Complaints Policy and Procedure

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Together we Exceed

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1. Purpose of the Policy

1.1 Exceed Academies Trust ("the Trust") is committed to delivering high-quality education and services across its schools, Exceed SCITT, and Exceed Teaching School Hub. We welcome feedback, including complaints, as part of continuous improvement.

1.2 This policy sets out a clear, fair, and transparent procedure for handling complaints, in accordance with:

- Department for Education (DfE) complaints guidance.
- The Trust's Funding Agreements.
- The Academy Trust Handbook.
- Principles of public and administrative law, including fairness, reasonableness, proportionality, and natural justice.

1.3 The Trust recognises that concerns or complaints may arise at times of upset, stress or heightened emotion, and that individuals may feel an understandable need for reassurance, explanation or prompt resolution.

It is always an individual's right to raise concerns with external bodies, including (where appropriate) Ofsted, the Department for Education (DfE), the Local Authority, the Police, Members of Parliament or local councillors. Nothing in this policy is intended to restrict or discourage the lawful exercise of those rights.

However, complainants are encouraged, wherever reasonably possible, to engage first with the school or Trust to help clarify concerns, share relevant information and explore whether a proportionate and constructive resolution can be achieved at the earliest opportunity. Experience shows that, in most cases, issues can be addressed more quickly and effectively through direct engagement with those closest to the matter.

Involving multiple external bodies at an early stage does not usually change the substance of the outcome and may, in some circumstances, extend timescales or add complexity. The Trust therefore encourages open, respectful dialogue and use of this complaints procedure as the primary route for resolving concerns wherever appropriate.

1.4 This policy ensures that complaints are handled consistently, proportionately, and lawfully, while protecting staff, governors, trustees, and the Trust from misuse of the complaints process.

1.5 This policy operates a four-stage complaints procedure. The staged structure is intended to ensure that complaints receive appropriate consideration, independence, and procedural safeguards while remaining proportionate.

Later stages do not repeat investigations, but provide increasingly independent review of how complaints have been handled and decisions reached, helping to ensure fairness, consistency, and confidence in the process.

2. Scope and Definitions

2.1 **What Is a Complaint**

A complaint is an expression of dissatisfaction, however made, about an action taken or a perceived failure to act, where the complainant seeks an explanation, remedy, or change.

2.2 **Outcome-Focused Complaints**

Complaints are a mechanism for resolving specific issues. Complainants are expected to explain, as clearly as possible, the outcome or remedy they seek. The Trust will consider whether the outcome sought is:

- lawful;
- proportionate; and
- within the Trust's powers.

Where an outcome sought is not achievable, the Trust will explain this clearly and determine the complaint on that basis.

2.3 **Matters Not Covered by This Policy**

Certain matters are governed by separate statutory, contractual, or regulatory procedures and are therefore not normally considered under this complaints policy, except in relation to the administrative handling of the matter where appropriate.

This complaints policy cannot be used to overturn statutory decisions, legal determinations, or outcomes reached through external appeal, tribunal, inspection, or court processes.

Examples of matters that fall outside the substantive scope of this policy include, but are not limited to:

- admissions decisions and appeals;
- statutory SEND assessments and tribunal matters;
- exclusions;
- staff grievances, capability or disciplinary proceedings;
- whistleblowing disclosures;
- safeguarding matters;
- data protection and Freedom of Information requests; and
- matters subject to Police investigation or legal proceedings.

Where a concern is raised that falls outside the scope of this policy, the Trust/school will explain this clearly and signpost the complainant to the appropriate alternative process.

Further detail, including how these matters are handled, is set out in Appendix A.

2.4 **Special Educational Needs and Disabilities (SEND) Related Concerns and Complaints**

Complaints relating to special educational needs and disabilities (SEND) will be handled sensitively and in line with this policy. Concerns should be initially raised informally, whether by e-mail, letter or a telephone call with the school's SENDCo (Special Educational Needs and Disabilities Co-ordinator). The SENDCo will look to respond to the concerns immediately where possible. If required, they will investigate the concerns and report back within a week.

This policy can consider complaints about:

- day-to-day SEND provision;
- communication or process issues; or
- implementation of agreed provision.

This policy cannot be used to:

- change the content of an Education, Health and Care Plan (EHCP); or
- challenge statutory decisions.

Where appropriate, complainants will be advised of alternative statutory routes, including the SEND Tribunal.

2.5 **Complaints Involving Police or Other External Agencies**

In some circumstances, issues raised within a complaint may also be subject to investigation by the Police, safeguarding partners, the Local Authority, regulatory bodies, or other external agencies.

The involvement of an external agency does not, of itself, prevent a complaint from being raised or acknowledged under this policy. However, where necessary and appropriate, the Trust may:

- pause its own investigation;
- limit the scope of its consideration; or
- adjust how the complaint is handled.

This may be necessary in order to avoid prejudice to external investigations, comply with legal or safeguarding obligations, or act in the public interest.

Where a complaint is paused or restricted for these reasons, the Trust will:

- confirm this in writing to the complainant;
- explain, so far as it is lawful and appropriate to do so, the reason for the decision; and
- keep the position under review.

The Trust's complaints procedure is not a substitute for criminal, safeguarding, regulatory, or statutory processes. Matters that fall outside the Trust's remit or powers will not be determined through this policy, although the administrative handling of such matters may be considered.

Once external proceedings have concluded, or where it becomes appropriate to do so, the Trust will determine whether and how the complaint may progress further under this policy.

3. Principles for Handling Complaints

3.1 Exceed Academies Trust and our schools will:

- treat all complaints seriously and respectfully;
- seek early and informal resolution where appropriate;
- investigate complaints impartially and proportionately;
- ensure decision-makers are independent of earlier stages;

- distinguish between complaint substance and complainant behaviour;
- communicate clearly, courteously, and accessibly;
- keep accurate records; and
- use learning from complaints to improve services.

4. Responsibilities and Governance

4.1 Under the Trust's Scheme of Delegation:

- Headteachers and Local Advisory Boards (LABs) are delegated responsibility for complaints handling at Stages 1–3 for school-level complaints. A Governor will usually only be involved if a complaint reaches Stage 3. Governors and Trustees should not be approached or contacted directly for the purpose of raising or progressing a complaint; this policy and procedure must be followed.
- The Trust Board retains responsibility for the final review stage (Stage 4) and overall oversight.

4.2 Clear roles are established at each stage of the complaints procedure:

- Stage 1: Investigating Officer.
- Stage 2: Reviewing Officer.
- Stage 3: Single Independent Governance Reviewer.
- Stage 4: Complaint Review Panel.

4.3 At each formal stage of the procedure, the complaint must be handled or reviewed by a person who has had no prior involvement in the matter.

4.4 **Conflict of Interest**
Before commencing any stage, the decision-maker must confirm they have no conflict of interest (including personal, professional, or prior involvement). Where a conflict exists, the matter will be reassigned to an alternative appropriate decision-maker.

4.5 Governance oversight of the complaints process does not involve Trustees or Local Governors investigating individual complaints or directing outcomes. Oversight is exercised by ensuring that the complaints procedure is applied consistently, fairly and in accordance with this policy, and that appropriate independence is maintained at each stage.

5. Raising Complaints and Concerns

5.1 **Informal Resolution**
Complainants are encouraged, where possible, to raise concerns first with the most appropriate person at the school or service level (for example, a class teacher, pastoral lead, Headteacher, service lead, class-based mentor or lead mentor). Many issues can be resolved promptly through discussion without the need for formal processes.

