 LEO Academy Trust	COMPLAINTS PROCEDURE
Approved by:	CEO
Approved:	Spring 2025
Review:	Spring 2026

Version	Date	Revision Author	Summary of changes - see file/version history for all changes
1	12/2024	DR/SM & Stone King	

We aim to promote staff wellbeing by providing a safe and healthy environment for all employees at work. The Trust is committed to an inclusive environment where everyone feels included, respected and valued.

	Page
1. INTRODUCTION	2
2. LEGISLATION	3
3. DEFINITIONS	3
4. GENERAL PRINCIPLES	3
5. COMPLAINT PROCEDURE FOR PARENTS / CARERS OF CURRENTLY REGISTERED PUPILS IN THE TRUST	6
6. PROTOCOL FOR MANAGING COMPLAINTS ABOUT SCHOOL ACADEMY COMMITTEE MEMBERS AND/OR TRUSTEES/MEMBERS	10
7. CONCERNS OR COMPLAINTS FROM OTHER PERSONS	12
8. FURTHER ACTION	13
9. MANAGING SERIAL AND UNREASONABLE COMPLAINTS	14
10. RECORD KEEPING AND DISCLOSURE	16
11. REPORTING	16
12. CONTACT DETAILS	17
Appendix 1: COMPLAINTS EXCLUDED FROM THIS COMPLAINTS PROCEDURE	18
Appendix 2: FLOWCHART FOR DEALING WITH COMPLAINTS BY PARENTS OR CARERS OF CURRENT PUPILS UNDER THIS PROCEDURE	20
Appendix 3: COMPLAINT FORM	21
Appendix 4: STAGE 4 COMPLAINT PROCESS	23

1. INTRODUCTION

1.1 The Board of Trustees has overall responsibility for this policy. The Board is responsible for the effectiveness of actions taken in response to complaints raised under this policy.

1.2 Within the DfE model complaints procedure the following statements provide differentiation between a concern and a complaint.

A concern is “an expression of worry or doubt over an issue considered to be important for which reassurances are sought”.

A complaint is “an expression or statement of dissatisfaction, however made, about actions taken or lack of action”.

1.3 Often there are opportunities to resolve concerns informally by providing reassurance. For all parties concerned the opportunity to allay a concern informally is usually preferable to the situation escalating to a formal complaint.

1.4 The aim of this policy is to set out the process that will be used to seek a resolution to a complaint in a sympathetic, fair and efficient way and to restore positive relationships and confidence of parents and pupils. In the case of parental complaints, the aim is to arrive at a resolution that is in the best interests of their child whilst taking into account the interests and Special Educational Needs and Disabilities of all children or pupils in the school. The Trust treats all complaints seriously and parents and/or pupils will never be made to feel that raising a concern/complaint will adversely affect the pupil's future at the School or place the pupil at a disadvantage in any way.

1.5 Concerns and complaints should not be raised directly with Academy Committee members or Trustees. If this happens, they will refer the complainant to this Complaints Policy and Procedure and alert the Compliance Team. Prior direct involvement of an Academy Committee member or Trustee will preclude them from being involved as a panel member at stage four of this complaints process as detailed below.

1.6 The rules of natural justice relate to fairness and apply to this Complaints Procedure. The Trust will ensure that all concerns, difficulties or complaints are dealt with in accordance with the following principles:

- All parties will be provided with all information and documentation pertinent to the matters raised subject to data protection and confidentiality obligations
- All parties will be given the opportunity to prepare and present their case and respond to the other parties involved
- All persons investigating and making decisions in relation to the matters raised will be impartial and will do so without bias (or apparent bias) to any party involved
- All decisions made will only be made on a balanced and considered assessment of the information before them
- All decisions made will be based upon logical conclusions, and not based on mere speculation or suspicion
- All decisions made will be supported by detailed reasons which will be disclosed to all parties involved subject to data protection and confidentiality obligations

1.6 This policy does not apply to complaints of the types set out in Appendix 1. Separate policies exist for dealing with such complaints, as set out more fully in that Appendix.

2. LEGISLATION

2.1. The School is an academy and is therefore governed by the Education (Independent School Standards) Regulations 2014 (as amended) ("the Regulations").

2.2. This Complaints Policy has been formulated to comply with Schedule 1, Part 7 of the Regulations (as well as equality legislation and the rules of natural justice). In the case of any variance between the procedure outlined in this Complaints Policy and the Regulations, the procedure outlined in the Regulations will apply.

2.3. This Complaints Policy has been formulated with regard to the Department for Education's best practice guidance for academies complaints procedures.

