



COMPLAINT MANAGEMENT POLICY

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This policy is adapted from the [Fellowship of Independent Evangelical Churches Complaints Policy](#) and the [Complaint Handling Model Policy for Charities and Not-for-Profits](#), the FIEC Church Policy Template for Complaints Management and policies from other FIEC Australia member churches.

Other References:

- Effective Complaint Handling Guidelines. NSW Ombudsman. 2017
https://www.ombo.nsw.gov.au/_data/assets/pdf_file/0020/131096/Effective-complaint-handling-guidelines-Third-edition.pdf
- Complaint Handling Guide: Upholding the rights of children and young people. National Office for Child Safety. Australian Government. www.childsafety.gov.au/system/files/2022-09/nocs-complaint-handling-guide.pdf
- [Orange Evangelical Church \(OEC\) Inc. Constitution](#)
- Where to make a complaint (NSW Ombudsman's website)
<https://www.ombo.nsw.gov.au/Making-a-complaint/complaints-we-handle>
- What the ACNC can investigate <https://www.acnc.gov.au/raise-concern/concerns-about-charities/what-acnc-can-investigate>
- NSW Fair Trading Fact Sheet – Making a Complaint About an Incorporated Association.
https://www.fairtrading.nsw.gov.au/_data/assets/pdf_file/0006/540897/Association-complaints-fact-sheet.pdf



INTRODUCTION

Orange Evangelical Church (OEC) seeks to follow Jesus' instruction to: 'Love the Lord your God with all your heart and with all your soul and with all your mind' and to 'Love your neighbour as yourself' (Matthew 22:37-39). Love for God and for people shapes everything we do as a Church. It informs how we respond to those who raise complaints or grievances about the behaviour of people or processes in our church. These complaints are valuable opportunities to love people, and so to bring glory and honour to God.

God's desire is that his church pursues Gospel unity. The bible encourages Christians to live at peace with one another and provides a framework for addressing interpersonal conflict and concerns in church. Addressing raised concerns and complaints is an important part of loving those in our local community, increasing confidence and trust, and protecting OEC.

This policy provides a system that supports people to provide feedback and make a complaint. It enables OEC to know when issues arise, address these situations promptly and effectively, to care for people wisely and improve our systems and processes.

PURPOSE OF THIS DOCUMENT

This document is intended to ensure:

1. OEC members and the wider community know how to provide feedback or make a complaint to OEC.
2. OEC Staff and Overseers involved in receiving and managing a complaint understand their role and responsibilities and our complaint management system.
3. Complaints are managed fairly, effectively and in a timely manner by OEC.

DEFINITIONS

In this document, the below established definitions are used¹:

A **complaint** is an expression of dissatisfaction made to or about us, our services, staff or team leader, where a response or resolution is expected or legally required².

A **dispute** is an unresolved complaint escalated either within or outside of our organisation.

Feedback includes opinions, comments and expressions of interest or concern to or about us, about our services or complaint handling system where a response is not expected or legally required.

A **grievance** is a formal written statement by an individual staff member about another staff member or a work-related problem.

¹ Complaints-handling: model policy and procedure, developed by Not-for-profit Law at Justice Connect and promoted by the ACNC <https://www.acnc.gov.au/tools/templates/complaints-handling-model-policy-and-procedure>

² AS/NZ 10002:2014



An **allegation** is a concern that a legal obligation has not been met in the context of church. This may include for example an allegation of misconduct, child abuse or other form of criminal conduct.

SCOPE

OEC is committed to the fair and timely handling of all complaints, whether raised internally by members or externally by those outside the church. This document outlines the principles and processes by which complaints will be managed by OEC.

Grievances are managed according to section 14 of OEC's [Constitution](#). FIEC Australia provides additional support for all human resource situations upon request.

Allegations are managed as required by NSW Fair Trading, the OEC Constitution and OEC's suite of Safe Ministry Policies (see Responding to Breaches of Code of Conduct, Safe Ministry Incident Management Process) and referred to the relevant external body as required.

ROLES AND RESPONSIBILITIES

OEC Overseers

The OEC Overseers are responsible for all OEC Policy and any procedures relating to its implementation. They will model a culture of biblical unity by valuing feedback and complaints and being committed to effective resolutions and the improvement of OEC systems and processes. The OEC Overseers will be responsible for all complaints pertaining to church governance, including financial management, work health and safety and matters of significant complaint and will make any required reports to governing bodies. The OEC Overseers will delegate the majority of complaint handling to the OEC staff and leaders.

