

Complaints against licensed lay ministers

Resolving Concerns,
Complaints, and Grievances
Concerning LLMs.



The Church of England
Diocese of Ely

Resolving Concerns, Complaints, and Grievances involving LLMs

1 Purpose of this document

1.1 This document aims to:

- i. Set out clear and consistent guidelines for dealing with concerns, complaints, and grievances relating to the ministry and/or conduct of Licensed Lay Ministers (LLMs) in their settings across the Diocese.
- ii. Promote good working relationships between LLMs, clergy, Authorised Lay Ministers and members of church communities.
- iii. Equip people to resolve any concerns or expressions of dissatisfaction quickly, and at a local level if possible.

2 Background

- 2.1 It is important to remember that LLMs are not employees of the church, nor do they have any of the usual employment-related contracts. However, through their vocation, training, licences, and roles as pastors, spiritual guides, and representatives of the faith, LLMs have a position of trust and privilege in the church and in their communities.
- 2.2 It is central to the teaching of Jesus that those who are reconciled to God must be open to being reconciled to those who have offended them or to those they have offended.
- 2.3 Reconciliation involves clarification of what has happened, how it is perceived by the other person, and acknowledgement of the depth of anger and hurt. Reconciliation also involves the rebuilding of damaged relationships, where possible.
- 2.4 Concerns, complaints, and grievances should be treated seriously because of their significance to those concerned.
- 2.5 The best outcome is for disputes and concerns to be resolved at a local level where possible.
- 2.6 It needs to be understood that following a complaints or grievance procedure is not 'failing', but helping to sort our differences and find solutions which work better for those involved.

3 Scope

- 3.1 The scope of these procedures is to cover issues of LLM misconduct, or issues that arise between LLMs, other ministers, and members of church communities. Misconduct is defined as a breach of the **Code of Good Ministerial Practice**.

- 3.2 The scope of these procedures is limited to behaviours and issues that do not amount to serious misconduct. Matters of serious misconduct will be dealt with under the **disciplinary procedure**. Serious misconduct is defined as:
- (i) Repeated and continued breaches of the **Code of Good Ministerial Practice**, even where this has been pointed out and support has been put in place.
 - (ii) Serious incidents such as financial misconduct, bullying behaviour, and discrimination. These may be isolated incidents or part of a larger pattern of behaviour.
 - (iii) Behaviour that meets the safeguarding threshold (see 3.3).
 - (iv) Illegal activity (see 3.4).
- 3.3 If a report is made of safeguarding concerns relating to an LLM, the matter will first be dealt with following the safeguarding procedures of Ely Diocese. The safeguarding e-manual can be found at: <https://www.churchofengland.org/safeguarding/safeguarding-e-manual>
- 3.2.1 If the matter does not meet the safeguarding threshold, it will be referred to the Team Around the Parish. The Team Around the Parish may refer the matter to the Warden of LLMs (Warden) and Lay Ministry Team Leader (LMTL), who will consider whether the issue should be dealt with under the concerns or complaints procedures.
- 3.2.2 If the matter does meet the safeguarding threshold, it will be investigated following safeguarding procedures. On the basis of this investigation, the Director of Mission and Ministry (DMM) may, in consultation with the Bishop, initiate the **disciplinary procedure**.
- 3.2.3 In some circumstances, the safeguarding team may make a direct recommendation to the Bishop that an LLM's license be revoked (following the procedures laid out in [Canon E6](#)). In such cases, the Warden will be notified.
- 3.4 Where there are legal issues at stake, the Warden, LMTL, and/or DMM will notify the Bishop and discuss the matter with the Diocesan Registrar.
- 3.4.1 As a result of investigation into the issues, the DMM (in consultation with the Bishop) may decide to initiate the disciplinary procedure.
- 3.5 This document applies to LLMs-in-training only in relation to issues arising in the context of their parish or benefice. Issues arising in the context of Theological Education Institutions (TEIs), whether relating to attendance at course events, relationships between trainees and tutors, or academic misconduct, are subject to the policies and procedures of TEIs.