3. DEFINITIONS

Term	Definition
A Concern	May be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'.
A Complaint	May be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action'.
Central Staff	Members of staff employed by the Trust to perform a role which is Trust-wide and not specific to one School. Central Staff includes the Trust's leadership, including the Chief Executive Officer.
Compliance Team	The Team responsible for managing complaints at Stage 3 and 4 and for collating information on a Trust-wide basis. Their contact details are in Section 12.
Headteacher/Principal	The individual appointed for the time being to be in direct charge of education provision at the School, including but not limited to the Headteacher/Principal, or equivalent.
Parent	A parent, carer or other individual with parental responsibility for a current or former pupil at the School.
School	The LEO School the complaint refers to.
School Day	A day during term time when the School is open for pupils.
Academy Committee	The local governing body of the School.
Pupil	A child/pupil who attends the School.
The Trust	LEO Academy Trust
Trustee	A trustee of LEO Academy Trust

4. GENERAL PRINCIPLES

4.1 Who can make a complaint?

This complaints procedure is not limited to parents or carers of children who are registered at one of the Schools (see section 5). Any other person, including members of the public, may

make a complaint to a School, or to the Trust, about any provision of facilities or services (see section 7). Some complaints are handled under separate procedures (please see exceptions in Appendix 1).

4.2 Timescales

It is in the interests of all parties that concerns are raised as soon as they occur. A Concern should be raised within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents.

Where a Complaint is received after that time, the Trust will take any exceptional circumstances into account before deciding whether to investigate the Complaint.

Complaints made outside term time will be deemed to have been received on the first School Day after the holiday period.

If Parents make a Complaint after their child has left the School, their Complaint will be dealt with in line with the procedures listed section 7.

4.3 Communication

Throughout this policy, where communication is to be made in writing, this shall include email.

4.4 Respect

The Trust's aim is to build a positive relationship between Parents, the School and the staff; this relationship should be based on mutual respect and an understanding that all parties have the Pupil's best interests at heart. This is the basis on which all schools operate and is another key principle of these procedures.

4.5 Mediation

The School and/or the Trust may, if they feel it would be beneficial, suggest mediation at any stage of the complaints procedure. Mediation can provide a helpful mechanism for discussion when a complaint is raised and can help to rebuild the relationship between the parties.

4.6 The participation of Pupils in the complaints process

Extra care will be taken to consider the vulnerability of children where they are involved in the complaints process. If the attendance of any Pupils is necessary at a panel hearing, parental permission will be sought if the Pupil is under the age of 18.

4.7 Staff disciplinary matters

The investigation of a complaint is separate to staff disciplinary matters. During the complaints process, if it is concluded that disciplinary procedures should be initiated, this will be taken forwards as a separate action. Decisions regarding staff disciplinary matters and/or the disciplining of Academy Committee members or Trustees fall outside of the scope of this procedure. Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint, in order to comply with data protection legislation. However, the complainant will be notified that the matter is being addressed.

4.8 Confidentiality

Confidentiality will be maintained at all times by all concerned. All documents associated with any Complaints will be kept confidential unless disclosure is required as per section 10.3. All conversations and correspondence must be treated with discretion. However, complainants will need to accept that some sharing of information within the School will be inevitable if the

complaint is to be investigated fully and fairly. This will be done sensitively and will take privacy into account.

4.9 Legal representation

As this complaints procedure is not a legal process, it is not intended that any party has legal representation.

4.10 Deviation

Normally each stage of the complaint procedure must be completed before proceeding to the next stage.

There may be occasions when it is necessary or reasonable to deviate from the published complaints procedure. In these cases, the complainant will be kept informed and the reasons for the deviation given.

4.11 Anonymous complaints

Anonymous complaints, whilst difficult to manage and resolve, will be recorded and referred to the Headteacher/Principal or Compliance Team. The fact that a Complaint is from an anonymous source should not in itself justify a decision not to investigate the matter. Where an anonymous complaint is received, the School/Trust will use its reasonable endeavours to consider the complaint as best as it reasonably can. However it will not be required to consider the complaint pursuant to any specific process and will handle anonymous complaints on a case by case basis. The fact that a Complaint is from an anonymous source would not rule out referral to other procedures as appropriate, e.g. child protection.

4.12 Withdrawal of a complaint

If a complainant wants to withdraw their Complaint, they will be asked to confirm this in writing.

4.13 Financial compensation

Financial compensation is not a possible outcome of this complaints process.

5. COMPLAINT PROCEDURE FOR PARENTS / CARERS OF CURRENTLY REGISTERED PUPILS IN THE TRUST

5.1 Stage One – Concern discussion

5.1.1 Who

Most Concerns can be dealt with informally and the best person to speak to will be the member of staff who will have the best understanding of the situation. For example, a concern regarding homework, or a child's friendship with another child in their class, could be raised with the class teacher. The school office can be contacted for advice.

