COMPLAINTS POLICY

Version control	
Complaints Policy 2026-09-21	Update to 8.4 and 9.1
Complaints Policy 2026-04-01	Re-write of policy
Complaints Policy 2025-09-01	Reviewed with no amendment
Complaints Policy 2023-10-01	Update to 5.2.4 to further clarify stage two complaints. Update to section 6 regards complaints about Trustees or the Trust Board Update to section 7 about referring complaints after completion of the Academy's procedures as per DfE model policy
Complaints Policy 2021-09-01	Updates through the document to provide additional clarification of the different procedural stages
Complaints Policy 2019-11-19	Updates to reflect change of governance arrangements and to rename the procedural stages
Complaints Policy 2019-03-22	New interim policy based on template policy provided by The Key pending review September 2019
Complaints Policy August 2018	Updated based on the Trust's original policy template

Date of next review:	**April 2028**	**Owner:**	**Director of HR & Compliance**
Type of policy:	**Trust Template**	**Approving Body:**	**Executive Operational Board**

1. Aims

Each Trust School will meet its statutory obligations in accordance with the policies and practice of the Aspirations Academies Trust when responding to concerns and complaints from parents of its pupils, and others.

We aim to:

- Establish what has happened
- Establish who was involved
- Identify the resolution the complainant feels would resolve the matter
- Be impartial and non-adversarial
- Facilitate a full and fair investigation
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the outcome can feed into the Academy's improvement evaluation processes to prevent recurrence
- The policy will always be made available on the Academy's website.

2. Legislation and guidance

This document meets the requirements set out in the best practice guidance for Academies complaints procedures updated March 2021 (DFE), as noted in part 7 of the education (independent school standards) regulation 2014.

This policy complies with our funding agreement and articles of association.

3. Definitions and scope

3.1 Definitions of *concerns* and *complaints*

The DfE guidance explains the difference between a concern and a complaint.

- A **concern** (informal) is defined as "an expression of worry or doubt over an issue considered to be important for which reassurances are sought" or when a parent identifies a small problem

- A **complaint** (formal) is defined as "an expression of dissatisfaction however made, about actions taken or a lack of action"

The Academy aims to resolve concerns through day-to-day communication as far as possible. Where matters are progressed as complaints, the Academy aims to address them at the earliest possible stage. This policy sets out the procedures for doing so while also setting out how complainants may escalate their concerns if they remain dissatisfied.

3.2 Exceptions to this policy

It is important your concern is directed to the correct team, if it relates to any of the following matters please refer to the guidance indicated below.

Exceptions	Further information
● Allegations of child abuse /other child protection issues ● Other safeguarding issues	Immediately report your concern to a teacher, Designated Safeguarding Lead or Principal. ***Refer to the Academy's Safeguarding Policy.*** You can also report concerns about how child protection issues are being handled in your own or another organisation to the NSPCC's whistleblowing advice line on 0800 028 0285 or at help@nspcc.org.uk.
● Statutory Assessment of SEN	Check the Academy's SEND offer and report your concern to the SENCO or Principal. *While concerns about the statutory assessment of SEN are outside the scope of the Complaints Policy, concerns/complaints relating to the Academy's support of pupils with SEN are within scope.*
● School Admissions including appeals	Refer to the Academy's Admissions Policy available on the Academy's website.
● Pupil Exclusions	Refer to the Academy's Behaviour Policy available on the Academy's website.
● Whistleblowing (for financial or other regulatory malpractice)	Refer to the Whistleblowing Policy available from the Principal or otherwise contact compliance@aspirationsacademies.org
● Staff grievances /disciplinary procedures	Staff of the Academy wishing to raise concerns (other than those for which the Whistleblowing Policy would be applicable) should refer to the Grievance Policy. The Disciplinary Policy sets out how the Academy will address matters relating to staff conduct. These policies are available from the Principal or otherwise contact compliance@aspirationsacademies.org
● External suppliers	If your concern relates to services of the Academy provided by an external service provider, this should be raised with a member of the Academies leadership team, but it might be that you or the Academy will have to follow the provider's own complaints policy thereafter.
● Early years	**Complaints about our fulfilment of early years requirements** We will investigate all written complaints relating to the Academy's fulfilment of the Early Years Foundation Stage requirements, and notify the complainant of the outcome within 28 days of receiving the complaint. The Academy will keep a record of the complaint (see section 9) and make this available to Ofsted on request.

