



Broomsdale House

COMPLAINT PROCEDURE

For a 3-Bedded Residential Children's Care Home | In accordance with The Children's Homes (England) Regulations 2015 | A clear, accessible, and transparent process for raising and resolving concerns at Broomsdale House.

23 Broomsdale Road
Batley
WF17 6PF

Date: August 2026
Prepared by: C2 Homes Planning Consultancy

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1. Introduction

This Complaint Procedure ensures that concerns and complaints about Broomsdale House, 23 Broomsdale Road, Batley, WF17 6PF, are dealt with fairly, efficiently, and in full compliance with Regulation 39 of The Children's Homes (England) Regulations 2015. We are committed to transparency, accountability, the rights of children in our care, and continuous improvement through every concern raised.

We welcome complaints as a genuinely valued source of learning and treat them as opportunities to improve our service. No child at Broomsdale House will ever experience any negative consequence for raising a concern or making a complaint. Our complaints culture is one of genuine openness, honesty, and continuous improvement — not defensiveness or blame.

This procedure is actively promoted throughout the home — displayed prominently, included in the Children's Guide, discussed with every child in their first keyworker session within 48 hours of arrival, and shared with parents and placing authorities at the commencement of every placement.

This procedure reflects the requirements of Regulation 39 of The Children's Homes (England) Regulations 2015, which requires the registered person to ensure that a suitable complaints procedure is established and operated effectively at all times.

All information about this procedure is made available in accessible formats — including easy-read, large print, audio, and translation — upon request. We will make all reasonable adjustments to ensure every complainant can access and use this procedure without facing unnecessary barriers.

2. Legal Framework

This procedure is fully compliant with the following legislation, regulations, and statutory guidance:

- The Children's Homes (England) Regulations 2015 — Regulation 39 (Complaints and Representations)
- The Children Act 1989 and the Children Act 2004
- The Children and Young Persons Act 2008
- The Guide to the Children's Homes Regulations including the Quality Standards (Ofsted — current version)
- The Care Standards Act 2000
- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018
- Working Together to Safeguard Children (2023)
- The Children Act 1989 Guidance and Regulations, Volume 5: Children's Homes
- Human Rights Act 1998
- Equality Act 2010

This home is fully committed to operating this complaints procedure in a manner that upholds the rights of every child, family member, and professional to raise concerns freely, safely, and with the expectation of a fair and meaningful response.

3. Purpose and Scope

3.1 Purpose

The purposes of this Complaint Procedure are to:

- Provide a clear, accessible, fair, and transparent process for making and resolving complaints about any aspect of this home.
- Ensure all complaints are taken seriously, treated with dignity and fairness, and dealt with promptly and professionally.
- Enable children, their families, placing authorities, and all stakeholders to raise concerns freely without any fear of victimisation or negative impact on their care or placement.
- Create a genuine culture of openness and learning in which complaints are welcomed as opportunities to improve.
- Identify areas requiring change or improvement in our policies, practices, staffing, and physical environment.
- Maintain the highest standards of residential childcare and safeguarding for all children.
- Fulfil all legal and regulatory obligations under the Children's Homes (England) Regulations 2015.

3.2 Scope

This procedure applies to complaints about any aspect of this home, including:

- The quality, safety, or appropriateness of care provided to any child.
- The conduct, behaviour, attitude, language, or professional standards of any member of staff.
- Decisions made by the home regarding a child's care, daily life, activities, contact, or placement.
- Policies, procedures, and their application within the home.
- The physical facilities, environment, cleanliness, or maintenance of the property.
- Communication, information sharing, and responsiveness with families and placing authorities.
- Any other matter relating to the management, governance, or operation of the home.

This procedure does not replace the home's Safeguarding Policy and Procedures. Where a complaint raises a concern about the safety or welfare of a child, safeguarding procedures take immediate and absolute precedence.

