



Complaints Procedures Policy v3

Strive for Education

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Changes since last review:

School Bus update April 2026. New and updated information in this policy is highlighted in **blue filled and bold text**.

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1. Statement of intent

Strive for Education aims to resolve all complaints at the earliest possible stage and is dedicated to ensuring all complaints are managed sympathetically and efficiently.

Any complaint or concern will be taken seriously, whether formally or informally, and the appropriate procedures will be implemented. This policy has been created to deal with any complaint against a member of staff, or the school as a whole, relating to any aspects of the school or the provision of facilities or services.

The school will ensure the complaints procedure is:

- Easily accessible and publicised on the school's website.
- Simple to understand and put into practice.
- Impartial and fair to all parties involved.
- Respectful of confidentiality duties.
- Continuously under improvement, using information gathered during the procedure.
- Fairly investigated, by an independent person when necessary.
- Used to address all issues to provide appropriate and effective responses where necessary.

2. **[Updated]** Legal framework

This policy has due regard to legislation including, but not limited to, the following:

- Freedom of Information Act 2000
- Education Act 2002
- Equality Act 2010
- The Education (Independent School Standards) Regulations 2014
- Education and Skills Act 2008
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- **[NEW]** ICO How to deal with data protection complaints

This policy also has due regard to related guidance including, but not limited to, the following:

- DfE (2019) 'The Independent School Standards'

[Updated] This policy will be implemented in accordance with the following school policies:

- Admissions Policy
- Child Protection and Safeguarding Policy
- Behaviour and Positive Relationships Policy
- Suspension and Exclusion Policy
- Whistleblowing Policy
- Data Protection Policy
- Records Management Policy
- Grievance Policy

3. **[Updated]** Definitions

For the purpose of this policy:

- A **"complaint"** can be defined as 'an expression of dissatisfaction' towards the actions taken or a perceived lack of action taken.
- A **"concern"** can be defined as 'an expression of worry or doubt' where reassurance is required; concerns will be classed and addressed as complaints.
- **"Complainants"** are those who have raised a concern or a complaint.
- A **"grievance"** is an issue raised by a member of staff where they feel the school has not implemented a policy or process fairly or properly. Grievances will be dealt with in line with the school's Grievance Policy.
- **"Days"** relate to school days.
- The definition of **"unreasonable complaints"** is outlined in the 'Managing unreasonable complaints' section of this policy.
- For the purpose of this policy, **"duplicate complaints"** are identical complaints e.g. complaints regarding the same matter received from a complainant's spouse, partner or child. These complaints will not be addressed again and the individual making the second complaint will be informed that the complaint has been dealt with on a local level. If the individual is

dissatisfied with the result, they can appeal. Any new details provided by a complainant's spouse, partner or child, however, will be investigated and managed in line with the complaints procedure.

Any complaint or concern will be taken seriously, whether raised formally or informally, and the appropriate procedures will be implemented.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use formal stages of the complaints procedure. Any concerns will be taken seriously and every effort will be taken to resolve the matter as quickly as possible.

If an individual has difficulty discussing a concern with a particular staff member, the school will respect the views of this individual. In these cases, the person managing the complaint will refer the complainant to another staff member. The member of staff may be more senior but does not have to be. The ability to consider the concern objectively and impartially is more important.

The school understands, however, that there will be occasions where people would prefer to raise their concerns formally. In this case, the school will attempt to resolve the issue internally, through the stages outlined within this complaints procedure.

4. Eligibility to make a complaint

Parents of students currently being educated at the school are able to make a complaint in line with this policy.

All complaints will be treated seriously and confidentially. Parents will be assured that their children will not be penalised if they raise a complaint.

This policy does not cover complaints made by the following:

- Parents of students who have left voluntarily or as a result of being excluded (except where the complaints process was started when the student was still being educated at the school)
- Students
- Prospective students and their parents, and the failure to admit such students

5. Timescales

Complaints are expected to be made as soon as possible after an issue arises to ensure the issue is addressed in an appropriate timescale.

The school upholds a three month time limit in which a complaint can be lodged following an incident. Complaints made outside this time limit will not be automatically refused and exceptions will be considered.

Timescales for managing complaints at specific stages are outlined in the relevant sections of this policy. In the case of any timescales changing, all parties involved will be informed of the changes in a timely manner.

