



# **Complaints Procedure**

**FEBRUARY 2026**

**DATED**

## Complaints Procedure

### 1. Overview

- 1.1. If you are unhappy with any part of our service or have a complaint to make, we would like to know about it as soon as possible to resolve the situation quickly.
- 1.2. All complaints will be treated seriously and confidentially.
- 1.3. Bearing in mind that any experience of making a complaint may be an intimidating one, we would consider it acceptable for any client to be accompanied by a friend when making a complaint to **direction**. This measure is designed to protect any individual who might be disabled or disadvantaged in any way by age, physical or psychological impairment, or fear.
- 1.4. **direction** will take you through the complaints procedure. Additional advice and assistance to enable you to understand the complaints procedure can be obtained from organisations such as the Citizen's Advice Centre or local advocacy group.
- 1.5. All staff, individuals (paid and volunteer), contractors or groups carrying out work related to counselling and psychotherapy on behalf of **direction** are aware of this Complaints Procedure.

### 2. Scope of this Complaints Procedure

- 2.1. This procedure covers complaints against members of staff, individuals (paid and volunteer), contractors and groups carrying out work related to counselling and psychotherapy on behalf of **direction**.

### 3. Aims of the Complaints Procedure

- 3.1. To enable a complaint to be investigated in a fair manner.
- 3.2. To enable complaints to be resolved as speedily as possible.
- 3.3. To allow consequences of mistakes to be put right without unnecessary conflict.
- 3.4. To improve the quality of the service.

### 4. Access to this Complaints Procedure

- 4.1. This Complaints Procedure can be accessed as follows:
  - It can be viewed and downloaded as a PDF from the "About Us" page of the **direction** website.
  - A copy is available from the consulting room of the **direction** offices.
  - A copy can be requested by phone, email, letter, or in person from the **direction** offices.
  - If you require the procedure in a different language or format, please ask and we will try and accommodate that request.

### 5. Who can complain

- 5.1. A member of the public, seeking, receiving or having received counselling or psychotherapy provided by **direction** and other services which pertain to counselling.

- 5.2. An appropriately authorised third party or representative e.g. social workers and legal guardians can bring a complaint on behalf of a minor and/or an adult lacking capacity.
- 5.3. Third parties are those who have not personally received services related to counselling and psychotherapy from **direction**.
- 5.4. Complaints will not be accepted from third parties who are acting on behalf of complainants e.g. professionals such as solicitors, accountants, claims management companies, friends, colleagues, consumer advisers, councillors, and elected members of parliament.
- 5.5. Anonymous complaints will be investigated by the Managing Director, who will use discretion in assessing what action should be taken.

## **6. Time limits for complaints**

- 6.1. Complaints can be accepted up to three years from the time of the problem arising. If the complaint refers to specific client work the maximum is three years from the date the client ended counselling with **direction**.
- 6.2. Complaints will be accepted outside of this limit if they are deemed to be in the public interest.
- 6.3. However, it is much easier to sort out difficulties if the complaint is brought to our attention as quickly as possible.

## **7. How to Make a Complaint**

- 7.1. If the complainant is a face to face counselling client, complaints should be made in the first instance to their counsellor, either verbally or written.
- 7.2. If the matter cannot be resolved satisfactorily, the complainant should express their concern in writing, by email or letter to the Managing Director of **direction**:

Ange Cameron,  
Managing Director,  
**direction**,  
7a Haddington Place,  
Edinburgh,  
EH7 4AE.

Tel: 07760196321  
Email: [enquiries@direction.org.uk](mailto:enquiries@direction.org.uk)

- 7.3. If the complainant has any difficulty making a complaint in person or in writing, please let us know and assist as much as possible. They may also wish to contact their local Citizens Advice Centre or advocacy service.

## **8. Confidentiality and Communications**

- 8.1. Every complaint will be treated with care and confidentiality. We will attempt to communicate clearly

and directly with all complainants or their representatives in a timely manner, as described below.



- 8.2. If appropriate, the complainant may be advised at this stage that evidence is being gathered to support the continued investigation of the complaint.
- 8.3. The complainant may be required to provide permission for confidential information pertinent to the investigation to be disclosed to the members of the investigation.

### **9. Stage 1 – Informal Complaint**

- 9.1. Every opportunity will be taken at the time of the initial complaint to settle the concern informally. This may include telephone conversations and/or face to face meetings or written explanation of the reasons for a decision taken.
- 9.2. The Managing Director will normally handle the complaint at this stage, however, if they are the subject of the complaint, then an independent and impartial person will undertake the response to the complaint and manage the complaints procedure.
- 9.3. If the complainant remains dissatisfied with the outcome of discussions at this stage, then a formal complaint can be made.

### **10. Stage 2 – Formal Complaint**

- 10.1. A formal complaint will be acknowledged in writing by the Managing Director within seven days. A copy of the Complaints Procedure will be enclosed. If an employee, former employee volunteer or contractor of **direction** is the subject of the complaint, they will be sent a copy of the complaint along with the Complaints Procedure.
- 10.2. All notes of clients of **direction** are held under BACP regulations for a 5-year period. If the counsellor has left the organisation, the counsellor will be asked to respond to any complaint within that time frame, under their current working agreement.
- 10.3. An independent and impartial person who has relevant experience will be appointed by the Managing Director to investigate the formal complaint. This person will be independent of **direction** and the complainant, and all parties involved will be given the opportunity to declare a conflict of interest with them.
- 10.4. The investigator will make a thorough and confidential investigation of the complaint, contacting both the complainant and the person complained against. The independent investigator shall review the evidence and decide whether there is a case to answer. The report shall be sent to COSCA when the process is complete.
- 10.5. The investigator will have access to relevant documents and policy papers within **direction** and to staff, volunteers and contractors, if appropriate.
- 10.6. They may ask for evidence from either party and if this is sought in person, they will meet with each party separately.
- 10.7. All parties will have the right to be accompanied, and/or be represented, by a supportive person of

their choice.



