

Kent
Catholic
Schools'
Partnership



'Academies in Christ'
Part of the Archdiocese of Southwark

Trust & Academy Complaints Policy

Date of last review:	March 2021	Date of next review:	March 2023
Author:	Policy & Projects Mgr	Owner:	Trust Company Secretary
Type of policy:	Trust-wide	Approval:	Board of Directors

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1. Aims

The Kent Catholic Schools' Partnership ("the Trust") aims to meet its statutory obligations when responding to complaints.

When responding to complaints, the Trust aims to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement evaluation processes

The Trust will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.

The Trust will aim to give the complainant the opportunity to complete the complaints procedure in full.

To support this, the Trust will ensure that it publicises the existence of this Policy and make it available on the Trust and academy website.

Throughout the process, the Trust will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

2. Legislation and guidance

This document meets the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014, which states that the Trust must have and make available a written procedure to deal with complaints from parents of pupils at academies.

It is also based on guidance published by the Education and Skills Funding Agency (ESFA) on creating a complaints procedure that complies with the above regulations, and refers to good practice guidance on setting up complaints procedures from the Department for Education (DfE).

In addition, where applicable, it addresses duties set out in the Early Years Foundation Stage statutory framework with regards to dealing with complaints about the Trust's fulfilment of Early Years Foundation Stage requirements.

3. Definitions and scope

3.1 Definitions

The DfE guidance explains the difference between a concern and a complaint:

- A **concern** is defined as “an expression of worry or doubt over an issue considered to be important for which reassurances are sought”. The school will resolve concerns through day-to-day communication as far as possible
- A **complaint** is defined as “an expression of dissatisfaction however made, about actions taken or a lack of action”

3.2 Scope

The Trust intends to resolve complaints informally where possible, at the earliest possible stage.

There may be occasions when complainants would like to raise their concerns formally. This Policy outlines the procedure relating to handling such complaints.

This Policy does **not** cover complaints procedures relating to:

- Admissions
- Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- Exclusion
- Whistleblowing
- Staff grievances
- Staff discipline

Please see our separate policies for procedures relating to these types of complaint.

Complaints about services provided by other providers who use academy premises or facilities should be directed to the provider concerned.

4. Roles and responsibilities

4.1 The complainant

The complainant will get a more effective and timely response to their complaint if they:

- Follow these procedures
- Co-operate with the Trust or the Academy throughout the process, and respond to deadlines and communication promptly
- Treat all those involved with respect
- Not publish details about the complaint on social media

4.2 The investigator

An individual will be appointed to look into the complaint and establish the facts. They will:

- Interview all relevant parties, where relevant, keeping notes
- Consider records and any written evidence and keep these securely
- Prepare a comprehensive report to the Executive Principal/Headteacher (or other lead person from the Trust depending on the level of the complaint) which includes the facts and potential solutions

4.3 Clerk

The Clerk will:

- Be the contact point for the complainant and the Complaints Panel, including circulating the relevant papers and evidence before Complaints Panel meetings
- Arrange the complaints hearing
- Record and circulate the minutes and outcome of the hearing

4.4 Complaints Panel Chair

The Chair will:

- Chair the meeting, ensuring that everyone is treated with respect throughout
- Make sure all parties see the relevant information, understand the purpose of the Complaints Panel, and are allowed to present their case.

5. Principles for investigation

When investigating a complaint, we will try to clarify:

- What has happened
- Who was involved
- What the complainant feels would put things right

5.1 Time scales

The complainant must raise the complaint within 3 months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within 3 months of the last incident.

The Trust will consider exceptions to this time frame in circumstances where there were valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved.

When complaints are made out of term time, the timescale stops running and the Trust will consider them to have been received on the next school day.

If at any point, the Trust or the Academy cannot meet the time scales we have set out in this Policy, the Trust will:

- Set new time limits with the complainant

- Send the complainant details of the new deadline and explain the delay

5.2 Complaints about our fulfilment of Early Years requirements

The Trust will investigate all written complaints relating to the Trust's fulfilment of the Early Years Foundation Stage requirements and notify the complainant of the outcome within 28 days of receiving the complaint.