4. Who Can Make a Complaint

The following persons are entitled to make a formal complaint about this home:

- Any child who resides at or who has previously resided at this home.
- Parents, guardians, or persons with parental responsibility for a child placed at the home.
- Family members, relatives, or other persons significant to a child in the home.
- Social workers, Independent Reviewing Officers, and other professionals involved in a child's care.
- Independent advocates acting on behalf of a child.
- Placing authority commissioning officers, placement co-ordinators, and contract managers.
- Members of the public with a legitimate and demonstrable interest in the welfare of a child.
- Members of the staff team — through the Whistleblowing Policy in the first instance.

Every child at this home is provided with individually appropriate support to make a complaint, including: access to an independent advocate at any stage; assistance from a trusted staff member of their choosing; written information in their preferred format; and clear, genuine, repeated reassurance that making a complaint will have no negative impact on their care or placement.

5. Types of Complaints

5.1 Informal Concerns

Minor concerns or everyday issues resolved quickly and informally through direct conversation with a member of staff or the Registered Manager. Informal concerns are recorded in the complaints log with a brief note of the resolution. Staff are trained to receive concerns with empathy, warmth, and professionalism — seeing every concern as a valuable part of the home's feedback culture.

5.2 Formal Complaints

Concerns of a more serious nature requiring formal investigation, a written response, and clear communication of findings and outcome. All formal complaints follow the three-stage process in Section 7 and are recorded in the home's central complaints register.

5.3 Safeguarding Concerns

Any concern raising questions about the safety, welfare, or wellbeing of a child is treated immediately as a safeguarding matter. All such concerns are reported without delay to: the Registered Manager; the child's social worker and placing authority; the LADO where a staff member is implicated; Ofsted within 24 hours; and West Yorkshire Police where the threshold for police involvement is met. Safeguarding procedures take absolute precedence at all times.

5.4 Whistleblowing

Where a concern is raised by a staff member about the conduct of the home, management practices, financial irregularities, or safeguarding matters, the home's Whistleblowing Policy applies in the first instance. This policy provides explicit guidance on raising concerns confidentially and without fear of detriment.

5.5 Representations

In addition to formal complaints, this home welcomes representations — positive or constructive observations about the service — from children, families, and professionals. Representations are recorded and treated as valuable quality improvement information.

6. How to Make a Complaint

Complaints may be made through any of the following channels:

- In person: Speaking directly to any member of staff, the Registered Manager, or the Responsible Individual.
- In writing: By letter or email addressed to the Registered Manager.
- By telephone: By calling the home and speaking to the Registered Manager or senior staff member.
- Via a complaint form: Available at the home in standard and easy-read formats.
- Through an independent advocate: Available to any complainant at any stage, free of charge.
- Via a third party: Social workers, family members, IROs, or others with the child's consent.

6.1 Accessibility and Reasonable Adjustments

Comprehensive information about this procedure is: displayed prominently in communal areas throughout the home; included in the Children's Guide provided to every child on arrival; discussed individually with each child in their first keyworker session; included in the home's Statement of Purpose; shared with parents and placing authorities at the commencement of every placement; and available in accessible formats — large print, easy-read, audio, and translation — upon request.

This home will make all reasonable adjustments to ensure every complainant can access and use this procedure without facing unnecessary barriers — including those with disabilities, communication difficulties, or needs for interpretation services.

7. Complaint Procedure — Stages

The complaint procedure at this home consists of three clear, graduated stages, each with defined objectives, processes, and timescales. The three stages provide a proportionate and escalating response, resolving concerns at the earliest appropriate stage wherever possible.

Stage 1 Informal Resolution	
Objective	To resolve concerns quickly and informally wherever possible, maintaining positive relationships and addressing issues before formal escalation. Most concerns can and should be resolved at this stage.
Process	The concern is raised with any member of staff or the Registered Manager. Staff listen carefully with empathy and respect, and attempt to resolve the matter immediately where possible. If not immediately resolvable, the concern is referred to the Registered Manager within the same working day. The concern and resolution are recorded in the home's complaints log. The complainant is informed of the outcome and of how to proceed to Stage 2 if they remain dissatisfied.
Timescale	Acknowledged immediately upon receipt; resolved and outcome communicated within 5 working days.

