Greenfields School Complaints Policy 2026-2027

Implemented	By Whom	Last Review	By Whom	Next Review
August 2023	J. Parry	September 2026	Craig Thomas	September 2027

Document History (last 3 versions)

Date of Issue	Version No.	Person(s) responsible for change	Nature of Change
03/10/25	2	Creslyn Singh	Review and update
12/03/26	3	Creslyn Singh	Reviewed
01/09/26	4	Craig Thomas	Reviewed

This policy is aligned with the Independent School Standards (Wales) Regulations 2024, Estyn Inspection Framework (2022), Wales Safeguarding Procedures (2019), Newport City Council Complaints Escalation Pathways.

Greenfields Culture, Ethos and Mission

Our School
Greenfields School is an independent special school for young people with Social, Emotional and Mental Health (SEMH) difficulties for both boys and girls aged 9-16 years old. The school is registered for up to 30 learners and consists of 2 small primary style transition classes to provide a nurturing environment to develop and progress throughout the learning journey and the pupils transition to Secondary education; as well as providing English, Maths, Science, Expressive Arts, Humanities, PSHE and PE lessons for our older learners. We are a school that is able to support children and teenagers who suffer with trauma or mental health problems and whose troubled behaviour acts as a barrier to learning. Located in Newport we therefore benefit from some amazing community spaces where we enhance our curriculum with equestrian skills, free running, farm skills, pottery painting, outdoor learning, swimming lessons, boxing and fitness classes. All the staff at Greenfields School are committed to creating a setting which not only focuses on academic success, but also provides our learners opportunities to develop their social, communication and independent skills

Mission Statement
Preparing learners for the future by providing a sustainable outstanding educational experience where all learners realise pursue and achieve their full potential, enabling them to thrive as adults.

Legislative Framework
- Independent School Standards (Wales) Regulations 2024 (Regulation 7 – Complaints)
- Education Act 2002 (Wales)
- Rights of Children and Young Persons (Wales) Measure 2011
- United Nations Convention on the Rights of the Child (UNCRC)
- Welsh Government Keeping Learners Safe (2022)
- Welsh Government Rights, Respect, Equality (2019)
- Wales Safeguarding Procedures (2019)
- Additional Learning Needs and Education Tribunal (Wales) Act 2018

The difference between a concern and a complaint
A ‘concern’ may be defined as ‘an expression of worry or doubt over an issue considered to be important for which reassurances are sought’. A complaint may be generally defined as ‘an expression of dissatisfaction however made, about actions taken or a lack of action’.

It is in everyone’s interest that complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to invoke formal procedures. The School will take informal concerns seriously and make every effort to resolve the matter as quickly as possible.

There are occasions when complainants would like to raise their concerns formally. In those cases, the school’s formal procedure will be invoked through the stages outlined within this policy.

Who can raise a concern or make a complaint?

Any person, including learners or members of the general public, may raise a concern or make a complaint about any provision of facilities or services that a school provides, unless separate statutory

procedures apply (such as exclusions or admissions). The School will not limit complaints to parents or carers of children that are registered at the school.

It is important in the Greenfields School that learners have a voice and are listened to as valued members of the school community. Central to this concept is the idea that all learners will be supported to raise any concerns they may have about the school, will be listened to, and can be assured that the staff team will act on these concerns to achieve resolution. Learners placed in the school have a variety of options when wanting to raise a concern and these include the following:

- Group meetings
- Tutor time
- 1:1 with a member of teaching staff at any time
- Independent Advocate
- To a member of staff in the residential home who can then bring the concern to the school
- To any other professional involved in the life of the child and who can then advocate on their behalf.

The school will make every effort to initially resolve the concern in an informal and timely manner, and will always give the person raising the concern the opportunity to express how they would resolve the situation, or the outcomes they would require for resolution to be achieved.

Should such resolution not be achieved, or should someone request to make a formal complaint, then the formal complaints process will be initiated and adhered to, to conclusion. Greenfields School ensures learners can raise concerns in line with UNCRC Article 12, ensuring that every learner has the right to be heard, supported, and taken seriously.

What does NOT constitute a complaint for the purposed of this policy?