5.1.2 How

Informally, in person or by phone, or in writing within three months. This should be done in private, to allow for confidentiality to be maintained and to give the staff member an opportunity to clarify the nature of the Concern.

5.1.3 Action taken

If it is possible, a verbal response will be provided straight away. In more complex matters, time to investigate may be required and the complainant will be informed of the outcome within 10 School Days. A written response will only be provided if it is necessary for clarity.

5.1.4 When

Stage 1: Concern discussion	Raise a Concern: within three months of the incident to which the concern relates.
	Respond to a Concern: within 10 School Days of the concern being raised.
	Escalate an unsatisfactory response: within 5 School Days of the response being received.

5.2 Stage Two – Formal Investigation

5.2.1 Who

If the response to the Stage 1 Concern is considered unsatisfactory by the complainant, the Head Teacher/Principal should be informed, in writing, within 5 School Days of the request to escalate the Concern to Stage 2. The Headteacher/Principal will either investigate or delegate the investigation to another member of the school's senior leadership team but not the decision to be taken regarding whether the complaint is upheld or not.

If the complaint is about the Head Teacher/Principal or a member of the Central Team, including the CEO, or a service provided by the central team, the Compliance Team should be informed and an appropriate investigator will be appointed by the Compliance Team to carry out the investigation at Stage 2. If the complaint is about the Compliance Team, the Chief Operations Officer (COO) should be informed. For complaints about Academy Committee members or Trustees/Members refer to Section 6.

5.2.2 How

The Complaints form in appendix 3 of this policy should be completed and submitted with the request to escalate, with clear information about the actions that have or have not been taken which have led to the Complaint, why the Stage 1 actions did not resolve the complaint and how the complaint could be resolved.

5.2.3 Action taken

The stage 2 investigator will normally ask to meet with the complainant to discuss their Complaint and obtain further information. The stage 2 investigator will also meet with relevant staff to investigate the matter further if appropriate. A written response will be provided, confirming whether the complaint was upheld and the reasons why within 25 School Days of the request to escalate being received. Actions the School will take to resolve the complaint may also be included, if appropriate.

5.2.4 When

Stage 2: Formal investigation	Escalate to Stage 2: within 5 School Days of the Stage 1 response being received.
	Acknowledge receipt of Stage 2 escalation: within 5 School Days of the escalation being received.
	Provide a written response at Stage 2: within 25 School Days of the request to escalate being received.
	Escalate an unsatisfactory response at Stage 2: within 5 School Days of the Stage 2 response being received.

5.3 Stage Three – Investigation by a nominated Senior Trust Leader

5.3.1 Who

If the response to the Stage 2 Complaint is considered unsatisfactory by the complainant, the Compliance Team should be informed, in writing, of the escalation of the complaint to Stage 3 within 5 School Days.

5.3.2 How

The Complaint form in appendix 3 of this policy should be updated, with clear information about why the outcome of the Stage 2 investigation is unsatisfactory.

5.3.3 Action taken

The purpose of the Stage 3 investigation is to review how the School/Trust has dealt with the complaint and the conclusions reached, including whether the actions from previous stages have been adequately implemented.

The Compliance Team will decide who will investigate the complaint at Stage 3. They will investigate the situation and make recommendations to the School. To provide impartiality, any investigator appointed will be independent of the running of the School. The Trust may engage an independent, external person where the complaint is particularly complex or involves legal issues.

The investigator will normally ask to meet with the complainant to discuss their Complaint and obtain further information. The investigator will also meet with relevant staff to investigate the matter further. A written response will be provided, including a full explanation of the decision and the reasons for it within 25 School Days of the request to escalate being received. Actions the School/Trust will take to resolve the complaint may also be included, if appropriate.

5.3.4 When

Stage 3: Investigation by Senior Trust Leader	Escalate to Stage 3: within 5 School Days of the Stage 2 response being received.
	Acknowledge receipt of Stage 3 escalation: within 5 School Days of the escalation being received.
	Provide a written response at Stage 3: within 25 School Days of the request to escalate being received.
	Escalate an unsatisfactory response at Stage 3: within 5 School Days of the Stage 3 response being received.

5.4 Stage Four - Consideration of the complaint by a Review Panel

5.4.1 Who

If the response to the Stage 3 complaint is considered unsatisfactory by the complainant, the Compliance Team should be informed, in writing, within 5 School Days, of the request to escalate the complaint to Stage 4.

