

POLICY – Complaints

Children Universal/Hidelow Grange School

Policy Author	Laura Dickie, Head of Policy
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Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
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Staff groups affected	All Homes, Supported Accommodation and Education Staff

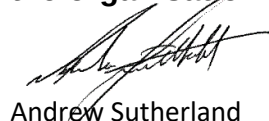
Monitoring and Review

This policy will be monitored on an ongoing basis through the school's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.

Local or service-level alterations may not be made without approval through the organisation's policy governance process.



Andrew Sutherland
Representative, Proprietor- Cambian Group
September 2026



Tom Clarke
Executive Headteacher
September 2026

TERMINOLOGY

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
'Establishment', 'Site' or 'School'	Hidelow Grange School (HGS), an independent specialist SEMH school owned by CareTech Community Services Ltd, part of the Branas Isaf group of schools.
Individual / Learner / Pupil	Any child or young person under the age of 18, or young adult over 18 who receives education at HGS.
Service Head / Head Teacher	Tom Clarke, the senior person with overall responsibility for Hidelow Grange School.
Key Worker / Tutor / Teacher	Members of staff who have teaching responsibility for learners at HGS, or who have special responsibility for pupils' pastoral care.
Parent / Carer	Parent or person with parental responsibility. For Looked After Children, this includes the corporate parent (local authority).
Regulatory Authority	Ofsted - the independent regulatory body responsible for inspecting and regulating independent schools in England.
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the school's location (Buckinghamshire Council) or the learner's home local authority.

Term	Definition
Staff	All staff working at HGS, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.
Responsible Individual (RI)	Kate Jones, Director of Service and Responsible Individual for Branas Isaf group of schools.
Supporting Head Teacher	A Head Teacher from another school within the CareTech/Branas group who may support complaint investigations to ensure impartiality.
Quality Improvement Lead	Tonia Lewis, Quality Improvement Lead (SEMH) for CareTech.

1. LOCAL SCHOOL PROFILE

About Hidelow Grange School

Hidelow Grange School (HGS) is an independent specialist day school operating within CareTech Community Services Ltd, part of the Branas Isaf group of schools. The school is registered for up to 14 pupils aged 11 to 18 years and provides specialist secondary education for young people with Social, Emotional and Mental Health (SEMH) needs, including those who have displayed Harmful Sexual Behaviour (HSB).

Our Context:

- Small, nurturing environment with high staff-to-pupil ratios
- All pupils are placed by local authorities from across England and Wales
- Most pupils hold an Education, Health and Care Plan (EHCP)
- Many have experienced significantly disrupted educational histories, including exclusion, non-attendance, school avoidance and placement breakdown
- All have experienced some combination of trauma, adversity, loss or disrupted attachment
- A number are Looked After Children (LAC)

Our Ethos: HGS operates as an integrated model in which education, care and therapeutic support work together as a single system around each young person. Therapy is informed by the Good Lives Model (GLM), which is grounded in the ethical concept of human dignity and universal human rights.

Our Commitment to Voice: At HGS, we believe that every pupil has the right to be heard, to raise concerns, and to have those concerns taken seriously. We are committed to creating a culture where:

- Pupils feel safe to speak up
- Complaints are seen as opportunities for improvement, not as problems

- All voices—pupils, families, staff, and professionals—are valued and respected
- Resolution is achieved fairly, transparently, and without fear of negative consequences

HGS was judged **Good with Outstanding Features** by Ofsted in November 2024.

2. PURPOSE

Everyone has the right to speak up when something does not feel right.

This policy sets out how children, young people, adults, families, professionals and members of the public can raise **concerns, complaints or compliments** about Hidelow Grange School.

It explains:

- How to raise a concern
- What will happen next
- What individuals can expect from us
- How to access support
- How concerns can be escalated if needed

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Raising a concern is always free of charge and will never negatively affect the care, support or education someone receives.

This policy applies to complaints about any aspect of the school's provision, including:

- Quality of education
- Behaviour or conduct of staff
- Decisions made by the school
- Safety, wellbeing or environment
- Communication or service delivery

3. SCOPE

This policy applies to **Hidelow Grange School** and covers:

- All pupils, including those under and over 18
- All teachers, tutors and education staff
- The wider staff team
- Parents, carers and family members
- Advocates or representatives
- Placing authorities and professionals
- Partner organisations
- Members of the public

The school operates in **England** and implements these standards in accordance with the statutory and regulatory requirements set out in **Appendix A** (England).

