



OUTREACH • BARN • FARM • POST 16

Complaints Policy

Policy Note

	<p>For the purposes of this policy, Orchard Therapeutic Farm (OTF), Orchard Therapeutic Outreach (OTO), Orchard Therapeutic Barn (OTB) and Orchard Therapeutic Active (OTA) will together be referred to as “the Services”</p>
	<p>This policy applies to all employees, volunteers, trustees, and contractors of the Services, as well as anyone representing Orchard Therapeutic Farm, Orchard Therapeutic Outreach, Orchard Therapeutic Barn and Orchard Therapeutic Active in an official capacity.</p>

Key Principles

		Young Person’s Voice	How this applies to Absconding (what The Services will do)
		I feel safe to say when something is wrong.	Create a culture where concerns are welcomed; ensure no young person is disadvantaged for raising a complaint; respond calmly and without defensiveness.
		I am listened to seriously.	Take all complaints seriously; acknowledge within set timescales; investigate fairly and without bias.

I understand how to make a complaint.	Explain the complaints process in accessible language; provide visual guides or easy-read versions where needed; offer support to complete forms.
I can ask for help if I need it.	Offer advocacy support; allow a trusted adult to help; make reasonable adjustments for SEND or communication needs.
My views are respected, even if adults disagree.	Record the young person's account accurately; reflect their words in documentation; explain decisions clearly and respectfully.
I know what will happen next.	Clearly explain each stage of the process, timescales and possible outcomes; keep the complainant updated throughout.
I am treated fairly.	Ensure investigations are impartial; separate fact-finding from decision-making; avoid conflicts of interest.
My complaint is handled privately.	Store records securely; share information only on a need-to-know basis in line with UK GDPR and the Data Protection Act 2018.
I am not blamed for speaking up.	Promote a no-reprisal culture; monitor for any unintended consequences; intervene if any negative behaviour arises.
I can be involved in putting things right.	Where appropriate, use restorative approaches; involve the young person in agreed resolutions and future planning.

My feedback helps improve the service.	Analyse complaint trends termly; report themes to leadership; implement changes and monitor impact.
I can take my complaint further if I'm not satisfied.	Provide access to an independent panel; clearly explain escalation routes, including external bodies where appropriate.

This policy should be read in conjunction with our:

- Safeguarding & Child Protection Policy (including Managing Allegations and Children Missing Education)
- Whistleblowing Policy
- Behaviour Policy and Behaviour Support Plans (BSP)
- Equality, Diversity & Inclusion Policy (including Reasonable Adjustments under the Equality Act 2010)
- Data Protection & Information Sharing Policy (UK GDPR & Data Protection Act 2018)
- Attendance Policy
- Staff Code of Conduct
- Recruitment & Safer Recruitment Policy
- Governance & Quality Assurance Framework
- Records Management and Retention Policy

- This policy sets out the principles for managing concerns and complaints within The Services. It ensures that all complaints are handled fairly, proportionately and in a way that reflects our Thrive-informed ethos.
- **Welfare first:** The safety, wellbeing and dignity of young people remain paramount throughout any complaints process.
- **Thrive-informed practice:** We recognise that behaviour and communication are forms of expression. Complaints are handled with

curiosity, emotional awareness and a focus on relational repair, not blame.

- **Fairness and natural justice:** All parties are treated impartially. Decisions are based on evidence, and individuals are given the opportunity to respond.
- **Proportionality:** Responses are balanced and appropriate to the nature and seriousness of the complaint.
- **Timely resolution:** Concerns are addressed promptly to prevent escalation and reduce anxiety for those involved.
- **Clarity and transparency:** The complaints process is clearly explained, with defined stages, timescales and escalation routes.
- **Independence and accountability:** Where required, independent review mechanisms are available to ensure objectivity and public confidence.
- **Individualised approach:** Age, communication needs, SEND and vulnerability are considered, with reasonable adjustments made in line with the Equality Act 2010.
- **Effective leadership oversight:** A clear decision-maker (CEO) oversees formal complaints to ensure consistency and governance accountability.
- **Lawful and proportionate information sharing:** Personal data is managed securely and shared only where necessary, in accordance with UK GDPR and the Data Protection Act 2018.
- **Partnership working:** Parents/carers, referrers and relevant professionals are kept appropriately informed, and collaboration is encouraged where resolution requires joint action.
- **Learning and service improvement:** Complaints are recorded, reviewed and analysed to identify themes, strengthen systems and improve practice across The Services.

Legal/Statutory Framework

This policy is informed by relevant UK legislation and statutory guidance including the Children Act 1989 and 2004, the Education Act 2002, Working Together to Safeguard Children (latest version), and Keeping Children Safe in Education (latest version, where applicable to Alternative Provision). It is also guided by the Equality Act 2010, the Human Rights Act 1998, and the Data Protection Act 2018 together with the UK General Data Protection Regulation (UK GDPR).

The policy reflects the expectations of the Ofsted Inspection Framework for Alternative Provision and aligns with local safeguarding partnership procedures. It is underpinned by the principles of natural justice, proportionality, fairness and transparency, ensuring that complaints are managed in a lawful, impartial and accountable manner.

Complaints – Definition

A complaint is an expression of dissatisfaction, whether written or verbal, about the actions, decisions, omissions, conduct or quality of service provided by The Services.

A complaint may relate to a specific incident, an ongoing concern, a policy or procedure, or the behaviour of an individual member of staff.

Complaints differ from safeguarding concerns and whistleblowing disclosures, which are managed under separate policies.

Roles and Responsibilities

All Staff

- Listen respectfully and without defensiveness when concerns are raised.
- Attempt to resolve minor concerns informally where appropriate.
- Escalate complaints promptly to a senior leader if unresolved.
- Maintain confidentiality and professionalism.
- Record concerns accurately and factually.
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Senior Leadership Team (SLT)

- Support early resolution at Stage 1 where appropriate.
- Ensure complaints are logged and handled within timescales.
- Conduct or delegate investigations in a fair and impartial manner.
- Ensure appropriate communication with parents/carers and professionals.
- Monitor patterns or themes arising from complaints.

Chief Executive Officer (CEO)

- Hold final decision-making authority at Stage 2.
- Review investigation findings objectively.
- Ensure proportionality and fairness in outcomes.

- Ensure governance oversight and learning from complaints.
- Refer complaints concerning the CEO directly to an Independent Panel.

Independent Panel (Stage 3)

- Provide impartial review of complaints escalated beyond Stage 2.
- Ensure no prior involvement in the matter under review.
- Make decisions based on evidence presented.
- Issue a final written decision within agreed timescales.

Office / Administration

- Log complaints in the Complaints Register.
- Record dates of acknowledgement and outcomes.
- Maintain secure storage of documentation.
- Track timescales and escalation deadlines.

Complaints Process Overview

Stage 1 – Informal Resolution

Concerns are raised directly with staff or a senior leader.

Aim: early resolution through discussion and clarification.

Stage 2 – Formal Investigation (CEO Review)

- Complaint submitted in writing.
- Acknowledged within 2 working days.
- Investigation conducted.
- Written outcome issued within 15 working days.
- CEO decision communicated clearly, including reasoning and next steps.

Stage 3 – Independent Panel

- Complainant may escalate within 10 working days of Stage 2 outcome.
- 2-person panel convened (minimum one independent member).
- Panel decision issued in writing within 5 working days of hearing.
- Decision is final within The Services.

If the complaint concerns the CEO, the panel will consist of two independent members and bypass Stage 2.

Recording, Review & Learning

- All complaints are recorded in the Complaints Register.
- Investigation documentation is stored securely.
- Themes are reviewed termly by the CEO.
- Patterns are analysed to improve practice and reduce recurrence.
- Outcomes may inform staff training, policy amendments or procedural changes.

Training and Awareness

All staff receive training on:

- Professional conduct
- Handling concerns and complaints
- Safeguarding differentiation
- Confidentiality and data protection
- Thrive-informed relational practice

This policy forms part of staff induction and annual policy review.

Equality, Diversity & Inclusion

The Services will make reasonable adjustments for individuals with SEND or communication needs and will ensure that complaints processes are accessible, proportionate and non-discriminatory in line with the Equality Act 2010.

Monitoring and Review

The CEO will review this policy annually and sooner if required by regulatory change or operational need.

The effectiveness of this policy will be monitored through:

- Complaints trend analysis
- Governance oversight
- External inspection feedback

This policy does not form part of any employee's contract of employment and may be amended at any time.

After Reading This Policy, You Should Be Able To:

- Understand what constitutes a complaint.
- Understand the stages of the complaints process.
- Understand your role in responding to concerns professionally.
- Understand how independence and fairness are maintained.

If clarification is required, staff should speak to their Line Manager or the CEO.



Ludivine Parmentier

Chief Executive Officer