Stage 2 Formal Complaint — Internal Investigation	
Objective	To conduct a thorough, fair, and impartial formal investigation of complaints that could not be resolved informally, or that are of a serious nature requiring structured and documented inquiry and a formal written response.
Process	The complaint is submitted in writing (or recorded in writing by a staff member if made verbally), and formal written acknowledgement is sent to the complainant within 2 working days. The Registered Manager appoints an appropriate investigator — who must not be directly involved in the matter. The investigation involves: full review of all relevant records; individual interviews with the complainant, witnesses, and staff; and production of a written investigation report with findings and recommendations. A comprehensive written response is provided to the complainant including: a summary of the complaint; the investigation process; findings and conclusions; the outcome; any actions to be taken; and information about Stage 3.
Timescale	Acknowledged in writing within 2 working days; full written response within 20 working days (extendable to 30 in genuinely exceptional circumstances, with the complainant notified promptly).

Stage 3 Review by Responsible Individual or Independent Person	
Objective	To provide a robust, objective, and genuinely independent review of complaints that remain unresolved after Stage 2, or where the complainant is dissatisfied with the outcome or conduct of the internal investigation.
Process	The complainant requests a Stage 3 review in writing within 10 working days of the Stage 2 response, stating reasons for dissatisfaction. Acknowledged within 2 working days. The Responsible Individual or an appointed independent reviewer — with no connection to the home or staff — conducts the review, which involves: full examination of all Stage 2 documentation; a meeting with the complainant where appropriate; and assessment of whether the investigation was thorough, fair, and whether the outcome was proportionate. A written decision is provided including: findings; whether Stage 2 decision is upheld, overturned, or modified; any additional actions; and information about external escalation.
Timescale	Review acknowledged within 2 working days; written decision provided within 20 working days of the written review request.

8. Timescales Summary

Stage	Acknowledgement	Full Response
Stage 1 — Informal Resolution	Immediately	Within 5 working days
Stage 2 — Formal Complaint	Within 2 working days	Within 20 working days (max 30 exceptional)
Stage 3 — RI Review	Within 2 working days	Within 20 working days of review request

All timescales are calculated in working days (Monday to Friday, excluding public and bank holidays). Where timescales cannot be met, the complainant is informed promptly, the reason is explained, and a revised completion date is provided. Any extension is documented in the complaints register.

9. Support for Complainants

9.1 Children and Young People

Every child has an unconditional right to make a complaint without any negative consequence. Support provided to children includes:

- Individually appropriate, age-accessible information about this procedure — discussed in the first keyworker session within 48 hours of arrival.
- The right to access an independent advocate at any stage — facilitated promptly and free of charge for any child who requests it.
- Active support from a trusted staff member of the child's own choosing in making and articulating their complaint.
- Clear, genuine, and repeated reassurance that making a complaint will not affect their care, placement, or any relationship within the home.
- Assistance with completing forms, writing letters, or preparing for conversations where needed.
- Regular, clear, accessible updates on the progress of their complaint throughout the process.
- A child-friendly, honest explanation of the outcome and any actions taken when the complaint is resolved.

9.2 Parents, Families, and Professionals

Parents, family members, social workers, IROs, and placing authority professionals making complaints are provided with: clear written information at the start of the process; the opportunity to meet with the Registered Manager to discuss their concerns at any stage; regular written updates on progress; and explicit information about external bodies for further escalation or independent advice.

9.3 Reasonable Adjustments

This home makes all reasonable adjustments to ensure the procedure is fully accessible: information in large print, easy-read, or audio formats; professional interpretation or translation services; assistance completing forms; additional time and flexibility in all communications; and flexible meeting formats and locations. No complainant should face barriers to exercising their right to complain.

