



STARFISH AP
The Starfish Way
Complaints Policy
Academic Year 2026–2027

Item	Details
Document Title	Complaints Policy
Organisation	Starfish Alternative Provision
Academic Year	2026–2027
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Policy Owner	Chloe Fox – Director & Head of Provision
Applies To	Pupils, parents/carers, commissioning schools, Local Authorities, partner agencies, visitors, members of the public and professionals working with or on behalf of The Starfish Hub
Date Approved	Sep 2026
Review Date	Sep 2027
Next Review	Annually, or sooner following legislative or organisational changes

Document Purpose

This policy sets out The Starfish Hub's approach to receiving, responding to, investigating and resolving concerns and complaints.

At The Starfish Hub, we believe that positive relationships are built through trust, honesty, transparency and respectful communication. We recognise that concerns and complaints can arise even within strong relationships and that listening carefully to feedback helps us strengthen our practice and improve outcomes for children and families.

We are committed to ensuring that all concerns and complaints are handled fairly, sensitively, consistently and within reasonable timescales. Wherever possible, we seek to resolve concerns through open dialogue, restorative conversations and collaborative problem-solving before moving to formal procedures.

This policy establishes a clear process for raising concerns, making complaints, conducting investigations and reviewing outcomes whilst ensuring that the welfare of children remains central throughout.

This policy should be read alongside The Starfish Hub's Safeguarding & Child Protection Policy, Staff Code of Conduct, Data Protection & Information Governance Policy and the wider policies forming part of The Starfish Way Governance & Practice Framework.

The Starfish Way

At The Starfish Hub, we believe that every voice deserves to be heard. Strong relationships are not built because difficulties never occur. They are built because concerns can be raised openly, listened to respectfully and resolved constructively.

We understand that raising a concern can sometimes feel difficult. Families, pupils and professionals need confidence that they will be listened to fairly and treated with dignity throughout the process.

The Starfish Way is built upon eight guiding principles:

Safety

Children, families and staff should feel safe to raise concerns without fear of blame or dismissal.

Trust

Trust grows when concerns are acknowledged honestly and addressed appropriately.

Attunement

We seek to understand experiences, perspectives and feelings before reaching conclusions.

Regulation

Concerns are managed calmly, professionally and proportionately.

Flexibility

We recognise that different situations may require different approaches to resolution.

Inclusion

Everyone should have equitable access to the complaints process.

Support

We work collaboratively with families, schools and professionals to find solutions. Humanity

Every interaction is rooted in dignity, empathy, compassion and respect.
When concerns arise, we do not simply ask:

"Who is at fault?"

Instead, we ask:

"What has happened, who has been affected, what needs to be understood, and how can we move forward in a way that restores confidence and strengthens relationships?"

Scope

This policy applies to concerns or complaints raised by:

- Parents and carers.
- Pupils where appropriate.
- Commissioning schools.
- Local Authorities.
- Partner agencies.
- Visitors.
- Members of the public.
- Professionals working with or on behalf of The Starfish Hub.

The policy applies to concerns relating to:

- Educational provision.
- Communication.
- Staff conduct.
- Operational decisions.
- Services provided by The Starfish Hub.
- The implementation of policies and procedures.

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The policy applies to concerns relating to:

- Educational provision.
- Communication.
- Staff conduct.
- Operational decisions.
- Services provided by The Starfish Hub.
- The implementation of policies and procedures.
- Criminal matters.
- Employment grievances.
- Data protection complaints referred directly to the Information Commissioner's Office (ICO).

Where concerns fall outside this policy, The Starfish Hub will support individuals to access the appropriate process wherever possible.

Safeguarding

The welfare and safety of children will always take priority.

Where a complaint raises a safeguarding concern, the matter will be managed in accordance with The Starfish Hub's Safeguarding & Child Protection Policy. Safeguarding procedures may run alongside the complaints process where appropriate.

No complaint investigation will compromise the immediate safety or wellbeing of a child.

Principles of Complaints Handling

The Starfish Hub is committed to ensuring that all complaints are handled in accordance with the following principles.

We will:

- Listen carefully and respectfully.
- Treat all parties fairly.
- Remain objective and impartial.
- Communicate clearly and honestly.
- Maintain appropriate confidentiality.
- Investigate concerns proportionately.
- Keep individuals informed of progress.
- Seek solutions wherever possible.
- Learn from feedback and experience.

We ask complainants to:

- Raise concerns promptly where possible.
- Provide accurate information.
- Work constructively with the process.
- Communicate respectfully with staff.
- Allow investigations to take place without interference.

Timescales

Complaints should normally be raised within three months of the incident occurring. Where concerns relate to a series of incidents, complaints should normally be raised within three months of the most recent event.

The Director and Head of Provision may exercise discretion where exceptional circumstances apply.

Where investigations require additional time, complainants will be informed of:

- The reason for the delay.
- Any interim actions being taken.
- The revised timescale.

