



COMPLAINTS PROCEDURE

Commissioner-Facing Procedure for Local Authorities, Multi-Academy Trusts, Private Companies and Commissioning Schools

Document Reference:	EL-CP-001
Date Adopted:	1 September 2026
Status:	Adopted

1. PURPOSE AND SCOPE

Ember Learning Ltd is committed to delivering high-quality online services and to resolving any concerns raised by commissioning Local Authorities, Multi-Academy Trusts, private companies and schools ('Commissioners') promptly, fairly, and transparently.

This Procedure sets out the process for raising and resolving a formal complaint about any aspect of the Services delivered by the Provider under a Service Agreement (EL-SA-001). It applies to complaints raised by Commissioners (Local Authorities, Multi-Academy Trusts, private companies and commissioning schools) and covers complaints relating to:

The quality or delivery of sessions

The conduct of a teacher or mentor during a session

Student or Mentee attendance management or reporting

Communication and administrative matters

Any other aspect of the Provider's performance under the Service Agreement

This Procedure does not apply to complaints that involve a safeguarding concern. Any complaint which discloses, raises, or relates to a safeguarding concern about a Student, Mentee or member of staff shall be managed under the Safeguarding Complaint Track in Section 5 of this Procedure, and shall not progress through the standard complaints stages while a safeguarding investigation is ongoing.

This Procedure is provided to Commissioners at the point of commissioning and is available on request.

PARENTS, CARERS. This Procedure sets out the formal pathway for Commissioners. A parent, carer, student, or mentee who wishes to raise a concern about Ember Learning should do so in the first instance directly with the Designated Safeguarding Lead, who will attempt to resolve the matter informally and promptly. Where a concern raised in this way cannot be resolved informally, the Designated Safeguarding Lead will notify the Commissioner of the concern and the outcome of that attempt, and the Commissioner

may then invoke this Procedure formally on the parent or the carers behalf if they consider it appropriate to do so.

2. GENERAL PRINCIPLES

The Provider shall handle all complaints in accordance with the following principles:

All complaints will be taken seriously and treated with respect

Complainants will be kept informed of progress throughout the process

The identity of a complainant will be treated with appropriate confidentiality, except where disclosure is necessary to investigate or resolve the complaint

The Provider will not act in a way that could be perceived as victimising or disadvantaging any Commissioner or Student as a result of a complaint being raised in good faith

Where a complaint is upheld, the Provider will take appropriate action to remedy the matter and prevent recurrence

A record will be kept of all complaints received, the outcome, and any action taken. The record will be reviewed annually by the Company's Director as part of quality assurance

3. STAGE 1 — INFORMAL RESOLUTION

3.1 Time Limit

Stage 1 applies where a Commissioner wishes to raise a concern or complaint informally before making a formal written complaint. The Provider aims to resolve all Stage 1 concerns within five (5) Working Days of the concern being raised.

3.2 How to Raise a Stage 1 Complaint

The Commissioner's nominated contact should raise the concern by email or telephone to the Provider's primary operational contacts:

Jack Bradley, Ember Learning Ltd. jack@emberlearning.co.uk

Mahesh De Zoysa, Ember Learning Ltd. mahesh@emberlearning.co.uk

The complaint should, wherever possible, include:

A clear description of the concern, including relevant dates, Session references, and the name(s) of Students, Mentees, teachers, or mentors involved (if applicable)

What outcome the Commissioner is seeking

3.3 Stage 1 Response

On receipt of a Stage 1 concern, the Stage 1 contact shall:

Acknowledge receipt of the concern within two (2) Working Days

Make reasonable enquiries into the matter, which may include reviewing Session records, speaking with the relevant teacher or mentor (where appropriate and proportionate), and liaising with relevant staff

Provide a written response to the Commissioner within five (5) Working Days of the concern being raised, setting out the Provider's findings and any action proposed or taken

If the matter cannot be fully resolved within five (5) Working Days, the Stage 1 contact shall notify the Commissioner of this and provide an updated timeframe.

3.4 Stage 1 Outcomes

A Stage 1 concern may be resolved by:

An explanation and apology (where appropriate)

A commitment to take specific remedial action

A replacement session being arranged

An agreed change to delivery arrangements

If the Commissioner is satisfied with the Stage 1 response, the complaint is resolved at this stage and a record is made. If the Commissioner is not satisfied, they may escalate to Stage 2.

4. STAGE 2 — FORMAL WRITTEN COMPLAINT

4.1 When to Escalate to Stage 2

A Stage 2 formal complaint should be submitted where:

The Commissioner is not satisfied with the outcome of Stage 1

The Commissioner wishes to bypass Stage 1 because the matter is sufficiently serious to warrant immediate formal investigation

A Stage 1 concern has not received a response within the timeframe set out in Clause 3.3

Stage 2 complaints must be submitted within 20 Working Days of the Stage 1 response (or, where Stage 1 was not used, within 20 Working Days of the matter arising).

4.2 How to Submit a Stage 2 Complaint

The Commissioner's nominated contact should submit a formal written complaint by email, clearly marked 'FORMAL COMPLAINT', to:

Mahesh De Zoysa, Director, Ember Learning Ltd. mahesh@emberlearning.co.uk

The formal complaint must include:

A full written account of the complaint, including all relevant facts, dates, and documentation

A description of any Stage 1 steps taken and the reason for dissatisfaction with the Stage 1 response (if applicable)

The outcome the Commissioner is seeking

The name and contact details of the Commissioner's nominated contact for the complaint

4.3 Stage 2 Response

On receipt of a Stage 2 formal complaint, the Stage 2 officer shall:

Send a written acknowledgement to the Commissioner within three (3) Working Days of receipt

Conduct a formal investigation into the complaint, which may include: reviewing all relevant documentation (Session records, recordings accessible in accordance with the Session Recording Policy, communications, and reports); interviewing relevant staff, teachers, or mentors; consulting the Company's DSL where safeguarding matters are engaged; and taking any other steps reasonably required to investigate the complaint fairly

Provide a full written response to the Commissioner within fifteen (15) Working Days of receipt of the formal complaint, setting out: a summary of the complaint; the investigation steps taken; the Provider's findings; whether the complaint is upheld (in whole or in part) or not upheld; and any action the Provider will take as a result

If the investigation cannot be completed within fifteen (15) Working Days, the Stage 2 officer shall notify the Commissioner with an explanation and revised timeframe. The investigation shall be completed as soon as reasonably practicable.

4.4 Stage 2 Outcomes

Following a Stage 2 investigation, the Provider may:

Uphold the complaint in full and take remedial action

Uphold the complaint in part and set out what aspect is upheld and the action to be taken

Not uphold the complaint, with a full explanation of the reasons

The Stage 2 response shall be the Provider's final formal response under this Procedure.

5. STAGE 3 — ESCALATION PATHWAY

5.1 If the Commissioner remains dissatisfied following the Stage 2 response, the Provider's response shall be considered final under this Procedure.

5.2 In the event of an unresolved dispute, the Commissioner may seek to invoke the dispute resolution process set out in the Service Agreement (Clause 15.2 of EL-SA-001).

5.3 The Provider is not registered as an independent school and is not subject to the statutory schools complaints procedure. However, the Provider is committed to operating its complaints process in a manner consistent with the principles of good administrative practice.

Commissioners who remain dissatisfied following Stage 2 may refer data protection complaints to the Information Commissioner's Office (ICO) at ico.org.uk. Unresolved safeguarding concerns may be escalated to the relevant Local Authority Designated Officer (LADO), adult social care (where the individual is aged 18 or over), Ofsted, or the Department for Education as appropriate.

6. SAFEGUARDING COMPLAINT TRACK

6.1 **IMPORTANT:** If a complaint discloses, raises, or relates to a safeguarding concern — including but not limited to any concern about the welfare of a Student or Mentee, inappropriate conduct by a teacher or mentor toward a Student or Mentee, or a potential child protection or adult safeguarding issue — the complaint shall be managed under this Section 6 and shall NOT progress through the standard Stage 1 and Stage 2 process.

6.2 HOW TO RAISE A SAFEGUARDING COMPLAINT. A complaint involving a safeguarding concern should be raised immediately by contacting the Company's Designated Safeguarding Lead:

Designated Safeguarding Lead:	Jack Bradley
Deputy DSL (if DSL unavailable):	Mahesh De Zoysa
Contact:	Jack Bradley, Designated Safeguarding Lead. jack@emberlearning.co.uk

6.3 On receipt of a safeguarding complaint, the DSL shall:

Treat the matter as an urgent safeguarding concern and manage it in accordance with the Company's Child Protection and Safeguarding Policy

Assess whether a referral to children's social care, adult social care (where the individual is aged 18 or over under the Care Act 2014), the police, or the LADO is required, and make any such referral without delay

Notify the Commissioner's designated safeguarding contact as soon as practicable

Keep a written record of all steps taken and decisions made

6.4 The standard complaints process will not be used to investigate a safeguarding concern while a safeguarding investigation is ongoing. Once any safeguarding investigation is concluded by the relevant statutory authority (or by the Provider, if the matter does not reach statutory authority), the Commissioner may then raise a formal complaint about the Provider's handling of the matter through Stage 2 of this Procedure if they wish.

6.5 ALLEGATIONS AGAINST STAFF. If a complaint involves an allegation against a teacher, mentor, or member of the Provider's staff, the DSL will follow the Provider's LADO referral procedure. Where the individual subject to the allegation works with adults aged 18 or over, the adult safeguarding referral route under the Care Act 2014 applies alongside or instead of the LADO procedure as appropriate. This is a separate process from the complaints procedure and takes priority over it.

7. NAMED CONTACTS SUMMARY

8. RECORD KEEPING

Role	Name	Contact Details
Stage 1 Complaints Contact	Jack Bradley	jack@emberlearning.co.uk
Stage 2 Complaints Officer (Company Director)	Mahesh De Zoysa	mahesh@emberlearning.co.uk
Designated Safeguarding Lead (safeguarding complaints only)	Jack Bradley	jack@emberlearning.co.uk

8.1 The Provider shall maintain a log of all complaints received under this Procedure, including: the date received; the nature of the complaint; the stage at which it was resolved; the outcome; and any remedial action taken.

8.2 The complaints log shall be reviewed annually by the Company's Director and the DSL as part of the Company's quality assurance process. The log shall inform any necessary changes to policy, procedures, or training.

8.3 Complaints records shall be retained for a minimum of:

Three years from the date of resolution.

9. REVIEW

This Procedure will be reviewed annually and following any significant complaint, change in legislation, or DfE guidance update. The procedure owner is the Company's Director. Any material revision will be communicated to Commissioners.

Policy Owner:	Jack Bradley, Director & Designated Safeguarding Lead
Date Adopted:	1 September 2026
Next Review Due:	1 September 2027 (or earlier if a trigger event occurs)
Approved by:	Jack Bradley, Director, 1 September 2026