YSGOL ARAN HALL SCHOOL
part of the SENAD Group

714ARAN

Complaints and Representations Policy – Aran Hall School

Policy Section Number	7
Dated	November 2026
Reviewed	November 2026
Version Number	7
Next Review Date	September 2027
Related Policies and Guidance Documents	714E Complaints and Representations - England 519 Complaints Policy – Adults Homes and Senad Community
Related Regulations	Framework for Inspection of Adult and Children's Services (2016)
Annexes and Supplementary Info	
Policy Owner	Sara Forsyth
Document History	
Date	**Revisions**
October 2025	**P2** Framework for Inspection of Adult and Children's Services (2016) added; **P11** 2024-2025 Complaints added;
December 2025	Front Page - Policy owner updated; **P3** last sentence amended; **P8** Director of Education updated
August 2026	**P1** Formatting adjusted **P11** Data table extended
November 2026	**P11** Table updated with 25/26 figures

Complaints and Representations Policy – Welsh Schools

Contents

Contents 1
Equality Act 2010 2
Aims 2
How complaints are received 2
The Five Stages: Procedures for resolving complaints and timescales 5
Staff complaints about other staff practice/conduct 6
Minor complaints 7
Complaints about the Senior Leadership Team 8
The School's/Home's Inspectorate 8
Statutory references 9
The Independent School Standards (Wales) Regulations 2024 9
Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017 ... 10
(b)having regard to that analysis, identify any areas for improvement. 10
Number of complaints (education) by school 11

This policy is published on SENAD's website to comply with regulations about access to information for parents

Equality Act 2010

SENAD and its Schools/Homes will make reasonable adjustments to accommodate complainants to ensure they have access to this policy. If a complainant requires a modification to this policy, this should be raised so that the School/Home may make reasonable adjustments. Such changes will be documented.

The number of complaints received by each school is set out at the end of this policy.

Aims

SENAD through its schools aims to provide a happy, safe and caring environment that will enable the young people to learn and communicate with confidence. This complaint's policy is designed to allow parents (and others) to raise issues of concern/complaint with the school as set out in *"The Independent School Standards (Wales) Regulations 2024".*

However, there may be times when a young person, their parents/guardians or any other person who comes into contact with the school/home may wish to make a complaint about any aspect of the school or care home. We encourage comments from all, so that we may improve the service we deliver. We acknowledge that complaints do occur and respect those who do complain or comment and we seek to respond in a positive and open manner. There are **no** restrictions on the issues that a student or adult can make a complaint about.

This policy meets:

Part 7 of the *Independent Schools Standards Wales Regulations 2024*

Regulation 64 Regulated Services (*Service Providers and Responsible Individuals*) (*Wales*) *Regulations 2017*

SENAD's Welsh school and the associated children's home operates within the guidelines set out in the Framework for Inspection of Adult and Children's Services (2016), which promote good practice, and the Independent School Registration Regulations. **This policy is the formal written complaints procedure for the School and the Children's home**

The policy will be available to young people, parents and any interested person at individual establishments or through SENAD, head office.

Complaints will be managed within the timeframes set out in this through the 5 stages of complaints resolution.

How complaints are received

All complaints by parents/guardians, students or any other person are to be made to a member of the School or Care Home's staff and will be recorded as a concern and passed to a member of the management team (education, care and therapy) for response.

A **central register** is kept in the school and children's home of all complaints made and monitored regularly by the School's Senior Leadership Team.

The Senior Leadership Team decides who is best placed to investigate the complaint and that person act without bias.

Any person is entitled to make a complaint about any aspect of the School/Children's Home or their experiences of it. This includes people who are not directly involved with the School/Home (e.g. members of the public, independent advocates etc). Their complaints or representations should initially be taken by the staff in the School Office or with a School/Home manager and then they should proceed according to the procedures detailed in the following advice.

Young people may have difficulties with speech, language and communication. Therefore, making a complaint may be a difficult task for them to manage themselves. Anyone reviewing a complaint from a young person or advocating on their behalf should take account of these difficulties and employ communication strategies suited to the young person's needs.

When a person needs to register a major complaint or representation, the member staff who has worked with the person or parent making a complaint will contact a member of the Senior Leadership Team at the earliest opportunity (normally within 24 hours).

