

COMPLAINTS POLICY AND PROCEDURE

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Signed by Trust/Committee Chair

Emma Hawker

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Version Control

Version	Date	Author	Summary of Changes
1.1	March 2026	Governance Manager	Previous version approved by Trust Board.
1.2	July 2026	Governance Manager	Policy updated following review against the latest Stone King model policy and DfE best practice guidance. Amendments clarify the scope of the policy, strengthen expectations regarding complaint handling and confidentiality, introduce guidance relating to Artificial Intelligence (AI), clarify arrangements for complaints from non-parents, update record keeping provisions and improve the wording throughout for consistency and readability. No substantive changes have been made to the Trust's complaints process or timescales.

1. Introduction

- 1.1. The aim of this policy is to resolve complaints or concerns about [Name of School] (the "School" in a fair, thorough and transparent way. The School takes complaints seriously and views them as a chance to learn and improve for the future.
- 1.2. 1.2 Any person, including members of the public, may make a complaint about any provision of facilities or services by the School. Different arrangements may apply where complaints are raised by individuals who are not parents/carers of current pupils at the School. Please refer to Part B below.
- 1.3. Please note that complaints about matters where an alternative complaints/appeal process exists will not be generally dealt with under this policy. These are set out below in Part B.
- 1.4. Requests for reasonable adjustments to the process set out below will be considered to ensure that Complainants can access and complete the process.
- 1.5. The complaint procedure set out in this policy does not apply to and is not intended for use by pupils.
- 1.6. Those considering raising a complaint are reminded that the School's core purpose is to educate and safeguard pupils. It has a responsibility, as a publicly funded body, to allocate its resources proportionately and fairly. Complainants are therefore requested to cooperate with this process, and to be mindful of the length and volume of correspondence. This will also assist with ensuring a prompt and effective resolution.
- 1.7. The national charity Parentkind has published Department for Education (DfE) endorsed guides for parents and for schools in relation to resolving complaints on its website¹. All complainants are encouraged to read the Parentkind guidance before raising a complaint under this procedure.

Part A – Complaints procedure

2. Stage 1 – Informal resolution

- 2.1. Any matter of concern or complaint should be raised, and attempted to be resolved, on an informal basis. Generally, it is expected that, where the matter relates to a pupil, it will have been raised with the pupil's form tutor [and head of year] before a request is made to deal with it under the formal stages of this policy.
- 2.2. The concern or complaint should be raised with the School within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. Complaints made outside of this time frame may not be considered unless exceptional circumstances apply.
- 2.3. The School will seek to resolve matters at the informal stage within 15 school days² of the issue being raised.

¹ <https://www.parentkind.org.uk/parent-guide-to-raising-concerns-with-your-childs-school>

² School days in this policy refers to days when the School is open to pupils for teaching, and does not include INSET days.

- 2.4. Where the matter is not resolved at the informal stage, it may be elevated to the formal stage as set out below.

3. Stage 2 – Formal resolution: investigation by a nominated individual

- 3.1. Stage 2 complaints must be set out in writing, using the form available at Appendix 1, within 10 school days of the Stage 1 response and addressed to the Headteacher (unless it relates to the Headteacher, in which case please refer to the section headed 'Complaints against specific role-holders' below). The complaint should set out briefly the grounds of the complaint, stating what it is that the Complainant considers should have been done or where the School has not met reasonable expectations and confirming the outcome sought.
- 3.2. An investigation will be carried out by a nominated individual identified by the Headteacher as appropriate, who will acknowledge the complaint within 5 school days and may offer the Complainant a meeting. The investigator will speak to others involved. Whenever reasonably possible, any meeting with the Complainant will take place within 15 school days of the written complaint being received.
- 3.3. The investigator will put her/his findings in writing and will indicate what, if any, steps should be taken to resolve the matter. Whenever reasonably possible, this will be done within 15 school days of any meeting with the Complainant; if no meeting is arranged it will be within 25 school days of the written complaint being received.
- 3.4. Where the Complainant remains dissatisfied he or she may request the complaint is escalated to Stage 3.

