



Psychodynamic Interpersonal Therapy

PIT - UK

Complaints Policy

Purpose of this document

This document sets out the way that PIT-UK Ltd (trading as PIT-UK) will respond to, investigate and resolve complaints from any of our clients about our conduct or our services. The term 'Client' includes anyone to whom we provide a service; introductory and practitioner course trainees, CPD attendees, those commissioning projects; those streaming our films.

Complaints arising from any of these aspects of PIT-UK's activities can be considered by PIT-UK but PIT-UK does not have the authority to make judgments about clinical practice of any individual or group of individuals. Any matters amounting to professional misconduct should be redirected to the appropriate professional or registering body of the relevant member(s), and / or employer.

Definition of a complaint

A complaint is defined as an expression of dissatisfaction about an act, omission or decision, either verbal or written, and, whether justified or not, requires a response. The definition is deliberately broad but an alleged complaint does not necessarily lead to a full investigation after initial scrutiny the complaint does not fall under the role of PIT-UK or or there is not considered to be a *prima facie* case to be answered.

We actively seek and welcome all feedback, positive or negative, about our services and our conduct, and not all negative feedback would either require a formal response or for this complaints procedure to be followed. If it is not clear, we will check with the person giving feedback whether they wish to make a formal complaint.

Resolutions of Complaints and Sanctions

Complaints will usually come to the attention of PIT-UK by letter or email (although exceptionally a complaint may arise from verbal discussion with an Officer, Trainer, Supervisor or other {Executive Committee member) and the Officers will decide to ask a workstream lead to investigate further. If the complaint refers to that workstream lead it will either be referred to another member of the workstream or escalated at the discretion of the Officers

PIT-UK has three options for resolution of complaints.

The first option is through a decision that the matter falls outside PIT-UK's remit with explicit advice as to where remedy can be sought.

The second option allows a proposed outcome in the form of an acknowledgment, apology or agreed actions to resolve the complaint. The complainant still has the right to request that the complaint is escalated further if they remain dissatisfied.

The third option is escalation to Executive Committee level when it has not been possible to resolve the matter to mutual satisfaction within the workstream.

The Executive Committee has the additional sanctions of a) an apology on behalf of the Organisation (along with appropriate offer of remedy where appropriate) or exceptionally by recommending the removal of the member from PIT-UK. The Member then has the right of appeal against that decision which would be heard by a separate panel constituted from other Committee members, with the option of additional legal advice on fairness of process at the discretion of the Committee, or the Officers may seek the advice of an outside expert on matters outside its competence.

Statement of intent

We understand that if a complaint is made, it is a signal that something has gone wrong and we welcome and learn from such feedback. At every level of response, the aim is to help the aggrieved person resolve the difficulty in a way that satisfies them and is also fair and just.

Part of the process of dealing with complaints is for the organisation to learn from them, and rectify problems.

The Executive Committee will receive an annual summary covering complaints received, to evidence that any lessons learned have been actioned and monitored.

Member's accountability

Every full Member is a qualified professional, who has agreed to practise in line with the ethical codes of their core profession and to abide by the governing rules and expectations of PIT-UK. Each Member is accountable for their own practice standards. If an individual Member receives a complaint concerning any PIT-UK role, they should try to resolve it but must also make it clear to the complainant that if they are not satisfied their complaint will be passed on to PIT-UK to resolve.

Members should also make it clear to clients their right to lodge a formal complaint with the Member's professional body.

However, if the relationship between the Member and the complainant has broken down, it is likely that they will not complain directly to the Member but would contact PIT-UK directly.

Associate Member's accountability

It is unlikely that a complaint would be made against an Associate member that would not be referred elsewhere as Associate Members do not normally act or provide services on behalf of PIT-UK. Exceptionally, where an Associate Member has a responsible role within PIT-UK, the Executive Committee may decide to hear the complaint using the same process as would apply to a Member.

Course Members, Trainees and attenders of PIT-UK courses.

Complaints against a course member:

In this case the complaint is likely to be of a clinical or professional nature and would be referred to the organisation providing the setting for the therapy, and / or the individual's professional body.

Complaints by a potential or actual course member about an individual trainer:

Where the complaint relates to the provision of PIT-UK trainings, the complaint will be dealt with initially by the Education and training workstream lead or, where there is a conflict of interest, by another trainer member of the workstream, referring to the provisions and limitations stated in the *Resolutions of complaints* paragraph above.

Where the complaint is regarding the workstream lead, the matter will be investigated by an officer from another workstream, after consultation with the executive committee.

Complaints about a course rather than an individual trainer:

The Introductory and Practitioner Courses are special cases in that a number of people may be involved in the training of an individual and the complaint may not be about an individual trainer. If a complaint is lodged about any of these matters, it is the responsibility of the workstream lead of the Training and Education workstream to take responsibility for initially investigating the complaint.

