

# **Policy and Procedure**

# **Complaints Policy 2025**

Reviewed and approved by:

**Trust Board** 

**Approval Date:** 

15<sup>th</sup> May 2025

**Review Date:** 

May 2027

Version:

1



## TRUST COMPLAINTS PROCEDURE

## Introduction

Introduction The Blessed Christopher Wharton Catholic Academy Trust is under a duty to comply with the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014. This Complaints Procedure is based on guidance published by the Education & Skills Funding Agency (ESFA).

This procedure will apply to most general complaints received by the academy/Trust. However, some complaints are subject to separate statutory procedures, for example issues concerning admission appeals, exclusion appeals, decisions about a child's statutory assessment of special educational needs or grievances by staff. These are the subject of separate complaints procedures which are outlined in relevant policies and can be obtained from the academy/Trust.

In many cases, complaints will be lodged against a specific academy and will be dealt with by the academy/Academy Council as appropriate. This complaints procedure has been written to guide complainants who are making complaints against academies.

A complainant may wish to raise a complaint against the Trust Central Team or Trust Board. Whilst the principle of the complaint procedure remains unchanged, the people investigating will differ for complaints against the Trust Central Team or Trust Board.

### **Contents**

1. AIMS	
2. Legislation and guidance	3
3. Scope	
4. Roles and responsibilities	4
5. Principles for investigation	5
6. Stages of complaint (not complaints against the headteacher or governors)	5
7. Complaints against the Headteacher, a Governor or the Governing Board	8
8. Complaints against the Trust Central Team or Trust Board	10
COMPLAINTS AGAINST THE TRUST CENTRAL TEAM OR TRUST BOARD	10
9. Referring complaints on completion of the school's procedure	11
10. Unreasonable and persistent complaints	12
10.5 Vexatious Complaints	14
11. Record keeping and confidentiality	15
12. Learning lessons	15
13. Monitoring arrangements	15
14. Links with other policies	16

## 1. Aims



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

When responding to complaints, we aim to:

- > Be impartial and non-adversarial
- > Facilitate a full and fair investigation by an independent person or panel, where necessary
- > Address all the points at issue and provide an effective and prompt response
- > Respect complainants' desire for confidentiality
- > Treat complainants with respect and courtesy
- > Make sure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- > Keep complainants informed of the progress of the complaints process
- > Consider how the complaint can feed into school improvement evaluation processes

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

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

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

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

## 2. Legislation and guidance

This document meets the requirements set out in part 7 of the schedule to the <u>Education (Independent School Standards)</u> Regulations 2014, which states that we must have and make available a written procedure to deal with complaints from parents/carers of pupils at the school.

It is also based on <u>best practice guidance for academies complaints procedures</u> published by the Education and Skills Funding Agency (ESFA).

This policy complies with our funding agreement and articles of association.

In addition, it addresses duties set out in the <u>Early Years Foundation Stage statutory framework</u> with regards to dealing with complaints about the school's fulfilment of Early Years Foundation Stage (EYFS) requirements.

# 3. Scope

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

- > Admissions
- > Parents. Visitors & Carers Code of Conduct
- > Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- > Suspension and permanent exclusion
- > Whistleblowing
- > Staff grievances



#### > Staff discipline

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

> Complaints about services provided by other providers who use school premises or facilities should be directed to the provider concerned.

## 4. Roles and responsibilities

## 4.1 The complainant

The complainant will get a more effective and timely response to their complaint if they:

- > Follow these procedures
- > Co-operate with the school throughout the process, and respond to deadlines and communication promptly
- > Ask for assistance as needed
- > Treat all those involved with respect
- > Do not approach individual governors about the complaint
- > Do not publish details about the complaint on social media

## 4.2 The investigator

An individual will be appointed to investigate the complaint and establish the facts. They will:

- > Interview all relevant parties, keeping notes
- > Consider records and any written evidence and keep these securely
- > Prepare a comprehensive report to the headteacher or complaints committee, which includes the facts and potential solutions

#### 4.3 The complaints co-ordinator

The complaints co-ordinator can be:

- > The headteacher
- > The designated complaints governor
- > Any other staff member providing administrative support

The complaints co-ordinator will:

- > Keep the complainant up to date at each stage in the procedure
- ➤ Make sure the process runs smoothly by liaising with staff members, the headteacher, chair of governors, and clerk
- > Be aware of issues relating to:
- > Sharing third-party information
- ➤ Additional support needed by complainants; for example, interpretation support or where the complainant is a child or young person
- > Keep records

#### 4.4 Governance Administrator/ Clerk



- > Be the contact point for the complainant and the complaints committee, including circulating the relevant papers and evidence before complaints committee meetings
- > Arrange the complaints hearing
- > Record and circulate the minutes and outcome of the hearing

#### 4.5 Committee chair

The committee chair will:

- > Chair the meeting, ensuring that everyone is treated with respect throughout
- > Make sure all parties see the relevant information, understand the purpose of the committee, and are allowed to present their case

## 5. Principles for investigation

When investigating a complaint, we will try to clarify:

- > What has happened
- > Who was involved
- > What the complainant feels would put things right

### 5.1 Timescales

The complainant must raise the complaint within 3 months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within 3 months of the last incident.

We will consider exceptions to this timeframe in circumstances where there were valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved.

When complaints are made out of term time, we will consider them to have been received on the first school day after the holiday period.

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

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

#### 5.2 Complaints about our fulfilment of early years requirements

We will investigate all written complaints relating to the school's fulfilment of the Early Years Foundation Stage (EYFS) requirements and notify the complainant of the outcome within 28 days of receiving the complaint. The school will keep a record of the complaint (see section 10) and make this available to Ofsted on request.

Parents and carers can notify Ofsted if they believe that the school is not meeting Early Years Foundation Stage requirements, by:

- > Calling 0300 123 4666
- Emailing enquiries@ofsted.gov.uk
- ➤ Using the online contact form available at <a href="https://www.gov.uk/government/organisations/ofsted#org-contacts">https://www.gov.uk/government/organisations/ofsted#org-contacts</a>

We will notify parents and carers if we become aware that the school is to be inspected by Ofsted. We will also supply a copy of the inspection report to parents and carers of children attending the setting on a regular basis

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



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

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

## 6.1 Stage 1: informal

Our Schools take informal complaints seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.

The complainant should raise the complaint as soon as possible within the timescales set out in section 5.1.

The complaint should be addressed to the relevant member of school staff or the headteacher, either in person or by letter, telephone or email. If the complainant is unclear who to contact or how to contact them, they should contact the school office.

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

The informal stage will involve a meeting between the complainant and the Headteacher or nominated person. A written response will be provided by the school within 10 school days following the informal meeting.

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

## 6.2 Stage 2: formal

The formal stage involves the complainant putting the complaint to the headteacher and/or the subject of the complaint:

- > In a letter or email (this is preferred)
- > Over the phone
- > In person
- > Through a third party acting on their behalf

The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.

If complainants need assistance raising a formal complaint, they can contact the school office.

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

The headteacher (or other person appointed by the headteacher for this purpose) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within 10 school days.

#### How to escalate a complaint

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



Complaints can be escalated by contacting the Governance Administrator: governance@bcwcat.co.uk

- > By letter or email
- > Through a third party acting on behalf of the complainant

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

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

## 6.3 Stage 3: Academy Council review panel

#### Convening the panel

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

The panel will be appointed by, or on behalf of, the proprietor and must consist of at least 3 people who were not directly involved in the matters detailed in the complaint. The panel will have access to the existing record of the complaint's progress (see section 10).

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

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

Any written material will be circulated to all parties at least 7 school days before the date of the meeting.

The board will ensure that the hearing is properly minuted.

#### At the meeting

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

At the review panel meeting, the complainant and representatives from the school, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.

The complainant must be allowed to attend the panel hearing and be accompanied if they wish. We don't encourage either party to bring legal representation but will consider it on a case-by-case basis. For instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by their union.

Representatives from the media are not permitted to attend.

At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called, as appropriate, to present their evidence.

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

The panel will then put together its findings and recommendations from the case. The panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant, the individual who is the subject of the complaint, and make a copy available for inspection by the proprietor and headteacher.

#### The outcome

The committee can:

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



If the complaint is upheld, the committee will:

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

The school will inform those involved of the decision in writing within 10 school days.

#### 6.4 Stage 4: Formal Complaints Panel Hearing

#### **Request for Review**

- If the complainant remains dissatisfied after **Stage 3** (a review by the Trust Board), they can request a further review.
- This request must be made in writing within a specified timeframe (usually 10-20 school days) and should outline the reasons for dissatisfaction.

