



# Frank 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 Frank House.**

**38 Frank Lane**  
Dewsbury  
WF12 0JN

Date: September 2026  
Prepared by: C2 Homes Planning Consultancy

### Contents

1. Introduction
2. Legal Framework
3. Purpose and Scope
4. Who Can Make a Complaint
5. Types of Complaints

6. How to Make a Complaint
7. Complaint Procedure — Stages
8. Timescales Summary
9. Support for Complainants
10. Record Keeping
11. Monitoring, Review and Learning
12. Vexatious Complaints
13. External Escalation
14. Staff Training
15. Our Commitment
16. Contact Information

## 1. Introduction

---

This Complaint Procedure ensures that concerns and complaints about Frank House, 38 Frank Lane, Dewsbury, WF12 0JN, 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, and continuous improvement through every concern raised.

We welcome complaints as a genuinely valued source of learning. No child at Frank House will ever experience any negative consequence for raising a concern or making a complaint. In a 3-bedded home, the intimacy of the setting means the staff team has an exceptionally close knowledge of all three children — concerns are often noticed and addressed proactively, but the formal route is always available and always safe.

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, 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 a suitable complaints procedure is established and operated effectively at all times.

All information about this procedure is available in accessible formats — including easy-read, large print, audio, and translation — upon request.

## 2. Legal Framework

---

This procedure complies fully with:

- The Children's Homes (England) Regulations 2015 — Regulation 39 (Complaints and Representations)
- The Children Act 1989 and the Children Act 2004
- The Guide to the Children's Homes Regulations including the Quality Standards (Ofsted)
- UK General Data Protection Regulation and the Data Protection Act 2018
- Working Together to Safeguard Children (2023)
- Human Rights Act 1998 | Equality Act 2010

## 3. Purpose and Scope

---

### 3.1 Purpose

The purposes of this Complaint Procedure are to: provide a clear, accessible, fair, and transparent process; ensure all complaints are taken seriously and dealt with promptly; enable children and families to raise concerns freely without fear of victimisation; create a genuine culture of openness and learning; identify areas for improvement; and fulfil all legal obligations.

### 3.2 Scope

This procedure applies to complaints about: quality and safety of care; staff conduct; decisions by the home; policies and their application; physical facilities; and communication with families and placing authorities. Safeguarding concerns take absolute precedence over this procedure.

## 4. Who Can Make a Complaint

---

The following may make a formal complaint:

- Any child residing at or who has previously resided at the home.
- Parents, guardians, or persons with parental responsibility.
- Family members and other persons significant to a child.
- Social workers, IROs, and other involved professionals.
- Independent advocates acting on behalf of a child.
- Placing authority commissioning officers.
- Members of the public with a legitimate interest.
- Staff members — via the Whistleblowing Policy where appropriate.

## 5. Types of Complaints

---

### 5.1 Informal Concerns

Minor issues resolved quickly and informally through direct conversation with staff or the Registered Manager. Recorded in the complaints log. Staff receive all concerns with empathy and professionalism.

### 5.2 Formal Complaints

More serious concerns requiring formal investigation, a written response, and clear communication of outcome. All formal complaints follow the three-stage process in Section 7.

### 5.3 Safeguarding Concerns

Any concern raising questions about a child's safety is treated immediately as a safeguarding matter — reported to the Registered Manager, social worker, LADO where appropriate, Ofsted within 24 hours, and West Yorkshire Police where the threshold is met.

### 5.4 Whistleblowing

Concerns raised by staff about the conduct of the home or safeguarding matters are addressed through the Whistleblowing Policy.

### 5.5 Representations

Positive or constructive observations from children, families, and professionals are recorded and treated as valuable quality improvement information.

## 6. How to Make a Complaint

---

Complaints may be made: in person; in writing; by telephone; via a complaint form; through an independent advocate; or via a third party with the child's consent.

### 6.1 Accessibility

Information about this procedure is displayed throughout Frank House; included in the Children's Guide; discussed with each child in their first keyworker session; shared with parents and placing authorities; and available in large print, easy-read, audio, and translation upon request.

This home makes all reasonable adjustments to ensure full accessibility for all complainants.