4. Stage 3 – Formal resolution: Complaints Panel Meeting

- 4.1. Stage 3 complaints must be set out in writing, stating where the parent remains dissatisfied and the outcome sought, and lodged with the school office marked for the attention of the [Clerk to the Governing Body] within 10 school days of the Stage 2 response.
- 4.2. The Clerk will acknowledge the Stage 3 complaint within 5 school days and will convene a Complaints Panel.
- 4.3. The Complaints Panel will comprise at least three people from the governing body of the School who have not been directly involved in the matters detailed in the complaint and who have no conflict of interest.
- 4.4. Where the School cannot source three of its governors to form the Complaints Panel it may seek to include, but is not limited to, one or more governors from another school.
- 4.5. The Clerk will invite the School to put in writing its response to the Stage 3 complaint within 15 school days of receiving the request. Whether or not the School has responded, the Clerk will convene a meeting of the Complaints Panel. That meeting will be held on School premises as quickly as practicable given the need to find a date that is reasonably convenient for the Complainant, the School and the members of the Complaints Panel. Whenever possible, the meeting will be held within 15 school days of the end of the School's response time. The meeting date, time and location will be confirmed to all parties at least 10 school days in advance.
- 4.6. The meeting is not a court case, it will be held in private, and will be as informal as circumstances allow. For this reason, electronic recordings of meetings or conversations are not permitted unless a parent's disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before the recording of the meeting takes place. Consent will be recorded in any minutes taken. The parent will have the opportunity to put forward her/his reasons for dissatisfaction and to enlarge on them, but may not introduce

reasons that were not previously put in writing. The Complaints Panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded. The Complainant and the School will have the opportunity to put forward their respective version and views of events and each side, and the Complaints Panel members will be able to ask questions. The Complainant will have the opportunity to make final comments to the Complaints Panel.

4.7. The Complaints Panel may make findings and recommendations and a copy of those findings and recommendations will be:

- (i) sent by electronic mail or otherwise provided in writing to the Complainant and, where relevant, the person complained about; and
- (ii) available for inspection on the School premises by the Governing Body and the [Headteacher].

4.8. The Complaints Panel will formulate its response as quickly as reasonably possible, aiming to do so within 10 school days, and the Clerk will notify all concerned.

4.9. At any meeting, the Complainant will be entitled to bring a companion along to provide support. Legal representation will only be permitted in exceptional circumstances.

4.10. If the Complainant fails to attend the Complaints Panel Meeting on the day without compelling reasons, the Complaints Panel will still proceed in their absence and the process will continue to its conclusion. Any further attempt to re-open the matter will be considered as falling under the "Serial or persistent Complainants" section as set out below.

5. Department for Education

5.1. Once the complaints process is concluded (or a complaint has been terminated due to undue delay or failure to lodge a request for a Stage 3 Complaints Panel Meeting within the time stated in the policy) the matter is closed. If the Complainant is still not satisfied then they may contact the Department for Education (DfE). There is an online procedure at:

<https://www.gov.uk/complain-to-dfe>

5.2. or the Complainant may write to the DfE at:

Ministerial and Public Communication Division
Department for Education
2nd Floor, Piccadilly Gate
Manchester M1 2WD

6. Complaints against specific role-holders

6.1. Complaints against the Headteacher

Any complaint relating to the Headteacher of the school must be raised in the first instance with the CEO who will investigate the complaint as per **Stage 2**.

6.2 Complaints against the Local Governing Body

Where a complaint is brought against a member of the Academy Committee, it should be raised with the Chair of the Academy Committee who will investigate the complaint (or appoint another member of the Local Governing Body to do so) in the same way as in the first stage of the formal process at **Stage 2**.

If the complaint is against the Chair of the Academy Committee, then the Vice Chair of the Academy Committee will investigate the complaint (or appoint another member of the Academy Committee to do so) in the same way as in the first stage of the formal process at **Stage 2**.

In exceptional circumstances the Chair of Trustees may at his or her absolute discretion determine that a complaint against a member of the Academy Committee should be dealt with at Trust Board level and, if so determined, the Chair of Trustees will oversee **Stage 2**.

6.3 Complaints against individual Trustees/the Board of Trustees

If the complaint is against a Trustee, then it should be raised with the Chair of Trustees by writing to the Clerk to the Board of Trustees. In the case of a complaint against either the Chair or the Board of Trustees as a whole, then it should be put in writing to the Clerk to the Board of Trustees who will refer it to the Members.

In such cases, the Chair of Trustees/the Members will investigate the complaint or appoint an appropriate person to do so in the same way as in the first stage of the formal process at **Stage 2**.

Where the complaint moves to **Stage 3**, the Chair of Trustees/the Members (as applicable) will determine how the Complaint Panel is to be constituted but will ensure that at least one person is independent of the management and running of the School.

6.3 Complaints against the CEO or other Trust office staff

If the complaint is against a member of Trust staff, then it should be raised with the CEO (or, in the case of a complaint against the CEO, the Chair of Trustees), who will investigate the complaint (or appoint another member of the Board of Trustees to do so) in the same way as the first stage of the formal process at **Stage 2**.

