



Safeguarding Complaints Policy and Procedure

1 Introduction

- 1.1 The Church of England is committed to ensuring that everyone is treated fairly and with respect and dignity when it responds to safeguarding concerns and allegations. We in the Diocese of York want our churches to be places of safety for all, as well as places of welcome and worship.
- 1.2 While we always want to provide high-quality safeguarding services, we know that sometimes things go wrong. By putting this complaints policy in place, we hope to improve accountability, build trust, and make sure that complaints are addressed clearly and consistently.
- 1.3 This policy explains how the Diocese of York approaches complaints about how a safeguarding issue has been handled or investigated within the Diocese.
- 1.4 The policy and procedure set out here is specifically intended for handling complaints about safeguarding practices. For any other complaints relating to the actions of Diocesan employees, please see the DBF Complaints Policy which can be found on our website.
- 1.5 In February 2025, the General Synod approved the development of a new standardised safeguarding complaints process for all Church of England responsible bodies. This development aims to bring greater consistency, transparency, and fairness to the way complaints about safeguarding are handled across dioceses and cathedrals in the Church of England.
- 1.6 The intention of the Diocese of York is to adopt the agreed national process when it is available. This updated interim policy is based on the anticipated future policy which is currently the subject of national stakeholder consultation.

2 Aims of the policy

- 2.1 We take complaints about our work and quality of our service seriously, and as an opportunity to learn and improve.
- 2.2 The procedure below aims to:
 - Offer a fair, straightforward, and user-friendly process.
 - Be open and transparent about how complaints are handled.

- Make sure that complaints are investigated thoroughly and appropriately.
- Be timely and proportionate.
- Promote learning from complaints to improve safeguarding practices within the Church.

3 Glossary

Church Officer - Any person appointed or elected by, or on behalf of, the Church to a post or role, whether they are ordained or lay, paid or unpaid. This will therefore include clergy, staff, volunteers and elected members in parishes and cathedrals; diocesan staff and senior clergy but would not include third-party contractors.

Complaints Manager – The designated individual responsible for overseeing the complaints process, ensuring that complaints are assessed and resolved in accordance with this policy.

Diocesan Secretary – A senior officer within a diocese. In the complaints process, they receive the Investigating Officer's recommendations and sends the outcome of the complaint to the person bringing the complaint. If a complaint relates to the Diocesan Secretary, the DBF Chair and Archbishop will determine who will act in their stead.

DSAP Chair – The independent chair of the Diocesan Safeguarding Advisory Panel. For some complaints, the DSAP Chair may be appointed as the Investigating Officer.

Investigating Officer – The person appointed to carry out a formal investigation into a complaint at Stage Two and to provide a report with their recommendations.

Independent Reviewer – The person appointed to review the outcomes at Stage Two where that investigation was not carried out by an independent investigating officer.

Investigation – The full and detailed analysis and examination of the subject matter that has resulted in a complaint.

4 Definition of a complaint about safeguarding

- 4.1 For the purposes of this policy, a complaint is an expression of dissatisfaction or concern about the way a safeguarding matter¹ has been handled in York Diocese. It applies when the person being complained about is a Church Officer who had handled a safeguarding matter.
- 4.2 This policy covers dissatisfaction about how a safeguarding process was followed and/or the service received in a safeguarding context.

Type of complaint	Explanation	Examples
Service level complaints	Complaint about the service received in a	Complaints about the behaviour and conduct of a member of staff, volunteer or clergy person in

¹ The definition of a safeguarding matter can be found at paragraph 1.2 [Section 1: Context | The Church of England](#)

	safeguarding context	relation to their response to a safeguarding matter. Complaints about timescales not being adhered to. Complaints about poor communication.
Process complaints	A complaint about how a safeguarding process was followed	Someone participating in a safeguarding case management group (SCMG) failed to declare a conflict of interest. Someone was not offered all the support they were entitled to under the Responding Well to Victims and Survivors of Abuse policy. A policy or process was not followed, and this has had a substantial impact upon the outcome.