4 The initial steps to resolve a concern about an LLM

- 4.1 This section outlines the first step to take when dissatisfaction or concerns are expressed about an LLM. It is hoped that this initial process can resolve the concern, and so limit further harm or breakdown of relationships. Therefore, this process should be implemented before moving to the complaints procedure.
- 4.2 In the first instance, any person who has a concern regarding an LLM should discuss it with them directly, if possible, in order to seek a swift and acceptable resolution.
- 4.3 If no agreement has been reached during this meeting, then the LLM and/or the other person should inform the LLM's supervisor (this is often, but not always, their Incumbent).
- 4.4 The supervisor will meet with each person to discuss the concerns. They will engage in conversations with the LLM about what has happened, and to agree a plan of action towards resolution. When making a plan of action, supervisors should consult the **Guidance for Creating a Plan of Action Towards Resolution** [Appendix 1].
 - 4.4.1 If this achieves improvement, then the matter is resolved.
 - 4.4.2 If the LLM does not agree to the plan of action, there is no resolution, or concerns persist, the LLM's supervisor should write to the Warden to make a complaint. The Warden will then begin the **complaints procedure** (5).
- 4.5 If someone feels that their concerns are not being taken seriously by the LLM or their supervisor, they may write directly to the Warden, detailing their concerns and the steps they have taken to resolve them. The Warden may decide to initiate the **complaints procedure** (5), contacting the LLM and their supervisor to discuss the concerns and explore ways of resolving these issues, as described in 5.5.
 - 4.5.1 If the Warden decides not to initiate the complaints procedure, they should write to the complainant explaining their decision within 14 days of the appeal.
 - 4.5.2 If the Warden deems that there has been serious conduct on the part of the LLM, they should refer the matter to the DMM. The DMM, in consultation with the Bishop, may decide to initiate the **disciplinary procedure**.
- 4.6 If a supervisor has a concern about their LLM, they should meet with the LLM to discuss the issue and make a plan of action towards resolution, using the guidance in Appendix 1.
 - 4.6.1 If the LLM agrees to the plan of action, and there is sufficient improvement in conduct, practice, and/or behaviour, the matter is considered resolved.
 - 4.6.2 If the LLM does not agree to the plan of action, or the plan of action does not lead to sufficient improvement in conduct, or concerns persist, the supervisor should write to the Warden to make a complaint. The Warden will then begin the **complaints procedure** (5).

5 The complaints procedure

- 5.1 To make a complaint, the LLM's supervisor should write directly to the Warden, stating the issues and the steps that have been taken to resolve the matter. The supervisor should inform the LLM that they are making a complaint.
- 5.2 Within 7 days of receiving the complaint, the Warden should write to the LLM. They should inform them of the complaint and its substance, and of the next steps. The Warden may deem it necessary to ask the LLM to pause their ministry whilst the complaints process is handled. The Warden will communicate this to the LLM in writing. This is not to be understood as a disciplinary measure but is intended to provide space to undertake the complaints procedure outside the public gaze.
 - 5.2.1 The Warden should also contact the Area Sub-warden, who will provide pastoral support for the LLM throughout the process.
- 5.3 The Warden will inform the LMTL of the complaint. The complaints procedure will normally be handled by both the Warden and LMTL. In the case of a conflict of interest, either role may be fulfilled by another member of the Lay Ministry Team.
- 5.4 The Warden and/or LMTL will meet with the complainant and the LLM individually to discuss the issues.
- 5.5 If, in their judgement, they can facilitate resolution within the parish or benefice, the Warden and/or LMTL will hold a joint meeting with the LLM and their supervisor to seek ways of improving practice or relationships. In this meeting, the Warden and/or LMTL will support the LLM and their supervisor in creating a plan of action towards resolution, using the guidance in Appendix 1.
 - 5.5.1 If both the LLM and their supervisor agree to this plan of action, the matter is considered under review.
 - 5.5.2 The Warden and/or LMTL will write to the LLM and to their supervisor recording the plan of action, and the timeline for review (normally 6 months). They will notify the Archdeacon.
 - 5.5.3 During the review period, the Warden and LMTL will assume responsibility for checking with both parties that the agreed plan of action is being followed.
 - 5.5.4 During the review period, the complainant may write to the Warden and LMTL requesting that the situation be escalated to the grievance procedure, explaining the reasons for their request.
 - 5.5.5 After considering the appeal, the Warden and LMTL may refer the matter to the DMM to begin the **grievance procedure** (6).
 - 5.5.6 If the Warden and LMTL do not uphold the appeal, they should respond to the appeal in writing within 14 days. They should explain their decision and recommend that the LLM and their supervisor continue with the agreed plan of action for the duration of the remaining review period.
 - 5.5.7 If, after the review period, the Warden and LMTL are satisfied that the situation has sufficiently improved, they will consider the matter resolved. The Warden will make a record on the LLM file, setting out what took place, how it was improved, and whether any training was given. The Archdeacon will be informed.

