Waterton
Academy Trust

Complaints Policy

2026-27

watertonacademytrust.org

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How to use this policy

This policy explains how concerns and complaints can be raised and how they will be considered by the school and the trust. Most issues are best resolved through early discussion, and the policy sets out a clear, staged process for doing so, with formal escalation routes where concerns remain unresolved.

Complainants are encouraged to read the relevant sections carefully and to use the flowchart at Appendix 2 to understand how the process works and what to expect at each stage.

Introduction

This policy sets out the trust-wide approach to dealing with concerns and complaints, and as such is applied to all Waterton Schools and Pre-Schools. This procedure complies with the requirements set out in Part 7 of the Education (Independent School Standards) Regulations 2014 and reflects the Department for Education's best practice guidance for academies' complaints procedures.

Aims and Responsibilities

We always aim to maintain positive relationships with parents and carers and do our best to address any concerns as soon as they arise. We would always aim for all parents and children to have a positive experience in their school; however, we are aware that in some instances a parent/carer may wish to make a complaint. We additionally acknowledge that other stakeholders may wish to raise a concern or complaint with Waterton Academy Trust.

We value good relations with parents and the community and will therefore do everything we can to establish and maintain them. This includes seeking to resolve any concerns or complaints promptly, and to the satisfaction of all concerned.

As an organisation, we welcome feedback on what stakeholders feel we do well, or not so well. We will consider carefully all feedback, whether positive or negative, and will review our policies and practices accordingly. We acknowledge that complaints are a way in which schools can learn and improve.

We will treat all concerns and complaints seriously and courteously and will advise the complainant of Waterton Academy Trust's procedures for dealing with their concerns.

All staff and governance representatives of Waterton Academy Trust will be made aware of this policy and will be familiar with procedures for dealing with concerns and complaints, to which they will have access as required.

Understanding this procedure

Who can make a complaint?

This complaints procedure is not limited to parents or carers of children registered at a Waterton academy or pre-school. Any person, including members of the public, may make a complaint about a school or about any provision of facilities or services provided by the trust. Where complaints are subject to separate statutory procedures, such as admissions or exclusion appeals, those procedures will apply instead.

The difference between a concern and 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'. A concern may become a complaint if a complainant remains dissatisfied following informal discussion or seeks formal consideration under this procedure.

Safeguarding concerns

Any safeguarding concerns or allegations raised with the school or the trust will be managed under separate safeguarding and child protection procedures and will not be considered under this complaints policy while those procedures are ongoing.

This includes allegations that any person working in a school may have:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or relating to a child
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Once safeguarding processes have concluded, complaints about the handling of a safeguarding matter may be considered under this policy, subject to any statutory or legal constraints.

Expectations of complainants

Waterton Academy Trust is committed to dealing with all concerns and complaints fairly, proportionately, and in line with this published procedure. To support timely and effective resolution, we ask that complainants:

- raise concerns and complaints using the stages set out in this policy and allow each stage to conclude before escalating
- communicate respectfully with staff, leaders, trustees, and governors at all times
- focus complaints on actions, decisions, or processes, rather than on individuals
- avoid raising the same issues repeatedly once they have been fully considered and responded to
- refrain from contacting multiple members of staff, trustees, or governors simultaneously about the same matter

- do not publish or discuss complaints on social media or other public forums.

The trust does not tolerate abusive, threatening, or aggressive behaviour towards staff, pupils, or volunteers. Where such behaviour occurs, or where contact becomes excessive or unreasonable, the trust may take proportionate action to manage communications, pause the complaints process, or restrict contact, in line with relevant policy and guidance, including the trust's Code of Conduct for Parents and Visitors (published on the Waterton Academy Trust website). These expectations are intended to protect staff and pupils, ensure fairness for all parties, and enable complaints to be resolved as effectively and promptly as possible.

Use of drafting assistance
The Trust recognises that complainants may choose to seek assistance when preparing correspondence, including from family members, advocates, legal representatives or digital drafting tools, including AI. The use of such assistance does not affect how a complaint will be considered.

However, complainants remain responsible for ensuring that any complaint submitted accurately reflects their own concerns, the facts as they understand them, and the outcomes they are seeking. The Trust may ask complainants to clarify, simplify or particularise complaints where submissions are excessively lengthy, repetitive, generic, internally inconsistent, or where it is unclear which matters require investigation.

Principles of Resolution

Early and informal resolution

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. Our aim will always be to resolve the matter as quickly as possible.

