

# Guidance for Making a Complaint about an FIEC Church

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## A. What is the purpose of this procedure?

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This procedure exists to deal with complaints that could, unaddressed, lead to the disaffiliation of a FIEC church.

### **Please note: FIEC churches are independent bodies**

It is essential to note that all FIEC churches are self-governing bodies over whom FIEC has no central oversight or control. Thus FIEC has no jurisdiction over their internal affairs and cannot compel any of its affiliated churches to enact changes, neither has it authority to overturn any of its decisions.

We can, however, give advice to a church in situations where a failure to take certain actions might threaten their good standing with the wider Fellowship. [\*We also offer to help churches with mediation.\*](#)

FIEC's only functional power over a church would be to disaffiliate it.

## B. What types of complaints are covered by this procedure?

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1. **An affiliated church departing from FIEC's Statement of Faith** (or a pattern of practice materially at odds with the agreed Ethos Statements of the Fellowship).
2. **An affiliated church failing to have in place proper Charitable governance** (inc. appropriate Safeguarding measures, proper financial probity, etc). Concerns in such areas should be addressed in the first instance to the Charity Trustees/Leadership. If unresolved then the next step would be to contact the Commission (OSCR in Scotland).
3. **An affiliated church failing to deal appropriately with allegations of abusive leadership practices** (see: notes on complaints relating to 'spiritually abusive leadership practices').
4. **An affiliated church failing to address leadership behaviour that falls below clear Biblical standards** (e.g. sexual impropriety, dishonesty, violence).

## C. What types of complaints are NOT covered by this procedure?

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1. **Safeguarding complaints relating to FIEC Trustees, staff, volunteers and others working on our behalf.** A separate FIEC Safeguarding Policy is in place for such complaints.
2. **Safeguarding incidents in a local church.** Any incidents or concerns regarding Safeguarding issues should be reported to the church's 'Safeguarding Lead' who should deal with them in line with the church's own Safeguarding Policies (as independently registered charities every local church should have these in place).
3. **Criminality.** Allegations of criminal activity (e.g. theft, fraud, assault), should be reported to the relevant authorities (e.g. the police).

4. **Disputes over secondary theological issues** (that do not conflict with or undermine FIEC's Statement of Faith and Ethos Statements).
5. **Disagreements about church polity or internal church business decisions** (e.g. constitutional issues employment, expenditure, vision, etc.).
6. **Complaints about an FIEC Pastors' Network member not attached to an affiliated FIEC church.** Such complaints should be referred to the church where the individual is a leader or member.
7. **More generally, complaints that have not been presented, in the first instance, to the leadership of the local church in question.**

## D. How should I take forward a complaint?

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### 1. In the local church

As noted in C.6, the normal Biblical pattern for raising a complaint is to do so directly with those causing offence. We want to encourage this 'Matthew 18' practice, as in the vast majority of cases personal engagement within the local congregation allows problems to be resolved quickly and without lasting recrimination or disruption.

Complaints pertaining to general governance issues should be directed to the local church leadership (e.g. elders and/or Trustees). Indeed, it is our advice that every local church has its own Complaints policy and procedure in place for dealing with such eventualities.

#### **Exceptions**

We recognise, however, that such direct approaches and remedies may not always be possible where:

- i. attempts to raise concerns and seek remedy within a congregation have been rebuffed or where previous complaints have resulted in negative consequences for the complainant;
- ii. a perceived conflict of interest or threatening imbalance of power means raising a complaint directly with church leaders is considered to be unsafe;
- iii. previously promised remedies have not materialised.

### 2. Statutory Agencies

As noted in C.2 and C.3, there are a number of issues that should be taken directly to statutory bodies such as the police or social services.

Additionally every church constituted as a charity is accountable to the Charity Commission (OSCR in Scotland). As such they will be subject to certain standards of governance in regards to finance, Trusteeship and other reporting requirements. Issues pertaining to such areas should be raised with the Trustees in the first instance.

If a church is willfully or recklessly failing to take actions to comply with its charitable obligations, it can be reported to the Charity Commission.

### 3. FIEC

#### Contacting FIEC

We would encourage anyone considering lodging a complaint to contact the FIEC office in the first instance, where we can arrange to discuss the situation with them. This can enable greater clarity and both sides and may allow for concerns to be raised in a less formal way. [We also offer to help churches with mediation.](#)

Complaints can be submitted to FIEC as a 'last resort' in those areas where failings are at risk of bringing a church or a Pastors' Network member into conflict with their Fellowship commitments and/or bringing the Gospel into disrepute.

Again, please note,

- i. that submitting a complaint to FIEC is not a substitute for taking a complaint to the local church (where that is possible) – nor is it a mechanism by which FIEC can force changes upon a church or pastor.
- ii. that FIEC is not an investigative agency and thus cannot adjudicate on the factuality of claims or counter-claims in disputed matters – our judgement can only be as to whether a church is dealing with, and responding to, complaints appropriately.

