



Complaints Policy

Policy Owner: Lets Make Change

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Approved by: Joseph Fitzpatrick

Version	Date	Author/Reviewed By	Summary of Changes	Approved By	Review Date
1.0	01/09/26	Alex Fitzpatrick	Initial policy created	Joseph Fitzpatrick	Sept 2027

Let's Make Change (LMC)

Complaints Policy

1. Policy Statement

Let's Make Change (LMC) is committed to providing safe, high-quality, inclusive and responsive educational services.

LMC welcomes feedback and recognises that concerns and complaints provide an opportunity to resolve difficulties, improve services and strengthen organisational practice.

All complaints will be:

- Taken seriously;
- Handled fairly and impartially;
- Managed without unreasonable delay;
- Treated respectfully;
- Managed confidentially where appropriate;
- Used to identify learning and improvement.

No learner, parent, carer, member of staff or other individual will be treated unfairly because they have raised a genuine concern or complaint.

2. Purpose

The purpose of this policy is to:

- Provide a clear and accessible process for raising concerns;
- Encourage early and informal resolution where possible;
- Ensure formal complaints are investigated fairly;
- Establish clear escalation routes;
- Protect the rights and dignity of everyone involved;
- Identify safeguarding concerns promptly;
- Ensure appropriate records are maintained;
- Promote organisational learning and continuous improvement.

3. Scope

This policy may be used by:

- Learners;
- Parents and carers;

- Referring schools;
- Local Authorities;
- Commissioners;
- Partner organisations;
- Members of the public;
- Visitors;
- Contractors and service users.

Complaints may relate to:

- Quality of education or support;
- Conduct of staff, tutors or volunteers;
- Communication;
- Learner welfare;
- Transport;
- Community-based provision;
- Health and safety;
- Equality and inclusion;
- Administrative decisions;
- Application of LMC policies and procedures.

4. Matters Managed Under Other Procedures

Some concerns require a different procedure.

Matter	Relevant Procedure
Safeguarding concern about a learner	Safeguarding and Child Protection Policy
Allegation against an adult working with children	Allegations Against Staff / LADO procedure
Employee concern about their own employment	Grievance Policy
Suspected staff misconduct	Disciplinary Policy

Public-interest disclosure	Whistleblowing Policy
Data protection concern	Data Protection, Privacy and Information Security Policy
Criminal allegation	Police / safeguarding procedures

Where a complaint contains several different issues, LMC may manage different elements under the most appropriate procedure.

Safeguarding will always take priority.

5. Principles

LMC will ensure that:

- Complaints are taken seriously;
- Informal resolution is considered first where appropriate;
- Complainants are treated respectfully;
- Staff involved are treated fairly;
- Investigations are proportionate;
- Relevant evidence is considered;
- Decisions are not predetermined;
- Conflicts of interest are avoided;
- Confidentiality is maintained where possible;
- Clear reasons are given for decisions;
- Learning is identified and implemented.

6. Definitions

Concern

An expression of worry or dissatisfaction that may be capable of being resolved informally.

Complaint

An expression of dissatisfaction about an action, omission, decision, service or conduct for which a response or corrective action is sought.

Complainant

The person raising the complaint.

Complaints Lead

The person appointed by LMC to oversee complaint handling and monitoring.

Working Day

A normal LMC working day excluding weekends, public holidays and periods when LMC is formally closed.

7. Roles and Responsibilities

Director

The Director is responsible for:

- Ensuring an effective complaints procedure is maintained;
- Appointing a Complaints Lead;
- Reviewing serious or high-risk complaints;
- Ensuring appropriate actions are implemented;
- Monitoring significant complaint themes.

Complaints Lead

The Complaints Lead is responsible for:

- Logging formal complaints;
- Acknowledging complaints;
- Determining the appropriate process;
- Monitoring timescales;
- Appointing investigators where required;
- Maintaining records;
- Coordinating communication;
- Monitoring actions arising from complaints.

Investigator

The investigator must:

- Act impartially;
- Gather relevant evidence;
- Consider evidence supporting and contradicting the complaint;
- Maintain confidentiality;
- Produce clear factual findings.

All Staff

Staff must:

- Cooperate with complaint investigations;
- Provide honest and accurate information;
- Preserve relevant evidence;
- Maintain confidentiality;
- Report safeguarding concerns immediately.

8. Accessibility and Reasonable Adjustments

LMC will make reasonable adjustments to ensure the complaints procedure is accessible.

This may include:

- Accepting verbal complaints;
- Providing accessible documents;
- Allowing an advocate or representative;
- Providing interpretation;
- Adapting meetings;
- Supporting children to express their views;
- Considering disability or communication needs.

9. Raising a Complaint

Complaints should normally be raised as soon as possible.

Formal complaints should preferably include:

- Complainant's name and contact details;
- Learner name where relevant;
- Details of what happened;
- Relevant dates and locations;
- Individuals involved;

- Actions already taken;
- Desired outcome;
- Supporting evidence.

Where a complaint is made verbally, LMC may produce a written summary for confirmation.

10. Time Limits

Complaints should normally be raised within three months of the incident or the most recent incident in a connected series.

LMC may consider older complaints where:

- There is a reasonable explanation for delay;
- Safeguarding issues are involved;
- Evidence remains available;
- It is fair and proportionate to investigate.

11. Stage One – Informal Resolution

Where appropriate, LMC will first seek to resolve concerns informally.

This may involve:

- Clarification;
- Explanation;
- Apology;
- Correcting information;
- Reviewing an arrangement;
- Meeting with those involved;
- Agreeing practical actions.

LMC will normally aim to respond to informal concerns within five working days.

Where the complainant remains dissatisfied, they may proceed to Stage Two.

12. Stage Two – Formal Complaint

Formal complaints should be submitted to the Complaints Lead.

LMC will normally acknowledge the complaint within three working days.

The acknowledgement should confirm:

- The issues being considered;
- Who will manage or investigate the complaint;

- The anticipated timescale;
- Whether further information is required.

LMC will normally aim to issue a formal outcome within 20 working days.

Where more time is required, the complainant will be informed.

13. Initial Risk Assessment

On receipt of a formal complaint, LMC will assess:

- Whether anyone is at immediate risk;
- Whether safeguarding procedures apply;
- Whether the police or another agency should be involved;
- Whether evidence must be preserved;
- Whether interim measures are needed;
- Whether the complaint falls under another policy;
- Whether a commissioner or school must be informed.

14. Investigation

An investigation may include:

- Reviewing correspondence;
- Reviewing policies and procedures;
- Interviewing the complainant;
- Interviewing staff involved;
- Speaking with witnesses;
- Reviewing attendance or incident records;
- Reviewing electronic evidence where lawful;
- Seeking specialist advice.

The investigator must remain impartial and avoid assumptions.

15. Standard of Proof

Complaints will be determined on the **balance of probabilities**.

This means deciding whether it is more likely than not that the event or conduct occurred.

A complaint that is not upheld is not automatically false or malicious.

16. Complaints Involving Learners

Where a learner is involved, LMC will:

- Prioritise safeguarding;
- Consider the learner's wishes and feelings;
- Communicate appropriately for their age and needs;
- Avoid repeated or unnecessary questioning;
- Consider SEND and communication requirements;
- Involve the DSL where appropriate.

17. Safeguarding Complaints

Any complaint suggesting that a learner may have suffered harm or may be at risk must be referred immediately to the DSL.

This includes allegations involving:

- Abuse;
- Neglect;
- Exploitation;
- Unsafe supervision;
- Professional boundaries;
- Physical intervention;
- Sexual harassment or violence;
- Online harm;
- Failure to report a safeguarding concern.

The complaints process must never delay safeguarding action.

18. Complaints About Staff

Complaints regarding staff may result in:

- Management guidance;
- Further supervision;
- Training;
- Safeguarding action;
- Disciplinary investigation;
- External referral.

The complainant may be informed whether their complaint was upheld and what general action has been taken.

Confidential employment sanctions will not normally be disclosed.

19. Complaints About the Director

Complaints concerning the Director will be considered by an appropriately independent person who has not been directly involved in the matter.

This may include:

- Another Director;
- External HR adviser;
- Independent investigator.

The person complained about must not determine the complaint outcome.

20. Complaint Outcomes

A complaint may be:

- Upheld;
- Partially upheld;
- Not upheld;
- Unable to be determined because of insufficient evidence;
- Resolved by agreement;
- Outside the scope of this policy;
- Withdrawn.

