POLICY – Complaints

Children Universal

Policy Author	Laura Dickie, Head of Policy
Approval Date	Feb 2026
Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
Next Review Date	Feb 2029
Version No.	002
Policy Level	Homes and Education
Staff groups affected	All Homes and Education Staff

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Responsible Individual or Senior Leader**.** 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 this policy to ensure accuracy, consistency and compliance.

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

26/11/2026

Vikki Costello

Responsible Individual

Karen Ford

Principal

1. Legal and National Context

This policy is informed by relevant legislation, regulatory frameworks and national guidance across the UK. While requirements differ between nations, the organisation is committed to ensuring complaints are handled in a way that is fair, transparent, timely and consistent.

Wales

- Social Services Complaints Procedure (Wales) Regulations 2005
- Representations Procedure (Wales) Regulations 2014
- Social Services and Well-being (Wales) Act 2014
- Children Act 1989 & 2004
- Education Act 2002
- Education and Inspections Act 2006
- Independent School Standards (Wales) Regulations 2024

General Legal Principles

- Human Rights Act 1998
- Equality Act 2010

2. Purpose

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

This policy explains how children, young people, and adults receiving services—as well as families, carers, professionals and members of the public—can raise concerns or make a complaint.

It explains:

- how to raise a concern
- what will happen next
- what you can expect from us
- how to access support and escalate concerns if needed

There is no cost to making a complaint, and doing so will not negatively affect the care, support, or education you receive.

3. Our Commitment

We believe everyone deserves to feel safe, respected, and listened to.

When you raise a concern, we will:

- Listen carefully and without judgment
- Thank you for speaking up
- Make sure you are safe
- Take your views seriously
- Act fairly and as quickly as possible
- Keep you informed throughout

Our approach is trauma-informed, recognising that past experiences may influence how you feel when raising concerns. We will support you to feel safe and in control.

4. Who Can Complain

Anyone connected to our services can make a complaint, including:

- Children, young people and adults receiving services
- Parents, carers, family members and important others
- Social workers and local authorities
- Advocates or trusted representatives
- Professionals working with the service
- Members of the public

5. What This Policy Is Not For

This policy is not intended for:

- Staff concerns (see Grievance Procedure or Whistleblowing Policy)
- Safeguarding or Child/Adult Protection concerns about harm or risk
  → These must be managed under the Safeguarding or Child/Adult Protection Procedures

6. What Is a Complaint?

A complaint is when someone expresses dissatisfaction about:

- something that feels unfair, unsafe, unkind, or not working properly
- a decision made

- how they have been treated
- the quality of service provided

Concerns raised informally will be treated as complaints where resolution is required.

Safeguarding or Child/Adult concerns are managed separately but may be considered alongside complaints where appropriate.

7. How to Make a Complaint

You can raise a concern in a way that feels most comfortable:

- Speak to a staff member you trust
- Talk to your social worker
- Ask an advocate for help
- Write, email, text, or send a message
- Ask someone else to speak on your behalf

You do not need to use formal language—just explain in your own words.

8. What Happens Next

When a complaint is received, we will:

- Acknowledge it within **2 working days**
- Make sure you are safe
- Listen to your concerns
- Clarify the outcome you would like
- Explain the process clearly
- Keep you updated throughout

We will agree how you would like to be communicated with.

9. Stages of the Complaints Process

Stage 1 – Early Resolution

- Concerns are addressed quickly and informally

- Usually within **5 working days**

Stage 2 – Formal Investigation

- A manager not previously involved will investigate
- May involve speaking to those involved and reviewing records
- Outcome provided within **20 working days**
- If delayed, you will be informed and given a revised timescale

Stage 3 – Independent Review

- Conducted by an independent person or panel
- Reviews the fairness and handling of the complaint
- A written outcome will be provided

10. External Escalation

If you remain dissatisfied after completing the internal complaints process, you have the right to raise your concerns with external bodies. These organisations are independent and can review how your complaint has been handled or consider concerns about the service provided.

We will always support you to access external escalation and provide up-to-date contact details on request.

