KEYS
Academy Trust

Complaints Policy

KEYS Academy Trust
Unlocking the future

Version control summary and overview details

TKAT Statutory Policy

- All schools require a policy on this area.
- There should be no changes to the core text.
- LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately.
- This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.

Version control

V1

- Complete rewrite based on legal support from Browne Jacobson, Safeguarding Supervision Lead.
- Also includes a new section on AI-produced complaints.

Reviewed by (Trust Officer)	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	FAPPP
Trust date of approval:	Autumn 26
Trust date of next review:	Autumn 27

TKAT vision

We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note

Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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1. Purpose

1.1 The purpose of this policy is to provide a clear, fair, accessible and consistent way to raise, consider and resolve concerns and complaints about The Keys Academy Trust (TKAT), its schools and the facilities and services they provide. TKAT values constructive relationships with pupils, parents and its communities, and recognises that responding openly and proportionately to concerns supports trust, accountability and improvement.

1.2 The procedure safeguards fair consideration for complainants and for individuals complained about, while meeting the applicable requirements for academy complaints procedures.

2. Aims

2.1 The aims of this policy are as follows:

a) Encourage early, constructive and informal resolution wherever appropriate, without obstructing access to formal stages.
b) Provide clear routes, responsibilities, timescales and review rights across all TKAT schools.
c) Consider complaints impartially, sensitively, thoroughly and without unnecessary delay.
d) Ensure accessible arrangements, reasonable adjustments and respectful communication.
e) Protect confidentiality, procedural fairness and the wellbeing of those involved.
f) Direct matters governed by separate statutory or Trust procedures to the correct route.
g) Record outcomes and use learning from complaints to improve provision and practice.

3. Scope

3.1 The statutory three-stage procedure in the section about 'Complaints procedure for parents of current pupils' applies to complaints from parents of pupils currently registered at a TKAT school about that school or the provision it makes for their child. Other people, including members of the public and former parents, may raise concerns and complaints using the separate arrangements in the section about 'Concerns and complaints from other persons'. Complaints about central Trust services are routed through the section about 'Complaints about senior leaders, governance or the Trust' or the section about 'Concerns and complaints from other persons' as appropriate.

3.2 Pupils may speak to a trusted adult about any concern. Their concerns will be heard and handled appropriately, including through safeguarding procedures where relevant; a parent or carer will normally pursue a formal complaint on their behalf, taking account of the pupil's wishes and circumstances.

3.3 A concern is an expression of worry or doubt for which reassurance is sought. A complaint is an expression of dissatisfaction about action taken or a failure to act. A school day excludes weekends, school holidays and days of full school closure.

3.4 Matters governed by another statutory process or specialist policy are listed in Appendix 1. Where a complaint spans several routes, TKAT will explain how the issues will be allocated and will not allow procedural categorisation to delay safeguarding action.

4. Definitions

4.1 Key definitions referred to in this policy are as follows:

a) References to "headteacher" include an executive headteacher or head of school where delegated to act in that capacity.
b) "Parent" includes a parent, carer or person with parental responsibility or care of the pupil.
c) 'Complaint' means an expression of dissatisfaction however made, about actions taken or a lack of action.
d) 'Concern' means an expression of worry or doubt over an issue considered to be important, for which reassurances are sought.
e) 'Meeting' and 'hearing' means an in person or virtual meeting or hearing (i.e. telephone or video conference where all parties can participate verbally), virtual meetings/hearings will only be held if all parties have access to appropriate equipment to attend and are happy to do so.
f) 'Parent' means a biological parent, carer, or anyone who has parental responsibility or care for a child.
g) 'School days' excludes weekends and school holidays and periods of partial or total school closure.
h) 'Trust' means the academy trust.

