

The Harington Scheme

Complaints Policy and Procedure

1. Purpose of the Policy

The purpose of this policy is to set out the procedures by which Harington manages and responds to complaints from parents, carers, young people, commissioners, and other stakeholders. Harington is committed to ensuring that concerns and complaints are taken seriously and handled in a fair, transparent, and timely manner. This policy aims to support a culture of openness and continuous improvement, ensuring that complainants are treated with dignity and respect and that learning from complaints informs the ongoing development of services. The policy is published on the Harington website and is available in alternative formats on request.

2. Aims

Harington aims to ensure that all complaints are handled impartially and without unnecessary conflict. Complaints will be investigated thoroughly and proportionately, with all issues raised considered carefully and responded to clearly. Complainants will be kept informed throughout the process, and their confidentiality will be respected wherever possible. Harington will make reasonable adjustments to ensure that individuals with additional needs are able to access the complaints process. Wherever possible, concerns will be resolved at an early stage, and feedback from complaints will be used to inform service improvement and organisational learning.

3. Legal and Regulatory Framework

This policy has been developed with regard to relevant national guidance and legislation, including the SEND Code of Practice (2015), the Equality Act 2010, and the UK General Data Protection Regulation alongside the Data Protection Act 2018. Harington also recognises its responsibilities under any relevant Education and Skills Funding Agency requirements where provision is publicly funded. As An Independent Training Provider supporting young people with special educational needs and disabilities, Harington is committed to ensuring that its

complaints procedures are accessible, proportionate, and appropriate to the needs of its students and stakeholders.

4. Scope of the Policy

This policy applies to complaints made by parents, carers, young people themselves, commissioners, and members of the public. It covers concerns about the quality and delivery of provision, communication, decision-making, support for young people with SEND, and the conduct of staff where this is not subject to another formal procedure. The policy does not apply to safeguarding concerns, which must be reported and managed in accordance with safeguarding procedures, nor does it apply to whistleblowing, staff grievances, admissions decisions, or statutory SEND processes such as Education, Health and Care assessments. It also does not apply to decisions relating to the temporary suspension of a student or the ending of a placement, which are managed under separate organisational procedures. Where a complaint overlaps with another process, Harington will determine the most appropriate route to ensure the matter is addressed effectively.

5. Definitions

A concern is defined as an expression of worry or doubt about an issue for which reassurance or clarification is sought. A complaint is defined as an expression of dissatisfaction, however made, about actions taken or a lack of action. Harington recognises that many concerns can be resolved quickly and informally and therefore encourages individuals to raise issues at the earliest opportunity.

6. Accessibility and Support

Harington recognises that some individuals may require additional support to access the complaints process. Complaints may be made verbally, in writing, or through a representative or advocate. Information about the complaints process can be provided in alternative formats, such as Easy Read, upon request. Staff will provide support where appropriate to enable individuals to express their concerns, and reasonable adjustments will be made in accordance with the Equality Act 2010. Young people are able to raise concerns or complaints directly, either independently or with support, in line with Harington's person-centred approach.

7. Principles for Investigation

Policy Title: Complaints Policy

Date Approved: July 2026

Review Date: July 2027

When investigating a complaint, Harington will seek to establish what has happened, who was involved, and what outcome the complainant is seeking. Investigations will be conducted in a fair and proportionate manner and will be carried out by an appropriate person who has not been directly involved in the matter where possible. The process may involve reviewing documentation, speaking to relevant individuals, and holding meetings where necessary. Harington will aim to complete investigations within agreed timescales and will keep the complainant informed of progress throughout.

8. Timescales

Complaints should normally be raised within three months of the issue occurring, although Harington may consider complaints outside of this timeframe where there are valid reasons for the delay and where a fair investigation remains possible. All complaints will be acknowledged within five working days of receipt. Each stage of the complaints procedure has indicative timescales, and Harington will aim to adhere to these wherever possible. Where additional time is required, the complainant will be informed of the reasons and provided with a revised timeframe.

9. Stages of the Complaints Procedure

At **Stage 1**, concerns should be raised informally with the relevant member of staff, such as a teacher or manager. In most cases, concerns can be resolved quickly through discussion, clarification, and agreement on any necessary actions. Harington encourages early resolution at this stage wherever possible.

If the concern is not resolved informally, the complainant may proceed to **Stage 2** by making a formal complaint. This should normally be submitted in writing to the CEO/Principal, although support will be provided where needed. The complaint should set out the nature of the concern, any steps already taken to resolve it, and the outcome being sought. Upon receipt, the complaint will be acknowledged, and an investigator will be appointed. The investigation may include meetings with the complainant and others involved, as well as a review of relevant evidence. A written response will normally be provided within twenty working days, setting out the findings and any actions to be taken.

If the complainant remains dissatisfied, they may request that the complaint be considered at **Stage 3**. At this stage, the complaint will be reviewed by a Complaints Panel consisting of at least three individuals, including at least one independent member. The complainant will be

invited to attend the panel meeting and may be accompanied by a supporter or advocate. The panel will consider all evidence presented and may ask questions to clarify the issues. Following the meeting, the panel will issue a written decision, normally within twenty working days, setting out its findings and any recommendations. This represents the final stage of the internal complaints process.

10. Complaints About Senior Staff or Trustees

Where a complaint concerns the CEO/Principal, it should be directed to the Chair of Trustees. Complaints about the Chair of Trustees will be handled by another Trustee or by an independent person where appropriate. In such cases, it may be appropriate for the complaint to proceed directly to the panel stage to ensure independence and fairness.

11. Mediation and Early Resolution

Harington recognises that not all complaints require formal investigation and that in some cases issues can be resolved more effectively through discussion. At any stage of the process, Harington may offer mediation or a facilitated meeting to support a constructive resolution. Participation in mediation is voluntary and does not prevent the complainant from continuing with the formal complaints process if the matter remains unresolved.

12. Unreasonably Persistent or Abusive Complaints

In a small number of cases, a complainant's behaviour may be considered unreasonable, for example where there is repeated contact about the same issue without new evidence, or where communication becomes abusive or threatening. In such circumstances, Harington may take proportionate steps to manage contact, including limiting the frequency or method of communication. Any such decision will be clearly communicated in writing and will not prevent new complaints from being considered. Harington will always ensure that safeguarding concerns are appropriately addressed.

13. Record Keeping and Confidentiality

Harington will keep a written record of all complaints, including details of actions taken at each stage and the final outcome. Records will be stored securely in accordance with data protection

legislation and will normally be retained for a minimum of six years. Information will be shared only with those involved in the investigation unless disclosure is required by law.

14. Monitoring and Review

The Trustees are responsible for monitoring the effectiveness of the complaints procedure. They will receive regular reports on the number and nature of complaints and will consider any trends or recurring issues. This information will be used to inform service improvements and ensure that the organisation continues to respond effectively to feedback. The policy will be reviewed at least every two years, or sooner if required.

15. External Escalation

If the complainant remains dissatisfied after the internal complaints process has been exhausted, they may refer the matter to the Education and Skills Funding Agency where the provision is funded through ESFA, or to the relevant Local Authority where the placement has been commissioned. These bodies will not normally re-investigate the complaint but will review whether Harington has followed its procedures correctly.

16. Related Policies

This policy should be read alongside other relevant Harington policies, including safeguarding, SEND, data protection, and whistleblowing procedures.