

**Schools within the Character Education Trust**

# COMPLAINTS POLICY

<b>Ratified/Reviewed by...</b>	<b>Date</b>	<b>Date to be reviewed</b>
<b>Trust Board</b>	March 2026	March 2027

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## **Equality Statement**

Schools within the Character Education Trust strongly promotes equality of opportunity under all circumstances and in all contexts. Please refer to our Trust's Equality Policy for further information.

## **Introduction**

This policy is based on guidance from the Department for Education and aligns with best practices from similar trusts. It considers all aspects of equality, including gender, disability, ethnicity, sexuality, belief, and age.

At The Character Education Trust, we are committed to providing all students with the highest standard of education while ensuring their health, safety, and wellbeing. We believe in a strong partnership between the school and parents, with each party fulfilling their responsibilities to support students in making the most of their time at The Character Education Trust. If you have concerns about any aspect of the school's operations, whether it is something we are doing or not doing, we encourage you to share your concerns with us through the structured complaints process outlined below.

## **Our Commitment**

We take all concerns and complaints very seriously and are committed to ensuring that parents and carers feel able to raise concerns and make complaints where appropriate.

The Character Education Trust values good relationships and human communication. This is core to our belief that by working together we can better improve the experience of the young people in our care.

Whilst we may not always agree, our goal is to ensure that all our stakeholders are heard, and their concerns addressed in the most appropriate way.

We will ensure that complaints and concerns are responded to quickly and that the aim will always be to resolve any issues.

We will always be polite and fair and ensure you are supported throughout.

All complaints are recorded and logged by the school and the trust and outcomes are reviewed and monitored as part of our commitment to continuous review and improvement of our work.

## **Who can make a complaint?**

This complaints policy and procedure is not limited to parents or carers of children that are registered at schools in the trust. Any person, including members of the public, may make a complaint to a school in the Character Education Trust about any provision of facilities or services that we provide.

Unless complaints are dealt with under separate statutory procedures (such as appeals relating to suspensions, exclusions or admissions), we will use this complaints procedure.

## ParentKind Schools

All of our schools are accredited by the ParentKind charity ensuring that parents are at the centre of the work we do. All schools meet at least standard level accreditation and actively work and aspire to ongoing improvements in our work with our parent communities.

**Before raising a concern or a complaint we ask that all complainants read this helpful and supportive guide to help you with this process.**

<https://www.parentkind.org.uk/assets/parents-resources/Parent-Guide-to-School-Complaints.pdf>

## Raising a Concern or Making a Complaint

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

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

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaint's procedure. The Character Education Trust and its schools take concerns seriously and will make every effort to resolve the matter as quickly as possible.

Unless you feel your complaint relates to serious concerns regarding safeguarding, misconduct or a breach of the law, all complaints should be managed at an informal stage prior to escalation to a formal level and only when unsatisfied with the outcome of this stage of the process.

This will allow your concern/ complaint to be managed quickly and by the right person to support you and your family.

If the school or its leaders feel your complaint should be raised at a higher level, this may be advised. If you have not completed this process prior to making a formal complaint you may be requested to exhaust this process prior to escalation.

## Informal Complaints and Concerns

Unless you feel your complaint relates to serious concerns regarding safeguarding, misconduct or a breach of the law, all complaints should be managed at an informal stage prior to escalation to a formal level and only when unsatisfied with the outcome of this stage of the process.

This will allow your concern/ complaint to be managed quickly and by the right person to support you and your family.

If the school or its leaders feel your complaint should be raised at a higher level, this may be advised. If you have not completed this process prior to making a formal complaint you may be requested to exhaust this process prior to escalation.

## Face to face

In our experience concerns and complaints are best dealt with face-to-face, with an agreed outcome in writing (often via email) following a meeting. Whilst a face-to-face meeting is not in any way mandatory when dealing with a complaint, this more human approach to communication helps both parties understand the nuance of a concern and promotes good relationships and quick resolutions.

Most face-to-face meetings end in a quick and mutually agreeable solution and outcome without the need to escalate further and engage with long and protracted written communications.

