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OPERATING PROCEDURE

Gateway Psychology Ltd's Operating Policies set out the principles, standards and procedures that govern the way the organisation operates. They provide a framework for safe, effective, lawful and ethical practice and apply, as relevant, to employees, contracted Associates, agency workers, contractors and others working on behalf of Gateway Psychology Ltd.

All staff and Associates are expected to familiarise themselves with the policies relevant to their role and to work in accordance with them.

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SIGNATORIES (signed and controlled electronically)

Dr Meryl Ann Forse

Dr M.A. Forse – Managing and Clinical Director

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1. SCOPE AND PURPOSE

- 1.1 This policy sets out Gateway Psychology Ltd's approach to receiving, responding to, investigating and learning from concerns and complaints about the services it provides.
- 1.2 The policy applies to all employees, contracted Associates, agency workers, contractors and other individuals providing services on behalf of Gateway Psychology Ltd.
- 1.3 A concern or complaint may be raised by any person who uses, receives, is affected by, commissions or has a legitimate interest in a service provided by Gateway Psychology. This may include a child or young person, adult client, parent or carer, family member, advocate, Local Authority representative, commissioner or other professional.
- 1.4 A person may raise a complaint on behalf of another individual where they have appropriate authority to do so, or where this is appropriate because of the individual's age, capacity, communication needs or other circumstances. Wherever appropriate, Gateway Psychology will seek and take account of the wishes and views of the person to whom the complaint relates.
- 1.5 Complaints may relate to any aspect of Gateway Psychology's service, including clinical or therapeutic services, assessments, reports, communication, administration, conduct, accessibility, information handling, fees or other aspects of service delivery.
- 1.6 This policy is intended to provide an accessible, fair and proportionate means of resolving concerns and complaints and to support organisational learning and service improvement.
- 1.7 Where a matter raised through the complaints process also gives rise to safeguarding, professional conduct, disciplinary, legal, regulatory or data protection concerns, Gateway Psychology may need to consider or address those matters under the relevant policy, procedure or statutory process in addition to, or where appropriate before, the complaints process.

2 POLICY STATEMENT AND PRINCIPLES

- 2.1 Gateway Psychology Ltd is committed to providing safe, effective, respectful and high-quality psychological services. We recognise that feedback, concerns and complaints provide an important opportunity to resolve difficulties, understand people's experiences, identify areas for improvement and strengthen the quality and safety of our services.
- 2.2 Gateway Psychology welcomes concerns and complaints and will seek to ensure that people are able to raise them without fear of disadvantage, discrimination or adverse treatment. Raising a concern or complaint will not, in itself, adversely affect a person's current or future access to services.
- 2.3 HCPC-registered professionals working for or on behalf of Gateway Psychology are required to comply with the Health and Care Professions Council (HCPC) Standards of Conduct, Performance and Ethics. These include requirements to be open, honest and candid when something has gone wrong; to apologise where appropriate; to support service users and carers who wish to raise concerns; and to provide helpful and honest responses to complaints.
- 2.4 Gateway Psychology will approach concerns and complaints in a way that is fair, objective, proportionate, respectful and, wherever possible, trauma-informed. We will recognise that

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raising a complaint may be difficult or distressing and will seek to minimise unnecessary barriers to participation in the complaints process.

2.5 Gateway Psychology will make reasonable adjustments where required and will seek to ensure that the complaints process is accessible to children, young people and adults with differing communication, language, sensory, cognitive or other needs.

2.6 Complaints will be handled as confidentially as reasonably possible. Information will be shared only where necessary for the purpose of considering or investigating the complaint, responding appropriately, managing risk, meeting safeguarding responsibilities or complying with legal, contractual, insurance or regulatory obligations.

2.7 Gateway Psychology aims to:

- acknowledge receipt of a complaint within three working days;
- consider complaints fairly, objectively and without avoidable delay;
- aim to provide a full written response within 14 working days wherever reasonably practicable;
- where a full response cannot reasonably be provided within 14 working days, explain the reason for the delay, provide an anticipated timescale for completion and keep the complainant appropriately updated;
- communicate outcomes clearly and explain, where appropriate, any action or learning arising from the complaint;
- identify and address themes, risks or opportunities for improvement arising from complaints; and
- ensure that complaints are recorded, retained and handled in accordance with applicable data protection legislation and Gateway Psychology's information governance requirements.

