FLOURISH WITH NEURODIVERSITY LTD

Complaints Policy

A clear and accessible process for raising concerns about services, counselling and hypnotherapy practice, safeguarding and personal data.

Policy owner	Natasha Wakeling, Director and Business Owner
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Approved by	Natasha Wakeling
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Applies to	All Flourish services, including counselling and hypnotherapy delivered by freelance associates

Important: A complaint that indicates immediate risk, abuse, neglect, serious harm, a data breach or possible criminal conduct will be managed under the relevant safeguarding, incident, data-breach or emergency procedure without waiting for the ordinary complaints process to finish.

Flourish With Neurodiversity Ltd | Company No. 17483908 | Registered office: Lytchett House, 13 Freeland Park, Wareham Road, Poole, Dorset, BH16 6FA | Registered in England and Wales

Contents

1. Introduction and purpose

2. Scope and who may complain

3. Our commitments

4. Definitions and complaint categories

5. How complaints are triaged

6. Stage 1 - informal resolution

7. Stage 2 - formal complaint

8. Complaints about counselling and professional practice

9. Complaints about hypnotherapy and professional practice

10. Safeguarding concerns raised through a complaint

11. Data-protection complaints

12. Stage 3 - external routes after or alongside local resolution

13. Complaints involving associates, subcontractors or third parties

14. Reasonable adjustments and communication support

15. Confidentiality, records and information sharing

16. Outcomes, remedies and learning

17. Unreasonable or persistent behaviour

18. Monitoring, escalation and insurance

19. Policy monitoring and review

Appendix 1 - Complaint information checklist

1. Introduction and purpose

Flourish with Neurodiversity is committed to providing high-quality, professional, safe and neurodiversity-affirming services. We hope concerns can usually be resolved through open communication, but we recognise that people must have a clear, fair and accessible way to raise dissatisfaction or report something that has gone wrong.

This policy explains how Flourish will receive, assess, investigate and respond to complaints. It has been updated to reflect the introduction of counselling and hypnotherapy services delivered by freelance practitioners and to distinguish between service complaints, counselling or hypnotherapy professional-practice complaints, safeguarding concerns and data-protection complaints.

Complaints and feedback are used to put matters right where possible, reduce risk, improve services and support accountable professional practice. Making a complaint will not result in a person being

treated unfairly or disadvantaged in accessing an appropriate service.

2. Scope and who may complain

This policy applies to all Flourish services and activities, including coaching, assessments, training, groups, membership services, administrative support, counselling and hypnotherapy delivered on behalf of Flourish by employees, freelance associates or subcontractors.

A complaint may be made by:

- a current or former client;
- a parent, carer or person with parental responsibility;
- an authorised advocate or representative;
- a person attending a group, event or training session;
- a purchaser, commissioner, employer, school, organisation or other stakeholder; or
- another person who has directly witnessed or been affected by the matter.

Where a complaint is made on behalf of another adult, Flourish will normally seek that person’s consent before sharing confidential information. This may not be required where the person lacks capacity, there is an overriding safeguarding concern, or disclosure is otherwise permitted or required by law.

3. Our commitments

- take concerns seriously and respond respectfully;
- provide reasonable adjustments and more than one way to communicate;
- identify the correct complaint route promptly;
- avoid conflicts of interest and seek independent professional input where appropriate;
- keep complainants informed where an investigation takes longer than expected;
- protect confidentiality while sharing information where necessary for safety, investigation, insurance or legal obligations;
- not require a person to confront the practitioner they are complaining about; and
- record outcomes and learning without using complaints as a substitute for safeguarding, disciplinary, data-breach or professional-conduct processes.

4. Definitions and complaint categories

A complaint is an expression of dissatisfaction about an act, omission, decision, standard of service or professional conduct that requires a response. A complainant is the person making the complaint, whether for themselves or on behalf of another person.

