

Black Country Urban Industrial Mission Policies for Workplace Chaplains

The BCUIM Executive Committee is 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 BCUIM Executive Committee Members, Staff and Chaplains are asked to observe. The BCUIM Executive Committee welcomes feedback on these policies. They will be reviewed at regular intervals, and as necessary.

For further information contact BCUIM Team Leader.

Contents:

1. Code of Behaviour for Chaplains
2. Health and Safety
3. Volunteer Policy
4. Risk Mitigation
5. Safeguarding Policy
6. Data Protection Policy
7. Lone Worker Guidelines
8. Equal Opportunities Policy
9. Behaviour Management Policy
10. Grievance Policy
11. Complaints Policy

The Black Country Urban Industrial Mission is a Private Company, no 5409417.

1. CODE OF BEHAVIOUR FOR WORKPLACE CHAPLAINS

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

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

Chaplains with BCUIM 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 BCUIM'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 in a way which commends their faith and its teaching. Chaplaincy is a 'self-emptying' generosity: Chaplains need to ensure that they set up structures for themselves for their personal emotional and spiritual replenishment. The Team Leader and Executive Committee will assist in this where necessary.

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, if possible. Chaplains are not acting as counsellors, and may make cautious, appropriate suggestions. Where chaplains are qualified as counsellors, any formal counselling sessions which they may offer are not considered part of their chaplaincy. They need to have appropriate supervision and accountability in place.
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; e.g. in keeping appointments and 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.
9. Sensitive to work patterns and not disrupting work unnecessarily, nor breaking local rules.
10. Confidential - even from own faith group, or organisational management, if needed – and with respect to the confidentiality rules of the organisation. *But concerns about possible abuse or serious potential harm must be passed on,* in the first instance to the Team Leader. In some situations, the chaplain may need to share the content of a conversation, ideally after gaining agreement to do so. Confidentiality will be respected within BCUM, except in cases of harm and abuse.
11. 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, and, with the help of the team, Executive and board members .
12. Connecting with a local church and using their experience to feed the life and faith of that church.
13. Maintaining and celebrating integrity; being particularly supportive of those who are vulnerable and powerless; being willing to witness to the causes of significant problems.
14. 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, although they may answer questions honestly and discuss their own faith and beliefs, always engaging respectfully with the people they meet.
15. Observing Health and Safety, Safeguarding and Data Protection regulations, and taking care of their own and others' safety; e.g. taking lone-working precautions (as necessary, see below) and avoiding situations where they may have allegations made against them

16. Taking part in chaplaincy team meetings and de-briefing with colleagues, as appropriate, and being supportive of colleagues; reporting serious incidents to the Team Leader.

17. Managing conflicting relationships, when belonging to more than one organisation. Chaplains should not misuse power, or their position: e.g. for personal gain, nor for exploiting emotional or financial relationships.

2. HEALTH & SAFETY POLICY

The Black Country Urban Industrial Mission does not employ anyone. Those who provide chaplaincy or other services under its auspices may be paid ministers of our constituent churches or volunteers. Ministers or lay people may be seconded for various proportions of their working week from the supporting churches which employ them, or for which they are office holders. Our Volunteer Policy, section 3 deals with the appointment, training and support of volunteers.

BCUIM upholds a Christian concern for the well-being of all people. Health and Safety provisions are therefore important both for our own personnel and those among whom we work. To this end each person fulfilling duties on behalf of BCUIM will be expected to be familiar with and observe this policy..

Much of the work carried out under the auspices of BCUIM is as people fulfil the duties of chaplains in various industrial and commercial workplaces. Each chaplain must:

- Attend a suitable induction, including a Health and Safety briefing, before any new chaplaincy work is undertaken, or any new premises are visited.
- Be fully aware of, and abide by, the Health and Safety Policy of the organisation they are visiting.
- Obtain and wear such high visibility or protective clothing as may be required in the places they visit, either from BCUIM or from the organisation they visit.
- Attend any appropriate Health and Safety training, and be aware of any changes being made to the Health and Safety Policy in the places they visit.
- Be vigilant as to potential hazards in the workplace, and draw them to the attention of local management. In general particular care is needed around warehouses, car-parks, traffic lanes, railway lines, unfenced water or deep water (fenced or otherwise).