Complainants are encouraged to engage constructively and to allow reasonable opportunity for informal resolution. *Trustees and local governors must remain impartial and should not be approached directly to raise concerns or complaints.*

5.2 **Access to the Formal Complaints Process**

Informal resolution is encouraged but is not mandatory. Complainants may proceed directly to a formal complaint under this policy if they wish.

Where a complaint relates primarily to the actions, decisions or operation of an individual academy or service, it should normally be raised at that level in the first instance. This ensures that concerns are considered as close as possible to the point of origin and by those best placed to respond.

Where a complaint is received by the Trust that relates to an individual academy or service and has not previously been raised at that level, the Trust may refer the matter to the appropriate academy or service to be considered initially under Stage 1 of this policy.

5.3 **Complaints About Senior Members of Staff**

Where a complaint relates to a senior member of staff within the Trust (including a Headteacher, Executive Headteacher, Chief Executive Officer or other Chief Officer, Director of Exceed SCITT, or Director of Exceed Teaching School Hub), complainants are encouraged, where they feel comfortable to do so, to raise the matter informally in the first instance in order to seek early resolution.

Informal resolution is not mandatory. Where a complainant does not feel it is appropriate to raise the matter directly with the individual concerned, or where informal resolution has not resolved the issue, a written formal complaint may be submitted. Complaints will then be considered in accordance with the four-stage complaints procedure.

5.4 **Expectations on Complainants**

Exceed Academies Trust expects that complainants will:

- provide clear and relevant information about the issues raised;
- explain the remedy or outcome they are seeking;
- engage respectfully and reasonably with staff; and
- ask for assistance if they are unsure how to raise a concern or complaint.

Complainants are not required to use legal language. However, concerns and desired outcomes must be articulated clearly enough to allow the Trust to understand the issues and investigate them effectively.

Where complainants choose to use artificial intelligence (AI) tools to support the drafting of a complaint or other correspondence, they remain responsible for ensuring that the information provided is accurate, relevant to their circumstances and appropriately expressed. The use of AI does not affect how a complaint will be considered; complaints are assessed on their substance.

The Trust's Social Media and Respectful Communications Charter sets out the shared expectations that support respectful and constructive communication between families, schools and the Trust. These expectations apply throughout the complaints process but do not prevent or discourage any parent or carer from raising a genuine concern or making a complaint in accordance with this policy.

6. Submission of Formal Complaints and Time Limits

6.1 **How to Submit a Formal Complaint**

Formal complaints should be submitted in writing. The Complaint Form provided at Appendix B may be used if helpful, but its use is not mandatory.

Formal complaints, and any subsequent requests to progress a complaint to the next stage of the procedure, should be made in writing (including by email) and should normally include:

- the complainant's name;
- the name and year group of the child concerned (where applicable);
- contact details;
- details of the complaint;
- details of any action taken to date, including the names of staff involved where known;
- the reason the complainant remains dissatisfied with the response received; and
- the outcome or remedy sought.

Complainants who require assistance to submit a written complaint, for example due to disability, SEND, language barriers or other individual circumstances, are encouraged to contact the school or Trust so that appropriate support or reasonable adjustments can be considered.

6.2 **Time Limits for Raising Complaints**

Complaints should normally be raised within **three months** of the issue arising. This is intended to support fair and effective investigation while information remains reasonably current.

Exceptions may be made where there is a good reason for delay, such as newly discovered or previously unavailable evidence, or other exceptional circumstances. Decisions on whether to accept a complaint outside this timeframe will be made on a case-by-case basis.

6.3 **School Holidays**

Complaints received during school holidays will normally be treated as received on the first school day following the end of the holiday period.

6.4 **Timescales and Requests for Escalation**

Requests to escalate a complaint to the next stage of the procedure should normally be made within **five school days** of receipt of the written outcome at the previous stage.

This timescale is intended to support timely resolution and to ensure that complaints are considered while relevant information remains current.

Where a request for escalation is submitted outside this timeframe, the Trust may, at its discretion, agree to consider the escalation where the complainant can demonstrate a good reason for the delay, such as:

- illness or exceptional personal circumstances; or
- new and material evidence that could not reasonably have been provided earlier.

Where no good reason is provided, the Trust may determine that the complaint has been concluded at the previous stage, and this decision will be confirmed in writing.

Where a complaint has been considered in accordance with this procedure and a request is made to escalate beyond that point, the Trust will assess whether further escalation is appropriate, including whether any reasonable or proportionate outcome could be achieved, in line with the provisions set out in Section 6.5.

6.5 **Formal Closure Where No Reasonable or Proportionate Outcome Can Be Achieved**

Following completion of Stage 1, and at any subsequent stage of this procedure, the Trust may determine that it is not appropriate for a complaint to proceed further where, having considered the substance of the complaint and the handling to date, it concludes that no reasonable or proportionate outcome can be achieved through further escalation. Any decision to refuse further escalation or to formally conclude a complaint on the basis that no reasonable or proportionate outcome can be achieved will normally be taken by a senior Trust officer or governance representative who has had no prior involvement in the complaint and no conflict of interest. Such decisions will be recorded with reasons.

This may apply, for example, where:

- the complaint has been investigated appropriately and in accordance with this policy;
- the complainant's dissatisfaction relates solely to disagreement with a decision that was reasonably and lawfully reached;
- the outcome sought is not lawful, not within the Trust's powers, or would be disproportionate;
- the matters raised have already been fully considered and addressed; or
- further escalation would not be capable of resulting in any meaningful or different outcome.

This power will not be used lightly. Before reaching such a decision, the Trust will be satisfied that:

- the complaint has been handled fairly, impartially and proportionately;
- relevant evidence has been considered;
- the complainant has been given a reasonable opportunity to explain their concerns; and
- the written response provided is clear, reasoned and addresses the substance of the complaint.

Where a decision is taken to formally close a complaint on this basis, the complainant will be notified in writing. The notification will:

- explain the reasons for the decision;
- confirm that the relevant stage of the complaints procedure has been concluded; and
- set out any remaining right to request a review of whether the complaints procedure itself has been followed appropriately, where applicable.

A decision to close a complaint on the basis that no reasonable or proportionate outcome can be achieved does not prevent the Trust from considering new, materially different issues raised subsequently.

7. Stages of the Complaints Procedure

7.1 Overview of the Four-Stage Process

This policy operates a four-stage complaints procedure. Formal complaints are considered through the stages set out in this section. Each stage must normally be completed in full before a complaint is escalated to the next stage.

The purpose of this staged approach is to ensure that complaints are considered thoroughly, fairly and proportionately, and that issues are addressed as close as possible to the point of origin.

7.2 General Principles Applying to All Stages

The following principles apply throughout the complaints process:

- Complaints progress sequentially through the stages of the procedure. Each stage must normally be completed before escalation to the next stage.
- At each stage, the individual responsible for handling or reviewing a complaint will be confirmed by the school or Trust, having regard to the nature of the complaint, the requirement for independence, and the Trust's Scheme of Delegation.
- Requests to escalate a complaint should not normally be made until the relevant stage has concluded and a written outcome has been issued.
- Where a response at a particular stage is delayed, complainants are encouraged to contact the school or Trust to seek an update on progress.
- Delay alone does not automatically justify escalation to the next stage.
- Any delays, and the reasons for them, may be considered at the next stage where relevant, but do not remove the requirement for complaints to progress sequentially through the stages.