	Parents and carers can notify Ofsted if they believe that the Academy is not meeting Early Years Foundation Stage requirements, by calling 0300 123 4234 or 0300 123 4666, or by emailing enquiries@ofsted.gov.uk. An online contact form is also available at: https://www.gov.uk/government/organisations/ofsted#org-contacts. We will notify parents and carers if we become aware that the Academy is to be inspected by Ofsted. We will also supply a copy of the inspection report to parents and carers of children attending the setting on a regular basis.

Please note, where the Academy's actions are pursuant to specific requirements of an external body (e.g. local authority or Department for Education), complainants will be asked to refer their concern directly to that authority.

3.3 Time lines

Please note any references in this policy to timescales refer to "term time days". These are days within the Academies when the provision is open to Students. Therefore, if a concern is made on the last day of a term the response will be made at the start of the new term.
The Academy will acknowledge your concern within 5 term days. Where further investigations are necessary, a new timescale will be communicated regarding timeframes This should be no more than 10 school days and the academy will ensure that parents and students are supported throughout this process. (In the event that the complaint is highly complex or lengthy the timescale for investigation may be increased to 3 months)

Concerns/complaints should be made as soon as possible after an incident arises and no later than 3 months afterwards, to ensure a fair investigation can be undertaken. The Academy will consider exceptions to this time frame in circumstances where there were valid reasons for not raising the concern, however it is possible that recall of events or situations may not be as comprehensive.

4. Resolution of concerns

4.1 Informal Concerns

Parents, carers and others who have a concern that is covered by this policy (see section 3.2 for exceptions) must make their concern to the Academy informally at an early stage so that they can be addressed in the spirit of partnership.

You may raise your concern with a Teacher, Subject Co-ordinator, Head of Year, Head of House, Business Manager, Assistant Principal, Vice Principal, Associate Principal or Principal.
Concerns may be raised in person, over the phone or over email exchanges.

Such concerns will generally be raised and responded to orally and a written record of the concern will not necessarily be kept; this depends on the complexity. If a resolution is not reached at this point, the person raising the complaint may progress to stage 1 formally, equally leaders may refer the concern to stage 1 if they feel conflicted or unable to resolve it fairly.

Concerns will only be deemed as complaints when the correct complaints form have been used that are attached to this policy. We encourage all complainants to work collaboratively at this stage to enable a resolution that allows us to continue focusing on supporting all students.

5. How to Raise a Concern or Complaint, the use of Artificial Intelligence (AI) and Social Media

5.1 Provisions on how to raise a formal complaint are set out in sections 6.1, 7.1, and 7.6 of this policy.

5.2 The Academy recognises that complainants may use technology to assist in drafting correspondence. However, we strongly encourage complainants to use their own words to describe their concerns and the specific resolution they are seeking.

Complainants should be aware that:

- **Accuracy:** AI-generated content often cites legislation or guidance incorrectly. The Academy will investigate complaints based on the facts of the case and current statutory requirements, regardless of any automated legal citations provided.
- **Clarity:** Where a complaint is generated using AI and is excessively long, complex, or contains irrelevant information, the Academy may ask the complainant to provide a concise summary of their specific concerns before resolution proceeds. Where a concise summary is not provided and correspondence is multi-pages long, the time to investigate may take up to three months.
- **Human-Led Resolution:** As per our commitment to a non-adversarial process, we prioritise human-to-human dialogue. The use of AI-generated templates to create a 'legalistic' tone can hinder informal resolution. We reserve the right to hold a meeting (in person or via video link) to ensure we have a clear, human understanding of your concern before moving to a formal investigation.

To ensure that complaints are considered fairly, objectively and without undue influence, all parties are expected to respect the confidentiality of the complaints process.

