



## Complaints Policy

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### 1. Legal and Regulatory Framework

This policy complies with the following statutory and regulatory frameworks:-

- Part 7 of the Independent School Standards (ISS)
- Education Inspection Framework (EIF)
- SEND Code of Practice (0-25 years)
- Keeping Children Safe in Education (KCSIE)
- Equality Act 2010
- Working Together to Safeguard Children

### 2. Policy Statement

Keys Group is committed to providing a high-quality education and care for all pupils. We welcome feedback and take complaints seriously, using them as opportunities to learn and improve. This policy outlines a clear, fair, and accessible process for handling complaints from pupils, parents/carers, placing authorities, staff, and other stakeholders.

### 3. Aim and Scope

This policy applies to all complaints, whether informal or formal, and includes complaints from:-

- Pupils and their families.
- Placing authorities or external agencies.
- Those involving safeguarding concerns.
- Staff conduct or school procedures.
- Neighbours or members of the public.

### 4. Abbreviations and Definitions

- **Complainant:** The person making the complaint.
- **KCSIE:** Keeping Children Safe in Education.
- **LADO:** Local Authority Designated Officer.
- **UTE:** Untoward Event.



- **RADAR:** Management Information System used by Keys Group.
- **CPOMS:** Child Protection Online Monitoring System.

The Department for Education (DfE) defines:

- A **concern** as an expression of worry or doubt over an issue considered important for which reassurance is sought.
- A **complaint** as an expression of dissatisfaction, however made, about actions taken or a lack of action.

## 5. Policy Principles

- **Accessibility:** Complaints can be made verbally, in writing, or via assistive formats.
- **Transparency:** All complainants are informed of the process and timescales.
- **Safeguarding:** Complaints with safeguarding implications are referred immediately to the LADO.
- **Confidentiality:** All records are securely stored and shared only on a need-to-know basis.
- **Fairness:** Investigations are impartial and evidence-based.
- **Learning:** Complaints are used to inform school improvement.

### 5.1 Managing Challenging and/or Vexatious Complaints

While we aim to resolve all complaints respectfully, we recognise that some behaviours may hinder the process. The following behaviours may be deemed unreasonable and unacceptable:-

- Use of aggressive, abusive, derogatory or threatening language or conduct.
- Excessive or repetitive contact that disrupts school operations.
- Refusal to engage with the complaints process constructively.
- Publishing defamatory content online.

Our response strategy will be to:-

- initiate an informal discussion with the complainant to clarify expectations.
- issue a formal written warning outlining unacceptable behaviour if necessary.
- implement a communication plan, such as limiting contact to one channel.
- escalate the matter to the funding authority, legal or safeguarding authorities if required.

The school, together with Keys Group, is committed to its duty of care for all staff members and the wider school community. We enforce a zero-tolerance policy regarding the behaviours mentioned above. We reserve the right to implement appropriate measures to ensure the safety and wellbeing of staff and the community. In the most serious



circumstances, this may include convening an emergency review of the child's Education, Health and Care Plan (EHCP) with the local authority. If persistent behaviour by a parent or carer compromises the environment, the school may determine that it is unable to meet the needs of the family, necessitating consideration of an alternative provision.

## **6. Complaints Procedure**

For this procedure, it should be noted that working days relates only to those during term time and is not inclusive of school holiday periods.

### **6.1 Stage 1 – Informal Resolution**

Complaints may be raised with any staff member and resolved verbally or via a simple written record. Staff will aim to resolve concerns promptly and respectfully, usually within five working days. All outcomes will be recorded on RADAR. Pupils will be offered advocacy support throughout this process. If the complaint remains unresolved and/or the complainant wishes to make it formal, it will progress to Stage 2.

### **6.2 Stage 2 – Formal Investigation**

Formal complaints must be in writing addressed to the Headteacher. using the Complaints Record Form (Appendix A or B), the Headteacher will log the complaints onto RADAR. The complainant will receive an acknowledgement within two working days. An Investigations Manager will be appointed by the Regional Director or Executive Headteacher to conduct a full investigation using the Investigation Action Plan (Appendix E). A written report detailing the findings and any actions taken will be shared with the complainant within 28 working days. The complainant will be kept informed of progress and any delays. If the complainant is dissatisfied with the outcome, they may appeal to the Complaints Review Panel.

### **6.3 Stage 3 – Complaints Review Panel**

The Complaints Review Panel will be convened within 15 working days following the receipt of an appeal request. The panel will include the Education Director or Regional Director, an independent person appointed by Keys Group who was not involved in the original complaint, and a senior staff member from Keys Group who was also not involved. The complainant may attend the panel hearing and may be accompanied by a non-legal representative, such as a local authority representative, family member or advocate. A minute-taker will be appointed by Keys Group and the complainant may make notes during the meeting but may not record the meeting.

Following the meeting, the panel will review all evidence, hear from all parties, and make findings and recommendations. A written outcome will be provided to all parties, and the decision of the panel will be final. Records of the panel's findings and recommendations will be kept and made available for inspection by the proprietor and Headteacher.

