



IACST COMPLAINTS POLICY

(May be called the Comments and Complaints Policy?)

1. Rationale and Policy Considerations

The Complaints Policy in relation to the practice of providing craniosacral therapy means a policy setting out the procedures for both making and dealing with complaints about any aspect of the service.

A clear and effective Complaints Policy is an important part of providing quality craniosacral therapy. Even where every effort is made to meet quality standards, those who use a service may not always feel satisfied with the type, level or quality of the service that is provided.

Although complaints can be difficult to receive and respond to, acting on a complaint appropriately, efficiently and promptly can help upgrade service quality and is important for the reputation of the craniosacral therapy and to help ensure positive relationships.

The goals of this policy are to ensure that:

- Anyone who comes into contact with the therapy will be assured that if they ever have a comment to make or need to make a complaint it will be welcomed and responded to appropriately.
- Details of the Complaints Policy and Procedures will be available to practitioners and clients on the Irish Association of Craniosacral Therapists website at www.IACST.ie
- All practitioners and therapists are aware that if they receive a complaint there is a clear and specific procedure in place to deal with it in a confidential manner.
- Complaints are taken seriously, resolved efficiently and effectively, and recorded appropriately.

Legislation and regulatory requirements

Having a clear, written policy and procedure on complaints is a requirement of the **?????**, which also sets out what is to be included in a Complaints Policy.

Children's needs

Children need their parents/guardians to be able to easily, safely and effectively raise concerns with or about the therapy provided, on behalf of their children, to ensure that the quality of care and therapy they receive is always safe and of good quality.

Clients needs:

- Feel comfortable about approaching a therapist/practitioner to comment on:
 - the way therapy is conducted; and
 - the way the therapy does or does not work for their children

- Feel able, and supported, to make a complaint about any aspect of therapy provision without fear of a negative impact on their child's experience in the setting.
- Know that they will be kept informed about the progress of any investigation into their complaint and about the outcome of the investigation

Association members

need to know:

- That the complaints policy welcomes and accepts any comments or complaints.
- What the procedure is if any client, parent of any client or other individual raises a concern with them and/or makes a complaint about any aspect of the service.
- Who is responsible for managing complaints,
- Who must carry out investigations.
- Who is responsible for recording information about the complaint and the details that should be recorded.
- That they absolutely must ensure that no complaint results in any negative impact on any client's therapy.

The Association needs:

- To acknowledge the possibility of complaints and be very clear on how they will receive, manage, investigate and record any complaints in advance of any being made.
- To ensure that the policy and procedures relating to comments and complaints is clear, comprehensive and meets the requirements of all relevant legislation and regulations, in particular the Data Protection legislation.
- To know that all members of the Association will be clear on their roles and responsibilities in relation to receiving comments or complaints from clients, parents/guardians or others, about any aspect of the therapy provided.
- To ensure those clients, parents/guardians and other stakeholders can be given clear policy information on registration as well as in the event of a complaint being made.
- To be clear on the roles of the Association, the HSE, the Health and Safety Authority and An Garda Síochána in relation to investigating certain complaints.

National Quality Frameworks

- ??????

2. Definitions/Glossary

[Include definitions here of any words used that may need explanation.]

	Irish Association of Craniosacral therapists and it's committee
IACST	members
Clients	Adults, parents or guardians of any baby or child

3. Policy Statement *[Outlines the principles, values and purpose of the policy. It will generally be quite short. The Policy Statement can be included in the Members section of the Association website]*

[Name the practice] is committed to providing a quality service to adults, children and their parents/guardians and I/we regularly evaluate our services in order to ensure this and to monitor the standard of my/our performance.

While this is always my/our aim, I/we accept that sometimes things do not always go to plan. In such circumstances, I/ we want to know, so that I/we can put things right and learn from my/our mistakes.

I/We welcome all comments on my/our services, positive or negative. Complaints can be directed to the Irish Association of Craniosacral Therapy and my membership number is _____ and the complaint will be investigated irrespective of the nature of the complaint or who the person making the complaint is.

[Name the therapist/practice] gives a commitment to resolve complaints as quickly as possible. All complaints will be dealt with seriously, sensitively and appropriately to ensure that the standard of service provided by *[name of therapist/ practitioner]* is maintained at a high level. The quality of the service provided to any client, child and family will never be adversely affected because a complaint has been made.

The complaints procedure is kept as simple as possible. Anyone making a complaint will be supported through the process as needed and given a copy of the 'Complaints Policy and Procedures'. The complaints policy and procedures are displayed *[name location in your practice where policy is on display]*.

When a complaint is received by the therapist, where the complaint cannot be resolved directly with the client, parent or guardian, they will direct the client, parent or guardian of their right to contact the IACST. Where every effort will be made to address the issue informally before moving to a formal procedure.

If necessary the complaint will be fully and appropriately investigated. A written acknowledgment of receipt of the complaint will usually be sent within ... working days and a response within ... days.

