DIVINE RETREAT CENTRE UK

GRIEVANCE POLICY & PROCEDURE

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Next Review: 2027
Applies To: Employees, volunteers, ministry workers and others serving in an equivalent capacity within Divine Retreat Centre UK

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1. POLICY STATEMENT

Divine Retreat Centre UK ("DRC UK") is committed to providing an environment in which employees, volunteers, clergy, religious, ministry workers and others serving within its activities are treated with dignity, fairness, charity and respect.

DRC UK recognises that concerns or disagreements may arise from time to time. Individuals must be able to raise genuine grievances without fear of retaliation, victimisation, intimidation or unfair treatment.

Grievances will be handled fairly, sensitively, confidentially as far as reasonably possible, and without unnecessary delay.

As a Catholic organisation, DRC UK seeks to encourage reconciliation, respectful dialogue and Christian charity. However, pastoral or spiritual approaches must **never replace appropriate formal procedures**, particularly where a concern involves safeguarding, discrimination, harassment, abuse, serious misconduct or potential criminal behaviour.

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2. PURPOSE

The purpose of this policy is to:

- provide a clear process for raising workplace or volunteering grievances;
- ensure grievances are considered consistently, fairly and objectively;
- encourage appropriate early resolution where possible;
- protect individuals from victimisation for raising concerns in good faith;
- ensure appropriate records are maintained;
- distinguish grievances from safeguarding concerns, complaints, whistleblowing and disciplinary matters;
- ensure serious matters are referred to the appropriate safeguarding, regulatory, statutory or law-enforcement authorities where necessary.

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3. SCOPE

This policy applies, as appropriate, to:

- employees;
- volunteers;
- ministry volunteers and team leaders;
- members of staff;
- clergy and religious serving within DRC UK, subject also to applicable canonical, diocesan, congregational or religious institute procedures;
- interns, placements and similar workers;
- individuals undertaking authorised ministry or service on behalf of DRC UK.

Where an individual is not an employee, certain employment-law procedures or rights may not apply. Nevertheless, DRC UK will seek to apply the principles of fairness, dignity, appropriate investigation and reasonable opportunity to be heard.

Concerns raised by retreatants, pilgrims, visitors, attendees or members of the public should normally be managed under the **Complaints Policy**, unless the matter is more appropriately dealt with under safeguarding, whistleblowing or another procedure.

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4. GUIDING PRINCIPLES

DRC UK will seek to ensure that:

1. grievances are taken seriously;
2. concerns are addressed promptly;
3. all parties are treated with dignity and respect;
4. decisions are based on available evidence and not assumptions;
5. conflicts of interest are identified and appropriately managed;
6. confidentiality is maintained on a need-to-know basis;
7. individuals are protected from retaliation for raising genuine concerns in good faith;
8. the person raising the grievance has a reasonable opportunity to explain their concerns;
9. any person whose conduct is materially criticised is given an appropriate opportunity to respond;
10. safeguarding concerns are immediately transferred to safeguarding procedures;
11. records are appropriately maintained;
12. appropriate appeal or review arrangements are available.

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5. WHAT IS A GRIEVANCE?

A grievance is a concern, problem or complaint that an individual wishes to raise regarding their work, volunteering, ministry environment or treatment within DRC UK.

Examples may include:

- treatment by another employee, volunteer or ministry leader;
- unreasonable management decisions;
- breakdowns in working relationships;
- bullying;
- harassment;
- discrimination;
- inappropriate behaviour;
- unfair allocation of duties;
- working or volunteering conditions;
- health and safety concerns relating to the person’s role;
- communication difficulties;
- concerns regarding implementation of organisational policies;
- perceived unfairness in decision-making;
- interpersonal conflict.

This list is illustrative and not exhaustive.

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6. MATTERS THAT REQUIRE A DIFFERENT PROCEDURE

A concern should not automatically be treated as an ordinary grievance simply because the person raising it describes it as one.

6.1 Safeguarding concerns

Any allegation or concern involving:

- abuse or suspected abuse of a child;
- abuse or neglect of an adult at risk;
- sexual misconduct or exploitation;
- grooming;
- spiritual or pastoral abuse where safeguarding issues arise;
- boundary violations presenting safeguarding risk;
- conduct indicating that a person may pose a risk to children or adults at risk;

must be referred promptly to the **Safeguarding Lead** and managed under DRC UK's safeguarding procedures.