5. Roles and responsibilities

The role of the governance professional of the trustees

5.1 The governance professional of the trustees is the contact point for the complainant and the stage 3 complaints committee, and should:

a) Ensure that the complainant is fully updated throughout the Stage 3 procedure.
b) Liaise with staff, headteacher, the chief executive officer, chair of LGB of a school and chair of the trustee board (as applicable) to ensure the smooth running of the stage 3 complaints procedure.
c) Be mindful of the timescales for responding to complaints.
d) Ensure that all people involved in the complaints process are aware of their legal rights and duties, including any under legislation relating to school complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR).
e) Ensure that the complaints committee has access to legal advice, where appropriate.
f) Set the date, time, and venue of the hearing, taking reasonable steps to find a date that is convenient to all parties and that the venue and proceedings are accessible.
g) Collate any written material relevant to the complaint (for example: Stage 3 paperwork, school and complainant submissions) and send it to the parties in advance of the hearing within an agreed timescale.
h) Minute the stage 3 hearing.
i) Notify all parties of the complaints committee's decision.
j) Assist the school/Trust in issuing a summary letter to the complainant.

The role of the headteacher

5.2 The headteacher is the contact point for the complainant and the complaints committee, and should:

a) To ensure that the complainant is fully updated throughout the Stage 2 procedure.
b) To ensure that the correct procedure has been followed.
c) To ensure that an investigation is carried out, and a report compiled.
d) To meet the complainant, if appropriate.
e) If the complaint is being referred to Stage 3, notify the governance professional of the trustees to arrange the complaints committee.

The role of the chair of the complaints committee

5.3 The chair of the complaints committee has a key role, ensuring that:

a) The hearing is conducted in an informal manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy.
b) Complainants who may not be used to speaking at such a hearing are put at ease.
c) The remit of the complaints committee is explained to the complainant;
d) The written material is seen by everyone in attendance (provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR).
e) Key findings of fact are made, and that any issues not previously mentioned in writing should not be raised at the hearing and, if they are mentioned at the hearing, these should not be noted or considered by the complaints committee.
f) Both the complainant and the school/Trust are given the opportunity to make their case, and seek clarity, either through written submissions ahead of the hearing, or verbally in the hearing itself.
g) The complaints committee is open-minded, acts independently, and no committee member has an external interest in the outcome, or any involvement in an earlier stage of the procedure.
h) The hearing is minuted.

6. Key principles and general arrangements

Accessibility, fairness and communication

6.1 The following should be noted with regard to informal and formal concerns:

a) Complaints can be raised in person, by telephone or in writing at the informal stage.
b) Formal complaints should normally be in writing.

6.2 The following should be noted with regard to accessibility support for making a concern:

a) Assistance to record a complaint will be provided where necessary. Reasonable adjustments will be considered under the Equality Act 2010, including accessible formats, interpretation and alternative arrangements for meetings.
b) A complainant may use a representative with appropriate authority. No person should investigate or determine a complaint where they have a conflict of interest or material prior involvement.

6.3 You may wish to ask third party organisations like the Citizens Advice to help you with composing a complaint.

Respectful complaints (including social media)

6.4 Complainants and staff are expected to communicate respectfully.

6.5 Raising a complaint in good faith must not disadvantage a pupil.

6.6 Complainants are encouraged to contact the school directly rather than publicising personal details on social media.

6.7 The school will not restrict lawful criticism merely because it is unwelcome.

Time limits

6.8 Complaints should normally be raised within three calendar months of the incident, or the last of a series of related incidents. Late complaints will be considered where there are exceptional circumstances, including barriers to earlier reporting.

6.9 The designated decision-maker will explain any refusal to accept a late complaint.

6.10 Complaints received during a school holiday will normally be treated as received on the first school day of the following term, except where urgent safeguarding or safety action is required.

6.11 The timescales in this policy are targets. Where an investigation, school closure or external process makes a deadline impracticable, the complainant will be informed promptly of the reason and a revised date.

6.12 If necessary information is missing, TKAT will seek clarification and explain any pause. Ongoing legal or statutory proceedings will be assessed case by case; the Trust will not automatically suspend all issues.

