



Complaints Policy

Approved by Trustees: 22/09/2026
Review due by: September 2027

1. Introduction

- 1.1 The purpose of this policy is to set out clearly how the Archdiocese of Liverpool (the “**Archdiocese**”) assesses and responds to complaints. We take all complaints seriously and aim to deal with them promptly and fairly. Wherever possible, we seek reconciliation and to repair relationships.
- 1.2 This policy applies to complaints received from clergy, volunteers, parishioners, visitors and any other individuals coming into contact with the Archdiocese and those who represent it.
- 1.3 The following are outside the scope of this policy and should be dealt with in accordance with the corresponding procedures and/or policies:
 - (a) complaints from staff;
 - (b) whistleblowing complaints;
 - (c) fundraising complaints;
 - (d) complaints involving alleged criminality (these should be referred to the statutory authorities);
 - (e) complaints relating to catholic schools (these should be referred to the relevant school);
 - (f) safeguarding concerns or allegations (which may also be referred to the statutory authorities); and
 - (g) complaints regarding the actions of the safeguarding team.
- 1.4 Any information or documentation that is obtained during the handling of a complaint will be managed in accordance with the Archdiocese’s Confidentiality and/or Data Protection processes, as applicable.
- 1.5 The Archdiocese may have legal and/or regulatory obligations to disclose the existence and nature of any complaint to the police and other statutory or regulatory agencies, including the Charity Commission, if a complaint reaches the reporting threshold.
- 1.6 Financial compensation is not available via the complaints process. If compensation is the desired outcome, legal advice should be sought regarding any potential claim for compensation

2. What is a Complaint?

- 2.1 For the purposes of this policy, a complaint is an expression of dissatisfaction about something the Archdiocese, its clergy, trustees, staff, volunteers or anyone acting officially on behalf of the Archdiocese has done or failed to do.

- 2.2 A complaint does not include complaints about parishioners or others unless they were acting in the course of a role that had been officially assigned to them either by a parish or by the Archdiocese. However, if the Archdiocese considers it necessary, we reserve the right to use this policy to deal with complaints about parishioners even when not acting in a role that has been officially assigned to them.
- 2.3 The Archdiocese is committed to putting things right when a complaint is raised. If we fail to meet our high standards, we want to hear about it so that we can respond to any concerns raised and learn lessons for the future.

3. Who can make a complaint?

- 3.1 Anyone affected by something the Archdiocese or someone acting on behalf of the Archdiocese has done or failed to do can make a complaint.
- 3.2 Complainants must be identifiable and must provide their name, residential address, email address and/or telephone number. Anonymous complaints or complaints made by a person who cannot be identified will not be responded to.
- 3.3 If, for any reason, an individual is unable to make a complaint themselves, a representative (such as a friend or family member) may make a complaint on their behalf. In this case the representative should explain why the complainant is unable to make the complaint themselves. The Archdiocese may need to contact the complainant directly to confirm that they have consented to the representative acting on their behalf and to obtain or check their contact details (per paragraph 3.2).

4. How to make a complaint

- 4.1 Complaints should usually be made within three months of the event being complained about. This is because if more than three months have passed since the event complained about, it may not be possible for the complaint to be investigated fairly. The Archdiocese reserves the right not to investigate complaints made outside this timeframe.
- 4.2 All complaints must be made in English and in writing to complaints@rcaol.org.uk even if the complaint has previously been discussed on the telephone or in person. If necessary, the Archdiocese may be able to assist an individual to frame their complaint and to provide the information required (per paragraph 4.3).
- 4.3 To help resolve the complaint efficiently and fairly, the following information must be provided before a complaint can be actioned:

- (a) complainant's full name (and if applicable, the name of their appointed representative);
- (b) complainant's contact details (and if applicable, contact details for their appointed representative);
- (c) preferred method of contact (e.g. telephone or email);
- (d) complainant's relationship to the Archdiocese (e.g. parishioner, volunteer, member of the public);
- (e) the name of the person(s) about whom the complaint is being made, if known;
- (f) a detailed description of the complaint, including dates and times of any reported incidents;
- (g) details of any witnesses to the relevant incident(s);
- (h) details of any person or body to whom the matter has already been reported;
- (i) details of what has been done to try and resolve the issue so far;
- (j) copies of any documents related to the complaint;
- (k) any additional information considered relevant;
- (l) what resolution the complainant is seeking.

