

# Concerns, Compliments and Complaints Procedure

## 1. Introduction

This procedure is designed to ensure that the organisation provides proper and consistent attention to concerns and complaints. This applies to all elements of the organisation's services. The procedure outlined below will be followed when any member of staff receives a complaint.

Whilst we always aim to get things right first time, we know that on occasion we may not. If we make a mistake, we will be open and honest about it as soon as possible. We will tell you about our mistake, explain why we think the mistake was made, and tell you how we will do our best to ensure it does not happen again. This applies if you are a child or young person, parent or carer, volunteer, supporter or partner.

Children and adults who receive services from St Piers/Young Epilepsy have a right to voice their comments and complaints, and to have these taken seriously. The complaints procedure is communicated directly to children and young people through the initial materials they are given when they join St Piers/Young Epilepsy.

We recognise that all children need to be supported to know how to make a complaint, regardless of their age or level of ability. Therefore, it is important that we diversify and individualise our communication and support to students.

St Piers/Young Epilepsy promotes the following, as ways in which a child or adult can tell us about their comments or complaints:

- Communicating with any staff member who will follow the procedure outlined in this document.
- Contacting the complaints coordinator directly via email or telephone.
- Meeting the independent advocate who attends St Piers/Young Epilepsy fortnightly, who will then pass over any complaints received to the complaints coordinator.
- Contacting the Children's Commissioner or regulator with their complaint as per posters in all residential services.

St Piers/Young Epilepsy also ensures that this procedure is available to parents, carers and other stakeholders via the St Piers/Young Epilepsy websites.

This procedure should also be read in conjunction with our comments, compliments and complaints policy statement and St Piers/Young Epilepsy's duty of candour policy.

## 2. Definitions

### Concern

A concern is defined as a matter of interest, importance or anxiety. St Piers/Young Epilepsy aims to resolve all concerns informally, quickly and in collaboration with the person raising the concern. Concerns will be managed by the relevant manager in the service where the concern has been raised (for example house manager, care coordinator, teacher or tutor), and no formal records will be kept relating to concerns.

### Compliment

A compliment is positive recognition or praise for a service or individual. We like to know what we are doing well and welcome any compliments. These can be sent to [compliments@youngepilepsy.org.uk](mailto:compliments@youngepilepsy.org.uk) or they can be logged directly on SharePoint by any staff member. The Executive Team and Trust Board are made aware of all the compliments received in the annual complaints and compliments report.

### Complaint

A complaint is defined as any written or verbal expression of dissatisfaction, or a perceived grievance or injustice by a student, a client, his or her parents/guardians, an official of a local education authority or any other individual or organisation with an interest in St Piers/Young Epilepsy.

Complaints are a valuable and constructive source of information concerning the degree to which we can meet the needs and expectations of our students, clients, their families, and the organisations which fund the services they receive. The nature of complaints and the precipitating factors provide the organisation with useful performance indicators. The way in which complaints are received, addressed and resolved offers another set of indices against which we can judge our performance as a service provider.

Any complaints that relate to safeguarding concerns of children and/or young people, will be managed via the child and adult protection and safeguarding procedures and may require the involvement of our external safeguarding partners.

There are certain issues which fall outside the remit of this procedure:

- Staff grievances
- Whistleblowing

The following should be helpful in clarifying the differences.

### Grievance

A Grievance is a concern, problem or complaint raised by a staff member with the employer. A Grievance can only be made by an employee, not a student, parent or local authority. If a staff member has a grievance, the St Piers/Young Epilepsy grievance procedure should be followed.

## Whistleblowing

Whistleblowing is the term used when someone who works for an employer raises a concern about malpractice, risk, wrongdoing or possible illegality. Only those working in St Piers/Young Epilepsy services can whistle blow. If a St Piers/Young Epilepsy employee has a whistleblowing concern, they must follow the St Piers/Young Epilepsy whistleblowing and confidential disclosures procedure.

## 3. General Advice

Sometimes it may be unclear whether someone is asking a question, sharing an opinion, or making a complaint. A brief initial conversation can help clarify the issue and guide next steps.