We understand that face-to-face is not preferred by all parents but to assist with this and support parents in this process we offer the following:

- The opportunity to be accompanied by a friend, family member, assistant or advisor (with advance notice)
- The opportunity to hold the meeting online via video/ link or by telephone.
- Accessible meeting spaces for parents with disabilities.
- Any other accommodating adaptation for parents with specific physical, emotional or neurodiverse needs.

Some parents may have had a previous bad experience of schools in their childhood or as a parent. It is important that this is not a barrier. We are open, welcoming, supportive and considerate of this and are keen to ensure that past experience does not have a negative impact on your child's experience. If this is the case, let us know, and we will adapt and support you with addressing this.

## Electronically

A concern/ informal complaint can be made/ raised to the school by email and sent directly to the appropriate staff member.

Emails are most appropriate for making the school aware of concerns or requesting a meeting. They are also appropriate for providing evidence attachments.

Emails can be a quick and convenient way to raise concerns. Our staff will endeavour to reply within 48 hours term time and often much sooner. They will be able to take steps to support you and your family as appropriate.

Emails can be misread or can carry unintended tone. It is important to understand these limitations and risks when communicating by email. Where possible these should be clear, concise and polite/ respectful to the recipient.

Support with this is available here:

<https://www.parentkind.org.uk/parent-guide-to-raising-concerns-with-your-childs-school>

## Open Door / Clinics / Parent / Teacher Meetings

Our schools are encouraged to hold regular open-door clinics for parents to ensure you have an opportunity to visit the school and discuss anything you wish to raise with a senior member of the team and the Headteacher. This can also be held online or by telephone on request.

These allow good relationships to be formed between school and home. These meetings are best used for general lower-level concerns although any complaint/ concern level is welcome.

Please contact your school directly for details of the next event.

## Raising a Formal Complaints

At the Character Education Trust we monitor **ALL formal complaints via an online complaints monitoring system.**

Therefore we ask that all formal complaints and concerns are raised via the following link.

Wrotham School	<a href="mailto:wrotham-school@inbox.educationcompanion.com">wrotham-school@inbox.educationcompanion.com</a>
Aylesford School	<a href="mailto:aylesford-school@inbox.educationcompanion.com">aylesford-school@inbox.educationcompanion.com</a>

Using this will ensure that your complaint is responded to quickly, appropriately and in full by the correct person.

This will also enable any investigation to be undertaken and compiled efficiently, with a clear record/ paper trail and escalated through our complaints system as required. This will also ensure you are communicated with and updated throughout the process.

If you make a formal complaint by other methods, we will refer you to this system and can support you in doing this.

## Scope of this complaints procedure

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

Exceptions	Who to contact
<ul style="list-style-type: none"> <li>• Admissions to schools</li> <li>• Statutory assessments of Special Educational Needs</li> <li>• School re-organisation proposals</li> </ul>	<p>For concerns about admissions please see the School's Admissions Policy or contact Kent County Council Admissions team</p> <p>Special Educational Needs: The Complainant can use this policy to complain unless the Complainant's child has an Education Health and Care Plan and the Complainant wishes to appeal against a decision that the Local Authority has taken. If this is the case, the Complainant needs to contact the Local Authority</p> <p>School re-organisation proposals should be raised with the KCC Contact Centre 01622 671411</p>
<ul style="list-style-type: none"> <li>• Matters likely to require a Child Protection Investigation</li> </ul>	<p>Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance.</p>
<ul style="list-style-type: none"> <li>• Freedom of Information</li> </ul>	<p>Subject Access Requests (SARS) and Freedom of Information Requests (FOIR): please see the School's Data Protection and Freedom of Information Policies</p>
<ul style="list-style-type: none"> <li>• Exclusion of children from school*</li> </ul>	<p>Further information about raising concerns about exclusion can be found at: <a href="http://www.gov.uk/school-discipline-exclusions/exclusions">www.gov.uk/school-discipline-exclusions/exclusions</a>.</p> <p><i>*complaints about the application of the behaviour policy can be made through the school's complaints procedure.</i></p>
<ul style="list-style-type: none"> <li>• Whistleblowing</li> </ul>	<p>We have an internal whistleblowing procedure for all our employees, including temporary staff and contractors.</p> <p>The Secretary of State for Education is the prescribed person for matters relating to education for whistleblowers in education who do not want to raise matters direct with their employer. Referrals can be made at: <a href="http://www.education.gov.uk/contactus">www.education.gov.uk/contactus</a>.</p> <p>Volunteer staff who have concerns about our school should complain through the school's complaints procedure. You may also be able to complain direct to the LA or the Department for Education (see link above), depending on the substance of your complaint.</p> <p>Anonymous whistleblowing: Please refer to the School's Whistleblowing Policy</p>

