

Complaints Policy

Reviewed by CEO

Approved by: Headteacher

Review Date September 2027

Version 2	updated 21/5/2026	Data protection complaint addition.	Caroline Bennett
Version 3	updated 05/08/2026	Integration of ICO and Charity governance throughout. Related Policies added to cover sheet Owner and review added to coversheet added.	Caroline Bennett

1. Relevant Policies

- Therapy Complaints Policy
- Safeguarding Policy
- Staff Conduct Policy
- Data Protection Policy
- Admissions Policy

2. Table of Contents

1.	Relevant Policies.....	1
3.	Introduction	3
4.	Scope.....	3
5.	Definitions	4
6.	Aims	4
7.	Concerns & Complaints Stages.....	5
8.	Complaints About the Headteacher	8
9.	Complaints About the Chief Executive and the Board	8
10.	Complaints about data protection and usage.....	9
11.	Timescales.....	9
12.	Roles and Responsibilities	10
13.	Referring Complaints on Completion of the School's Procedure	10
14.	Unreasonable and Persistent Complaints	11
15.	Record Keeping and Confidentiality	14
16.	Monitoring and Learning	14
17.	Appendix 1 – Complaints Action Log	15
18.	Appendix 2 – Staff Guide & Support: Trauma-Informed Complaints Handling.....	16

3. Introduction

This policy sets out the pathways for managing feedback, concerns and complaints. These three elements help us listen to families and students, learn from their experiences, and continually improve our practice. We recognise that sharing feedback or making a complaint can feel stressful, so our process is designed to be clear, safe, and respectful.

This policy applies to complaints relating to the delivery of education and the operation of Pace School, including teaching, learning, behaviour, pastoral care, school leadership, and school administration.

Where the primary subject of the complaint relates to the assessment, planning or delivery of therapy, clinical decision-making, or the professional practice of a therapist, the complaint will be managed under the Therapy Services Complaints Policy, regardless of where the therapy was delivered.

4. Scope

This policy has been developed to meet the requirements of the Education (Independent School Standards) Regulations 2014, including the Independent School Standards. It reflects statutory guidance issued by the Department for Education and is underpinned by the Equality Act 2010, the UK GDPR and Data Protection Act 2018. As a registered charity, Pace is committed to the principles of good governance and accountability promoted by the Charity Commission. Where complaints relate to the processing of personal data, complainants also have the rights set out under UK data protection legislation and may refer concerns to the Information Commissioner's Office (ICO).

The policy sets out the stages, timelines and roles & responsibilities involved in our feedback, concerns and complaints process as well as articulating our policy aims and principles.

The following areas are not covered by this procedure:

- Admissions (see Admissions Policy)
- Safeguarding
- Whistleblowing
- Staff grievances/discipline (see separate policies)
- Clinical incidents and professional capability procedures.

5. Definitions

Feedback

General impressions or ideas about your experiences at school.

Can be shared at any time (email, surveys, voice forums, face-to-face).

We acknowledge and record your feedback.

Used to celebrate strengths and guide improvements.

Concern

A specific issue or worry that you would like us to look into.

Raised within **90 days** of the issue.

Response within **Stage 1 timeline** of our complaints process.

Focus on early resolution, restorative approaches, and avoiding escalation where possible.

Complaint

An informal or formal expression of dissatisfaction about a particular aspect of the school.

We will triage the complaints formally unless otherwise stated by the complainant.

Raised within **90 days** of the issue.

Response depends on the complaint stage as set out below.

School days

This means days on which the school is open to pupils during term time including inset days.

6. Aims

Our school is committed to responding to complaints with openness, honesty and a commitment to learning. We aim to meet our statutory and regulatory responsibilities while responding in ways that minimise distress, build trust, promote positive relationships and uphold our values: Child & Family Centred, Innovative, Specialist, Dedicated, Compassionate, and Aspirational.

