June 2026

STCAT Schools Complaints Policy & Procedure

Approved By: Trust Board

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St Thomas
Catholic Academies Trust

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Introduction

St Thomas Catholic Academies Trust (STCAT)
'The Glory of God is a Human Being fully alive!'

In the St Thomas Catholic Academies Trust (STCAT), human flourishing and the uniqueness of every individual are at the heart of our educational enterprise. We operate out of two basic principles of Catholic Social Teaching: solidarity (a family of schools, supporting, challenging, and inspiring one another) and subsidiarity (an organisation in which decisions are taken at the lowest possible level). The Board of Directors are ultimately accountable for the performance and probity of the Trust as a whole, as well as for the nurturing of its Catholic Life. We are very aware that we hold public money in trust and are responsible for the well-being and development of young people. All our schools, each with their own vision and Mission Statement, seek to flourish within this overall ethos. Central to it, as a Catholic Trust, is the active and fruitful partnership between each of our schools and the parents and carers who entrust their children to them. All our schools wish to develop and foster good relationships with parents, carers, parishes, and the wider community.

In keeping with the wish to maintain good relationships, this 'Schools' Complaints Policy' aims to ensure that a concern, difficulty or complaint is managed confidentially, sympathetically, efficiently and at the appropriate level, and resolved as soon as possible. Each school will try to approach any concern, difficulty or complaint in a positive way, aiming: to put right a matter which may have gone wrong; to clear up any misunderstanding; or, where necessary, to review the school's systems and procedures in the light of the matters raised.

Every school needs to know as soon as possible if there is any cause for dissatisfaction. They recognise that a concern or difficulty which is not resolved quickly and fairly can be damaging to the relationship between school and home, or between school and the wider community. No-one should ever feel – or be made to feel – that raising a concern, difficulty or complaint will have an adverse effect on their circumstances, or on their child, in any way. Each STCAT school will be ready to listen.

We want anyone with a concern about any of our STCAT schools to feel able to express it, confident that they will be given any help or support they might need to do so, and that they will be treated fairly. Therefore, this policy has been written in the light of the Principles of Natural Justice and in line with the Equality Act 2010 (both in Appendix 2).

This policy sets out the general principles, the guidance of the Keeping Children Safe in Education takes precedence, especially where this is in respect of the wishes of the child.

Who can 'complain':

For the purpose of this Complaints Policy, a person making a complaint will be referred to as a "Complainant". The "Complainant" can be:

- a parent/guardian/carer of a student
- a member of the public who is not a parent/guardian/carer of a student

A "parent" includes the natural or adoptive parent of a student, irrespective of whether they are or ever have been married, whether they are separated or divorced, whether the student lives with them, whether or not they have parental responsibility for the student or whether they have contact with the student.

A "parent" will also include a non-parent who has parental responsibility for a student, an adult non-parent with whom the student lives, and an adult who is involved in the day-to-day care of the student (for example, collecting or dropping off the student from school).

Any reference to a "student" will also include a prospective or former student of the School.

This Policy applies to all schools in STCAT

The following schools are academies within the Trust:

Bucks:

- Our Lady's Catholic Primary School
- St Edward's Catholic Junior School
- St Joseph's Catholic Infant School
- St Joseph's Catholic Primary School
- St Louis' Catholic Primary School
- St Michael's Catholic School
- St Peter's Catholic Primary School

Luton and Central Beds:

- Cardinal Newman Catholic School
- Sacred Heart Primary School
- St Joseph's Catholic Primary School
- St Margaret of Scotland Catholic Primary School
- St Martin de Porres Catholic Primary School
- St Mary's Catholic Primary School
- St Vincent's Catholic Primary School

Slough:

- Holy Family Catholic Primary School
- Our Lady of Peace Catholic Primary School
- St Anthony's Catholic Primary School
- St Ethelbert's Catholic Primary School
- St Joseph's Catholic High School

Our schools are governed by the Education (Independent School Standards) Regulations 2014 (as amended) ("the Regulations"). 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.

Applicable and non-applicable complaints

This Schools' Complaints Policy applies to:

concerns and complaints in relation to a specific school within STCAT, or its staff, or its Local Academy Committee (LAC - similar to governors).

A valid complaint must be received within 6 months of the issue/event. See section "Late Complaints" below for further information.

However, please do not use this policy for concerns about:

- child protection issues
- admissions
- exclusions/suspension
- SEND
- whistleblowing
- staff grievances
- staff discipline
- withdrawal from the curriculum
- data protection complaints

Each of these has its own statutory policy.

Also: this Schools' Complaints Policy does not apply to complaints in relation to:

- any member of the Trust Team, including the Chief Executive Officer (CEO)
- any member of the Board of Directors
- the Board of Directors as a body.

The separate STCAT Trust Team Complaints Policy deals with such complaints.

Also, sometimes, where a complaint is made against a member of staff, depending upon the nature and seriousness of the complaint, the matter may be dealt with under separate HR procedures – which are strictly confidential – rather than under this Complaints Policy.

In accordance with Diocesan Protocols, the Headteacher or Chair of the LAC will immediately inform the Chief Executive Officer (CEO) – who will in turn immediately inform the Chair of Directors and the Diocese – of any concerns that may have a detrimental impact on the school, or the Trust as a whole, in the following areas:

- Catholic character, ethos and mission
- Religious Education
- Collective Worship
- Admissions
- Relationship and Sex Education
- Denominational Inspections

This Complaints Policy distinguishes between a concern or difficulty, which can usually be resolved informally, and a formal complaint which will require further investigation.

