

# City on a Hill Evangelical Church

## Complaints Policy Quick Reference Guide

Approved April 2026  
Next review: April 2028

### Quick Reference Guide

#### Introduction

At City on a Hill, we care deeply about how we treat one another. If something goes wrong or you feel hurt, we want to listen and respond well. This process helps ensure complaints are taken seriously, addressed fairly, and used to improve our ministries.

#### Complaint Pathway Summary

- 1. Raise it informally first** – If appropriate, talk directly to the person involved.
- 2. Make a formal complaint if:**

- The issue is serious,
- Informal conversation wasn't possible or didn't resolve it.

#### Who to Contact

Complaint About	Who Handles It
Ministry Leader / Volunteer	Senior Pastor or Ministry Leader
Senior Pastor	Administration Team member (plus independent investigator if needed)
Trustee / Administration Team member	Senior Pastor + Board of Reference
Involving a child or vulnerable person	Safe Ministry Contact

#### Key Principles

- You will not be penalised for making a complaint in good faith (see *Protected Disclosures (Protection of Whistleblowers) Act 2022*).
- You will receive a response within **5 working days**.
- Most complaints will be resolved within **30 days**. Updates are provided every **10 working days**.
- Anonymous complaints may be considered, although the ability to investigate may be limited.
- Criminal matters will be reported to the police immediately.
- Pastoral care is offered throughout.
- All complaints are recorded confidentially and reviewed annually for learning.
- Concerns about staff behaviour may include potential breaches of the City on a Hill *Staff Code of Conduct*.

# City on a Hill Evangelical Church Complaints Resolution Policy

Approved April 2026

## 1. Purpose and Scope

City on a Hill Evangelical Church is committed to the fair, timely, and transparent handling of complaints.

This policy applies to incidents arising from church ministries, events, leadership, staff, volunteers, and activities conducted under the oversight of City on a Hill Evangelical Church. This policy also provides the process for addressing concerns that a staff member may have breached the City on a Hill *Staff Code of Conduct*.

The purpose of this policy is to:

- Support people in raising concerns safely and respectfully;
- Ensure complaints are handled in a way that is fair to all parties;
- Encourage continuous improvement of our ministries and culture.

## 2. Key Roles

- **Ministry Leaders** – paid staff or high-level volunteers (e.g., pastors, community group leaders, team leaders) who oversee ministries.
- **Senior Pastor** – has overall spiritual and operational leadership of the church.
- **Administration Team** – appointed primarily by the congregation and senior pastor, this team oversees property, finance, policy, and governance functions.
- **Trustees** – the legal office bearers of the church who execute contracts and financial decisions in line with Administration Team directions.
- **Safe Ministry Contact** – the person responsible for ensuring the appropriate application of our Child Safety Policy.
- **Board of Reference** – a small oversight body of respected Christian leaders (two external to the congregation, one internal) who provide independent oversight in complex or serious matters.

## 3. Definitions

- **Complaint** – an expression of dissatisfaction regarding the conduct of a representative of the church or a church activity.

- **Informal complaint** – a verbal or brief written concern aimed at quick resolution.
- **Formal complaint** – a written complaint submitted via form, letter, or email.
- **Simple complaint** – easily resolved, often through conversation or minor adjustments.
- **Serious complaint** – includes alleged misconduct, breaches of confidentiality, discrimination, harassment, or matters potentially making a staff member unfit for ministry.
- **Complex complaint** – requires formal investigation due to multiple issues, unclear facts, or significant relational impact.
- **Code of Conduct Breach** – a complaint that a staff member or leader has acted in a way that is inconsistent with the expectations outlined in the *City on a Hill Staff Code of Conduct*.
- **Not covered as a complaint** – theological disagreements, ministry philosophy, or church vision are best addressed through pastoral conversations, or teaching forums rather than through this complaints process. Pastors are available to meet personally to discuss these matters.

## 4. Policy Commitments

- Everyone has the right to raise concerns about behaviour, decisions, or ministry activities without fear of disadvantage.
- Complaints will be handled promptly, fairly, and confidentially, respecting both complainant and respondent.
- Anonymous complaints will be considered based on their seriousness and credibility, although our ability to investigate may be limited.
- Retaliation against any person making a complaint in good faith will not be tolerated.
  - This protection is provided under the *Protected Disclosures (Protection of Whistleblowers) Act 2022*.
- Allegations of retaliation will be treated as a separate complaint and escalated immediately to the Senior Pastor or Administration Team (if involving the Senior Pastor).
- Where serious misconduct is alleged, the person concerned may be stood down, placed on leave, or temporarily relieved of ministry duties while the matter is investigated. This action is not a presumption of guilt but a step to ensure safety and integrity during investigation.
- Criminal matters will be reported to the police immediately.