7.3 Stage 1 – Initial Formal Complaint

Submitting a Formal Complaint

A written formal complaint should be submitted to the relevant person identified in Appendix A.

At this stage, complainants are expected to provide sufficient clarity to enable the complaint to be understood and investigated. This includes, as far as reasonably possible:

- the substance of the complaint; and
- the outcome or remedy sought.

Where a complainant is unwilling or unable to provide this clarity, despite reasonable offers of assistance, consideration may be given as to whether it is appropriate to progress the complaint further in accordance with Section 19 (Unreasonable Complaints).

Acknowledgement and Clarification

Receipt of the complaint will be acknowledged in writing within **five school days**. Clarification or further information may be requested where reasonably required to progress the complaint. Consideration will also be given to whether a meeting would assist in achieving clarity.

The investigation may be delegated to another appropriate member of staff; however, responsibility for the decision and response will not be delegated.

Investigation
The investigating officer will, as appropriate:

- speak with those involved in the matter and/or those complained of, allowing them to be accompanied if they wish; and
- maintain a written record of relevant information gathered.

Response and Outcome
A formal written response will normally be provided within **25 school days** of receipt of the complaint. Where this is not possible, the complainant will be informed of the reason for delay and provided with a revised response date.

The response will explain:

- how the complaint has been considered;
- the decision reached and the reasons for it; and
- where appropriate, any actions to be taken to address the matter or prevent recurrence.

Independent Investigation
Where appropriate, having regard to the nature or complexity of the complaint, Stage 1 may be undertaken by an independent investigator appointed by the Trust.

7.4 Stage 2 – Formal Complaint Escalation

Requesting Escalation
Where a complainant remains dissatisfied following the Stage 1 response, they may request escalation to Stage 2 within **five school days** of receipt of the Stage 1 outcome.

The request should explain why the complainant believes the complaint has not been handled appropriately, for example by reference to procedural fairness, the evidence considered, or the reasonableness of the decision. Disagreement with the outcome alone is not sufficient to justify escalation.

Requests for escalation will be considered in line with this policy. Where, having regard to the complaint and the outcome sought, it is determined that no reasonable or proportionate outcome could be achieved by further review, the Trust may decide that the complaint should not proceed to Stage 2 and may apply the formal closure provisions of this policy.

Scope and Review Process
Stage 2 is a review stage, not a reinvestigation. It will consider:

- the original complaint;
- the Stage 1 investigation;
- the evidence relied upon;
- the decision reached; and
- whether the complaint was handled fairly and in accordance with this policy.

Only complaints that have completed Stage 1 will be considered at this stage. New complaints must be addressed from the start of the procedure, even where another complaint is ongoing.

Outcome and Timescale
A formal written response will normally be issued within **25 school days** of receipt of the escalation request. Where this timescale cannot be met, the complainant will be informed and provided with an updated response date.

The response may confirm the Stage 1 outcome or, where appropriate, reach a different conclusion and identify revised actions.

7.5 Stage 3 – Formal Complaint Review

Stage 3 provides a further review of whether the complaint has been handled appropriately and proportionately at earlier stages. It is not an investigation or rehearing.

Requests for escalation must be submitted **within five school days** of receipt of the Stage 2 response.

Escalation to Stage 3 is not automatic. Where the Trust determines that the complaint has been handled appropriately at earlier stages and that no reasonable or proportionate outcome could be achieved by further review, it may conclude the complaint without progression to Stage 3, in accordance with the formal closure provisions of this policy.

Possible outcomes include confirmation of appropriate handling, a direction for limited reconsideration, and/or recommendations for procedural improvement.

A formal written response will normally be issued **within 25 school days**.

7.6 Stage 4 – Complaint Review Panel

A request for escalation to Stage 4 will be considered in accordance with this policy. Escalation is not automatic. Where the Trust determines that the complaint has been considered appropriately at earlier stages and that no reasonable or proportionate outcome could be achieved by convening a Complaint Review Panel, the Trust may decide not to progress the complaint to Stage 4 and may formally conclude the complaint in line with the closure provisions set out in this policy.

Requests for escalation must be submitted **within five school days** of receipt of the Stage 3 response.

Stage 4 is the final stage of the Trust's complaints procedure and involves an independent Complaint Review Panel.

Stage 4 is convened where a complaint has been accepted for panel review in accordance with this policy. The panel will not rehear the complaint or consider new matters. Its role is to determine whether the complaint has been handled in accordance with this policy and whether decisions reached were reasonable.

Full arrangements for Stage 4 are set out in Appendix G.

7.7 **Completion of the Complaints Procedure**
The decision of the Complaint Review Panel concludes the Trust's internal complaints procedure. Once the written outcome of Stage 4 has been issued, the Trust's complaints process is considered to be exhausted.

8. Referring Complaints After Completion of the Trust's Procedure

8.1 **Completion of the Trust's Complaints Procedure**
Once Stage 4 of this complaints procedure has been completed and the written outcome of the Complaint Review Panel has been issued, the Trust's internal complaints procedure is considered to be exhausted.

The Trust will not normally re-open or reconsider a complaint once the procedure has been exhausted, except where required to do so by law or where there is compelling new evidence that could not reasonably have been provided earlier.

8.2 **Referral to the Department for Education**
If, after completing Stage 4, a complainant believes that their complaint has not been handled in accordance with this published complaints procedure, or that the Trust has acted unlawfully or unreasonably in the exercise of its duties under education law, they may refer the matter to the Department for Education (DfE).

The DfE will not normally reinvestigate the substance of the complaint or overturn the Trust's decisions. The DfE's role is to consider whether the Trust has followed its complaints procedure correctly and complied with relevant education legislation and statutory requirements.

Contact details for the Department for Education:
- Online: https://www.gov.uk/contact-dfe
- Telephone: 0370 000 2288

8.3 **Apprenticeship Complaints**
Where a complaint relates to apprenticeship provision and the Trust's complaints procedure has been fully exhausted, complainants may also wish to seek advice or support from the Apprenticeship Service.

Apprenticeship Service contact details:
- Telephone: 08000 150 600
- Email: helpdesk@manage-apprenticeships.service.gov.uk

8.4 **Effect of External Referral**
Referral of a complaint to the Department for Education or other external bodies does not form part of the Trust's internal complaints procedure. Once the Trust's procedure has been exhausted, any further consideration of the complaint by external bodies is outside the Trust's control.

9. Staff Conduct and Employment Matters

9.1 Where, at any stage of the complaints process, issues relating to staff conduct, capability or performance are identified, these will be considered separately and, where appropriate, addressed under the Trust's internal disciplinary or capability procedures.

9.2 Complaints handling procedures are not a substitute for disciplinary processes.

9.3 Complainants will not be informed of the details or outcomes of any disciplinary or capability action taken in relation to a member of staff, as these are confidential employment matters. However, the complainant will be advised that appropriate action is being taken where this is relevant to the issues raised.

10. Confidentiality and Social Media

10.1 In order for complaints to be considered fairly, thoroughly and without undue influence, Exceed Academies Trust requests that complainants do not discuss live complaints publicly, including via social media platforms such as Facebook, X (formerly Twitter), Instagram, TikTok, Snapchat etc, while the Trust's complaints procedure is ongoing. This request for discretion is not a requirement and does not limit the complainant's rights to seek advice, raise concerns with external bodies, or express lawful opinions.

