

Complaints Policy

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Operated by: Nudge Education Ltd · **Version:** Sept 2026 v2.0, review Sept 2027 (NEO addendum v09.26) · **Owner:** Service Director · Approved by the Executive Team on 23 September 2026; Service Director sign-off date to be confirmed

Scope

Nudge Education delivers bespoke interventions to support young people academically, socially and emotionally, helping them progress toward their next steps; whether that is reintegration into school, transition to a new provision, or entering the world of work. We strive to meet the highest standards in all aspects of our work and to provide an exceptional level of service through our trained professionals and resources.

We recognise that concerns may arise about the services we provide. We welcome feedback and complaints as an opportunity to listen, resolve concerns and improve our services.

This policy explains how complaints from external parties will be managed fairly, consistently and as promptly as reasonably practicable.

This policy applies to complaints about services provided by Nudge Education from:

- young people;
- parents and carers;
- commissioning bodies;
- schools and referring organisations;
- professionals involved with a young person; and
- other relevant external stakeholders.

Where a complaint relates to a decision or service provided by a commissioning body rather than Nudge Education, the complainant may be directed to the relevant commissioning body.

Where a contract or commissioning arrangement specifies a particular complaints process, that process will be followed where applicable.

Matters managed under other procedures

Safeguarding and child protection

Any concern relating to the safety or welfare of a child or young person will be dealt with under Nudge Education's **Safeguarding and Child Protection** procedures.

Where appropriate, concerns may also be referred to the relevant Local Authority or other statutory agency.

Whistleblowing

Concerns about serious wrongdoing, malpractice or other matters covered by whistleblowing arrangements should be raised under the **Whistleblowing Policy**.

Employment matters

Concerns raised by Nudge Education employees about their employment should be dealt with under the **Grievance Policy** or another relevant HR procedure.

Data protection

Complaints specifically concerning data protection or the handling of personal information will be managed under Nudge Education's **data protection procedures** and, where appropriate, may be referred to the Information Commissioner's Office (ICO).

How to make a complaint

Complaints can be made by email or post.

Email: talktonudge@nudgeeducation.co.uk

Post: FAO: Complaints, Nudge Education, 2 Sirius House, Amethyst Road, Newcastle upon Tyne, NE4 7YL

Formal complaint

A formal complaint should provide, where possible:

- details of the concern;
- what happened and relevant dates;
- who was involved, if known;
- any relevant information or evidence; and
- the outcome the complainant is seeking, if applicable.

We will acknowledge the complaint has been received.

Complaint investigation

A suitable person will be appointed to investigate the complaint. The complaint will be handled fairly and impartially, and, wherever reasonably practicable, the person investigating will not have been directly involved in the circumstances giving rise to the complaint. Where this is not reasonably practicable due to the nature or size of the organisation, appropriate steps will be taken to ensure the complaint is considered objectively and without bias.

We will not respond to any complaints in a public forum such as social media platforms.

We will respond in writing or by email and may call or arrange a meeting to gather further clarifications if required.

We will always make a written log of formal complaints for our own quality assurance and compliance purposes. These will be stored on a secure system.

As part of the investigation, we may need to speak with the complainant directly. If the complainant is a young person, we would always ask that they be accompanied by an appropriate independent advocate, family member or carer who is able to support them through the process. Where appropriate support is not immediately available, we will consider how best to enable the young person to participate safely and meaningfully in the process. This may include delaying the investigation until appropriate support can be arranged.

Local independent advocacy services can be found online or by speaking with your local authority social services commissioning team.

We will consider older complaints on a case by case basis. We may be unable to investigate a complaint where the passage of time means that relevant information or evidence is no longer available.

We will gather any relevant information by speaking with relevant staff or other individuals, reviewing relevant records and documentation, and considering any other relevant information or evidence.

We will normally provide a written outcome within 15 working days of receiving the formal complaint.

Where this is not reasonably practicable, the complainant will be informed of the reason for the delay and given an expected date for the response.

Complaint outcome and actions

Following the investigation, Nudge Education will provide the complainant with a written response explaining the outcome of the complaint.

The response will, where appropriate:

- summarise the concerns raised;
- explain what was considered as part of the investigation;
- provide the outcome and reasons for the decision;
- confirm any actions Nudge Education will take as a result; and
- explain how the complainant can request a review if they remain dissatisfied.

The action taken will depend on the circumstances of the complaint and may include clarification, an apology, changes to the service or intervention, additional support, staff guidance or other appropriate action.

Where a complaint identifies wider learning or improvement opportunities, these will be considered through Nudge Education's quality assurance processes.

Nudge Education may be unable to provide details of confidential employment, disciplinary, safeguarding or other action taken in relation to another individual;

this is protected under data protection law.

Review of a complaint outcome

If a complainant remains dissatisfied following the formal complaint outcome, they may request one review.

A review should normally be requested within 10 working days of receiving the complaint outcome and should explain why the complainant believes the outcome should be reviewed.

A review may be appropriate where:

- relevant information was not considered;
- the complaints procedure was not followed appropriately; or
- the outcome does not appear reasonable based on the evidence available.

The review will normally be undertaken by a suitably senior person who was not involved in the original investigation.

The review will consider whether the original complaint was investigated and determined appropriately. It will not normally involve a complete reinvestigation unless there is a clear reason to do so.

A written final response will normally be provided within 15 working days of receiving the review request. Where additional time is required, the complainant will be informed.

The outcome of the review is the final response from Nudge Education under this complaints procedure.

Unreasonable or persistent complaints

Nudge Education will seek to deal fairly with all complaints. However, we may take reasonable steps to manage complaints that are abusive, threatening, discriminatory, excessively repetitive or otherwise unreasonable.

This may include:

- limiting communication to a named contact;

- requiring communication to be in writing;
- limiting the frequency or method of contact; or
- explaining that no further response will be provided where the complaint has already been fully considered.

Any decision to restrict communication will be proportionate and will take account of the circumstances of the individual complaint.

External escalation

Once Nudge Education's internal complaints process has concluded, the complainant may have the option of raising their concerns with another organisation, depending on the nature of the complaint.

This may include:

- the relevant commissioning body, such as a Local Authority, Virtual School or referring school;
- the relevant Local Authority or statutory safeguarding agency where a safeguarding concern exists;
- the Information Commissioner's Office where the complaint concerns data protection; or
- another relevant regulatory or statutory body, where applicable.

Where appropriate, Nudge Education will cooperate with any external investigation or request for information.

Complaints involving children and young people

Young people will be supported to raise concerns in a way that is accessible and appropriate to them, including through opportunities throughout their intervention to share their views directly with Nudge Education staff.

When a young person makes a complaint, we will consider their age, understanding and individual circumstances when deciding how the complaint should be managed.

A young person does not need to make a complaint through a parent or carer where it is appropriate for them to raise the concern themselves.

Reasonable adjustments and appropriate support will be considered where required.

Recording and learning

Formal complaints will be recorded securely on the Nudge Education complaints log.

Access to complaint records will be limited to those who need the information to manage the complaint or for appropriate quality assurance purposes.

Complaint information will be reviewed to identify themes, risks and opportunities for improvement.

Where appropriate, actions arising from complaints will be monitored to ensure that agreed improvements are implemented.

Accessibility

This policy is available to young people, parents, carers, commissioners, schools and other relevant external stakeholders.

Nudge Education will consider reasonable adjustments to the complaints process where required to enable individuals to raise and participate in a complaint.

Policy approval

Version	Date	Summary of changes	Approved by
1.0	Dec 2025	Original policy	Director of Partnerships & Services
2.0	Sept 2026	Reviewed and updated to reflect current organisational structures and provide greater	Service Director (Executive Team approval 23

Version	Date	Summary of changes	Approved by
		clarity across the complaints and review process.	September 2026)

This policy has been approved by the Nudge Education Directorate.

NEO Online Addendum

*This addendum applies the Nudge Education Complaints Policy above to Nudge Education Online (NEO). NEO follows the same structure and timescales: a formal complaint outcome, followed by one review. It adds only what the online setting needs, and one safeguard: at NEO the review is carried out by a panel that includes a member independent of NEO's management, in line with the complaints standard for accredited online education providers. The summary for families is in the **NEO Appeals and Complaints Policy**.*

Policy Owner	Director, Nudge Education Online & Head of School
Approved	September 2026
Review Date	September 2027, or sooner if the Nudge Education Complaints Policy changes
Version	09.26 (replaces 04.26)
Operating Company	Nudge Education Ltd (Company Number 10192753)
Accreditation Route	Online Education Accreditation Scheme (OEAS) — accreditation in progress

NEO is a fully online alternative provision for learners aged 11–18, operated by Nudge Education Ltd. NEO is not a DfE-registered independent school and is not subject to Independent Schools Inspectorate (ISI) inspection. NEO is pursuing OEAS accreditation only.

1. How the Nudge procedure applies at NEO

Step	At NEO	Timescale
Early resolution	Raise the concern with the learner's Practitioner-Mentor, the relevant member of staff or the Director NEO & Head of School — by email, telephone, at a review meeting or via neo@nudgeeducation.co.uk . Most concerns are resolved here.	Acknowledged within 2 working days
Formal complaint	In writing to talktonudge@nudgeeducation.co.uk or by post (details above). NEO complaints are investigated by someone not directly involved, and decided by the Director NEO & Head of School or a nominated senior colleague.	Acknowledged within 5 working days; written outcome normally within 15 working days
Review	Requested in writing, explaining why the outcome should be reviewed. Carried out by a panel of at least three people not involved in the original investigation, at least one of whom is independent of NEO's management and running. The panel normally meets on Google Meet;	Request within 10 working days of the outcome; written final response normally within

Step	At NEO	Timescale
	the complainant may attend and be accompanied.	15 working days of the request
External escalation	As set out in the Nudge policy above. For NEO this includes the commissioning body for commissioned places, the Local Authority Designated Officer (LADO) for concerns about an adult's conduct towards a young person, and the ICO for data protection.	—

Where a timescale cannot be met, the complainant is told why and given an expected date, as the Nudge policy requires.

2. NEO-specific points

- **Safeguarding first.** A complaint that includes a safeguarding concern goes straight to NEO's Designated Safeguarding Lead under the **Safeguarding Policy**. The complaint is paused where necessary so that safeguarding takes priority.
- **Complaints about senior people.** A complaint about the Director NEO & Head of School is made to the Proprietor. A complaint about the Proprietor is made to the Designated Safeguarding Lead, who decides independently how it is investigated.
- **Learner voice.** Learners may raise a concern themselves, through a trusted adult, their Practitioner-Mentor or NEO's anonymous reporting route, and may be accompanied at any stage.
- **Online access.** Meetings and panel reviews take place on Google Meet unless the complainant asks for another arrangement; reasonable adjustments are made where needed.
- **Personal information.** A complaint about how personal information has been used can be made to privacy@nudgeeducation.co.uk at any time.

In line with the Data (Use and Access) Act 2025 it is acknowledged within 30 days and answered without undue delay.

- **Records.** Formal complaints and reviews are logged in NEO’s complaints register, recording whether each was resolved at the formal stage or went to review, and the action taken. The number of formal complaints in the previous academic year is available to OEAS on request. The Proprietor reviews anonymised complaint themes annually.
- **Examination appeals** follow the **NEO Appeals Procedure**, not this procedure.

3. Related documents

- **NEO — Appeals and Complaints Policy**
- **NEO — Home-School Agreement**
- **NEO — Terms and Conditions for Parents and Carers**
- **Safeguarding Policy** (NEO Online Addendum)

Document Control

Version	09.26
Replaces	04.26 (April 2026)
Approved	September 2026 — Director, NEO & Head of School
Owner	Director, Nudge Education Online & Head of School
Changes	Re-aligned with the Nudge Education Complaints Policy v2.0 (Sept 2026): one formal outcome and one review replace the former two formal stages; timescales now 15 working days for the outcome, 10 to request a review and 15 for the review. NEO keeps an independent member on its review panel.

Document control

Field	Value
Version	Sept 2026 v2.0 (NEO addendum v09.26)
Owner	Service Director
Status	live
Source file	Draft Complaints Policy & Procedure Sept 2026 (Google Doc)