Raising a concern or complaint – the 'Procedure'

The Trust's complaints procedure consists of three stages:

- Stage 1 – Concerns and difficulties, raised with an appropriate member of staff and dealt with informally;
- Stage 2 – Complaints formally investigated by the Headteacher (or designate);
- Stage 3 – Complaint Panel Hearing which will consist of at least 1 Director, 1 member of the school's LAC and one person independent person, who can be a LAC member from another Trust school. .

If the complaint is about the conduct of the Headteacher, the Chair of the LAC will investigate the complaint under Stage 2 of this Complaints Policy instead of the Headteacher.

If a complaint is about the conduct of the Chair of the LAC, the Headteacher will consider the complaint under Stage 2 of this Complaints Policy as normal.

Possible ways to resolve a complaint:

During each of the three stages, the person dealing with the matter will consider whether and how the complaint may be resolved. In doing so, they will give due regard to the seriousness of the complaint. It may be appropriate, to resolve the matter, for the complainant to be offered:

- An explanation
- An apology
- Reassurance that steps have been taken to prevent a recurrence of events which led to the complaint
- Reassurance that the school will undertake a review of its procedures in light of the complaint

None of the above will constitute an admission of negligence or an acceptance of liability on the part of the school.

It is also possible that it may be appropriate to give an explanation as to why a specific resolution sought by a complainant may be inappropriate, unreasonable, or undesirable.

It should be remembered that a complainant may, at any point in the process, withdraw the complaint if they wish to.

Time Limits

The Trust aims to resolve concerns, difficulties, and complaints in a timely manner. Time limits for each stage of the procedure are set out under each individual stage. For the purposes of this Complaints Policy, a "school day" is defined as a weekday during term time, when the School is open to children. The definition of "school day" excludes weekends, school holidays and bank holidays.

Although every effort will be made by the Trust to comply with the time limits specified under each stage of the procedure, it may not always be possible to do so, for example due to the complexity or number of matters raised, or due to the unavailability of the Complainant or those involved to attend a meeting, if offered. In all cases, where a time limit cannot be complied with, the School or the Trust Secretary will write to the Complainant within the specified time limit, setting out the reasons why the time limit cannot be complied with, and confirming the new time limit which will apply.

Possible Outcomes

- There was insufficient evidence to reach a conclusion so the complaint cannot be upheld;
- The investigation did not substantiate the matters raised, so the complaint cannot be upheld;
- The complaint was substantiated in part or full. A description should be given of the remedial action being taken by the school in response. Details of any disciplinary action or sanctions to be taken against a member of staff are strictly confidential and cannot be disclosed;
- The matter has been fully investigated and, consequently, further confidential procedures are being pursued. Details of any disciplinary action or sanctions to be taken against a member of staff are strictly confidential and cannot be disclosed.

Communications Protocol and Use of AI Tools in Parent Communications and Complaints

We understand that many families may use artificial intelligence (AI) tools to support communication with the school. While these tools can be helpful, we ask that parents and carers keep the following guidance in mind:

- Please ensure your complaint aligns with our Stakeholder Communications Protocol (see Appendix 3)
- Please ensure that any messages or documents generated with the help of AI reflect your genuine concerns, questions or feedback. AI can assist with wording, but it's important that communication remains personal and relevant to your child's experience.
- When using AI, make sure your complaint is clearly stated and that you fully understand what is being communicated.
- Our staff will always respond to communications that are clear, respectful and appropriate. If a message appears to be generated by AI and lacks clarity or context, this will delay the response time, we may need to ask for further clarification to ensure we understand your concerns fully.
- Where AI tools are used, parents and carers are asked to consider the length of their submission, avoid unnecessary repetition, and be mindful of the staff time required to review overly long and repetitive complaints documentation. This helps ensure complaints can be reviewed fairly, promptly and efficiently, while making best use of school resources and enabling timely responses for all families.
- If you need help expressing your thoughts, please contact the school directly.

The Procedure in Detail

Stage 1: Concerns and Difficulties (Informal)

1. Concerns:
Any STCAT school expects that most concerns and difficulties (where a complainant seeks intervention, reconsideration or some other action) can be resolved informally.

Examples might include:
- dissatisfaction about some aspect of teaching or pastoral care
- allocation of privileges or responsibilities
- a timetable clash
- an issue with the School's systems or equipment

2. **Notification:**
The concern or difficulty should be raised as follows:
- Education issues – if the matter relates to the classroom, the curriculum or teaching, the complainant should speak to the person responsible for the year group, Head of Department, Senior Leader or Deputy Headteacher, as appropriate.
- Pastoral care – for concerns relating to matters outside the classroom, the Complainant should speak to the person responsible for the year group, Head of Department, Senior Leader or Deputy Headteacher, as appropriate.
- For Pupil disciplinary matters – a problem over any disciplinary action taken or a sanction imposed should be raised in the first instance with the member of staff who imposed it. If the matter is not resolved, the Complainant should speak to the relevant Head of Department, person responsible for the year group, or Deputy Headteacher.
- An issue with a specific member of staff – often, the best way to resolve an issue with a specific member of staff is to raise it with that member of staff directly, so that they are given the opportunity to address and resolve the concern or difficulty before it becomes a formal complaint. If the Complainant feels uncomfortable doing this, however, the issue should be raised with the appropriate Head of Department, the person responsible for the year group, Deputy Headteacher, or Line Manager.

