Complaints Procedure

St Edward's Cheltenham

Document control

Field	Details
School	St Edward's Cheltenham
Policy owner	Anna Sandford-Squires, Headteacher
Approved by	Proprietor, Mr A. Khan
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Contents

1. Purpose, status and scope
2. Legal and regulatory framework
3. Definitions
4. Principles and accessibility
5. Matters covered and matters handled elsewhere
6. Safeguarding, allegations, urgent risk and external referral
7. Reasonable adjustments, language and representation
8. Time limits and working days
9. Overview of the three-stage procedure
10. Stage 1: informal resolution
11. Stage 2: formal written complaint
12. Formal investigation
13. Stage 2 decision and remedies
14. Stage 3: requesting a panel hearing
15. Panel composition and independence
16. Preparing for the panel hearing
17. Conduct of the panel hearing
18. Panel findings, recommendations and outcome
19. Complaints about the Headteacher, proprietor or governance
20. Data protection complaints
21. EYFS complaints
22. Boarding and pupil complaints
23. Separated parents and parental responsibility
24. Anonymous, withdrawn, duplicate and collective complaints
25. Unreasonable or persistent complaint conduct
26. Confidentiality, information sharing and records
27. Complaints register and annual publication
28. External routes
29. Monitoring, learning and proprietor oversight
30. Policies to be read in conjunction
31. Source register

1. Purpose, status and scope

This procedure explains how the school will handle concerns and complaints fairly, promptly and consistently. It is intended to resolve issues as close to their source as possible, while providing a formal investigation and an independent panel stage where necessary.

- The statutory Independent School Standards route applies to complaints by parents of current pupils.
- Complaints made by parents of former pupils will be dealt with under this Complaints Procedure only where the complaint was initially raised while the pupil to whom the complaint relates was still registered at the School.
- Pupils may raise concerns directly under the pupil route in section 23. A parent may also make a complaint on a pupil's behalf.
- Nothing in this procedure prevents immediate contact with the DSL, children's social care, the LADO, police, DfE, the relevant inspectorate (ISI or Ofsted, as applicable), the ICO or another competent authority where there is a legitimate safeguarding, regulatory or legal reason.

The procedure and the number of complaints registered under the formal procedure during the preceding school year will be made available to parents of current and prospective pupils. Although prospective parents may access this information, the statutory complaints procedure does not apply to complaints relating to prospective pupils or unsuccessful admissions; such matters will be considered under the Admissions and Exclusions Policy or another applicable School route.

The proprietor will ensure that this procedure is effectively implemented in practice. Complaints will be handled within clear timescales, records will be maintained appropriately, conflicts of interest will be identified, and decision-makers and panel members will have the independence required for the stage they are undertaking. Learning and agreed actions arising from complaints will be followed through.

2. Legal and regulatory framework

Authority	Application
Education (Independent School Standards) Regulations 2014, Schedule paragraphs 32 and 33	Requires availability of the procedure and annual formal-complaint number; a written and effectively implemented three-stage process; an independent panel member; findings, recommendations, records and confidentiality.
Independent School Standards Guidance, April 2026	Explains the scope of Part 7, panel independence, attendance rights, records, data protection complaints and inspection expectations.
Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026	Requires immediate safeguarding action, appropriate information sharing and correct handling of allegations or concerns about adults and child-on-child abuse.
EYFS statutory framework for group and school-based providers, September 2026	Requires investigation of written EYFS complaints, outcome within 28 days, a record available to Ofsted and publication of Ofsted contact details.
Boarding schools: National Minimum Standards, May 2026	Requires an effective parental complaints policy, an accessible boarder complaint route, records identifying boarding complaints and pattern review.
Data Protection Act 2018 section 164A and Data (Use and Access) Act 2025	From 19 June 2026, requires a route for data protection complaints, acknowledgement within 30 days, appropriate investigation without undue delay and prompt outcome communication.
Equality Act 2010 and Human Rights Act 1998	Requires non-discrimination, reasonable adjustments, dignity, privacy and fair, proportionate treatment.
Education Act 1996 section 576	Defines parent to include a person with parental responsibility or care of the child.

