# COMPLAINTS POLICY

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| **Policy Owner:** | Chief Executive Officer (CEO) |
| **ISSR Reference:** | Part 7 – Manner in Which Complaints Are Handled |
| **Date of review:** | Summer 2026 |
| **Approved by:** | Group Board |
| **Date of next review** | Autumn 2026 |

**Version Control Information**

| Reason for Amendment | Role | Date | Main Changes |
|---|---|---|---|
| Tier 1 policy formatted into SDEG house style and running order | Chief Executive Officer (CEO) | Group Board – Summer 2026 | Streamlined format, monitoring wording and policy links aligned to house style |

## 1. Aims

St Dunstan's Education Group ("the Group") is committed to maintaining positive relationships with pupils, parents and carers and to providing high-quality education and childcare across all of its settings.

The Group aims to ensure that:

- concerns and complaints are dealt with fairly, consistently and promptly;
- concerns are resolved at the lowest appropriate level whenever possible;
- parents and carers understand how concerns may be raised and escalated;
- complaints are investigated objectively and proportionately;
- complaints are used constructively to improve the quality of education, care and service provided;
- parents and carers feel able to raise concerns without fear of disadvantage.

The Group recognises that concerns and complaints provide valuable feedback and opportunities for learning and continuous improvement.

### Scope

This policy applies to complaints made by:

- current parents and carers; and
- former parents and carers, provided the complaint was initially raised whilst the child remained on roll or registered within the relevant provision.

This policy applies to complaints relating to:

- educational provision;
- pastoral care and pupil welfare;
- communication;
- admissions and transitions processes;
- nursery and EYFS provision;
- the implementation of school or Group policies;
- the conduct of staff in the delivery of education or care.

This policy applies across:

- St Dunstan's College;
- St Dunstan's Junior School;
- Rosemead Preparatory School & Nursery;
- St Christopher's The Hall School;
- West Lodge School;
- any standalone nursery provision operated by the Group;
- any future educational or childcare provision operated by the Group.

This policy does not normally apply to:

- exclusions or required removals;
- safeguarding allegations against staff;
- whistleblowing concerns;
- staff grievances;
- subject access requests;
- complaints relating solely to commercial services delivered through the Group's trading subsidiary.

Complaints concerning commercial activities such as venue hire, lettings, events, holiday camps or other commercial services will normally be managed through the relevant customer service procedures.

Where a complaint concerns the welfare, supervision, education or care of a child participating in a service delivered through the Group's trading subsidiary, the Chief Executive Officer may determine that the matter should instead be considered under this policy.

For the purposes of this policy, a school day means a day on which the relevant educational or childcare provision to which the complaint relates is open and operating for the purpose of educating or caring for children.

School days do not include:

- weekends;
- bank holidays;
- public holidays;
- INSET or staff training days during which children are not attending;
- school holidays; or
- periods of planned closure of the relevant provision.

Where a complaint relates to nursery provision operating outside normal school term dates, a school day shall mean any day on which that nursery provision is open and operating for children.

**2. Legislation and Regulatory Framework**

This policy has regard to:

- The Education (Independent School Standards) Regulations 2014;
- Independent School Standards Regulations (ISSRs), particularly Part 7 – Manner in Which Complaints Are Handled;
- Education and Skills Act 2008;
- Data Protection Act 2018;
- UK General Data Protection Regulation (UK GDPR);
- The Early Years Foundation Stage (EYFS) Statutory Framework;
- Relevant guidance issued by the Independent Schools Inspectorate (ISI);
- Relevant requirements of Ofsted in relation to complaints handling.

This policy satisfies the requirements of ISSR Regulation 33 concerning the handling of complaints from parents and carers.

## 3. Roles and responsibilities

### 3.1 Group Board of Governors

The Group Board of Governors is responsible for:

- approving and reviewing this policy;
- monitoring complaint trends and themes;
- ensuring compliance with regulatory requirements;
- appointing members of Stage 3 Complaints Panels, including ensuring appropriate representation from both the Local School Board and the Group Board of Governors where relevant;
- receiving summaries of Stage 3 complaints, outcomes, trends and lessons learned.

### 3.2 Local School Boards

The Local School Board is responsible for:

- receiving appropriate reports on complaint themes, trends and outcomes relating to its school;
- supporting local accountability and assurance regarding the handling of complaints;
- contributing members to Stage 3 Complaints Panels where appropriate;
- considering lessons learned arising from complaints and supporting continuous improvement within the school;
- providing an informed local perspective to complaints governance whilst maintaining appropriate independence from the complaint itself.

### 3.3 Chief Executive Officer

The Chief Executive Officer is responsible for:

- overseeing the implementation of this policy;
- investigating Stage 2 complaints;
- identifying significant complaint trends and themes;
- reporting annually to Governors on complaints and outcomes.

### 3.4 Heads of School and Group Head of Nurseries

The Heads of School and Group Head of Nurseries are responsible for:

- overseeing Stage 1 complaints;
- undertaking or commissioning investigations;
- issuing written Stage 1 outcomes;
- identifying lessons learned;

- ensuring appropriate records are maintained.

### 3.5 Staff

All staff are responsible for:

- responding appropriately to concerns;
- seeking early resolution where possible;
- escalating concerns in accordance with this policy.

### 3.6 Parents and Carers

Parents and carers are expected to:

- raise concerns promptly;
- engage respectfully throughout the process;
- provide accurate and relevant information;
- cooperate with reasonable requests for clarification.

## 4. Complaints management system

### 4.1 General Principles

The Group encourages concerns to be raised as soon as possible following the events giving rise to them.

Complaints should normally be submitted within three months of the relevant incident unless exceptional circumstances exist.

Complaints received during weekends or holiday periods may not be investigated until the relevant school or setting reopens.

Anonymous complaints will not normally be investigated under this policy. However, the Chief Executive Officer may determine that an anonymous complaint should be investigated where there are safeguarding, welfare, regulatory or other exceptional reasons for doing so.

Where additional investigation is necessary, or where circumstances outside the Group's control affect progress, the timescales set out within this policy may be extended. Where this occurs, the complainant will be informed of the revised timescale and the reasons for the delay

All complaints will be handled seriously, fairly and confidentially, subject to legal, safeguarding and regulatory obligations. Correspondence, statements and records relating to individual complaints will remain confidential except where disclosure is required by law or requested by the Secretary of State or an inspection body.

The timescales contained within this policy are expressed in school days. Where a complaint is received during a period when the relevant school, nursery or educational provision is closed,

the complaint will normally be acknowledged upon reopening and timescales under this policy will commence from the next school day.

**4.2 Stage 1 – Concern Resolution**

The vast majority of concerns should be capable of resolution through Stage 1.

Parents and carers should initially raise concerns with the most appropriate member of staff.

Where concerns remain unresolved, they should be escalated through the leadership structure of the relevant school or nursery provision.

Stage 1 is not concluded until the complaint has been reviewed by the Head of School (or the Group Head of Nurseries where the complaint relates to nursery or EYFS provision) and a written outcome has been issued.

For the avoidance of doubt, discussions with:

- teachers;
- tutors;
- nursery practitioners;
- middle leaders;
- Heads of Year;
- Assistant Heads;
- Deputy Heads; or
- other members of staff

do not in themselves constitute completion of Stage 1.

A complaint may only progress to Stage 2 once the Head of School (or Group Head of Nurseries) has had the opportunity to investigate the matter and provide a written outcome.

Complaints submitted directly to Stage 2 which have not completed Stage 1 will normally be referred back to the Head of School or Group Head of Nurseries for consideration.

The Head of School or Group Head of Nurseries will normally:

- acknowledge the matter within five school days;
- arrange any necessary meeting or discussion;
- undertake any investigation considered appropriate; and
- provide a written outcome normally within five school days of concluding the investigation.

**4.3 Stage 2 – Formal Complaint**

Where a complainant remains dissatisfied following completion of Stage 1, a formal complaint may be submitted to the Chief Executive Officer.

