

Shine like stars in the world.'

Philippians 2.15



St Paul's CE Primary School

Complaints Policy 2025-2026

Vision

"Our school is one family, united in love and deeply rooted in our Christian values, where together on life's journey we flourish, striving for excellence in all that we do. Inspired by the transformation of St Paul, and enlightened by the glory of God, we will shine like stars to make the world a better place."

Our Core Values

Love, Forgiveness, Faith, Friendship, Hope and Peace.

Our Complaints Policy is written in line with our school vision:

“Our school is one family, united in love and deeply rooted in our Christian values, where together on life’s journey we flourish, striving for excellence in all that we do. Inspired by the transformation of St Paul, and enlightened by the glory of God, we will shine like stars to make the world a better place.”

At St Paul’s, we encourage pupils and parents to contact us about anything related to learning and school. We welcome news about successes and important events outside of school and we appreciate feedback on all school-related matters. We hope for open, positive, solution-focussed conversations and exchanges of information and we will also provide positive feedback on the great work pupils are doing. Likewise, we hope for ‘good news’ messages from parents/carers too.

There are times when concerns need to be shared and, again, we hope for open, positive, solution-focussed conversations and exchanges of information. We are a listening school and we deal with concerns and complaints in a respectful, responsive and timely manner, always placing the pupil at the heart of everything we do.

This policy defines the different levels of concern and complaint and describes a practical, objective and step-by-step way to approach these concerns and complaints. We aim to deal with all concerns and complaints informally and within school in the first instance, however, clear steps for more formal concerns and complaints are also included here.

We appreciate that any concern or reason for complaint may be emotive – especially where there may be an upset or distressed child at the centre of the issue; all we ask is that complainants are clear in the communication, kind in the manner of dealing with the issue and patient while we address the issue. For further information, please also refer to the Parental Expectations Policy.

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1. What is a Complaint?

St. Paul's defines a **complaint** as follows:

"An expression or statement of dissatisfaction made in writing, about actions taken or lack of action."

Complaints are different from concerns. **A concern is a worry or nervous feeling about something.** A concern is often a general feeling of unease about something, a 'niggle' that is worth communicating. This is usually by raising awareness about something which causes a sense of unease. All concerns will be acknowledged, investigated and responded to.

2. St. Paul's Principles for Dealing with Complaints

The principles underlying St. Paul's Complaints Policy are informed by our Christian character and our foundation as a Church of England School where we seek to be peaceful problem-solvers. The principles are also in line with government guidelines:

- Our Complaints Policy aims to be simple to understand and use;
- Our Complaints Policy is impartial, is non-adversarial and enables a full and fair investigation;
- Our Complaints Policy, where necessary, respects confidentiality;
- Our Complaints Policy addresses all the points at issue and provides an effective response and appropriate redress;
- We are a listening school and, the Complaints Process often provides information to our senior management team so that services can be improved;
- Complaints must be made in writing –using the Complaint Form (Appendix A);
- All complaints (made by parents and/or members of the public) will be acknowledged, processed and feedback will be given to the complainant;
- Complaints will be managed within a management framework of clear time scales;
- Complaints may be made and considered initially on an informal basis. Where the parent (or complainant) is not satisfied with the response to the informal complaint, a formal procedure for the complaint can be made in writing;

- Where the parent (or complainant) is not satisfied with the response to the complaint, a hearing before a panel will take place. The panel will be appointed by or on behalf of the school and will consist of at least three people who were not directly involved in the matters detailed in the complaint. This ensures that, where there is a panel hearing of a complaint, one panel member is independent of the management and running of the school;
- Parents (or complainants) may attend and be accompanied at a panel hearing if they wish;
- The Panel will make findings and recommendations and stipulate that a copy of those findings and recommendations is:
 - provided to the complainant and, where relevant, the person complained about;
 - available for inspection on the school premises

A written record will be kept of all formal complaints that are made in line with these principles and whether they are resolved following a formal procedure, or proceed to a panel hearing. The written record will also detail the action taken by the school as a result of those complaints (regardless of whether they are upheld);

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.