Where a complaint concerns a member of staff, we will address the situation with due regard to our obligations as an employer and the rights of the employees, the terms governing their conditions of employment and the procedures outlined in the staff handbook. *For examples of other sources of information*

- *The National Employment Rights Agency: Workplace Solutions:*
- *Workplace Relations: Code of Practice on Grievance and Disciplinary Procedures.*

If a complaint is made against the Manager, a representative of the management committee (usually the chairperson) will conduct an investigation and ensure appropriate management and recording of the complaint.

[In the case of a private service you will need to identify here who will investigate a complaint should it be a complaint involving the owner.]

In the event of errors being made, *[name the service]* will endeavour to correct them as quickly as possible and to give an explanation and, where appropriate, an apology.

All complaints made – both formal and informal – will be recorded in detail. Records will be stored in the Complaints Records File and will be retained for at least two years following resolution of the complaint as required by regulation.

All information relating to any complaint will be treated as confidential and shared only on a need to know basis. In the case of a Child Protection concern the Child Protection Policy will apply. All records of complaints will be kept in full compliance with the [Child Care Act 1991 \(Early Years Services\) Regulations 2016](#), [Data Protection Act 2018](#) and [Freedom of Information Act 2014](#). The Complaints Records File will be available to those authorised to inspect it, including the Tusla Early Years Inspector.

The evaluation of the outcome of the complaint will form part of the considerations for future policy and practice and risk management procedures.

4. Procedures & Practices *[Outlines the specific steps and/or guidance to be followed in order to implement the policy.]*

How a complaint is received

[Name the Therapist] is committed to open and regular communication with clients. We welcome all comments on my/our services, whether they are positive or negative.

Complaints will be accepted irrespective of the nature of the complaint or who the person making the complaint is.

How to make a complaint

A complaint can come to the attention of the Therapist in a number of different ways:

- Contact, by phone or in person, with a staff member or by letter, email, and/or text.
- The complaint may be made by the person directly affected or by a person acting on their behalf.

To whom a complaint can be made

If a person has a complaint about some aspect of the therapist's activity, or about the conduct, it will often be possible to resolve the problem by simply speaking to the individual concerned.

Some complaints may fall more into the category of disagreements or differences of opinion, and may be resolved through discussion and compromise on the part of both the person making the complaint and the therapist/ practitioner concerned.

How a complaint will be managed

Stage One: Informal Process

In the first instance, those who wish to make a complaint are encouraged to speak directly to the relevant therapist/practitioner.

The details of the complaint and the response will be recorded by the *therapist/practitioner*.

If a satisfactory resolution cannot be found, then Stage Two of the procedure will formally come into operation.

Stage Two: Formal Process

If informal discussions of a complaint or problem have not produced a satisfactory resolution to the situation, those making the complaint should be encouraged to put their complaint in writing to the *IACST* using the form attached to this policy [*see sample form attached*]. All necessary support will be provided. Relevant names, dates and any other important information on the nature of the complaint should be included.

IACST will acknowledge receipt of the complaint in writing as soon as possible – usually within ... working days – and fully investigate the matter within ... working days. If there is any delay, those who made the complaint will be advised of this and offered an explanation. The *IACST* and its committee are responsible for sending them a full and formal written response to their complaint.

The *IACST*, with the assistance of appropriate information and paperwork, will carry out a full investigation. This may involve:

- Interviews with all relevant individuals
- Minute taking of all meetings
- Individuals being informed that they may have an appropriate individual present with them during the investigation.

Where no grounds for the complaint are found, the person making the complaint will be notified and information detailing the next stage will be provided.

Where the IACST and its Disciplinary committee investigating (not to include the chairperson of the IACST), finds grounds for the complaint, they will ensure that all of the required details are available from the person making the complaint (using the Complaints Form, see Appendix A).

The association member must participate and support the investigation of any complaint, where requested. Any association member involved in the complaint will be supported throughout the process and are referred to the panel of association members who offer their support and services for any other member who is dealing with this process.

Any complaints not within the scope of the IACST to investigate, will be referred appropriately. For example:

- If the *IACST and its committee members* have good reason to believe that the situation has Child Protection implications, they must inform the designated Child Protection Officer [*Note: In many services the manager is the designated Child Protection Officer*] and ensure that the local Tusla Duty Social Worker is contacted, according to the procedure set out in the Child **Safeguarding policy**.
- If any person involved in the complaint has good reason to believe that a criminal offence has been committed they should contact An Garda Síochána.

Where a complaint relates to Health and Safety it may be appropriate to notify the Health and Safety Authority.

Communication of the Response/Outcome

The formal response to the complaint will be sent from the Head of the Disciplinary committee of the *IACST* to the person who made the complaint and copied to the relevant association member if appropriate. The response will include recommendations for dealing with the complaint and any necessary amendments to the therapist's policies and/or procedures and/or risk management procedures, arising from the investigation.

The *Disciplinary committee members* may arrange a time to meet the person who made the complaint and any other relevant individuals, to discuss the complaint and the therapist's response to it. The *Disciplinary committee members* will judge if it is best for all parties to meet together or if separate meetings are more appropriate.