3. Definitions

Term	Meaning in this procedure
Concern	A worry, question or expression of dissatisfaction that may be resolved informally without invoking the formal procedure.
Complaint	An expression of dissatisfaction about an action, omission, decision, service or standard for which the school is responsible and which the complainant wishes the school to address.
Formal complaint	A complaint submitted at Stage 2 in writing, or recorded in writing by the school as a reasonable adjustment and approved by the complainant.
Parent	A parent, carer, person with parental responsibility or person who has care of the pupil, as appropriate.
Pupil	A person registered at the school. For safeguarding purposes, a child is anyone under 18.

Term	Meaning in this procedure
Working day	A weekday during the school term when teaching staff are expected to work, excluding bank holidays and school closure days, unless a different statutory calendar-day rule applies.
Panel	At least three people appointed by or on behalf of the proprietor, none directly involved in the matters complained of, including one person independent of the management and running of the school.
Independent panel member	A person outside the school workforce and proprietor or governing body who is not otherwise involved in managing the school and has no relationship that could reasonably call impartiality into question.
Outcome	The decision on whether a complaint is upheld, partly upheld or not upheld, with findings, reasons and any appropriate remedy or recommendation.
Representative or companion	A person attending to support the parent. The right to be accompanied does not automatically create a right to legal advocacy at the hearing.

4. Principles and accessibility

The purpose of this procedure is to establish what happened, determine whether the School's standards, policies or duties were met, provide an appropriate remedy where necessary and identify learning or improvement. It is not a judicial process and does not determine criminal liability, professional misconduct or civil damages.

- Concerns will be listened to respectfully and handled without defensiveness, retaliation or avoidable formality.
- The school will be impartial, identify conflicts of interest and use decision-makers who have not prejudged the matter.
- The process will be child-centred. A complaint about adult service or communication will not displace immediate action needed to protect a pupil.
- The complainant will be told what stage is operating, who is handling it, the expected timescale and the next route if dissatisfied.
- The person complained about will be treated fairly, told the substance of relevant allegations and given a reasonable opportunity to respond, subject to safeguarding or legal constraints.
- The school will explain outcomes clearly while protecting confidential information about pupils, staff and third parties.
- No pupil or parent will be disadvantaged because a concern or complaint is raised in good faith.

5. Matters covered and matters handled elsewhere

The school will identify the correct route when a communication raises several issues. Mixed complaints may be separated and handled in parallel, with the complainant told how each element will proceed.

Matter	Primary route
Education, pastoral care, communication, school services, implementation of policy or staff conduct not amounting to a safeguarding allegation	This Complaints Procedure.
Admission refusal, waiting list, scholarship or bursary decision	Admissions and Exclusions Policy and any published review route.
Suspension, permanent exclusion or required removal	Admissions and Exclusions Policy, parent contract and stated review route.
Safeguarding concern, child-on-child abuse or allegation against an adult	Safeguarding and Child Protection Policy, LADO and agency procedures; complaint handling may resume when safe.
Employee grievance, disciplinary matter or whistleblowing	Relevant staff procedure. A parent cannot require disclosure of confidential employment action.
Data protection complaint	Section 21 and Data Protection Policy; the section 164A timetable applies.
Pupil complaint about boarding	Section 23 and boarding complaint route, with safeguarding action where relevant.
Fee, notice, debt or contractual dispute	This procedure may address service concerns, but contractual remedies, debt processes, mediation or legal advice may also apply.
Complaint about inspection or inspectorate	The relevant inspectorate complaint procedure, not the school procedure.

6. Safeguarding, allegations, urgent risk and external referral

Any information suggesting that a child may be at risk of harm, an adult may pose a risk, a crime may have occurred or urgent protection is required must be passed to the DSL immediately. Staff must not wait for a complaint stage or attempt informal resolution first.

The DSL will decide whether a concern about a child requires referral to children's social care or the police and will advise on safeguarding records, information sharing and any immediate protective action required.

Any safeguarding concern or allegation about an adult working in or on behalf of the School that may meet the harm threshold will be referred immediately to the Headteacher as case manager. Where the concern or allegation relates to the Headteacher, it will be referred to the Proprietor/Chair or other authorised person identified in the Safeguarding and Child Protection Policy. The case manager will follow KCSIE 2026 and the relevant local LADO procedures, including consultation or referral to the LADO as required before any substantive internal investigation. Where the normal internal reporting route cannot safely be used because of a conflict of interest, including where the Headteacher is also the sole proprietor, the concern or allegation will be reported directly to the LADO.

