



March 2026
**COMPLAINTS
 POLICY**

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TCAT Lead	DG

Document Control

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1	14/12/2023	Policy approved by Trust Board
2	27/03/2025	Amended to include section 3 Roles and responsibilities, 5.5 Duty of Care and added in Dallam Community Primary School, the Sutton Academy and South Wirral High School in Appendix 2.
3	19/03/2026	Policy reviewed to align with new DfE guidance (2026), NGA guidance and for reader clarity.
4.	26/03/2026	Policy approved by Trust Board.

This policy is a Trust-wide policy and applies without exception to all staff, students, trustees and governors who attend or work at all academies in the Trust or in the central Trust structure.

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1. Introduction

The purpose of this policy is to provide a clear, fair and transparent process for resolving complaints or concerns about The Challenge Academy Trust (the "Trust"), any Academy within the Trust, or any individual connected with the Trust. The Trust takes complaints seriously and regards them as an opportunity to learn, reflect and improve. Throughout the complaints process, resolution remains the core objective.

The procedures outlined in this policy are not a legal process and therefore complainants should not seek legal advice or representation.

- A **concern** is defined as "an expression of worry or doubt over an issue considered to be important for which reassurances are sought." The academy will resolve concerns through day-to-day communication as far as possible.
- A **complaint** is defined as "an expression of dissatisfaction about actions taken or a lack of action."

Please note that:

- **School days** in this policy refers to days when an academy is open to pupils for teaching and does not include INSET days.
- References to 'parents' in this policy include carers
- Where the complaints process has been started (but not completed) whilst parents/carers have children at the Academy, but the children have since left, the procedure for current parents will continue to be used.
- An independent investigator is an individual with no prior knowledge of the complaint.

Anyone can make a complaint, but a different process applies depending on whether the person raising the complaint is a parent /carer of a current pupil at an Academy within the Trust. Please refer to page 10 '**Complaints Procedure for parents / carers of current pupils**' if you are a parent of a current pupil, otherwise please see 'Complaints raised by those who are not parents / carers of current pupils' on page 19.

Please note that complaints about matters where an alternative complaints / appeal process exists will not be generally dealt with under this policy. These are set out below on page 7 '**Complaints that will not be considered under this policy**'

Requests for reasonable adjustments to the process set out below will be considered to ensure that complainants can access and complete the process.

In line with DfE requirements, the Trust will ensure that its complaints procedure is in writing, available on request to parents and carers, and published on each academy's website. The procedure sets out clear timelines and the stages for managing complaints.

The Academies/Trust recognises that raising a concern or complaint can be an anxious and emotionally challenging experience for parents and carers. In line with national guidance, we will respond with empathy, clarity and emotional intelligence, acknowledging the importance of the issue for the family while ensuring that all parties are treated fairly and respectfully.

1.1 What the Complaints Procedure Can and Cannot Do

To support clarity and avoid escalation, the Trust wishes to be transparent about the purpose and limits of this complaints procedure.

This procedure *can*:

- Review whether the academy or Trust followed the correct processes and acted reasonably.
- Consider whether communication has been clear, timely and appropriate.
- Ensure concerns have been listened to and responded to respectfully.
- Identify improvements to practice, systems or communication.
- Provide explanations, apologies where appropriate, and reassurance about future actions.

This procedure *cannot*:

- Re-investigate matters that have already been properly considered.
- Make or overturn staffing, HR, capability or disciplinary decisions.
- Intervene in matters governed by other statutory processes (e.g., SEND Tribunal, admissions, exclusions, safeguarding referrals).
- Direct financial compensation or impose punitive outcomes.
- Disclose personal information about staff, pupils or third parties.

The complaints process is intended to resolve issues at the **earliest possible stage**, and escalation should occur only where informal resolution has not been successful.

Complaints Process Overview To improve clarity, the following summarises the complaints process for parents / carers.:

- **Stage 1:** Informal resolution with academy staff (within 15 school days).
- **Stage 2:** Formal written complaint to Principal/Headteacher (acknowledged within 5 school days, investigated within 25 school days).
- **Stage 3:** Complaints Panel hearing (acknowledged within 5 school days, meeting within 15 school days after academy response).
- **Final escalation:** Department for Education.

[Please note a separate process applies for complaints about the fulfilments of EYFS requirements, and to complaints raised by those who are not parents /carers of those at the school].

When does a concern become a complaint?

A concern becomes a formal complaint when:

- The issue remains unresolved after informal attempts.
- The complainant requests formal investigation.
- The matter involves serious allegations (e.g., safeguarding, discrimination).

Examples:

- Concern: "Homework not marked on time."
- Complaint: "Repeated failure to provide feedback despite raising the issue."

1.2 Overview of the Complaints Process

To support families in understanding how to raise concerns constructively, the Trust has adopted the following parent-friendly summary, which aligns with the national five-step model published in early 2026:

Step 1 – Identify the issue: Consider whether the matter is feedback, a concern, or a formal complaint.