Should a concern or difficulty be raised with a member of staff who feels that they are not the best person to be dealing with it, they will refer it to the Head of Department, the person responsible for the year group, Deputy Headteacher or other designated member of staff as appropriate.

If a concern or difficulty is raised with a member of staff who feels that it raises serious issues which should be dealt with as a formal complaint immediately, the member of staff will tell the Complainant that they should put their complaint in writing to the Headteacher under Stage 2 of this Complaints Policy. If the Complainant would prefer to complete a form instead of writing a letter, the Complainant can complete the Complaint Form contained in Appendix 1 of this Complaints Policy to submit their complaint formally.

3. **Unresolved Concerns and Difficulties**
Any School within the Trust will aim to resolve a concern or difficulty within fifteen school days of the date that it was raised. Where a concern or difficulty has not been resolved by informal means within this time limit from the date that it was raised, the complainant can submit the matter as a formal complaint under Stage 2 of this Complaints Policy.

4. **Record of Concerns and Difficulties**
The member of staff dealing with a concern or difficulty will make a written record of the issues raised, the action taken and, if applicable, the resolution reached. This record will be retained on file. Further information in

relation to the retention of records can be found on Page 12.

Stage 2: Formal Complaint to the Headteacher

5. **Notification**

A concern or difficulty raised under Stage 1 of this Complaints Policy which remains unresolved after fifteen school days, or a serious matter which requires formal investigation from the outset, should be set out in writing and sent to the Headteacher at the School. Should a formal written complaint be received by another member of the School's staff, they will immediately pass it on to the Headteacher.

Using Appendix 1a, the Complainant should clearly set out the matters in dispute, the relevant dates, the full names of the persons involved and what the complainant would like the School to do to resolve the complaint. Any documentation relied upon by the Complainant should be attached to the formal complaint.

6. **Acknowledgement**

The formal complaint will be acknowledged in writing within ten school days of receipt. The acknowledgement letter will confirm the date that the formal complaint was received, the action to be taken and the specified time limit.

7. **Investigation**

The Headteacher will be provided with the records of the Stage 1 informal procedure (if applicable) within ten school days of receipt of the formal complaint and will then proceed to investigate the complaint. This will involve obtaining and considering all documentation held by the School which is relevant to the complaint. If further information is required from the Complainant, this may be requested from them over the telephone or in writing.

The Headteacher will speak to the persons who were involved in the matters raised by the Complainant. Students will only be spoken to with an independent member of staff present to support them. Where there is an issue about the conduct of a member of staff, that member of staff will be offered the option of having another member of staff present. Other members of staff will be spoken to alone. A written record of each conversation will be made, and the student or member of staff spoken to will be asked to read, sign and date the written record to confirm that it is accurate. In the case of students, the accompanying independent member of staff will also be asked to sign and date the record of the conversation.

If the Headteacher deems it to be appropriate, the Complainant will be offered a meeting to discuss the issues raised. This may take place at the beginning of the investigation to clarify any matters which are unclear, or after the investigation has taken place, with the aim of reaching an amicable resolution.

We understand that complaints are not always straightforward and, as a Catholic Trust, we are committed to working collaboratively with individuals, including through face to face interactions, to address concerns in the most effective way and ultimately achieve a resolution.

If new information about the Headteacher who has been dealing with the complaint arises during the Stage 2 complaint process, whether during the investigation or after the outcome letter, the Stage 2 process will be extended. In such cases, the complaint will be reassigned to a member of the Trust Team. This extended process will adhere to the established procedure, ensuring the complainant is informed of the actions to be taken and provided with a clear timeline for resolution.

8. **Outcome**

The Headteacher will write to the Complainant confirming the outcome of the investigation within twenty school days from the date that the complaint was received. The letter will set out the individual matters raised by the Complainant, the findings made by the Headteacher during the course of the investigation, and the conclusion reached.

The letter will inform the Complainant that, if they are not satisfied with the outcome of the Stage 2 investigation, they should write to the Clerk to the Board of Directors within ten school days of receipt of the letter requesting a Complaint Panel Hearing under Stage 3 of this Complaints Policy.

Where the complaint was received during a school holiday, or within twenty school days from the end of a term or half term, the Headteacher will endeavour to expedite the investigation wherever possible but the investigation may have to pause over a school holiday period.

9. **Delegation**

In appropriate cases, the Headteacher may delegate the complaint to a member of the Senior Leadership Team to deal with in accordance with the procedure outlined above.

Stage 3: Complaint Panel Hearing

15. **Notification**

If the Complainant is not satisfied with the outcome of the complaint under Stage 2 of this Complaints Policy, the Complainant may write to the Clerk to the Board of Directors, using Appendix 1b requesting a Complaint Panel Hearing. The Complainant should write to the Clerk within ten school days of receiving the letter confirming the outcome following Stage 2.

The Complainant should not repeat the matters raised in their original letter, or attach documentation already provided, but should clearly set out how and why the Complainant does not accept the findings made under Stage 2 and the resolutions sought.

16. **The Complaint Panel**

The Complaint Panel will consist of at least three persons appointed by the Clerk to the Board of Directors. None of the Complaint Panel members will have been involved in the matters which gave rise to the complaint, have been involved in dealing with the complaint previously or have any detailed prior knowledge of the complaint. One Member of the Panel will be a Governor of the school's Local Academy Committee and another member of the Panel will be independent of the management and running of the Trust, i.e. they will not be a member of staff, Governor of the school or Director, and will not be linked to the School in another way, for example as a parent of a student at the School. A Governor from another Trust school may sit on the Panel as long as they have no conflict of interest or prior knowledge of the complaint. The final Panel member will either be a Governor from another LAC within the Trust or a Board Director.