9.4 Independent Advocacy

Every child has the right to an independent advocate throughout the complaints process. This home facilitates access to advocacy services promptly and without delay. Advocacy is free of charge to all children. Information about advocacy services is included in the Children's Guide

provided to every child on arrival. Broomsdale House maintains links with local advocacy providers in the West Yorkshire and Kirklees area.

9.5 Multilingual and Communication Support

Where a complainant's first language is not English, or where a complainant has communication needs affecting their ability to engage with a written or formal process, this home will secure appropriate professional interpretation or translation services at no cost to the complainant. Kirklees is one of the most culturally and linguistically diverse areas in England, and this home's commitment to accessible complaints processes reflects that diversity fully.

10. Record Keeping and Documentation

10.1 Complaints Register

A central complaints register is maintained, recording all complaints — from informal concerns to Stage 3 reviews — including: date and time received; complainant details (with appropriate confidentiality); full details of the complaint; all actions taken; findings and conclusions; outcome and decisions; all written communications; and date of closure.

10.2 Confidentiality and Data Protection

All complaint records are stored securely in full compliance with UK GDPR and the Data Protection Act 2018. Access is restricted to authorised senior management and is available to Ofsted upon inspection. The identity of complainants — particularly children — is protected wherever consistent with conducting a fair investigation.

10.3 Retention of Records

Complaint records are retained in accordance with Schedule 4 of the Children's Homes (England) Regulations 2015 and the home's Data Protection Policy, and destroyed securely at the end of the applicable retention period.

11. Monitoring, Review, and Learning from Complaints

11.1 Monthly Review

The Registered Manager conducts a formal monthly review of all complaints received, examining: number and category; whether complaints cluster around particular staff, times, or aspects of provision; outcomes; timescale compliance; and any actions taken or outstanding. A summary is reported to the Responsible Individual.

11.2 Annual Summary

An annual summary of all complaints received, investigated, and resolved is produced by the Registered Manager, including analysis of trends, themes, recurring issues, and outcomes. It is shared with the Responsible Individual and forms a key component of the Regulation 45 Quality of Care Review.

11.3 Learning and Continuous Improvement

Every complaint is treated as a genuine learning opportunity. Complaint analysis drives real and specific improvements: identifying patterns, implementing policy and practice changes, providing targeted staff training, improving communication with families and placing authorities, and refining the physical environment. All learning from complaints is documented, shared with the staff team, and built into the continuous improvement cycle.

11.4 Review of This Procedure

This procedure is formally reviewed annually and more frequently in response to: changes to legislation or Ofsted guidance; significant complaints or patterns of complaints; Ofsted inspection recommendations; or feedback from children, families, or professionals. All changes are communicated clearly to children, families, and relevant stakeholders.

12. Vexatious or Unreasonable Complaints

This home is committed to dealing with all complaints fairly, respectfully, and impartially. However, in clearly evidenced and exceptional cases, a complaint may be determined vexatious or unreasonable — for example, where a complaint is obsessive, persistently repetitious without genuine new grounds, deliberately disruptive, or threatening in nature. Any such determination must: be made jointly by the Registered Manager and the Responsible Individual; be based on clear, objective, documented evidence; be communicated formally and in writing to the complainant with full explanation; and be reviewed regularly to ensure it remains appropriate. The complainant always retains their absolute right to contact Ofsted directly, and is explicitly informed of this right in writing.