## 7. Complaint Procedure — Stages

This procedure operates through three clearly defined stages:

| Stage 1   Informal Resolution |                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Objective</b>              | To resolve concerns quickly and informally, maintaining positive relationships and addressing issues before formal escalation.                                                                                                                                                                                                        |
| <b>Process</b>                | The concern is raised with any staff member or the Registered Manager. Staff listen empathetically and attempt to resolve immediately. If not immediately resolvable, referred to the Registered Manager within the same working day. Recorded in the complaints log. Complainant informed of outcome and how to escalate to Stage 2. |
| <b>Timescale</b>              | Acknowledged immediately; resolved and outcome communicated within 5 working days.                                                                                                                                                                                                                                                    |

| Stage 2   Formal Complaint — Internal Investigation |                                                                                                                                                                                                                                                                                                                                                                                                    |
|-----------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Objective</b>                                    | To conduct a thorough, fair, and impartial formal investigation with a formal written response.                                                                                                                                                                                                                                                                                                    |
| <b>Process</b>                                      | The complaint is submitted in writing and acknowledged within 2 working days. An appropriate investigator — not directly involved — reviews all documentation, interviews the complainant, witnesses, and staff, and produces a written report. A comprehensive written response is sent including: summary; investigation process; findings; outcome; any actions; and information about Stage 3. |
| <b>Timescale</b>                                    | Acknowledged in writing within 2 working days; full written response within 20 working days (max 30 in exceptional cases).                                                                                                                                                                                                                                                                         |

| Stage 3   Review by Responsible Individual |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Objective</b>                           | To provide an objective, independent review of complaints remaining unresolved after Stage 2.                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Process</b>                             | The complainant requests a review in writing within 10 working days of the Stage 2 response. The Responsible Individual or appointed independent reviewer examines all Stage 2 documentation, meets the complainant where appropriate, and assesses whether the investigation was thorough, fair, and the outcome proportionate. A written decision is provided including findings, whether Stage 2 decision is upheld or modified, and information about external escalation. |
| <b>Timescale</b>                           | Acknowledged within 2 working days; written decision within 20 working days of review request.                                                                                                                                                                                                                                                                                                                                                                                 |

## 8. Timescales Summary

---

| Stage              | Acknowledgement       | Full Response                     |
|--------------------|-----------------------|-----------------------------------|
| Stage 1 — Informal | Immediately           | Within 5 working days             |
| Stage 2 — Formal   | Within 2 working days | Within 20 working days (max 30)   |
| Stage 3 — Review   | Within 2 working days | Within 20 working days of request |

All timescales are in working days. Where timescales cannot be met, the complainant is notified promptly with a revised completion date.

## 9. Support for Complainants

---

### 9.1 Children and Young People

Every child has an unconditional right to make a complaint without negative consequence. Support includes: individually appropriate, age-accessible information; access to an independent advocate at any stage, facilitated promptly and free of charge; assistance from a trusted staff member; clear reassurance that complaining will not affect their care; and regular accessible updates.

### 9.2 Parents, Families, and Professionals

Parents, family members, social workers, IROs, and placing authority professionals receive: clear written information at the start; the opportunity to meet the Registered Manager; regular written updates; and information about external bodies.

### 9.3 Reasonable Adjustments

All reasonable adjustments are made: information in accessible formats; professional interpretation or translation services; assistance completing forms; and flexible meeting formats. 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 is actively promoted, facilitated promptly, and free of charge. Frank House has established links with local advocacy providers in the Kirklees and West Yorkshire area.

### 9.5 The 3-Bedded Context

In a 3-bedded home, a complaint by one child may affect the other residents. The staff team manages this with particular sensitivity — ensuring every child's privacy and dignity are respected, that no child feels responsible for another's concerns, and that the therapeutic relationship with each child is maintained throughout any complaints process.

## 10. Record Keeping and Documentation

---

### 10.1 Complaints Register

A central complaints register records all complaints — date; complainant details; full details; all actions; findings; outcome; all communications; and date of closure.

### 10.2 Confidentiality and Data Protection

All complaint records are stored securely in full compliance with UK GDPR. Access is restricted to authorised senior management and Ofsted upon inspection. Complainants' identities — particularly children's — are protected wherever consistent with a fair investigation.

### 10.3 Retention

Records are retained in accordance with Schedule 4 of the Children's Homes (England) Regulations 2015 and the Data Protection Policy.

## 11. Monitoring, Review, and Learning from Complaints

---

### 11.1 Monthly Review

The Registered Manager conducts a formal monthly review of all complaints examining: number and category; outcomes; timescale compliance; and actions taken. A summary is reported to the Responsible Individual.

### 11.2 Annual Summary

An annual summary of all complaints, outcomes, and improvements is produced and forms a key component of the Regulation 45 Quality of Care Review.

### 11.3 Learning and Continuous Improvement

Every complaint is a genuine learning opportunity driving real improvement: identifying patterns; implementing policy changes; providing targeted staff training; and improving communication. All learning is documented, shared with the team, and built into the improvement cycle.

### 11.4 Review of This Procedure

This procedure is formally reviewed annually and more frequently in response to legislative changes, Ofsted recommendations, significant complaints, or feedback.

## 12. Vexatious or Unreasonable Complaints

---

In clearly evidenced and exceptional cases, a complaint may be determined vexatious or unreasonable. Any such determination must be made jointly by the Registered Manager and Responsible Individual; be based on clear, documented evidence; be communicated to the complainant in writing; and be reviewed regularly. The complainant always retains the right to contact Ofsted directly.

## 13. External Escalation

---

### 13.1 Ofsted

Ofsted: Piccadilly Gate, Store Street, Manchester, M1 2WD | Tel: 0300 123 1231 | [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)

### 13.2 Kirklees Council

Kirklees Council, Civic Centre 3, High Street, Huddersfield, HD1 2TG | Tel: 01484 221000

### 13.3 Children's Commissioner for England

Sanctuary Buildings, 20 Great Smith Street, London, SW1P 3BT | Tel: 020 7783 8330

### 13.4 Childline

Tel: 0800 1111 (free, 24 hours a day) | [www.childline.org.uk](http://www.childline.org.uk)

## 14. Staff Training and Awareness

---

All staff complete comprehensive complaints training at induction and annually. Training covers: legal obligations under Regulation 39; complaints-positive culture; receiving and recording complaints empathetically; supporting children and families; professional conduct during investigations; distinguishing complaints from safeguarding; and using complaints to improve care.

## 15. Our Commitment

---

- We will create and maintain a genuine, active, complaints-positive culture.
- We will treat every complainant with complete respect, dignity, fairness, and empathy.
- We will respond to all complaints within stated timescales.
- We will use every complaint as a genuine learning opportunity.
- We will protect all complainants from any form of victimisation.
- We will ensure every child feels empowered to speak up and that their voice makes a difference.
- We will maintain the highest possible standards of residential childcare at all times.

## 16. Contact Information

---

|                           |                                                                                      |
|---------------------------|--------------------------------------------------------------------------------------|
| <b>Home</b>               | Frank House                                                                          |
| <b>Home Type</b>          | 3-Bedded Residential Children's Care Home — EBD (Medium Priority)                    |
| <b>Address</b>            | 38 Frank Lane, Dewsbury, WF12 0JN                                                    |
| <b>Registered Manager</b> | [To be confirmed upon Ofsted registration]                                           |
| <b>Telephone</b>          | [To be confirmed upon Ofsted registration]                                           |
| <b>Ofsted Contact</b>     | 0300 123 1231   <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a> |
| <b>Childline</b>          | 0800 1111 (free, 24 hours a day)                                                     |

## 16c. Children's Rights and Regulatory Accountability

---

In a 3-bedded home, it is important to recognise that this procedure applies equally and fully to all three children. All three children have identical rights — the right to raise concerns, to be heard, to an independent advocate, and to have concerns investigated and responded to properly. The home's commitment is to ensure all three children always feel genuinely safe to speak up.

### 16c.1 Confidentiality Between Residents

Where one child makes a complaint, the other children are not informed of the details without the complainant's explicit consent. The home manages the process with complete discretion — maintaining the confidentiality of all three children throughout.

### 16c.2 Supporting All Children During a Complaints Process

Where a complaint is being investigated, the Registered Manager ensures all three children receive appropriate therapeutic support throughout. Regular keyworker sessions are maintained for all three children. No child is questioned about the other's complaint without consent. The therapeutic relationship between staff and all three children is actively maintained throughout.

### 16c.3 Regulation 44 — Independent External Route

The monthly Regulation 44 independent visitor provides an additional, external, unmediated opportunity for all three children to raise any concerns or complaints entirely independently of the home's internal procedure. Every child is specifically informed of this in the Children's Guide and first keyworker session.

## 16d. Ofsted, Regulation 39, 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 at every inspection.

### 16d.1 Annual Complaints Report

Each year, this home produces a brief annual summary of complaints received, outcomes achieved, and improvements implemented. This is shared with Kirklees Council's commissioning team, all active placing local authorities, the Responsible Individual, and Ofsted upon inspection.

- 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 culture is reviewed as part of every Regulation 45 Quality of Care Review.

### 16d.2 The UNCRC and Children's Rights

This home's approach to complaints is grounded in the United Nations Convention on the Rights of the Child (UNCRC). Article 12 gives every child the right to express their views freely on matters affecting them. This is a legal obligation and a genuine commitment — not an aspiration.

- Every child understands their rights under this procedure in language accessible to them.
- Age, communication ability, or disability are never a barrier to exercising the right to complain.
- Independent advocacy is provided promptly and free of charge to every child who requests it.

The management and staff of Frank House are proud of this 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.

| Completed by       | Date           | Signature |
|--------------------|----------------|-----------|
| Registered Manager | September 2026 |           |

--- End of Document ---

## 16a. The 3-Bedded Home and Complaints Culture

---

The 3-bedded setting at Frank House creates an exceptionally intimate therapeutic environment. This has particular implications for the complaints culture and practice of this home.

### 16a.1 Proactive Complaint Prevention

In a 3-bedded home, staff develop an extraordinarily close knowledge of all three children. This intimacy means that signs of unhappiness, distress, or dissatisfaction — however subtle — are almost always noticed by staff before they escalate into a formal complaint. The daily keyworker sessions, the constant one-to-one contact, and the close therapeutic relationship mean that concerns are regularly identified and addressed proactively.

This home aspires to a culture in which formal complaints are rarely needed because all three children feel deeply heard, consistently valued, and genuinely cared for in their everyday experience. When formal complaints do arise, they are received as important feedback — not as failures.

### 16a.2 Managing Complaints in a 3-Bedded Setting

Any formal complaint in a 3-bedded home requires particular sensitivity in management. Where one child makes a formal complaint, the following principles apply:

- The other children's privacy and dignity are protected throughout — they are not informed of the details of the complaint without the complainant's consent.
- No child is made to feel responsible for the other's concerns, unhappiness, or formal complaint.
- The therapeutic relationship between staff and all three children is actively maintained throughout any complaints process — the process should not be experienced by any child as disruptive to the care environment.
- Where a complaint involves the conduct of a specific staff member, the home's staffing rota is reviewed to manage any potential impact on all three children's therapeutic relationships.

### 16a.3 Children's Advocacy in a 3-Bedded Home

In a 3-bedded home, the right to independent advocacy is of particular importance. With only three children, the home is a very small community — and all three children need to feel genuinely safe to raise concerns without any sense that this will affect their relationship with the other residents or with staff. Independent advocacy provides exactly this assurance.

This home actively facilitates access to independent advocates for all three children at any stage of any complaints process. Advocacy is free, confidential, and arranged without delay.

## 16b. Annual Complaints Report

---

Each year, this home produces a brief annual summary of complaints received, outcomes achieved, and improvements implemented. This summary is shared with Kirklees Council's commissioning team, all active placing local authorities, the Responsible Individual, and Ofsted upon inspection.

The annual report demonstrates: the number and category of complaints received; the outcomes; the timescale compliance; and the specific improvements made as a direct result of complaints. It demonstrates this home's commitment to transparency and to using complaints as a genuine and meaningful driver of service improvement.

### 16b.1 Continuous Improvement Cycle

Every complaint, concern, and representation received at this home — however informal — is treated as valuable feedback. The Registered Manager maintains a rolling improvement log tracking all concerns raised, actions taken, and outcomes evaluated. This log is reviewed monthly, reported to the Responsible Individual, and forms a key input to the Regulation 45 Quality of Care Review.

Children are informed of improvements made as a direct result of their feedback — demonstrating in practice that their voices have real impact and genuinely matter.

### 16b.2 The UNCRC and Children's Rights

This home's approach to complaints is grounded in the United Nations Convention on the Rights of the Child (UNCRC). Article 12 gives every child the right to express their views freely on matters affecting them, and to have those views taken seriously. This is not aspirational — it is a legal obligation and a genuine commitment.

- Every child understands their rights under this procedure in language accessible to them.
- Age, communication ability, or disability are never permitted to be a barrier to exercising the right to complain.
- Independent advocacy is provided promptly and free of charge to ensure every child can exercise their rights.
- Annual reporting demonstrates through evidence that children's complaints have led to genuine change.