#### **Independent Panel Appointment**

- The **Trust Board** will convene a **Complaints Panel**, which must include at least **one independent person** (someone not involved in the management or governance of the academy).
- Panel members must have no prior involvement in the complaint to ensure impartiality.

#### **Panel Meeting**

- The panel will review all documentation and may request additional evidence.
- A hearing may be arranged where the complainant and the academy's representatives are invited to present their cases.
- The complainant may bring a companion (e.g., a friend or representative) for support.

#### **Panel Decision**

- After reviewing all information, the panel will reach a decision.
- The panel's outcome will be communicated in writing within a set timeframe (typically **5-10 school days**).
- The decision will be final within the Trust's complaints procedure.

# 7. Complaints against the Headteacher, a Governor or the Governing Board

## 7.1 Stage 1: informal

Complaints made against the headteacher, or any individual member of the governing board (including the chair or vice-chair) should be directed to the Governance Administrator in the first instance.

A suitably skilled and impartial governor will then carry out the steps at stage 1 set out in section 6 above.

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



Complaints about the whole governing board will be resolved at stage 2 below.

#### How to escalate a complaint

Complaints can be escalated by contacting the Governance Administrator at governance@bcwcat.co.uk:

- > By letter or email
- > Through a third party acting on behalf of the complainant

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

## 7.2 Stage 2: formal

Complaints that involve or are about the headteacher should be addressed to the chair of governors, via the school office, marked as private and confidential or emailed to governance@bcwcat.co.uk

Complaints about the chair of governors, any individual governor or the whole governing body should be addressed to the Governance Administrator at <a href="mailto:governance@bcwcat.co.uk">governance@bcwcat.co.uk</a> or a letter to the school office, marked as private and confidential.

Formal complaints can be raised:

- > By letter or email
- > Through a third party acting on behalf of the complainant

## **Stage 3: Formal Complaints Panel Hearing**

#### **Request for Review**

- If the complainant remains dissatisfied after **Stage 3** (a review by the Trust Board), they can request a further review.
- This request must be made in writing within a specified timeframe (usually 10-20 school days) and should outline the reasons for dissatisfaction.

### **Independent Panel Appointment**

- The **Trust Board** will convene a **Complaints Panel**, which must include at least **one independent person** (someone not involved in the management or governance of the academy).
- Panel members must have no prior involvement in the complaint to ensure impartiality.

## **Panel Meeting**

- The panel will review all documentation and may request additional evidence.
- A hearing may be arranged where the complainant and the academy's representatives are invited to present their cases.
- The complainant may bring a companion (e.g., a friend or representative) for support.

#### **Panel Decision**

• After reviewing all information, the panel will reach a decision.



- The panel's outcome will be communicated in writing within a set timeframe (10 school days).
- The decision will be final within the Trust's complaints procedure.

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

If the complaint is:

- > Jointly about the chair and vice-chair or
- > The entire governing board or
- > The majority of the governing board

An independent investigator will carry out the steps in stage 2 set out in section 6 above. They will be appointed by the Blessed Christopher Wharton Trust Board and will write a formal response at the end of their investigation.

The written conclusion of this investigation will be sent to the complainant within 10 school days.

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

The Governance Administrator will acknowledge receipt of the request within 5 school days.

## 7.3 Stage 3: Review panel

If the complaint is about the headteacher or an individual governor, the steps outlined in stage 3 of section 6 above will be followed.

If the complaint is:

- > Jointly about the chair and vice-chair or
- > The entire governing board, or
- > The majority of the governing board

A committee of independent governors will hear the complaint. They will be sourced from local schools, the local authority or diocese and will carry out the steps at stage 3 (set out in section 6 above).

# 8. Complaints against the Trust Central Team or Trust Board

#### COMPLAINTS AGAINST THE TRUST CENTRAL TEAM OR TRUST BOARD

Complaints made against the Trust Central Team or Trust Board follow the same principles and stages of the procedure form complaints against academies. The differences are the people who investigate or hear the complaint.