5.4.2 How

The Complaint form in appendix 3 of this policy should be updated and submitted with the request to escalate, with clear information about why the outcome of the Stage 3 investigation is unsatisfactory and what action could resolve the complaint.

5.4.3 Action taken

The purpose of Stage 4 is to review how the School / Trust has dealt with the complaint and the conclusions reached, including whether the actions from previous stages have been adequately implemented. A panel will be convened to hear the complaint at a meeting that the Complainant and the School will be invited to attend.

The panel will consist of three members, one of whom will be an independent member. This person will not be associated with the management or running of the School in any way; they may be an Academy Committee member or Principal of another school in the Trust. All three panel members will have no prior involvement in the matter.

The details of the panel meeting will be sent to the complainant within 15 School Days of the request to escalate in a letter that fully explains the rights and obligations associated with the complaints process. Both the Complainant and the School will be given the opportunity to submit additional documents in advance of the meeting and will have the opportunity to make representations and ask questions at the meeting. Please see Appendix 4 for details of how the Stage 4 panel will operate.

After the meeting a copy of the panel's findings and recommendations will be provided to the complainant within 10 School Days.

5.4.4 When

Stage 4: Panel hearing	Escalate to Stage 4: within 5 School Days of the Stage 3 response being received.
	Acknowledge receipt of Stage 4 escalation: within 5 School Days of the escalation being received.
	Confirm meeting date and details of panel: within 15 School Days of the escalation being received.
	Submit additional documents: at least 8 School Days before the panel date.
	Circulate meeting papers: at least 5 School Days before the panel date.
	Hold Panel meeting: within 30 School Days of the escalation being received.
	Provide written response of the Panel: within 10 School Days of the Panel meeting.

6. PROTOCOL FOR MANAGING COMPLAINTS ABOUT SCHOOL ACADEMY COMMITTEE MEMBERS AND/OR TRUSTEES/MEMBERS

- 6.1** The same good practice principles set out in this policy, also apply to the management of complaints about individual Academy Committee members or Trustees/Members. A **two-stage** procedure is used to deal with these complaints.
- 6.2** The Chair of the Academy Committee would manage complaints about one of its Academy Committee members, or, in the event of the complaint being about the Chair, by the Chair of a different Academy Committee, or a Trustee.
- 6.3** The Chair of the Trust would manage complaints about a Trustee, or, in the event of the complaint being about the Chair, by the Vice Chair.
- 6.4** The Members would manage complaints about another Member or the trust may engage an independent, external person where the complaint is particularly complex or involves legal issues.
- 6.5** The investigator must be impartial, objective and rigorous in their investigation of complaints about a fellow Academy Committee member/Trustee/Member and demonstrate this to be the case. It is important that detailed notes are kept and timescales are adhered to.

6.6 Stage One – Investigation by a nominated Academy Committee Chair or Trustee/Member

6.6.1 Who

The complainant should present their complaint in writing to the Compliance Team within three months. The Compliance Team will acknowledge the complaint within 5 School Days and decide who will investigate the Complaint.

6.6.2 How

The Complaints form in appendix 3 of this policy should be completed, with clear information about the actions that have or have not been taken which have led to the complaint and what action might be taken to resolve the complaint.

6.6.3 Action taken

The investigator will normally offer to meet with the complainant to clarify aspects of their concern and to seek further information before embarking on an investigation, and meeting notes may be taken.

The investigator will report their findings and any recommendations to the complainant in writing (and verbally if they feel this is necessary) within 20 School Days of the complaint being acknowledged.

6.6.4 When

Stage 1: Investigation by appointed person	Raise a complaint: within three months of the incident to which the complaint relates.
	Acknowledge receipt of complaint: within 5 School Days of the complaint being received.

	Provide a written response: within 20 School Days of the acknowledgement of the complaint.
	Escalate an unsatisfactory response: within five School Days of the complaint response being received.

6.7 Stage 2 – Consideration of the complaint by a Review Panel

6.7.1 Who

If the response to the Stage 1 investigation is considered unsatisfactory by the complainant, the Compliance Team should be informed, in writing, within 5 School Days, of the request to escalate the complaint to Stage 2.

6.7.2 How

The Complaint form in appendix 3 of this policy should be updated and submitted with the request to escalate, with clear information about why the outcome of the Stage 1 investigation is unsatisfactory and what action might resolve the complaint.

6.7.3 Action taken

The purpose of the Stage 2 panel is to review how the Stage 1 investigation has dealt with the complaint and the conclusions reached, including whether any actions have been adequately implemented. A panel will be convened to hear the complaint at a meeting that both parties will be invited to attend.