A safeguarding concern must not be delayed while an internal grievance procedure is completed.

Where appropriate, referral may also be required to statutory authorities or other relevant safeguarding bodies.

6.2 Whistleblowing

Concerns regarding serious wrongdoing in the public interest — for example fraud, serious regulatory breaches, concealment of wrongdoing, serious health and safety failures or systemic safeguarding failures — may fall under the **Whistleblowing Policy**.

6.3 Disciplinary matters

Where information arising from a grievance indicates potential misconduct by another person, DRC UK may initiate a separate disciplinary or conduct procedure.

6.4 Complaints from retreatants or members of the public

Service-related concerns from retreatants, attendees, visitors or members of the public should ordinarily be considered under the DRC UK **Complaints Policy**.

6.5 Criminal conduct or immediate danger

Where there is reason to believe that a criminal offence may have occurred or someone is at immediate risk of serious harm, DRC UK will consider referral to the appropriate statutory authorities without waiting for the conclusion of the grievance process.

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7. INFORMAL RESOLUTION

Where appropriate and safe, individuals are encouraged initially to attempt informal resolution.

This may involve:

- speaking respectfully with the person concerned;
- discussing the matter with a team leader or manager;
- requesting an informal facilitated conversation;
- seeking management assistance in resolving a misunderstanding.

Informal resolution is **not mandatory** where the person raising the concern does not feel safe or comfortable doing so, or where the matter is serious.

Informal mediation should not ordinarily be used as a substitute for investigation where allegations involve safeguarding, abuse, serious harassment, discrimination, intimidation or serious misconduct.

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8. FORMAL GRIEVANCE

Where informal resolution is inappropriate or has not resolved the matter, a formal grievance should normally be submitted in writing.

The grievance should, where possible, include:

- the nature of the grievance;
- relevant dates and locations;
- the people involved;
- relevant witnesses;
- any supporting information or documents;
- any steps already taken to resolve the matter;
- the outcome or resolution sought.

A person should not be prevented from raising a genuine concern merely because they have difficulty putting it in writing. Appropriate assistance should be offered where required.

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9. WHO SHOULD RECEIVE A GRIEVANCE?

A grievance should normally be submitted to the person's immediate manager, ministry leader or designated responsible person.

Where the grievance concerns that person, it should be submitted to the next appropriate level of leadership.

Where the grievance concerns:

- the Centre Director;
- a senior member of leadership;
- a member of clergy;
- the Safeguarding Lead; or
- another person whose involvement could create a conflict of interest,

the matter must be escalated to an appropriate independent or senior person who is not implicated in the concern.

DRC UK should not permit a person who is the subject of a grievance to control the investigation or determine its outcome.

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10. ACKNOWLEDGEMENT AND INITIAL ASSESSMENT

Formal grievances should be acknowledged promptly.

An initial assessment should determine:

- whether the matter falls within this policy;
- whether safeguarding procedures are required;
- whether whistleblowing procedures apply;

- whether there is an immediate health, safety or welfare risk;
- whether interim protective measures are required;
- whether there is a conflict of interest;
- who should investigate the matter;
- whether external advice or referral is necessary.

Where a concern engages more than one procedure, DRC UK will determine the safest and fairest way of coordinating those procedures.

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11. GRIEVANCE MEETING

The person raising the grievance will normally be invited to a meeting to explain their concerns.

They should be given reasonable notice of the meeting and information about the process.

Employees have applicable statutory rights regarding accompaniment at qualifying grievance meetings. DRC UK may also, where appropriate, permit volunteers or others to be accompanied by a suitable support person, subject to confidentiality and the orderly conduct of the process.

The meeting should provide an opportunity to:

- explain the grievance fully;
- clarify relevant facts;
- identify supporting evidence;
- identify relevant witnesses;
- discuss the resolution being sought.

Accurate notes should be maintained.

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12. INVESTIGATION

Where necessary, an impartial investigation will be undertaken.

The investigation may include:

- interviewing the person raising the grievance;
- interviewing the person complained about;
- interviewing witnesses;
- reviewing emails, messages, records or other relevant documentation;

- reviewing applicable policies and procedures;
- obtaining specialist or external advice where appropriate.

