

Kensington
Square
Therapy

Kensington Square Therapy Ltd

Complaints Procedure

Version: 1.0

Policy Owner: Sam McManus (Director)

Approved by: Sam McManus, Director

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Review Cycle: Annual or sooner if statutory guidance changes

Controlled Document

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1. Purpose

This procedure sets out how Kensington Square Therapy Ltd (“KST”) receives, investigates, and resolves complaints from clients, parents, carers, school partners, and other stakeholders.

KST is committed to providing a fair, transparent, and accessible complaints process. Complaints are valued as an opportunity to improve the quality and safety of services.

This procedure supports KST’s obligations under applicable professional ethical frameworks (BACP, NCPS), contractual commitments to partner schools, and regulatory expectations.

2. Scope

This procedure applies to all complaints relating to services provided by or on behalf of KST, including:

- Individual therapy and counselling (private practice and school-based).
- Group programmes and facilitator-led services.
- Online and remote provision.
- Parent consultations.
- Administrative, financial, or contractual matters.
- Data protection and confidentiality concerns.
- Conduct of KST personnel, including subcontracted therapists and facilitators.

This procedure does not apply to safeguarding concerns, which must be reported immediately through the KST Safeguarding Policy. If a complaint includes a safeguarding element, the safeguarding element will be prioritised and handled under the Safeguarding Policy before the complaint is progressed.

3. Definitions

Complaint: An expression of dissatisfaction about any aspect of KST’s services, conduct, or administration, made by or on behalf of a client, parent, carer, school, or other stakeholder, which requires a formal response.

Complainant: The person making the complaint.

Informal Resolution: An attempt to resolve a concern through direct discussion without invoking the formal complaints procedure.

Formal Complaint: A complaint submitted in writing (or recorded in writing following a verbal complaint) that is processed through the staged procedure set out in this document.

Independent Review: An external review of a complaint by an independent professional who has no prior involvement with KST or the complainant.

Complaint Record: The KST Complaint Record Form (KST-ComplaintRecord-v1.0-2026) used to document the complaint lifecycle.

4. Legal and Regulatory Framework

This procedure operates within the following legal and regulatory framework:

- BACP Ethical Framework for the Counselling Professions (Good Practice in Action resources on complaints).
- NCPS Code of Ethics and Complaints Procedure.
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018.
- Consumer Rights Act 2015.
- Equality Act 2010.
- Children Act 1989 and Children Act 2004.
- Working Together to Safeguard Children 2023.
- Keeping Children Safe in Education 2024 (DfE).

Where KST operates within a school setting, this procedure also operates alongside the host school's own complaints policy. Complaints received by the school about KST services will be addressed by KST through this procedure, with the school kept informed as appropriate.

5. Roles and Responsibilities

KST Director (Sam McManus)

- Overall accountability for the complaints process.
- Receives and investigates all formal complaints.
- Determines outcome and communicates the response to the complainant.
- Commissions independent review where required.
- Maintains the complaints register and reports on trends.

Subcontracted Therapists and Facilitators

- Report any complaint or expression of dissatisfaction received during service delivery to the Director within one working day.
- Cooperate with any investigation.
- Do not attempt to resolve formal complaints independently without the Director's knowledge.

School Designated Safeguarding Lead / School Contact

- May receive initial complaints from parents within the school setting and forward to KST.
- Kept informed of progress and outcome where the complaint relates to school-based provision, subject to confidentiality considerations.

6. Operational Procedure

6.1 How to Make a Complaint

Complaints may be submitted by:

- Email: contact@kst.ltd
- Letter: Kensington Square Therapy Ltd, 23 Kensington Square, London W8 5HN.
- Verbally to the Director or a KST therapist (the complaint will be recorded in writing and confirmed with the complainant).

Complaints should include: the complainant's name and contact details, the nature of the complaint with as much detail as possible, the date(s) of the event(s) giving rise to the complaint, the name of the KST personnel involved (if known), and the outcome the complainant is seeking.

Complaints should be raised within six months of the event giving rise to the concern, unless there are exceptional circumstances. Late complaints will be considered at the Director's discretion.

6.2 Stage 1 - Informal Resolution

Where appropriate, KST will attempt to resolve the concern informally through direct discussion between the complainant and the Director (or, where the complaint relates to administrative matters, the relevant personnel).

