The Hawksmoor Learning Trust

("the Trust")

Complaints Policy

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Key

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1	Statutory publication	A	Statutory publication
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4	Not required	D	Not required

** Policy level:

1. Trust wide: this one policy is relevant to everyone and consistently applied across all schools and Trust departments with no variations. Approved by the THLT Board of Trustees.

2. Trust core values: this policy defines the values to be incorporated fully in all other policies on this subject across all schools and Trust departments. It forms the basis of a localised school or department policy that also contains relevant information, procedures and processes contextualised to that school or department. Approved by the THLT Board of Trustees as a Trust Core Values policy, and by school or department governance bodies as a contextualised policy.

School / department policies: defined independently by schools or departments as appropriate. Approved by school or department governance bodies.

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Introduction

1. The Hawksmoor Learning Trust (the "Trust") and its Schools:
   1.1. endeavour to provide the best education possible for all pupils in an open and transparent environment;
   1.2. welcome feedback from parents, pupils and third parties; and
   1.3. accept that, on occasion, individuals may feel dissatisfied with the service provided and will wish to express this.
2. Where concerns are raised, the Trust intends for these to be dealt with fairly, openly, promptly and without prejudice.
3. The time of our staff, and the public funding that pays for it, exists to educate and care for all of our pupils. The Trust will always listen to concerns and will respond in a way that is proportionate to the issue raised. This means that minor or routine matters will be dealt with quickly and informally by the right person, and the formal stages of this procedure will be used for matters that genuinely need them.
4. This policy explains how to raise a concern or make a complaint about the Trust and its Schools, how the Trust will respond, and how the Trust will manage complaints or contact that become unreasonable. It should be read alongside the Trust's Parent and Visitor Code of Conduct.

Definitions

Complaint	An expression of dissatisfaction, however made, about actions taken or a lack of action.
Concern	An expression of worry or doubt over an issue considered to be important for which reassurances are sought.
Routine enquiry	A request for information, a first report of an everyday issue (for example lost property, a missing reading book or a query about an event), or a request for a service. A routine enquiry is not a complaint.
Operational decision	A day-to-day decision about the organisation and running of a School that is delegated to the Headteacher (see paragraphs 30 to 33).
School	A school which is part of the Trust.
Headteacher	The Headteacher of a School.
LAB	The local board of a School within the Trust's governance structure.
Investigating Officer	A person properly appointed by a Headteacher, the CEO, the Chair of Trustees or the Vice-Chair to investigate a complaint.
School Day	A day when the School is open and pupils are attending.
Working Day	A weekday during term time when the School or Trust office is open. School holidays and bank holidays are not Working Days.
School office email	The published general email address of each School, which is monitored by the School office.
Trust	The Hawksmoor Learning Trust.
Unreasonable complainant	A person who, because of the frequency or nature of their contact with the Trust or a School, hinders the consideration of their own or other people's complaints, or whose behaviour is unacceptable under the Parent and Visitor Code of Conduct.
Unreasonable complaint	A complaint which, by its frequency, nature or persistence, hinders the consideration of the complainant's or other people's complaints, and/or may reasonably be considered vexatious or trivial.

Policy scope

5. This policy and procedure covers all concerns and complaints relating to volunteers, Schools, School staff, School governors and LAB members, the Trust, Trust staff and trustees.
6. This policy does not apply to the following, which are dealt with under separate policies and procedures:
    6.1. **Admissions.** These are handled through the admissions appeals process or the Local Authority.
    6.2. **Matters likely to require a child protection investigation.** These are handled under the Child Protection and Safeguarding Policy and relevant statutory guidance. Serious concerns can also be directed to the Local Authority Designated Officer (LADO) or the Multi-Agency Safeguarding Hub (MASH).
    6.3. **Suspensions and permanent exclusions.** Information is available at www.gov.uk/school-discipline-exclusions/exclusions. Complaints about the application of the behaviour policy can be made through this procedure.
    6.4. **Whistleblowing.** This is covered by the Trust's Whistleblowing Policy. The Secretary of State for Education is the prescribed person for whistleblowers in education who do not want to raise matters directly with their employer (www.education.gov.uk/contactus). Volunteers who have concerns should use this procedure.
    6.5. **Staff grievances.** These are dealt with under the Trust's Grievance Procedure.
    6.6. **Staff conduct.** This is dealt with under the Trust's Disciplinary and Capability policies where appropriate. Complainants will not be told of any disciplinary action taken against a member of staff as a result of a complaint, but will be told that the matter is being addressed.
    6.7. **Withdrawal from the curriculum.** Parents and carers can withdraw their child from Religious Education (RE) and the Daily Act of Collective Worship without giving a reason. If they are not satisfied with how a request to withdraw was handled, they may use this procedure. The right of withdrawal does not apply where religious matters arise spontaneously or in other subjects such as History or Citizenship.
    6.8. **Services provided by third parties** who use School premises or facilities. These organisations have their own complaints procedures and should be contacted directly.
7. **Other bodies.** Where other agencies, for example the police, local authority safeguarding teams or tribunals, are investigating aspects of a complaint, the Trust may not be able to keep to the timescales in this policy, or may suspend the procedure until those investigations are complete. The complainant will be told of a revised timescale.
8. **Legal action.** If a complainant starts legal action against a School or the Trust in relation to a complaint, the Trust will consider whether to suspend the complaints procedure until those proceedings have concluded.

Who can make a complaint?

9. This procedure is not limited to parents or carers of pupils at the Schools. Any person, including members of the public, may make a complaint about any provision of facilities or services that the Trust or its Schools provide.
10. Unless a complaint is dealt with under a separate statutory procedure, such as admissions or exclusion appeals, the Trust will use this procedure.

Initial resolution

11. It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Most issues can be resolved quickly and informally by speaking to the class teacher, without using the formal stages of this procedure.

12. A routine enquiry is not a complaint and will be dealt with as part of the School's normal business. It will only be treated as a concern or complaint if it is not resolved and the person asks for it to be taken further.
13. The Trust and its Schools take concerns seriously and will make every effort to resolve them as quickly as possible.
14. If a complainant is finding it difficult to discuss a concern with a particular member of staff, the Headteacher will ask another member of staff to deal with it. The same applies if the member of staff directly involved feels unable to deal with the concern. That member of staff may be more senior but does not have to be; the ability to consider the concern objectively and impartially is more important.

Communicating with the school or Trust

15. To make sure every message is logged, reaches the right person and receives a timely reply, parents and carers should always use the School office email for written communication with a School. Staff personal or individual email addresses, social media, messaging apps and personal phone numbers should not be used to contact staff.
16. The School or Trust will acknowledge emails as soon as it is able to, and within three Working Days for non-urgent matters. A full reply may take longer where information needs to be gathered or the right member of staff is teaching. Emails received during school holidays will be treated as received on the first Working Day of the new term.
17. Urgent matters, including anything that affects a child's safety or welfare on the day, should be raised by telephoning the School office. Any safeguarding concern should be raised immediately by telephone, asking for the Designated Safeguarding Lead.
18. Staff are not expected to read or reply to emails outside their working hours, at weekends or during school holidays.
19. At the start and end of the school day, teachers are responsible for the safety of the pupils in their care. Brief messages can be passed on at these times, but any matter that needs discussion should be arranged as an appointment through the School office.
20. Please keep correspondence about a single matter in one email thread, and avoid sending repeated messages about the same issue while it is being dealt with. Repeated messages do not speed up a response and can delay it.

How to raise a concern or make a complaint

21. A concern or complaint can be made in person, in writing (by letter or through the School office email) or by telephone. A concern or complaint may also be made by a third party acting on behalf of a complainant, provided appropriate consent is in place.
22. A concern / complaint form is included at Annex A. Anyone who needs help completing the form should contact the School or Trust office.
23. In line with the Equality Act 2010, the Trust will consider making reasonable adjustments where needed to help a complainant access and complete this procedure, for example helping them put a complaint in writing or holding meetings in accessible locations.

Concerns or complaints about a School

24. A concern should first be raised with the class teacher (or equivalent) through the School office email or by arranging an appointment through the School office.
25. If the concern is not resolved, the next step is a formal complaint. This should be sent to the Headteacher through the School office email, or by letter to the School office marked 'private and confidential'.
26. Complainants should not approach individual governors, LAB members or trustees to raise concerns or complaints. They have no power to act on an individual basis, and doing so may prevent them from considering the complaint at a later stage.

27. Contacting the CEO, Trust central staff or trustees directly does not bypass the stages of this procedure. A concern or complaint about a School that is sent to the Trust will be passed back to the School and dealt with at the correct stage. The complainant will be told this has happened.

Concerns or complaints about a Headteacher, LAB, governors, the Trust or Trust staff

28. A concern or complaint about a Headteacher, the Chair of a LAB, governors or the LAB in general, the Trust or Trust staff should be sent to the Trust office for the attention of the CEO, marked 'private and confidential', or by email to PA@THLT.Academy.

Concerns or complaints about the CEO

29. Concerns or complaints about the CEO should be sent by email to the Chair of the Trust at ChairofTrust@THLT.Academy.

Operational decisions

30. The Board of Trustees delegates the day-to-day organisation and running of each School to its Headteacher. Operational decisions include, for example, class organisation and placement, staffing and timetabling, uniform and PE kit, routines, the arrangements for drop-off and collection, trips and events, and how School policies are applied day to day.
31. Disagreeing with an operational decision that has been properly made is not, in itself, grounds for a complaint. The School will explain the reasons for a decision when asked.
32. Where a complaint about an operational decision is taken through the formal stages, the Investigating Officer or Complaints Appeal Panel will review the grounds on which the decision was made and whether it was made fairly and reasonably, taking account of the relevant information, the needs of the pupils involved and any applicable policy. They will not substitute their own judgement for that of the Headteacher or re-make the decision.
33. Where a complaint is upheld, the usual remedy will be for the decision to be reconsidered properly by the Headteacher.

Anonymous complaints

34. Anonymous complaints will not normally be investigated, as the School or Trust is unable to respond to the complainant.
35. Exceptional circumstances include serious concerns such as child protection issues, where the School or Trust may need to involve external agencies, or may carry out its own internal review to test whether there is evidence which should trigger a formal investigation.
36. Whistleblowing will be investigated under the Trust's Whistleblowing Policy. Examples include a criminal offence, fraud, danger to health and safety, damage to the environment, a miscarriage of justice, the School or Trust breaking the law, or covering up wrongdoing.

Timescales

37. A complaint must be raised within three months of the incident or, where there has been a series of associated incidents, within three months of the last of these.
38. The School or Trust will only consider complaints made outside this time frame if exceptional circumstances apply.

Complaints received outside the school term

39. Complaints made outside term time will be treated as received on the first School Day after the holiday period.

Resolving complaints

40. At each stage, the School and Trust want to resolve the complaint. Where appropriate, the School or Trust will acknowledge that the complaint is upheld in whole or in part.

41. The School or Trust may also offer one or more of the following:
    41.1. an explanation;
    41.2. an acknowledgement that the situation could have been handled differently or better;
    41.3. an assurance that the School or Trust will try to ensure the event does not recur, with an explanation of the steps taken or to be taken and the timescale for any changes;
    41.4. an undertaking to review policies in light of the complaint;
    41.5. an apology.