In reading the above policy and procedure the following should be applied:



Complaints Against the Trust Central Team		Complaints Against the Trust Board	
Complaint Against	Investigated/Decided By	Complaint Against	Investigated/Decided By
Member of staff	Their line manager	A Director	Chair of the Trust Board
Chief Finance Officer	Chief Executive Officer	A Committee Chair	Chair of the Trust Board
Director for Primary Education	Chief Executive Officer	The Chair of the Trust Board	Clerk to the Trust Board liaises with Diocesan Director of Education
Executive Headteacher	Chief Executive Officer	The whole Trust Board	Clerk to the Trust Board liaises with Diocesan Director of Education
Chief Executive Officer	Chair of the Trust Board	A member of the Trust	Clerk to the Trust Board liaises with Diocesan Director of Education

**The Complaints Panel** will be comprised of at least three people. The Complaints Panel will usually be made up of:

- 2 Directors who serve on the Trust Board.
- 1 Independent Person who is not involved with the management or running of the Trust.

The panel cannot be made up solely of Directors because they are not independent of the management and running of the Trust. It is a matter for the Trust to identify suitably independent individuals who can fulfil the role and responsibility of being the independent member.

The independent member of the panel will not be a director or an employee of the Trust. For the avoidance of doubt, a Governor of an academy within the Trust may be the independent member of the panel if they are not an employee of the Trust, and they are sufficiently removed from the management and running of the Trust to be considered truly independent.

# 9. Referring complaints on completion of the school's procedure

If the complainant is unsatisfied with the outcome of the school's complaints procedure, they can refer their complaint to the Education and Skills Funding Agency (ESFA). The ESFA will check whether the complaint has been dealt with properly by the school. The ESFA will not overturn a school's decision about a complaint, but will intervene if a school has:

- > Breached a clause in its funding agreement
- > Failed to act in line with its duties under education law



> Acted (or is proposing to act) unreasonably when exercising its functions

If the school's complaints procedure is found to not meet regulations, the school will be asked to correct its procedure accordingly.

For more information or to refer a complaint, see the following webpage:

www.gov.uk/complain-about-school

We will include this information in the outcome letter to complainants.

## 10. Unreasonable and persistent complaints

## 10.1 Unreasonable complaints

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

- > Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
- > Refuses to co-operate with the complaint's investigation process
- > Refuses to accept that certain issues are not within the scope of the complaint's procedure
- > Insists on the complaint being dealt with in ways which are incompatible with the complaint's procedure or with good practice
- > Introduces trivial or irrelevant information which they expect to be considered and commented on
- > Raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales
- > Makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced
- > Changes the basis of the complaint as the investigation proceeds
- > Repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
- > Refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed, including referral to the ESFA
- > Seeks an unrealistic outcome
- > Makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
- > Uses threats to intimidate
- > Uses abusive, offensive or discriminatory language or violence
- > Knowingly provides falsified information
- > Publishes unacceptable information on social media or other public forums

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

Complainants should try to limit their communication with the school while the complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text), as it could delay the outcome being reached.

#### Steps we will take



We will take every reasonable step to address the complainant's comments and give them a clear statement of our position and their options. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal (as outlined above) wherever possible.

Whenever possible, the headteacher or chair of governors will discuss any concerns with the complainant informally before applying an 'unreasonable' marking. If the behaviour continues, the headteacher will write to the complainant explaining that their behaviour is unreasonable, refer them to this policy and remind them to act in accordance with it. For complainants who excessively contact the school causing a significant level of disruption, we may:

- > Give the complainant a single point of contact via an email address
- > Limit the number of times the complainant can make contact, such as a fixed number per term
- > Ask the complainant to engage a third party to act on their behalf, such as Citizens Advice
- > Put any other strategy in place as necessary

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

## 10.2 Serial/persistent complaints

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

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

The case to stop responding is stronger if:

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

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

#### 10.3 Duplicate complaints

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

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

- > Tell the new complainant that we have already investigated and responded to this issue, and that the local process is complete
- > Direct them to the ESFA if they are dissatisfied with our original handling of the complaint

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

#### 10.4 Complaint campaigns



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

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

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

## 10.5 Vexatious Complaints

**Vexatious Complaints Process** 

The Blessed Christopher Wharton Catholic Academy Trust (BCWCAT) is committed to dealing with all complaints fairly and impartially. However, on rare occasions, individuals may pursue complaints in a manner that is unreasonable, persistent, or vexatious. This process outlines how such complaints will be managed in line with the Trust's Complaints Policy.