Informal resolution may include an explanation, apology, correction of error, or agreement on a practical remedy.

If the complainant is satisfied with the informal resolution, the matter will be recorded briefly in the complaints register and closed. If the complainant is not satisfied, or if the nature of the complaint is too serious for informal resolution, the matter will proceed to Stage 2.

6.3 Stage 2 - Formal Investigation

Upon receipt of a formal complaint (or escalation from Stage 1), the Director will:

1. Acknowledge receipt of the complaint in writing within three working days.
2. Open a Complaint Record (KST-ComplaintRecord-v1.0-2026).
3. Investigate the complaint. This may include reviewing records, speaking with the complainant, interviewing the relevant KST personnel, and consulting supervision notes or school contacts as appropriate.
4. Where the complaint relates to the Director's own conduct, arrangements will be made for the investigation to be conducted by an independent person.
5. Provide a written response to the complainant within 20 working days of acknowledgement, setting out: (a) a summary of the complaint, (b) the steps taken to investigate, (c) the findings, (d) the outcome (upheld, partially upheld, or not upheld), (e) any remedial action to be taken, and (f) the right to escalate to Stage 3 if dissatisfied.

If the investigation requires more than 20 working days, the Director will write to the complainant to explain the delay and provide a revised timeline.

6.4 Stage 3 - Independent Review

If the complainant remains dissatisfied following the Stage 2 response, they may request an independent review in writing within 20 working days of receiving the Stage 2 outcome.

The Director will appoint an independent reviewer. This will be a suitably qualified professional with no prior involvement with KST or the complainant. The cost of the independent review will be borne by KST.

The independent reviewer will:

- Review the complaint record, the Stage 2 investigation, and the Director's response.
- Invite written submissions from the complainant.
- May request further information from KST or third parties.
- Provide a written report to the Director and the complainant within 30 working days of appointment, including findings and recommendations.

The Director will consider the independent reviewer's recommendations and communicate the final outcome to the complainant within 10 working days of receiving the report. This constitutes the final stage of KST's internal complaints process.

6.5 External Escalation

If the complainant remains dissatisfied after the completion of KST's internal complaints procedure, they may escalate the matter to the following external bodies:

- Professional body complaint: If the therapist is a member of BACP, NCPS, or another professional body, the complainant may make a complaint directly to that body.
- Information Commissioner's Office (ICO): For complaints relating to data protection or privacy (ico.org.uk).
- Local Authority: For safeguarding concerns (via the relevant local authority children's services).
- Ofsted: Where services are provided within a school setting regulated by Ofsted.

KST will cooperate fully with any external investigation.

6.6 Complaints Involving Safeguarding

If a complaint raises a safeguarding concern relating to a child, young person, or adult at risk, the safeguarding concern takes precedence. The Director (as Designated Safeguarding Lead) will:

6. Assess whether the safeguarding concern requires immediate referral to the local authority or emergency services.
7. Handle the safeguarding element under the KST Safeguarding Policy.
8. Inform the complainant that the safeguarding element has been separated and will be handled under the Safeguarding Policy.
9. Progress the non-safeguarding elements of the complaint through this Complaints Procedure once the safeguarding matter has been addressed.

6.7 Unreasonable or Vexatious Complaints

KST recognises that making a complaint can be stressful and will treat all complainants with courtesy and respect. However, where a complaint is assessed by the Director as vexatious, persistently repeated without new evidence, or pursued in a manner that is abusive, threatening, or unreasonably demanding of KST resources, the Director may:

- Inform the complainant in writing that the complaint has been fully addressed and that no further correspondence will be entered into on the matter.
- Restrict the channels through which the complainant may contact KST.

Any such decision will be recorded with reasons in the complaints register.

7. Safeguarding Considerations

Complaints may be made by or on behalf of children and young people. KST will consider the safeguarding implications of every complaint, regardless of how it is categorised.

Where a child or young person wishes to make a complaint directly, KST will provide age-appropriate support and consider whether an advocate should be involved.

Information shared during the complaints process will be handled in accordance with the KST Confidentiality Policy and Safeguarding Policy. Safeguarding concerns identified during a complaints investigation will be escalated immediately, regardless of the stage of the complaint.