## **7. Safeguarding Complaints**

Complaints involving safeguarding concerns will override this policy and be managed in accordance with the Safeguarding Policy. Such complaints must be referred immediately to the Local Authority Designated Officer (LADO). The safety and wellbeing of the pupil will be the paramount consideration throughout.



## **8. Monitoring and Review**

Complaints will be reviewed monthly by the Headteacher. Trends and patterns will be analysed to inform school improvement plans and staff training. Findings will be shared with the Senior Leadership Team, Governance Committees, and staff teams. Feedback on the complaints process will be sought to ensure accessibility and effectiveness. The policy will be reviewed annually or as required by regulatory changes.

## **9. Training and Awareness**

All staff will receive training on this policy during their induction. Refresher training will be provided annually. The complaints procedure will be displayed prominently in school premises, included in pupil handbooks and school prospectuses, and made available in accessible formats.

## **10. Equality and Accessibility**

We will ensure that all complainants, regardless of background, ability, or communication needs, can access and engage with the complaints process. Reasonable adjustments will be made, including providing advocacy support, alternative communication methods, and translation services where necessary.

## **11. External Escalation**

If a complainant remains dissatisfied after exhausting the school's complaints process, they may escalate their concerns to:

- Ofsted – Compliance and Investigation Enforcement Team, Freshford House, Redcliffe Way, Bristol, BS1 6NL, Tel: 08456 404040
- Secretary of State for Education under the Education and Inspections Act 2006.

## **12. Record Keeping and Confidentiality**

A written record of all complaints, investigations, and outcomes will be maintained securely for a minimum of six years. Records will include whether complaints were resolved at informal or formal stages, or proceeded to a panel hearing, and any actions taken. Correspondence, statements, and records relating to individual complaints will be kept confidential except where disclosure is required by law.



### 13. Appendices – Procedures and Localisation of Policy

#### Appendix A: Complaints Record Form (To be completed on RADAR)

<b>School:</b>		<b>Date and Time</b>	
Person Receiving Complaint (name, position):		Person Making Complaint:	
Acknowledgement Letter required (Y/N):		Brief Details of Complaint:	
Advocate offered/discussed (Y/N):		Immediate Action Taken:	
Outcome:		Complainant satisfied (Y/N):	
Further Action Required:		Headteacher notified (Y/N):	
Executive Headteacher notified (Y/N):		Director/Education Director notified (Y/N):	
Signed (person receiving):		Date:	



**Appendix B: Pupil Complaint Record (My Thinking Tool)**

<b>My Name:</b>		<b>Date:</b>	
What do you want to tell us?			
Who else was involved?		When did it happen?	
Where did it happen?		What I did?	
Advocate needed (Y/N)?		School Name:	
What could happen to make things better?			
Anyone else you'd like to speak to?			
My Signature:		Staff Signature:	
Staff Name:		Designation:	



### Appendix C: Standard Acknowledgement Letter (Pupil)

Dear ,

I confirm receipt of your complaint dated < > . Over the next < > , I will review your concerns thoroughly. I will arrange a meeting on or before to discuss findings and next steps. You may bring a representative or advocate.

Please contact me if you need support or updates.

Yours sincerely,

### Appendix D: Standard Acknowledgement Letter (Parent/Carer/Stakeholder)

Dear ,

I acknowledge receipt of your complaint regarding <School Name> received on < > . The matter is under investigation, and you will receive a full written response within < > .

Yours sincerely,

### Appendix E: Investigation Action Plan

Issue	Information to Review	Interviews to Conduct	Target Date	Comments
1				
2				
3				
4				



## Appendix F: Investigation Checklist

Step	
Complaint logged on RADAR/CPOMS	
Complaint Record Form completed	
Acknowledgement letter sent	
Investigation Manager appointed	
Investigation report completed	
Action plan signed off	
Correspondence and records securely stored	
Outcome recorded (substantiated, not substantiated, partially substantiated)	



### **Appendix G: Stage 1 Flowchart – Informal Resolution**

1. Complaint received
2. Gather facts and clarify issues
3. Record complaint on RADAR
4. Attempt resolution through discussion/negotiation
5. Record outcome and complainant satisfaction
6. If unresolved, escalate to Stage 2

### **Appendix H: Stage 2 Flowchart – Formal Investigation**

1. Complaint received
2. Acknowledge within 2 school days
3. Appoint Investigation Manager
4. Conduct investigation using action plan
5. Provide written report within 28 school days
6. Complainant may appeal to Stage 3 Panel

### **Appendix I: Complaints Review Panel Briefing Note**

- Panel convened within 15 school days of appeal
- Panel members: Education Director/Regional Director, independent person, senior staff member not involved
- Panel reviews documents, hears parties
- Complainant may bring representative/advocate
- Panel makes findings and recommendations
- Written outcome provided; decision final
- Records retained and available for inspection