

The Spire Church of England Learning Trust

Complaints Policy

2026 - 2029

This policy was reviewed and updated by the Chief Executive Officer/Executive Headteacher of The Spire Church of England Learning Trust. It is approved by the Trust Board on a triennial basis and is implemented by all schools within the Trust.

This policy will be subject to ongoing review and may be amended prior to the scheduled review date to reflect changes in legislation or guidance. The Trust will also ensure that this procedure is reviewed at least annually to maintain compliance with the Academy Trust Handbook and other relevant statutory requirements.

Reviewed: July 2026

Ratified: July 2026

Next Review: July 2029

In collaboration with



1. Introduction

The Spire Church of England Learning Trust is committed to providing high-quality education in an open and transparent environment. We welcome feedback from parents, carers, pupils and third parties.

In line with our Church of England foundation, we are committed to resolving concerns with dignity, mutual respect and a spirit of reconciliation. Wherever appropriate, the Trust seeks to address concerns through open dialogue and restorative approaches, while ensuring that all matters are handled fairly, transparently and with integrity.

The Trust will work, where appropriate, with the Diocese to ensure that complaints relating to the Church of England foundation are handled in line with diocesan expectations and guidance, including reference to any diocesan complaints or escalation procedures where applicable. The Trust will work collaboratively with the Diocese where complaints relate to the Christian distinctiveness of the school.

The Diocese is not part of the Trust's formal complaints procedure but may be contacted in relation to matters concerning Church of England designation or ethos.

We are committed to handling concerns and complaints in a way that is:

- Fair
- Open
- Prompt
- Unbiased

This policy explains how concerns and complaints should be raised and handled.

This procedure meets the requirements set out in the Academy Trust Handbook and the Trust's Funding Agreement and Department for Education guidance on school complaints, ensuring that complaints are handled in a fair, transparent and proportionate manner.

This policy is published on the Trust and each school's website as required by the Academy Trust Handbook and in line with statutory requirements.

It can be available on request from the school office. Contact details of each school are available at the end of this document.

2. Matters not covered by this policy

This procedure does not apply to:

- Admissions appeals
- Exclusion appeals
- Statutory SEND processes
- Staff grievances, capability or disciplinary matters
- Complaints concerning a third party used by the school, please complain directly to the third party themselves.
- Whistleblowing (separate policy applies)
- Concerns relating to staff conduct that do not meet the harm threshold will be managed under the Trust's Low-Level Concerns Policy, in line with Part 4 of Keeping Children Safe in Education (KCSIE).
- the curriculum, including Religious Education and collective worship, which are subject to separate procedures. Where appropriate, complaints relating specifically to the denominational character or religious character of the school, including Religious Education or collective worship, may also be referred by the complainant to the Diocese in accordance with diocesan guidance and published procedures.
- Complaints that are subject to ongoing legal proceedings or where legal action is being pursued. In such cases, the Trust may pause or decline to investigate the complaint until those proceedings are concluded.

These matters are subject to separate statutory procedures and are not considered under this Complaints Policy.

Please refer to your school office, should you require help with any of the above where you will be directed to the statutory appeal or review process applicable.

Where a complaint overlaps with staff disciplinary or grievance matters, the Trust will determine the most appropriate process to follow. In such cases, elements of the complaint may be addressed through separate procedures to ensure fairness, confidentiality and compliance with employment law.

3. Concern vs Complaint

A **concern** is an expression of worry or doubt for which reassurance is sought.

A **complaint** is an expression of dissatisfaction about actions taken or a lack of action.

Concerns relating to staff conduct or behaviour that do not meet the harm threshold but may still be inappropriate will be managed in accordance with the Trust's Low-Level Concerns Policy. Expressions of dissatisfaction about actions taken or a lack of action by the school or Trust will be addressed through this Complaints Policy.

Concerns should be raised informally wherever possible to enable quick resolution.

4. Complaints Overview – A Quick Guide for Parents

We aim to resolve concerns quickly, fairly and respectfully.

