



Antioch Community Trust

Complaints Policy & Procedures

1st October 2024

Approved by the Antioch Community Trust Trustees on 29th August 2024

This policy is due for review 30th September 2025

1. Purpose of this policy

Any complaint or concern that are of potential criminal nature must be reported to the police as soon as the matter is brought to anyone's attention.

The purpose of this complaints policy is to provide a flexible framework and process for dealing proportionately with complaints, low-level concerns, or expressions of concerns or other expressions of dissatisfaction against adults, relating to the activities of Antioch Community, or the behaviour or decisions made by anyone acting on behalf of the Antioch Community. It can be used to raise concerns about matters of process, organisational culture or practice or about specific concerns about an individual or group. Such issues are collectively called in this policy and procedure Complaints.

The Antioch Community is committed to creating a safe environment for all and to listening and responding proportionately to concerns that are raised with us. We see both formal complaints and informal expressions of dissatisfaction as opportunities to learn and improve our practice. This policy supports and is supported by a culture of openness, transparency, accountability and seeking to listen and respond well to concerns that we are aware of. ACT will therefore seek to understand, reflect upon, and learn from all expressions of dissatisfaction; not just those formally identified as complaints.

This policy does not cover safeguarding concerns or allegations against staff or volunteers, which are handled according to the safeguarding policy and procedures.

This policy does apply to, but is not limited to, concerns about any of the following:

- criminal activity,
- alleged miscarriages of justice,
- serious Health and Safety risks,
- financial maladministration,
- possible fraud and corruption,
- abuse of authority,
- other unethical conduct,
- concealment of information relating to any of the above.

As the Antioch Community, we seek to base our life and practice on the biblical values and beliefs that we hold. We are united by a covenant to love and serve the Lord, each other and all those he sends us. This policy is not intended to address interpersonal conflict between members of the community, which should be addressed in accordance with biblical principles.

The aim of this policy is to ensure that complaints or other expressions of dissatisfaction are addressed openly, transparently, impartially and in a timely manner.

2. Scope

This policy applies to any member of the Antioch Community, whether Trustees, Officeholders, Staff, Volunteers or Members. Complaints can be raised by any member of the public or by others with whom we have contact. Any individual or group that has a concern about the Antioch Community can invoke this policy at any time.

3. Our Commitment

- We will provide a fair complaints procedure that is clear, transparent, and that makes it as easy as possible for anyone wishing to make a complaint to do so.
- We will publicise the existence of our complaints policy and procedure so that people know who to contact and how, to make a complaint.
- We will ensure that we appoint and publicise the contact details of the person designated to receive complaints, hereafter referred to as the Complaints Administrator.
- We will ensure that members of the community know who the Complaints Administrator and Deputy is and how to pass any complaints received to them.
- We will ensure all complaints are investigated fairly and in a timely manner, following the policies and processes laid out here
 - Any investigation of the concerns must adhere to any real or perceived or risked conflicts of interests of any individual involved.
 - Any person(s) appointed to investigate the complaint must have sufficient authority within the Antioch Community and have no conflicts of interest, whether, real, perceived or risked.
- We will ensure that complaints are, wherever possible, resolved and will strive to see that relationships are repaired.
- The Complaints Administrator or Deputy will appoint an investigator, with appropriate competence and authority to investigate fairly and without bias and without any conflicts of interests.
- Following conclusion of the complaint, we will reflect on the experiences to help us learn lessons and improve our practice.
- If any issue raised under this policy relates to, or has an impact upon safeguarding practice or procedure, the Designated Safeguarding Leads (DSLs) will be informed by the Complaints Administrator and take over responsibility for the complaint.
- If at any point of the process of considering or responding to a complaint it becomes apparent that statutory thresholds have, or may have been reached, the investigator will make the referral to the relevant statutory authorities, depending on the issue, seeking advice without delay from police or other authorities, such as dialling 101.

4. Source of Complaints

Complaints may be received from a number of sources, (e.g. phone, in person, email etc) but must be followed up by Complaints Form from the person raising the complaint or concern if this policy is to be used.

Any expression of dissatisfaction provides an opportunity for learning and potentially the opportunity for reconciliation. As such, we will seek to respond well to any expression of dissatisfaction, even if the individual does not wish to make a formal complaint.

Where a Complaints Form is received, the Complaints Administrator or Deputy will establish whether the complainant wishes to commence at Stage 1 (informal resolution) or Stage 2 (formal consideration and possible investigation).

Anonymous complaints received by and/or passed to the Complaints Administrator or Deputy will be logged and checked for patterns of risk, and a decision made by the Complaints Administrator whether or not to action.

Matters raised as low-level concerns will be logged and checked for patterns of risk, and a decision made by the Complaints Administrator whether or not to action.

5. Responsibility

Trustees will appoint a person responsible for receiving complaints, the Complaints Administrator and a Deputy.