4.3 This safeguarding complaints process does not cover:

- Reports about a safeguarding concern or allegations, which should be reported to the Diocesan Safeguarding Adviser/Officer [See our website for [how to report a safeguarding concern](#)].
- Disagreement with the *outcome* of a safeguarding investigation following the report of a concern or allegation.
- Requests for information.
- Questions about a policy or procedure.
- New allegations about a safeguarding matter.
- Grievances initiated by a member of staff.
- Complaints under the Church of England's Clergy Discipline Measure 2003. Information about clergy discipline is available here: <https://www.churchofengland.org/about/leadership-and-governance/legal-resources/clergy-discipline>
- Complaints about safeguarding matters handled by the National Safeguarding Team, a religious community, or other diocese.
- Whistleblowing complaints. Whistleblowing is the disclosure by employees of information which relates to suspected wrongdoing e.g. an officer or employee of the Diocesan Board of Finance breaking or proposing to break the law, acting dishonestly in any way, or otherwise seeking to cover up any wrongdoing. Such matters should be dealt with under our Whistleblowing Policy, which is available to all employees via the Staff Hub.
- Complaints about data protection. Matters relating to the handling of personal data, including concerns about data breaches, subject access requests, or the misuse of personal information, fall outside the scope of this safeguarding complaints process. These should be directed to our Head

of Governance and will be handled in accordance with our Data Privacy Policy: <https://dioceseofyork.org.uk/privacy/>

- 4.4 This policy should not be used where individuals disagree with a national policy, set by the National Safeguarding Team. Any concerns about national policy should instead be raised to policy.safeguarding@churchofengland.org.

5 Timescales

- 5.1 We will seek to avoid undue delays in responding to complaints. There may, however, be circumstances when key staff are unavoidably absent, or the issues raised are particularly complex, which mean that we are unable to complete tasks within the timescales set out in the following sections. Where this occurs, the Complaints Manager will seek to provide regular progress updates.
- 5.2 Where initial communication is by telephone or email and the Complaints Manager is absent, we will seek to provide an indication of their date of return to work and/or an alternative contact. For reasons of confidentiality, where contact is made by post the letter will not routinely be opened. If you have not had an initial response to a letter of complaint within ten working days (to allow for delivery times), please contact office@yorkdiocese.org or call 01904 699500.

6 Guiding principles

- 6.1 The person making the complaint must be directly affected by the issue or must be bringing the complaint for someone directly affected by it (e.g. a Safe Spaces or IDAS advocate).
- 6.2 All information will be treated with sensitivity and will only be shared with individuals if that is necessary to investigate the complaint. All personal data will be processed in line with our data privacy policy at <https://dioceseofyork.org.uk/privacy/>.
- 6.3 The person bringing the complaint should provide their name and contact information, as this helps us to thoroughly investigate the issue, verify relevant details, and keep the person informed about the progress of the investigation.
- 6.4 Some individuals may feel more comfortable making complaints anonymously. We will consider all anonymous complaints carefully. But it is important to note that our ability to investigate and respond will be limited if we cannot contact the person bringing the complaint for further information.
- 6.5 If there is a reasonable belief that a complaint has not been made in good faith, and is primarily intended to cause disruption and annoyance, it will not be taken forward. Examples include complaints:
- That have been previously considered and decided.

- That are being pursued in a way that is having a seriously negative effect on our staff or work (e.g. via social media, harassment of individuals, persistent abusive emails).
 - Where the remedy being sought is clearly unreasonable, unachievable, or lacks meaningful connection to the issue raised.
- 6.6 Complaints that have already been fully investigated through this complaints policy or that are broadly or substantially the same as a previous complaint will not be taken forward.
- 6.7 Where an alternative process is initiated in parallel by or on behalf of the person bringing the complaint (e.g. the issue of a pre-action letter), the DBF complaint process will be paused until the alternative process is concluded.
- 6.8 If the person bringing the complaint does not agree with the reason for their complaint not being progressed, they are entitled to request a review of that decision. This will be undertaken by an external third party selected from a list maintained by the National Safeguarding Team. The outcome of that review is final.

7 Right to be supported

- 7.1 The person bringing the complaint has the right to be supported throughout the complaints process. The person bringing the complaint may have someone with them to provide emotional or practical support. This could be a friend, family member, colleague, or someone from a support service.
- 7.2 The supporter is there to help the person bringing the complaint feel comfortable. They may take notes, help the person prepare, or provide reassurance. They should not speak on the person's behalf, answer questions for them, or act as their representative or advocate, without the permission of the person bringing the complaint.
- 7.3 Supporters must not act in a professional legal capacity. If the supporter is legally trained, they may only attend in a personal capacity (e.g. as a friend or relative).
- 7.4 Support services are available through Safe Spaces or IDAS [contact details can be found on the diocesan website <https://dioceseofyork.org.uk/our-diocese/safeguarding/victim-and-survivor/>]

8 Stage One – Informal resolution

- 8.1 In many cases, the most effective way to resolve a complaint is by addressing it informally.