Category	Examples	Primary route
Service or administrative complaint	Booking, communication, delays, billing, access, conduct outside therapeutic work, service information, cancellations or failure to follow an agreed process.	Flourish complaints procedure.
Counselling or professional-practice complaint	Therapeutic boundaries, competence, contracting, confidentiality within counselling, record keeping, endings, the counsellor's conduct, or concerns about professional or ethical practice.	Flourish procedure, with clinically informed review where needed; BACP route may also be available.
Hypnotherapy or professional-practice complaint	Suitability screening, informed consent, therapeutic boundaries, safety, inappropriate suggestions or techniques, adverse reactions, competence, confidentiality, records, endings or the hypnotherapist's conduct.	Flourish procedure with independent hypnotherapy-informed advice where required; relevant professional body or insurer where applicable.
Safeguarding concern	Abuse, neglect, exploitation, coercion, immediate danger, risk to a child or adult at risk, serious self-harm or risk to others.	Safeguarding procedure immediately; complaint can continue in parallel where appropriate.
Data-protection complaint	Use, access, loss, disclosure, accuracy, retention or security of personal data; delay or concern about an information-rights request.	Dedicated data-protection complaint route; possible ICO escalation.
Incident or near miss	An event that caused or could have caused harm, including a confidentiality incident, unsafe practice or systems failure.	Incident/near-miss process, with complaint route in parallel if dissatisfaction also requires a response.

5. How complaints are triaged

All concerns will be reviewed at the outset by the business owner, or by another suitable person where the owner is involved in the complaint. The review will decide:

- which category or categories apply;
- whether anyone may be at immediate risk;
- whether evidence or records need to be preserved;
- whether the counsellor or another associate should pause contact with the complainant;
- whether the matter should be referred to safeguarding, the police, the ICO, an insurer, a professional body, legal advisers or another organisation;
- whether specialist or independent clinical/professional input is needed; and
- whether any part of the complaint cannot be shared because it concerns another person's

confidentiality.

A complaint may fall into more than one category. Flourish will explain which processes are being used and will coordinate them as far as possible. Safety action will not be delayed while responsibility

for the complaint is being clarified.

6. Stage 1 - informal resolution

Informal resolution may be appropriate where the concern is relatively minor, there is no indication of immediate risk or serious professional misconduct, and the complainant is comfortable with this approach. Examples include clarifying information, correcting an administrative error, apologising, rearranging support or agreeing a practical remedy.

A complainant does not have to use informal resolution. They may move directly to Stage 2, particularly where the complaint is serious, relates to counselling or hypnotherapy boundaries or professional conduct, involves safeguarding or data protection, or they do not feel safe communicating directly with the person involved.

Where the complainant confirms that the matter has been resolved, the complaint will be recorded as closed, together with any learning or action required.

7. Stage 2 - formal complaint

Formal complaints should be submitted to the business owner:

- Telephone: 07355 929709
- Email: info@flourishwithneurodiversity.com

Complaints can be made in writing, by telephone or with communication support. Flourish will not insist on a written complaint where disability, distress, communication needs or another barrier makes this difficult. A record will be made and checked with the complainant where practicable.

It is helpful to include what happened, relevant dates, who was involved, the impact, any supporting evidence and the outcome sought. Lack of documentation will not automatically prevent a complaint from being considered.

Acknowledgement and investigation

- General complaints will normally be acknowledged within five working days.
- A data-protection complaint will be acknowledged within 30 calendar days at the latest, in line with current statutory requirements, although Flourish will aim to acknowledge it sooner.
- Flourish will aim to complete a formal investigation and issue a written outcome within 30 working days.
- Where this is not possible, the complainant will be told why, what remains outstanding and when a further update can be expected.
- The investigator may review contracts, consent records, session or contact records, communications, invoices, policies, technical logs and written accounts from relevant people.
- The person complained about will normally have an opportunity to respond, but will not control the

investigation or decide the outcome.

The written outcome will summarise the issues considered, the evidence reviewed, findings on each material point, any limitations, whether the complaint is upheld, partly upheld or not upheld, actions taken or planned, and any available review or external route.