Significant accidents or 'near-misses' should be reported in writing both to the management of the local workplace and to BCUIM. Copies of such reports will be kept indefinitely.

Chaplains may often find themselves working alone. Guidelines for "Lone Workers" form a separate section of these policies.

BCUIM organises activities and meetings at various venues. We will ascertain that there is a local Health and Safety policy in force for each of these venues, and we will abide by it. We will perform a basic risk assessment at any new venue. In particular an announcement will be made to all participants regarding evacuation arrangements and any other particular features of the local policy.

Those working at or visiting the BCUIM office will observe the Health and Safety Policy of the Lichfield Diocesan Board of Finance, with BCUIM being an "Outer Office". A first aid kit and accident book will be maintained there.

In the event of anyone being employed by BCUIM, or BCUIM becoming responsible for the self-employed work of people not otherwise employed by a supporting church, the Health and Safety Policy in force will be that of the Lichfield Diocesan Board of Finance, with BCUIM being an “Outer Office”.

3. VOLUNTEER POLICY

Introduction

BCUIM is a company and charity set up and supported by Christian churches with the aim of “connecting church and the economy”. Its main activity is providing workplace chaplains in industry, commerce and the public sector.

We encourage and rely on volunteers, lay and ordained, to act as chaplains and maintain this work. Their presence alongside a reducing number of paid chaplains emphasises that chaplaincy is a ministry of the local church, by the local church, and part of its mission in the community.

Volunteers bring a wide range of experience and skills, as well as perspectives formed through their membership of different churches. As members of a team, we affirm, encourage and inform one another, contributing to our own growth as chaplains and as Christians.

Recruitment

We recruit volunteers from churches in good standing, either as a member or an observer, with Churches Together in England. We publicise our work, and our need for volunteers, by word of mouth, addressing church groups, and by distributing information through denominational channels.

Our volunteer chaplains need to be good listeners, ready to draw alongside people in a variety of life situations, and not easily shocked. They will be people whose character is formed by their Christian faith, people who draw strength from their convictions, but who do not impose their agenda and views on others. They will be people of prayer, patient and ready to “go the extra mile” in the service and support of those they meet in their chaplaincy.

Selection will initially be after an informal interview, but will continue throughout an appropriate training programme as a volunteer’s engagement with others and with the course material is assessed. Training will include a visit with one or more existing chaplains, during which time the volunteer will have the opportunity to share in conversations.

A reference will be requested from a minister at the volunteer’s church.

Chaplains will meet with people who are vulnerable, albeit often temporarily as a result of life experiences. They will therefore be required to have a DBS check. In many cases, if their church acknowledges their role and ministry, a check performed by that church will be satisfactory. Checks obtained through the Anglican Diocese of Lichfield will also be valid. Appropriate safeguarding training will be made available (see Safeguarding Policy). Any payments incurred will be covered by BCUIM.

Chaplains will receive a copy of full BCUIM policies document, at the time in force, and be asked to signify that they have read it.

Training and Induction

Volunteers will come with a variety of different experiences, both in life and Christian ministry. Some may be ordained or licensed ministers. Training will be appropriate for each individual. We welcome volunteers who have received comparable training with other chaplaincy groups or attended college based courses in chaplaincy.

Volunteers will be introduced to their area of chaplaincy, and will be expected to undertake any specific training which the workplace requires.

Additional training in areas of interest to chaplains will be made available from time to time.

Volunteer Formalities

The role and scope of each chaplaincy will be agreed between the BCUIM Team Leader, appropriate management at the location to be visited and the volunteer.

Out of pocket expenses, including mileage (to be paid at the HMRC standard rate), public transport, refreshments necessarily taken whilst acting as a chaplain and the costs training courses, will be reimbursed on receipt of a claim.