Confidentiality and withdrawal

6.13 Information will be shared on a need-to-know basis and handled in accordance with UK GDPR, the Data Protection Act 2018 and TKAT retention arrangements.

6.14 A complaint about an employee may need to be shared with that employee so they can respond fairly; confidential employment outcomes will not normally be disclosed.

6.15 A complainant wishing to withdraw should confirm this in writing where practicable. TKAT may still act on safeguarding or serious organisational concerns.

Complaints involving court proceedings

6.16 Any complaints made whereby there are ongoing court procedures, either within private family law, or within social care court proceedings, will be considered on a case-by-case basis and any complaint investigation may be placed on hold until the outcome of the court proceedings, to avoid contradictory decision-making with the judiciary.

7. Roles and responsibilities

Trust Board and Local Governing Bodies (LGBs)

7.1 The Trust Board is accountable for maintaining a compliant complaints procedure and appropriate oversight of its implementation.

7.2 Local Governing Bodies support school-level implementation and scrutiny within the Scheme of Delegation; they must not pre-judge individual complaints or compromise their eligibility to sit on a later panel.

Headteacher and designated investigator

7.3 The headteacher oversees informal and Stage 2 school complaints unless personally involved.

7.4 The investigator establishes relevant facts, hears the parties fairly, keeps appropriate records and issues a reasoned response.

7.5 A suitable uninvolved person may be appointed to investigate, including an external investigator where appropriate.

Governance professional

7.6 The Trust governance professional coordinates Stage 3 hearings, checks conflicts, arranges an appropriately constituted panel, circulates papers, advises on procedure, records the hearing and communicates the decision.

7.7 A local governance professional may coordinate alternative Stage 2 routes as specified in the section about ‘Complaints about senior leaders, governance or the Trust’.

7.8 Governance professionals must not determine complaints about their own conduct.

Complaints committee

7.9 The committee considers the complaint impartially, permits each side to present its case, makes findings and recommendations and gives written reasons.

7.10 The chair ensures a respectful, accessible and non-adversarial hearing.

7.11 The committee may seek legal or procedural advice without delegating its decision.

8. Complaints procedure for parents of current pupils

Stage 1 – Informal resolution

8.1 The Trust expects all complainants to make reasonable attempts to seek an informal resolution. This will usually be the most effective way to swiftly resolve any concerns

8.2 Raise the concern with the class teacher or another appropriate member of staff, in person, by telephone or email. Explain what happened and what resolution is sought.

8.3 The school will normally seek to resolve concerns within 15 school days, keeping the parent informed if longer is needed.

8.4 Staff will record significant concerns and agreed actions in the school's authorised recording system and notify the headteacher of serious issues.

8.5 A concern involving the headteacher should follow the guidance set out in the section about 'Complaints about senior leaders, governance or the Trust'.

8.6 If the concern remains unresolved, the parent may make a formal complaint within 15 school days of the informal response or notification that Stage 1 has ended. Parents may request Stage 2 sooner where informal handling is inappropriate or has not produced a satisfactory outcome.

Stage 2 – Formal written complaint

8.7 Send a written complaint to the headteacher of the school, headed "Formal complaint", unless the section about 'Complaints about senior leaders, governance or the Trust' identifies an alternative recipient.

8.8 In all cases, your written complaint must include ALL of the following:

a) The nature of the complaint.
b) Details of how the matter has been dealt with so far.
c) The names of potential witnesses, dates and times of events and copies of all relevant documents;
d) A clear statement of the actions that you would like us to take to resolve your complaint.

8.9 Appendix 2 provides optional guidance on what to include; whilst this is strongly recommended to be followed, failure to include all information will not invalidate an otherwise understandable complaint.

8.10 The complaint will normally be acknowledged within 5 school days, with the investigator and anticipated response date identified.

8.11 A substantive written response will normally be provided within 15 school days of receipt.

8.12 Where helpful, the investigator may offer a meeting, normally within 10 school days, and may speak to witnesses and review relevant records.