Stage 1 – Early Resolution

The Starfish Hub believes that most concerns can be resolved through respectful conversation and collaborative problem-solving.

Individuals are encouraged to raise concerns with the most appropriate member of staff at the earliest opportunity.

Concerns may be raised:

- In person.
- By telephone.
- By email.
- In writing.

The concern will normally be acknowledged within three working days.

Staff will seek to:

- Understand the concern.
- Clarify information where necessary.
- Explore possible solutions.

- Agree actions where appropriate.
- Provide a response within five working days wherever possible.

Where a concern cannot be resolved through Early Resolution, it may progress to Stage 2.

Stage 2 – Formal Complaint

Where a concern remains unresolved, a formal complaint may be submitted to the Director and Head of Provision.

Where possible, the complaint should include:

- A description of the concern.
- Relevant dates and times.
- Names of individuals involved.
- Supporting evidence where available.
- Details of any actions already taken.
- The outcome being sought.

The Director and Head of Provision, or an appointed investigating officer, will:

- Acknowledge receipt of the complaint.
- Review available information.
- Speak with relevant individuals.
- Consider evidence fairly and objectively.
- Reach findings based upon the information available.
- Provide a written response.

A written response will normally be provided within ten working days.

Where additional time is required, the complainant will be informed accordingly.

Stage 3 – Review

If the complainant remains dissatisfied following Stage 2, they may request a formal review. Requests should normally be submitted within ten working days of receiving the Stage 2 outcome. The review will be conducted by an individual or panel not previously involved in the complaint wherever possible.

The review process will consider:

- Whether procedures were followed appropriately.
- Whether the investigation was fair and proportionate.

- Whether relevant evidence was considered.
- Whether the outcome was reasonable.

The reviewer may:

- Uphold the original decision.
- Amend the findings.
- Recommend further investigation.
- Recommend additional actions.

The outcome of the review will normally be communicated within twenty working days. The review stage represents the final stage of The Starfish Hub's internal complaints procedure.

Complaint Outcomes

Following investigation, complaints may be:

- Upheld.
- Partially upheld.
- Not upheld.
- Resolved through agreement.

Outcomes may include:

- Clarification or explanation.
- An apology.
- Agreed actions.
- Procedural changes.
- Staff guidance or training.
- Improvements to communication.
- Service improvements.
- Recommendations for future practice.

Where shortcomings are identified, The Starfish Hub will seek to implement improvements and reduce the likelihood of recurrence.

Complaints Raised by Pupils

Pupils are encouraged to share worries, concerns and complaints with trusted adults.

Where appropriate, children will be supported to:

- Express their views.
- Participate in discussions.
- Understand outcomes.
- Access advocacy or support.

Staff will ensure that children are listened to in ways that are developmentally appropriate and responsive to their individual needs.

Anonymous Complaints

Anonymous complaints will be considered where sufficient information is available to allow a meaningful investigation.

The decision to investigate an anonymous complaint will be based upon:

- The seriousness of the concerns.
- Potential safeguarding implications.
- The availability of evidence.

Persistent, Unreasonable or Vexatious Complaints

The Starfish Hub recognises that the overwhelming majority of complaints are raised genuinely and in good faith. However, there may be occasions where the manner in which a complaint is pursued becomes unreasonable.

Examples may include:

- Repeated complaints regarding issues already fully investigated.
- Excessive correspondence.
- Aggressive or abusive communication.
- Unreasonable demands on staff time.
- Refusal to engage with reasonable outcomes.

Where this occurs, The Starfish Hub may:

- Nominate a single point of contact.
- Limit communication methods.
- Decline to respond to repetitive correspondence raising no new issues.
- Take reasonable steps to protect staff wellbeing.

Any action taken will be proportionate, fair and appropriately recorded.

Record Keeping

The Starfish Hub will maintain accurate records of formal complaints.

Records may include:

- Complaint correspondence.
- Investigation notes.
- Evidence reviewed.
- Actions taken.
- Decisions reached.
- Outcomes communicated.

Records will be maintained securely in accordance with the Data Protection & Information Governance Policy.

Equality and Accessibility

The Starfish Hub is committed to ensuring that all individuals can access the complaints process fairly.

Reasonable adjustments will be made where required to support:

- Disability.
- Communication needs.
- Literacy needs.
- Language needs.
- SEND.
- Additional vulnerabilities.

No individual will be disadvantaged when raising a genuine concern or complaint.

Learning and Improvement

Complaints provide valuable opportunities for reflection and organisational improvement. Senior leaders will review themes and trends arising from complaints to identify:

- Areas of good practice.
- Emerging concerns.
- Training needs.
- Opportunities for service improvement.

Learning from complaints will contribute to ongoing development across The Starfish Hub.

Monitoring and Review

The Director and Head of Provision will monitor the implementation of this policy to ensure that complaints are managed fairly, consistently and effectively.

This policy will be reviewed annually, or sooner where legislative, regulatory or organisational changes require amendment.