- 5.5.8 If, after the review period, the situation has not sufficiently improved, the Warden and LMTL can refer the matter to the DMM in order to begin the **grievance procedure** (6).
- 5.5.9 If either the LLM or the complainant do not agree to the plan of action suggested in 5.5, the Warden and LMTL should refer the matter to the DMM to begin the **grievance procedure** (6).
- 5.6 If, having spoken with the LLM and the complainant (5.4), the Warden and LMTL judge that the situation is unlikely to be resolved under 5.5, they can escalate the matter and begin the **grievance procedure** (6).
- 5.7 If, at any stage in this process, the Warden and LMTL deem there to have been serious misconduct on the part of the LLM, they should refer the matter to the DMM. The DMM, in consultation with the Bishop, may decide to initiate the **disciplinary procedure**.
- 5.8 In rare cases, the Warden and LMTL may recommend to the DMM that the **disciplinary procedure** be initiated due to the LLM's conduct during the complaints procedure. This is appropriate in cases where they judge that the LLM is demonstrating significant and persistent unwillingness to engage with the complaints procedure and recommendations made as part of this process.
 - 5.8.1 In such cases, the DMM will decide whether to initiate the disciplinary procedure, or whether to continue with the complaints and grievance procedures.
- 5.9 If the complainant feels that their concerns are not being dealt with adequately by the Warden and LMTL, they may contact the DMM directly.
 - 5.9.1 After reviewing the issue, the DMM may choose to escalate the situation and initiate the **grievance procedure** (6). The DMM will inform the Warden, LMTL, and Archdeacon of their decision. The grievance procedure will continue from 6.2.
 - 5.9.2 If the DMM decides not to initiate the grievance procedure, they should write to the complainant to explain their decision within 14 days of the appeal.

6 The grievance procedure

- 6.1 In cases where the Warden and/or LMTL decide to initiate the grievance procedure as an escalation of the complaints procedure (5.5.4, 5.5.6, 5.5.7, 5.8), the Warden will write to the LLM and the complainant to inform them that the grievance procedure is being initiated, explaining the reasons for this escalation. The Warden will notify the Archdeacon.
 - 6.1.1 The Warden will notify the Sub-Warden that the grievance procedure is beginning. The Sub-Warden will provide pastoral support to the LLM throughout the process.

- 6.1.2 The Warden and LMTL will step back from the process, and hand over the grievance to the DMM. Where there is a conflict of interest, the Archdeacon will fulfil the role of the DMM.
- 6.2 In cases where the DMM has initiated the grievance procedure in the light of an external complaint (5.12.1), the DMM will write to the LLM and the complainant to inform them that the grievance procedure is being initiated, explaining the reasons for this escalation.
- 6.2.1 The DMM will notify the Sub-Warden, who will provide pastoral support to the LLM throughout the process.
- 6.3 The DMM will meet with the LLM and the complainant individually to discuss the situation. The DMM should advise both parties that they are entitled to be accompanied at meetings by a friend or colleague who may provide support. These meetings will usually take place within 28 days of the grievance procedure being initiated, unless there are any unavoidable or acceptable delays.
- 6.4 If the DMM deems that resolution within the LLM's local context is still possible, they will meet with the LLM and the complainant to create a plan of action, using the guidance listed in Appendix 1. The DMM may recommend certain disciplinary measures as part of this plan of action, as listed in Appendix 1.
- 6.4.1 Within 14 days of this meeting, the DMM will write to both the LLM and the complainant to record this recommendation, and to determine an appropriate review period (normally 6 months). They will notify the Warden, LMTL, Archdeacon, and the Bishop.
- 6.4.2 During the review period, the DMM will assume responsibility for checking with both parties that the agreed plan of action is being followed.
- 6.4.3 During the review period, either the supervisor or the LLM may write to the DMM to indicate that the action plan is not being followed, or not leading to improvement. After reviewing the situation, the DMM may recommend actions listed in 6.5 below, or may initiate the **disciplinary procedure**, in consultation with the Bishop (see 6.6). Alternatively, the DMM may recommend that the LLM and supervisor continue with the agreed plan of action until the end of the review period.
- 6.4.4 If, after the review period, the DMM deems that the situation has sufficiently improved, they will send a final report to the Warden, LMTL, Archdeacon, and the Bishop. A record will be placed on the LLM file, including the details of actions taken, training received, and any disciplinary measures recommended as part of the grievance procedure.
- 6.4.5 If, after the review period, the DMM deems that resolution has not been possible, they may consider options listed in 6.5, or may initiate the **disciplinary procedure**, in consultation with the Bishop (see 6.6).
- 6.5 If, after the conversations described in 6.3, the DMM deems that resolution between the complainant and LLM is not possible, they may recommend that the LLM be permanently transferred to another parish or benefice. This is not to be understood as a