<ul style="list-style-type: none"> <li>• Staff grievances</li> </ul>	Staff grievance, capability or disciplinary; these are covered by separate School Policies and Procedures
<ul style="list-style-type: none"> <li>• Staff conduct</li> </ul>	<p>Complaints about staff will be dealt with under the school's internal disciplinary procedures, if appropriate.</p> <p>Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint. However, the complainant can expect to be notified that the matter is being addressed.</p>
<ul style="list-style-type: none"> <li>• Complaints about services provided by other providers who may use school premises or facilities</li> </ul>	Providers should have their own complaints procedure to deal with complaints about service. Please contact them direct.
<ul style="list-style-type: none"> <li>• National Curriculum - content</li> </ul>	Please contact the Department for Education at: <a href="http://www.education.gov.uk/contactus">www.education.gov.uk/contactus</a>

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or 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 Character Education Trust in relation to their complaint, we will consider whether to suspend the complaints procedure until those legal proceedings have concluded.

## Confidentiality

When making a complaint we will not share your information further than is required to investigate or respond to your complaint, this may also include outside agencies as required within our data sharing agreements. If you require further confidentiality at any level you should make this clear when communicating with the school.

### When requesting confidentiality, you should be aware that:

- This may limit the scope of any investigation.
- May limit any outcomes.
- May restrict or prevent the school from responding in full or meeting your expectations regarding this concern/ complaint.

### We cannot discuss or share information with complainants regarding:

- Outcomes, sanctions and actions taken towards other students.
- Views or opinions of other families/ unless agreed.
- Any staff HR processes or outcomes.
- Personal information about any child other than your own.

## Anonymous Complaints

If you wish to make an anonymous complaint you will accept that you may/ will not receive any information/ details of an outcome.

Unless relating to safeguarding of children or adults, we may not be able to investigate this complaint further.

We cannot share information about a child from an anonymous complainant. All information sharing is restricted to those with parental responsibility that can be proven and is documented.

We will log and take note of all complaints regardless of anonymity and will review internally.

## Non – School Complaints

The schools in our trust will not be able to respond to external/ non-school based complaints when these relate to:

- Complaints about student/ parent conduct outside of school when clearly not connected to the school.
- Complaints about education law/ government or Department for Education policy, legislation or other education matters outside of our control/ remit.
- Complaints about other services – such as the police, health or commercial companies, unless directly employed by the school to undertake work.
- Complaints about local council issues, such as pavements, roads, amenities or public transport unless this relates to the conduct of our students/ staff.

## Malicious, Offensive or Unlawful Complaints

The school will not respond to the following:

- Complaints/ concerns that are unlawful, harassing in nature, or intended to maliciously or inaccurately defame or intimidate students, school staff or school leaders.
- Are substantially aggressive, make threats, use degrading or defamatory language.
- Concerns/ complaints that are clearly and unequivocally false in nature, when made without evidence.
- Are politically motivated or are clearly have ulterior motives to disrupt, cause distress, upset or harm.

## Best Practice – Helping you Make your Complaint

If you have difficulty discussing a concern with a particular member of staff, we will respect your views. In these cases, the complaints coordinator Alex Blake ([ablake@wrotham.kent.sch.uk](mailto:ablake@wrotham.kent.sch.uk)), will refer you to another staff member. Similarly, if the member of staff directly involved feels unable to deal with a concern, Alex Blake will refer you to another staff member. The member of staff may be more senior but does not have to be. The ability to consider the concern objectively and impartially is more important.