If the above information is not provided, the Archdiocese reserves the right not to investigate the complaint further.

- 4.4 In most cases, the Archdiocese will need to share information and/or documentation about the complaint, including the identity of the complainant, with the person about whom the complaint has been made. It may also be necessary to share it with third parties (e.g. witnesses) to ensure that the complaint can be investigated properly and fairly.
- 4.5 If it is considered necessary to share confidential or personal information outside of statutory and regulatory obligations and the requirements prescribed in paragraph 4.4, the Archdiocese will seek the complainant's consent before doing so. If consent is not provided, the Archdiocese may not be able to proceed any further with the complaint.

5. The Complaints Handling Process

- 5.1 Complaints will be acknowledged in writing within 5 working days of receipt.
- 5.2 An assessment of the complaint will be undertaken to determine whether it falls within the scope of this policy. If not, the complainant will be informed that the complaints process is not applicable and will be advised if an alternative process may apply. If it is determined that the complaint falls under this policy, the process set out below will then be followed:
- 5.3 Stage One: Informal Resolution

- (a) In the majority of cases, the complaint will be referred to the Parish

Priest/Nominated Person in the parish/diocesan department to which the complaint relates. The Parish Priest/Nominated Person will aim to resolve the complaint informally in the manner that is considered most appropriate.

- (b) Following this informal process, we will confirm with the complainant that they are satisfied with the proposed resolution, and the complaint will be resolved. It is expected that this process will take around two weeks.

5.4 Stage Two: Formal Investigation

If the complaint is not resolved informally, the complainant can ask the Archdiocese to investigate the complaint.

- a. If the complaint relates to a clerical or liturgical issue, it will be referred to the Vicar General for investigation, which may include consideration of the complaint under the Code of Canon Law.
- b. If the complaint does not relate to a clerical or liturgical issue, it will be referred to a Complaints Officer for investigation. The Complaints Officer will usually be a member of Archdiocesan staff.
- c. At the sole discretion of the Archdiocesan Trustees an independent external investigation may be commissioned.

Once the complaint has been referred to the Vicar General or Complaints Officer for investigation, the following process will be followed:

- i. The complainant will be informed that the complaint has been referred, and they will be provided with the name and contact details of the Vicar General or Complaints Officer, as applicable.
- ii. The complaint will be investigated to establish the relevant facts. All relevant evidence provided will be reviewed and other evidence may also be gathered, where considered appropriate. This may include asking for further information from the complainant or speaking to other individuals involved.
- iii. Where a complaint relates to a member of the clergy, staff or another individual appointed to a role in the Archdiocese/Parish (e.g. a trustee or volunteer), they will usually be informed of the complaint made against them and given an opportunity to respond.
- iv. Where appropriate, consideration will be given to whether the complaint should be reported to a statutory agency, relevant regulator or other authority.
- v. We normally aim to provide a full response to complainants within 30 working days of the complaint being referred to the Vicar General or Complaints Officer for investigation, but the timescale in each case will depend on the complexity of the complaint, availability of individuals etc. The complainant will be kept updated as to the progress of the complaint throughout.
- vi. The complainant will be provided with the outcome of their complaint in writing. This will include reasons for the decisions made. If the complaint

or any aspect of it is upheld, any steps necessary to bring the matter to a resolution will be set out.

