We are an ambitious and inclusive Trust of schools
Strengthening communities through excellent education.

Complaints Policy

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Policy Statement

1.1 We are an ambitious and inclusive Trust of schools strengthening our communities through excellent education. We are committed to providing excellent education for every child, every day, and aim to strengthen and work with our communities.

1.2 This policy is based on our values of collaboration and building trust with the school community and the Trust's commitment to complaint resolution and reconciliation at the earliest opportunity.

1.3 When concerns are raised, we recognise that parents and carers may feel anxious or emotional, particularly where their child is involved. The Trust values its relationship with parents, carers, and our local community and our approach is to listen carefully, respond respectfully and work together to resolve issues wherever possible before they escalate. We are also happy to receive suggestions and comments outside of this complaints policy, as this can help us to identify areas of success where we can make improvements.

1.4 The Trust is committed to ensuring that its complaints procedure is accessible, fair and inclusive for all, and that no individual is disadvantaged based on protected characteristics, disability, socio-economic background or cultural differences.

2.0 Scope and purpose

2.1 This policy sets out the framework for how complaints are managed for all the schools within the Ted Wragg Multi Academy Trust (the Trust). While complaints are ordinarily managed at school level, the Trust retains oversight and responsibility for escalation, governance panels and final decision-making. The Trust reserves the right to alter this process, in exceptional circumstances.

2.2 We encourage complaints to be raised informally at the earliest opportunity and in a constructive manner, and every effort will be made to resolve the matters as quickly as possible before progressing. However, if this is not possible the procedures in this policy should be followed.

2.3 This policy also covers complaints relating to the handling of personal data ("data protection complaints"). These may arise where an individual is dissatisfied with how the Trust or its schools have processed personal data, including responses to subject access requests, data breaches, or other data protection rights.

2.4 Data protection complaints will be managed within this policy framework alongside existing processes such as subject access request (SAR) reviews or data breach procedures. The Trust does not operate a separate data protection complaints policy but ensures that all such concerns are recognised, recorded and handled in line with data protection law.

2.5 Some complaints are dealt with under statutory policies and therefore not included in this policy as set out in **Appendix 6** under the headings of:

- Admissions to schools
- Statutory Assessments for special educational needs
- Matters likely to require a Child Protection Investigation
- Exclusion of children from school
- Whistleblowing
- Staff grievances
- Staff conduct
- Complaints about services provided by other providers who may use school premises or facilities.
- Withdrawal from the curriculum

2.4 We consider 3 months to be an acceptable time frame in which to raise a complaint.

3.0 Definition

For the purpose of this document the Ted Wragg Multi Academy Trust is referred to as the Ted Wragg Trust, TWT or the Trust.

4.0 Legal Framework

4.1 It is a requirement of the Education (Independent School Standards) Regulations 2014 Part 7 that a complaint procedure be in place for all the academies within the Trust. The model policy from the Department for Education has been used to inform the processes set out in this policy.

4.2 The Trust publishes the complaint procedures under Section 29(1)(b) of the Education Act 2002. The number of formal complaints is also published on the Trust website.

4.3 There is no legal framework for the complaint procedures, they are in accordance with administrative law principles and is a mechanism for conflict resolution and decisions made are lawful, rational, reasonable, fair and proportionate.