4. OUR COMMITMENT

We are committed to ensuring that all concerns are handled in a way that is:

- **Fair** – decisions are made objectively and without bias
- **Transparent** – processes are clear and understood
- **Timely** – concerns are addressed without unnecessary delay
- **Respectful** – individuals are listened to and treated with dignity
- **Child- and person-centred** – the voice of the individual is prioritised
- **Proportionate** – responses match the nature and seriousness of the issue

When concerns are raised, we will:

- Listen carefully, without judgment
- Thank the individual for speaking up
- Ensure immediate safety where required
- Take all concerns seriously
- Respond promptly and appropriately
- Keep individuals informed throughout
- Use feedback to improve services

Our approach is **trauma-informed**, recognising that raising concerns may feel difficult or unsafe for some individuals, particularly given the histories of trauma, disrupted attachment and mistrust of adults that many of our pupils have experienced.

5. WHO CAN RAISE A CONCERN

A concern, complaint or compliment may be raised by:

- **Pupils** (children and young people at HGS)
- **Parents, carers and family members** (including corporate parents for LAC)
- **Advocates or representatives** (including independent advocates, social workers, IROs)
- **Placing authorities and professionals** (social workers, Virtual Schools Heads, educational psychologists, therapists)
- **Partner organisations** (residential homes, therapeutic services, external agencies)
- **Members of the public**

Individuals may raise concerns themselves or through someone acting on their behalf.

6. WHAT THIS POLICY COVERS

This policy applies to concerns about:

- Quality of care, support or education
- Decisions made by the school
- Behaviour or conduct of staff
- Safety, wellbeing or environment

- Communication or service delivery
- Implementation of EHCP outcomes
- Provision for SEND
- Behaviour management and use of physical intervention
- Curriculum content or delivery
- Assessment and reporting
- Transitions and post-16 planning

Concerns raised informally will be recognised and managed within this process where resolution is required.

7. WHAT THIS POLICY DOES NOT COVER

This policy is not intended for:

- **Staff complaints** (see Grievance Procedure)
- **Whistleblowing disclosures** (see Whistleblowing Policy)
- **Admissions to the school** (complaints should be raised with CareTech or the placing authority)
- **Statutory assessments of SEND** (complaints should be raised with the local authority holding responsibility for the child)
- **Exclusion of a pupil from school** (see Exclusions Policy)
- **Staff grievances and disciplinary matters** (see Disciplinary and Grievance Policy)
- **Complaints about external service providers** (complaints should be directed to that provider under their own complaints policy)

Where a concern relates to safeguarding, abuse or risk of harm, this will be managed under safeguarding procedures. The complaints process may continue alongside safeguarding action where appropriate, ensuring both risk management and resolution of concerns are fully addressed.

8. HOW TO RAISE A CONCERN

For Pupils

Pupils at HGS have multiple ways to raise concerns, and we actively support them to do so:

In School:

- Speak to any member of staff you trust
- Speak to your class teacher or tutor
- Speak to the Deputy Head Teacher (Juliet Smith) or Executive Headteacher (Tom Clarke)
- Use the **Pupil Complaints Form** (available in every classroom, the school office, and from any staff member)
- Raise it in **tutor time** or **School Council**
- Write it down and put it in the **Complaints Box** (located in the main corridor)

Through Others:

- Speak to your **key worker** in your residential home, who can bring the concern to the school
- Speak to your **social worker** or **Independent Reviewing Officer (IRO)**
- Speak to your **independent advocate** (all LAC pupils have the right to an independent advocate)
- Speak to any other professional involved in your life (therapist, Virtual Schools Head, etc.)

If you need help:

- If you find it difficult to write, a member of staff (not involved in your complaint) can help you complete the Pupil Complaints Form
- If you prefer to talk rather than write, we can record your complaint for you (with your permission)
- If you use alternative communication methods (symbols, pictures, apps), we will support you to communicate your complaint in the way that works best for you

You will never get in trouble for raising a concern. We want to hear from you, and we will always take you seriously.

For Parents, Carers, and Families

Concerns can be raised in any way that feels comfortable, including:

By phone:

- Call the school office: **[insert school phone number]**
- Ask to speak to your child's class teacher, the Deputy Head Teacher, or the Head Teacher

By email:

- Email the school: **[insert school email]**
- Mark your email: *Confidential for the attention of the Head Teacher*

In person:

- Speak to a staff member when you visit the school
- Request a meeting with the Head Teacher

In writing:

- Write a letter to the Head Teacher at:
 - Hidelow Grange School
 - **[insert school address]**

Through your child's social worker or advocate:

- You can ask your child's social worker, IRO, or advocate to raise the concern on your behalf

Individuals are not required to use formal language and will be supported to express their views in their own way. Reasonable adjustments will always be made to ensure accessibility.

For Professionals and Placing Authorities

Professionals can raise concerns by:

- Contacting the Head Teacher directly by phone or email
- Raising the concern at a review meeting (EHCP Annual Review, PEP, PPM)
- Contacting the Quality Improvement Lead (Tonia Lewis) or Director of Education Services (Andrew Sutherland) if the concern involves the Head Teacher

9. OUR RESPONSE

When a concern is received, we will:

1. **Acknowledge receipt** – normally within **2 working days** (or in line with stage-specific timescales below)
2. **Ensure immediate safety** – if the concern involves a safeguarding issue or immediate risk, this will be addressed immediately under safeguarding procedures
3. **Listen and clarify** – we will make sure we fully understand the concern
4. **Understand the desired outcome** – we will ask what the individual is seeking (e.g., an apology, an explanation, a change in practice, reassurance)
5. **Explain next steps** – we will be clear about what will happen and when
6. **Agree communication methods** – we will ask how the individual prefers to be contacted (phone, email, face-to-face, through an advocate)
7. **Keep the individual informed** – we will provide updates throughout the process

Communication will be adapted to meet the individual's needs and preferences, including:

- Easy Read formats
- Large print
- Visual supports (symbols, pictures)
- Alternative languages (via translation services)
- Communication through an advocate or representative

10. COMPLAINTS PROCESS (FRAMEWORK)

Hidelow Grange School operates a **three-stage approach** to resolving concerns, in line with the Education (Independent School Standards) Regulations 2014 and DfE guidance.

The school aims to resolve concerns as quickly as possible, with formal investigations completed within nationally defined timescales.

Stage 1 – Early Resolution (Informal)

Timescale: 14 days (may be extended to 28 days with agreement)

Purpose: To resolve concerns quickly and informally where appropriate.

Process:

1. **Concern received:** The Head Teacher (or designated staff member) receives the concern.
2. **Initial assessment:** The Head Teacher will:

- Clarify the nature of the concern
- Identify who is involved
- Understand what outcome the complainant is seeking
- Decide whether the concern can be resolved informally or needs to progress to Stage 2

3. Investigation: The Head Teacher will:

- Speak to relevant staff and/or pupils
- Gather any necessary information
- Consider the evidence

4. Resolution: The Head Teacher will:

- Contact the complainant (preferably by phone, followed by email or letter) within **14 days** to explain:
 - What has been found
 - What action will be taken (if any)
 - Whether the concern is resolved
- If more time is needed, the Head Teacher will contact the complainant to explain why and agree a revised timescale (up to a maximum of **28 days**)

5. Recording: If the concern is resolved at Stage 1:

- A summary of the complaint and the resolution will be recorded in the **Complaints Log**
- A copy will be placed in the pupil's file (if the complaint concerns a pupil)
- The complainant will receive written confirmation of the agreed resolution

If the complainant is not satisfied with the outcome, or if the concern cannot be resolved informally, it will progress to Stage 2.

Stage 2 – Formal Investigation

Timescale: 35 days (from the initial complaint)

Purpose: To conduct a thorough, impartial investigation where informal resolution has not been achieved.

Process:

1. Referral to Stage 2: The Head Teacher will:

- Inform the complainant that the complaint is progressing to Stage 2
- Explain the process and timescales
- Confirm the complaint in writing

2. Appointment of Investigating Officer:

- **If the complaint does NOT involve the Head Teacher:** The Head Teacher will lead the investigation, or may delegate to a **Supporting Head Teacher** from another school in the CareTech/Branas group to ensure impartiality.

- **If the complaint DOES involve the Head Teacher:** The complaint will be referred immediately to:
 - **Rob McConomy** (Regional Lead - SEMH): rob.mcconomy@cambiagroup.com
 - **Andrew Sutherland** (Director of Education Services): Andrew.sutherland@caretech-uk.com
- The investigating officer will be someone who has **not been involved in the matter** and is able to act impartially.

3. Acknowledgement: The investigating officer will:

- Acknowledge receipt of the complaint in writing within **2 working days**
- Clarify the substance of the complaint with the complainant and put it in writing
- Provide a copy to the complainant

4. Investigation: The investigating officer will:

- Gather evidence (documents, statements, interviews with staff/pupils/witnesses)
- Review relevant policies, procedures, and records
- Consider all evidence objectively and impartially
- If the complaint relates to another pupil, consult with that pupil's social worker and/or parents/corporate parents

5. Formal Hearing (if appropriate): The investigating officer may decide to convene a **Formal Hearing** to:

- Allow the complainant to present their case in person
- Allow the person complained about to respond
- Hear from witnesses
- Ask questions to clarify the evidence

6. Outcome: The investigating officer will:

- Reach conclusions based on the strength of evidence
- Decide whether the complaint is:
 - **Upheld** (the complaint is justified)
 - **Partially upheld** (some aspects are justified, others are not)
 - **Not upheld** (the complaint is not justified)
- Identify any learning or actions required

7. Written Response: The investigating officer will:

- Provide a full written response to the complainant within **35 days** of the initial complaint, setting out:
 - Findings
 - Decisions and rationale

- Whether the complaint is upheld, partially upheld, or not upheld
- Actions taken or to be taken
- Learning identified
- Right to progress to Stage 3 if dissatisfied
- If this timescale cannot be met, the complainant will be informed of:
 - Reasons for delay
 - Revised timescale
- 8. Notification:** The person(s) about whom the complaint was made will receive the same information in writing, along with any actions requiring attention.
- 9. Recording:** The investigating officer will:
 - Complete a full **Complaints Record** including all evidence, findings, and outcomes
 - Sign off the record and file it in the school's **Complaints Folder**
 - Record the outcome in the **Complaints Log**
 - If the complaint concerned a pupil, send a copy of the complaints record to:
 - The residential home (for inclusion in the young person's file)
 - The young person's social worker
 - The Registered Manager of the residential home (for inclusion in their complaints file)
 - The Responsible Individual (Kate Jones) for compliance oversight

Each complaint must demonstrate learning and any actions taken to improve practice.

If the complainant is dissatisfied with the outcome, they may request a Stage 3 Review Panel.

Stage 3 – Review Panel (Independent Panel)

Timescale: 28 days (from request for review)

Purpose: To provide an independent review of the complaint to ensure fairness and proportionality.

Process:

- 1. Request for Review:** The complainant must:
 - Write to the Head Teacher (or Responsible Individual if the complaint involves the Head Teacher) within **14 days** of receiving the Stage 2 outcome
 - Request a Stage 3 Review Panel
 - Explain why they are dissatisfied with the Stage 2 outcome
- 2. Acknowledgement:** The Head Teacher (or Responsible Individual) will:
 - Acknowledge the request in writing
 - Explain the process and timescales
 - Confirm the date of the Review Panel hearing

3. **Panel Composition:** The Review Panel will consist of **at least three people** who:

- Have not been involved previously in the complaint
- At least **one** of whom is **independent** of the management and running of the school
- For complaints at HGS, the panel will typically include:
 - **Chair:** Andrew Sutherland (Director of Education Services) or another senior leader from CareTech
 - **Two independent panel members:** Senior leaders from other schools/services within CareTech who have no connection to HGS or the complaint
- The name and contact details of the independent person will be included in the formal letter to the complainant

4. **Preparation:** The complainant will be:

- Invited to attend the panel hearing
- Informed of their right to bring someone to support and advise them (e.g., advocate, family member, friend, social worker)
- **For pupils:** Actively supported to access an independent advocate or representative. Pupils may also be accompanied by their parents or a representative of the corporate parent.
- Sent copies of all relevant documents in advance

5. **Panel Hearing:** The panel will:

- Meet within **28 days** of the request for review
- Hear from the complainant, who will be able to present and discuss their complaint fully
- Hear from the investigating officer (or Head Teacher), who will explain the evidence and reasoning which led to the Stage 2 outcome
- Ask questions to clarify the evidence
- Consider all the evidence presented
- Make findings and recommendations based on that evidence
- Minutes will be taken by a suitable person allocated this task

6. **Outcome:** The panel will:

- Decide whether the complaint was handled appropriately at Stage 2
- Decide whether the complaint is:
 - **Upheld** (the complaint is justified and/or the Stage 2 process was flawed)
 - **Partially upheld** (some aspects are justified)
 - **Not upheld** (the complaint is not justified and the Stage 2 process was appropriate)
- Make recommendations for:
 - Actions to be taken
 - Learning for the school
 - Changes to policy or practice

7. **Written Response:** Within **10 working days** of the panel hearing, the panel will provide a written copy of:

- The panel's findings
- The panel's recommendations
- The rationale for decisions
- This will be sent to:
 - The complainant
 - The Head Teacher
 - The Responsible Individual (Kate Jones)
 - Where relevant, the person complained about

8. **Recording:** The panel's findings and recommendations will be:

- Recorded in the **Complaints Record**
- Filed in the school's **Complaints Folder**
- Recorded in the **Complaints Log**

This is the end of the internal complaints process. There is no further internal appeal.

However, the complainant retains the right to escalate to external bodies at any stage (see Section 11).

11. EXTERNAL ESCALATION

Individuals have the right to escalate concerns to relevant external bodies **at any stage** of the complaints process. They are **not required** to complete the school's internal complaints process first.

External Escalation Routes (England)

Complainants may contact:

1. Ofsted (Office for Standards in Education, Children's Services and Skills)

- **For:** Complaints about independent schools, including concerns about safeguarding, quality of education, leadership, or compliance with Independent School Standards
- **Contact:**
 - Phone: 0300 123 1231
 - Email: enquiries@ofsted.gov.uk
 - Online: www.gov.uk/complain-about-school
 - Post: Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD

2. Local Authority (Placing Authority)

- **For:** Complaints about provision for a specific pupil, particularly where the local authority is responsible for placing the child or maintaining their EHCP
- **Contact:** The pupil's social worker, Virtual Schools Head, or SEND team

3. Local Government and Social Care Ombudsman (LGSCO)

- **For:** Complaints about local authority involvement (e.g., EHCP processes, placement decisions, SEND provision)
- **Contact:**
 - Phone: 0300 061 0614

- Online: www.lgo.org.uk
- Post: Local Government and Social Care Ombudsman, PO Box 4771, Coventry CV4 0EH

4. Secretary of State for Education (Department for Education)

- **For:** Complaints about independent schools where there is evidence of a breach of the Independent School Standards
- **Contact:**
 - Online: www.gov.uk/complain-about-school
 - Post: Department for Education, Piccadilly Gate, Store Street, Manchester M1 2WD

5. Independent Schools Inspectorate (ISI) (if applicable)

- **For:** Complaints about schools inspected by ISI (HGS is inspected by Ofsted, so this does not apply)

6. Children's Commissioner

- **For:** Systemic issues affecting children's rights
- **Contact:**
 - Phone: 0800 528 0731
 - Email: info.request@childrenscommissioner.gov.uk
 - Online: www.childrenscommissioner.gov.uk

Raising concerns externally will not negatively affect the care, support or education an individual receives at HGS.

12. ADVOCACY AND SUPPORT

No one should feel they have to raise a concern alone.

We will:

- Actively support access to advocacy services
- Ensure individuals understand their rights
- Encourage individuals to involve someone they trust
- Ensure communication is adapted to individual needs
- Support individuals to feel safe and heard throughout the process

Advocacy for Pupils

All Looked After Children have a legal right to an independent advocate. HGS will:

- Inform all LAC pupils of this right on admission and regularly thereafter
- Proactively offer access to advocacy at all stages of the complaints process
- Support pupils to engage an independent advocate
- Facilitate contact between the pupil and their advocate
- Ensure advocates can attend meetings, hearings, and reviews

For pupils who are not LAC but who would benefit from advocacy support, HGS will:

- Signpost to local advocacy services (e.g., NYAS, Coram Voice)
- Support pupils to access advocacy where appropriate
- Facilitate communication between the pupil and their advocate

Advocacy for Parents and Carers

Parents and carers may bring someone to support them at any stage, including:

- A family member or friend
- An advocate (e.g., SENDIASS, IPSEA)
- The pupil's social worker or IRO
- A representative from a parent support organisation

Support for Pupils to Raise Concerns

HGS recognises that many of our pupils have experienced trauma, disrupted attachment, and mistrust of adults. Raising a concern may feel unsafe or overwhelming. We will:

- Create a safe, non-judgmental environment for pupils to speak up
- Use trauma-informed approaches throughout the complaints process
- Offer multiple ways for pupils to raise concerns (verbal, written, through a trusted adult, through an advocate)
- Provide emotional support and reassurance throughout the process
- Ensure pupils understand that they will not "get in trouble" for raising a concern
- Check in with pupils regularly to ensure they feel safe and supported

13. RECORDING AND CONFIDENTIALITY

All concerns and complaints will be recorded within the school's **Complaints Log and Complaints Records**, which function as a **central record**.

Complaints Log

The **Complaints Log** is a central record of all complaints received by the school. It includes:

- Date complaint received
- Name of complainant (where appropriate; anonymous complaints are also logged)
- Nature of the complaint (brief summary)
- Stage of complaints process
- Investigating officer
- Outcome (upheld / partially upheld / not upheld)
- Date of resolution
- Learning identified
- Actions taken

The Complaints Log is maintained by the Head Teacher and reviewed:

- **Half-termly** by the Head Teacher
- **Termly** by the Quality Improvement Lead (Tonia Lewis)
- **Half-termly** in the Head Teacher's governance report to the Director of Education Services

Complaints Records

For each **formal complaint** (Stage 2 and Stage 3), a full **Complaints Record** will be maintained. This includes:

- Full details of the complaint
- Evidence gathered (statements, documents, interview notes)
- Findings and decisions
- Rationale for decisions
- Outcome classification (upheld / partially upheld / not upheld)
- Actions taken
- Learning identified
- Correspondence with the complainant
- Minutes of any hearings or panel meetings

Complaints Records are stored securely in the school's **Complaints Folder** (physical and electronic), accessible only to:

- The Head Teacher
- The Quality Improvement Lead
- The Director of Education Services
- The Responsible Individual
- Ofsted (on request)
- The Secretary of State for Education (on request)

Confidentiality

All complaints will be handled confidentially. Information will be shared only on a **need-to-know basis** with:

- Staff directly involved in the complaint or its investigation
- The complainant
- The person complained about (where appropriate)
- Senior leaders and governance (for oversight and learning)
- External agencies (where required by law or regulation)

In line with Standard 33(k) of The Education (Independent School Standards) Regulations 2014:

"Correspondence, statements and records relating to individual complaints are to be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them."

