

Complaints Policy

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1. Aims

Our school aims to meet its statutory obligations when responding to complaints from parents/carers of pupils at the school, and other users of Pace.

When responding to complaints, we aim to:

- Encourage resolution of problems by informal means wherever possible
- 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
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement processes

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

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

To support this, we will make sure we publicise the existence of this policy and make it available on the school website.

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

By following the above aims we will work within our own values: Child & Family Centred, Innovative, Specialist, Dedicated, Compassionate and Aspirational.

2. Legislation and guidance

This document meets the requirements of The Independent Schools standards and was written based on the good practice guidance as defined by the Department for Education. Other legislation that applies to this policy are the Equality Act 2010 and GDPR (Data Protection Act).

3. Scope

This policy covers feedback, concerns and complaints, excluding those in the exclusion criteria below.

Feedback, concerns, and complaints each play distinct roles in understanding and improving families' experiences of Pace School:

1. **Feedback:**

- **Definition:** General information provided by guardians, students or carers about their experiences within the school.
- **Purpose:** Pace will use feedback to gauge overall satisfaction and identify areas for improvement. Constructive feedback may not create immediate change. It will be heard, recognised, and used to understand the general satisfaction levels and themes the school can improve.
- **Timing:** Guardians, students or carers can provide feedback at any time via email, parent survey, parent voice or face-to-face.
- **Nature:** Feedback can be positive, neutral, or negative and is typically more general.

2. Concerns:

- **Definition:** Specific issues or worries that guardians, students or carers express about their experiences in school. **Purpose:** To address potential problems before they escalate into complaints. Concerns will be dealt with in line with the time scales of stage one of our complaint process outlined below and will seek to find a resolution without wider-scale investigation or report writing.
- **Timing:** Concerns should be raised within 90 days of the issue arising. It should be raised one at a time to give Pace the time to investigate and respond appropriately to the concern
- **Nature:** Concerns should be more detailed and focused on specific aspects of the guardians, students or carers. Concerns should be specific, and examples of evidence should be provided when possible.

3. Complaints:

- **Definition:** Complaints are expressions of dissatisfaction with specific aspects of the school.
- **Purpose:** To highlight significant issues that need immediate resolution. The process below details the level, timings and deliverables for complaints.
- **Timing:** Complaints should be raised within 90 days of the issue arising. It should be raised one at a time to give Pace the time to investigate and respond appropriately to the complaint
- **Nature:** Complaints should be specific, and examples of evidence should be provided when possible so that immediate action can be taken. Complainants will be asked for their desired resolution, and an investigation and report will be delivered.

Understanding these differences helps Pace effectively address your needs and improve overall satisfaction.

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

- Admissions
- Safeguarding matters
- Whistle-blowing
- Staff grievances or discipline

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

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 school throughout the process, and respond to deadlines and communication promptly
- Ask for assistance as needed
- Treat all those involved with respect
- Do not approach individual staff or trustees about the complaint
- Do 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, keeping notes
- Consider records and any written evidence and keep these securely
- Prepare a comprehensive report to the headteacher or complaints committee, which includes the facts and potential solutions

4.3 The complaints co-ordinator

The complaints co-ordinator can be:

- The headteacher
- Any other staff member providing administrative support

The complaints co-ordinator will:

- Keep the complainant up to date at each stage in the procedure
- Make sure the process runs smoothly by liaising with staff members, the headteacher, chair of trustees and complainant
- Be aware of issues relating to:
 - Sharing third-party information
 - Additional support needed by complainants; for example, interpretation support
- Keep records

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 Timescales

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.

We will consider exceptions to this timeframe 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, we will consider them to have been received on the first school day after the holiday period.

If at any point we cannot meet the timescales we have set out in this policy, we will:

- Set new time limits with the complainant
- Send the complainant details of the new deadline and explain the delay

6. Stages of complaint (not complaints against the headteacher)

We have adopted a 3-stage process for dealing with complaints:

- Stage 1 – informal resolution
- Stage 2 – formal investigation
- Stage 3 – review panel

6.1 Stage 1: informal

Our school will take informal complaints 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 complainant should raise the complaint as soon as possible within the timescales set out in section 5.1.

The complaint should be addressed to the relevant member of school staff or the headteacher, either in person or by letter, telephone or email.