The investigator should approach the matter objectively and should not have a material conflict of interest.

The scope and extent of investigation will depend upon the seriousness and complexity of the matter.

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13. STANDARD OF DECISION-MAKING

Internal grievance decisions will normally be made on the **balance of probabilities** based upon the information reasonably available.

A grievance outcome is an internal organisational decision and does not determine criminal guilt or civil liability.

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14. OUTCOME

Following appropriate consideration, the person raising the grievance will normally receive a written outcome.

The outcome may state that the grievance is:

- upheld;
- partially upheld; or
- not upheld.

Where appropriate, the outcome may also identify organisational actions or recommendations.

Possible actions may include:

- facilitated discussion or mediation;
- clarification of roles or responsibilities;
- management action;
- additional supervision;
- training;
- amendment of working or volunteering arrangements;
- review of policies or procedures;

- safeguarding measures;
- initiation of a separate disciplinary process;
- referral to another appropriate process.

DRC UK may be unable to disclose confidential details concerning disciplinary action or personal information relating to another individual.

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15. APPEAL

Where the individual believes that:

- the procedure was materially unfair;
- relevant evidence was not reasonably considered;
- the decision was unreasonable based on the available evidence; or
- significant new evidence has become available,

they may submit an appeal.

An appeal should normally be made in writing within a reasonable period specified in the outcome letter, ordinarily **within 10 working days**.

The appeal should explain the grounds relied upon.

Where reasonably possible, the appeal should be considered by a person who:

- was not responsible for the original decision;
- is appropriately senior or independent; and
- has no material conflict of interest.

The appeal decision will normally conclude DRC UK's internal grievance process.

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16. CONFIDENTIALITY

Grievance information will be shared only with individuals who reasonably need the information to manage, investigate, advise upon or determine the matter.

Absolute confidentiality cannot be guaranteed.

Information may need to be disclosed where:

- safeguarding responsibilities require disclosure;
- there is a legal or regulatory obligation;
- statutory authorities require information;
- disclosure is necessary for a fair investigation;
- there is a serious risk to another person.

Participants should respect the confidentiality and dignity of everyone involved.

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17. NON-RETALIATION AND VICTIMISATION

No person should be subjected to retaliation, intimidation, hostility, disadvantage or victimisation because they have:

- raised a genuine grievance;
- provided information during an investigation;
- acted as a witness;
- supported another person appropriately in using this procedure.

Any alleged retaliation should be reported promptly and may itself result in safeguarding, disciplinary or other organisational action.

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18. MALICIOUS OR KNOWINGLY FALSE ALLEGATIONS

A grievance will **not** be treated as malicious merely because it is not upheld or because evidence is insufficient to substantiate it.

However, where there is clear evidence that an individual has deliberately fabricated allegations or knowingly provided materially false information with malicious intent, the matter may be addressed under an appropriate disciplinary or conduct procedure.

This provision must never be used to discourage individuals from raising genuine concerns.

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19. ANONYMOUS GRIEVANCES

DRC UK will consider anonymous concerns where sufficient information is available.

However, anonymity may restrict the organisation's ability to:

- clarify allegations;
- obtain additional evidence;
- provide procedural fairness;
- communicate an outcome.

Serious safeguarding, safety, criminal or regulatory concerns will be considered irrespective of whether the person raising them identifies themselves.

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20. INTERIM PROTECTIVE MEASURES

Where necessary during an investigation, DRC UK may implement proportionate interim measures.

These may include:

- changes to duties;
- changes to supervision;
- temporary separation of individuals;
- restrictions on particular activities;
- safeguarding plans;
- temporary suspension from particular duties or ministry where justified.

Such measures are precautionary and **must not automatically be treated as a finding of wrongdoing**.

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21. PASTORAL AND SPIRITUAL CONSIDERATIONS

DRC UK recognises the importance of prayer, reconciliation, forgiveness and pastoral support within Catholic ministry.

However:

- nobody should be pressured to reconcile personally with someone against whom they have raised a serious concern;
- forgiveness must not be presented as requiring a person to withdraw a grievance;
- prayer must not replace investigation or safeguarding action;
- spiritual authority must not be used to discourage reporting;
- confidentiality must not be confused with secrecy where safeguarding or legal reporting obligations exist;
- pastoral care should be available, where appropriate, to affected parties without compromising the independence of an investigation.