The Trust will keep a record of the complaint (see section 13) and make this available to Ofsted on request.

Parents and carers can notify Ofsted if they believe that the Trust is not meeting Early Years Foundation Stage requirements, by calling 0300 123 4234 or 0300 123 4666, or by emailing enquiries@ofsted.gov.uk. An online contact form is also available at <https://www.gov.uk/government/organisations/ofsted#org-contacts>.

6. General complaints (excluding complaints against the Chief Executive Officer, Directors of the Trust Board (incl the Chair of the Trust Board), Executive Officers, Executive Principal, Headteacher or Governance Committee Members)

6.1 Stage 1: informal

- The complainant should raise the complaint as soon as possible with the relevant member of staff or the Executive Principal/Headteacher at the relevant Academy, either in person or by letter, telephone or email.
- If the complainant is unclear who to contact or how to contact them, they should contact the relevant Academy office either in person or by phone/email.
- The Academy will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.
- The Academy will acknowledge informal complaints within 5 school days and investigate and provide a response within 20 school days. If a response cannot be provided within 20 school days, the Academy will write to the complainant advising that additional time is required to investigate the complaint.
- The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate.
- If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 6.2 of this Policy.

6.2 Stage 2: formal

- The formal stage involves the complainant putting the complaint to the Executive principal/Headteacher:
 - In a letter or email
 - Over the phone
 - In person
 - Through a third party acting on their behalf
- The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.
- If complainants need assistance raising a formal complaint, they can contact the Academy office either in person or by phone/email.
- The Executive Principal/Headteacher (or other person appointed on their behalf) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within 20 school days.

If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform the Clerk to the Academy's Governance Committee in writing within 5 school days. Contact details can be found on the academy website or office.

6.3 Stage 3: review panel

- Complaints will be escalated to a Complaints Panel hearing stage if the complainant is not satisfied with the response to the complaint at the second, formal, stage.
- The Complaints Panel will be appointed by or on behalf of the Trust and must consist of at least 3 individuals who were not directly involved in the matters detailed in the complaint. At least 1 panel member must be independent of the management and running of the Academy. The Complaints Panel cannot be made up solely of Governance Committee members, as they are not independent of the management and running of the Academy. All panel members must have attended recent training on the handling of complaints organised by the Trust.
- The Complaints Panel will have access to the existing record of the complaint's progress (see section 13).
- The complainant must have reasonable notice of the date of the Complaints Panel review; however, the Complaints Panel reserves the right to convene at their convenience rather than that of the complainant. At the Complaints Panel meeting, the complainant and representatives from the Academy, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.
- The complainant must be allowed to attend the Complaint Panel meeting and be accompanied if they wish.
- At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.
- The Complaints Panel, the complainant and the Academy representative(s) will be given the chance to ask and reply to questions. Once the complainant and Academy representative(s) have presented their cases, they will be asked to leave, and evidence will then be considered.
- The Complaints Panel will then put together its findings and recommendations from the case. The Complaints Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant, the individual who is the subject of the complaint, and make a copy available for inspection by the Executive Principal/Headteacher.
- The Academy will inform those involved of the decision in writing within 10 school days.

7. Complaints against an Executive Principal or Headteacher

7.1 Stage 1: informal

- The complainant should raise the complaint made against an Executive Principal or Headteacher to the Chief Executive Officer (CEO) at:
Kent Catholic Schools' Partnership
Barham Court
Teston
Maidstone
Kent ME18 5BZ

Telephone: 01622 232662
Email: office@kcsp.org.uk
- The CEO (or an appropriate representative appointed to lead on their behalf "their Representative") will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.
- The CEO, or their Representative, will acknowledge informal complaints within 5 school days and investigate and provide a response within 20 school days. If a response cannot be provided within 20 school days, the Representative will write to the complainant advising that additional time is required to investigate the complaint.
- The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate.
- If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 7.2 of this Policy.