3. Complaints relevant under this policy

Most complaints will be dealt with under this policy and procedure, however, some complaints relating to separate statutory procedures will be dealt with under the following policies:

- Admissions – complaints are dealt with as part of the appeals process outlined in the Admissions Policy.
- Child protection and Safeguarding – complaints linked to child protection and safeguarding will be dealt with in line with internal and external procedures outlined in the Safeguarding Policy.
- Exclusion – complaints about exclusions and/or suspensions will be dealt with in line with the procedures outlined in either the Behaviour for Learning Policy and/or the Exclusion Policy.
- Statutory assessments of special educational needs – complaints about statutory SEND assessments are dealt with by the SEND teams in the relevant local authority
- Staff conduct – depending on the nature of the complaint, staff conduct complaints may be subject to internal disciplinary procedures or external investigations under the jurisdiction of the Local Area Designated Officer.

- Complaints about services provided by other supplier who may use school premises or facilities – complainants will be directed to follow the external provider's own complaints procedure (eg. providers who hire the academy facilities).
- Withdrawal from the curriculum: Parents and carers can withdraw their child from any aspect of Religious Education (RE), including the Daily Act of Collective Worship (DACW). They do not have to explain why. If parents or carers are not satisfied with the handling of a request to withdraw their child from RE or the DACW, the complaints procedure should be followed. NB. The right of withdrawal does not apply to other areas of the curriculum where religious matters may be spontaneously raised by students or arise in other subjects such as history or citizenship.

Internal complaints are dealt with in line with the following staff-related policies:

- Whistleblowing – referred to the internal whistleblowing procedures outlined in the Whistleblowing Policy.
- Staff grievances – referred to the internal grievance procedures outlined in the Grievance Policy.

The Complaints Policy will also not cover complaints which are, or have been, the subject of legal proceedings, or complaints being considered by the Secretary of State for Education under any statutory power.

If a complainant commences legal action in relation to their complaint, we will suspend the complaints process until the legal proceedings have concluded. An investigation would only go ahead in these circumstances if those proceedings did not address the issue(s) at the heart of the complaint.

Anonymous complaints will not normally be investigated, save in exceptional circumstances, as St. Paul's would be unable to respond to the complainant.

Evidence in the form of recordings of conversations that were obtained covertly and without the informed consent of all parties being obtained will not normally be accepted by the School – doing so may well contravene its obligations under the UK-GDPR and Data Protection Act 2018.

4. The Stages of Handling a Complaint

Complaints should be brought to the attention of the school as soon as possible. A complaint made more than three months after the event has taken place will not be considered, save in exceptional circumstances.

To be compliant with the DFE 2021: Best Practice Guidance for School Complaints Procedures, our complaints procedure consists of the three required stages:

- Stage 1: Informal (usually a meeting with the complainant)
- Stage 2: Formal (the complaint is put in writing)
- Stage 3: A panel hearing, with an independent panel member

5. Record-keeping

A written record of all complaints will be made. It will be noted whether the complaint has been resolved following a formal procedure, or proceeded to a panel hearing. There will be a written record of any action taken by the school as a result of the complaint (regardless of whether the complaint is upheld). This will include:

- recording the progress of the complaint and the final outcome
- recording whether the case progressed to a panel hearing
- recording any action taken by the school or the federation, regardless of outcome.

No live video/voice recordings are to be made of meetings held (by either side) unless consented to by all parties. The appropriate person dealing with the complaint is responsible for these records and for making sure the data is kept secure. Information will be kept secure in line with ICO guidelines for retaining data (3 years in this instance)

If a complainant is still not satisfied with the outcome when the complaint has been through all three stages, the complainant may complain directly to the Department for Education (DFE) Anyone can raise a complaint about a school or a member of the school's staff to the DFE. Before escalating a school complaint to the DFE, they expect that complainants will have completed local complaints procedures first. The DFE contact form clearly explains this and advises complainants to complete local procedures before submitting their complaint. <https://www.gov.uk/complain-to-dfe>

6. Where to Send Your Complaint

Complaints should be sent in accordance with the following table:

| Complaints Relating to: | Send Complaint to: | Stage 1 (informal) investigation to be led by: | Stage 2 (formal) investigation to be led by: |
|---|--|---|---|
| Progress, behaviour or welfare of a child | School Office where it will be forwarded to the relevant Teacher | Teacher | Senior Leader |
| Member of staff | Head of School | Head of School or Executive Headteacher | Executive Headteacher |
| Professional conduct of the Head of School or Executive Headteacher | Chair of Governors | Chair of Governors | A Panel Hearing |
| Member of the Governing Board | Clerk to the Governing Board | Chair of Governors | A Panel Hearing |

| | | | |
|---|------------------------------|--|--|
| The Chair of Governors or the Governing Board | Clerk to the Governing Board | To be advised by the London Diocesan Board for Schools | To be advised by the London Diocesan Board for Schools |
|---|------------------------------|--|--|