- The oversight of this policy and its implementation sits with the board of Trustees.
- Trustees will normally delegate any or all of the tasks associated with this procedure to the Complaints Administrator, unless the complaint is directed towards the Complaints Administrator, in which case the Chair of Trustees shall appoint a Trustee to investigate.

6. Receiving Complaints

Formal complaints are made using the Complaints Form available on the Antioch Community website, however, where a complaint is received, which is not on the Complaints Form, the Complaints Administrator may request the complainant to fill out a Complaints Form if likely to require investigation. If the Complaints Administrator requires more details, they shall ask the complainant to add these details to the Complaint Form and re-submit to the Complaints Administrator.

The Complaints Administrator may assist the complainant in drafting the Complaints Form where there are language barriers or other special needs to doing so.

7. Formal Acknowledgement

A formal acknowledgment of receipt of their complaint will be issued to the complainant within 7 working days by the Complaints Administrator

A complaints log that summarises complaints made, and progress status will be maintained on an ongoing basis. When a complaint is received, a confidential complaint file will also be established to ensure all records are stored securely and confidentiality is maintained.

8. Plan Response

Having established the details of the complaint, the Complaints Administrator will assess the information gathered and plan the response.

If a threshold for reporting to Statutory Services has been reached, as determined by the Complaints Administrator, the referral will be made immediately. The Complaints Administrator will cooperate fully with any investigation by statutory services and will ensure that any action required is taken promptly and that accurate records are maintained. The Antioch Community will not conduct any internal investigations until the outcome of the statutory investigation is known. It may, however, be deemed necessary or advisable that the individual of whom the complaint has been made that is referred to the statutory authorities, is suspended from membership or steps back from any role in the Antioch Community during the investigation.

If statutory thresholds have not been met, the Complaints Administrator will consider what action needs to be taken internally. This will include consideration of whether an internal investigation is required.

9. Communicate Response

The complainant will be informed of the decisions taken and the plan to address the complaint. If the decision is that no formal investigation is required. The reasons for this will be explained and the process for appealing that decision will be explained.

The complainant will be provided with a point of contact who will keep them informed of the progress and can be contacted with any questions during the process.

10. Procedures - Resolving Complaints

Stage One: Informal resolution

The Antioch Community is committed to resolving conflict according to biblical principles. Where appropriate, resolution and reconciliation should be sought relationally, however, scripture is clear that at times, matters need to be escalated and dealt with more formally. The pursuit of truth and justice are of paramount importance to the Antioch Community. This procedure provides for both informal and formal processes, along with a robust right of appeal.

If either the complainant or the community's representative(s) believe that the matter needs to be addressed at Stage 2, either can escalate the matter at any point. Stage One is not mandatory, and complaints can commence at Stage 2 where appropriate or requested by either party.

In the context of this procedure, Stage One (informal resolution) is a formal stage of the process and the informality is in the approach to resolution, not the process itself. Informal resolution is, in some situations, the most constructive approach, since it involves the complainant and Complaints Administrator in cooperating to address the issue in hand, and a resolution is mutually agreed with the person subject to the complaint.

Pastoral or other appropriate support should be offered to the complainant and the subject of the complaint, and any other party(s) involved in the complaint.

A written summary of the discussions, along with any decisions and actions agreed will be kept, a copy of which will be provided to the complainant and a further copy for the Antioch Community's own records. The complainant and the other party(s) involved in the complaint will be asked to confirm that this record is accurate, and the Antioch Community's record will be kept securely for future reference.

Please note, this procedure does not prevent issues being discussed over multiple meetings if this is acceptable to both the complainant and the Complaints Administrator.

Stage Two: Formal Consideration

Stage two can be initiated by either the complainant or the Complaints Administrator at any point. If the complainant wishes, they can request that Stage One is waived, and the process commences at Stage Two. No justification is required for such a request.

If Stage One has been concluded but resolution has not been reached, the complaint will be escalated to Stage Two. Notification of the wish to escalate should usually be given to the Complaints Administrator within 14 days of the completion of Stage One.

If commencing at Stage Two, the complainant must clearly indicate the nature of their concerns.

- The complainant must set out the details of the complaint including supporting evidence
- This must be done in writing by the complainant to the Complaints Administrator.

- Written acknowledgement of receipt of a request for Stage 2 will be provided within 14 days.
- The acknowledgement will name a specific contact person, who is the investigator, and will indicate the timeframe for a decision on how the matter will be progressed.
- Pastoral or other appropriate support will be offered to the complainants by someone acceptable to the complainant or signposts made to external support agencies and appropriate funding offered by the Antioch Community.

Explanatory note: The Antioch Community takes all complaints seriously and will respond proportionately, however, where it can be reasonably demonstrated that a complaint is frivolous, vexatious or otherwise demonstrable false or unreasonable, the Complaints Administrator will not expend extensive resources investigating unnecessarily and will inform the Complainant accordingly.