On request, chaplains will be provided with a mobile phone with a credit balance, mainly to be used as a dedicated number which they can offer to their chaplaincy contacts.

BCUIM badges and hi visibility clothing are available, although chaplains may find site specific clothing is available and may wish to wear that.

BCUIM maintains third party liability and accident insurance for its chaplains.

Dealing with problems

Separate sections of our policies deal with the behaviour expected of chaplains and provisions should grievances or complaints arise.

4. 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.

BCUIM asks that each individual chaplain completes an assessment of the risks they 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 guidance it is suggested that chaplains consider any likely or dangerous risks which might arise in the course of their chaplaincy visits. This list can then be reviewed once a year by each chaplain. Any particular concerns, for example risks which are not susceptible to appropriate mitigating actions can be raised with the Team Leader or at team meetings

A copy of the risk assessments also needs to be held by Team Leader.

As examples below, we have suggested some possible risks to consider.

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

5. SAFEGUARDING POLICY FOR CHILDREN AND VULNERABLE ADULTS

1. INTRODUCTION

Every child and vulnerable person deserves to be safe and secure in their life and activities. BCUIM 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, and ongoing protection. 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.

BCUIM has put in place safeguards to protect children, young people or vulnerable adults. BCUIM 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. BCUIM 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. BCUIM will work in partnership with the policies and procedures of places where chaplaincy takes place, and other organisations.

2. BCUIM 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. BCUIM 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.

4. CHAPLAINCY CONTACT WITH CHILDREN, YOUNG PEOPLE & VULNERABLE ADULTS

BCUIM 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 outside 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 BCUIM Team Leader 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, BCUIM Team Leader 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 BCUIM Team Leader. All allegations of abuse against a chaplain, however minor, are to be reported to the Team Leader

5. SAFEGUARDING POLICY AND PROCEDURES – DBS CHECKS (*Drawn up and agreed with Lichfield Diocesan Safeguarding Office, January 2017*)

The Executive Committee of the Black Country Urban Industrial Mission will take all reasonable care to ensure the safety of any children, young people or vulnerable adults with whom its chaplains and other team members come into contact during the course of their ministry for BCUIM.

1. The Team Leader, currently Revd. Bill Mash, is our approved Safeguarding Co-ordinator for the calendar year 2019 and he is the point of contact through which concerns about the protection of groups listed above will be channelled. Administrative tasks connected with forms and verification will be the responsibility of the Team Administrator, currently Angela Partoon.

2. The Team Leader is responsible to the Executive Committee for ensuring that these procedures are implemented.

3. The Executive Committee will work towards adopting the relevant recommendations of the House of Bishops such as those published in the Policy for Safeguarding Children *Protecting All God's Children (2010)* and *Promoting a Safe Church (2006)*
4. The BCUIIM Executive Committee will ensure full compliance with Health and Safety Guidelines. Our Health and Safety Policy is available on the resources section of the BCUIIM web site.
5. The Executive Committee is directly responsible for all chaplaincy visits conducted by chaplains and team members attached to BCUIIM.
6. Chaplains and team members must be conversant with the safeguarding policy of the organisations they visit.
7. New chaplains will be required to provide a reference from the minister, or equivalent leader, of a church, in good standing with Churches Together in England, of which they have been a member for at least two years.
8. Before appointment or the continuation of any appointment, chaplains and team members must apply for and supply clearance from the Disclosure & Barring Service. Exceptions may be made where a chaplain already has such clearance through their church and their chaplaincy, whilst it may be linked to BCUIIM, is also seen as a ministry of their church.
9. Completed declaration forms and references will be confidential to and securely held by the Team Leader and the BCUIIM Administrator.
10. BCUIIM will use the Disclosure & Barring Service for checking chaplains' criminal records where appropriate. This will be done via the Safeguarding Office, St Mary's House, The Close, Lichfield. WS13 7LD
11. BCUIIM will maintain a list of its current chaplains and other team members, with details of their roles, and provision for training and support.
12. BCUIIM will provide access to guidance and training in the understanding of child/vulnerable adult abuse.
13. It is important that chaplains and team members avoid any situations where children or young people could be at risk or placed in danger. In practice, in the context of BCUIIM, most concern will be over adults who, for one reason or another, are, at the time, vulnerable. This may be as a result of a permanent or temporary reduction in physical, mental or emotional capacity brought about by life events, for example bereavement or previous abuse or trauma.
14. Chaplains should avoid situations where they feel vulnerable to temptation or where their conduct may be misinterpreted.
15. This will mean that conversations should normally be carried out in public places, or where the chaplain and their contact have the opportunity to attract the attention of others should the need arise. It may be appropriate to have a trusted third person present.
16. Chaplains may occasionally, by appointment and agreement, make visits to people at home. It is advisable to inform someone else (a relative or team member) that they are doing this, and a record should be kept of the date, time and place of the visit, the person visited and the reason. Chaplains should consider carefully whether a visit is appropriate, especially if the person may be alone.