8. Data Protection Considerations

Personal data processed during the complaints procedure is handled in accordance with UK GDPR and the Data Protection Act 2018. The lawful basis for processing is legitimate interest (Article 6(1)(f)) for the purpose of responding to and resolving complaints, and legal obligation (Article 6(1)(c)) where the complaint engages regulatory or statutory duties.

Complaint records are stored securely within Google Workspace with access restricted to the Director. Records are retained for six years from the date the complaint is closed, in line with the Limitation Act 1980 and KST's Retention Schedule.

Complainants have the right to request access to their complaint record under UK GDPR. Such requests will be handled under the KST DSAR Procedure.

Where a complaint involves a third party (e.g. a therapist), care will be taken to balance the rights of all parties and to redact third-party personal data where disclosure would be inappropriate.

9. Risk Management

Risk	Mitigation	Likelihood	Impact
Complaint not acknowledged within three working days	Complaints register monitored by Director; acknowledgement template maintained	Low	Medium
Investigation exceeds 20-working-day target	Progress update sent to complainant; revised timeline agreed; complaints register tracks deadlines	Medium	Medium
Complaint contains safeguarding concern not identified	All complaints screened for safeguarding at point of receipt; DSL training	Low	High
Complainant dissatisfied with outcome and escalates externally	Three-stage procedure with independent review reduces risk; lessons learned applied	Low	High
Complaint against Director with no independent oversight	Stage 2 requires independent investigation where Director is the subject	Low	High
Complaint records not retained securely	Google Workspace access controls; retention schedule enforced; annual audit	Low	High

10. Record Keeping

- **Complaint Record Forms:** Each formal complaint is documented using KST-ComplaintRecord-v1.0-2026, recording the complaint details, investigation, outcome, and lessons learned.
- **Complaints Register:** A central log of all complaints (informal and formal) recording date received, category, setting, outcome, and date closed. Maintained by the Director.
- **Independent Review Reports:** Retained alongside the relevant complaint record.
- **Correspondence:** All written correspondence with the complainant is retained with the complaint record.

All complaint records are stored securely within Google Workspace with access restricted to the Director. Records are retained for six years from the date of closure.

11. Training Requirements

- **Director:** Complaints handling, investigation skills, safeguarding interface, data protection in complaints. Reviewed annually.
- **Subcontracted Therapists and Facilitators:** Awareness of KST complaints procedure, duty to report expressions of dissatisfaction, and boundaries of their role in complaints. Covered at induction and reviewed annually.

Training completion is recorded in the KST Training Log maintained within Google Workspace.

12. Monitoring and Audit

- **Annual complaints review:** The Director reviews all complaints received during the year, analyses trends by category and setting, identifies lessons learned, and produces a summary report.
- **Compliance monitoring:** Adherence to acknowledgement and response timescales is tracked through the complaints register.
- **Lessons learned:** Each upheld or partially upheld complaint generates a recorded lesson learned and, where appropriate, a policy or procedural amendment.
- **School reporting:** Where required by the school service agreement, anonymised complaint summaries are included in governance reports to partner schools.

13. Review Cycle

This procedure will be reviewed annually or sooner if:

- Statutory or regulatory guidance changes.
- A significant complaint or pattern of complaints identifies a need for revision.
- The annual complaints review identifies procedural weaknesses.
- A professional body or insurer requires amendment.
- Organisational changes (e.g. new service settings, new subcontractors) require it.

14. Related Policies

- KST Safeguarding Policy
- KST Confidentiality Policy
- KST Data Protection Policy (v1.0-2025)
- KST Privacy Notice (v1.0-2025)
- KST DSAR Procedure (v1.0-2026)
- KST Complaint Record Form (v1.0-2026)
- KST Consent Form (v1.0-2026)
- KST Data Breach Response Plan (v1.0-2026)

15. Governance Maturity Assessment

Current Maturity Level	Level 3 – Robust and Defensible
Target Maturity Level	Level 4 – Audit Ready
Actions to Reach Target	Implement complaints register with automated

	deadline tracking; integrate annual complaints review into governance calendar; document independent reviewer panel
12-Month Strengthening Target	Achieve Level 4 through evidenced complaints register, annual trend analysis report, and documented independent review arrangements

16. Version Control

Version	Author	Approved By	Date Issued	Review Date	Summary of Changes
1.0	Sam McManus	Sam McManus	February 2026	February 2027	Initial release

End of Policy

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