When responding to complaints, we will:

- Encourage resolution of concerns through informal approaches wherever possible
- Ensure complainants have the opportunity to complete the full process if appropriate
- Address all points raised and provide clear, timely, and effective responses
- Facilitate a thorough and transparent investigation
- Be impartial, fair, and non-adversarial, ensuring that all parties feel heard
- Respect confidentiality, while explaining any limits in advance
- Treat all complainants with courtesy and respect
- Keep complainants informed at each stage with clear and accessible communication

- Make reasonable adjustments so that all participants can engage fully
- Use complaints as opportunities for learning and improvement
- Publicise this policy in accessible formats

7. Concerns & Complaints Stages

Communications will be assessed at the point of receipt to determine whether they are categorised as feedback, concerns, informal or formal complaints. The following process will then be followed:

Feedback – Acknowledged and recorded. No further formal action taken.

Concerns & Complaints

- **Stage 1 – Informal resolution** (*Concerns managed within this stage only*)
- **Stage 2 – Formal investigation**
- **Stage 3 – Review panel** (*if required*)

Stage 1: Informal Resolution

Our school takes concerns and informal complaints seriously and will make every effort to resolve issues quickly and constructively.

- The complainant must raise the matter within **90 days** of its occurrence
- The matter must be raised with the relevant senior manager (Headteacher, Deputy Headteachers, Senior Therapists), in person, by phone, letter, or email
- The school will acknowledge concerns / informal complaints within **5 school days**, confirming how we intend to proceed and the anticipated timescale
- If required, a meeting between the complainant and a member of the Senior Management Team will normally take place within **20 school days**
- A written response will be provided within **10 school days** of this meeting

Maximum timeline for Stage 1: 35 school days.

Escalation to Stage 2:

- If the complainant is not satisfied with the outcome, they may choose to escalate it to Stage 2
- Requests must be made in writing to the Headteacher (or delegated investigator) within **10 school days** of receiving the Stage 1 outcome and include the basis for escalation
- The Headteacher (or designated investigator) will acknowledge receipt within **5 school days**

Stage 2: Formal Investigation

The formal stage provides a structured and impartial process for resolving more significant concerns.

Formal complaints must be submitted to the Headteacher (or delegated investigator) in writing within 90 days of the incident or within 10 school days of the Stage 1 outcome, whichever is later.

Where the complaint relates to personal data, confidentiality, privacy, information sharing, subject access requests, or other data protection matters, complainants are encouraged to raise concerns as soon as reasonably possible after becoming aware of the issue.

Complainants should provide (where not already shared during Stage 1):

- relevant details, including dates, times, names of witnesses, and supporting documents where available;
- details of the outcome or resolution sought.

The Headteacher will record the date the complaint is received and acknowledge receipt in writing within 5 school days.

An investigation will be carried out sensitively, fairly, and proportionately. All relevant parties will be given an opportunity to be heard.

A written outcome will normally be provided within 30 school days.

The maximum timeline for Stage 2 complaints is normally 35 school days, unless there are exceptional circumstances requiring a longer investigation. In such cases, the complainant will be kept informed of revised timescales.

Maximum timeline for Stage 2: 35 school days.

Escalation to Stage 3:

- If the complainant is not satisfied with the outcome, they may request an escalation to Stage 3
- Requests must be made in writing to the Chief Executive within **10 school days** of receiving the Stage 2 outcome, with a rationale justifying the escalation
- The Chief Executive will acknowledge receipt within **5 school days**

Stage 3: Review Panel

The panel review stage ensures an independent review of both the complaint and the handling of the issue in previous stages, to ensure compliance with the policy and fair outcomes.

Convening the Panel

- The panel will be appointed by the **Chair of Trustees**
- The panel will include at least **three members** who were not directly involved in the initial complaint
- At least **one panel member will be independent** of the school's management.
- The panel will have access to all records from earlier stages
- The complainant will receive reasonable notice of the hearing date, usually within **60 school days** of their request
- Each party will have at least **10 school days** to prepare and submit evidence or questions
- All evidence must be submitted by the deadline given

During the Panel Hearing

- The complainant may bring a supporter or representative
- The hearing will be private and respectful
- Recording will only take place with the prior consent of all parties, and recordings will be deleted after **6 months**
- Both the complainant and school representatives will have the opportunity to share their perspective and evidence
- Witnesses may be invited if appropriate
- Witnesses or supporting representatives cannot be legal representatives or members of the media