***For the formal lodging of a complaint, a form is available.***

Contact [\*\*admin@fiec.org.uk\*\*](mailto:admin@fiec.org.uk) or call **01858 43 45 40** to request this form.

Please read the notes in section F that are relevant to the type of complaint being made.

## E. How will my complaint be processed by FIEC?

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1. Once a formal written complaint has been received, we will acknowledge receipt of it within 7 days.
2. An initial assessment will be made – as to whether the complaint (if unaddressed) is of a nature that could potentially lead to disaffiliation.
3. If **no** – we will inform the complainant accordingly.
4. If **yes** – a member of the FIEC Staff Team will seek a response from the church / leader(s) involved. This will ask how the church or pastor has handled the complaint /situation, and any further actions they are planning to take. The FIEC Trustees will be informed of this process.
5. If the measures proposed by the church or pastor seem to be reasonable – we will advise the complainant accordingly.
6. If further action is recommended, we will advise the church.
7. If there is no co-operation from the church, or a refusal to take reasonable advice – a report will be submitted to the FIEC Trust Board who would have the final determination on the matter (i.e. whether disaffiliation is merited).

## F. Notes on the types of complaint covered by this policy

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1. **An affiliated church departing from FIEC's Statement of Faith** (or a pattern of practice materially at odds with the agreed Ethos Statements of the Fellowship).
  - FIEC's Statement of Faith and three Ethos Statements can be read at [fiec.org.uk/beliefs](http://fiec.org.uk/beliefs)
2. **An affiliated church failing to have in place proper Charitable governance** (inc. appropriate Safeguarding measures, proper financial probity, etc.).
  - The Charity Commission's governance requirements can be accessed at [gov.uk/government/organisations/charity-commission](http://gov.uk/government/organisations/charity-commission) (or [oscr.org.uk](http://oscr.org.uk) for Scotland).
3. **An affiliated church failing to deal appropriately with allegations of spiritually abusive leadership practices.**
  - Appendix 2 (FIEC Trust Board statement on Abuse & Pastoral Malpractice).
  - Appendix 1 (for complaints relating to 'spiritually abusive leadership practices').
4. **Leadership behaviour that falls below clear Biblical standards** (e.g. sexual impropriety, dishonesty, violence).
  - FIEC's Biblical Standards for those in Pastoral Ministry can be read on [the FIEC website](http://theFIECwebsite).

## APPENDIX 1: Notes on complaints relating to 'spiritually abusive leadership practices'

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The aim of this appendix is twofold: to protect the church by exposing those who are abusive, and to protect those falsely accused by raising awareness of how 'Spiritual Abuse' can be recognised.

### **Defining 'spiritually abusive leadership practices'**

'Spiritual Abuse' is the abuse of power in a religious setting. For example, using scripture, religious practices and biblical roles (e.g. headship and submission) wrongly, to remove power and personhood of one, for the personal benefit of another.

Submission to church leadership is biblical, but it is a choice. The person led is, ultimately, free to decide how to respond to the teaching/advice of their leader in any particular situation. Abuse is subjugation (oppression), with fear of repercussion. When a person is not free to make their own decisions, their obedience is driven by fear not faith.

Such behaviour from a leader may be public and prominent, but usually it is more subtle and cannot be reduced to a definitive list of qualities. That said, red flags include: noticeable patterns of coercion, domination and exploitation that result in the person losing their voice and their choice. Another common result of abusive leadership is a protective inner group that sees red flags but doesn't call them out in order to protect the abuser or institution. That is why it is imperative that when abuse is suspected there is remit to appeal for advice to the FIEC.

This type of abuse is not to be equated with occasional mistakes or moments of irritability, thoughtlessness or even strongly expressed disagreement. For example, the following are not automatically abusive:

- The upholding of a church's theological convictions (Titus 1:9, Jude 3-4).
- The exercise of legitimate leadership authority over the running of the church, for example eldership and Trustee decisions about the organisation of services, staffing, allocation of resources etc (Hebrews 13:17-19, 1 Pet 5:1-3).
- Biblical teaching that may be disagreeable to aspects of contemporary culture (1 Cor 6:9-11).
- Personality clashes, for example tensions arising from differing sensibilities or ways of working (Acts 15:36-41).
- Patiently rebuking sin matters of those in the flock (1 Thess 5:14).
- Mistakes, thoughtlessness, ill-judged remarks, etc. – that all can err in, but can be readily recognised and apologised for (James 5:16).

However, in all these areas the command to let your gentleness be evident to all (Phil 4:5), reminds us that it is the way that we lead that is of paramount importance. The Spirit-filled leader will be growing the fruit of the Spirit.