6. **[Updated]** Informal raising of a concern

The school will endeavour to resolve most concerns informally.

Concerns will be raised initially as follows:

Type of concern	Individual to whom a concern should be raised
Educational issues	The relevant teacher – the concern will be passed to a more senior member of staff if appropriate.
Pastoral care issues	The Deputy Headteacher
Behavioural issues	The staff member who imposed the behaviour sanction and / or the Centre Lead
Financial matters	The Operations Director
Other concerns	The Headteacher
Concerns regarding the Headteacher	The Deputy Headteacher

A complaint may be made in person, by telephone or in writing. A written record will be kept of all concerns and the date on which they were received. A concern provided in writing will be acknowledged by telephone or in writing within two days of receipt during term time and as soon as practicable during school holidays.

If the concern is not resolved within five days or, in the event that the complainant is not satisfied with the response to their concern, the complainant will be advised to proceed in accordance with the ['Formal complaint'](#) stage of this procedure.

7. **[Updated]** Formal complaint

The complainant should submit their complaint in writing to the Headteacher. The complaint will be acknowledged by telephone or in writing within two days of receipt during term time and as soon as practicable during school holidays, indicating that action is being taken and the likely timescales.

The Headteacher will meet with the complainant within five days of acknowledging receipt of the complaint to discuss the matter. If the complaint is about the Headteacher, the discussion will take place with the Deputy Headteacher.

During the meeting, the Headteacher will attempt to reach a resolution; however, it may be necessary for further investigations to be carried out by the Headteacher or another designated member of staff. If the complaint is about the Headteacher, the Deputy Headteacher will arrange any necessary investigations.

Written records will be kept of all meetings and other communications held in relation to the complaint.

Once all facts are established, the Headteacher will inform the complainant of their decision and their reasoning in writing.

If the complaint is about the Headteacher, the Assistant Headteacher will inform the complainant of their decision and their reasoning in writing.

The complainant will be informed of the decision within 10 days from the receipt of the complaint. Where there are exceptional circumstances resulting in a delay, the complainant will be notified of this and informed of the new timescales as soon as possible.

If the complainant is not satisfied with the outcome suggested, they will be advised to proceed to the ['Panel hearing'](#) stage of this procedure.

8. Panel hearing

Where a complaint cannot be resolved, a hearing before a panel appointed by or on behalf of the school's proprietor will be arranged.

The panel will consist of at least three people who were not directly involved in the matters detailed in the complaint. One panel member will be independent of the management and running of the school – this means they are not a member of the school's workforce or proprietor body and are not otherwise involved in the management of the school, e.g. a solicitor who regularly acts for the school.

A hearing will be scheduled to take place as soon as practicable and normally within 10 days. Reasonable arrangements will be made to ensure the complainant can attend the panel hearing. If the complainant does not exercise the right to attend the panel hearing, the hearing will still be held.

The complainant will be informed that they are able to be accompanied at the hearing if they wish; however, legal representation will not normally be appropriate.

The right for a parent to be accompanied at a panel hearing does not confer a right on a parent to have a legal representative make representations on their behalf at a hearing, but the school will decide whether to allow this on a case-by-case basis.

If the panel deems it necessary, it may require that further details of the complaint or any related matters be supplied in advance of the hearing. Copies of such information will be supplied to all parties no later than five days prior to the hearing.

After considering all of the relevant facts, the panel will make findings and recommendations. The decision, findings and recommendations will be provided to the complainant in writing within five days of the hearing. A copy of the decision, findings and recommendations will be sent to, where relevant, the person complained about and the Headteacher.

The decision of the panel will be final and represents the conclusion of the school's complaints procedure.

If it is found that the school has not met its requirements in relation to managing complaints because of the way a particular complaint has been handled, the Secretary of State has no power to compel the school to alter its decision on that complaint, only to take regulatory action designed to address the failure to meet the complaints standard, so that future complaints are dealt with properly.

9. Recording complaints

A written record will be kept of any complaint made, detailing:

- Whether the complaint was resolved following an informal route, formal route or panel hearing.
- Actions taken by the school as a result of the complaint (regardless of whether the complaint was upheld).