- Parents and carers should not publish or share details of an active complaint, associated evidence, or allegations relating to staff, pupils or the school on social media or other public forums while the investigation is ongoing. Public commentary may compromise the integrity of the investigation, impact the ability to gather evidence fairly, and potentially prejudice the outcome.
- Where information relating to a complaint is published publicly, the school or trust reserves the right to determine whether the complaints process can continue in a fair and credible manner. In such circumstances, the school may pause or discontinue the investigation and record the complaint as closed.
- The school also reserves the right to take appropriate action where statements made publicly are defamatory, malicious, or knowingly false and cause harm to individuals or the reputation of the school. This may include seeking removal of the material, pursuing legal remedies where appropriate, and determining that the complaint will not be progressed further through the school's complaints procedure.

The Trust respectfully asks that any complaints are focused and clear, whilst leaders are focusing on pages of communications this is less time spent supporting and developing education for pupils. If we are efficient at understanding your issue, we can learn lessons, improve processes and prevent recurrence and this will support collaborative partnering and your experience will be positive.

6 Stage One Formal Complaint

6.1 If a concern is raised as set out in section 4 above, but the person raising the concern is dissatisfied with the response and/or outcome, then they may make a complaint by completing the Stage One Complaint Form at the end of this document and submit it only to the local academy Principal.

Please note complaints must be completed on the correct form with full information to aid resolution or will be deemed as concerns and follow no formal process.

Once the stage one complaints form has been received, The Principal will then allocate a Complaints Manager. This may be the School Business Manager, Assistant Principal, Vice Principal, Associate Principal, another identified member of the leadership team or themselves. If the onsite team do not have capacity or are conflicted in the investigation/concern, the Principal will declare this to the Trust and the Trust will allocate a leader from another school to hear the stage one formal concern.

6.2 Please note if the stage one formal concern is against the Principal the provisions set out in section 12 are applicable.

6.3 Written correspondence to the Principal should be sent to the Academy's postal address or emailed to the school office. Any complaints sent to the Aspirations Head Office will be redirected to the local school.

6.4 Where a complaint is raised with the Principal without the matter having first been raised as set out in section 4, the Principal may revert to the first part of the informal process before the matter is progressed to formal stage one.

6.5 Stage one formal complaints will be acknowledged upon receipt by the school office. Within 5 school days a discussion or meeting will take place, this may be in person or online to discuss resolution options.
Please note that the formal investigation into your complaint will not proceed until this meeting has taken place to ensure the appointed Manager fully understands the nature of your complaint and the resolution you are seeking. Any complainant who does not engage fully with the process to enable the school to investigate the complaint effectively will be deemed as closed by failure to engage. Equally meetings will be set by mutual agreement with a maximum of 1 occasion to postpone or rearrange.

In the discussion with the complainant, the Manager will seek to clarify the nature of the complaint (e.g. what happened and who was involved) and the resolution the complainant is seeking (i.e. the measures the complainant would like the Academy to take in relation to the matter they are complaining about). The Manager will also identify the date by which they expect to communicate the outcome to the complainant. For less complex matters the Manager should aim to be in a position to communicate an outcome within 5 term-time working days of the discussion with the complainant, and in all remaining circumstances where complaints are more complex, 10 days. Any changes to this timeline will be communicated but should not exceed one month from the date the complaint was originally acknowledged.

6.6 After conducting appropriate enquiries, the Manager should prepare a written report outlining details of:

- the concern and the resolution sought by the complainant
- the findings of the investigation
- the conclusions drawn and outcomes necessary to resolve the concern

6.7 The report will be referred to by the Manager when communicating the outcome to the complainant. The initial communication of the outcome may be made by telephone, online or in person and confirmed in writing. The report will not be shared if the matters relate to safeguarding or security. Nor will it be shared if there is a need to ensure data protection legislation is observed or if there are sensitive employee matters contained within the report.

6.8 If the complainant is dissatisfied by the response from the Manager and/or the outcome then they must raise the matter within 10 school days of the outcome and the stage two process will be instigated.