The Senior Leadership Team will consider the content of the complaint and decide on action to be taken. **Where a complaint involves Child Protection/safeguarding issues then the Designated Safeguarding Lead (DSL) will be responsible for following the school/homes child protection and safeguarding policy within 24 hours of receiving the complaint.**

When a young person wants to make a minor complaint about any aspect of school/home, this should be dealt with by talking to the key care worker, teacher, Head of Education, Head of Care, House Manager or, indeed, any staff member in the school. All staff have a duty of care to the young people, and should be an advocate for the young person.

Examples of (but not limited to) minor complaints are:

- A person is unhappy with the food that s/he has been served
- A person is unhappy with the variety of after-school activities that are offered
- A person feels that the pillows that are offered are too lumpy
- That the classroom is too hot/cold/bright/dark
- The child's bedroom has not been decorated correctly
- The soft play area is not accessible at an agreed time for the young person

If the complaint is of a more serious nature it will be acted upon by a member of the Senior Leadership Team according to the procedures that follow. The person making a complaint also has access to outside advice and this right should be made aware to the person making a complaint by the person they are making the complaint to.

Examples of more serious complaints (these which should be referred to the Senior Leadership Team without undue delay) are:

- A student/resident or their representative believes themselves to be the target for bullying by his/her peers
- A student/resident or their representative believes themselves to be the subject of abuse or bullying by any adult (including their home setting)
- A person feels that the needs of a student are consistently overlooked or not met
- A member of staff fails to deliver a promised commitment to a parent/child/external professional

At all stages it must be made clear to the person making a complaint that there will be no reprisals against them as a result of making a complaint.

At all stages complaints should be made in confidential surroundings and the privacy and dignity of the complainant should be protected.

A child, young person who raises a complaint or representation **will not be subject to any criticism or sanction for raising the complaint**.

Where a child's complaint is found to be malicious, this will be addressed with parents and social workers and not through the school/home's consequences policy.

The Five Stages: Procedures for resolving complaints and timescales

Complaints and concerns received by staff will be acted upon by that member of staff or passed on to the relevant staff for action. In either case appropriate 'Concern' form (or equivalent) needs to be completed and the complaint recorded in the School/Home complaint book.

There are five (5) possible stages to the complaints procedure as follows:

1) ***Informal stage***: discussion between the complainant and a member of the School's staff. This is may be a minor complaint and one which can be dealt with very quickly by the member of staff concerned. This is typically done within 5 working days.

2) ***Formal stage*****:** if the complainant is not satisfied, he or she can put their complaints in writing to the School or Home manager who will inform the Senior Leadership Team, who will nominate a member of staff to investigate the complaint.

   Within 10 working days (care) or 10 school days (education) the nominated member of the Senior Leadership Team must either inform the complainant of a decision, or tell the complainant when a decision will be made.

   This stage will have included consultation with the person making a complaint.

   Once the complaint or representation has been resolved the nominated member of the Senior Leadership Team will write to the person making a complaint, to outline the resolution.

   Where a complaint or representation takes longer than 10 school/working days to resolve, records showing ongoing communication with the person making a complaint should be filed with the original complaint.

3) ***Reconciliation stage*****:** if the complainant remains dissatisfied, the Principal must try to resolve the matter. Within 10 school/working days, the Principal must either inform the complainant of a decision, or tell the complainant when a decision will be made.

4) ***Proprietor non-hearing stage*****:** if the complainant remains dissatisfied, the head of establishment will refer the issue to SENAD, the proprietor.

   A senior manager from SENAD will seek to resolve the complaint within 10 school/working days, or if this will take longer, inform the complainant when a decision will be made.

   If the complaint is not resolved as this stage, then the complainant will be offered a 3-person panel hearing under stage 5.

   The SENAD senior manager may choose to bypass this stage and move straight to a 3-person panel hearing under stage 5.