17. BCUIM carries public liability insurance and will insure all chaplains and other team members for personal accident when engaged on chaplaincy visits.

18. This Policy and its procedures will be monitored by the Safeguarding Co-ordinator who will report to the Executive Committee annually at the AGM.

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 - *Physical & Behavioural Indicators*

- 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: Most accidental injuries occur on parts of the body where the skin passes over a bony protrusion.
- 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 - *Physical & Behavioural Indicators*

- Unattended medical need
- Underweight or obesity
- Recurrent infection
- Unkempt dirty appearance
- Smelly
- Inadequate / unwashed clothes
- Consistent lack of supervision
- Consistent hunger
- Inappropriately dressed

- 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 - *Physical & Behavioural Indicators*

- Poor attachment relationship
- Unresponsive/neglectful behaviour towards the child's or vulnerable adults emotional needs
- Persistent negative comments about the child or vulnerable adult
- Inappropriate or inconsistent expectations
- Self harm
- Low self-esteem
- Unhappiness, anxiety
- Withdrawn, insecure
- Attention seeking
- 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 - *Physical & Behavioural Indicators*

- Sign of blood / discharge on the child's or vulnerable adult's clothing
- Awkwardness in walking / sitting
- Pain or itching – genital area
- Bruising, scratching, bites on the inner thighs / external genitalia

- Self harm
- Eating disorders
- Enuresis / encopresis
- Sudden weight loss or gain
- Sexually proactive behaviour or knowledge that is incompatible with a child's age and understanding
- Drawings and or written work that is sexually explicit
- Self harm / Suicide attempts
- Running away
- Substance abuse
- Significant devaluing of self
- Loss of concentration

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:

- 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.

6. DATA PROTECTION POLICY

Introduction

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

These are that information must be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

5. The Data Protection Act 1998 remains in force and 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.

6. 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.

7. BCUIM maintains a Data Protection registration with the Information Commissioner's Office (no. Z2136037)

BCUIM's Data Activity

9. BCUIM 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. BCUIM 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 BCUIM.

b. BCUIM may collect and store data in the public domain in order to supply people and organisations with information about BCUIM.

c. BCUIM 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, BCUIM chaplains and staff will keep data up to date and accurate.

e. BCUIM 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 may inform them of how we intend to use that information. It is as follows:

How we use the information you give us

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

BCUIM will also draw on information in the public domain, and may store that information. BCUIM 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 BCUIM will use information please contact us.

11. Right of access

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

b. People who want to access information held about them should contact the BCUIM 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. We need to deal with requests like this within 21 days.