7.2 Stage 2: formal

- The formal stage involves the complainant putting the complaint to the Chief Executive Officer (CEO):
 - In a letter or email
 - Over the phone
 - In person
 - Through a third party acting on their behalf
- The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.
- If complainants need assistance raising a formal complaint, they can contact the Trust office either in person or by phone/email.
- The CEO, or their Representative, will appoint an appropriate individual to carry out an investigation. A full investigation report will be provided to the CEO and/or their Representative (where applicable).
- The CEO, or their Representative, will write a formal response to the complainant following receipt of an investigation report within 20 school days.
- If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform the Company Secretary of the Trust in writing within 5 school days (Michelle Boniface, mboniface@kcsp.org.uk).

7.3 Stage 3: review panel

- Complaints will be escalated to the Directors of the Trust Board if the complainant is not satisfied with the response to the complaint at the second, formal, stage.
- The Directors of the Trust Board will convene a Complaints Panel which must consist of at least 3 Directors of the Trust Board who were not directly involved in the matters detailed in the complaint and independent of the management and running of the Academy involved in the complaint. All panel members must have attended recent training on the handling of complaints organised by the Trust.
- The Complaints Panel will have access to the existing record of the complaint's progress (see section 13).
- The complainant must have reasonable notice of the date of the Complaints Panel review; however, the Complaints Panel reserves the right to convene at their convenience rather than that of the complainant. At the Complaints Panel meeting, the complainant and the relevant Executive Principal or Headteacher of the Academy, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.
- The complainant must be allowed to attend the Complaint Panel meeting and be accompanied if they wish.
- At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.
- The Complaints Panel, the complainant and the relevant Executive Principal or Headteacher of the Academy will be given the chance to ask and reply to questions. Once the complainant and relevant Executive Principal or Headteacher of the Academy have presented their cases, they will be asked to leave, and evidence will then be considered.
- The Complaints Panel will then put together its findings and recommendations from the case. The Complaints Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant the Executive Principal/Headteacher.
- The Trust will inform those involved of the decision in writing within 10 school days.

8. Complaints against a governance committee member, the governance committee or a Director of the Trust Board (including the Chair)¹

8.1 Stage 1: informal

- The complainant should raise the complaint to the Trust Company Secretary at:
Kent Catholic Schools' Partnership
Barham Court
Teston
Maidstone
Kent ME18 5BZ
- Telephone: 01622 232664
Email: office@kcsp.org.uk
- The Company Secretary (or an appropriate representative appointed to lead on their behalf, "their Representative") will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.
- The Company Secretary, or their Representative, will acknowledge informal complaints within 5 school days and investigate and provide a response within 20 school days. If a response cannot be provided within 20 school days, the Representative will write to the complainant advising that additional time is required to investigate the complaint.
- The informal stage may involve a meeting between the complainant and the relevant staff members and governance committee members, as appropriate.
- If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 8.2 of this Policy.

8.2 Stage 2: formal

- The formal stage involves the complainant putting the complaint to the Trust Company Secretary:
 - In a letter or email
 - Over the phone
 - In person
 - Through a third party acting on their behalf
- The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.
- If complainants need assistance raising a formal complaint, they can contact the Trust office either in person or by phone/email.
- The Company Secretary, or their Representative, will appoint an appropriate individual to carry out an investigation. A full investigation report will be provided to the Company Secretary, and/or their Representative (where applicable).
- The Company Secretary, or their Representative, will write a formal response to the complainant following receipt of an investigation report within 20 school days.
- If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform the Company Secretary of the Trust in writing within 5 school days (office@kcsp.org.uk).