A concern about an adult working in or on behalf of the School that does not meet the harm threshold will be managed under the School's low-level-concerns arrangements in the Safeguarding and Child Protection Policy. A low-level concern will not automatically be referred to the LADO, although LADO advice or referral will be sought where there is uncertainty about whether the harm threshold may be met. The complainant will be told only information that can lawfully and safely be shared.

A complaint investigation must not obstruct, duplicate or contaminate a safeguarding, police, regulatory or employment investigation.

The School may pause all or part of the complaint process while an external investigation proceeds, but will explain the reason, preserve records and review the pause regularly.

Where possible, non-prejudicial issues such as communication, support or immediate welfare arrangements will continue to be addressed

7. Reasonable adjustments, language and representation

- The school will make reasonable adjustments for disability and consider communication, literacy, language, sensory, cultural and neurodiversity needs.
- A complaint that must be made in writing may be dictated to an appropriate staff member or submitted in an accessible format. The school will record it accurately and ask the complainant to confirm the record.
- Interpretation, translated information, large print, remote attendance, rest breaks, accessible rooms or another suitable adjustment will be considered.
- A parent may be supported at a panel hearing by one companion, such as a relative, teacher or friend. Legal representation is not ordinarily appropriate and a lawyer may attend only with the school's advance agreement or where required as a reasonable adjustment or for another compelling fairness reason.
- The school may ask for evidence that a person is authorised to complain or receive information on another person's behalf.
- Requests for reasonable adjustments or communication support may be made through the complaint contact for the relevant stage.

8. Time limits and working days

The School will manage complaints promptly and within the timescales set out in this procedure. Complaints should normally be raised as soon as reasonably practicable so that relevant information remains available. A rigid time bar will not be applied where there is good reason for delay, particularly where safeguarding, disability, illness, bereavement or delayed discovery is relevant. Where a normal deadline cannot be met, the School will inform the complainant before it expires, explain the reason and provide a revised date. Urgent safeguarding, EYFS and data-protection requirements continue to apply independently of ordinary school working-day timescales.

- Stage 1 response: normally within 10 working days.
- Stage 2 acknowledgement: within 3 working days; a meeting or substantive discussion will normally be offered within 5 working days; written outcome normally within 15 working days. Alpha Schools aims to complete Stages 1 and 2 within 20 working days.
- Stage 3 request: within 5 working days of the Stage 2 outcome; acknowledgement within 5 working days; hearing within 20 working days of a valid request; written findings within 5 working days after the hearing.
- EYFS written complaints: outcome within 28 calendar days. Data protection complaints: acknowledgement within 30 calendar days and outcome without undue delay.
- If a deadline cannot be met, the school will write before it expires, explain the reason, identify work completed and provide a revised date. Departure from the normal term-time timescales will occur only exceptionally and the school will take reasonable steps to avoid undue delay.
- The School aims to complete Stages 1 and 2 within 20 working days. Where a normal deadline cannot be met, the complainant will be informed before it expires, with an explanation of the reason for delay, the work completed and a clear revised response date.
- A complaint received during a school holiday will be acknowledged as soon as reasonably practicable. Ordinary school-stage working-day timescales begin on the next school working day, but urgent safeguarding, EYFS and data protection duties continue under their own rules.

- Delay by the complainant may affect what can reasonably be investigated, but will not be used mechanically to avoid a serious concern.

9. Overview of the three-stage procedure

Stage	Purpose	Usual decision-maker	Usual timescale
Stage 1 - informal resolution	Clarify the concern, correct misunderstandings, solve practical issues and agree action quickly.	Tutor / Subject Teacher /Deputy Head Academic / Deputy Head Pastoral, depending on the nature of the concern	Response within 10 working days.
Stage 2 - formal written complaint	Independent-minded investigation, evidence review, formal findings, reasons and remedies.	Headteacher	Acknowledge within 3 working days; meeting or substantive discussion normally within 5 working days; outcome within 15 working days.
Stage 3 - panel hearing	Review the unresolved formal complaint, the Stage 2 investigation and outcome, the relevant evidence and the parties' representations, and make findings and recommendations.	Complaints Panel appointed by the Governors	Request within 5 working days; acknowledge within 5; hearing within 20; findings within 5 working days after the hearing.