10.2 The Trust will deal with complaints confidentially, sharing information only with those who need to know in order to investigate and respond appropriately. Complainants are asked to observe a similar level of discretion to support a fair and effective process. This request for confidentiality does not prevent complainants from seeking independent advice, support, or representation, nor does it prevent them from raising concerns with appropriate external bodies once the Trust's complaints procedure has been completed.

10.3 Where comments made publicly are defamatory, abusive, discriminatory or otherwise inappropriate, the Trust may take appropriate action, which may include reporting the matter to relevant authorities where lawful and proportionate to do so.

11. Duplicate Complaints

11.1 There may be circumstances where, following the completion of the Trust's complaints procedure, the school or Trust receives a complaint from another individual (for example, a complainant's spouse, partner, or other family member) relating to the same substantive issue.

11.2 Where the complaint concerns the same matter and no new substantive issues are raised, the new complainant will be informed that the complaint has already been considered and that the Trust's complaints procedure has been completed. They will be advised that they may contact the Department for Education (DfE) if they are dissatisfied with the way in which the original complaint was handled.

11.3 The school or Trust will take care not to overlook any genuinely new aspects or materially different concerns. Any new elements not previously considered will be investigated and addressed in accordance with the full complaints procedure.

12. Serial and Persistent Complaints

12.1 The school or Trust will act reasonably and proportionately when dealing with individuals who repeatedly raise the same complaint or persistently seek to re-open matters that have already been fully considered through the Trust's complaints procedure.

12.2 Where a complainant attempts to re-open an issue that has completed the complaints procedure, the Exceed Academies Trust Governance Manager will normally inform the complainant in writing that the matter has been concluded.

12.3 If the complainant continues to contact the school or Trust regarding the same issue without presenting new substantive information, the complaint may be considered serial or persistent. In such circumstances, the Trust may decide not to enter into further correspondence on the matter.

12.4 The Trust will not take a decision to limit further correspondence lightly. Before doing so, the Trust will ensure that:

- all reasonable steps have been taken to address the complaint;
- the complainant has received a clear written explanation of the Trust's position; and
- it is evident that the complainant is continuing to pursue the same issue without new grounds.

12.5 Where a complainant's behaviour becomes disruptive, abusive or threatening, the Trust may take proportionate steps to protect staff and resources, which may include limiting contact or specifying methods of communication. Any such decision will be confirmed in writing.

12.6 Any new complaint raised by a complainant previously identified as serial or persistent will be considered on its own merits and responded to in accordance with this policy.

13. Complaints Campaigns

13.1 For the purposes of this policy, a "complaints campaign" refers to circumstances where:

- the school or Trust receives a high volume of complaints based on the same subject matter; and/or
- the school or Trust receives multiple complaints from individuals who are not directly connected to the school or Trust.

13.2 In the event of a complaints campaign, the school or Trust may choose to respond in a proportionate manner by:

- issuing a standard response to all complainants; or
- publishing a single consolidated response on the school's or Trust's website.

13.3 This approach will not prevent the Trust from considering individual complaints separately where they raise distinct issues or demonstrate a specific and personal impact that has not otherwise been addressed.

14. Unreasonable Complaints

14.1 Exceed Academies Trust is committed to dealing with complaints fairly, impartially and with respect. The Trust will not normally limit contact with complainants; however, staff are not expected to tolerate behaviour that is abusive, offensive, threatening or unreasonably persistent. The Trust will take appropriate action to protect staff and the effective operation of its services.

14.2 An unreasonable complainant is defined as one who, because of the frequency or nature of their contact, hinders the Trust's consideration of their complaint or the complaints of others.

14.3 A complaint may be considered unreasonable where a complainant:

- refuses to articulate their complaint or specify the grounds or outcomes sought, despite reasonable offers of assistance;
- refuses to co-operate with the investigation process while insisting that the complaint be resolved;
- refuses to accept that certain matters fall outside the scope of the complaints procedure;
- insists on pursuing the complaint in ways incompatible with this policy or good practice;
- repeatedly raises trivial, irrelevant or excessive detail and demands immediate responses;
- makes unjustified complaints about staff and seeks their removal;
- repeatedly changes the basis of the complaint as it progresses;
- persistently re-raises the same complaint after it has been fully investigated and concluded;
- refuses to accept properly reached findings, including after referral to the Department for Education;
- seeks outcomes that are unrealistic or disproportionate; or
- makes excessive demands on staff time through frequent or lengthy contact.

14.4 A complaint may also be considered unreasonable where it is pursued in a manner that is malicious, aggressive, threatening, knowingly false, reliant on falsified information, or involves abusive, offensive or discriminatory language, including through public or social media platforms.

14.5 Complainants are encouraged to limit communications while a complaint is being progressed, as excessive or repeated contact may delay the investigation and response.

14.6 Where possible, the Trust will seek to address concerns about behaviour informally before applying restrictions.

14.7 If unreasonable behaviour continues, the complainant will be informed in writing of any restrictions being applied. This may include limiting methods or frequency of contact. The substance of the complaint will continue to be considered in accordance with this policy.

14.8 Any serious incident involving aggression or violence will be recorded in writing and may be reported to the police. This may include restricting access to Trust premises.

14.9 The Trust reserves the right not to consider complaints that are malicious, use obscene or discriminatory language, contain personal abuse of staff, or are repeatedly submitted with only minor variations after the complaint has been fully addressed.

15. Barring from the Premises

15.1 School premises are private property. The Trust may restrict or revoke an individual's access to its premises where this is necessary to maintain the safety, wellbeing or orderly operation of the school.

15.2 Where an individual's behaviour gives rise to concern, the Headteacher may require that individual to leave the premises.

15.3 Where access is restricted, the individual will be notified in writing that their implied licence to enter the premises has been temporarily revoked, the reasons for this decision, and the duration of the restriction, subject to any representations they may wish to make.

15.4 The individual will be given the opportunity to formally express their views regarding the decision.

15.5 Any decision to bar an individual will be reviewed by the Exceed Academies Trust Governance Manager, taking into account all relevant information and representations.

15.6 Restricting access to premises does not prevent an individual from submitting or progressing a complaint in writing in accordance with this policy.

APPENDIX A – Where to Raise Different Types of Concerns and Complaints

This table sets out the usual starting point for different types of concerns or complaints and explains how they are normally handled.

Where a concern relates to a specific school or service, it will usually be considered as close as possible to the point of origin. Some matters are governed by separate statutory or regulatory processes and are therefore not dealt with under this complaints procedure.

