

# Complaints Policy and Procedure

St John's Catholic Comprehensive School



*Excellence for All  
Service to Others  
Inspired by Christ*

<b>Date of last review:</b>	July 2025	<b>Date of next review:</b>	July 2028
<b>Owner</b>	Senior Assistant Headteacher (Pastoral)	<b>Quality Assures:</b>	Headteacher
<b>Approval</b>	Full governing Body Panel		

## 1. Aims

St John's Catholic Comprehensive School aims to meet its statutory obligations when responding to complaints from parents of pupils at our school.

When responding to complaints, our aim is 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 wherever possible
- 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 will try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed. We will aim to give the complainant the opportunity to complete the complaints procedure in full. To support this, we will ensure that it publicises 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 Education (Independent School Standards) Regulations 2014, which states that the school must have and make available a written procedure to deal with complaints from parents of pupils at our school, and refers to good practice guidance on setting up complaints procedures from the Department for Education (DfE)

## 3. Definitions and scope

### 3.1 Definitions

The DfE guidance explains the difference between a concern and a complaint:

- A **concern** is defined as “an expression of worry or doubt over an issue considered to be important, for which reassurances are sought”.
- A **complaint** is defined as “an expression of dissatisfaction, however made, about actions taken or a lack of action”.

## 3.2 Scope

The school intends to resolve complaints informally where possible, at the earliest possible stage. There may be occasions when complainants would like to raise their concerns formally. This Policy outlines the procedure relating to handling such complaints. This Policy does **not** cover complaints procedures relating to:

- Admissions
- Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- Suspension and permanent exclusion
- Whistleblowing
- Staff grievances
- Staff discipline
- Withdrawal from the curriculum (parents and carers can withdraw their child from any aspect of religious education, including the daily act of collective worship. They do not have to explain why).

Please see our separate policies for procedures relating to these types of complaint. Complaints about child protection matters are handled under our 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). Tel. 03000 410888 Email. [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or Tribunals, this may impact on our ability to adhere to the timescales within this procedure or result in the procedure being suspended until those public bodies have completed their investigations.

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 publish details about the complaint on social media.

## **4.2 The Investigator**

An individual will be appointed to look into 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 other lead person from the school depending on the level of the complaint) which includes the facts and potential solutions.

## **4.3 The Complaints Coordinator**

If necessary, an individual may be appointed to:

- Keep the complainant up to date at each stage of the procedure
- Make sure the process runs smoothly by liaising with appropriate staff members or other parties
- 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 The Clerk to the Review Panel**

The Clerk to the review panel will:

- Be the contact point for the complainant and any review panel, including circulating the relevant papers and evidence before review panel meetings
- Arrange the review panel
- Record and circulate the minutes and outcome of the hearing.

## **4.5 Review Panel Chair**

The review panel 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 review panel, 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. The school will consider exceptions to this time frame 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, the school will consider them to have been received on the first school day after the holiday period. If at any point, the school cannot meet the time scales 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.

## **6. General complaints (not complaints against Headteacher or Governor)**

The school recommends that complainants attempt informal resolution under Stage 1 of this policy before making a formal complaint, if it is appropriate to do so. If this is not appropriate and the complainant wishes to go straight to the formal stage then this should be done under Stage 2 of the policy, please see section 6.2.

### **6.1 Stage 1: informal**

The complainant should raise the complaint as soon as possible with the relevant member of 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 either in person or by phone/email.

The school will take informal concerns 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 school will acknowledge informal complaints within 5 school days, look into the matter and provide a response within 20 school days. If a response cannot be provided within 20 school days, the school will inform the complainant and advise that additional time is required to investigate the complaint. The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate. If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 6.2 of this Policy.

### **6.2 Stage 2: formal**

The formal stage involves the complainant putting the complaint to the Headteacher. Formal complaints can be raised:

- By letter or email
- Over the phone
- In person
- By a third party acting on behalf of the complainant.

If complainants need assistance raising a formal complaint, they can contact the school office either in person or by phone/email.

The Headteacher (or the person appointed on their behalf) will record the date the complaint is received and will acknowledge receipt of the complaint in writing (either by letter or email) within 2 school days.

The Headteacher (or the person appointed on their behalf) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within 20 school days.

The school may engage an independent, external person to carry out the investigation into the Stage 2 complaint or to review the investigation and response at Stage 2. This may be appropriate where the complaint is particularly complex or involves legal issues.

## **How to escalate a complaint**

If the complainant wishes to proceed to the next stage of the procedure, they should inform the clerk to the Governors in writing within 5 school days. Contact details can be found on the school website or office. Complaints can be escalated by contacting the clerk to the governors:

- By letter or email
- Over the phone
- In person
- By a third party acting on behalf of the complainant.

The clerk 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: review panel**

### **Convening the panel**

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

The review panel will be appointed by the Governing Body and must consist of at least 3 individuals who were not directly involved in the matters detailed in the complaint. At least 1 panel member must be independent of the management and running of the school. A governing body member from another school, who has no conflict of interest or prior knowledge of the complaint, can be an independent panel member.