Staff must understand the difference between a concern and a complaint. Addressing concerns seriously and early can prevent them from escalating into formal complaints.

When possible and appropriate, staff should aim to resolve concerns raised informally and swiftly to find a satisfactory outcome for all parties. In some situations, this may be achieved without speaking to a manager. However, it is managers need to be informed that a concern was raised and any actions taken to achieve a satisfactory resolution. Records are not required for informal concerns, but staff should make brief notes of the concern and the resolution attempt, in the event of the situation escalated to a formal complaint.

The person raising the concern must always be asked whether they are satisfied with the outcome of an informal resolution process.

If informal resolution is unsuccessful, the formal complaints procedure should be initiated.

- Complaints submitted during school, college or residential holidays will be considered as received on the first working day of the new term.
- When complainants do not wish to identify themselves, we will still follow our complaints process as far as is practically possible.
- At every stage of the complaints process, we aim to resolve issues as quickly and effectively as possible.
- All complaints will be handled with the utmost confidentiality. Information will only be shared with individuals directly involved in investigating or resolving the complaint, unless legal or safeguarding obligations require otherwise.
- Records of complaints will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and Retention of Documents Policy
- Complainants may withdraw their complaint at any time. If they choose to do so, they will be asked to confirm this in writing.

## 4. How To Raise a Formal Complaint

A complaint can be raised:

1. Via any staff member in writing or verbally.
2. Sending an email to [complaints@youngepilepsy.org.uk](mailto:complaints@youngepilepsy.org.uk)

In accordance with the Equality Act 2010, St Piers/Young Epilepsy will make reasonable adjustments to ensure that all individuals can access and complete the complaints procedure.

Staff must be proactive in identifying barriers to communication and access, and work collaboratively with the individual, their family, and relevant professionals to ensure their voice is heard and respected.

If a complaint is made via a member of staff, they will promptly document the details in writing and forward it to the complaints coordinator (within 24 hours), who will log the complaint on SharePoint.

If a complaint is received outside of administrative working hours, the duty manager will be contacted and advised of the facts. The duty manager may contact the Senior House Manager on call and/or the 'on call' Executive to discuss the matter and agree on any immediate actions required.

## 5. Investigation Process

We aim to respond to all complaints within allocated timescales. Responses to complaints will state whether the complaint has been upheld or not and details of resultant recommendations and action taken will be provided. If the complaint is upheld, the response will acknowledge that fact and offer an apology.

When a complaint is not upheld the response will ensure the basis for the decision is provided. Care will be taken to ensure that the complainant is treated with respect and consideration and relationships are not damaged in any way as the result of a complaint having been lodged. Details of the procedure for redress will be explained within the letter of response.

A complaint will not be investigated by any member of staff who is implicated in the complaint.

During the course of the complaint relevant legal and insurance advice will be sought as appropriate by St Piers/Young Epilepsy.

## 6. Complaint Resolution Procedure

The complaints coordinator will liaise with the relevant manager/director to establish at which stage the complaint should be managed.

The stages of a complaint are described in Table 1



**Table 1 Three Stages of the Complaint Process**

Stage	Trigger	Who Manages It	Investigation Details	Timeframe
1	Informal resolution not successful Complaint about a specific location within a service Standalone issue (not part of a pattern) No reputational risk or widespread impact	Head of Service	Investigator assigned by Head of Service	Response sent within 20 working days (Term Time)
2	Complainant dissatisfied with Stage 1 response Concerns are widespread or significantly impact students Reputational risk to the organisation Referral to Regulators (Charity Commission/Ofsted/CQC)	Executive Team Member	Investigator assigned by Executive Team Member Executive Member assesses fairness and thoroughness of Stage 1 May trigger re-investigation if flaws or gaps are found	Response sent within 20 working days (Term Time)
3	Complainant dissatisfied with Stage 2 response Complaint involves an Executive member, governor or trustee	CEO and Chair of Trustees	Stage 3 panel convened (at least 2 impartial members) by CEO and Chair of Trustees. Panel reviews adequacy and fairness of Stage 2 investigation	Panel review within 30 working days Response sent within 5 working days of hearing

## Stage 1

2.1 The complaints coordinator will pass a Stage 1 complaint to the appropriate head of service, copying in the relevant executive.