12. BCUIM Data Security

a. Personal information relating to the involvement of individuals and organisations with BCUIM is stored centrally and by local chaplains.

b. Centrally, the information is stored on the BCUIM office computers, database and filing cabinet. Access to this data is limited to BCUIM staff, Chair of BCUIM Executive Committee, and their agents. Some of this information is considered sensitive. Before disposal, sensitive personnel documents are

shredded.

c. Under arrangements currently in force, regular back-ups of the BCUIM office computers are made by “Broken Stones”, the Lichfield Diocesan IT providers. These are held under their normal secure storage arrangements.

d. Locally, sensitive information is stored by chaplains, workers and volunteers on their computers and local filing systems. These people undertake to keep this data secure, to restrict access to it, and to destroy it confidentially in due time.

e. 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 BCUIM to disclose data (including sensitive data) without the data subject’s consent. These are:

- i. Carrying out a legal duty or as authorised by a 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, but this will, in every case, avoid such detail as would identify individuals
- 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. BCUIM Chaplains may share statistical records, extracted from personal records, with businesses. No personal data, or any material which would identify individuals, will be shared in this way.

14. BCUIM 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, 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 BCUIM 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. The BCUIM Team Leader 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. BCUIM deals promptly and courteously with any enquiries about handling personal information,
- iv. BCUIM describes clearly how it handles personal information,

c. The BCUIM Executive Committee will assess this policy at regular intervals, against best practice and any changes or amendments made to the Data Protection Act 1998.

7. 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 people who are working in the area.

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 encounter that makes you feel anxious, 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 (see section 4, Risk Mitigation)

- a. identify the hazards
- b. decide who can be harmed and how
- c. evaluate the risks and decide on precautions
- d. record your findings and implement them; monitor and update them as necessary.

a. 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

b. Who can be harmed?

Lone-working volunteers and other employees/members of public

c. 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 – e.g. make sure you carry a fully-charged mobile phone, and be aware of areas where there is limited network coverage
- first aid equipment & training
- safe general working practices – e.g. 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.

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

Keep records of the significant findings of your risk assessments (section 4, Risk Mitigation). Discuss any particular concerns with the Team Leader and other team members at regular meetings. Risk assessments and the outcomes to 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 individually in their own homes or in isolated situations. However if this is necessary it should be discussed with the team leader or a 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 attempt to make contact and, if still concerned, 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 report it to the BCUIM Team Leader.

8. Supervisory meetings

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

8. EQUAL OPPORTUNITIES POLICY

BCUIM does not employ anyone. Those who work under its auspices are seconded for various proportions of their working week from the supporting churches which employ them, or for which they are office holders.

BCUIM affirms its commitment to equal opportunities, avoiding discrimination against disadvantaged groups in the areas of employment, training and development.

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.)

BCUIM expects that any people seconded to work under its auspices will be appointed, and continue to hold their position, according to the Equal Opportunities Policy currently in force within their own church. There is a similar expectation of volunteer Associate Chaplains.

Much of the work carried out under the auspices of BCUIM is as people fulfil the duties of chaplains in various industrial and commercial workplaces. Each chaplain must be aware of the Equal Opportunities Policy in force within the organisations they visit.

It is a particular feature of Christian workplace ministry that chaplains may need to:

- Raise any concerns over a failure to properly implement an Equal Opportunities Policy
- Draw attention to any possible inadequacies in a Policy.
- Provide impartial and confidential pastoral support for any people who feel that they have been unfairly dealt with in the context of Equal Opportunities

The basis for appointment to a Chaplaincy post is a balance between BCUIM'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 BCUIM and/or the host organisation.

Recruitment of Staff

Should BCUIM need to recruit staff, on an employed or self-employed basis, the process of recruitment and their continued employment, or period of self-employment on behalf of BCUIM, will be subject to the Equal Opportunities Policy of the Lichfield Diocesan Board of Finance, with BCUIM being an "Outer Office".

BCUIM 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 of Belief) Regulations 2003.)

WORKING WITH OTHER TRADITIONS AND FAITHS

Chaplains must have respect for the different traditions and practices they find in other Christian Denominations, and those of 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 (e.g. 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, especially where we can share in activities which promote well-being, contribute to mutual understanding, reconcile differences and reduce tension within communities.