7 Stage Two Formal Complaint

7.1 Stage two complaints must be made by completing the Stage Two Complaint Form and be submitted to the local academy Principal. A Director of Education, Principal, senior manager or member of the EOB will be appointed to hear the stage two complaint.

Please note complaints must be completed on the correct stage 2 form with full information to aid resolution.

7.2 Generally, a stage two complaint will be an escalation of a matter previously considered under the stage one formal process.

(i) Where this arises because the complainant is dissatisfied with the findings or outcomes from the stage one process or with how the stage one process was managed (e.g. if they consider the process did not consider all parts of their original complaint) they should provide details of what they believe were the shortcomings and the resolution they are seeking.

(ii) Where the escalation arises partly because of new incidents that relate to the same matter that was considered under the stage one process, the complainant should provide details such as relevant dates, times, and the names of witnesses of the new events, alongside copies of relevant documents, and what they are seeking as a resolution to their complaints. If the matters being raised are wholly new, or separate, then the Complainant will be directed towards raising a new Stage One Formal Concern.

The stage two Senior Complaints Manager will arrange a discussion with the complainant to clarify the details of the complaint and the measures the complainant is seeking as a resolution. The discussion should normally be arranged to take place within 5 term-time working days of the stage two complaint being received. The notification of the discussion should be confirmed in writing and include confirmation that it forms part of the stage two complaints procedure. The discussion may be by telephone, in person meeting or online meeting. The investigation and review of the stage one outcome will not commence until this discussion has been held with the complainant.

Any complainant who does not engage fully with the process and meeting to enable the school to investigate the complaint effectively will be deemed as closed by failure to engage. Meetings will be made by mutual agreement and rescheduled or postponed only once

7.3 The complainant may be accompanied by a relative or friend and should inform the Academy of the identity of their companion in advance. In certain circumstances, the Academy may need to refuse a request for a particular individual to attend any such meeting/discussion – for example, if there is a conflict of interest. If this is the case, the Academy will notify the

complainant as soon as they are aware, so that the complainant has the opportunity to arrange for someone else to accompany them.

7.4 The Senior Complaints Manager will then review the stage one outcome and the complainant's reasons for escalation to stage two. The review will be supplemented with their own additional enquiries as required and they will also write a written report of their findings. The report will not be shared if the matters relate to safeguarding or security. Nor will it be shared if there is a need to ensure data protection legislation or if there are sensitive employee matters contained within the report.

7.5 The Senior Complaints Manager will then communicate the outcome to the complainant in writing.

7.6 In the unusual event that the matter is not resolved by the Senior Complaints Manager, the complainant has the right to appeal the stage 2 findings. The appeal must be submitted in writing within 10 days of the decision to compliance@aspirationsacademies.org, FAO the Trust's Director of HR and Compliance. The communication must clearly state the reason for the appeal and the resolution required.

8 Appeal to Complaint Review Panel

8.1 The Trust's HR & Compliance team will oversee arrangements for the matter to be considered by the Complaint Review Panel. The panel will consist of three members from the following groups:

- A member of any Regional Board.
- A member of the Executive Operational Board.
- A member of the Trust Board.
- An external advisor, this may be an independent person or legal professional

8.2 The Panel shall nominate a Chair.

8.3 The members of the panel will have access to the existing records associated with the complaint from all stages of concern.

8.4 The Complaint Review Panel will usually be held within 20 term time days of receipt of the Stage 2 Appeal letter. The complainant will be invited to attend the meeting and will be given at least 5 term time days' notice. Nevertheless, the Complaint Review Panel reserves the right to convene at their convenience rather than that of the complainant. The complainant will be invited to submit documentation that they consider is relevant to their complaint.

8.5 The complainant may be accompanied by a relative or friend at the meeting, but generally not legal representation.

8.6 The panel may invite various representatives from any of the processes to meet with them in order that questions can be asked, however this process may be undertaken separately in different meetings with panel members.

8.7 Once the process is complete the panel must then determine its findings from the case, draw conclusions and make recommendations, including the identification of appropriate actions.

8.8 The panel Chair or the Clerk acting on their behalf will inform the complainant and other relevant parties of the decision in writing within 10 term-time days.