Additional records may be kept containing the following information:

- The date the issue was raised
- The name of the complainant and, where relevant, their child
- A description of the issue
- Records of all the investigations
- Witness statements
- The name of the staff member responsible for handling the issue at each stage
- Copies of correspondence on the issue

Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education and Skills Act 2008 requests to access them.

10. **[NEW]** Managing unreasonable complaints

The school is committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who complain. The school will not normally limit the contact complainants have with the school itself; however, the school does not expect staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive or threatening.

For the purposes of this policy, “**unreasonable complaints**” include:

- Vexatious complaints, which:
 - Are obsessive, persistent, harassing, prolific, or repetitious.
 - Insist upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason.
 - Insist upon pursuing meritorious complaints in an unreasonable manner.
 - Are designed to cause disruption or annoyance.
 - Demand for redress which lacks any serious purpose or value.
- Serial or persistent complaints, which:

- Are duplicated, sent by the same complainant once the initial complaint has been closed.
- Are new complaints that are submitted additionally, as part of an existing open complaint, by the same complainant.

A complaint may also be regarded as unreasonable when the complainant:

- Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance.
- Refuses to cooperate with the complaints investigation process while still wishing their complaint to be resolved.
- Refuses to accept that certain issues are not within the scope of a complaints procedure.
- Insists on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Introduces trivial or irrelevant information which they expect to be taken into account and commented on or raises large numbers of detailed but unimportant questions and insists they are fully answered, often immediately and to their own timescales.
- Makes unjustified complaints about staff who are trying to deal with the issues and seeks to have them replaced.
- Changes the basis of the complaint as the investigation proceeds.
- Repeatedly makes the same complaint despite previous investigations or responses concluding that the complaint is groundless or has been addressed.
- Refuses to accept the findings of the investigation into that complaint where the school's complaints procedure has been fully and properly implemented and completed, including referral to the DfE.
- Seeks an unrealistic outcome.
- Makes excessive demands on school time by frequent, lengthy, complicated and stressful contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.

A complaint may also be considered unreasonable if the complainant:

- Acts maliciously or aggressively.
- Uses threats, intimidation or violence.
- Uses abusive, offensive or discriminatory language.
- Knows the complaint to be false.
- Uses falsified information.

- Publishes unacceptable information in media such as social media websites and newspapers.

The above applies regardless of the method the complaint is made, e.g. face-to-face, by telephone, in writing or electronically.

Complainants should limit the number of communications with the school while a complaint is being progressed. It is not helpful if repeated correspondence is sent, either by letter, phone, email or text, as it could delay the outcome being reached.

Whenever possible, the person leading the response to a complaint will discuss any concerns with the complainant informally before applying an 'unreasonable' marking.

Serial or persistent complaints will only be marked as 'serial' once the complainant has completed the complaints procedure. It is the complaint that will be marked as 'serial', meaning the complainant can complain about a separate issue if necessary. A complaint will not be marked as serial where a complainant has exercised their right to refer their complaint to their MP.

If the behaviour continues, the individual handling the complaint will write to the complainant explaining that their behaviour is unreasonable and asking them to change it. For complainants who excessively contact the school or any of its academies causing a significant level of disruption, the school may specify methods of communication and limit the number of contacts in a communication plan. This will usually be reviewed after six months.

A decision to stop responding will only be considered in circumstances where the following statements are true:

- Every reasonable step has been taken to address the complainant's concerns
- The complainant has been given a clear statement of the school's position and their options
- The complainant contacts the school or any of its academies repeatedly, making substantially the same points each time

If the above criteria are met, in making a decision to stop responding, the school will also consider if the complainant is often or always abusive or aggressive in their communication, makes insulting personal comments about or threats towards staff, or if the school believes their intent is to disrupt or inconvenience the school or its academies.

The school will not stop responding to a complainant on the basis that they are difficult to deal with or they ask complex questions.

In response to any serious incident of aggression or violence, the concerns and actions taken will be put in writing immediately and the police informed. This may include banning an individual from the premises.

11. [NEW] Barring from the premises

School premises are private property and therefore any individual may be barred from entering the premises.

If an individual's behaviour is cause for concern, the headteacher of the relevant academy will ask the individual to leave the premises.

The headteacher will notify the parties involved in writing, explaining that their implied licence for access to the premises has been temporarily revoked and why, subject to any representations that the individual may wish to make. The individual involved will be given the opportunity to formally express their views regarding the decision to bar them.

