

Workplace Chaplains

Policies

CIGB Management Council are committed to supporting and enabling Workplace Chaplaincy in as fair and clear a way as possible, following good practice.

This pack details the policies that CIGB Management Council, Staff and Chaplains are asked to observe.

CIGB Management Council welcomes feedback on these policies. They will be reviewed at regular intervals, and as necessary.

For further information contact CIGB Development Director.

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Code of Behaviour for Workplace Chaplains

Chaplains are expected to take note of these guidelines. CIGB provides training, support and team opportunities to work on these skills. Serious breach of this Code could lead to removal of authorization by CIGB, in accordance with behavior management procedures.

CIGB Chaplaincy helps workplaces to be learning places of faithful values and of good character. CIGB seeks for Fulfilled Individuals and an Economy that helps us be good humans together. CIGB sees faith as an integral part of what it is to be human.

Chaplains with CIGB recognise that: each individual has dignity and worth and their spirituality is an essential part of their health and wholeness; the spiritual care of persons is part of the total care offered within organisation; inclusivity and diversity are foundational values in pastoral services offered to persons, and are valued through the structures of CIGB's recruitment, support and care for voluntary chaplains.

Chaplains are present in an organisation for people of all faiths and all Christian denominations, and of no faith; but they may assist Christians and other faith members in the workplace wanting to live out their faith.

Chaplaincy is a 'self-emptying' generosity: Chaplains need to ensure that they set up structures for themselves for emotional and spiritual replenishment.

In their Behaviour, Chaplains should aim to be:

1. Non-judgemental and non-discriminatory; respectful of individual background / tradition; not causing unnecessary offence.
2. Listeners, allowing speakers to think for themselves and find their own answers, as far as possible: but Chaplains are not acting as counsellors and can give cautious, appropriate suggestions.
3. Able to explain their own faith motivations and beliefs in appropriate language, when asked about them.
4. Responsible and professional, as far as possible; eg in keeping appointments, being reliable.
5. Recognising that all of us at times fall short of the ideals of our own values / traditions; thus respecting mistakes
6. Loyal to the host organisation: not betraying sensitive information outside of the business
7. Communicating clearly and responding professionally to requests and using advertising opportunities to promote the services of chaplaincy
8. Adaptable and Imaginative, as far as possible, in fitting chaplaincy to the structures and changes in the organisation. Sensitive to work patterns and not disrupting work unnecessarily, nor breaking local rules.
9. Confidential - even from own faith group, or organisational management, if needed – and with respect to the confidentiality rules of the organisation. But abuse or serious potential harm must be passed on
10. Be Prayerful and Reflective: discerning where God is at work in a situation; seeking to learn about the host organisation; and taking the necessary time to know themselves and feed their own spiritual life.
11. Connecting with a local church or faith community and using their experience to feed the life and faith of that community.
12. Maintaining and celebrating integrity; being particularly supportive of those who are vulnerable and powerless; being willing, if necessary, to witness to the causes of significant problems.
13. Understanding of other faith traditions, festivals etc and respecting their convictions. Chaplains should not attempt to recruit or convince someone to another way of faith or thinking,
14. Observing Health and Safety , Equalities, Safeguarding and Data Protection regulations, and taking care of their own and others' safety; eg taking lone-working precautions (as necessary) and avoiding situations where they may have allegations made against them
15. Taking part in chaplaincy team meetings and de-briefing with colleagues, as appropriate, and being supportive of colleagues; reporting serious incidents to Team Leader and / or CIGB.
16. Managing conflicting relationships, when belonging to more than one organisation. Chaplains should not misuse power, or their position: eg for personal gain, nor for exploiting emotional or financial relationships.

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HEALTH & SAFETY POLICY

1. CIGB is committed to Wellbeing of workers and volunteers: our Health and Safety Policy is to encourage us to take care of each other, and be prepared against major risks.
2. Precautions and actions regarding Health and Safety are most appropriately planned and discussed at local level and in local teams – as chaplaincy practice varies considerably from place to place.
3. CIGB's Management Council takes responsibility for encouraging local chaplains/teams to do this planning, and asking them to report back to CIGB that they have done so. CIGB also makes the following general recommendations.
4. Most of the Chaplaincy work within CIGB takes place in premises that belong to other people; Health and Safety is generally the responsibility of the venue in which chaplaincy is operating. Chaplains are invited into the workplace and must comply with all local regulations and advice for the Health & Safety of themselves and others. In particular
 - a. Any dangers seen should be reported to the local managers.
 - b. All location specific courses must be completed before going on site.
 - c. All location specific Personal Protective Equipment (PPE) must be used.
5. Chaplains will perform their own risk assessments on a regular basis, and after significant changes, and submit their findings to their local team leader for local review. A copy of risk assessment findings will also be lodged with CIGB. Local teams should notify CIGB of any significant concerns that they have about risks.
6. In general particular care is needed around warehouses, car-parks, traffic lanes, railway lines, unfenced water or deep water (fenced or otherwise).
7. Significant accidents or 'near-misses' should be reported both to the management of the local workplace and to CIGB.
8. CIGB Management Council reserves the right to cancel a chaplaincy arrangement when it deems the risks to Health and Safety of Chaplains, Workers or general public to be too great.
9. Events organised by CIGB itself will be appropriately risk-assessed and necessary Health and Safety briefings given.



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RISK MITIGATION

It is good practice for our own safety, and for the safety of those with whom we exercise chaplaincy, that we consider and mitigate any major risks. Insurance cover also requires this.

We are asking that each individual chaplain to complete an assessment of the risks you may encounter whilst engaged in your chaplaincy work. This means thinking about what possible risks there are, how dangerous they are, how likely and if/what sort of action to be taken to reduce that risk.

Of course the list could be endless and assessment is somewhat a matter of opinion. Our understanding is that what best practice requires reasonable thinking/planning to go into forethought and preparation. The plan is to trigger the thought, discussion and planning: not give a complete statement of all the nuances or implications of every eventuality.

Chaplaincies in different workplaces will encounter different risks – although some are common to all – so each chaplain is asked to do their own assessment. As a guidance it is suggested that chaplains consider their top 5-10 most likely/dangerous risks

This list can then be reviewed once a year by each chaplaincy team (whatever that means in each chaplaincy) to discuss appropriate mitigating actions and to check that everything that should be in place still is, in the light of any changes within the chaplaincy. A copy of the risk assessments also needs to be held by CIGB Management Council.