7. Stage 1: Making an informal complaint

Complainants can initially raise the complaint in person, in writing or via a phone call with the appropriate person to resolve their initial complaint – please refer to the table in section 5 to identify the appropriate member of staff although **this is generally the Class Teacher. The informal complaint will be acknowledged within 2 school days**, investigated and, if resolved satisfactorily at this stage, the procedure will be completed.

A mutual resolution to informal complaints should be reached **within 8 school days of notification of the complaint**. The complainant and the relevant member of staff should discuss the issue in a respectful and informal manner, to seek a mutual resolution.

The member of staff will make a written record of the complaint that was raised and the date on which it was received. If the complainant is not satisfied, they will be advised to proceed to make a formal complaint. We will not consider/complaints about the following;

- Complaints about internal management decisions of the school e.g. class and teacher allocations
- school session time changes.

These decisions have been made with the full consideration and support of the Governing Board.

8. Stage 2: Making a formal complaint

Should a complainant feel that their concern has not been resolved through the informal complaints stage, they can escalate that complaint to a formal complaint. This should be done **within ten school days** of the response having been received from the member of staff investigating it at Stage 1, otherwise the complaint will be closed. **A Stage 2 complaint will usually be addressed by a member of the Senior Leadership Team.**

The formal complaint should be made by using the Complaint form (Appendix A) available on the St. Paul's website. It will be acknowledged **within 2 school days**.

Anonymous complaints will not normally be investigated, save in exceptional circumstances, as St. Paul's would be unable to respond to the complainant. These circumstances could include serious concerns such as child protection issues or bullying allegations, where the school may be required to involve appropriate external agencies or might conduct an internal review.

Any complaints received outside of term time or on the last day of term, will be acknowledged within two school days of the term recommencing.

The school reserves the right not to consider certain unreasonable or persistent complaints (section 14) but will confirm in writing their reason for not investigating the complaint within 5 school days.

A written response which sets out St. Paul's findings and recommendations will be sent to the complainant **within a target period of 15 school days**. Where the nature of the investigation is such that the complaint cannot be resolved within these timescales, a holding response will be sent giving an indication of the date on which a response will be made.

9. Stage 3: Panel hearing

Should a complainant feel that their concern has not been resolved through Stage 2, the formal complaints stage, they can escalate that complaint to a stage 3 review. This should be done within ten school days of the Stage 2 response having been received, otherwise the complaint will be closed. The Panel will consist of three members. One of these will be independent of the management and running of the school i.e., not a governor or an employee of the school. None of the Panel members will have been involved in the incidents or events which led to the complaint or have been involved in dealing with the complaint at Stage 2, or have any detailed prior knowledge of the complaint. The panel will appoint a Chair from amongst their members.

The request for escalation should be made in writing, or in person. If written notes are made, they should be signed as a formal complaint by the complainant and the complainant should identify what aspects of their complaint remain unresolved and why, and what steps would resolve this. The request should be addressed to the Clerk to the Governing Board at St. Paul's and handed to the school office.

All Stage 3 complaints will be acknowledged in writing within five school days.

Any complaints received outside of term time will be acknowledged within five school days of the term recommencing.

We aim to convene a panel hearing meeting within 20 school days of receipt of the Stage 3 request, if this is not possible the complainant will be advised in writing and will be provided with an anticipated date. Confirmation of the date, time and venue of the hearing will be sent to all parties at least 5 school days before the meeting.

All evidence should be received at least 4 school days before the meeting and the papers circulated to all parties 3 school days before the meeting.

Prior to the hearing, the clerk will have written to the complainant informing them of how the review will be conducted. The headteacher and the chair of governors will also have a copy of this letter.

At the hearing, all participants will be given the opportunity to put their case across and discuss any issues. The meeting will allow for:

- The complainant to be present and accompanied at the hearing if they wish.
- The complainant to explain their complaint to the panel and the panel to meet with the school representatives to investigate.
- Any evidence, including witnesses who have been previously approved by the chair of the panel, to be questioned.
- Members of the panel to question both the complainant and the individual/s about whom the complaint was made. This can be carried out remotely and separately.
- Final statements to be made by the panel.

Neither the complainant nor the school will bring legal representation to this hearing, unless in exceptional circumstances, where this will be agreed beforehand. A member of staff who may be a witness to the complaint can bring a union representative or legal representative if desired; this will be agreed before the hearing. The purpose of the panel hearing should be:

- reconciliation
- to put right things that may have gone wrong

The panel will make findings and recommendations. A copy of those findings and recommendations will be provided to the complainant in writing within 15 school days and, where relevant, the person complained about; the findings will be available for inspection on the school premises by the Federation's Governing Board and the Head of School. The complainant will be informed of any further rights of appeal. Copies of the minutes will be issued to the complainant and the person complained about, subject to any necessary redactions under the Data Protection Act 2018 and the UK GDPR.

The School reserves the right not to consider certain unreasonable or persistent complaints (section 13) but will confirm in writing their reason for not investigating the complaint within 5 school days.

10. Confidentiality

All complaints are to be treated as confidential and are only to be shared with those directly involved. Complainants should not share the content and nature of the complaint outside of those directly involved whether verbally, in writing or via social media. If they do so, then the complaint may be dealt with under S.14 below.

St. Paul's will keep a written record of all formal complaints, which indicates at which stage they were resolved. The written record will include action taken by the Federation/St. Paul's as a result of the complaint (regardless of whether they are upheld).

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 the Education Act 2005, requests access to them.

However, it should be noted that if any action taken by a member of staff is the subject of a complaint, the employee should be advised of the complaint made against them, and they

should be given the opportunity to respond to the complaint as part of the investigation process. Any HR processes or procedures followed as a result of the complaint will be confidential.

All confidential information will be securely maintained by St. Paul's on its premises in line with the School's Data Protection Policy, Privacy Notices, Data Retention Schedule, and in line with the requirements of current Data Protection Legislation.

11. Investigating the Complaint

The individuals leading each of the stages of the Complaint Procedure may delegate the investigation to an appropriate senior member of staff who has no connection with the complaint or in some circumstances they may commission an external investigating officer. The resolution of the complaint and a decision about any action to be taken rests with the individuals identified as responsible for each stage (as per section 6 above).

The person(s) investigating the complaint must make sure that they:

1. clarify the nature of the complaint and what remains unresolved;
2. establish what has happened so far, and who has been involved;
3. meet with the complainant or contact them (if clarification or further information is necessary);
4. ascertain what the complainant feels would put things right;
5. maintain an open mind;
6. conduct the investigation, analysing any relevant documents and interviewing those who may be involved;
7. in the event an employee is responding to a complaint, they are entitled to be accompanied by a work colleague or trade union representative;
8. keep written records of the investigation.

The School will retain written records of all the parts of the investigation at each stage, including notes of all meetings, interviews, discussions, and telephone calls, in case the complaint is taken further.

12. Resolving the Complaint

At each stage in the procedure, the School will keep in mind ways in which a complaint can be resolved. It may be sufficient to acknowledge that the complaint is upheld in whole or in part. Alternatively, the complaint may not be upheld. This may be because there is insufficient evidence to substantiate the complaint. To support the resolution, it will usually be appropriate to offer one or more of the following:

1. an apology (which does not imply liability);
2. an explanation (for example, where the complaint is not upheld);
3. an admission that the situation could have been handled differently;
4. an explanation of the steps that have been taken to ensure that it will not recur;
5. an undertaking, if necessary, to review policies or procedures in light of the complaint.

Where, as a result of the complaint, the School takes actions that are themselves confidential, it may be necessary to inform the complainant that the matter has been fully investigated and that the appropriate procedures are being followed (for example where staff disciplinary procedures are being followed).

13. Unreasonably Persistent Complainants and Unreasonable Complainant Behaviour

There are rare circumstances where the School will deviate from the Complaints Procedure. These include, but are not necessarily limited to:

1. where the complainant's behaviour towards staff, members of the School's Governing Board is unacceptable, for example, is abusive, offensive or threatening;
2. where the complainant publishes unacceptable information on social media or other public forums;
3. where, because of the frequency of their contact with the School, the complainant is hindering the consideration of their or other people's complaints, and/or the proper running of the School;
4. where the complainant's complaint is clearly vexatious and/or has patently insufficient grounds;
5. where the complainant's complaint is the same, similar to, or based on the same facts of a complaint which has already been considered in full by the School;
6. where the complainant pursues a valid complaint, but in an unreasonable manner e.g., refuses to articulate the complaint, refuses to cooperate with the complaint procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and time frames set out;
7. Seeks unrealistic outcomes, or a solution that lacks purpose or value.
8. If a complainant commences legal action in relation to their complaint, we will suspend the complaints process until the legal proceedings have concluded. An investigation would only go ahead in these circumstances if those proceedings did not address the issue(s) at the heart of the complaint.

In these circumstances, the School may:

a. inform the complainant that their behaviour is unacceptable or unreasonably persistent and ask them to change it;

b. restrict the complainant's access to the School, e.g. requesting contact in a particular form (for example, letters only), requiring contact to take place with a named person only, restricting telephone calls to specified days and times, or banning the complainant from the School's premises;

c. conduct the Complaints Panel on the papers only, i.e. not hold a hearing;

d. refuse to consider the complaint and refer the complainant directly to the Department for Education.

In all cases, the School will write to advise the complainant why their behaviour is believed to be unacceptable or unreasonably persistent, what action the School are taking, and the duration of that action.

Where the behaviour is so extreme that it threatens the immediate safety and welfare of staff the Head of School/Executive Leadership, team members will consider other options, for example, reporting the matter to the police or taking legal action. In such cases, the School may not give the complainant prior warning of that action.

14. False, vexatious or malicious complaints

All concerns or complaints raised will be taken seriously. Where there is evidence of false, vexatious or malicious concerns or complaints, we reserve the right to act appropriate to the circumstances.

Whilst there may have been upsetting or distressing circumstances leading up to a complaint being made, we will not tolerate abusive, offensive or threatening behaviour towards anyone in the school community. In such circumstances we reserve the right to amend or end this process and to contact the police as appropriate to the circumstances.

We will not normally limit an individual's right to raise concerns or complaints, however, there may be times when the frequency or nature of the complaints require us to amend or end an individual's right to make complaints.

Whenever possible, we will discuss any concerns with the complainant informally before considering their complaints or behaviour to be unreasonable or vexatious.

Any changes to this process in these circumstances will not impact any statutory rights of a complainant.

15. Collective complaints and complaint campaigns

Multiple similar complaints

On occasion, we may become the focus of a campaign and receive large volumes of complaints that are all based on the same subject and/or are from complainants unconnected with the school.

In such exceptional circumstances, we may decide to send a template response to all complainants and/or publish a single response on our website. This will depend upon the nature of the issue and all the prevailing circumstances at the time.

We reserve the right to determine when complaints should be grouped together based on the circumstances.

Complaints raised on behalf of multiple complainants

In cases where a collective complaint is raised on behalf of multiple complainants, all individuals who are part of the complaint must be clearly identified and either provide their explicit consent or be signatories to the complaint submission. This ensures transparency, confirms their agreement to be represented in the matter, and allows for a fair and consistent resolution process.

We reserve the right to verify the participation of all named employees before proceeding with the complaint investigation.

16. Next Steps

If a complainant is still not satisfied with the outcome when the complaint has been through all three stages, the complainant may complain directly to the Department for Education (DFE). Anyone can raise a complaint about a school or a member of the school's staff to the DFE. Before escalating a school complaint to the DFE, they expect that complainants will have completed local complaints procedures first. The DFE contact form clearly explains this and advises complainants to complete local procedures before submitting their complaint.

Appendix A. Complaint Form

Please complete and return to the school office (office@st-pauls.enfield.sch.uk)

| |
|--|
| Your name: |
| Pupil's name: |
| Your relationship to the pupil (if relevant) |
| Address: |
| Postcode: |
| Contact Telephone number: |
| Nature of complaint: Either Stage 1 Informal Complaint OR Stage 2 Formal Complaint* (If this is a Stage 2 Formal Complaint, please specify who dealt with this at a Stage 1 Informal level) |
| Please give details of your complaint, including whether you have spoken to anyone 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: |

Appendix B Stages of our Complaints Policy