8.9 The decision of the panel is final and the complaint will be considered resolved and closed.

8.10 For avoidance of doubt, an appeal panel will not be convened in circumstances that relate to

a complainant targeting a specific individual. This is to ensure the employer meets its responsibilities to the employee and the complaint will be deemed closed at stage 2 with no right to appeal and internal employment law practices will supersede this proceeding.

9 Persistent complaints and complaint campaigns

9.1 Unreasonably persistent complaints

Where a complainant tries to re-open an issue with the Academy after the complaints procedure has been fully exhausted and the Academy has done everything it reasonably can in response to the complaint, the Chair of the Regional Board or Director of HR & Compliance (or other appropriate person in the case of a complaint about the Chair) will inform the complainant that the matter is closed.

If the complainant subsequently contacts the Academy again about the same issue, the Academy can choose not to respond. The normal circumstance in which a response will not be sent in the following circumstances:

- The Academy has taken every reasonable step to address the complainant's needs
- The complainant has been given a clear statement of the Academy's position and their options.
- The complainant is contacting the Academy repeatedly but making substantially the same points each time, without presenting new evidence.
- The complainant places a disproportionate burden on staff or unreasonable demands on school staff time.
- There is good reason to believe the individual is contacting the Academy with the intention of causing disruption or inconvenience.
- The individual's letters/emails/telephone calls are often or always abusive, aggressive, threatening, offensive, personal insulating or discriminatory language to either staff or the organisation.
- Refusing to accept the outcome of a complaint after all stages of the complaints procedure have been exhausted.
- Sending large volumes of correspondence or contacting multiple members of staff simultaneously regarding the same issue.
- Publishing or threatening to publish defamatory or misleading information about the school, its staff or other pupils.
- Recording or distributing communications in a way that undermines the integrity of the complaints process.
- Refusing to engage with reasonable attempts to resolve the complaint.

Where behaviour becomes unreasonable, the school or Trust may take proportionate steps to manage communication. These steps may include:

- requesting that communication is directed through a single named contact
- limiting communication to written correspondence only
- setting reasonable limits on the frequency or length of communication
- requiring that correspondence relates strictly to the complaint under investigation
- declining to respond to correspondence that repeats issues already addressed

Once the Academy has decided that it is appropriate to stop responding, the complainant will be informed in writing, either by letter or email.

The Academy will also ensure that when making this decision, complainants making any new complaint are heard, and that the Academy acts reasonably.

9.2 Complaint campaigns

Where the Academy receives a large volume of complaints about the same topic or subject, especially if these come from complainants unconnected with the Academy, the Academy may respond to these complaints by:

- Publishing a single response on the Academy website
- Sending a template response to all of the complainants

If complainants are not satisfied with the Academy's response, or wish to pursue the complaint further, the normal procedures will apply.

10 Record-keeping

The Academy will record the progress of all complaints, including information about actions taken at all stages, the stage at which the complaint was resolved, and the final outcome. The records will also include copies of letters and emails, and notes relating to meetings and phone calls.

This material will be treated as confidential and held locally until stage 3, at which point it will then be held centrally Representatives of the Aspirations Academies Trust Board (e.g. senior members of the Trust's central management team) may also have access to the records as part of the Trust's monitoring of the practice of the Academy.

The records must also be made available to the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act where they request access to them. Relevant parts of the record or summary information may also be relevant for scrutiny or reporting in accordance with a freedom of information (FOI) request or the complainant making a subject access request under the General Data Protection Regulation.

Records of complaints will be kept securely, only for as long as necessary and in line with data protection law, the Academy's privacy notices and Trust policy as may be amended from time to time concerning management of records.

11 Learning lessons

The Complaints Managers will be responsible for identifying learnings at each stage where appropriate, respecting confidentiality, to determine whether there are any improvements that the Academy can make to its procedures or practice to help prevent similar events in the future.

12 Complaints against Principals

Complaints that relate to the conduct of the Principal or escalate a complaint that the Principal considered as the Investigating Manager or Senior Investigating Manager should be addressed to the Chair of the Regional Board. This must be in writing addressed for the attention of the Chair of the Regional Board, email compliance@aspirationsacademies.org.