Part B – Complaints raised by those who are not parents/carers of current pupils

- 7 Complaints made by those who are not parents of current pupils, which includes complaints made by parents of former pupils after they have left the school, will be dealt with as follows:
 - 7.1 Complainants should first attempt to address their complaint to the relevant school or the Trust (as appropriate) informally by raising the matter with a relevant member of school or Trust staff, within **3** months of the incident or, where a series of associated incidents have occurred, within **3** months of the last of these incidents. The school/Trust (depending on the nature of the complaint) will seek to resolve the matter informally within **15** school days.
 - 7.2 If it is not possible to resolve the matter informally, the complaint may be submitted in writing, using the form available at **Appendix 1**, to the CEO, or, where the complaint relates to the CEO, to the Chair of Trustees.
 - 7.3 The complaint will be acknowledged within **5** school days and a final written response will be issued within **15** school days.
 - 7.4 The general provisions set out in Part C below apply.

Part C - General provisions

8. Complaints that will not be considered under this policy

8.1 Usually, complaints relating to the matters set out in the table below will not be considered under this policy as they have their own appeal or complaint processes. Where necessary, the Trust will exercise its discretion.

8.2 Complaints may be raised under this policy about staff conduct, however, any action taken under the Trust's internal disciplinary procedures is confidential and Complainants will not be provided with information about this.

8.3 Where the scope of a complaint is unclear, the School may write to the complainant seeking clarification and/or summarising what the key grounds of complaint are understood to be and/or may request a meeting with the complainant for this purpose.

Matter	Route for raising concern/complaining
Admissions	Admissions Appeal – see Admissions Policy and Statutory Admissions Appeal Code, or complaint to DfE
Exclusions	Statutory review process – see Suspension and Exclusions Policy
Statutory SEN assessments	<u>SEND Tribunal</u> (and see SEN Code of Practice)
Matters likely to require child protection investigation	Raise with Designated Safeguarding Lead or a direct referral can be made to the Multi-Agency Safeguarding Hub (MASH) and/or Local Authority Designated Officer (LADO), Alison Francis, Telephone 01702 534539 - see Child Protection & Safeguarding Policy
Data protection/FOIA	Raise with Data Protection Officer (DPO) at terrydignam@secat.co.uk in the first instance – see Data Protection Policy, [Freedom of Information Policy, Subject Access Request Policy, Privacy Notice for Pupils, Privacy Notice for Parents & Carers. Complaints may also be raised with the Information Commissioner's Office but we ask that you try to resolve these via the DPO first.
Staff Grievances and Disciplinary matters ³	Staff Grievance & Disciplinary Policy
Whistleblowing	Whistleblowing Policy
Third party contractors/suppliers	Third party complaints process

³ Note that, where complaints relate to staff conduct, these may be dealt with under both this Complaints Policy and the Staff Grievance & Disciplinary Policy. In such circumstances Complainants will not be informed of the outcome of any Staff disciplinary investigation or processes.

9 Complaints relating to fulfilment of the Early Years Foundation Stage (“EYFS”) requirements

9.1 In order to comply with the statutory framework, written concerns or complaints relating to the fulfilment of the EYFS requirements will be dealt with in accordance with the following process:

- (i) The written concern/complaint will be acknowledged within **5** school days;
- (ii) The [Headteacher] will investigate the concern or complaint, which may include meeting with the Complainant and the Head of Early Years. A written response notifying the Complainant of the outcome of the investigation will be sent within **28** school days of the complaint being received.
- (iii) Where the Complainant remains dissatisfied, the Clerk will ensure that a formal Complaints Panel will be convened in accordance with **Stage 3** of this policy.

9.2 A record of the written complaints and their outcomes will be maintained and made available to Ofsted on request.

9.3 Parents are further advised that, where they have concerns regarding the School meeting EYFS requirements, they may contact Ofsted on 0300 123 4666.]

10 Complaints received outside of term time

The School will consider complaints made outside of term time to have been received on the first school day after the holiday period.

11 Withdrawal of a complaint

If a Complainant wants to withdraw their complaint, they will be asked to confirm the withdrawal in writing.

12 Record keeping and confidentiality

12.1 A written record will be kept of the progress of the complaint and the final outcome. Complaint records will be maintained securely and in line with the [data protection and retention policy] by the [include job title of the person who will be responsible for complaint records]. Correspondence, statements and records relating to individual complaints will be kept confidential except where a legal obligation to disclose them arises.

12.2 The Complainant should also keep all correspondence, statements and records relating to their complaint confidential, and should not disclose (by way of electronic communication, social media or otherwise) any information or documents relating to their complaint.

