

Guidance for raising a concern about an FIEC church

Contents

A. What is the purpose of this procedure?	2
B. What types of concerns are covered by this procedure?	3
C. What types of concerns are <u>not</u> covered by this procedure?	3
D. How should a concern be handled?	4
E. How might my concerns be taken forward by FIEC?	5
Appendix 1: FIEC Trust Board statement on Abuse & Pastoral Malpractice	6
Appendix 2: Notes on complaints relating to 'spiritually abusive leadership practices'	7

A. What is the purpose of this procedure?

Summary

To help ensure that local churches respond to concerns raised about them in fair and reasonable ways.

Problems in church life

In the course of church life, it's inevitable there will be occasions when problems arise.

Such difficulties can come in a variety of forms – e.g. relational, procedural or doctrinal. Sometimes these are just the result of misunderstandings, but we understand that poor practices and indeed sinful behaviour can also be involved.

Where these issues arise, the right place for them to be addressed and resolved is in the church itself.

The autonomy of local churches

It is important that the independency of FIEC churches is understood, as this will help avoid confusion about FIEC's powers and role when concerns are raised about an affiliated church.

FIEC churches are self-governing bodies (i.e. registered charities in their own right). Membership of FIEC is on a voluntary basis and, as such, FIEC has no central oversight or control over affiliated churches.

This means FIEC has no jurisdiction over a church's internal affairs and cannot compel any of its affiliated churches to enact changes, neither has it authority to overturn any of its decisions.

FIEC's role & remit

FIEC is not a Governing Denomination or Investigative Agency. This means we cannot adjudicate on historic and disputed incidents.

However, where there are serious concerns that a local church has not addressed matters raised with them appropriately, FIEC can play a part in seeking clarifications as to how a church has handled such concerns.

Our role is to advise a church in situations where failure to take certain actions might threaten their good standing with the wider Fellowship.

Functionally, our only power over an FIEC church would be to disaffiliate it, but that would be an extreme last resort reserved for churches who were egregiously refusing to engage with this procedure.

Wider FIEC help

While this procedure is necessarily narrow in its focus, FIEC's wider concern is to help and support churches so that problems in churches can be dealt with without the need for such escalation. We have a team of local directors and ministry staff who are always glad to be contacted for advice and support on any issue and can help with informal advice and support.

B. What types of concerns are covered by this procedure?

1. **An affiliated church departing from FIEC's Doctrinal Basis** (or a pattern of practice materially at odds with the agreed Ethos Statements of the Fellowship).^a
2. **An affiliated church failing to have in place proper Charitable governance** (incl. appropriate Safeguarding measures, proper financial probity, etc.).^b
3. **An affiliated church failing to deal appropriately with allegations of damaging leadership practices** (see: notes on complaints relating to 'spiritually abusive leadership practices').^c
4. **An affiliated church failing to address leadership behaviour that falls below clear Biblical standards** (e.g. sexual impropriety, dishonesty).^d

C. What types of concerns are not covered by this procedure?

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. **Statutory Safeguarding incidents in a local church** (i.e. relating to children or vulnerable adults). Any such 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. **Employment Disputes.** Matters relating to an employment grievance should be addressed by the local church as the employer.
5. **Disputes over secondary theological issues** (that do not conflict with or undermine FIEC's Doctrinal Basis and Ethos Statements).
6. **Disagreements about church polity or internal church business decisions** (e.g. constitutional issues, employment, expenditure, vision, etc.).
7. **Concerns about an FIEC Pastors' Network member not attached to an affiliated FIEC church.** Such complaints should be referred to the church body where the individual is a leader or member.
8. More generally, **concerns that have not been presented, in the first instance, to the leadership of the local church in question.**

a. FIEC's Statement of Faith and three Ethos Statements can be read at fiec.org.uk/beliefs

b. The Charity Commission's governance requirements can be accessed at gov.uk/government/organisations/charity-commission (or oscr.org.uk for Scotland).

c. See Appendix 2 (FIEC Trust Board statement on Abuse & Pastoral Malpractice).

d. FIEC's *Biblical Standards for those in Pastoral Ministry* can be read on the FIEC website at fiec.org.uk/who-we-are/what-we-do/ministry-networks/biblical-standards-for-those-in-pastoral-ministry

D. How should a concern be handled?

There are several possible avenues for dealing with concerns.

It is important to note that in cases of criminality, the relevant statutory agencies should be contacted directly.

1. In the local church

In cases where sin or offending behaviour has disrupted relationships, the normal Biblical pattern for raising a concern is to do so directly with those causing the 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.

For wider church issues, i.e. where such personal engagement is not appropriate, concerns should be directed to the local church leadership, i.e. elders and/or Trustees (e.g. 1 Timothy 5:19-22). Indeed, it is our advice that every local church has its own policies and procedures in place for dealing with such eventualities.

Exceptions

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

- a. 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;
- b. a perceived conflict of interest or threatening imbalance of power means raising a complaint directly with church leaders is considered to be unsafe;
- c. previously promised remedies have not materialised.

2. Statutory Agencies

As noted in C.2 and C.3, there are certain issues (e.g. criminality) 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, e.g. finance, Trusteeship and other reporting requirements. Issues pertaining to such areas should be raised with the local church Trustees in the first instance.

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

Similarly, employment grievance procedures should be taken forward with appropriate legal and/or arbitration services (e.g. solicitor, ACAS, Employment Tribunal).

3. FIEC

Contacting FIEC and arranging a call

If, having considered and worked through the appropriate options above, you would like to discuss your concerns with us, the FIEC office can be contacted and a call arranged.

This will help us to clarify the nature of the concern, advise on potential avenues for help and the most appropriate next steps.

To arrange a call please contact admin@fiec.org.uk or call **01858 43 45 40**.

If you email to request a call, only a very short summary of your concern should be included.

E. How might my concerns be taken forward by FIEC?

1. When concerns are raised, FIEC will seek to help the parties resolve them in the most appropriate ways. Thus, it may be that with some third-party guidance and/or help that concerns can be resolved without the need for a more formal process.

If, however, such resolution is not achievable because a party believes that the church has not had adequate complaints handling processes in place, then a formal complaint can be submitted to FIEC.

2. If a formal complaint is raised, a Complaint Report (containing summary notes of the background to the complaint and the alleged failings of the church) will be drafted by FIEC (this information will be gathered by FIEC staff). The complainant will be asked to check this 'Complaint Report' before submission to the church.

Please note, when formal complaints are raised both the church and the FIEC Trust Board will be notified.

3. A response to the Complaint Report will then be sought 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.
4. We will then report back to the complainant the church's response and what further steps, if any, might be possible and/or appropriate.
5. 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 will have the final determination on the matter (i.e. whether disaffiliation is merited).

Again, please note:

- a. that submitting a concern to FIEC is not a substitute for taking a concern to the local church (where that is possible) – nor is it a mechanism by which FIEC can force changes upon a church or pastor.
- b. 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.

APPENDIX 1: FIEC Trust Board statement on Abuse & Pastoral Malpractice

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 2: Notes on complaints relating to ‘spiritually abusive leadership practices’

This section outlines the definition FIEC will apply in its handling of complaints regarding spiritual abuse.

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