2.2 The complaint will be acknowledged **within 48 hours** of receipt by the complaints coordinator.

2.3 The head of service will assign an appropriate manager to investigate the complaint and notify both the executive and complaints coordinator of the investigator's name.

- If the complaint involves the head of service, the appropriate executive will appoint a commissioning manager to oversee the investigation.

2.4 The appointed investigation manager will:

- Have a discussion with the complainant to clarify the precise nature of the complaint and the complainant's desired resolution.
- Obtain relevant reports/statements from staff responsible for the area of activity about which the complaint has been made.
- Obtain any relevant records to assist in the investigation.

2.5 The investigation manager clear notes of all meetings, conversations and of the receipt of any documentation are kept.

2.5 Once the investigation is complete, the outcome will be submitted to the head of service who commissioned the investigation.

2.5 The head of service will write the response to the complainant. This will be sent to the complainant via email and also by recorded delivery and copied to the complaints coordinator. The head of service will offer to meet with the complainant to discuss the outcome and ensure a resolution is achieved.

2.5 If the complainant remains dissatisfied, they may request escalation to **Stage 2**. This must be submitted in writing **within 10 working days** of receiving the final response, outlining the reasons for dissatisfaction.

2.5 If no escalation request is received within 10 working days, the complaint will be considered closed.

2.10 Late escalation requests may be accepted at the discretion of the commissioning manager, where exceptional circumstances (e.g. serious illness, bereavement) are demonstrated. The commissioning manager will confirm in writing whether the late request has been accepted.

## Stage 2

- 3.1 The complaints coordinator will pass the Stage 2 complaint to the relevant member of the Executive Team.
- 3.2 The complaint will be acknowledged to the complainant by the complaints coordinator, within 48 hrs of receipt.
- 3.3 The member of the Executive Team will refer the complaint to an appropriate impartial manager or other executive to investigate and inform the complaints coordinator who they have identified.
- 3.4 Notes will be kept of all meetings, conversations and of the receipt of any documentation.
- 3.5 Once the investigation is complete, the outcome will be submitted to the executive who commissioned the investigation.
- 3.6 The member of the Executive Team will inform the complainant and the complaints coordinator of the outcome of the complaint investigation in writing. The member of the Executive Team will offer to meet with the complainant to discuss the outcome and ensure a resolution is achieved.
- 3.7 If the complainant remains unsatisfied with the outcome, they can formally request for their complaint to be passed for **Stage 3** resolution. This must be submitted in writing, **within 10 working days** of the receipt of the final response letter, to the complaints coordinator, outlining why and/or which parts of the process they remain dissatisfied.

## Stage 3

- 4.1 The complaints coordinator will pass the Stage 3 complaint to the chief executive and the chair of trustees (unless this has already been received directly).
- 4.2 The complaint will be acknowledged to the complainant by the complaints coordinator, within 48 hours of receipt of the complaint.
- 4.3 The chief executive and the chair of trustees will appoint a Stage 3 complaints panel, comprising at least two individuals.
- 4.4 The complainant will be invited to attend the panel meeting (usually via teams) and may be accompanied by a representative or advocate and will be given the opportunity to present their views. The complainant must have reasonable notice of the date of the review panel.
- 4.5 The panel will review the adequacy and fairness of the Stage 2 investigation and produce a written report with findings and recommendations.
- 4.6 The panel will communicate this decision to the complainant in writing within **5 working days** of the hearing.
- 4.7 The panel will inform the chief executive and chair of trustees and governors of the outcome of the review.
- 4.8 The decision reached is final, with no right of appeal.
- 4.8 If the complainant remains dissatisfied the complainant will be advised of their right to refer their complaint to the Charities Commission, Ofsted and/or CQC.

## 8. Recording and Monitoring Complaints

A complaint is logged on receipt. This ensures that complaints are recorded consistently and that the investigation and resultant recommendations and actions are monitored and

transparent. The complaints log is accessible on SharePoint to the complaints coordinator, heads of service and executive team.