17. **Attendance**

The Complainant may attend the Complaint Panel Hearing and may be accompanied by another person. For the avoidance of doubt, the Complainant's supporter will be present for moral support only and will not play any part in the proceedings, unless invited to do so by the Chair of the Complaint Panel, entirely at his or her discretion and for a good reason. The Complaint Panel Hearing will be an online meeting, unless an in-person meeting is specifically requested by the Complainant.

The Complaint Panel Hearing is not a legal hearing and it is not appropriate for either the Complainant or the School to be legally represented.

The School will be represented at the Complaint Panel Hearing by the person who dealt with the complaint under Stage 2, which will usually be the Headteacher. This person will be referred to as the "School's Representative" for the purposes of Stage 2.

A matter expert, for example, the Trust Director of Inclusion, may attend the Complaint Panel Hearing, at the request of the Complaint Panel, in order to offer statutory guidance and process on specific issues. They will take no part in the decision making process.

The Complaint Panel Hearing will be minuted by either the Clerk to the Board of Directors or the Clerk to the Local Academy Committee.

18. **Convening the Complaint Panel Hearing**

The Clerk to the Board of Directors will write to the Complainant within ten school days acknowledging receipt of their request.

After selecting the Complaint Panel members, and liaising with the Complaint Panel, the Complainant and the School's Representative, the Clerk will write to the Complainant within ten school days, informing them of the names of the Complaint Panel members, and confirming the mutually agreed date of the Complaint Panel Hearing. If the Complainant objects to any of the named persons being appointed to the Complaint Panel, or needs to agree another mutually convenient date, they should notify the Clerk within three school days of receipt of the letter. Fair consideration will be given to any bona fide objection to a specific member of the Complaint Panel. If the Complaint Panel Hearing will not take place within twenty school days of receipt of the Complainant's request, the letter will set out the exceptional circumstances involved.

19. **Documentation**

The Clerk to the Board of Directors will forward a copy of all paperwork relating to the complaint to the Complainant, the School's Representative and the Complaint Panel members no later than seven days before the Complaint Panel Hearing (exactly one week). Such paperwork will consist of: the record of the Stage 1 informal procedure (if applicable); the original letter of complaint or Complaint Form; any documentation provided by the Complainant with their complaint; all investigation records under Stage 2, with the letter of outcome; and the Complainant's letter requesting a Complaint Panel Hearing, and accompanying documents.

The names of individuals other than the Complainant, the Complainant's family, members of the School's staff and LAC members, will be redacted.

If the Complainant wishes the Complaint Panel to consider any additional information, they should forward this documentation to the Clerk to the Board of Directors to arrive at least seven days before the Complaint Panel Hearing (exactly one week), to enable the Clerk to forward it to the School's Representative and the Complaint Panel members.

20. **Witnesses**

The Chair of the Complaint Panel will decide, at his or her absolute discretion, which witnesses will be permitted to attend the Complaint Panel Hearing to give a verbal statement, rather than relying on a written statement or record of meeting which has been signed by the witness.

If the Complainant wishes to rely on the account of a witness, they should ask the witness to write down, sign and date their account and forward it to the Clerk to the Board of Directors at least seven days (exactly one week) before the Complaint Panel Hearing, to enable the Clerk to forward it to the School's Representative and the Complaint Panel members.

Witnesses under the age of eighteen other than the Complainant's own family will only be allowed to attend the Complaint Panel Hearing at the discretion of the Chair of the Complaint Panel, and then only if they are accompanied by one of their parents or carers. Any written accounts provided by the Complainant relating to witnesses under the age of eighteen must be signed and dated by the witness and one of the witness's parents or carers.

Members of staff of the School involved in the matters which gave rise to the complaint will usually have provided a signed written account or have signed a note of a meeting, during the previous stages. Such paperwork will be forwarded to all parties with the other complaint documentation in the usual way. Members of staff will not usually be required to attend the Complaint Panel Hearing to give a verbal statement unless their conduct is in issue or their account is contentious and the rules of natural justice dictate that the Complainant should be

allowed to ask that member of staff questions.

21. **Procedure at the Complaint Panel Hearing**

The Complaint Panel Hearing will be conducted as follows:

- The Chair of the Complaint Panel will greet the Complainant, the Complainant's supporter, and the School's Representative, and welcome them into the meeting room/online meeting room where the Complaint Panel has convened. Introductions of names and roles will be made. (Any witnesses will remain outside of the meeting room/online meeting room until they are invited in to give their account).
- The Complainant will be invited by the Complaint Panel to give an account of their complaint. A maximum of 15 minutes will be allocated.
- The School's Representative will be invited to ask the Complainant questions.
- The Complaint Panel will ask the Complainant questions.
- At the discretion of the Chair of the Complaint Panel, the Complainant's first witness will be invited into the meeting room/online meeting room to give an account of what they saw or know.
- The School's Representative will be invited to ask the Complainant's witness questions.
- The Complaint Panel will ask the Complainant's witness questions.
- The Complainant's witness will be asked to leave the meeting room/online meeting room.
- If the Complainant has any further relevant witnesses, they – at the discretion of the Chair of the Complaint Panel – will be invited into the meeting room/online meeting individually, to provide their accounts and be questioned as outlined above.
- The School's Representative will be invited by the Complaint Panel to respond to the complaint and make representations on behalf of the School. A maximum of 15 minutes will be allocated.
- The Complainant will be invited to ask the School's Representative questions.
- The Complaint Panel will ask the School's Representative questions.
- At the discretion of the Chair of the Complaint Panel, the School's relevant first witness will be invited into the meeting room/online meeting to give an account or what they saw or know.
- The Complainant will be invited to ask the School's witness questions.
- The Complaint Panel will ask the School's witness questions.
- The School's witness will be asked to leave the meeting room/online meeting room.
- If the School has any further relevant witnesses, they will – at the discretion of the Chair of the Complaint Panel – be invited into the meeting room/online meeting individually, to provide their accounts and be questioned, as outlined above.
- The Complainant will be invited by the Complaint Panel to summarise their complaint.
- The School's Representative will be invited by the Complaint Panel to summarise their response to the complaint and the School's stance.
- The Complaint Panel Hearing will conclude, and the Complainant and the School's Representative will be asked to leave.