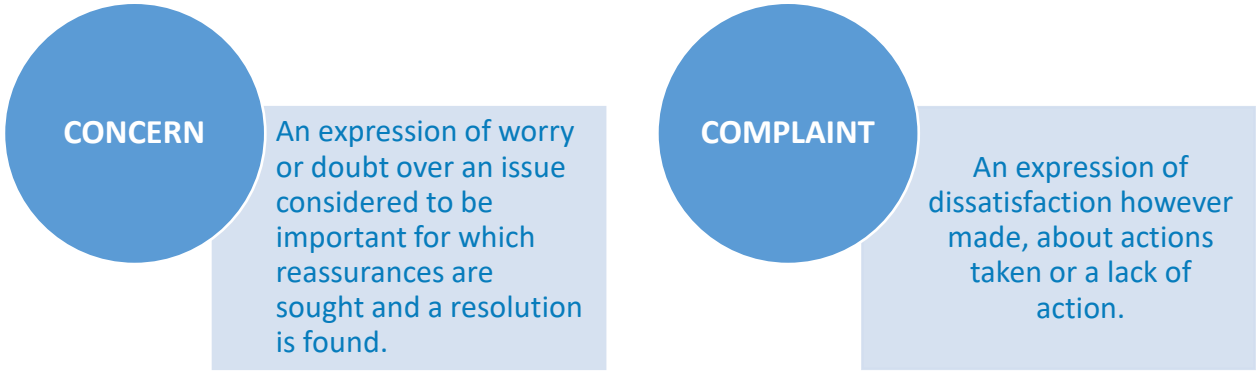
5.0 Who can make a complaint?

5.1 This complaints procedure is not limited to parents or carers of children that are registered at a school within The Trust. Any person, including members of the public, may make a complaint to the school or Trust about any provision of facilities or services that it provides.

5.2 The complaints procedure will be followed with the exception of those where we have to adopt the separate statutory procedures as outlined in Appendix 6.

6.0 The difference between a concern and a complaint

6.1 Raising a concern informally will never disadvantage a complainant. Parents are encouraged to speak directly with the school wherever possible, as many issues can be resolved more quickly and positively through conversation.



The Trust and its schools take concerns seriously and will make every effort to resolve the matter as quickly as possible. At any stage informal resolution can be found and the complaint process closed. Not all expressions of dissatisfaction are formal complaints. The school may consider whether the issue raised constitutes feedback, a concern, or a complaint and will communicate this clearly when acknowledging the matter.

6.2 In the first instance, any concerns should be raised directly with a member of school staff.

If you have difficulty discussing a concern with a particular member of staff, please contact the school's complaints coordinator, who will refer you to another staff member. Similarly, if the member of staff directly involved feels unable to deal with a concern, the school's complaints coordinator will refer you to another staff member. The member of staff may be more senior but does not have to be.

The staff member must have the ability to consider the concern objectively and impartially and this is more important. Mediation may also be considered at any stage if trust in a relationship has broken down.

6.3 If resolution is not found from raising your concerns, this complaints procedure framework is in place to enable you to take this formally to stage 2 for the attention of the school's complaints co-ordinator. The school will attempt to resolve the issue using this process.

We understand however, that there are occasions, due to the nature of the complaint when people need to raise their concerns formally at stage 2.

7.0 How to raise a concern or make a complaint

7.1 **A concern or informal complaint** can be made in person, in writing or by telephone. They may also be made by a third party acting on behalf of a complainant, as long as they have provided appropriate consent to do so.

Concerns are taken very seriously, and we pledge to acknowledge all concerns raised within **3 school term time days**.

All safeguarding concerns will be dealt with as a matter of priority in accordance with school safeguarding policies.

7.2 **Formal complaints must** be made in writing and wherever possible via the complaint form which can be found here: Complaint Form.

7.3 Complaints that relate to how effectively an individual has responded to the concerns raised will be addressed under the complaints policy. However, if the complaint is in relation to an individual's conduct, whilst this will be investigated, any outcome would be addressed under HR policies and procedures as noted in **Appendix 6**.

7.4 Complaints should not be made to individual governors as the school will be best placed to investigate and resolve any concerns or issues. Should a governor get involved it would prohibit their involvement in a stage 3 Governor Appeal Panel as they would be familiar with the complaint being presented.

7.5 If the Trust receives complaints as part of a focused campaign and receive large volumes of complaints based on the same subject or from complainants unconnected with the school, the Trust will publish a single response on the school website or send a template response to all complainants.