- A parent is expected to complete each stage before moving to the next unless the school agrees that the nature of the complaint requires a different starting point.
- The school may resolve a complaint at any stage by agreement, but will still complete any required safeguarding, regulatory, record or learning action.

10. Stage 1: informal resolution

1. Raise the concern promptly with the member of staff closest to the issue, using email
2. The recipient records the date, issue, people involved, desired outcome and any immediate safety or safeguarding action.
3. The concern is acknowledged and allocated to an appropriate person who was not the subject of the concern where practicable.
4. The handler listens, obtains relevant information, considers policy and seeks a proportionate solution. A meeting may be offered.
5. The school responds within 10 working days, confirming what has been considered, the resolution or next action, and how to proceed to Stage 2 if dissatisfied.

The School will maintain a proportionate record of significant Stage 1 concerns, agreed actions and their completion. Matters indicating a safeguarding risk, equality concern, recurring pattern or wider systemic weakness will be escalated and monitored appropriately. Where the complaint relates to EYFS provision, the additional recording requirements in Section 22 apply.

SCHOOL STAGE 1 ROUTE

- Initial contact: the relevant member of staff according to the nature of the concern
- Escalation if the concern is about that person: see below
- Record system: written record of concerns and complaints, including the date received
- Senior review threshold: if unresolved within 10 working days or no satisfactory resolution is reached, proceed to Stage 2

Type of concern	Usual first contact	Escalation where unresolved or more serious
Minor day-to-day or class matter	Tutor	Deputy Head Pastoral
Subject-related academic concern	Subject Teacher	Faculty Lead
Serious general academic concern	Faculty Lead	Deputy Head Academic
Pastoral concern	Tutor	Director of Pastoral
Safeguarding concern	DSL OR DEPUTY DSL IMMEDIATELY	Safeguarding procedure and external referral where required; do not wait for the complaints stages.
Concern about the Headteacher	Chair of Governors, Ali Khan	Chair of Governors nominates the Stage 2 decision-maker; Stage 3 proceeds to the Complaints Panel

11. Stage 2: formal written complaint

A parent who remains dissatisfied after Stage 1 may submit a formal complaint to the Headteacher, or to the alternative recipient identified in section 20, using the Stage 2 Complaint Form where the school provides one.

- The complaint should identify the relevant events, people, dates, previous resolution attempts, why the Stage 1 response is unsatisfactory and the outcome sought.
- The school will not reject a complaint merely because it lacks legal language, is emotionally expressed or uses the wrong form. It may ask for clarification so the issues can be investigated fairly.
- Receipt will be acknowledged within 3 working days, with the investigator, issues in scope, expected response date and any information requested.
- The Headteacher or nominated Stage 2 decision-maker will normally meet or speak substantively with the parent within 5 working days of receiving the written complaint. If further investigation is required, the parent will then be given a clear investigation and response timetable.
- The investigator must be sufficiently impartial, have authority to obtain evidence and have no material conflict of interest or prior involvement that would undermine fairness.

FORMAL COMPLAINT CONTACT

- Email: headteacher@stedwards.co.uk
- Postal address: St Edward's, Cirencester Road, Cheltenham, GL53 8EY
- Headteacher complaint contact: Chair of Governors, Ali Khan; contact details available from the School Office on request

12. Formal investigation

6. Define the complaint issues and the decisions the investigator is required to make. Share this scope with the parent and correct material misunderstandings.
7. Secure relevant records, including correspondence, policies, logs, meeting notes, electronic records, CCTV or other material where lawful and proportionate.
8. Interview or obtain written accounts from relevant people. Pupils will be heard in an age-appropriate and trauma-informed way and will not be repeatedly questioned about safeguarding matters.
9. Give the person complained about a fair opportunity to answer relevant allegations, subject to agency, safeguarding or legal restrictions.
10. Consider consistency, reliability, corroboration, context, policy, equality, reasonable adjustments, confidentiality and the limits of the available evidence.
11. Apply the balance of probabilities to factual findings unless another specific legal or contractual test applies.
12. Keep a dated investigation record showing evidence considered, decisions, reasons, action and any unresolved limits.