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

## **Time scales**

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

## **Complaints received outside of term time**

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

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or 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 a complainant commences legal action against the school or the trust in relation to their complaint, we will suspend the complaints procedure in relation to their complaint until those legal proceedings have concluded.

If a complainant contacts the school/ trust again in relation to their complaint, the correspondence may then be viewed as 'serial' or 'persistent' and the school/ trust will not respond but will continue to complete the initial complaints procedure in full.

## **Duplicate complaints**

After closing a complaint at the end of the complaint's procedure, if the school receive a duplicate complaint from:

- a spouse
- a partner
- a grandparent
- a child

The school will inform the new complainant that the school has already considered that complaint and the local process is complete. The school should advise the new complainant to contact the Department for Education should they be dissatisfied with the school's handling of the original complaint.

Any new aspects to the original complaint will be investigated and dealt with to the full extent of the complaints procedure.

## **Resolving complaints**

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

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

## **Withdrawal of a Complaint**

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

## Stages of the Complaints Process

### Stage One: Informal Complaint Heard by a Staff Member

- Most complaints can be resolved informally.
- If the complainant prefers, they may request to speak with a different staff member.
- If the complaint is made to a Local Governor or Trustee, they will refer the complainant to the appropriate senior staff member at the school.

#### Exceptions:

- If the complaint is about the **Headteacher**, the complaint needs to be raised via the Clerk to the Trust Board and will be referred to the Executive Headteacher.
- If the complaint is about the **Executive Headteacher**, the complaint needs to be raised via the Clerk to the Trust Board and will be referred to the Chair of The Trust Board.
- If the complaint is about a **Local Governor or Trustee**, the complaint needs to be raised with the Clerk to the Trust Board and the complaint will be reviewed by a panel of at least three members of the Trust and will include one independent person.

### Stage Two: Formal Complaint Heard by the Headteacher

- If the issue is not resolved at Stage One, it will be escalated to the Headteacher of the individual school.
- The Headteacher may delegate aspects of the investigation to an appropriate member of staff (they may be referred to as the investigating officer) but the Headteacher will make the final decision and communicate this to the complainant.
- A response will be provided within 10 school working days of the receipt of the complaint
- If the Headteacher is unable to meet this deadline, they will provide the complainant with an update and revised response date.
- If the complainant remains dissatisfied with the response from the Headteacher. A request to escalate to Stage 3 must be made to the Executive Headteacher within 10 school working days of receipt of the Stage 2 response.
- Requests received outside of this time frame will only be considered if exceptional circumstances apply.

### Stage Three: Complaint Heard by the Executive Headteacher

- If the complaint remains unresolved, the complainant can escalate it to the Executive Headteacher.
- The complaint should be submitted in writing, detailing the concerns and previous steps taken. The complaint will not be escalated to the Executive Headteacher in the event that attempts to resolve the complaint at Stage 1 and 2 have not been exhausted.
- The Executive Headteacher may delegate aspects of the investigation to an appropriate member of staff (they may be referred to as the Investigating Officer) but the Executive Headteacher will make the final decision and communicate this to the complainant.
- A response will be provided within 10 school working days of the receipt of the complaint
- If the Executive Headteacher is unable to meet this deadline, they will provide the complainant with an update and revised response date.
- If the complainant remains dissatisfied with the response from the Executive Headteacher. A request to escalate to Stage 4 must be made to the Clerk to the Trust Board within 10 school working days of receipt of the Stage 3 response.
- Requests received outside of this time frame will only be considered if exceptional circumstances apply.