- Pastoral care and support will be offered to all parties, recognising that complaints can be stressful for everyone. This may include prayer, access to support people, and pastoral check-ins.
- All parties may have a support person or advocate present in any meetings relating to their complaint. This could be a trusted friend, church member, or an external person.
- A record of complaints will be maintained, summarised annually for leadership review, and used to improve ministry practice.
- Complaints and feedback are welcomed as a means of strengthening the church's witness and care.
- Complaints made maliciously, dishonestly, or without reasonable basis will not be treated as protected complaints. Where a complaint is found to have been made in bad faith, this may itself be treated as a serious matter and addressed through an appropriate disciplinary or pastoral process.

## 5. Complaint Handling Principles

- Complaints should first be addressed at the lowest appropriate level, starting informally where possible, then escalating only if required.
- Respondents will be informed of allegations and given fair opportunity to respond.
- Investigations and interviews will be impartial, respectful, and timely.
- External agencies or mediators may be engaged at any stage if requested or where independence is appropriate.
- Confidentiality will be maintained except where disclosure is required by law (e.g., mandatory reporting of abuse or risk of harm).
- **Biblical principles:** Complaints should be handled in a spirit of truth and grace (Matthew 18:15–17; Galatians 6:1–2; Ephesians 4:2–3). The goal is restoration, accountability, and unity in Christ.
- **Whistleblower protections:** Anyone raising a complaint in good faith is protected by NZ law under the *Protected Disclosures (Protection of Whistleblowers) Act 2022*.
- When complaints relate to the conduct of a staff member or ministry leader, the expectations outlined in the *City on a Hill Staff Code of Conduct* will be considered in assessing the matter.

- Complainants and respondents are entitled to bring a support person or advocate to meetings, provided that person does not disrupt proceedings or act in an aggressive or intimidating manner.
- **Good faith requirement:** This process assumes all parties engage honestly and in good faith. Scripture calls us to speak truth in love (Ephesians 4:15). Accusations against leaders carry particular weight and responsibility (1 Timothy 5:19). Where a complaint is found to have been fabricated or made with malicious intent, the matter will be referred to the Senior Pastor or Administration Team for consideration of an appropriate response.
- **Conflict of interest:** Any person responsible for handling a complaint who has a personal involvement or conflict of interest in the matter must step aside. In such cases, another appropriate leader, Administration Team member, or independent person will be appointed to oversee the complaint.
- **External reporting:** Where allegations involve criminal conduct, abuse, or risk of harm, the church will comply with all legal reporting obligations and may notify appropriate authorities or professional bodies.

## 6. Complaint Handling Pathways

### 6.1. Informal Complaint

- If appropriate, the complainant should raise the matter directly with the person concerned.
- The person receiving the complaint should seek to respond or acknowledge the concern within 5 working days.
- If unresolved or inappropriate for informal resolution, the complaint may be escalated to a formal complaint.

### 6.2. Formal Complaint

- Submit in writing (e.g., using the feedback form at [cityonahill.co.nz/feedback](http://cityonahill.co.nz/feedback) or via email/letter).
- The relevant Ministry Leader (or Senior Pastor if the complaint involves a Ministry Leader) will acknowledge receipt within 5 working days.
- Investigation and resolution should be completed within 30 days unless exceptional circumstances arise. If longer is required, updates will be provided at least every 10 working days.
- If the complainant is dissatisfied, they may request review by the Senior Pastor, or review by an Administration Team member where the complaint relates to the Senior Pastor.
- All formal complaints (resolved or unresolved) are recorded in the complaints register.

### 6.3. Complaints About Senior Pastor / Administration Team / Trustee

#### **Against the Senior Pastor:**

- Handled by a nominated member of the Administration Team.
- If serious and potentially disqualifying, an independent investigation is commissioned by the Administration Team and Trustees, with findings provided to the Board of Reference for determination of action.
- If not serious enough to require investigation, mediation may be offered.

#### **Against a Trustee or Administration Team Member:**

- Lodged with the Senior Pastor and referred to the Board of Reference for oversight.
- If serious, an independent investigator may be appointed.

### 6.4. Interim Measures During Investigation

The Senior Pastor or an Administration Team member (where the complaint involves the Senior Pastor) may implement interim measures where necessary to protect people, maintain ministry integrity, or allow a fair investigation.