If the chaplaincy team / leader or CIGB Management Council deem the risks to be too great, they may decide to end the individual chaplaincy.

Overleaf is a typical framework that can be used to record significant risks. As examples below, we have suggested some possible risks to consider.

When completed, please return the form to Val Dalton at the usual email address for reviewing and recording.

	Possible risk	Possible impact	Likelihood	Actions to take to reduce risk
	Accident whilst working alone	No help available	possible	Always carry charged phone?. Notify someone beforehand?
	Trip or fall while on stairs	Moderate injury	possible	Follow health and safety guidelines issued by company.
	Loss of notebook containing names / comments of staff	Loss of confidential info	possible	Use codes to hide individuals' identity?

	Possible risk	Possible impact	Likelihood	Actions to take to reduce risk
2				
3				
4				
5				
6				
7				
8				
9				
10				

SAFEGUARDING POLICY FOR CHILDREN AND VULNERABLE ADULTS

1 INTRODUCTION

Every vulnerable person deserves to be safe and secure in their life and activities. CIGB believes that every human being has a value and dignity which comes directly from the creation of male and female in God's own image and likeness. Christians see this potential fulfilled by God's re-creation of us in Christ.

Among other things this implies a duty to value all people as bearing the image of God and therefore to protect them from harm. God's Church is intended to be a place where men, women and children, including those who are hurt and damaged, may find healing and wholeness. It is the Christian calling to be agents of healing and justice in such a way that enables all who have suffered from abuse to lead lives with dignity, in a community of peace. ,

CIGB seldom works with children or vulnerable people in a one to one, unsupervised situation but should the occasion arise, CIGB has put in place safeguards to protect children, young people or vulnerable adults. CIGB has also put in place safeguards to avoid putting their workers in positions where abuse might be alleged, and to ensure that all workers know exactly what to do should abuse be suspected. CIGB believes it is important to not only protect the vulnerable from abuse but to actively promote the welfare of children, young people and vulnerable adults - not just to protect, but to safeguard. CIGB will work in partnership with the policies and procedures of places where chaplaincy takes place, and other organisations.

2 CIGB VALUES FOR SAFEGUARDING CHILDREN & YOUNG PEOPLE

A Child is a person under the age of 18 years as defined by the Children Act 1989 when addressing issues of abuse. 'Children' therefore means 'children and young people' throughout this document. Although 16-18 year olds are legally able to give their consent to sexual activity, they may nevertheless be harmed by those who are responsible for them and whom they trust:

Working Together to Safeguard Children 2010 (1.19) states: "The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital, in prison or in a Young Offenders' Institution, does not change his or her status or entitlement to services or protection under the Children Act 1989."

Our values in working with Children:

- The needs of the child are paramount and should underpin all child protection work.
- All children and young people have the right to grow up in a caring and safe environment.
- Children and young people have the right to be protected from abuse of all types, and to expect that adults in positions of responsibility will do everything possible to foster those rights.

3 CIGB VALUES FOR SAFEGUARDING VULNERABLE ADULTS

The definition of a Vulnerable Adult is defined in the 'No Secrets' government report as a person "who may be in need of community care services by reason of mental or other disability, age or illness; and who is unable to protect him or herself against significant harm or exploitation." For the purposes of this policy, this category can be extended to those in temporary emotional distress, which in many cases can render an individual susceptible to manipulation or exploitation. Our values within our work with such people are:

- Privacy: The right of individuals to be left alone or undisturbed and free from intrusion or public attention into their affairs.
- Dignity: Recognition of the intrinsic value of people regardless of circumstances by respecting their uniqueness and their personal needs and by treating them with respect.

- Independence: Opportunities to act and think without reference to another person, including a willingness to incur a degree of calculated risk.
- Choice: Opportunity to select independently from a range of options.
- Rights: The maintenance of all entitlements associated with citizenship.
- Fulfilment: The realisation of personal aspirations and abilities in all aspects of daily life.
- Valuing Diversity: Respect for different cultures, ethnic backgrounds, disabilities, religions, ages, genders, and sexual preferences.

CIGB SAFEGUARDING PROCEDURES & GUIDANCE

4 CHAPLAINCY CONTACT WITH CHILDREN, YOUNG PEOPLE & VULNERABLE ADULTS

CIGB chaplains may work with children, young people and vulnerable adults directly and indirectly through their chaplaincy work to various outlets and establishments. Chaplains may build strong relationships on the basis of providing a listening ear.

Meetings with Children and Vulnerable Adults should always be in public, in the workplace or a public meeting area. Chaplains should avoid physical contact, or language, that might be misconstrued. Chaplains should not meet alone, in private with a child or vulnerable adult. Chaplains should not offer any form of private meeting or relationship, or on-line/Social Media contact outwith the context of Chaplaincy to children, young people or vulnerable adults. Where unsolicited contact is made with a chaplain by an individual outside of Chaplaincy this context, this should be immediately discussed with a colleague.

Chaplains receiving Abuse disclosure, or with concerns about Safeguarding, should report those within the structure of the organisation hosting chaplaincy, in the first instance, and inform the CIGB Development Director that this referral has been made. In the case that the host organisation does not have a clear procedure, or there is not a clear line of reporting, CIGB Development Director should be informed in the first instance.

If a Chaplain believes a child or vulnerable adult is in immediate danger, they should either contact Social Services or the police, as well as informing the host organisation and CIGB Development Director.

All allegations of abuse against a chaplain, however minor, are to be reported to the chaplain's Team Leader and Development Director.

5 PREVENTING OPPORTUNITIES FOR ABUSE

CIGB aims to:

- Ensure we practice safe recruitment in checking the suitability of staff and volunteers to work in the environment they are appointed to.
 - Most Chaplaincy posts are not eligible for DBS checking under the current guidelines;
 - CIGB will ensure that any Chaplaincy involving regular and significant contact with Children / Vulnerable Adults will be DBS checked – this will usually be by the host organization.
 - CIGB will seek at least 3 references for every post.
- Work with the Chaplaincy organization to make sure that Chaplains adhere to local Safeguarding practices.
- Make our Safeguarding Policy available, and Ensure all Chaplains adhere to this policy. Behaviour Management sanctions may be taken against Chaplains who fail to abide by this policy.
- Provide CIGB staff, team leaders, and those working in chaplaincies with regular, significant contact with children or vulnerable adults with training on safeguarding children and vulnerable adults.
- Review our Safeguarding practice and policy at regular intervals.