13. External Escalation

Where a complainant remains dissatisfied after completing all three stages of this procedure, or where they feel their concern cannot be addressed through the home's internal process, they have the right to contact the following external organisations:

13.1 Ofsted

Ofsted is the statutory regulatory body for this home. Contact: Piccadilly Gate, Store Street, Manchester, M1 2WD | Tel: 0300 123 1231 | Email: enquiries@ofsted.gov.uk

13.2 Kirklees Metropolitan Borough Council

Kirklees Metropolitan Borough Council, Civic Centre 3, Market Street, Huddersfield, HD1 2YZ | Tel: 01484 221000

13.3 Children's Commissioner for England

Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT | Tel: 020 7783 8330 | info.request@childrenscommissioner.gov.uk

13.4 Childline

Tel: 0800 1111 (free of charge, 24 hours a day, 7 days a week) | www.childline.org.uk. The Childline number is provided to every child in their Children's Guide on arrival at this home.

14. Staff Training and Awareness

All staff complete comprehensive training on this complaints procedure at induction — before commencing any independent shift. Training is refreshed annually and updated in response to significant complaints, legislative changes, or identified training needs.

Staff training on complaints covers:

- The home's full legal obligations under Regulation 39 of the Children's Homes (England) Regulations 2015.
- The importance of a complaints-positive culture — welcoming and facilitating complaints, not discouraging them.
- How to receive and record informal concerns and formal complaints promptly, empathetically, and professionally.
- How to support children and families in understanding and accessing this procedure in a genuinely accessible way.
- Professional conduct, independence, fairness, and strict confidentiality during complaint investigations.
- The clear distinction between a complaint and a safeguarding concern, and the correct immediate escalation pathway for each.
- How to use learning from complaints to improve the quality of care at this home.
- Equality, accessibility, and reasonable adjustments in the complaints process.

15. Our Commitment

The management and staff of this home make the following commitments to all children, families, and stakeholders:

- We will create and maintain a genuine, active, complaints-positive culture where all concerns are warmly welcomed as opportunities to listen, learn, and improve.
- We will treat every complainant with complete respect, dignity, fairness, empathy, and genuine concern throughout the complaints process.
- We will respond to all complaints promptly, professionally, and constructively, within the timescales stated in this procedure.
- We will use every complaint as a genuine opportunity for learning and service improvement.
- We will protect all complainants, without exception, from any form of victimisation, discrimination, or negative treatment as a consequence of making a complaint.
- We will ensure every child always feels completely safe, empowered, and supported to speak up — and that their voice is genuinely heard, taken seriously, recorded, and acted upon.
- We will maintain the highest possible standards of residential childcare and safeguarding for every child in our care at all times.
- We will review this procedure annually, implement learning from complaints, and communicate all improvements transparently to children and stakeholders.

16. Contact Information

Home	Broomsdale House
Home Type	3-Bedded Residential Children's Care Home — EBD (Medium Priority)
Address	23 Broomsdale Road, Batley, WF17 6PF
Registered Manager	[To be confirmed upon Ofsted registration]
Telephone	[To be confirmed upon Ofsted registration]
Email	[To be confirmed upon Ofsted registration]
Responsible Individual	[To be confirmed upon registration]
Ofsted Contact	0300 123 1231 enquiries@ofsted.gov.uk
Childline	0800 1111 (free, 24 hours a day)

16a. Root Cause Analysis and Improvement

16a.1 Root Cause Analysis

Every formal complaint at this home is subject to a systematic root cause analysis — looking beyond the immediate surface issue to identify the underlying systemic, procedural, staffing, or environmental factors that contributed to the complaint arising. This is not simply an administrative process: it is a genuine commitment to understanding what we can do better.

- What specific policy, practice, interaction, or environment led to this complaint?
- Was this an isolated incident or is there a pattern that needs to be addressed?
- What can be changed — in training, in policy, in daily practice, in the physical environment — to prevent recurrence?
- Has the change been implemented and evaluated for effectiveness?

16a.2 The Culture This Procedure Reflects

The complaints procedure at this home exists not in isolation — it reflects the broader culture of openness, honesty, and genuine respect for the children in our care. We aspire to create an environment in which complaints are rarely needed because children feel heard, valued, and cared for in their everyday experience. When complaints do arise, they are received as genuinely welcome feedback — not as a threat or an inconvenience.

