

MIND FULL HUB

COMPLAINTS, CONCERNS, FEEDBACK AND DATA PROTECTION COMPLAINTS POLICY AND PROCEDURE

Organisation: Mind Full Hub

Business Structure: Sole Trader

Business Owner and Responsible Person: Lisa Lloyd-Jones BA (Hons)

Professional Role: Therapeutic Art Specialist Teacher and Family Mentor

Effective From: July 2026

Review Date: July 2027, or earlier where legislation, guidance or business arrangements change

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1. Purpose

Mind Full Hub is committed to providing a professional, respectful, safe and responsive service to children, young people, parents, carers, schools, commissioners, community organisations, customers and professional partners.

Mind Full Hub welcomes feedback and recognises that concerns and complaints can provide valuable opportunities to review practice, resolve difficulties, strengthen professional accountability and improve services.

This policy explains:

- how feedback, concerns and complaints can be raised;
- how complaints will be acknowledged and considered;
- the expected timescales for acknowledgement, investigation and response;
- how children and young people can be supported to express concerns;
- how complaints relating to personal information and data-protection rights will be managed;
- how information will be recorded and stored;
- how confidentiality will be maintained;
- how complainants will be treated fairly;
- how learning from complaints may inform service improvement;
- what may happen where a complaint cannot be resolved directly.

This policy also incorporates the procedure used by Mind Full Hub to receive, acknowledge, investigate, respond to and record complaints relating to personal information and data-protection rights.

Mind Full Hub aims to respond to all concerns and complaints fairly, respectfully, proportionately and without unnecessary delay.

2. Scope

This policy applies to concerns, complaints and feedback relating to services provided directly by Mind Full Hub, including:

- therapeutic art sessions;
- creative wellbeing provision;
- emotional-regulation support;
- family mentoring;
- parent and carer support;
- commissioned work;
- school-based provision;
- community-based provision;
- individual work delivered within a child or young person's home;
- workshops, groups and programmes;
- professional communication;
- administration;
- customer and client experience;
- digital resources and online services;
- physical products where the concern relates to service, communication or complaint handling;
- the collection, use, storage, sharing, security, accuracy, retention or deletion of personal information.

This policy may be used by:

- children and young people;
- parents and carers;
- customers;
- schools;
- commissioners;

- community organisations;
- professional partners;
- other individuals directly affected by a Mind Full Hub service or by the way Mind Full Hub handles their personal information.

Where a complaint relates primarily to another organisation, professional or service, Mind Full Hub will explain this where possible and may direct the complainant to the appropriate complaints process.

3. Principles

Mind Full Hub will aim to ensure that complaints are handled according to the following principles:

- concerns will be listened to respectfully;
- complaints will be taken seriously;
- complainants will be treated fairly and without discrimination;
- raising a concern will not result in unfair or adverse treatment;
- the complaints process will be accessible and proportionate;
- communication will be clear and respectful;
- confidentiality will be maintained as far as reasonably possible;
- information will only be shared where there is a lawful, safeguarding, contractual or professional reason to do so;
- the facts will be considered carefully;
- conclusions will not be reached before relevant information has been reviewed;
- any actual or potential conflict of interest will be acknowledged;
- mistakes will be recognised where they have occurred;
- appropriate action will be taken where improvements are identified;
- complaint records will be maintained securely;
- safeguarding concerns will be managed through safeguarding procedures rather than solely through the complaints process;
- data-protection concerns will be recognised and managed appropriately;
- complaints will be reviewed without undue delay.

Mind Full Hub will aim to resolve concerns at the earliest appropriate opportunity.

4. Difference Between Feedback, a Concern and a Complaint

Feedback

Feedback may include comments, suggestions, compliments or observations about a service.

Feedback may be positive, neutral or constructive and may be used to support service development.

Concern

A concern is an expression of worry, dissatisfaction or uncertainty that may be capable of being discussed and resolved informally.

Examples may include:

- a misunderstanding about communication;
- a question about a session;
- uncertainty about an invoice;
- concern regarding an appointment;
- dissatisfaction with an administrative process;
- a request for clarification.
- Complaint

A complaint is an expression of dissatisfaction where a person believes that:

- a service has not met an expected standard;
- something has been handled incorrectly;
- communication or conduct has been inappropriate;
- agreed arrangements have not been followed;
- personal information has not been handled appropriately;
- a concern has not been resolved satisfactorily;
- action, explanation or review is required.

A person does not need to use the word “complaint” for their concerns to be recognised and considered under this policy.

5. How to Raise a Concern or Complaint

Concerns and complaints may be raised verbally or in writing.

Where possible, written complaints are encouraged because this helps to ensure that the details are understood and recorded accurately. However, a person will not be required to complete a particular form or submit a written complaint if another communication method is more accessible.