5) ***Hearing Panel stage*****:** if the complainants wish the matter to be considered further, a hearing before a panel of at least 3 people who were not directly involved in

previous determination of stages 1, 2 or 3 of the complaint will be arranged (regulation 33e). The panel will be held in accordance with Part 7 of the *Education Independent Schools Standards (Wales) 2024*. To that end:

a) SENAD as the proprietor is responsible for the appointment of the panel (Regulation 7f Wales)

b) One person on the panel will be independent of the management and running of the establishment (that is the school's day-to-day running or the Director group at SENAD). Typically, SENAD will seek all panel members to be independent of the School/Home. (Regulation 7g Wales)

c) The complainant may attend the panel, and if so wished be accompanied, with all costs for attendance being for the complainant's sole account (Regulation 7h Wales). Reasonable adjustments will be made under the expectations of the Equality Act 2010.

d) The panel's chair will agree typically within 10 school/working days of receiving the appeal to panel, a hearing date with the complainant, subject to the complainant being contactable.

e) This hearing date will typically be within 28 school/working days of the date of appeal unless Safeguarding requirements necessitate that the complaints procedure is suspended until a Safeguarding matter is resolved. Once resolved, the complaints procedure timetable will restart from the time it was suspended.

f) The panel will hear the complaint and make its findings known to the complainant in writing (by way of letter or email), and where relevant the individual the person complained about, typically within 10 school/working days. (Regulation, 7i Wales)

g) The findings and recommendations are available for inspection on the school premises by the proprietor and the Head Teacher. (Regulation 7i Wales)

h) All the complaints, the outcomes and actions taken will be recorded in the settings complaint register and made available for inspection on the school premises by the proprietor, head teacher and regulatory authorities. They will indicate whether the complaint was resolved at the preliminary stage or preceded to a panel hearing. (Regulation 7j Wales)

i) Complaint records will be stored confidentially. They will also be made available to Estyn and the Secretary of State. (Regulation 7k Wales)

j) The SENAD panel is the final arbiter of complaints.

Staff complaints about other staff practice/conduct

Complaints from staff about other staff (i.e. grievances) will be managed through the staff complaints and grievance procedure set out in the staff handbook.

Where it is an **issue of conduct that may affect the welfare of a child, then the Child Protection and Safeguarding Policy 506ARAN will be used.** Where a referral is made to safeguarding, then the process may be paused until any safeguarding issues are dealt with.

Once this process is completed, the complaint may then be referred back to the staff conduct procedures (disciplinary and/or grievance).

Minor complaints

Minor complaints and representations made by young people and parents in social care must be logged in **The Complaints Book** kept on the Residential Houses with a record of how they have been addressed.

All entries should be signed and dated by the member of staff addressing the complaint. The Complaints Book should be kept in a locked cupboard when not in use. The central log of complaints kept for formal complaints also provides a central record of all minor complaints as well.

For non-resident young people and their parents, minor complaints and representations can be made to the teaching team- teacher/SLT/Learning Support Assistant (LSA). These will be dealt with in the same manner as above, by completing **The Complaints Book.** This book will be kept in a secure place designated by the Head Teacher.

The Senior Leadership Team will review the contents of the Complaints Books on a regular basis. Where there are inaccuracies or discrepancies discovered the Senior Leadership Team, this will be investigated for the cause of the inaccuracies or discrepancies.

More serious complaints and representations should be addressed to, and will be acted upon by, the Senior Leadership Team.

These will be made and recorded using the establishments' formal documentation**. NB It is not generally expected that a young person will complete documentation**.

An adult advocate is available to do this for them. However, where a young person particularly wishes to complete their own documentation, they should be provided with the appropriate documentation.

Examples of serious complaints may be:

- A person believes that a member of staff has abused their position with students **– THIS IS SAFEGUARDING!**
- A person believes that an act of abuse (in whatever form) has been perpetrated by a staff member **– THIS IS SAFEGUARDING!**

Where an issue of safeguarding is raised, then SENAD or the School/Home will raise the issue through the safeguarding policy first, before addressing the complaint.

Complaints about the Senior Leadership Team

Complaints and representations about the heads of establishment and/or the Senior Leadership Team should be made directly to the Director of Social Care - Mark Ryder or the Director of Education - Sara Forsyth or the Group HR Director - Victoria Finn. They can be contacted as follows:

Email info@senadgroup.com or 01332 378 840

In Writing SENAD Group Ltd
1 St George's House
Vernon Gate
DERBY
DE1 1UQ

The School's/Home's Inspectorate

The School and children home's inspectorate is **CIW/Estyn** in Wales. They can be contacted directly as follows:

Estyn (for Aran Hall School Education)
Anchor Court
Keen Road
Cardiff
CF24 5JW

enquiries@estyn.gov.uk or 02920 446 446

CIW North Wales Region, (for Aran Hall School Children's Home)
Government Buildings,
Sarn Mynach,
Llandudno Junction
LL31 9RZ