13 Anonymous complaints

Where an anonymous complaint is received, the School will use its reasonable endeavours to consider the complaint as best as it reasonably can. However, the School will not be required to consider the complaint pursuant to any specific process and will handle anonymous complaints on a case by case basis.

14 Complaint campaigns

Where the School receives a number of complaints all based on the same subject which, in its reasonable opinion, may be deemed a ‘complaint campaign’, it will deal with the complaints in the following way: individual responses will not be sent to Complainants in such cases. Instead, either a

template response will be sent to all Complainants or a single response will be published on the School's website at the discretion of the [Principal]/Chair of Trustees.

15 Artificial intelligence

- 15.1 In line with the Parentkind parent guide to school complaints, complainants are urged to exercise caution in the use of Artificial Intelligence (AI) in complaint processes as it can introduce an unnecessarily legalistic and contentious approach that is not conducive to resolving the issue in a human way. AI can also introduce inaccurate information, including misstating law, and make a complaint more complex than necessary.
- 15.2 Complainants are reminded that publicly available AI platforms and chatbots are not confidential. Complaints, and in particular those containing the personal data of pupils, staff and other individuals therefore should not be uploaded to or processed via platforms such as ChatGPT.

16 Serial or persistent Complainants

If at any level a Complainant or connected party attempts to reopen an issue or a closely related issue that has already been dealt with under this complaints procedure, the School may write to the Complainant to inform him/her that the procedure has been exhausted, the matter is closed and the School will therefore not respond to any further correspondence on this issue or a closely related issue.

17 Vexatious complaints

- 17.1 Complaints with the following characteristics may be deemed to be vexatious:

- obsessive, persistent, harassing, prolific, repetitious;
- insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;
- insistence upon pursuing meritorious complaints in an unreasonable manner;
- complaints which are designed to cause disruption or annoyance;
- demands for redress that lack any serious purpose or value;
- failure to maintain confidentiality in line with this policy.

In such cases, the School may write to the Complainant to inform him/her that the complaint is deemed to be vexatious and to give him/her an opportunity to change their approach. Should the complaint continue to be raised in a vexatious manner, the School will write to the complainant confirming that it will not respond to any further correspondence on this issue or a closely related issue.

- 17.2 The DfE Best Practice Guidance for School Complaints Procedures will be taken into account in reaching any decision to stop responding. Specifically, the following criteria will usually be met:

- the School will have taken every reasonable step to address the complainant's concerns;
- the complainant will have been given a clear statement of the School's position and their options; and
- the complainant contacts the School repeatedly, making substantially the same points each time.

The case to stop responding will be stronger if one or more of the following applies:

- the complainant's letters, emails, or telephone calls are often or always abusive or aggressive;
- the complainant makes insulting personal comments about or threats towards staff;
- the School has reason to believe the individual is contacting them with the intention of causing disruption or inconvenience.

17.3 Complainants are also referred to the Parentkind parent guide to school complaints which emphasises the importance of trying to work with the school to resolve the issue and explains steps that schools may take where complainants act unreasonably including pausing the complaint, issuing a warning and, in cases of persistent or extreme abusive behaviour, banning the complainant from the school site.

18 Legal proceedings

If a Complainant threatens or commences legal action against the School (including the issuing of a letter before claim) in relation to their complaint, we will consider whether to suspend the complaints procedure in relation to their complaint until those legal proceedings have concluded.

Appendix 1 – Complaints form

This form should be used to raise a formal complaint only after a matter has been raised informally and you are not satisfied with the response. Please refer to the Complaints Policy when completing this form.

The Complaints Form is designed to help capture all relevant information about your complaint and is provided to help ensure that the process can be followed effectively. You will note that the expectation is that the vast majority of complaints can be expressed in 3 pages or 1,500 words. Where that is not the case this may result in the School needing to seek further clarification from you which may unavoidably delay the process. Please consider the length of your complaint carefully.

Your details	
Name	
Email	
Address	
Name of pupil, year group and your relationship to them (<i>if applicable</i>)	
Complaint details	
Grounds of complaint	
What steps have been taken to resolve the complaint informally (<i>including details of who the matter was raised with, when and what solution was offered</i>)	
Why have the steps taken so far failed to resolve the complaint? (<i>including what you consider should have been done/where the School has not met reasonable expectations in its response</i>)	
Outcome sought	
What action would you like taken to resolve the matter?	

Signed Date
.....

Please send completed forms to admin@secat.co.uk or hand in to the school office in a sealed envelope marked for the attention of the relevant addressee (*generally, this will be the Headteacher for complaints about a specific school, or the Clerk to the Trustees for complaints about the Trust, however, please refer to the Complaints Policy and in particular paragraph 6, 'Complaints about specific role-holders', for further information*).