This means that the person bringing the complaint should talk to the person or group responsible for the issue locally, who should identify a member of staff to

handle the complaint. This will usually be the line manager of the person being complained about.

For diocesan employees, please contact the Complaints Manager (see 8.1) who will identify a member of staff to handle the complaint.

In some cases, the person bringing the complaint may not feel comfortable with an informal resolution process and may decide to go directly to Stage Two.

- 8.2 The member of staff handling an informal complaint will
- Introduce themselves to the person bringing the complaint, tell the person about support that is available (see section 6, above), and request any further information they need.
 - Tell any staff who are the subject of the complaint about the complaint and ask them for any information they need.
- 8.3 A face-to-face or virtual meeting will normally be arranged with the person bringing the complaint unless they indicate that they do not wish to meet. A note of the meeting will be shared with the person bringing the complaint. The member of staff will write to the person bringing the complaint within four weeks of that meeting (or of confirmation that the person bringing the complaint does not want to meet in person) setting out the outcome of their complaint, with their reasons. If the member of staff needs additional time, for example because key individuals are not available, they will tell the person bringing the complaint, and set a new timeframe.
- 8.4 The member of staff handling the complaint will consider five key questions:
- What the complaint is about.
 - The outcome that the person bringing the complaint is looking for.
 - Whether this outcome is possible and, if not, why not.
 - Whether input from someone or something else might help to resolve the complaint.
 - What learning, if any, can be captured from the complaint process.
- 8.5 It may be appropriate to offer mediation as part of the informal resolution stage, if the person bringing the complaint agrees that it could help resolve the complaint.
- 8.6 It is hoped that an acceptable resolution will be found, and that the complaint can be resolved informally. However, we recognise that this may not always be suitable or appropriate. The person making the complaint will not be criticised or penalised for not attempting informal resolution.

9 Stage Two – Formal resolution

Preliminary matters

- 9.1 If the person bringing the complaint is not satisfied with the resolution proposed at Stage One, or they do not wish to attempt informal resolution, they should notify the Complaints Manager. Information about how to contact the Complaints Manager is available here: <https://dioceseofyork.org.uk/our-diocese/safeguarding/complaints/>
- 9.2 The complaint at Stage Two should normally be made within two weeks of receiving the Stage One outcome. We understand that there may be circumstances where this is not possible, and we will consider reasonable requests for extensions however only in exceptional circumstances will this be considered after six weeks of receiving the Stage One outcome.
- 9.3 A complaint can be made in writing (including email) or by telephone. Where a complaint is made by telephone, the person bringing the complaint will be invited to confirm the details in writing to ensure accuracy and completeness.
- 9.4 The person bringing the complaint should be prepared to share detailed information about:
 - Their full name.
 - Contact information.
 - The full name(s) of the person(s) being complained about.
 - What the complaint is about.
 - The desired outcome.
- 9.5 Upon receiving the Stage Two complaint, the Complaints Manager will:
 - Seek to acknowledge receipt of the complaint within one working week.
 - Decide whether the complaint can be handled under this procedure. If the complaint involves more than one issue, the Complaints Manager will decide whether all the issues can be investigated under this procedure and, if not, will tell the person bringing the complaint how to pursue any issues which cannot be investigated under this procedure.
 - Review all documentation and actions taken.
 - Clarify and discuss with the person bringing the complaint the situation from their perspective and why informal resolution could not be reached or was not attempted. Meetings should also be recorded and/or transcribed and shared with the person bringing the complaint for accuracy.
- 9.6 In some circumstances, the Complaints Manager may need to involve or consult others before deciding how a complaint should be handled. Where necessary,

they may need to take advice from the Diocesan Registrar, Diocesan Safeguarding Officer, HR, or other professionals.

