



Internal Complaints & Grievance Procedure

1. INTRODUCTION

- 1.1 This Procedure applies only to complaints within The Healing Trust (the Trust). The Procedure for complaints by a third party are covered by the External Complaints or Disciplinary Procedures as appropriate.
- 1.2 The Procedure provides a structure for dealing with a complaint which has arisen within the Trust, where both parties are members or employees. It also provides a framework for resolving grievances within the Trust.

2. DEFINITIONS

For the purposes of this Procedure:

Appeal means an appeal from the decision of a Panel after a Panel Meeting.

Appeal Panel means a Panel, appointed by the Standards Officer, to hear an appeal from the decision of a Tutor, Regional or Council Panel.

Appellant means the person who is appealing against the decision of a Complaint Panel

Centre Chair means the elected Chair for the time being of a Trust Healing Centre.

Complainant means the person making a complaint against, or who has a grievance relating to, the Trust, its trustees, members or employees.

Companion means someone assisting the Complainant or the Other Party at a Panel Meeting.

Complaint means any complaint or grievance which one member or employee has against another.

Complaints Register means the register of any complaint made under this procedure, detailing the name of the Complainant, the person or persons complained about, a summary of the nature of the complaint, the date the complaint was made, and the date and nature of the resolution of that complaint.

Council means the Council of The Healing Trust set up in accordance with Section 5 of the Healing Trust Standing Orders

Decision means the decision of a Panel after a Panel meeting.

Elected Office Holder means the elected National Chair, Vice- Chair, Secretary and Treasurer and the Chair, Vice-Chair, Secretary and Treasurer of any Region or Healing Centre.

Employee means any person employed by the Trust.

Healing Centre means a Trust Healing Centre established in accordance with Section 3 of the Healing Trust Standing Orders.

Licensed Tutor means a tutor licensed by the Trust.

Member means any student, healer or community member as defined in Article 4 of the Articles of Association and paragraphs 12 to 19 of the Code of Conduct, or any trustee who has been made an Honorary Member in accordance with Order 4.4 of the Standing Orders; or any Employee, against whom a complaint has been made.

Office Manager is currently Lis Blunden <mailto:lis@thehealingtrust.org.uk>

Other Party means the person or persons, who is or is the subject of the complaint.

Panel means a Regional or Council or Trustee Panel as set out in the Table in section 4.

Panel meeting means the meeting of a Tutor, Regional, or Trustee Panel, as the context requires, to consider a complaint made by a member or employee.,

Parties mean the Complainant and the Other Party.

Regional Chair means the Chair of any Regional Committee who has been elected in accordance with Section 2 of the Standing Orders of the Healing Trust.

Regional Complaint Panel means a Panel appointed by the Standards Officer consisting of three experienced Healer Members, each from a Region other than that of the Parties who, if practicable, do not know the either of the Complaint Parties.

Response means the response made by the Other Party to a Complaint.

Respondent means the party to an appeal who is not the Appellant.

Standards Officer means the Chair of The Healing Trust Governance and Ethics Committee, currently Penny Hamilton <mailto:penny@thehealingtrust.org>

The Trust means The Healing Trust.

Trustee means a Trustee of the Healing Trust appointed in accordance with Section 4 of the Healing Trust Standing Orders.

Trustee Panel means a Panel to consider a complaint against a Trustee, which is made up of the other members of the Board of Trustees.

Tutor Complaint Panel means a Panel of three appointed by the Standards Officer consisting of two members of the Training Team chaired by a Trustee who is not a Tutor.

3. POLICY

- 3.1 The Healing Trust attaches the utmost importance to good working relations throughout the organisation, and it is the aim of the Trust to establish a structure by which problems can be discussed openly and be speedily and fairly resolved. The purpose of this document is to set out this structure.
- 3.2 Any complaint made, or an alleged breach of the Code of Conduct, will be promptly and thoroughly investigated. The aim of this procedure is to ensure that the complainant has the satisfaction of knowing that the complaint has been properly dealt with but also that the Member is protected from any thoughtless and malicious allegation.
- 3.3 If the Complainant agrees, the Trust will try to resolve a complaint informally in accordance with Section 4.
- 3.4 If the complaint cannot be resolved informally, or if the Complainant or the other Complaint Party does not want an informal resolution, the complaint must be dealt with under the formal procedure in Section 5.
- 3.5 There are certain issues which are not appropriate for informal resolution, such as harassment, bullying, inappropriate behaviour or whistleblowing, which must always be subject to the formal complaint procedure.