OEC Senior Minister

In addition to his responsibilities as an OEC Overseer, the OEC Senior Minister will oversee and/or manage all complaints relating to staff, except in instances where a complaint is made against the OEC Senior Minister. In such a case, the complaint will be handled by the OEC Overseers with the exclusion of the OEC Senior Minister. The OEC Senior Minister will manage all ministry-related complaints and will support OEC Staff and Team Leaders in their complaint handling roles and responsibilities.

OEC Administrator

The OEC Administrator is the first point of contact for any feedback or complaint formally submitted to OEC. The OEC Administrator will communicate with all complaints from non-members of OEC and support OEC staff and OEC Overseers in managing complaints. Trends in complaints and issues are to be tracked by the OEC Administrator.



OEC Staff

OEC Staff are to be familiar with this policy and encourage a culture of biblical unity. They must ensure people making complaints are listened to and treated with respect. OEC staff should be aware of the process of making a complaint or giving feedback and provide information on how to make a complaint when asked. OEC Staff will manage complaints relating to ministry or events they lead, with assistance from the OEC Senior Minister. Staff are given appropriate authority, support and supervision to empower them to resolve complaints and receive feedback in an effective and godly way.

OEC Team Leaders

OEC Team Leaders are to ensure people making complaints are listened to and treated with respect. Team Leaders are to be aware of this policy and direct anyone wishing to make a complaint or provide feedback to use the OEC Complaint and Feedback Form (Attachment 1) or talk to the relevant OEC Staff member. Team leaders are given appropriate authority, support and supervision to empower them to resolve complaints and receive feedback in an effective and godly way.

GUIDING PRINCIPLES

OEC is committed to seeking and receiving feedback and complaints and dealing with any concerns raised within a reasonable timeframe. Our complaint management system is based on the following guiding principles:

Fairness

Anyone making a complaint or providing feedback will be treated with respect and care. Every complaint will be dealt with in an equitable, objective and unbiased manner.

Where a complaint is about a particular person, we will generally notify the person that a complaint has been made against them. Reasonable detail must be provided such that the subject of the complaint is able to adequately respond. If a complaint is made against someone, an opportunity for response must be afforded to the subject of the complaint.

Conflicts of interest are to be managed responsibly and transparently. Those involved in the handling of complaints will seek to be objective; not actually biased or commonly perceived to be biased. When delegating their functions, the OEC Overseers will ensure the delegate does not have a conflict of interest.

Responsiveness

We seek as a church to raise concerns or feedback with the person involved, where practicable, before escalating it. Reconciliation is often possible through listening, understanding, consideration, repentance and forgiveness.

There will be times when this is not possible or appropriate due to the nature of the complaint or a power imbalance. In such situations the complainant will utilise the complaint management process. The complainants will be informed of the process, the likely time frames for action, the progress of



their complaint including any reason for delay and the possible outcomes of their complaint by the relevant delegate, as per Diagram 1.0.

OEC is committed to dealing with raised concerns in as prompt a manner as possible. Fairness requires that investigations be completed without undue delay and will be prioritised in accordance with urgency and/or seriousness. We seek to resolve complaints within 35 days where possible, and 60 days for complex situations.

Flexibility and accessibility

OEC seeks to foster a culture that values feedback and complaints as avenues for improvement. To this end, we aim to make our complaint management process transparent and accessible to all. Information outlining how to make a complaint is available online, and OEC's Complaint and Feedback Form (Attachment 1) is available in hard copy in the foyer of the OEC Ministry Centre.

Confidentiality

The fact that a complaint has been made, and the details contained within that complaint will be kept confidential so far as is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by OEC as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations. Discussion will be limited to those who need to be involved to facilitate complaint resolution and to care pastorally for anyone involved.

Free of Repercussions

OEC aims to ensure that no one is adversely affected as a consequence of raising a concern, making a complaint or providing feedback.

LEVELS OF COMPLAINT MANAGEMENT

OEC members and members of our community can make complaints or provide feedback at various levels. The person making the complaint and OEC Staff can escalate the complaint to a higher level.

Level 1: Raise the complaint or feedback with the OEC member. This is the level at which complaints and feedback are most frequently engaged with in a ministry context.

Level 2: Raise the complaint or feedback with an OEC Staff Member or team leader.

Level 3: Raise the complaint or feedback with the OEC Administrator using the complaints form. This initiates the formal complaint process as detailed below, overseen by the Senior Minister.

Level 4: Raise the complaint or feedback with the OEC Overseers using the complaints form. This initiates the formal complaint process as detailed below, overseen by the OEC Overseers. The OEC Overseers, at their discretion, may ask that the complaint be managed at another level.

Level 5: Raise a relevant complaint with an external body. This may include the Australian Charities and Not-for-Profits Commission (ACNC) or NSW Fair Trading.



These do not need to be followed sequentially; however, they do reflect the pattern of conflict resolution that we seek to wisely model.

COMPLAINT MANAGEMENT PROCEDURE

OEC's complaint management system includes all policies, procedures, practices, staff and resources used in the management of complaints. The key stages of our approach are outlined below.

1. Complaints raised and satisfactorily resolved by the people involved

Level 1 and 2 complaints are resolved before they enter the official complaints management system. This occurs as OEC members raise their concerns, are listened to, understood and a satisfactory resolution is found.

2. Receive the complaint

Level 3-5 complaints and feedback are to be recorded in as much detail as is provided by the person making the complaint on the OEC Complaints and Feedback form (Attachment 1). If a complaint is made orally, the person to whom the complaint is made is to encourage the complainant to record their complaint in writing on the form. The Form is available on our website (www.oechurch.org.au) and in hard copy format in the foyer of the OEC Ministry Centre. The form is provided to the OEC Administrator or the Overseers.

OEC recognises that some complainants do not wish to be linked to their complaint (anonymous complaints). Moreover, some complainants do not want the person they are making a complaint about to know who they are (unlinked complaints). These two forms of complaints will be handled according to this procedure, where sufficient information is included in the complaint to enable further investigation. However, anonymity may limit several complaint processes including the capacity of OEC to investigate fully and the ability to achieve understanding and reconciliation.

3. Acknowledge the complaint

Once a written complaint is received, the OEC Administrator or OEC Secretary will acknowledge receipt of the complaint as soon as possible, usually within five working days. Consideration will be given to the complainant's communication preference as recorded on the OEC Complaint and Feedback Form. The complainant will be advised that the complaint will be referred on for assessment by those responsible for the particular area, and the expected time frame that it might take for them to receive a response.

4. Address and investigate

In assessing the complaint received, the Senior Minister, the OEC Overseers or their delegate will determine if the issue raised is within our scope, and if so, how it should be managed. In deciding this, they will take into consideration the nature of the complaint, the effect on the person making the complaint, the risk the issue raised poses to others and whether involvement of external organisations is required.



For Level 4 complaints, the OEC Overseers have many options and will address the complaint according to the best option, but not limited to the options illustrated below (see Diagram 1.0). Where a complaint is made against an Overseer or where there is a clear conflict of interest, that Overseer will remove himself from the complaint resolution process, including the investigation of the complaint and the decision made by the Overseers.

A Complaints Team (consisting of one Overseer, one male OEC Partner and one female OEC Partner) may be appointed by the OEC Overseers to address and investigate the complaint and to advise the Overseers on the next step.

The OEC Board of Reference may also advise on the handling of a complaint or be invited to be involved in the investigation. OEC's Board of Reference is appointed by the association to support OEC in pursuing the association's statement of purpose.

5. Determine the outcome

A decision will be made as to what action is necessary and the reasons for this decision will be documented. Where necessary, external and/or professional advice may be sought.

6. Communicate the outcome

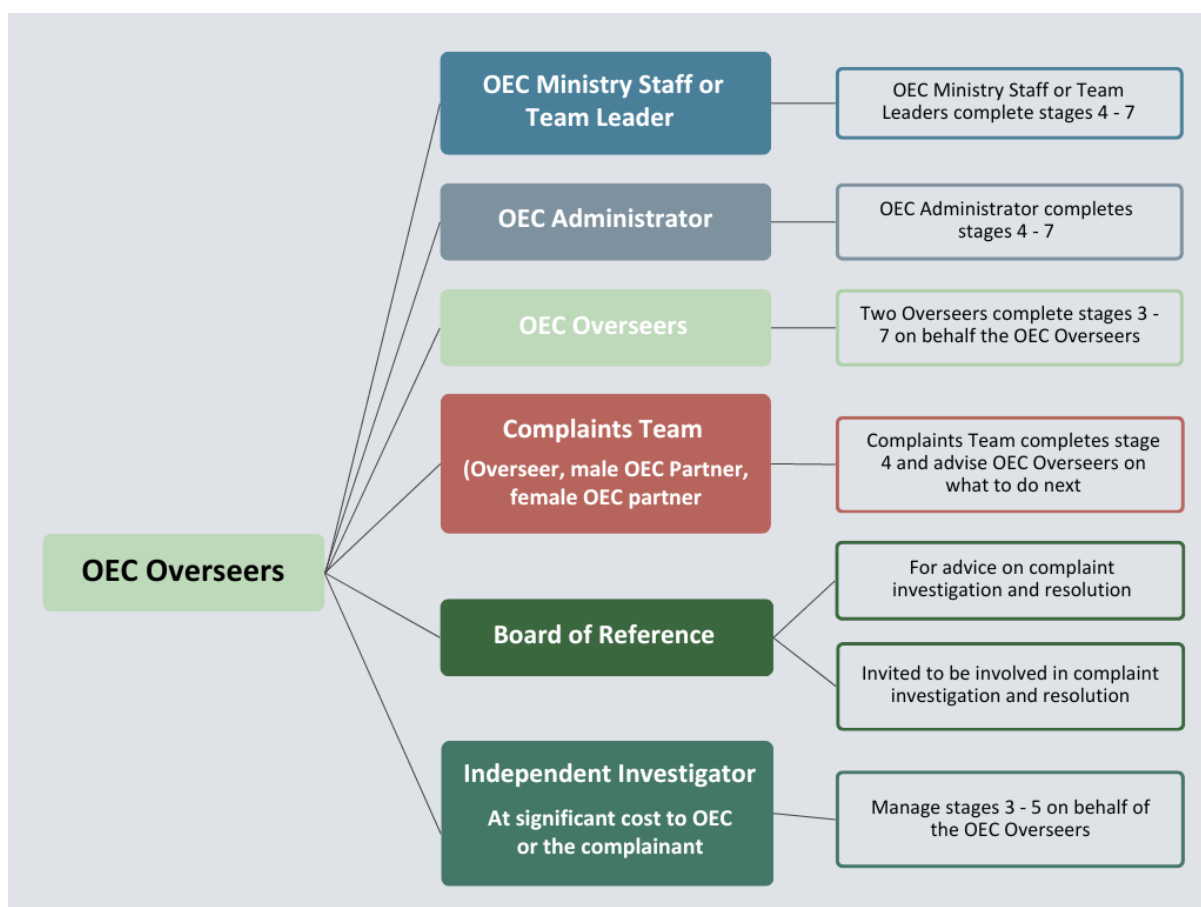
The determined decision will be communicated to the person who made the complaint, along with reasons for the decisions and any relevant options for review if they are dissatisfied with the process. The person about whom a complaint was made will also be made aware of the outcome.