- 10.8. The complainant and the party or parties complained against and/or their representative will not be asked to attend any meetings together.
- 10.9. The investigator will make a written response to the complainant within twenty-eight days, a copy of which will be sent to **direction** and the person complained against.
- 10.10. If it is not possible to respond within twenty-eight days, the complainant will be informed of any reasons for a delay. All investigations will be completed and responded to within a maximum of six months.
- 10.11. The investigator will make recommendations regarding the action required to bring about the resolution of the complaint and any sanctions which he/she may consider appropriate to apply to either party. In such circumstances, he/she will also provide instructions for the monitoring of the fulfilment of said actions or sanctions.
- 10.12. For employees of **direction** these may include further training and development or disciplinary action in accordance with the Disciplinary Procedure.
- 10.13. For consultants or other contracted workers, sanctions may include curtailment of work with **direction**.
- 10.14. At this stage, a Report at the Conclusion of Complaints Proceedings will be sent to COSCA by the investigator.
- 10.15. The person managing the complaint may halt the procedure at any stage if it emerges that legal action is under way, pending or intended, until such time as any legal process is complete.

### **11. Stage 3 – Appeal**

- 11.1. A complainant may appeal against the findings of the investigator on the following grounds:
  - That the complaints procedure had not been followed.
  - That there was new evidence which the investigator did not have access to in the investigation.
- 11.2. An appeal cannot be accepted only on the grounds that the complainant disagrees with the investigator's report.
- 11.3. The complainant must make an appeal in writing within fourteen days of the receipt of the investigator's report.
- 11.4. The reasons for the appeal must be clearly set out in writing.
- 11.5. The appeal will be acknowledged in writing by the Managing Director within seven and considered by the management of **direction**.

- 11.6. The complainant will be informed in writing within twenty-one days whether the appeal is accepted or not.
- 11.7. If an appeal is accepted, the Managing Director will arrange to set up an Appeals Panel. The panel will be impartial and independent of the complainant and the person being complained against. They will act confidentially in their handling of the appeal.
- 11.8. The panel will meet within twenty-eight days of the notification of the acceptance of the appeal to the complainant.
- 11.9. No-one on the panel will have taken any part in the previous handling of the complaint.
- 11.10. Fourteen days written notice of the date of the hearing and the composition of the panel will be given to all parties.
- 11.11. All documentation relating to the appeal will be copied to all parties and the panel members fourteen days before the hearing.
- 11.12. The complainant and the complained against may be asked to make a written statement to the panel which will be circulated seven days before the hearing.
- 11.13. The complainant and complained against may be required to attend the hearing and may be accompanied, and/or be represented, by a supportive person of their choice.
- 11.14. The complainant and complained against will have the opportunity to make a short statement to the hearing.
- 11.15. The investigator and the Managing Director (whoever managed the original complaint) will be available to give information to the panel.
- 11.16. The appeal hearing will be recorded.
- 11.17. The appeal panel will have the authority to adjourn the hearing. If adjournment occurs, the case will be restarted in a reasonable time scale at the same point at which the adjournment occurred.
- 11.18. The panel will come to a decision regarding the appeal in private session. This discussion will not be recorded but a written record will be made of the proceedings.
- 11.19. The decision will be given in writing to both parties within seven days.
- 11.20. If the appeal is upheld the panel will make recommendations regarding the action required to bring about the resolution of the complaint.
- 11.21. **direction** will abide by the decision and recommendations of the appeal panel.

11.22. At any stage of the complaints process **direction** retain the right to seek external legal advice

11.23. **direction** will maintain a record of the complaints and recommendations to ensure that any sanctions are recorded, controlled, imposed and then updated to the relevant complainant and any regulatory bodies as necessary.

## **12. Discontinuation of Complaints**

12.1. A complaint can be discontinued if:

- The complainant fails or refuses to participate at any stage of the complaint procedure without good reason
- Or the complainant formally withdraws the complaint
- And both parties will be informed

***This is the end of the Complaints Procedure.***

## **13. Monitoring of Complaints**

13.1. A record will be kept of all complaints received. Anonymous complaints will also be recorded, including the reasons for any decision to pursue or not to pursue the complaint. Complaints will be monitored regularly by the Managing Director.

13.2. Complaints regarded as malicious or vexatious shall be recorded internally for learning purposes. Reports need not be published or passed to other bodies

13.3. Records of complaints will be kept for a period of five years.

## **14. Complaints to COSCA**

14.1. COSCA is the professional body for counselling and psychotherapy in Scotland and provides formal professional recognition for **direction** and we are therefore also covered by the COSCA Complaints Procedure.

14.2. In the event that **direction's** Complaints Procedure is exhausted, and a complainant is not satisfied with the outcome, they can submit a complaint to COSCA under its Complaints Procedure.

14.3. The Complainant must submit a complaint within one month of the above exhaustion.

14.4. The Complainant will be informed that COSCA will, on receipt of the complaint, verify that the member's complaints procedure has been followed and the outcome was lawful, reasonable and properly explained.

14.5. The Complainant will be informed that COSCA will publish upheld complaints and their sanctions regarding COSCA Individual Members or Member Organisation.

14.6. Information on COSCA's Complaints Procedure can be found in **direction** premises or on the COSCA website.



Contact details for COSCA are:  
COSCA,  
16 Melville Terrace,  
Stirling,  
FK8 2NE  
01786 475140  
[www.cosca.org.uk](http://www.cosca.org.uk)