COMPLAINTS POLICY

ORGANISATION	SKAPE North East Ltd	POLICY REFERENCE	P13
UPDATED	12 November 2026	NEXT SCHEDULED REVIEW	12 November 2027
POLICY OWNER	Centre Manager / Administrative Lead	RELATED POLICIES	Safeguarding; Confidentiality; Whistleblowing; GDPR

01 INTRODUCTION

We believe that SKAPE provides a good education for all our children and young people, and that staff work hard to build positive relationships with parents/carers, commissioning schools and Local Authorities. This policy sets out how SKAPE will respond to concerns and complaints about the facilities or services we provide.

02 SCOPE OF POLICY

This complaints procedure is not limited to parents or carers of children and young people attending SKAPE. Any person, including members of the public, may make a complaint to SKAPE about facilities or services that we provide. We will use this complaints procedure to consider those complaints.

03 CONCERNS AND COMPLAINTS

A concern may be defined as ‘an expression of worry or doubt over an issue considered to be important for which reassurances are sought’.

A complaint may be defined as ‘an expression of dissatisfaction however made, about actions or a lack of action’.

It is in everyone’s interest that concerns and complaints are resolved at the earliest opportunity. Many issues may be resolved informally, without the need to use the formal stages of the complaints procedure. SKAPE takes concerns seriously and will make every effort to resolve the matter as quickly as possible.

If you have difficulty discussing a concern with a particular member of staff, we will respect your views. In these cases, the Centre Manager will refer you to another member of staff. Similarly, if the member of staff directly involved feels unable to deal with a concern, the Centre Manager will refer you to another staff member. The member of staff may be more senior, but doesn’t have to be. The ability to consider the concern objectively and impartially is more important.

We understand, however, that there are occasions when people would like to raise their concerns formally. In this case, SKAPE will attempt to resolve the issue internally, through the stages outlined within this complaints procedure.

04 HOW TO RAISE A COMPLAINT

A concern can be raised in person, in writing or by telephone. It may also be raised by a third party acting on behalf of a complainant, as long as they have appropriate consent to do so.

Concerns should be raised with either a member of staff or the Centre Manager. If the issue remains unresolved, the next step is to raise a formal complaint.

Complaints should be marked as Private and Confidential if being made to the SKAPE Reception/Administration staff. Complaints can be made to any member of staff and will be acted on quickly.

For ease of use, a complaint form is included in Appendix 1. If you require help in completing this form, please contact the Centre office where help will be provided, or advice given for how to get external help (such as from the Citizens Advice).

We will make reasonable adjustments where required so that people can access and take part in this procedure. This may include help to explain or write down a complaint, accessible information, interpretation support and suitable meeting arrangements. Students can ask a trusted adult to help them raise a concern. The complaint form is available to help and is not a requirement for a complaint to be considered.

Anonymous complaints

Anonymous complaints will be considered. The Centre Manager, or an uninvolved Director where appropriate, will decide what enquiries are possible, taking account of the seriousness of the concern, any risk of harm and the information available. Anonymity may limit the investigation or feedback, but must not prevent necessary safeguarding action.

05 TIMESCALES AND RELATED INVESTIGATIONS

You must raise the complaint within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this timeframe if exceptional circumstances apply. This timeframe does not prevent safeguarding concerns, protected disclosures or matters governed by separate legal procedures from being raised and acted on.

Complaints received outside of term time

We will consider complaints received when the Centre is closed to have been received on the next working day that SKAPE is open. This applies to routine complaint timescales only. Safeguarding or urgent safety concerns must not wait for the Centre to reopen; contact the relevant safeguarding service or police where immediate help is needed. Call 999 if someone is in immediate danger.

If another body, such as the police, local authority, safeguarding service or a tribunal, is investigating, this may affect our complaint investigation or timescales. We will explain any necessary pause, its reasons and how the complainant will be kept informed. Safeguarding action and any separate legal duties or deadlines will continue.

If legal proceedings begin, SKAPE will consider whether any part of the complaint procedure needs to pause, taking advice where necessary. A pause will not automatically apply to unrelated issues and must not delay safeguarding action or compliance with separate legal duties.

Withdrawing a complaint

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing. Withdrawal does not prevent SKAPE from taking necessary safeguarding action or addressing a serious safety or staff conduct concern.

06 MATTERS COVERED BY OTHER PROCEDURES

This procedure covers all complaints about any provision of facilities or services by SKAPE other than complaints that are dealt with under other statutory procedures, including those listed below:

Matters likely to require a Child Protection Investigation

Complaints or concerns that indicate a child may be at risk of harm must be reported immediately under SKAPE's Safeguarding Policy and relevant safeguarding procedures. SKAPE's DSL or deputy DSL will liaise with the commissioning school's DSL or local authority safeguarding contact where appropriate and safe. We will follow our own Safeguarding Policy alongside the commissioner's relevant procedures. Necessary action or referrals to children's social care, the LADO or police must not wait for a complaint investigation or the commissioner's response. If the concern involves the DSL, use an uninvolved senior person or the appropriate external safeguarding route.

Breakdown / failure of the student placement at SKAPE

Concerns about a student placement should normally be discussed through the placement review process involving SKAPE, the parent/carer where appropriate, and the commissioning school or Local Authority. Where a complainant is dissatisfied with an action or decision taken by SKAPE, they may use this complaints procedure. Decisions that are the responsibility of the commissioner should be raised with the relevant commissioning school or Local Authority through its own procedures.

Whistleblowing

Concerns about wrongdoing in the public interest should be raised under the Whistleblowing Policy. This is available to everyone within its scope, including employees, workers, agency staff, volunteers and contractors. Statutory protections depend on the person's working arrangements and the disclosure meeting the legal conditions.

Volunteers can use the Whistleblowing Policy for concerns about wrongdoing, the Safeguarding Policy for safeguarding concerns and this Complaints Policy for general complaints about SKAPE's services.

Staff grievances

Personal employment complaints will normally be dealt with under the staff grievance procedure. Concerns about wrongdoing in the public interest follow the Whistleblowing Policy; safeguarding concerns and allegations about staff follow the appropriate safeguarding procedure.

Data protection concerns and information rights

Requests to access personal information, data-protection complaints and actual or suspected data breaches follow the GDPR Policy. Staff must pass them promptly to the data protection lead. These matters do not have to complete the general complaints stages, and this policy does not change their legal deadlines or the right to contact the Information Commissioner's Office.

Staff conduct

Complaints about staff conduct will be considered under SKAPE's relevant internal procedures where appropriate. Complainants will not be informed of confidential disciplinary action taken against a member of staff, but will be told that the matter has been addressed as far as it is appropriate to do so.

Complaints about services provided by other organisations using SKAPE premises or facilities

Providers should have their own complaints procedure to deal with complaints. Please contact them directly.

National Curriculum - content

Students attending SKAPE will undertake an initial assessment and follow an individual programme of learning based on their needs, starting points and placement aims. Concerns about teaching, curriculum content or a student's programme should initially be raised with the Centre Manager. Where the concern relates to the commissioning decision or agreed placement arrangements, the commissioning school or Local Authority should also be involved.

07 STAGE 1 FORMAL COMPLAINT

Formal complaints must be made to the Centre Manager (unless they are about the Centre Manager) via the Centre's reception. This may be done in person, in writing (preferably on the Complaint Form), or by telephone.

The Centre Manager will record the date the complaint is received and will acknowledge receipt of the complaint in writing (either by letter or email) within 5 working days.

Within this response, the Centre Manager will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the complainant would like to see. The Centre Manager can consider whether a face-to-face meeting is the most appropriate way of doing this.

Where the Centre Manager is not involved in the complaint, they may delegate the investigation to another suitably skilled person but remain responsible for the Stage 1 decision.

During the investigation, the Centre Manager (or investigator) will:

- If necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish.
- Keep a written record of any meetings/interviews in relation to their investigation.

At the conclusion of their investigation, the Centre Manager will provide a formal written response within 15 working days of the date of receipt of the complaint.

If the Centre Manager is unable to meet this deadline, they will provide the complainant with an update and revised response date.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions SKAPE will take to resolve the complaint.

The Centre Manager will advise the complainant of how to escalate their complaint should they remain dissatisfied with the outcome of Stage 1.

If the complaint is about the Centre Manager, an uninvolved Director will take responsibility for Stage 1 and arrange a suitably skilled, impartial investigator where needed. The Centre Manager must not select or oversee their investigator or decide the complaint about themselves.

Complaints about the Centre Manager should be addressed privately to an uninvolved Director through reception or administration. If a complaint involves a Director, it must be handled by someone not involved in the concern. If no uninvolved Director is available, SKAPE will seek help from the commissioner or an independent professional to arrange impartial handling. The people complained about must not choose or oversee their investigator.

If the complaint is:

- jointly about the Manager and Senior Teacher or
- jointly about the majority of or the entire staff

Stage 1 will be considered by an independent investigator arranged by an uninvolved Director, or through the independent arrangements described above where no uninvolved Director is available. This may be a suitably experienced external professional. At the conclusion of the investigation, a formal written response will explain the findings and decision.

08 STAGE 2 INDEPENDENT REVIEW

If the complainant is dissatisfied with the outcome at Stage 1 and wishes to take the matter further, they can escalate the complaint to Stage 2 - an independent review. This will normally be considered by three impartial individuals who have not previously been involved in the complaint. Appropriate independent representatives may include individuals from a Local Authority or other suitably experienced professionals. This is the final stage of SKAPE's internal complaints procedure.

If a complaint is received against the Centre Manager and the complainant requests that it is escalated to Stage 2, the same procedure as above will be implemented, with the use of independent reviewers.

A request to escalate to Stage 2 must be made to the Administrative Lead of SKAPE, via the Centre's reception, within 15 working days of receipt of the Stage 1 response.

The Administrative Lead will record the date the Stage 2 request is received and acknowledge receipt in writing (either by letter or email) within 5 working days.

Requests received outside of this timeframe will only be considered if exceptional circumstances apply.

The Administrative Lead will write to the complainant to inform them of the arrangements for the review. They will aim to convene a meeting within 15 working days of receipt of the Stage 2 request. If this is not possible, the Administrative Lead will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Administrator will decide when to hold the meeting. It will then proceed in the complainant’s absence on the basis of written submissions from both parties.

Alternatively, an entirely independent committee may be convened to hear the complaint at Stage 2. This may include the involvement of Local Authority staff.

The committee will decide whether to deal with the complaint by inviting parties to a meeting or through written representations, but in making their decision they will be sensitive to the complainant’s needs.

If the complainant is invited to attend the meeting, they may bring someone along to provide support. This can be a relative or friend. Generally, we do not encourage either party to bring legal representatives to the committee meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a SKAPE employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

Complaints about staff conduct will be referred to the appropriate safeguarding, allegations or employment procedure. SKAPE will explain which route applies and provide appropriate feedback about the concern. Confidential disciplinary details will not be shared. Any remaining complaint about SKAPE's services can be considered under this procedure where appropriate.

At least 5 working days before the meeting, the Administrative Lead will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the arrangements are reasonable for all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the committee at least 3 working days before the meeting.

Relevant written material will be circulated at least 2 working days before the meeting, with any necessary redactions to protect other people's information. The committee will consider relevant evidence, including recordings, case by case, taking account of reliability, fairness, privacy, how it was obtained and any applicable legal requirements.

The committee will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the procedure.

The meeting will be held in private. Requests to record a meeting will be considered case by case, including where recording may be a reasonable adjustment. Arrangements will take account of accessibility, confidentiality and other people's privacy. Any agreed recording arrangements, including access, storage and sharing, will be recorded in the minutes.

The committee will consider the complaint and all the evidence presented. The committee can:

- uphold the complaint in whole or in part
- dismiss the complaint in whole or in part.

If the complaint is upheld in whole or in part, the committee will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the Centre's systems or procedures to prevent similar issues in the future.

The Chair of the Committee will provide the complainant and SKAPE with a full explanation of the decision and the reason(s) for it, in writing, within 15 working days.

The letter to the complainant will explain that Stage 2 concludes SKAPE's internal complaints procedure and will signpost any relevant external routes, depending on the nature of the complaint.

If the complaint is:

- jointly about the Centre Manager and Senior Teacher or
- the majority of the staff

Stage 2 will be heard by an independent committee.

09 NEXT STEPS

A complainant may also raise placement-related concerns with the commissioning school or local authority, as appropriate to its responsibilities. This may be particularly relevant if concerns about SKAPE remain unresolved after the internal procedure. Urgent safeguarding concerns, lawful whistleblowing disclosures and data-protection rights do not have to wait for this complaints procedure to finish.

Depending on the nature of the concern, a complainant may also contact an appropriate external body. This may include the Department for Education (DfE), the relevant Local Authority, safeguarding services, the Information Commissioner's Office or another relevant organisation. The appropriate route will depend upon the nature of the complaint and the responsibilities of the organisation concerned.

The Department for Education can be contacted for general enquiries or to raise a complaint through its online contact service, or by telephone on 0370 000 2288. The DfE school complaints service specifically applies to maintained schools and academies; SKAPE is a non-registered alternative provision, so the DfE is not presented in this policy as a further appeal stage for complaints about SKAPE.

10 ROLES AND RESPONSIBILITIES

Complainant

The complainant will receive a more effective response to the complaint if they:

- explain the complaint in full as early as possible
- co-operate with SKAPE in seeking a solution to the complaint
- respond promptly to requests for information or meetings or in agreeing the details of the complaint
- ask for assistance as needed
- treat all those involved in the complaint with respect
- respect other people's privacy and avoid sharing their confidential information publicly. This does not prevent lawful external reporting or seeking independent advice.

Investigator

The investigator's role is to establish the facts relevant to the complaint by:

- providing a comprehensive, open, transparent and fair consideration of the complaint through:
- sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved
- interviewing staff and children/young people and other people relevant to the complaint
- consideration of records and other relevant information
- analysing information
- liaising with the complainant and the complaints coordinator as appropriate to clarify what the complainant feels would put things right.

The investigator should:

- conduct interviews with an open mind and be prepared to persist in the questioning
- keep notes of interviews or arrange for an independent note-taker to record minutes of the meeting
- ensure that any papers produced during the investigation are kept securely pending any appeal
- be mindful of the timescales to respond
- prepare a comprehensive report for the Centre Manager or Complaints Committee that sets out the facts, identifies solutions and recommends courses of action to resolve problems.

The Centre Manager or Complaints Committee will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details.

Complaints coordinator — Centre Manager or another member of staff providing administrative support

The complaints coordinator should:

- ensure that the complainant is fully updated at each stage of the procedure
- liaise with staff members, Centre Manager, Administrative Lead and Local Authorities (if appropriate) to ensure the smooth running of the complaints procedure
- be aware of issues regarding:
- sharing third party information

- additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person
- keep records.

The Administrative Lead

The Administrative Lead is the person assigned to administer the complaint and act as the contact point for the complainant and committee. They must not be a person complained about. Their responsibilities are to:

- ensure that all people involved in the complaints procedure are treated fairly and that relevant legal requirements are considered, including the Equality Act 2010, Data Protection Act 2018 and UK GDPR, where applicable
- set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible
- collate any written material relevant to the complaint (for example, Stage 1 paperwork and submissions from SKAPE and the complainant) and send it to the parties in advance of the meeting within an agreed timescale
- record the proceedings
- circulate the minutes of the meeting
- notify all parties of the committee's decision.

Committee Chair

The committee's chair, who is nominated in advance of the complaint meeting, should ensure that:

- both parties are asked (via the Administrative Lead) to provide any additional information relating to the complaint by a specified date in advance of the meeting
- the meeting is conducted in an informal manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy
- complainants who may not be used to speaking at such a meeting are put at ease. This is particularly important if the complainant is a child/young person
- the remit of the committee is explained to the complainant
- written material is seen by everyone in attendance, provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR.

If a new issue arises it would be useful to give everyone the opportunity to consider and comment upon it; this may require a short adjournment of the meeting

- both the complainant and SKAPE are given the opportunity to make their case and seek clarification, either through written submissions ahead of the meeting or verbally in the meeting itself
- the issues are addressed
- key findings of fact are made
- the committee is open-minded and acts independently
- no member of the committee has an external interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- the meeting is minuted
- they liaise with the Administrative Lead.

Committee Member

Committee members should be aware that:

- the meeting must be independent and impartial, and should be seen to be so
- the aim of the meeting should be to resolve the complaint and achieve reconciliation between SKAPE and the complainant

We recognise that the complainant might not be satisfied with the outcome if the meeting does not find in their favour. It may only be possible to establish the facts and make recommendations.

- many complainants will feel nervous and inhibited in a formal setting

Parents/carers often feel emotional when discussing an issue that affects their child.

- extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting

Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated.

The committee should respect the views of the child/young person and give them equal consideration to those of adults.

If the child/young person is the complainant, the committee should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the committee should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend.

However, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the committee considers is not in the child's best interests.

The welfare of the child/young person is paramount.

11 CONFIDENTIALITY AND RECORDS

Complaint information will be shared only with those who need it to investigate, respond or safeguard someone. Staff must follow the Confidentiality and GDPR policies. Records of the complaint, enquiries, decisions, outcome and actions must be kept securely, retained only for as long as needed under the agreed retention arrangements and disposed of securely. Information about other people will be protected, including when documents or outcomes are shared.

Confidentiality cannot be guaranteed absolutely where sharing is necessary for a lawful and fair response. It must not prevent a lawful protected disclosure, reporting a crime, contacting an appropriate external body or obtaining legal or trade union advice. Students and adults must not be subjected to retaliation or unfair treatment for raising a concern or supporting another person's complaint.

12 MONITORING AND REVIEW

This policy is reviewed annually. The next scheduled review date is shown at the start of this policy.

13 DOCUMENT REVISION HISTORY

DATE	CHANGE	APPROVAL	REV.
10/08/2023	Initial policy	K. Watson	01
27/12/2023	Updated for DCC compliance	K. Watson	02
31/08/2024	Policy review	K. Watson	03
01/09/2025	Policy review	K. Watson	04
24/09/2026	Policy review and update	K. Watson	05
12/11/2026	SKAPE branding and format standardised; impartial handling, reporting routes, safeguarding, confidentiality, records and accessible complaint handling aligned with related policies.	L. James	06

14 APPENDIX 1 COMPLAINT FORM

Please return this form to the Centre Manager through reception or administration. If your complaint concerns the Centre Manager, address it privately to an uninvolved Director. If it concerns a Director, or there is no uninvolved Director, use the impartial handling arrangements in Stage 1. Receipt will be acknowledged and the next steps explained. You can also raise a complaint verbally or ask for help completing the form.

Your name

Student's name if relevant

Your relationship to the student if relevant

Address and postcode

Daytime telephone number

Evening telephone number

Please give details of your complaint, including whether you have spoken to anybody at SKAPE about it

Complaint form continued

What actions do you feel might resolve the problem at this stage?

Are you attaching any paperwork? If so, please give details.

Signature

Date

Official use

Date acknowledgement sent

By whom

Complaint referred to

Date