13. Stage 2 decision and remedies

The written Stage 2 outcome will normally be issued within 15 working days and will include:

- the issues investigated and the procedure followed;
- findings on each material issue and sufficient reasons to understand the decision;
- whether the complaint is upheld, partly upheld or not upheld;
- action already taken or proposed, so far as confidentiality permits;
- any apology, correction, reconsideration, support, meeting, staff guidance, training, policy change, risk control or monitoring action; and
- the Stage 3 request route, recipient and deadline.
- A remedy is not an admission of legal liability. A genuine apology, explanation and practical correction should not be withheld merely because a complaint has become formal.

Where a complaint concerns another pupil or a member of staff, the complainant will be told sufficient information to understand the outcome so far as this can lawfully and fairly be disclosed. The School will not normally disclose confidential disciplinary, capability, medical, safeguarding or other personal information relating to another person. The School may nevertheless confirm that appropriate action has been taken. An apology, explanation or practical remedy will not be withheld merely because a complaint has become formal and does not, of itself, amount to an admission of legal liability.

14. Stage 3: requesting a panel hearing

- A parent dissatisfied with the Stage 2 outcome may request a panel hearing in writing within 5 working days, using the Stage 3 Panel Hearing Request Form where provided, setting out the unresolved grounds and desired outcome.
- Any supporting evidence on which the parent wishes to rely should be submitted with the request. A request for an extension must normally be made in writing before the deadline, explain the exceptional circumstances and state the additional time sought.
- Where the request is late and no extension has been agreed, the school may conclude the internal procedure and decline to progress to Stage 3, after considering safeguarding, equality, accessibility and any exceptional reason for the delay.

- The panel will consider the unresolved complaint, the Stage 2 investigation and outcome, the evidence and the parties' representations. It will make findings on the matters before it and decide whether the complaint should be upheld, partly upheld or not upheld, and whether any recommendations should be made.
- New complaints that were not raised at Stage 2 may be returned for investigation before the panel considers them, unless they are inseparable from the existing complaint or urgent fairness requires otherwise.
- The clerk will acknowledge a valid request within 5 working days and arrange the hearing to take place within 20 working days.
- A parent who chooses not to attend does not cancel the hearing. After a reasonable opportunity to participate, the panel will proceed on the written evidence.

PANEL REQUEST CONTACT

- Recipient: Chair of Governors
- Email and postal address: a.khan@alphaschools.co.uk, 19 London Road, High Wycomb, Bucks, HP11 1BJ
- Request deadline: 5 working days

15. Panel composition and independence

- The panel will consist of at least three people who were not directly involved in the matters detailed in the complaint.
- At least one member will be independent of the management and running of the school. This person will not be an employee, proprietor, governor or trustee, and will not otherwise manage the school.
- A person who regularly advises, represents or provides management services to the school, such as the school's regular solicitor or consultant, will not ordinarily be treated as the independent member.
- The chair will have suitable experience, understand the procedure, manage fairness and ensure clear findings and recommendations.
- Panel members will declare actual, potential or perceived conflicts before receiving substantive papers. The clerk will record the declaration and action taken.
- Where the complaint concerns governance or the proprietor, panel appointment will be arranged so that the person or body complained about does not control the outcome or select a conflicted panel.

16. Preparing for the panel hearing

- The clerk will propose a reasonable date, time and format and make arrangements that facilitate the parent's right to attend.
- The hearing will normally be held in person at the school or another suitable location. A video hearing may be used by agreement or as a reasonable adjustment, provided participation and confidentiality are protected.
- The parent may attend and be accompanied. The school will be told the companion's identity and role in advance.
- The clerk will circulate the complaint, Stage 2 outcome, relevant evidence and written submissions to the parties and panel normally at least 5 working days before the hearing.
- Late evidence will be accepted only where fair. The panel may adjourn if another party needs a proper opportunity to respond.
- Pupil participation will be considered carefully, taking account of age, wishes, welfare, SEND, safeguarding and whether written or indirect evidence is more appropriate.
- The school may arrange separate waiting areas, screens, staggered attendance or another safety measure. This must not prevent a fair opportunity to be heard.

