



# Complaints Policy

## *EmpowerEd North policy suite*

This policy has been adopted for use from May 2026 and should be reviewed against current legal, safeguarding, commissioning and operational requirements at least annually and whenever guidance or operational arrangements change.

Policy information	Details
Date adopted	May 2026
Review date	May 2027, or sooner following any review trigger listed in this policy
Approved by	EmpowerEd North Founder/Director
Named lead	EmpowerEd North Founder/Director / Complaints Lead - Janice March
Version	1.0 -
Owner/responsible person	EmpowerEd North Founder/Director
Completion status	CURRENT - adopted for use from May 2026. Operational evidence and contact sheets must be kept up to date before each placement.
Operational arrangements	Named complaints lead, alternative lead for conflicts of interest, commissioner escalation routes, safeguarding/allegations routes and external referral information must be confirmed before adoption.

## Immediate action where a complaint raises risk

Safeguarding concern	If a complaint suggests a child or young person is at risk of harm, safeguarding procedures override this complaints process. Contact the DSL/Deputy DSL immediately and follow the Safeguarding Policy.
Allegation about an adult	If the complaint concerns staff, volunteer, contractor, visitor, director or Founder/Director conduct that may meet the harm threshold, follow the Managing Allegations and Low-Level Concerns Policy and local LADO route.
Immediate danger	Call 999 where there is immediate danger, serious injury, crime in progress or urgent medical risk.
Data breach	If the complaint includes a suspected data breach, inform the Data Protection Lead immediately and follow the Data Protection Policy.
Health and safety risk	If there is an urgent health and safety risk, make the situation safe and inform the Health and Safety Lead.



## 1. Purpose

EmpowerEd North aims to provide safe, respectful and effective specialist alternative provision. This policy explains how concerns and complaints will be received, considered, investigated and resolved. It is designed to be clear, accessible, fair and proportionate for learners, parents/carers, placing schools, local authorities, commissioners, staff, visitors and other stakeholders.

EmpowerEd North will use complaints as an opportunity to put matters right where possible and improve practice. A complaint will not result in a learner, family or stakeholder being treated less favourably.

## 2. Scope

This policy applies to complaints about EmpowerEd North's provision, communication, administration, facilities, conduct, learning environment, safety, equality, accessibility, record keeping or commissioned service delivery.

This policy does not replace safeguarding, allegations, whistleblowing, staff grievance, disciplinary, data protection rights, insurance/legal claims, commissioning contract disputes, admission/funding decisions made by a local authority or placing school, or statutory SEND routes. Where another route is more appropriate, EmpowerEd North will explain this and, where reasonable, signpost the complainant.

local safeguarding partnership, LADO, commissioner and contractual procedures where relevant.

UK GDPR and Data Protection Act 2018, where complaints involve personal information or subject access/data rights;

SEND Code of Practice: 0 to 25 years, where concerns relate to SEND support, EHCP outcomes or accessibility;

Equality Act 2010, including reasonable adjustments and anti-discrimination duties;

DfE non-school alternative provision (AP) voluntary national standards, published August 2025;

Alternative provision statutory guidance, Department for Education, last updated 5 February 2025;

Keeping Children Safe in Education (KCSIE) 2025 and Working Together to Safeguard Children 2026, where complaints raise safeguarding concerns;

This policy is informed by the following, where relevant to EmpowerEd North as a specialist part-time alternative provision:

## 3. Legal and guidance framework

### 4. Principles

- Complaints will be taken seriously and handled without defensiveness.
- The process will be accessible and reasonable adjustments will be made where needed.
- Learners will be supported to share concerns in ways that match their communication needs.
- Complainants will be treated with courtesy and will not be disadvantaged for raising concerns.



- Information will be shared only where necessary, lawful and proportionate.
- Safeguarding and immediate welfare concerns take priority over complaint timescales.
- Conflicts of interest will be managed by using an alternative lead wherever possible.
- Learning from complaints will inform policy review, staff training and service improvement.

## 5. Who can complain

A complaint may be raised by a learner, parent/carer, placing school, local authority, commissioner, professional, visitor, member of the public or other person affected by EmpowerEd North’s actions. Learners may complain directly or with support from a trusted adult, advocate, parent/carer or professional.

## 6. Accessibility and learner voice

EmpowerEd North will make reasonable adjustments to help people raise concerns. This may include accepting complaints verbally, providing a meeting, using plain English, allowing support from an advocate, using visuals/AAC, providing additional processing time, or adapting meetings to reduce anxiety or sensory demand.

Where a learner’s communication is limited or non-speaking, staff will consider behaviour, distress, avoidance, body language, AAC, gesture, drawings, objects, trusted adult communication and parent/carer/professional information as part of understanding the concern.

## 7. Stages of the complaints procedure

Stage	Purpose	Usual timescale	Outcome
Stage 1: informal concern	Resolve quickly through discussion with the relevant member of staff or lead.	Normally within 5 working days	Explanation, apology, practical action or escalation to Stage 2.
Stage 2: formal complaint	Written or recorded complaint considered by the Complaints Lead or another suitable senior person.	Acknowledge within 5 working days; response normally within 20 working days	Written response with findings, actions and escalation route.
Stage 3: review	Review of process, fairness, new evidence or unresolved issue by a person not previously involved where possible.	Request within 10 working days of Stage 2 response; response normally within 20 working days	Final internal response and any further action.
External route/signposting	Where relevant, signpost to placing school, commissioner, local authority, LADO, police, ICO, HSE or another relevant regulator/statutory body depending on the issue.	Depends on external body	External process, advice or investigation where within remit.