We are required to notify the Adult Social Care Customer Relations Team via email on [asc.customerrelations@surreycc.gov.uk](mailto:asc.customerrelations@surreycc.gov.uk) of any new complaints that Young Epilepsy receives relating to students aged over 18 years whose package of care is commissioned in part or in full by Surrey County Council. We will inform them of the following:

- the name of the complainant
- the name of the person whom the complaint is being raised on behalf of
- The date you received the complaint and an outline of your planned investigation and response.

It is the responsibility of the head of service to ensure the recommendations and actions generated as a result of a complaint are completed carried out, with the aim of ensuring that we continue to develop services to provide the best care, education and health provision for children, young people and adults at risk. Completion of recommendations and actions will be logged.

The Education Governing Body is responsible for sampling complaints annually, as well as monitoring trends and areas of risk, to ensure that the complaints process is effective and that appropriate actions and recommendations are being implemented as a result of complaints.

The Clinical Governance Steering Group will also monitor and analyse any complaints that implicate a clinical governance issue.

## **9. Referral to other Organisations/Options after Stage 3 Appeal**

If, at any stage of the procedure the complainant is unhappy with the process of the investigation or in its resolution, they may refer the matter to the organisations listed below.

### **1. Adult Social Care Services and Health Services**

#### **Care Quality Commission (CQC)**

Citygate, Gallowgate,  
Newcastle upon Tyne, NE1 4PA  
Telephone: 03000 616161  
Website: [www.cqc.org.uk](http://www.cqc.org.uk)  
Young Epilepsy Provider ID: 1-101610290  
Young Epilepsy Location ID: 1-1377906412.

### **2. Educational Services( College & School) and Children's Residential Care: Ofsted**

3rd Floor, Royal Exchange Buildings,  
St Ann's Square, Manchester, M2 7LA  
General Enquiries: 0300 123 1231  
Complaints Line: 0300 123 4666  
Website: [www.gov.uk/complain-to-ofsted](http://www.gov.uk/complain-to-ofsted)

### **3. Education Law and Procedure: Department for Education (DfE)**



If the complainant believes that St Piers School or College did not handle their complaint in accordance with the published complaints procedure or acted unlawfully or unreasonably in exercising their duties under education law, they may contact the Department for Education **after completing Stage 3** of this procedure.

The Department for Education will not normally reinvestigate the substance of complaints or overturn any decisions made by St Piers School or College. They will consider whether we have adhered to education legislation and any statutory policies connected with the complaint.

Contact options:

- **Online:** [www.education.gov.uk/contactus](http://www.education.gov.uk/contactus)
- **Telephone:** 0370 000 2288
- **Post:** Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD

#### **4. 3. Charitable Services: The Charity Commission.**

The Charity Commission regulates registered charities in England and Wales. It ensures that charities like **Young Epilepsy** are accountable, well-run and meet their legal obligations. Serious concerns about the organisation's conduct may be referred to the Charity Commission. Further information is available on the government site [HERE](#)

**This policy is agreed by the Trust Board and will be implemented by all departments.**

<b>Signed:</b>	<b>Date:</b>
<b>Chief Executive</b>  	<b>11 December 2025</b>
<b>Markus Ruetimann</b>  <b>Chair of Trustee Board:</b> <b>Markus Ruetimann</b>	<b>11 December 2025</b>
<b>Date of next review:</b>	<b>1 December 2027</b>

#### Version table

**Creation:- Gill Walters**

**Approved by:-**

<b>Version No.</b>	<b>Date of changes</b>	<b>Reason for change</b>	<b>Changes made by</b>
5	01 July 2022	Removed reference to children's homes and updated with Residential Special Schools - NMS	Gill Walters
6	24 Aug 2022	Added in compliments email	Gill Walters
7	15 February 2024	Additions include – anonymous complaints, withdrawal of complaint, outside of term time complaint, DfE contact details	Gill Walters
8	03 November 2025	General review. Clarity added to 2.3 and 2.7 Addition of 2.9 Stage 3 process reviewed and updated Addition of Charity Commission Referral to other organisations – checked.	Gill Walters