17. Conduct of the panel hearing

13. The chair introduces the panel, confirms independence and conflicts, explains the purpose, procedure, confidentiality and possible outcomes.
14. The parent explains the complaint and may refer to the submitted evidence. Panel members may ask questions.
15. The school presents its response and may be questioned by the panel and, through the chair, by the parent.
16. Relevant witnesses may be heard where necessary. The chair controls questioning to protect fairness, dignity and pupils' welfare.
17. Each party may make a closing statement. The panel checks that every material issue has been addressed.
18. The parties withdraw. The panel deliberates in private, makes findings on the balance of probabilities and agrees recommendations.

- The hearing will be inquisitorial and respectful rather than adversarial. Cross-examination is not permitted unless the chair considers a limited question necessary and safe.
- A written note or minutes will be kept. The statutory document provided to the parties is the panel's findings and recommendations; minutes are not automatically disclosed and remain subject to data protection and confidentiality.

18. Panel findings, recommendations and outcome

The panel may uphold, partly uphold or not uphold the complaint and may make findings and recommendations. It may recommend that the school:

- apologises, corrects information, reconsiders a decision or completes an omitted process;
- provides support, a meeting, communication plan or other practical remedy;
- reviews policy, training, supervision, staffing, risk management, reasonable adjustments or quality assurance;
- takes an issue to the proprietor, DSL, DPO, insurer, legal adviser or external authority; or
- takes no further action where the complaint is not upheld or the existing response is sufficient.
- The panel cannot require disclosure of confidential employment information, award compensation, determine criminal guilt or override a statutory agency.

The panel will provide its findings and recommendations in writing to the complainant and, where relevant, the person complained about. The findings and recommendations will also be available for inspection on the School premises by the proprietor and Headteacher. The written outcome will normally be issued within five working days of the hearing. Where further work is genuinely necessary, the parties will be informed of the reason and given a revised date. The panel's decision marks the end of the School's internal complaints procedure.

19. Complaints about the Headteacher, proprietor or governance

Complaint concerns	Stage 1 / initial route	Stage 2 formal route	Stage 3 panel
Headteacher	Chair of Governors, Ali Khan seeks informal resolution where appropriate.	Chair of Governors nominates a person to determine the complaint investigates or appoints an investigator.	At least three uninvolved members, including one independent member; Headteacher excluded from appointment and deliberation.
Individual governor, trustee or proprietor representative	[CHAIR / OTHER UNINVOLVED GOVERNANCE LEAD].	[UNINVOLVED PROPRIETOR BODY MEMBER / EXTERNAL INVESTIGATOR].	Panel excluding the person complained about and anyone directly involved.
Chair or lead proprietor representative	[VICE-CHAIR / ALPHA SCHOOLS BOARD MEMBER / EXTERNAL PERSON].	[UNINVOLVED DIRECTOR / TRUSTEE / EXTERNAL INVESTIGATOR].	Panel appointed through the alternative route in the school profile.
Whole governing or proprietorial body, or sole proprietor	[ALPHA SCHOOLS CENTRAL CONTACT / INDEPENDENT PERSON].	Independent investigator or uninvolved corporate proprietor representative.	Externally constituted panel of at least three, including an independent member, with no complained-about person controlling the outcome.
Alpha Schools central service	[RELEVANT GROUP LEAD] with school Headteacher informed.	[UNINVOLVED GROUP DIRECTOR / PROPRIETOR NOMINEE].	Compliant panel appointed by or on behalf of the proprietor; school remains accountable for meeting the Standards.

20. Data protection complaints

The School will provide a clear and accessible route for individuals to make complaints about its handling of personal data. Receipt of a data protection complaint will be acknowledged within 30 calendar days. The School will take appropriate steps to investigate the complaint without undue delay, keep the complainant appropriately informed and communicate the outcome promptly. Where a complaint also falls within this general Complaints Procedure, the School will manage the processes so that the statutory data-protection timetable is not delayed or displaced.

- A data protection complaint includes dissatisfaction about access requests, accuracy, security, sharing, retention, transparency or another use of personal information.
- The complaint will be referred promptly to Deputy Head Operations. The school may separate the data element from wider school issues and issue its data outcome earlier where possible.
- The outcome will explain the enquiries made, conclusion, action and the right to complain to the Information Commissioner.
- A rights request, such as a subject access request, is not automatically a complaint. Where both are made, each legal timetable will be managed separately.