- 9.7 The Complaints Manager may decide to convene a group to decide how to handle the complaint, for example if the complaint is complex, serious, or urgent. Minutes and notes of any group discussion must be kept.
- 9.8 If safeguarding advice is required in order to decide how to handle a complaint, the Complaints Manager should approach their Regional Safeguarding Lead (RSLs) for advice. If their RSL is unavailable or has a conflict of interest in relation to the complaint, they should approach the National Safeguarding Team. Records of group discussions or advice received will be kept and retained.
- 9.9 During this time, which will be kept as short as operationally possible, the Complaints Manager will maintain regular contact with the person bringing the complaint. This will normally be weekly unless otherwise agreed between the parties.

Investigation of Stage Two complaints

- 9.10 If a complaint is identified as one which is to be dealt with under the Stage Two procedure, the Complaints Manager will decide who is best placed to investigate the complaint based on the individual circumstances of the complaint.
 - The Complaints Manager will appoint an individual (the Investigating Officer) to investigate the complaint.
 - The appointment of the Investigating Officer will be determined on a case-by-case basis based on the principles below. The Complaints Manager will review and document all actions taken with rationale for allocation to an Investigating Officer so that accurate records and documentation are kept.
 - For complaints about service quality, such as communication delays, administrative errors, or minor dissatisfaction, the Complaints Manager will usually allocate to an Investigating Officer internal to the Diocese. Complaints will not be investigated by anyone who has had prior involvement in, or direct knowledge of, the matters being complained about. This includes individuals who were involved in the original safeguarding case or decision.
 - For complaints about the safeguarding process, or how the diocese has handled a safeguarding concern, the Complaints Manager will request the Diocesan Safeguarding Advisory Panel (DSAP) Chair or their appointee to serve as the Investigating Officer, provided the Chair (or their appointee) is both willing and available and has not previously advised on the case. The DSAP Chair (or their appointee) will be someone independent of the diocese appointed for their experience of safeguarding.

- Where this is not possible or appropriate, for example if there are no available members of the DSAP with no involvement in the original case or the earlier stages of the complaint process, the Complaints Manager will contact the National Safeguarding Team which maintains a list of qualified and trained safeguarding investigators. In this case, the Complaints Manager will contract an appropriate person to act as an Investigating Officer. In these circumstances, their investigation would be considered to be the final stage review (see section 9).
- The Complaints Manager will advise the person bringing the complaint when a full response can be expected. The goal is to provide a definitive reply within seven working weeks of appointing the Investigating Officer. If this is not possible, a follow-up letter will be sent at regular intervals by the Complaints Manager with an updated timetable.

9.11 The Investigating Officer will:

- Make all necessary and appropriate enquiries to establish the substance of the complaint and any attempts made already to resolve the matter.
- Initiate further discussions or meetings with the person bringing the complaint where appropriate, to fully understand their issue, seek clarity and be clear on what would constitute a resolution for them.
- Speak with any other parties such as may be required in order to ensure that they have the necessary information available to respond to a complaint.
- Discuss with the Diocesan Safeguarding Officer and/or Regional Safeguarding Lead (where appropriate) and consider what an appropriate response and resolution might be.

9.12 The Investigating Officer will complete a report of findings and decisions, which will be sent to the Diocesan Secretary within five weeks.

9.13 The report must include one or more of the following recommendations:

- An acknowledgement that the complaint was upheld in full, with a brief description of any action being taken.
- An acknowledgement that the complaint was upheld in part, with a brief description of any action being taken and reasons why the remainder of the complaint was not upheld.
- That the person bringing the complaint be provided with an explanation of events.
- That the person bringing the complaint receive an apology and/or recognition that the situation could have been handled differently or better.
- That the person bringing the complaint be provided with an explanation of the steps that have been taken to try to ensure that it will not happen again.

- That the person bringing the complaint be provided with an explanation, with reasons, that the complaint has not been upheld.
 - That one or more other specified actions be taken.
- 9.14 The Diocesan Secretary will write to the person bringing the complaint within one week of receipt of the report, where possible. They will set out the action taken to investigate the complaint, the Investigating Officer's findings and decisions, and any action to be taken as a result of the complaint.
- 9.15 The response will not include any details of any disciplinary or other actions, procedures, or outcomes against a member of the clergy or an employee. Where appropriate, the response should state that following investigation, further procedures are being followed.
- 9.16 The Diocesan Secretary will ensure that full records of the investigation are kept together with the records of the initial complaint. These will include:
- A copy of the original complaint letter, email, or written note.
 - Details of how the complaint was investigated, identifying any documents read.
 - Written records/transcripts of any interviews undertaken.
 - Results and conclusions of investigations.
 - Any action taken and who is responsible for taking this action.
 - The outcome letter will explain whether any steps remain open, if the person making the complaint is dissatisfied with the outcome.
- 9.17 Where the complaint has been subject to review by an independent consultant from the approved list held by the National Safeguarding Team, the response and summary of their review will be the final stage of the process.
- 9.18 Where the complaint has not been subject at Stage Two to an investigation undertaken by an independent consultant, the person making the complaint will be offered the option of a final stage review.