The review panel will have access to the existing record of the complaint's progress. 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 review panel will go ahead using written submissions from both parties. Any written material will be circulated to all parties at least 5 school days before the date of the meeting.

## **At the meeting**

The meeting will be held in private, electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent for recording of all parties attending will be sought before meetings or conversations take place. Consent will be recorded in the 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.

The complainant must be allowed to attend the Complaint Panel meeting and be accompanied by a suitable companion, such as a friend or family member, if they wish. 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 review 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 review 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 Headteacher.

## **The outcome**

The panel can:

- Uphold the complaint, in whole or in part
- Dismiss the complaint, in whole or in part. If the complaint is upheld, the panel 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.

## **7. Complaints against the Headteacher**

### **7.1 Stage 1: informal**

The complainant should raise the complaint made against the Headteacher to the Chair of Governors who will take informal concerns 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 Chair of Governors, or their representative, will acknowledge informal complaints within 5 school days, look into the matter and provide a response within 20 school days. If a response cannot be provided within 20 school days, the complainant will be informed and advised that additional time is required to investigate the complaint.

The informal stage may involve a meeting between the complainant and the relevant staff members, as appropriate.

If the complaint is not resolved informally, it can be escalated to a formal complaint under Section 7.2 of this Policy.

## **7.2 Stage 2: formal**

The formal stage involves the complainant putting the complaint to the Chair of Governors:

- In a letter or email
- 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 by phone/email.

The Chair of Governors, or their representative, will record the date the complaint is received and will acknowledge receipt of the complaint in writing (either by letter or email) within 3 school days.

A suitable individual will be appointed to carry out an investigation. The written conclusion of the investigation will be sent to the complainant within 20 school days.

If the complainant is not satisfied with the response and wishes to proceed to the next stage of this procedure, they should inform Diocese in writing within 5 school days via the address below:

Education Service St Edward's House St Paul's Wood Hill Orpington BR5 2SR  
Email: [ecenquiries@rcaos.org.uk](mailto:ecenquiries@rcaos.org.uk)

## **7.3 Stage 3: review panel**

### **Convening the meeting**

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 Governing Body and must consist of at least 3 panel members who were not directly involved in the matters detailed in the complaint.

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 5 days before the date of the meeting.

### **At the meeting**

The meeting will be held in private, electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent for recording of all parties attending will be sought before meetings or conversations take place. Consent will be recorded in the 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.

The complainant must be allowed to attend the review panel meeting and be accompanied by a suitable companion, such as a friend or family member, if they wish. 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 review 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 review 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.

### **The outcome**

The panel can:

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

If the complaint is upheld, the panel 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.

## 8. Persistent complaints

### 8.1 Unreasonably persistent complaints

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

- Has made the same complaint before, and has already been resolved by following the School's complaints procedure;
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive;
- Knowingly provides false information;
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure;
- Pursues a valid complaint, but in an unreasonable manner e.g. refuses to articulate the complaint, refuses to co-operate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out;
- Changes the basis of the complaint as the investigation goes on;
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time;
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value.

### Steps that will be taken

The school will take every reasonable step to address the complainant's concerns 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. If the complainant continues to contact the school in a disruptive way, we may put communications strategies in place. 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.

### Stopping responding

The School may stop responding to the complainant when all of these factors are met:

- The School believes we have taken all reasonable steps to help address their concerns
- The School has provided a clear statement of our position and their options
- The complainant contacts us repeatedly, and the School believes their intention is to cause disruption or inconvenience. □

Where the School stops responding, we will inform the individual of its intention to do so. The School will also explain that any new complaints made will still be considered. In response to any serious incident of aggression or violence, the School will immediately inform the police and communicate our actions in writing. This may include barring an individual from our School site.

## **8.2 Duplicate complaints**

If the School has resolved a complaint under this procedure and receives a duplicate complaint on the same subject from a partner, family member or other individual, the School will assess whether there are aspects that it had not previously considered, or any new information it needs to take into account.

If the School is satisfied that there are no new aspects, it will:

- Tell the new complainant that the School has already investigated and responded to this issue, and the local process is complete

## **8.3 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 response from the School, or wish to pursue the complaint further, the normal procedures will apply.

## **9. Record keeping**

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 final 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, held at the School, 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 (SAR) 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.

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

## **10. Learning lessons**

The Governing Body will review any underlying issues raised by complaints with Senior Leaders, 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.

## **11. Monitoring arrangements**

The Governing Body will monitor the effectiveness of the complaints procedure in ensuring that complaints are handled properly including tracking the number and nature of complaints, and review underlying issues.

## **12. Links with other policies or documents**

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Admissions policy
- Behaviour, suspensions and permanent exclusions policy
- Staff grievance procedures
- Staff disciplinary procedures
- SEND information report
- Privacy notices.