

Policy Name:	Complaints Mechanism Policy				
Section #:	EL-8	Section Title:	Executive Limitations - Ethical Behaviour	Issued:	October 2020
Approval Authority:	Elder Board	Adopted:	November 2020	Reviewed:	
Accountable Executive:	Lead Pastor	Revised:			
Accountable Department:	Human Resources	Contact:	Human Resources Director		

Purpose

The *Complaints Mechanism Policy* allows that all stakeholders may provide feedback pertaining to Riverwood Church Community (Riverwood) programs and services for the purpose that such complaints may be heard and properly addressed. Riverwood is committed to providing services and programs that are in line with our values, in an environment that is safe: physically, emotionally, spiritually and financially. A complaints mechanism allows for Riverwood to address and improve upon the delivery of all its services and supports to the community, and to its staff and volunteers.

Policy Statement

The core values of Riverwood are deeply rooted in the Biblical principles of dignity, justice, transparency and accountability.

Riverwood has zero tolerance on any form of abuse of power, sexual misconduct, fraud and corruption, physical and psychological abuse and criminal offences.

The Riverwood Code of Conduct serves to guide all Riverwood staff and volunteers in their attitudes, behaviours and ethical decisions in their professional as well as private lives.

Riverwood takes complaints seriously and constructively. It shall address all issues of sexual misconduct, abuse of power, corruption and breach of Riverwood policies, practices and standards.

Riverwood is committed to having an effective procedure for handling and responding to complaints. Procedures shall be simple, easily understood and widely publicized.

No staff or volunteer shall retaliate against the complainant in whole or in part because they have disclosed alleged wrongful conduct. Any staff or volunteer that is found to have violated this principle will be subject to disciplinary action up to and including termination.

Both complainants and accused have a right to challenge decisions and to be properly informed about the basis on which decisions have been made. Every effort will be taken throughout the process to maintain confidentiality.

When necessary, it is particularly important to ensure that support is available to complainants in ways deemed appropriate.

All policies are subject to amendment.

Policy Application

In matters of less serious situations dealing with preference, opinion or personal offence, staff, volunteers and Riverwood congregants are encouraged to follow the Matthew 18 procedure of resolving conflict.

In matters of more serious situations and complaints, staff, volunteers and Riverwood congregants need to be aware of the policy and procedure that will be followed to address and resolve complaints, including who the specific Responding Leader is and corresponding timelines to deal with complaints.

Responsibilities

A complaint could be raised by

- (a) an individual or group with whom Riverwood works;
- (b) a staff or volunteer serving at Riverwood; or
- (c) a church congregant or member of the public.

Means to Issue a Complaint

Complaints may be made by any of the following means

- (a) **in person** (verbally or in writing, including anonymous submissions);
- (b) **through a trusted intermediary** (in writing); or
- (c) **electronically** to an assigned confidential e-mail (e.g. *complaints@riverwood.cc*).

Complaints will be brought to the most senior leader of the ministry area and/or Lead Pastor or their designate. This person will become the Responding Leader.

In the case where the Subject of the Complaint is the Lead Pastor or a family member of the Lead Pastor, the complaint will be brought to the Chair of the Elder Board.

Timeline for Reporting a Complaint

Complaints are to be reported immediately or as soon as possible.

Steps to Process a Complaint

All complaints will be processed in a fair and professional manner, using the following steps:

1. Initial Complaint Review

When a complaint is received it will be reviewed by the Responding Leader. If appropriate, the 'Complaint Handling Committee' (CHC) will be convened to process the complaint.

2. Notify Complainant

A written acknowledgement that a complaint has been received is drafted by the Responding Leader and also forwarded to the CHC.

The written acknowledgement is written communication to the complainant informing them that Riverwood has received the complaint and summarizing the actions Riverwood will take. The acknowledgement letter will be in writing, concise and clear. If there is any indication that a complainant does not want follow up communication, or if Riverwood believes that such may put the complainant or others at risk, it is possible to confirm receipt orally.

