



CReATIVE Education Provision

IWYS Alternative Provision Complaints Policy

IWYS ALTERNATIVE EDUCATION PROVISION

COMPLAINTS PROCEDURE POLICY

1. Purpose and Aims

IWYS Alternative Education Provision provides a safe, nurturing, inclusive and high-quality educational environment.

We recognise that parents/carers, pupils, commissioning schools, local authorities and other stakeholders may occasionally have concerns about the education, welfare, safeguarding, support or services provided by IWYS.

This procedure provides a clear, fair and accessible complaints process.

IWYS aims to:

- resolve concerns promptly and informally wherever appropriate;
- provide a clear formal complaints process;
- investigate complaints fairly, objectively and without unnecessary delay;
- ensure that safeguarding concerns are acted upon immediately;
- involve the relevant commissioning school or local authority where appropriate;
- provide an independent review where a complaint remains unresolved;
- make reasonable adjustments for complainants who require additional support;
- maintain confidentiality and comply with data-protection requirements;
- learn from complaints and use them to improve provision; and
- ensure that children and young people are listened to and their views are appropriately considered.

A complaint will not adversely affect a pupil's education, support or welfare.

2. England-Specific Alternative Provision Context

IWYS recognises that Alternative Provision may be commissioned in different ways.

A pupil may be referred to IWYS by:

- a maintained school;
- an academy or academy trust;
- a local authority;
- a pupil referral unit or other educational setting;
- another authorised commissioning organisation.

DfE's statutory Alternative Provision guidance applies to independent providers delivering Alternative Provision as well as schools, academies, PRUs and local authorities. ([GOV.UK](https://www.gov.uk))

Where IWYS is commissioned by a school or local authority, the commissioning body's responsibilities and the contractual arrangements for the placement will be taken into account when handling a complaint.

IWYS will not use this procedure to avoid or transfer responsibilities that properly belong to the commissioning organisation.

Where appropriate, IWYS will work jointly with the:

- commissioning school;
- local authority;
- designated safeguarding professionals;
- SEND professionals;
- social care;
- health professionals; and
- other relevant agencies.

3. Complaints and Concerns

3.1 Concern

A concern is worry, dissatisfaction or uncertainty that may be resolved through clarification, reassurance or early action.

3.2 Complaint

A complaint is dissatisfaction with an action, service or failure to act.

3.3 Who Can Complain?

IWYS will consider complaints from:

- parents and carers;
- pupils and young people;
- former pupils where the complaint concerns their time at IWYS;
- commissioning schools;
- local authorities;
- social care or other professionals;
- visitors;
- staff, where the matter falls within this procedure; and
- other individuals or organisations with a legitimate interest in the provision.

Anyone with a legitimate interest may complain.

4. Matters Covered by Other Procedures

Some concerns must be dealt with under a separate procedure.

These include:

- child protection and safeguarding;
- allegations against staff;
- low-level concerns about staff;
- whistleblowing;
- staff grievances;
- staff disciplinary matters;
- admissions;
- SEND statutory assessment or EHC Plan matters;
- suspension or permanent exclusion where a separate statutory process applies;
- examination or awarding-body complaints;
- data-protection complaints;
- criminal matters; and
- complaints about a service provided entirely by another organisation.

IWYS may separate multiple issues and apply the appropriate procedure to each.

5. Safeguarding Takes Priority

5.1 Immediate safeguarding action

A complaint must never delay action to safeguard a child.

If information received as part of a complaint indicates that a child may be suffering, or may be at risk of suffering:

- abuse;
- neglect;
- exploitation;
- sexual abuse;
- sexual harassment;
- violence;
- criminal exploitation;

- radicalisation;
- serious harm; or
- another safeguarding concern,

the matter must immediately be referred to the Designated Safeguarding Lead (DSL) charmaine@iwys.co.uk or Deputy DSL. (Joy Baines – Email joy@iwys.co.uk)

Safeguarding procedures take priority.

KCSIE 2026 is the current statutory safeguarding guidance in England from 1 September 2026 and applies to schools and colleges. IWYS will ensure that its safeguarding arrangements are consistent with the safeguarding expectations applicable to its status and commissioning arrangements. ([GOV.UK](https://www.gov.uk))

5.2 Allegations against staff

Where a complaint constitutes an allegation that an adult working at IWYS has:

- behaved in a way that has harmed a child;
- may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child in a way that indicates they may pose a risk of harm,

the allegation must be managed under the IWYS allegations-against-staff procedure.

The Local Authority Designated Officer (LADO) must be contacted where the threshold for LADO involvement is met.

This procedure does not replace the safeguarding allegations process.