A complaint may be made by:

email;
letter;
telephone;
arranged discussion;
another accessible method agreed with Mind Full Hub.

Complaints should normally include, where relevant:

the complainant's name;
preferred contact details;
the name of the child or young person where relevant;
a clear description of the concern;
relevant dates or events;
the outcome or action being requested;
any relevant supporting information.

Complaints should be directed to:

Lisa Lloyd-Jones
Owner and Responsible Person
Mind Full Hub

Email: Lisa@MindFullHub.co.uk

Telephone: 07919285253

***Business Address: Mind Full Hub, 238 Liverpool Road South, Burscough, West Lancashire,
L40 7RF***

Reasonable support will be provided where a person requires help to communicate or submit a complaint.

6. Informal Resolution

Where appropriate, Mind Full Hub will initially aim to resolve concerns through open and respectful discussion.

Informal resolution may include:

- listening to the concern;
- clarifying information;
- correcting a misunderstanding;
- explaining a decision or process;
- reviewing arrangements;
- agreeing an appropriate action;
- offering an apology where appropriate;
- making a reasonable service improvement.

Informal resolution will only be used where it is appropriate to the nature and seriousness of the concern.

A person may request that their concern is considered formally.

Mind Full Hub may also decide that a concern should move directly to the formal complaints process because of its nature, seriousness, complexity or safeguarding implications.

7. Formal Complaints Procedure and Timescales

As Mind Full Hub is currently operated by Lisa Lloyd-Jones as a sole trader and sole practitioner, Lisa is responsible for receiving, recording, reviewing and responding to formal complaints.

The following process will normally apply.

Stage 1: Acknowledgement

Mind Full Hub will aim to acknowledge a formal complaint within **five working days** of receipt.

The acknowledgement may:

- confirm that the complaint has been received;
- summarise the main issues understood;
- request clarification or additional information;
- explain the next steps;
- provide an expected response date;
- identify whether another procedure, such as safeguarding or data protection, also applies.

Where a complaint concerns personal information or data-protection rights, it will be managed in accordance with Section 10 of this policy.

Stage 2: Review and Investigation

The complaint will be reviewed fairly, carefully and proportionately.

This may include consideration of:

- the written or verbal complaint;
- relevant communication;
- appointment or attendance information;
- session or service records;
- terms and conditions;
- policies and procedures;
- invoices or payment records;
- relevant professional or commissioner information;
- information from another person or organisation where appropriate and lawful;
- any relevant data-protection, safeguarding, contractual or professional responsibilities.

Additional information may be requested where this is reasonably required to understand or investigate the complaint.

Where the complaint concerns work commissioned by another organisation, Mind Full Hub may need to inform or consult the commissioner in accordance with contractual, safeguarding, data-protection or professional requirements.

Stage 3: Outcome and Response

Mind Full Hub will normally aim to provide a full written response **within 20 working days** of receiving sufficient information to investigate the complaint.

The response may include:

- a summary of the complaint;
- the information considered;
- the findings;
- any explanation or clarification;
- whether the complaint is upheld, partially upheld or not upheld;
- any apology where appropriate;
- any action already taken;
- any proposed improvement;
- any further options available.

Where additional time is required, the complainant will be informed of:

- the reason additional time is needed;
- the progress made;
- any further information required;
- the expected date of the full response.

The complaint will continue to be considered without undue delay.

8. Complaints Involving Children and Young People

Mind Full Hub recognises that children and young people have the right to express concerns about the support they receive.

Children and young people may communicate concerns through:

- conversation;
- creative expression;
- visual prompts;
- choices;
- supported communication;
- a parent or carer;

- an advocate;
- a trusted adult;
- a professional involved in their support.

A child or young person will not be required to use formal language or complete a written complaint form for their concern to be recognised.

Where appropriate, information about the complaints process will be explained in a way that is accessible to the child or young person.

Their views will be listened to respectfully and considered alongside:

- their age;
- understanding;
- communication needs;
- safety;
- confidentiality;
- parental responsibility;
- safeguarding responsibilities;
- the involvement of relevant professionals.

Where a concern indicates that a child or young person may be at risk of harm, safeguarding procedures will take priority.

9. Safeguarding Concerns

A complaint may contain information that raises a safeguarding concern.

Where there is concern that a child, young person or adult may be at risk of harm, Mind Full Hub will follow the relevant safeguarding policy and procedures.

This may include:

- recording the concern;
- seeking safeguarding advice;
- contacting the relevant local-authority safeguarding service;
- informing the relevant Designated Safeguarding Lead;
- contacting the child's allocated social worker;
- informing the commissioner;

- contacting emergency services where there is an immediate risk; sharing relevant information where this is necessary and lawful.

Safeguarding information may need to be shared without consent where this is necessary to protect a child, young person or adult from harm.

A safeguarding matter will not be delayed while a complaint is being considered.

10. Data Protection Complaints

Mind Full Hub recognises the right of individuals to raise concerns or make a complaint regarding the collection, use, storage, accuracy, security, sharing, retention or deletion of their personal information.

A data-protection complaint may relate to matters including:

- how personal information has been collected;
- the lawful use of personal information;
- the accuracy of information held;
- the security or confidentiality of personal information;
- the sharing or disclosure of information;
- access to personal information;
- a Data Subject Access Request;
- a request to correct inaccurate information;
- a request to delete or restrict the use of information;
- the retention of personal information;
- direct marketing;
- concerns that data-protection rights have not been respected;
- an alleged personal-data breach;
- an alleged failure to comply with applicable data-protection legislation.

A person does not need to use the words “data-protection complaint” for their concern to be recognised and considered under this procedure.

Data-protection complaints may be made verbally or in writing. Mind Full Hub will provide an accessible route for individuals to raise concerns and will not require the use of a particular complaints form.

As the owner and sole practitioner of Mind Full Hub, Lisa Lloyd-Jones is responsible for receiving, recording, investigating and responding to data-protection complaints.

Mind Full Hub will:

- acknowledge receipt of a data-protection complaint as soon as reasonably possible;
- aim to acknowledge the complaint within five working days;
- ensure that acknowledgement takes place **no later than 30 calendar days** following receipt;
- take appropriate steps to investigate the complaint without undue delay;
- consider relevant records, communication and available evidence;
- request additional information where this is reasonably required;
- maintain appropriate communication with the complainant;
- provide progress updates where the investigation cannot be completed promptly;
- explain any anticipated delay and provide an expected timescale;
- communicate the outcome of the investigation clearly;
- explain any action taken or proposed;
- maintain a secure record of the complaint, investigation, outcome and learning.

Mind Full Hub will normally aim to provide a **full written response within 20 working days** of receiving sufficient information to investigate the complaint.

Where the matter is complex, involves another organisation, requires professional, legal or insurance advice, or cannot reasonably be completed within this period, the complainant will be informed of:

- the reason additional time is required;
- the progress made;
- any further information required;
- the expected date of the full response.

The investigation will continue without undue delay.

The outcome response may include:

- a summary of the complaint;
- the information considered;
- the findings;
- whether the complaint is upheld, partially upheld or not upheld;

- any explanation, correction or apology;
- any action already taken;
- any proposed improvement;
- information regarding further rights or options.

Where appropriate, the complainant will be informed that they may raise concerns with the Information Commissioner's Office if they remain dissatisfied with the handling of their personal information or Mind Full Hub's response to their complaint.

Information about data-protection rights and raising a concern is available from the Information Commissioner's Office.

Data-protection complaints will be handled confidentially. Information will only be shared where necessary and lawful, including where professional, legal, insurance, safeguarding or regulatory advice is required.

Complaint records will be stored securely and retained in accordance with Mind Full Hub's data-protection and record-retention arrangements.

11. Complaints About Commissioned Services

Where services have been funded, arranged or commissioned by another organisation, the complainant may also have access to the commissioning organisation's complaints procedure.

Depending upon the nature of the complaint, Mind Full Hub may:

- respond directly;
- inform the commissioner;
- cooperate with a commissioner-led review;
- provide relevant information lawfully and proportionately;
- follow contractual reporting requirements;
- participate in meetings or quality-assurance processes;
- implement agreed actions or recommendations.

The complainant may be advised to contact the commissioner directly where the issue relates to commissioning decisions, funding, referral arrangements or matters outside the responsibility of Mind Full Hub.

12. Independence and Conflicts of Interest

Mind Full Hub recognises that, as a sole-trader business, there is no internal senior manager or separate complaints department available to conduct an independent internal review.

Where a complaint is complex, serious or presents an actual or potential conflict of interest, Mind Full Hub may seek appropriate external professional advice or consultation.

This may include advice from:

- the commissioning organisation;
- a relevant professional adviser;
- an insurer;
- a legal adviser;
- a safeguarding service;
- an appropriate professional or regulatory organisation where applicable.

Any information shared for professional advice will be limited to what is necessary and will be anonymised where appropriate.

External advice does not remove responsibility from Mind Full Hub for responding to the complaint.

13. Confidentiality and Data Protection

Complaint information will be handled confidentially and in accordance with applicable data-protection requirements.

Information may be shared where:

- the complainant has provided consent;
- it is necessary to review or investigate the complaint;
- there is a safeguarding concern;
- there is a legal obligation;
- it is required by a commissioner or contractual arrangement;
- professional, legal or insurance advice is required;
- disclosure is necessary to protect an individual from harm.

Information will only be shared on a relevant, lawful and proportionate basis.

Complaint records may include:

- the complaint;
- communication with the complainant;
- relevant evidence;
- notes of discussions;
- actions taken;
- the final response;
- learning or service improvements.

Records will be stored securely and retained in accordance with Mind Full Hub's data-protection and record-retention arrangements.

14. Fair Treatment and Non-Retaliation

No person will be treated unfairly because they have:

- raised a concern;
- made a complaint;
- raised a data-protection concern;
- supported another person to communicate a complaint;
- provided feedback about a Mind Full Hub service.

Where support is ongoing, Mind Full Hub will aim to maintain professional and respectful communication.

However, the continuation of services may need to be reviewed where:

- the professional relationship has broken down;
- safe and effective support can no longer be provided;
- professional boundaries cannot be maintained;
- there is threatening, abusive or unsafe behaviour;
- another service would be more appropriate.

Any decision will be considered carefully and communicated appropriately.

The welfare and best interests of the child or young person will remain an important consideration.

15. Unreasonable, Abusive or Persistent Behaviour

Mind Full Hub will aim to remain accessible and responsive, including where a person is distressed, frustrated or dissatisfied.

However, abusive, threatening, discriminatory, intimidating or harassing behaviour towards the practitioner or others will not be accepted.

Where communication becomes excessive, repetitive or prevents a complaint from being reviewed effectively, Mind Full Hub may set reasonable boundaries regarding:

- the method of communication;
- the frequency of contact;
- the use of a single agreed communication route;
- matters that have already received a final response;
- expected standards of respectful communication.

Any restrictions will be proportionate and will not prevent new or significant concerns from being considered.

Immediate threats or risks may be reported to the appropriate authorities.

16. Outcomes and Actions

Following review, a complaint may be:

- upheld;
- partially upheld;
- not upheld;
- resolved through explanation or agreed action;
- referred to another organisation where it falls outside the responsibility of Mind Full Hub.

Where appropriate, actions may include:

- an explanation;
- clarification;
- an apology;
- correction of information;

- review of communication;
- changes to procedures;
- policy updates;
- additional professional learning;
- changes to administrative systems;
- service improvements;
- review of professional boundaries;
- consultation with the commissioner or another relevant professional.

An apology or acknowledgement of a person's experience does not automatically constitute an admission of legal liability.

17. Learning and Service Improvement

Mind Full Hub will consider whether a complaint identifies learning that may improve future practice.

Learning may inform:

- policies and procedures;
- communication;
- terms and conditions;
- client and customer journeys;
- safeguarding;
- record keeping;
- accessibility;
- professional development;
- session arrangements;
- service delivery;
- business systems;
- future quality assurance.

As a sole practitioner, Lisa will review complaint themes proportionately as part of professional reflection, operational review and continuing professional development.

Where appropriate, learning may also be discussed through professional coaching, consultation, operational review or commissioner review without unnecessary disclosure of identifying information.

18. Complaints Record

Mind Full Hub will maintain a confidential record of formal complaints.

The record may include:

- date received;
- name of complainant;
- nature of complaint;
- service involved;
- whether the matter relates to data protection or safeguarding;
- acknowledgement date;
- actions taken;
- relevant communication;
- progress updates;
- outcome;
- response date;
- learning identified;
- improvements made;
- date closed.

A complaint log may use anonymised references for wider quality-assurance review.

The absence of complaints will not be assumed to mean that no improvements are required. Mind Full Hub will continue to consider feedback, professional review, legislative developments and service learning.

19. Review of This Policy

This policy will be reviewed annually or earlier where there are changes to:

- legislation;
- consumer requirements;
- data-protection legislation or guidance;
- safeguarding guidance;
- commissioning arrangements;
- business structure;
- service delivery;
- professional responsibilities;
- learning from a complaint or significant concern.

If Mind Full Hub expands and additional practitioners, employees or contractors are introduced, the complaints process will be reviewed to include appropriate management, escalation, accountability and independent-review arrangements.

20. Conclusion

Mind Full Hub is committed to listening to concerns and responding in a fair, respectful, timely and proportionate manner.

Complaints and feedback are recognised as opportunities to clarify concerns, resolve difficulties, strengthen professional accountability and improve services.

Mind Full Hub will aim to ensure that children, young people, families, customers, commissioners and professional partners feel able to raise concerns without fear of unfair treatment.

Complaints relating to personal information and data-protection rights will be acknowledged, investigated, communicated and recorded in accordance with applicable data-protection responsibilities.

Document Approval

Document Owner: Lisa Lloyd-Jones BA (Hons)

Professional Role: Owner, Therapeutic Art Specialist Teacher and Family Mentor

Organisation: Mind Full Hub

Signature: ____Lisa Lloyd-Jones____

Date: ____14th July 2026____

Next Review Date: July 2027, or earlier where required