## Stage Four: Complaint Heard by Trustees' Complaint Appeal Panel

- This is the final stage of the Complaints Policy and is applicable if the complainant is still dissatisfied after following the individual school's process, a formal appeal can be made to the Trust's Complaint Appeal Panel.
- A panel will be convened within 20 school working days of the request by the complainant, the panel will comprise three members which will include at least one member who is independent of the management of the school.
- The complainant will be invited to attend the panel to make representations.
- If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.
- The complainant may bring a friend or adviser. This friend or adviser is not permitted to speak at the hearing unless prior consent is given by the chair of the panel. The complainant will need to notify the Clerk to the Trust Board of the name of the friend or adviser and the reason for their request to speak on the complainant's behalf. This request needs to be submitted a minimum of 5 days in advance to provide the chair of the panel adequate time to consider the request and respond appropriately.
- Representatives from the media are not permitted to attend.
- The committee will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the complaint's procedure.
- The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent and the use of the recording will be noted in the minutes taken. Minutes can be requested by the complainant, confidential minutes will not be released.
- The panel's decision will be communicated in writing to the complainant within 20 school working days.

This is the final stage of hearings within the school trust. Following this, no further escalation of the complaint can be made to the school or the trust.

## Next Steps

If the complainant believes the school / trust did not handle their complaint in accordance with the published complaints procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the Department for Education after they have completed Stage 4.

The Department for Education will not normally reinvestigate the substance of complaints or overturn any decisions made by The Character Education Trust. They will consider whether the school 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 Department for Education with their online form: [https://form.education.gov.uk/service/Contact\\_the\\_Department\\_for\\_Education](https://form.education.gov.uk/service/Contact_the_Department_for_Education)

## APPENDIX A: Roles and Responsibilities

### Complainant

The complainant will receive a more effective response to the complaint if they:

- explain the complaint in full as early as possible
- co-operate with the school in seeking a solution to the complaint
- respond promptly to requests for information or meetings or in agreeing the details of the complaint
- ask for assistance as needed
- treat all those involved in the complaint with respect
- refrain from publicising the details of their complaint on social media and respect confidentiality.

### Investigator

The investigator's role is to establish the facts relevant to the complaint by:

- providing a comprehensive, open, transparent and fair consideration of the complaint through:
  - sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved
  - interviewing staff and children/young people and other people relevant to the complaint
  - consideration of records and other relevant information
  - analysing information
- liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right.

### The investigator should:

- conduct interviews with an open mind and be prepared to persist in the questioning
- keep notes of interviews or arrange for an independent note taker to record minutes of the meeting
- ensure that any papers produced during the investigation are kept securely pending any appeal
- be mindful of the timescales to respond
- prepare a comprehensive report for the headteacher or complaints committee that sets out the facts, identifies solutions and recommends courses of action to resolve problems.

The headteacher or complaints committee will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details.

**Complaints Officer** (this could be the headteacher / designated complaints governor or other staff member providing administrative support)

### The complaints officer should:

- ensure that the complainant is fully updated at each stage of the procedure
- liaise with staff members, headteacher, Clerk and LAs (if appropriate) to ensure the smooth running of the complaints procedure
- be aware of issues regarding:
  - sharing third party information
  - additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person

- keep records.

### **Clerk to the Complaints Panel**

The Clerk is the contact point for the complainant and the committee and should:

- ensure that all people involved in the complaint procedure are aware of their legal rights and duties, including any under legislation relating to school complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR)
- set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible
- collate any written material relevant to the complaint (for example; stage 1 paperwork, school and complainant submissions) and send it to the parties in advance of the meeting within an agreed timescale
- record the proceedings
- circulate the minutes of the meeting as requested
- notify all parties of the committee's decision.

### **Committee Member**

Committee members should be aware that:

- the meeting must be independent and impartial, and should be seen to be so
- No governor/trustee may sit on the committee if they have had a prior involvement in the complaint or in the circumstances surrounding it.
- the aim of the meeting should be to resolve the complaint and achieve reconciliation between the school and the complainant
- We recognise that the complainant might not be satisfied with the outcome if the meeting does not find in their favour. It may only be possible to establish the facts and make recommendations.
- many complainants will feel nervous and inhibited in a formal setting  
Parents/carers often feel emotional when discussing an issue that affects their child.
- extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting
- Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated.
- The committee should respect the views of the child/young person and give them equal consideration to those of adults.
- If the child/young person is the complainant, the committee should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the committee should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend.
- However, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the committee considers is not in the child/young person's best interests.
- the welfare of the child/young person is paramount.