

GOV-004 Complaints, Serious Incidents and Regulatory Reporting Policy

Policy code	GOV-004	Category	Governance and Public Accountability
Owner	Chief Executive Officer	Approver	Chair of Trustees, on behalf of the Board of Trustees
Approval and live date	Approved 26 August 2026; live from 1 September 2026	Review cycle	Next review by August 2027, and sooner after legal, funder, service, serious incident or material risk change.
Status	Approved	Applies to	Element Society
Due diligence note	Built as part of consolidated policy framework; old standalone policies retired or absorbed.	Document type	Policy

1. Purpose

Provides a transparent route for complaints and ensures serious incidents are escalated to trustees and regulators when required.

2. Scope

Applies to complaints from young people, parents/carers, schools, partners, staff, volunteers, funders, members of the public and regulators. Employment grievances and safeguarding referrals follow their own specialist routes but may overlap.

3. Legal and regulatory framework

Charities Act 2011 and Charity Commission guidance, including trustee duties and internal financial controls

Charity Commission guidance on serious incident reporting

Fundraising Regulator complaints expectations where relevant

4. Policy requirements

4.1 Complaint principles

Complaints will be acknowledged, logged, investigated proportionately and responded to in writing where contact details are available.

Element Society will distinguish dissatisfaction, safeguarding concerns, whistleblowing, HR grievances, data protection complaints and serious incidents so that the correct process is used.

Complaints by or about young people must be handled in a child-centred way with safeguarding oversight where risk is indicated.

4.2 Complaint stages

Stage 1: local resolution by the relevant manager where safe and appropriate.

Stage 2: formal review by a senior manager or CEO not directly involved in the matter.

Stage 3: trustee review where the complaint concerns the CEO, organisational failure, unresolved serious concern or reputational risk.

4.3 Serious incidents

The CEO must notify the Chair promptly of incidents involving significant harm, safeguarding failure, fraud, major financial loss, criminal investigation, serious data breach, major reputational risk or regulatory intervention.

The Board decides, with the CEO and professional advice where needed, whether a Charity Commission serious incident report, ICO report, RIDDOR report, funder notification or commissioner notification is required.

4.4 Learning and closure

Complaints and serious incidents must result in a closing record showing findings, actions, owner, timescale and whether policy/training changes are required.

The Board will review themes at least annually and after any material incident.

5. Assurance evidence for due diligence

Complaint log

Serious incident decisions

Regulator correspondence

Action tracker

Board risk review

6. Breach, escalation and review

Breach may be managed through relevant supervision, disciplinary, safeguarding, contract, regulatory or trustee route.

Review is required on the stated cycle and sooner after legal change, serious incident, audit finding, commissioner requirement or material change.

Named escalation and reporting ownership

Area	Owner / decision route
Complaints log	Chris Hill and Cleo Metcalf
Triage route	Chris Hill and Cleo Metcalf
Charity Commission serious incident decision	Chris Hill, Cleo Metcalf and Board
Funder, commissioner, insurer, ICO, HSE, LADO or police notification decision	Chris Hill, Cleo Metcalf and/or Board
Serious incident report sign-off	Chris Hill, Cleo Metcalf and/or Board
Regulatory reporting log	Mohammed Ahmed

Approval and DocuSign signature record

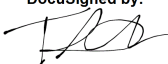
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Live document library	Google Workspace
Superseded policy archive	Archive Workspace

Role	Name	Signature	Date
Chair of Trustees	Ian Balshaw	DocuSign signature	26 August 2026
Chief Executive Officer / Policy Owner	Chris Hill	DocuSign signature	26 August 2026

No further document text changes are required after DocuSign signature unless the Board, Chair, CEO or policy owner identifies an error before issue.

Ian

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