

EMPOWERING FUTURES ALTERNATIVE PROVISION

COMPLAINTS POLICY (CHILDREN, YOUNG PEOPLE & ADULT LEARNERS)

Policy Name	Complaints
Site	Birmingham
Version	1.0
Approved By	Director / DSL
Date Reviewed & Confirmed	18 January 2026
Next Review Due	January 2027

1. POLICY STATEMENT

Empowering Futures Alternative Provision (EFAP) is committed to ensuring that all learners, parents/carers, adult learners, staff, partner agencies and stakeholders can raise concerns or complaints openly, safely and without disadvantage.

This policy establishes:

- A **3-stage complaints process** for the **Alternative Provision (11–18)**
- A **4-stage complaints process** for **Adult Learning (18+)**
- A transparent, fair and trauma-informed approach
- Clear escalation routes for safeguarding concerns
- Compliance with Local Authority frameworks and awarding-body requirements

EFAP welcomes complaints as an opportunity to improve quality, strengthen safeguarding and enhance learner experience.

2. SCOPE OF THE POLICY

This policy applies to:

- Children and young people (11–18) attending EFAP
- Adult learners (18+) enrolled on EFAP evening/weekend or online courses
- Parents and carers
- Staff, volunteers, tutors, assessors and contractors
- Local Authorities, schools and commissioning bodies
- Online and remote learning participants
- External agencies and community partners

Complaints may relate to:

- Teaching and learning
- Staff conduct
- Safeguarding
- Assessment or qualification decisions
- Online delivery
- Vocational training environments (beauty, nails, sports, fitness, customer service)
- Equality, discrimination or bullying
- Administrative processes

3. DEFINITIONS

Complaint

Any expression of dissatisfaction requiring a response.

Concern

A low-level issue that can often be resolved informally.

Safeguarding Allegation

Any claim that a member of staff, volunteer or contractor has harmed, abused or placed a learner at risk.

Appeal

A challenge to an assessment or qualification decision (addressed through awarding body processes).

4. PRINCIPLES

EFAP's complaint management is based on:

- Fairness
- Transparency
- Accessibility
- Trauma-informed practice
- Timeliness
- Non-retaliation
- Confidentiality (in line with GDPR)
- Clear escalation routes
- Right to external review

No complainant will be disadvantaged or penalised for raising a concern in good faith.

5. SAFEGUARDING COMPLAINTS

Any complaint involving **harm, abuse, neglect, exploitation, staff conduct, discriminatory behaviour, or unsafe practice** MUST be treated as a safeguarding allegation.

Safeguarding complaints follow this route:

1. **Report immediately to:**
 - Lead DSL – Rhean White**
 - DSL – Rena Sparks**
2. DSL conducts risk assessment
3. Inform safeguarding partners where required
4. If the allegation involves a member of staff:
 - DSL consults with Local Authority Designated Officer (LADO)
 - Staff member may be suspended pending investigation

This safeguarding pathway **overrides** the standard complaints stages.

6. COMPLAINTS PROCESS FOR ALTERNATIVE PROVISION (11–18)

3-Stage Model (A)

This applies to parents, carers, schools, LAs, and young people.

Stage 1: Informal Resolution

The complainant should raise the issue with:

- The relevant Tutor
- The Centre Manager
- DSL if appropriate

EFAP will:

- Acknowledge within **2 working days**
- Attempt resolution within **5 working days**
- Offer a meeting if needed

If unresolved, the complainant may proceed to Stage 2.

Stage 2: Formal Complaint

Complaints must be submitted in writing to:

Director – Rhean White

(Or to DSL if conflict of interest is present)

EFAP will:

- Acknowledge within **2 working days**
- Appoint an investigator (not previously involved)
- Provide a written outcome within **10 working days**, unless complexity requires extension

Outcome may include:

- Findings summary
- Actions to be taken
- Staff training or support
- Policy amendments
- Monitoring arrangements

If dissatisfied, the complainant may proceed to Stage 3.

Stage 3: Independent Review Panel

The panel will include:

- A Senior Manager not involved in Stages 1–2
- A DSL or Safeguarding Representative
- **An external, independent member** (mandatory)

The panel will:

- Review documentation
- Hear from relevant parties
- Consider fairness, process and proportionality

A written decision will be issued within **20 working days** and represents the **final stage** for AP learners.

Where complaints relate to LA commissioning, the Local Authority may also review the case.