We specifically commit to: ensuring every child who makes a complaint receives a genuine, honest, understandable explanation of what happened and what has changed as a result; ensuring no child ever feels that complaining was a mistake, a waste of time, or something they regret; and recognising and thanking children who show the courage to speak up.

16a.3 A Rights-Based Approach

The complaints procedure at this home is grounded in a clear recognition that children have rights — not as beneficiaries of our goodwill, but as rights-holders with inherent dignity and the legal right to be heard. We do not receive complaints from children as a favour — we receive them as an obligation, because children have the right to raise concerns about their care and the right to have those concerns taken seriously.

16b. Ofsted and This Procedure

Regulation 39 of the Children's Homes (England) Regulations 2015 places a clear legal duty on the registered person to ensure a suitable complaints procedure is established and operated effectively at all times. Ofsted assesses compliance with this Regulation and the relevant Quality Standard at every inspection. The quality and accessibility of a home's complaints culture is treated by Ofsted as a direct indicator of the quality and openness of its care.

This home takes its obligations under Regulation 39 seriously — not as a compliance requirement to be minimally satisfied, but as a genuine and actively maintained commitment to the children in its care. The management and staff are proud of this procedure and proud of the culture it reflects.

16b.1 Annual Report

Each year, this home produces a brief annual summary of complaints received, outcomes achieved, and improvements implemented. This summary is shared with Kirklees Metropolitan Borough Council's commissioning team, all active placing local authorities, the Responsible Individual, and Ofsted upon inspection. It demonstrates the home's commitment to transparency and to using complaints as a genuine driver of service improvement.

16b.2 A Final Word

The management and staff of this home are proud of their complaints procedure and proud of the culture it reflects — a culture of openness, honesty, learning, and genuine respect for every child's right to be heard. We invite all children, families, and placing professionals to share any concern with us — and to hold us to the commitments we have made in this document. Our word is not just written here: it is demonstrated in our actions, every single day.

16c. Children's Rights and the United Nations Convention

This home's approach to complaints is grounded in the United Nations Convention on the Rights of the Child (UNCRC), which the United Kingdom has ratified. Article 12 of the UNCRC gives every child the right to express their views freely on matters affecting them, and to have those views taken seriously. Article 13 gives children the right to seek, receive, and share information. Article 17 gives children the right to access information from a variety of sources.

This home takes these rights seriously in practice — not merely in aspiration. Every aspect of this complaints procedure is designed to give real, practical effect to each child's rights under the UNCRC: to be heard, to be informed, and to have their concerns acted upon.

Specifically, this home commits to:

- Ensuring every child understands their rights under this procedure — in language and formats accessible to them.
- Never allowing a child's age, communication ability, or disability to be a barrier to exercising their right to complain.
- Facilitating independent advocacy to ensure every child can exercise their rights regardless of confidence, communication skills, or past experience.
- Reporting annually on how children's complaints have led to genuine change — demonstrating through evidence that their voices make a difference.

16d. Continuous Improvement Through Complaints

The formal review of complaints at Regulation 45 Quality of Care Reviews ensures that every six months, the Responsible Individual and Registered Manager examine the totality of the home's complaints performance. This review asks: Have we learned from every complaint? Have we implemented the changes we promised? Have those changes made a genuine difference? The answers to these questions drive the home's next six-month improvement priorities.

- Every change made as a result of a complaint is documented and its impact evaluated.
- Children are informed of improvements made as a direct result of their feedback.
- The complaints register is shared with Ofsted at inspection as evidence of quality assurance.

The Registered Manager reviews and signs off this complaints procedure as part of their annual quality review. The procedure is presented to every new member of staff at induction and is reviewed collectively by the staff team annually. It is not a document that sits on a shelf — it is a living commitment, actively practised every day.

Completed by	Date	Signature
Registered Manager	August 2026	

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