Records will be retained in accordance with data protection legislation and the school's Data Retention Policy.

14. LEARNING AND CONTINUOUS IMPROVEMENT

All concerns are used as an opportunity to strengthen practice.

Hidelow Grange School will:

- Review individual complaints for learning
- Identify patterns and trends across complaints
- Take action to improve services
- Share learning with teams and leadership
- Integrate findings into quality assurance processes
- Report learning in governance reports and staff

meetings **How We Use Complaints to Improve**

At individual complaint level:

- Every Stage 2 and Stage 3 outcome will identify specific learning and actions
- Actions will be assigned to named staff with clear deadlines
- Progress on actions will be monitored by the Head Teacher

At whole-school level:

- The Head Teacher will review the Complaints Log termly to identify:
 - Recurring themes (e.g., communication, behaviour management, SEND provision)
 - Patterns by complainant type (pupils, parents, professionals)
 - Patterns by outcome (upheld, partially upheld, not upheld)
 - Areas of strength and areas for improvement
- Findings will be reported to:
 - The Senior Leadership Team
 - The Quality Improvement Lead (Tonia Lewis)
 - The Director of Education Services (Andrew Sutherland)
 - Staff (in staff meetings and CPD sessions)
- Actions will be incorporated into:
 - The School Development Plan
 - Staff training and CPD
 - Policy and procedure reviews
 - Quality assurance processes

Improvements made as a result of feedback will be clearly evidenced in governance reports, staff meeting minutes, and the School Development Plan.

15. LEADERSHIP OVERSIGHT AND GOVERNANCE

Complaints handling is subject to robust oversight at Hidelow Grange School.

Head Teacher Responsibilities

The Head Teacher will:

- Maintain the Complaints Log and Complaints Records
- Ensure all complaints are handled in line with this policy
- Monitor complaint activity and outcomes
- Identify risks and emerging themes
- Ensure learning leads to improvement
- Report complaints data in the **half-termly governance report** to the Director of Education Services, including:
 - Number of complaints received
 - Stage of complaints (Stage 1, 2, 3)
 - Outcomes (upheld, partially upheld, not upheld)
 - Themes and patterns
 - Learning and actions taken
 - Timescales met/not met

Quality Improvement Lead Responsibilities

The Quality Improvement Lead (Tonia Lewis) will:

- Review the Complaints Log termly
- Provide external oversight and challenge
- Support the Head Teacher in identifying learning and improvement actions
- Ensure consistency and fairness across CareTech schools
- Share best practice across the group

Director of Education Services Responsibilities

The Director of Education Services (Andrew Sutherland) will:

- Receive and review half-termly governance reports
- Provide strategic oversight and assurance
- Ensure compliance with regulatory and statutory requirements
- Escalate risks or concerns to the Responsible Individual and Proprietor
- Support the Head Teacher in complex or high-risk complaints

Responsible Individual Responsibilities

The Responsible Individual (Kate Jones) will:

- Provide proprietorial oversight of complaints handling across the Branas Isaf group
- Ensure effective systems and procedures are in place across all schools
- Monitor the number, nature and outcomes of complaints across the group
- Identify trends, patterns and risks at group level
- Ensure learning is acted upon and embedded across schools
- Provide assurance of compliance with regulatory and statutory requirements to the Proprietor
- Support Head Teachers in complex or high-risk complaints
- Chair Stage 3 Review Panels where appropriate

Regulatory Notification

The school will notify Ofsted of complaints where they meet regulatory thresholds, including those involving:

- Safeguarding concerns
- Serious incidents
- Allegations of abuse or neglect
- Significant service failure
- Breaches of the Independent School Standards

Notifications will be made in line with regulatory requirements and timescales.

16. KEEPING INDIVIDUALS INFORMED

Individuals will be kept informed throughout the complaints process.

At each stage, we will explain:

- **What we have considered** - the evidence, documents, and information reviewed

- **What we found** - the facts established through investigation
- **Decisions made and why** - the rationale for conclusions reached
- **Actions taken** - what has been done or will be done as a result
- **Next steps and escalation options** - what the complainant can do if dissatisfied

Communication will be:

- **Clear** - using plain English, avoiding jargon
- **Respectful** - treating all parties with dignity
- **Accessible** - adapted to meet individual needs (Easy Read, large print, visual supports, translation, etc.)
- **Timely** - provided within agreed timescales
- **Transparent** - honest about what can and cannot be

done For pupils, we will:

- Use age-appropriate language
- Check understanding throughout
- Provide visual supports where helpful
- Ensure they have support from a trusted adult or advocate
- Reassure them that they are safe and will not "get in trouble"

17. ACCESSIBILITY

We are committed to ensuring the complaints process is fully accessible to all.