- 5.5 The complaints process relies upon reasonable cooperation between the complainant and the Archdiocese. Where a complainant/their representative fails to respond to attempts to contact them in relation to the complaint, after the third unsuccessful attempt, the Archdiocese reserves the right to end the complaints process. Equally, complainants should refrain from repeatedly seeking updates at unreasonably short intervals, which will only delay the progress of the complaint and could result in the complaint being treated as vexatious (per Section 8).
- 5.6 If a complainant initiates another process during the course of the Archdiocese's handling of their complaint, including a Subject Access Request or a legal claim, the complaints process may be paused or ended at the Archdiocese's discretion.
- 5.7 If the Archdiocese receives a number of inter-related complaints or a number of people make the same or substantively similar complaints, it may be decided to consolidate the investigation into the complaints or treat an investigation into one of the complaints as an investigation into all of the complaints.

6. Appeal

- 6.1 If a complainant is dissatisfied with the outcome of the complaint investigation after Stage 2 above, they may be able to request an appeal. An appeal may not be sought simply because the complainant disagrees with the outcome of their complaint.
- 6.2 An appeal may only be sought if the complainant can evidence at least one of the following grounds:
 - (a) Procedural error: This complaints process was not followed correctly, which may have affected the outcome.
 - (b) Failure to consider evidence: Material evidence submitted during the investigation was overlooked or not properly considered, which may have affected the outcome.
 - (c) Bias or conflict of interest: The decision was influenced by bias, conflict of interest, or improper motive.
 - (d) Unreasonable decision: The outcome was not reasonable or proportionate based on the evidence provided.
- 6.3 An appeal must be requested via email addressed to complaints@rcaol.org.uk within 10 working days of the date on which the written investigation outcome is received by the complainant.

- 6.4 The request must set out how the complaint satisfies one or more of the grounds set out in paragraph 6.2 for an appeal to be considered. Any documentation or correspondence considered relevant should be included.
- 6.5 The appeal process will be as follows:
- (a) The request for an appeal will be considered by a Reviewer, who will be a senior member of staff or clergy or a trustee not involved in the investigation of the complaint.
 - (b) The Reviewer will determine whether the appeal is accepted on one or more of the grounds set out at paragraph 6.2. This decision will be based on the evidence presented by the complainant in their request for an appeal.
 - (c) All appeals are strictly limited to a paper-based review of the complaint investigation. Appeals are not re-investigations of complaints and no new interviews or meetings will take place. The Reviewer will only examine the existing records, including the original complaint submission, evidence gathered during the investigation, final response letter and the request for an appeal submitted by the complainant.
 - (d) If an appeal is accepted, we will normally aim to provide the appeal outcome to the complainant within 30 working days of the request for an appeal being accepted by the Reviewer. However, the complainant will be advised as to a timeframe for the appeal outcome and will be kept updated.
 - (e) The complainant will be provided with the outcome of the appeal in writing. This will include the reasons for the decisions made. If the appeal or any aspect of it is upheld, any steps necessary to bring the matter to a resolution will be set out.
 - (f) The appeal outcome will be the final decision. Even if the complainant remains dissatisfied with the appeal outcome, there will be no further right of appeal, and the matter will be at an end.
 - (g) Should a complainant make a further complaint on substantively similar grounds to the original complaint, the Archdiocese reserves the right to reject the complaint.

7. Escalation Points

If a complainant remains dissatisfied with the response of the Archdiocese to their complaint, they may wish to escalate the complaint to one of the following external organisations, where applicable:

Charity Commission:

<https://forms.charitycommission.gov.uk/raising-concerns/>

Information Commission:

<https://ico.org.uk/make-a-complaint/>

8. Persistent, Serial and Vexatious Complaints

- 8.1 This policy serves to address genuine complaints. There can be rare occasions when complainants seek to use our procedures inappropriately and/or in ways that are designed to cause distress, disruption, or nuisance.
- 8.2 Where complainants are persistent with their complaints despite having exhausted the stages set out in this policy, we reserve the right to refuse to engage further with them. In addition to refusing to deal with a persistent complainant, we reserve the right to reject a vexatious complaint.
- 8.3 Vexatious complaints may be characterised as (but are not limited to) the following:
- (a) complaints which are obsessive, persistent, harassing, prolific, repetitious;
 - (b) insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;
 - (c) insistence upon pursuing meritorious complaints in an unreasonable manner;
 - (d) complaints which are designed to cause disruption, annoyance or offence; and/or demands for redress that lack any serious purpose or value.
- 8.4 We will consider each complaint on a case-by-case basis before determining that it is vexatious. We will inform complainants if we believe their actions are in contravention of this policy and, if appropriate, give them an opportunity to change their conduct and/or the terms under which they seek to pursue their complaint.
- 8.5 We will be mindful of the following when deciding whether a complaint is vexatious and, if any of these features are present in an individual case, it will weigh more heavily in favour of deciding to refuse to engage any further with the complainant:
- (a) communications through various means are often or consistently aggressive and abusive;
 - (b) insulting personal comments, aggression or threats to take action or cause harm are targeted against individuals; and/or
 - (c) there is clear reason to believe that the complainant is contacting us with the intention to cause disruption or inconvenience.
- 8.6 Where we have determined that a complaint, or an element of a complaint, is vexatious we will confirm that we are not dealing with the complaint on that basis and will set out the reason for our determination.
- 8.7 If a vexatious complainant persists with their allegations despite a determination having been made under this section of our policy, the complainant may be engaging in a course of conduct that amounts to harassment. We reserve the right to refer such matters to the Police and/or our legal advisors in order to consider

whether the provisions of the Protection from Harassment Act 1997 have been triggered and/or there has been any other contravention of the law.

9. Recording of Calls and Meetings

- 9.1 The Archdiocese reserves the right to audio-record telephone calls and meetings with complainants for any of the following purposes:
- (a) to protect our staff from abusive, blasphemous or nuisance calls;
 - (b) to ensure we have a fair and accurate record of the complaint and to assist in the resolution of the complaint; and/or
 - (c) to help improve the services that we provide.
- 9.2 **For telephone calls:** Where possible, we will inform the caller that the call is being monitored/recorded for the reasons stated above so that they have the opportunity to consent by continuing with the call or to hang up.
- 9.3 **For meetings:** We will seek your agreement prior to recording. If recording is necessary for the fair resolution of the complaint, we will notify you in advance.
- 9.4 **Covert recordings:** We do not permit covert (secret) recordings of calls or meetings by either party. If we become aware that a call/meeting is being covertly recorded we will end the call/meeting and consider whether we are prepared to continue with the complaints process.
- 9.5 Recordings will strictly be used for the purposes set out in paragraph 9.1, will be held securely and will only be accessible by individuals with a legitimate need to access them.
- 9.6 All recordings containing personal data will be processed, stored, and deleted in accordance with the Archdiocese's Privacy Notice and current data protection legislation.

10. Monitoring and Recordkeeping

- 10.1 The Archdiocese will maintain a Register of Complaints, which will include details of each complaint, the date it was received, details of any investigations undertaken and copies of all communications relating to the complaint.
- 10.2 Complaint records will be retained in accordance with the Archdiocesan Data Retention Schedule and for at least 12 months from the date that the complaint was made.

- 10.3 At each meeting of the Archdiocesan Audit and Risk Committee there will be an agenda item for consideration of new complaints received and ongoing complaints.

11. Policy Review

- 11.1 This policy was approved by the Archdiocesan Trustees on 22/09/2026.
- 11.2 This policy will be reviewed on an annual basis and revised in response to updated legislation and guidance and lessons learnt from complaints received.

12. Contact

If you have any queries or comments about the contents of this policy, please contact:

Complaints Officer

Archdiocese of Liverpool,

St Margaret Clitherow Centre, Croxteth Drive, Liverpool, L17 1AA

complaints@rcaol.org.uk

13. Document Control

The control copy of this policy is saved in the Policies SharePoint.