7.6 Complaints against staff are managed by the Headteacher. Complaints about the Headteacher are managed by the Deputy CEO of the Trust. Complaints about Governors are managed by the Deputy CEO of Trust. All complaints must be made in writing and wherever possible via the complaint form which can be found here: Complaint Form

7.7 Complaints about how personal data has been handled can be raised through the same routes set out in this policy. These may include concerns about: data sharing, SAR handling, data accuracy, retention, or suspected data breaches. You can also make a complaint direct to our external Data Protection Officer and links can be found on the "Contact Us" page of both the School and Trust websites.

Where correspondence includes multiple elements (e.g. complaint, SAR, breach concern), the Trust will identify and manage each element under the appropriate process and ensure the complaint element is recognised and recorded. The Trust may seek clarification where necessary but will not delay action where a concern can reasonably be identified.

8.0 Complaints Form

8.1 To ensure we fully understand the complaint, we encourage complainants to use the Complaint Form.

8.2 Support to raise concerns is available at any stage of this process. In addition, if you require help in completing the form, please contact the school office or complaints coordinator in your school. You can also ask a third-party organisation for example like the Citizens Advice to help you. In accordance with equality law, we will consider making reasonable adjustments if required, to enable complainants to access and complete this

complaints procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint, holding meetings in accessible location and providing translation and/or interpreter services where needed.

9.0 Resolving complaints

9.1 At each stage in the procedure, the school will want to resolve the complaint. Our approach to resolving concerns and complaints is:

- Listen without judgment and seek to understand the underlying concern
- Acknowledge the complainant's perspective, even where facts are disputed
- Be open about what the school can and cannot do
- Agree clear next steps and timescales
- Follow up and close the loop

9.2 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

10.0 Handling Data Protection Complaints

10.1 When handling complaints relating to personal data, the Trust will:

- Pause and assess the concern regardless of tone or format
- Classify the elements (complaint, SAR, breach etc.)
- Acknowledge receipt in line with required timeframes
- Establish the facts and review relevant evidence
- Provide a clear outcome including findings and actions

10.2 The Trust will focus on the substance of the issue rather than the format, including where complaints appear legalistic or AI-generated.

11.0 Anonymous complaints

11.1 We will not normally investigate anonymous complaints. However, if appropriate, we will determine whether the complaint warrants an internal investigation.

12.0 Timescales

12.1 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.

12.2 We will consider complaints made outside of this time frame if exceptional circumstances apply.

12.3 Where a complaint relates to personal data, the Trust will acknowledge receipt within 30 calendar days, investigate without undue delay, keep the complainant informed where matters are complex, and provide a clear outcome once complete. These requirements operate alongside existing complaints timescales.

13.0 Complaints received outside of term time

13.1 We will consider complaints made outside of term time on the first school day after the holiday period.

14.0 Managing unreasonable behaviour of those raising concerns/complaints

14.1 The Ted Wragg Trust and its schools are committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who raise a complaint.

14.2 We will not normally limit the contact complainants have with our schools. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive or threatening.

14.3 The Managing Unreasonable Behaviour Policy is to define what is meant by serial and unreasonable complaints and the actions which will be taken in these cases. This policy should only be employed by exception based on the complaints meeting the criteria defined in the policy. These measures will only be considered after reasonable efforts have been made to resolve the issue.

15.0 Withdrawing a complaint

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

16.0 Record keeping

16.1 A written record will be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing, along with what actions have been taken, regardless of the decision.

16.2 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.

16.3 For data protection complaints, the Trust will also record:
- the nature of the concern
- key dates including acknowledgement and response
- any linked processes (e.g. SAR or breach logs)
- evidence considered
- outcome and learning points

Where appropriate, complaint records will cross-reference other logs to demonstrate a clear audit trail.

17.0 Staff Training

17.1 Each school has a nominated Complaints Lead who is appropriately trained in the management and handling of complaints.

18.0 Escalation of Data Protection Complaints

18.1 If a complainant remains dissatisfied with the outcome of a data protection complaint, they may escalate the matter to the Information Commissioner's Office (ICO). The ICO expects concerns to be raised with the organisation first.