**Complaints Concerning Senior Leaders or Governors**

Where a complaint concerns:

- the Chief Executive Officer, Stage 2 will be conducted by the Chair of the Group Board of Governors or their nominee;
- the Chair of the Group Board of Governors, Stage 2 will be conducted by the Vice-Chair of the Group Board of Governors or another appropriately appointed Governor;
- a Governor, the Chair of the Group Board of Governors shall determine the most appropriate person to investigate the complaint.

Any person appointed under this section must not have had prior involvement in the matters complained of.

**Submission Requirements**

Formal complaints should normally be submitted using the Group Formal Complaint Form.

The complaint should include:

- a concise summary of the complaint;
- relevant background information;
- reasons why the complainant remains dissatisfied with the Stage 1 outcome;
- supporting evidence;
- the outcome sought.

The Group reserves the right to request that a complaint is resubmitted in a more concise format where a submission is excessively lengthy, repetitive, unfocused, abusive or otherwise impedes a fair and proportionate investigation.

Supporting documentation may be submitted as appendices.

The Chief Executive Officer will normally acknowledge receipt within three school days.

The Chief Executive Officer may:

- review relevant records;
- interview staff;
- seek additional evidence;
- meet with the complainant;
- commission further investigation where appropriate.

The Chief Executive Officer will normally issue a written outcome within fifteen school days of receipt of the complaint.

The Stage 2 outcome will include:

- a summary of the complaint;

- details of the investigation undertaken;
- findings;
- reasons for the decision;
- recommendations, where appropriate;
- actions identified as a result of the complaint.

**4.4 Data Protection Complaints**

Complaints relating primarily to the processing or handling of personal data will be managed under this policy and with reference to the Group's Data Protection Policy.

The Group will:

- acknowledge receipt of such complaints within 30 calendar days;
- investigate complaints without undue delay; and
- communicate the outcome promptly following completion of the investigation.

Nothing within this procedure prevents a complainant from exercising their statutory rights or raising concerns directly with the Information Commissioner's Office.

**4.5 Stage 3 – Complaints Panel**

Where a complainant remains dissatisfied following Stage 2, they may request consideration by a Complaints Panel.

Requests must be submitted in writing to the Director of Governance and Compliance within fifteen school days of receipt of the Stage 2 outcome.

**Panel Composition**

The Complaints Panel will comprise at least three individuals who have had no prior involvement in the matters complained of.

The Panel will normally consist of:

- at least one member of the relevant Local School Board;
- at least one member of the Group Board of Governors;
- at least one individual who is independent of the management and running of the Group.

Additional members may be appointed where appropriate.

The Group Board of Governors shall ensure that at least one Group Governor is represented on every Stage 3 Complaints Panel.

Panel members must have had no material involvement in the matters complained of and must be able to act independently and impartially.

Parents and carers may attend the hearing and may be accompanied by one other person. Legal representation will not normally be appropriate.

The Panel may:

- uphold the complaint in whole or in part;
- dismiss the complaint in whole or in part;
- make recommendations;
- identify actions for further consideration by the Group.

The Panel's findings and recommendations will normally be issued within ten school days of the hearing.

Copies of the findings and recommendations will be provided to:

- the complainant;
- where relevant, the person complained about;
- the Head of School or Group Head of Nurseries;
- the Chief Executive Officer;
- the Chair of the relevant Local School Board; and
- the Chair of the Group Board of Governors.

The findings and recommendations may also be shared with members of the relevant Local School Board and Group Board where necessary for governance, assurance, regulatory or learning purposes, subject to appropriate confidentiality requirements.

The decision of the Panel is final.

**4.6 Unreasonable, Persistent or Vexatious Complaints**

The Group is committed to dealing fairly and impartially with all complaints.

However, where complainant behaviour becomes unreasonable, abusive, repetitive, vexatious or disproportionate, the Group reserves the right to:

- limit correspondence;
- designate a single point of contact;
- decline to revisit matters that have already been investigated fully;
- bring the complaints procedure to a close.

Any such decision will be made by the Chief Executive Officer or Chair of Governors and communicated in writing.