Within statutory procedures and guidance certain matters arising will not be considered under the School's Complaints Policy, and the School should refer to alternate policy sources to consider procedures to be applied. These are as follows:

- **Admissions to the school**: complaints should be raised with either the School or the Local Authority responsible for placing the child;
- **Statutory Assessments of ALN**: complaints should be raised with the Local Authority holding responsibility for the child;
- **Safeguarding & Child Protection:** The School should refer to the Safeguarding Policy & Procedures;
- **Whistleblowing:** The School should refer to the Whistleblowing Policy and Procedures;
- **Exclusion of a child from school:** The School should refer to the Exclusion Policy;
- **Staff grievances and disciplinary:** The School should refer to the Disciplinary and Grievance Policy and Procedures;
- **Complaints about external service providers:** Complaints should be directed to that service provider and dealt with under the providers own Complaints Policy.

Where the complainant is a LA-placed learner, the school will notify the LA's Education and Inclusion Services where required, in accordance with local authority procedures.

Duties of the School

In order to ensure transparency and to meet the requirements of paragraph 7 of the Independent School Standards (Wales) Regulations 2024, the school will ensure that the Complaints Policy and Procedure:

- Is easily accessible and publicised;
- Available on request;
- Is simple to understand and use;
- Is impartial;
- Is non-adversarial;
- Enables a full and fair investigation by an independent person where necessary;
- Respects people's desire for confidentiality;
- Addresses all the points at issue and provides an effective response and appropriate redress, where necessary;
- Provides information to the School's senior management team so that services can be improved.
- Ensure that complaints evidence feeds into the school's Self-Evaluation (SEF)
- Provide anonymised termly complaints analysis to the Proprietor, in line with ISSR Wales expectations.
- Ensure that trends are used to inform improvements and the School Development Plan (SDP).

Recording and Reporting

Greenfields School will comply with its obligations under the Equality Act 2010 to ensure that all consideration is given to the preferred method of communication by the complainant due to any disability or learning difficulty they may have, and the School will allow alternative methods of contact in order to support a complaint being made and heard.

A complaint may be made in person, by telephone, or in writing (including email, text or other social media communication available to the school). Other than receiving a complaint in writing, for other media, brief notes should be made, clarified with the complainant and agreed as correct. It may be appropriate to send a formal written response to clarify the points raised, and this should be added to the complaint record.

Where there are communication difficulties, the School will use a recording device to ensure accuracy of recording, which can be reviewed by the complainant as required.

All learners in the school can record their complaints on the Learner Complaints Form, available to all learners. If the learner has difficulties with literacy skills, a member of staff (not included in the scope of the complaint) can use this as a basis from which to help the young person write a more accurate complaint; and may use other methods of communication and recording as appropriate to the needs of the learner.

All concerns and complaints received by the School will be recorded on Behaviour Watch. This will log particular details of the concern or complaint. If the issue arising needs to be investigated as a formal complaint then a formal complaints record will be started (referenced to the Complaints Log). This record will be completed at all stages of the complaint until conclusion and final outcomes, and will contain all information and evidence pertinent to the complaints process.

The Headteacher is responsible for the regular review and maintenance of the Complaints records on Behaviour Watch, ensuring the process in place for a complaint if followed in a timely manner, and ensuring the investigation process is fair, robust and thorough. All complaints are to be logged on the Headteacher Monthly Monitoring Report sent to the Head of Education Services each month.

All complaints are logged on BehaviourWatch and categorised in line with ISSR (Wales) reporting requirements.

In the event of a complaint being raised against the Headteacher at the School, this should be raised with the Proprietor for Greenfields. Contact details below:

Rob Mcconomy – Regional Education Lead / Proprietor
Rob.Mcconomy@caretech-uk.com

Timeliness

The School is duty bound to consider and resolve complaints in a timely manner, without allowing excessive time to pass before a conclusion is reached, yet not processing a complaint so quickly that the speed of investigation impacts on the quality of process, and, by extension, the fairness of any conclusion and outcomes reached.

For this reason, the School gives clear guidance as to expected timescales for each stage of the process in the next section. The School accepts that, at times, extenuating circumstances may prevent these timescales from being adhered to, but that the reasons for any delay should be formally recorded in the complaints record.
The School will communicate timescales, and any changes to these, clearly to the complainant at each stage of the process.

The School expects complaints to be made as soon as possible after the event giving rise to the complaint. In general, the School will not investigate a complaint if it is raised more than three months after the event occurring. The School will consider each individual complaint on the circumstances arising and may make allowances for going beyond these timelines if extenuating reasons exist.

WHO LEADS A COMPLAINT?