10 Final Stage

- 10.1 As noted at 2.2, the Church of England is committed to establishing an independent National Scrutiny Body (NSB) which will take on responsibility for the End Stage of complaints relating to Safeguarding. This body is expected to have statutory powers in relation to the outcomes that it determines.
- 10.2 Pending the creation of that body, and where the Stage Two process has not involved an external independent investigator, the diocese will offer the option of an independent review of the outcomes of the Stage Two process.

- 10.3 Where the person bringing the complaint is not satisfied with a resolution proposed at Stage Two, they should notify the Complaints Manager.
- 10.4 The Final Stage complaint should normally be made within two weeks of receiving the Stage Two outcome. We understand that there may be circumstances where this is not possible, and we will consider reasonable requests for extensions however only in exceptional circumstances will this be considered after six weeks of receiving the Stage Two outcome.
- 10.5 The Final Stage Complaint must clearly set out the areas of dissatisfaction that the person bringing the complaint considers to be outstanding. Whilst it may refer to aspects of the conduct of earlier stages of this process, it may not introduce new complaints relating to matters that gave rise to the original complaint that were not previously notified at Stage Two.

11 Final Stage Process

- 11.1 Upon receiving the Final Stage complaint, the Complaints Manager will:
- Acknowledge receipt of the complaint within one week.
 - Forward the complaint, together with the outcomes from earlier stages to a qualified and trained safeguarding investigation from the list maintained by the National Safeguarding Team within one week of receipt of the original request to escalate. Where this timetable cannot be met due to the availability of independent investigators and/or a need to clarify the outstanding issues, the Complaints Manager will provide a revised timetable.
- 11.2 Upon receiving the Final Stage complaint, the independent reviewer will:
- Acknowledge receipt of the complaint to both the person making the complaint and the Diocese.
 - Consider the complaint and produce a scoping document together with an estimate of the work involved and information required to the Diocese within two weeks.
 - The terms of reference for the investigation will be shared with the person making the complaint.
 - In the light of the work involved and their availability, the independent reviewer will set out the timetable for their investigation and report.
 - The independent reviewer will complete a report of findings and decisions, which will be sent to the Diocesan Secretary and the Archbishop in line with the timetable provided.
 - The delivery of that report will be confirmed to the person making the complaint by the independent reviewer.

- 11.3 The report will contain an Executive Summary containing an outline of the scope of the investigation undertaken, the key conclusions reached and outcomes and actions recommended for the diocese. This Summary will be written in a manner that enables it to be shared with the person making the complaint and will not include any personal data or references to individual practice.
- 11.4 The Diocesan Secretary and/or Archbishop will, where possible, write to the person bringing the complaint within ten working days of receipt of the final report. If there is a delay, for example due to non-availability of key staff, the Complaints Manager will communicate with the person making the complaint.
- 11.5 The final response provided by the Diocese will include a copy of the Executive Summary provided by the independent reviewer, provide any further explanation and/or apologies that arise from the complaint, and confirm any action to be taken arising from the complaint.
- 11.6 As at Stage Two, the response will not include any details of any disciplinary or other actions, procedures, or outcomes against a member of the clergy or an employee. Where appropriate, the response will indicate that following investigation, further procedures are being followed.

12 Monitoring complaints and lessons learned

- 12.1 The Complaints Manager will ensure that a log is kept of all complaints received, the timescale of the resolution process, and the lessons learned.
- 12.2 The number, type and outcome of any complaints will be provided once a year to the Diocesan Safeguarding Advisory Panel and the Trustees of the DBF so that the action taken can be validated and any trends or further actions deemed necessary can be considered.

13 Responsibility for this policy

- 13.1 Overall responsibility for this policy and its implementation lies with the DBF. The policy will be reviewed periodically and updated as necessary on the advice of the Diocesan Safeguarding Advisory Panel.

Approved by the York Diocesan Board of Finance
February 2026