6 DEFINITIONS OF TYPES OF ABUSE

6.1 *Physical Abuse of Children, Young People or Vulnerable Adults*

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult.

Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

Physical Abuse - Indicators	
<i>Physical Indicators</i>	<i>Behavioural Indicators</i>
<ul style="list-style-type: none"> § Unexplained injuries – bruises / abrasions / lacerations § The account of the accident may be vague or may vary from one telling to another § Unexplained burns § Regular occurrence of unexplained injuries <p>Most accidental injuries occur on parts of the body where the skin passes over a bony protrusion.</p>	<ul style="list-style-type: none"> § Withdrawn or aggressive behavioural extremes § Uncomfortable with physical contact § Seems afraid to go home § Complains of soreness or moves uncomfortably § Wears clothing inappropriate for the weather, in order to cover body § The interaction between the child, vulnerable adult and its carer

6.2 *Neglect*

Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's or vulnerable adults health or development.

Neglect may involve a parent/carer failing to:

- Provide adequate food, clothing and shelter;
- Protect a child or vulnerable adult from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's or vulnerable adult's basic emotional needs.

Neglect - Indicators	
<i>Physical Indicators</i>	<i>Behavioural Indicators</i>
<ul style="list-style-type: none"> § Unattended medical need § Underweight or obesity § Recurrent infection § Unkempt dirty appearance § Smelly § Inadequate / unwashed clothes § Consistent lack of supervision § Consistent hunger § Inappropriately dressed 	<ul style="list-style-type: none"> § Poor social relationships § Indiscriminate friendliness § Poor concentration § Low self-esteem § Regularly displays fatigue or lethargic § Frequently falls asleep § Frequent unexplained absences

6.3 *Emotional Abuse*

Emotional abuse is the persistent emotional maltreatment of a child or vulnerable adult such as to cause severe and persistent effects on the child's or vulnerable adult's emotional development, and may involve:

- Conveying to children or a vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;

- Imposing age or developmentally inappropriate expectations on children. These may include interactions that are beyond the child's or vulnerable adult's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or vulnerable adult participating in normal social interaction;
- Seeing or hearing the ill-treatment of another;
- Serious bullying, causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults.

Emotional Abuse - Indicators	
<i>Physical Indicators</i>	<i>Behavioural Indicators</i>
§ Poor attachment relationship	§ Low self-esteem
§ Unresponsive/neglectful behaviour towards the child's or vulnerable adults emotional needs	§ Unhappiness, anxiety
§ Persistent negative comments about the child or vulnerable adult	§ Withdrawn, insecure
§ Inappropriate or inconsistent expectations	§ Attention seeking
§ Self harm	§ Passive or aggressive behavioural extremes

6.4 Sexual Abuse

Sexual abuse involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, including prostitution, whether or not the child or vulnerable adult is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts.

Sexual abuse includes non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of pornographic materials, watching sexual activities or encouraging children or vulnerable adults to behave in sexually inappropriate ways.

Sexual Abuse - Indicators	
<i>Physical Indicators</i>	<i>Behavioural Indicators</i>
• Sign of blood / discharge on the child's or vulnerable adult's underclothing	§ Sexually proactive behaviour or knowledge that is incompatible with a child's age & understanding
§ Awkwardness in walking / sitting	§ Drawings & or written work that is sexually explicit
§ Pain or itching – genital area	§ Self harm / Suicide attempts
§ Bruising, scratching, bites on the inner thighs / external genitalia	§ Running away
§ Self harm	§ Substance abuse
§ Eating disorders	§ Significant devaluing of self
§ Enuresis / encopresis	§ Loss of concentration
§ Sudden weight loss or gain	

6.5 Discriminatory forms of Abuse

This form of abuse involves direct or indirect discrimination of children or vulnerable adults because of their race, gender, sexuality, disability, religion, mental health status or age.

Discriminatory Abuse – Examples:
<ul style="list-style-type: none"> • Lack of culturally or gender sensitivity in care practices • Access to services denied due to lack of disability awareness and access needs of members • No attempt to address language barriers • No provision of culturally sensitive food • No awareness of importance of faith festivals etc.

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CONFIDENTIALITY POLICY

1. Confidentiality and Chaplaincy

Confidentiality is a key part of Workplace Chaplaincy: on the whole people need to be able to trust that what they tell a Workplace Chaplain is not going to be reported back to their colleagues or managers. Chaplaincy can provide a 'safe space' in which issues are discussed, in faith that honesty and truthfulness can lead towards reconciliation.

2. What does Confidentiality mean in Workplace Chaplaincy setting?

Confidentiality in workplace chaplaincy means, as a rule, not relaying information that others could readily connect back to an individual / group of individuals. Sometimes general themes or specific issues arising from chaplaincy encounters may be communicated to others, if the chaplain views that some communication would benefit the organisation and/or the individual. In such a case the chaplain ought to try to make sure that such information is anonymised re persons, locations, dates etc

3. Disclosures / Limits of Confidentiality

There may be rare occasions in which workplace chaplains have to break confidentiality. It may not be possible to define absolutely what issues and circumstances might require a breach of confidentiality: it would be good practice, if time and safety allows, to discuss the issue with a chaplain colleague or supervisor prior to a significant disclosure.

Occasions when disclosure may be or is necessary:

- a. Safeguarding – protecting the welfare of others or the individual themselves.
- b. Crime – protecting the welfare of the organisation, the public, other members of staff, from a significant criminal threat / detriment.
- c. Health and Safety – protecting the welfare of the organisation, the public, or other members of staff
When we share information on confidential issues, we need to have the full informed consent of the person involved.

If we judge that information needs to be disclosed, it may be good practice to inform the person involved that such disclosure is necessary.

4. Keeping records

As a general practice, records of chaplaincy encounters should be anonymised (see Data Protection policy). However in cases where breach of confidentiality is deemed necessary, it may be good practice to record timely information relating to the issue, in order to accurately support the disclosure.