8. Complaints about counselling and professional practice

Counselling delivered through Flourish is a distinct professional service. Complaints about the content or quality of counselling, the therapeutic relationship, boundaries, competence, confidentiality, contracting, record keeping, supervision, endings or the counsellor's professional conduct will be treated as counselling or professional-practice complaints rather than being assessed only as customer-service issues.

Counselling may be delivered by a freelance associate and they remain individually accountable for their professional practice, and are expected to practice in accordance with the BACP Ethical Framework for the Counselling Professions, their competence, supervision arrangements, insurance and the terms of their agreement with Flourish.

Flourish will manage the local complaint. The counsellor may be required to provide relevant records and a written response, notify their clinical supervisor and insurer where appropriate, and cooperate with review meetings. Their supervisor's role is to support safe and ethical practice; the supervisor will not automatically act as the complaint investigator or disclose confidential supervision material.

Where the complaint requires an assessment of counselling standards or clinical/professional judgement, Flourish may obtain advice from an appropriately qualified and independent counsellor, clinical consultant, safeguarding adviser, insurer or legal adviser. The business owner will not make unsupported clinical findings outside her competence.

Flourish may temporarily change, pause or end the counselling arrangement while a complaint is investigated where this is necessary for safety, welfare, confidence in the therapeutic relationship or integrity of the investigation. Appropriate signposting or transition support will be considered, but cannot always be guaranteed.

9. Complaints about hypnotherapy and professional practice

Hypnotherapy delivered through Flourish is a distinct professional service. Concerns about initial consultation, suitability assessment, informed consent, the planned approach, practitioner competence, therapeutic boundaries, use of suggestions or techniques, the client's experience during or after a session, confidentiality, records, supervision or ending of treatment will be handled as professional-practice concerns rather than only as customer-service issues.

The hypnotherapist may be a freelance associate and remains individually accountable for practising within their training, competence, professional standards, insurance and agreement with Flourish. A practitioner must not represent hypnotherapy as a substitute for necessary medical or mental-health assessment or treatment, or claim guaranteed outcomes.

Flourish will review relevant booking and initial consultation records, suitability decisions, consent and hypnotherapy agreement, session notes, communications, risk assessments and any discharge or referral records where needed and lawful. Information about a client's health or treatment will be shared only as necessary and subject to appropriate confidentiality and data-protection safeguards.

Where a complaint raises concerns about whether hypnotherapy was suitable, whether an adjustment or referral was needed, or whether the approach was professionally safe, Flourish may seek advice from a

suitably qualified independent hypnotherapy practitioner, supervisor, clinical adviser, insurer or legal adviser. The business owner will not make unsupported clinical findings outside her competence.

The practitioner must cooperate with a fair investigation, provide relevant records and a response, and notify their supervisor, professional association and professional indemnity insurer where appropriate under their applicable rules and policy terms. An independent reviewer will be used where there is a conflict of interest.

Where necessary for safety or confidence in the service, sessions may be paused, reassigned or ended while a concern is assessed. Flourish will consider appropriate signposting, transition support and any immediate safeguarding or incident-reporting obligations. Clients will not be required to discuss their complaint directly with the hypnotherapist.

10. Safeguarding concerns raised through a complaint

Where information suggests that a child, young person or adult at risk may be experiencing abuse, neglect, exploitation or serious harm, or that another person may be at immediate risk, the safeguarding procedure takes priority. The concern will be referred immediately to the Designated Safeguarding Lead or suitable safeguarding contact and, where required, to statutory services or the police.

Flourish may need to share relevant information without consent where this is necessary and lawful to protect someone from serious harm, meet a legal duty or support a statutory safeguarding response. The complainant will be told about information sharing where it is safe and appropriate to do so.

A safeguarding decision is not delayed until a complaint investigation is complete. The complaint may continue alongside the safeguarding process, be narrowed to avoid prejudice, or be paused where requested by a statutory agency. Flourish will record the rationale for these decisions.

This policy is not an emergency service. In an immediate emergency, call 999 or attend the nearest Accident and Emergency department.

11. Data-protection complaints

A data-protection complaint includes dissatisfaction about how Flourish or a person working on its behalf has collected, used, stored, accessed, shared, secured, corrected, retained or deleted personal data, or handled an information-rights request. It may also identify a suspected personal-data breach.

Data-protection complaints can be sent using the contact details in section 7 and should be marked “Data Protection Complaint” where possible. Flourish will provide a clear route to complain, acknowledge the complaint within 30 calendar days at the latest, take appropriate steps to investigate without undue delay, keep the complainant informed where necessary and communicate the outcome.

Where a complaint reveals a suspected personal-data breach, Flourish will also use its data-breach procedure to contain the incident, assess risk, preserve evidence and decide whether notification to the Information Commissioner’s Office (ICO) and affected individuals is required. The data-breach assessment is separate from deciding whether the complaint is upheld.

The response will explain any action taken and the complainant’s right to raise the matter with the ICO. Flourish may not be able to provide information that would disclose another person’s data, compromise security or breach a legal duty of confidence.

12. Stage 3 - external routes after or alongside local resolution

Where local resolution has been completed and the complainant remains dissatisfied, or where an external body permits a direct complaint, the following routes may be available. Flourish cannot determine whether an external body will accept a complaint.

BACP - complaints about counselling or professional conduct

A client or other eligible person may be able to complain to BACP about alleged poor or unethical practice by a current BACP member. BACP considers complaints under its Professional Conduct Procedure and decides whether a concern is within its remit and which route applies. Eligibility and time limits are set by BACP and may change, so complainants should check the current procedure directly.

BACP information: How to complain about a BACP member

BACP Professional Conduct team: 01455 883300 or professional_conduct@bacp.co.uk

A complaint to Flourish does not remove any right to approach BACP. Flourish may encourage local resolution where appropriate, but will not state that a complainant must complete the local process where BACP's rules allow a complaint to be made directly. Flourish will cooperate lawfully with BACP and preserve relevant records.

ICF - complaints about coaching

Where a complaint relates to coaching delivered by an International Coaching Federation member and falls within the ICF's remit, the complainant may consult the ICF Ethical Conduct Review process. The current process and eligibility requirements should be checked on the ICF website.

Hypnotherapy - professional associations and insurers

A person may also be able to raise concerns about a hypnotherapist with the professional association or accreditation body of which that practitioner is currently a member, subject to that body's current complaints and eligibility rules. Membership and complaints routes vary by practitioner; Flourish will provide the relevant membership details and signposting where known. Complaints involving potential harm, negligence or unsafe practice may also require insurer or other appropriate external advice.

ICO - data-protection complaints

A person who remains concerned about the handling of their personal data may complain to the Information Commissioner's Office. The ICO generally expects the person to have raised the concern with the organisation first, but it decides how to handle each complaint.

ICO complaint information: Make a complaint

ICO helpline: 0303 123 1113

Other routes

Depending on the subject matter, a complainant may also seek independent legal advice, contact a commissioner or funding body, use a payment provider's dispute process, report criminal conduct to the police, or contact a relevant safeguarding authority. Flourish will provide signposting where a clear route is known but cannot provide legal advice.

13. Complaints involving associates, subcontractors or third parties

The business owner will coordinate complaints about anyone delivering services on behalf of Flourish. Associates must cooperate fully and promptly, preserve relevant records, provide accurate information and participate in review discussions. Failure to cooperate may be treated as a breach of their working agreement.

Where the complaint concerns a service controlled by another organisation, Flourish may refer or redirect the relevant part to that organisation and explain this to the complainant. Personal information will only be shared where there is a lawful basis and, where appropriate, consent.

If the complaint concerns Natasha Wakeling personally, or there is another material conflict of interest, Flourish will seek an appropriate independent reviewer or external adviser. The complainant will be told who is managing the complaint.

14. Reasonable adjustments and communication support

Flourish recognises that making a complaint may be particularly difficult for neurodivergent, disabled, distressed or traumatised people. Reasonable adjustments will be offered where practicable. These may include:

- accepting a complaint by telephone, voice note or supported conversation;
- providing questions one at a time or in plain language;
- allowing extra processing time and breaks;
- communicating by the person’s preferred method;
- allowing an advocate, supporter or interpreter;
- providing accessible formats; and
- avoiding unnecessary repetition of distressing information.

Adjustments will not change the evidence standard or prevent necessary safeguarding action, but will be used to support fair access to the process.

15. Confidentiality, records and information sharing

Complaint information will be handled confidentially and shared only with people who have a legitimate need to know. This may include the investigator, the person complained about, an independent professional adviser, a supervisor, safeguarding services, insurers, legal advisers, professional bodies or regulators.

The complainant should understand that a fair investigation will usually require the substance of the complaint to be shared with the person complained about. Flourish will minimise unnecessary disclosure and will not share the complainant’s full records where a focused extract or summary is sufficient.

Complaints, incidents and safeguarding records will be stored securely with access controls. Records will be retained for as long as necessary to investigate and evidence the outcome, support learning, respond to legal or insurance matters and meet professional or regulatory obligations. Retention decisions will follow Flourish’s retention schedule and any applicable insurer or professional-body requirements.

Counselling and hypnotherapy records remain subject to professional confidentiality, data-protection law, the counselling contract and lawful exceptions. A complaint does not create an automatic right to receive another person’s information, internal legal advice, insurance correspondence or confidential supervision

records.

16. Outcomes, remedies and learning

Possible outcomes include:

- an explanation or clarification;
- an apology;
- correction of inaccurate information or an administrative error;
- a refund, credit or other proportionate financial remedy where appropriate;
- a change to communication, allocation, booking or service arrangements;
- additional supervision, training, audit or policy changes;
- a restriction, pause or ending of an associate's work for Flourish;
- a safeguarding, professional-body, insurer, ICO or legal referral; or
- no further action where the complaint is not upheld or evidence is insufficient.

Remedies will be fair, proportionate and within Flourish's authority. An apology or service remedy does not necessarily amount to an admission of legal liability. Flourish will record learning and monitor completion of agreed actions.

17. Unreasonable or persistent behaviour

Flourish will not label a complaint unreasonable merely because it is repeated, strongly expressed, complex or made by a distressed person. However, proportionate boundaries may be set where behaviour becomes abusive, threatening, discriminatory, excessively repetitive, knowingly false, or places an unreasonable demand on a small service after the issues have been fully considered.

Any restriction will be explained in writing, kept under review, and will not prevent Flourish from receiving new safeguarding information, evidence of serious wrongdoing or a valid data-protection request.

18. Monitoring, escalation and insurance

Flourish will maintain a secure complaints and incidents log recording the date received, category, people involved, immediate risk actions, investigation steps, outcome, external referrals, learning and closure date. Data will be reviewed at least every six months to identify themes, repeat issues, equality impacts and improvement needs.

Serious complaints, repeated complaints, potential harm, safeguarding concerns, professional misconduct, data breaches, allegations of negligence, injury, financial loss, criminal conduct or significant reputational risk

will be escalated immediately to the business owner and, where appropriate, to insurers, legal advisers, safeguarding contacts, professional bodies or regulators.

Where a matter may give rise to a claim, Flourish will notify its insurer in accordance with policy terms and will avoid admissions or settlements that could prejudice insurance cover. Associates may be required to notify their own professional indemnity insurer and provide confirmation that this has been done.

19. Policy monitoring and review

The founder and business owner is responsible for implementing and reviewing this policy. It will be reviewed at least annually and sooner following a serious complaint, material service change, change in law, updated professional-body, BACP or ICO requirements, insurer advice or identified learning.

Appendix 1 - Complaint information checklist

A complainant may include the following information, but Flourish will provide support where completing a written account is difficult:

- name and preferred contact method;
- whether the complaint is about a service, counsellor, coach, safeguarding concern, personal data or more than one area;
- what happened and when;
- who was involved;
- what impact the matter had;
- what has already been done to try to resolve it;
- copies of relevant messages, documents, screenshots or other evidence;
- any immediate safety or confidentiality concerns;
- reasonable adjustments required; and
- the outcome or remedy sought.