22. **The Complaint Panel's Decision**

The Complaint Panel will convene in private immediately after the Complaint Panel Hearing, and will consider all the documentation and everything that they have heard at the Complaint Panel Hearing and make:

- **Findings of Fact**

  The Complaint Panel will decide which facts are established to be true, on a balance of probabilities (i.e. more likely than not). If a fact is not deemed relevant, the Complaint Panel will not consider it further. The Complaint Panel will make a written record of the facts that have been established, those which have not been established and those which are not relevant, with their reasons for making these findings.

- **Recommendations**

  The Complaint Panel will consider the facts which they have established and, if appropriate, will make recommendations based upon them. These recommendations may be aimed at achieving reconciliation between the parties (for example, a written apology), improving procedures, or preventing a recurrence in the future. The Complaint Panel will keep a written record of their recommendations, with reasons.

23. **Notification of the Complaint Panel's Decision**

The Clerk to the Board of Directors will write within ten school days of the Complaint Panel Hearing to:

- the Complainant
- the School's Representative
- any person complained about

The letter will identify each of the issues complained about, summarise how the Complaint Panel Hearing proceeded, and confirm each of the Complaint Panel's findings of fact and recommendations, if any, with reasons. The letter will also confirm that, if the Complainant believes that this Complaints Policy does not comply with the Regulations, or that the School and/or Complaints Panel has not followed the procedure outlined in this Complaints Policy, the Complainant may refer their complaint to the Department for Education (DFE). DFE will not investigate the complaint itself but may check whether the Schools Complaint Policy complies with Regulations, and whether the school and/or Complaints Panel has followed the Policy correctly.

The Clerk to the Board of Directors will also ensure that a copy of the Complaint Panel's findings and recommendations are made available on the School's premises for inspection by the Trust, the LAC and the Headteacher.

24. **Factors for the Complaint Panel to Consider**

- It is important that the Complaint Panel Hearing is impartial, and that it is seen to be so. No person may sit on the Complaint Panel if they have had a prior direct involvement in the specific matters which gave rise to the complaint, in dealing with the complaint in the previous stages, or have a prior detailed knowledge of the complaint.
- The aim of the Complaint Panel Hearing, which must be held in private, will always be to resolve the complaint and achieve reconciliation between the school and the Complainant. However, it has to be recognised that the Complainant may not be satisfied with the outcome if the Complaint Panel does not find wholly in their favour. In such circumstances, it may only be possible to be scrupulous in establishing the facts and thereby demonstrate to the Complainant that his or her complaint has been taken seriously.
- An effective Complaint Panel will acknowledge that many Complainants feel nervous and inhibited in a formal setting. Parents often feel emotional when discussing an issue that affects their child. The Chair of the Complaint Panel will ensure that the Complaint Panel Hearing is as welcoming as possible, while ensuring that it is procedurally fair to all parties. Where the meeting is held in-person the layout of the room will set the tone, and care is needed to ensure the setting is informal and not substantially adversarial.
- Extra care needs to be taken when the Complainant is a child, or there are child witnesses present. Care should be taken to ensure that the child does not feel intimidated. The Complaint Panel should be aware of the views of the child and give them as much consideration as those of the adults present. Where the child's parent is the Complainant, it would be helpful to give the parent the opportunity to suggest which parts of the hearing, if any, the child should attend, with the Chair retaining discretion.
- The Complaint Panel should ensure that they are familiar with the Schools Complaints Procedure in advance of the Complaint Panel Hearing.

The Chair of the Complaint Panel will play a key part at the Complaint Panel Hearing, ensuring that:

- The remit of the Complaint Panel is explained to the parties and each party has the opportunity of making representations without undue interruption
- All of the issues raised in the complaint are addressed
- Key findings of fact are made, on a balance of probabilities
- Each party treats the other with respect and courtesy
- The Complaint Panel is open minded and impartial, and acts independently of the School
- No member of the Complaint Panel has a vested interest in the outcome of the proceedings
- Each side is given the opportunity to state their case and ask questions
- All written material is seen by all parties. If a new issue arises during the Complaint Panel Hearing, it would be useful to pause and give all parties the opportunity to consider and comment on it.

Referral to the DFE

Once a complaint has been through all the stages of this Complaints Policy, the procedure is at an end.

However, if the Complainant believes that this Complaints Policy does not comply with the Regulations, or that the School and/or Complaints Panel has not followed the procedure in this Complaints Policy, the Complainant can refer the complaint to the DFE.