5. Permission to Share Information freely

It may be that individuals grant the chaplain permission to share freely information that has been discussed during a conversation. Similarly chaplains may refer to information that is in the public domain.

DATA PROTECTION POLICY

Introduction

1. CIGB needs to process information about employees, volunteer chaplains, trustees, useful contacts, organisations and other individuals.
2. CIGB Development Director and Administration Officer will deal with day-to-day data protection issues. The Development Director is the Data Controller.
3. The CIGB Management Council has overall responsibility for ensuring that CIGB works in line with the Data Protection Act and that chaplains are aware of their responsibilities.
4. The CIGB Management Council, CIGB staff and volunteer chaplains, and any others who process personal information on behalf of CIGB must comply with the principles of the Act.

Data Protection Act 1998

5. When we process information, we need to keep to the terms of the Data Protection Act 1998. In particular, we need to make sure that we process information in line with eight principles of data protection described in the Act. These state that information must be:
 - Fairly and lawfully processed
 - Processed for limited purposes
 - Adequate, relevant and not excessive
 - Accurate and up to date
 - Not kept for longer than is necessary
 - Processed in line with individuals' rights
 - Secure
 - Not transferred to other countries without adequate protection
6. The Data Protection Act sets limits on the way we collect, store and use information. The Act controls how:
 - We file information
 - We access information
 - We pass information on to other organisations and individuals;
 - How and when we destroy information we are storing.
7. The Act says that people have a right to access any information that we hold about them. This includes volunteers and people who use our services. The Act says that we have to respond to requests for access to information within 40 calendar days.
8. CIGB does not have to register with the Information Commissioner because:
 - it is a not-for-profit organisation;
 - we only process information necessary to establish or maintain membership, or to support people who have contact with us;
 - we only share the information with people and organisations necessary to carry out the organisation's activities;
 - we only keep the information while the individual is a member or supporter or as long as necessary for member/supporter administration.

CIGB's Data Activity

9. CIGB wants to protect the right of individuals to privacy and so staff and chaplains will take appropriate measures to make sure that the data we hold is stored securely.

10. Collecting Data

- a. CIGB chaplains and staff may record data of people who initiate communication with them, in order to respond to their requests and to supply them with further information about CIGB.
- b. CIGB may collect and store data in the public domain in order to supply people and organisations with information about CIGB.
- c. CIGB chaplains and staff may record sensitive data about people with whom they have had conversations, chaplaincy interactions or meetings. Such data will be stored securely or coded so that it is not immediately recognizable to another party. Any information recorded will be adequate, relevant and not excessive in relation to chaplaincy purposes.
- d. As far as possible, CIGB chaplains and staff will keep data up to date and accurate.
- e. CIGB chaplains and staff may record statistical information about the sort of contacts that they have, for reporting to businesses. Individuals will not be identifiable from these records.
- f. When people supply us with their information we will inform them of how we intend to use that information by pointing them towards our Personal Information Use statement on our website (www.cigb.org.uk/home/personal information).
- g. This Personal Information Use Statement says:

How we use the information you give us

Information you give CIGB (and our chaplains and staff) will be used by us (and our chaplains and staff) to tell you about CIGB services, and to give you information on issues relevant to Chaplaincy and Industrial Mission in Birmingham, Solihull and West Midlands. The information will not be made available to the general public and will be stored in accordance with best Data Protection principles.

CIGB will also draw on information in the public domain, and may store that information.

CIGB will communicate with you by telephone, letter, email, or in any other reasonable way.

You can ask for a copy of the information we hold about you and your organisation, and if the information isn't accurate, you can ask us to correct it.

If you do not want to receive letters, emails and telephone calls from us in the future, please tell us in writing.

We may occasionally pass your contact information to other similar organisations, after careful consideration. If you do not wish that to happen then please let us know.

Statistical information about our chaplaincies and contacts may be shared with other bodies, but no identifiable personal information will be disclosed in this way.

If you have any questions about how CIGB will use information please contact us.

11. Right of access

- a. CIGB staff, volunteers, contacts, and people who use our services have the right to access personal information CIGB holds about them, whether in electronic or paper form.

- b. People who want to access information held about them should contact the CIGB Administration Officer. We will need to check that they are the individual who they claim to be, before releasing our information.
- c. People can also ask in writing to be removed from our records, or to say how and when we can use the information we hold about them. For example, someone might choose not to receive emails from us, but might still want to receive our newsletter. We need to deal with requests like this within 21 days.

12. CIGB Data Storage and Security

- a. Personal information relating to the involvement of individuals and organisations with CIGB is stored centrally and by local chaplains.
- b. Centrally, the information is stored on the CIGB computer, database and filing cabinet. Data may also be stored in 'on-line / 'Cloud' storage systems. Filing cabinets will be kept locked when not in use. Computer/ Cloud storage is to be protected by adequate passwords and encryption as necessary. Access to this data is limited to CIGB staff, Chair of CIGB Management Council, and their agents. Some of this information is considered sensitive. Before disposal, sensitive personnel documents are shredded.
- c. Locally, sensitive information is stored by chaplains, workers and volunteers on their computers and local filing systems. Data may also be stored in 'on-line / 'Cloud' storage systems. These people undertake to keep this data secure (eg strong password protected), to restrict access to it, and to destroy it confidentially in due time.
- d. We shall not transfer data to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal information.

13. Sharing Data

- a. There are circumstances where the law requires or allows CIGB to disclose data (including sensitive data) without the data subject's consent. These are:
 - i. Carrying out a legal duty or as authorised by the Secretary of State
 - ii. Protecting vital interests of a Data Subject or other person
 - iii. The Data Subject has already made the information public
 - iv. Conducting any legal proceedings, obtaining legal advice or defending any legal rights
 - v. Monitoring for equal opportunities purposes – i.e. race, disability or religion
 - vi. Providing a confidential service where the Data Subject's consent cannot be obtained or where it is reasonable to proceed without consent: e.g. where we would wish to avoid forcing stressed or ill Data Subjects to provide consent signatures.
- b. In principle CIGB will only share personal data with other chaplaincy agencies.
- c. CIGB Chaplains may share statistical records, extracted from personal records, with businesses. No personal data will be shared in this way.