It is important to note that as Greenfields School has low levels of staffing, at times, it may not be appropriate for a teacher to investigate or reach a decision about complaints raised in the school, and in order to ensure that all complaints are handled in a fair and unbiased manner. To that end, the Headteacher may refer a complaint to another Headteacher within the group, and referred to below as the 'Supporting Headteacher'. In the instance of a Stage 2 – Formal Consideration arising, the matter MUST go to the 'Supporting Headteacher' in the first instance and may than be referred back to the Greenfields Schools Headteacher should that be decided. The Head of Education Services may, at times, be considered the most appropriate 'Supporting Headteacher' to deal with a complaint arising.

FOR A CONCERN OR FOR RESOLUTION AT STAGE 1 – LOCAL / INFORMAL RESOLUTION:
The process should be led by the Headteacher, on receiving the concern or complaint. If this member of staff dealing with the concern or complaint feels that they lack the authority to achieve resolution, or feel that the upon initial investigation, the matter is more complex that first thought, then they must pass responsibility to a Supporting Headteacher or Head of Education Services.

FOR RESOLUTION AT STAGE 2 – FORMAL CONSIDERATION:
The process must be led by a Supporting Headteacher, or delegated by the Supporting Headteacher to the Schools Headteacher. The Supporting Headteacher may decide that it is more appropriate to request someone external to the school to carry out any investigation into the complaint. This remains the decision of the Supporting Headteacher in coordinating the process. At Stage 2 it may be appropriate for the investigating officer to convene a Formal Hearing in order to explore the circumstances surrounding the complaint.

Stages of the Complaints Process

All timeframes comply with Regulation 7 of ISSR (Wales), ensuring timely resolution and transparent communication.

Stage 1 – Local/Informal Resolution
Timescale: 14/28 Days

1. The Headteacher receiving the complaint or the Supporting Headteacher will resolve the matter as soon as reasonably practical and in any event within 14 days. This may be extended for a further 14 days with the agreement of the complainant. The Headteacher must reach a decision as to whether it needs to be passed on to the Supporting Headteacher within 48 hours of receiving the complaint.
2. If it is possible to resolve a complaint at Stage 1 of the process then the following processes must take place:
    a. Record a summary of the complaint and the manner in which it was resolved in the Complaints Log and in the Daily Record of any relevant child/young person;
    b. The Headteacher must confirm in writing to the complainant the agreed resolution. The person(s) about whom the complaint was made will receive the same information in writing, along with any actions requiring attention.

Stage 2 – Formal Consideration
Timescale: 35 Days (From the initial complaint)

1. Should the complaint not be able to achieve resolution at Stage 1 then the Headteacher must take steps to take the complaint to the Stage 2 formal process, and if not previously done, refer it to the Supporting Headteacher. This is either because the complaint could not be effectively resolved at the Stage 1, or the timescale could not be met, or the matter was too serious to attempt resolution at Stage 1. Agreement from the complainant is desirable to take the complaint to Stage 2, but not essential. Each case will be decided on the strength of the evidence provided.
2. Before undertaking the Formal Consideration, the Supporting Headteacher will clarify the substance of the complaint with the complainant, put it into writing and give a copy to the complainant.
3. If the complaint relates to another learner in the school then that learner's social worker, and/or parents / corporate parents will be consulted.
4. The Supporting Headteacher, or delegated lead, will seek to resolve the complaint as quickly as possible, but within the maximum 35 days of the request for the Formal Consideration. This may

be extended with the agreement of the complainant. Should an extension be required, the extenuating circumstances leading to it must be communicated to the complainant in writing.

5. Should the Supporting Headteacher decide that any investigation required to address the complaint would be best carried out by an external investigator then the Headteacher must:
    a. Appoint an appropriate external investigator without delay;
    b. Communicate the decision to use an external investigator to the complainant;
    c. Continue to maintain oversight and progress of the investigation within the timescales of the process.
6. Following completion of any investigation the Supporting Headteacher will reach his/her conclusions, and decide on outcomes, based on the strength of evidence provided by the investigation.
7. The Supporting Headteacher will notify the complainant of the outcomes of the complaint, preferably verbally, and always followed up in writing. If the complaint was justified, the complainant should be told what, if any, remedial action will be taken and an apology offered. Outcomes of an investigation into a complaint may lead to a decision to begin processes falling within other policies and procedures, but this will not prevent the complaint itself from reaching a timely conclusion.
8. The person(s) about whom the complaint was made will receive the same information in writing, along with any actions requiring attention.
9. Details of the outcomes must be recorded on the complaint record, along with all other recording of the investigation process. Once completed, this record must be signed-off by the Supporting Headteacher. Outcomes from the complaint will also be recorded in the Complaints Log. If the complaint concerned a learner in the school, a copy of the complaint record will be:
    a. Sent to the residential home for inclusion in the young person's file;
    b. Sent to the young person's social worker for inclusion in their records;
    c. Sent to the Registered Manager of the residential home for inclusion in their complaints file.
    d. Notification sent to the proprietor representative responsible for compliance.