The panel will consist of three members, all of whom will have no prior involvement in the matter. If the complaint relates to a particular School within the Trust, at least one member of the panel will not be associated with the management or running of the School in any way; they may be an Academy Committee member or Principal of another school in the Trust.

The details of the panel meeting will be sent to the complainant in a letter within 15 School Days of the request to escalate being received that fully explains the rights and obligations associated with the complaints process. Both the Complainant and the School will be given the opportunity to submit additional documents in advance of the meeting and will have the opportunity to make representations and ask questions at the meeting. Please see Appendix 4 for details of how the Stage 2 panel will operate.

After the meeting a copy of the panel's findings and recommendations will be provided to the complainant within 10 School Days.

6.7.4 When

Stage 2: Panel hearing	Escalate to Stage 2: within 5 School Days of the Stage 1 response being received.
	Acknowledge receipt of Stage 2 escalation: within 5 School Days of the escalation being received.
	Confirm meeting date and details of panel: within 15 School Days of the escalation being received.
	Submit additional documents: at least 8 School Days before the panel date.

	Circulate meeting papers: at least 5 School Days before the panel date.
	Hold Panel meeting: within 30 School Days of the escalation being received.
	Provide written response of the Panel: within 10 School Days of the Panel meeting.

7. CONCERNS OR COMPLAINTS FROM OTHER PERSONS

The process described in section 5 of this complaints policy applies only to Complaints made by Parents or carers of current pupils. However, the Trust wishes to work closely with other members of the local community and will deal with concerns and complaints from members of the public (which includes parents or carers of prospective or former pupils) as follows:

7.1 Stage 1 – Concern

A concern regarding a School or its operations may be made to any member of staff. That member of staff will attempt to resolve the matter immediately or may, if appropriate, refer the matter to their line manager or member of the senior leadership team (SLT) or Central team who is best placed to deal with the concern. It is expected that most concerns will be responded to orally or in writing within five school days. If a longer period is required, you will be kept informed of the progress of the investigation.

7.2 Stage 2 – Formal investigation

Where a Concern is not resolved at Stage 1, or the complainant wishes their Concerns to be dealt with immediately as a formal Complaint, the complainant should put the complaint in writing and send it to the compliance team. The compliance team may delegate the task of investigation and/or responding to the complaint to a member of SLT or a Senior Trust Leader. A formal response to the complaint will usually be provided within 20 School Days of receipt of the letter of complaint although if a longer period is required to respond, the complainant will be kept updated.

8. FURTHER ACTION

- 8.1 If the complainant believes the School or Trust did not handle their complaint in accordance with the published Complaints Procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the DfE once the complaint process is complete.
- 8.2 The DfE will not normally reinvestigate the substance of complaints or overturn any decisions made by the School or Trust. They will consider whether the School/Trust has adhered to education legislation and this published Complaints Policy and Procedure and whether they have followed Part 7 of the Education (Independent School Standards) Regulations 2014.
- 8.3 The complainant can refer their complaint to the DfE online via [this webpage](#), by telephone on: 0370 000 2288 or by writing to:

Department for Education
School complaints compliance unit
Piccadilly Gate
Store Street
Manchester
M1 2WD

9. MANAGING SERIAL AND UNREASONABLE COMPLAINTS

9.1. Repetitious, including serial and/or persistent complaints

Where a complainant seeks to raise a complaint that is the same, similar to or based on the same facts of a complaint which has already been considered under this procedure (including a complaint raised by a spouse, partner or other family member about the same subject) and every reasonable step to address the complainant's concerns has been taken, the Compliance Team will write to the complainant to advise that the complaints procedure on this matter has been exhausted, the local process is complete and further correspondence on the same matter will not be responded to. Any new ground of complaint identified will be investigated under the complaint procedure as a new complaint.

9.2. Vexatious Complaints

The DfE best practice guidance for academies complaints processes defines the characteristics of a 'frivolous' or 'vexatious' complaint as:

- complaints which are obsessive, persistent, harassing, prolific or repetitious;
- insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;
- insistence upon pursuing meritorious complaints in an unreasonable manner;
- complaints which are designed to cause disruption or annoyance;
- demands for redress that lack any serious purpose or value.

Examples of such behaviour include but are not limited to:

- refusal to articulate the complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;
- refusal to co-operate with the complaints investigation process;
- refusal to accept that certain issues are not within the scope of the complaints procedure;
- insistence on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice;
- introducing trivial or irrelevant information which the complainant expect to be taken into account and commented on;
- raising large numbers of detailed but unimportant questions, and insisting they are fully answered, often immediately and to the complainant's own timescales;
- making unjustified complaints about staff who are trying to deal with the issues, and seeking to have them replaced;
- changing the basis of the complaint as the investigation proceeds;
- seeking an unrealistic outcome, such as the inappropriate dismissal of staff;
- making excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with;
- knowingly providing falsified information;
- publishing unacceptable information on social media or other public forum;
- where an otherwise reasonable complaint is pursued by the complainant using behaviour or language towards staff, Academy Committee members, or Trustees which is aggressive, abusive, offensive, discriminatory or threatening or insulting personal comments are made about, or threats are made towards, staff.