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.

## 16e. Accessibility in a Diverse Community

Kirklees is one of the most culturally diverse districts in West Yorkshire. This complaints procedure is fully accessible to children, families, and professionals from all cultural backgrounds, language communities, and communication needs.

- Professional interpretation and translation services arranged free of charge for any complainant who requires them.
- Information in easy-read, large print, audio, and translated formats available upon request.
- Cultural and religious sensitivity observed throughout all aspects of the complaints process.

### 16e.1 Language Support

Where a complainant's first language is not English, this home arranges professional interpretation or translation services without delay and at no cost. The linguistic diversity of Dewsbury and Kirklees — with significant communities speaking Urdu, Punjabi, Gujarati, Polish, and many other languages — is fully recognised and accommodated.

### 16e.2 Communication Needs

Where a child or family member has a disability, neurodivergence, or communication need, this home makes all reasonable adjustments: accessible format information; additional time and flexibility; and supporting the use of communication aids or advocacy support.

## Appendix — Additional Commitments

Frank House formally commits to the following additional quality standards in the operation of this complaints procedure.

### A.1 Response Quality Standards

Every written response to a formal complaint includes: a clear summary of the complaint as understood; the investigation process; findings for each element; outcome and reasoning; any actions planned; and information about escalation. Where a response requires more time than stated, the complainant is notified proactively with a specific revised date.

### A.2 The Right to an Interpreter

Every complainant has the right to communicate in their preferred language. Professional interpretation or translation services are arranged free of charge for any complainant who requires them — regardless of the language needed. No complainant is disadvantaged by language barriers.

- Services available in: Gujarati, Punjabi, Bengali, Urdu, Somali, Romanian, and all other languages.
- British Sign Language interpretation arranged for Deaf complainants.
- Easy-read and pictorial versions of the procedure available upon request.

### A.3 Complaint Confidentiality

The identity of complainants — particularly children — is protected wherever consistent with a fair investigation. Details are not disclosed to any person without a legitimate need to know.

### A.4 Learning from Every Concern

Even concerns not rising to formal complaint level are recorded and used as feedback. The gap between no formal complaint and genuine satisfaction is a quality improvement opportunity. The Registered Manager actively seeks to understand what all three children experience and finds difficult — and acts on that intelligence proactively.

### A.5 Our Final Commitment

The measure of this complaints procedure is not regulatory compliance — it is whether all three children feel genuinely safe and empowered to speak up. That is the standard we hold ourselves to, and the standard by which we ask Ofsted and placing authorities to judge us. We are proud of this procedure and the culture it represents.

## Appendix — Quality Assurance and Learning

Frank House treats every complaint as a quality improvement opportunity. The Registered Manager maintains a complaints log reviewed monthly, and all learning is documented, shared with the staff team, and built into the improvement cycle.

### A.1 Annual Complaints Report

Each year this home produces a brief annual summary of complaints received, outcomes achieved, and improvements implemented. This is shared with Kirklees Council's commissioning team, all active placing authorities, the Responsible Individual, and Ofsted upon inspection.

### A.2 The Children's Voice — Our Highest Standard

The measure of this complaints procedure is not regulatory compliance — it is whether all three children feel genuinely safe and empowered to speak up. That is the standard we hold ourselves to. We are proud of this procedure and the culture it represents.

Children in residential care have the right — not the privilege — to a complaints procedure that is genuinely accessible, genuinely safe, and genuinely effective. Frank House will never treat this procedure as a bureaucratic requirement. It is a fundamental commitment to every child who lives here.

### A.3 Language Support and Accessibility

Professional interpretation and translation services are arranged free of charge for any complainant who requires them. The linguistic diversity of Kirklees is fully recognised: Urdu, Punjabi, Gujarati, Polish, and all other languages are accommodated. Easy-read and pictorial formats are available on request.

No complainant is disadvantaged by language, disability, or communication needs in exercising their fundamental right to complain. The home makes all reasonable adjustments without exception.

Every member of the Frank House staff team receives training in the complaints procedure at induction and annually. Staff understand that receiving a complaint from a child or family is a normal, healthy, and valuable part of providing excellent residential childcare — not a failure, and not a threat.

We are committed to this procedure and to the culture of openness and accountability it represents.

Frank House is proud of its complaints culture and fully committed to the standards set out in this document.