The person making the complaint will be notified of the progress of an investigation on an ongoing and regular basis by the Disciplinary committee in writing, by email or letter.

The person making the complaint will be immediately informed of the outcome of the complaint once it has been completed.

Stage 3: Review

If, at the conclusion of the above process, those who made a complaint are dissatisfied with the response they have received, the original complaint along with the therapist's response will be passed to the *chairperson of the IACST* who will ensure that there is a complete review of the

complaint. This review will be undertaken by a person not previously involved in the review to date

The committee chairperson of the IACST will communicate a detailed response, including any actions to be taken, to both the Therapist and the person who made the complaint, within ... working days¹.

Right of Appeal

Where after the three stages of the complaint procedure has been completed and either party are not satisfied with the finding of the IACST complaint panel either or both parties can apply to appeal the finding of the complaint panel. The IACST will appoint an independent legal representative party. This independent legal representatives findings will be binding on both parties and any and all costs arising out of any such referral will be born equally by each party regardless of the findings of the legal representative.

Recording of Complaints and Confidentiality

Records of complaints must be kept in the Complaints Records File. All information relating to complaints is to be shared only on a need-to-know basis.

Where a complaint involves a child protection concern the Child Safeguarding policy will apply.

Where a complaint involves an allegation of a breach of a person's rights (child or adult) and/ or a criminal action or behaviour the appropriate authorities must be informed.

The record of the complaint must be kept for at least two years from the date on which the complaint has been dealt with. *[This period may vary depending on other legal requirements.]*

The record is to include:

- The name of the complainant
- The nature and details of the complaint
- The date and time the complaint was received
- The manner in which the complaint was received
- The name of the person who received the complaint
- The level of risk to the child or children arising from the subject of the complaint
- The manner in which the complaint was dealt with, including:
 - Any local resolution implemented
 - Any specific meetings held with the person making the complaint and minutes of any such meetings
 - Timelines for investigation of the complaint and notification of the outcome to the person making the complaint
- Details of the investigation carried out
- The outcome of the investigation
- Details of any corrective or preventive actions to resolve the complaint
- Information given to the person making the complaint about the progress and the outcome of the complaint
- of the investigation and whether the action taken to resolve the complaint was accepted.
- Details of any review to the risk management process in light of the complaint.
- Details of any changes to practice or policy.

¹ Please note: This timeframe may be different depending on the severity of the complaint, the urgency of the complaint, its complexity, and the availability of all those people who need to be involved.

All records of complaints must be kept in full compliance with the Child Care Act 1991(Early Years Services) Regulations 2016, Data Protection Act 2018 and Freedom of Information Act 2014.

Only members of the IACST committee and the Disciplinary committee can with authorisation of the chairperson can access the Complaints Records File.

5. Communication Plan [For association members and clients]

All clients are to be informed of the policy and procedures regarding Comments and Complaints on the therapists intake form. Association members will check with clients that they have read and understood the policy and provide any assistance needed.

This policy will also be reviewed annually by the therapist providing it. When a complaint is received, the person making the complaint will be given a copy of this Policy and Procedures.

A copy of the IACST policy will be available in the members section of the IACST website.

Clients of members of the IACST may receive a copy of the policy at any time upon request.

Members of the association will receive written notification of any updates or amendments to this policy or procedure.

6. Related Policies, Procedures and Forms [List of all related documents]

- Staff Training Policy**
- Confidentiality/Information Sharing Policy
- Records and Record Keeping Policy
- Grievance and Discipline Policy and Procedures
- Child Protection Policy and Procedures/ safeguarding policy
- Communication Policy
- Partnership with Parents Policy
- Comments and Complaints Form (*see sample form attached*)

7. References/Supporting Documents/Related Legislation [List of any relevant Legislation and Practice Guides referred to in drafting the Policy]

- [Data Protection Act 2018](#)

8. Who Must Observe This Policy

This policy must be observed by all members of the IACST. Where a member does not comply with any requests for information to aid with any complaint or comment made by a client the IACST will continue with the complaint process as outlined and the findings and any disciplinary action deemed necessary will be binding on the said member whether or not they have assisted in the review of the complaint.

9. Actions to be Followed if the Policy is not Implemented

[Add in any relevant actions to be taken]

Date:

10. Contact Information *[Who to contact for more information]*

If you need more information about this policy, contact:

Name	
Phone number or email	

11. Policy Created

Date this policy was created	
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12. Signatures

	Name and position	Signature
Approved by		
Approved by		

13. Review Date

Date this policy will be reviewed	
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Appendix A

Complaints Form

Please complete all sections of this form using block letters.

Name of person making complaint:

Address:

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Phone number:

Date & time complaint was first made:

Date & time of incident:

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Name of person to whom complaint was first made:

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Name of Registered Provider:

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Details of Complaint:

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Please continue on an additional sheet if required

Signature:

Date:

Please return to: *IACST* at _____ or at *info@iacst.ie*

Read by Chairperson

Signature: Date:

