



LINK EDUCATION LTD

P007 – COMPLAINTS & ESCALATION PROCEDURE

VERSION 2.1 | AUGUST 2026 | CONTROLLED DOCUMENT

1 PURPOSE, COMMITMENT AND SCOPE

Link Education Ltd is committed to providing a professional, responsive and fair recruitment service and to dealing with complaints openly, consistently and without unreasonable delay. Complaints and feedback are used to resolve individual concerns, protect safeguarding and employment rights, improve service quality and strengthen operational controls.

Link Education Ltd is a Corporate Member of the Recruitment & Employment Confederation (REC) and conducts its recruitment activities in accordance with the REC Code of Professional Practice and applicable legislation.

This procedure provides one route for complaints and concerns raised by:

- clients, including schools, academies, multi-academy trusts, colleges, nurseries and early-years settings;
- candidates, agency workers, temporary workers and permanent-placement candidates;
- employees, parents, carers, members of the public and other stakeholders; and
- representatives acting with appropriate authority, including trade unions and professional advisers.

It covers complaints relating to:

- recruitment, registration, vetting and compliance;
- candidate or agency-worker conduct;
- service delivery, communication, bookings and customer care;
- payroll, holiday pay, pension administration, deductions and timesheets;
- Agency Workers Regulations 2010 (AWR) rights and written-information requests;
- data protection and handling of personal information;
- contractual, fee or commercial administration;
- safeguarding concerns or allegations, subject to the immediate route in P001; and
- failure to respond, unreasonable delay or dissatisfaction with a previous outcome.

This procedure is not a substitute for the P001 Safeguarding & Child Protection Policy, the Whistleblowing Policy, an internal employee grievance or disciplinary process, or a statutory right to pursue a regulator, tribunal or court. Link Education Ltd will identify the correct route and explain it to the person raising the matter.

2 CUSTOMER SERVICE STANDARDS AND FEEDBACK

Link Education Ltd aims to:

- communicate professionally, courteously and honestly;
- understand the needs of clients, candidates and agency workers;
- respond promptly and keep people informed;
- provide accurate information and avoid promises that cannot be kept;
- supply suitably vetted and appropriately matched workers;
- treat people fairly, respectfully and without discrimination;
- accept responsibility where service has fallen below the expected standard; and
- use feedback, compliments and complaints to improve services.

Feedback may be collected through surveys, telephone reviews, consultant visits, client meetings, online reviews, complaints, compliments and routine service conversations. Feedback does not need to be a formal complaint to be recorded and considered for improvement.

3 COMPLAINT-HANDLING PRINCIPLES

Complaints will be handled in accordance with the following principles:

- accessibility – concerns may be raised by telephone, email, letter or another reasonable method;
- promptness – immediate risks are prioritised and other complaints are progressed without unreasonable delay;
- fairness – relevant people have a reasonable opportunity to provide information and respond;
- proportionality – the process reflects the seriousness, complexity and potential impact;
- independence – wherever practicable, a person not directly involved reviews the complaint;
- confidentiality – information is limited to those who need it for resolution, safeguarding or legal compliance;
- no detriment – nobody will be disadvantaged for raising a genuine concern in good faith; and
- learning – outcomes, trends and corrective actions are recorded and reviewed.

4 TRIAGE: CHOOSING THE CORRECT ROUTE

Matter raised	Immediate route	Governing document/process
Safeguarding concern, allegation, immediate danger or low-level concern	Escalate immediately to the DSL/Deputy DSL; do not begin informal complaint resolution	P001 – Safeguarding & Child Protection Policy
Service, communication, recruitment or conduct complaint with no safeguarding element	Informal or formal complaint route as appropriate	This procedure
AWR written-information request or equal-treatment concern	AWR route and statutory timetable	P004 and section 12 of this procedure
Concern about wrongdoing in the public interest or a compromised management route	Protected disclosure route	P013 – Whistleblowing Policy
Internal employee complaint about their own employment	HR grievance route	Internal grievance procedure
Data rights request or personal-data breach	Refer promptly to the responsible data-protection lead	P005 – Data Protection & Information Security Policy

5 HOW TO RAISE A COMPLAINT

Complaints should be addressed to Paula Lazarus, Chief Operating Officer:

- Email: compliance@link-education.co.uk
- Telephone: 01689 878 565
- Post: Link Education Ltd, 3a Victoria Works, 6 Fairway, Petts Wood, Kent BR5 1EG
- If the complaint concerns Paula Lazarus, it should be addressed to Jamie Gray, Managing Director, at jamie.gray@link-education.co.uk or at the postal address above.
- A complainant is not required to attend a face-to-face meeting. Complaints may be handled entirely in writing, by telephone or by video meeting where preferred. Link Education Ltd will make reasonable adjustments where required.
- This procedure is available on the Link Education Ltd website. A copy may also be requested by telephone, email or post, including in an alternative accessible format.

The person raising the complaint should provide, where possible:

- their name and preferred contact details;
- the person, assignment, school, nursery or service concerned;
- a clear description of what happened and the relevant dates;
- the effect of the matter and any immediate risk;
- supporting documents or information available; and
- the outcome or resolution sought.

A complaint will not be rejected merely because all information is not available or it was raised verbally. Link Education Ltd may ask for clarification and will make reasonable adjustments to support accessibility. Anonymous complaints will be considered where sufficient information is available.

6 INFORMAL RESOLUTION

Where the matter is suitable for informal resolution, the consultant or manager may clarify the concern, correct information, apologise, arrange a call or meeting, resolve an administrative error or agree another practical action. The matter and resolution should be recorded where it is material, recurring or capable of identifying a service improvement.

Informal resolution must not be used where:

- a child or another person may be at risk;
- a safeguarding allegation or low-level concern is raised;
- serious misconduct, discrimination, fraud or criminality may be involved;
- the complainant requests a formal investigation and this is reasonable;
- the issue is repeated or an earlier informal resolution failed; or
- the relevant statutory or regulatory process requires a formal response.

7 FORMAL COMPLAINT STAGE

A complaint will be treated as formal where it cannot reasonably be resolved informally, is serious or complex, concerns a repeated failure, challenges an earlier outcome, or is expressly submitted as a formal complaint.

On receipt, Link Education Ltd will:

1. Record the complaint and date received.
2. Acknowledge receipt and identify the person responsible for handling it.
3. Triage any safeguarding, legal, regulatory, payroll, AWR or data-protection element.
4. Confirm the issues to be considered and obtain further information where needed.
5. Investigate proportionately and impartially.
6. Issue a written outcome or progress update within the applicable timescale.
7. Record any remedy, corrective action, learning and follow-up review.

8 ACKNOWLEDGEMENT, OWNERSHIP AND CONFLICTS

Ordinary complaints will normally be acknowledged within one working day. The acknowledgement will confirm the responsible person, the main issues understood, any immediate action and the expected response date. Where the complaint has been sent to the wrong person, it will be forwarded promptly to an appropriate owner.

A person who is directly implicated should not determine the complaint outcome. Where the complaint concerns the usual manager, it will be escalated to another senior manager or director. Where senior management is implicated or independence cannot reasonably be achieved internally, Link Education Ltd may use its external HR adviser, legal adviser or another suitably independent reviewer.

9 INVESTIGATION

A proportionate investigation may include:

- reviewing the complaint, correspondence, CRM notes, booking records and relevant policies;
- checking payroll, timesheets, rates, holiday, pension, assignment or AWR records;
- obtaining information from the complainant, employee, agency worker, client or other relevant person;
- reviewing safeguarding or compliance records with appropriate access controls;
- checking contractual, statutory or regulatory requirements;
- identifying previous related concerns or patterns; and
- seeking HR, legal, REC, safeguarding or specialist advice where appropriate.

The investigator will distinguish fact, opinion and disputed information. Relevant individuals will be given a fair opportunity to respond, subject to any restriction necessary to protect a child, preserve confidentiality or avoid prejudicing an external investigation.

10 RESPONSE TIMES

Stage or matter	Target	Important qualification
Safeguarding or immediate risk	Immediate action	Handled under P001, not held for the complaints timetable
Ordinary complaint acknowledgement	Within 1 working day	The responsible person and expected response date will be confirmed
Ordinary complaint outcome	Normally within 5 working days	Complex matters may take longer; an update and revised date will be provided
Payroll or financial reconciliation	As soon as reasonably practicable	May require payroll, pension-provider, client or third-party records
AWR written-information request after qualifying period	Within 28 days of receipt	This is the statutory information-response period; see section 12
Review request acknowledgement	Within 2 working days	The review timescale will reflect complexity and independence required

Times are targets except where a statutory period applies. A complaint will not be closed merely because a target cannot be met. The complainant will be told the reason for material delay and given a realistic revised date. Safeguarding, evidence preservation and fair investigation take priority over speed.

11 SAFEGUARDING COMPLAINTS AND ALLEGATIONS

Any complaint containing information that a child may have been harmed, an adult may pose a risk, professional boundaries may have been breached or safeguarding procedures may have failed must be referred immediately to the DSL or Deputy DSL under P001. The recipient must not try to resolve it informally, interview witnesses or approach the person alleged to be responsible.

The safeguarding process will determine whether the matter may meet the harm threshold, is a low-level concern or can appropriately return to the complaints or conduct route. Link Education Ltd may liaise with the client, LADO, police, children's social care, DBS, TRA/EWC or another authority as required.

12 AGENCY WORKERS REGULATIONS COMPLAINTS AND INFORMATION REQUESTS

12.1 DAY-ONE RIGHTS

A concern about access to collective facilities or information about relevant vacancies should normally be raised with the hirer and Link Education Ltd promptly. An agency worker may make a written request to the hirer for information about day-one treatment. The hirer must respond in writing within 28 days of receiving a valid request.

12.2 EQUAL TREATMENT AFTER THE QUALIFYING PERIOD

Once an agency worker has completed the applicable 12-week qualifying period, they may request a written statement from Link Education Ltd where they believe they have not received equal treatment in relation to basic working and employment conditions.

The request should identify the assignment and the aspect of treatment questioned. Link Education Ltd will respond within 28 days and provide, as applicable:

- relevant information about basic working and employment conditions, including pay, working time and holiday;
- the factors considered when determining those conditions;
- relevant comparator information where equal treatment is based on a comparable employee; and
- an explanation of any difference in treatment.

If the agency worker has not received the agency's written statement within 30 days of making the request, the Regulations permit them to request the relevant information from the hirer. AWR requests, calculations, client information, responses and corrective action must be retained on the compliance record.

12.3 AWR INVESTIGATION AND CORRECTION

Link Education Ltd will review the assignment history, qualifying-period calculation, breaks and continuity, role, hirer identity, pay and working conditions, comparator information, holiday and payroll records. Where an error is identified, Link will correct records and pay where appropriate, liaise with the hirer and address any process or training failure.

No agency worker will be subjected to detriment for asserting an AWR right or raising a genuine AWR concern. Nothing in this procedure prevents the worker from obtaining advice from Acas, their trade union or legal adviser, or pursuing a statutory remedy within the applicable time limit.

13 PAYROLL, HOLIDAY AND PENSION COMPLAINTS

Payroll-related complaints will be prioritised because delay may cause financial hardship. Link Education Ltd will check agreed rates, approved hours, timesheets, statutory deductions, holiday pay, pension assessment and contributions, and relevant communications. The worker will be told what records or third-party information are required and when the next update will be provided.

Where an underpayment or administrative error is confirmed, Link Education Ltd will arrange correction as soon as reasonably practicable, explain the calculation and update relevant records. Pension complaints may require liaison with the pension provider or The Pensions Regulator and may therefore require a longer investigation period.

14 OUTCOMES AND REMEDIES

The written outcome will normally:

- summarise the complaint and evidence considered;
- state whether each material element is upheld, partially upheld, not upheld or cannot be determined;
- explain the reasons without disclosing confidential information unlawfully;
- identify any apology, correction, payment, service remedy or other action;
- identify relevant training, procedural or control improvements;
- state any follow-up or monitoring arrangements; and
- explain the internal review route and any appropriate external route.

Possible remedies include correcting information or payment, apologising, changing a point of contact, reviewing an assignment or placement decision, further training, performance or disciplinary action, policy or system changes, a safeguarding referral or another proportionate action.

15 REVIEW AND INTERNAL ESCALATION

A complainant who believes the outcome contains a material factual error, relevant evidence was not considered, the procedure was not followed or the proposed remedy is unreasonable may request a review. The request should normally be made within 10 working days of the outcome and should explain the grounds.

Where practicable, the review will be completed by a manager or director who was not the original decision-maker. A review is not necessarily a complete reinvestigation; it will examine the identified grounds, the fairness of the process and whether the outcome was reasonably supported.

A request for review should be addressed to Jamie Gray, Managing Director, at jamie.gray@link-education.co.uk or at the postal address in section 5.

If Jamie Gray made the original decision or is directly involved in the complaint, another director or a suitably independent reviewer will conduct the review.

16 EXTERNAL ESCALATION

Where appropriate, the final response may signpost the complainant to an external body. The appropriate route depends on the subject and the individual's legal status and may include:

- the Recruitment & Employment Confederation in relation to an alleged breach of the REC Code by a member;
- Acas for workplace advice, early conciliation and employment rights;
- the Fair Work Agency or other current enforcement body for matters within its remit;
- the Information Commissioner's Office for unresolved data-protection concerns;
- The Pensions Regulator or pension scheme complaint route;
- a LADO, children's social care, police, DBS or professional regulator for safeguarding matters; or
- an employment tribunal, court, trade union or legal adviser where applicable.

Internal consideration is encouraged where it can resolve the issue, but it does not suspend or extend a statutory limitation period and is not a precondition to contacting an authority where the person is entitled to do so.

17 CONFIDENTIALITY, DATA PROTECTION AND INFORMATION SHARING

Complaint information will be processed lawfully, securely and only for complaint handling, safeguarding, legal compliance, service improvement or another legitimate purpose. Access will be limited to people with a genuine need to know. Absolute confidentiality cannot be guaranteed where information must be shared to investigate fairly, protect a child or comply with law.

The complainant and those involved must avoid unnecessary disclosure, particularly through social media or group messaging. Link Education Ltd will not disclose confidential employment, safeguarding, health, criminal-record or personal information merely to demonstrate that action has been taken.

18 FAIR TREATMENT AND DELIBERATELY FALSE COMPLAINTS

A person will not be disadvantaged for raising or supporting a genuine complaint in good faith, including where the complaint is not upheld. A complaint that cannot be proven is not automatically false or malicious.

Where there is clear evidence that a person knowingly fabricated information or acted maliciously, Link Education Ltd may consider appropriate action. This provision will never be used to discourage safeguarding reports, protected disclosures or the good-faith assertion of employment rights.

19 RECORDS, CORRECTIVE ACTION AND CONTINUOUS IMPROVEMENT

The complaint record will include, where applicable:

- the complaint, acknowledgement, classification and responsible person;
- evidence reviewed, communications and meetings;
- safeguarding, AWR, payroll, data or regulatory escalations;
- findings, outcome, review and closure date;
- remedies, corrective actions, owners and target dates; and
- themes, recurring issues and lessons for training or process improvement.

Records will be retained in accordance with the Data Protection & Information Security Policy and applicable retention requirements. Management will periodically review complaint volumes, response performance, outcomes, repeated issues, customer feedback and completion of corrective actions.

20 ROLES AND TRAINING

- Consultants are responsible for receiving concerns professionally, recording them accurately and escalating them promptly.
- Managers are responsible for proportionate investigation, communication, fair outcomes and corrective action.
- The DSL and Deputy DSL own safeguarding triage and action under P001.
- Compliance and payroll personnel provide records, statutory responses and specialist investigation within their remit.
- The Chief Operating Officer and Managing Director oversee serious, escalated or systemic complaints and management review.

Staff will receive role-appropriate instruction on complaint handling, safeguarding triage, AWR requests, record keeping, confidentiality, equality and communication.

21 RELATED CONTROLLED DOCUMENTS

Related documents are:

P001 – Safeguarding & Child Protection Policy

P002 – Recruitment, Selection and Vetting Policy

P004 – Agency Workers Regulations Policy

P005 – GDPR, Data Protection & Information Security Policy

P013 – Whistleblowing Policy

P019 – Code of Conduct & Ethics; the internal grievance and disciplinary procedures

F022 – AWR Information Request Form

F025 – Customer Feedback Survey; and the complaints, feedback and corrective-action registers.

22 Document control

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