Step 2 – Speak to the appropriate person: Where possible, raise the issue with the staff member closest to the situation.

Step 3 – Seek early resolution: Engage in constructive dialogue aimed at resolving concerns promptly and informally.

Step 4 – Submit a formal complaint (where informal routes have not resolved the issue): This triggers Stage 2 of the Trust's formal procedure.

Step 5 – Escalate to the Complaints Panel (Stage 3) if you remain dissatisfied with the formal response.

2. Complaints that will not be considered under this policy

Usually, complaints relating to the matters set out in the table below will not be considered under this policy as they have their own appeal or complaint processes. Where necessary the Trust will exercise its discretion.

Note that where complaints relate to staff conduct, these may be dealt with under both this Complaints Policy and the Staff Grievance & Disciplinary Policy. In such circumstances complainants will not be informed of the outcome of any Staff disciplinary investigation or processes.

Matter	Route for raising concern / complaining
Admissions	Admissions Appeal – see Admissions Policy and Statutory Admissions Appeal Code, or complaint to DfE
Exclusions	Statutory review process – see Academy Exclusions Policy
Statutory SEN assessments	SEND Tribunal (and see SEN Code of Practice)
Safeguarding matters where it involves an allegation against a member of staff	Raise with Designated Safeguarding Lead or a direct referral can be made to the Local Authority Designated Officer at Warrington Borough Council - see Child Protection / Safeguarding Policy
Data protection / FOI	Raise with the Trust Data Protection Officer (DPO) in the first instance. If the matter cannot be resolved or you remain dissatisfied, you may refer your concern to the Information Commissioner’s Office (ICO). Information Commissioner's Office (ICO)
Staff Grievances and Disciplinary matters¹	Staff Grievance & Disciplinary Policy
Whistleblowing	Whistleblowing Policy
Third party contractors / suppliers	Provider concerned

3. Roles and Responsibilities

3.1 The complainant

The complainant will get a more effective and timely response to their complaint if they:

- Follow this policy
- Co-operate with the school or trust throughout the process, and respond to deadlines and communication promptly
- Ask for assistance as needed
- Treat all those involved with respect
- Do not approach individual governors about the complaint
- Do not publish details about the complaint on social media
- Avoid using complaint text generated by Artificial Intelligence ('AI') unless it has been personally reviewed and checked for accuracy. AI tools can produce incorrect legal information or overly complex submissions, which may delay or complicate the investigation process in a way that is not conducive to resolving the issue in a human way.

3.2 The investigator

An individual will be appointed to investigate the complaint and establish the facts. They will:

- Interview all relevant parties, keeping notes

- Consider records and any written evidence and keep these securely
- Prepare an impartial comprehensive report to the Principal/ Headteacher or complaints committee, which includes the facts and potential solutions

3.3 The complaints co-ordinator

The complaints co-ordinator can be:

- The Principal/ Headteacher or Principal/ CEO/ Operations Director
- Any other staff member providing administrative support

The complaints co-ordinator will:

- Keep the complainant up to date at each stage in the procedure
- Make sure the process runs smoothly by liaising with staff members, the Principal/ Headteacher, chair of governors/trustees, clerk and CEO and chair of trustees
- Be aware of issues relating to:
 - Sharing third-party information
 - Additional support needed by complainants; for example, interpretation support or where the complainant is a child or young person
- Keep records

3.4 Communication Standards

Communication during the complaints process will be guided not only by accuracy and clarity but also by a commitment to strengthening trust and mutual respect between families and the Academy/Trust. We aim to communicate in a way that is calm, proportionate, and relationship-focused, supporting positive partnership working and preventing unnecessary escalation.

All acknowledgments and responses will be in writing and include:

- Summary of the complaint.
- Actions taken so far.
- Next steps and expected timelines.

Updates will be provided via email unless the complainant requests an alternative method.

3.5 Clerk to the Local Governing Challenge Board and Trust Board

The clerk will:

- Be the contact point for the complainant and the complaints panel if required, including circulating the relevant papers and evidence before complaints committee meetings
- Arrange the complaints hearing
- Record and circulate the minutes and outcome of the meeting.

3.6 The Committee Chair

The committee chair will:

- Chair the meeting, ensuring that everyone is treated with respect throughout
- Make sure all parties see the relevant information, understand the purpose of the committee, and are allowed to present their case

3.7 How Complaints Are Assessed

When reviewing concerns or formal complaints, staff will consider:

- Whether the issue is within the remit of this policy

- Whether the desired outcome is achievable
- Whether evidence supports the concerns raised
- Whether the academy or Trust followed appropriate procedures
- Whether further clarification is needed before progressing
- Whether early, informal resolution remains possible

This ensures a fair and consistent approach and helps prevent unnecessary escalation.