disciplinary action, but rather a decision made for the mutual benefit of the LLM and the complainant.

- 6.5.1 The DMM will write to both parties to record what has been agreed, copying in the Warden, LMTL, Archdeacon, and Bishop. A record will be kept on the LLM file.
- 6.5.2 The DMM will consult the Lay Ministry Team and the Bishop to agree a new parish or benefice for the LLM. Any new placement will be discussed and agreed with the parish or benefice before it is offered to the LLM. The DMM will work with the LLM and their new supervisor to create a plan of action [Appendix 1] to facilitate a smooth transfer.
- 6.5.3 The DMM will review with the LLM and their new supervisor in 6 months.
- 6.5.4 During this review period, the LLM or their new supervisor may write to the DMM to report issues or problems with the new placement. If the DMM deems that the LLM is making insufficient improvement in their practice or conduct, or is demonstrating persistent unwillingness to engage with support offered as part of the grievance procedure, they may, in consultation with the Bishop, initiate the **disciplinary procedure**. The DMM may also recommend additional support to facilitate a smooth transition (see Appendix 1).
- 6.6 At any stage in this process, the DMM may deem it necessary (in consultation with the Bishop) to initiate the disciplinary procedure. This is appropriate in cases where:
 - i. The DMM deems there to have been serious misconduct on the part of the LLM.
 - ii. The DMM deems there to have been insufficient progress in the LLM's conduct and practice, despite support or disciplinary measures agreed upon during the complaints and/or grievance procedures.
 - iii. The DMM judges that the LLM is demonstrating persistent unwillingness to engage with recommendations made as part of the concerns, complaints, and grievance procedures.

7 Recording of action

- 7.1 Those involved in the concerns, complaints, and grievance procedures should keep a chronological record of action taken and correspondence received, using the form in Appendix 3.
- 7.2 Written records of actions under the complaints and grievance procedures will be retained by the Warden on behalf of the Diocesan Bishop and will be subject to the provision of the General Data Protection Regulations (including the access rights of data subjects).
 - 7.1.2 For more information, please consult the [Diocesan Data Privacy Notice](#).

8 Maintaining impartiality

- 8.1 Those involved with the process should respect proper boundaries of confidentiality and only share information with those who genuinely need to know. They should not enter discussions relating to these processes with the LLM or the complainant outside the framework of the meetings arranged by them in accordance with this procedure.

Appendix 1

Guidance for Creating a Plan of Action towards Resolution [LLMs]

1 A note about this guidance

- 1.1 At any stage in the Concerns, Complaints, Grievance, or Disciplinary procedures, it may be appropriate to create a Plan of Action.
- 1.2 A Plan of Action is designed to support the LLM in their formational development, with the aim of helping them to become more effective in their ministry.
- 1.3 A Plan of Action should be drawn up collaboratively and should be mutually agreed and regularly reviewed. Achievements (however small) should be celebrated, and Plans adapted (by mutual consent) appropriately.
- 1.4 A Plan should comprise small, clearly articulated steps that an LLM is expected to undertake. The steps should be specific, measurable, achievable, relevant to the concerns identified, and time bound.
- 1.5 It is our recommendation that any plan draws upon (and can even be structured around) the qualities framework that is used as the basis for selection (see Appendix 2). The LLM Code of Good Ministerial Practice should also be considered when creating an Action Plan.