Where shortcomings are identified, actions may include:

- Apology;
- Correction of records;
- Staff guidance;
- Training;
- Increased supervision;
- Policy review;
- Risk assessment review;
- Service improvement;
- Disciplinary consideration;
- External referral.

21. Formal Outcome

The written outcome should normally include:

- Summary of the complaint;
- Investigation process;
- Evidence considered;
- Findings;

- Whether each issue was upheld;
- Reasons for the decision;
- Actions that can appropriately be disclosed;
- Appeal arrangements.

22. Stage Three – Review / Appeal

A complainant may request a review where they believe:

- The procedure was not followed fairly;
- Relevant evidence was overlooked;
- The findings were unreasonable;
- Significant new evidence exists;
- The proposed resolution is inadequate.

Appeals should normally be submitted within 10 working days of the Stage Two outcome.

23. Appeal Process

The appeal should be considered by a person who:

- Was not the original investigator;
- Has not previously determined the complaint;
- Has sufficient authority and impartiality.

The reviewer may:

- Confirm the outcome;
- Vary the outcome;
- Overturn the outcome;
- Direct further investigation;
- Recommend additional action.

The Stage Three outcome will normally be LMC's final internal response.

24. Anonymous Complaints

Anonymous complaints will be considered according to:

- Seriousness;
- Credibility;
- Specificity;
- Availability of evidence;
- Safeguarding implications.

Safeguarding concerns will always be considered regardless of whether the complainant identifies themselves.

25. Persistent or Unreasonable Complaint Behaviour

LMC will not treat someone as unreasonable merely because they complain or disagree with an outcome.

However, unreasonable behaviour may include:

- Repeatedly raising the same concluded issue;
- Abusive or threatening communication;
- Excessive communication that significantly disrupts services;
- Deliberately providing false information;
- Harassing staff;
- Publishing confidential information inappropriately.

Where necessary, LMC may establish proportionate communication boundaries.

Safeguarding concerns will always remain reportable.

26. Malicious Complaints

No action will be taken against a person who raises a genuine complaint that is not upheld.

However, knowingly false or malicious complaints may result in appropriate action.

A complaint being unsuccessful does not establish that it was malicious.

27. Confidentiality and Data Protection

Complaint information will only be shared where necessary for:

- Investigation;
- Safeguarding;
- Decision-making;
- Legal compliance;
- Contractual oversight.

Records will be managed in accordance with LMC's Data Protection, Privacy and Information Security Policy.

28. Record Keeping

Complaint records may include:

- Original complaint;
- Acknowledgements;
- Risk assessments;
- Investigation records;
- Evidence;
- Meeting notes;
- Findings;
- Outcomes;
- Appeals;
- Actions;
- Closure information.

Records will be stored securely.

29. Learning From Complaints

The Complaints Lead will monitor:

- Number and type of complaints;
- Response times;
- Outcomes;
- Recurring themes;
- Safeguarding issues;
- Equality considerations;
- Actions arising.

Management will use complaint information to identify:

- Training requirements;
- Policy improvements;
- Communication issues;
- Quality improvements;
- Risk-management actions.

30. External Escalation

Where LMC's internal procedure has concluded, external routes may include, depending on the issue:

- Referring school;
- Commissioning Local Authority;
- Information Commissioner's Office;

- Health and Safety Executive;
- Ofsted where within its remit;
- Police;
- Relevant regulatory or professional body.

31. Training

Relevant staff should receive guidance on:

- Complaint handling;
- Safeguarding triage;
- Investigations;
- Confidentiality;
- Equality and reasonable adjustments;
- Record keeping;
- Outcome writing;
- Managing appeals.

32. Related Policies

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Grievance Policy;
- Disciplinary Policy;
- Employee Code of Conduct;
- Whistleblowing Policy;
- Equality, Diversity and Inclusion Policy;
- Data Protection, Privacy and Information Security Policy;
- Health and Safety Policy;
- Behaviour, Relationships and Anti-Bullying Policy;
- Learner Transportation Policy.

33. Monitoring and Review

This policy will be reviewed:

- Annually;
- Following significant complaints;
- Following changes to legislation or guidance;
- Where monitoring identifies recurring issues;
- Following recommendations from commissioners or auditors.