14. CIGB and Chaplains' / Staff Responsibilities

- a. It is a responsibility of Chaplains and Staff to ensure that:

- i. They process personal information in ways that follow good data protection practice in collecting, securely storing (including on-line storage), using and sharing data.
 - ii. Anyone they allow to access the data adheres to these guidelines.
 - iii. Any personal information they choose to give to CIGB colleagues is accurate and deserves to be communicated.
 - iv. They understand that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them.
- b. CIGB Development Director is responsible for ensuring that:
 - i. Everyone processing personal information is appropriately trained to do so and appropriately supervised.
 - ii. Anybody wanting to make enquiries about handling personal information knows what to do.
 - iii. CIGB deals promptly and courteously with any enquiries about handling personal information,
 - iv. CIGB describes clearly how it handles personal information,
- c. CIGB Management Council will assess this policy at regular intervals, against best practice and any changes or amendments made to the Data Protection Act 1998.

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KEEPING RECORDS POLICY

1. Most Workplace Chaplains feel that it is helpful to keep records of their activity and encounters – not least for memory of pastoral care issues. Notes about individuals need to be kept confidentially and carefully.
2. Record keeping can help with
 - a. Remembering peoples' names and significant stories
 - b. Remembering locations / different functions of the business
 - c. Aiding reflection on how contacts are being developed / managed / progressed
 - d. Gaining a self-measure of what you have been doing over the longer term, and how the chaplaincy may have changed.
 - e. Providing anonymised feedback to supporting churches, business leaders and funders
 - f. Recording material for telling the story of chaplaincy to newcomers / outside organisations
 - g. Aiding prayer and reflection on where God may be seen at work.
3. It is also increasingly the case that Chaplaincy supporters and funders ask to see evidence of the work that is being done by paid staff and volunteers. This evidence may both be (anonymised) stories and number counts of activity. "In a world of measuring outcomes, without recorded numbers, the danger is your work become invisible".
4. CIGB has a parallel Confidentiality and Data Protection policy. It is important that confidences with individuals are kept to maintain our credibility and to keep to Data Protection rules.
 - a. Within CIGB, we understand Confidentiality to mean not sharing information with a person's colleagues or other staff in the organisation / local areas (except in extremis or with permission); but it may be ok to discuss issues with other chaplains in the local CIGB team, in order to debrief / reflect on conversations; and to discuss within a supervision setting.
 - b. Confidentiality also means taking care with any notes that are recorded, especially if there were a big concern that confidentiality had been breached if the notes were found by another person. Chaplains are recommended to use a form of coding to anonymise names within records, and to store those records carefully (eg locked drawer, password protected computer).
 - c. Data Protection principles mean that any data kept should be relevant, accurate, not excessive, stored securely, not kept for longer than necessary and only passed on in very limited cases (and usually only with consent). See the Data Policy for more guidance on this.
5. An example of how a chaplain may keep their own pastoral records:
 - I do need something to jog my memory.
 - For each chaplaincy I carry about some notes briefly listing dates, times, locations and staff names, if known.
 - I use a code to record who the conversation has been with: eg first three letters of their name, backwards. Usually that is enough to remind me who it was.
 - I jot down topics, 'health', 'manager', 'horses' or 'twin nephews', to help chat to reserved people and note prayer requests.
 - I discreetly scan the notes on my journey to the chaplaincy and if I need to note something while visiting, I find a quiet place to do so.
 - Afterwards, I look back at my notes to remind me if anything/anyone particular needs following up.

6. Chaplains are also asked to keep a brief log of how many encounters they have during a chaplaincy episode, in a format such as below (quarterly recording booklets are available from CIGB).
- These numbers will be aggregated to give an overall view of chaplaincy over the longer term.
 - They are not a measure of chaplaincy success or efficacy: some chaplaincy locations allow for more conversations than others; some chaplaincies are, by necessity, more a case of 'presence' than direct encounter.
 - Nevertheless the total numbers will be used to paint part of the picture of chaplaincy to our funders and supporters.

	Passing Chat	2-5 mins	10-15 mins	Longer & more serious
General				
Working life				
Health / bereavement				
Relationships at work				
Family life				
Faith				
Other				

Church and Industry Group Birmingham and Solihull

LONE WORKER GUIDELINES

The purpose of these guidelines is to help those chaplains who are “lone workers” with the practical steps to be taken to keep safe, while noting that all people have a duty to take reasonable care of themselves.

1. When is a worker a lone worker?

A ‘Lone Worker’ is any person whose work involves either a regular or a large portion of their time in situations where there is no close, frequent or regular involvement with other contactable workers or supervision.

2. Be aware

- a. Everyone should remember that their own personal safety should be a priority; and be aware of their own health needs. People should not get involved in any situation that is escalating or where there are concerns that it might result in danger.
- b. Be aware of the environment: Know local hazards, alarm systems and procedures, exits and entrances, location of first aid help. Be cautious in isolated places.
- c. Be aware of yourself. Think about what you are wearing. In any anxious encounter think about your body language, tone of voice and choice of words. Be aware of things that may trigger your anger or upset you.
- d. Be aware of other people: take note of their non-verbal signals, allow people space.

3. Carry out a Risk Assessment and take precautions

- 1 identify the hazards
- 2 decide who can be harmed and how
- 3 evaluate the risks and decide on precautions
- 4 record your findings and implement them; monitor and update them as necessary.

1 The Hazards (things with the potential to cause harm)

Whilst the hazards are similar to everyday working situations they may be exacerbated by the fact that a person is alone and perhaps not in the immediate vicinity of aid and assistance, e.g:

- abusive clients or animal attacks
- defective vehicles
- fire or noise
- remoteness or isolation
- slips, trips or falls
- sudden illness rendering the person unable to summon help

2 Who can be harmed?

Lone-working volunteers and other employees/members of public

3 Evaluate the risks and decide on precautions

You may need to consider new precautions, safe practices or carry personal protective equipment, e.g:

- access to communications – eg make sure you carry a fully-charged mobile phone.
- first aid equipment & training
- safe general working practices – eg make sure you sign in / out
- carry some identification or Next of Kin contact information.
- using a “buddy system” (eg notifying a colleague when you arrive/leave) or personal alarm.
- maintenance checks on equipment and vehicle.

