

1.7 EXTERNAL COMPLAINTS AND SAFEGUARDING POLICY

Section I

Article 1: Statement of Principle and Statutory Rights

1.1. Autism Dogs Charity (the "Charity") operates under a mandate of professional accountability. This Policy establishes the formal framework for the receipt, investigation, and resolution of external grievances.

1.2. The procedures established herein do not limit or inhibit the statutory rights of any individual to report concerns to relevant authorities, including the Police or the Charity Commission. It is the sole responsibility of the complainant to verify current contact details and protocols for any authority, including the **Charity Commission** (Charity No: 1199343), prior to engagement.

1.3.1. This Policy does not affect a complainant's right to initiate formal legal proceedings. The Charity strongly recommends that any individual considering a formal complaint or claim consult with a solicitor.

1.3.2. You can find a solicitor by visiting the Law Society's website (<https://solicitors.lawsociety.org.uk/>). You can check if you are eligible for legal aid here (<https://www.gov.uk/legal-aid>). Complainants are signposted to **Citizens Advice** (www.citizensadvice.org.uk) for free and confidential guidance.

1.3.3. The Charity assumes no liability for the quality of third-party services. The Charity advises complainants to do their own research in all the representation options available to them, sources of funding of legal fees, solicitors in their area and legal charities in their area that might be able to help with legal representation.

1.4. It remains the sole responsibility of the complainant to verify the most current contact details and submission protocols for any third-party authority prior to engagement.

1.5. The Charity provides signposting to external regulatory bodies, legal advice centers, and medical professionals purely as a courtesy to assist the complainant in navigating this process.

1.6. The Charity assumes no responsibility or liability for the accuracy, availability, or quality of services provided by these third-party organizations.

1.7. It is the sole and exclusive responsibility of the complainant to independently verify the current contact details, jurisdictional authority, and specific submission protocols of any external body prior to engagement.

1.8. A complaint procedure is initiated by contacting the Charity at (info@autismdogs.co.uk) as well as contacting the Charity's CEO Caroline Preston at (caroline.preston@autismdogs.co.uk).

Article 2: Governance and Independent Oversight

2.1. The Charity formally acknowledges the family relationship between **Caroline Preston (CEO)**, and **Andrew Preston (independent Training Consultant)**, and **Tate Crossley (Trustee)**.

2.2. Any complaint regarding the conduct or decisions involving these three individuals shall be transferred immediately to the **Chair of the Board of Trustees or to a Trustee appointed by the Chair of the Board of Trustees** for independent oversight.

2.3. Where a complainant invokes **governance concerns, conflict of interest provisions, or safeguarding matters** as grounds for escalation to the Chair of the Board of Trustees, the Chair or a Trustee nominated by the Chair shall conduct an **initial screening review** to determine whether the escalation ground is substantiated on the face of the complaint. This screening review shall be completed within ten working days of the escalation request and shall not constitute a full investigation of the complaint. Where the Chair determines that the escalation ground is not substantiated, the complaint shall be returned to the appropriate operational stage of this procedure with written reasons. Where the Chair determines that the escalation ground is substantiated, the complaint shall proceed to trustee-level review in accordance with clause 2.2. The complainant will be notified in writing of the outcome of the screening review in either case. The Chair's screening determination is procedural and does not prejudice the complainant's right to escalate to an external regulatory body.

2.3.1. Where the complaint concerns, in whole or in part, the conduct or decisions of the Chair of the Board of Trustees, the Chair shall take no part in the screening review. In such cases the screening review shall be conducted by a Trustee appointed

by the remaining members of the Board, who shall exercise the same powers and apply the same criteria as set out in clause 2.3. The complainant shall be informed in writing of the identity of the Trustee conducting the screening review in such cases.

2.4. The Charity reserves the right to classify a complaint or complainant as vexatious or unreasonable where the conduct or persistence of the complainant is such that it is disproportionate, harassing, or designed to cause disruption rather than to seek genuine resolution. Indicators that a complaint may be vexatious or unreasonable include but are not limited to: persistent resubmission of complaints that have already been fully considered and determined; submission of complaints that are materially identical to previous complaints without new evidence or grounds; conduct that is threatening, abusive, or intimidating toward staff, volunteers, or trustees; simultaneous pursuit of the same complaint through multiple channels in a manner designed to circumvent or pressurise the procedure; and the use of the complaints process as a mechanism to extract payments or concessions to which the complainant has no established entitlement. Where a complaint is classified as vexatious or unreasonable, the Charity will notify the complainant in writing and may thereafter limit or decline further correspondence on the matter. This determination does not affect the complainant's right to escalate to an external regulatory body.