Wales - Depending on the nature of your complaint, you may contact:

- **Care Inspectorate Wales (CIW)**
  For concerns relating to regulated care services, including residential care and fostering
- **Estyn**
  For concerns relating to education and training provision
- **Local Authority -** For children and young people placed or supported by local authorities
- **Public Services Ombudsman for Wales (PSOW)**
  For complaints about public services, including local authority involvement

Important Information

- You can seek external support at any stage, although external bodies may expect you to have followed the organisation's complaints process first.
- External bodies may review how your complaint was handled or investigate concerns directly where appropriate.
- Raising a concern externally will not affect the care, support or education you receive.

We will always:

- support you to understand your options
- help you make contact if needed
- ensure you feel confident and safe raising concerns

11. Advocacy and Support

You do not have to raise a complaint alone.

Support is available through:

- advocates
- trusted adults
- representatives of your choice

We will:

- help you access advocacy
- ensure your voice is heard
- adapt communication to your needs

12. Recording and Confidentiality

All complaints must be:

- formally recorded within the organisation's agreed system
- documented with:
  - nature of complaint
  - actions taken
  - outcomes
  - learning identified

Information will be handled confidentially and shared only where necessary.

13. Learning and Improvement

Complaints are used to improve services.

We will:

- identify patterns and themes
- review practice and decision-making
- share learning with leadership
- inform training and quality improvement

14. Leadership Oversight and Monitoring

Complaints are monitored at an organisational level to ensure:

- consistency across services
- appropriate handling and outcomes
- identification of trends or risks

Senior leaders review complaints data regularly as part of quality assurance processes.

15. Keeping You Informed

You will be kept fully informed at every stage.

We will explain:

- what we looked at
- what we found
- decisions made and why
- next steps

If not upheld, we will explain this clearly and respectfully and advise on escalation options.

16. Accessibility

We are committed to making this process accessible.

We can provide information in:

- Easy Read
- symbols or visual formats
- large print
- different languages
- other formats based on need

We will adapt communication and provide support to ensure the process is understood.

17. Managing Unreasonable Behaviour

We recognise that complaints can be distressing. In rare situations where behaviour becomes:

- abusive or threatening
- excessively repetitive
- prevents progress

We may:

- set clear communication boundaries
- limit contact methods
- pause the process if necessary

Any action taken will be:

- proportionate
- clearly explained
- regularly reviewed

Support for the individual will continue.

18. Equality and Inclusion

This policy promotes fairness, inclusion and respect.

We will:

- ensure equitable access
- make reasonable adjustments
- consider individual needs

No person will be disadvantaged when raising a complaint.

19. Implementation and Associated Procedures

The organisation operates a single group-wide Complaints SOP **(see Appendix 1)**, which:

- sets out the detailed process for handling complaints
- must be followed by all services

Services must ensure:

- local processes align with this policy and SOP
- staff understand how to manage complaints appropriately
- appropriate systems are used to record and evidence practice

- local complaint routes, advocacy services, regulatory contacts and escalation arrangements are available and accessible to service users
- Where legislation, regulation or statutory guidance requires a specific complaints, representations, appeals or review procedure, that statutory process shall take precedence over this policy and associated SOP.

Appendix 1 - Complaints Standard Operating Procedure (SOP)

1. Purpose

This Complaint Standard Operating Procedure (SOP) sets out the mandatory process for handling complaints across all services, ensuring:

- fairness and consistency
- timely and effective resolution
- compliance with regulatory and inspection expectations
- clear recording, oversight, and learning

All services must follow this SOP alongside the Complaints Policy.

2. Scope

This SOP applies to:

- children, young people and adults receiving services
- parents, carers and families
- professionals and placing authorities
- members of the public

It applies across all service types:

- education
- residential care

3. Key Principles

All complaints must be:

- taken seriously and responded to promptly
- handled fairly, impartially and respectfully
- clearly recorded and monitored
- used to inform learning and service improvement

4. Roles and Responsibilities

All Staff

- recognise and respond appropriately to complaints
- report complaints immediately
- ensure concerns are recorded
- support individuals to raise concerns safely

Head of Service (or equivalent)

- holds overall accountability for complaint handling
- ensures investigations are timely and appropriate
- signs off Stage 2 complaint outcomes
- ensures learning is identified and implemented

Manager (or nominated lead)

- ensures complaints are logged and tracked
- monitors progress and timescales
- supports investigation processes
- ensures communication is maintained with complainants
- escalates risks and delays

Senior Leadership / Central Oversight

- reviews complaint trends and patterns
- ensures consistency across services
- provides organisational assurance and oversight

5. Definition of a Complaint

A complaint is:

Any expression of dissatisfaction, whether verbal or written, about the service provided, actions taken, decisions made or behaviour of staff.

6. Safeguarding / Child/Adult Protection and Risk

Where a complaint includes:

- risk of harm
- abuse or neglect
- serious incidents

It must be **immediately referred to safeguarding or child/adult protection procedures**.

The complaints process and safeguarding or child/adult protection procedures may run in parallel.

7. Complaints Process

Stage 1 – Early Resolution

Aim: Resolve concerns quickly and informally

Timescale:

- Resolution within **5 working days**

Actions:

- listen to the concern
- clarify desired outcome
- seek to resolve promptly and appropriately
- record actions and outcome

If unresolved, escalate to Stage 2.

Stage 2 – Formal Investigation

Aim: Provide a clear, formal response

Timescales:

- Acknowledgement within **2 working days**
- Full response within **20 working days**

Actions:

- appoint an investigating manager (not previously involved)
- gather evidence (records, discussions, documentation)
- assess findings objectively
- determine outcome:
  - upheld
  - partially upheld
  - not upheld
- provide a written response including:
  - findings
  - rationale
  - actions taken

If additional time is required, the complainant must be informed with reasons and revised timescales.

Stage 3 – Independent Review

Aim: Ensure fairness and proportionality

Actions:

- appoint an independent reviewer or panel
- review the handling and outcome of the complaint
- provide a written outcome

This stage must be independent of all earlier stages.

8. External Escalation

External escalation must be clearly explained and supported in line with the Complaints Policy.

Services must ensure that complainants are aware of their right to escalate complaints to relevant external bodies and are supported to do so.

9. Recording and Monitoring of Complaints

All complaints must be recorded within the service's agreed recording system.

The system must:

- accurately capture all required complaint information
- enable tracking across all stages of the process
- record actions taken and outcomes reached
- monitor compliance with timescales
- support identification of patterns, themes and learning

There is no requirement for a separate complaints log where the system provides this functionality. Services must ensure that complaint data can be easily accessed, reviewed and reported for quality assurance and oversight purposes.

10. Acknowledgement and Communication Standards

All complaints must be acknowledged promptly.

Acknowledgement must:

- confirm receipt of the complaint
- explain the complaints process and next steps
- set out expected timescales
- provide a named or identified point of contact
- explain how the complainant will be kept informed

Acknowledgement may be provided in a format appropriate to the individual, including verbal communication where appropriate. Where verbal acknowledgement is used, a record must be made within the complaint record.

Services are not required to use a standardised template; however, all communication must be:

- clear and accessible
- consistent with the expectations above
- responsive to the needs of the complainant

11. Monitoring and Quality Assurance

Services must:

- ensure complaints are reviewed regularly at service level
- evidence actions and outcomes
- identify themes and patterns
- demonstrate learning and improvement

At organisational level:

- complaint data will be reviewed to identify trends and risks
- consistency of handling will be monitored
- findings will inform quality improvement

Compliance with recording and communication expectations will be reviewed through audit and case file review processes.

12. Learning and Improvement

Each complaint must demonstrate:

- reflection on what went wrong (where applicable)
- identification of learning
- actions taken to improve practice

Learning should be shared within teams and through management oversight structures.

13. Managing Unreasonable Behaviour

Where behaviour becomes:

- abusive, threatening or aggressive
- excessively repetitive
- prevents progression of the complaint

Services may:

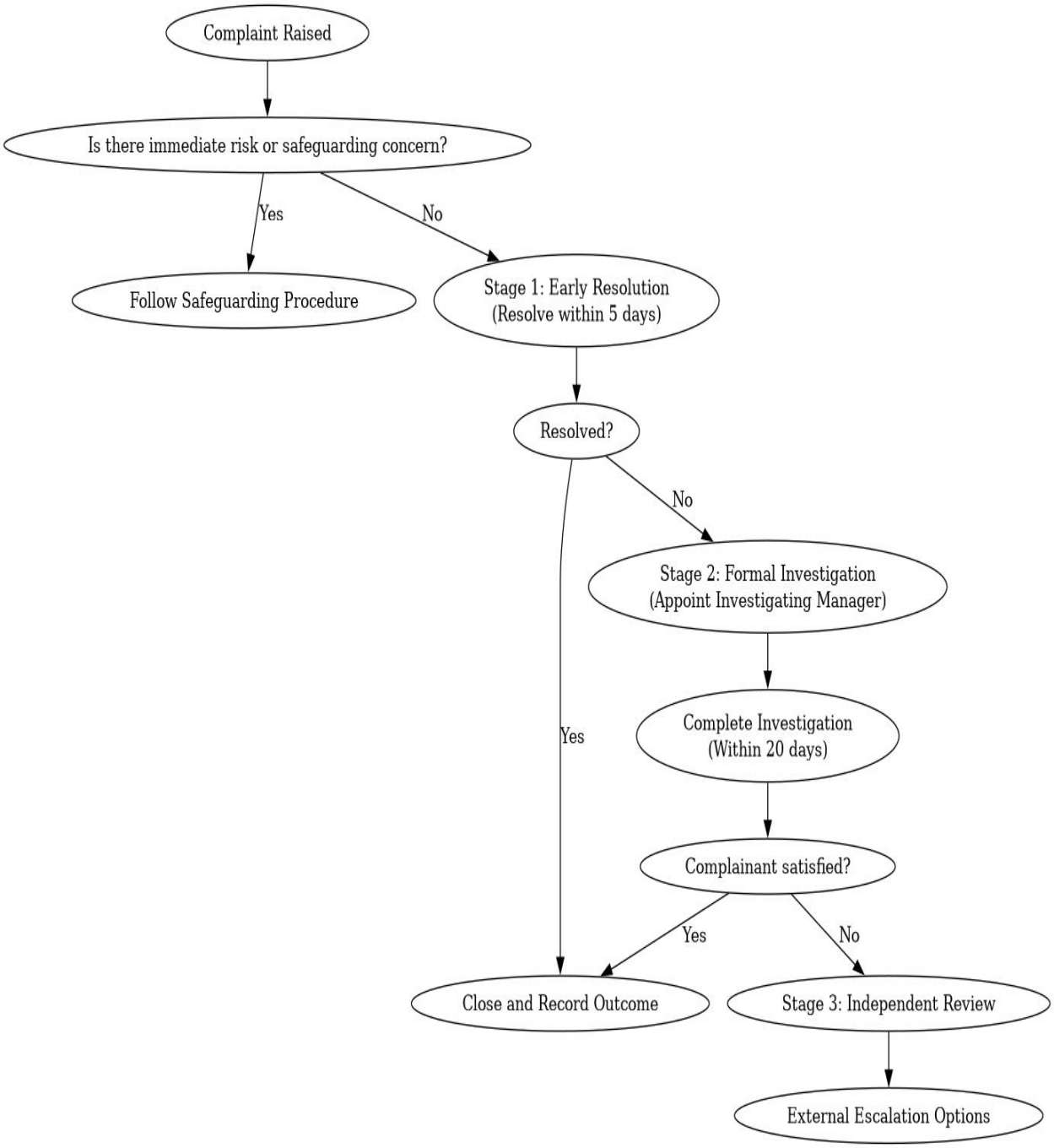
- set boundaries regarding communication
- limit contact methods
- pause or manage the complaint appropriately

All actions must be:

- proportionate
- recorded
- reviewed

Support for individuals involved must remain in place.

Appendix 2 – Complaints Flow Chart


Complaint Raised
Is there immediate risk or safeguarding concern?
Yes
No
Follow Safeguarding Procedure
Stage 1: Early Resolution
(Resolve within 5 days)
Resolved?
No
Yes
Stage 2: Formal Investigation
(Appoint Investigating Manager)
Complete Investigation
(Within 20 days)
Complainant satisfied?
Yes
No
Close and Record Outcome
Stage 3: Independent Review
External Escalation Options