A complaint may be deemed vexatious when:

- It is pursued in a manner that is unreasonable, persistent, or aggressive.
- It seeks to harass, cause distress, or disrupt school operations.
- It repeats issues that have already been considered and resolved.
- It includes excessive demands on staff time and resources.

#### **Step-by-Step Process for Managing Vexatious Complaints**

#### Step 1: Identifying a Vexatious Complaint

Conduct an assessment of the complaint to determine whether it falls under the vexatious category. The responsibility for determining whether a complaint is vexatious typically falls to a senior leader or a designated complaints officer, in consultation with the appropriate members of the Trust's Governance Team. In some cases, this might involve the governance body, such as the board or a designated committee.

Seek advice from the relevant governing body or legal counsel if necessary.

Notify the complainant in writing, explaining why their complaint has been classified as vexatious and outlining any restrictions on future contact.

#### **Step 2: Implementing Restrictions**

Limit Communication: Restrict contact with the complainant to a single point of communication. Governance@bcwcat.co.uk

Set Response Timeframes: Establish a reasonable timeframe for correspondence.

Refuse Repetitive Complaints: Decline to respond to repeated issues unless new evidence is provided, and it is not within 3 months of the last complaint.

Issue a Formal Warning: Provide a written warning regarding behaviour and potential consequences.

#### **Step 3: Appeals Process**

If a complainant disagrees with the vexatious classification, they may appeal in writing within 10 school days.

The appeal will be reviewed by an independent panel.

The panel's decision will be communicated in writing. This decision is final.

#### Step 4: Ongoing Monitoring and Review

The Trust will periodically review cases to determine if restrictions can be lifted.

This process will be regularly reviewed to ensure fairness and compliance with best practices.



By implementing this step-by-step process, the Blessed Christopher Wharton Catholic Academy Trust aims to ensure a fair and respectful complaints procedure while safeguarding staff and resources from unreasonable or disruptive complaints.

## 10.6 Anonymous Complaints

Schools are not required to respond to anonymous complaints. However, schools should still consider whether the concern raised contains serious safeguarding issues or allegations of criminal activity, which may require further investigation.

## 11. Record keeping and confidentiality

The school will record the progress of all complaints, including information about actions taken at all stages, the stage at which the complaint was resolved, and the outcome. The records will also include copies of letters and emails, and notes relating to meetings and phone calls.

This material will be treated as confidential and stored securely and will be viewed only by those involved in investigating the complaint or on the review panel.

This is except where the secretary of state (or someone acting on their behalf) or the complainant requests access to records of a complaint through a freedom of information (FOI) request or through a subject access request under the terms of the Data Protection Act, or where the material must be made available during a school inspection.

Records of complaints will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and record retention schedule.

The details of the complaint, including the names of individuals involved, will not be shared with the whole governing board in case a review panel needs to be organised at a later point.

Where the governing board is aware of the substance of the complaint before the review panel stage, the school will (where reasonably practicable) arrange for an independent panel to hear the complaint.

Complainants also have the right to request an independent panel if they believe there is likely to be bias in the proceedings. The decision to approve this request is made by the governing board, who will not unreasonably withhold consent.

# 12. Learning lessons

The governing board will review any underlying issues raised by complaints with the headteacher / senior leadership team / job title of appropriate staff member], where appropriate, and respecting confidentiality, to determine whether there are any improvements that the school can make to its procedures or practice to help prevent similar events in the future.

# 13. Monitoring arrangements

The governing board will monitor the effectiveness of the complaints procedure in making sure that complaints are handled properly. The governing board will track the number and nature of complaints, and review underlying issues as stated in section 11.

The complaints records are logged and managed by the Governance Administrator <a href="mailto:governance@bcwcat.co.uk">governance@bcwcat.co.uk</a>

This policy will be reviewed every 3 years.

At each review, the policy will be approved by the Blessed Christoper Wharton Trust Board.



## 14. Links with other policies

Policies dealing with other forms of complaints include:

- > Admissions policy
- > Child protection and safeguarding policy and procedures
- > Parents, Visitors & Carers Code of Conduct
- > Suspension and permanent exclusion policy
- > Staff grievance procedures
- > Staff disciplinary procedures
- > Special educational needs policy and information report
- > Privacy notices
- Whistleblowing