9.3 Procedure

9.3.1 Only the CEO may deem a complaint 'repetitious / vexatious'.

9.3.2 The Headteacher/Principal will ensure that there is sufficient evidence presented to the CEO to justify the request to declare the complaint repetitious / vexatious.

9.3.3 The Compliance team on behalf of the CEO, will write to the complainant to explain the decision and the way that future correspondence will be dealt with. Any restrictions imposed will be appropriate and proportionate.

9.3.4 The CEO may:

- inform the complainant that their complaint is considered to be vexatious which may be because the manner in which they are pursuing their complaint is unreasonable and ask them to desist;
- inform the complainant that threatening, aggressive or other inappropriate conduct during the Stage 4 panel meeting will result in the complainant being asked to leave the meeting which will continue in their absence;
- refuse to consider the Complaint any further and refer the complainant directly to the ESFA.

9.3.5 Some or all of the following actions may be taken, depending on the particular circumstances of the case:

- Requiring that no member of staff should meet the complainant on their own;
- Restricting responses to telephone calls and emails from the complainant to specified days and times, and/or to specified individuals;
- Requiring that all future contacts with the School/Trust are in writing, except in emergencies;
- Not responding or merely acknowledging correspondence from the complainant that raises issues that have already been dealt with;
- Banning the complainant from the School/Trust premises where the complainant's behaviour or language is aggressive, abusive or insulting to the extent that it is considered to constitute a risk to pupils or staff, with any appointments with staff to be agreed in writing via the Head Teacher/Principal.

9.3.6 New Complaints from people who have raised serial or unreasonable complaints in the past will be treated as new complaints and addressed on their merits in line with the Complaints Policy.

9.3.7 If a complaint is deemed to be serial or unreasonable this will not reflect on the School's treatment of the complainant's child.

9.4 Complaint Campaigns

A complaint campaign involves the School and/or Trust receiving a large volume of Complaints which are all based on the same subject whether or not they are from complainants unconnected with the School. In such circumstances, the School will conduct a single investigation of the issue and then will respond via:

- A template response to all complainants and/or
- Publishing a single response on the School's website

10. RECORD KEEPING AND DISCLOSURE

10.1 Data protection

The Trust is mindful of the Data Protection Act and the UK General Data Protection Regulations (GDPR). Schools are not allowed to disclose personal information relating to third parties, i.e. other Pupils, other Parents, staff etc without a lawful basis for doing so.

10.2 Written Records

A record will be kept of all written formal Complaints, including at what stage they were resolved and action taken by the Trust / School due to those complaints regardless of whether they were upheld. Written records will be kept in the form of:

- Notes of investigations carried out;
- Notes of meetings with complainants;
- Formal written responses to complainants at each stage;
- Minutes of panel meetings;
- A record of actions taken as a result of Complaints.

Such records will be kept in accordance with the Trust's Data Retention Policy.

10.3 Disclosure

Correspondence, statements and records relating to individual Complaints will be kept confidential except where:

- access is requested by the Secretary of State;
- disclosure is required in the course of a School inspection;
- an individual exercises their legal right to access their own personal data contained within such documentation;
- under other legal authority.

10.4 Recording meetings

Recordings of meetings may not be made without prior agreement of all parties concerned.

Any audio or video recordings made covertly and/or without the informed consent of all parties present will not be accepted as evidence in any stage of the complaints procedure. For the avoidance of doubt, LEO Academy Trust does not consent to any covert recordings being disclosed to other parties.

11. REPORTING

The Compliance Team must ensure this policy and procedure is published to Parents and others. The Trust's complaint procedure is available on the Trust website, each Academy website or a copy can be obtained from the School office.