Acknowledgement Letter states

- (a) when and how Riverwood received the complaint;
- (b) who in Riverwood is responsible for acting on the complaint; and
- (c) who the complainant should contact regarding questions or feedback.

3. Identify Risks and Provide Protection

At the initial contact with the complainant, the Responding Leader will find out whether the complainant or anyone else is immediately or potentially at risk. Risks will be addressed and any security concerns will be referred to the Safety Team Coordinator (or their designate) as well as to the Senior Leaders. Adequate and rapid protection and security measures must be provided to the person initiating the complaint, to ensure that they are protected from any possible reprisals.

4. Take Action

The CHC will meet to undertake these steps

- (a) determine if an investigation is required; and
- (b) if required, an investigation will be launched.

5. Follow-up with Complainant

The completion of the investigation will be communicated to the Complainant, within 15 days after the final report or as soon as possible.

The Responding Leader is responsible for communicating the outcome of the investigation to the complainant. This is to be done in writing.

6. Appeal Process

If the Complainant or the Subject of the Complaint is not satisfied on the resolution of the complaint, they may lodge an appeal within 15 days upon receipt of the conclusion. An appeal will be treated as a new complaint.

An appeal shall be considered only once.

Definitions

“Complaint” - A complaint is an expression of concern or dissatisfaction by an individual or a group, related to possible misconduct by Riverwood. This could be in relation to program activities or conduct of its personnel, how Riverwood operates in relation to various communities, or violations of Riverwood’s policies and/or guidelines.

A complaint may express concern about, but not be limited to

- (a) how a service has been managed and its direct impact on the communities and affected population;
- (b) a concern about the behaviour of staff, a volunteer, a constituent or independent third party;
- (c) abuse of power manifested against those with less social power and how they are treated physically and or psychologically;
- (d) staff members involved in corruption or abuse of one's position for private gain, such as misusing the financial and other resources of the organization;
- (e) staff members in a supervisory capacity giving direction that would result in improper actions;
- (f) sexual coercion and manipulation (including all types of sexual acts) by a person in a position of power providing any type of assistance in exchange for sexual acts; or
- (g) sexual harassment or unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual, by any person to another individual.

"Complainant" - is the person, group or company that makes a complaint.

"Responding Leader" - is the Riverwood leader responsible for handling the complaint in accordance with this policy.

Consequences of Non-Compliance

Every complaint is entitled to due process. Failure to process a complaint will result in disciplinary action up to and including termination.

Malicious Complaints

Riverwood acts under the assumption that all complaints are made in good faith and are not motivated with the intent for personal gain, personal interest or a grudge. If a malicious complaint is disclosed, any investigation shall be stopped immediately. If a malicious complaint was made by a Riverwood employee or volunteer, it will result in disciplinary action up to and including termination.

Retaliation

Riverwood staff, volunteers, and congregants may bring forward a complaint without any fear of retaliation. Retaliation against a complainant will result in disciplinary action up to and including termination.

Privacy and Confidentiality

Legislation applicable to various types of complaints changes from time to time. In applying this policy Riverwood will comply with all relevant legislative requirements as they may exist at the time.

Riverwood recognizes that confidentiality is critical to a satisfactory outcome, as it protects the privacy and safety of the concerned individuals. The facts and nature of the complaint, the identity of the key participants, and the investigation records will remain confidential at every step of the resolution process. Furthermore

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- (a) information will not be disclosed unless the person who has provided the information has given written, explicit consent to disclose the information;
- (b) in accordance with Provincial and Federal legislation, Riverwood has a legal obligation to report certain types of violations and will do so without hesitation;
- (c) particular care must be taken where the complainant's record contains information provided in confidence by, or about, a third party who is not a Riverwood employee; and
- (d) disclosure of information provided by a third party outside Riverwood also requires the expressed consent of the third party. If the third party objects then the information can only be disclosed where there is an overriding public interest in doing so. It is not appropriate for someone to make this decision on their own. Legal or other advice must be sought.

Riverwood shall only allow disclosure when:

- (a) it is required or permitted by law; or
- (b) it is required by management in the best interest of the organization and parties involved.