2 Tools to support formation

- 2.1 Ongoing formation happens best when it is within a culture of encouragement and appropriate challenge, but which is also underpinned by love.
- 2.2 There are a number of tools that can be used to support the formational journey:
 - i. *Reflective learning*: This is a period of time where the LLM is invited to engage in some reflective learning where issues that have been identified can be explored in more detail from a range of different perspectives. It would also be possible to include some theological reflection as part of this learning. For further advice, please contact the Lay Development Officer: niamh.colbrook@elydiocese.org.
 - ii. *Further Training*: It may be that a need for further training has been identified. This should be a focussed and specific need. To access training, please contact the Lay Development Officer: niamh.colbrook@elydiocese.org.
 - iii. *Reflective Practice Supervision*: Reflective Practice enables an individual to explore aspects of ministry within a space that is held by a trained supervisor. To access

Reflective Practice Supervision, please contact the Diocesan Director of Ordinands: david.newton@elydiocese.org.

- iv. *Counselling:* There may be times in our lives when each of us needs to access the support of a trained counsellor. It is often the case that things in our past cause us to behave or react in certain ways. This confidential service is offered free of charge. To access the service, please contact the Bishop's Advisor for Clergy Counselling: clergy.counselling@elydiocese.org.
- v. *Spiritual Direction:* Spiritual Direction helps an individual deepen their relationship with God by journeying with a trained director. To access Spiritual Direction, please contact the Bishop's Advisor for Spiritual Direction: spiritual.direction@elydiocese.org.
- vi. *Formal mediation:* Formal mediation helps individuals to navigate conflict with the support of a trained, independent third party. To access mediation, please contact the Bishop's Advisor for Resilience in Conflict: resilience.advisor@elydiocese.org
- vii. *A temporary withdrawal from ministry:* Sometimes it is beneficial to all parties for the LLM to agree a temporary withdrawal from public ministry. This creates a space and time for deeper reflection to take place. The withdrawal should be time limited, and a focus should be provided. The Warden of LLMs should be notified if a temporary withdrawal from public ministry is being planned: cathy.watts@elydiocese.org.

3 Action plans and disciplinary measures

- 3.1 The aim of the concerns, complaints and grievance procedures is to bring resolution. Depending on the issue raised, along with the formational work undertaken within the agreed Action Plan, it may be considered necessary to impose a disciplinary measure as part of the resolution of the Complaints or Grievance procedures.
 - 3.1.2 Disciplinary measures are not to be used as part of the initial process to resolve a concern, but may only be used by the Warden, LMTL, and/or DMM as part of the complaints and grievance procedures.
- 3.2 The disciplinary measure should be agreed with the LLM and could include:
 - i. A verbal warning
 - ii. A written warning
 - iii. A request to step back from ministry for a limited period of time
- 3.3 It should be made clear when a temporary step back from ministry is being agreed as a disciplinary measure, rather than as a tool to support formation (2.2).

Plan of Action

Area of Concern	Work to be undertaken to address concern	Link to Discernment Qualities Framework	Additional Resources Identified	Timescale (inc. date for review)	Expected impact

Agreed disciplinary measures to be taken (if applicable)

Signed (LMM):

Signed:

Date:

Role: Supervisor/Warden/LMTL/DMM

Appendix 2

LLM Qualities Framework

	Christ	Church	World	Self
Love of God <i>The Candidate...</i>	Is reliant on God, and lives out an infectious, life-transforming, everyday-focused faith	Is rooted in Scripture, the worship of the Church and the living traditions of faith	Whole heartedly, generously, and attractively engages with God's world	Is prayerful and studies the Bible
Call to Ministry <i>The Candidate...</i>	Responds to the call of Christ to be a disciple	Understands and is excited by the nature of Reader/LLM (Reader) ministry	Is committed to public ministry rooted in God's world	Has a sense of call to lay ministry
Love for People <i>The Candidate...</i>	Welcomes Christ in others and follows Jesus' example in listening, valuing and respecting others	Builds healthy relationships which are enabling of others in ministry	Seeks to serve their community and enable others to join in mission	Has empathy and is self-aware
Wisdom <i>The Candidate...</i>	Is open to life-long learning, reflection and growth	Can work collaboratively and embrace difference	Can connect gathered worship with being sent out into the world	Is a person of integrity and emotional stability, open to feedback
Fruitfulness <i>The Candidate...</i>	Shares God's story in a way that encourages others to follow Jesus' call in their lives	Can share the faith imaginatively, relevantly and well	Shares God's love for the world in mission	Recognises their strengths and weaknesses, and resources themselves with good self-care
Potential <i>The Candidate...</i>	Grow in faith and to be open to navigating the future in the company of Christ	Lead collaboratively as part of a local team within the wider church context	See where God is working in the world and spot opportunities to respond	Be adaptable, imaginative, and creative
Trustworthiness <i>The Candidate...</i>	Follows Christ in every part of their life	Leads maturely in a way which promotes safe and harmonious Christian communities	Lives a life that publicly and positively represents their faith and the church	Has a high degree of self-awareness