Anyone wishing to make a complaint regarding a barring order can do so in writing, including via email, to the Headteacher.

12. [NEW] Handling data protection complaints

The school will maintain a clear, consistent and accessible process for handling data protection complaints across all academies, in line with legal requirements and good practice. The school is the data controller and retains overall responsibility for compliance, although complaints may be received and managed at academy level on its behalf.

The school will treat as a data protection complaint any concern that personal data has been managed in breach of data protection law, e.g. rights requests, data security, collection, use, retention or accuracy of data.

Complainants will not be required to use legal terminology. Where unclear, the school will seek clarification. Complaints primarily about service issues that include a data rights request will not automatically be treated as data protection complaints.

The school will provide accessible ways for individuals to submit complaints, e.g. email, form, telephone, post, in person, via its academies or central functions, and will accept complaints made through any channel.

Where complaints are received via insecure channels, e.g. social media, the school will request a secure method of communication. The school will inform individuals of their right to complain at the point of data collection and within relevant responses, using clear and age-appropriate language.

The school will:

- Treat a complaint as received when it is received by any academy or the school's central team.
- Acknowledge receipt within 30 calendar days from the day after receipt.
- Ensure arrangements are in place across the school and all academies to meet this timescale, including during staff absence.
- Confirm receipt and next steps using the complainant's preferred or original contact method where appropriate.
- Verify identity where necessary and request only proportionate evidence.
- Verify authority where a complaint is made on behalf of another individual before proceeding.

Investigation

The school will:

- Begin investigating without undue delay, regardless of whether the complaint is managed locally or centrally.
- Ensure clear internal escalation and coordination between academies and central school teams.
- Make appropriate and proportionate enquiries, including reviewing records, consulting with relevant staff across academies, and assessing compliance with policies and law.
- Seek further information from the complainant where needed and clarify the desired outcomes.
- Take into account the complexity, scale (including multi-academy issues) and potential harm when determining timescales.
- Keep the complainant informed of the complaint investigation progress and any delays.

Children and additional considerations

The school recognises that children have the same data protection rights as adults and will:

- Communicate in clear, age-appropriate language.
- Assess their understanding, where required.
- Provide mechanisms for children to raise concerns, including indicating urgency.
- Prioritise safeguarding concerns and act promptly where risk is indicated.

Outcome

The school will:

- Provide a clear outcome without undue delay, explaining any findings, decisions and actions taken.
- Respond to each aspect of the complaint and provide supporting information where appropriate.
- Inform the complainant of their right to raise concerns with the ICO.
- Ensure outcomes are not delayed by alignment with wider complaints processes where the data protection element can be resolved sooner.
- Consider offering a review where appropriate, noting that individuals may contact the ICO at any time.

Record keeping and learning

The school will:

- Maintain a central or coordinated record of complaints received across all academies.
- Record key information including receipt, acknowledgement, investigation, outcome and actions taken.
- Ensure records are accurate, secure, organised and retained only as long as necessary.
- Monitor trends across academies to identify compliance risks and areas for improvement.

Responsibilities and governance

The school will:

- Ensure clear roles and responsibilities between academies and central teams for logging, investigating and responding to complaints.
- Ensure all staff across academies are trained to recognise and escalate data protection complaints promptly.
- Involve the school's DPO where appropriate, particularly in complex or high-risk cases.
- Ensure appropriate arrangements are in place with any processors to support investigations and provide necessary information.
- Maintain consistent procedures across school sites.

Regulatory context

The school will comply with its obligation to provide a complaints process, respond without undue delay, and acknowledge complaints within 30 days. Where a complaint is escalated, the school will function as the primary point of contact with the ICO and will cooperate as required.

13. [NEW] Transferring data

The school will hold records of complaints separate to pupil records while a complaint is ongoing, so that access to these records can be maintained.

Information that the school retains relating to a complaint will be stored securely and in line with its Records Management Policy.

14. [NEW] Availability

A copy of this policy will be made available on request. It will also be published on the school website, as recommended by the DfE.

15. [Updated] Monitoring and review

This policy will be reviewed annually. The next scheduled review date of this policy is May 2027.

All changes made to this policy will be communicated with all relevant stakeholders.