When a complaint involves alleged serious misconduct, the church may:

- Temporarily stand down the person involved from ministry duties;
- Place the person on paid or unpaid leave (if staff);
- Restrict access to certain roles, people, or information;
- Provide alternative duties or ministry reassignment.

These measures remain in place until the investigation is completed or the allegation is resolved.

### 6.5. Possible Outcomes and Sanctions

Following an investigation, the outcomes may include:

- No further action (if the complaint is unsubstantiated);
- Mediation, apology, or reconciliation process;
- Formal warning, supervision, or retraining;
- Removal from a particular role, ministry, or leadership position;
- Where a complaint involves a breach of the *Staff Code of Conduct*, responses may include pastoral correction, supervision, disciplinary action, or employment processes as appropriate;
- Employment or volunteer termination (if appropriate);

- Referral to police or another authority if criminal conduct is suspected.

## 7. Child Safety and Vulnerable People Complaints

This section should be read alongside the City on a Hill Child Protection Policy and Vulnerable People Policy. Complaints involving the safety or wellbeing of a child or vulnerable person will always be treated as serious complaints, regardless of how they are initially raised.

### 7.1. Scope

This section applies to any complaint or concern involving:

- Alleged abuse, neglect, or harm to a child or vulnerable person by any church representative (staff, volunteer, or ministry leader);
- Behaviour by any person that poses a risk to the safety of children or vulnerable people in church activities;
- Breaches of the church's Child Protection Policy or Vulnerable People Policy.

### 7.2. Who to Contact — Safe Ministry Contacts

All child safety and vulnerable people complaints are to be directed to the Safe Ministry Contacts:

- Paul Shoemark — 02041583997 / [paul@cityonahill.co.nz](mailto:paul@cityonahill.co.nz)
- Andrew Southerton — 0223542986 / [andrew@cityonahill.co.nz](mailto:andrew@cityonahill.co.nz)
- Lia Maddock — 0277772008 / [lia@cityonahill.co.nz](mailto:lia@cityonahill.co.nz)

The Safe Ministry Contacts are a sub-committee of the Administration Team and are responsible for managing all concerns under the Safe Ministry Incident Management Process. If a complaint concerns one of the Safe Ministry Contacts, it should be directed to another Safe Ministry Contact or directly to the Administration Team.

### 7.3. Reporting to Authorities

Although New Zealand law does not currently mandate reporting of child abuse, City on a Hill requires all staff and volunteers to report concerns involving the safety or wellbeing of a child or vulnerable person through the Safe Ministry reporting process. Where a complaint gives rise to a reasonable belief that a child or vulnerable person has been, or is at risk of being, abused or neglected, the Safe Ministry Contacts will report to:

- **Oranga Tamariki** — 0508 326 459 / [contact@ot.govt.nz](mailto:contact@ot.govt.nz)
- **New Zealand Police** — where criminal conduct is suspected
- **Abbott Insurance** (City on a Hill's insurer) — as required

These referrals will not wait for the completion of any internal investigation process.

#### **7.4. Complaint Pathway**

1. The concern is raised with a Safe Ministry Contact (see 7.2).
2. The Safe Ministry Contact assesses the concern and initiates the Safe Ministry Incident Management Process, including any mandatory reporting obligations (see 7.3).
3. Interim measures are implemented immediately if the safety of any person may be at risk — including removal of the person concerned from their role pending investigation (see Section 6.4). This is not a presumption of guilt.
4. Where the allegation is serious, an independent investigator is appointed.
5. Parents or guardians of any affected child are contacted as soon as practicable.
6. Findings are entered into the Incident Register. The incident remains open until the Safe Ministry Contacts and Trustees are satisfied the matter has been resolved.
7. Findings in serious matters are provided to the Administration Team and Board of Reference for determination of outcome.

#### **7.5. Confidentiality**

Confidentiality will be maintained as far as possible, but will not prevent the church from fulfilling its reporting obligations or taking immediate protective action. Handling should comply with the Privacy Act 2020.

#### **7.6. Records**

All child safety and vulnerable people complaints will be retained for a minimum of 10 years, or until the child concerned turns 25 — whichever is longer.

### **8. Records & Privacy**

- All formal complaints will be recorded securely.
- Records will be retained for 7 years for serious complaints and 3 years for simple complaints. Except for child safety records, which are subject to the longer retention periods specified in Section 7.6.
- Only those directly involved in handling a complaint will have access to records, and handling will comply with New Zealand privacy legislation.

## **9. Review of Policy**

This policy will be reviewed every two years by the Administration Team in consultation with the Board of Reference, considering feedback from the congregation and changes in best practice.

# Appendix: Decision Flow