The Outcome

- The panel will review all evidence and make findings and recommendations
- Possible outcomes:
 - The complaint is upheld
 - The complaint is partially upheld
 - The complaint is not upheld
- If partially or wholly upheld, the panel will decide on appropriate actions / recommendations
- The outcome will be shared in writing with the complainant, staff with a legitimate need to know, trustees, the Chief Executive, and Headteacher within **15 school days** of the hearing
- The panel decision represents the final stage of the school's internal complaints procedure..

Maximum timeline for Stage 3: 75 school days.

8.Complaints About the Headteacher

The process and timeline are the same as Section 5 with the following exceptions:

Stage 1: Informal resolution

- Directed to the **Chief Executive**

Stage 2: Formal resolution

- Directed to the **Chair of the Education Subcommittee**
- An impartial trustee will carry out the Stage 2 process

Stage 3: Review Panel

- Directed to the Chair of Trustees

9.Complaints About the Chief Executive and the Board

The process and timeline are the same as Section 5 with the following exceptions:

Stage 1: Informal resolution

- Directed to the **Chair of the Finance and Operations Subcommittee**

Stage 2: Formal resolution

- Directed to the **Deputy Chair of Trustees**
-

Stage 3: Review Panel

- Directed to the **Chair of Trustees**

Where a named board member is involved, another subcommittee chair substitutes.

The listing of each committee is on [Page Trustees](#).

10. Complaints about data protection and usage.

Complaints relating to personal data, confidentiality, privacy, information sharing, subject access requests, retention of records, photographs/video, or how the school processes personal information may be raised through this complaints procedure or directly with the school's Data Protection Lead via email, telephone, or the online complaints form.

Complaints about data will be handled in line with Stage 2 complaints procedure and in accordance with applicable UK data protection legislation, including the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

Individuals have the right to raise concerns with the Information Commissioner's Office (ICO) if they remain dissatisfied with how their personal data has been handled.

You can access our Privacy notices, data protection, data retention and data breach policy online: [Pace Policies and information – Pace](#)

How to make a data protection complaint to Pace

Email: Dataprotection@thepacecentre.org

Call: 01296 614287

Online – footer menu of the home page

11. Timescales

Complaints must adhere to the timescales above to ensure timely resolution and to make it easier to gather accurate information.

- If there are exceptional circumstances (e.g., health needs, personal challenges, or other vulnerabilities) we will consider these with sensitivity and use our discretion in deciding how to proceed
- When complaints are made during school holidays, they will be recorded as received on the first school day after the holiday period

If at any point we are unable to meet the timescales set out in this policy, we will:

- Contact the complainant promptly to explain the reason for the delay
- Agree on new timeframes in partnership with the complainant

12. Roles and Responsibilities

The Complainant

We are committed to ensuring that complainants are heard clearly and fairly. The process is most effective when complainants:

- Follow the procedures set out above
 - Allow each concern or complaint to be completed before raising unrelated or additional issues
 - Respond in a timely manner to communication and deadlines
 - Ask for assistance if required (for example, translation, advocacy, or accessibility support)
 - Treat all those involved with respect
- Avoid publishing confidential or personal information relating to children, families or staff while a complaint is being investigated

The Investigator

An investigator will be appointed to help establish the facts.

The investigator will:

- Act with fairness, sensitivity, and respect
- Meet with relevant individuals making adjustments as needed (e.g., offering breaks, inviting a supporter to attend)
- Take notes of interviews and discussions and review evidence
- Prepare reports
- Track recommendations and progress using the Complaints Action Log Document (Appendix 1) which is reviewed at each Board meeting
- Share updates with the complainant where appropriate

The Complaints Co-ordinator

- The complaints co-ordinator may be any staff member providing administrative support to the process. They will keep the complainant informed
- Help the process run smoothly by liaising with relevant parties
- Share third-party information appropriately and safely
- Arrange additional support for the complainant if required (e.g., interpreter, advocate, or accessibility adjustments)

13. Referring Complaints on Completion of the School's Procedure

Following completion of the school's internal complaints procedure, complainants may refer concerns to the appropriate external organisation, depending on the nature of the

complaint. The relevant organisation will decide whether the matter falls within its remit and what action, if any, it will take.

Department for Education (DfE)

Where a complaint relates to a potential failure to meet the **Education (Independent School Standards) Regulations 2014**, the Department for Education may consider whether regulatory action is required. Where appropriate, this may include requesting further information or commissioning an inspection.

Information Commissioner's Office (ICO)

Where a complaint relates to the processing of personal data, privacy, confidentiality, or information rights, the ICO may investigate whether the school has complied with its obligations under UK data protection legislation.

Charity Commission

Where concerns relate to the governance of the charity, trustee conduct, or the administration of charitable resources, the Charity Commission may consider whether regulatory intervention is appropriate.

Health and Care Professions Council (HCPC)

Where concerns relate to the fitness to practise of an HCPC-registered professional, the matter may be referred to the HCPC. Complaints relating primarily to clinical practice should be managed in accordance with the **Therapy Services Complaints Policy**. The HCPC will determine whether the concerns meet the threshold for a fitness to practise investigation.

The timescales and procedures of external regulators are independent of Pace and vary according to the organisation and the nature of the concerns.

14. Unreasonable and Persistent Complaints

The school has a responsibility to ensure that complaints are managed in a way that is fair, proportionate, and sustainable, and that staff and other families are protected from harm, intimidation, or undue disruption.

Examples of behaviour that may be considered unreasonable include:

- Refusing to explain the complaint, its grounds, or the desired outcomes, even when support is offered to help clarify
- Refusing to engage with the complaints process or cooperate with reasonable requests for information

- Insisting on outcomes that are not possible under the law, school policy, or best practice
- Repeatedly changing the focus of the complaint or raising new, unrelated issues while the process is ongoing
- Making excessive or unrealistic demands on staff time, such as frequent, lengthy, or complicated contact by phone, email, or in person
- Using threatening, abusive, or discriminatory language, or attempting to intimidate staff
- Knowingly providing false or misleading information
- Publishing unacceptable or damaging information about staff or the school on social media or other public forums

This list is not exhaustive but provides examples of behaviour that may be considered unreasonable.

12.1.1 Serial or persistent complaints

If a complainant continues to contact the school about the same issue after it has been fully addressed through the complaint's procedure, their correspondence may be considered serial or persistent

The school may stop responding when:

- Every reasonable step has been taken to address the concerns
- The complainant has received a clear explanation of the school's position and next steps
- The complainant continues to raise the same issue without presenting new evidence or material information

The case to stop responding is stronger if:

- Communications are abusive, aggressive, or contain personal insults or threats
- The contact appears intended to cause disruption rather than to seek resolution

If the school decides to stop responding, the complainant will be informed in writing. The school will continue to consider any new or significantly different concerns raised in the future.

12.1.2 Duplicate complaints

If the school has already resolved a complaint and receives a duplicate complaint about the same issue from another family member, partner, or individual, we will review whether there are new elements to consider.

- If no new information is provided, the new complainant will be informed that the matter has already been investigated and concluded
- If new, relevant issues are raised, the school will re-open the procedure at the appropriate stage

12.1.3 Evolving complaints

Sometimes, complainants introduce new issues while a complaint is ongoing. In these cases:

- The school will break down the communication and align the new issues with the correct stage of the complaints process
- The complainant will be asked to confirm in writing that they are happy with the proposed approach within **10 school days**
- If no confirmation or clarification is provided, the school may close that strand of the complaint

12.2 Complaint campaigns

If the school receives a large volume of complaints on the same subject, particularly from individuals not directly connected with the school, we may respond by:

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

Where individuals remain dissatisfied or wish to pursue a complaint further, the standard complaints procedure will continue to apply.

12.3 How we respond

The Headteacher, Chief Executive, or Chair of Trustees will always attempt to discuss concerns with the complainant informally before classifying behaviour as “unreasonable.”