19.0 Appendices

The following pages set out the different stages for raising a complaint within this framework:

Appendix 1 Stage 1 Informal Complaint (concern) Process

Appendix 2 Stage 2 Formal Complaint Process

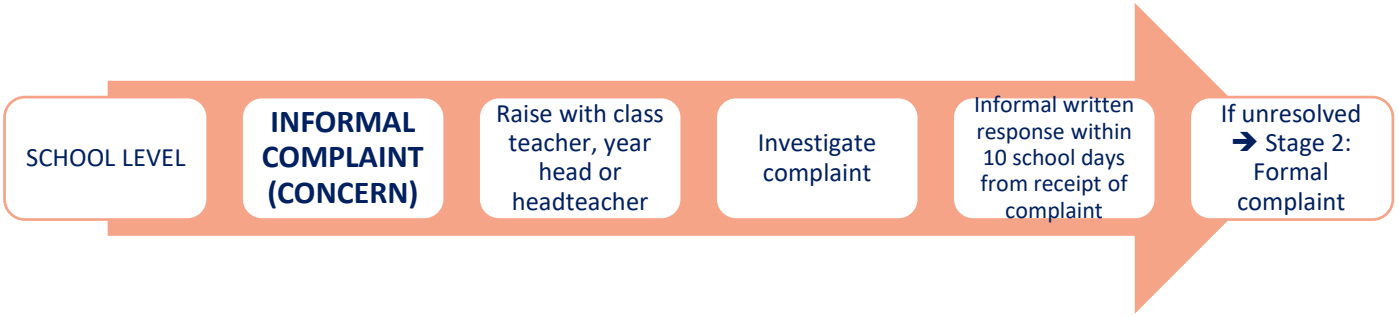
Appendix 3 Stage 3 Local Governor Panel Hearing

Appendix 4 Complaints against the Trust

Appendix 5 Complaints Process Timeline

Appendix 6 Scope of the Complaints Policy

Appendix 1: Stage 1 Informal Complaint (concern) Process



- It is to be hoped that most concerns can be expressed and resolved on an informal basis at school level.
- Concerns should be raised with either the class teacher, year head / subject head or Headteacher where holding that conversation can produce timely resolution.
- **In some circumstances, the school may enter the complaint as a formal complaint (stage 2) due to the serious nature of the concerns raised. The school's complaints co-ordinator will confirm this when the complaint is acknowledged.**
- Mediation may also be considered if trust in a relationship has broken down.

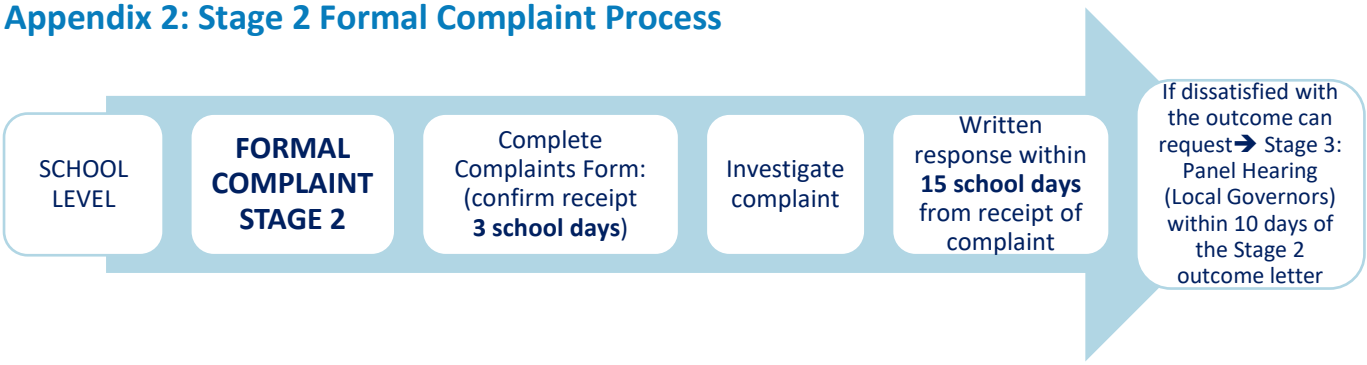
At the conclusion of their investigation, the appropriate person investigating the complaint will provide an informal written response within **10 school term time days** of the date of receipt of the complaint.

Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis and it may also prevent them from considering complaints at stage 3 of the procedure.

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

(Stage 2 of the Complaints Procedure)

Appendix 2: Stage 2 Formal Complaint Process



Where possible formal complaints must be submitted in writing, using our complaints form, which can be found here Complaint Form. Completing this form will enable us to deal with your complaint as efficiently as possible.

If there is any reason why you cannot complete this form, please discuss an alternative option with the school complaints coordinator.

The school may seek to clarify more information about the nature of the complaint; ask what remains unresolved and what outcome the complainant would like to see. The head teacher can consider whether a face to face meeting is the most appropriate way of doing this.

Acknowledgement

The school will acknowledge receipt of the complaint within **3 school term days**

→

Investigation

A designated investigator will be appointed

A formal response within **15 school term days** from the receipt of complaint

The Headteacher, or other appropriate person, may delegate the **investigation** to another member of the school's senior leadership team but not the decision to be taken.

During the investigation, the Headteacher (or designated 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 meeting/interviews in relation to their investigation and complete an investigation report and outcome

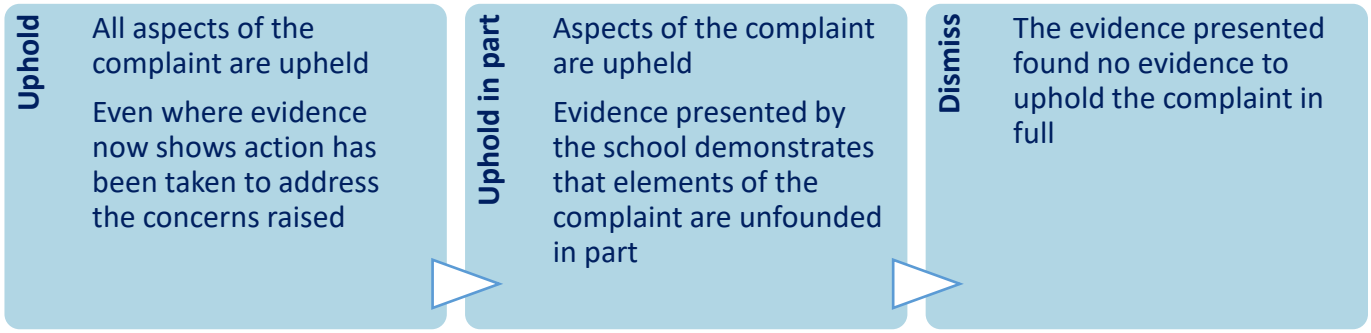
→

Provide a written response to the complainant within **15 school term time days** of the date of receipt of the complaint notification

If the deadline of 15 school term days cannot be met, the investigator will provide the complainant with an update and a revised response date.

The written 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.

The outcome of any complaint will be set out under a possible three outcomes:



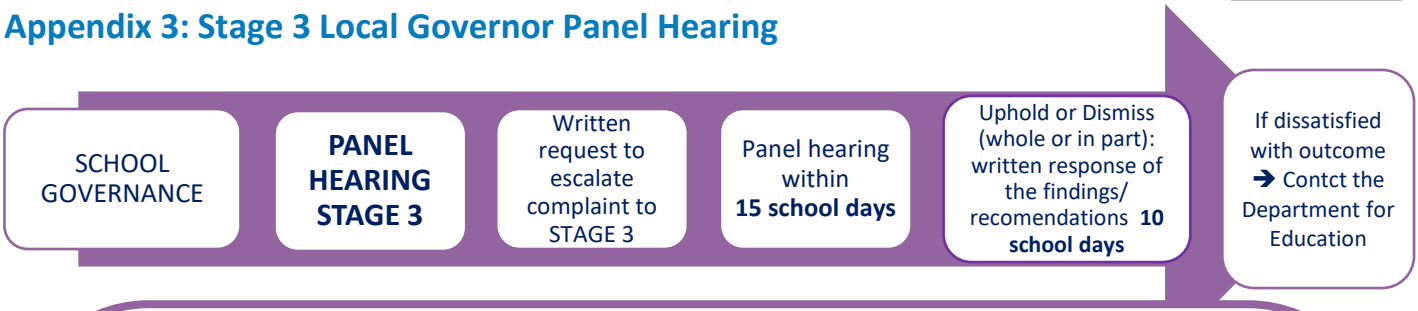
The Headteacher will advise the complainant of how to escalate their complaint should they remain dissatisfied with the outcome of stage 2.

(**Stage 3 of the Complaints Procedure – Local Governor Panel Hearing**)

All correspondence statements and record 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.

Where the complaint is about the Headteacher or a member of the governing board, it must be sent to the Trust Lead for Complaints & Compliance at Complaints@tedwraggtrust.co.uk

Appendix 3: Stage 3 Local Governor Panel Hearing



- If the complainant is dissatisfied with the outcome at stage 2 and wishes to take the matter further, they can escalate the complaint to stage 3 (a Governor Panel Hearing) setting out which aspects of the outcome they wish to appeal against.
- The request to escalate to stage 3 panel hearing must be made to the Governance Team, via governance@tedwraggtrust.co.uk **within 10 school term time days** from the date of the stage 2 outcome letter. Requests that fall outside of this timeline will only be considered where exceptional circumstances apply.
- A panel hearing consists of at least three panel members who were not directly involved in the matters detailed in the complaint. The majority of panel members will always be governors, with at least one panel member who is independent of the management and running of the school who may join remotely (this could be a governor from another school within the Trust). Where appropriate, Trust Directors and Trust Leaders are able to take part in panels but only where they have not previously been involved in the complaint and are not line managing that school.
- The panel will not consider any new complaints or any additional evidence to the initial complaint presented at Stage 2.

A complainant may bring someone along to the panel meeting to provide support. This can be a relative or friend. Generally, we do not encourage either party to bring legal representatives to the committee meeting as this is a reconciliation hearing and does not adopt a legalistic approach.

Representatives from the media are not permitted to attend.

Acknowledgement

The Governance Team will acknowledge receipt of the complaint within **3 school term days**

→

Panel Hearing

The Governance Team aim to convene the panel within **15 school term days** from the receipt of the appeal request

→

Outcome Panel

Decision to dismiss, uphold whole or in part to be advised by letter within **10 school term days**

If the panel cannot be held within the 15 school term days, the school will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Governance Team 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.

The school will only provide the papers included as part of the evidence considered in the stage 2 complaint.

The Governance Team will arrange the panel date, time, venue and panel membership.

Arranging the meeting confirmation of the date, time and venue at least **5 school term days** in advance → **Papers** to be submitted to the Governance Team at least **5 school term days** before the meeting → **Papers to be circulated** Written materials to be circulated to all parties at least **3 school term time days** before the meeting

The panel should not accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

CCTV or mobile videos cannot be submitted where other students are in view without their consent. There is no facility to edit the CCTV recordings.

The panel will consider the complaint and all evidence presented and can uphold the decision in whole or in part, or dismiss the complaint, in whole or in part. Where the complaint is upheld the panel will decide on the appropriate action to be taken to resolve the complaint. The panel's findings/recommendations will be presented in writing within 10 school days. The panel will ensure that those findings and recommendations are emailed 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 proprietor and the headteacher.

