



Introduction

Heart of Supply Ltd is committed to delivering a high-quality, professional and compliant recruitment service. If you are not satisfied with our service, we encourage you to raise your concerns with us. This will help us to improve our standards.

We recognise that concerns or complaints may arise and we treat these as an opportunity to:

- Reflect
- Improve
- Maintain regulatory compliance
- Protect workers, clients and children

This policy applies to:

- Candidates and agency workers
- Client schools and education settings
- Employees
- Third parties

This policy is aligned with:

- Agency Workers Regulations 2010
- Conduct of Employment Agencies and Employment Businesses Regulations 2003
- Employment Rights Act 1996
- Equality Act 2010
- Data Protection Act 2018 & UK GDPR
- REC Code of Professional Practice
- Keeping Children Safe in Education (as amended)

Safeguarding allegations are not managed under this policy and will be dealt with under the Safeguarding Policy. Where safeguarding concerns arise within a complaint, the safeguarding procedure will take precedence.

Nothing in this policy prevents an individual from exercising statutory rights.

Scope of Complaints Covered

This policy covers:

- Service complaints
- Payroll or payment disputes
- Agency Workers Regulations (AWR) complaints
- Day One rights disputes
- 12-week qualifying period disputes
- Equal treatment concerns
- Conduct Regulations compliance issues
- Professional conduct concerns
- Data protection concerns
- Regulatory breaches

All complaints are recorded on the Complaints & Regulatory Concerns Register.



This policy also covers concerns relating to compliance with the Conduct of Employment Agencies and Employment Businesses Regulations 2003, including work-seeker information rights, transfer fee arrangements, and hirer obligations.

Key Principles

We are committed to:

- Accessibility – Clear, simple process
- Promptness – Defined timescales
- Fairness – Objective investigation
- Confidentiality – Information shared only where necessary
- Transparency – Clear communication
- Regulatory compliance – Alignment with statutory obligations

The Company reserves the right to manage persistent, unreasonable, or vexatious complaints proportionately, whilst ensuring that genuine concerns are always investigated fairly.

Awareness of Procedure

Heart of Supply Ltd ensures that clients and work-seekers are made aware of this Complaints Procedure at appropriate stages of the recruitment process.

This policy is available on the Heart of Supply website and can be provided upon request.

Informal Resolution Stage

We aim to resolve concerns at the earliest possible stage. If you have a complaint, please contact your assigned Recruitment Consultant; or the Compliance team by phone 01522 440922 in the first instance so that we can try to resolve your complaint informally.

Upon receiving an informal concern:

- It must be logged in the CRM within 1 working day.
- The concern must be acknowledged within 48 hours.
- Compliance must review regulatory elements where applicable.

Where the issue relates to AWR:

Compliance will:

- Review qualifying period calculations.
- Review assignment continuity.
- Confirm comparator position where required.
- Provide written clarification.

If the concern is resolved, written confirmation will be issued and the case closed.

If the concern cannot be resolved at this stage, or you are not satisfied with the outcome, it will be escalated to a member of the management team for further review.

If the concern remains unresolved, or you are not satisfied with the outcome following escalation, you may proceed to the formal complaint stage.



Formal Complaint Procedure

Formal complaints must be submitted in writing to:

complaints@heartofsupply.co.uk

Complaints should include:

- Full name and contact details
- Assignment details (if applicable)
- Nature of complaint
- Relevant dates and documentation
- Desired outcome

Complaints should be raised within 3 months of the issue. The Company may exercise discretion to investigate complaints raised outside this timeframe where appropriate, particularly where regulatory or safeguarding matters are involved.