The school will acknowledge informal complaints within 5 school days by email, which will confirm how the school intends to proceed, including an indication of the anticipated timescale.

The informal stage will involve a meeting between the complainant and the Deputy headteacher. A written response will be provided by the school within 10 school days following the informal meeting.

If the complaint is not resolved informally, it will be escalated to a formal complaint.

6.2 Stage 2: formal

The formal stage involves the complainant putting the complaint to the headteacher:

- In a letter or email (this is preferred)
- Over the phone
- In person

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.

The headteacher will record the date the complaint is received and will acknowledge receipt of the complaint in writing (by email) within 5 school days.

The headteacher (or other person appointed by the headteacher for this purpose) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within 15 school days.

How to escalate a complaint

If the complainant wishes to proceed to the next stage of the procedure, they should inform the Chief Executive in writing within 10 school days. Requests received outside of this timeframe will be considered in exceptional circumstances.

- By letter or email
- Over the phone
- In person

The Chief Executive will need the details of the complaint as set out above, as well as details from the complainant on how they feel the previous stage of the procedure has not addressed their complaint sufficiently, and what they feel would resolve the complaint.

The Chief Executive will acknowledge receipt of the request within 5 school days by email.

6.3 Stage 3: review panel

Convening the panel

Complaints will be escalated to the panel hearing stage if the complainant is not satisfied with the response to the complaint at the second, formal stage.

The panel will be appointed by the Chair of Trustees and must consist of at least 3 people 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 school.

The panel will have access to the existing record of the complaint's progress (see section 10).

The complainant must have reasonable notice of the date of the review panel. The Chair will aim to find a date within 20 school days of the request, where possible.

If the complainant rejects the offer of 3 proposed dates without good reason, the Chair will set a date. The hearing will go ahead using written submissions from both parties.

Any written material will be circulated to all parties at least 5 school days before the date of the meeting.

The panel will ensure that the hearing is properly minuted.

At the meeting

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless required as part of reasonable adjustments. Prior knowledge and consent of all parties attending will be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

At the review panel meeting, the complainant and representatives from the school, 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 panel hearing and be accompanied if they wish, this cannot be legal representation.

Representatives from the media are not permitted to attend.

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 panel, the complainant and the school representative(s) will be given the chance to ask and reply to questions. Once the complainant and school representative(s) have presented their cases, they will be asked to leave and evidence will then be considered.

The panel will then put together its findings and recommendations from the case. The 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 trustees, Chief Executive and Headteacher.

The outcome

The committee can:

- Uphold the complaint, in whole or in part
- Dismiss the complaint, in whole or in part

If the complaint is upheld, the committee will:

- Decide the appropriate action to resolve the complaint
- Where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future

The school will inform those involved of the decision in writing within 15 school days.

7. Complaints against the headteacher.

7.1 Stage 1: informal

Complaints made against the headteacher should be directed to the Chief Executive in the first instance.

The Chief Executive will then carry out the steps at stage 1 set out in section 6 above.

If the complaint is not resolved informally, it will be escalated to a formal complaint.

7.2 Stage 2: formal

Complaints that involve or are about the headteacher should be addressed to the chair of trustees.

Formal complaints can be raised:

- By letter or email
- Over the phone
- In person

If the complaint is about the headteacher, a suitably skilled and impartial trustee will then carry out the steps at stage 2 set out in section 6 above.

The written conclusion of this investigation will be sent to the complainant within 15 school days.

If the complainant wishes to proceed to the next stage of the procedure, they should inform the chair of trustees in writing within 10 school days. Requests received outside of this timeframe will be considered in exceptional circumstances.

The chair of trustees will acknowledge receipt of the request within 5 school days.

7.3 Stage 3: review panel

If the complaint is about the headteacher the steps outlined in stage 3 of section 6 above will be followed.

8. Referring complaints on completion of the school's procedure

The decision of the panel will be final, and the completion of stage 3 represents the conclusion of the school's complaints procedure.

If the complainant is unsatisfied with the outcome of the school's complaints procedure and the complaint is regarding the school not meeting standards set by the DfE in any of the following areas, the complainant can refer their complaint to the DfE:

- Education
- Pupil welfare and health and safety
- School premises

- Staff suitability
- Making information available to parents
- The spiritual, moral, social or cultural development of pupils

The DfE will consider reports of a major failure to meet the standards. Where appropriate, it can arrange an emergency inspection to look at pupil welfare and health and safety, and make sure that the school deals with serious failings.