The outcome of any complaint will be set out under a possible three outcomes:

Uphold
All aspects of the complaint are upheld

Even where evidence now shows action has been taken to address the concerns raised

Uphold in part
Aspects of the complaint are upheld

Evidence presented by the school demonstrates that elements of the complaint are unfounded in part

Dismiss
The evidence presented found no evidence to uphold the complaint in full

Stage 3 represents the final stage of the Ted Wragg Trust's internal complaint procedures for responding to a complaint. The complaint is either resolved or closed at this stage.

If the complainant believes the school/Trust have not followed the process in handling their complaint in accordance with the published complaints procedure or acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the Department for Education (DfE) once the Stage 3 Governor Panel Hearing has completed.

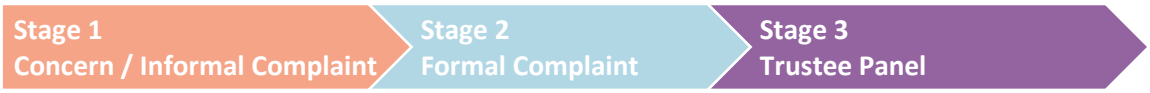
The DfE will not normally reinvestigate the substance of the complaints or overturn any decisions made by the Governor Panel Hearing. They will consider whether the Trust has adhered to education legislation and any statutory policies connected with the complaint and whether they have followed Part 7 of the Education (Independent School Standards) Regulations 2014.

The complainant can refer their complaint to the DfE using Enquiry Form

In writing at:-

Department for Education
Schools Complaints Compliance Unit
Piccadilly Gate
Store Street
Manchester
M1 2WD

Appendix 4: Complaints against the Trust



TRUST

If a complainant wishes to complain directly about the Trust, then the complaint should be addressed to the Trust Lead for Complaints & Compliance to be investigated at Complaints@tedwraggtrust.co.uk

The Trust will follow the procedures as set out in stages 1 and 2.

If a stage 3 panel is required this will consist of two trustees who have no prior knowledge or connection with the complaint and one independent panel member who may be from another trust.

The same timelines would apply to each of the stages in this complaint procedure.

Complaints about staff conduct will not generally be handled under this complaint procedure but considered under any staff disciplinary procedures as appropriate. Outcomes will not be shared with complainants.

CEO and DCEO

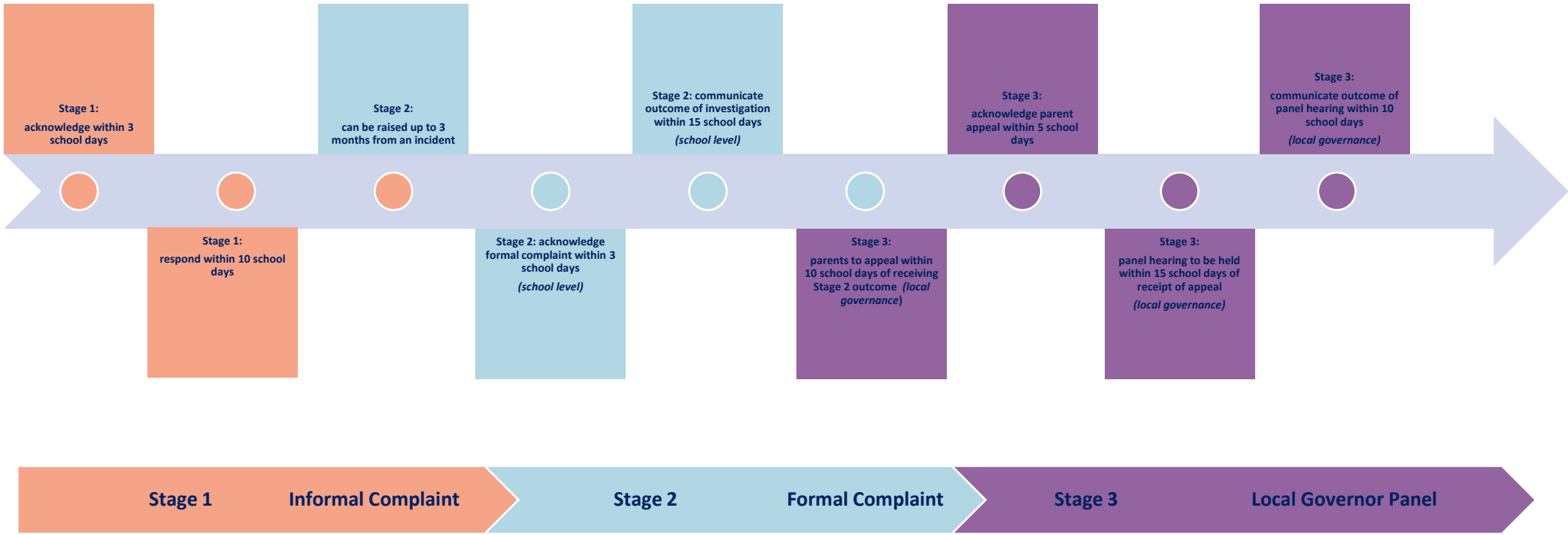
Where a complaint concerns the CEO or Deputy CEO, the complaint will be investigated by the Chair of Trustees, or the Vice Chair dependent on any prior involvement or knowledge of the complaint which would exempt them.