3.0 ROLES AND RESPONSIBILITIES

3.1 Gateway Psychology's Managing and Clinical Director has overall responsibility for ensuring that complaints are managed appropriately and that the organisation maintains effective arrangements for receiving, investigating, responding to and learning from complaints.

3.2 The Director or other senior member of staff appointed to manage a complaint is responsible for ensuring that:

- 3.2.1 the complaint is acknowledged and recorded appropriately;
- 3.2.2 the complainant is informed about the complaints process and expected timescales;
- 3.2.3 the complaint is considered fairly, objectively and proportionately;
- 3.2.4 an appropriate person is appointed to investigate the complaint, taking account of the nature and seriousness of the issues raised and any actual or potential conflict of interest;
- 3.2.5 relevant information and records are obtained and considered as necessary;

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- 3.2.6 the complainant and any member of staff or Associate involved are given an appropriate opportunity to provide relevant information;
 - 3.2.7 safeguarding, professional conduct, data protection, disciplinary, legal, contractual, insurance or regulatory issues identified through the complaint are considered and escalated where necessary;
 - 3.2.8 appropriate communication is maintained with the complainant throughout the process; and
 - 3.2.9 the outcome, any recommendations and any identified learning or actions are appropriately recorded and communicated.
- 3.3 A person who is the subject of a complaint, or who has a material conflict of interest in relation to the matters raised, will not be responsible for investigating or determining the outcome of that complaint. Where a complaint concerns a Director or another senior member of staff, Gateway Psychology will appoint an appropriately senior and suitably independent person to consider the complaint.
- 3.4 All employees, contracted Associates and others working on behalf of Gateway Psychology are responsible for:
- 3.4.1 treating concerns and complaints seriously, respectfully and sensitively;
 - 3.4.2 supporting individuals to raise concerns or complaints and not discouraging or obstructing them from doing so;
 - 3.4.3 informing an appropriate manager promptly when a formal complaint, or a concern that may require formal consideration, is received;
 - 3.4.4 cooperating openly and appropriately with any investigation;
 - 3.4.5 maintaining confidentiality and handling information relating to complaints appropriately; and
 - 3.4.6 implementing any actions or learning arising from a complaint that are relevant to their role.
- 3.5 HCPC-registered professionals remain individually responsible for meeting their professional obligations under the HCPC Standards of Conduct, Performance and Ethics, including their responsibilities in relation to openness and candour, raising concerns, responding to complaints and cooperating with investigations.
- 3.6 Gateway Psychology's management team will periodically review complaints and associated actions to identify recurring themes, risks, learning and opportunities for service improvement. Where appropriate, learning will inform changes to policies, procedures, training, supervision, clinical practice or service delivery.

4.0 COMPLAINTS PROCEDURE

4.1 Raising a Concern or Complaint

A concern or complaint may be raised about any aspect of a service provided by, or on behalf of, Gateway Psychology Ltd. The person raising the concern does not need to determine

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whether the individual concerned is an employee, contracted Associate or other person working on behalf of Gateway Psychology before making a complaint. Gateway Psychology will establish whether the matter falls within the scope of this policy and will advise the complainant if another process or organisation is more appropriate.

Concerns and complaints will be taken seriously regardless of whether they are initially described as a “concern”, “complaint” or by another term. Where it is unclear whether an individual wishes to make a formal complaint, Gateway Psychology will clarify this with them.

4.2 Complaints Involving Senior Staff or Conflicts of Interest

Complaints will be considered by a person who is appropriately senior and, as far as reasonably practicable, independent of the matters being complained about.

A person who is the subject of a complaint, has been directly involved in the matters giving rise to it, or has another material conflict of interest will not investigate or determine the outcome of the complaint.

Where a complaint concerns the Managing and Clinical Director, it will normally be referred to the Business Director or another appropriately experienced and independent senior professional. Where necessary, Gateway Psychology may appoint an external professional or other suitably independent person to investigate or advise on the complaint.

The complainant will be informed who is responsible for managing or investigating their complaint.

4.3 Informal Resolution

Gateway Psychology encourages concerns to be raised at an early stage where the individual feels comfortable doing so, as some concerns can be resolved promptly through discussion, clarification, an explanation, an apology or other appropriate action.

Informal resolution is optional. A person may make a formal complaint at any stage and will not be required to raise or discuss their concern directly with the person who is the subject of the complaint before doing so.