Impartiality and alternative points of contact

If a complainant has difficulty discussing a concern or complaint with a particular member of staff, we will respect these views and will refer the matter to another appropriate staff member. Similarly, if the member of staff directly involved feels unable to deal with the matter objectively, it will be referred to another member of staff.

Overview of the complaints process

Concerns

Initially, all concerns will be dealt with informally, by an appropriate member of the school staff team. A concern may be raised in person, in writing or by telephone, and should be brought to the attention of the class teacher or Headteacher/Head of School. It may be that

this is referred to another staff member. This will be reviewed, and reassurances provided in a manner appropriate to the nature of the concern.

If a parent, carer or other stakeholder continues to have a concern after reassurances have been provided, they may wish to consider submitting a complaint.

Complaints

Where a concern has not been resolved through informal discussion, or where a matter is raised as an informal complaint (as opposed to a concern) from the outset, it will be addressed under the Informal Stage of this procedure. It is expected that all parties seek to resolve the matter at this stage wherever possible.

If the matter remains unresolved following the Informal Stage, it may be escalated to formal Stage 1a, at which point the complaint will be considered by the Headteacher or Executive Headteacher.

If the complainant remains dissatisfied with the outcome of Stage 1a, they may request escalation to Stage 1b. Requests should normally be submitted within 15 school days of receiving the Stage 1a outcome, although later requests may be considered where exceptional circumstances apply. At Stage 1b, the CEO or Deputy CEO will commission a review of the complaint and its handling, with further investigation undertaken where necessary in accordance with this procedure.

Where a complaint proceeds directly to Stage 1b, without a previous formal investigation at Stage 1a, a full investigation will be undertaken.

Should the complainant remain dissatisfied following Stage 1b, they may request escalation to Stage 2 within 15 school days of receiving the Stage 1b outcome. At Stage 2, an independent panel will consider the complaint in accordance with this procedure.

Complaints Procedure Stages

The informal stage – initial contact with the academy

- In the first instance concerns or informal complaints should be raised informally through the child's class teacher (or the school office if the complainant is a non-parent).
- If the issue is not resolved through this initial contact, or if the complaint concerns the class teacher, then it may be raised with the Headteacher or Head of School. The Headteacher or Head of School may delegate review of this complaint to another appropriate leader in school.
- All members of staff are aware of the complaints procedure and are able to refer the issue to the most appropriate person with responsibility for the area of concern. Staff are expected to make clear notes of the details of the complaint and to follow up after the matter has been referred.
- If the matter cannot be resolved immediately, contact will be made either by telephone, in person or in writing to arrange a convenient time to discuss the issue(s).
- Any actions or monitoring of the situation that has been agreed will be confirmed either verbally or in writing.

- If necessary, we will contact appropriate people who may be able to assist us with our enquiries into the issue.
- An update on the progress of our enquiries will normally be made within ten working days (school days). Once we have responded to a complaint, the complainant will have the opportunity to ask for the matter to be considered further.
- If the complaint concerns the Head of School, the above informal procedure will still apply, however concerns should be raised informally with the Executive Headteacher.
- If the complaint concerns the Executive Headteacher or Headteacher, the above informal procedure will still apply, however concerns should be raised informally with the CEO or Deputy CEO reachable via admin@watertonacademytrust.org or 01924 240767. The CEO or Deputy CEO may delegate review of this concern to an appropriate senior leader.

Formal consideration of the complaint – Stage 1a

Submitting a Stage 1a complaint

Complaints at Stage 1a are usually expected to be submitted in writing. Where a complainant feels unable to articulate their concerns in writing, the complaint may be made verbally, and a member of staff will make a written record of the complaint on their behalf.

Directing the complaint

With the exception, of complaints that relate to the Executive Headteacher, Headteacher, central team member or the CEO:

- complaints should be addressed to the Headteacher or Executive Headteacher of the school, via the school office.

In the case of:

- A complaint about the Headteacher or Executive Headteacher, or a member of the trust central team, the complaint must be directed to the CEO, reachable via admin@watertonacademytrust.org or 01924 240767. The complaints coordinator may ask the complainant to complete a short form to help clarify the issues raised and ensure the complaint is directed appropriately.
- A complaint about the CEO, the complaint must be directed to the Chair of Trustees, reachable via admin@watertonacademytrust.org or 01924 240767.

Where a complaint is about the Headteacher or Executive Headteacher, or a member of the trust central team, the CEO or Deputy CEO will hold responsibility for Stage 1a and may delegate the investigation to a suitable senior trust leader, while retaining oversight and decision-making responsibility.

Stage 1a investigation process

Before commencing a Stage 1a formal investigation, the Stage 1a investigator will establish that an attempt at informal resolution has been made and that this avenue has been exhausted.

The complaint will be acknowledged in writing within 3 working days of receipt, and a copy of this procedure will be provided.

The complaint will normally be investigated and responded to within 15 working days. Where this is not possible, the complainant will be informed of the reason for the delay and given a revised response timeframe.

As part of the investigation:

- The investigating officer will normally invite the complainant to a meeting or discussion to clarify the issues raised, explore the desired outcomes, and ensure the complaint is fully understood. The complainant may be accompanied for support if they wish.
- Witnesses may be spoken to and statements taken where necessary
- Relevant policies and procedures may be reviewed.
- Where a complaint relates to a pupil, discussions will normally take place with parental involvement. However, where seeking parental consent would delay, compromise, or prejudice the effective handling of the complaint or the welfare of the pupil, the school may speak with the pupil without prior parental consent. In such cases, appropriate safeguards will be in place, including the presence of a suitable member of staff and careful consideration of the pupil's age, understanding, and wellbeing.
- If a complaint concerns a member of staff, aspects of the matter may be considered under the trust's internal HR procedures where appropriate.
- Records will be kept of meetings, conversations, and relevant documentation.

Outcome

Once the relevant facts have been established, a written response will be issued to the complainant. Where follow-up action is required, this will be set out clearly, and a further meeting may be offered to discuss the outcome.

If the complainant remains dissatisfied with the outcome, the complaint may be escalated to Stage 1b, as set out below.

Any request to escalate must be made within the timescales set out in this procedure. Where no request for escalation is received within that timeframe, and the Trust has not agreed that exceptional circumstances apply, Stage 1a will be regarded as concluded and the complaint will be closed. The Trust will not normally reopen or reinvestigate matters that have already been considered under this procedure unless significant new evidence, a material procedural error, or other exceptional circumstances justify further consideration.

Formal consideration of the complaint – Stage 1b

When Stage 1b applies

Stage 1b may be requested where a complainant remains dissatisfied following the outcome of Stage 1a, or where a complaint proceeds directly to Stage 1b because it relates to the Executive Headteacher, Headteacher, or a senior trust leader and has not been considered at Stage 1a.

Purpose of Stage 1b

- Where a complaint has already been considered in full at Stage 1a, Stage 1b is not a reinvestigation by default. In these cases, its purpose is to provide assurance that the

complaint has been handled appropriately, proportionately, and in line with this procedure, and that the decision reached at Stage 1a was reasonable based on the information available at the time. Further investigation will only be undertaken where there is evidence of procedural error, significant new information, or a clear indication that the matter has not been considered fully or fairly.

- Where a complaint proceeds directly to Stage 1b, for example because it relates to the headteacher or a senior trust leader and has not previously been considered, Stage 1b will constitute a full and substantive investigation of the complaint.

How Stage 1b is carried out

At Stage 1b, a formal investigation will be commissioned by the CEO or Deputy CEO. They will determine the investigating individual or team, which may include suitable members of the trust Executive Leadership Team, senior colleagues from other schools within the trust, external partners, and or governance representatives, as appropriate.

The investigation may include:

- a review of the process followed at earlier stages, where applicable
- consideration of the substance of the complaint
- the investigating officer will normally invite the complainant to a meeting or discussion to clarify the issues raised, explore the desired outcomes, and ensure the complaint is fully understood. The complainant may be accompanied for support if they wish
- discussions with relevant witnesses and the taking of statements
- discussions with pupils where appropriate, with suitable safeguards in place
- reference to relevant policies and procedures

Timescales and outcome

The trust will normally aim to complete Stage 1b and issue a written response within 15 working days. Where this is not possible, the complainant will be informed of the reason for the delay and given a revised response timeframe.

As with Stage 1a, a formal written outcome will be shared with the complainant on completion of Stage 1b.

The CEO, as investigation commissioner, may determine that all reasonable steps have been taken to resolve the complaint and may decide to close the complaint at this stage. This means that the Trust is satisfied that the complaint has been fully and fairly considered in accordance with this procedure, and that further investigation would not be likely to change the outcome.

If the complainant remains dissatisfied, they may request that the complaint is reviewed at Stage 2 in accordance with this procedure. Any request for Stage 2 must be made within the published timescale. Where no request for Stage 2 is received within that timeframe, and the Trust has not accepted that exceptional circumstances apply, the complaint will be regarded as concluded and closed.

The Trust will not normally reopen or reinvestigate matters that have already been considered under this procedure unless significant new evidence, a material procedural error, or other exceptional circumstances justify further consideration.

Correspondence received after the complaint has been concluded which raises substantially the same issues will normally be treated as a continuation of the original complaint rather than as a new complaint.

Stage 2 - Consideration by an appeal panel

Right to request Stage 2
If the complainant remains dissatisfied following the outcome of Stage 1b, they may request escalation to Stage 2**.** Requests for escalation should normally be submitted within 15 school days, although later requests may be accepted where exceptional circumstances apply.

Purpose of Stage 2
Stage 2 is intended to provide an independent review of how the complaint was handled. It is **not** a fresh investigation of the original complaint and is not intended simply to provide a further opportunity to disagree with the conclusions reached or to ask a different decision-maker to substitute their own judgement where the complaint has already been investigated fairly and thoroughly.

The purpose of Stage 2 is to provide assurance that the complaint has been considered fairly, proportionately and in accordance with this procedure, and that the conclusions reached were reasonably open to the investigator on the evidence available at the time.

Stage 2 Appeal Panel

If convened, the panel will independently review the complaint.

The panel will consider whether:

- the complaint was investigated fairly, proportionately and in accordance with this procedure;
- the investigation was reasonable in the circumstances;
- relevant evidence was identified and properly considered;
- the findings and conclusions reached were ones that a reasonable investigator could properly reach on the information available at the time; and
- any material procedural error, significant new evidence or exceptional circumstance justifies varying the outcome or making recommendations.

The panel is not required to conduct a fresh investigation or to reconsider every aspect of the complaint where it is satisfied that those matters have already been investigated appropriately.

Stage 2 represents the final stage of the Trust's internal complaints procedure. Where a Stage 2 panel is convened, the Trust will normally aim to hold the panel meeting within **20 working days (school days)** of the decision to proceed to Stage 2.

Following consideration of the complaint, the panel may:

- uphold the complaint in whole or in part;
- dismiss the complaint;
- make recommendations to improve policy, practice or procedures;
- recommend that aspects of the complaint be reconsidered where procedural deficiencies are identified.

The panel does not have the power to overturn lawful management decisions but may make recommendations where it identifies procedural, governance or practice issues.

Requesting Stage 2

When requesting escalation to Stage 2, the complainant should clearly identify:

- the aspects of the complaint with which they remain dissatisfied following Stage 1b;
- the reasons they believe the complaint has not been resolved or handled appropriately;
- any specific points where they consider this procedure has not been followed correctly;
- any significant new evidence that they believe could reasonably affect the outcome; and
- the outcome they are seeking.

A request for Stage 2 should explain why the complainant believes the investigation or decision was flawed. Mere disagreement with the findings, repetition of matters already considered, or a request for a different decision-maker to reconsider the same evidence will not normally, of itself, justify progression to a Stage 2 panel.

New complaints or unrelated matters will not normally be considered at Stage 2 and should be raised separately in accordance with this procedure.

Preparing for Stage 2

Following receipt of a request for Stage 2, the Trust will review the request to identify the matters that remain unresolved and the issues to be considered by the panel. The complainant may be asked to further clarify the aspects of the complaint with which they remain dissatisfied, the reasons for their dissatisfaction, any significant new evidence and the outcome they are seeking. This process is intended to clarify the scope of the Stage 2 review and assist the efficient conduct of the panel. It does not constitute a further investigation or reconsideration of matters that have already been resolved to the complainant's satisfaction.

Panel Composition

Stage 2 will be considered by a panel of at least three people who have had no prior involvement in the complaint. At least one panel member will be independent of the management and running of the school concerned and will have had no prior involvement in the complaint.

Attendance at the panel hearing
Following submission of a Stage 2 request, the Chair of the panel will determine whether it is appropriate and helpful to invite the complainant to attend a panel meeting. Attendance is not automatic and will be considered on a case-by-case basis, having regard to whether attendance would assist the panel in reaching a fair and proportionate decision. 1. Where the panel decide to invite the complainant and the school, they will be informed, at least five working days (school days) in advance, of the date, time and place of the meeting.

Where the complainant is invited to attend, the school and the investigating officer will also be invited to attend to ensure a fair and balanced process. All parties will have the opportunity to present their views and respond to questions through the Chair.

Where an invitation to attend is issued but it is not possible to agree a mutually convenient date and time, the panel reserves the right to proceed based on the written submissions, in order to avoid unreasonable delay.

If invited to attend, the complainant may be accompanied by a support person. The role of the accompanying person is to provide support to the complainant and to observe the proceedings. They will not normally be permitted to speak on the complainant's behalf or address the panel directly. Where a complainant requires a reasonable adjustment to enable full and effective participation, the Chair may make appropriate arrangements, including permitting limited support from an accompanying person, where this is necessary and proportionate.

Panel papers and evidence
A comprehensive panel pack will be prepared for the Stage 2 hearing. This will include a chronology of the complaint, relevant correspondence, records of decisions made at earlier stages, investigation reports, and any other evidence relied upon, such as interview notes or witness statements. All information included in the panel pack will be shared on a strictly need-to-know basis. Personal data relating to pupils, staff, or third parties will be redacted where required to protect confidentiality and comply with data protection legislation.

Where the complainant is invited to attend the Stage 2 panel hearing, a copy of the panel pack will be shared with them in advance, subject to appropriate redaction. Where the complainant is not invited to attend, the panel pack will not be shared.

Outcome, records and minutes
The complainant and the school will be provided with a written outcome of the Stage 2 review, setting out the panel's conclusions and any recommendations. This decision concludes the trust's internal complaints procedure. Written notice of the decision will be sent to the complainant and the Headteacher or Executive Headteacher within three working days (school days).

The panel's findings and recommendations will be provided to the complainant and, where relevant, the person complained about. A copy will also be available for inspection on the school premises by the proprietor and the Headteacher or Executive Headteacher.

The Stage 2 panel meeting will be clerked, and a written record will be retained by the Trust or academy. A record of all correspondence, notes, and documentation relating to the complaint will be retained securely in the academy's complaints records and will not form part of any pupil's educational or personal file. Records will be held in accordance with the trust's data retention policy and data protection legislation.

Complainants may request a copy of the panel minutes following the Stage 2 hearing. Any decision to share minutes, in full or in part, will be at the discretion of the panel and will take account of data protection, confidentiality, and the rights of others. Where minutes are shared, they may be redacted as necessary. The written outcome of the panel will remain the definitive record of the decision. Minutes of the panel's deliberations remain confidential and are not normally disclosed.

Arrangements for the conduct and process of Stage 2 panel hearings are set out in Appendix 1.

Failure to appeal within the timescale

Where a complainant does not request escalation to the next stage within the timescales set out in this procedure, and no exceptional circumstances have been accepted by the Trust, the complaint will be regarded as concluded and closed. The Trust will not normally reopen the complaint or reconsider matters that have already been investigated under this procedure.

Exceptional circumstances

Nothing in this procedure prevents the Trust from taking proportionate steps to manage a complaint where exceptional circumstances arise which make it impossible, unlawful, unsafe or manifestly inappropriate to continue the procedure in the usual way.

This may include circumstances where the subject matter falls outside the scope of this procedure; substantially the same complaint has already completed the Trust's complaints procedure; the complainant has withdrawn the complaint; the matter is subject to another statutory or legal process which prevents or requires the suspension of consideration; or the complainant's conduct makes it impossible to operate the procedure safely or fairly despite reasonable steps having been taken to manage that conduct.

Exceptionally, this may result in the procedure being suspended, modified or concluded without progressing to a further stage. Such a decision will not be taken simply because the Trust considers the complaint unlikely to succeed, disagrees with the complainant, or considers that a panel would be unlikely to reach a different conclusion.

Any decision to depart from or conclude the procedure in this way will be taken by the CEO or, where appropriate, the Chair of Trustees. The reasons will be recorded and communicated to the complainant in writing.

Access, support, and participation

Third Parties

Complainants may request that a complaint is submitted by, or discussed with, a third party acting on their behalf. Where this is the case, the trust will require the complainant's explicit consent before sharing information or engaging in discussion with the third party. Third parties act to support the complainant and do not replace the complainant's responsibility for engaging with the complaints process. Consent will be recorded, and information will only be shared where it is necessary and proportionate to the handling of the complaint, in accordance with data protection legislation. Further information about how personal data is processed is set out in the trust's Privacy Notice.

Anonymous Complaints

While the trust does not normally investigate anonymous complaints, safeguarding or whistleblowing concerns raised anonymously will be reviewed and, where credible, may still be acted upon. In addition, the headteacher or CEO, if appropriate, will determine whether other anonymous complaints warrant investigation.

Reasonable adjustments and accessibility

In line with equality law, the trust will consider reasonable adjustments where required to enable complainants to access and engage with this complaints procedure. This may include providing information in alternative formats, assisting complainants to articulate their complaint, or holding meetings in accessible locations or formats. This may also include support for complainants with communication needs, including language or literacy support, where required. On request, this procedure and any associated documents will be made available in alternative formats. Complainants are entitled to be accompanied at any panel hearing (if invited) or meeting arranged under this procedure, should they wish, to support full and effective participation in the process.

Managing complexity and proportionality

Time scales

Complainants should 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.

Scope of the Complaints Policy

This policy covers all complaints about Waterton schools or pre-schools, with the exception of those listed below. School office teams can direct stakeholders to appropriate contacts if their complaint concerns any of the below:

- Admissions: Complaints about admissions are managed under the School Admissions Code and should be directed to the relevant admissions authority.
- SEND statutory assessment: Concerns about statutory assessment of SEND should be directed to the local authority in line with the SEND Code of Practice.
- Exclusions: Complaints about suspensions and permanent exclusions are considered under the statutory guidance Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England.
- Whistleblowing: Concerns about malpractice, wrongdoing, or risk should be raised under the trust's Whistleblowing Policy.
- Staff grievances and disciplinary matters, including school re-organisation and restructures: Complaints or concerns raised by staff in relation to their employment should be addressed under the trust's Grievance or Disciplinary Policy as appropriate.
- Complaints about services provided by external users of school facilities fall outside this procedure and should be directed to the provider.
- Concerns about the content of the national curriculum are not covered by this policy and should be raised directly with the Department for Education.
- Complaints relating to the fulfilment of the Early Years Foundation Stage requirements will be investigated and the complainant notified of the outcome within 28 calendar days of receipt. A written record of the complaint and its outcome will be retained and made available to Ofsted on request. Parents and carers may contact Ofsted where they believe an early years provider is not meeting the EYFS requirements.

Where a complaint includes elements that fall both within and outside the scope of this policy, the trust will consider the elements within its remit under this procedure and signpost the remainder appropriately.

Clarifying the Complaint

Where a complaint contains extensive, repetitive or duplicated material, or includes broad allegations without sufficient factual detail to enable a fair and proportionate investigation, the Trust may ask the complainant to provide a concise summary identifying:

- the specific complaint(s)
- the relevant dates (where known)
- the factual basis of each complaint
- the outcome sought.

Where clarification is requested, the Trust will normally investigate the clearly identified matters that fall within the scope of this procedure. The Trust is not required to investigate vague, speculative, repetitive or unparticularised allegations where insufficient information has been provided to enable a fair investigation.

The Trust is not required to respond individually to every assertion, allegation, legal argument, reference to legislation or statutory guidance, or commentary contained within a complaint. Responses will address the substantive issues necessary to determine whether the complaint is upheld, partially upheld, or not upheld, together with any actions arising from that decision.

Other investigations and Legal Action

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 a school within the trust 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.

Concluding the Complaints Procedure

A complaint will not normally be concluded before the complainant has had the opportunity to access the stages of this procedure that are applicable under its terms. Where a complainant remains dissatisfied following Stage 1b and requests Stage 2 within the published timescale, the Trust will make arrangements for the complaint to be considered at Stage 2, subject to the scope and other provisions of this procedure.

Nothing in this policy prevents the Trust from:

- declining to reconsider matters that have already completed the complaints procedure;
- managing unreasonable behaviour or unreasonable contact;
- declining to investigate allegations that remain vague, speculative, repetitive or outside the scope of this policy despite reasonable attempts to clarify them;
- suspending consideration where another statutory or legal process makes this necessary or appropriate; or
- taking proportionate steps where exceptional circumstances make it impossible, unlawful, unsafe or manifestly inappropriate to continue the procedure in the usual way.

In exceptional circumstances, this may result in the procedure being modified, suspended or concluded without progressing to a further stage. This will only occur where there are compelling reasons for doing so and will not be based solely on the Trust's view that the complaint is unlikely to succeed, disagreement with the complainant, or a view that a panel would be unlikely to reach a different conclusion.

Any decision to depart from or conclude the procedure in this way will be taken by the CEO or Deputy CEO, or by the Chair of Trustees where appropriate to the subject matter of the complaint. The reasons for the decision will be recorded and communicated to the complainant in writing.

Complaints Campaigns

There can be occasions where the Trust or any school or pre-school within the Trust receives large volumes of complaints from multiple sources. In these cases, we reserve our right to treat this as a complaints campaign and as such we may choose to manage these

complaints as a whole and produce a single statement which is shared with all complainants. Although the subject matter of the complaint will be taken seriously and fully investigated, the issue will not be investigated repeatedly without good reason.

In the event of a complaint which is identified as a part of a series of near identical complaints, the following process will be followed:

- The complainant begins the complaints process as usual.
- School or trust staff identify that this complaint is one of many very similar complaints.
- A single letter of response is prepared.
- This letter of response is shared with each complainant.

Where complaints are managed collectively as part of a complaints campaign, this does not remove an individual complainant's right to request escalation in line with this procedure. Each complainant will retain access to the next stage of the complaints process should they remain dissatisfied with the outcome.

Where a high volume of near-identical complaints results in multiple requests for escalation, the trust reserves the discretion to manage the appeal stage proportionately. This may include identifying one or more representative complaints to be considered in depth, while ensuring that the views and evidence of all complainants are taken into account and that outcomes are applied consistently.

Persistent or Vexatious Campaigns

Waterton Academy Trust is committed to handling complaints fairly and proportionately. In a small number of cases, complaints may become vexatious or persistent, for example where issues have been fully investigated, outcomes are repeatedly challenged, communication is excessive, or behaviour is unreasonable or disruptive. In such circumstances, the trust may set clear boundaries on contact, limit communication, or decline to respond to matters already addressed. Any action taken will be proportionate, reviewed regularly, and communicated clearly, ensuring the Trust meets its legal obligations while protecting staff and maintaining effective practice.

Outcomes and learning

Resolving complaints

At each stage in the procedure, our aim will always be to resolve a complaint to the satisfaction of all parties. 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 reoccur.
- An undertaking to review policies in light of the complaint.
- An apology.
- 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.

Withdrawal of a Complaint

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

Records, oversight, and organisational learning

The trust will keep a written record of all complaints received, including the nature of the complaint, the stage reached (including whether the complaint was resolved following the formal procedure or proceeded to a panel hearing), actions taken regardless of whether the complaint was upheld, and the outcome.

Complaint records, including correspondence and statements relating to individual complaints, will be treated confidentially, except where access is requested by the Secretary of State for Education or an inspection body exercising its statutory functions.
Access to complaint records will be restricted to those with a legitimate role in managing, reviewing, or assuring the complaints process. Personal data will be processed lawfully, fairly, and transparently, and only where necessary for the purposes of handling complaints and meeting statutory obligations.

Anonymised and aggregated information arising from complaints will be reviewed periodically by the Executive Leadership Team and, where appropriate, trustees, to provide assurance, identify themes or systemic issues, and inform improvements to policy, practice, training, or systems. Individual cases will not be discussed beyond those directly involved in the handling or governance oversight of the complaint.

Next Steps

If the complainant believes the trust did not handle their complaint in line with the published procedure or acted unlawfully or unreasonably in the exercise of its duties under education law, they may refer the matter to the Department for Education (DfE)[1]

The DfE will not normally reinvestigate the substance of a complaint or overturn any decisions made by the trust. Its role is to consider whether the trust has complied with education legislation and any statutory policies relevant to the complaint.

Complaints to the DfE can be made online through the DfE complaints service or by writing to: Department for Education, School complaints compliance unit, Piccadilly Gate, Store Street, Manchester, M1 2WD.

[1] https://www.gov.uk/government/publications/complain-about-an-academy/complain-about-an-academy

Appendix 1 – Appeal Panels

The appeal panel operates according to the following formal procedures:

1. **Opening of the hearing**
   The Chair opens the meeting, introduces panel members and the clerk, confirms the purpose of the hearing, and outlines how the meeting will be conducted. The Chair confirms who is present, notes any absences, and confirms that the panel will proceed based on the available written and oral evidence (if provided).
2. **Confirmation of scope**
   The Chair confirms the specific matters under review, based on the complainant's Stage 2 submission, and clarifies that the panel will consider only those matters within scope.
3. **Summary of the complaint**
   The complaint investigator provides a concise summary of the complaint, the actions taken at earlier stages set out in a chronology, and the outcome reached. Where the investigator is not in attendance, the Chair or clerk summarises the written submission.
4. **Consideration of the complainant's representations**
   Where the complainant is in attendance, they are invited to present their representations, focusing on the unresolved aspects of the complaint and the outcome they are seeking. Where the complainant is not in attendance, the panel will consider their written submission in full.
5. **Questions to clarify the complainant's case**
   Panel members may ask questions through the Chair to clarify points of fact or process. Where the complainant is not present, questions will be considered in light of the written evidence provided.
6. **School or trust response**
   Where present, the school representative or investigating officer responds to the issues raised, setting out the rationale for decisions taken and how the procedure was followed. Where not present, the panel will consider the written response provided.
7. **Questions to clarify the school or trust response**
   Panel members may ask questions through the Chair to clarify evidence, decision-making, or process. Where parties are not present, clarification will be sought from the written record.
8. **Closing statements**
   Where in attendance, the complainant is invited to make a brief closing statement, followed by a closing statement from the school or investigating officer. Where parties are not present, the panel will proceed to deliberation based on the written submissions.
9. **Withdrawal of parties**
   All attendees other than the panel members and the clerk withdraw from the meeting, where applicable.
10. **Panel deliberation**
    The panel considers all written submissions, any oral representations, and the evidence presented, and reaches a decision by unanimous or majority agreement.
11. **Recording and notification of outcome**
    The clerk records the panel's decision and rationale. The complainant and the school are notified of the outcome in writing within the timescale set out in the policy.

Appendix 2 – Complaints Flowchart

Informal Stage

Concern raised informally

With the class teacher	With the Headteacher or Head of School	With the trust (if the concern is about the Headteacher, Executive Headteacher or about a member of central trust staff)
If the concern remains unresolved, the concern should be raised with the Headteacher or Head of School		
Contact your child's teacher through the school office to arrange a conversation or a meeting	*Contact the Headteacher of Head of School through the school office to arrange a meeting*	Make contact through the Trust admin office 01924 240767 admin@watertonacademytrust.org

Contact the Headteacher

Go to Stage 1a

Go to Stage 1

Stage 1: Formal Stage

If the concern has not been resolved satisfactorily at the informal stage, or the complaint is deemed to be a serious complaint by the HT/CEO

Stage 1a: Formal investigation commissioned by the Headteacher or Executive Headteacher and outcome reported to the complainant	**Stage 1b:** Formal investigation commissioned by the CEO/Deputy CEO and outcome reported to the complainant This applies where (a) the complainant is not satisfied with the outcome of an informal concern raised with the trust about the Headteacher/ Executive Headteacher or (b) the complainant is not satisfied with the outcome of a stage 1a formal investigation undertaken by the Headteacher/ Executive Headteacher)	**Stage 1b:** Formal investigation commissioned by the Chair of Trustees and outcome reported to the complainant Where the complaint is about the CEO.
Make contact through the school office	Make contact through the Trust admin office admin@watertonacademytrust.org 01924 240767	Make contact through the Trust admin office admin@watertonacademytrust.org 01924 240767

Contact the Trust

Stage 2: Appeal Panel

Independent panel of at least three people reviews whether the complaint was handled fairly, proportionately, and in line with the complaints procedure, and whether the decision reached was reasonable. This is the final stage of the trust's complaints process. If dissatisfied after Stage 2, the complainant may contact the Department for Education.

Document Detail	
Document Name:	Complaints Policy and Procedure
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Version Control

Version	Date	Author	Change /Reference
8	01/04/2026	M Bretherton	Policy fully restructured for clarity and usability, with clearer staging, headings, and flow aligned to DfE model complaints procedures. **Stage 1b clarified and strengthened**: – Confirmed that Stage 1b is not a reinvestigation by default where Stage 1a has already taken place. – Defined Stage 1b purpose as procedural assurance and proportionality review, with reinvestigation only where justified. – Confirmed that where a complaint enters directly at Stage 1b (e.g. complaints about Headteacher or senior trust staff), Stage 1b constitutes a full investigation. **Stage 2 (Appeal Panel) significantly strengthened**: – Purpose clarified as independent review of fairness, proportionality, procedural compliance, and reasonableness of outcome. – Attendance made discretionary rather than automatic, with clear fairness safeguards where parties are or are not present. – Panel composition clarified, including independence requirements and confirmation that panel members receive appropriate training. – Clear expectations added for complainants when requesting Stage 2, including scope, unresolved issues, and desired outcomes. **Expectations of complainants added**: – Clear behavioural expectations introduced, including respectful communication, single-point contact, avoidance of repeated relitigating, and non-use of social media.

			– Explicit link made to the Trust's Parents Code of Conduct. - Addition in relation to persistent or vexatious complaints **Pupil involvement clarified**: – Confirmed that pupils may be spoken to without parental consent where necessary to avoid delay, compromise, or prejudice, with safeguards clearly stated. **Accessibility and equality provisions enhanced**: – Reasonable adjustments strengthened, including communication support, alternative formats, and discretionary support arrangements at hearings. **Appendices strengthened**: – Stage 2 panel procedure rewritten as a neutral, attendance-independent agenda. – Flowchart updated to reflect revised escalation logic and roles.