It is in the best interests of all parties that complaints are addressed and resolved at the earliest possible stage. Many concerns can be managed and resolved informally, without the need to initiate formal procedures.

The Trust and its associated schools are committed to taking informal concerns seriously and will make every reasonable effort to achieve a prompt resolution.

However, there may be occasions when a complainant wishes to raise their concern formally. In such instances, the Trust's formal complaints procedure should be initiated through the relevant school. The matter will then be managed in accordance with the stages set out within this procedure.

Step 1 – Speak to us

Talk to your child's teacher or a member of staff.

Step 2 – Formal complaint

Submit a complaint via the school office. A senior leader will investigate.

Step 3 – Independent review

Request a panel review if you remain unhappy.

Timescales

We aim to acknowledge within 5 working school days. Most complaints are resolved within 20 – 40 working school days depending on complexity. Working school days are defined as term-time school days. Timescales may vary depending on complexity, however, they will remain reasonable, proportionate, and in line with Department for Education best practice expectations.

How to complain

Complainants are encouraged to use the Trust's complaints form (Appendix A) to ensure that all relevant information is provided and to support a timely and effective investigation. Include what happened and the outcome you would like.

Complaints should be clear, concise and focused on the key issues. As a guide, most complaints can usually be set out within 1,000 words. Where a complaint is significantly longer, the Trust may reasonably request a summary of the key points to support a timely and proportionate investigation. This will not prevent the complaint from being considered in full.

Safeguarding

Any concerns about a child's safety will be acted upon immediately in line with safeguarding procedures.

After the final stage

You may contact the Department for Education if you remain dissatisfied. The Department for Education will not reinvestigate the substance of the complaint, but will consider whether the Trust has followed its complaints procedure correctly and whether it has complied with relevant education legislation and statutory guidance. There is no further right of appeal within the Trust after Stage 3.

A summary of expectation of timescales for each stage

Stage	Timescale for Response
Stage 1	15 working school days
Stage 2	20 working school days
Stage 3	20 working school days to hearing + 5 working school days for outcome

Please note – working school days exclude days that fall within the school holiday period.

5. Raising Concerns (Informal Stage)

Concerns should initially be raised with the relevant staff member, usually the class or form teacher.

Most concerns can be resolved through discussion or informal action.

The Trust/school encourages concerns to be raised informally in the first instance, usually with the member of staff most closely involved, as this often leads to the quickest resolution. However, there is no requirement for the complainant to approach the individual concerned, and concerns may be raised directly through the formal complaints procedure if preferred.

The Trust/school will:

- Take concerns seriously
- Respond promptly
- Keep matters confidential where appropriate

If a concern is not resolved, it may be escalated to the formal complaints procedure.

6. Accessibility and Equality

The Trust will comply with the Equality Act 2010 by making reasonable adjustments to ensure this process is accessible. This may include:

- Providing information in alternative formats
- Supporting completion of forms
- Arranging accessible meetings
- Support for parents with additional needs

7. Safeguarding

Where a complaint raises safeguarding concerns:

- The Trust will follow safeguarding procedures in line with the current version of Keeping Children Safe in Education (KCSIE) which will be updated annually by the Department for Education
- Concerns will be referred to the Designated Safeguarding Lead
- Where a safeguarding concern is identified, immediate action will be taken to ensure the safety and welfare of the child. This may include removing risk, securing appropriate supervision, and seeking advice from external agencies without delay.
- Where required, referrals will be made to external agencies
- Where a safeguarding concern meets the threshold for referral, the Trust will not undertake a detailed internal investigation before referral. Any actions taken prior to referral will be limited to those necessary to establish whether a referral is required and to ensure the immediate safety of children, in line with Keeping Children Safe in Education (KCSIE).

Safeguarding procedures will take precedence over the complaints process. Where necessary, the complaints procedure may be paused or adapted to ensure that safeguarding matters are addressed first.

Where allegations meet the harm threshold, the Trust/school will follow its Allegations Against Staff procedures, including referral to the Local Authority Designated Officer (LADO).