4 Record your findings & implement them; Monitor and update.

Keep records of the significant findings of your risk assessments. Ensure team leaders and managers are informed of the results and any new safe working practices. Risk assessments and the outcomes to be monitored as often as required to ensure they remain effective. They should be reviewed or updated when there are major changes to the organisation, work practice or working environment. Should an accident or incident occur which indicates a failure of the precautions that have been developed then they should be reviewed immediately.

4. High risk situations

Where a risk assessment identifies that lone working poses a high risk to a lone worker, lone working should be avoided or arrangements for providing assistance and support put in place.

5. Home visits or out of office visits

Chaplains should avoid visiting people in their own homes or in isolated situations. However if this is necessary it should be discussed with the relevant team leader/colleague.

If necessary details of your expected movements should be recorded with them, and after finishing a visit the chaplain should instigate a contact procedure, e.g. mobile phone call to their colleague. If there is no contact when expected the colleague should go directly to the last known address or alert the police.

6. Communications

Mobile phones of Lone Workers should always be kept fully charged. However, phones should not be relied on as the only protective measure. They provide a degree of comfort and support to those working alone in the community, but chaplains should also ensure they use other relevant precautions.

7. Incident

Where people are involved in an incident where they felt threatened or intimidated they should complete an accident/occurrence report and report it to their Team Leader and CIGB Development Director.

8. Supervisory meetings

Lone workers should have regular supervisory meetings with Team Leaders and/or colleagues to review hazard precautions and experience.

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EQUAL OPPORTUNITIES POLICY

CIGB is striving to be an equal opportunities organisation. Therefore we will aim to treat all workers and volunteers equally.

There will be no discrimination in respect of marital status, gender, sexuality, disability, age, colour, race, nationality, religion, ethnic or national origins.

However, there are exceptions allowed within the job application process in situations where being of a particular religion or belief is a genuine and determining occupational requirement. (Employment, Equality (Religion or Belief) Regulations 2003.)

The basis for appointment to a Chaplaincy post is a balance between CIGB's considered opinion of the applicant's suitability, the Individual's own sense of appropriateness and the Host organisation's opinion.

All chaplains have a legal and moral obligation not to discriminate against any individual or group of individuals. Anyone found to be discriminating will face disciplinary proceedings.

Chaplains should report incidents of discrimination to CIGB and/or the host organisation.

WORKING WITH OTHER TRADITIONS AND FAITHS

Chaplains must have respect for the different traditions and practices they find in other Christian Denominations, and with believers of other faiths.

The Chaplaincy role is to be present with whoever they meet and whoever is in need, not just those who do things in a familiar manner.

Chaplains should familiarize themselves with the practices of those faith groups which they are likely to meet, and especially things that may inadvertently cause offence (eg men talking to women & vice versa, touching with the left hand etc).

Pastoral responsibility for everyone in a particular place, and praying for all individuals is a Chaplaincy habit; leaders of other faiths may not naturally work that way. So Christian chaplains may find they take the lead in many local matters but in all cases it is important to remember to take account of all those involved of other traditions and faiths.

We work with others and share common ground in inter-faith activity.

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BEHAVIOUR MANAGEMENT POLICY

1. CIGB's Behaviour Management procedure establishes a process by which breaches of chaplaincy behaviour standards and policies can be dealt with fairly and consistently. The procedure is designed to help and encourage all chaplains to achieve and maintain the best standards. It should be seen as a corrective procedure ensuring all people are treated fairly, and promptly.
2. CIGB can only take action against chaplains directly managed or overseen by them. In the case of chaplains managed by another organization, a written statement of concerns will be handed to that organization for their investigation and action.
3. Informal approach to challenge conduct: some behaviour issues will be resolved through informal discussions between the team leader and the chaplain. The conversations might highlight the apparent shortfall in the person's conduct, and agree a course of action. The team leader will take formal action if: informal procedure does not result in an apparent improvement; the unsatisfactory performance is considered too serious to be classed as minor; or it is a case of misconduct.
4. Chaplains should not be subject to any formal behaviour sanctions without being provided with
 - a. A written statement of concerns
 - b. A hearing before any decision is reached, with a companion attending if desired.
 - c. The right to an appeal.
5. Behaviour Investigation and Hearing:
 - a. Any matter that is reasonably suspected or believed to contravene CIGB's policies or rules, or may otherwise be a behaviour matter, will be investigated promptly – by a Team Leader or Development Director.
 - b. Invitation to a Behaviour Hearing
 - i. If, upon completion of an investigation, there are reasonable grounds to believe that misconduct has taken place, the chaplain will be invited to attend a Behaviour hearing, giving:
 1. a minimum of five working days' advance notice of the hearing;
 2. the purpose of the hearing and details of the nature of the alleged concern
 3. all relevant information (eg witness statements)
 - ii. The chaplain may ask for a companion to attend the hearing with them. The companion has the right to address the hearing, however, there is no requirement for the hearing to permit the companion to answer questions on person's behalf.
 - iii. Where they are unable to attend a behaviour hearing and provide a good reason for failing to attend, the hearing will be adjourned to another day. Unless there are special circumstances mitigating against it, if the person is unable to attend the rearranged hearing, the rearranged hearing will take place in their absence. The companion may attend in such circumstances and will be allowed the opportunity to present their case. The chaplain will also be allowed to make written submissions in such a situation. Where the chosen companion is unavailable on the day scheduled for the meeting, it will be rescheduled, provided that an alternative time within five working days of the scheduled date is proposed.
 - c. The Behaviour Hearing
 - i. The behaviour hearing will normally be conducted by the Development Director. The results of the investigation will be presented and the person will be entitled set out their case and answer any concerns.
 - ii. The hearing may be adjourned if it appears necessary or desirable to do so (including for the purpose of gathering further information). The person will be informed of the period of any adjournment and of any further information gathered.

- iii. As soon as possible after the conclusion of the hearings, the outcome will be conveyed to the person with what action, if any, is to be taken. The decision will be confirmed in writing. Outcomes of a behaviour meeting may include: No action, a (recorded) Oral Warning, a Written Warning, a Final Written Warning, and Withdrawal of Chaplaincy Accreditation, depending on the findings and the severity of the issue.

6. Appeal

- a. The person may appeal against any written sanction or withdrawal of Accreditation, within five working days, by stating:
 - i. the grounds of appeal;
 - ii. if the appeal is against the findings of the investigation into the alleged concerns, or against the level of sanction imposed.
 - b. The appeal will be heard by a Council Member who has not been involved in the decision to impose the sanction. The Appeal will consider any representations made by the person, the person who conducted the investigation and the person who conducted the Behaviour Management hearing and imposed the sanction. The Appeal may also consider any subsequent facts that may have come to light.
 - c. The decision of the Appeal shall be final and will be conveyed in writing.
 - d. Appeal hearings will normally take place within 14 days of receipt of the written notice of appeal.
7. Except in the case of alleged gross misconduct the chaplain will be entitled to remain in post whilst the procedure is pursued.
8. Findings of Written warning or Termination of Chaplaincy Accreditation will be reported to the Management Council.
9. Gross Misconduct – includes, but is not exclusively:
- Serious, direct , wilful breach of any policy, especially Health & Safety, or Equality.
 - Theft or damage to CIGB property or the property of any business / organisation with chaplaincy
 - Incapacity during chaplaincy because of drink or drugs
 - Physical assault
 - Gross insubordination
 - Harassment
 - Being convicted of a criminal offence which is liable to adversely effect the performance or reputation of CIGB

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GRIEVANCE POLICY

1) Introduction

- a) CIGB believes that all workers – paid and voluntary - should be treated, and treat each other, fairly and with respect.
- b) CIGB encourages good communication between all workers and volunteers. This should ensure that issues arising from CIGB team members working together can be discussed and where possible resolved quickly on an informal basis. If not resolved in this manner a grievance can be raised formally in accordance with this procedure.

2) Discipline and Grievance

- a) Complaints that amount to an allegation of misconduct on the part of another person will be investigated and dealt with under the Behaviour Management procedure. If applicable, this would be initiated after the receipt of the formal grievance and initial investigation (see 5.c.ii below)
- b) Complaints that one may have about any behaviour management action taken against them should be dealt with as an appeal under that procedure. Grievances raised while people are subject to behaviour management proceedings will usually be heard only when the behaviour management process has been completed. Insofar as a grievance has any bearing on the behaviour management proceedings, it can be raised as a relevant issue in the course of those proceedings.
- c) A grievance may be withdrawn at any stage.

3) Mediation

- a) It may be appropriate for the matter to be dealt with by way of mediation, depending on the nature of the grievance. This involves the appointment of a third-party mediator, who will discuss the issues raised by the grievance with all of those involved and seek to facilitate a resolution. Mediation will be used only where all parties involved in the grievance agree.

4) The right to be accompanied in grievance meetings

- a) People have the right to be accompanied by a fellow chaplain or companion at any grievance meeting or subsequent appeal.
- b) The choice of companion is a matter for you, but the CIGB reserves the right to refuse to accept a companion whose presence would undermine the grievance process.
- c) At any hearing or appeal hearing, the chosen companion will be allowed to address, but not disrupt the meeting.
- d) Where the chosen companion is unavailable on the day scheduled for the meeting or appeal, the meeting will be rescheduled, provided that you can propose an alternative time within five working days of the scheduled date.

5) Conducting the grievance procedure

- a) CIGB recognises that a formal grievance procedure can be a stressful and upsetting experience for all parties involved. Everyone involved in the process is entitled to be treated calmly and with respect. CIGB will not tolerate abusive or insulting behaviour from anyone taking part in or conducting grievance procedures and will treat any such behaviour as misconduct under the behaviour management procedure.

b) The Complaint

- i) The person with a grievance should put it in writing to their Team Leader in the first instance, who will become the Investigating Officer. The grievance should set out the facts as thoroughly as possible and in an unemotional manner. Dates and times should be included wherever practical and where appropriate.
 - ii) In the event that the Team Leader is the subject of, or might be implicated in the grievance, then the person may write directly to the Development Director, or even to the Chair of the Board, but should set out the reasons for bypassing the manager(s) concerned.
 - iii) The recipient of the grievance will become the Investigating Officer, except that the Chair of the Board will appoint another Board Member for this role. The Investigating Officer will explore the details of the grievance and clarify details as required to ensure that the situation is clearly understood by all concerned.
 - iv) The Investigating Officer will as soon as practicable, and within a maximum of ten working days, arrange a meeting at a mutually convenient time to discuss the grievance.
- c) Informal resolution or mediation
- i) Further attempts may be made to resolve the matter informally or through mediation, depending on the nature of the complaint.
 - ii) At this point, or at a later stage, if the grievance concerns alleged misconduct by another staff, it may be decided to take up the matter under the Behaviour Management Policy.
 - iii) However, if the person is not satisfied with the outcome, they may insist on the matter proceeding to a full grievance hearing.
- d) Further Investigation
- i) Before proceeding to a full grievance hearing, it may be necessary to carry out further investigations. The employee or volunteer may then be invited to present further information to substantiate their grievance. Investigations may require written statements from any chaplain, worker or volunteer who may have relevant evidence. The employee or volunteer with the grievance may be invited to furnish written statements from anyone involved who may be in a position to substantiate claims.
 - ii) Although the confidentiality of the grievance process will be respected, if any evidence is gathered in the course of these investigations, people will be given a copy in sufficient time prior to the hearing for them to consider their response. In exceptional circumstances, the evidence given by individuals may have to remain confidential. Where confidentiality is necessary, this will be explained and an appropriate summary of the evidence gathered will be given.
 - iii) This may take a further ten working days.
- e) Grievance hearing
- i) The hearing will be held as soon as is reasonably practicable and, subject to any need to carry out prior investigations. It will be chaired by the Investigating Officer (or another advisor appointed by the CIGB). At the hearing the complaint will be explored, and what action might be taken to resolve the matter.
 - ii) The chair will intervene if the discussion is straying too far from the key issue and may also intervene to ensure that the meeting can be completed within a reasonable timeframe, depending on the nature and complexity of the complaint
 - iii) If the complainant is unable to attend, they should inform the CIGB as soon as possible. If not, the hearing may take place in their absence.
- f) Decision

- i) The person will be informed verbally of the Chair's conclusion within two working days and a written response which would detail reasons for the decision would be provided within three working days thereafter.
- ii) If they are dissatisfied with the outcome, they may make a formal appeal.