This will be a two-stage process conducted by the Chair of the Regional Board, Member of the EOB or a Director of Education. If a conclusion is not achieved by the 1st meeting a second senior manager from the same job group will hear the complaint independently at stage 2. The outcome will be stated and the complaint deemed closed.

For avoidance of doubt a public panel will not be convened in circumstances that relate to the targeting of specific individuals to ensure the employer meets its responsibilities to the employee.

13 Complaints against Trust Senior personnel

Complaints that relate to the following job groups should be referred to compliance@aspirationsacademies.org

- Chief Education Officer
- Chair of the Regional Boards
- Directors of Education
- Chief Operations and Finance Officer
- Remaining Members of the Executive Operational Board

Complaints will be reviewed by the Trust's Managing Director, Deputy Managing Director or Director of HR and Compliance and if they are unable to resolve them an independent legal advisor will be appointed to advise. This will be a one tier process with an outcome stated and the complaint closed.

One tier processes are necessary due to the hierarchical structure of the business as the layers of senior management have been exhausted.

Complaints against Managing Director, Deputy Managing Director or Director HR

Complaints against the Managing Director, Deputy Managing Director or Director of HR & Compliance must be submitted in writing to the Chair of Trustees and a copy sent to the Clerk to the Trust Board. The correspondence should be sent to Aspirations Academies Trust, World Business Centre 3, Heathrow Airport, Newall Road, Hounslow, TW6 2TA. Alternatively email compliance@aspirationsacademies.org marking that your email is for the personal attention of the Chair of Trustees / Clerk to the Trust Board.

In these circumstances the Chair of Trustees will appoint a legal advisor to advise and complete a one stage process with an outcome stated and the complaint closed as the hierarchical structure of the business has been exhausted. The use of legal advisors in complaints will only be used as a last resort as it is not deemed good use of public funds.

14 Referring complaints on completion of the Academy's procedures

Once a complaint is closed, if the complainant believes the 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 (DfE) after the completion of the 'Appeal to Complaint Review Panel' process (5.3).

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

The complainant can refer their complaint to the Department for Education online at: www.education.gov.uk/contactus, by telephone on: 0370 000 2288 or by writing to:

Department for Education
Piccadilly Gate
Store Street
Manchester
M1 2WD.

Stage One Complaint

Please complete and return to the Principal of ACADEMY NAME who will acknowledge receipt and explain what action will be taken.

Academy Stage One Complaint	
Name	
Pupil/Student name (if relevant)	
Your relationship to the Pupil/Student (if relevant)	
Full Address (Including Postcode)	
Email address	
Mobile telephone number	
Home telephone number	
Other daytime telephone number (Work etc)	
Please give details below of your concern, including who you have spoken to at the academy about it.	
What actions do you feel might resolve the problem at this stage?	
Are you attaching any paperwork? If so, please give details.	
Signature	
Date	
Official Use Only	
Date acknowledgement sent	
Sent by whom	
Complaint referred to	
Date	

Stage Two Complaint Form

Please complete and return to the Principal of ACADEMY NAME who will acknowledge receipt and explain what action will be taken.

Academy Stage Two Complaint	
Name	
Pupil/Student name (if relevant)	
Your relationship to the Pupil/Student (if relevant)	
Full Address (Including Postcode)	
Email address	
Mobile telephone number	
Home telephone number	
Other daytime telephone number (Work etc)	
Please give details of why you feel dissatisfied with the findings or outcomes from the stage one process or with how the stage one process was managed (e.g. if you believe the process did not consider all parts of your original complaint).	
If the escalation to stage two is partly or wholly because of new incidents that relate to the same matter that was considered under the stage one process, you should provide details such as relevant dates, times, and the names of witnesses of the new events	
How do you wish to conclude this matter, what is the remedy you are seeking.	
Signature	
Date	
Official Use Only	
Date acknowledgement sent	
Sent by whom	

Academy Stage Two Complaint	
Complaint referred to	
Date	