Where informal resolution is attempted, staff will consider the individual's wishes, circumstances and communication needs and will avoid requiring direct contact where this may be inappropriate or distressing.

Where an informal concern identifies a safeguarding issue, significant risk, potential serious professional misconduct or another matter requiring formal action, Gateway Psychology may

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need to escalate the matter even where the individual does not wish to pursue a formal complaint.

4.4 Who Can Make a Complaint

A complaint may be made by any person who uses, receives, commissions or is directly affected by a service provided by Gateway Psychology, including children and young people, adult clients, parents or carers, family members, advocates, Local Authority representatives, commissioners and other professionals.

A complaint may also be made on behalf of another person where the complainant has appropriate authority to act for them, or where this is appropriate because of the person's age, capacity, communication needs or other circumstances.

Where a complaint is made on behalf of another person, Gateway Psychology will consider whether consent or other authority is required before disclosing information or discussing the person's care or service. Where appropriate and practicable, the views and wishes of the person to whom the complaint relates will be sought and taken into account.

Children and young people may make a complaint themselves and do not have to rely upon a parent or carer to raise a concern on their behalf.

4.5 Accessibility and Support

Gateway Psychology is committed to ensuring that the complaints process is accessible. Reasonable adjustments will be made where required and appropriate support will be offered according to the individual's needs.

This may include:

- accepting a complaint verbally rather than in writing;
- providing information in an accessible or Easy Read format;
- supporting the use of an interpreter or other communication support;
- allowing additional time or alternative methods of communication;
- allowing a trusted person, parent, carer or advocate to support the individual during the process; and
- adapting meetings or discussions to take account of communication, sensory, cognitive, developmental or other needs.

For children and young people, information about the complaints process will be provided in a way that is appropriate to their age, developmental level and communication needs.

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Gateway Psychology will seek to manage complaints in a trauma-informed manner and will avoid unnecessary repetition of distressing information or requiring direct contact between a complainant and the person complained about where this is not necessary or appropriate.

4.6 How to Make a Formal Complaint

A formal complaint may be made in writing, electronically or verbally. Complainants may use Gateway Psychology's Complaint Form (GA-FRM-001), but use of the form is not mandatory.

Complaints should normally be directed to the Managing and Clinical Director or Practice Manager using Gateway Psychology's published contact details. Where a verbal complaint is made, Gateway Psychology will make an appropriate written record of the complaint and, where necessary, confirm its understanding of the issues raised with the complainant.

Complainants are encouraged to provide as much relevant information as they reasonably can, including:

- what happened and, where known, when it happened;
- the service or individual involved;
- why they are dissatisfied or concerned;
- any relevant supporting information or documentation; and
- what they would like Gateway Psychology to consider doing to resolve the matter.

A complaint will not be rejected solely because information is incomplete, the Complaint Form has not been used or the complainant requires support to communicate their concerns.

Gateway Psychology will only request personal information that is reasonably necessary to consider and respond to the complaint.

4.7 Safeguarding and Immediate Risk

Where a complaint raises concerns about actual or potential abuse, neglect, exploitation, significant harm or another safeguarding risk to a child or adult, Gateway Psychology's safeguarding procedures will take priority where necessary.

The concern will be referred promptly to the appropriate Designated Safeguarding Lead and, where required, to the relevant Local Authority, police or other statutory agency in accordance with Gateway Psychology's safeguarding policies and legal obligations.

The complaints process may continue alongside safeguarding procedures where it is safe and appropriate to do so. In some circumstances, consideration of all or part of a complaint may need to be paused to avoid prejudicing a safeguarding, police, regulatory or other formal investigation. Where possible and appropriate, the complainant will be informed if this occurs.

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Information may be shared without consent where this is necessary and lawful to protect a child or adult from harm or to meet another legal or safeguarding obligation.

4.8 Time Limit for Making a Complaint

Complaints should normally be raised within three months of the event giving rise to the complaint or, where the issue was not apparent at the time, within three months of the complainant becoming aware of it.

Gateway Psychology may consider a complaint outside this period where there is a reasonable explanation for the delay and it remains possible to consider the complaint fairly and effectively.

In deciding whether to accept a complaint outside the usual time limit, Gateway Psychology will take account of the individual circumstances, including the complainant's age, disability, communication needs, capacity, trauma or safeguarding circumstances, the nature and seriousness of the issues raised, when the complainant became aware of the matter and the availability of relevant records or other information.