Identifying Accessibility Needs

Accessibility needs will be identified proactively at the point a complaint is received.

We will ask:

- How would you like to communicate with us? (phone, email, face-to-face, through an advocate)
- Do you need any support to engage with this process? (e.g., Easy Read, large print, translation, communication aids)
- Is there anything we should know that will help us communicate with you effectively?

Information Formats

Information can be provided in:

- **Easy Read** - simplified language with pictures and symbols
- **Large print** - 16pt or larger font size
- **Different languages** - via translation services (available within 5 working days)
- **Visual or symbol-supported formats** - using Widgit symbols, Makaton, or other communication systems
- **Alternative communication methods** - audio recording, video, British Sign Language (BSL) interpretation

Reasonable Adjustments

Reasonable adjustments will always be made, including:

- **Extended timescales** - where additional time is needed to process information or respond
- **Alternative meeting arrangements** - quiet spaces, breaks, shorter meetings, virtual attendance
- **Communication support** - advocates, interpreters, scribes, communication aids
- **Accessible venues** - wheelchair access, hearing loops, appropriate lighting
- **Flexible processes** - adapting procedures to meet individual needs while maintaining fairness

How to Request Adjustments

Individuals can request accessibility support by:

- Telling any staff member
- Contacting the Head Teacher
- Asking their advocate or social worker to request on their behalf

Requests will be responded to within **2 working days** with a clear plan of what will be provided.

18. MANAGING UNREASONABLE BEHAVIOUR

We recognise that raising concerns can be distressing, and that individuals may feel frustrated, anxious, or upset during the complaints process. We will always respond with empathy and patience.

However, in rare cases where behaviour becomes unreasonable or prevents the complaints process from progressing, we may need to take action to protect staff and ensure fairness for all.

What is Unreasonable Behaviour?

Hidelow Grange School defines unreasonable behaviour as that which hinders our consideration of complaints because of the frequency or nature of the complainant's contact with the school. This includes behaviour where the complainant:

- Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought, despite offers of assistance
- Refuses to co-operate with the complaints investigation process
- Refuses to accept that certain issues are not within the scope of the complaints procedure
- Insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice
- Introduces trivial or irrelevant information which they expect to be taken into account and commented on
- Raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales
- Makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced
- Changes the basis of the complaint as the investigation proceeds

- Repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
- Refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed, including referral to external bodies
- Seeks an unrealistic outcome
- Makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
- Uses threats to intimidate
- Uses abusive, offensive or discriminatory language or violence
- Knowingly provides falsified information
- Publishes unacceptable information on social media or other public forums

Our Response to Unreasonable Behaviour

Whenever possible, the Head Teacher or Director of Education Services will discuss any concerns with the complainant informally before taking formal action.

If unreasonable behaviour continues, we may:

1. Set clear communication boundaries:

- Specify methods of communication (e.g., email only, no phone calls)
- Limit the number of contacts (e.g., one email per week)
- Designate a single point of contact
- Set specific times for communication

2. Agree alternative contact arrangements:

- Communication via a representative or advocate only
- Scheduled meetings at agreed intervals
- Written communication only

3. Manage or pause engagement where necessary:

- Temporarily pause the complaints process to allow time for reflection
- Request that the complainant seeks independent advice or advocacy
- Close the complaint if all reasonable steps have been taken and no further action is possible

Any action taken will be:

- **Proportionate** - matched to the nature and seriousness of the behaviour
- **Clearly explained** - in writing, with reasons given
- **Regularly reviewed** - at least every 6 months
- **Subject to appeal** - the complainant can request a review of the decision

Support for the individual will continue - restrictions on communication do not affect the care, support or education the pupil receives.

Serious Incidents of Aggression or Violence

In response to any serious incident of aggression or violence, we will:

- Immediately inform the police
- Communicate our actions in writing

- Consider barring the individual from the school premises (in line with section 547 of the Education Act 1996)
- Continue to provide education and support to the pupil (if the complainant is a parent/carer)

Staff have the right to work in a safe environment. We will not tolerate abusive, threatening, or violent behaviour towards staff.

19. EQUALITY AND INCLUSION

This policy promotes fairness, dignity and respect for all.