Type of Concern or Complaint	Where the Concern or Complaint Is Normally Raised First	How it is Handled	Handled Under This Complaints Procedure?
Day-to-day classroom issues (e.g. teaching, behaviour, routines)	Class teacher or appropriate school staff member	Informal resolution (before Stage 1 where possible)	Yes
Pastoral or pupil wellbeing concerns	Pastoral lead or senior school leader/ Headteacher	Informal resolution (before Stage 1 where possible)	Yes
SEND provision – day-to-day support, communication or implementation of agreed provision	School SENDCo	Informal resolution where possible	Yes
SEND provision concerns not resolved informally	Headteacher	Stage 1	Yes
Complaints about school operational management, school processes, or leadership decisions	Headteacher	Informal resolution (before Stage 1 where possible)	Yes
Complaints about the Headteacher / Head of School / Head of Primary / Head of Secondary / Head of Centre	Executive Headteacher (if applicable) or Exceed Academies Trust Governance Manager	Stage 1	Yes
Complaints about Trust-wide policies or Trust-level decisions	Exceed Academies Trust (via the Governance Manager)	Informal resolution (before Stage 1 where possible)	Yes
Complaints about Exceed SCITT provision	Director of Exceed SCITT	Informal resolution (before Stage 1 where possible)	Yes
Complaints about Exceed Teaching School Hub services	Director of Exceed Teaching School Hub	Informal resolution (before Stage 1 where possible)	Yes
Complaints about senior Trust staff (Executive Headteacher, CEO, Director, Chief Officer)	Exceed Academies Trust (via the Governance Manager)	Stage 1	Yes
Complaints about local governors	Exceed Academies Trust (via the Governance Manager)	Stage 1	Yes

Type of Concern or Complaint	Where the Concern or Complaint Is Normally Raised First	How it is Handled	Handled Under This Complaints Procedure?
Complaints about Trustees or the Trust Board	Exceed Academies Trust (via the Governance Manager)	Stage 1	Yes
Complaints about the handling of a complaint at an earlier stage	As set out in this policy	Stage 2 and subsequent applicable stages	Yes
Concerns or allegations relating to safeguarding	School safeguarding lead or Trust safeguarding procedures	Acknowledged and managed under safeguarding procedures and statutory guidance	No
Staff conduct concerns (including allegations)	School or Trust as appropriate	Acknowledged and managed under employment and/or safeguarding procedures	No
Pupil admissions or admissions appeals	Relevant admissions authority	Statutory admissions process	No
Pupil exclusions	Statutory exclusions process	Statutory process	No
Complaints about EHCP content or statutory SEND decisions	Local Authority or SEND Tribunal	Statutory SEND process	No
Whistleblowing	Trust Whistleblowing Policy	Separate whistleblowing process	No
Complaints relating to data protection or FOI requests	Trust Data Protection Complaints Procedure	Separate process	No
Concerns, complaints or appeals relating to Early Career Teacher induction (Appropriate Body role of Exceed Teaching School Hub)	As set out in the Appropriate Body Concerns, Complaints and Induction Appeals Guidance	Separate guidance applies	No
Appeals relating to internal or external assessment decisions for external qualifications	As set out in JCQ guidance	Separate examination appeals process	No
Complaints about pupil attendance Notices to Improve or Fixed Penalty Notices	Relevant Local Authority	Statutory process (no right of appeal for Penalty Notices)	No

Safeguarding and Staff Conduct Concerns
Any concern or allegation relating to safeguarding or staff conduct may be raised with the school or Trust at any time. Such concerns will be acknowledged and considered to determine the most appropriate response.

Safeguarding and staff conduct concerns may range from lower-level concerns about practice or conduct through to more serious allegations. The response will depend on the nature and severity of the concern and will be managed in accordance with the Trust's safeguarding and employment procedures and statutory guidance, including *Keeping Children Safe in Education*.

Where a concern meets safeguarding thresholds, this may include consultation with the Local Authority Designated Officer (LADO) and, where appropriate, referral to external agencies.

Safeguarding and staff conduct matters are not investigated or progressed through the Trust's complaints procedure. Where a concern or complaint is received under this procedure but is assessed as relating to safeguarding or staff conduct, it will be acknowledged and redirected to the appropriate process and will not progress through the complaints stages.

For reasons of confidentiality and employment law, complainants will not normally be provided with detailed information about actions taken or outcomes arising from internal staff conduct or safeguarding processes.

Accessibility and Support
If you are unsure where to raise a concern or how to submit a complaint, the school or Trust will provide assistance to help you access the complaints process. This includes support for individuals with additional needs, language barriers or accessibility requirements.

APPENDIX B – Formal Complaint Form

(This form may be used to submit a formal complaint under the Trust's Complaints Policy. Use of this form is optional, but it helps us understand and respond to a complaint effectively.)

Section 1 – Complainant Details
Your full name: Click or tap here to enter text.

Relationship to the pupil / service user (if applicable):
☐ Parent / carer
☐ Pupil / student
☐ Former pupil / student
☐ Member of the public
☐ Other (please specify): Click or tap here to enter text.

Pupil's name (if applicable): Click or tap here to enter text.

School / service involved:

☐ Named school: Click or tap here to enter text.
☐ Exceed SCITT
☐ Exceed Teaching School Hub
☐ Trust-wide matter

Preferred method of contact:
☐ Email ☐ Letter ☐ Telephone

Contact details:
Email: Click or tap here to enter text.
Telephone: Click or tap here to enter text.
Postal address (if required): Click or tap here to enter text.

Section 2 – What Is Your Complaint About?
Please clearly describe your complaint.
Include what happened, when it happened, and who was involved.
(You do not need to use legal language. Plain English is fine.)

Click or tap here to enter text.

Section 3 – What Outcome Are You Seeking?
To help us understand how this matter might be resolved, please explain what outcome or remedy you are seeking.

For example:
- an explanation or apology;
- clarification of a decision;

- a review of a process; or
- changes to practice to prevent recurrence.

Click or tap here to enter text.

If the outcome you are seeking is not within the Trust's powers or is not achievable, we will explain this clearly when responding.

Section 4 – What Has Already Happened?
Please tell us what steps have already been taken to try to resolve your concern.

Have you raised this informally?
☐ Yes ☐ No

If yes, please state:
- who you contacted;
- when; and
- the outcome (if any).

Click or tap here to enter text.

Section 5 – Stage of the Complaints Procedure
Please indicate which stage of the complaints procedure you believe this complaint is at:
☐ Stage 1 – Initial Formal Complaint
☐ Stage 2 – Formal Complaint Escalation
☐ Stage 3 – Formal Complaint Review
☐ Unsure (the Trust will confirm the correct stage)

Note: Complaints must normally complete each stage before escalation.

If you are requesting escalation, please explain why you remain dissatisfied with the previous stage and what you believe was not handled appropriately (for example, fairness, evidence considered, or procedure followed).

Click or tap here to enter text.

Section 6 – Supporting Information
Please list any documents, emails or other information you wish to rely on.
(Do not include original documents unless requested.)

Click or tap here to enter text.

Section 7 – Accessibility and Support
Do you require any reasonable adjustments to support you through the complaints process?
☐ Yes ☐ No

If yes, please explain:

Click or tap here to enter text.

Section 8 – Declaration
I confirm that:

- the information provided is accurate to the best of my knowledge;
- I have explained the outcome I am seeking; and
- I understand that the complaints process is intended to resolve concerns proportionately and fairly.

Signed: Click or tap here to enter text.
(Typing your name is acceptable for electronic submission.)

Date: Click or tap to enter a date.

Privacy Notice – Complaints Handling

How we use your information
Exceed Academies Trust will use the information you provide:

- to consider and investigate your complaint;
- to communicate with you about the complaint; and
- to meet our legal, regulatory and governance obligations.

Information will be shared only with those who need to see it to handle the complaint properly, including relevant staff, governors, trustees, or external advisers where appropriate.

Retention
Complaint records are retained securely in accordance with the Trust's retention schedule and data protection obligations.

Your rights
You have rights under UK data protection law, including the right to access your personal data. Further information is available in the Trust's Privacy Notice.