For helpful resources on the Fruit of the Spirit, please see our series called *Fruitful* on the FIEC website at [fiec.org.uk/fruitful](http://fiec.org.uk/fruitful).

## APPENDIX 2: FIEC Trust Board statement on Abuse & Pastoral Malpractice

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As a Fellowship, we recognise that abuse in all its forms is wrong before the Lord and deeply damaging to the victims. We are committed to supporting and developing godly leadership and pastoral care in our churches.

All teaching and leadership is to be conducted with grace and love. We seek to promote Biblical teaching and practice, so that believers grow to maturity in Christ. Church discipline is required in cases of unrepentant false teaching or sinful practice. The goal is not only the purity of the church but also the restoration of the sinner.

The Biblical pictures of spiritual leadership are those of a shepherd, devoted parent, and servant. The ultimate example is the Lord Jesus Christ.

FIEC is a voluntary association of independent churches united in our belief in the gospel. Whilst the churches of the Fellowship seek to help one another, in principle and in practice we respect the autonomy of the local church and exercise no direct central control.

Whilst FIEC is not responsible for safeguarding issues arising within its churches, we do expect all the churches of the Fellowship to have a safeguarding policy in place protecting children and vulnerable adults. Where there are allegations of illegal activity, we expect these to be reported to the statutory authorities.

If a **church** within FIEC has systematically failed to act in accordance with its own safeguarding policy and subsequently refuses to ensure appropriate action is taken internally, the church will, where appropriate, be requested by FIEC to deal with the matter carefully and urgently. Failure to do so is likely to result in the church being removed from FIEC by the Trust Board. Where necessary a report will be made to the statutory regulatory bodies.

**Church leaders**, and others in the local church involved in leadership and pastoral care, can behave in ways that, whilst not illegal, do fall short of the standards expected of a person with pastoral responsibility. These behaviours can range from spiritually abusive practices (e.g. involving coercion or exploitation) to simply being unwise in relating to others. Given the autonomy of the local church, we expect local churches to take the initiative in taking appropriate action to deal with such situations.

Where allegations of serious misconduct or spiritually abusive practices are not appropriately dealt with by the local church, a pastor may be removed from the Pastors' Network, or the church from the FIEC. Where appropriate, FIEC will report to statutory bodies.

FIEC encourages churches to make available appropriate pastoral care for all those affected and/or involved in such situations.

## APPENDIX 3: Notes on Trauma awareness for churches

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This appendix is relevant to these policies as it is pertinent to the recognition of, and harm caused by, spiritually abusive leadership.

To lead churches well, it is helpful to be aware that there are likely to be trauma survivors in our congregations. Trauma, in this instance, is not the harmful event itself; it describes the impact harmful events have on an individual, wounding the memory and central nervous system.

Survivors of trauma may experience a deep fear of not being believed, mistrust of others, confusion, isolation, shame and a fear of being misunderstood and therefore further harmed by others (re-traumatised). Sadly, re-traumatisation occurs frequently and, pertinent to this discussion, may result in a survivor finding typical church ministries triggering – even under healthy leadership. This can result in allegations of abuse where the leadership has been well-intentioned, just not sensitive to the hidden wounds of a trauma survivor.

When church leaders are aware that people may carry unseen trauma wounds, they are less likely to harm and more likely to help in the way God intended. Trauma therapy is a specialist area, and it is advisable to seek professional help to alleviate suffering. One of the most significant factors in trauma recovery is the presence of a supportive, patient, loving, trusted community which listens. Such a community takes things very slowly and, along with the trauma survivor, mutually collaborates to make reasonable adjustments wherever possible to mitigate the risk of further harm. Such an approach models the humility, gentle and loving compassion of our Saviour. It is imperative that the survivor be treated with dignity, respect, patience and always feel they have the right and freedom to make their own decision without fear of retribution so as to rebuild their personhood.

For further resources, please see the following on the FIEC website:

### ***Understanding Spiritual Abuse***

An article written by Catherine Haddow

[fiec.org.uk/assets/downloadables/Understanding-Spiritual-Abuse.pdf](https://fiec.org.uk/assets/downloadables/Understanding-Spiritual-Abuse.pdf)

### ***What is Trauma?***

An article written by Catherine Haddow

[fiec.org.uk/assets/downloadables/What-is-Trauma.pdf](https://fiec.org.uk/assets/downloadables/What-is-Trauma.pdf)

### ***Christ, Trauma, Abuse, and the Church***

A talk given by Phil Swann at the 2022 FIEC Leaders' Conference

[fiec.org.uk/resources/christ-trauma-abuse-and-the-church](https://fiec.org.uk/resources/christ-trauma-abuse-and-the-church)