We will:

- Ensure equitable access to the complaints process for all individuals, regardless of protected characteristics
- Make reasonable adjustments to remove barriers to participation
- Consider individual needs and circumstances throughout the process
- Ensure no one is disadvantaged or discriminated against for raising a concern
- Monitor complaints data to identify any patterns of differential impact on individuals with protected characteristics
- Take action to address any inequalities identified

Equality Impact

This policy has been developed to promote equality, safeguard individual rights, and ensure fair and inclusive practice. The potential impact of the policy on children, young people, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported to the Head Teacher and addressed through ongoing review and quality assurance.

20. IMPLEMENTATION

This policy is supported by:

- **Complaints Standard Operating Procedure (SOP)** - detailed step-by-step guidance for staff
- **Appendix A: Legal and Regulatory Framework (England)** - statutory requirements and guidance
- **Appendix B: Pupil Complaints Form** - accessible form for pupils to raise concerns
- **Appendix C: Complaints Process Flowchart** - visual guide to the stages of the complaints process
- **Appendix D: Pupil-Friendly Complaints Policy** - Easy Read version for pupils

All staff at Hidelow Grange School must:

- Follow this policy and supporting procedures

- Understand their responsibilities in handling complaints
- Maintain accurate records
- Demonstrate compliance and learning
- Treat all complainants with respect and dignity
- Ensure pupils feel safe to raise concerns

Staff Training

All staff will receive training on this policy as part of induction and annually thereafter.

Training will cover:

- How to receive and record a complaint
- How to support pupils to raise concerns
- The stages of the complaints process
- Confidentiality and record-keeping
- Managing difficult conversations
- Recognising and responding to unreasonable behaviour
- Accessibility and reasonable adjustments
- Safeguarding interface with complaints

RELATED POLICIES

This Complaints Policy should be read alongside the following policies:

- Safeguarding and Child Protection Policy
- Behaviour, Relationships and Regulation Policy
- Whistleblowing Policy
- Incidents and Physical Intervention Policy
- SEND Policy
- Equality, Diversity and Inclusion Policy
- Data Protection and Information Governance Policy
- Staff Code of Conduct
- Disciplinary and Grievance Policy (staff)
- Anti-Bullying Policy
- Accessibility Policy
- Admissions Policy
- Exclusions Policy

All policies are available on the school website: **[insert website link]** or in hard copy from the school office.

Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of

differential impact should be reported and addressed through ongoing review and quality assurance

Appendix 1 – England (Complaints Procedure)

1. Legal and Regulatory Framework

Services delivered in England operate in line with:

- Children's Homes (England) Regulations 2015 and Quality Standards
- CQC Regulation 16: Receiving and Acting on Complaints
- Children Act 1989 & 2004
- Care Act 2014
- Education Act 2002
- Education and Inspections Act 2006
- Independent School Standards Regulations 2014

2. Complaints Process (England)

Stage 1 – Early Resolution

- Concerns are addressed informally where appropriate
- Aim to resolve within 5 working days
- Children and young people will be actively supported to understand how to raise complaints, including access to clear and accessible information within the service
- Information about how to complain will be clearly displayed and accessible within the service.

Stage 2 – Formal Investigation

- Acknowledgement within 2 working days
- The investigation will be conducted by a manager who has not been involved in the matter and is able to act impartially
- Evidence will be gathered and assessed objectively
- A full written response will be provided within 20 working days, setting out:
 - findings
 - decisions
 - rationale
 - actions taken

If this is not achievable:

- The complainant will be informed of:
 - reasons for delay
 - revised timescale

Each complaint must demonstrate learning and any actions taken to improve practice.

Stage 3 – Review

Where appropriate, a review may be undertaken to:

- ensure fairness
- confirm the process followed was reasonable and proportionate

This is not a statutory stage and does not restrict external escalation rights.

3. External Escalation (England)

Individuals may contact:

- **Ofsted** – for children's homes, fostering and education settings
- **Care Quality Commission (CQC)** – for regulated health services
- **Local Authority** – particularly where they are the placing authority
- **Local Government and Social Care Ombudsman (LGSCO)** – for complaints relating to local authority involvement
- **Secretary of State for Education** – for independent schools (where applicable)

Individuals may contact external bodies **at any stage** and are not required to complete the organisation's complaints process first.

4. Advocacy and Support (England)

Children and young people will be supported to access advocacy where appropriate.

Services will:

- facilitate access to advocacy
- ensure individuals are supported to express their views
- adapt communication to meet individual needs

5. Recording Requirements

Complaints must be recorded in a system that:

- captures full details of the complaint
- evidences actions taken
- records outcomes and decisions
- supports tracking of timescales
- enables review by regulators (e.g. Ofsted, CQC)

6. Governance and Oversight

Leaders must:

- review complaints regularly
- ensure compliance with regulatory standards
- use complaints to inform quality improvement
- ensure learning is clearly evidenced and implemented