9. Unreasonable and persistent complaints

9.1 Unreasonable complaints

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

- 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 co-operate with the complaints investigation process
- Refuses to accept that certain issues are not within the scope of the complaints procedure
- Insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice
- Introduces trivial or irrelevant information which they expect to be taken into account and commented on
- 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 complaint procedure has been fully and properly implemented and completed
- Seeks an unrealistic outcome
- Makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
- Uses threats to intimidate
- Uses abusive, offensive or discriminatory language or violence
- Knowingly provides falsified information
- Publishes unacceptable information on social media or other public forums

Please note: the above list is not intended to be exhaustive and is for guidance purposes only. It is at the discretion of the school what is deemed to be unreasonable.

Complainants should try to limit their communication with the school while the 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.

Steps we will take

We will take every reasonable step to address the complainant's comments, 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.

Whenever possible, the headteacher, Chief Executive or chair of trustees will discuss any concerns with the complainant informally before applying an 'unreasonable' marking. If the behaviour continues, the headteacher will write to the complainant explaining that their behaviour is unreasonable, refer them to this policy and remind them to act in accordance with it. For complainants who excessively contact the school causing a significant level of disruption, 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
- Put any other strategy in place as necessary

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from school premises and ensuring appropriate measures of support are provided to staff where they are the subject of aggression and/or violence.

9.2 Serial/persistent complaints

If the complainant contacts the school again on the same issue, the correspondence may then be viewed as 'serial' or 'persistent'. We may stop responding to the complainant when the following conditions are met:

- We have taken every reasonable step to address the complainant's concerns
- The complainant has been given a clear statement of our position and their options
- The complainant contacts the school repeatedly, making substantially the same points each time

The case to stop responding is stronger if:

- The complainant's communications are often or always abusive or aggressive
- The complainant makes insulting personal comments about or threats towards staff
- We have reason to believe the individual is contacting the school with the intention of causing disruption or inconvenience

Where we decide to stop responding, we will inform the individual that we intend to do so. We will also explain that we will consider any new complaints they make provided the concerns raised are materially different to those raised previously and/or are unconnected to the previous concern

9.3 Duplicate complaints

If we have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, we will assess whether there are aspects that we hadn't previously considered, or any new information we need to take into account.

If we are satisfied that there are no new aspects, we will:

- Tell the new complainant that we have already investigated and responded to this issue, and that the local process is complete

If a duplicate complaint is raised which in the view of the school warrants further consideration, the procedure outlined in section 6 or 7 (as appropriate) will be repeated.

9.4 Complaint campaigns

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

- Publishing a single response on the school website
- Sending a template response to all of the complainants

If complainants are not satisfied with the school's response, or wish to pursue the complaint further, the normal procedures will apply.

10. Record keeping and confidentiality

The school 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 and stored securely, 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 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 records management policy.

11. Recommendations and Deliverables

The lead investigator will use the Complaints Action document to capture the action and monitor the progress towards the deadlines. Where required, the progress should be communicated to the complainant. See Appendix one

12. Learning lessons

The Chief Executive and Chair of Trustees will review any underlying issues raised by complaints with the Headteacher and School Management team where appropriate, and respecting confidentiality, to determine whether there are any improvements that the school can make to its procedures or practice to help prevent similar events in the future.

13. Monitoring arrangements

The Chief Executive will monitor the effectiveness of the complaints procedure in making sure that complaints are handled properly.

The complaints records are logged and managed by the Headteacher personal assistant.

This policy will be reviewed by the headteacher every academic year and the policy will be approved by the Chief Executive.

13. Links with other policies

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Staff grievance procedures
- Staff disciplinary procedures
- Privacy notices

Appendix One

The lead investigator will project manage the completion of the actions and the communications back to the complainant.

Action will be delegated when submitting the report to the parents.

Deadlines are set as part of the reporting processes.

Recommendations should be feasibility tested and confirmed by the leadership team before being submitted to the complainant.

Feedback will only have actions, where themes are occurring and will be highlight and managed as part of the leadership team meeting.

Type	Guardian name	Date submitted	Stage of Complaint	Staff Name (liaison)	Deliverables team
Choose an item.			Choose an item.		
Recommendation	Due date	Owner	Status	Notes	Confirmation date