Where a complaint involves allegations about a member of staff, the Trust/school will manage this in accordance with Part 4 of Keeping Children Safe in Education (KCSIE), which sets out the statutory guidance for managing allegations against staff.

All staff will be made aware of this Complaints Policy and how it interacts with safeguarding procedures as part of regular safeguarding training. This will ensure that staff understand when concerns should be managed under safeguarding processes rather than the complaints procedure.

All staff must be able to identify safeguarding concerns within complaints and act immediately. Staff must not promise confidentiality where safeguarding concerns are raised.

Whistleblowing procedures will be followed for staff where appropriate.

8. Social Media

All parties are expected to act respectfully. Concerns should be raised through this procedure to ensure fairness.

9. Timescales

Most complaints will be resolved within the timescales set out at each stage of this procedure. Timescales are indicative and aim to be as prompt as possible.

As a guide, the Trust would normally expect the full process to be completed within approximately 60 working school days, although complex cases may take longer.

If delays occur, the complainant will be informed and updated.

Complaints should normally be raised within 3 months of the issue, unless there are good reasons for delay.

Timescales may be extended in exceptional circumstances, for example where the complaint is complex or further investigation is required. Any changes will be clearly communicated to the complainant.

10. Data Protection and Confidentiality

All personal data will be processed in accordance with the UK GDPR and Data Protection Act 2018.

- Information will be shared on a need-to-know basis
- Confidentiality will be maintained wherever possible
- Information may be shared where required for safeguarding or legal purposes

A written record will be kept of all complaints, including:

- whether they were resolved at the informal stage or proceeded to a formal stage;
- the stage at which they were concluded;
- the outcome (including whether the complaint was upheld, partially upheld or not upheld); and
- any actions taken by the school or Trust as a result
- made available for inspection on request by the Trust Board and the Department for Education

These records will be retained in accordance with the Trust's records retention policy and made available to the Department for Education (DfE) on request, in line with the Academy Trust Handbook. Records will be retained securely and separately from pupil files where appropriate.

11. Who should I contact?

If you have a concern, you should usually raise it with the staff member most closely involved in the issue in the first instance. This will normally be your child's class or form teacher. If your concern relates to a different area, you may contact:

- A member of the Senior Leadership Team (for wider school issues)
- The school office (for administrative matters)
- If the concern is about the Headteacher/Head of School, you should contact the Clerk to the Governors.

The school office can help direct you to the most appropriate person if you are unsure.

Complaints should normally be submitted using the Trust's complaints form (Appendix A), to ensure that all relevant information is clearly recorded and can be properly investigated and sent to the school office.

Please mark the complaint as Private and Confidential and use 'Formal Complaint' on your email heading.

Complainants may raise a formal complaint without completing the informal stage.

A complainant may withdraw their complaint at any stage of the process.

12. Formal Complaints Procedure

Where a complaint overlaps with another formal process (for example, disciplinary, safeguarding or legal proceedings), the Trust/school will determine the most appropriate process to follow. The complaints procedure may be paused where necessary to allow those processes to be completed.

If deadlines cannot be met, the Trust/school will inform the complainant in advance with clear reasons and revised timescales

All responses will be provided in writing unless an alternative format is requested.

Please note – working school days exclude days that fall within the school holiday period.

Stage 1 – Formal Complaint (Investigation by School/Headteacher)

This stage applies where the informal process has not resolved the concern. This will be conducted by a person not involved in the concern, and with no conflict of interest.

To submit a complaint:

Complaints should be clear, concise and focused on the key issues. Please use the Trust Complaints Form (Appendix A).

As a guide, most complaints can usually be set out within 1,000 words. Where a complaint is significantly longer, the Trust/school may reasonably request a summary of the key points to support a timely and proportionate investigation. This will not prevent the complaint from being considered in full.

Provide written details including:

- Summary of the complaint
- Who was involved
- Why the matter remains unresolved
- Desired outcome

The school will:

- Acknowledge within 5 working school days
- Investigate the concern
- Provide an outcome letter detailing a clear written response explaining findings, decision and any actions taken within 15 working school days

If you remain dissatisfied, you may progress to Stage 2.