**4.7 Complaint Outcomes and Learning**

The Group views complaints as an important source of organisational learning.

Following the conclusion of Stage 2 or Stage 3 complaints, consideration will be given to:

- lessons learned;
- staff training requirements;
- policy amendments;
- procedural improvements;
- communication improvements.

Actions arising from complaints will be recorded and monitored.

Subject to confidentiality obligations and employment considerations, feedback will be provided, where appropriate, to:

- the complainant; and
- the person complained about.

**4.8 EYFS Complaints**

Written complaints relating to the fulfilment of EYFS requirements will be investigated and the complainant notified of the outcome within 28 school days.

Parents and carers who remain dissatisfied with the outcome of a complaint relating to EYFS provision may contact Ofsted.

Information about how to contact Ofsted is available on the relevant school or nursery website.

**4.9 Record of Formal Complaints**

The Group maintains a written record of all complaints progressing to Stage 2 or Stage 3.

The record will include:

- the complaint;
- the outcome;
- whether the complaint was resolved through Stage 2 or proceeded to a Panel Hearing;
- actions taken as a result of the complaint, regardless of whether the complaint was upheld;
- lessons learned and recommendations arising from the complaint.

In accordance with regulatory requirements, the Group publishes the number of formal complaints received during the preceding academic year.

| Provision | Number of Formal Complaints |
|---|---|
| St Dunstan's College | 1 |
| St Dunstan's Junior School | 0 |

| | |
|---|---|
| Rosemead Preparatory School & Nursery | 1 |
| St Christopher's The Hall School | 0 |
| West Lodge School | 0 |
| Group Nursery Provision | N/A |

Reporting Period: Academic Year 2025–2026

Complaint records, correspondence and investigation materials will normally be retained for a minimum period of seven years following closure of the complaint, or longer where required by law, regulation, safeguarding requirements or ongoing litigation

**5. Monitoring**

This policy will be reviewed annually by the Chief Executive Officer or sooner where required due to:

- legislative change;
- regulatory change;
- inspection findings;
- organisational change.

An annual report summarising complaints, trends, outcomes and lessons learned will be presented to the Group Board of Governors.

At every review, the policy will be approved by the Group Board of Governors.

**6. Links with other policies**

This policy should be read alongside:

- Safeguarding and Child Protection Policy;
- Behaviour Policy;
- Anti-Bullying Policy;
- Exclusions and Required Removal Policy;
- Data Protection Policy;
- Privacy Notice;
- SEND Policy;
- Speaking Up (Whistleblowing) Policy;
- EYFS Policies;
- Staff Grievance Procedure.

**Appendix A**

**St Dunstan's Education Group**

**Stage 2 Formal Complaint Submission Form**

Please complete and return to the Chief Executive Officer's office who will acknowledge receipt and explain what action will be taken

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|---|---|
| **Parent / Carer Details** | |
| **Name:** | |
| **Relationship to child:** | |
| **Child's name:** | |
| **School / Nursery:** | |
| **Email address:** | |
| **Telephone number:** | |
| **Date:** | |
| **Completion of Stage 1** | |
| Head of School / Group Head of Nurseries | |
| Date of written Stage 1 outcome | |
| **Section 3 – Summary of Complaint** | |
| Please provide a concise summary of your complaint (**maximum 750 words**): | |

| **Section 4 – Why Do You Remain Dissatisfied?** | |
|---|---|
| Please explain why you remain dissatisfied following the Stage 1 outcome **(maximum 500 words)**: | |
| **Section 5 – Outcome Sought** | |
| Please explain the outcome or resolution you are seeking **(maximum 300 words)**: | |
| **Section 6 – Supporting Evidence** | |
| Please list any supporting documents attached to this complaint. | |
| **Declaration**<br><br>**I confirm that:**<br><br>☐ Stage 1 of the Complaints Policy has been completed<br><br>☐ The information provided is accurate to the best of my knowledge<br><br>☐ I understand that the Group may request clarification or additional information where necessary. | |
| **Signed** | |
| **Date** | |