Safeguarding issues

Exceptionally, if any safeguarding issue arises out of the investigation the matter would be discussed with the relevant local safeguarding lead within the appropriate local authority or, where relevant, NHS Trust.

Workstream accountability

There are seven workstreams: Education and Training, CPD, Research, External Relations, Finance and Membership. It is possible that the workstream lead is first made aware of a complaint about a Member. The workstream lead must inform the PIT-UK Executive Committee that a complaint has been received. If a client contacts the PIT-UK Chair or any Executive Committee member, it will be first referred to the workstream lead to resolve. If the issue is not resolved within the workstream, the Executive Committee will then convene a more formal investigation.

Workstream may have contributors who are not PIT-UK Members, for example external CPD presenters who contribute to the work of PIT-UK. If a complaint is lodged about any of these, it is the responsibility of the workstream lead with the Executive Committee to take responsibility for investigating the complaint.

Actions to be taken where the Member is found to have acted to bring PIT-UK into disrepute

Exceptionally, the decision may be that the individual should cease to be a member of PIT-UK (or as a lesser sanction, the individual should not be used again by PIT-UK as a trainer) following the complaint and in that case the individual will be informed about the decision and why it was made.

The individual then has the right of appeal against that decision which would be heard by a separate panel constituted from the Executive Committee members, with the option of additional legal advice on fairness of process at the discretion of the Executive Committee.

Executive Committee accountability

In the case of a complaint about a Member, the Executive Committee will convene a panel of three members who are independent of the workstream and the Member involved. The panel will take evidence from the complainant and the Member and will attempt to resolve the complaint, giving a written response; this will be communicated to the Complainant, the Member and the Executive Committee. If the panel feels there is an issue of *malpractice* or *unethical behaviour*, this must immediately proceed to the Executive Committee for a second stage hearing and a final decision. The second stage may also be invoked if the complainant or the Member appeals against the initial decision.

The Executive Committee will have oversight of each stage of the complaint procedure and will consider cases referred from the workstream leads or through appeal. A panel of three Executive Committee members will investigate the complaint in a stage 2 hearing, and make a recommendation to the Executive Committee as a whole. If it is not possible to find three members to serve on the panel (for example, due to temporary absence or lack of independence) the Chair may appoint an independent, external person to act in this capacity.

The PIT-UK Executive Committee is the body constituted in PIT-UK to decide on a final response, e.g. whether to remove an Member, or other individual working with PIT-UK, from PIT-UK, or to report any Member or other individual to their professional body.

[Notwithstanding the above, this paragraph does not preclude *any* individual reporting serious concerns to a professional body in their own right].

Conflicts of interest

If a member of the Executive Committee is the subject of a complaint, they will be excluded from the management of the complaint and any discussion arising. All PIT-UK Members including Executive Committee or Board members who are asked to investigate a complaint are required to declare any other conflict of interest (e.g. a close personal friendship) and to recuse themselves.

Appeals

Complaints which are not satisfactorily resolved within a workstream are automatically referred to the Executive Committee. A complainant or Member who is unsatisfied by the Executive Committee's judgement may appeal the decision, which will then go to an External Advisor appointed by the Chair of PIT-UK for the next stage of the process. The External Advisor will comment to the Executive Committee which will formally reconsider its decision and minute the reasons why the advise was or was not accepted. That decision is final. Complainants are always

informed of their right to complain to a Member's registration body and nothing in this policy affects that.

Reporting

Numbers of complaints received and the actions taken will be reported at the PIT-UK AGM, together with any lessons learned. All personal details will be anonymised.

Summary of process

Stage 1

Workstreams inform the Executive of a complaint being processed, and if resolved, report back with no further action required. These matters are collated for the annual report on complaints. Normally a complaint is managed at this level within one calendar month.

Stage 2

Executive Committee action at Stage 2 is taken when a workstream is unable to resolve the complaint to mutual satisfaction. A formal panel of Executive Committee members is then constituted, and the Officers oversee its work to ensure that there is no undue delay in resolving the matter. Normally a complaint is managed at this level *within two further calendar months*.

The Stage 2 Panel normally has three members and will include Executive Committee members not previously involved. The Stage 2 panel Chair is empowered to seek further advice as needed and reasonable costs for seeking external advice where needed and can appoint an external person such as a senior professional from another organisation.

Stage 3

If the complaint can still not be resolved the matter can be closed unresolved at the decision of the Officers and Executive Committee.

Alternately the Officers and Executive Committee can decide to move to a full Stage 3 review. This involves an external person appointed by the Chair appointing a senior external professional to review the papers and advise the Executive Committee. The advice may be to refer the complaint externally to a professional body (if relevant); to accept the complaint as supported and to suggest restitution or to close the complaint.

The Executive Committee will then minute its decision and the reasons for accepting or not accepting the advice of the external reviewer.

- Nothing in this process shall be taken to prevent the complainant seeking other appropriate forms of legal redress or for the member complained about to be referred to the appropriate professional or registration body.
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