Stage 2 – Complaint Review (Headteacher/Head of School or Senior Leader not previously involved)

A review of the Stage 1 investigation will be conducted by a Senior Leader or Headteacher/Head of School. This will be conducted by a person not involved in Stage 1 wherever possible, and with no conflict of interest.

Requests for a Stage 2 review must be made within 20 working school days of the date on the Stage 1 outcome letter.

The school will:

- Acknowledge within 5 working school days
- Conduct a full review including evidence and interviews if required
- Provide a written outcome within 20 working school days

The outcome will:

- Explain the decision
- Outline any actions
- Provide details of Stage 3

If you remain dissatisfied, you may request a Stage 3 panel.

Stage 3 – Independent Complaints Panel

Requests for a Stage 3 panel must be made within 20 working school days of the date on the Stage 2 outcome letter.

The panel hearing will normally take place within 20 working school days of the request. If the panel hearing cannot take place within the stated timescale, the Trust will provide a clear explanation and revised timescale to all parties.

The Clerk will:

- Ensure that the procedure is followed correctly, take a formal record of the proceedings, and communicate the panel's decision to all parties.
- Be the contact point
- Circulate papers
- Ensure procedure compliance

The Panel Members will:

- Consist of at least three members.
- Include at least one member who is independent of the management and running of the Trust, including governance.
- This member will not have been involved in the complaint and will have no conflict of interest.
- The independent member may be drawn from outside the Trust or from within the Trust (for example, from another school), provided they are demonstrably independent of the issues under consideration and able to act impartially. The Chair of Directors will have the final say in this regard.
- The panel will be impartial, independent of the complaint, and will have had no prior involvement in the matter.
- The panel may include Governors (including Foundation Governors where appropriate) or staff from within the Trust, provided they have relevant skills and experience, have had no prior involvement in the complaint, and do not give rise to any conflict of interest or perceived lack of impartiality. The Chair of Directors will have the final say in this regard.

This approach is intended to ensure flexibility in panel composition while maintaining independence and reducing the risk of challenge to the fairness and integrity of the process.

The Complainant will:

- Be able to present evidence in support of their complaint
- Have the right to submit evidence in advance of the hearing in line with agreed timescales
- Receive the evidence pack in advance of the hearing
- Call witnesses where appropriate
- Ask questions of the Trust/school's evidence through the panel
- Be given the opportunity to respond to relevant evidence presented at the hearing

The Hearing will include:

- The complainant presents their case and may be accompanied by a friend, relative or representative for support
- The school/Trust presents its response to the complaint
- The panel asks questions of both parties to clarify evidence
- Both parties are given the opportunity to make final statements
- Hearings are private and confidential. Recording or reporting proceedings (including via social media or external media organisations) is not permitted without prior agreement of the Trust
- Legal representatives and members of the media are not normally permitted. Requests for legal representation will be considered on a case-by-case basis, particularly where required by law or to meet equality or accessibility needs

The Panel will:

- Consider the complaint in full and reach its own evidence-based conclusions on the facts
- Consider the complaint in full, including both:
 - the way in which the complaint was handled at earlier stages and the process; and
 - the substance of the complaint (merits), including whether the outcome was reasonable in light of the evidence.
- The panel will determine the appropriate scope of its consideration, which may include reviewing the process followed at earlier stages and/or rehearing the complaint in full, depending on the circumstances.
- Consider all relevant evidence, including any new evidence not previously available at earlier stages, where appropriate. The panel can consider new evidence at its discretion but should not unreasonably refuse it.
- Will not consider wholly new complaints not previously raised
- Determine whether the outcome at earlier stages was reasonable and procedurally fair
- Decide whether the complaint is upheld, partially upheld, not upheld or dismissed
- Make clear findings and, where appropriate, recommendations for action
- Ensure any findings and recommendations are communicated clearly to enable improvement

A written decision including the findings and reasoning will be issued to the complainant and the Trust within 5 working school days.

The panel's decision is final and concludes the Trust's internal complaints procedure. The Stage 3 panel decision is final and there is no further right of internal review or appeal within the Trust.