- 3.6 Whichever procedure is followed, the Complainant will be kept informed of the progress of dealing with the complaint.
- 3.7 All members and employees must be protected against thoughtless and malicious allegations. Action will be taken against any member found to have made such allegations.
- 3.8 The Trust will maintain a Complaints Register, administered by the Office Manager at Central Office.
- 3.9 Every complaint made will be entered into the Trust's Complaints Register.
- 3.10 Subject to the requirements of this procedure, every attempt will be made to ensure that information relating to the Complainant and the other Complaint Party remains confidential throughout the complaint process.
- 3.11 The Trust will notify UK Healers of every complaint which has been made.
- 3.12 If the Standards Officer is of the view that the complaint could give rise to a claim against the Trust, they will notify the Trust's Insurers.
- 3.13 If, at any stage of the procedure, the complaint involves a potential criminal act, the Trust will inform the police and take no further action under this.

4. INFORMAL RESOLUTION

- 4.1 A Complainant who wishes to resolve a complaint informally should advise the Standards Officer who will initiate a meeting with the most appropriate person.
- 4.2 A written record of what was discussed, and any decision and/or agreement made, should be made and signed by the person dealing with the complaint and sent to the Complainant and the Member. A copy must also be sent to the Standards Officer who will keep it on file for a discretionary period of one to five years, subject to no recurrence of the actions leading to the complaint.
- 4.3 If the person dealing with the complaint considers that the issue has the potential to bring the Trust into disrepute, they must inform the Standards Officer

5. FORMAL COMPLAINT PROCEDURE

This procedure must be used where:

- an informal resolution has not been possible,
- there is a perceived conflict of interest,
- the person complained about is an Elected Office Holder or Trustee or
- the complaint involves harassment, bullying or whistleblowing.

6. MAKING A FORMAL COMPLAINT

A formal complaint, except a complaint against an employee, must be made in writing and sent by email to the Office Manager marked “for the personal attention of Lis Blunden” who will forward it to the Standards Officer. A formal complaint against an employee must be made to the Standards Officer.

7. HANDLING A FORMAL COMPLAINT

- 7.1 Within five working days of receiving the complaint the Standards Officer will acknowledge the complaint, explain the complaint-handling procedure and provide approximate timelines.
- 7.2 The Standards Officer will also send the Complainant a complaint form to complete to ensure that the Trust is fully aware of the nature of the complaint, the name of the person or persons complained about, the factual background and any remedy requested. This must be returned to the Standards Officer as soon as possible, accompanied by copies of any relevant documents in support of the complaint. It is helpful to provide as much detail as possible. If the Complainant prefers, they may provide all the information requested in the complaint form by a letter sent by email addressed to the Standards Officer, copied to the Office Manager.
- 7.3 Unless there are exceptional circumstances, the Standards Officer cannot continue handling a complaint until all the required information has been provided, either by completing a complaint form or by letter, and the Complainant has given permission to send that information to the person or persons complained about.
- 7.4 Within five working days of receiving the complaint form or letter, and with the Complainant’s permission, the Standards Officer will send a copy of the complaint, and any supporting documents, to the person or persons who complained about it and invite them to respond and produce their own documentation and evidence within ten working days.
- 7.5 Within five working days of receipt of response, the Standards Officer will send it and any supporting documentation to the Complainant.
- 7.6 Within five working days of receiving the response, the Standards Officer, in consultation with the Office Manager, will appoint an appropriate Complaint Panel (see Section 8) to deal with the complaint.

7.7 The Standards Officer will arrange a meeting of the Complaint Panel, to take place as soon as is reasonably possible. The meeting must be at a time and place convenient for all involved and in surroundings which are conducive to a cordial and supportive atmosphere. If everyone consents, the meeting can be held via Zoom or similar technology. The Standards Officer must give fair notice to the parties of the date and time of the meeting.

7.8 The Standards Officer must inform the Parties of their right to be accompanied by a person of their choice (a “Companion”) to assist them at the Complaint Panel Meeting.

8. RESOLVING A FORMAL COMPLAINT

8.1. The Relevant Complaint Panel

The Panel hearing a complaint will depend on who is complaining about whom, as shown in the table below.