The Complaint Administrator shall appoint an “Investigating Officer” with sufficient competence and without conflicts of interest. The Complaints Administrator shall consult with the complainant during this appointment, seeking agreement, but withholds the right to appoint the person if reasonable agreement cannot be reached. Dependent upon the circumstances, the Complaints Administrator may appoint outside agency investigating officer, if the complexity of the case requires, with the approval of the Trustees.

The Investigating Officer(s) will notify the complainant in writing of the investigation process and anticipated timeframes

- If the complaint relates to a specific person, they should be informed, and they will be given opportunity to respond.
- The specific person of whom the complaint is made, may wish to step down from Antioch Community activities if the complaint is a matter of serious nature or the Chair of Trustees may request that they do so if so informed by Complaints Administrator.
- Written notes of interviews will be taken and held securely in a confidential complaint file.
- If there are delays to the timeframe or changes to the process, a progress report should be sent as soon as possible to the complainant with an indication of when a full response will be provided.
- Once the investigation is complete, the Investigating Officer(s) will report the findings to the Complaints Administrator who will scrutinise, and quality assure the process and findings.
- The complainant and the specific person of whom the complaint is made, will be notified of the outcome of the investigation and any recommendations made either in writing or verbally followed by confirmation in writing.
- The complainant will also be provided with details of the appeals processes, which they may instigate if they are not satisfied with the outcome of the complaint investigation.
- Appeals should be lodged within 28 days of the notification of the outcome. If this does not provide the complainant with sufficient time, they may register their intention to appeal within 28 days of the notification of the outcome, with a proposed timeline for lodging the appeal with a maximum proposed time of 6 months.

Stage Three : Appeal

- If the complainant is dissatisfied with the process or outcome of the investigation, they can appeal the decision in writing to the Complaints Administrator within 28 days of receipt of the outcome.
- The complainants appeal must clearly state the reasons for the appeal in writing and provide evidence to support their appeal.

- The appeal is NOT a reinvestigation of the original complaint. The complainant must explain why they believe that the process or findings are unreliable to justify the appeal. Unqualified disagreement, or disagreement without a clear justification is not a ground for appeal and will not be considered.
- The Investigating Officer(s) will be invited by the Complaints Administrator to respond issues raised in the appeal.
- The Complaints Administrator will pass the appeal documentation, along with the response from the Investigating Officer(s) to the Trustees.
- The Trustees will then take responsibility for the process, consider the appeal and decide what action should be taken.
- Once any necessary inquiries/investigations are complete a final decision will be made on the robustness and reliability of the Stage 2 process and findings by the Trustees
- The complainant and the specific person of whom the complaint is made, is then notified of the outcome.
- The complainant will be notified of any options to raise the concerns further, these would include a complaint or referral to the charity commission or statutory services if they believe those thresholds have been met.
- The decision taken at this stage is final.

11. Confidentiality and Information sharing

All complaints must be handled sensitively and confidentially. Information concerning the complaint should only be shared on a need-to-know basis, telling only those who need to know and following any relevant data protection procedures or requirements and must follow the Antioch Community Privacy Policy

Information gained on any complaint that is shared with Statutory Services will be fully disclosed to the relevant Statutory Service.

Appendices

Appendix 1: Definitions of Types of Concern

A complaint is an expression of dissatisfaction, grievance, or expression of concern, whether justified or not, about any aspect of the Antioch Community's common life. This can be about a person or persons, an activity, a group, or about a service that is provided by the community or about any other aspect of community life. Complaints relate to fairness, procedure or practice.

A low-level concern is an observation of behaviour that does not require a complaint to be made and as a single observation may not create risk but may be part of a pattern of behaviour that does require a complaint to be made.

A safeguarding concern is a concern that a child, young person, or adult with care and support needs may require protection from harm, or support to avoid poor outcomes and promote wellbeing. Such concerns must be raised using the Safeguarding Policy and/or reporting directly to the Statutory Services.

Statutory Services are the relevant government agencies with regard to the nature of the complaint with the default being the police. Police may advise use of another statutory agency, such as the Charity Commission

Whistleblowing is the escalation of a concern by someone from within organisation to an external body because:

- They have raised the matter internally, but the organisation has not addressed the concerns or
- They are unable to raise the matter internally due to fears about the consequences of doing so

Appendix 2: Antioch Community Complaints Form

Your Details
Name: Email: Phone: Date of Complaint:
Details of your concern / complaint (Please provide a full account of your concerns)
<p>Note: if your concern is relating to children, youth or adult safeguarding, please be clear in your description, so that the Safeguarding Policy is used.</p> <p>Do you believe this is a low-level concern i.e. a one-off observation that may or may not be part of a pattern or risk.</p>
Supporting evidence (please provide any documentary evidence or details of anyone e.g. witnesses, that you wish us to speak to)
Action taken to address this concern (Have you raised this concern with anyone else? If so, please provide details.)

Desired outcome / action (What would you like us to do? Please note: this is to help us understand your concern and is not a guarantee that we will agree)

Any other relevant information that you wish to supply

Please send to the Antioch Community
Complaints Administrator for action.

Complaints Administrator
Name:
Email address:

