KEYS ACADEMIES TRUST

Complaints Policy and Procedure Version 1.1

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1. Policy Statement

1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.

1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.

1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

2. Change Summary

2.1. This policy is a full re-write of the former Trust Complaints Policy and Procedure, and follows the Stone King model process.

3. Introduction

3.1. The aim of this policy is to resolve complaints or concerns about Keys Academies Trust (the "Trust"), any Academy within the Trust or any individual connected with the Trust, in a fair, thorough and transparent way. The Trust takes complaints seriously and views them as a chance to learn and improve for the future. Every effort will be made to resolve complaints close to where the complaint emanated from.

3.2. Anyone can make a complaint, but a different process applies depending on whether the person raising the complaint is a parent/carer[1] of a current pupil at an Academy within the Trust. Please refer to Part A below if you are a parent of a current pupil, otherwise please see Part B.

3.3. 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 in Part C.

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

3.5. Those considering raising a complaint are reminded that the Academy's core purpose is to educate and safeguard pupils. It has a responsibility, as a publicly funded body, to allocate its resources proportionately and fairly. Complainants are therefore requested to cooperate with this process, and to be mindful of the length and volume of correspondence. This will also assist with ensuring a prompt and effective resolution.

3.6. The national charity Parentkind has published Department for Education (DfE) endorsed guides for parents and for schools in relation to resolving complaints on its website[2]. All complainants are encouraged to read the Parentkind guidance before raising a complaint under this procedure.

Part A – Complaints procedure for parents/carers of current pupils[3]

4. Stage 1: Informal resolution

4.1. 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 the appropriate member of staff, most likely the class teacher, Head of House, Curriculum Area Leader (secondary), Subject Leaders, Phase Leader (Primary), School Business Manager or member of the senior leadership team before a request is made to deal with it under the formal stages of this policy.

4.2. 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.

4.3. The Academy will acknowledge the concern or complaint within **3** school days and will seek to resolve matters at the informal stage within **15** school days[4] of the issue being raised by the parent.

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

5. Stage 2: Formal resolution: investigation by a nominated individual

5.1. Stage 2 complaints must be set out in writing, using the form accessible here (or via the form available at **Appendix 1**, if unable to access the online form) within **10** school days of the Stage 1 response and addressed to the Headteacher of the Academy (unless the complaint relates to the Headteacher, in which case please refer to the 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.

5.2. The Headteacher will acknowledge the complaint within **3** school days. They will appoint an appropriate individual to undertake an investigation, who may may offer the complainant a meeting. The investigator will speak to others involved. Whenever reasonably possible, any meeting with the complainant will take place within **15** school days of the written complaint being received.

5.3. 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.

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

6. Stage 3: Formal resolution: Complaints Committee Meeting

6.1. Stage 3 complaints must be set out in writing, stating where the parent remains dissatisfied and the outcome sought, and lodged with the Head of Governance within **10** school days of the Stage 2 response.

6.2. The Head of Governance will acknowledge the Stage 3 complaint within **3** school days and will convene a Complaints Committee.

6.3. The Complaints Committee must comprise at least three people, which will include at least one Trustee and one person who is independent of the management and running of the Academy.

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

a) a member of the Academy Committee of the Academy where the complaint emanated from;

b) a member of an Academy Committee from another Academy within the Trust;

c) a member of the Board of Trustees from the Trust;

d) a member of an Academy Committee or Trustee of another Academy Trust; and/or

e) a person not connected with the Academy or the Trust, as required by the Education (Independent School Standards) Regulations 2014, which apply to academies. This person will be identified by the Head of Governance / Clerk when convening the panel.

Trustees will always be invited to sit on a Complaints Committee panel.

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

The independent panel member may be a member of an Academy Committee from another Academy within the Trust as long as they have no conflict and no prior knowledge of the complaint.

The Head of Governance will invite the Academy to put in writing its response to the Stage 3 complaint and to submit this within **15** school days of receiving the request. Whether or not the Academy has responded, the Head of Governance will

convene a meeting of the Complaints Committee. That meeting will be held on Academy premises, or virtually via video conferencing software if all parties agree, 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 Committee. 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 and any documentation to be considered at the meeting will be shared with all parties at least 5 school days in advance, wherever possible.

6.4. The meeting is not a court case, it will be held in private and will be as informal as circumstances allow. For this reason, electronic recordings of meetings or conversations are not permitted unless a parent's disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before the recording of the meeting takes place. Consent will be recorded in any minutes taken. The parent will have the opportunity to put forward her/his reasons for dissatisfaction and to enlarge on them but may not introduce reasons that were not previously put in writing. The Complaints Committee 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 Committee members will be able to ask questions. The parent will have the opportunity to make final comments to the Complaints Committee.

6.5. The Complaints Committee may uphold, partially uphold, or not uphold the complaint. It may also make recommendations, whether or not the complaint is upheld. The Committee's findings 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 and the Chief Executive Officer.

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

At any meeting, the parent will be entitled to bring one companion along to provide support. Legal representation will not be normal practice. If an interpreter is required, this may be in addition to the nominated companion.

6.6. If the parent fails to attend the Complaints Committee Meeting on the day without compelling reasons, the Complaints Committee meeting will proceed in their absence and the process will continue to its conclusion. Any further attempt to re-

open the matter will be considered as falling under the "Serial or persistent Complainants" section as set out below.

7. Department for Education

7.1. 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 Committee Meeting within the time stated in the policy) the matter is closed. If the Complainant is still not satisfied, then they may contact the Department for Education (DfE). There is an online procedure at:

https://www.gov.uk/complain-to-dfe

7.2. The Complainant may also write to the DfE at:

Ministerial and Public Communication Division

Department for Education 2nd Floor,

Piccadilly Gate

Manchester

M1 2WD

8. Complaints against specific role-holders

8.1. Complaints against the Headteacher

Any complaint relating to the Headteacher of the Academy must be raised in the first instance with the Chief Executive Officer who will, if an informal resolution cannot be reached, designate an appropriate individual to investigate the complaint as per **Stage 2**.

8.2. Complaints against a member of the Academy Committee / the Academy Committee

Where a complaint is brought against a member of the Academy Committee, it should be raised with the Chair of the Academy Committee, who will investigate the complaint (or appoint another member of the Academy Committee to do so) in the same way as in the first stage of the formal process at **Stage 2**.

If the complaint is against the Chair of the Academy Committee or the whole Committee, then the Chair of Trustees will investigate the complaint (or appoint another Trustee or appropriate individual to do so) in the same way as in the first stage of the formal process at **Stage 2.** Such complaints should be referred to the Head of Governance in the first instance.

8.3. 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 Head of Governance. In the case of a complaint against either the Chair or the Board of Trustees as a whole, then it should be put in writing to the Head of Governance 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 in the first stage of the formal process at **Stage 2**.

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

8.4. 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 the first stage of the formal process at **Stage 2**.

Part B – Complaints raised by those who are not parents/carers of current pupils

9. Complaints made by those who are not parents of current pupils, which includes complaints made by parents of former pupils after they have left the Academy

9.1. Complainants should first attempt to address their complaint to the relevant Academy or the Trust (as appropriate) informally by raising the matter with a relevant member of Academy or Trust staff, 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 (depending on the nature of the complaint) will seek to resolve the matter informally within **15** school days.

9.2. If it is not possible to resolve the matter informally, the complaint may be submitted in writing, using the form available at **Appendix 1**, to the Chief Executive Officer, or, where the complaint relates to the Chief Executive Officer, to the Chair of Trustees.

9.3. The complaint will be acknowledged within **3** school days and a final written response will be issued within **15** school days.

9.4. The general provisions set out in Part C below apply.

Part C – General provisions

10. Complaints that will not be considered under this policy

10.1. 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

10.2. Complaints may be raised under this policy about staff conduct, however, any action taken under the Trust's internal disciplinary procedures is confidential and Complainants will not be provided with information about this.

10.3. Where the scope of a complaint is unclear, the Academy / Trust may write to the complainant seeking clarification and/or summarising what the key grounds of complaint are understood to be and/or may request a meeting with the complainant for this purpose.

Matter	Route for raising concern/complaining
Admissions	Admissions Appeal – see Admissions Policy and Statutory Admissions Appeal Code, or complain to DfE
Exclusions	Statutory review process – see Suspensions and Exclusions Policy
Statutory SEN assessments	SEND Tribunal (and see SEN Code of Practice)
Matters likely to require child protection investigation	Complaints about child protection matters are handled under our Safeguarding and Child Protection Policy and in accordance with relevant statutory guidance. Raise with Designated Safeguarding Lead or a direct referral can be made to the Multi-Agency Safeguarding Hub (MASH) and/or Local Authority Designated Officer (LADO) LADO: 01733 864083 LADO@peterborough.gov.uk MASH: 01733 864180 (Mon – Fri 9am to 5pm) Out of Hours Emergency Duty Team (EDT): 01733 234724

Data protection/FOIA	Raise with the Trust GDPR Lead in the first instance via GDPR@keystrust.org, who can escalate to the Data Protection Officer (DPO) if required – see Data Protection Policy, Freedom of Information Policy and Privacy Notices. Complaints may also be raised with the Information Commissioner's Office but we ask that you try to resolve these via the DPO first.
Staff Grievances and Disciplinary matters[5]	Staff Grievance Procedure Staff Disciplinary Rules and Procedure
Whistleblowing	Whistleblowing Policy
Third party contractors/suppliers	Third party complaints process

11. Complaints relating to fulfilment of the Early Years Foundation Stage ("EYFS") requirements

11.1. 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 Headteacher will investigate the concern or complaint, which may include meeting with the Complainant and the Head of Early Years. A written response notifying the Complainant of the outcome of the investigation will be sent within 28 school days of the complaint being received.

c) Where the Complainant remains dissatisfied, the Clerk will ensure that a formal Complaints Panel will be convened in accordance with Stage 3 of this policy.

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

11.3. Parents are further advised that, where they have concerns regarding the Academy meeting EYFS requirements, they may contact Ofsted on 0300 123 4666.

12. Complaints received outside of term time

12.1. 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.

13. Withdrawal of a complaint

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

13.2. A complaint will be deemed to have been withdrawn if the Investigating Officer has made every endeavour to investigate the complaint and not received a response from the complainant within ten school days.

14. Record keeping and confidentiality

14.1. 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 Complaint Committee hearing (Stage 3), and any action taken by the School as a result (regardless of whether they are upheld). Complaint records will be maintained securely and in line with the Data Protection and Records Management Policies by the Head of Governance and Executive Team Assistant. 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.

14.2. The Complainant should also keep all correspondence, statements and records relating to their complaint confidential, and should not disclose (by way of electronic communication, social media or otherwise) any information or documents relating to their complaint.

14.3. Academy Committees will be informed in the Headteacher's regular report to governors of all formal complaints received, whether they were resolved following Stage 2, or proceeded to a Complaint Committee hearing (Stage 3), and any action taken by the Academy as a result (regardless of whether they were upheld). They will also receive an annual summary report. Trustees will receive an annual summary report of the same information from all Academies in the Trust.

15. Anonymous complaints

15.1. Where an anonymous complaint is received, the Academy / Trust will use its reasonable endeavours to consider the complaint as best as it reasonably can. However the Academy / Trust will not be required to consider the complaint pursuant to any specific process and will handle anonymous complaints on a case-by-case basis.

16. Complaint campaigns

16.1. Where the Academy / Trust receives a number of complaints all based on the same subject which, in its reasonable opinion, may be deemed a 'complaint campaign', it will deal with the complaints in the following way: individual responses will not be sent to Complainants in such cases. Instead, either a template response will be sent to all Complainants or a single response will be published on the Academy / Trust's website at the discretion of the Headteacher / Chair of Trustees.

16.2. Where the complaint campaign involves Complainants who are parents, they will be entitled to escalate the complaint to a Complaint Committee hearing if they are dissatisfied with the Academy/Trust's response. The Academy/Trust will consider how best to manage Complaint Committee hearings in such circumstances.

17. Artificial intelligence

17.1. In line with the Parentkind parent guide to school complaints, complainants are urged to exercise caution in the use of Artificial Intelligence (AI) in complaint processes as it can introduce an unnecessarily legalistic and contentious approach that is not conducive to resolving the issue in a human way. AI can also introduce inaccurate information, including misstating law, and make a complaint more complex than necessary.

17.2. Complainants are reminded that publicly available AI platforms and chatbots are not confidential. Complaints, and in particular those containing the personal data of pupils, staff and other individuals therefore should not be uploaded to or processed via platforms such as ChatGPT.

18. Serial or persistent Complainants

18.1. If at any level a Complainant or connected party attempts to reopen an issue or a closely related issue that has already been dealt with under this Complaints Policy, the CEO may write to the Complainant to inform them that the procedure has been exhausted, the matter is closed and that the Trust will therefore not respond to any further correspondence on this issue or a closely related issue.

18.2. See the Trust's Unreasonable Behaviour - Barring from School Premises Policy and also note the option to implement a communication plan for complainants who make excessive contact with a Trust school, causing a significant level of disruption. Such a plan may include but is not limited to:

a) identification of a single point of contact in school;

b) limited contact, at the school's discretion, which could be one telephone call a week;

c) conversations being minuted, at the discretion of the school.

19. Vexatious complaints

19.1. Complaints with the following characteristics may be deemed to be vexatious:

a) obsessive, persistent, harassing, prolific, repetitious;

b) insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;

c) insistence upon pursuing meritorious complaints in an unreasonable manner;

d) complaints which are designed to cause disruption or annoyance;

e) demands for redress that lack any serious purpose or value.

19.2. In such cases, the CEO may write to the Complainant to inform him/her that the complaint is deemed to be vexatious and to give him/her an opportunity to change their approach. Should the complaint continue to be raised in a vexatious manner, the CEO will write to the complainant confirming that the Trust will not respond to any further correspondence on this issue or a closely related issue.

19.3. The DfE Best Practice Guidance for Academy Complaints Procedures will be taken into account in reaching any decision to stop responding. Specifically, the following criteria will usually be met:

a) the Academy / Trust will have taken every reasonable step to address the complainant's concerns;

b) the complainant will have been given a clear statement of the Academy/Trust's position and their options; and

c) the complainant contacts the Academy/Trust repeatedly, making substantially the same points each time.

19.4. The case to stop responding will be stronger if one or more of the following applies:

a) the complainant's letters, emails, or telephone calls are often or always abusive or aggressive;

b) the complainant makes insulting personal comments about or threats towards staff;

c) the Academy / Trust has reason to believe the individual is contacting them with the intention of causing disruption or inconvenience.

19.5. Complainants are also referred to the Parentkind parent guide to school complaints which emphasises the importance of trying to work with the school to resolve the issue and explains steps that schools may take where complainants act unreasonably including pausing the complaint, issuing a warning and, in cases of persistent or extreme abusive behaviour, banning the complainant from the school site.

20. Legal proceedings and other parallel processes

20.1. If a Complainant threatens or commences legal action against the Academy/Trust (including the issuing of a letter before claim) in relation to their complaint, we will consider whether to suspend the complaints procedure in relation to their complaint until those legal proceedings have concluded.

20.2. 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.

20.3. If the complainant submits a subject access request alongside their complaint, this will not normally result in the complaint process being suspended.

[1] References to 'parents' in this policy include carers.
[2] https://www.parentkind.org.uk/parent-guide-to-raising-concerns-with-your-childs-school
[3] 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.
[4] School days in this policy refers to days when the Academy is open to pupils for teaching, and does not include INSET days.
[5] 5 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.

21. Version History

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Policy rewritten using model Stone King document, with feedback received from the Trust Executive and Headteachers groups	Emma STEPHENS-DUNN	25/06/2026
1.1	Minor amendment to introduce new Online Form for complaints	Niamh WALSH	08/10/2026

22. Appendix 1: Trust Complaints Form

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

We would ask that all complaints are submitted via our Online form: https://keystrust.riskmate.co.uk/add-complaint however if this is not accessible, we ask that this form is completed instead.

22.2. 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. You will note that 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)*	

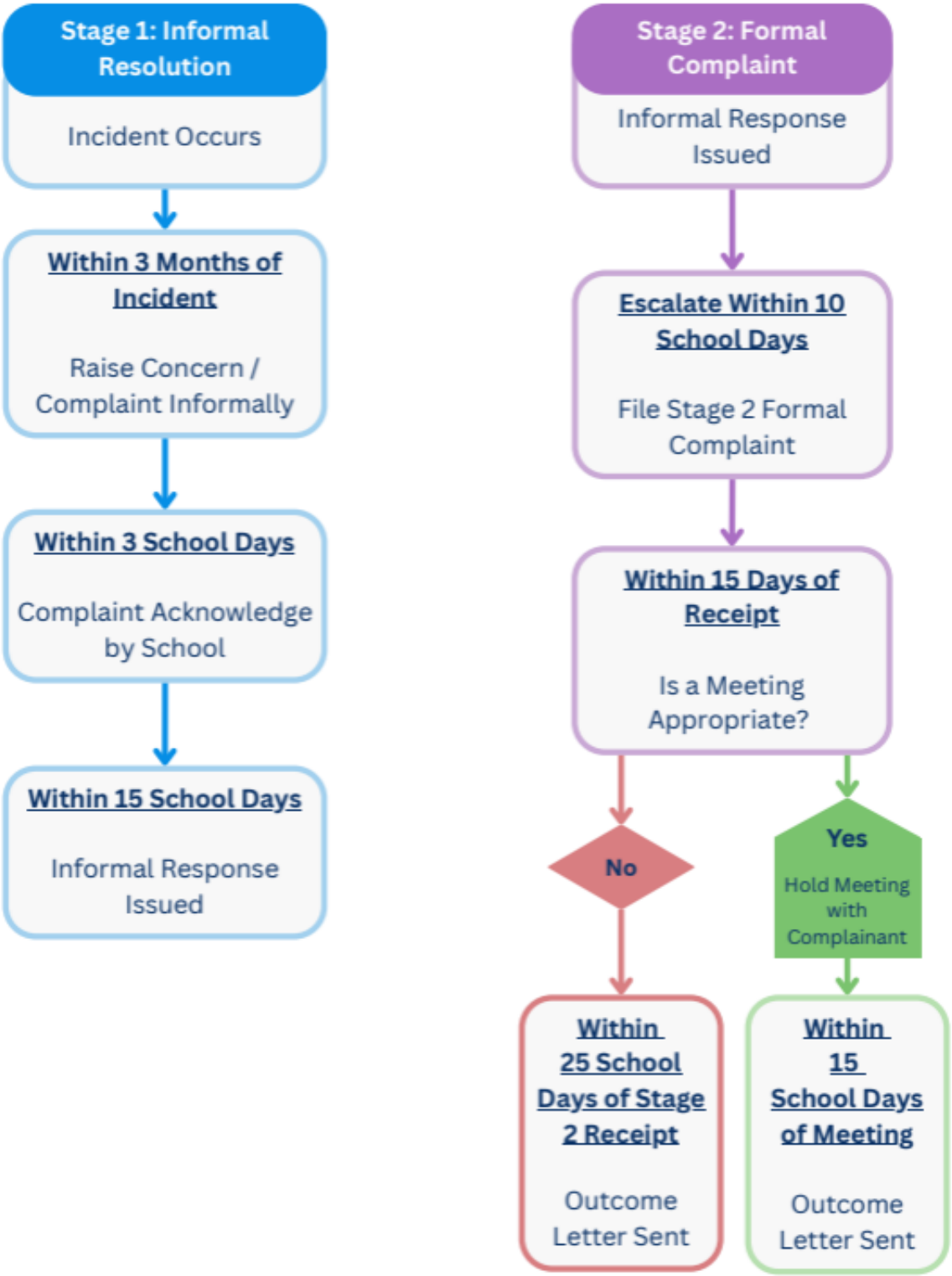
Complaint details	
Academy name *(if complaint relates to a specific Academy)*	

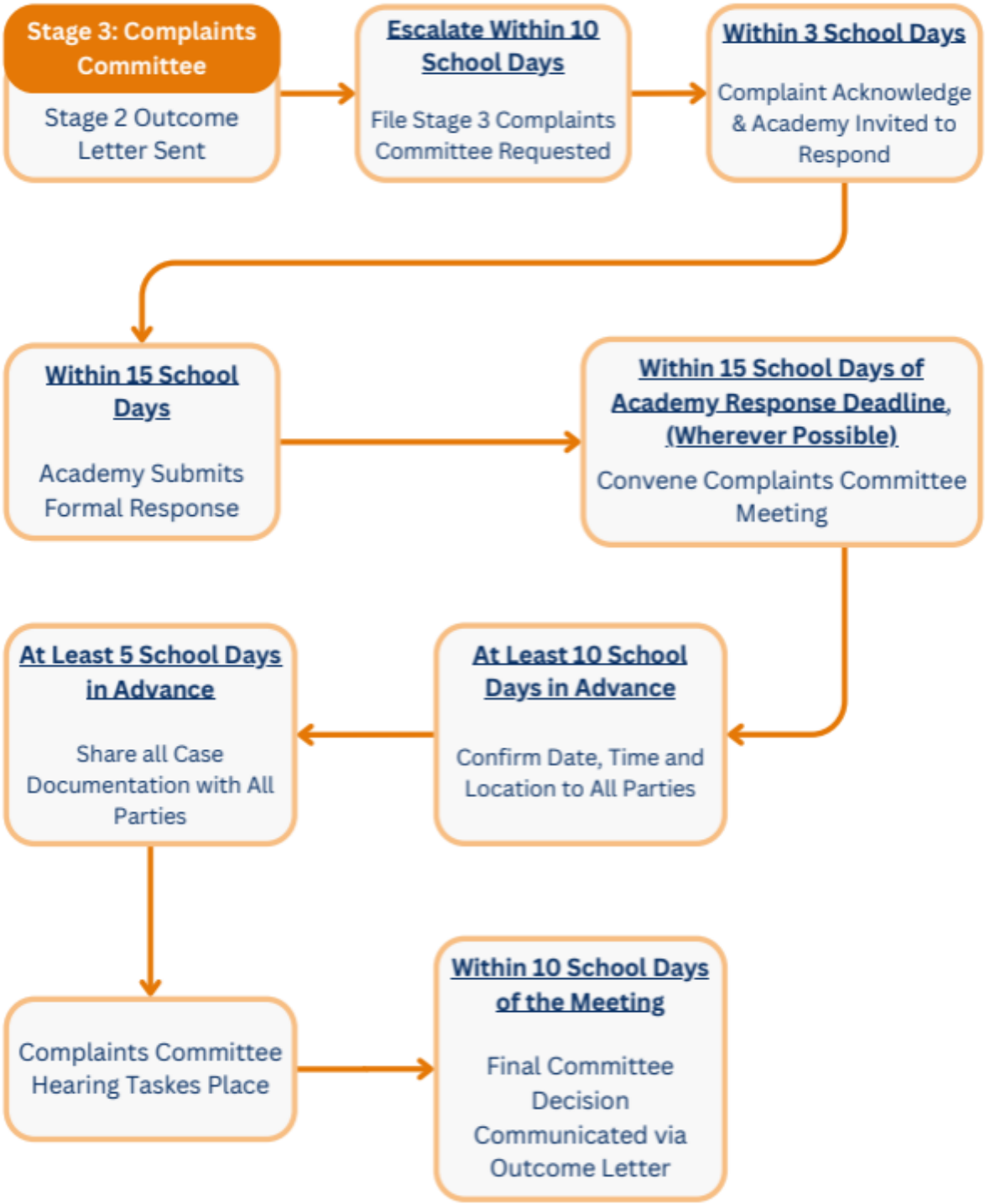
Grounds of complaint	
What steps have been taken to resolve the complaint informally ***(including details of who the matter was raised with, when and what solution was offered)***	
Why have the steps taken so far failed to resolve the complaint? ***(including what you consider should have been done/where the Academy or Trust has not met reasonable expectations in its response)***	
What action would you like taken to resolve the matter?	

Signed ..... Date .....

22.3. Please send completed forms to enquiries@keystrust.org or hand in to the school office in a sealed envelope marked for the attention of the relevant addressee (*generally, this will be the Headteacher for complaints about a specific Academy, or the Head of Governance for complaints about the Trust, however, please refer to the Complaints Policy and in particular paragraph 8, 'Complaints about specific role-holders', for further information).*

23. Appendix 2: Timeline for Complaints Process




Stage 3: Complaints Committee
Stage 2 Outcome Letter Sent
Escalate Within 10 School Days
File Stage 3 Complaints Committee Requested
Within 3 School Days
Complaint Acknowledge & Academy Invited to Respond
Within 15 School Days
Academy Submits Formal Response
Within 15 School Days of Academy Response Deadline, (Wherever Possible)
Convene Complaints Committee Meeting
At Least 10 School Days in Advance
Confirm Date, Time and Location to All Parties
At Least 5 School Days in Advance
Share all Case Documentation with All Parties
Complaints Committee Hearing Taskes Place
Within 10 School Days of the Meeting
Final Committee Decision Communicated via Outcome Letter