DATA COMPLAINT ROUTE

- Data protection complaint route: j.edwards@stedwards.co.uk
- DPO / data lead: Deputy Head Operations

21. Separated parents and parental responsibility

- The school will act in the pupil's best interests and will not become an arena for unresolved family disputes.
- A parent with parental responsibility is generally entitled to use the procedure and receive information about their own complaint, subject to court orders, safeguarding and data protection.
- The school may communicate separately with parents and will not require one parent's consent merely to receive a complaint from another who has standing to complain.
- Information about the other parent, pupil or third party will be disclosed only where lawful, necessary and proportionate.
- The school may request evidence of parental responsibility, care arrangements, court orders or authority to act where this is genuinely relevant.

22. Anonymous, withdrawn, duplicate and collective complaints

- Anonymous information will be assessed for seriousness, credibility and safeguarding relevance. The school may investigate even though it cannot provide an outcome to an unidentified complainant.
- A withdrawn formal complaint will remain recorded with the withdrawal and any action taken. Safeguarding, regulatory, employment or improvement action may continue.
- Repeated correspondence about an issue already completed will not automatically reopen the complaint. Material new evidence or a serious procedural flaw will be considered.
- Where several parents raise substantially the same issue, the school may coordinate the process, appoint representatives or issue a common response, while preserving each parent's statutory rights and confidential information.
- A petition, campaign or social-media discussion does not replace the formal procedure. The school will identify the complaint issues and authorised complainants.

23. Unreasonable or persistent complaint conduct

Most complainants act reasonably. The school may manage behaviour, rather than the substance of a complaint, where contact becomes abusive, threatening, discriminatory, knowingly false, excessively repetitive, harassing or seriously disruptive.

- Before restrictions are imposed, a senior leader will normally warn the complainant, identify the behaviour, set clear expectations and consider disability, distress, language and safeguarding circumstances.
- Proportionate measures may include a single contact person, written-only communication, scheduled contact, limits on repetition, supervised meetings or refusal to respond to matters already concluded.
- Restrictions will be authorised by PROPRIETOR, recorded, time-limited and reviewed. They will not remove the right to complete an existing statutory complaint or raise a genuinely new safeguarding concern.
- Threats, harassment, hate incidents or criminal conduct may be reported to police or addressed under site-access and staff-safety arrangements.

26. Confidentiality, information sharing and records

- Correspondence, statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or an inspection body requests access, or another lawful disclosure is necessary.
- Information may be shared where necessary to safeguard a child, comply with a court or legal duty, obtain professional advice, manage insurance or legal claims, or cooperate with a competent authority.
- Complaint files will be held securely on the school premises or on an approved school system accessible from the premises, with role-based access and an audit trail.
- The school will distinguish the complaint file from safeguarding, employment, pupil educational and data-breach records while cross-referencing them where necessary.
- Formal complaint records will be retained in accordance with the School's approved Records Retention Schedule and for longer where safeguarding, litigation, insurance, regulatory action or another legal hold requires it.
- Panel findings and recommendations will be available for inspection at the school by the proprietor and Headteacher.

27. Complaints register and annual publication

Required record	Minimum content
Formal complaints register	Reference, complainant, pupil, date received, issues, stage, handler, outcome date, whether resolved at Stage 2 or proceeded to panel, result and action taken regardless of outcome.
Panel record	Appointment and independence checks, papers, attendance, hearing note, findings, recommendations, issue date and confirmation of recipients.
Boarding complaint marker	Whether complaint relates to boarding, whether withdrawn, action taken and pattern category.
EYFS complaint record	Written EYFS issue, investigation, outcome within 28 days, action and Ofsted notification or availability.
Data complaint record	Receipt, 30-day acknowledgement, enquiries, updates, outcome and ICO signposting.
Annual formal number	Number of complaints registered under the formal procedure during the preceding school year, made available accurately to parents.

- The published number will count complaints entering Stage 2, not every informal concern or each separate allegation within one complaint, unless the school clearly states another consistent method.
- The proprietor will verify that the published figure reconciles with the secure register before publication.
- The School will make available to parents of current and prospective pupils the number of complaints registered under the formal procedure during the preceding school year. The figure will be updated annually and verified against the formal complaints register before publication. For this purpose, the School counts complaints that enter Stage 2 of this procedure, rather than informal Stage 1 concerns or each separate allegation contained within one complaint.

28. External routes

External bodies do not normally replace the school's internal process, but different bodies have different statutory roles. Contact details must be checked before publication.