Withdrawal of a complaint

42. If a complainant wishes to withdraw a complaint, the School or Trust will ask for confirmation in writing.

Social media

43. For complaints to be resolved as quickly and fairly as possible, complainants are asked not to discuss complaints publicly, including on social media and in parent messaging groups.
44. Complaints will be handled discreetly for all those involved, and the School or Trust expects complainants to show the same discretion. Posting abusive, harassing or untrue content about staff, pupils or other parents is a breach of the Parent and Visitor Code of Conduct and may be treated as unreasonable behaviour under Annex B.

Recording of conversations and meetings

45. Conversations and meetings with staff may only be recorded with the prior knowledge and consent of everyone present. Consent will be noted in any minutes. Where a complainant's disability or special educational needs make a recording necessary, this will be arranged as a reasonable adjustment.
46. Recordings must not be shared or used in ways that cause harm, distress or intimidation. Recordings made covertly, without the consent of all parties, will not normally be accepted as evidence.

Duplicate complaints and complaint campaigns

47. If, after a complaint has completed the procedure, a duplicate complaint is received from someone connected to the original complainant (for example a partner, grandparent or other relative), the new complainant will be told that the complaint has already been considered and the local process is complete. They will be advised to contact the Department for Education (DfE) if they are dissatisfied with how the original complaint was handled.
48. If the School or Trust receives a large number of complaints on the same subject, and/or from people unconnected with the School or Trust, it may send a template response to all complainants and/or publish a single response on the appropriate website. Such responses will advise complainants to contact the DfE if they are dissatisfied with how their complaint was handled.

Serial, persistent and unreasonable complaints

49. The Trust is committed to dealing with all complaints fairly and impartially. It will not normally limit the contact a complainant has with a School or the Trust, and it will not stop responding simply because a complainant is persistent or difficult. However, the Trust has a duty to protect its staff and to make sure their time is spent on pupils' education and welfare.
50. **Serial or persistent complaints.** A complaint may be treated as serial or persistent if it relates to the same issue as a previous complaint from the same complainant (or someone acting with them) which has already completed the formal procedure and on which the complainant has been told the outcome. In these cases the complainant will be told in writing that the matter is closed and that no further response will be provided, unless there is significant new evidence.

51. **Unreasonable complaints.** A complaint may be treated as unreasonable if it:
    51.1. contains threatening, intimidating, abusive or offensive language;
    51.2. seeks outcomes that are unrealistic or that the School or Trust cannot lawfully provide;
    51.3. is vexatious or trivial in nature; or
    51.4. repeats, in different words, a matter that has already been decided.
52. In these cases the Headteacher or CEO will consult relevant colleagues and may decide that the complaint will not be considered under this procedure. The complainant will be told this in writing, with reasons.
53. **Unreasonable behaviour.** Separately from the complaint itself, the Trust may act on the behaviour of a complainant where it is unreasonable, for example excessive contact, intimidation or abuse of staff. This may include putting in place a communication plan that sets out how, how often and with whom the person may communicate.
54. Before any restriction is applied, the Trust will consider whether a disability or other need may be affecting the person's behaviour and whether reasonable adjustments are needed. Any decision will be made by the Headteacher or CEO, confirmed in writing with reasons, and reviewed. The procedure is set out in Annex B, with a template letter at Annex K.
55. Any restriction on contact will never prevent the School from receiving a safeguarding concern, a genuinely new concern or complaint, or from sharing the ordinary information parents receive about their child's education.

Record keeping and retention

56. The relevant School will keep a written record of all concerns and complaints that reach the formal stages, whether they are resolved at Stage 2 or proceed to a panel hearing, and of any action taken as a result, whether or not the complaint is upheld.
57. The Headteacher (or the CEO where appropriate) is responsible for making sure formal complaints are recorded consistently and accurately.
58. Schools will also log incidents of unreasonable behaviour and any communication plans, so that patterns can be monitored and reported to the LAB and Board of Trustees.
59. **Confidentiality.**
    59.1. All complaints will be treated as confidential.
    59.2. Only staff, governors or trustees involved in dealing with the complaint will have access to documents relating to it.
    59.3. No confidential information about an investigation will be made public.
    59.4. Staff who are the subject of a complaint will be told about the complaint.
    59.5. Information will be held securely and handled in line with the UK General Data Protection Regulation and the Data Protection Act 2018.
    59.6. Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education and Skills Act 2008 requests access to them.

Complaints procedure

Stage 1: Informal concerns and complaints

60. Parents, carers, pupils and others will have concerns from time to time. The Trust encourages people to raise these with the relevant member of staff so that they can be resolved in partnership. For parents and carers this will normally be the class teacher. For others it will normally be the Headteacher.
61. Concerns should be raised through the School office email or at an appointment arranged through the School office.
62. The School will aim to resolve Stage 1 concerns within 10 School Days.

63. Where a concern cannot be resolved informally, the complainant may make a formal complaint at Stage 2.

Stage 2: Formal complaints about a School or School staff

64. Formal complaints must be made to the Headteacher, preferably in writing using the form at Annex A and sent through the School office email. Complaints about the Headteacher should be made to the CEO (see paragraph 28).
65. If the complaint is made in person, the person receiving it should make written notes and, if possible, ask the complainant to countersign them.
66. The complaint will be acknowledged within 5 School Days of receipt of the written formal complaint.
67. The Headteacher will investigate the complaint and make every effort to resolve it, and may arrange a meeting to clarify the details. The Headteacher may delegate the investigation to another senior leader but remains responsible for the decision and response.
68. Within 15 School Days of receiving the written formal complaint, the Headteacher will write to the complainant with the outcome. The response will set out the actions taken to investigate, the reasons for the decision and, where appropriate, any actions to resolve the complaint. It will also explain how to escalate the complaint if the complainant remains dissatisfied.
69. If the investigation cannot be completed within 15 School Days, the Headteacher will write to the complainant explaining the delay and confirming when the response can be expected.
70. Where a formal complaint concerns the Headteacher or a governor, it will be referred to the CEO, who will arrange an appropriate investigation at Stage 2.