13. Complaints About Individuals

- **Headteacher or Governors**

Where a complaint concerns the Headteacher or Head of School, the complainant should contact the Clerk to the Governors in the first instance. The Clerk will refer the matter to the Chair of Governors, who will oversee the handling of the complaint.

Where a complaint concerns a Governor, the complainant should also contact the Clerk to the Governors.

- **Director**

Where a complaint concerns a Director, the complainant should contact the Clerk to the Trust Board, who will refer the matter to the Chair of the Trust Board.

- **Chair of Governors or Chair of the Trust Board**

Where a complaint concerns the Chair of Governors, the complainant should contact the Clerk, who will refer the matter to the Vice Chair or an independent panel as appropriate.

Where a complaint concerns the Chair of the Trust Board, the complainant should contact the Clerk, who will arrange for the complaint to be considered by an independent panel or another appropriate mechanism to ensure impartiality.

- **CEO**

Where a complaint concerns the CEO, the complainant should contact the Clerk to the Trust Board, who will refer the matter to the Chair of the Trust Board.

Complaints about the Trust as an organisation should be directed to the Clerk to the Trust Board, who will ensure that the complaint is handled at an appropriate level in line with this procedure.

In all cases, the complaints procedure will be followed as far as possible, with appropriate adjustments to ensure independence, fairness and impartiality.

14. Managing Serial, Persistent or Unreasonable Complaints

In line with Department for Education guidance, the Trust recognises that, in a small minority of cases, complaints may be pursued in a manner that is unreasonable or unreasonably persistent.

The Trust/school is committed to handling all complaints fairly and impartially, and to enabling concerns to be resolved wherever possible. However, it also has a duty to ensure that staff can carry out their duties without undue disruption.

A complaint (and/or the behaviour of a complainant) may be considered unreasonable where it prevents or significantly hinders the Trust's ability to investigate or resolve the complaint, in line with Department for Education guidance.

14.1 Examples of Unreasonable Behaviour

Examples may include (but are not limited to):

- Refusal to articulate the substance of a complaint or specify the grounds of the complaint
- Refusal to co-operate with the complaints process whilst still wishing the complaint to be resolved
- Changing the basis of the complaint as the investigation proceeds
- Repeatedly raising the same complaint after the procedure has been concluded
- Excessive, repetitive or unreasonable contact (e.g. frequent emails, calls or correspondence)
- Use of abusive, offensive or threatening language towards staff
- Publishing or sharing information relating to the complaint via social media in a way that undermines the process
- Recording meetings or interactions without prior agreement

This list is not exhaustive, and each case will be considered on its own merits.

14.2 Staged Approach to Managing Unreasonable Behaviour

Before applying any formal restrictions, the Trust will normally adopt a staged and proportionate approach. Any restrictions will not prevent a complainant from having their complaint considered through the formal stages of this procedure where it has not yet been exhausted.

Stage A – Informal Warning

The Trust/school will:

- Write to the complainant outlining concerns regarding their behaviour
- Clarify expected standards of communication
- Provide an opportunity to continue with the complaints process in a constructive way

Stage B – Formal Warning

If the behaviour continues, the Trust/school will:

- Issue a formal written warning
- Clearly explain that continued behaviour may result in restrictions
- Set out the specific changes required

Stage C – Implementation of Restrictions

Where behaviour does not improve, the Trust/school may apply proportionate and time-limited restrictions. These may include:

- Limiting contact to a single named point of contact
- Restricting communication to a specific method (e.g. written correspondence only)
- Limiting the frequency of contact

- Declining to consider further correspondence on the same issue once the complaints procedure has been exhausted

Any restrictions imposed will:

- Be reasonable and proportionate
- Be applied consistently and fairly
- Be clearly communicated in writing
- Be subject to regular review

14.3 Decision-Making

Decisions to apply restrictions will be made by:

- The Headteacher or Head of School (for school-level matters), or
- The Chief Executive Officer (CEO) (for Trust-level or escalated complaints), or
- The Chair of Governors or Trust Board, where appropriate

The decision-maker will ensure that any action taken is reasonable, proportionate and consistent with Department for Education guidance.