12. CONTACT DETAILS

The Compliance Team can be contacted by email at complaints@leoacademytrust.co.uk or by post: Compliance Team, LEO Academy Trust, 314 Malden Road, Cheam, Surrey SM3 8EP

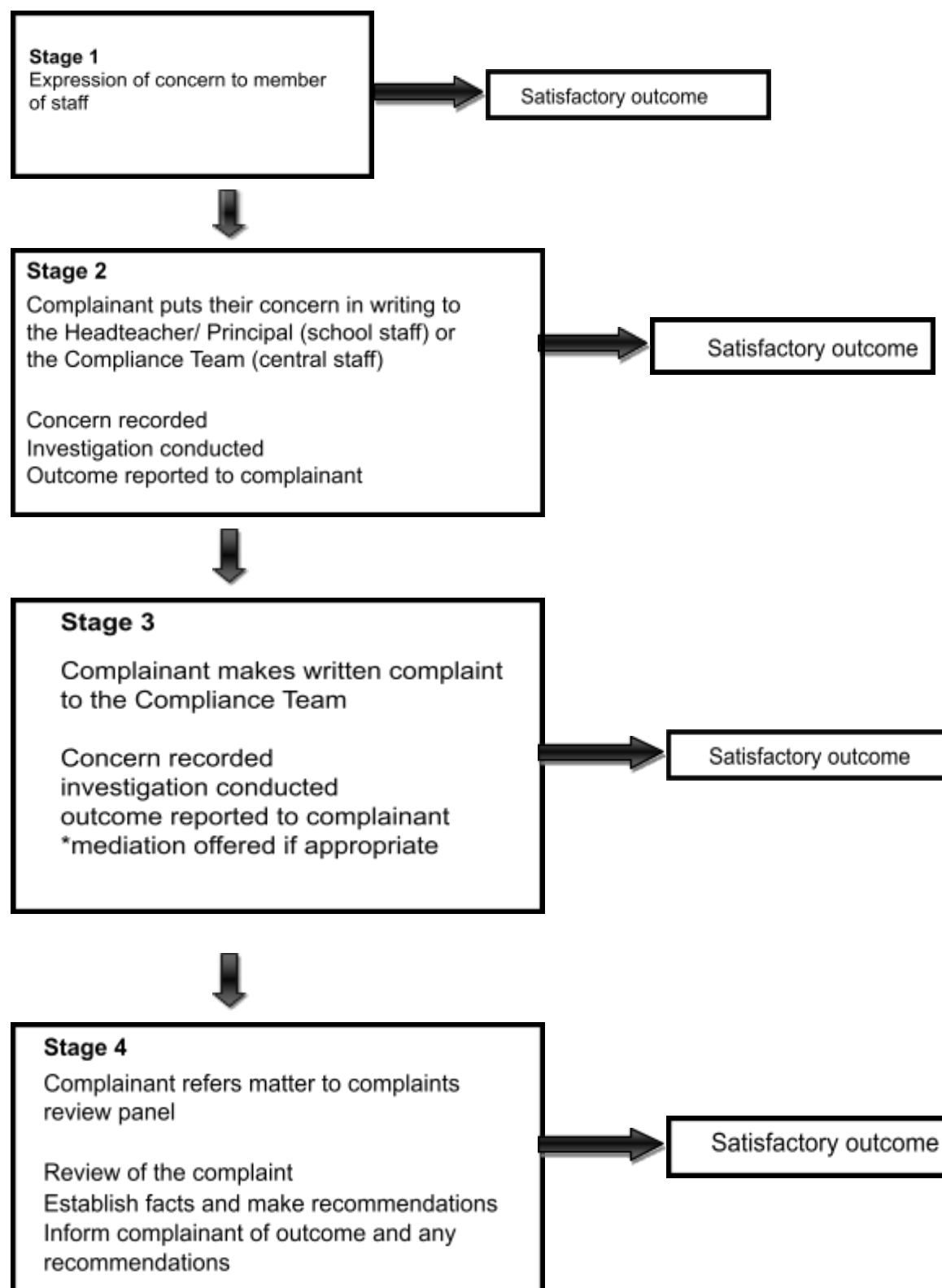
Appendix 1: COMPLAINTS EXCLUDED FROM THIS COMPLAINTS PROCEDURE

The types of complaint set out below are subject to other statutory procedures that are separate from this complaints procedure:

Exceptions	Who to contact
Statutory assessments of Special Educational Needs	Concerns about statutory assessments of Special Educational Needs and the content of any resulting statutory plans should be raised with the relevant Local Authority. General concerns about SEND support at the School may be raised under this policy.
Matters likely to require a Child Protection Investigation	Complaints about child protection matters are handled under the child protection and safeguarding policy and in accordance with relevant statutory guidance. If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH).
Exclusion of children from school	To appeal or make representations about an exclusion please refer to the Trust's Behaviour Policy. Further information about raising concerns about exclusions can be found at: Behaviour in schools: sanctions and exclusions Complaints about the application of the behaviour policy can be made through the school's complaints procedure.
Admissions	Right of appeal to an independent panel if admission is refused. For further information, see the Trust's Admissions policy.
Whistleblowing	We have an internal whistleblowing procedure for all our employees, including volunteers, temporary staff and contractors. The policy can be found on the safeguarding page on each school's website. The Secretary of State for Education is the prescribed person for matters relating to education for whistle-blowers in education who do not want to raise matters direct with their employer. Referrals can be made at: www.education.gov.uk/contactus .
Staff grievances	Complaints from staff will be dealt with under the Trust's internal grievance procedures.
Staff conduct	Complaints can be raised about staff conduct under this Complaints Policy, however, such complaints may be dealt with under the Trust's internal disciplinary procedures. Complainants will not be informed of any disciplinary action taken against a staff member due to a complaint. However, the complainant will be notified that the matter is being addressed.
Complaints about services provided by other providers who may use school premises or facilities	The Trust will not investigate complaints about services provided by other providers who may use academy premises or facilities. These organisations will have their own complaints procedures and should be contacted directly. However, if there are any safeguarding concerns linked to any external agencies hiring our

	facilities please report these directly to the hirer and also to the academy's Safeguarding Lead – contact details are available in the relevant academy's Child Protection and Safeguarding Policy & Procedure.
National Curriculum - content	Please contact the Department for Education at: www.education.gov.uk/contactus

Appendix 2: FLOWCHART FOR DEALING WITH COMPLAINTS BY PARENTS OR CARERS OF CURRENT PUPILS UNDER THIS PROCEDURE



Appendix 3: COMPLAINT FORM

Your Name:	
Your Address and Postcode:	
Your Contact Telephone Number:	
Your Relationship to the Child:	
Child's Name:	
Child's Date of Birth:	
Child's Class:	
Child's School:	
Do you have parental responsibility for the Child?	YES / NO
Full details of complaint (including the names of all persons involved and the dates of incidents referred to):	
What action, if any, have you already taken to try and resolve your complaint (for example, who did you speak to and what was the response)?	

What actions do you feel might resolve the problem at this stage?	
Are you attaching any paperwork? If so, please provide details.	
Signature/e-signature	
Date	
Your email address	

Appendix 4: STAGE 4 COMPLAINT PROCESS

- 1 The Compliance Team will write to acknowledge receipt of the written request within 5 School Days. Following assessment of the escalation request, the Compliance Team informs the complainant that a three-member panel will investigate the complaint within 30 School Days of receiving the request. If this is not possible, the Compliance Team will provide an anticipated date and keep the complainant informed.
- 2 The communication will also explain that the complainant and the Stage 3 investigator have the right to submit any additional documents relevant to the complaint that have not already been collated as part of the Stage 2 and 3 investigations. All parties should send the additional documentation to the Compliance Team at least 8 School Days before the panel meeting. All parties involved should receive any relevant documents at least 5 School Days prior to the panel meeting. Only in exceptional circumstances will new evidence be accepted after this time and this is at the discretion of the Chair of the Review Panel.
- 3 If, despite best efforts, it is not possible to find a mutually convenient date and time for a hearing within a reasonable timeframe, the Compliance team may determine that the hearing proceeds in the absence of one or more parties on the basis of their written submissions. This will involve detailed consideration of all the written evidence by the panel but will not require attendance of the complainant, or the School/Trust representatives.
- 4 Complainants may, if they wish, be accompanied to any such meeting by a friend, relative, or interpreter. You should notify the Compliance team in advance if you intend to bring anyone to the hearing. We do not encourage either party to bring legal representatives to the Stage 4 review. Representatives from the media are not permitted to attend.
- 5 The Compliance Team will convene the meeting for the Stage 4 review and will distribute all the paperwork. This is likely to contain personal data and therefore care will be taken in undertaking this distribution. The panel will elect a Chair for the meeting.
- 6 The aim of the meeting will be to review how the School/Trust has managed the complaint, the conclusions reached in previous stages and, if possible, to achieve reconciliation between you and the School/Trust. However, it has to be recognised that sometimes it may only be possible to establish facts and make recommendations as to future action in order to satisfy a complainant that their complaint has been taken seriously.
- 7 At the conclusion of the meeting the Chair should explain that the panel would consider its decision and write to all parties with the decision of the panel within 10 School Days.
- 8 A written statement outlining the findings and recommendations of the panel will be sent to the complainant, and the Stage 3 investigator, plus where applicable any individual who was the subject of the complaint. If any disciplinary action is to be taken against a member of staff or pupil then, to protect their rights, only the phrase “appropriate action has or will be taken” will be used.
- 9 The findings and recommendations of the panel will be available for inspection on Trust premises by the Trustees and the Headteacher/Principal.