The Complainant should be aware that the DFE will not usually investigate the complaint itself, or interfere with the findings of the Complaint Panel, unless the decision made was manifestly unreasonable.

Data Protection and Freedom of Information

Complaints sometimes include requests for information or documentation. Such requests will either be a "subject access request" under the UK General Data Protection Regulations (UKGDPR) and/or Data Protection Act 2018 (where the information requested relates to an identifiable individual) or a request under the Freedom of Information Act 2000 (where the information is general and not related to an identifiable individual).

Subject access requests under UK GDPR/DPA must be responded to within one month, and requests under the Freedom of Information Act 2000 must be responded to within twenty school days. However, the School will aim to provide this information as soon as practicable (where the request is valid and the Complainant is lawfully entitled to the information or documentation) in accordance with the rules of natural justice.

Further details can be found in the Trust's Data Protection Policy and FOI Policy.

Retention of Records

A full written record of all complaints resolved under Stages 2 to 3 will be maintained centrally on file at the School. Records of complaints will usually be destroyed when a student reaches the age of twenty-four years or, in the case of a student with a statement of special educational needs, until the student reaches the age of thirty years. Where a complaint concerns a member of staff, records of complaints will be kept.

Confidentiality

All correspondence, statements and records relating to individual complaints will be kept confidential except where access is requested by the Secretary of State, a school inspector, or under another legal authority.

Publication

This School Complaints Policy has been ratified by the STCAT Board of Directors and acknowledged by the LACs within the Trust and will be reviewed annually. It will be published on the Trust website and on each School's website and will be provided to complainants on request by each School's office. A copy of this Schools Complaints Policy will be provided to a Complainant when a concern, difficulty or complaint is first raised.

Late Complaints

Where a complaint is submitted more than six months after the incident or event (or where the complaint relates to a series of incidents or events, more than six months from the date of the latest incident or event), the school or LAC reserves the right to refuse to investigate the complaint under this Complaints Policy if it appears reasonable and fair to do so, having regard to the circumstances surrounding the complaint.

Where the school or LAC decides that a complaint which was submitted late will not be investigated, the Headteacher, or the Clerk to the LAC, will write to the Complainant notifying them of the decision within ten school days of the complaint being received.

If the Complainant is unhappy with the decision not to investigate a complaint which was submitted late, the Complainant may write to the Chair of the LAC at the School asking for the decision to be reviewed. The Chair of the LAC will be provided with all documentation relating to the complaint, together with the letter from the School to the Complainant and will review the decision not to investigate the complaint. The Chair of the LAC will not investigate the complaint itself during this review.

The Chair of the LAC will write to the Complainant with the outcome of the review within ten school days of the date that the letter from the Complainant seeking the review was received and provide the School with a copy of the letter.

If the Chair of the LAC overturns the decision not to investigate the complaint, it will be referred to the School to be dealt with under this Complaints Policy in the usual way.

If the Chair of the LAC upholds the decision not to investigate the complaint, the Complainant may refer the concern or complaint to the Board of Directors by writing to the Clerk to the Board via the school.

In exceptional circumstances, the Chair of the LAC can delegate the responsibility for the review to the Vice-Chair of the LAC.

Persistent or Serial Complaints

There may be occasions when, despite a complaint being considered under all stages in this Complaints Policy, the Complainant persists in making the same complaint to the School. There may also be occasions when a Complainant raises unreasonable persistent complaints or raises complaints about matters which do not affect them. There may also be occasions when a complaint is made about a matter which is clearly so trivial that it would be a poor use of the Trust's resources to deal with it under the formal stages of the procedure.
In all of these cases, the Trust reserves the right to regard the complaint as persistent or serial and to refuse to investigate it under the procedure in this Complaints Policy, if it appears reasonable and fair to do so, having regard to the circumstances surrounding the complaint.
Where the School decides that a complaint is persistent or serial and will not be investigated, the School will write to the Complainant within ten school days of the complaint being raised to notify them of the decision.

If the Complainant is unhappy with the decision not to investigate a persistent or serial complaint, they may write to the Chair of The LAC to ask for the decision to be reviewed. The Chair of the LAC will be provided with all documentation relating to the current complaint, and any previous complaints which were relevant to the decision, together with the letter from the School to the Complainant and will review the decision not to investigate the complaint. The Chair of The LAC will not investigate the complaint itself during this review.

The Chair of the LAC will write to the Complainant with the outcome of the review within ten school days of the date that the letter from the Complainant seeking the review was received.

In exceptional circumstances, the Chair of The LAC can delegate the responsibility for the review to the Vice-Chair of the LAC.

If the Chair of the LAC overturns the decision not to investigate the concern or complaint, it will be referred to the School to be dealt with under the procedure in this Complaints Policy in the usual way.

If the Chair of the LAC upholds the decision not to investigate the concern or complaint, the Complainant may refer the concern or complaint to the Board of Directors by writing to the Clerk to the Board via the school. If a Director nominated by the Clerk considers the matter and decides not to investigate on the grounds that it is a persistent or serial complaint, the Schools Complaint Procedure ends at this point.

The Complainant may write to the Department for Education (DFE), using the procedure stated towards the end of this Complaints Policy. DFE will not investigate the complaint itself.

Anonymous Complaints

The School will not investigate anonymous complaints under the procedure in this Complaints Policy. Anonymous complaints will be referred to the Headteacher who will decide what, if any, action should be taken.

Appendix 1a – Stage 2 Formal Complaint Form – STCAT Schools

Please complete and *return to the School* who will acknowledge receipt and explain what action will be taken.

Your Name:	Student's Name:
Your Relationship to Student:	Student's DOB and Form:
Address and Postcode:	Daytime Telephone Number:
	Evening Telephone Number:
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 give details	
Signature:	**Date:**
For Official Use:	
Date Acknowledgement Sent:	
Name of Person Complaint Referred To:	
Signature:	*Date:*

Appendix 1b – Stage 3 Formal Complaint Appeal Form – STCAT Schools

Please complete and *return to the Clerk to Director (mgilmartin@stcat.co.uk)* who will acknowledge receipt and explain what action will be taken.

Your Name:	Student's Name:
Your Relationship to Student:	Student's DOB and Form:
Address and Postcode:	Daytime Telephone Number:
	Evening Telephone Number:
How and why do you not accept the findings made under Stage 2? (Do not repeat the matters raised in your complaint or attached documentation already provided.)	
What actions do you feel might resolve the problem at this stage?	
Are you attaching any new paperwork? If so, please give details.	
Signature:	**Date:**
For Official Use:	
Date Acknowledgement Sent:	
Name of Person Complaint Referred To:	
Signature:	*Date:*

Appendix 2: The Rules of Natural Justice

Simply put, the rules of natural justice relate to fairness. 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;
- 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 will be made on a balanced and considered assessment of the information presented;
- All decisions will be based upon logical conclusions, and not based on mere speculation or suspicion;
- All decisions will be supported by detailed reasons which will be disclosed to all parties involved.

Equality Act 2010

The Trust will deal with concerns, difficulties and complaints in accordance with its duty under the Equality Act 2010 to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between those who share a relevant protected characteristic and those who do not, by having regard to the need to:
    - remove or minimise disadvantages connected to a relevant protected characteristic; and
    - take steps to meet the different needs of those sharing a relevant protected characteristic; and
    - encourage those who share a relevant protected characteristic to participate in school life and activities in which participation is disproportionately low;
- Foster good relations between those who share a relevant protected characteristic and those who do not, by having regard to the need to:
    - tackle prejudice; and
    - promote understanding;

"Relevant protected characteristics" includes sex, race, disability, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity and (in the case of persons who are not students) age.

In addition, the Trust will comply with its duty to make the following reasonable adjustments for persons with a disability:

- Where a provision, criterion or practice places a disabled person at a substantial disadvantage compared to person who is not disabled, reasonable steps must be taken to avoid that disadvantage;
- Where a disabled person would, but for the provision of an auxiliary aid, be placed at a substantial disadvantage compared with a person who is not disabled, reasonable steps must be taken to provide the auxiliary aid.

An auxiliary aid can be a piece of equipment or a service.

If a Complainant or other person involved in the complaints procedure requires an interpreter, a signer or any other assistance at meetings or at a Complaint Panel Hearing, they should let the school know immediately.

Further details can be found in the Trust's Equality Policy.

Appendix 3 – STCAT Parent, Carer and Community – Communications Protocol

1.0 CONTEXT:

With increasing connectivity in recent years there has been a significant growth in rapid communications between all stakeholders. While this brings great benefits, it can also present challenges in matching the expectations of stakeholders with the capacity of school leaders and others to make a timely and detailed response. Further, with the rapid turn-around time of email correspondence, there is often little time to act and a risk that significant time is lost to correspondence rather than dealing with the matter at hand. This protocol aims to achieve a balance between ensuring that stakeholders have confidence that there are effective avenues to communicate with school staff while also ensuring that Academy Trust resources are applied fairly and proportionately to benefit all our children and young people.

Where communication becomes strained and expectations are not met, it can have a significant negative impact on the wellbeing of all involved, and we must do all we can to strive to manage this for all stakeholders.

2.0 PURPOSE OF THIS PROTOCOL:

2.1 It is vitally important that communication between all stakeholders is defined by the values we have defined as core to our Academy Trust. These values and associated behaviours are set out below:

VALUE	BEHAVIOUR
FAITHFILLED	INSPIRED / HOPEFUL / COMPASSIONATE / POSITIVE
TRUTHFULNESS	TRANSPARENT / HONEST / AUTHENTIC
ATTENTIVE	HUMBLE / CONCERNED
GENEROUS	SELFLESS / SERVICE
LEARNED	ACTIVELY INFORMED / RESEARCH DRIVEN
ACTIVE	VISIBILITY / WALKING WITH
INTENTIONAL	AMBITION WITH INTEGRITY

2.2 This protocol should be read in conjunction with:

- The STCAT Complaints Policy for Schools
- The STCAT Complaints Policy for the Trust
- STCAT Policy regarding unacceptable behaviour on school premises

2.3 There are times when the expectations of different stakeholders are not aligned and there are strong differences of opinion. It is important that where this is the case that stakeholders can work through differences with integrity and fidelity to the values outlined above.

The Trust Complaints protocol sets out the processes by which a complaint may be resolved.