Trust Board, Chair of Trustees or a Trustee

Where a complaint is jointly about the Chair and Vice Chair or the entire Trust Board, the stage 3 panel will be heard by a completely independent committee panel.

Appendix 5: Complaints Process Timeline

There is an expectation that complaints would be resolved at school level and that mediation would take place to build trust in any breakdown in relationships between the complainant and the school. If the complaint escalates through the formal complaint stages set out in the Complaints Policy, the time span would range between 10 school days through to 80 school days.



Appendix 6: Scope of the complaints policy

Some complaints are dealt with under other statutory procedures and therefore not included in this policy (see below).

Admissions to schools

- Concerns about admissions should be handled through a separate process – either through the appeals process or via the local authority
- Each school has an Admissions Policy which notes the appeal process

Statutory Assessments for special educational needs

- Concerns about statutory assessments of special educational needs should be raised directly with local authorities.

Matters likely to require a Child Protection Investigation

- Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance.
- If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH).
- LADO CONTACT: 01392 384964 or childsc.localauthoritydesignatedofficersecuremailbox@devon.gov.uk
- MASH CONTACT Devon: 0345 155 1071 / mashsecure@devon.gov.uk
- MASH CONTACT Plymouth: 01752 668000/gateway@plymouth.gov.uk

Exclusion of children from school

- Further information about raising concerns about exclusion is outlined in the Dept. for Education's Suspension and Permanent Exclusion guidance
- The Ted Wragg Trust Exclusion Policy can be accessed here Exclusion Policy
- Complaints about the application of the behaviour policy can be made through this complaints procedure

Whistleblowing

- We have a whistleblowing procedure for all our employees, including temporary staff and contractors.
- Volunteer staff who have concerns about our school should complain through the school's complaints procedure in the first instance to resolve any issues before initiating the whistleblowing procedures.

Staff grievances

- Complaints from staff will be dealt with under the school's internal grievance procedures

Staff conduct

- Complaints about staff conduct will be dealt with under the HR policies, if appropriate.
- Any misconduct identified following an investigation will be addressed via internal disciplinary procedures.
- 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.

Complaints about services provided by other providers who may use school premises or facilities.

- Complainants should follow the external provider's own complaints procedure for those hiring 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, you should advise them to follow your complaints procedure.
- The right of withdrawal does not apply to other areas of the curriculum where religious matters may be spontaneously raised by pupils or arise in other subjects such as history or citizenship.

If other bodies are investigating aspects of the complaint, for example the Police, Local Authority safeguarding teams of tribunals, this may impact on our ability to adhere to the timescales within this procedure or result in the procedure being suspended until those public bodies have completed their investigations. If this happens, we will inform you of a proposed new timescale.

If a complainant commences legal action against the Ted Wragg Trust in relation to their complaint, we will consider whether to suspend the complaints procedure until those legal proceedings have concluded.