If behaviour continues, the complainant will receive written notification explaining the concerns, referencing this policy, and reminding them of the Parents' Code of Conduct.

Where contact is causing significant disruption, the school may:

- Assign a single point of contact for all communication
- Limit the frequency or method of communication (e.g., a set number of emails per term)
- Put other proportionate strategies in place to safeguard staff and ensure the process continues fairly

In cases of serious aggression or violence, the school will immediately involve the police. Staff affected will be offered appropriate support, and protective measures may include barring individuals from school premises.

15. Record Keeping and Confidentiality

We are committed to handling all records with the utmost care to protect the dignity and privacy of everyone involved.

- We will keep accurate records of the progress of all complaints, including actions taken at each stage, the stage at which the complaint was resolved, and the final outcome
- Records may include copies of letters and emails, and notes from meetings or phone calls
- All records will be stored securely, treated as confidential, and accessed only by those directly involved in investigating the complaint or serving on a review panel

Exceptions apply only where:

- the Department for Education, the Secretary of State, or their representatives request access
- A complainant makes a lawful request under the Freedom of Information Act or a Subject Access Request under data protection law
- The information is required during a school inspection

Records will be retained only for as long as necessary, in line with data protection law, the school's privacy notices, and our records management policy. After this, they will be securely destroyed.

16. Monitoring and Learning

The Chief Executive will monitor the implementation and effectiveness of this procedure.

We value feedback, concerns and complaints as an opportunity for reflection and growth. The Chief Executive will review any matters raised with the Headteacher and School Management Team, while respecting confidentiality.

The Chief Executive will provide anonymised complaints trends, themes and organisational learning to the Board of Trustees annually, or more frequently where significant risks or recurring themes are identified.

Complaints trends may also be considered alongside safeguarding, attendance, behaviour, and quality assurance information to identify wider themes and opportunities for organisational learning.

17. Appendix 1 – Complaints Action Log

The **lead investigator** will complete the action log, delegate actions to colleagues, and project manage the completion of the actions.

The **complaint coordinator** will communicate progress to the complainant and share deliverables with them where appropriate.

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 reoccurring themes are found. These actions will be 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

18. Appendix 2 – Staff Guide & Support: Trauma-Informed Complaints Handling

This guide below is to support staff when receiving or responding to a complaint. It helps ensure the process is fair, safe, and trauma-informed for everyone involved.

1. Safety and Calm

Create a safe, welcoming environment for conversations (e.g., private, quiet, non-threatening space).

Speak calmly and clearly, avoiding jargon or legalistic language.

If emotions run high, allow breaks and reassure all parties that the process will continue fairly.

2. Trust and Transparency

Explain the complaints process clearly from the start, including what will happen next and expected timelines.

Be honest about what you can and cannot do.

Keep the complainant updated regularly, even if there is “no new news.”

3. Voice and Choice

Actively listen without interrupting; allow the complainant to tell their story in their own words.

Offer choices where possible (e.g., meeting format, written vs verbal responses).

Ask about any adjustments that might help them feel comfortable (e.g., having a supporter present).

4. Respect and Dignity

Treat all parties (complainant, child, staff) with courtesy, patience, and compassion.

Avoid defensive or adversarial responses.

Acknowledge the feelings behind the complaint, even if the facts are disputed.

5. Fairness and Equity

Ensure investigations are impartial and thorough.

Give equal opportunity for all voices to be heard.

Recognise and respond to additional needs (e.g., language support, accessibility).

6. Staff Wellbeing

Remember that receiving a complaint can feel personal and stressful. Seek support when needed.

Use reflective supervision or peer discussion to process difficult cases.

Maintain boundaries: focus on the issue, not personal blame.

7. Learning and Growth

Record outcomes and identify any patterns or lessons for school improvement.

Share learning in a way that strengthens practice, not blame.

Celebrate when complaints are resolved constructively, as this builds trust with families.

8. Quick Reminder Summary:

Stay calm, fair, and compassionate.

Keep communication clear and consistent.

Prioritise dignity, safety, and respect for all involved.