Complainant	Complaint Against	Report Complaint to	Resolution by	Appeal to
Any Member or Employee	A Licensed Tutor	Office Manager	A Tutor Complaint Panel	The Board of Trustees
Any Member or Employee	A Member	Office Manager	A Regional Complaint Panel from another Region	A Trustee Appeal Panel
Any Member or Employee	A Regional Chair	Office Manager	A Regional Complaint Panel from another Region	A Trustee Appeal Panel
Any Member or Employee	An Elected Officer	Office Manager	A Regional Complaint Panel from another Region	A Trustee Appeal Panel but where the Regional Council Complaints Panel recommends removal from office, the Board of Trustees
Any Member or Employee	An Elected Officer	Office Manager	A Trustee Complaints Panel when the Standards Officer considers it more appropriate	The Board of Trustees
Any Employee	Another Employee	Standards Officer	A Trustee Complaint Panel	The Board of Trustees

8.2. The Standards Officer will be available to assist the Complaint Panel and the parties but will act only in an advisory capacity and take no part in the decision-making process.

8.3. If the Standards Officer, or a Complaint Panel, considers that the issue raised is so serious that it should be dealt with under the Disciplinary Procedure, they will consult with the Chair of the trustees who will determine the procedure to be followed. The Standards Officer will then inform the Parties accordingly.

9. PREPARATION FOR THE COMPLAINT PANEL MEETING

9.1 Documents

These will normally be those which have already been sent in support of the complaint or response. It is only in exceptional cases that the Complaint Panel will permit new documents to be produced if they have not already been seen by the Panel and the parties. The Parties should ensure that they have enough copies of all the documents on which they wish to rely for the Other Party and the Complaint Panel.

9.2 Witnesses and Written Statements

The Parties should ensure that any witnesses they wish to call in support of their case are able to attend the meeting. If a witness is unable to attend, a written statement may be used but only if the Complaint Panel and the Parties consent. The Parties should be aware that a written statement can be less persuasive than a live witness.

9.3 Other Advice and assistance

In certain circumstances, if it is mutually agreed, external advice and assistance may be sought during the Formal Complaints Procedure.

9.4 Enquiries

If it is considered helpful to the matter under consideration, the Panel, or the Standards Officer, as appropriate, may make any enquiries or consider any documents which may be necessary to conduct a proper hearing. Under data protection law (UK GDPR), the Complaint Panel should obtain consent from the person who provided information before sharing it. This might mean that some information might have to be anonymised before sharing it.

10 THE PANEL MEETING

10.1. Application of this section

The following paragraphs apply to all Panel Meetings and, apart from the references to witnesses, all Appeal Panel hearings.

10.2. **The Guiding principles**

The purpose of the Panel Meeting is to ensure that the Complainant and the Other Party have every opportunity to state their case and explain what happened and why, so that the Panel can come to an impartial decision based on everything that has been said.

The guiding principle is that the Complainant and the Other Party both feel that they have had the opportunity to put their case to a fair and impartial Panel.

10.3. **Confidentiality**

All Panel Meetings will be held in private and, subject to the requirements of this Procedure and the Trust's Code of Conduct will be confidential to the Panel and the parties.

10.4. **Attendance**

The Complainant and Other Party should make every effort to attend the Panel meeting on the date set. If they do not attend, and there is no reasonable excuse for their absence, the Panel Meeting can be held and concluded in their absence on the basis of the complaint, the response and accompanying documents.

10.5. **Legal representation**

No legal representative may be present at the Panel meeting.

10.6. **The Right to have a Companion**

The **parties** each have right to bring a Companion to the Panel Meeting who attends merely to give support and may take no part in giving evidence unless called as a witness. A Companion may take notes, provided that copies of any notes of evidence are sent to the Standards Officer to form part of the record of the meeting. With the permission of the Panel and the Complainant or Other Party, as appropriate, a Companion may set out the case on behalf of the Complainant or Other Party and respond on their behalf to any comments or points made at the Panel Meeting. A Companion may not answer questions put to the Parties or prevent anyone else at the meeting from speaking.

10.7. **Procedure at the Panel Meeting**

The Panel Meeting is not a court of law, and it is up to the Panel to run it in a way which leads to a fair and impartial decision. This means that the Complainant and the Other Party must each have the opportunity to:

- tell the Panel all the relevant facts;
- show the Panel any documents on which they wish to rely;
- call any witnesses in support of their case and allow them to be questioned by the Panel and the Other Party/Complainant as appropriate.

It is helpful to allow the Complainant to speak first and make their case. The Other Party will then be able to respond once they have heard all the details of the complaint. After the Other Party has spoken and put their case and evidence to the Panel the Complainant must have the opportunity to answer any points made by the Other Party or the Panel.

10.8 Intervention by the Panel

This framework is not intended to be rigid and there may be times during the Panel Meeting when the Panel wishes to intervene and ask questions or discuss issues with the Complainant and/or the Other Party.