7. Close the complaint and record details

Once a complaint has been closed, appropriate records will be kept, including details of the complaint made, how it was managed and the outcome, along with recommendations, the due date and the person responsible for these. The complaints register and expected timeframes will be regularly reviewed by the OEC Overseers.



Diagram 1.0



MANAGING DISPUTES

A dispute is an unresolved complaint. This occurs when a person has made a complaint, which has been addressed in line with the documented complaint management system, but the complainant is not satisfied with the outcome.

OEC's process for managing internal disputes is based on [our constitution](#) which dictates that internal disputes are to be dealt with by the OEC Overseers (CI14a). If a complainant is unhappy with the outcome of their complaint, they can appeal to the OEC Overseers. The Overseers will consider this appeal and decide whether the complaint warrants further investigation on the basis of their appeal.

The complainant can request a review of the completed complaint management process by a member of the OEC Board of Reference or the FIEC National Director.

POLICY REVIEW

Orange Evangelical Church is committed to improving its complaints policy and management procedures. The policy and procedures within this document will be reviewed by the OEC Administrator and submitted to the OEC Overseers for approval in August 2024 and then biannually.



POLICY DISTRIBUTION

All OEC staff are advised of policy updates when they are approved by the OEC Overseers. This policy is readily available on our website. Printed copies of OEC's Complaint and Feedback Form (Attachment 1) are available in the foyer of the OEC Ministry Centre and on our website.



ATTACHMENT 1 – COMPLAINT AND FEEDBACK FORM

Complaint and Feedback Form

Name of person making complaint and/or providing feedback: <input type="checkbox"/> I wish to remain anonymous			
Name:			
Phone:			
Email:			
<input type="checkbox"/> Visitor/attendee	<input type="checkbox"/> Church Member	<input type="checkbox"/> Member of the public	<input type="checkbox"/> Staff
<input type="checkbox"/> Other (please specify): _____			
I would like to:		<input type="checkbox"/> Provide feedback	<input type="checkbox"/> Make a complaint
I am submitting this on behalf of:		<input type="checkbox"/> Myself	<input type="checkbox"/> Someone else: _____

Complaint Details
Date of complaint:
Date of issue/concern (if applicable):

Outline of complaint (please provide as much detail as possible to allow us to address your concern):



Next steps

- ☐ I don't need any action taken or follow up, I just wanted to inform you
- ☐ I expect action would be taken but I do not need to know the outcome
- ☐ I would like someone to contact me about my feedback/complaint via ☐ phone ☐ email
- ☐ Other (please specify):

Additional Questions (not required)

- ☐ Would you like to indicate a preference for who investigates this complaint?
- ☐ Ideally, what outcome would you like to see from providing this feedback/complaint?

Please send completed form to complaints@o church.org.au Complaints will be responded to within five working days.



ATTACHMENT 2 - FLOWCHART

Making a Complaint