15. Review of Restrictions and Right to Challenge

Where restrictions are applied, the complainant will be notified in writing. This notification will include:

- The reasons for the decision
- The nature of the restrictions
- The duration of the restrictions
- How and when the decision will be reviewed

The complainant has the right to request a review of the decision within 10 working school days of notification.

The review will be carried out by:

- A senior leader, governor or director not previously involved in the decision, where possible

The reviewer will consider whether the restrictions are:

- Appropriate
- Proportionate
- In line with this policy and Department for Education guidance

The outcome of the review will be confirmed in writing and will set out whether:

- The restrictions will remain in place
- The restrictions will be amended
- The restrictions will be removed

The decision following the review is final within the Trust's internal procedures. However, all restrictions will remain subject to periodic review to ensure they remain appropriate and proportionate.

16. Anonymous Complaints

Anonymous complaints will be considered on a case-by-case basis, depending on:

- Seriousness
- Credibility
- Ability to investigate

17. After the Final Stage

If you have completed the Trust's complaints procedure and remain dissatisfied, you may refer your complaint to the Department for Education (DfE).

The Department for Education will not reinvestigate the substance of the complaint but will consider whether the Trust has complied with its published complaints procedure and relative statutory requirements.

You can contact the Department for Education at: <https://www.gov.uk/complain-about-school>

Ofsted does not investigate individual complaints but may use information from complaints to inform its inspection and regulatory activity.

18. Complaints that may lead to staff capability or disciplinary procedures

Where a complaint leads to staff capability or disciplinary procedures, these will be managed in accordance with the Trust's internal policies and employment procedures. These processes are confidential.

The complainant will be informed that the matter is being addressed, but they will not be involved in any disciplinary proceedings or receive detailed information about them. The Trust/school will, however, seek to reassure the complainant that appropriate action has been taken where necessary.

Where allegations relate to serious misconduct by a teacher, the Trust may refer the matter to the Teaching Regulation Agency (TRA) in line with statutory guidance.

19. Governance and Oversight

To support governance responsibilities and continuous improvement ensuring effectiveness and identify trends and systemic issues, the Trust Board will receive anonymised reports, at least annually, on:

- Complaint numbers
- Themes
- Outcomes
- Lessons learned

They will review the effectiveness of the complaints procedure to ensure compliance with statutory guidance and the Academy Trust Handbook.

The Trust will ensure that lessons learned from complaints are used to inform improvements to policy, practice and service delivery across its schools.

20. Relevant legislation and guidance

The Equality Act 2010 <https://www.legislation.gov.uk/ukpga/2010/15/contents>

The Data Protection Act 2018 <https://www.legislation.gov.uk/ukpga/2018/12/contents>

The Education (Independent School Standards) Regulations 2014

<https://www.legislation.gov.uk/uksi/2014/3283>

Education Act 2002 <https://www.legislation.gov.uk/id/ukpga/2002/32>

The Department for Education *Best Practice advice for school complaints procedures*

<https://www.gov.uk/government/publications/school-complaints-procedures/best-practice-advice-for-school-complaints-procedures-2019>

Contact Details List



The Spire Church of England Learning Trust

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Tel : 01527 832376



St John's CE Primary School

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St Matthias CE Primary School

admin@stmatthias.worcs.sch.uk

Tel : 01684 574984



Witton Middle School

office@witton.worcs.sch.uk

Tel : 01905 773362



Catshill First School and Nursery

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Catshill Middle School, Bromsgrove

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Appendix A

The Spire Trust - Complaints Form

Name	
Name of pupil, year group and your relationship to them (where applicable)	
Contact address	
Contact telephone day	
Contact telephone mobile	
Contact email address	
Details of the complaint	
Action taken so far (including staff member who has dealt with it so far) or solutions offered	
The reason that this was not a satisfactory resolution for you	
What action would you like to be taken to resolve the problem?	

Signed:

Date:

Official use Date received:

Signed: