



Complaints and Concerns Procedure

Peopleton Brook Care Farm

Policy owner: Jake Payne, Business Manager

Approval date: 05/08/2026

Effective date: 01/09/2026

Next review: August 2027, or sooner if law, guidance, contracts or provision change

Plain-language commitment: Anyone may raise a concern without fear of disadvantage. Children, young people and adult participants may speak to any trusted member of staff and do not have to put an urgent concern in writing.

1. Purpose and principles

Peopleton Brook Care Farm (PBCF) welcomes feedback and aims to resolve concerns fairly, promptly and as close as possible to where they arose. Complaints are used to put matters right, learn, improve safety and strengthen the quality of alternative provision.

The process will be accessible, impartial, non-adversarial and proportionate. PBCF will listen to the complainant, the person affected and relevant staff; identify conflicts of interest; consider all material points; explain decisions and escalation routes; protect confidentiality; and make reasonable adjustments.

No person will be treated less favourably because they raised or supported a complaint in good faith. Raising a complaint does not prevent PBCF from taking immediate safeguarding, emergency, disciplinary, contractual or regulatory action where required.

2. Status and scope

PBCF is a non-school alternative learning provider. The commissioning school, academy, local authority or other placing body retains the legal responsibilities that attach to its role and the placement. This procedure governs complaints about PBCF's service, staff, decisions, acts or omissions; it does not transfer the commissioner's statutory decision-making duties to PBCF.

This procedure may be used by children and young people, adult participants, parents and carers, advocates, representatives, professionals, commissioners, visitors, contractors and members of the public. It covers provision on site, PBCF-arranged transport, visits, outreach and online or off-site conduct connected with the service.

The three-stage structure reflects established education complaints good practice and, where relevant, the safeguards in Part 7 of the Independent School Standards. PBCF does not rely on this wording to claim that it is a registered independent school or that school-only statutory routes apply to it.

3. What uses another route

PBCF will identify the correct route promptly. A matter may be recorded as a complaint while its urgent or specialist elements are handled separately.

Type of matter	Required route
Immediate danger or suspected crime	Call 999 for immediate danger or a crime in progress. Use 101 or the appropriate reporting route for non-emergencies.
Child safeguarding	Follow the Safeguarding and Child Protection Policy immediately. Notify the DSL and make referrals without waiting for the complaints process.
Adult safeguarding	Follow the Adult Safeguarding Policy and local safeguarding procedures immediately; seek consent where appropriate unless law or risk permits sharing without it.
Concern or allegation about an adult working with children	Use the allegations/low-level-concerns route, correct case manager and LADO process. The person complained about must not manage the concern.
Staff grievance, dignity at work or disciplinary matter	Use the relevant employment procedure. A complainant may be told the matter was addressed but will not normally receive confidential employment details.
Whistleblowing	Use the whistleblowing procedure, especially where an insider reports wrongdoing in the public interest or normal reporting is unsafe.
Placement, admission, EHCP, suspension, exclusion or council decision	Raise this with the commissioning school, academy, local authority or legally authorised decision-maker using its review, appeal or complaints route.
Data protection	Use section 12 of this procedure and the data-protection route; personal-data risk or a breach must also be reported internally without delay.
Insurance, legal proceedings or another statutory process	PBCF may adapt or pause only the overlapping complaint issues, after explaining why. Unrelated issues should continue where fair and safe.

Safeguarding override: Complaint deadlines, informal resolution, mediation and confidentiality must never delay protection of a child or adult at risk, emergency action, evidence preservation or a lawful referral.

4. How to raise a concern or complaint

A concern may be raised in person, by telephone, email, letter or through an advocate. A child, young person or adult participant may use words, communication aids, behaviour or another preferred method. Staff must record and pass on a concern where the person cannot complete a form.

General and formal complaints: Jake Payne, Business Manager - jake@peopletonbrookfarm.co.uk - mark correspondence 'Private and Confidential'.

Complaint about Jake Payne: send it to a Business Owner using the contact route published by PBCF or provided in the placement agreement.

Complaint about a Business Owner: the other uninvolved Business Owner will appoint an independent investigator or panel lead. A person must never investigate or decide a complaint about themselves.

PBCF will not insist on a particular form. To help investigation, include what happened, when and where it happened, who was involved, what has already been tried, relevant evidence, the effect on the person and the outcome sought. Do not send original documents or indecent images. Ask for advice on safe evidence preservation where needed.

Complaints should normally be raised within three months of the event, or the last event in a series. PBCF will accept a later complaint where there is a good reason for delay, the person was unable to complain sooner, safeguarding or equality issues are involved, or a fair investigation remains possible. School holidays do not prevent receipt; if key people are unavailable, PBCF will acknowledge the complaint and give a realistic timetable.

5. Stage 1 - informal concern

Where safe and appropriate, raise the issue with the relevant member of staff or the lead on duty. The staff member will listen, clarify the concern and desired resolution, take immediate safety action, make a proportionate record and involve a manager where needed.

PBCF will aim to respond within five working days. The response may be verbal or written, but the person should be told what was considered, what can be done and how to use Stage 2. A serious concern, complaint about the staff member, repeated issue or request for formal consideration may move directly to Stage 2.

6. Stage 2 - formal complaint and investigation

The complaint should be sent to the Business Manager or the alternative route in section 4. PBCF will:

1. acknowledge the complaint within three working days and identify the complaint handler;
2. confirm the issues, desired outcome, applicable procedure and any reasonable adjustments;
3. check safeguarding, conflict-of-interest, data-breach, criminal, insurance and commissioner-notification requirements;
4. plan an impartial investigation, gather relevant records and accounts, and give people a fair opportunity to respond;
5. keep the complainant informed where the work will exceed the target time; and
6. provide a written outcome normally within 15 working days of acknowledgement.

If 15 working days is not achievable, PBCF will explain the reason before the deadline, state what remains to be done and give a revised date. A complex complaint, staff absence, parallel safeguarding process or need for specialist advice may justify an extension, but delay will be kept to the minimum necessary.

The outcome will address each agreed complaint point, state whether it is upheld, partly upheld, not upheld or cannot be determined, summarise the reasons and evidence considered, identify any remedy or learning that can lawfully be shared, and explain how to request Stage 3. It will not disclose confidential information about another child, adult participant or employee without a lawful basis.

7. Stage 3 - independent review panel

A complainant dissatisfied with the Stage 2 handling or outcome may request Stage 3 within 10 working days of the outcome. The request should explain the remaining issues and why review is sought; lack of formal wording will not prevent a valid request.

The panel will normally consist of three people who were not directly involved in the complaint or Stage 2 decision. At least one member will be independent of PBCF's management and running. Conflicts of interest must be declared and resolved before papers are shared.

7. PBCF will acknowledge the request within three working days and aim to convene the panel within 20 working days;
8. the complainant may attend, use an advocate or be accompanied by a supportive person; the panel may also offer a remote or papers-only review where requested or necessary for access;
9. relevant papers will normally be shared securely at least five working days before the meeting, subject to lawful redaction and safeguarding restrictions;
10. the meeting will be respectful and non-adversarial, and children or vulnerable adults will not be required to confront another person;
11. the panel may uphold, partly uphold or not uphold complaint points, find that a point cannot be determined, recommend redress, require procedural correction and identify service learning; and
12. written findings and recommendations will normally be issued within 10 working days of the meeting and retained for inspection by authorised bodies where lawfully required.

Stage 3 is the end of PBCF's internal procedure. The outcome will identify any external route that is actually relevant to the complainant and the subject matter.

8. Resolution and remedies

The remedy should be proportionate to the impact and within PBCF's authority. Possible outcomes include:

13. an explanation, clarification or correction of inaccurate information;
14. an apology or acknowledgement that the matter could have been handled better;
15. practical action to put something right or reduce continuing harm;
16. a review of support, risk assessment, placement arrangements or reasonable adjustments with the commissioner;
17. staff guidance, training, supervision, policy or system improvement;
18. restorative discussion or mediation only where voluntary, safe and appropriate; and
19. referral to another process, commissioner or authority where PBCF lacks power to decide the issue.

An apology or service improvement is not, by itself, an admission of legal liability. PBCF will check whether agreed actions were completed and record the responsible person and target date.

9. Children, adult participants and advocacy

Staff must take complaints from children, young people and adult participants seriously, including a one-off disclosure or non-verbal indication of distress. They should use the person's preferred communication,

provide enough time, check understanding and avoid leading questions. A trusted adult, parent, carer, independent advocate or representative may assist where appropriate.

For an adult who may lack capacity for a particular decision, staff will apply the Mental Capacity Act 2005, presume capacity unless established otherwise, provide practicable support and consider advocacy. Consent and representation must be recorded. Information may still be shared without consent where lawful and necessary to protect the person or someone else from harm.

The person's views matter even where another person submits the complaint. PBCF will consider whether contacting a parent, carer or representative could create risk and will seek safeguarding advice before doing so where necessary.

10. Fairness, conduct and repeated contact

PBCF will not label a complainant unreasonable merely because they are persistent, upset, neurodivergent, disabled, need support, disagree with the outcome or make a complaint that is not upheld. Staff will separate the merits of the complaint from the way contact is made.

Threats, abuse, harassment, discriminatory language, deliberate disruption or contact so frequent that it prevents fair investigation may be managed through a written communication plan. This may set one contact person, agreed channels, reasonable contact intervals and safety arrangements. Restrictions must be proportionate, time-limited, reviewed and explained with an appeal route to an uninvolved owner.

New matters remain open: A communication plan must not block a new complaint, safeguarding disclosure, whistleblowing concern, data-protection complaint or urgent risk report. Each new matter must be screened on its own merits.

11. Anonymous and withdrawn complaints

Anonymous concerns will be screened for safeguarding, safety, criminal, equality, regulatory and service-quality risk. The absence of a named complainant may limit the investigation but does not justify ignoring credible information. PBCF will record the decision and reason.

A complainant may withdraw at any time. PBCF will ask for confirmation where practicable, but may continue to examine or refer the matter where there is a safeguarding duty, public-interest concern, legal requirement, serious safety risk or need to protect others.

12. Data-protection complaints and confidentiality

From 19 June 2026, section 164A of the Data Protection Act 2018 requires organisations to facilitate data-protection complaints, acknowledge them within 30 days, make appropriate enquiries without undue delay, keep the complainant informed and notify them of the outcome without undue delay. A complaint need not use the words 'data protection'.

PBCF will identify and route any complaint about access, accuracy, disclosure, security, retention, lawful use or other handling of personal data to the person responsible for data protection. The response will explain the right to complain to the Information Commissioner's Office (ICO). An information-security incident will also be assessed under the data-breach procedure, including whether notification is required.

Complaint records will be accurate, relevant, secure and accessible only to people who need them. Correspondence, statements and outcomes will be kept confidential except where disclosure is lawful and necessary, including safeguarding, legal advice, insurance, commissioner oversight, inspection, audit or regulatory requirements. Records will be retained and destroyed in line with PBCF's retention schedule and any litigation, safeguarding or contractual hold.

13. External routes after PBCF's procedure

The correct external route depends on who commissioned the placement, the legal status of the setting and the subject of the complaint. PBCF will give accurate signposting in the final response rather than suggesting that one body can decide every complaint.

20. Commissioning school, academy or local authority: for placement oversight, education decisions, contractual concerns or review under the commissioner's own procedure.
21. Department for Education: only for school or academy complaints within its published remit, normally after the relevant internal process; it reviews compliance with applicable duties and procedures rather than acting as a general appeal body for PBCF decisions.
22. Ofsted: for concerns about a provider it inspects or regulates and within its remit; Ofsted does not normally resolve an individual's dispute or overturn a provider's complaint outcome.
23. Local Government and Social Care Ombudsman: after the relevant council procedure for qualifying complaints about a local authority or commissioned function, subject to the Ombudsman's jurisdiction.
24. Information Commissioner's Office: for data-protection concerns after the matter has been raised with PBCF, or sooner where the ICO's rules allow.
25. Police, safeguarding services, professional regulators or another authority: where the matter falls within their legal remit; urgent referrals do not wait for Stage 3.

14. Recording, monitoring and learning

PBCF will keep a central record of formal complaints, whether they ended at Stage 2 or Stage 3, the outcome of each point, actions taken regardless of outcome, completion checks, correspondence and relevant evidence. Significant informal concerns and anonymous concerns will also be recorded where needed for safeguarding, equality, recurring-risk or service-learning purposes.

The Business Manager and Business Owners will review themes at least annually and sooner where risk requires. Monitoring should consider response times, repeat issues, completion of remedies, safeguarding referrals, data-protection complaints, commissioner concerns, accessibility, SEND and protected-characteristic patterns. Reports will be anonymised unless identification is necessary and lawful.

This procedure will be available in accessible formats on request. Staff receive role-appropriate guidance on receiving complaints, safeguarding triage, impartial investigation, confidentiality, reasonable adjustments, recording and escalation.

Appendix A - Staff complaint-receiving guide

Step	Required action
1. Listen	Stay calm, thank the person, avoid defensiveness and do not promise a particular outcome.
2. Protect	Check immediate danger, safeguarding, medical, data-breach and evidence-preservation needs.
3. Clarify	Identify what happened, the impact, desired outcome and communication or access needs.
4. Record	Write facts and the person's own words; distinguish observation from opinion.
5. Route	Send the matter to the correct manager or specialist process; never manage a complaint about yourself.
6. Confirm	Explain the stage, named contact, target date, confidentiality limits and escalation route.
7. Update	Keep the person informed before a deadline is missed and record reasons for any extension.
8. Close	Address each point, give reasons and remedies, explain review options, and check agreed actions.

Appendix B - Minimum complaint record

26. date received, method, complainant and person affected;
27. communication, disability, language, advocacy and reasonable-adjustment needs;
28. each complaint point, dates, locations, people involved and outcome sought;
29. immediate safety, safeguarding, data-breach, police, LADO or commissioner action;
30. conflict-of-interest check, complaint handler and procedure/stage used;
31. evidence obtained, people consulted, factual findings and credibility reasoning where relevant;
32. updates, extensions and reasons;
33. outcome for each point, remedy, action owner and completion date;
34. Stage 3 request, panel membership, independence declarations, findings and recommendations; and
35. external signposting, learning, monitoring category and retention trigger.

Sources and related guidance

Non-school Alternative Provision: Voluntary National Standards (August 2025) — Department for Education.

Arranging Alternative Provision: A Guide for Local Authorities and Schools (February 2025) — Department for Education.

Best Practice Guidance for School and Academy Complaints Procedures — Department for Education.

Independent School Standards Guidance (April 2026), Part 7 — Department for Education.

Keeping Children Safe in Education 2025 and 2026 — Department for Education.

Working Together to Safeguard Children 2026 — HM Government.

Data Protection Act 2018, section 164A, as inserted by the Data (Use and Access) Act 2025 — UK Parliament.

How to Deal with Data Protection Complaints — Information Commissioner's Office.

Approval record

Approving authority	Name	Signature	Date
Business Owner / authorised approver	Jake Payne	Jake Payne	05/08/2026