[IWYS-Allegations-Against-Staff-and-Low-Level-Concerns-Policy.pdf](#)

6. Role of the Commissioning School

Where a pupil is placed at IWYS by a school, IWYS will work with the commissioning school when a complaint relates to:

- the individual pupil's placement;
- attendance;
- progress;
- safeguarding;
- behaviour;
- SEND;
- welfare;

- reintegration;
- communication between IWYS and the school; or
- the effectiveness or suitability of the placement.

The commissioning school will be informed where appropriate and lawful.

The school will remain responsible for matters which legislation, statutory guidance or the commissioning agreement places upon the school.

IWYS will cooperate with reasonable requests from the commissioning school for information required to investigate a complaint or safeguard a pupil.

7. Role of the Local Authority

Where the local authority has commissioned or has responsibility for the pupil's education, IWYS will cooperate with the local authority's reasonable requests concerning:

- safeguarding;
- suitability of education;
- attendance;
- SEND;
- health needs;
- welfare;
- quality assurance;
- placement reviews;
- complaints and concerns;
- information sharing; and
- regulatory or statutory enquiries.

Local authorities have duties relating to children in their area and play an important role in the oversight and commissioning of Alternative Provision.

DfE and Ofsted have highlighted the importance of commissioners checking the suitability and quality of AP before placement and regularly reviewing the safety and effectiveness of commissioned provision. ([GOV.UK](https://www.gov.uk))

IWYS will therefore cooperate with local-authority quality-assurance processes and relevant local AP frameworks.

8. Non-School Alternative Provision Standards

Where IWYS operates as non-school Alternative Provision, the provision will seek to implement the Department for Education's **Non-school Alternative Provision: Voluntary National Standards**.

The standards cover:

1. safeguarding and welfare;
2. health and safety;
3. admissions, guidance and support; and
4. quality of education.

The DfE states that these standards are intended to support local oversight and commissioning and encourage providers to make their policies accessible to commissioners, local authorities, parents and the wider public. ([GOV.UK](https://www.gov.uk/government/publications/non-school-alternative-provision-voluntary-national-standards))

IWYS will therefore make this complaints procedure available to relevant commissioners and parents/carers.

9. Stage 1 – Informal Resolution

Raise concerns first with the relevant staff member or Head of Provision.

Concerns may be raised:

- in person;
- by telephone;
- by email; or
- in writing.

IWYS will seek to resolve straightforward concerns promptly.

Where appropriate, the Head of Provision may arrange a meeting with the complainant.

IWYS will normally:

- acknowledge an informal complaint within 5 school days; and
- provide a response within 15 school days.

The complainant will be asked, where appropriate, what outcome they believe would resolve the matter.

If the complaint cannot be resolved informally, it may progress to Stage 2.

10. Stage 2 – Formal Complaint

A formal complaint should normally be submitted in writing.

IWYS will assist anyone unable to complain in writing.

A formal complaint should include:

- the complainant's name;
- contact details;
- pupil's name, where applicable;
- relevant dates;
- details of the complaint;
- people involved;
- relevant evidence;
- details of previous attempts to resolve the matter; and
- the outcome sought.

Formal complaints may be submitted to the Head of Provision (Charmaine Baines – Proprietor email charmaine@iwys.co.uk and Tel: 07341214173

IWYS will normally acknowledge a formal complaint within 3 school days.

IWYS will appoint a suitably skilled investigator without conflicts of interest.

The investigator may:

- interview relevant individuals;
- examine records;
- consider written evidence;
- consult the commissioning school;
- consult the local authority where appropriate;
- seek professional advice where necessary; and
- consider the pupil's views where appropriate.

A written response will normally be provided within 15 school days.

The response will state:

- the issues considered;
- the evidence considered;
- the findings;
- whether the complaint is upheld, partially upheld or not upheld;
- any action to be taken; and
- how to request a Stage 3 review.

11. Stage 3 – Independent Review Panel

11.1 Purpose

Stage 3 independently reviews the complaint's handling and outcome.

The panel will not repeat the Stage 2 investigation.

It will consider whether:

- the complaint was investigated fairly;
- relevant evidence was considered;
- the procedure was followed;
- the conclusions were reasonable; and
- appropriate action has been identified.

11.2 Independent panel arrangements

Where IWYS is subject to the **Education (Independent School Standards) Regulations 2014**, its complaints procedure must include a panel of at least three people who were not directly involved in the matters complained about, including at least one person independent of the management and running of the school. ([Legislation UK](#))

Where IWYS is operating as non-school/unregistered Alternative Provision and those regulations do not apply, IWYS will nevertheless use an independent review arrangement as a matter of good practice.

The panel should normally comprise:

- at least three suitable people;
- people with no conflict of interest;
- people who have not previously investigated the complaint; and
- at least one person who is independent of IWYS management.

For non-school AP, an independent panel member may be sourced from an appropriately experienced education professional, another AP provider, another educational organisation, an appropriate local-authority contact, or another suitably independent person.

The independent person must have had no prior involvement.

12. Requesting Stage 3

The complainant should request a Stage 3 review within 15 school days of receiving the Stage 2 outcome.

The request should explain:

- why the complainant remains dissatisfied;

- which parts of the Stage 2 process they believe were inadequate;
- any relevant new evidence; and
- the outcome they are seeking.

IWYS will acknowledge the request within 5 school days.

The panel will normally be arranged within 15 school days of the request, subject to the availability of suitable independent panel members.

The complainant will receive reasonable notice of the hearing.

13. Stage 3 Hearing

The complainant will be allowed to attend the hearing and may be accompanied by a suitable companion.

The panel will:

- explain the purpose of the hearing;
- consider the complaint and Stage 2 investigation;
- allow the complainant to explain their concerns;
- allow IWYS to respond;
- consider relevant evidence;
- ask questions;
- consider the pupil's views where appropriate; and
- reach its decision independently.

The panel will normally meet in private.

Legal representation is normally unnecessary.

The panel may allow written submissions where a party is unable to attend.

14. Stage 3 Outcome

The panel may:

- uphold the complaint;
- partially uphold the complaint; or
- not uphold the complaint.

The panel may recommend:

- corrective action;
- an apology;

- further review;
- staff training;
- changes to procedures;
- additional safeguarding action;
- improved communication with the commissioning school or local authority; or
- other proportionate improvements.

The panel's findings and recommendations will be recorded.

The written outcome will normally be provided within 15 school days of the hearing.

This completes IWYS's internal complaints procedure.

15. Complaints Involving a Commissioning School or Local Authority

Where a complaint concerns both IWYS and the commissioning school or local authority, IWYS will identify which organisation is responsible for each aspect.

A joint response may be appropriate.

IWYS will not prevent a complainant from using the commissioning body's own complaints procedure where that body has responsibility for the matter.

Where the issue concerns a local-authority statutory duty, the complainant will be advised that the relevant local-authority complaints process may also apply.

16. Complaints Against the Head of Provision

A complaint against the Head of Provision must not be investigated by the Head of Provision.

The complaint should be referred to the Proprietor or another appropriately designated person.

The Proprietor may appoint:

- an independent investigator;
- an external education professional; or
- another suitably qualified person.

Where appropriate, an independent review panel will be convened.

Where the complaint also amounts to a safeguarding allegation, the safeguarding allegations procedure and LADO arrangements will apply.

17. Complaints Against the Proprietor

Where a complaint concerns the Proprietor, the Proprietor must not determine the complaint themselves.

An independent person will be appointed to manage the investigation.

Where the complaint proceeds to Stage 3, the panel will contain appropriate independent members with no previous involvement in the matter.

18. Complaints About Safeguarding or Child Protection

IWYS will address safeguarding complaints immediately.

Where appropriate, IWYS will notify or cooperate with:

- the Local Authority Designated Officer;
- children's social care;
- the commissioning school;
- the local authority;
- the police;
- safeguarding partners; or
- another relevant statutory agency.

Working Together to Safeguard Children 2026 applies to organisations and agencies working with children and emphasises multi-agency safeguarding arrangements. ([GOV.UK](https://www.gov.uk))

The normal complaints timetable may be suspended where necessary to protect a child or avoid prejudicing a safeguarding investigation.

19. Persistent or Unreasonable Complaints

IWYS will treat complaints seriously.

However, communication arrangements may be restricted where a complainant:

- repeatedly raises the same matter after the procedure has been completed;
- makes excessive or repetitive contact;
- behaves abusively or threateningly;
- makes unreasonable demands on staff time;
- refuses to engage with reasonable parts of the procedure; or
- seeks to disrupt the provision.

Possible arrangements include:

- appointing one point of contact;

- limiting communication to email or writing;
- agreeing reasonable contact times;
- limiting repeated correspondence about the same issue; or
- requiring communication through an appropriate representative.

Restrictions will be proportionate and recorded.

IWYS will consider genuinely new information.

20. Complaints Campaigns or Multiple Complaints

Where IWYS receives a significant number of complaints about the same issue, IWYS may coordinate the response.

This may include:

- a single investigation;
- a common written response;
- meetings with representatives of the complainants; or
- liaison with the commissioning school or local authority.

Individual safeguarding or child-specific concerns will always be considered separately where necessary.

21. Data Protection and Confidentiality

IWYS will maintain confidentiality throughout.

Information will only be shared where there is a lawful basis, including where necessary for:

- safeguarding;
- legal obligations;
- statutory duties;
- inspection;
- quality assurance;
- the investigation of the complaint; or
- the exercise of another lawful function.

Personal information will be managed in accordance with UK data-protection law and the IWYS Privacy Notice.

Complaints about personal-data handling will also be considered under IWYS's data-protection complaints arrangements.

A complainant may have a right to complain to the Information Commissioner's Office where appropriate.

22. Record Keeping

IWYS will maintain confidential complaints record containing, where applicable:

- the original complaint;
- acknowledgement;
- investigation notes;
- relevant evidence;
- correspondence;
- meeting notes;
- Stage 2 outcome;
- Stage 3 panel information;
- panel findings;
- actions taken; and
- lessons learned.

Records will be securely stored and retained in accordance with IWYS's data-retention arrangements.

Where applicable, complaints records will be made available to inspectors or competent authorities where lawfully requested.

23. Monitoring and Quality Assurance

The Head of Provision will monitor complaints to identify:

- recurring issues;
- safeguarding themes;
- attendance concerns;
- concerns about education quality;
- behaviour-related issues;
- SEND concerns;
- communication problems;
- commissioning issues; and
- areas requiring improvement.

Where appropriate, complaints information will be shared with commissioning schools and local authorities as part of quality assurance and safeguarding arrangements.

This is particularly important because DfE and Ofsted have identified the need for commissioners to regularly review the safety and effectiveness of Alternative Provision placements. ([GOV.UK](https://www.gov.uk))

24. Learning From Complaints

IWYS will use complaints to improve provision.

Following a complaint, IWYS may:

- change a procedure;
- provide additional staff training;
- improve communication;
- review risk assessments;
- review safeguarding arrangements;
- change a placement arrangement;
- involve the commissioning school or local authority;
- provide additional support to a pupil; or
- introduce preventative measures.

The purpose is not simply to determine whether a complaint is upheld, but to identify whether IWYS can improve the experience and outcomes of children and young people.

25. External Escalation

After completion of the IWYS procedure, the complainant will be informed of any appropriate external route.

The appropriate route depends on the nature of the complaint and IWYS's legal status.

Possible external bodies include:

- the commissioning school or academy trust;
- the relevant local authority;
- the Department for Education;
- Ofsted;
- the Information Commissioner's Office;
- the Local Authority Designated Officer;
- children's social care;
- the police; or
- another relevant statutory or regulatory body.

External bodies may have limited powers and may not reinvestigate.

For example, DfE's role in relation to academy complaints is generally to consider whether the academy has followed a proper complaints procedure rather than to substitute its own decision for the school's decision. ([GOV.UK](https://www.gov.uk))

26. Review of this Policy

This policy will be reviewed annually by the Head of Provision and Proprietor, or sooner where:

- legislation changes;
- DfE guidance changes;
- KCSIE is updated;
- national AP standards become mandatory;
- local-authority AP requirements change;
- commissioning arrangements change; or
- experience from complaints indicates that the procedure should be amended.

The policy will remain publicly accessible and will be provided to commissioners, parents/carers and other appropriate stakeholders on request.

APPENDIX 1 – IWYS COMPLAINT FORM

Name of complainant:

Pupil's name (if applicable):

Relationship to pupil:

Commissioning school/local authority (if applicable):

Contact details:

Please describe your complaint, including relevant dates, people involved and actions already taken:

What outcome would you like IWYS to consider?

Have you raised this concern previously? If yes, please provide details:

Are you attaching evidence or supporting documents?

Signature: _____

Date: _____

APPENDIX 2 – COMPLAINTS PROCESS AT A GLANCE

Stage	Process	Target
Stage 1	Informal concern / early resolution	Acknowledge within 5 school days; response normally within 15 school days
Stage 2	Formal written complaint and impartial investigation	Acknowledge within 3 school days; outcome normally within 15 school days
Stage 3	Independent review panel	Aim to arrange within 15 school days; written outcome normally within 15 school days of hearing
Safeguarding	Immediate referral to DSL / appropriate safeguarding agency	Immediate – normal complaints timetable may be suspended
Commissioning issue	Liaison with commissioning school/local authority	As required by circumstances
External escalation	Appropriate external body after internal process	As applicable

KEY REFERENCE FRAMEWORK

This policy is intended to operate alongside:

- Department for Education **Alternative Provision** statutory guidance;
- **Keeping Children Safe in Education 2026**;
- **Working Together to Safeguard Children 2026**;
- Department for Education **Non-school Alternative Provision: Voluntary National Standards**;

- relevant local-authority Alternative Provision commissioning and quality-assurance requirements;
- relevant safeguarding partnership procedures;
- Education (Independent School Standards) Regulations 2014, Part 7, **where applicable to IWYS's legal status**; and
- IWYS safeguarding, equality, SEND, behaviour, attendance, privacy and data-protection policies.

Approved by:	Proprietor / Head of Provision
Effective Date:	October 2026
Review Date:	October 2027
Applies to:	Pupils, parents/carers, commissioning schools, local authorities, professionals, staff, visitors and other relevant stakeholders