Submitting Your Complaint
Completed complaint forms should be sent to the relevant contact listed in **Appendix A** of the Complaints Policy, or marked for the attention of the Exceed Academies Trust Governance Manager where appropriate.

APPENDIX C – Complaints Procedure: A Summary for Parents and Carers

(This summary should be read alongside the Complaints Procedure Flowchart at Appendix D)

Our approach to concerns and complaints
We recognise that when concerns arise, they can cause frustration, worry, or distress, and it may feel important to raise them quickly.

While parents and carers have the right to contact external bodies (such as Ofsted, the Department for Education, the Local Authority, the Police, MPs or councillors), we encourage concerns to be raised with the school or Trust first wherever possible.

In most cases, working directly with the school is the most effective way to understand what has happened and reach a reasonable resolution. Involving external bodies at an early stage often delays outcomes and increases complexity.

Parents and carers may also find the Trust's Social Media and Respectful Communications Charter and Guide for Parents: Raising Concerns and Complaints helpful when raising a concern or complaint.

Step 1: Raise a Concern Informally (Where Possible)
Most issues can be resolved quickly through informal discussion.

You are encouraged to raise concerns with the most appropriate person, such as:
- your child's class teacher;
- the SENDCo (for SEND-related concerns);
- a pastoral lead or mentor; and
- the Headteacher or service lead.

Informal resolution is encouraged but not required. You may proceed directly to a formal complaint if you wish.

What Is a Complaint?
A complaint is an expression of dissatisfaction where you are seeking:
- an explanation;
- a remedy; or
- a change.

When raising a complaint, it is important to explain:
- what has happened; and
- what outcome you are hoping for.

Using legal language or complex terminology does not change how a complaint is handled and can make it harder for the school to clearly understand the issue and the resolution sought.

The Four-Stage Formal Complaints Procedure
The Trust uses a four-stage formal complaints process, shown in the flowchart in Appendix D.

Each stage must normally be completed before a complaint can move to the next stage.

Stage 1 – Initial Formal Complaint

- Submit your complaint in writing to the appropriate person (see Appendix A).
- Your complaint will be acknowledged within 5 school days.
- The school or Trust will investigate the matter fairly and proportionately.
- A written response will normally be provided within 25 school days.

Stage 2 – Formal Complaint Escalation

If you remain dissatisfied, you may request escalation to Stage 2 within five school days of receiving the Stage 1 response.

Stage 2:

- reviews how the complaint was handled at Stage 1;
- considers whether the investigation was fair and reasonable; and
- does not automatically re-investigate the complaint.

A written response will normally be issued within 25 school days.

Stage 3 – Formal Complaint Review

If concerns remain, you may request escalation to Stage 3 within five school days of the Stage 2 response.

Stage 3 is:

- a procedural and reasonableness review by a governance representative;
- not a reinvestigation of the complaint.

A written response will normally be issued within 25 school days.

Stage 4 – Complaint Review Panel (Final Stage)

If you remain dissatisfied, you may request escalation to Stage 4 within five school days of the Stage 3 response. This stage is a complaint panel review.

- The panel is made up of three independent people, including one independent of the Trust.
- The panel does not rehear the complaint, but reviews whether it has been handled properly.
- You will receive a written decision explaining the panel's findings.

This is the final stage of the Trust's complaints procedure.

Time Limits

- Complaints should normally be raised within three months of the issue occurring.
- Requests to escalate to the next stage must normally be made within five school days of receiving the previous response.

Missing a deadline does not automatically end a complaint, but you may be asked to explain the reason for the delay.

When This Complaints Policy Does Not Apply
Some matters must be dealt with under other legal or specialist procedures. These include:

- **Admissions decisions** - Concerns about school places or admissions decisions must be raised with the Local Authority.
- **EHCP content or statutory SEND decisions**
- **Exclusions** - Exclusions follow a separate legal process. Information is available at: https://www.gov.uk/school-discipline-exclusions/exclusions
- **Safeguarding matters** - Safeguarding concerns should always be raised immediately with the school.
- **Staff disciplinary or grievance matters** - Complaints about staff conduct may lead to internal disciplinary procedures. Parents and carers will not be told the outcome, but will be reassured that the matter is being addressed. Staff grievances are handled under a different policy.
- **Police investigations or court proceedings** - If an issue is being investigated by the Police, a court or a tribunal, the Trust may not be able to investigate the complaint at the same time. This is to avoid interfering with legal processes.
- **Other Pupils or Parents** - The Trust cannot investigate complaints about other pupils or parents or share information about them.

Where this applies, we will explain this clearly and tell you where to raise your concern.

SEND-Related Concerns
This policy can consider:

- day-to-day SEND provision; and
- communication or process issues.

It **cannot**:

- change an EHCP; or
- challenge Local Authority decisions.

You will be signposted to the correct statutory route where needed.

After the Procedure Is Complete
Once Stage 4 is complete, the Trust's complaints procedure is exhausted.

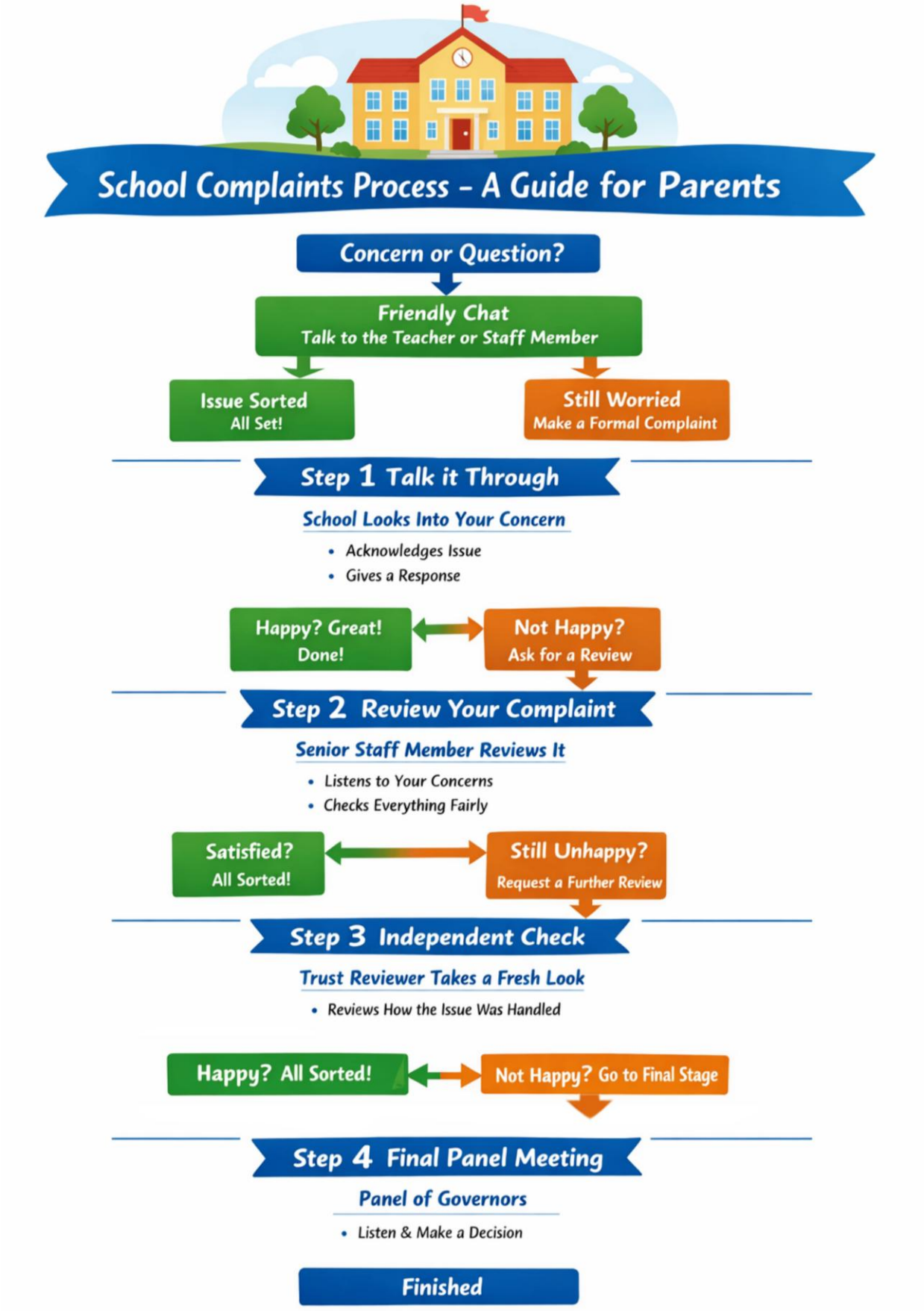
You may contact the Department for Education (DfE) if you believe:

- the complaints procedure was not followed correctly; or
- the Trust acted unlawfully or unreasonably.

The DfE does not investigate or reinvestigate complaints.

If You Are Unsure
If you are not sure which stage applies or how to raise a concern, staff will help guide you.

APPENDIX D – Complaints Procedure Summary Flowchart



APPENDIX E – Definitions and Glossary

This glossary explains key terms used throughout the Complaints Policy to help ensure clarity and shared understanding.

Term	Definition
Academy / School	An individual school within Exceed Academies Trust.
Academy Trust / Trust	Exceed Academies Trust, the legal entity responsible for governance, oversight and accountability of its schools and services.
Complaint	An expression of dissatisfaction, however made, about an action taken or a perceived failure to act, where the complainant seeks an explanation, remedy or change.
Concern	An issue or worry raised informally, often capable of being resolved without invoking the formal complaints procedure.
Complainant	An individual or group raising a concern or complaint under this policy.
Complaints Procedure	The Trust's formal four-stage process for handling complaints, as set out in this policy.
Escalation	A request for a complaint to move to the next stage of the procedure, normally on the basis that the complaint has not been handled appropriately at the previous stage.
Exhaustion of the Procedure	The point at which Stage 4 (Complaint Review Panel) has been completed and the Trust's internal complaints process has concluded.
Formal Complaint	A complaint submitted in writing and handled under the formal stages of this policy.
Governance Manager	The Trust officer responsible for overseeing the administration, coordination and procedural integrity of complaints, including complaints involving senior staff, governors or Trustees.
Independent	A person who has had no prior involvement in the matter being complained about and has no conflict of interest. In the context of a panel, an independent member is not an employee or Trustee of the Trust.
Independent Governance Reviewer	A single, independent governance representative allocated to undertake a governance-level review at Stage 3 of the complaints procedure.
Informal Resolution	Early attempts to resolve concerns through discussion or correspondence, without entering the formal complaints procedure.
Local Governors / Local Governing Body	Individuals or bodies with delegated responsibilities for governance at school level, in line with the Trust's Scheme of Delegation.
Outcome Sought	The remedy or resolution a complainant is seeking by raising a complaint (for example, an explanation, apology, review of process, or change to practice).
Panel / Complaint Review Panel	A panel convened at Stage 4 of the complaints procedure to review how a complaint has been handled. It consists of three members, including an independent member.

Term	Definition
Procedural Review	A review that considers whether a complaint has been handled fairly, reasonably and in line with the policy, rather than re-investigating the substance of the complaint.
SEND	Special Educational Needs and Disabilities.
SENDCo	Special Educational Needs and Disabilities Co-ordinator within a school.
Serial or Persistent Complaint	A complaint where a complainant repeatedly raises the same issue or seeks to re-open a matter that has already been fully considered under the complaints procedure.
Unreasonable Complaint / Unreasonable Behaviour	Complaint-related behaviour that, because of its nature or frequency, hinders the Trust's ability to consider the complaint fairly or effectively.
Vexatious Complaint	A complaint that is not genuinely aimed at resolving an issue, and may be intended to cause annoyance, disruption or distress. Such complaints are managed in line with the Trust's Unreasonable Complaints provisions.

APPENDIX F – Frequently Asked Questions (FAQs)

This section answers common questions about how the complaints process works.

Do I have to raise my concern informally first?

No. Informal resolution is encouraged because many issues can be resolved quickly through discussion, but it is not mandatory. You may submit a formal complaint at any time.

Can I complain directly to the Trust rather than the school?

If your complaint relates to an individual school or service, it should normally be raised there first so it can be addressed as close as possible to the issue.

If the Trust receives a complaint that has not been raised at school or service level, it may be referred back to that school or service to be considered at Stage 1.

What should I include in my complaint?

You should clearly explain:

- what your complaint is about;
- what has already happened; and
- what outcome or resolution you are seeking.

You do not need to use legal language.

Can I use artificial intelligence (AI) or legal language to help write a complaint?

Yes. You may choose to use artificial intelligence (AI) tools or legal terminology to help you draft your complaint if you wish.

However, the most helpful complaints are those that clearly and simply explain:

- what the concern is; and
- what outcome or resolution is being sought.

The use of legal jargon, whether accurate or not, does not affect how a complaint will be considered, investigated, or responded to. In practice, overly technical or legalistic language can make it harder for the school or Trust to gain a clear understanding of the issues and the outcome sought, which may delay progress while clarification is requested.

Complaints are assessed on their substance, not on the style, language used, or whether AI has been involved. Where a complaint is unclear, contradictory, or does not explain the outcome sought, the Trust may ask for clarification before deciding how the complaint can be progressed.

What if I do not explain the outcome I am seeking?

If the outcome sought is unclear, the Trust may ask for clarification. If a complainant refuses to explain what outcome they are seeking despite reasonable offers of assistance, the Trust may consider whether the complaint can be progressed further.

How long will each stage take?

Each formal stage normally takes up to 25 school days to complete.

If there is a delay, you will be informed and given an updated timescale.

Can I move to the next stage if a response is delayed?

No. A delay does not automatically trigger escalation.

Each stage must normally be completed before a complaint can move to the next stage. You are encouraged to contact the school or Trust for an update if timescales are missed.

Can new issues be added at later stages?

No. New complaints must start at Stage 1. Later stages consider only the issues already raised, unless the policy specifies otherwise.

Is each stage a full reinvestigation?

No.

- Stage 1 involves investigation of the complaint.
- Stages 2 and 3 are reviews of how the complaint was handled.
- Stage 4 is a panel review of the handling of the complaint.

The process is designed to be proportionate and fair.

Can outcomes change at later stages?

Yes, where appropriate. A reviewer may conclude that a different response or action is justified, even though the complaint is not re-investigated from the beginning.

What happens if there is no reasonable outcome that can be achieved?

Where a complaint has been fully considered and no lawful or reasonable outcome can be achieved, the Trust may formally close the complaint in line with the policy. The complainant will be informed of this decision and their right to challenge the handling of the complaint.