Telephone: 03000 625 609
Fax: 03000 625 030
Email: CIW.North@wales.gsi.gov.uk

Other contacts

The telephone numbers of outside agencies which can help young people are displayed around the school and are as follows:

Kelly Watson SENAD Group Quality & Compliance Manager	01332 378 840 info@senadgroup.com
Childline (run by NSPCC)	0800 11 11
NSPCC help for adults	0800 800 5000

Statutory references

NATIONAL ASSEMBLY FOR WALES STATUTORY INSTRUMENTS 2024

EDUCATION, WALES

The Independent School Standards (Wales) Regulations 2024

The Independent School Standards (Wales) Regulations 2024 (legislation.gov.uk)

The manner in which complaints are to be handled

The manner in which complaints are handled meets the standard if the proprietor ensures that the independent school draws up and effectively implements a complaints procedure which—

(a) is in writing,

(b) is made available on the independent school's website, or where the independent school does not have a website, it is provided to pupils or boarders, the parents of pupils or boarders and of prospective pupils or boarders at the independent school,

(c) sets out clear time scales for the management of a complaint,

(d) provides an opportunity for a complaint to be made and considered initially on an informal basis,

(e) where the parents, pupils or boarders are not satisfied with the response made in accordance with sub-paragraph (d), or wish to pursue a formal complaint, establishes a procedure for the complaint to be made in writing,

(f) where the parents, pupils or boarders are not satisfied with the response to the complaint made in accordance with sub-paragraph (e), makes provision for a hearing before a panel appointed by or on behalf of the proprietor and consisting of at least three people who were not directly involved in the matters detailed in the complaint,

(g) stipulates that, where there is a panel hearing of a complaint, one person will be independent of the management and running of the independent school,

(h) allows for the parents, pupils, or boarders to attend and to be accompanied at a panel hearing if they wish,

(i) provides for the panel to make findings and recommendations and stipulates that the complainant, proprietor and head teacher, and where relevant the person complained about, are each provided a copy of any findings and recommendations,

(j) provides for written records to be kept, in accordance with the independent school's policy on data retention, of all complaints, including whether they are resolved at the preliminary

stage or proceed to a panel hearing and any action taken by the independent school as a result of those complaints and whether they were upheld,

(k) provides that, subject to paragraph 28(3)(d) of this Schedule, correspondence, statements and records of complaints are to be kept confidential except where the Welsh Ministers or a body conducting an inspection under section 163 of the 2002 Act requests access to any documents relating to the complaint, and

(l) where the independent school provides boarding accommodation, complies with the National Minimum Standards for Boarding Schools, or where applicable, the National Minimum Standards for Residential Special Schools.

Regulated Services (Service Providers and Responsible Individuals) (Wales) Regulations 2017

Complaints policy and procedure

64.— (1) The service provider must have a complaints policy in place and ensure that the service is operated in accordance with that policy.

(2) The service provider must have effective arrangements in place for dealing with complaints including arrangements for—

(a)identifying and investigating complaints;

(b)giving an appropriate response to a person who makes a complaint, if it is reasonably practicable to contact that person;

(c)ensuring that appropriate action is taken following an investigation;

(d)keeping records relating to the matters in sub-paragraphs (a) to (c).

(3) The service provider must provide a summary of complaints, responses and subsequent action to the service regulator within 28 days of being requested to do so.

(4) The service provider must—

(a)analyse information relating to complains and concerns; and

(b)having regard to that analysis, identify any areas for improvement.

Number of complaints (education) by school

SENAD schools have an official complaints policy which is operated by the Head Teacher/Principal and overseen by SENAD as the proprietor. The formal procedure has been used as follows in EDUCATION:

SENAD School	2025/26		2024/25		2023/24		2022/23		2021/22		2020/21		2019 /20	
	Panel level	No.	Panel level	No.	Panel Level	No.	Panel Level	No.	Panel Level	No.	Panel Level	No.	Panel level	No.
Aran Hall School	0	2	0	1	0	4	0	0	0	0	0	1	0	2

Note:

1. Data is collected in September each year for the previous academic year

Children's homes complaints

- A summary of children's homes complaints is available for Social Care inspectors as part of the CIW registration of a children's home.