8.13 Pupils will be interviewed sensitively with appropriate support and safeguarding oversight; parents will ordinarily be involved unless doing so would be inappropriate or unsafe.

8.14 The subject of a complaint will have a fair opportunity to respond.

8.15 The Stage 2 response will set out the issues considered, relevant findings, whether each aspect is upheld, partly upheld or not upheld, reasons, any appropriate action or remedy, and how to request Stage 3. Staff disciplinary or confidential personal information will not be disclosed inappropriately.

Stage 3 – Complaints committee hearing

8.16 If dissatisfied with the Stage 2 response, the parent may request a hearing by writing to the Trust governance professional within 15 school days of receiving the outcome.

8.17 The request should explain the remaining concerns and desired outcome. Late requests may be accepted in exceptional circumstances. Receipt will normally be acknowledged within five school days.

8.18 The Trust will convene a committee of at least three people who have not been directly involved in the matters complained about. At least one must be independent of the management and running of the school concerned. TKAT will normally seek a person with no association with the Trust; a governor of another TKAT school may qualify only following a documented independence and conflict assessment. A trustee, member or employee of the school concerned will not be presented as the independent member.

8.19 No panel member may have prior involvement in the complaint.

8.20 The Trust will aim to hold the hearing within 20 school days of the request.

8.21 At least 5 school days' notice of the date, venue or remote arrangements, membership and procedure will normally be given.

8.22 Both sides will normally receive the evidence bundle at least 3 school days beforehand.

8.23 The parent may attend and be accompanied by a friend, relative, interpreter or other supporter. Remote attendance may be offered by agreement where suitable and accessible. Reasonable objections to panel membership will be considered.

8.24 The committee will review the complaint and the adequacy of the response, considering relevant evidence and any procedural shortcomings. It may uphold, partly uphold or dismiss the complaint, determine appropriate remedies and recommend improvements. It will not normally determine wholly new complaints, which should be considered separately.

8.25 The committee will send its reasoned written decision and recommendations to the complainant and, where relevant, the person complained about within 10 school days of the hearing. The decision concludes TKAT's internal statutory complaints procedure. Appendix 5 sets out the hearing arrangements.

8.26 If, despite best efforts, it is not possible to find a mutually convenient date and time for a hearing within a reasonable timeframe, the clerk/governance professional may determine that the hearing proceeds on the basis of written submissions from both parties.

8.27 The complaints committee itself may take legal advice and/or be supported by a legal advisor at the hearing on matters of law and procedure.

9. Complaints about senior leaders, governance or the Trust

9.1 Complaints must be allocated to an appropriate person without prior involvement. They should not be sent directly to individual governors or trustees who may later be required to consider them.

9.2 The governance professional will confirm the case-specific investigator and preserve an eligible Stage 3 panel.

9.3 The following routes apply unless the Trust's Scheme of Delegation requires an equivalent, more independent arrangement:

Subject of complaint	Send complaint to / Stage 2 route
School staff	Headteacher, using section 6
Headteacher, executive headteacher or head of school	Local governance professional via the school office; uninvolved LGB chair/governor or independent investigator
Individual LGB governor or chair	Local governance professional; uninvolved governor or trustee/independent investigator
Whole LGB or its governance professional	Trust governance professional; uninvolved trustee or external investigator
CEO	Trust governance professional; uninvolved trustee or external investigator
Individual trustee or Trust member	Chair of Trustees via Trust governance professional; uninvolved trustee or independent investigator
Chair of Trustees or whole Trust Board	Trust governance professional; independent investigator arranged on behalf of the Trust (tgp@keysacademytrust.org)
Trust governance professional	Email enquiries@keysacademytrust.org

9.4 Where the complaint concerns the CEO, Trust Board or an entire local governing body, the Trust will decide and communicate a suitable independent formal investigation and hearing route.

9.5 No person who investigated at Stage 2 will sit on the Stage 3 committee.

9.6 The Trust's central correspondence route is tgp@keysacademytrust.org; if there is a complaint about the Trust governance professional, this should be directed to the CEO.

10. Concerns and complaints from other persons

10.1 TKAT will respond respectfully and promptly to concerns from individuals who are not parents of current pupils. This section is a discretionary route and does not replace the statutory parent procedure.

Stage A

10.2 Raise a concern with an appropriate school staff member.

10.3 A response will normally be provided within 5 school days.

Stage B

10.4 Submit a formal written complaint to the headteacher or, for central Trust matters or complaints about the headteacher, the Trust governance professional.

10.5 A response will normally be given within 15 school days.

Stage C

10.6 Request a review within 15 school days of the Stage 2 outcome through the local governance professional or Trust governance professional as appropriate.

10.7 An uninvolved governor or trustee will normally review the matter and respond within 15 school days.

10.8 The Trust may instead convene a committee under section 6 where justified. The outcome concludes this discretionary route.

10.9 The relevant contact will explain any alternative route, timescale extension or limitations on information that can be disclosed. External routes may exist depending on the subject matter; a DfE referral does not guarantee that the Department will investigate a non-parent complaint.

11. Repeated/vexatious complaints and/or complaints pursued in an otherwise unreasonable manner

11.1 TKAT distinguishes the merits of a complaint from the behaviour of the complainant. A complaint will not be rejected simply because it is persistent, strongly expressed, lengthy or critical of a school/the Trust. However, there are rare circumstances where we will deviate from the complaints procedures set out in this policy. These include, but are not necessarily limited to, the aspects outlined in this section.

Repetitious, including serial and/or persistent, complaints

11.2 Where the complainant's complaint is the same, similar to, or based on the same facts of a complaint which has already been considered in full and we have:

a) Taken every reasonable step to address the complainant's concerns; and
b) Given the complainant a clear statement of our position and their options.

11.3 Where the same matter has completed the full procedure and no material new information is provided, the Trust may explain that its internal process is exhausted and may decline to repeat substantive responses. The complainant will be referred to Stage 4/D (the section about 'Further escalation after internal completion').

Vexatious complaints

11.4 The Office of the Independent Adjudicator defines the characteristics of a 'frivolous' or 'vexatious' complaint as any one or more of the following:

a) Complaints which are obsessive, persistent, harassing, prolific or repetitious.
b) Insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason.
c) Insistence upon pursuing meritorious complaints in an unreasonable manner.
d) Complaints which are designed to cause disruption or annoyance.
e) Demands for redress that lack any serious purpose or value.
f) Examples include but are not limited to:
g) Refusal to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance.
h) Refusal to co-operate with the complaint's investigation process.
i) Refusal to accept that certain issues are not within the scope of the complaints procedure.

j) Insistence on the complaint being dealt with in ways which are incompatible with the complaint's procedure or with good practice.
k) Introducing trivial or irrelevant information which they expect to be taken into account and commented on.
l) Raising large numbers of detailed but unimportant questions, and insist they are fully answered, often immediately and to their own timescales.
m) Making unjustified complaints about staff who are trying to deal with the issues and seeks to have them replaced.
n) Changing the basis of the complaint as the investigation proceeds.
o) Seeking an unrealistic outcome, such as the inappropriate dismissal of staff.
p) Making excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.
q) Knowingly providing falsified information.
r) Publishing unacceptable information on social media or other public forums.

Complaints pursued in an otherwise unreasonable manner

11.5 Where the complainant's behaviour or language towards staff, governors, trustees or members is aggressive, abusive, offensive, discriminatory or threatening or insulting personal comments are made about, or threats are made towards, staff.

11.6 In the circumstances outlined in above, we may act in one of the following ways:

a) Inform the complainant that we consider their complaint to be vexatious or the manner in which they are pursuing their complaint to be unreasonable and why and ask them to desist.
b) Conduct the complaints committee on the papers only, i.e. not hold a hearing.
c) Refuse to consider the complaint any further and refer the complainant directly to Stage 4/D (the section about 'Further escalation after internal completion').