	This protocol sets out the expectations for reasonable and fair communication regarding day-to-day issues and the steps school leaders may take where communication becomes problematic or as a solution to those occasions where difficulties arise. Nothing in this protocol prevents a parent from raising a complaint through the complaints policy should they wish to do so but many issues can be resolved through constructive communications, and we encourage stakeholders to work with us in the spirit of co-operation and the values outlined above.
3.0	**SCOPE** **Who does this protocol relate to?** This protocol relates to a stakeholder (defined as a parent, carer, or member of the public) who frequently communicates about issues, either formally or informally, or frequently raises issues that the stakeholder considers to be within the remit of the school, and whose behaviour or conduct in relation to such communications may also be deemed by school leaders to be unreasonable. A separate policy applies to how schools can respond to concerns about an individual's behaviour or conduct when they are on site, including the mechanisms to ban a person from entering a school site where appropriate.
4.0	**AIMS:** i. **Promote strong and respectful relationships between stakeholders** *The school will:* • Establish a home-school agreement that promotes a common understanding for conduct in communications • Establish ways to engage stakeholders to understand views and any concerns clearly • Carry out annual surveys to gather the views and feedback of stakeholders **ii. Promote clear expectations in respect of conduct with respect to communication** The school will: • Share expectations – including the core Trust elements set out below – with parents and carers and the wider community • Share reminders of these expectations in communication where appropriate **iii. Provide a pathway to the reasonable management of all correspondence** The school will: • Seek to adopt a staged approach to managing communication that is persistent and / or deemed excessive.

5.0	**Communication: Conduct expectations** It is expected that all stakeholders adhere to the following standards and expectations: 1. There is to be zero tolerance of abusive behaviour 2. Unnecessary personal comments or threats are never acceptable 3. All written communication should be reasonable in length – this will ensure that issues can be addressed efficiently and effectively 4. Persistent communication in circumstances where school staff have already responded to a concern or are in the process of doing so is not acceptable and damages the relationship between stakeholders. 5. Responses will be timely in the context of the nature of the issue and sensitive to the busy nature of a school community. Abusive behaviour of any kind in communications is not acceptable. Abusive behaviour may be direct or indirect. Evidence of illegal or unlawful conduct on social media or communication platforms outside of school platforms will form part of any concern that is raised, for example, where communications are an offence under the Malicious Communications Act 1988 or the Protection of Harassment Act 1997 or are defamatory in nature. While each school and the Trust invites all stakeholders to raise issues around the conduct of staff where there is a concern, stakeholders should recognise that it can be damaging for highly personal statements and comments to be made about staff online or in other communications. It is for this reason that concerns should be raised through appropriate channels and in a measured way. This will enable the Academy Trust to swiftly investigate the issues and take appropriate action where necessary. Staff across the Academy Trust are aware of the rights of stakeholders to escalate concerns to governors, Trust Directors, OFSTED, ESFA and other legal avenues. Threats of escalation or press involvement play no positive part in any meaningful partnership or resolution of a concern with the school or Trust and will not influence the actions of leaders. Stakeholders should be aware of the risk that such communication may be regarded as threatening and are asked to refrain from threatening to escalate an issue in their communications with school staff. Should a stakeholder wish to involve any third parties or regulators, the Academy Trust will respond to such correspondence in an appropriate way at the relevant time. It is challenging for school staff to adequately and effectively respond to communication that is excessive in length. Stakeholders will be asked to revisit communication that is considered by school staff to be excessive in length, identifying: - The 3 key specific points that need addressing as a matter of priority; and - The outcomes they are hoping to see for each point This will help to ensure that staff resources are focused on addressing the key issues swiftly. The expectation is that over time school and Trust leaders will address all elements within a

	communication, but that this is done in a way that is both manageable and reasonable and prioritises the key concerns. Where a significant number of issues are raised this may need to be addressed in manageable stages over a series of weeks or possibly longer. Persistent communication risks damage to the relationship between staff and stakeholders. While school staff will endeavour to respond to communications promptly, schools are very busy places and there may be safeguarding or other urgent issues that prevent a member of staff from responding to correspondence as swiftly as they may wish. Stakeholders should leave a gap of at least two full school days before contacting the school again about a message / email that goes unanswered, unless there is an urgent safeguarding issue which requires attention. The timeliness of a response to correspondence will always be determined in part by the complexity of the issue. For example, it may be necessary for the member of staff who is tasked with responding to email to liaise with one or more colleagues in order to gain further information about the issues involved. It is reasonable therefore that school and Trust leaders may set out a timeframe for response in a way that manages expectations.
6.0	**Proportionate response to persistent / vexatious / malicious communication:** Where communications are persistent, excessively long, vexatious and / or malicious, it is very likely that the Headteacher will be significantly involved and may not be regarded as impartial. Where this is the case, the Headteacher may engage a member of the Trust central team to review correspondence prior to any of the actions listed below. Stepped response to persistent / vexatious / malicious communication: **Step 1:** In the first instance, the Headteacher / Chair of Local Academy Committee will verbally inform the stakeholder that their communications considered to be becoming unreasonable / unacceptable and, if it is not modified, action may be taken in accordance with this protocol. **Step 2:** If the communications persist, the Headteacher / Chair of the Local Academy Committee will inform the stakeholder in writing that their behaviour is now considered by the school to be unreasonable/unacceptable and, therefore, falls under the terms of this protocol and that further issues will be addressed through appropriate action as set out below: Having regard to the nature of the parent/carer/member of the public's behaviour and the effect of this on the school community, the Headteacher may: • Establish 'communication windows' with the stakeholder on the issue in question to ensure correspondence remains proportionate and manageable. • Put in place a single point of contact for the stakeholder through which all correspondence must go – this may include a member of the Trust central staff where appropriate. • Block email traffic to all users except the designated person. • Take other actions as appropriate.

	Step 3: Where behaviours persist, the Headteacher / Chair of the Local Academy Committee may engage legal support: • instruct solicitors to send a cease-and-desist letter. **Step 4:** Where behaviours persist, solicitors will advise on appropriate next steps.

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