4.9 Acknowledgement and Initial Review

Gateway Psychology will acknowledge a formal complaint within three working days of receipt.

The complaint will be recorded and an initial review undertaken to:

- identify the issues being raised;
- determine whether the complaint falls within the scope of this policy;
- identify any immediate safety, safeguarding or other risks;
- identify any potential conflicts of interest;
- determine who should manage or investigate the complaint;
- consider whether another Gateway Psychology procedure or external process also applies; and
- determine whether any reasonable adjustments or other support are required.

Where appropriate, Gateway Psychology may contact the complainant to clarify the matters they would like investigated and the outcome they are seeking.

4.10 Investigation and Response

Complaints will be investigated in a manner that is fair, objective and proportionate to the nature and seriousness of the matters raised.

The investigation may include reviewing relevant clinical, administrative or other records; correspondence and documentation; obtaining information from employees, Associates or

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other relevant individuals; and seeking further information from the complainant where necessary.

Individuals whose actions or decisions are the subject of a complaint will be given an appropriate opportunity to respond to the matters raised.

Gateway Psychology will aim to provide a full written response within 14 working days wherever reasonably practicable.

Where this is not possible because of the complexity of the complaint, availability of relevant individuals or information, involvement of another organisation or another reasonable cause, Gateway Psychology will inform the complainant of the reason for the delay, provide an anticipated timescale for completion and keep them appropriately updated.

The final response will, as appropriate:

- summarise the issues considered;
- explain how the complaint was considered or investigated;
- set out Gateway Psychology's findings and the reasons for them;
- acknowledge where something could or should have been done differently;
- provide an apology where appropriate;
- explain any actions, recommendations or learning arising from the complaint, insofar as these can appropriately be shared; and
- explain how the complainant may request a review if they remain dissatisfied.

4.11 Complaint Outcomes

A complaint may be upheld, partially upheld, not upheld, or Gateway Psychology may determine that there is insufficient information available to reach a finding on a particular issue.

A complaint will not be treated as unsubstantiated solely because there is no independent evidence supporting the complainant's account. Findings will be based on the information reasonably available and the circumstances of the individual complaint.

Where the person complained about is no longer employed or engaged by Gateway Psychology, the organisation will still consider whether it is reasonably possible and appropriate to investigate the complaint, particularly where there may be organisational learning, safeguarding, risk-management or professional issues requiring consideration.

Where appropriate, a complaint may result in changes to practice, policy, procedures, training, supervision or service delivery, or referral to another internal or external process. Confidential

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employment, disciplinary or professional information about another individual will not normally be disclosed to the complainant.

4.12 Requesting an Internal Review

If the complainant is dissatisfied with the outcome of their complaint, they may request an internal review within 14 working days of receiving the final response.

The request should explain, as far as possible, why the complainant remains dissatisfied, for example because they believe relevant information was not considered, the complaints process was not followed appropriately, or the conclusions reached do not reasonably reflect the information available.

Where reasonably practicable, the review will be undertaken by a senior person who was not responsible for the original investigation or decision.

The purpose of the review is to consider whether the complaint was handled fairly and appropriately and whether the conclusions reached were reasonable on the information available. It is not normally a complete reinvestigation of the complaint unless the reviewer considers that further investigation is necessary.

The complainant will be informed in writing of the outcome of the review and whether any further action will be taken.

4.13 External Escalation

Completion of Gateway Psychology's complaints process does not remove or restrict an individual's right to raise a concern directly with an appropriate regulator, statutory body, commissioner or other organisation where they are entitled to do so.

Where a concern relates to the fitness to practise of an HCPC-registered professional, the individual may raise the matter with the Health and Care Professions Council (HCPC). The HCPC's fitness to practise process has a different purpose and remit from Gateway Psychology's internal complaints procedure.

Where a complaint concerns Gateway Psychology's handling of personal information, the individual may also have the right to raise their concern with the Information Commissioner's Office (ICO).

Where services have been commissioned or funded by a Local Authority, other public body or another organisation, the complainant may also have rights under that organisation's complaints, commissioning or contractual arrangements.

Gateway Psychology will provide appropriate information or signposting about relevant external routes where applicable. Individuals are not required to complete Gateway Psychology's internal

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complaints process before approaching an external body where that body permits them to raise the matter directly.