Stage 2: Formal complaints about the Trust central team

71. Formal complaints about the work of the Trust central team should be sent to the CEO by email to PA@THLT.Academy, preferably using the form at Annex A.
72. If the complaint is made in person, written notes should be made and, if possible, countersigned by the complainant.
73. The CEO will appoint an appropriate Investigating Officer. Where a complaint concerns the CEO or a trustee, it will be referred to the Chair of the Trust. Where it concerns the Chair of the Trust, the Vice-Chair will arrange the investigation.
74. The complaint will be acknowledged within 5 School Days of receipt of the written formal complaint.
75. The Investigating Officer will investigate and make every effort to resolve the complaint, and may arrange a meeting to clarify the details.
76. Within 15 School Days of receiving the written formal complaint, the Investigating Officer will write to the complainant with the outcome, the actions taken to investigate, the reasons for the decision and any actions to resolve the complaint, and will explain how to escalate the complaint.
77. If the investigation cannot be completed within 15 School Days, the Investigating Officer will write to the complainant explaining the delay and confirming when the response can be expected.

Stage 3: Complaints Appeal Panel

78. If the complainant is dissatisfied with the outcome at Stage 2, they may ask for the complaint to be heard by a Complaints Appeal Panel (the Panel). This is the final stage of the Trust's procedure.
79. A request to escalate to Stage 3 must be made to the CEO (or to the Chair of the Trust if the complaint concerns the CEO) within 10 School Days of receiving the Stage 2 response. Requests received after this will only be considered in exceptional circumstances.
80. The CEO (or Chair of the Trust) will acknowledge the request in writing within 5 School Days and ask the complainant for the reasons for the appeal and any relevant supporting evidence.
81. Once this is received, the CEO will ask the Clerk to the Trust (the Clerk) to convene the Panel. The Clerk will write to the complainant with the date of the meeting, and will aim to hold it within 20 School Days of receipt of the Stage 3 request. If this is not possible, the Clerk will give an anticipated date and keep the complainant updated.

82. If the complainant rejects three proposed dates without good reason, the Clerk will decide when the meeting will be held. The Panel may then proceed in the complainant's absence on the basis of written submissions from both parties.

83. The complainant may bring a relative or friend for support. Neither side may bring legal representatives. Representatives of the media may not attend.

Membership of the Complaints Appeal Panel

84. The Panel will be made up of three people with no prior involvement in the complaint.

85. For a complaint about a School, two members will be drawn from that School's LAB or, where this is not possible, another LAB in the Trust. The third member will be independent of the management and running of that School and will be drawn from another LAB (or equivalent) either within or outside the Trust.

86. For a complaint about the Trust, two members will be drawn from the Board of Trustees and the third will be independent.

87. For a complaint about the Board of Trustees (the Chair, Vice-Chair, another trustee or the Board as a whole), the Panel will be entirely independent.

Remit and operation of the Complaints Appeal Panel

88. The Panel will consider the complaint afresh with the aim of resolving it and achieving reconciliation between the School or Trust and the complainant. For complaints about operational decisions, paragraphs 32 and 33 apply.

89. The Panel will not consider new complaints or evidence unrelated to the original complaint. New complaints must start at Stage 1.

90. The meeting will be held in private and professionally clerked. Written material will be circulated to all parties by the Clerk at least 5 School Days before the meeting.

91. Recordings are subject to paragraphs 45 and 46.

Decision of the Complaints Appeal Panel

92. After considering all the facts it considers relevant, the Panel may uphold or dismiss the complaint in whole or in part.

93. If the complaint is upheld in whole or in part, the Panel will decide on the appropriate action to resolve it and, where appropriate, recommend changes to the School's or Trust's systems or procedures.

94. The complainant will be told the Panel's decision in writing, usually within 5 School Days. The letter will set out the Panel's findings and recommendations, confirm that this is the final stage of the procedure, enclose a copy of the minutes, and explain how to contact the DfE.

Next steps

95. After Stage 3, a complainant may contact the DfE if they believe the School or Trust did not handle the complaint in line with this published procedure, or acted unlawfully or unreasonably in carrying out its duties under education law.

96. The DfE will not normally reinvestigate the substance of a complaint or overturn a decision made by the School or Trust. It will consider whether the School or Trust followed education legislation, any statutory policies connected with the complaint, and Part 7 of the Education (Independent School Standards) Regulations 2014.

97. Complaints can be made to the DfE online at www.gov.uk/complain-to-dfe, or by writing to: Ministerial and Public Communication Division, Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD.

Policy status and review

98. This policy does not form part of any employee's contract of employment.

99. The CEO will report to the Board of Trustees each year on the number and nature of complaints, their outcomes, and any communication plans or site restrictions in place, so that trends can be monitored.

Linked policies

- Parent and Visitor Code of Conduct
- Child Protection and Safeguarding Policy
- Behaviour Policy
- Whistleblowing Policy
- Grievance Procedure
- Disciplinary and Capability policies
- Data Protection Policy
- Freedom of Information Policy
- Admissions Policy
- Accessibility Plan and Equality Objectives

Summary of changes in version 3

Section	Change
Introduction	Added a statement on proportionate use of staff time and public funds, and cross-reference to the Parent and Visitor Code of Conduct.
Definitions	Added Routine enquiry, Operational decision, Working Day and School office email. “Head” updated to “Headteacher”.
Initial resolution	Routine enquiries confirmed as not complaints.
Communicating with the school or Trust (new)	School office email to be used for all written communication; acknowledgement as soon as able and within three Working Days for non-urgent matters; urgent and safeguarding routes; no expectation of replies outside working hours; appointments for discussions.
How to raise a concern	Contacting the CEO or trustees directly does not bypass the stages. Formal complaints sent through the School office email.
Operational decisions (new)	Confirms Headteacher delegation and that review is of how a decision was made, not re-making it.
Social media; Recording (new)	Aligned with the Code of Conduct and DfE guidance on bullying and harassment of school staff (July 2026).
Serial, persistent and unreasonable complaints	Strengthened: separates unreasonable complaints from unreasonable behaviour; adds communication plans, reasonable adjustments, written decisions and review.
Stage 1	Added a 10 School Day aim for resolving informal concerns.
Stage 2	Corrected referral of complaints about a Headteacher or governor to Stage 2 (previously “stage 1”).
Next steps	Updated DfE contact details following the closure of the ESFA.
Annex A	Return address aligned with the procedure and made role-based.
Annex B	Rewritten, including intimidating behaviour, a stepped response, communication plans and site access.

Section	Change
Annexes D to J	Terminology standardised to “Complaints Appeal Panel”; duplicate Annex F lettering corrected.
Annex K (new)	Template letter for unreasonable behaviour and communication plans.

Annex A. Concern / Complaint Form

CONFIDENTIAL WHEN COMPLETED

Your name:	
Pupil's name (if applicable):	
Your relationship to the pupil (if relevant):	
School name (if applicable):	
Address:	
Email:	
Telephone number:	

i) Please give details of your complaint (attach an additional sheet if needed).

Please be as specific as possible about the nature of the complaint. If you have more than one complaint, please set out each one separately. For each, give supporting information such as dates, times and the people involved, and list any correspondence at section iv.

ii) What action, if any, have you already taken to resolve your complaint informally? (Who did you speak to, when, and what was the response?)

iii) Why does this issue remain unresolved? What actions do you feel might resolve the problem at this stage?

iv) Are you attaching any paperwork, for example previous correspondence? If so, please give details:

Signature:		Date:	

Where to send this form

- **Complaints about a School or School staff:** to the Headteacher through the School office email, or by post or hand to the School office in a sealed envelope marked 'Private and confidential' for the attention of the Headteacher.
- **Complaints about a Headteacher, LAB, governors, the Trust or Trust staff:** to enquiries@THLT.Academy, or by post to the Trust office marked 'Private and confidential' for the attention of the CEO.
- **Complaints about the CEO:** to ChairofTrust@THLT.Academy.

Annex B. Managing Unreasonable Complaints and Unreasonable Behaviour

Principles

1. The Trust is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who complain. It will not normally limit the contact complainants have with a School or the Trust.
2. The Trust does not expect staff to tolerate unacceptable behaviour and will act to protect them from behaviour that is abusive, offensive, intimidating or threatening. This is in line with the Trust's duties as an employer and with the DfE's guidance on preventing and tackling the bullying and harassment of school staff (July 2026).
3. Staff time is there for the education and welfare of all pupils. Where the demands of a small number of individuals take a disproportionate amount of staff time, the Trust may manage that contact under this Annex.
4. Where a complainant raises an issue that has already completed this procedure, it will not be reinvestigated unless there is significant new evidence.

What may be treated as unreasonable

5. A complainant's complaint or behaviour may be regarded as unreasonable when they:
   - 5.1. refuse to explain their complaint, specify its grounds, or co-operate with the investigation while still wishing it to be resolved;
   - 5.2. refuse to accept that certain issues are not within the scope of this procedure, including properly made operational decisions;
   - 5.3. insist on the complaint being dealt with in ways that are incompatible with this procedure or with good practice;
   - 5.4. introduce trivial or irrelevant information and expect it to be considered and commented on;
   - 5.5. raise large numbers of detailed but unimportant questions and insist they are answered in full, often immediately and to their own timescale;
   - 5.6. make unjustified complaints about staff who are trying to deal with the issue, and seek to have them replaced;
   - 5.7. change the basis of the complaint as the investigation proceeds;
   - 5.8. repeatedly make the same complaint, despite previous investigations or responses concluding that it is groundless or has been addressed;
   - 5.9. refuse to accept the findings of an investigation after the procedure has been properly completed, including referral to the DfE;
   - 5.10. seek an unrealistic outcome;
   - 5.11. make excessive demands on School or Trust time through frequent, lengthy or complicated contact, in person, in writing, by email or by telephone, including contacting several members of staff, governors or trustees about the same matter;
   - 5.12. behave in a way that is intimidating, including standing over or blocking staff, raising their voice, following staff, making veiled or direct threats, or persistent contact designed to pressure staff into a decision;
   - 5.13. use abusive, offensive or discriminatory language, or violence;
   - 5.14. record staff without consent, including voice recordings of conversations, meetings or phone calls, or share recordings or images of staff to cause harm, distress or intimidation;
   - 5.15. knowingly provide false information; or
   - 5.16. publish or send unsubstantiated, prejudicial, inflammatory or untrue information about staff, pupils or the School, whether on social media, in parent messaging groups, or in messages or voice notes sent to others.

Before taking action

6. Before applying any restriction, the Headteacher or CEO will consider whether a disability, special educational need, language barrier or other circumstance may be affecting the person's behaviour, and whether reasonable adjustments would help. Adjustments may include a single named contact, meetings with a supporter present, or agreed times for contact.

7. Decisions will be based on recorded behaviour and applied consistently. Schools should keep a log of contact and incidents.

Stepped response

8. Wherever possible, the Trust will use the following steps, although it may move directly to a later step where behaviour is serious.

    8.1. **Step 1: Informal discussion.** The Headteacher or a senior member of staff will discuss the concerns with the person and explain what is expected under the Parent and Visitor Code of Conduct.

    8.2. **Step 2: Written warning.** If the behaviour continues, the Headteacher or CEO will write to the person explaining why their behaviour is unreasonable and asking them to change it.

    8.3. **Step 3: Communication plan.** If the behaviour continues, the Headteacher or CEO may put in place a communication plan using the template at Annex K.

    8.4. **Step 4: Conditions on, or withdrawal of, access to the School site.** See paragraphs 12 to 14.

