POLICY 14 | 2026-27

Complaints

Owner: Martha Bache, Director and Proprietor. Operational safeguarding: Martha Bache, DSL; Stephanie Selby, DDSL. Health and safety: Edwin Ralph.

Version: 2026-27.1 | Approved and effective: 17 October 2026

Approved by: Martha Bache, Director and Proprietor | Next review: September 2027, or earlier if required.

1 Purpose and principles

Crea Pax is committed to providing safe, respectful and high-quality alternative provision. Concerns and complaints are welcomed as an opportunity to resolve problems, learn and improve. Complaints will be handled fairly, proportionately, without discrimination and as promptly as reasonably possible. A learner will not be disadvantaged because they, or someone acting for them, has raised a concern or complaint.

This policy provides an accessible route for learners, parents/carers, commissioning schools and local authorities, professionals, visitors and members of the public to raise concerns about Crea Pax services, conduct or decisions.

2 Scope and exclusions

This policy applies to complaints about Crea Pax provision, staff practice, communication, service delivery, premises, activities or other matters for which Crea Pax is responsible.

Some matters must follow a different process and will be redirected immediately where appropriate:

- a safeguarding concern or concern that a child may be at risk of harm;
- an allegation or low-level concern about a member of staff, contractor or volunteer;
- a whistleblowing concern raised by a worker;
- a data protection complaint or request requiring action under UK data protection law;
- an employment, disciplinary or grievance matter; or
- a matter that is primarily the responsibility of the commissioning school, local authority, police, social care or another statutory body.

Where a complaint contains more than one type of concern, Crea Pax may separate the issues so that safeguarding, employment or statutory matters are dealt with through the correct route while the remaining complaint is considered under this policy.

Crea Pax plans to seek OCR approval but has not yet submitted an application and does not currently offer OCR qualifications. Future qualification delivery is conditional on confirmed centre and qualification approval. Complaints about service or administration follow this policy; assessment appeals and suspected malpractice follow their separate qualification procedures when applicable.

3 Accessibility and support

A complaint does not have to use legal language or a particular form. Crea Pax will make reasonable adjustments so that children, young people and adults with SEND, communication needs, literacy difficulties or other barriers can raise concerns. This may include accepting a complaint verbally, helping the person record it, using an advocate or trusted adult, or providing information in a more accessible format.

Learners are encouraged to speak to any trusted member of staff. Staff receiving a learner complaint must take it seriously, record it appropriately and ensure it reaches the correct person.

4 Stage 1 informal concern

Where appropriate, concerns should first be raised with the relevant staff member or with Martha Bache, Director / Proprietor. Many issues can be resolved quickly through clarification, discussion or an agreed action.

Crea Pax will normally aim to respond to an informal concern within 5 working days. A person may move directly to Stage 2 where the matter is serious, they are uncomfortable approaching the staff member involved, or informal resolution would not be appropriate.

5 Stage 2 formal complaint

A formal complaint should normally be sent to Martha Bache at martha@creapax.com. If the complainant cannot make the complaint in writing, Crea Pax will make reasonable arrangements to record it accurately and confirm the substance of the complaint with them.

Crea Pax will normally:

- acknowledge the complaint within 5 working days;
- clarify the issues and the outcome sought where necessary;
- consider relevant records and speak with relevant people;
- keep an open mind and avoid prejudging the outcome;
- protect confidential and safeguarding information; and
- provide a written outcome normally within 15 working days of acknowledgement.

If more time is reasonably required because of complexity, staff absence, safeguarding or another external process, the complainant will be told the reason and given a revised timescale. The outcome will explain whether the complaint is upheld, partly upheld or not upheld, any appropriate action, and how to request a review.

6 Complaints about the Proprietor

Where a complaint concerns Martha Bache personally, she must not investigate or decide it. Contact Stephanie Selby, DDSL, at steph@creapax.com to coordinate the response and arrange a suitably independent reviewer, or contact the commissioning school or local authority directly. Steph is the initial contact, not the independent reviewer. Reviewers must be uninvolved in the events and disclose conflicts, including personal and family connections. An alternative is appointed where impartiality could be undermined. Safeguarding allegations follow the safeguarding and LADO route immediately.

7 Stage 3 review

If the complainant remains dissatisfied with the Stage 2 outcome, they may request a review, normally within 10 working days of receiving it. The request should explain why they believe the complaint was not handled fairly or adequately.

The review will focus on whether the complaint was investigated fairly, relevant information was considered, conclusions were reasonable on the available evidence, and appropriate action was identified. Wherever reasonably practicable, the review will be undertaken by a person who was not involved in the original investigation. Crea Pax will normally issue the review outcome within 15 working days. This concludes the internal Crea Pax complaints process.

8 Safeguarding and allegations

Safeguarding is not delayed while a complaint is investigated. Any information suggesting that a child may be at risk of harm must be passed immediately to the DSL or DDSL and managed under the Safeguarding and Child Protection Policy. Allegations about adults working with children are considered under safeguarding procedures, including referral to the relevant Local Authority Designated Officer (LADO) where the threshold is met. Emergency concerns must be referred to emergency services without delay.

9 Commissioning schools and local authorities

Crea Pax works in partnership with commissioning schools and local authorities. A complaint may need to be shared with the commissioner where it concerns the placement, commissioned service, attendance, safeguarding, funding or contractual arrangements, or where the commissioner has its own complaint or quality-assurance responsibilities. Information will be shared on a lawful and need-to-know basis.

Nothing in this policy prevents a complainant from contacting the commissioning school, local authority, safeguarding service, police, Information Commissioner or another competent body where that route is appropriate. Crea Pax will not state that its internal process must be completed first where law, safeguarding or the external body permits direct contact.

For a complaint about an OCR qualification delivered under confirmed approval, the internal complaints route and the correct qualification procedure normally apply before referral to Cambridge OCR. OCR publishes complaints@ocr.org.uk and its current students, parents and carers complaints guidance. Crea Pax checks the applicable awarding-body route and timescales at the time; a complaint is not a substitute for an assessment appeal, malpractice or reasonable-adjustment process.

10 Confidentiality and fairness

Complaints will be handled with appropriate confidentiality. Information will be shared only with those who need it to consider the complaint, safeguard a person, obtain professional advice or meet a legal or commissioning requirement. The person complained about will normally be given a fair opportunity to respond, subject to safeguarding, legal and confidentiality restrictions.

Crea Pax will distinguish between fact, allegation, opinion and professional judgement and will keep an appropriate record of the evidence considered and the reasons for decisions.

11 Anonymous complaints

Anonymous complaints will be considered according to the seriousness, credibility and information available. The absence of a named complainant may limit the investigation, but it will never prevent action where safeguarding, safety or other serious concerns are identified.

12 Persistent, unreasonable or abusive behaviour

Crea Pax will not label a complaint unreasonable merely because it is persistent, challenging or critical. However, proportionate communication arrangements may be introduced where behaviour becomes abusive, threatening, discriminatory, excessively repetitive, or places unreasonable demands on staff after the issues have been fully addressed. Measures may include a single point of contact, agreed communication method or reasonable limits on frequency. Any restriction will be explained and kept under review. Threats or immediate safety concerns may be referred to the police.

13 Records and data protection

Crea Pax will keep an appropriate record of formal complaints, investigations, outcomes, actions and learning. Complaint records will be stored securely and access restricted. Retention will follow the Crea Pax retention schedule, legal requirements and any applicable commissioning or insurance requirements rather than a single blanket period for every complaint.

Personal data will be processed in accordance with the Crea Pax Data Protection & GDPR Policy. Complaint responses may withhold or redact third-party, safeguarding, employment or other confidential information where disclosure would be inappropriate or unlawful.

14 Learning and service improvement

The Proprietor reviews complaints and concerns for recurring themes, safeguarding implications, training needs, communication issues and opportunities to improve policy or practice. Relevant learning may lead to changes in risk assessments, staff guidance, procedures or commissioning discussions. Lessons will be shared with staff where appropriate without unnecessary disclosure of personal information.

15 Monitoring and review

This policy will be reviewed at least annually and sooner where a complaint identifies a procedural weakness, the service changes materially, or relevant legislation, statutory guidance or commissioning requirements change.

Related documents

Safeguarding and Child Protection Policy 2026; Staff Behaviour / Code of Conduct Policy 2026; Whistleblowing Policy 2026; Data Protection & GDPR Policy 2026; Health & Safety Policy 2026; Behaviour & Anti-Bullying Policy 2026.