2.5. Where a complainant submits a further complaint that is substantially the same as a complaint that has already been fully investigated and determined, the Charity may decline to reinvestigate the matter. The Charity will notify the complainant in writing that the matter has been previously determined and will confirm the outcome of that determination. New evidence that was not available at the time of the original investigation will be considered on its merits and may justify a fresh review at the Chair's discretion.

2.6. Complaints should be submitted within six months of the event or conduct giving rise to the complaint, or within six months of the complainant becoming aware of the matter complained of. The Charity will not ordinarily investigate complaints submitted outside this period. The Chair of the Board of Trustees may at their discretion admit a late complaint where there is good reason for the delay and

where it remains possible to investigate the matter fairly. The complainant will be informed in writing whether a late complaint has been admitted.

2.7. Where the volume, frequency, or nature of a complainant's correspondence is such that it places a disproportionate burden on the Charity's staff or trustees, the Charity may designate a single point of contact for all future correspondence relating to the complaint and may specify reasonable limits on the frequency and length of communications. The Charity will notify the complainant in writing of any such arrangement, which will remain in place for the duration of the complaint process. This measure is administrative and does not affect the substance of the complaint or the complainant's right to a full response.

2.8. Where a complainant has initiated or is actively pursuing legal proceedings, a formal regulatory investigation, or an alternative dispute resolution process in respect of the same subject matter as a complaint submitted under this Policy, the Charity may suspend the internal complaints process pending the outcome of those proceedings. The Charity will notify the complainant in writing if this course is taken. The suspension does not affect any obligation the Charity may have under statute or under the terms of any regulatory body's investigation.

Article 3: Safeguarding and Emergency Reporting

3.1. In cases involving immediate risk of harm or suspected criminal activity, individuals must contact the **Police** immediately (999 or 101).

3.2. General safeguarding concerns should be directed to the lead Safeguarding Officer, **Caroline Preston**. If the concern involves the CEO, the report must be directed to the **Chair of the Board of Trustees**.

Article 4: Regulatory Reporting

4.1. Complainants may report serious issues to the **Charity Commission for England and Wales** (www.gov.uk/complain-about-charity).

4.2. Charity identifiers: **Autism Dogs Charity**, Registered Charity Number: **1199343**, Registered Office: **Millpool Farm, Wards Lane, Congleton, Cheshire, CW12 3LN**.

4.3. In case of a change in the Charity's address, name or Trustees, the Complainant can verify the Charity's identifiers by visiting its Charity Commission page. During February 2026 the page was found in this link ([here](#))

Section II

Article 5: Financials, Conduct, and Anti-Leverage Provisions

5.1. These procedures shall not be leveraged to extract unauthorized payments or seek favourable contractual treatment.

5.2. Except as expressly provided in the Client's Contract, the Charity operates a no-refund policy. Financial compensation is only considered in exceptional circumstances where the Charity is clearly at fault and has failed to meet the standards of "satisfactory quality" or "fitness for purpose" as defined by the **Consumer Rights Act 2015**.

5.3. By submitting a formal complaint, the complainant agrees to maintain professional conduct and strictly refrains from harassing reviewers, investigators, or any other member of Charity staff.

5.4. The welfare of an animal, social media disparagement, or the threat of reporting to third parties as leverage to extract payments is strictly prohibited.

5.5. **Limitation of Liability:** In accordance with of the Conditions, the Charity is not responsible for the loss of the Handler's or the Representative's emotional well-being.

Article 6: Animal Welfare and Without-Prejudice Payments

6.1. The Charity may, at its absolute discretion, issue localized goodwill payments for the exclusive purpose of facilitating the retrieval of an animal where the Charity harbours a bona fide concern for said animal's welfare.

6.2. Any refund or goodwill payment issued by the Charity is made strictly "**without prejudice**" and does not constitute an admission of liability, negligence, or breach of contract.

6.3. In instances where the client's fees were sourced, in whole or in part, via crowdfunding, charitable grants, or third-party benefactors, the Charity shall not issue a bulk refund directly to the client.

6.4. To maintain fiscal integrity and donor intent, the Charity shall reallocate any agreed-upon refund to the original contributors in a **proportionate manner** based on their initial percentage of contribution.

6.5. Illustrative Example of Proportionate Reallocation:

1. If a total fee of £4,000 was comprised of £2,000 from Donor A (50%), £1,000 from Donor B (25%), and £1,000 from the Client (25%);
2. And the Charity issues a "without prejudice" goodwill refund of £400;
3. The sum shall be distributed as follows: £200 (50%) directly to Donor A, £100 (25%) to Donor B, and £100 (25%) to the Client.

6.6. The complainant is required to provide verified banking details for all original donors to facilitate these transfers. The Charity reserves the right to withhold the issuance of any such funds until the proportionate distribution can be accurately verified against the original source of funds.

Article 7: Evidentiary and Contractual Requirements

7.1. Formal complaints must be accompanied by comprehensive evidentiary documentation, including visual and audio evidence (video recordings) and complete communication logs with trainers, where appropriate.