AI-generated or automated complaints

11.7 The school recognises that artificial intelligence and other automated tools may be used to assist in preparing correspondence and complaints. However, complaints generated, replicated or submitted through automated systems may be considered unreasonable where their volume, frequency or nature places a disproportionate burden on staff or seeks to repeatedly revisit matters that have already been fully considered.

11.8 Examples of this may include the following:

a) Submitting multiple versions of the same complaint with little or no new information.
b) Sending excessively lengthy or repetitive correspondence that hinders effective complaint resolution.
c) Repeatedly challenging decisions or outcomes that have already been addressed through the school's complaints procedure.
d) Using automated systems to generate high volumes of correspondence on the same issue, or one correspondence that is unnecessarily long or difficult to identify the specific complaints.

11.9 Where this occurs, the school may request that concerns are summarised concisely and submitted in a single, succinct communication. TKAT and its schools reserve the right not to respond to duplicated, repetitive or excessive correspondence where the matters raised have already been considered and addressed in accordance with the complaints procedure.

Restricting communication

11.10 Before restricting communication, TKAT will normally explain the specific behaviour, request a change, consider disability-related or other accessibility needs, and give written notice of any proportionate restrictions, duration, review date and contact route.

11.11 Restrictions may include a named contact, reasonable limits on frequency or a requirement for written communication; they will not automatically remove a parent's right to complete the statutory complaint stages or attend and be accompanied at a panel hearing.

11.12 Where there is an immediate threat to safety, TKAT may contact the police or take appropriate protective action without prior warning. Any restriction on access to premises will be considered separately and lawfully.

12. Complaint campaigns

12.1 Where three or more separate complainants raise substantially the same issue, TKAT may use coordinated administration, a common factual response or a published response, provided personal information is protected and individual material differences are considered.

12.2 The Trust will explain how any individual parent's statutory stages and panel hearing entitlement can still be exercised. A campaign response is not, by itself, a reason to deny those rights.

13. Records, confidentiality and monitoring

13.1 TKAT will maintain written records of formal complaints, whether resolved at Stage 2 or Stage 3 / Stage B or C, their outcomes and actions taken, regardless of whether upheld.

13.2 Significant informal concerns will be recorded appropriately. Records, statements and correspondence will be kept confidential except where disclosure is required by law, by the Secretary of State, in connection with inspection or pursuant to a valid information right.

13.3 Records will be held in accordance with Trust retention and data protection arrangements.

13.4 Stage 3 findings and recommendations will be provided to the complainant and, where relevant, the person complained about, and made available for inspection on the school premises by the Trust and headteacher.

13.5 The Trust Board or LGBs may, if there are enough complaints to warrant investigation, monitor anonymised themes and actions to identify improvements without disclosing unnecessary personal information.

14. Further escalation after internal completion (Stage 4/D)

14.1 A complainant dissatisfied after the final internal stage (either Stage 3 or C) may refer concerns about compliance with the complaints procedure to the Department for Education.

14.2 The DfE does not ordinarily rehear the merits of the complaint or overturn the committee's decision; its role includes checking whether the academy has an appropriate procedure and has followed it. Information: https://www.gov.uk/government/publications/complain-about-an-academy/complain-about-an-academy.

14.3 Immediate safeguarding concerns should be reported through safeguarding channels and must not await completion of this procedure.