10.9 Keeping a Record

The Panel must keep a contemporaneous note of what has been said which will form part of the written record of the meeting.

11 AFTER THE PANEL MEETING

11.1 Notes of the Panel Meeting

11.2 The Panel must send the parties a copy of any notes taken at the Panel Meeting to give them an opportunity to comment on anything that has been recorded.

11.3 Further Enquiries

The Panel may wish to make further enquiries before reaching a decision. If so, the result of those enquiries must be sent to the parties for comment before a decision is made. Under data protection law (UK GDPR), the Panel should obtain the consent of the person who provided information before sharing it. This might mean that some information might have to be anonymised before sharing it.

12 THE DECISION

12.1 The Decision-Making Process

In coming to its decision, the Panel must:

- 12.1.1 rely only on what was said at the Panel Meeting, any documents shown to them and the results of any enquiries made before or after the Panel Meeting;
- 12.1.2 ensure that the decision is fair and reasonable by considering anything which is relevant and ignoring anything which is irrelevant.

12.2 Decision by majority

In the event of a disagreement between members of the Panel, a decision by majority is acceptable. Any disagreement should not be revealed to the parties.

12.3 **Decision in writing**

The decision must be in writing and signed by the Chair of the Panel. It must set out the reasons for the Panel's findings and the evidence relied upon. It must also set out the right to appeal against the decision.

12.4 **The powers of a Panel in particular circumstances.**

Depending on the Panel, the following recommendations can be made but not included in the decision:

- 12.4.1 Where a Tutor Complaints Panel considers that there has been a serious breach of the conditions of a Tutor's Licence, it may recommend to the Board of Trustees that the Licence be revoked. Before The Board takes such a decision, the Tutor should be allowed reasonable opportunity to be heard or to make written representation to the Trustees, who will then decide whether to invoke the Trust's Disciplinary Procedure.
- 12.4.2 A Council Panel hearing a complaint against an Elected Office Holder may recommend to the Board of Trustees that the Office Holder be withdrawn from office on the grounds that their continuation in office would be harmful to the interests of the Trust.
- 12.4.3 Any Panel can recommend to the Board of Trustees that a member be expelled from membership on the grounds their continued membership is harmful or is likely to become harmful to the interests of the Trust, in accordance with Article 9.4 of the Trust's Articles of Association.
- 12.4.4 If a complaint against a trustee acting in the capacity of a trustee is upheld, the Chair of the Board can recommend that the trustee be removed from office in accordance with article 28.9 of the Trust's Articles of Association but not until the trustee has had notice of the proposed resolution and has been given the opportunity to make representations to the trustees in accordance with that Article.
- 12.4.5 Any Panel which considers that the formal Disciplinary Procedure would be more suited to dealing with a complaint has the right to invoke that Procedure instead of this Formal Complaints Procedure.

13 APPEALING A DECISION

13.1 **The Right to Appeal**

A Complainant, or Other Party who is not a Trustee, is entitled to appeal against the decision of a Complaint Panel if they feel that the outcome has not resolved the problem or that any stage of the procedure was conducted wrongly or unfairly. The appropriate Appeal Panel for each category of appeal is set out in the table at Section 8.

13.2 **How to Appeal**

The appeal should be in writing and sent by post or email to the Standards Officer within five days of receiving the decision and should set out the reasons for the appeal.

14 DEALING WITH THE APPEAL

14.1 Appointing an Appeal Panel

On receiving an appeal, the Standards Officer will appoint the appropriate Appeal Panel (see section 8)

14.2 Responding to the Appeal

Within five working days the Standards Officer will send a copy of the appeal to the party who is not appealing (the Respondent) and ask for a response within five working days. The Standards Officer will send a copy of that response to the person appealing (the Appellant) within five working days. If they wish, the Appellant may then reply to that response within five working days.

14.3 Further Information About the Appeal

If necessary, the Standards Officer can ask the Appellant or the Respondent for further information about their appeal or response. The Standards Officer will ensure that each party to the appeal has seen any information provided by the other party.

14.4 Setting a Date for the Appeal Panel

Once the Standards Officer considers that there is sufficient information to put before the Appeal Panel they will arrange a meeting to take place as soon as is reasonably possible at a time and place convenient to everyone involved.

15 THE APPEAL PANEL HEARING

15.1 At the hearing, the Party bringing the appeal will be asked to explain their reasons for appealing. The other Party will be asked to respond.