7.2. Success of a complaint is contingent upon the complainant demonstrating full compliance with the Service Agreement, including following trainer instructions in good faith, attending remedial sessions, and fulfilling bonding and welfare requirements.

7.3. **Contractual Good Faith:** Success of a grievance is contingent upon the family demonstrating they have fulfilled all obligations under their Contract with the Charity. This includes following trainer instructions in good faith, attending all

remedial and therapy sessions, and ensuring the dog was not overexposed to traumatic experiences (such as violent shutdowns) earlier than instructed.

7.4. The family must prove they provided the animal with sufficient activities, enrichment, and bonding time, and adhered to the Charity Protocols and Instructions regarding diet, exercise, and socialisation.

Article 8: Mental Health and Physical Well-being during the Process

8.1. The Charity recognizes that the complaint process can be distressing. Complainants are responsible for securing appropriate mental health support and consulting professionals as necessary.

8.2. **Health Warning;** The Charity recognises that engaging with a formal complaint process can be demanding, particularly for individuals managing pre-existing health conditions. Complainants are encouraged to take whatever time they need during the process and to seek appropriate support from friends, family, a GP, or a professional adviser as they see fit.

8.3. In cases where a complainant feels unable to engage with the process directly, they may appoint a solicitor or other lawfully authorised third party to correspond and act on their behalf at any stage. The Charity will engage with any such representative in the same manner as it would with the complainant directly. The family remains solely responsible for securing relevant medical and mental health support as it navigates this process.

Section III

Article 9: Resolution Timelines and Appeals

9.1. The Charity shall acknowledge a written complaint within **five (5) working days**.

9.2. A formal investigation shall typically be completed within **thirty (30) working days**.

9.3. If the complainant is not satisfied with the final determination, they may submit an appeal within **thirty (30) working days** of receipt of the final determination. The appeal shall be directed as follows:

(a) Where the complaint concerns the conduct or decisions of **Caroline Preston (CEO), Andrew Preston, or Tate Crossley**, the appeal shall be directed immediately to the **Chair of the Board of Trustees or another Trustee appointed by the Chair** for independent review, in accordance with clause 2.2 of this Policy. The Chair of the Board of Trustees will respond within thirty (30) working days of receipt of the appeal. This determination is final.

(b) In all other cases, the appeal shall be directed to the **CEO**, who will conduct a review and respond within thirty (30) working days. If the complainant remains dissatisfied following the CEO's determination, they may escalate the matter in writing to the **Chair of the Board of Trustees**, whose determination shall be final. The Chair of the Board of Trustees will respond within thirty (30) working days of receipt of the escalation. There is no restriction on any complaint being escalated to the Board of Trustees at this stage.

9.4. Where a complaint raises both governance and operational issues, the matter will require sequential review by the operational team and the Board of Trustees respectively. In such cases the response period is extended to **sixty (60) working days** from the date on which the Charity acknowledges the complaint as complete. The Charity will notify the complainant in writing if this extended timeline applies.

9.5. This Policy, together with the Charity's plain-language Applicant and Client Complaints Procedure, is published on the Charity's website at **www.autismdogs.co.uk** and is available upon request from the Charity at any time. Applicants and clients are informed of the existence of the complaints procedure at the point of application and upon commencement of the programme. A copy of the plain-language procedure is provided to all clients within their programme documentation.

Article 10: Evidentiary Requirements for a Reviewable Complaint

10.1. In order for a complaint to be capable of review, it must be accompanied by all of the evidence upon which it relies at the time of submission. A complaint that is not supported by the requisite evidence will be acknowledged by the Charity and retained on file, but the formal review process will not be initiated until such time as the complainant provides the outstanding evidence. The Charity will notify the complainant in writing of any evidentiary deficiency.

10.2. A complaint must contain all of the following in order to be reviewable:

(a) **Relevant evidence:** the complaint must be accompanied by all documentary, audio, and visual evidence upon which it relies, including but not limited to video recordings, photographic evidence, written communications with Charity staff, training records, veterinary reports, and any other contemporaneous records directly relevant to the matters complained of.

(b) **A clearly identified fault:** the complaint must identify with reasonable particularity a specific failure in the Charity's processes, training provision, or conduct, supported by the evidence submitted. General expressions of dissatisfaction, without a specified fault attributable to the Charity and evidenced accordingly, will not constitute a reviewable complaint.

(c) **A stated desired outcome:** the complaint must set out clearly what outcome the complainant is seeking. Where financial remedy is sought, all sums claimed must be individually itemised, calculated, and supported by receipts, invoices, or other documentary evidence of loss. Claims for unspecified, unquantified, or undocumented sums will not be capable of review.