Appendix 1: Matters normally handed under other arrangements/policies

Matter	Relevant route / qualification
Admissions and admission appeals	Published admission arrangements and statutory admission appeal process.
Suspension and permanent exclusion	Statutory suspension/exclusion review and appeal arrangements.
SEND and EHC plan decisions	Relevant SEND disagreement-resolution, mediation or tribunal routes; ordinary service complaints may still fall within this policy.
Safeguarding and child protection	School safeguarding policy, DSL, local authority or police as appropriate; do not delay urgent referrals.
Staff grievance, employment disputes and whistleblowing	Trust grievance, employment or whistleblowing procedures.
Staff conduct	May be investigated under employment procedures; a parent's service complaint may still require an appropriate response.
Data protection and information rights	Trust DPO / relevant privacy and information rights processes, with ICO escalation where applicable.
National Curriculum content or statutory policy matters	DfE or relevant statutory process where applicable; concerns about delivery by the school may be considered here.
Third-party services on school premises	Provider's procedure where appropriate; TKAT will clarify any Trust responsibility.
Legal proceedings	Case-specific decision on overlap or temporary pause; not an automatic exclusion.

Appendix 2 - Guidance on what to include in a complaint

To ensure your complaint can be responded to effectively, ensure you include the following:

1. Your name.
2. Your child's name (if you are a parent).
3. Your relationship to the pupil.
4. Your address and postcode.
5. Your contact details (an email address is essential, and most often a daytime and evening telephone number).
6. What your complaint is:
    a. Use your own words, and not AI).
    b. If you have more than one complaint, please number the complaints.
    c. Please summarise your complaint (limit to 200 characters). If you wish to provide further details, please attach a separate letter describing your complaint in full, along with any supporting evidence.
7. What action have you already taken to try and resolve your complaint/s in accordance with Stage 1 of the school's complaints procedure?
    a. This includes identifying who you spoke to and what was the response?
8. Explain what you would like as an outcome from your complaint/s.
9. Attach any paperwork or evidence you have.
10. Sign off and date your complaint.

All functions of the complaints procedure must adhere to the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000. Please complete and return to the school office in a sealed envelope addressed to the headteacher, Clerk of the local governing body or Clerk of the trustees (as appropriate).

Appendix 3: Complaints at a glance

Parents of current pupils	Other complainants
Stage 1: Informal concern; aim to resolve within 15 school days	**Stage A:** Informal concern; normally respond within 5 school days
Stage 2: Written formal complaint; acknowledge within 5, respond normally within 15 school days	**Stage B:** Written complaint; normally respond within 15 school days
Stage 3: Request within 15 school days; panel of 3+, including independent member; hearing aimed within 20 school days; outcome within 5 school days	**Stage C:** Request within 15 school days; governor/trustee review normally within 15 school days, or panel where appropriate
Internal procedure ends after Stage 3; DfE may consider procedural compliance	Internal route ends after Stage 3; external remit depends on complaint

Appendix 4: Who receives my complaint?

Complaint about…	Who receives the complaint?
School staff (not headteacher)	Headteacher
Head of School	Executive Headteacher
Headteacher	Local governance professional, via their email (see each school's website)
Whole LGB, the CEO, Trust Board or a central Trust matter	Trust governance professional (tgp@keysacademytrust.org)
Trust governance professional	Email enquiries@keysacademytrust.org

Appendix 5: Complaints committee hearing protocol

The process is as follows:

a) The chair introduces the members, confirms independence, explains the remit and establishes ground rules and reasonable adjustments.
b) The complainant explains their complaint and may be asked questions by the school representative and committee.
c) The school representative explains the response and may be questioned by the complainant and committee.
d) Both parties have a fair opportunity to clarify evidence, respond and summarise their positions.
e) Witnesses or further written evidence may be considered where relevant and procedurally fair. New unrelated complaints are referred to the appropriate earlier stage.
f) The committee may adjourn for necessary evidence or accessibility reasons and will provide a revised timetable.
g) The parties withdraw; the committee deliberates privately with procedural advice from the governance professional as appropriate.
h) A written, reasoned outcome and recommendations are normally issued within 10 school days.

The panel may vary the order of proceedings to ensure fairness, including separate participation where necessary. If a complainant cannot attend, the Trust will consider an alternative date, reasonable adjustments and written submissions.

A parent's right to attend and be accompanied will not be removed solely because the Trust finds written determination more convenient. Audio recording requires appropriate agreement and lawful handling.