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22. SAFEGUARDING OVERRIDE

Safeguarding takes precedence where a grievance contains information indicating possible abuse, exploitation, neglect or risk of harm.

Any person receiving such information must promptly follow DRC UK's safeguarding reporting procedure.

The recipient should not attempt to investigate a safeguarding allegation independently unless authorised to do so within the applicable safeguarding process.

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23. DATA PROTECTION AND RECORD KEEPING

Records relating to grievances will be:

- accurate and factual;
- securely stored;
- accessible only to authorised persons;
- retained in accordance with DRC UK's retention arrangements and applicable data protection requirements;
- separated from general records where appropriate due to their sensitivity.

Records may include:

- the original grievance;
- acknowledgement;
- meeting notes;
- investigation records;
- evidence considered;
- correspondence;
- decisions;
- appeal documentation;
- actions arising.

Safeguarding records must be retained and managed in accordance with the applicable safeguarding record-management requirements.

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24. MONITORING AND GOVERNANCE

DRC UK leadership should periodically review grievance information in an appropriately anonymised or restricted form to identify:

- recurring concerns;
- cultural or management issues;
- patterns of bullying, harassment or inappropriate behaviour;
- safeguarding themes;
- training requirements;
- policy weaknesses;
- opportunities for organisational improvement.

Serious or recurring concerns should be appropriately escalated within DRC UK's governance structure.

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25. RELATED POLICIES AND PROCEDURES

This policy should be read alongside the relevant DRC UK:

- Safeguarding Policy;
- Safeguarding Incident, Concern & Allegation Management Procedure;
- Code of Conduct;

- Volunteer Policy;
- Volunteer Handbook;
- Whistleblowing Policy;
- Complaints Policy;
- Equality, Diversity & Inclusion Policy;
- Bullying & Harassment Policy;
- Disciplinary / Conduct Procedure;
- Health & Safety Policy;
- Data Protection and Confidentiality Policy;
- Pastoral, Spiritual & Ministry Safeguarding Framework;
- Adult Safeguarding Framework;
- Child and Young People Safeguarding Framework.

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26. RESPONSIBILITIES

DRC UK Leadership

Leadership is responsible for ensuring:

- this policy is implemented consistently;
- appropriate persons are appointed to consider grievances;
- conflicts of interest are appropriately managed;
- serious concerns are escalated;
- learning arising from grievances is acted upon.

Managers and Ministry Leaders

Managers and leaders must:

- listen respectfully to concerns;
- avoid dismissing or minimising grievances;
- maintain appropriate confidentiality;
- recognise safeguarding concerns;
- promptly escalate matters where necessary;
- avoid retaliation or unfair treatment.

Employees and Volunteers

Individuals are expected to:

- treat others with dignity and respect;

- raise genuine concerns responsibly;
- cooperate reasonably with investigations;
- maintain appropriate confidentiality;
- provide truthful information;
- avoid retaliation against anyone participating in a grievance process.

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27. PROCEDURAL FLOW

Concern arises

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Can it safely and appropriately be resolved informally?

YES → Informal discussion / facilitated resolution → Record agreed action where appropriate → Review outcome

NO / Unresolved → Formal written grievance

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Initial Assessment

Determine whether the matter involves:

Safeguarding → Refer immediately to Safeguarding Lead / safeguarding procedure

Whistleblowing → Refer to Whistleblowing Procedure

Potential criminal matter / immediate danger → Consider statutory referral / emergency action

Ordinary grievance → Continue under Grievance Procedure

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Acknowledge grievance

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Appoint impartial person / investigator

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Grievance meeting

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Investigation and evidence gathering

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Decision

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Written outcome

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Actions / organisational learning

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Appeal, where requested

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Final internal outcome and secure record retention

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28. POLICY REVIEW

This policy will be reviewed at least annually and earlier where necessary because of:

- legislative or regulatory change;
- safeguarding guidance;
- organisational restructuring;
- learning from a serious incident;

- grievance trends;
- audit findings;
- changes to DRC UK's ministry or residential operations.

APPROVAL & DOCUMENT CONTROL

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Organisation: Divine Retreat Centre UK
Version: 1.0
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Policy Owner: _____
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Next Review Date: _____

Signed: _____

Name / Position: _____

Date: _____