9. BEHAVIOUR MANAGEMENT POLICY

1. BCUIM's Behaviour Management policy 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 attended to promptly.

2. BCUIM can only take action in the case of chaplains directly managed or overseen by them. For 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 BCUIM's policies or rules, or may otherwise be a behaviour matter, will be investigated promptly – by the Team Leader or member of the Executive Committee, as appointed by the chair.

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:

- a. a minimum of five working days' advance notice of the hearing;
- b. the purpose of the hearing and details of the nature of the alleged concern
- c. all relevant information (e.g. witness statements, redacted to remove personal details if necessary)

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 Team Leader. 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 Hearing, 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 Hearing 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 at least 2 Executive Committee Members who were 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 Executive Committee .

9. Gross Misconduct – includes, but is not exclusively:

-Serious, direct, wilful breach of any policy, especially Health & Safety, or Equality.

-Theft or damage to BCUIM 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 affect the performance or reputation of BCUIM

10. Church membership and good standing – Prior to commencing chaplaincy, BCUIM will obtain a reference and recommendation from the minister of the volunteer's church. We operate in partnership with local churches and it is important that volunteers remain members in good

standing with their church. Should a minister express concerns about a volunteer's conduct within the church, or their good standing as a member of that church, the Team Leader will meet and discuss the concerns. If the minister no longer feels able to endorse and support the volunteer's chaplaincy ministry, it may be necessary to withdraw the accreditation of the chaplain, either temporarily or permanently. The volunteer will have the opportunity to make their position and views known in this process.

11. GRIEVANCE POLICY

1. Introduction

- a. BCUIM believes that all workers – paid and voluntary - should be treated, and treat each other, fairly and with respect.
- b. BCUIM encourages good communication between all workers and volunteers. This should ensure that issues arising from BCUIM 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.
- 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 the chaplain, but BCUIM 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 the meeting.
- d. The chosen companion shall not disrupt the meeting and if they do so, will be asked to withdraw.
- e. 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. BCUIM 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. BCUIM 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 the 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 Chair of the Executive Committee, but should set out the reasons for this.

iii. The Chair of the Executive Committee will appoint another Executive Committee Member to be the Investigating Officer. 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

Further attempts may be made to resolve the matter informally or through mediation, depending on the nature of the complaint. 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, subject to any need to carry out prior investigations. It will be chaired by the Investigating Officer (or another advisor appointed by the BCUIM Executive Board). 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 BCUIM 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 Investigating Officer'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 Executive Committee 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 Executive Committee Members, which may or may not include the Chair, to come together to consider the Appeal. One of the three Executive Committee 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 Investigating Officer 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 Appeal Subcommittee 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 Subcommittee is final.

7. Sickness or Annual Leave

- a. Where the employee 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 they are 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 or volunteer concerned.

8. Details of Grievance

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

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.

12. COMPLAINTS POLICY

1. Policy statements

BCUIM's main form of activity is the provision of Chaplaincies to workplaces in the Black Country.

BCUIM 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 BCUIM Management Council. The objectives of the BCUIM 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.

BCUIM will:

- 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 against whom a complaint is made to have 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 reoccurrence.

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 (as an organisation, or as an individual chaplain or volunteer) feel BCUIM 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 BCUIM

This policy and procedure relates only to complaints received about BCUIM 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 with which they have the complaint, 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 Team Leader and placed in a complaints file held at the BCUIM office. Anyone 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 those concerned at appropriate timings.

ii. There are 2 stages of the complaints procedure:
 Stage One – Complaint and Response Stage Two – Appeal

Stage One

BCUIM 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.

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 BCUIM Team Leader. 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 the Team Leader in order that complainant may receive updates on progress as required.

Complaints will be acknowledged by BCUIM 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, then timescales will be set according to that procedure, which will take precedence. Complainants will be informed if there is a delay in responding to the complaint.

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

Stage Two

A BCUIM Executive Committee 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 BCUIM services.

3. Informal Complaints

An informal complaint is when a complainant feels dissatisfaction but does not seek a formal response from BCUIM. As far as possible, an informal complaint should be addressed to the relevant chaplain: if not, to the 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 BCUM Data Protection policy.