



COSCA (Counselling and Psychotherapy in Scotland)  
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## COSCA's Standards for Complaints Procedures

In the interests of public protection, COSCA sets standards for the complaints procedures of member organisations, members and individual members who have their own complaints procedure.

COSCA requires that the complaints procedures of the above members meet these standards and that their procedures focus throughout on the interests and protection of service users and the public.

The standards will be used by COSCA to review the complaints procedures of the above members at the point of membership application and as part of COSCA's annual audit of member organisations and individual members.

If you are required to submit this document to COSCA for audit purposes, etc., please ensure that it is completed and where possible cross referenced.

COSCA recommend that complainants are first offered an informal process (with a record kept of contact and outcomes) before progressing onto the formal procedure; for example, complainants are encouraged to speak informally to their counsellor/ counselling skills worker or a manager before starting the formal complaints process.

To meet COSCA's standards, a complaints procedure needs to state that:

| Standard Number<br><i>(please tick)</i> | Your Cross Referencing information | Standards for Complaints Procedures   |
|---|------------------------------------|---|
| 1.                                      |                                    | the public know how and are able to access the complaints procedure in hard copy or electronically, including the member's website (if they have one) |
| 2.                                      |                                    | those who receive counselling related services, including training and supervision, are informed on how to find COSCA's Complaints procedure          |
| 3.                                      |                                    | if possible, it will be made available in other languages and formats on request  |
| 4.                                      |                                    | it covers complaints against:<br>a) members of staff,   |

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|     |  | <ul style="list-style-type: none"> <li>b) individuals (paid and volunteer)</li> <li>c) and groups carrying out work related to counselling and psychotherapy on behalf of the member</li> </ul>   |
| 5.  |  | <ul style="list-style-type: none"> <li>a) complaints will or will not be acceptable by defined third parties</li> <li>b) and/or representatives</li> <li>c) and, if acceptable, in what circumstances</li> </ul>  |
| 6.  |  | <ul style="list-style-type: none"> <li>a) there is a process for anonymous complaints</li> <li>b) and how possible limitations might be addressed</li> </ul>  |
| 7.  |  | a time limit is given for complaints to be accepted and investigated e.g. a maximum of three years following the date of when the alleged breach of COSCA's Statement of Ethics and Code of Practice took place   |
| 8.  |  | the full contact details are provided for complainants to use in the procedure (name or post, address, telephone number, email address)   |
| 9.  |  | that the complainant knows how to make a complaint, either by letter, email, and/or proforma  |
| 10. |  | appropriate alternative means are offered by you/ your organisation to complainants who are unable to submit complaints in writing  |
| 11. |  | <ul style="list-style-type: none"> <li>a) assistance and advice is offered by you/ your organisation to complainants to enable them to understand the complaints procedure,</li> <li>b) you/ your organisation are able to signpost them to external support from organisations such as local advocacy services</li> </ul>  |
| 12. |  | a responsible individual is identified, by name or post, to manage (not investigate) the complaints procedure e.g service manager   |
| 13. |  | <ul style="list-style-type: none"> <li>a) impartial investigator(s) independent of the complainant and person complained against, or an independent and impartial complaints panel, will be appointed to investigate</li> <li>b) consideration should be taken as to whether managers or boards are able to impartially investigate a complaint</li> <li>c) COSCA recommend that more than one person is chosen to investigate</li> </ul> |
| 14. |  | that the investigator(s) and/ or complaints panel will act confidentially in their handling of the complaint  |
| 15. |  | the responsible individual identified to manage the complaints procedure can halt the complaint at any stage should it emerge that legal action is under way, pending or intended, until any legal process is complete  |
| 16. |  | complaints will be acknowledged and the complainant informed how and when they will be dealt with e.g. within 21 working days   |

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| 17. |  | <p>you/ your organisation will</p> <ol style="list-style-type: none"> <li>communicate with the complainant and those complained against about the progress of the investigation</li> <li>and in what way e.g. in writing, by telephone, by email</li> </ol>   |
| 18. |  | <p>all parties involved in the complaint will, if it arises, declare a conflict of interest to a specific person or postholder</p>  |
| 19. |  | <p>the complainant and the complained against, and/ or their representative, will not come into contact at any time as a result of the investigation</p>  |
| 20. |  | <p>that the complained against and the complainant have</p> <ol style="list-style-type: none"> <li>the right to attend the complaints panel meeting and</li> <li>be accompanied and/ or represented by a supportive person of their choice</li> </ol>   |
| 21. |  | <ol style="list-style-type: none"> <li>the periods of time for each stage of the investigation are clearly shown,</li> <li>as are the time limits for appeals to be accepted and completed</li> </ol>   |
| 22. |  | <p>the maximum amount of time for the complaint to be investigated is known e.g. six months</p>   |
| 23. |  | <ol style="list-style-type: none"> <li>there will be examples of possible sanctions that can be applied</li> <li>how, and by whom, any sanctions imposed will be monitored</li> <li>and how their commencement and completion will be communicated to both the complainant and complained against</li> </ol>  |
| 24. |  | <ol style="list-style-type: none"> <li>there is an Appeals Procedure against the decisions made under the Complaints Procedure</li> <li>and the Appeals Procedure is accessible to all parties and included in the Complaints Procedure</li> <li>it is clear under what circumstances an appeal will be heard</li> </ol>  |
| 25. |  | <p>Once the member's complaints procedure has been exhausted, complainants:</p> <ol style="list-style-type: none"> <li>are advised by you/ your organisation that they can submit a complaint to COSCA, under its Complaints Procedure, within one month of the above exhaustion,</li> <li>are given COSCA's full contact details (address, telephone number, email address)</li> </ol> <p>COSCA will verify that the members' procedure has been followed and the outcome was lawful, reasonable and properly explained (see 1.22 in COSCA's complaints procedure)</p> |
| 26. |  | <p>the <b><i>Outcome Report to COSCA at the Conclusion of Complaints Proceedings</i></b> (found at <a href="http://www.cosca.org.uk">www.cosca.org.uk</a> under Complaints) will be submitted to COSCA, immediately or within one month of the conclusion of your/ your organisation's complaints process</p>   |

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| 27. |  | where the organisation and/ or individual member has a Website the Complaints Procedure <b>must</b> be referenced and the following Standards (see above) must be included: 1, 21, 25, 26. |
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Brian Magee, Chief Executive, COSCA (Counselling & Psychotherapy in Scotland)