Acknowledgement

Upon receipt:

- Complaint logged within 1 working day
- Written acknowledgement issued within 5 working days
- Investigating manager confirmed

Investigation Process

Investigations may include:

- Reviewing assignment records
- Reviewing timesheets and payroll data
- Reviewing 12-week qualifying calculations
- Assessing breaks in service
- Reviewing comparator pay and conditions
- Liaising with client school
- Interviewing relevant parties
- Reviewing communications and documentation

For AWR matters specifically, compliance will:

- Confirm calendar week calculations
- Confirm same role/same hirer test
- Confirm Day One rights compliance
- Assess equal treatment obligations

Timescales

We aim to provide a written response within:

- 20 working days (standard complaints)
- Up to 28 calendar days (complex regulatory/AWR matters)

If additional time is required, written notice will be provided with revised timescales.



Outcome

The written response will include:

- Summary of complaint
- Findings of fact
- Determination
- Remedial action (if applicable)
- Preventative measures

Where a complaint is upheld:

- Back pay or adjustments (if required) will be calculated
- Payroll corrections made promptly
- Schools will be notified where contractual or financial adjustment is required.

Appeal Stage

If dissatisfied, the complainant may submit an appeal within 10 working days.

Appeals will be reviewed by a Director who has not been previously involved in the investigation.

The appeal review will assess:

- Whether procedure was followed correctly
- Whether conclusions were reasonable

A final written decision will be issued within 14 working days.

This decision concludes the internal process.

External Escalation

Depending on the nature of the complaint, individuals may contact:

- Employment Agencies Standards Inspectorate (Conduct Regulations)
- Recruitment & Employment Confederation (REC)
Fourth Floor
20 Queen Elizabeth Street
London
SE1 2LS
- ACAS
- Information Commissioner's Office (data matters)
- Employment Tribunal (subject to statutory time limits)

Record Keeping & Governance

All complaints are recorded in the:

Complaints & Regulatory Concerns Register

Records include:

- Date received
- Category
- Investigation notes



- Outcome
- Remedial actions
- Lessons learned

Records are retained for 6 years.

The register is reviewed annually to:

- Identify trends
- Identify systemic risks
- Improve compliance processes

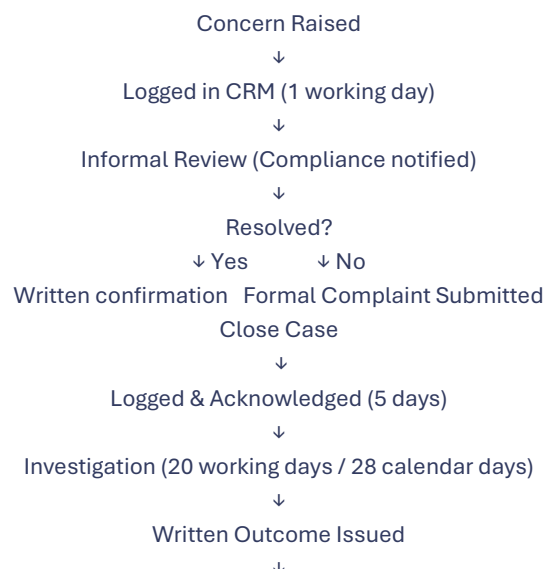
Access to complaint records is restricted to authorised personnel only and managed in accordance with Data Protection legislation.

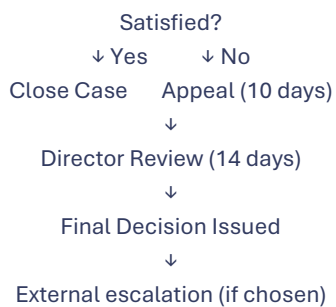
APPENDIX A – INTERNAL AWR INVESTIGATION FRAMEWORK

When a formal AWR complaint is received:

1. Assign case reference.
2. Calculate qualifying period (calendar weeks).
3. Review breaks and resets.
4. Confirm same role/same hirer test.
5. Obtain comparator data from school.
6. Compare:
 - Pay
 - Working time
 - Holiday
 - Rest periods
7. Document findings.
8. Calculate financial exposure if applicable.
9. Implement correction.
10. File investigation summary.

GOVERNANCE FLOWCHART





Where an investigation identifies a regulatory breach, the Company will consider whether a notification to the appropriate regulatory or professional body is required.