15.2 The Appeal Panel will consider all the evidence before the Complaint Panel and the written decision of that Panel.

15.3 The Appeal Panel will not conduct a rehearing of all the evidence unless they consider the notes and evidence before them to be flawed or inadequate or they consider the original hearing was conducted unfairly.

15.4 The Appeal Panel will not normally hear fresh evidence but may do so if satisfied that not to do so would be unjust.

16 THE APPEAL PANEL HEARING

16.1. The Role of the Appeal Panel

The Appeal Panel will consider all the evidence before the Complaint Panel and the written decision of that Complaint Panel in order to come to its decision. It will not rehear that evidence unless it considers that the notes and evidence from the Complaint Panel are inaccurate or inadequate or that the original hearing was not conducted fairly.

16.2 No Further Evidence

The Appeal Panel will not normally hear new evidence unless it is satisfied that not to do so would be unjust.

16.3 Procedure at the Hearing

With the exception of any references to witnesses, the provisions of Section 10 apply to an Appeal Panel meeting as if the references to the Complainant were to the Appellant and the references to the Other Party were to the Respondent.

17 THE APPEAL DECISION

17.2 The Powers of the Appeal Panel

An Appeal Panel can either confirm the decision of the Complaint Panel or, if it considers that the original decision was incorrect, it must substitute its own decision.

17.3 The Decision-Making Process

In coming to its decision, an Appeal Panel must:

- 17.3.1 rely only on the evidence at the Complaint Panel Meeting or {if any) at the Appeal Panel hearing;
- 17.3.2 ensure that the decision is fair and reasonable by considering anything which is relevant and ignoring anything which is irrelevant.

17.4 Decision by Majority

In the event of a disagreement between members of the Appeal Panel, a decision by majority is acceptable. Any disagreement should not be revealed to the parties.

17.5 Decision in Writing

The decision must be in writing and signed by the Chair of the Appeal Panel. It must set out the reasons for the Panel's findings and the evidence relied upon.

17.6 The Powers of an Appeal Panel in Particular Circumstances

An Appeal Panel can make any or none of the following recommendations which are not included in its decision:

In an appeal from a Trustee Complaint Panel decision on a complaint against an Elected Office Holder acting in that capacity, the Panel may recommend to the Board of trustees that the Office Holder be withdrawn from office on the grounds that their continuation in office would be harmful to the interests of the Trust.

Any Appeal Panel can recommend to the Board of trustees that the Member be dismissed from membership in accordance with Article 9.4 of the Trust's Articles of Association. The Trust will notify UK Healers that an appeal has been dealt with and whether it had been allowed or dismissed.

18 NO FURTHER APPEAL

There is no further right of appeal from the decision of an Appeal Panel.

19 COSTS OF A COMPLAINT OR APPEAL PANEL

19.1 Expenses of the Parties

Subject to 17.3 below, each Party is responsible for their own expenses incurred in attending a Complaint or Appeal Panel.

19.2 Expenses of the Complaint or Appeal Panel Meeting

The Trust will meet the expenses of convening a Complaint or Appeal Panel Meeting, and the reasonable expenses of the Complaint Panel members.

19.3 Award of Costs Against a Party

A Complaint or Appeal Panel may require the Complainant/Appellant or the Other Party/Respondent to pay the expenses of the Panel and the other party if their behaviour is unreasonable or if they fail to attend a Complaint Panel Meeting without notice and with no reasonable excuse.

20 SUSPENSION PENDING RESOLUTION OF A COMPLAINT

20.1 Members of the Trust

It may be appropriate for a member to be suspended from healing activities and other public duties during this procedure.

20.2 Office Holders

- 20.3 It may be appropriate for an Office Holder to be suspended from their duties during this procedure. Elected Office Holders or Committee members of the Trust are barred from holding office during a period when their membership is suspended for any reason.
- 20.4 The appropriate Region or Centre must be informed immediately and should appoint another Office Holder to perform the duties of the suspended Office Holder until such time as the situation is resolved.

21 NO REFUND OF SUBSCRIPTION

Where a member is suspended or removed, no refund will be given by the Trust of any subscription previously paid for membership of the Trust.

22 TRANSFER TO THE DISCIPLINARY PROCEDURE

If, once the facts of the complaint have been established, a Complaint or Appeal Panel considers that the Member should be subject to the Disciplinary Procedure, it must inform the Standards Officer. If necessary, the Standards Officer will instigate the Disciplinary Procedure and there will be no further action under this Procedure.

Approved by Board of Trustees on: September 2025

Review Schedule: Every two years

Next review due: September 2027