## 8. Stage 1: informal concerns

Most concerns should be raised as soon as possible with the relevant member of staff, placement lead or director. EmpowerEd North will listen, clarify the concern, consider immediate safety and seek to resolve the matter quickly. An informal concern may



still be recorded where it relates to safety, safeguarding, behaviour, equality, accessibility, complaint patterns or service improvement.

## 9. Stage 2: formal complaint

A formal complaint may be made by email, letter, form, telephone call, meeting or another accessible method. Where a complaint is made verbally, EmpowerEd North will record the complaint and ask the complainant to confirm that the record is accurate where possible.

The complaint should include, where possible:

- name and contact details;
- learner name if relevant;
- what happened, including dates and people involved;
- what has already been tried;
- the outcome being sought;
- any reasonable adjustments needed for communication or meetings.

The Complaints Lead will acknowledge the complaint, decide who will investigate, consider safeguarding or other urgent routes, review relevant records, speak to relevant people where appropriate and provide a written response. If more time is needed, the complainant will be told why and given a revised timescale.

## 10. Stage 3: review

If the complainant remains dissatisfied, they may request a review within 10 working days of the Stage 2 response. The request should explain the grounds for review, such as procedural unfairness, factual inaccuracy, new evidence, inadequate action or unresolved risk. The review will not normally re-investigate every issue unless this is necessary and proportionate.

Where EmpowerEd North is a very small organisation and there is no independent senior person available internally, EmpowerEd North will manage this transparently by using the least conflicted senior person available and, where appropriate, involving the commissioner or seeking external professional advice.

## 11. Complaints involving safeguarding, allegations or low-level concerns

Safeguarding concerns must not wait for the complaints process. If a complaint suggests that a child or young person may be at risk of harm, the DSL/Deputy DSL must be informed immediately and safeguarding procedures followed. If the concern relates to the conduct of an adult working with or on behalf of EmpowerEd North, the Managing Allegations and Low-Level Concerns Policy and local LADO route must be followed.

The complainant may receive limited information where safeguarding, police, LADO, employment, confidentiality or data protection requirements restrict what can be shared. EmpowerEd North will still explain the process as far as it lawfully can.

## 12. Commissioner and placing-school complaints

Where a learner is placed or funded by a school, local authority or other commissioner, EmpowerEd North will respond to complaints about its own service and will also follow any agreed commissioner notification requirements. The complainant may also be able to use the placing school's or local authority's complaint process where the complaint relates to commissioning, funding, suitability of placement, EHCP provision, attendance arrangements or statutory decision-making outside EmpowerEd North's control.



### 13. Anonymous, unreasonable, persistent or abusive complaints

Anonymous complaints will be considered where they raise safeguarding, safety, conduct, data protection or serious service concerns. EmpowerEd North may not be able to respond to an anonymous complainant, but the concern may still be investigated or recorded.

EmpowerEd North will not refuse a complaint because it is difficult or uncomfortable. However, where communication becomes abusive, threatening, discriminatory, repeatedly unreasonable or prevents proportionate resolution, EmpowerEd North may set communication boundaries while still ensuring safeguarding and legitimate concerns are considered.

### 14. Records and confidentiality

Complaint records will include the complaint, relevant evidence, actions taken, correspondence, outcome, learning points and review decisions. Records will be stored securely and retained in line with the Data Protection Policy and retention schedule. Complaint information will be shared only where necessary for investigation, safeguarding, legal, commissioning, insurance, regulatory or improvement purposes.

### 15. Learning from complaints

The leadership team will review complaints at least annually and sooner where there is a serious complaint, safeguarding issue, repeated concern, equality issue, commissioner concern or significant service change. Learning may lead to policy updates, training, supervision, risk assessment review, record changes, environmental changes, communication improvements or commissioner discussion.

### 16. External routes and signposting

The correct external route depends on the issue. EmpowerEd North will not present a body as a regulator where it does not have jurisdiction. Possible routes may include:

- placing school or local authority commissioner complaint process;
- local authority children's social care/MASH where a child may be at risk;
- local LADO route for allegations about adults working with children;
- police where a crime may have been committed or there is immediate danger;
- Information Commissioner's Office for data protection complaints;
- Health and Safety Executive for relevant health and safety concerns or reportable incidents;
- A relevant regulator, statutory body or commissioner only where the matter falls within that organisation's remit at the time.

### 17. Review

This policy will be reviewed annually and sooner following a serious complaint, safeguarding complaint, significant service change, commissioner requirement, legal/guidance change or pattern of complaints.

### 18. Linked policies and templates

- Safeguarding, Child Protection and Safer Recruitment Policy
- Managing Allegations and Low-Level Concerns Policy



- Staff Code of Conduct and Safer Working Practice Policy
- Data Protection Policy and Privacy Notice
- Health and Safety Policy
- Behaviour Support and Restrictive Intervention Policy
- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Complaint Record Form
- Complaint Review Form



## Appendix A: complaint record fields

Field	Information required
Complainant details	Name, role/relationship, contact details, accessibility needs
Learner details	Name, placing school/commissioner if relevant
Nature of complaint	Summary, dates, location, people involved
Risk screen	Safeguarding, allegation, health and safety, data protection, equality, immediate action
Stage	Informal, formal, review, external/signposting
Investigator/lead	Name and conflict-of-interest check
Evidence reviewed	Records, emails, incident forms, interviews, policies
Outcome/actions	Findings, apology, actions, learning, escalation
Closure/review	Date closed, review requested, retention date