Communication plans

9. A communication plan may include one or more of the following:

    9.1. all contact to be in writing through the School office email or a single named email address;

    9.2. a single named point of contact;

    9.3. limits on the number or frequency of contacts, for example one email a week except in an emergency;

    9.4. telephone contact only at set times, or no telephone contact;

    9.5. meetings only by appointment, with a second member of staff present and an agreed agenda;

    9.6. no direct contact with named members of staff;

    9.7. the School will not respond to further correspondence about a matter that has been concluded, but will read it to check for any new issue or safeguarding concern.

10. A communication plan will be confirmed in writing, with the reasons, the date it starts and the date it will be reviewed. Plans will normally be reviewed within one term. The person may ask for the decision to be reviewed by the CEO (or, if the CEO made the decision, by the Chair of the Trust or a trustee nominated by the Chair).

11. Before deciding to stop responding to a specific complaint, the School or Trust must be able to answer 'yes' to all of the following: have all reasonable steps been taken to address the complainant's concerns; has the complainant been given a clear statement of the School's or Trust's position and their options; and does the complainant keep contacting the School or Trust, making substantially the same points each time? The School or Trust will also consider whether the contact is often abusive or aggressive, includes insulting personal comments or threats towards staff, or appears intended to cause disruption or inconvenience.

Access to the School site

12. Parents have an implied permission to be on School premises for ordinary purposes. Where a person's conduct is aggressive, abusive, intimidating or disruptive, the Trust may place conditions on, or withdraw, that permission, in line with the DfE's guidance on controlling access to school premises and section 547 of the Education Act 1996.

13. The person will normally be told in writing of the proposed restriction and given the opportunity to make written representations before it is confirmed. In an emergency, a temporary restriction may be put in place immediately and then confirmed or withdrawn after representations are considered.
14. Any restriction will be reviewed within an agreed period, normally no longer than six months. Alternative arrangements will be made so that the pupil's attendance and education are not affected, for example handover at the School gate by a member of staff.

Serious incidents

15. Any serious incident of aggression, threat or violence will be recorded in writing immediately and reported to the police. The School may also consider the Protection from Harassment Act 1997 and the Malicious Communications Act 1988 where relevant. Staff affected will be supported by the Trust during and after the incident.

What will not be affected

16. No restriction under this Annex will prevent the School from receiving a safeguarding concern, a genuinely new concern or complaint, or from providing the ordinary information parents receive about their child, such as reports, parents' evening appointments and letters home.

Annex C. Investigating a Complaint

Introduction

1. The investigation of a complaint should always be carried out thoroughly, responsibly and in proportion to the issues raised. The outcome will matter to both the complainant and any member of staff complained about.
2. The investigation, including writing to the complainant with the outcome, will take place within 15 School Days of receipt of the written formal complaint. If this is not possible, the Investigating Officer will write to the complainant explaining the delay and confirming when the response can be expected.

Preparing for an investigation

3. It is essential to have a clear understanding of the complaint. Where necessary, the Investigating Officer should confirm the points of complaint with the complainant, for example through an initial meeting or telephone call, and agree them in writing.
4. Any member of staff complained about should be told that a complaint has been received and that the appropriate procedure will be followed. While it is usually not appropriate to share the detailed evidence until the investigation is complete, the member of staff must understand the nature of the allegations.
5. The Investigating Officer should then decide who to interview and what documents to review.

Conducting the investigation

6. Accurate notes should be taken of all interviews and the outcome of the investigation should be accurately recorded.
7. The complainant and any member of staff complained about should be able to offer documents and identify potential witnesses or sources of evidence.
8. Staff should be told they may be accompanied by a colleague or trade union representative when interviewed. It is not appropriate for anyone to be accompanied by a person giving legal advice or acting in a legal capacity.
9. Pupils should only be interviewed when the complaint is serious enough to warrant it and adult witnesses are not available. Younger pupils will only be interviewed in exceptional circumstances.
10. Interviews should take place as soon as possible, so that recollections are fresh and evidence is not affected by witnesses discussing events with others.
11. The Investigating Officer should prepare questions in advance, allow interviewees to answer in their own way without cutting them short or leading them, and give them the chance to add relevant information at the end. Responses should be confined to the substance of the complaint; speculative information, information about other staff, and unrelated issues should not be pursued.
12. The Investigating Officer should not reach conclusions until the investigation is complete.

Concluding the investigation

13. The Investigating Officer should produce a summary report (Annex F) setting out the complaint, the process followed, the findings linked to the evidence, any recommendations, and annexes of statements and other evidence.
14. The report will usually be confidential, as it is likely to contain sensitive personal information. Data protection and freedom of information legislation must be considered.
15. The outcome letter will include a brief summary of the complaint, the process followed, the outcome and the reasons for it (unless confidentiality would be compromised), any recommendations, and how to take the complaint to the next stage.

Annex D. Complaints Appeal Panel: Information for Panel Members

1. Before the meeting starts, the Panel will agree who will chair it. The Chair will follow the agenda at Annex J and the script at Annex E.
2. The Chair will welcome everyone, make introductions and explain the remit of the Panel, that its aim is to resolve the complaint and achieve reconciliation, that no new complaints will be heard (any new complaint will be referred to Stage 1), that each party will present their evidence, and that the Panel may ask questions.

Proceedings

3. The complainant will present first. The Investigating Officer and the Panel may ask questions.
4. The School or Trust will then present. The complainant and the Panel may ask questions.
5. The complainant will be asked what resolution they are seeking.
6. When the Panel is satisfied it has enough information, all parties other than the Panel and Clerk will leave so the Panel can reach its decision.
7. The Panel will decide, on the balance of probabilities, whether to uphold or not uphold the complaint in full or in part, and may make recommendations aimed at reconciliation or at improving procedures.
8. Where a complainant asks for an apology, the Panel may recommend one to the School or Trust; it cannot itself agree to provide one.
9. For complaints about operational decisions, the Panel will review the grounds on which the decision was made and whether it was made fairly and reasonably, taking account of the relevant information, the needs of the pupils involved and any applicable policy. It will not substitute its own judgement for that of the Headteacher (see paragraphs 30 to 33 of the policy).
10. The outcome will be confirmed in writing, copied to the School or Trust.

Points of note

11. Before the meeting, all parties should have received the complaints procedure, the original complaint, correspondence between the complainant and the School or Trust, and any written submissions.
12. The Panel is independent and impartial. No one may sit on the Panel if they have had prior involvement in the matters giving rise to the complaint or in earlier stages, or if they have detailed prior knowledge of it.
13. The complainant may not be satisfied if the Panel does not find wholly in their favour. It may only be possible to establish the facts and make recommendations that show the complaint has been taken seriously.
14. Panel members should ask open questions (for example, “What happened on that day?”) and check understanding (for example, “Are you saying that …?”).
15. Many complainants feel nervous in a formal setting, and parents may feel emotional when discussing their child. The Chair will make the meeting as welcoming as possible while keeping it procedurally fair to all parties, and the room should be arranged so it feels informal rather than adversarial.
16. Extra care is needed if a child is the complainant or a witness. The child should not feel intimidated, and their views should be given equal consideration. Where the parent is the complainant, they may suggest which parts of the meeting the child should attend, with the Chair retaining discretion.
17. The Panel will also expect all parties to behave respectfully. If any person behaves in an abusive or intimidating way, the Chair may adjourn the meeting and it may then continue on the basis of written submissions.

What solutions might be offered?

18. Common solutions include an apology (for example, where there was a delay in communicating with a parent after an incident), a change to policies or procedures, or staff training.

19. Financial remedies are not usually appropriate for school complaints. An example of where one might be is the cost of replacing uniform that was damaged.

Annex E. Complaints Appeal Panel: Chair's Script

Introductions

1. Welcome. My name is [name] and I am the Chair of this Complaints Appeal Panel. The Panel is made up of [two members from the LAB / Board of Trustees] and [name], who is independent of the running of this School / the Trust.
2. [Name] is clerking this meeting.
3. I will ask each person to introduce themselves: the complainant(s); anyone supporting the complainant; the Headteacher / Investigating Officer; the Panel members.

Independence

4. The Panel will reach its decision based on the information presented today, both written and spoken, and will not be influenced by anyone else.
5. The Clerk is here only to advise on procedure and will not influence our decision.

Procedure

6. You should have received a copy of the Complaints Policy and today's agenda. Can you confirm you have received them?
7. The procedure will be as follows:
    - 7.1. the complainant will present their complaint and explain why they are not happy with the Stage 2 outcome;
    - 7.2. the Investigating Officer and the Panel may ask questions;
    - 7.3. the Investigating Officer will present the investigation and the reasons for the outcome;
    - 7.4. the complainant and the Panel may ask questions;
    - 7.5. the complainant will be invited to set out the outcome they are seeking;
    - 7.6. everyone other than the Panel and Clerk will then leave while the Panel makes its decision. If the Panel needs more information, everyone will be invited back.
8. If you forget to say something or ask a question at the right point, please don't worry. I am happy to go back to anything you have missed. I want you to feel you have had every opportunity to have your say.
9. I also ask everyone to be respectful and courteous throughout, so the meeting can be fair to all.

Decision

10. The Panel can uphold or not uphold the complaint in whole or in part, decide on action to resolve the complaint, and recommend changes to systems or procedures.
11. Minutes will be taken as a record of the evidence and will be available to all parties. Once we have made our decision, the Clerk will write to you with the outcome as soon as possible, usually within 5 School Days.
12. Does anyone have any questions? We will now begin.

Annex F. Complaint Investigation Report Template

This is a template that an Investigating Officer may adapt to the circumstances of the complaint.

Investigation authorised by:	[Name and role]
Investigating Officer:	[Name and role]
Date investigation began:	
Terms of reference:	[Include any amendments and how they were agreed]
Background:	[Brief overview of the issues raised by the complainant]
Investigation process:	[How the investigation was carried out]
Evidence collected:	[List all evidence]
Evidence not collected:	[List any evidence that could not be collected and why]
Persons interviewed:	
Persons not interviewed:	[And why]
Summary of written evidence:	[Summarise each document and how it supported or did not support the findings]
Summary of witness evidence:	[Summarise each statement, quoting where relevant]
Facts established:	
Facts not established:	
Mitigating factors:	
Other relevant information:	
Conclusion:	
Recommendation:	Upheld / Partially upheld / Not upheld
Further details:	[Recommended actions or improvements]
Investigator's signature and date:	

Annex G. Complaints Appeal Panel Report Template

Stage 3 Complaints Appeal Panel Report for [name of School / the Trust]

Date: [date] Time: [time] Location: [location]

The complaint and desired outcomes

[Brief summary of the complaint and the outcomes sought by the complainant.]

How the complaint was dealt with

The complaint was managed in line with the Trust's Complaints Policy.

Stage	Dates	Summary
Stage 1 (informal)	Received: Responded:	[How the concern was dealt with]
Stage 2 (formal)	Received: Acknowledged: Responded:	[Investigating Officer, summary of investigation and findings, what changed from Stage 1, actions taken]

Supporting evidence

[List]

Recommendation

The Panel is asked to consider all of the evidence in the pack and the cases put by the Investigating Officer and the complainant. The Panel may uphold or dismiss the complaint in whole or in part, decide on action to resolve the complaint, and recommend changes to systems or procedures.

Annexes

- Annex 1: Formal complaint
- Annex 2: Stage 2 response
- Annex 3: [Other supporting evidence]

Name: Title: Date:

Annex H. Complaints Appeal Panel Invitation Letter Template

The Hawksmoor Learning Trust

[Trust office address]

Date: [date]

Our ref: [complaint reference]

[Name]

[Address]

By email: [email address]

Dear [name of complainant(s)]

Re: Complaints Appeal Panel in respect of [name of School / the Trust]

I am writing to let you know that a Complaints Appeal Panel has been arranged for [time] on [date] at [address]. The Panel will consider your complaint and the Stage 2 investigation and response.

Please confirm as soon as possible whether you will attend. If you wish to attend but cannot make this date, please let me know as soon as possible so that I can try to rearrange it.

If you have any documents you would like circulated before the meeting, please send them to me by 12pm on [date]. They will be shared with the Panel and with the Headteacher and/or CEO. If new documents are introduced at the meeting without being circulated in advance, the meeting may be adjourned.

A copy of the meeting papers will be sent to you at least five School Days before the meeting.

At the meeting you may explain why you are not satisfied with the Stage 2 outcome and what resolution you are seeking. The Panel may uphold or not uphold the complaint in whole or in part, decide on action to resolve the complaint, and recommend changes to systems or procedures.

You may be accompanied by a friend or relative for support. You may not be accompanied by a legal representative or anyone acting in a legal capacity. The meeting may not be recorded without the consent of everyone present.

Please let me know if you have a disability or other need that affects your ability to attend or take part, or if an interpreter would help.

If you have any questions about the arrangements or documents, please contact me at [email address].

Yours sincerely

[Name]

Clerk to the Complaints Appeal Panel

Annex I. Complaints Appeal Panel Outcome Letter Template

The Hawksmoor Learning Trust

[Trust office address]

Date: [date]

Our ref: [complaint reference]

CONFIDENTIAL

[Name]

[Address]

Dear [name]

Complaint: Stage 3 Complaints Appeal Panel outcome

I am writing to tell you the outcome of the Complaints Appeal Panel held on [date] to consider your complaint about [summary].

Having carefully considered the representations made and all the evidence provided by you and by the Investigating Officer, the Panel concluded that [conclusions and the reasons for them].

[The Panel makes the following recommendations: …]

A copy of the minutes of the meeting is enclosed.

The Panel was held in line with the Trust's Complaints Policy and is the final stage at which the Trust will consider your complaint.

If you believe the Trust did not handle your complaint in line with its published procedure, or acted unlawfully or unreasonably, you can contact the Department for Education (DfE) at www.gov.uk/complain-to-dfe. The DfE will not overturn a decision about a complaint, but it will check whether the Trust followed its procedure and the relevant legislation.

Ofsted can also consider some complaints about schools that affect the school as a whole. More information is at www.gov.uk/complain-ofsted-report or https://contact.ofsted.gov.uk/online-complaints.

Yours sincerely

[Name]

Chair of the Complaints Appeal Panel

Annex J. Complaints Appeal Panel Agenda

Stage 3 Complaints Appeal Panel: [name of School / the Trust]

Date: [date] Time: [time] Location: [location]

Panel	Chair: Member: Member:
In attendance	Clerk: Complainant(s): Representing the School / Trust: Others:

1. Welcome and introductions
2. Complainant presents a summary of the complaint
3. Questions from the School / Trust and the Panel
4. School / Trust response
5. Questions from the complainant and the Panel
6. Discussion of the complainant's desired outcomes and any possible redress
7. Closing remarks: complainant; School / Trust; Panel
8. All parties other than the Panel and Clerk withdraw
9. Panel reaches its decision and any recommendations

Annex K. Letter Template: Unreasonable Behaviour and Communication Plan [EXAMPLE]

For use at Step 2 (written warning) or Step 3 (communication plan) of Annex B. Delete the sections that do not apply. Letters must be signed by the Headteacher or CEO.

[School / Trust letterhead]

Date: [date]

PRIVATE AND CONFIDENTIAL

[Name]

[Address]

By email: [email address]

Dear [name]

Communication with [name of School]

I am writing about the way you have been contacting the School [and the Trust]. We value working in partnership with parents and carers, and we want to make sure your concerns are dealt with properly. We also have a responsibility to protect our staff and to make sure their time is focused on the education and welfare of all our pupils.

Since [date], [summarise factually, for example: the School has received 27 emails from you about the same matter, several sent to individual staff; on [date] you raised your voice at a member of staff in the playground in front of pupils]. This is not in line with the Trust's Parent and Visitor Code of Conduct, a copy of which is enclosed.

[Your complaint about [subject] completed the Trust's complaints procedure on [date]. The School will not respond to further correspondence about this matter, although it will read any correspondence to check whether it raises a new issue.]

[Step 2] I am asking you to [describe the change needed, for example: contact the School only through the School office email and allow three working days for an acknowledgement]. If the behaviour continues, the Trust may put in place a formal communication plan.

[Step 3] From [date], the following arrangements will apply:

- all contact should be by email to [School office email / named address];
- your named point of contact will be [name, role];
- [please limit emails to one a week, except in an emergency];
- [meetings will be by appointment only, with two members of staff present and an agreed agenda];
- [please do not approach staff about this matter at the start or end of the school day].

These arrangements do not affect your child's education or the information you normally receive about their progress. You can still raise any safeguarding concern at any time by telephoning the School and asking for the Designated Safeguarding Lead, and any genuinely new concern will be considered.

Before reaching this decision I considered whether there are any needs or circumstances we should take into account. If there is anything that affects how you are able to communicate with us, please let me know and we will consider reasonable adjustments.

These arrangements will be reviewed on or before [date, normally within one term]. If you would like the decision reviewed, please write to [the CEO / the Chair of the Trust] at [address] within 10 School Days, setting out your reasons.

Yours sincerely

[Name]

[Headteacher / CEO]

Enc. Parent and Visitor Code of Conduct