External body	When relevant
Department for Education	After the school process, or sooner where serious regulatory non-compliance is alleged. DfE does not investigate or re-decide the individual merits of a private-school complaint, but may consider whether the Independent School Standards are being met and may take regulatory action.
Ofsted - registered early years provision	Where a parent believes EYFS requirements are not being met, or for matters within separately registered childcare. Ofsted may consider regulatory action.
Information Commissioner's Office	Where a person remains dissatisfied with the school's handling of a data protection complaint.
Local authority children's social care / LADO / police	Immediate safeguarding concerns, allegations about adults, risk of significant harm or suspected crime.
Independent Schools Inspectorate	ISI does not adjudicate ordinary parent complaints or alter the school's decision. Relevant information may inform inspection activity; complaints about possible non-compliance with the Independent School Standards should be directed through the current DfE route.
Local authority or funding body	Where a publicly funded pupil, EHC plan, safeguarding duty or contractual placement arrangement gives that body a relevant role.
Court, tribunal, mediator or legal adviser	Where a legal or contractual remedy is pursued. The school may take advice and manage the complaint alongside proceedings where fair and lawful.

29. Monitoring, learning and proprietor oversight

- The Headteacher and proprietor will review complaint numbers, subjects, stages, outcomes, timeliness, repeat themes, boarding and EYFS matters, equality considerations and completion of actions.
- Analysis will look beyond whether complaints were upheld. A complaint may reveal a communication, system, training, supervision, policy or cultural issue even where the central allegation is not substantiated.
- Action owners and completion dates will be recorded and followed through. Learning will be shared without unnecessary personal information.
- The proprietor will sample formal files and panel records to confirm independence, clear timescales, complete findings, statutory records, annual publication and secure retention.

- This procedure will be reviewed at least annually and sooner after a serious complaint, regulatory change, inspection finding, data-protection change or material governance change.

30. Policies to be read in conjunction

- Safeguarding and Child Protection Policy
- Admissions and Exclusions Policy
- Anti-Bullying Policy
- Behaviour and Discipline Policy
- Attendance and Punctuality Policy
- Staff Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy
- Staff Grievance and Disciplinary Procedures
- Data Protection Policy, Data Protection Privacy Notice and Records Retention Schedule
- Non-Discrimination and Inclusion Policy and Accessibility Plan
- SEND Policy
- First Aid, Health and Safety and Supporting Pupils with Medical Conditions policies
- Internet Policy and Acceptable Use Agreements
- EYFS policies and registration documents, where applicable
- Boarding policies, independent-person arrangements and National Minimum Standards procedures, where applicable
- Current parent contract and school terms and conditions

31. Source register

Source	Application
Education (Independent School Standards) Regulations 2014, Schedule paragraphs 32 and 33, as amended	Availability, three stages, panel composition, attendance, findings, records, confidentiality and annual formal-complaint information.
Independent School Standards Guidance, April 2026	Scope of parental complaints, panel independence, non-attendance, records and data-protection complaint interaction.
Keeping Children Safe in Education 2026	Safeguarding referrals, allegations, low-level concerns, child-on-child abuse, confidentiality and information sharing from 1 September 2026.
Working Together to Safeguard Children 2026	Child-centred multi-agency safeguarding and timely referral.
Boarding schools: National Minimum Standards, May 2026	Parental and boarder complaints, independent support, boarding identification, withdrawn complaints and pattern review.
Data Protection Act 2018 section 164A and Data (Use and Access) Act 2025	Data complaint route, acknowledgement within 30 days and response without undue delay from 19 June 2026.
ICO: How to deal with data protection complaints, 2026	Practical complaint identification, investigation, communication and records.
Equality Act 2010 and EHRC technical guidance for schools	Reasonable adjustments and non-discrimination.
Human Rights Act 1998	Fair process, privacy, dignity and proportionate information handling.
Education Act 1996 section 576	Meaning of parent.
GOV.UK: Complain about a private school / complain to DfE	Explains that DfE does not decide individual private-school disputes but may consider whether regulatory standards are being met.
ISI inspection framework and current inspection evidence	Inspection focus on a compliant, effectively implemented process, precise timescales, secure records and accurate annual figures.
The school's parent contract	Contractual relationship and separate review or legal routes, subject to overriding statutory duties.