

# ASSOCIATION OF CHILD PSYCHOTHERAPISTS

## INTERIM PROCEDURE FOR INVESTIGATING COMPLAINTS ABOUT ADMINISTRATIVE DECISION-MAKING BY THE ACP

### Introduction

1. This procedure describes how the ACP will handle complaints about decisions, actions or failures to act, which:
  - a. raise a concern about maladministration on the part of the ACP; and
  - b. are not appropriately addressed under any other ACP procedure or policy (see paragraphs 10-13 below).
2. Examples include complaints that could be made by the public about poor and misleading information provided by the ACP, complaints about miscalculation of member subscriptions or arbitrary refusal to allow a member to attend particular conferences. A refusal to allow someone to join the ACP when they are eligible on the face of its Rules and procedures would also fall for consideration under this procedure.

### Making a complaint under this procedure

3. A person or organisation wishing to complain under this procedure ('the complainant') should set out their concerns in writing directly or through another person to the ACP administrator in the first instance:

The Association of Child Psychotherapists  
Suite 7, 19-23 Wedmore Street,  
London  
N19 4RU

Email: [admin@childpsychotherapy.org.uk](mailto:admin@childpsychotherapy.org.uk)

4. If age, language or a disability within the meaning of the Equality Act 2010 would cause difficulties or prevent them from doing so, they may contact the ACP administrator by telephone and ask for an officer to take down the details of the complaint in writing and confirm them then refer the complaint for investigation.

Telephone: 020 7281 8479

### Investigation

5. An identified officer of the ACP (the 'Administrative Complaint Investigator') will be to be charged with investigation of the complaint.

6. The Administrative Complaint Investigator will deal with matters in writing only unless, for some special reason, an interview with the complainant or a third party is necessary to adequately establish facts.

### **Determinations and recommendations**

7. The Administrative Complaint Investigator will normally determine the complaint within 28 days of its receipt unless it is necessary to extend the time scale for one or more periods of up to 28 days to complete the investigation. Where extensions are necessary, the Administrative Complaint Investigator shall inform the complainant and any person or body whose actions are under investigation, explaining why the extension was necessary.
8. The Administrative Complaint Investigator shall put the complaint to any person or body whose actions are under investigation and allow them a reasonable opportunity to respond.
9. Concise written reasons will be given for the determination and any the complainant and any person or body whose actions have been investigated recommendation for action on the part of the ACP.

### **Consideration of determinations and recommendations and action in response**

10. Recommendations for action do not bind the ACP, but all determinations and recommendations will be considered by the Registrar and the Membership Committee (or, if there is another Committee with specific responsibility for the issues raised by the complaint, then that committee) and a decision made on what action is required.

### **Matters not covered by this procedure**

11. The ACP operates:
  - a. arrangements under its Rules to allow membership to be terminated in specified circumstances;
  - b. Disciplinary Procedures for investigation of complaints about breaches of its Code of Conduct and Ethics;
  - c. as part of those Disciplinary Procedures, an appeal procedure for Members that wish to challenge Disciplinary Committee decisions on specified grounds;
  - d. also as part of those Procedures, arrangements allow the Registrar to set aside certain decisions of the Chair of the Ethics Committee, Investigating Panel and Disciplinary Committee on specified grounds; and
  - e. a Serious Impairment to Fitness to Practise Procedure to enable expeditious investigation of serious physical or mental impairments to members' fitness to practise that are or may be of a nature that could imperil the physical or mental health of a patient.

12. Further, ACP-accredited training schools operate their own complaints procedures to address trainees' concerns.
13. Where concerns arise for consideration under any of the procedures listed at 11 and 12 above, including those which must be raised within a specified time frame, they shall not be considered under this procedure.
14. Individual members, whether working in the NHS or in private practice should have adequate arrangements in place to consider and address patients' concerns (or the concerns of patients' parents and others with parental responsibility) that do not raise questions of a breach of the Code of Ethics or a serious impairment to fitness to practise. This procedure focusses only on decisions, actions and failures by the ACP and so is not a substitute for, or an appeal route from, those arrangements.

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