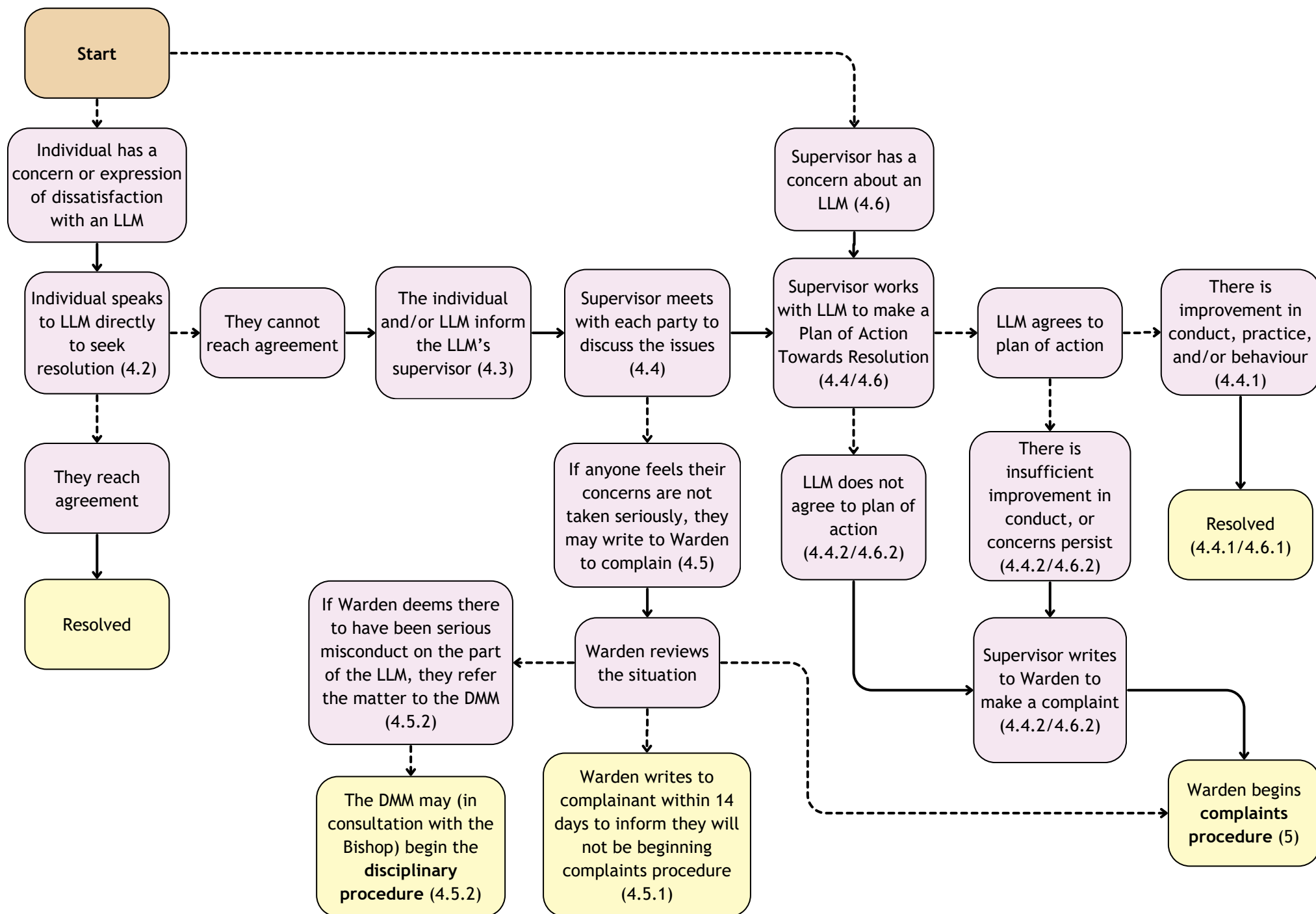
Appendix 3

Recording Actions and Correspondence

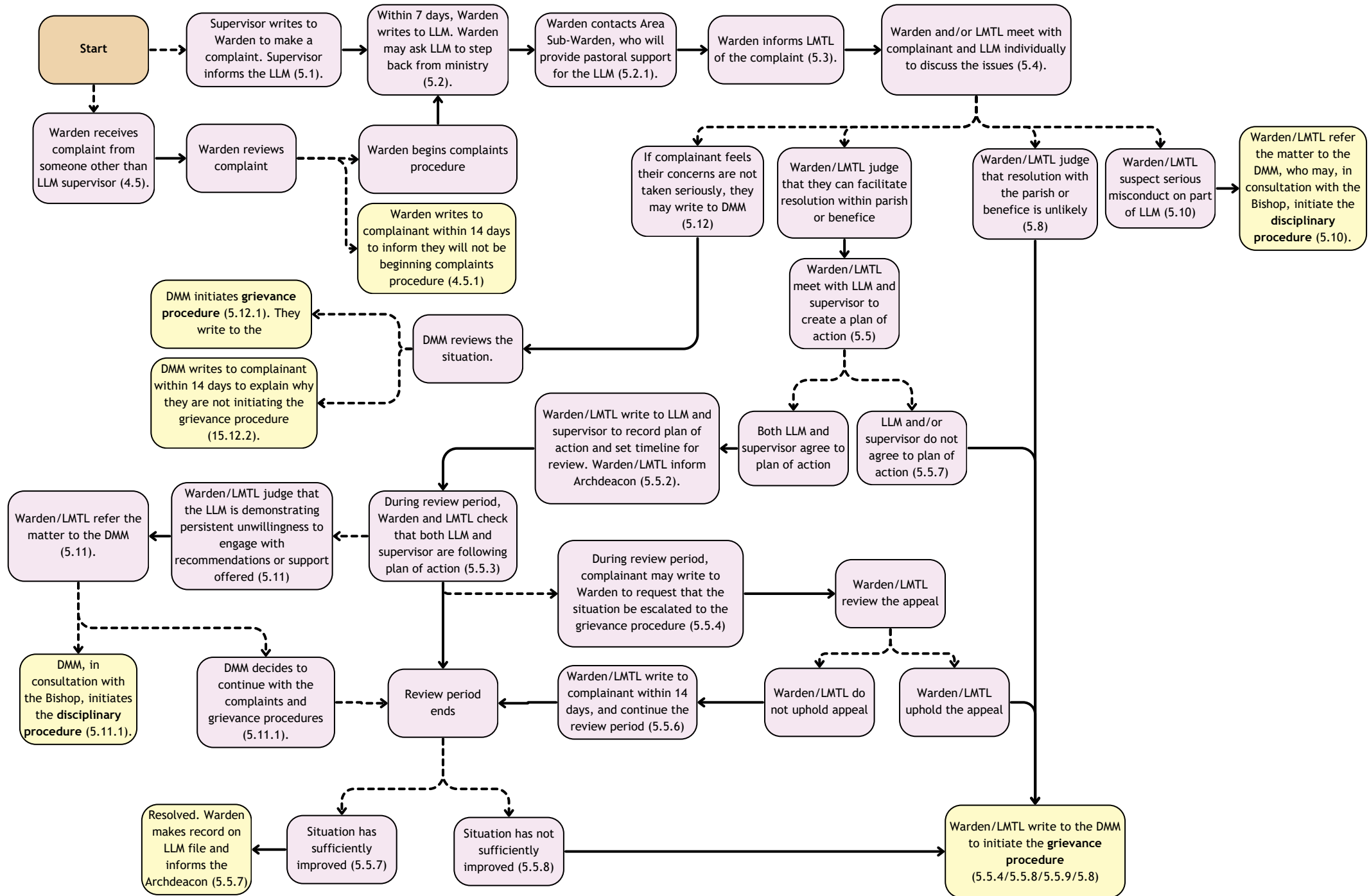
This form is to be used to keep a chronological record of actions and correspondence relevant to the concerns, complaints, and grievance procedures. Please ensure that you retain copies of relevant email correspondence for the duration of the procedures.

Date	Names of those involved	Action/Correspondence	Comment

Summary of the initial steps to resolve a concern



Summary of the Complaints Procedure



Summary of the Grievance Procedure