6) Appeal

- a) If the person is not satisfied with the decision then they can make an Appeal to the Chair of the Board within seven working days of written notification of the decision being received. This Appeal must be in writing and must explain the reasons for thinking that an incorrect decision was reached.
- b) The Chair will within ten working days of receiving the appeal arrange for a Sub Committee of three Board Members, which may or may not include the Chair, to come together to consider the Appeal. One of the three Board Members will be appointed as Chair of the Appeal hearing.
- c) The person, who may again be accompanied, will address the hearing and will present their reasons for believing that the original decision was incorrect and should not be upheld. The Chair of the original hearing will then address the appeal hearing and present the reasons for the decision made.
- d) The person will be informed of the Appeal decision verbally by the Chair of the hearing within two working days. A full written response will be provided within four days thereafter giving details of the decision and reasons for it being reached.
- e) The decision of the Appeal panel is final.

7) Sickness or Annual Leave

- a) Where the staff or volunteer is away ill for a short period, or is on holiday, the timescale in this policy will not count for the days that the employee is not available for work.
- b) Where the employee or volunteer is away ill for a longer period, for instance as a result of stress, each case will be dealt with sensitively and on its merits. Emphasis will be put expediting a conclusion without extending the process unnecessarily in the interest of the wellbeing of the employee.

8) Details of Grievance

- a) Once the process set out in this document has been started the subject of the grievance cannot be changed. If another issue then arises it will need to be taken up as a separate grievance.

9) Malicious Grievance

- a) Deliberately false or malicious grievances will be treated as matters of misconduct and will be investigated in line with the Behaviour management policy and procedure.

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COMPLAINTS POLICY

1. Policy statements

CIGB's main form of activity is through the provision of Chaplaincies to workplaces in Birmingham and Solihull. CIGB strives for high standards in service delivery and welcomes feedback from individuals, intermediaries, businesses and anyone who works with us, on all aspects of our services. Such feedback is invaluable in helping us evaluate and improve our work. Complaints will be considered on a regular basis by the CIGB Management Council.

The objectives of the CIGB Complaints Policy are to:

- Ensure everyone knows how to provide feedback and, in particular, how a complaint will be handled
- Ensure that complaints are dealt with consistently, fairly and sensitively within clear time frames
- Provide individuals with a fair and effective way to complain about our work
- Ensure that complaints are monitored and used to improve our services.

CIGB will ensure that we:

- Listen carefully to complaints and treat complaints as confidential, where possible
- Record, store and manage all complaints accurately and in accordance with the Data Protection Act
- Investigate the complaint fully, objectively and within the stated time frame.
- Allow the person complained against a fair right of reply.
- Notify the complainant of the results of the investigation and any right of appeal
- Inform the complainant of any action that will be implemented in order to minimise the likelihood of a re-occurrence

2. Formal Complaints

a. Definition of a Formal Complaint

A complaint is any expression of dissatisfaction by an individual, whether justified or not. An individual may make a formal complaint

IF they feel CIGB (as an organisation, or as an individual chaplain or volunteer) has not provided chaplaincy, or a similar activity, to an acceptable standard; or has failed to act in a proper way.

AND they believe that it is appropriate that formal organisational action is taken to respond to this.

b. Jurisdiction of CIGB

This policy and procedure relates only to complaints received about CIGB and its services. Individuals who make formal complaints about partner organisations will be notified in writing within five working days of receipt of the complaint that they need to complain to the organisation they have the complaint with; and will be provided with contact details, where possible.

c. Formal Complaints Procedure

- i. Any verbal or written formal complaints will be recorded by the member of staff receiving the complaint and be passed through the appropriate Team Leader for recording in the Complaints File held by the Development Director. Any member of staff identified as being the subject or contributing to any matter giving rise to the complaint will be notified within five working days. Feedback on complaints will be shared with employees at appropriate timings.

- ii. There are 2 stages of the complaints procedure:

Stage One – Complaint and Response

Stage Two – Appeal

iii. Stage One

CIGB aims to settle the majority of complaints quickly and satisfactorily through the relevant chaplain or Team Leader. The complaint may be resolved quickly by way of an apology, by providing the service required or by providing an acceptable explanation to the individual. In some cases a complaint may also lead to action being taken against a member of staff under the Behaviour Management Policy.

If the complainant is happy to do so, individuals wishing to make a complaint should contact the person who provided the service. If that is not reasonable they should contact the local Chaplaincy Team Leader, or, finally, the CIGB Development Director. If the complaint is of a sensitive nature, then a meeting may be arranged in an area of privacy with a person of a specified gender.

Chaplains receiving a formal complaint should immediately inform their Team Leader who will pass details to the Development Director in order that complainant may receive updates on progress as required.

Complaints will be acknowledged by CIGB within five working days. Normally complaints will be fully investigated and a response provided to the complainant within 25 working days; however if the complaint leads to disciplinary action under the Behaviour Management Policy, then timescales will be set according to that procedure, which will take precedence. Complainants will be informed if this is the case (or that there may be another reason for delay in delivering a full response) within 25 working days.

Individuals will be advised that if they are not satisfied with the response to their complaint, they may appeal to the CIGB Management Council within 14 working days of receiving their response and progress to Stage Two.

iv. Stage Two

A CIGB Management Council member will investigate the matter independently and communicate the outcome and any action(s) to the complainant in writing within 20 working days of the appeal being lodged. (Occasionally, investigations may take longer, particularly if the complaint is complex. Should this be the case a holding letter will be sent after 20 working days and a final date given for a conclusion being reached.)

This person may need to contact the complainant to clarify the issues, conduct the investigation and explore resolution. The complainant will receive written confirmation of the outcome of any investigation and any recommendations/remedies made, such as, staff development and training, reviewing of policies or appropriate improvement to CIGB services.

3. Informal Complaints

An informal complaint is when a complainant feels dissatisfaction but does not seek a formal response from CIGB. As far as possible, an informal complaint should be addressed to relevant chaplain: if not, to their Team Leader. If the complainant is not satisfied with the response, they may decide to make a formal complaint.

4. Anonymous Complaints

Complaints received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

5. Confidentiality

Confidentiality will be maintained throughout the complaint procedure. Any data recorded following complaints or compliments will be held according to CIGB Data Protection policy.