10.3. Nothing in this Article prevents a complainant from seeking advice from, or presenting a claim to, any external regulatory body, ombudsman, or court of competent jurisdiction. The internal complaints mechanism is provided as a means of seeking resolution directly with the Charity and does not constitute a condition precedent to the exercise of any external legal right.

Article 11: Conduct of the Complainant During the Complaints Process

11.1. The complainant, and any person acting on their behalf, must not contact, harass, single out, pursue, or subject to any form of intimidation or persecution any member of the Charity's staff, volunteers, or Board of Trustees, whether in connection with a complaint or otherwise.

11.2. The Charity's Trustees may only be contacted through the formal channels established by this Policy. The authorised channels for communication with Trustees are: (a) by written correspondence addressed to the Charity's registered office at **Millpool Farm, Wards Lane, Congleton, Cheshire, CW12 3LN**; or (b) by email to **info@autismdogs.co.uk**. Any attempt to contact Trustees directly through personal, social media, or other unauthorised channels is a breach of this Policy and may be treated as grounds for suspension or termination of the complaints process.

11.3. The Trustees' role in the complaints process is strictly that assigned to them under this Policy. Complainants must not seek to engage Trustees as an alternative to following the procedure set out herein, nor should they contact Trustees at a stage of the process prior to that which this Policy specifies. Correspondence sent to Trustees outside the procedure will be directed to the appropriate stage of the process without response.

Article 12: Continuation of Training and Care During the Complaints Process

12.1. The submission of a complaint does not suspend or alter the complainant's obligations under their programme agreement with the Charity. Whilst a complaint is pending, the complainant must continue to engage with the Charity and its training staff, to follow all trainer instructions, and to attend and participate in any remedial training sessions as directed.

12.2. Issues with an Assistance Dog's behaviour, training, or wellbeing are inherently time-sensitive. The complainant must not delay seeking or engaging in remedial training whilst awaiting a complaint outcome. Postponing or avoiding remedial training may compound the issues complained of and may be taken into account in the assessment of the complaint. The complaint procedure is not a substitute for remedial training.

12.3. The family must report issues with the dog as soon as they arise and must seek remedial guidance from the Charity promptly. Failure to report issues at the earliest

reasonable opportunity may affect the Charity's ability to investigate and may be relevant to the assessment of any complaint submitted at a later date.

12.4. The complainant must continue to update the Charity regarding the health and welfare of the dog throughout the complaints process, in accordance with the requirements of the programme agreement.

Article 13: The Nature of Assistance Dog Ownership and the Scope of this Policy

13.1. The family acknowledges that owning and working with an Assistance Dog requires consistent, sustained, and co-ordinated effort by all members of the household. It requires dedicated time and active participation, a willingness to follow professional guidance, and a commitment to the ongoing training and welfare of the dog throughout its working life.

13.2. The family further acknowledges that bonding between the Handler and the Assistance Dog is a distinct and purposeful process that requires active and sustained engagement. Bonding is not equivalent to affection or the simple act of caring for the dog. It requires deliberate, structured interaction directed at building a functional working relationship, and a keen desire on the part of the Handler to engage in that process. The absence of bonding effort on the part of the family cannot constitute a fault attributable to the Charity.

13.3. This Policy must not be used as a means of avoiding or deferring the effort required to work with an Assistance Dog. The submission of a complaint is not an alternative to engaging with the programme, and the Charity reserves the right to take account of the family's engagement with training and remedial guidance when assessing any complaint.

Article 14: Safeguarding

14.1. Where a complaint or communication received by the Charity contains or gives rise to a safeguarding concern — that is, a concern that a child, young person, or vulnerable adult may be at risk of harm, neglect, or abuse — the Charity will not treat that concern solely as a matter to be addressed under this complaints procedure. Safeguarding concerns will be handled in accordance with the Charity's

Safeguarding Policy and the relevant statutory framework, which takes precedence over this Policy in all respects.

14.2. Upon identification of a safeguarding concern, the Charity's designated Safeguarding Lead, **Caroline Preston**, will be notified immediately. Where the concern involves the CEO, it will be referred without delay to the **Chair of the Board of Trustees**, in accordance with clause 3.2 of this Policy.

14.3. Where there is an immediate risk to the safety of any person, the Charity will, and the individual concerned should, contact the Police (999 or 101) and, where appropriate, the relevant local authority children's or adult safeguarding services without delay. The existence of an open complaint will not delay any safeguarding referral.

14.4. Where a safeguarding concern is raised within or alongside a complaint, the safeguarding element will be handled separately and in accordance with statutory obligations. The non-safeguarding elements of the complaint will continue to be processed under this Policy. The complainant will be informed in writing of how the safeguarding matter is being handled, to the extent that this is consistent with the duty of confidentiality owed to any persons involved.

On Behalf of Autism Dogs Charity

CEO

Caroline Preston

Chair of the Board of Trustees

Tom Wilde