4.14 Data Protection Complaints

There a complaint concerns Gateway Psychology's collection, use, disclosure, accuracy, security, retention or other processing of personal information, the complaint will also be considered in accordance with applicable UK data protection legislation and Gateway Psychology's data protection and information governance procedures.

Data protection complaints will be acknowledged, investigated and responded to within the applicable statutory timescales. Gateway Psychology will provide the complainant with information about the outcome and, where applicable, their right to complain to the Information Commissioner's Office.

Where a complaint includes both service-related and data-protection concerns, Gateway Psychology may consider the matters together where appropriate, while ensuring that the requirements applicable to the data-protection complaint are met.

4.15 Confidentiality During the Complaints Process

Information relating to a complaint will be handled confidentially and shared only with those who reasonably require access to it for the purpose of considering, investigating or responding to the complaint, obtaining appropriate professional or legal advice, managing risk or fulfilling safeguarding, regulatory, contractual, insurance or legal obligations.

The privacy and confidentiality of the complainant, the person receiving services and any employees, Associates or other individuals involved will be respected throughout the process.

Information obtained through the complaints process will be processed in accordance with Gateway Psychology's Confidentiality and Data Protection Policy and applicable data protection legislation.

4.16 Unreasonable, Persistent or Abusive Behaviour

Gateway Psychology recognises that people may be distressed, angry or frustrated when raising a complaint and will seek to respond with sensitivity and understanding. A complainant will not be considered unreasonable solely because they are persistent, express strong emotions, disagree with Gateway Psychology's findings or require additional support to participate in the complaints process.

Where behaviour becomes abusive, threatening, discriminatory or persistently prevents the complaints process from being progressed reasonably, Gateway Psychology may put proportionate arrangements in place to manage future communication.

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Any restrictions will be based on the individual's behaviour rather than the fact that they have complained, will take account of any known communication or support needs, and will be explained to the individual wherever appropriate. Restrictions will not prevent Gateway Psychology from considering legitimate new concerns, safeguarding matters or significant new information.

5.0 MONITORING, LEARNING AND IMPROVEMENT

- 5.1 Gateway Psychology Ltd is committed to using concerns and complaints as a source of learning and service improvement. The purpose of the complaints process is not only to respond to the individual concern raised, but also to identify whether changes are required to reduce the likelihood of similar issues arising in the future.
- 5.2 Complaints and their outcomes will be recorded centrally and reviewed periodically by the management team. This review will consider, where appropriate:
 - 5.2.1 the number and nature of complaints received;
 - 5.2.2 recurring issues, themes or patterns;
 - 5.2.3 whether complaints have identified risks relating to clinical practice, safeguarding, service delivery, communication, administration, accessibility or information governance;
 - 5.2.4 whether agreed response timescales have been met;
 - 5.2.5 actions and recommendations arising from complaints and whether these have been completed;
 - 5.2.6 whether similar concerns have arisen previously; and
 - 5.2.7 opportunities to improve the quality, safety and accessibility of Gateway Psychology's services.
- 5.3 Where learning or improvement needs are identified, appropriate actions will be agreed, allocated and monitored. These may include:
 - 5.3.1 amendments to policies, procedures, forms or guidance;
 - 5.3.2 changes to clinical or administrative processes;
 - 5.3.3 additional training, supervision or professional development;
 - 5.3.4 improvements to communication or information provided to clients, families, commissioners or professionals;
 - 5.3.5 changes to service delivery or accessibility arrangements; and
 - 5.3.6 wider organisational or quality-improvement actions.
- 5.4 Where appropriate, anonymised learning from complaints may be shared with employees and Associates through team meetings, supervision, training, clinical governance or other appropriate forums. Information will be shared in a way that protects the confidentiality and privacy of those involved.
- 5.5 Where a complaint identifies a significant or systemic risk, safeguarding concern, serious professional concern or other matter requiring action beyond the complaints

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process, this will be escalated promptly through the appropriate Gateway Psychology governance arrangements and, where required, to an appropriate external body.

5.6 Complainants will, where appropriate, be informed of actions taken or planned as a result of their complaint. Gateway Psychology will not disclose confidential information relating to another individual's employment, disciplinary action, health, personal information or professional circumstances where it would be inappropriate or unlawful to do so.

5.7 Learning from complaints will contribute to Gateway Psychology's wider quality assurance and continuous improvement processes and will be considered alongside other relevant sources of feedback, incidents, safeguarding information, service-user feedback and organisational learning.

6.0 RECORD KEEPING, CONFIDENTIALITY AND DATA PROTECTION

6.1 Gateway Psychology Ltd will maintain appropriate records of concerns and formal complaints received and their management and outcome. Complaint records will be accurate, relevant and sufficiently detailed to demonstrate how the complaint was considered and resolved.

6.2 Records may include, as appropriate:

- 6.2.1 the original complaint or record of a verbal complaint;
- 6.2.2 correspondence and communication with the complainant;
- 6.2.3 relevant information, documentation or evidence considered during the investigation;
- 6.2.4 records of discussions or information provided by employees, Associates or other relevant individuals;
- 6.2.5 investigation notes and findings;
- 6.2.6 the final response and any internal review outcome;
- 6.2.7 actions, recommendations and organisational learning arising from the complaint; and
- 6.2.8 records demonstrating that agreed actions have been completed or appropriately monitored.

6.3 Complaint records will be stored securely, and access will be restricted to individuals who have a legitimate need to access the information for the purposes of complaint handling, governance, safeguarding, professional practice, legal or regulatory requirements, or another lawful purpose.

6.4 Information relating to complaints will be processed in accordance with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, and Gateway Psychology's Confidentiality and Data Protection Policy and Records Retention arrangements.

6.5 Personal information collected or created through the complaints process will be limited to information that is relevant and reasonably necessary for the

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management, investigation and resolution of the complaint and any associated safeguarding, legal, regulatory, professional or governance requirements.

- 6.6 Complaint information will not normally be recorded within a client's clinical record unless it is relevant to their clinical care, treatment, assessment, risk management or the safe and effective provision of services. Where information relating to a complaint is clinically relevant, an appropriate record may be made in accordance with Gateway Psychology's record-keeping requirements.
- 6.7 Complaint records will be retained in accordance with Gateway Psychology's Records Retention Schedule and applicable legal, regulatory, contractual and professional requirements. Records will not be retained for longer than is necessary for the purposes for which they are held, taking account of the nature of the complaint, the age of the service user where relevant, safeguarding considerations and any potential or ongoing legal, regulatory or professional proceedings.
- 6.8 Where a complaint concerns the handling of personal information, Gateway Psychology will ensure that the complaint is managed in accordance with the applicable requirements for data protection complaints. This includes appropriately recording and investigating the complaint, responding within applicable statutory timescales and informing the complainant of their right to raise their concern with the Information Commissioner's Office where relevant.
- 6.9 Requests by individuals to exercise their data protection rights in connection with complaint records, including rights of access, rectification or restriction where applicable, will be managed in accordance with Gateway Psychology's data protection procedures. The existence of a complaint does not remove an individual's data protection rights, although those rights may be subject to applicable legal exemptions.
- 6.10 Where anonymised information from complaints is used for audit, training, service evaluation or organisational learning, reasonable steps will be taken to ensure that individuals cannot be identified from the information shared.

4.0 CROSS REFERENCES WITH OTHER POLICIES, PROCESSES OR FORMS

4.1 Complaint Form	GA-FRM-001
4.2 Safeguarding Children Policy	GP-POL-003
4.3 Safeguarding Vulnerable Adults Policy	GP-POL-011
4.4 Confidentiality and Data Protection Policy	GP-POL-006

CHANGE HISTORY

Details of Change	Date of Change	Issue Level
Draft issue	3/12/2013	0
Initial Issue	22/6/2014	1
Annual Review – no changes made	23/05/2015	2
Section 4.2 added	4/7/16	3
Annual Review – no changes made	24/1/18	4
Annual Review – no changes made	31/07/2019	5
Annual Review – no changes made	09/08/2021	6
Annual Review – no changes made	06/06/2022	7
Annual Review – no changes made	21/05/2023	8
Annual review – minor wording changes (typos)	23/04/2024	9
Annual review – addition of safeguarding information, retention of records, learning and improvement, unhappy with outcome	20/04/2025	10
Full policy review and revision. Updated in line with current HCPC Standards of Conduct, Performance and Ethics, UK data protection requirements and complaints-handling best practice. Expanded scope and accessibility provisions; strengthened trauma-informed approach, impartiality and conflict-of-interest arrangements; clarified informal and formal complaints processes, safeguarding escalation, investigation, outcomes and internal review; added data protection complaints, record keeping, confidentiality, organisational learning and external escalation provisions.	23/06/2026	11