What if my complaint is about SEND?

Complaints about day-to-day SEND provision, communication or implementation of agreed support are handled under this policy.

Complaints about EHCP content or statutory decisions must follow separate legal processes, such as the SEND Tribunal.

What if my complaint is about staff conduct?

Complaints about staff conduct may be considered under internal disciplinary or capability procedures. Complainants will not be informed of any disciplinary action taken but will be told that the matter has been addressed.

Can my complaint be classed as unreasonable or persistent?

In some cases, where complaint-related behaviour significantly hinders the process, the Trust may manage contact or apply its unreasonable complaints provisions. This will not prevent new or different complaints from being considered.

When is the complaints procedure finished?

The procedure is finished once Stage 4 (Complaint Review Panel) has been completed and a written decision issued.

What can I do after the procedure is finished?

If you believe the Trust did not follow the complaints procedure correctly, or acted unlawfully or unreasonably, you may contact the Department for Education (DfE). The DfE considers whether the process was followed properly but does not usually re-investigate the complaint itself.

Can I contact external bodies at any time?

Yes. You may contact external bodies at any point. However, concerns are often resolved more quickly and effectively by working directly with the school or Trust through the complaints procedure in the first instance.

External bodies and organisations, such as the Department for Education (DfE) and Ofsted, will usually consider whether a school or trust has followed its published complaints procedures. They do not normally reinvestigate the substance of complaints or overturn decisions made at local level.

Raising the same issue with multiple organisations at the same time can sometimes delay outcomes. For this reason, we encourage complainants to work through each stage of the complaints procedure before escalating concerns elsewhere. In some circumstances, repeated or overlapping referrals that hinder the resolution of a complaint may lead to the complaint being considered unreasonable under the Trust's policy.

What happens if the Police or another external agency is involved?

You can still raise a complaint with the Trust and it will be acknowledged.

In some cases, the Trust may need to pause or limit how it handles the complaint while another organisation (such as the Police or safeguarding services) is involved. This is to make sure legal and safeguarding duties are met and that other investigations are not affected.

If this happens, the Trust will explain this to you and keep the situation under review. Once external processes have finished, the Trust will consider whether and how the complaint can continue.

APPENDIX G – Stage 4 Complaint Review Panel Arrangements

Audience
Parents and Carers; Trustees; Governance Manager; Clerks to Panels; Senior Leaders.

Purpose of Stage 4
Stage 4 of the complaints procedure provides an independent, final review of a complaint where escalation has progressed in accordance with this policy.

The purpose of the Complaint Review Panel is to:

- review whether the complaint has been handled appropriately at earlier stages;
- consider whether the Trust followed its published complaints procedure;
- assess whether decisions were reasonable, fair, and proportionate based on the evidence available at the time; and
- identify any procedural failings or learning points.

Stage 4 is not intended to be a re-investigation of the complaint and is not a further opportunity to re-argue matters of professional judgement simply because the complainant disagrees with the outcome.

Convening a Complaint Review Panel
A Complaint Review Panel will be convened where:

- a complainant has completed Stages 1–3 of the procedure;
- a written request for escalation to Stage 4 has been submitted within the timescales set out in this policy (or accepted at the Trust's discretion); and
- the Trust has determined that escalation to Stage 4 is appropriate and proportionate in the circumstances.

The Governance Manager is responsible for:

- acknowledging receipt of the Stage 4 request;
- facilitating determination of whether the request meets the criteria for escalation; and
- arranging the panel and clerk support.

Panel Composition
The Complaint Review Panel will consist of three members, including a designated Chair.

Panel members will:

- have had no prior involvement in the matters complained of;
- have had no involvement in the handling of the complaint at earlier stages; and
- have no conflict of interest or prior detailed knowledge of the complaint.

At least one panel member will be independent of the management and running of the Trust, meaning they are neither a Trustee nor an employee of the Trust.

A trained Clerk will be appointed to support the panel.

Format of the Panel Hearing
Complaint Review Panels may be held:

- in person;
- virtually (for example, via video conference); or
- using a hybrid format.

The format will be determined by the Trust, taking into account:

- the nature and complexity of the complaint;
- the needs and reasonable preferences of the parties; and
- practical considerations, including availability and accessibility.

The panel hearing is a private meeting.

Attendance and Representation
The complainant is entitled to attend the panel hearing and may be accompanied by a friend or relative for support.

Legal representatives and members of the media are not normally permitted to attend. However, the Trust may allow legal or trade union representation in exceptional circumstances.

Evidence and Documentation
The Clerk will circulate all relevant documentation to panel members and parties at least three school days before the hearing.

The panel will:

- consider only evidence that has already been considered at earlier stages; and
- not normally accept new evidence unless the panel determines that it could not reasonably have been provided earlier and is necessary to ensure procedural fairness.

Covert recordings or recordings made without the informed consent of all parties will not be accepted.

Conduct of the Hearing
The Chair will:

- explain the purpose and scope of the panel;
- outline how the hearing will be conducted; and
- ensure that proceedings are fair, respectful, and focused.

The panel may ask questions to clarify understanding but will not conduct a fresh investigation.

Complaint Review Panel – Terms of Reference

Purpose
The Complaint Review Panel exists to provide an independent, final review of the handling of a complaint.

It will determine whether the Trust:

- handled the complaint in accordance with this policy;
- acted fairly, reasonably, and proportionately; and
- reached decisions that were justified based on the evidence available at the time.

Scope of the Panel

The panel will consider:

- the original complaint;
- the responses and decisions reached at earlier stages;
- whether investigations were conducted appropriately;
- whether relevant evidence was considered;
- whether decision-making was reasonable and unbiased; and
- whether any procedural failings occurred.

Matters Outside the Panel's Remit

The panel will not:

- reinvestigate the complaint;
- consider new complaints or unrelated matters;
- substitute its own judgement for professional or managerial decisions unless procedural or substantive flaws are identified;
- consider evidence that could reasonably have been provided earlier;
- determine or disclose disciplinary outcomes relating to staff; or
- direct actions beyond the Trust's lawful powers.

Panel Outcomes

The panel may:

- uphold the complaint in whole or in part;
- dismiss the complaint in whole or in part;
- recommend appropriate actions to address identified failings; and/or
- recommend changes to systems or procedures to reduce the risk of recurrence.

Standard of Review

The panel will apply a standard of procedural fairness and reasonableness, taking into account:

- the information available at the time decisions were made;
- the proportionality of actions taken; and
- compliance with this policy and relevant guidance.

Decision and Communication

The Chair of the panel will provide a written decision, including reasons, within 15 school days of the hearing (or such other timeframe as notified where delay is unavoidable).

The decision letter will:

- explain the panel's findings;
- confirm that Stage 4 is the final stage of the Trust's complaints procedure; and
- provide information about referring the complaint to the Department for Education where appropriate.

Finality and Closure
Once the panel has issued its decision:

- the Trust's internal complaints procedure is exhausted; and
- the complaint will be considered formally concluded.

Any further correspondence may be managed in accordance with this policy's provisions relating to:

- duplicate complaints;
- serial or persistent complaints; and
- formal closure where no reasonable or proportionate outcome can be achieved.

Record Keeping and Confidentiality
A written record will be kept of:

- the panel hearing;
- the decision reached; and
- any recommendations made.

Records will be retained confidentially and made available only where required by law, inspection, or regulatory oversight.