7. COMPLAINTS PROCESS FOR ADULT LEARNING (18+)

4-Stage Model (B)

This applies to adult learners, employers, and external partners.

Stage 1: Informal Resolution

Raised with the Tutor, Assessor or Centre Manager.

EFAP responds within:

- **2 working days** to acknowledge
- **5 working days** to resolve

Stage 2: Formal Complaint

Submitted to:

Director – Rhean White

EFAP will:

- Acknowledge within **2 working days**
- Conduct a formal investigation
- Respond within **10 working days**

Stage 3: Independent Review Panel

Panel includes:

- Senior Manager
- Safeguarding Representative
- **External independent member**

Provides:

- Review of fairness
- Consideration of evidence
- Written decision within **20 working days**

Stage 4: External Escalation (Adult Learning Only)

If the learner remains dissatisfied, they may escalate to:

Awarding Body (depending on qualification)

- Focus Awards
- ASDAN

- Other awarding organisations as applicable

If publicly funded (ESFA regulated):

Education & Skills Funding Agency (ESFA) – Complaints Team

If safeguarding-related:

Local Authority Adult Safeguarding Team
Police (if criminal)

If data protection related:

Information Commissioner’s Office (ICO)

EFAP will provide guidance on the correct escalation route.

8. COMPLAINTS ABOUT ONLINE / REMOTE LEARNING

Complaints may involve:

- Accessibility issues
- Tutor conduct online
- Breaches of online safety
- Failure of platform or resources
- Abuse, harassment, or cyberbullying
- Recording without consent

Handled in line with the appropriate pathway (AP or adult).

Evidence such as screenshots or chat logs may be collected.

9. COMPLAINTS ABOUT VOCATIONAL TRAINING

EFAP delivers practical programmes in:

- Creative Media
- Beauty
- Nails

- Sports
- Fitness
- Customer Service

Complaints may relate to:

- Practical teaching quality
- Equipment or salon environments
- Health & safety
- Assessment decisions
- Placement or work-related experience

These will be managed using the appropriate AP or adult learning complaint process.

Where assessment outcomes are disputed, awarding body appeal procedures may be used.

10. COMPLAINTS INVOLVING STAFF

If a complaint concerns:

- Staff conduct
- Professional boundaries
- Discrimination
- Harassment
- Abuse
- Breach of policy
- Conflict of interest

EFAP will:

- Escalate directly to DSL & Director
- Take immediate safeguarding action where needed
- Follow disciplinary procedures
- Involve LADO if allegation involves harm to a child

11. ACCESSIBILITY & SUPPORT

Complainants may:

- Submit complaints verbally or in writing
- Request assisted support (e.g., scribe, advocate)

- Request translation or interpretation
- Ask for reasonable adjustments due to SEND, literacy or disability

Young people may be supported by:

- Parent/carer
- Social worker
- Advocate
- Trusted adult

12. TIMEFRAMES

Unless otherwise stated:

- Acknowledgement: **2 working days**
- Informal resolution: **5 working days**
- Formal investigation outcome: **10 working days**
- Independent Panel decision: **20 working days**

Extensions may be required for complex multi-agency cases.

13. RECORD KEEPING & GDPR

EFAP will:

- Record all complaint stages securely
- Store data in accordance with UK GDPR and Data Protection Act 2018
- Restrict access to authorised staff only
- Retain complaint records for:
 - **AP learners:** 7 years
 - **Adult learners:** minimum awarding body requirement
 - **Safeguarding complaints:** in line with statutory retention

Complaints may be anonymised for service improvement.

14. CONFLICTS OF INTEREST

EFAP recognises that, due to the nature of small AP provision, staff may:

- Teach relatives
- Deliver training to acquaintances
- Work alongside external contractors in dual roles

Where any conflict of interest exists:

- Staff must declare it
- Another staff member must oversee decisions
- Independent panel escalation may be used

15. MONITORING & QUALITY ASSURANCE

EFAP reviews:

- Complaints volume
- Themes and patterns
- Response times
- Outcomes
- Safeguarding links
- Accessibility issues
- Equality considerations

Findings inform staff training, policy updates and operational improvements.

16. POLICY REVIEW

This policy will be reviewed:

- Annually
- After major complaints
- In line with awarding body audits
- Following legislative updates
- After Local Authority or Ofsted feedback

Approved by:

Rhean White – Director & Lead DSL
Empowering Futures Alternative Provision