Stage 3 – Review Panel
Timescale: 28 Days

1. If dissatisfied with the outcome of a Stage 2 Formal Investigation, a complainant may request a Stage 3: Review Panel to consider their complaint; they may also ask that their complaint be passed to the Placing Authority or Regulatory Authority. To initiate a Stage 3: Review Panel, the complainant should notify the Headteacher, either verbally or in writing; the notification will be confirmed in writing explaining the process and timescales for convening a Stage 3 Review Panel.
2. The Headteacher will ensure that:
    a. Senior managers and, if the complaint involves a learner at the school, the placing authority, and/or parents / corporate parents, are notified and briefed as necessary until the matter is resolved;
    b. The complainant is clear about the process and timescales;
    c. Where the complainant is a young person, they have access to an independent advocate or representative at the panel hearing. Young people may also be accompanied by their parents or a representative of the corporate parent. Where a parent, that they are made aware of their right to be accompanied at the panel hearing;
    d. Necessary arrangements are made for the Review Panel to be conducted in a fair and thorough manner. The Review Panel has the power to make findings and

recommendations on the complaint as suggested by the evidence presented to the panel;

e. A Review Panel is established to consider the matter. For complaints arising in the School, the review panel process will, generally, involve the Head of Education Services and 2 other members of the Senior Management Team, independent of the matter under consideration. In addition, the panel must also contain one person who is independent of both the management and running of the school. The Head of Education Services will chair the panel and report back to the Headteacher on any recommendations made by the Review Panel.
f. The Review Panel communicate their recommendations to the complainant in writing, and within the timescales for the Stage 3 process;
g. The person(s) about whom the complaint was made will receive the same information in writing, along with any actions requiring attention.
h. The recommendations of the Review Panel are included in the complaints record and filed in the school's Complaints File;
i. The process described at Stage 2 (9) (a-d) must also be completed.

Right to Independent Representation

In accordance with Welsh Government guidance, learners making complaints have the right to be supported by an independent advocate, particularly when Looked After or placed by a Welsh local authority.

Complaints made against the headteacher

Please note that in the event of a complaint being made against the Headteacher for Greenfields School is the exact same process as detailed above will be followed, but responsibility for the process will be passed straight to the Head of Education Services for CareTech.

In the event that a Stage 3 Review Panel is required, this will comprise 3 members of the Senior Management Team for CareTech Children's Services, exclusive of the Head of Education Services, and independent of the complaint under review. A chairperson will be appointed to fulfil the role as detailed in Stage 3 (2) (e) above.

Recording and reporting for the complaint will NOT be kept in the school, other than the initial entry into the Complaints Log. It will be kept as part of the Head of Education Services own Complaints File, external to the school, and on that Headteacher's personnel file.

Confidentiality

Independent School Standards (Wales) Regulations 2024 requires that:
"provides that, subject to paragraph 6(2)(j) of this Schedule, correspondence, statements and records of complaints are to be kept confidential except where the National Assembly or a body conducting an inspection under section 163 of the 2002 Act requests access to any documents relating to the complaint."

Behaviour Watch, containing a complete record and evidence of each individual formal complaint will be monitored by the Headteacher. This file is confidential and will only be made available to those people stipulated in the Standards, and on request. Findings and recommendations are available for inspection on the school premises by the proprietor and Headteacher. Records will indicate whether complaints

were resolved following a formal procedure or panel hearing. Action taken by the school as a result of the complaints will be evaluated by the proprietor to ensure improvement in practice.

Complaints records involving the Headteacher will be held in a likewise manner by the Head of Education Services.

Complaints handling will uphold the rights and dignity of learners as set out in the UNCRC and Welsh Government guidance on safeguarding, data protection and confidentiality.

Review

The policy and procedures are reviewed and updated on an annual basis, to ensure continued compliance with the Independent School Standards (Wales) Regulations 2024, and relevant guidance issued by the Welsh Government.

Headteacher:	Craig Thomas	**Date:**	1st September 2026
Proprietor:	Rob McConomy	**Date:**	1st September 2026