3.8 Recording of Meetings and Conversations

To ensure a safe, respectful and consistent approach across all academies within the Trust, the following applies to all meetings and conversations held as part of the complaints process, including informal, formal, and Stage 3 discussions:

- Recording (audio or video) of any meeting, conversation or discussion is not permitted unless it is required as a reasonable adjustment for a disability or special need.
- Where a recording is requested as a reasonable adjustment, this must be discussed in advance, and informed consent must be obtained from all parties before any recording takes place.
- Consent will be formally documented in writing or within the meeting notes.
- Covert recordings are strictly prohibited. Recordings made without the knowledge and informed consent of all participants will not be accepted as evidence at any stage of the complaints process.
- The Trust may terminate a meeting if an attempt is made to record without consent.
- Written summaries or follow-up emails will be provided where appropriate to ensure clarity and accessibility for all parties.

4. Complaints about fulfilment of early years requirements

In order to comply with the statutory framework, written concerns or complaints relating to the fulfilment of the EYFS Requirements will be dealt with in accordance with the following process:

- a) The written concern/complaint will be acknowledged within **5 school days**
- b) The academy Headteacher/Principal will commission an investigation into the concern or complaint which may include meeting with the Complainant and the Head of Early Years.
- c) A written response notifying the Complainant of the outcome of the investigation will be sent within **28 school days** of the complaint being received.
- d) Where the Complainant remains dissatisfied, the Clerk to the Local Governing Challenge Board will ensure that a formal Complaints Panel will be convened in accordance with **Stage 3** of this policy.

Parents who have concerns should raise them through the complaints process. Where they are not satisfied having exhausted the Complaints Process, parents are further advised that where they have concerns regarding the academy meeting EYFS requirements they may contact Ofsted.

A record of the written complaints and their outcome will be maintained and made available to Ofsted on request.

5. Complaints Procedure for parents / carers of current pupils

5.1 Complaint Process

Stage 1 - Informal Resolution

Any matter of concern or complaint should be raised, and attempted to be resolved, on an informal basis. Generally, it is expected that where the matter relates to a pupil it will have been raised with relevant staff in the academy before a request is made to deal with it under the formal stages of this policy.

The concern or complaint should be raised with the academy or Trust within **3 months** of the incident or, where a series of associated incidents have occurred, within **3 months** of the last of these incidents. Complaints made outside of this time frame may not be considered unless exceptional circumstances apply.

The academy or Trust will seek to resolve matters at the informal stage within **15 school days** of the issue being raised by the parent.

Where the matter is not resolved at the informal stage, it may be elevated to the formal stage as set out below.

Focus on Early Resolution

The Trust is committed to resolving concerns at the lowest possible level. At Stage 1, staff will work with complainants to clarify the issue, identify what outcome the complainant is seeking, and explore whether the matter can be resolved promptly through discussion, explanation or agreed actions. Many concerns can be resolved swiftly without requiring formal escalation. Where a concern cannot be resolved at Stage 1, the complainant will be supported to understand what information is required for a Stage 2 complaint and what the process can realistically achieve.

Progressing through the stages

Complainants are expected to follow each stage of the complaint's procedure in order. If a complaint is submitted at a later stage without completing earlier stages, the Trust may refer the complaint back to the appropriate stage unless there are exceptional circumstances.

Submission of Formal Complaints

Should a complainant wish to raise a formal complaint only after it has been raised informally, completion of appendix 1 (Complaints Form) would need to be submitted to clearly identify the grounds of the complaint and outcomes sought.

Reasonable and Realistic Outcomes

The Trust will consider the outcome requested by the complainant; however, outcomes must be reasonable, proportionate and within the remit of the complaints process. Where an outcome is requested that the Trust cannot lawfully provide (e.g., disciplinary sanctions on staff, punitive measures, access to pupil or staff personal data, financial compensation), this will be explained, and alternative appropriate remedies may be offered.

When stating the outcome sought, complainants should describe what they would like to happen as a result of the complaint (for example, an explanation, an apology, or changes to a process).

The Trust cannot guarantee that the specific outcome requested will be agreed, but clearly stating the desired outcome helps to focus the investigation and response.

Where concerns relate to pupils with additional needs, including SEND, the Academy/Trust acknowledges that parents and carers may experience heightened anxiety. Staff will take additional care to ensure communication is clear, patient and supportive, and that families understand the steps being taken to address their concerns.

Stage 2 - Formal Resolution: Investigation by a Nominated Individual

Stage 2 complaints must be set out in writing, ideally using the form available at Appendix 1, within **10 school days** of the Stage 1 response. It must be addressed to the Principal/Headteacher of the Academy (unless the complaint relates to the Principal/Headteacher in which case please refer to section headed '**Complaints against specific role-holders**' below). The complaint should set out briefly the grounds of the complaint, stating what it is that the parent considers should have been done or where the Academy or Trust has not met reasonable expectations and confirming the outcome sought.

The Chair of the Local Governing Challenge Board/ Principal/ Headteacher as appropriate will nominate an individual as complaints coordinator who will keep the complainant up to date at each stage in the procedure and make sure the process runs smoothly by liaising with staff members, the headteacher, chair of governors/trustees, clerk and CEO and chair of trustees as relevant.

The complaints coordinator will acknowledge the complaint within **5 school days**.

An investigation will be carried out by a nominated individual (the investigator) identified by the Chair of the Local Governing Challenge Board/ Principal/ Headteacher as appropriate, who may offer the parent a meeting. The investigator will speak to others involved. Whenever reasonably possible, any meeting with the parent will take place within **15 school days** of the written complaint being received.

The investigator will put her/his findings in writing and will indicate what, if any, steps should be taken to resolve the matter. Whenever reasonably possible, this will be done within **15 school days** of any meeting with the parent; if no meeting is arranged it will be within **25 school days** of the written complaint being received.

Where the parent remains dissatisfied, he or she may request the complaint is escalated to Stage 3.

Submission of Additional Evidence

The Academy/Trust will only consider evidence that is relevant to the complaint and that has been submitted in accordance with the requirements of the Stage 2 investigation process.

Where a complainant submits additional information or documentation at Stage 2 which has not been requested by the investigator, the Academy/Trust reserves the right not to accept or review this material. Where these submissions are of significant volume or relating to issues outside the scope of the original complaint, this may delay or hinder the investigation and will therefore not normally be considered. Where this occurs, and at the request of the Investigating Officer, the complainant may be provided with the opportunity to submit a revised, concise version.

Stage 3 - Formal Resolution: Complaints Panel Meeting

Stage 3 complaints must be set out in writing, using the form available at Appendix 1, stating where the parent remains dissatisfied and the outcome sought, and lodged with the Trust Compliance and Information Manager within **10 school days** of the Stage 2 response. The Compliance and Information Manager will acknowledge the Stage 3 complaint within **5 school days** and will inform the Clerk to the Trustees who will convene a Complaints Panel.

The Complaints panel will be appointed by or on behalf of the Trust and must consist of at least 3 people who were not directly involved in the matters detailed in the complaint. At least 1 panel member must be independent of the management and running of the academy.

The panel cannot be made up solely of governing board members, as they are not independent of the management and running of the academy. The independent panel member may however be a member of a Local Governing Body from another academy within the Trust if they have no conflict, no prior knowledge of the complaint and no apparent bias.

The Complaints Panel may include, but is not limited to, one or more persons from the following categories:

- (i) a member of the Local Governing Challenge Board of the Academy where the complaint emanated from;
- (ii) a member of a Local Governing Body from another Academy within the Trust;
- (iii) a member of the Board of Trustees from the Trust; and/or
- (iv) a member of a Local Governing Challenge Board or Trustee of another Academy Trust.

None of the members of the Complaints Panel will have been directly involved in the matters detailed in the complaint.

The Clerk will invite the Academy to put in writing its response to the Stage 3 complaint within **15 school days** of receiving the request. Whether or not the Academy has responded, the Clerk will convene a meeting of the Complaints Panel. That meeting will be held as quickly as practicable given the need to find a date that is reasonably convenient for the parent, the Academy and the members of the Complaints Panel. Whenever possible, the meeting will be held within **15 school days** of the end of the Academy's response time. The meeting date, time and location will be confirmed to all parties at least **10 school days** in advance.

The complainant may be accompanied at the panel hearing by another person of their choice. This may be a friend, relative, or supporter. The Trust will not normally allow legal representation unless there are exceptional circumstances.

The meeting is not a court case; it will be held in private and will be as informal as circumstances allow.

The parent will have the opportunity to put forward her/his reasons for dissatisfaction and to expand upon on them but may not introduce reasons that were not previously put in writing. The Complaints Panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded. The parent and the Academy/Trust will have the opportunity to put forward their respective version and views of events and each side, and the Complaints Panel members will be able to ask questions. The parent will have the opportunity to make final comments to the Complaints Panel.

Submission of Additional Evidence

At Stage 3, the Complaints Panel will only consider evidence that has been submitted by the deadline set by the Clerk.

The Complaints Panel will not consider new issues that have not previously been raised in writing at Stage 2, nor will it review extensive new evidence that could reasonably have been provided earlier in the process.

Material submitted at Stage 3 which includes new allegations, new lines of complaint, or large volumes of supplementary evidence will not normally be accepted or reviewed.

Where submissions are received after the deadline, these may be accepted if there are exceptional circumstances. In all other circumstances where submissions are received after the deadline, or where they fall outside the scope of the complaint previously considered at Stage 2, the Clerk will notify the complainant that such material cannot be included in the evidence pack and will be disregarded by the Panel.

The investigation and Panel review will proceed based solely on the admissible evidence submitted within the specified timeframe.

The evidence pack will be shared with the complainant, Complaints Panel members and relevant academy representatives on the same day.

The Complaints Panel aim to reach conclusions and make recommendations and a copy of those conclusions and recommendations will be:

- a) sent by electronic mail or otherwise provided in writing to the parent and, where relevant, the Academy or person complained about; and
- b) available for inspection on the Academy premises by the Trust, the Headteacher / Principal and the Chief Executive Officer.

The Complaints Panel will formulate its response as quickly as reasonably possible, aiming to do so within **10 school days**, and the Clerk will notify all concerned.

Where a parent declines or fails to attend the Formal Resolution Complaints Panel meeting and does not provide a compelling reason for non-attendance, the Panel will proceed in their absence. The Panel's decision will conclude the Trust's complaints procedure. Any attempt to re-open or continue the complaint following this decision will be considered in accordance with the *Serial or Persistent Complaints* provisions of the policy.

What the Complaints Panel can and cannot do

The Complaints Panel can:

- consider whether the complaints procedure has been properly followed;
- review the evidence and findings presented;
- reach conclusions on whether the complaint is **upheld, partially upheld** or **not upheld**;
- make recommendations where appropriate to improve practice or processes.

The Complaints Panel cannot:

- investigate new complaints or issues not previously raised in writing;
- overturn disciplinary decisions or impose disciplinary sanctions on staff;
- make financial payments or award compensation.

The focus of the Complaints Panel is to determine whether the complaint has been handled appropriately and whether reasonable steps have been taken to address the escalated concerns raised.

Once the complaints process is concluded (or a complaint has been terminated due to undue delay or failure to lodge a request for a Stage 3 Complaints Panel Meeting within the time stated in the policy) the matter is closed.

Missed Deadlines

If the Trust or Academy cannot meet the stated timelines, the complainant will:

- Receive written notification explaining the delay.
- Be given a revised timeline.

If the Complainant is still not satisfied, they may contact the Department for Education (DfE). There is an online procedure at:

[https://form.education.gov.uk/service/Contact the Department for Education](https://form.education.gov.uk/service/Contact_the_Department_for_Education)

the Complainant may write to the DfE at:

The School Complaints Unit (SCU)
Department for Education
2nd Floor, Piccadilly Gate
Manchester M1 2WD

5.2 Requests for further information

A complaint may not progress to the next stage where:

- The matter has already been fully addressed under this procedure and will be considered under the 'serial or persistent complaint' section of this policy.

Where further information or clarification is requested from the complainant at any stage, the complainant must provide the requested information within **5 school days** of the request being made.

If the information is not received within this timeframe, and no reasonable explanation or request for an extension has been submitted, the Trust may determine that the complaint cannot progress further.

In such cases, the complainant will be notified in writing that the complaint will be paused due to insufficient information to continue the process.

5.3 Complaints against specific role-holders

Complaints against the Principal/Headteacher

Any complaint relating to the Principal/Headteacher of the Academy must be raised in the first instance with the Trust's Chief Executive Officer who will aim to resolve the matter through dialogue. If resolution cannot be reached, the Chief Executive Officer will designate an

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independent Investigator who may be a senior member of the Trust, a member of a Local Governing Challenge Board or the Trust Board or an external individual if required to investigate the complaint as per **Stage 2 – Formal Resolution** process.

Complaints against the Local Governing Challenge Board

Where a complaint is brought against a member of the Local Governing Body, it should be raised with the Chair of the Local Governing Body who will investigate the complaint (or appoint another member of the Local Governing Body to do so) as per **Stage 2 – Formal Resolution** process.

If the complaint is against the Chair of the Local Governing Challenge Board, then the Vice Chair of the Local Governing Challenge Board will investigate the complaint (or appoint another member of the Local Governing Body to do so) in the same way as per **Stage 2 – Formal Resolution** process.

In exceptional circumstances the Chair of Trustees may at his or her absolute discretion determine that a complaint against a member of the Local Governing Challenge Board should be dealt with at Trust Board level and, if so determined, the Chair of Trustees will oversee Stage 2.

Complaints against individual Trustees / the Board of Trustees

If the complaint is against a Trustee, then it should be raised with the Chair of Trustees by writing to the Clerk to the Board of Trustees. In the case of a complaint against the either Chair or the Board of Trustees as a whole, then it should be put in writing to the Clerk to the Board of Trustees who will refer it to the Members.

In such cases the Chair of Trustees / the Members will investigate the complaint or appoint an appropriate person to do so in the same way as per **Stage 2 – Formal Resolution** process.

Where the complaint moves to **Stage 3**, the Chair of Trustees/the Members (as applicable) will determine how the Complaint Panel is to be constituted but will ensure that at least one person is independent of the management and running of the Academy.

Complaints against the Chief Executive Officer or other Trust office staff

If the complaint is against a member of Trust staff, then it should be raised with the Chief Executive Officer, (or in the case of a complaint against the Chief Executive Officer, the Chair of Trustees) who will investigate the complaint (or appoint another member of the Board of Trustees to do so) in the same way as per **Stage 2 – Formal Resolution** process.

5.4 Complaints received outside of term time

The Academy/Trust (as appropriate) will consider complaints made outside of term time to have been received on the first school day after the holiday period.

5.5 Withdrawal of a Complaint

If a Complainant wants to withdraw their complaint, they will be asked to confirm the withdrawal in writing.

5.6 Duty of Care

The Trust takes its duty of care to all staff and stakeholders very seriously and will endeavour to provide any support necessary to those involved in the complaints process. This commitment is

reflected in our approach to handling complaints, ensuring fairness, confidentiality, and support throughout the procedure.

5.7 Practical Support

The Trust will endeavour to provide reasonable adjustments, including, but not limited to:

- Interpreter or translation services.
- Accessibility support for disabilities.
- Advocacy or representation for vulnerable complainants.

Requests for support can be made to the Trust Clerk at any stage.

6.0 Record keeping and confidentiality

A written record will be kept of all complaints that reach the formal stage, whether they are resolved following Stage 2, or proceed to a panel hearing (Stage 3) and any action taken by the academy as a result (regardless of whether they are upheld). Complaint records will be maintained securely by the nominated complaints coordinator and in line with the Trust Data Protection Policy and Document Retention Policy.

Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection requests access to them.

7.0 Anonymous Complaints

Anonymous complaints will be reviewed to determine whether the information provided is sufficient to warrant further consideration.

The Academy/Trust may investigate an anonymous complaint **only where:**

- It raises safeguarding or welfare concerns, or
- It provides clear, specific and verifiable information.

Where an anonymous complaint does not contain enough detail to investigate, or where the issue cannot be fairly considered without further clarification that cannot be obtained, the Academy/Trust **may decide not to undertake a full investigation.**

As anonymity prevents the Academy/Trust from seeking clarification or providing an outcome, the complaint will be handled on a case-by-case basis, and actions will be limited to what is proportionate and reasonably achievable.

Records will be kept in accordance with the Trust's Data Protection and Safeguarding obligations.

8.0 Complaint Campaigns

A "complaint campaign" is where the Academy/Trust receives a high volume of complaints that:

- Relate to the same issue, event, or decision, and
- Contain substantially similar content or appear to be coordinated.

Where the Academy/Trust reasonably considers a set of complaints to be a complaint campaign, it may adopt a proportionate approach to managing the volume of correspondence. This may include:

- Issuing a **single consolidated response** addressing the key issues raised, or

- Sending a **template response** to complainants.

Individual complainants will still be recorded separately for monitoring purposes, and each submission will be acknowledged.

Rights of complainants

- Where complainants are parents/carers of current pupils, they retain the right to request progression to **Stage 3 (Complaints Panel)** if dissatisfied with the consolidated response.
- The Academy/Trust will determine the most practical method for managing panel hearings in these circumstances, which may include:
 - A single panel hearing covering the shared issues, or
 - Separate hearings where individual circumstances differ significantly.

Limitations

- The Trust will not enter into repeated or duplicated correspondence on matters already addressed in the consolidated response.
- Where complaints contain additional, unrelated issues, these may be dealt with separately under the standard complaints procedure.

9.0 Serial, persistent or vexatious complaints

The Academy/Trust is committed to dealing with all complaints fairly, proportionately and respectfully. However, a minority of complaints may become unreasonable, persistent or vexatious and require the Trust to take proportionate action to protect staff time and wellbeing.

9.1 Serial or Persistent Complaints

A complaint may be considered *serial or persistent* where:

- The same complaint (or a closely related issue) has already been fully addressed under this policy;
- Repeated attempts are made to reopen the matter without new evidence;
- Ongoing correspondence continues after the Trust has provided a clear final position.

Before determining that a complaint is persistent or serial, the Academy/Trust will:

- Review whether the complaint was handled correctly;
- Consider whether any new information has been provided;
- Assess whether continued communication serves a legitimate purpose.

Where the Trust determines that a complaint is persistent or serial, the complainant will be informed in writing that the matter is closed and further correspondence will not be responded to unless new and relevant information is presented.

9.2 Vexatious Complaints

A complaint may be considered *vexatious* where the behaviour of the complainant includes one or more of the following:

- Unreasonably excessive contact, volume of correspondence or repeated demands;
- Harassing, abusive, intimidating or aggressive behaviour towards staff;
- Requests for outcomes that are disproportionate, unrealistic or outside the Trust's remit;
- Pursuing a complaint in a manner intended to cause disruption, burden or distress.

Where a complaint is deemed vexatious, the Trust may implement proportionate restrictions, such as:

- Requiring communication to be directed to a single point of contact;
- Limiting communication to writing only;
- Setting reasonable contact intervals;
- Declining to respond to further correspondence on the matter and pausing the complaints process until the unacceptable behaviour stops.

The complainant will be informed in writing of any restrictions, including their scope and duration. Restrictions will be reviewed periodically to ensure they remain proportionate.

10.0 Complaints raised by those who are not parents / carers of current pupils

Complaints raised by individuals who are not parents/carers of current pupils do not fall under the statutory requirements set out in Part 7 of the Education (Independent School Standards) Regulations 2014, and will be managed under the separate processes in this section (Section 10).

10.1 Scope and Limitations of Non-Parental Complaints

Where a complaint is raised by an individual who does not have parental responsibility, the Academy/Trust will consider the complaint only to the extent that it relates to academy processes, staff conduct, or operational matters. The Academy/Trust cannot discuss or disclose any information relating to an identifiable pupil, including educational, pastoral, safeguarding or medical information.

In managing such complaints, the Academy/Trust will:

- Determine whether the issue can be reasonably considered without accessing or referring to pupil-specific personal data;
- Conduct a proportionate fact-finding review, limited strictly to matters the complainant is legally entitled to raise;
- Seek information from staff where needed, whilst ensuring all pupil information is removed, anonymised, or withheld in accordance with UK GDPR and safeguarding requirements;
- Provide an outcome letter that addresses the procedural or operational aspects of the complaint only, without sharing or confirming any personal data relating to pupils;
- Inform the complainant where an issue cannot be investigated because it would require disclosure of pupil-specific information to which they are not legally entitled.

Where a complaint requires access to information relating to a child, and the complainant does not have Parental Responsibility, the Academy/Trust is unable to proceed with the complaint.

10.2 Outcomes for Complainants who are not parents

Parents are defined as those who have parental responsibility or who have care of a child under section 576 of the Education Act 1996. Where the complainant is not a parent, the Academy/Trust can only respond to matters concerning academy processes, conduct, or service delivery. The Trust cannot share, confirm or discuss any information relating to a pupil.

10.3 Process for Non-Parental Complaints

Complaints made by individuals who are not parents of current pupils, will be managed under this section. The following process applies:

- Complainants should first attempt to raise their concern informally with the relevant Academy or the Trust (as appropriate) by contacting the named person for the Academy/Trust listed in Appendix 2 within **3 months** of the incident or, where a series of associated incidents have occurred, within **3 months** of the last of these incidents. The Academy/Trust will seek to resolve the matter informally within **15 school days**.
- If informal resolution is not possible, the complainant may submit their concerns in writing using the form available at Appendix 1 or via the Academy/Trust website. Appendix 1 (the Complaints Form) is available on all Academy and Trust websites alongside this policy, and complainants should access it from the website or Appendix 1 when submitting a written complaint. Written complaints should be sent to the Chief Executive Officer, or where the complaint relates to the Chief Executive Officer, to the Chair of Trustees.
- The complaint will be acknowledged within **5 school days**, and a final written response will be issued within **15 school days**.
- This process applies **only** to complainants who are not parents/carers of current pupils. With the exception of the section outlining the **Complaints Procedure for parents/carers of current pupils**, the remainder of this policy applies.

***Note:** Where the complaints process has been started (but not completed) whilst parents/carers have children at the Academy, but the children have since left, the procedure for current parents should continue to be used.*

11.0 Monitoring Arrangements

The Trust board/ local governing board will monitor the effectiveness of the complaints procedure in ensuring that complaints are handled properly. The Trust Board/ local governing body will track the number and nature of complaints, and review appropriately.

The complaints records are logged and managed by the clerk to the Trust Board/ local Governing Body

This policy will be reviewed by the Operations Director every year. At each review, the policy will be approved by the Trust Board.

12.0 Quality Assurance

The Trust will:

- Conduct audits of complaint handling.
- Report findings to the Trust Board.
- Use feedback to improve policy and practice.
- Complainants will be provided with the opportunity to provide feedback based on the way in which their complaint has been handled. The Trust will review all feedback received. (recommendation from the internal audit).

13.0 Links with other policies

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Admissions policy
- Exclusions policy

- Staff grievance procedures
- Staff disciplinary procedures
- Staff absence procedures
- SEN policy and information report
- Data Protection Policy and Privacy notices

Appendix 1 - The Challenge Academy Trust Complaints Form

This form should be used to raise a formal complaint only after a matter has been raised informally under section 5 of the Complaints Policy and you are not satisfied with the response. Please refer to the Complaints Policy when completing this form.

The Complaints Form is designed to help capture all relevant information about your complaint and is provided to help ensure that the process can be followed effectively. The expectation is that the vast majority of complaints can be expressed in 3 pages or 1,500 words. Where that is not the case this may result in the Academy / Trust needing to seek further clarification from you which may unavoidably delay the process. Please consider the length of your complaint carefully.

Your details	
Name	
Email	
Address	
Name of pupil, year group and your relationship to them (if applicable)	
Complaint details	
Academy name	
Grounds of complaint <i>Set out the main issue(s), including relevant dates and who was involved. (You do not need to include detailed background information unless it is directly relevant.) Maximum 1500 words</i>	
What steps have been taken to resolve the complaint informally (including details of who the matter was raised with, when and what solution was offered)	
Why have the steps taken so far failed to resolve the complaint? (including what you consider should have been done / where the Academy or Trust has not met reasonable expectations in its response)	
Outcome sought	
What action would you like taken to resolve the matter?	

Signed Date

Please send completed forms to relevant email address stated in Appendix 2 or hand in to the school office in a sealed envelope marked for the attention of the relevant addressee (generally this will be the Principal for complaints about a specific Academy or the Compliance and

Information Manager for complaints about the Trust, however please refer to the Complaints Policy and in particular section 5.2 complaints about specific role-holders, for further information.

Appendix 2 - Trust and Academy Contacts

The Challenge Academy Trust

Address:	TCAT Centre c/o Bridgewater High Academy, Broomfields Rd, Appleton, Warrington, WA4 3AE
Phone no:	01925 263919 x375
Email:	admin@tcat.uk.com
CEO	Mr A Moorcroft
Clerk to the Trust Board	Contact via D. Golden, Trust Compliance and Information Manager at the TCAT Centre
Chair of the Trust Board	Contact via D. Golden, Trust Compliance and Information Manager at the TCAT Centre

Appleton Thorn Primary School

Address:	Arley Rd, Appleton Thorn, Warrington, WA4
Phone no:	01925 266764
Email:	office@appletonthorn.tcat.uk.com
Principal	Mrs Zoe Jones
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Beamont Collegiate Academy

Address:	Long Lane, Warrington, WA2 8PX
Phone no:	01925 579500
Email:	mail@bca.warrington.ac.uk
Principal	Mr P Greenhalgh
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Bridgewater High School

Address:	Broomfields Rd, Appleton, Warrington, WA4 3AE
Phone no:	01925 263919
Email:	enquiries@bridgewaterhigh.com
Principal	Mr K. Powell
Headteacher – Lower Academy	Mrs T. Hatton
Clerk to the Local Governing Body	Mrs J. Stanton
Chair of the Local Governing Body	Contact via the academy

Broomfields Junior School

Address:	Bridge Lane, Appleton, Warrington, WA4 3AH
Phone no:	01925 265297
Email:	reception@broomfieldsjunior.tcat.uk.com
Headteacher	Mrs R Morris Brown
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Dallam Community Primary School

Address:	Boulting Avenue, Dallam. Warrington, WA5 0JG
Phone no:	01925 633927
Email:	d.kendal@dallamprimary.tcat.uk.com
Headteacher	Mrs A Downey
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Great Sankey School

Address:	Liverpool Rd, Warrington, WA5 1SB
Phone no:	01925 728176
Email:	admin@greatsankeyprimary.tcat.uk.com
Headteacher	Ms L Wilding
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Meadowside Community Primary and Nursery School

Address:	Clough Avenue, Warrington, WA2 9PH
Phone no:	01925 632705
Email:	office@meadowside.tcat.uk.com
Headteacher	Mrs C Curtis
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Padgate Academy

Address:	Insall Rd, Warrington, WA2 0LN
Phone no:	01925 822632
Email:	info@padgateacademy.co.uk
Principal	Mr A McMillan
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Penketh High School

Address:	Heath Rd, Warrington, WA5 2BY
Phone no:	01925 722298
Email:	admin@penkethhigh.org
Principal	Mr J Carlin
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Penketh South School

Address:	Finlay Avenue, Penketh, Warrington, WA5 2PN
Phone no:	01925 722298
Email:	office@penkethsouth.tcat.uk.com
Headteacher	Mrs C Lawton
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

Priestley College

Address:	Priestley College, Loushers Lane, Warrington, WA4 6RD
Phone no:	01925 633591
Email:	enquiries@priestley.ac.uk
Principal	Mr G Contos
Clerk to the Local Governing Body	Contact via the college
Chair of the Local Governing Body	Contact via the college

Sir Thomas Boteler Church of England High School

Address:	Grammar School Rd, Warrington, WA4 1JL
Phone no:	01925 722298
Email:	info@boteler.org.uk
Principal	Mrs B Scott-Herron

Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

South Wirral High School

Address:	Plymyard Avenue, Eastham, Wirral, CH62 8EH
Phone no:	0151 327 3213
Email:	schooloffice@southwirral.wirral.sch.uk
Principal	Mr M Cloherty
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy

The Sutton Academy

Address:	Elton Head Road, St Helens, Merseyside, WA9 5AU
Phone no:	01744 678859
Email:	The Sutton Academy - Contact Us
Principal	Mr P Willerton
Clerk to the Local Governing Body	Contact via the academy
Chair of the Local Governing Body	Contact via the academy