8.3 Stage 3: review panel

¹ Including complaints against an academy committee member or the academy committee

- Complaints will be escalated to Directors of the Trust Board not previously involved in the complaint, if the complainant is not satisfied with the response to the complaint at the second, formal, stage.
- The Directors of the Trust Board will convene a Complaints Panel which must consist of at least 3 individuals who were not directly involved in the matters detailed in the complaint. At least 1 panel member must be from another academy governance committee (for complaints against governance committee members) or the Education Commission (for complaints against Trust Directors) who have not been involved in the complaint. All panel members must have attended recent training on the handling of complaints organised by the Trust.
- The Complaints Panel will have access to the existing record of the complaint's progress (see section 13).
- The complainant must have reasonable notice of the date of the Complaints Panel review however, the Complaints Panel reserves the right to convene at their convenience rather than that of the complainant. At the Complaints Panel meeting, the complainant and the relevant Director or Governance Committee member (or Representative of the Governance Committee), as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.
- The complainant must be allowed to attend the Complaint Panel meeting and be accompanied if they wish.
- At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.
- The Complaints Panel, the complainant and the relevant Director or Governance Committee member (or Representative of the Governance Committee), as appropriate will be given the chance to ask and reply to questions. Once the complainant and the relevant Director or Governance Committee member (or Representative of the Governance Committee) , as appropriate have presented their cases, they will be asked to leave, and evidence will then be considered.
- The Complaints Panel will then put together its findings and recommendations from the case. The Complaints Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant the Director or Governance Committee member (or Representative of the Governance Committee) , as appropriate.
- The Trust will inform those involved of the decision in writing within 10 school days.

9. Complaints against members of the Trust Executive team (not the CEO)

9.1 Stage 1: informal

- The complainant should raise the complaint made against a member of the Trust Executive team to the Chief Executive Officer (CEO) at:

Kent Catholic Schools' Partnership
Barham Court
Teston
Maidstone
Kent ME18 5BZ

Telephone: 01622 232662
Email: office@kcsp.org.uk
- The CEO (or an appropriate representative appointed on their behalf "their Representative") will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.
- The CEO, or their Representative, will acknowledge informal complaints within 5 school days and investigate and provide a response within 20 school days. If a response cannot be provided within 20 school days, the Representative will write to the complainant advising that additional time is required to investigate the complaint.

- The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate.
- If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 9.2 of this Policy.

9.2 Stage 2: formal

- The formal stage involves the complainant putting the complaint to the Chief Executive Officer (CEO):
 - In a letter or email
 - Over the phone
 - In person
 - Through a third party acting on their behalf
- The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.
- If complainants need assistance raising a formal complaint, they can contact the Trust office either in person or by phone/email.
- The CEO, or their Representative, will appoint an individual to carry out an investigation. A full investigation report will be provided to the CEO and/or their Representative (where applicable).
- The CEO, or their Representative, will write a formal response to the complainant following receipt of an investigation report within 20 school days.
- If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform the Chief Executive Officer in writing within 5 school days.

9.3 Stage 3: review panel

- Complaints will be escalated to the Directors of the Trust Board not previously involved in the complaint, if the complainant is not satisfied with the response to the complaint at the second, formal, stage.
- The Directors of the Trust Board will convene a Complaints Panel which must consist of at least 3 Directors who were not directly involved in the matters detailed in the complaint. All panel members must have attended recent training on the handling of complaints organised by the Trust.
- The Complaints Panel will have access to the existing record of the complaint's progress (see section 13).
- The complainant must have reasonable notice of the date of the Complaints Panel review; however, the Complaints Panel reserves the right to convene at their convenience rather than that of the complainant. At the Complaints Panel meeting, the complainant and the relevant Executive Team Member, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.
- The complainant must be allowed to attend the Complaint Panel meeting and be accompanied if they wish.
- At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.
- The Complaints Panel, the complainant and the relevant Executive Team Member, as appropriate will be given the chance to ask and reply to questions. Once the complainant and the relevant Executive Team Member, as appropriate have presented their cases, they will be asked to leave, and evidence will then be considered.
- The Complaints Panel will then put together its findings and recommendations from the case. The Complaints Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant Executive Team Member, as appropriate.

- The Trust will inform those involved of the decision in writing within 10 school days.

10. Complaints against the Chief Executive Officer

10.1 Stage 1: informal

- The complainant should raise the complaint against the Chief Executive Officer to the Chair of the Trust Board, at:

Kent Catholic Schools' Partnership
Barham Court
Teston
Maidstone
Kent ME18 5BZ

Telephone: 01622 232662

Please contact the office for email address details.

The Chair (or appoint another member of the Trust Board to act as their "Representative") will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.

- The Chair, or their Representative, will acknowledge informal complaints within 5 school days and investigate and provide a response within 20 school days. If a response cannot be provided within 20 school days, the Representative will write to the complainant advising that additional time is required to investigate the complaint.
- The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate.
- If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 10.2 of this Policy.

10.2 Stage 2: formal

- The formal stage involves the complainant putting the complaint to the Chair of the Trust Board:
 - In a letter or email
 - Over the phone
 - In person
 - Through a third party acting on their behalf
- The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.
- If complainants need assistance raising a formal complaint, they can contact the Trust office either in person or by phone/email.
- The Chair will appoint an individual to carry out an investigation. A full investigation report will be provided to the Chair and their Representative (where applicable).
- The Chair, or their Representative, will write a formal response to the complainant following receipt of an investigation report within 20 school days.
- If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform the Chair of the Trust Board in writing within 5 school days..

10.3 Stage 3: review panel

- Complaints will be escalated to the Directors of the Trust Board not previously involved in the complaint, if the complainant is not satisfied with the response to the complaint at the second, formal, stage.

- The Directors of the Trust Board will convene a Complaints Panel which must consist of at least 3 Directors who were not directly involved in the matters detailed in the complaint and a suitably trained person(s) appointed by the Diocese. All Directors of the Trust Board acting as panel members must have attended recent training on the handling of complaints organised by the Trust.
- The Complaints Panel will have access to the existing record of the complaint's progress (see section 13).
- The complainant must have reasonable notice of the date of the Complaints Panel review; however, the Complaints Panel reserves the right to convene at their convenience rather than that of the complainant. At the Complaints Panel meeting, the complainant and the CEO, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.
- The complainant must be allowed to attend the Complaint Panel meeting and be accompanied if they wish.
- At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.
- The Complaints Panel, the complainant and the CEO, as appropriate will be given the chance to ask and reply to questions. Once the complainant and the CEO, as appropriate have presented their cases, they will be asked to leave, and evidence will then be considered.
- The Complaints Panel will then put together its findings and recommendations from the case. The Complaints Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, the CEO, as appropriate.
- The Chair will inform those involved of the decision in writing within 10 school days.

11. Complaints against the whole Trust Board

- The complainant should raise the complaint made against the whole Trust Board to the Trust Company Secretary at:
 Kent Catholic Schools' Partnership
 Barham Court
 Teston
 Maidstone
 Kent ME18 5BZ
- Telephone: 01622 232664
 Email: office@kcsp.org.uk
- The Company Secretary will contact the Members of the Trust Board, via the Office of the Archdiocese of Southwark, who will appoint an appropriate individual to manage the complaint.

12. Referring complaints on completion of the Trust's procedure

If the complainant remains unsatisfied with the outcome of the Trust's complaints procedure, they can refer their complaint to the Education, Skills and Funding Agency (ESFA). The ESFA will check whether the complaint has been dealt with properly by the Trust. The ESFA will not overturn a Trust's decision about a complaint. However, it will look into:

- Whether there was undue delay, or the Trust did not comply with its own complaints procedure
- Whether the Trust was in breach of its funding agreement with the secretary of state
- Whether the Trust has failed to comply with any other legal obligation

If the Trust did not deal with the complaint properly, it will be asked to re-investigate the complaint. If the Trust's complaints procedure is found to not meet regulations, the Trust will be asked to correct its procedure accordingly. For more information or to refer a complaint, see the following webpage:

<https://www.gov.uk/government/publications/complain-about-an-academy>

The Trust will include this information in the outcome letter to complainants.

13. Persistent complaints

13.1 Unreasonably persistent complaints

Most complaints raised will be valid, and therefore the Trust and its Academies will treat them seriously. However, a complaint may become unreasonable if the person:

- Has made the same complaint before, and has already been resolved by following the Trust's complaints procedure;
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive;
- Knowingly provides false information;
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure;
- Pursues a valid complaint, but in an unreasonable manner e.g. refuses to articulate the complaint, refused to co-operate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out;
- Changes the basis of the complaint as the investigation goes on;
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time;
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value;

Steps that will be taken

The Trust and its Academies will take every reasonable step to address the complainant's concerns and give them a clear statement of our position and their options. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal (as outlined above) wherever possible.

If the complainant continues to contact the Trust in a disruptive way, we may put communications strategies in place. We may:

- Give the complainant a single point of contact via an email address
- Limit the number of times the complainant can make contact, such as a fixed number per term
- Ask the complainant to engage a third party to act on their behalf, such as [Citizens Advice](#)
- Put any other strategy in place as necessary

Stopping responding

The Trust or one of its Academies may stop responding to the complainant when all of these factors are met:

- The Trust or the Academy believe we have taken all reasonable steps to help address their concerns
- The Trust or the Academy have provided a clear statement of our position and their options
- The complainant contacts us repeatedly, and the Trust or the Academy believe their intention is to cause disruption or inconvenience

Where the Trust or the Academy stop responding, the Trust or the Academy will inform the individual of its intention to do so. The Trust or the Academy will also explain that any new complaints made will still be considered.

In response to any serious incident of aggression or violence, the Trust or the Academy will immediately inform the police and communicate our actions in writing. This may include barring an individual from our Trust/Academy site.

13.2 Duplicate complaints

If the Trust or the Academy have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, the Trust or the Academy will assess

whether there are aspects that it had not previously considered, or any new information it need to take into account.

If the Trust or the Academy are satisfied that there are no new aspects, it will:

- Tell the new complainant that the Trust or the Academy has already investigated and responded to this issue, and the local process is complete
- Direct them to the ESFA (see Section 11 if they are dissatisfied with our original handling of the complaint)

If there are new aspects, the Trust or the Academy will follow this procedure again.

13.3 Complaint campaigns

Where the Trust or an Academy receives a large volume of complaints about the same topic or subject, especially if these come from complainants unconnected with the Trust or the Academy, the Trust or an Academy may respond to these complaints by:

- Publishing a single response on the Trust/Academy website
- Sending a template response to all of the complainants

If complainants are not satisfied with the response from the Trust or an Academy, or wish to pursue the complaint further, the normal procedures will apply.

14. Record keeping

The Trust and its Academies will record the progress of all complaints, including information about actions taken at all stages, the stage at which the complaint was resolved, and the final outcome. The records will also include copies of letters and emails, and notes relating to meetings and phone calls.

This material will be treated as confidential, held at the Academy or Trust depending on the level of the complaint, and will be viewed only by those involved in investigating the complaint or on the review panel.

This is except where the Secretary of State (or someone acting on their behalf) or the complainant requests access to records of a complaint through a freedom of information (FOI) request or through a subject access request (SAR) under the terms of the Data Protection Act, or where the material must be made available during a school inspection.

Records of complaints will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and the Trust Records Management Policy.

The details of the complaint, including the names of individuals involved, will not be shared with the whole governance committee/Trust Board in case a Complaint Panel needs to be organised at a later point.

Complainants also have the right to request an independent panel if they believe there is likely to be bias in the proceedings. The decision to approve this request is made the governance committee, or Trust Board of Directors (depending on the level of the complaint), who will not unreasonably withhold consent.

15. Learning lessons

The governance committee / Trust Board of Directors will review any underlying issues raised by complaints with Senior Leaders, where appropriate, and respecting confidentiality, to determine whether there are any improvements that the Trust or an academy can make to its procedures or practice to help prevent similar events in the future.

16. Monitoring arrangements

The governance committee and the Trust Board of Directors will monitor the effectiveness of the complaints procedure in ensuring that complaints are handled properly including tracking the number and nature of complaints, and review underlying issues as stated in section 14.

17. Links with other policies

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Admissions policy
- Exclusions policy
- Staff grievance procedures
- Staff disciplinary procedures
- SEN policy and information report
- Privacy notices