KEYSTONE
ACADEMY TRUST

Concerns and Complaints Policy

Created September 2019	
Updated by COM/CEO October 2026	Ratified by Trustees October 2026
Next Review due September 2027	

Contents

1. Introduction 3
2. Legal and Regulatory Framework 3
3. The difference between a concern and a complaint 3
4. Who can make a complaint? 4
5. Scope of this Complaints Procedure 4
6. How to raise a concern or make a complaint 6
7. Artificial Intelligence (AI) and Complaints 9
8. Anonymous Complaints 9
9. Timescales 9
10. Complaint Campaigns 9
11. Complaints received outside of term time 9
12. Resolving Complaints 10
13. Withdrawal of a Complaint 10
14. Stage 1 - Informal Complaints 10
15. Stage 2 - Formal Complaints 11
16. Stage 3 - Panel Hearing 12
17. Complaints escalated to / about the Trust, CEO or Trustee 14
18. Managing Serial, Persistent and Unreasonable Complaints or Contact 17
19. Monitoring and Learning 23
20. Appendix 1 - Complaint Form 24
21. Appendix 2 - Roles and Responsibilities 26
22. Appendix 3 – Example Decision Letter 30

1. Introduction

All schools within Keystone Academy Trust are committed to building strong, respectful partnerships with parents, carers and other stakeholders. Guided by our Christian vision of *Stronger Futures for All* and enabling everyone to experience *Life in all its fullness (John 10:10)*, we seek to create flourishing school communities founded on integrity, service, resilience and compassion.

Open and constructive relationships provide a strong basis for mutual understanding and help to prevent and resolve concerns and complaints. We are committed to listening carefully, treating everyone with dignity and respect, and responding fairly, transparently and compassionately.

This clear and accessible complaints procedure aims to ensure that concerns are resolved promptly, fairly and, wherever possible, at the point where the issue or misunderstanding arises. Its staged approach provides opportunities for early resolution and helps to prevent unnecessary escalation.

We also recognise complaints as an opportunity to reflect and improve. Lessons arising from complaints will be used to strengthen policy, practice and relationships across the trust, helping our schools and communities to flourish together.

This policy will be published on the trust website and on the website of each academy within the trust. A paper copy will be provided free of charge on request. Alternative accessible formats will be provided where reasonably required.

2. Legal and Regulatory Framework

This policy has been prepared with regard to:

- Part 7 of Schedule 1 to the Education (Independent School Standards) Regulations 2014;
- the Department for Education's *Best practice guidance for academies complaints procedures*;
- the Equality Act 2010;
- Data protection legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025 (DUAA).
- the Education and Skills Act 2008; and
- the trust's funding agreement and Articles of Association, where relevant.

3. The difference between a concern and a complaint

A concern may be defined as '*an expression of worry or doubt over an issue considered to be important for which reassurances are sought*'.

A complaint may be defined as '*an expression of dissatisfaction however made, about actions taken or a lack of action*'.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaints procedure.

Keystone Academy Trust takes concerns seriously and will make every effort to resolve the matter as quickly as possible.

If you feel unable to discuss a concern with a particular member of staff, we will respect your views and arrange for another suitable person to consider it:

- for a **school-level concern**, the Headteacher will make this arrangement;
- for a **trust-level concern**, the CEO will make this arrangement.

The same approach will apply if the member of staff directly involved feels unable to consider the concern. The person appointed may be more senior, but this is not essential. What matters is that they can consider the concern fairly, objectively and impartially.

We understand, however, that there are occasions when people would like to raise their concerns formally. In this case, Keystone Academy Trust will attempt to resolve the issue internally, through the stages outlined within this complaints procedure.

4. Who can make a complaint?

This procedure applies to complaints from parents and carers of pupils attending a Keystone Academy Trust school concerning their child. The trust will also consider complaints from other people respectfully and promptly and may use this procedure where appropriate. Complaints that are subject to separate statutory procedures, such as admissions, data protection, data access or suspensions and permanent exclusions, are outside the scope of this procedure (see the section below for further details).

5. Scope of this Complaints Procedure

This procedure covers all complaints about any provision of community facilities or services by the school or trust, other than complaints that are dealt with under other statutory procedures, including those listed below.

If your complaint covers more than one area, we will decide whether it should be considered under this procedure or under one of the alternative procedures listed below.

Exceptions	Who to contact
Admissions to schools	Concerns about admissions or school re-organisation proposals should be raised with Lincolnshire County Council.
Statutory assessments of Special Educational Needs	Concerns about statutory assessments of special educational needs should be raised with the Local Authority's Head of Service for Special Educational Needs: Katie Marsden, County Offices, Newland, Lincoln, LN1 1YL. katie.marsden@lincolnshire.gov.uk

Exceptions	Who to contact
Safeguarding and Child Protection concerns	Complaints about the school's handling of child-protection matters will be considered under the trust's safeguarding and child-protection procedures and in accordance with relevant statutory guidance. If you are concerned that a child may be experiencing abuse, neglect or cruelty, contact Lincolnshire Children's Safeguarding on 01522 782111, Monday to Friday, 8am to 6pm. If a child is in immediate danger, call 999. Concerns or allegations about a member of staff, volunteer or another person working with children should be referred to the Local Authority Designated Officer. The LADO service can be contacted on 01522 554674 or at LSCP_LADO@lincolnshire.gov.uk.
Suspensions and permanent exclusions	Further information about raising concerns about exclusion can be found at: www.gov.uk/school-discipline-exclusions/exclusions.
Whistleblowing	The trust has an internal whistleblowing procedure for employees, including temporary staff and contractors. Individuals should normally raise concerns through that procedure in the first instance. Employees and volunteers with knowledge of an academy may also make a whistleblowing disclosure to the Department for Education. Further information and the current reporting route are available in the DfE guidance on blowing the whistle about an academy. Volunteers who wish to raise a personal concern or complaint, rather than disclose wrongdoing in the public interest, should use this complaints procedure. Blowing the whistle to the Department for Education - GOV.UK
Staff grievances	Complaints from staff will be dealt with under the internal grievance procedures of Keystone Academy Trust.
Staff conduct	Complaints about staff will be dealt with under the internal disciplinary procedures, if appropriate, of Keystone Academy Trust. Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint. However, the complainant will be notified that the matter is being addressed.

Exceptions	Who to contact
Complaints about services provided by other providers who may use school premises or facilities	Providers should have their own complaints procedure to deal with complaints about service. Please contact them direct.
Data protection, subject access requests, freedom of information requests and personal data breaches	Concerns about the handling of personal data, subject access requests, freedom of information requests or personal data breaches should be raised with the trust's Data Protection Officer in the first instance. Where an individual remains dissatisfied after the trust's response, they may raise concerns with the Information Commissioner's Office (ICO). Complaints relating solely to information rights requests or personal data breaches will normally be dealt with under the trust's Data Protection Policy rather than this Complaints Policy.

The procedure will only be suspended where continuing it would prejudice another investigation or legal process, or where the relevant external body advises that it should be suspended. The complainant will be informed of the reason, the position will be reviewed periodically and the procedure will resume when it is appropriate to do so.

If a complainant commences legal action against any school or parties in connection with Keystone Academy Trust in relation to their complaint, we will consider whether to suspend the complaints procedure in relation to their complaint until those legal proceedings have concluded.

6. How to raise a concern or make a complaint

Use the flowchart below to identify the correct stage and route. A concern or complaint may be made in person, in writing or by telephone. Formal complaints must be made in writing and should be marked Private and Confidential. Complainants are encouraged to use the complaint form in Appendix 1. Where a complainant has difficulty putting their complaint in writing, the school or trust will provide reasonable assistance or make an appropriate reasonable adjustment.

To assist the school in investigating complaints efficiently, complainants are asked to provide a concise summary of their concerns and the required resolution.

For clarification, ‘school day’ means a day on which the relevant academy is open to pupils for normal teaching. It does not include weekends, bank holidays, school holidays or inset days.

START: A concern is raised

Raise the matter with the class teacher or relevant member of staff. Concerns about the Headteacher, governance or the trust follow the role-specific route below.

↓

STAGE 1: INFORMAL RESOLUTION

The staff member clarifies the concern and the outcome sought. An informal written response will normally be provided within 7 school days.

↓ **If unresolved**

STAGE 2: FORMAL COMPLAINT

Send the formal complaint to the correct person shown in the role-specific route below. Receipt will be acknowledged within 3 school days. If the complaint does not contain enough information for it to be considered, the complainant will be asked for the additional information needed. The form in Appendix 1 may be used for this purpose.

A written outcome will normally be provided within 15 school days.

↓ **If dissatisfied**

STAGE 3: PANEL HEARING

Request a panel hearing through the relevant Clerk within 5 school days of the Stage 2 outcome. The panel will have at least three people, including one person independent of the management and running of the school. This is the final stage.

↓

AFTER STAGE 3

The written decision will explain the outcome and how to contact the Department for Education if the trust has not followed its procedure or has acted unlawfully or unreasonably.

Role-specific route for Stage 2 and Stage 3 complaints

Complaint about	Stage 2 recipient	Stage 3 route
School staff member	Headteacher, via the school office	Clerk to the Governing Body, via the school office
Headteacher	Chair of Governors, via the Clerk and school office	Clerk to the Governing Body
Individual governor, Chair or Vice-Chair of Governors	Clerk to the Governing Body	Clerk to the Governing Body
Chair and Vice-Chair jointly, whole or majority of the governing body	CEO, via the trust office	Clerk to the Trust Board; panel with no prior involvement
Trust or central trust staff member, other than CEO	CEO, via the trust office	Clerk to the Trust Board
CEO or individual trustee	Chair of Trustees, via the Clerk to the Trust Board	Clerk to the Trust Board
Chair of Trustees	Vice-Chair of Trustees, via the Clerk to the Trust Board	Clerk to the Trust Board
Chair and Vice-Chair jointly, whole or majority of Trust Board	Clerk to the Trust Board, who will arrange a suitably skilled and wholly independent investigator and Stage 2 decision-maker	Wholly independent panel

The person complained about must not investigate or decide the complaint. Where the named recipient has a conflict of interest or prior involvement, another suitably skilled and impartial person will be appointed. A third party may act with appropriate consent, and reasonable adjustments will be considered where needed.

Where To Send Your Complaint

- School-level complaints: send to the relevant school office, marked ‘Private and Confidential’.
- Trust-level complaints: send to the trust office, marked ‘Private and Confidential’.

Current school, trust and Clerk contact details are published on the relevant school or trust website. If you need help putting your complaint in writing, please contact the school or trust office.

7. Artificial Intelligence (AI) and Complaints

The trust recognises that complainants may use artificial intelligence (AI) tools to assist with drafting correspondence. Complaints will not be rejected solely because AI has been used in their preparation.

However, complainants remain responsible for the content of any complaint submitted in their name. The trust may request clarification, further information, or confirmation of specific concerns where a complaint:

- is excessively lengthy, repetitive or unclear.
- contains factual inaccuracies or irrelevant material.
- includes information that appears to be misleading or generated without reference to the specific circumstances.
- refers to legislation, guidance or case law that is not applicable to the matter being raised.

The trust reserves the right to respond only to the substantive issues relevant to the complaint and may decline to address material that is vexatious, abusive, repetitive, irrelevant or outside the scope of the complaints procedure.

Where clarification is required of the content and resolution required, the complaints timescales may be paused until sufficient information has been provided.

8. Anonymous Complaints

We will not normally investigate anonymous complaints. However, the Headteacher, Chair of Governors, CEO or Chair of Trustees if appropriate, will determine whether the complaint warrants an investigation.

9. Timescales

You must raise the complaint within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

10. Complaint Campaigns

Where the trust receives a large number of complaints about the same issue, it may use a coordinated approach. This may include sending the same response to complainants or publishing a response on the school or trust website. Each complaint will be recorded appropriately, and complainants will continue to be informed of any further route available to them.

11. Complaints received outside of term time

We will consider complaints made outside of term time to have been received on the first school day after the holiday period.

12. Resolving Complaints

At each stage in the procedure, the school or trust wants to resolve the complaint. If appropriate, we will acknowledge that the complaint is upheld in whole or in part. In addition, we may offer one or more of the following:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that we will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review school policies in light of the complaint
- an apology.
- an explanation why details relating to other individuals noted in the complaint will not be shared

13. Withdrawal of a Complaint

If a complainant wishes to withdraw their complaint, we will ask them to confirm this in writing.

14. Stage 1 - Informal Complaints

It is to be hoped that most concerns can be expressed and resolved on an informal basis.

Most concerns should first be raised at Stage 1 with the class teacher or member of staff closest to the issue. Where appropriate, the matter may be referred to a senior leader or the Headteacher to help achieve an informal resolution. A complainant may proceed directly to Stage 2 where the matter is sufficiently serious, informal resolution would be inappropriate, or reasonable attempts to resolve the matter informally have already been made.

Concerns about the Headteacher, governance or the trust must follow the flowchart and role-specific route in Section 6.

After considering the concern, the Stage 1 responder will provide an informal written response within seven school days of receiving it.

If the issue remains unresolved, the next step is to make a formal complaint.

15. Stage 2 - Formal Complaints

Formal complaints must be sent in writing to the Stage 2 recipient identified in the role-specific route in Section 6. Complainants may use the complaint form in Appendix 1. If a complainant needs help to put the complaint in writing, the school or trust office will provide reasonable assistance. The person complained about must not investigate or decide the complaint.

The Stage 2 recipient identified in the role-specific route in Section 6 will ensure that the date of receipt is recorded and that the complaint is acknowledged in writing, by letter or email, within 3 school days.

The Stage 2 decision-maker will clarify the nature of the complaint, what remains unresolved and the outcome the complainant would like to see. They will consider whether a meeting would assist.

The Stage 2 decision-maker may appoint a suitably skilled and impartial person, with no prior involvement or conflict of interest, to investigate. Unless the investigator has also been formally appointed as the decision-maker, the investigator will not make the final decision.

During the investigation, the appointed investigator will:

- if necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish
- keep a written record of any meetings/interviews in relation to their investigation.

The Stage 2 decision-maker will provide a formal written response within 15 school days of the date the complaint was received.

If this deadline cannot be met, the Stage 2 decision-maker will explain the reason for the delay and provide a revised response date.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions the school or trust will take to resolve the complaint.

The Stage 2 decision-maker will explain how the complainant may request a Stage 3 panel hearing if they remain dissatisfied.

Where the complaint concerns the Headteacher or a member of the governing body, the Clerk will ensure that a suitably skilled and impartial investigator and Stage 2 decision-maker are appointed in accordance with the role-specific route in Section 6. One person may undertake both roles only where formally appointed and where they have had no prior involvement or conflict of interest.

Complaints about the Headteacher or a member of the governing body must be sent to the Clerk via the school office, marked ‘Private and Confidential’.

If the complaint is jointly about the Chair and Vice-Chair or, the entire governing body or, the majority of the governing body, Stage 2 will be escalated to the CEO of the trust.

16. Stage 3 - Panel Hearing

If the complainant is dissatisfied with the Stage 2 outcome, they may request a Stage 3 panel hearing. The panel will consist of at least three people who were not directly involved in the matters detailed in the complaint. At least one panel member will be independent of the management and running of the school. Stage 3 is the final stage of the trust's internal complaints procedure.

A request to escalate to Stage 3 must be made to the relevant Clerk identified in the role-specific route in Section 6, within 5 school days of receipt of the Stage 2 response. School-level requests may be submitted via the school office; trust-level requests must be submitted via the Clerk to the Trust Board.

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

Requests received outside of this time frame will only be considered if exceptional circumstances apply.

The Clerk will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 20 school days of receipt of the Stage 3 request. If this is not possible, the Clerk will provide an anticipated date and keep the complainant informed.
If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.

If the complaint is jointly about the Chair and Vice-Chair or, the entire governing body or, the majority of the governing body, Stage 3 will be arranged by the Clerk to the Trust Board and heard by a panel of at least three people with no prior involvement, including at least one person who is independent of the management and running of the school.

The complainant may attend the panel hearing and may be accompanied by a relative, friend or other supporter. Generally, we do not encourage either party to bring legal representatives to the panel meeting. However, there may be occasions when legal representation is appropriate. For instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

A request for legal representation should be made to the Clerk in advance. The panel will consider fairness, complexity and any disadvantage to either party when deciding whether legal representation is appropriate.

Note: Complaints about staff conduct will not generally be handled under this complaints procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 10 school days before the meeting, the Clerk will:

- confirm and notify the complainant of the date, time and venue of the meeting, making reasonable efforts to accommodate the availability of all parties and ensuring that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the panel at least 6 school days before the meeting
- provide a proforma to the complainant detailing the main points of the complaint to request confirmation these are correct and to express their desired outcome or resolution.

Any written material will be circulated to all parties at least 5 school days before the date of the meeting. The panel will decide what evidence is relevant, reliable, necessary and fair to consider. Covert recordings will not normally be accepted, but the panel may consider them where excluding the evidence would make the process materially unfair or where it raises a serious safeguarding concern. Any personal data will be handled in accordance with data-protection law.

The panel will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. The panel will not consider a new or unrelated complaint that was not considered at Stage 2. Any new complaint will be considered separately under the appropriate stage of this procedure.

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 of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The panel will consider the complaint and all the evidence presented. The panel can:

- uphold the complaint in whole or in part
- not uphold the complaint in whole or in part.

If the complaint is upheld in whole or in part, the panel will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future.

The Panel Chair will approve the panel's findings, reasons and recommendations. The Clerk will issue the approved outcome on behalf of the panel within five school days of the hearing. See Appendix 3, Example Decision Letter).

The letter to the complainant will include details of how to contact the Department for Education (DfE) if they are dissatisfied with the way their complaint has been handled by the school or trust.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions the school or trust will take to resolve the complaint.

The panel will ensure that those findings and recommendations are sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about. Furthermore, they will be available for inspection on the school premises by the complainant and the Headteacher.

A written record will be kept of all formal complaints, whether they were resolved at Stage 2 or proceeded to a Stage 3 panel hearing, and any action taken by the school or trust, regardless of whether the complaint was upheld.

All correspondence, statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

17.Complaints escalated to / about the Trust, CEO or Trustee

Complaints about the trust, central trust staff, the CEO or trustees must follow the role-specific route in Section 6. The person complained about must not investigate or decide the complaint. Where the named recipient has prior involvement or a conflict of interest, the Clerk will arrange a suitably skilled and impartial alternative.

Where a complaint concerns more than one academy, a trust-wide service, or both school and central trust personnel, the CEO or Clerk to the Trust Board will determine the most appropriate route. The complainant will be informed of the route, decision-maker and applicable timescales. No person with prior involvement or a conflict of interest will investigate or decide the complaint.

For complaints escalated to or about the trust, the Stage 2 recipient identified in the role-specific route in Section 6 will ensure that the complaint is acknowledged in writing within 3 school days. The acknowledgement will confirm that the complaint is being considered at Stage 2 and state the date by which a response will be provided.

Following the investigation, the Stage 2 decision-maker will send the complainant a written outcome within 15 school days of receipt. If this deadline cannot be met, they will explain the reason for the delay and provide a revised response date.

Complaints about the CEO, an individual trustee, the Chair or Vice-Chair of Trustees, or the whole or majority of the Trust Board will be handled by the impartial recipient and decision-maker shown in the role-specific route in Section 6. The person complained about must not investigate or decide the complaint.

Where the Chair or Vice-Chair of Trustees is the Stage 2 decision-maker, they will issue the outcome letter and provide a copy to the Clerk to the Trust Board for the complaints record.

If the complainant is dissatisfied with the Stage 2 outcome, they may ask the Clerk to the Trust Board for a Stage 3 panel hearing within 5 school days of receiving the outcome.

The Clerk will record the date the request for a hearing is received and acknowledge receipt of the request in writing (either by letter or email) within 3 school days.

Requests received outside of this time frame will only be considered if exceptional circumstances apply.

The Clerk will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 20 school days of receipt of the Stage 3 request. If this is not possible, the Clerk will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.

If the complaint is jointly about the Chair and Vice-Chair or, the whole trust board or, the majority of the trust board Stage 3 will be heard by a wholly independent panel of at least three people, arranged by the Clerk to the Trust Board. No panel member may have had prior involvement in the complaint.

For all trust-level complaints, the panel will consist of at least three people who were not directly involved in the matters complained about and had no involvement at an earlier stage. At least one panel member will be independent of the management and running of the academy trust. Where the complaint is jointly about the Chair and Vice-Chair, or about the whole or majority of the Trust Board, the entire panel will be independent of the trust.

For a school-level complaint, the independent member must be independent of the management and running of the school concerned and have no conflict of interest or prior knowledge of the complaint. This may include a governor from another school within the trust. For a trust-level complaint, the independent member must be independent of the management and running of the trust.

A person will not be treated as independent merely because they were not involved at an earlier stage. They must also be free from any relationship, interest, prior knowledge or other circumstance that could reasonably call their impartiality into question.

The complainant may attend the panel hearing and may be accompanied by a relative, friend or other supporter. Generally, we do not encourage either party to bring legal representatives to the panel meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a trust employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

A request for legal representation should be made to the Clerk in advance. The panel will consider fairness, complexity and any disadvantage to either party when deciding whether legal representation is appropriate.

Note: Complaints about staff conduct will not generally be handled under this complaints procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 10 school days before the meeting, the Clerk will:

- confirm and notify the complainant of the date, time and venue of the meeting, making reasonable efforts to accommodate the availability of all parties and ensuring that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the panel at least 6 school days before the meeting.

Any written material will be circulated to all parties at least 5 school days before the date of the meeting. The panel will decide what evidence is relevant, reliable, necessary and fair to consider. Covert recordings will not normally be accepted, but the panel may consider them where excluding the evidence would make the process materially unfair or where it raises a serious safeguarding concern. Any personal data will be handled in accordance with data-protection law.

The panel will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. The panel will not consider a new or unrelated complaint that was not considered at Stage 2. Any new complaint will be considered separately under the appropriate stage of this procedure.

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 of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The panel will consider the complaint and all the evidence presented. The panel can:

- uphold the complaint in whole or in part
- not uphold the complaint in whole or in part.

If the complaint is upheld in whole or in part, the panel will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future.

The Panel Chair will approve the panel's findings, reasons and recommendations. The Clerk will issue the approved outcome on behalf of the panel within five school days of the hearing. See Appendix 3, Example Decision Letter).

The letter to the complainant will include details of how to contact the Department for Education (DfE) if they are dissatisfied with the way their complaint has been handled by the trust.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions Keystone Academy Trust will take to resolve the complaint.

The Clerk will send the panel's findings and recommendations to the complainant and, where relevant, the person complained about.
The findings and recommendations will be available for inspection on the relevant school or trust premises by the proprietor and the Headteacher or CEO/Chair of Trustees, as applicable.

A written record will be kept of all formal complaints, whether they were resolved at Stage 2 or proceeded to a Stage 3 panel hearing, and any action taken by the trust, regardless of whether the complaint was upheld.

All correspondence, statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

18. Managing Serial, Persistent and Unreasonable Complaints or Contact

Keystone Academy Trust is committed to dealing with all complaints fairly, impartially and respectfully, and to providing a high-quality service to those who raise concerns. We will not normally limit the contact that complainants have with our schools or the trust.

However, staff should not be expected to tolerate behaviour that is abusive, offensive, discriminatory, threatening or unreasonably disruptive. The trust may take proportionate action where the frequency or nature of a complainant's contact hinders the fair and efficient consideration of their complaint, places unreasonable demands on staff time, or affects the wellbeing or safety of members of the school or trust community.

This section may also be used to manage unreasonable or persistent contact that is not directly associated with a formal complaint.

18.1 Examples of unreasonable behaviour

Behaviour may be considered unreasonable where a complainant:

- refuses to explain their complaint, the grounds for it or the outcome sought, despite offers of assistance;
- refuses to co-operate with the complaints procedure while continuing to seek resolution;

- refuses to accept that a matter falls outside the scope of this procedure;
- insists that the complaint is handled in a way that is incompatible with this procedure or with good practice;
- repeatedly changes the basis of the complaint while it is being considered;
- introduces large amounts of irrelevant or minor information and expects every point to be addressed;
- raises numerous detailed but low-priority questions and expects immediate responses or responses within timescales they have imposed;
- repeatedly raises the same or substantially similar matter after it has been properly considered;
- refuses to accept the outcome of a complaint where the trust's procedure has been fully and properly completed;
- seeks an outcome that is not realistic, lawful or within the school's or trust's power to provide;
- makes excessive demands on school or trust time through frequent, lengthy or complicated contact;
- makes unjustified complaints about staff dealing with the matter and seeks to have them removed or replaced;
- knowingly provides false or misleading information;
- makes threats or attempts to intimidate;
- uses abusive, offensive or discriminatory language or behaviour;
- uses or threatens violence;
- publishes abusive, discriminatory, threatening or knowingly false information about the complaint, the school, the trust or individuals on social media or other public forums; or
- contacts the school or trust repeatedly with the apparent intention of causing disruption or inconvenience rather than resolving a genuine concern.

A complainant will not be regarded as unreasonable simply because they are persistent, are difficult to engage with, ask complex questions, disagree with an outcome or raise a new complaint.

Complainants are asked to limit communication relating to an active complaint while it is being considered. Repeated correspondence about the same points may delay the trust's ability to reach an outcome.

The use of AI-generated content does not in itself make a complaint unreasonable. However, complainants remain responsible for the content submitted and may be asked to clarify concerns, verify factual information, or identify the specific issues they wish the trust to address and the required resolution where correspondence is unclear, excessively lengthy, repetitive, contains multiple unrelated matters, or includes inaccurate or irrelevant information. The trust will focus its investigation and response on the substantive issues raised and may manage communications in accordance with this policy where the nature or volume of correspondence places a disproportionate burden on trust or school resources.

18.2 Informal warning and opportunity to modify behaviour

Wherever it is reasonable and safe to do so, the Headteacher, Chair of Governors, CEO or Chair of Trustees, as appropriate, will first discuss the concerns with the complainant and explain:

- which aspects of their behaviour or contact are considered unreasonable;
- how this is affecting the consideration of the complaint, staff or the wider school community;
- the standards of communication and conduct expected;
- what changes are required; and
- what action may be taken if the behaviour continues.

The complainant will normally be given a reasonable opportunity to modify their behaviour before formal restrictions are imposed.

Where appropriate, the complainant may be invited to attend a meeting or asked to nominate a suitable third party, such as a representative from Citizens Advice, to communicate on their behalf.

An informal warning will not be required where there has been a serious threat, violence, harassment, discriminatory abuse or another incident requiring immediate protective action.

18.3 Decision to introduce a communication plan

If the behaviour continues, or an incident is sufficiently serious to require immediate action, the Headteacher, Chair of Governors, CEO or Chair of Trustees, as appropriate to the subject and stage of the complaint, may introduce a tailored communication plan.

The decision must be reasonable, proportionate and based on the individual circumstances. The complainant will be informed in writing of:

- the behaviour that has led to the decision;
- the reasons why the behaviour is considered unreasonable;
- any communication arrangements or restrictions being introduced;
- the date on which the arrangements take effect;

- how long they will remain in place;
- how urgent, safeguarding or genuinely new matters should be raised;
- when and by whom the arrangements will be reviewed; and
- how the complainant may request a review of the decision.

18.4 Possible communication arrangements

Depending on the circumstances, the communication plan may:

- require all contact to be made through a named member of staff or a single email address;
- limit contact to a specified method, such as email or letter;
- limit the frequency of contact, for example to a reasonable number of communications within a stated period;
- require issues to be presented together in one communication rather than through a series of separate messages;
- arrange for telephone calls or meetings to take place by appointment only;
- provide an agreed statement for staff to use when ending an abusive, repetitive or unproductive telephone call;
- state that the school or trust has fully responded to the matters raised and that the complaint, or a particular stage of it, is closed;
- confirm that further correspondence raising substantially the same points will be acknowledged but will not receive a detailed response;
- temporarily suspend direct contact with specified members of staff; or
- ask the complainant to communicate through an appropriate representative.

At least one reasonable method of communication will normally remain available. Any arrangements must allow the complainant to raise a genuinely new complaint, safeguarding concern, urgent matter or other issue requiring the school or trust to act.

Communication arrangements will not remove or restrict any service, information or support to which a pupil, parent or carer is legally entitled.

18.5 When the Trust may stop responding

The trust may decide that it is appropriate to stop providing substantive responses about a particular matter where **all** of the following apply:

- every reasonable step has been taken to consider and respond to the complainant's concerns;

- the trust's position and the complainant's remaining options have been clearly explained in writing;
- the relevant stage of the complaints procedure, or the full procedure, has been completed; and
- the complainant continues to make substantially the same points.

The case for stopping substantive responses will be stronger where:

- correspondence or telephone calls are abusive, aggressive, discriminatory or threatening;
- insulting or personal comments are made about staff;
- threats are made towards staff or members of the school community;
- the volume or frequency of contact is causing significant disruption; or
- there are reasonable grounds to believe that the contact is intended primarily to cause disruption or inconvenience.

The trust will not stop responding merely because a complainant is challenging, persistent, disagrees with the outcome or asks complex questions.

Once a decision has been made to stop providing substantive responses, the complainant will be informed in writing. Further correspondence about the closed matter may be acknowledged without a detailed reply.

18.6 New complaints and other concerns

Any genuinely new complaint will be considered on its own merits and, where appropriate, dealt with under the normal complaints procedure.

The trust will also continue to consider:

- safeguarding or child-protection concerns;
- information indicating an immediate risk of harm;
- matters requiring action under another statutory or trust procedure;
- requests for information that the school or trust is legally required to provide; and
- significant new evidence directly relevant to a previous complaint.

The use of a communication plan must not prevent the trust from acting reasonably or meeting its legal and safeguarding duties.

18.7 Aggression, threats, harassment or violence

Where communication amounts to harassment, or involves serious threats, aggression or violence, the trust may seek legal advice and may report the matter to the police.

In response to a serious incident, the trust may take immediate protective action. This may include ending a meeting or telephone call, restricting direct contact, or considering whether an individual should be barred from school or trust premises in accordance with the appropriate procedure.

The individual will normally be informed in writing of the action taken and the reasons for it, unless doing so would prejudice a police investigation, safeguarding process or legal proceedings.

18.8 Recording and confidentiality

The trust will keep an appropriate record of:

- the behaviour or pattern of contact that led to the decision;
- any warning given and opportunity provided to modify the behaviour;
- the decision-maker and reasons for the decision;
- the communication plan or restrictions introduced;
- correspondence relating to the decision; and
- each review and its outcome.

Complaint records will be retained securely in accordance with the trust's approved Records Management Policy and retention schedule. Records subject to safeguarding, legal, regulatory or litigation requirements may be retained for a longer period. Access will be restricted to those who require it for a legitimate purpose.

Personal information obtained through the operation of this procedure will be processed in accordance with UK data protection legislation, including the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025, and the Trust's Data Protection Policy. Information will only be shared where there is a lawful basis to do so and where it is necessary and proportionate.

This may include sharing information to meet safeguarding duties, respond to legal proceedings, comply with regulatory or inspection requirements, or deal with a valid information-rights request.

Information about the arrangements will only be shared with those who need it to implement or review the decision.

18.9 Review of communication arrangements

Any communication plan or restriction will be reviewed after six months, or earlier where circumstances justify an earlier review.

The review will be undertaken by an appropriate person or panel that has not been directly involved in the day-to-day management of the restricted contact. Depending on the circumstances, this may be:

- the Chair or Vice-Chair of Governors;
- the CEO or another senior trust officer;
- the Chair or Vice-Chair of Trustees; or
- a panel of three governors or trustees.

The review will consider:

- whether the arrangements remain necessary and proportionate;
- whether the complainant's behaviour or pattern of contact has changed;
- whether the arrangements should continue, be amended or be withdrawn; and
- whether normal communication arrangements can resume.

The complainant will be informed promptly in writing of the outcome. If the arrangements are withdrawn, normal contact and access to the complaints procedure will resume.

18.10 Next Steps

If you believe the school or trust did not follow its published complaints procedure, prevented you from completing the procedure, or acted unlawfully or unreasonably in carrying out its education duties, you may contact the Department for Education after completing Stage 3.

The DfE will not normally reinvestigate the substance of the complaint or overturn the panel's decision. Its role is to consider whether the trust has a compliant procedure, followed that procedure and allowed the procedure to be completed.

Further information and the relevant contact route are available through the Department for Education contact service.

19.Monitoring and Learning

The trust will monitor the number, nature and outcome of formal complaints, compliance with published timescales, recurring themes and actions arising. An anonymised summary will be reported periodically to the appropriate governing body or Trust Board. Reporting will not identify individual complainants, pupils or staff unless there is a lawful and necessary reason to do so.

20. Appendix 1 - Complaint Form

You may use this form to make a formal complaint. Alternatively, you may submit your complaint by letter or email, provided it includes the information requested below. Please send your complaint to the person identified in the role-specific route in Section 6. The school or trust will acknowledge receipt and explain what will happen next.

Your name:
Pupil's name (if relevant):
Your relationship to the pupil (if relevant):
Address: **Postcode:** **Daytime telephone number:** **Evening telephone number:**
Please give details of your complaint, including whether you have spoken to anybody at the school about it.

What actions do you feel might resolve the problem at this stage?
Are you attaching any paperwork? If so, please give details.
Signature: **Date:**
Official use
Date acknowledgement sent:
By whom:
Complaint referred to:
Date:

21. Appendix 2 - Roles and Responsibilities

Complainant

The complainant should:

- explain the concern or complaint clearly and as early as possible;
- identify what remains unresolved and the outcome sought;
- provide relevant information and respond promptly to reasonable requests for clarification or meetings;
- cooperate with the school or trust in seeking a fair resolution;
- ask for assistance or a reasonable adjustment where needed;
- treat everyone involved with dignity and respect; and
- respect the confidentiality of the complaints process.

Stage 1 responder

The Stage 1 responder will:

- listen to the concern and clarify the issues and outcome sought;
- seek an early and proportionate resolution where possible;
- refer the matter to an appropriate senior leader or the Headteacher where necessary;
- keep an appropriate record;
- provide the informal written response within seven school days; and
- explain how the complainant may make a Stage 2 formal complaint if the matter remains unresolved.

Stage 2 recipient

The Stage 2 recipient is the person identified in the role-specific route in Section 6. The Stage 2 recipient will:

- ensure that the complaint is sent to the correct person;
- record the date on which the complaint is received;
- ensure that receipt is acknowledged in writing within three school days;
- check whether there is any prior involvement or conflict of interest;
- arrange an impartial alternative where the named person cannot act; and
- confirm who will investigate and decide the complaint.

The Stage 2 recipient may also be the Stage 2 decision-maker where permitted by the role-specific route.

Investigator

The investigator will:

- be suitably skilled and impartial;

- have no prior involvement in the complaint or conflict of interest;
- clarify the scope of the complaint and the outcome sought;
- gather and consider relevant documents, records and other evidence;
- interview relevant people where necessary;
- allow those being interviewed to be accompanied where appropriate;
- keep accurate written records of meetings and interviews;
- prepare a factual report setting out the evidence, findings and any recommendations; and
- provide the report to the appointed Stage 2 decision-maker.

The investigator will not make the final decision unless formally appointed to act as both investigator and Stage 2 decision-maker.

Stage 2 decision-maker

The Stage 2 decision-maker will be the person identified or appointed under the role-specific route in Section 6. Depending on the subject of the complaint, this may be:

- the Headteacher;
- the Chair of Governors;
- another suitably skilled and impartial person appointed through the Clerk;
- the CEO;
- the Chair of Trustees; or
- the Vice-Chair of Trustees.

The Stage 2 decision-maker will:

- be impartial and free from prior involvement or conflict of interest;
- consider the complaint, investigation report and all relevant evidence;
- decide whether each element of the complaint is upheld, partly upheld or not upheld;
- give clear reasons for the decision;
- identify any appropriate action, learning or recommendations;
- issue the written outcome within 15 school days of receipt of the complaint, or explain any delay and provide a revised date; and
- explain how the complainant may request a Stage 3 panel hearing.

Clerk

For school-level complaints, “the Clerk” means the Clerk to the Governing Body. For trust-level complaints, it means the Clerk to the Trust Board.

The Clerk will:

- act as the administrative contact for the complainant, school or trust and panel;
- arrange for an impartial investigator or decision-maker where required by the role-specific route;
- acknowledge a Stage 3 request within three school days;
- arrange the panel hearing, normally within 20 school days;

- check that all panel members are impartial and have had no prior involvement;
- ensure that the panel includes the required independent member;
- confirm the date, time, venue and arrangements for the hearing;
- arrange reasonable adjustments where required;
- collect and circulate the written evidence securely within the published timescales;
- keep an accurate and secure record of the hearing, the panel's findings, decision and recommendations; and
- issue the panel's approved written outcome to the complainant and the school or trust within five school days of the hearing.

Panel Chair

The Panel Chair will:

- ensure that the hearing is fair, accessible, respectful and non-adversarial;
- explain the panel's role and procedure;
- ensure that both parties can present their case, respond to the evidence and seek clarification;
- keep the hearing focused on the complaint considered at Stage 2;
- ensure that complainants who are unfamiliar with the process are put at ease;
- ensure that, where a child or young person participates, appropriate support is agreed in advance, their views are given proper consideration and their welfare remains paramount;
- lead the panel in reaching its findings, decisions and recommendations; and
- approve the panel's written outcome, findings, reasons and recommendations before these are issued.

Panel members

The panel will consist of at least three people who:

- were not directly involved in the matters complained about;
- had no involvement at an earlier stage;
- have no conflict of interest; and
- can consider the complaint fairly and impartially.

At least one panel member will be independent of the management and running of the school or trust, as applicable. Where the complaint concerns the whole or majority of the Trust Board, or the Chair and Vice-Chair of Trustees jointly, the whole panel will be independent of the trust.

Panel members will:

- read the papers in advance;
- consider all relevant evidence;
- ask fair and relevant questions;
- make findings of fact;

- decide whether the complaint is upheld, partly upheld or not upheld;
- agree any appropriate actions or recommendations;
- give clear reasons for their findings and decisions; and
- maintain confidentiality before, during and after the hearing.

22.Appendix 3 – Example Decision Letter

For complaints panel hearing outcome

[Date]

Confidential: Complaints Panel Outcome

Dear [name of complainant],

Following the complaints panel hearing held on [date], I am writing to inform you of the panel's decision.

Your complaint was [summarise complaint].

The following evidence was considered [summarise evidence].

After reviewing the evidence and questioning those concerned, the panel has:

- upheld the complaint in whole/in part

OR

- not upheld the complaint and no further action will be taken

TEMPLATE GUIDANCE - Whatever the outcome, clearly state the reason/s for the decision reached and outline any recommendations issued to the school to achieve reconciliation and resolution.

If a complaint is upheld in whole or in part, one or more of the following may also be included:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that we will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review school policies in light of the complaint
- an apology

If you believe the school or trust did not follow its published complaints procedure, prevented you from completing it, or acted unlawfully or unreasonably in the exercise of its education functions, you may refer your complaint to the Department for Education after completing Stage 3.

The DfE will not normally reinvestigate the substance of the complaint or overturn the panel's decision. Its role is to consider whether the trust has a compliant procedure, followed that procedure and allowed the procedure to be completed.

You can submit your complaint through the Department for Education contact service or telephone the DfE helpline on 0370 000 2288, Monday to Friday, 9am to 5.30pm.

Yours sincerely, [Panel chair OR clerk on behalf of the panel]