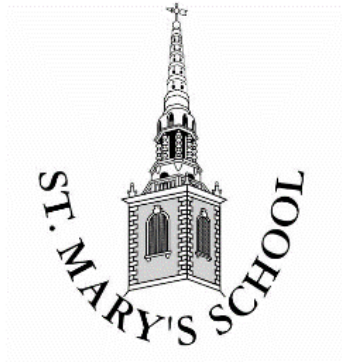




Complaints Policy

Policy Agreed: 23rd September 2026

Review date: Autumn 2027

(Interim) Executive Head Teacher: Anthony David

Chair of Governors: Rebecca Shilling

We believe that everyone is precious and loved by God. We aspire to let our light shine in all that we do. We nurture and empower one another to flourish. Together we shine in our world by showing compassion and by serving others. Let God's light shine through us.

Our vision

We believe that everyone is precious and loved by God.

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Status of this document

This is the statutory Complaints Policy of St Mary's CofE Primary School, made under section 29(1) of the Education Act 2002 and informed by the DfE's 'Best practice guidance for school complaints procedures 2020'. The Governing Body is required to establish and publish a procedure for dealing with complaints about the school or its community provision. This policy is published on the school website and is available in hard copy on request from the school office, in alternative formats on request (large print, audio, plain English summary), and with interpreter support where indicated. The policy is reviewed annually by the Governing Body.

1. Vision, Aims and Principles

1.1 Our vision

St Mary's is a Church of England primary school and a UNICEF UK Rights Respecting School. Our vision shapes how we receive complaints — just as it shapes everything else we do:

We believe that everyone is precious and loved by God. We aspire to let our light shine in all that we do. We nurture and empower one another to flourish. Together we shine in our world by showing compassion and by serving others. Let God's light shine through us.

A complaint is, at root, a relationship under strain. Someone in our community — a parent, a carer, a pupil, a neighbour, a member of the public — believes something has gone wrong, and is asking us to listen. The Christian conviction that every person is precious means we receive every complaint with respect, regardless of whether we ultimately agree with it. The Rights Respecting framework means we treat the complainant with dignity, give children their voice when they are affected, and approach the matter with fairness.

This is not a soft document. It sets clear procedures, clear timescales, and clear consequences when behaviour becomes unreasonable or threatening. But it is anchored in care, and it starts from the assumption that most concerns can be resolved early through good conversation — if both sides bring goodwill to the work.

1.2 Aims

This policy aims to:

- Provide a clear, accessible, fair procedure for raising and resolving concerns and complaints
- Encourage early, informal resolution wherever possible, in keeping with the school's partnership with families

- Set out formal stages where informal resolution does not succeed, with clear timescales and procedural fairness at every stage
- Establish boundaries on conduct — protecting staff from abuse, harassment, or threats; protecting pupils from being drawn into adult disputes; and setting expectations about social media and AI-generated communications
- Comply with the school's statutory duty under section 29(1) of the Education Act 2002 and have regard to the DfE's Best Practice Guidance for School Complaints Procedures 2020
- Support the school's wider commitments under the Equality Act 2010, the UK GDPR / Data Protection Act 2018, and Keeping Children Safe in Education 2026
- Support continuous improvement — every concern is information the school can learn from

1.3 Principles

This policy operates on seven principles:

1. Listen first.

Every concern is heard. The starting question is 'what has happened?', not 'how do we defend ourselves?'. Most concerns are best resolved by a good conversation early.

2. Early and informal where possible.

We aim to resolve concerns informally wherever it can be done well. Formal procedures are not a sign that the school is failing — but they are not the first response to every concern.

3. Fair, transparent, proportionate.

Procedures are public, timescales are clear, and the response is proportionate to the complaint. The complainant and any staff member who is the subject of the complaint are both treated fairly.

4. Dignity for everyone.

The complainant is treated with respect, even when their complaint is not upheld. Staff are treated with respect, even when complaints are made against them. Pupils are treated with care when they are connected to a complaint. No one in our community is required to tolerate abuse, harassment, or threats.

5. Children's voice.

Where a complaint concerns or affects a child, we hear that child's voice in a way appropriate to their age and understanding. Children also have a right to raise concerns themselves.

6. Confidentiality and data protection.

Complaints are handled confidentially. Personal information is processed in line with UK GDPR and the school's Data Protection Policy. The complainant's details are not shared beyond those who need them; the same applies to staff and pupils named in complaints.

7. Learning, not just resolution.

Every complaint is reviewed for what the school can learn. Patterns are tracked. Improvements are made. A school that handles complaints well is a school that gets better over time.

1.4 Children's voice and rights

UN Convention on the Rights of the Child — Article 12: Respect for the views of the child

States Parties shall assure to the child who is capable of forming their own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.

At St Mary's, children's voice in complaints matters in two distinct ways:

- ****Children as complainants.**** A child who believes they have been treated unfairly may raise their concern with any trusted adult — their class teacher, the SENCO, the Headteacher, the office team, or through the school's Worry Boxes and pupil voice mechanisms. Children's concerns are taken seriously and addressed at an age-appropriate level. Where appropriate, the school will work with the child's family on the matter; in safeguarding contexts, the procedures of the Child Protection and Safeguarding Policy 2026–27 apply
- ****Children as the subject or witness in adult complaints.**** Where a complaint by an adult concerns or describes a child, the school will hear that child's voice on the matter, in an age-appropriate way, before reaching conclusions. Children's views are given due weight relative to age, understanding, and the seriousness of the matter. Where pupils are spoken to about a complaint, a trusted adult (usually a parent or carer, or where that is not appropriate, another member of staff with whom the child is comfortable) will be present

2. Statutory and Legal Framework

2.1 The duty to have a complaints procedure

Section 29(1), Education Act 2002

The governing body of a maintained school in England shall establish procedures for dealing with all complaints relating to the school or to the provision of facilities or services under section 27, other than complaints falling to be dealt with in accordance with any procedures required to be established in relation to the school by virtue of a statutory provision other than this section.

This is the foundational statutory duty under which this policy is made. Under section 29(2), governing bodies must 'have regard to any guidance given from time to time' by the Secretary

of State — currently the DfE’s Best Practice Guidance for School Complaints Procedures 2020 (last updated 15 January 2021).

2.2 Wider statutory framework

- ****Education Act 2002, s.29**** — duty to establish complaints procedures (above)
- ****Education Act 1996, ss.496 and 497**** — powers of the Secretary of State to give directions where a school or governing body acts unreasonably or fails to discharge duties
- ****School Standards and Framework Act 1998, s.94**** — specific complaints about collective worship and religious education go to the LA
- ****Equality Act 2010**** — protection from discrimination on grounds of any protected characteristic; the Public Sector Equality Duty (s.149); reasonable adjustments for disabled complainants (s.20)
- ****Human Rights Act 1998**** — in particular Article 6 (fair hearing) and Article 8 (private and family life)
- ****UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025**** — handling of personal data in complaints; right to information; data minimisation; retention
- ****Freedom of Information Act 2000**** — where complainants make FOI requests, separate procedures apply
- ****Education Act 2002, s.175**** — safeguarding duties relevant where complaints raise safeguarding concerns
- ****Keeping Children Safe in Education 2026**** — procedures for complaints raising child protection issues
- ****Defamation Act 2013**** — relevant where complaints are published publicly in ways that may be defamatory
- ****Malicious Communications Act 1988 and Communications Act 2003**** — relevant where communications cross into threats or abuse
- ****Worker Protection (Amendment of Equality Act 2010) Act 2023**** — duty to protect staff from harassment, including by third parties

2.3 Definitions

Term	Definition (DfE Best Practice Guidance 2020)
Concern	An expression of worry or doubt over an issue considered to be important, for which reassurances are sought
Complaint	An expression of dissatisfaction however made, about actions taken or a lack of action by the school

In practice, the line between a concern and a complaint can be blurred. The school treats both seriously. A concern is normally addressed informally, in conversation. A complaint, particularly when made in writing, normally engages the formal stages of this policy.

2.4 Who can make a complaint

- Parents and carers of pupils currently on roll
- Pupils themselves (in age-appropriate form)

- Prospective parents and applicants (where the complaint relates to the school's actions toward them)
- Former pupils and former parents (within reasonable time limits — see Section 4.5)
- Members of the public (the duty under s.29 EA 2002 extends to any complaint relating to community facilities or services provided by the school)
- Neighbours of the school
- Members of the school workforce — noting that staff complaints about the school as employer are handled under the school's Grievance Policy, not this policy; staff complaints relating to safeguarding follow KCSIE 2026 routes

2.5 What this policy does not cover

Some matters are dealt with under specific statutory or other procedures, not this policy. Where one of these applies, the school will direct the complainant to the right route:

Matter	Procedure	Where to direct
School admissions	Statutory admissions appeals	Islington Council Admissions and the school's Admissions Policy; for VA schools, the Governing Body as admissions authority
Statutory assessments of SEND / EHCP	SEND Code of Practice 2015 and Children and Families Act 2014 disagreement resolution and SEND Tribunal	Islington SEND Service; SENDIASS; First-tier Tribunal (SEND)
Exclusion of pupils	Statutory exclusion review procedure	See Suspension and Permanent Exclusion Policy 2026–27
Child protection concerns	Safeguarding procedures under KCSIE 2026	Designated Safeguarding Lead; Islington MASH; LADO for staff allegations
Staff grievances	Internal Grievance Policy	School HR
Staff conduct	Internal Disciplinary Policy	School HR; outcomes not shared with complainant
Whistleblowing	Internal Whistleblowing Policy / Public Interest Disclosure Act 1998	Internal route or, for education matters, Secretary of State as prescribed person via www.gov.uk/contact-dfe
Collective worship and RE	School Standards and Framework Act 1998, s.94	Islington Council in the first instance
National Curriculum content	Direct to the Secretary of State	www.gov.uk/contact-dfe
Services on school premises by other providers (e.g. wraparound, clubs run by external providers)	Provider's own complaints procedure	The provider directly

Data subject access requests / GDPR concerns	Data Protection Policy 2026–27 and ICO complaints	Data Protection Officer (Claire Mahegan); ICO
Freedom of Information requests	FOI Act 2000 procedure	Headteacher / FOI lead

3. The Complaints Procedure at a Glance

The procedure has three stages — an informal stage and two formal stages — with a possible post-school stage if dissatisfaction remains:

Stage at a glance

INFORMAL STAGE — Speak to the class teacher (or relevant staff member) at the earliest opportunity. Most concerns are resolved here.

STAGE 1 (formal) — Written complaint to the Headteacher (or to the Chair of Governors where the complaint is about the Headteacher). Acknowledged within 3 working days; response within 15 working days.

STAGE 2 (formal) — Review by a panel of governors who have not previously been involved. Convened within 20 working days; written outcome within 5 school days of the panel meeting.

POST-SCHOOL — Request that the Department for Education review whether the school followed its own procedure (DfE does not normally reinvestigate the substance).

4. Informal Stage

4.1 The principle

Most concerns are best raised early and informally with the person closest to the issue. A conversation with the class teacher about a child's learning, with the SENCO about specific support, with the office team about administrative matters, or with the Headteacher about wider concerns, often resolves the matter without need for formal procedure. We actively encourage this approach.

4.2 How to raise an informal concern

- ****Speak to the class teacher**** — either at the end of the school day (briefly), or by arranging a longer conversation through the school office. The class teacher is the first point of contact for matters relating to the child's learning, behaviour, or daily school experience
- ****Speak to the SENCO (Lucy Courtney-Diggins, 020 7359 1870)**** — for matters relating to SEND, reasonable adjustments, or specific support
- ****Speak to a senior leader or the Headteacher**** — for matters that extend beyond the class teacher's remit, or where the concern relates to the class teacher themselves
- ****Speak to the school office**** — for administrative matters, or to be directed to the right person

- Communications can be by phone call, Class Dojo message, email, letter, or in person at the school gate / by appointment

4.3 Response at the informal stage

- The school will normally respond within 5 working days, by arranging a meeting, phone call, or written response
- Where matters are urgent (e.g. safeguarding, immediate welfare), response is the same day
- The person handling the concern will make a note of the conversation and any actions agreed
- Where actions are agreed, these will be communicated back to the complainant, typically in writing for the avoidance of doubt
- Where the matter is followed up over time, the school will provide updates

4.4 If the informal stage does not resolve the matter

If the complainant is not satisfied with the response at the informal stage, they may proceed to Stage 1 of the formal procedure. The school will tell the complainant how to do this, and provide a copy of this policy and the Complaint Form (Appendix B) on request.

4.5 Time limits

- Complaints should normally be raised within **3 months of the incident or issue**
- Complaints raised beyond this time may not be considered, unless there are exceptional circumstances
- Where a complainant has been engaged in another process (e.g. statutory exclusion review, SEND tribunal), the 3-month limit runs from the conclusion of that process for any aspects not covered by that route
- Annual matters (e.g. termly events, specific lessons) should be raised in the term they arise

5. Stage 1 — Formal Complaint to the Headteacher

5.1 How to make a Stage 1 complaint

- Submit the complaint in writing using the Complaint Form (Appendix B), or by letter or email to the school office marked 'For the attention of the Headteacher'
- Where the complaint is about the Headteacher personally, address it to the school office marked 'For the attention of the Chair of Governors'
- Where the complaint is about a Governor or the Chair of Governors, address it to the school office marked 'For the attention of the Vice-Chair of Governors'; complaints about the Vice-Chair go to the Diocesan Director of Education (London Diocesan Board for Schools — LDBS)
- State clearly the nature of the complaint, what has happened so far, and what outcome the complainant is seeking

5.2 The Headteacher's response

- ****Acknowledgement within 3 working days**** — by letter or email, with a copy of this policy
- ****Investigation**** — the Headteacher (or designated investigating officer) gathers facts: meeting with the complainant if appropriate, speaking to staff involved, speaking to pupils where relevant (with a parent / carer or other trusted adult present — see Section 1.4), reviewing records and documents
- ****Meeting offered**** — the complainant will be invited to a meeting to discuss the complaint if helpful. The complainant may be accompanied by a friend, relative, or representative (not normally a legal representative — see Section 12)
- ****Written response within 15 working days**** of acknowledgement. Where additional time is needed, the school will write to explain why and give a revised timescale (normally no more than a further 10 working days)
- ****Outcomes**** — the response sets out the school's findings on each point of complaint (upheld, partially upheld, not upheld), the reasons for those findings, and any actions the school will take
- ****Escalation**** — the response explains how to escalate to Stage 2 if the complainant remains dissatisfied

5.3 Confidentiality at Stage 1

- The complaint, its content, and the investigation are handled confidentially
- Staff named in the complaint are informed and given opportunity to respond, in line with their procedural rights
- Pupils named in the complaint are protected from inappropriate exposure; pupil voice is sought sensitively
- Records of the complaint are held securely and separately from pupil records (see Section 11)

5.4 Complaints about the Headteacher

- Complaints about the Headteacher are investigated by the Chair of Governors (or, where the Chair is unavailable, the Vice-Chair) in place of the Headteacher
- The Chair may seek HR or LDBS advice in conducting the investigation
- The Chair may delegate the investigation to an independent investigator where appropriate, particularly for complaints involving serious allegations
- All other procedural elements of Stage 1 apply, with the Chair playing the Headteacher's role

5.5 Closure at Stage 1

The Headteacher (or Chair for Headteacher complaints) may, in some circumstances, decide that the school has done all it reasonably can to resolve the complaint at Stage 1, and may close the complaint at that point. The complainant retains the right to escalate to Stage 2 if they wish; the closure relates to further investigation at Stage 1, not to the complainant's wider procedural rights.

6. Stage 2 — Governors' Complaints Appeal Panel

6.1 When Stage 2 applies

If the complainant is not satisfied with the Stage 1 outcome, they may request Stage 2 — a review by a panel of governors who have had no prior involvement with the complaint. Stage 2 is not a rehearing of the complaint; it is a review of how the complaint has been investigated and whether the outcome reached was reasonable on the evidence.

6.2 Requesting Stage 2

- Request in writing to the Chair of Governors via the school office, within **10 working days** of receiving the Stage 1 outcome letter
- Set out the grounds for requesting Stage 2 — in particular, what aspects of the Stage 1 investigation or outcome the complainant believes were flawed, unfair, or inadequate
- Submit any additional evidence the complainant wishes the panel to consider

6.3 The panel

- Three governors who have had no prior involvement with the complaint
- Where it is not possible to find three uninvolved governors, the school may co-opt an independent panel member — typically a governor from another school or LDBS school — in line with DfE Best Practice Guidance 2020
- The panel is supported by a clerk, who arranges the meeting, takes minutes, and ensures procedural fairness
- Panel members will declare any interest or prior knowledge before the meeting; where this affects impartiality, an alternative panel member is found

6.4 Convening the panel

- The panel will normally meet within **20 working days** of the Stage 2 request being received
- The complainant will be given **at least 5 working days' notice** of the meeting date, time and location
- Written documentation — the complaint, Stage 1 investigation outcome, any additional evidence — is circulated to the panel and to the complainant at least 5 working days in advance
- The complainant may attend with one companion (friend, family member, advocate, or where appropriate a trade union representative if they are a parent who works at the school in a different role)
- The Headteacher (or person who conducted Stage 1) is normally present to explain the Stage 1 investigation
- Witnesses may attend by agreement of the panel chair, particularly where new factual matters are raised
- The panel meeting is normally held at the school; alternative arrangements (off-site, online via secure video conference) can be made if helpful

6.5 Conduct of the panel meeting

The panel chair leads the meeting with attention to fairness, dignity, and clarity. The meeting will typically include:

1. Opening by the chair, introductions, explanation of the process
2. The complainant presents their case — what they say went wrong with the Stage 1 investigation or outcome
3. The Headteacher (or Stage 1 investigator) explains the Stage 1 investigation and outcome
4. The panel asks questions of both parties
5. Both parties have the opportunity to ask questions of each other, through the chair
6. Both parties make a closing statement
7. The chair closes the meeting; both parties leave; the panel deliberates in private

New evidence not previously disclosed should not normally be introduced at the meeting; if either party wishes to introduce new evidence, the chair may adjourn to give the other party a fair opportunity to consider and respond.

6.6 Panel decisions

The panel may:

- Dismiss the complaint in whole or in part
- Uphold the complaint in whole or in part
- Recommend specific actions the school should take, including changes to policies or procedures, apologies, or remedies for the complainant
- Find that the Stage 1 investigation was inadequate and direct that further investigation be carried out

The panel cannot:

- Discipline individual staff (this is a matter for the Headteacher and governing body through separate procedures)
- Award financial compensation
- Make decisions that conflict with statutory duties (e.g. on admissions, exclusions, SEND assessments)
- Overturn matters that are within the lawful discretion of the school

6.7 Written outcome

- The panel's decision is communicated in writing within ****5 school days**** of the meeting
- The letter sets out the panel's findings, the reasons, and any actions or recommendations
- The letter explains how to escalate to the Department for Education if the complainant remains dissatisfied

6.8 Minutes of the meeting

- The clerk takes minutes of the meeting

- Minutes are the property of the Governing Body and are held confidentially
- A copy of the minutes may be shared with the complainant on request, with personal information about other named individuals appropriately redacted; this decision sits with the panel chair
- Recording of meetings (by either party) is not permitted without prior agreement; covert recording will not be accepted as evidence in subsequent processes

7. After Stage 2 — the Department for Education

If the complainant remains dissatisfied after Stage 2, they may write to the Department for Education to ask the DfE to consider whether the school followed its own complaints procedure. The DfE does not normally re-investigate the substance of the complaint or overturn decisions reached by the school. Its role is to consider whether the school adhered to its own policy and to relevant statutory and legal frameworks.

Department for Education

School Complaints Unit
Department for Education
Piccadilly Gate
Store Street
Manchester M1 2WD

Online complaint form: www.gov.uk/complain-about-school

In certain circumstances, complaints may also be made to:

- ****Ofsted**** — where complaints concern matters Ofsted may consider when deciding to inspect a school. Ofsted does not investigate individual complaints but may use them as intelligence in inspection planning. www.gov.uk/complain-about-school
- ****Local Government and Social Care Ombudsman (LGSCO)**** — for complaints about Islington Council functions affecting the school (e.g. admissions, transport, certain SEND matters)
- ****Information Commissioner's Office (ICO)**** — for complaints about how personal data has been handled. Note: from 19 June 2026, complaints to the ICO must normally be made within 6 months of the relevant event under the Data (Use and Access) Act 2025
- ****LADO (Local Authority Designated Officer)**** — for complaints involving allegations against staff that meet the safeguarding threshold
- ****London Diocesan Board for Schools (LDBS)**** — for complaints relating to the school's Christian distinctiveness, RE, collective worship, or governance, where the LDBS has a role

8. Social Media and Public Communication

8.1 The principle

Complaints are resolved through direct, confidential conversation between the complainant and the school. They are not resolved through social media, WhatsApp groups, Google Classroom, parent Facebook groups, public posts, or other public channels.

There are good reasons for this:

- Public commentary often involves only part of the picture and can be unfair to those involved
- Staff named on social media have a right not to be identified publicly in a way that may be defamatory, harassing, or distressing
- Pupils named on social media are particularly vulnerable to harm
- Public airing can entrench positions and make resolution harder
- Other parents and members of the community can be drawn into matters that are not their own
- Confidentiality — a core principle of the complaints procedure — cannot be maintained when one party is also communicating publicly

8.2 What we ask

Our request

While a concern or complaint is being addressed, please raise it with the school directly through the channels in this policy, and not on social media, in messaging apps, on Google Classroom, or in other public forums. We will treat your complaint with confidentiality, and we ask you to do the same. This applies to the substance of the complaint and to any communications about the school's handling of it.

8.3 Google Classroom

Google Classroom is set up specifically as a learning tool to support pupils' education. It is not a complaints channel. Queries or concerns that go beyond learning should be raised with the class teacher directly, through the school office, or via Class Dojo. Posts on Google Classroom raising complaints or concerns will not be treated as a formal complaint under this policy — and will be redirected to the right channel.

8.4 If social media is used

The school takes a graduated approach where social media or other public forums are used in connection with a complaint:

8. ****First, a conversation.**** The Headteacher or Chair of Governors will speak with the complainant, asking that public communications cease while the complaint is being addressed
9. ****Second, a written request.**** If public communications continue, the school will write to the complainant setting out the request more formally and explaining the implications
10. ****Third, proportionate action.**** Where public communications persist and contain matters affecting the school's ability to resolve the complaint, the school may:

- Pause the complaints investigation until the public communications cease
 - Limit the complainant's communications with the school to a specified channel and named contact
 - In serious cases involving defamatory content, harassment, or threats — take legal advice and consider whether to seek removal of content, refer to the police, or pursue civil remedies
11. ****Fourth, in extreme cases.**** Where public communications include serious harassment, defamation, or threats, the school may close the complaint, restrict the complainant's contact, or in the most extreme cases bar the individual from school premises

This approach is proportionate, not absolute. The school does not refuse to address a genuine complaint simply because of a single related social media post; but persistent public communication that undermines confidentiality, defames staff or pupils, or escalates the matter beyond what good faith engagement requires, will be met with proportionate response.

8.5 Defamation, harassment, and serious matters

Communications — whether on social media, in messaging apps, in emails, or in person — that include any of the following are taken seriously and may be referred outside this complaints procedure:

- Defamatory statements about staff or pupils (Defamation Act 2013)
- Harassment, including a course of conduct intended to cause distress (Protection from Harassment Act 1997)
- Malicious communications, including statements intended to cause distress or anxiety (Malicious Communications Act 1988; Communications Act 2003 s.127)
- Threats of violence or threats to staff or pupils
- Hate speech or content targeting protected characteristics (Equality Act 2010; Public Order Act 1986)
- Images or recordings of staff or pupils published without consent, particularly involving children (UK GDPR; Data Protection Act 2018)

In such cases the school may, in addition to (or instead of) the complaints procedure, refer the matter to the police, seek legal advice, contact the relevant social media platform, or take action under its Safeguarding Policy. Staff are protected against third-party harassment under the Worker Protection (Amendment of Equality Act 2010) Act 2023.

9. AI-Generated and AI-Enhanced Complaints

9.1 The phenomenon

Increasingly, complaints sent to schools are drafted with, or substantially enhanced by, generative AI tools such as ChatGPT, Claude, Gemini, or Copilot. This is part of a wider pattern: research published in 2025 indicated that approximately half of school leaders had seen a significant increase in AI-enhanced complaints, and approximately three quarters reported that AI-generated complaints take longer to address because of their formal, legalistic tone and elevated complexity.

The school does not object to the use of AI per se. We use AI in our own work — see our Teaching and Learning AI Policy 2025–26 and our suite of AI Data Protection Impact Assessments. We recognise that AI can help people put their thoughts in order and express themselves more confidently, particularly where English is an additional language, where literacy is a barrier, or where the matter is emotionally difficult to articulate.

Our concern is not the use of AI. Our concern is the quality and accuracy of what is produced and submitted to us.

9.2 Our approach

AI-generated complaints: our approach

We will address every genuine concern raised, whether drafted by the complainant alone, with AI support, or in collaboration with another person. The use of AI does not invalidate a complaint.

However: the complainant remains responsible for everything submitted in their name. Where a complaint contains fabricated legal references, fictitious case citations, hallucinated procedural claims, references to legislation that does not exist or does not apply, or claims that are demonstrably false, the school will identify these, set them aside, and address only the substantive matter the complainant is raising.

9.3 What we will do

- ****Read every complaint with care**** — looking past the form to the substance. A child being upset, a misunderstanding, a perception of unfairness — these are real concerns that deserve a real response, however dressed up the language
- ****Identify the heart of the complaint.**** Where a complaint is lengthy and legalistic, we will distil it to its core questions and address those clearly
- ****Check legal references.**** Where a complaint cites legislation, regulations, or case law, we will check these. Citations that are inaccurate, irrelevant, or fabricated will be noted but not given weight
- ****Respond proportionately.**** Our response will address the substance of the complaint, not match the volume or tone of a lengthy AI-generated letter point by point
- ****Not be intimidated by legalistic framing.**** A letter using legal language is not the same as a legal action. The school does not require complainants to use legal language and we will not respond as if legal proceedings have been initiated unless they actually have been
- ****Not normally involve lawyers at school level.**** Per DfE Best Practice Guidance 2020, schools should not involve lawyers in complaints handling at the school stages. Legal involvement is reserved for genuinely legal matters — not for complaints framed legally
- ****Signpost early conversation.**** Where an AI-generated complaint reaches the school without informal contact having been tried, we will signpost the informal route and offer a conversation — most complaints are best resolved this way

9.4 What we ask of complainants using AI

- ****Read what you are sending.**** AI tools can produce plausible-sounding content that is partly or wholly incorrect. You remain responsible for what is submitted in your name
- ****Check legal references for accuracy.**** AI commonly fabricates citations — sometimes including American case law inapplicable to English schools, fictional regulations, or wrongly attributed quotations. Misattributed references undermine the complaint, not the school
- ****Keep the focus on the substance.**** A complaint of 30 pages with elaborate references is harder to address than a clear, concise statement of what happened and what outcome you are seeking
- ****Engage in conversation.**** AI cannot have a conversation with the school. A direct conversation often resolves matters that letters cannot
- ****Speak to a real adviser if needed.**** For genuinely complex matters, free advice services are available — see Appendix E. ParentKind, Citizens Advice, and SENDIASS (for SEND matters) are designed to help families navigate school concerns

9.5 Staff training

- Staff handling complaints receive training on identifying AI-generated content and responding proportionately
- The school monitors emerging guidance from DfE, sector legal advisers, and ParentKind on best practice in this area
- The Headteacher reports to governors annually on the volume and nature of complaints, including the proportion that appear AI-enhanced

10. Unreasonable, Persistent, and Vexatious Complaints

10.1 The principle

St Mary's is committed to addressing all genuine complaints fairly. We do not normally limit how complainants engage with us. However, we recognise three distinct patterns that can interfere with the school's ability to function and to serve all of its children:

Term	Meaning
Unreasonable behaviour	Behaviour, frequency, or pattern of contact that significantly hinders the school's ability to address the complaint or to continue its core work
Persistent contact	Repeated, voluminous contact about a complaint or related matters that has already been addressed through the procedures, particularly where no new evidence is being raised
Vexatious complaints	Complaints made with malicious intent, in bad faith, or designed to cause harm to the school, staff, or pupils, rather than to seek genuine resolution

10.2 What counts as unreasonable behaviour

Indicators that may, alone or together, lead the school to characterise behaviour as unreasonable include where the complainant:

- Refuses to articulate the complaint or specify what outcome they are seeking, despite assistance
- Refuses to co-operate with the complaints investigation process
- Refuses to accept that certain matters are outside the scope of the complaints procedure
- Insists on the complaint being dealt with in ways incompatible with the procedure or good practice
- Introduces volumes of trivial or irrelevant information and insists on full point-by-point response
- Raises large numbers of detailed but immaterial questions and insists they are all fully answered to their own timescales
- Makes unjustified complaints about the staff handling the complaint, seeking their replacement
- Changes the basis of the complaint as the investigation proceeds
- Repeatedly makes the same complaint after previous investigation has concluded it is unfounded or has been addressed
- Refuses to accept the findings of the complaints procedure where it has been fully and properly conducted, including any DfE review
- Seeks unrealistic outcomes (e.g. dismissal of named staff, compensation, public apology in specific form)
- Makes excessive demands on school time through frequent, lengthy, complicated, or multi-channel contact
- Uses threats or intimidation
- Uses abusive, offensive, discriminatory, or violent language or behaviour
- Knowingly provides false information
- Publishes information on social media or in other public forums in ways inconsistent with Section 8 of this policy
- Makes complaints anonymously while persistently following them up identifiably
- Submits multiple AI-generated complaints containing fabricated legal references after these have been identified

10.3 Vexatious complaints

Vexatious complaints are distinguished by malicious intent. Indicators include:

- Complaints clearly motivated by a desire to harm specific staff members rather than to address a genuine concern
- Complaints made shortly after, and apparently in retaliation for, school actions that the complainant disliked (e.g. a behaviour sanction for their child)
- Complaints that recycle the same matter through multiple formal procedures and external bodies in succession
- Complaints that knowingly contain false information, fabricated evidence, or impersonation
- Complaints accompanied by public campaigns of misinformation, intimidation, or harassment

Vexatious complaints are a small subset of complaints. Most complaints, even forcefully expressed, are not vexatious. The bar for treating a complaint as vexatious is high. Where the school does take this view, the reasons are documented and reviewed by the Chair of Governors before any action is taken.

10.4 What we will do

Where behaviour appears to be becoming unreasonable, persistent, or vexatious, the school takes a graduated approach:

12. **Conversation first.** The Headteacher (or Chair of Governors) will discuss the behaviour with the complainant informally, explaining the concern and asking them to change the relevant behaviour
13. **Written warning.** If behaviour does not change, the Headteacher will write to the complainant explaining that the behaviour is unreasonable, the impact it is having, and what the complainant needs to do differently
14. **Communication plan.** Where contact is causing significant disruption, the school may issue a communication plan: specifying a single named contact at the school, specifying allowed channels (e.g. email only, or written correspondence only), specifying frequency (e.g. one written contact per fortnight), and limiting topics to those still genuinely under investigation. The plan is reviewed after 6 months
15. **Restriction or closure of complaint.** Where the complaints procedure has been fully and properly followed and the complainant continues to raise the same matter, the school may close the complaint and decline further engagement on it. Future complaints from the same complainant on the same matter will not be accepted; complaints on new matters will be considered on their merits
16. **Site restrictions.** Where behaviour is threatening, abusive, or harassing, the school may bar the individual from the school site (with arrangements made for their child's school attendance via other arrangements, e.g. a different parent or carer brings the child to school)
17. **Police referral.** Serious incidents of aggression, threat, harassment, or violence are referred to the police, and the school may take further legal advice

10.5 Procedural safeguards

- Any decision to classify behaviour as unreasonable, persistent, or vexatious is made by the Headteacher in consultation with the Chair of Governors (or, where the Headteacher is implicated, by the Chair alone)
- The decision is recorded in writing with the specific reasons
- The complainant is notified in writing of the decision, the reasons, and any restrictions imposed
- The complainant has the right to appeal the classification to a panel of governors who have not previously been involved
- Classifications and restrictions are reviewed every 6 months
- A complainant whose behaviour has been classified as unreasonable does not lose the right to be heard on genuinely new matters or on safeguarding concerns
- The school does not classify a complaint as unreasonable simply because it is large, persistent, or framed legalistically; the test is whether the conduct of the complainant is interfering with the school's ability to function or to address the matter fairly

11. Confidentiality, Records, and Data Protection

11.1 Confidentiality

- Complaints are handled confidentially by those involved in addressing them
- Information about the complaint is shared on a need-to-know basis only — typically the Headteacher, the investigating officer, the staff member(s) named in the complaint, the Chair of Governors, the panel at Stage 2, and the HR provider if relevant
- Staff who are the subject of complaints are entitled to know the substance of the complaint and to respond to it
- Pupils named in complaints are protected from inappropriate exposure
- Complaint outcomes that involve staff disciplinary action are not normally shared in detail with the complainant; the complainant is informed that the matter has been addressed

11.2 Records

- All complaints are logged in the school's complaints register, maintained by the school office under the Headteacher's direction
- Records include: date received, complainant details, nature of complaint, stage reached, outcome, time taken, and any actions arising
- Complaint records are held securely, separately from pupil records and from staff personnel files
- Retention period: 7 years from final closure of the complaint (or longer where required by other law, e.g. safeguarding)
- The Headteacher reports annually to the Governing Body on complaint volumes, themes, outcomes, and lessons learned, in anonymised form
- Records may be reviewed by Ofsted, SIAMS inspectors, the LDBS, or the LA where they have a lawful basis for access

11.3 Data protection

Personal data processed during complaints handling is governed by UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025. The school processes this data under:

- Article 6(1)(c) UK GDPR — legal obligation (s.29 EA 2002)
- Article 6(1)(e) UK GDPR — public task / official authority
- Article 9(2)(g) UK GDPR where special category data is involved — substantial public interest, in line with Schedule 1 of the Data Protection Act 2018

Complainants and any data subjects named in complaints have the rights set out in the school's Data Protection Policy 2026–27 and Privacy Notices, including the right to access their personal data (Subject Access Request), the right to rectification, and the right to complain to the Information Commissioner's Office (ICO) within 6 months under the Data Use and Access Act 2025.

12. Reasonable Adjustments and Vulnerability

12.1 The principle

The complaints procedure must be accessible to everyone who has a right to use it. The school is committed to making reasonable adjustments to the procedure under section 20 of the Equality Act 2010 so that disabled complainants, complainants with mental health needs, complainants whose first language is not English, complainants with literacy needs, and complainants in other vulnerable circumstances are not placed at a substantial disadvantage.

12.2 Adjustments that may be made

- Documents provided in alternative formats (large print, audio, plain English, simplified summary, electronic format compatible with screen readers)
- Translation of correspondence into the complainant's preferred language; interpreter support at meetings
- Support to write out a complaint where literacy is a barrier — either by the school office (where the matter is not sensitive) or by a trusted third party (advocate, family member, ParentKind, Citizens Advice)
- Extended timescales where the complainant's circumstances require
- Choice of meeting venue, format (in-person, online, by phone), and timing
- Permission to be accompanied by an advocate, support worker, or trusted friend
- Break times during meetings; written follow-up of verbal discussions
- Sensitivity to mental health, trauma history, or other circumstances that may affect engagement with the process

12.3 Vulnerability considerations

The school is mindful that some complainants come to the process from a position of disadvantage — economic, social, cultural, or personal. This does not change the substance of how complaints are assessed, but it does inform how the school engages with the complainant. We approach every complainant with the assumption that they are doing their best with the resources available to them. Where the school can help by signposting external support, by adjusting the process, or by listening carefully to what is being said behind what is being said, we will.

12.4 Children making complaints

- Where a child is the complainant, the procedure is age-appropriate
- Children speak with a trusted adult — their class teacher, the SENCO, a senior leader — in the first instance
- Where the matter is significant, the child's parent or carer is normally informed (unless this would put the child at risk — see Child Protection and Safeguarding Policy 2026–27)
- Children are not put in the position of having to make formal written complaints or attend formal panel meetings on their own; the school works with the family to resolve concerns
- Children have access to Worry Boxes, the pupil council, the SENCO, and trusted staff as routes for raising concerns

13. Anonymous Complaints

Anonymous complaints — complaints where the school cannot identify the complainant — are handled with care:

- ****Safeguarding concerns**** raised anonymously are always taken seriously, in line with the Child Protection and Safeguarding Policy 2026–27
- ****Serious allegations**** — e.g. of staff misconduct — raised anonymously are referred to the Chair of Governors and may be investigated where there is sufficient information to do so
- ****Other anonymous complaints**** are recorded and considered, but the school may decide not to investigate where investigation is not possible without identifying the complainant
- Where an anonymous complaint reveals a wider issue that the school can address, action will be taken on the substance even where the original complainant cannot be contacted with the outcome
- The school does not encourage anonymity but recognises that some complainants may have good reasons for it; we will treat all anonymous communications with seriousness, mindful that some are well-intentioned and some are not

14. Roles and Responsibilities

Role	Responsibility
Governing Body	Approves and reviews this policy; receives annual report on complaints; oversees Stage 2 panels; ensures complaints procedure is published and accessible
Chair of Governors (Rebecca Shilling)	Handles complaints about the Headteacher; oversees decisions on unreasonable / vexatious classifications; chairs governance-related complaints
Vice-Chair of Governors	Handles complaints about the Chair; supports the Chair as needed
Inclusion / SEND Link Governor	Engaged where complaints concern SEND, disability, or inclusion matters
Complaints Panel (Stage 2)	Three governors with no prior involvement; review complaint and Stage 1 outcome; reach a determination
Headteacher (Anthony David)	Senior accountable leader for complaints; handles Stage 1; co-ordinates investigation; reports to governors
Deputy / SLT	Handle informal concerns within their remit; support Stage 1 investigation
SENCO (Lucy Courtney-Diggins)	Handles informal concerns relating to SEND; co-ordinates with families on SEN-related complaints
Designated Safeguarding Lead (DSL)	Receives complaints raising safeguarding concerns; manages these under KCSIE 2026
Class teachers	First point of contact for informal concerns about their class; refer to senior leaders where appropriate

Office team	Receive complaints; direct to the right person; manage complaints register; arrange interpreter or accessibility support
Clerk to Governors	Supports Stage 2 panel proceedings; maintains complaint records; ensures procedural fairness
Data Protection Officer (Claire Mahegan)	Advises on data protection in complaints handling; responds to SARs
LDBS / Diocesan Director of Education	Engaged for complaints concerning the school's Christian distinctiveness, RE, collective worship, governance, or where the Chair is the subject of complaint

15. Monitoring, Review and Links with Other Policies

15.1 Monitoring

- Termly summary reports of complaint volumes, stages reached, and time taken — to the Governing Body Personnel / Standards Committee
- Annual analysis of complaint themes, outcomes, lessons learned, and equality considerations — to the Full Governing Body
- Specific reporting on AI-enhanced complaints, social media issues, and unreasonable / vexatious classifications
- Trend analysis to inform school improvement
- Equality monitoring — are complaints from particular groups being well-served? Are reasonable adjustments being made?
- Staff voice and union engagement on the operation of the policy and the support given to staff named in complaints

15.2 Review of this policy

- Annual review by the Governing Body
- Earlier review on statutory change, including any update to DfE Best Practice Guidance
- Earlier review where pattern of complaints suggests procedural improvement is needed
- Consultation with staff, recognised trade unions, parent representatives, and pupil voice

15.3 Links with other policies

- Child Protection and Safeguarding Policy 2026–27
- Suspension and Permanent Exclusion Policy 2026–27
- SEND Policy 2025–26
- Accessibility Plan 2025–2028
- Equality, Race and Gender Policy 2026–27
- Positive Relationships Policy 2026–27

- Home/School Agreement 2026–27
- PSHE / RSHE Policy 2025–26
- Teaching and Learning AI Policy 2025–26
- Data Protection Policy 2026–27 and Privacy Notices
- Health and Safety Policy 2026–27
- Staff Code of Conduct 2026–27
- Staff Sickness and Absence Policy 2026–27
- Capability Policy and Disciplinary Policy (linked, not duplicated)
- Grievance Policy
- Whistleblowing Policy
- Freedom of Information Publication Scheme
- School Admissions Policy
- Anti-Bullying Policy (forthcoming)

15.4 Sign-off

Role	Name and date
Headteacher	Anthony David
Date	[Date]
Chair of Governors	Rebecca Shilling
Date	[Date]
Staff consultation completed	[Date]
Parent / community consultation	[Date]
Trade union consultation	[Date]

Appendix A: Complaints Procedure at a Glance

If you have a concern or complaint about the school:

STEP 1 — INFORMAL

Speak to the class teacher (or relevant staff member) at the earliest opportunity. Most concerns are resolved at this stage.

STEP 2 — STAGE 1 FORMAL

If informal resolution does not work, submit a written complaint using the Complaint Form (Appendix B) to the Headteacher. (For complaints about the Headteacher, address to the Chair of Governors.) Acknowledged within 3 working days; written response within 15 working days.

STEP 3 — STAGE 2 FORMAL

If you are not satisfied with the Stage 1 outcome, you may request a Stage 2 review by a Governors' Complaints Appeal Panel. Request in writing to the Chair of Governors within

10 working days of the Stage 1 outcome. Panel convened within 20 working days; written outcome within 5 school days of the panel.

STEP 4 — DEPARTMENT FOR EDUCATION

If you remain dissatisfied, you may ask the DfE to review whether the school followed its own procedure. The DfE does not normally reinvestigate the substance.

Appendix B: Complaint Form

Complaint Form — St Mary's CofE Primary School

Your details

Name:

Address:

Postcode:

Telephone (daytime):

Telephone (evening):

Email:

If you are a parent / carer, name of child(ren) and year group(s):

Your relationship to the school: (parent, carer, neighbour, member of the public, former parent, other)

Your complaint

Please describe your complaint as clearly as you can. Include dates, what happened, who was involved, and what you have already done to try to resolve the matter.

What outcome are you seeking?

Please tell us what you would like the school to do to resolve this complaint.

Adjustments

Do you need any reasonable adjustments to the process? (e.g. translation, large print, interpreter, alternative meeting format)

Signature:

Date:

For school use:

Date received:

Received by:

Referred to:

Date acknowledged:

Stage 1 outcome:

Date of outcome:

Appendix C: Compliments Form

We welcome compliments as well as complaints. Hearing what is going well helps us keep doing it.

Compliments Form — St Mary's CofE Primary School

Your details (optional)

Name:

Email:

Relationship to the school:

Your compliment

Please share what has been good. Include any specific staff, lessons, events, or aspects of school life you would like to mention. We share compliments with the people they relate to — they are a real boost.

Date:

Appendix D: Model Stage 1 Closure Letter

[School letterhead]

Dear [Mr / Mrs / Ms] [Name],

FORMAL STAGE 1 COMPLAINT — OUR RESPONSE

Thank you for your complaint dated [date]. I have now completed my investigation into the matters you raised. I am writing to share the outcomes.

Your complaint

You raised the following matters [summarised in your own words, listed point by point]:

- 1.
- 2.
- 3.

Investigation

I have investigated by [meeting with you on [date]; speaking with [staff member(s)]; reviewing [records / correspondence]; speaking with [pupil(s) with [parent / carer] present]; etc.].

Findings

1. On the matter of [point 1], I find that... [Upheld / partially upheld / not upheld]
2. On the matter of [point 2]...
3. On the matter of [point 3]...

Actions the school will take

[List of actions arising from the investigation, with timescales]

If you are not satisfied with this outcome

You have the right to escalate to Stage 2 of our Complaints Procedure. This involves a review by a panel of governors who have not previously been involved. To request Stage 2, please write to the Chair of Governors via the school office within 10 working days of the date of this letter, setting out the grounds for your request and any additional evidence you wish the panel to consider.

Please let me know if you wish me to clarify any aspect of this response.

Yours sincerely,

Anthony David
Executive Headteacher

Appendix E: Model Stage 2 Closure Letter

[School letterhead]

Dear [Mr / Mrs / Ms] [Name],

FORMAL STAGE 2 COMPLAINT — PANEL OUTCOME

The Governors' Complaints Appeal Panel met on [date] to review your complaint, which was originally addressed at Stage 1 on [date]. I am writing on behalf of the panel to inform you of the panel's decision.

Your complaint

Your complaint was summarised as follows: [summary]

The panel's consideration

The panel considered: your written complaint; the Stage 1 investigation outcome and supporting documents; any additional evidence you submitted; and the oral submissions made at the meeting by [you / your representative] and by [the Headteacher / Stage 1 investigator].

The panel's findings

[Detailed findings on each aspect of the complaint and on the Stage 1 investigation. Whether the panel finds that the Stage 1 investigation was reasonable / conducted with appropriate procedural fairness. Findings on each point of the complaint.]

The panel's decision

[Decision: complaint upheld / partially upheld / not upheld. Any actions the school is recommended or required to take.]

If you remain dissatisfied

Stage 2 is the final stage of the school's internal complaints procedure. If you believe the school has not followed its complaints procedure or has acted unreasonably in matters under education law, you may write to:

School Complaints Unit
Department for Education
Piccadilly Gate
Store Street
Manchester M1 2WD

Online: www.gov.uk/complain-about-school

The DfE does not normally reinvestigate the substance of the complaint but will consider whether the school adhered to its own procedure and to relevant statutory and legal frameworks.

Yours sincerely,

[Clerk to Governors / Chair of the Complaints Panel]

Appendix F: Key Contacts and References

F.1 Key contacts

Contact	Detail
School office (first point of contact)	020 7359 1870 / [school office email]
Executive Headteacher	Anthony David, c/o school office
Chair of Governors	Rebecca Shilling, c/o school office
Vice-Chair of Governors	[Name], c/o school office
SENCO	Lucy Courtney-Diggins, 020 7359 1870
Designated Safeguarding Lead	[Name and contact]
Data Protection Officer	Claire Mahegan
London Borough of Islington — Schools team	[LBI school complaints route]
LDBS (London Diocesan Board for Schools)	020 7932 1147 / www.ldbs.co.uk
DfE School Complaints Unit	www.gov.uk/complain-about-school
Ofsted	www.gov.uk/government/organisations/ofsted
Information Commissioner's Office (ICO)	0303 123 1113 / www.ico.org.uk
LADO (Islington)	via Islington MASH

F.2 Support for parents and carers

- ****ParentKind**** — advice and support for parents, including how to raise concerns with schools effectively: www.parentkind.org.uk
- ****Citizens Advice**** — free, independent advice including on education matters: www.citizensadvice.org.uk
- ****SENDIASS (Special Educational Needs and Disability Information, Advice and Support Service) Islington**** — free, confidential, impartial advice on SEND: [Islington SENDIASS contact]
- ****ACE Education**** — advice on education law and rights: www.ace-ed.org.uk
- ****Coram Children's Legal Centre**** — specialist legal advice on children and education law: www.childrenslegalcentre.com

F.3 References

- Education Act 2002, sections 29, 175
- Education Act 1996, sections 496, 497
- School Standards and Framework Act 1998, section 94
- DfE: 'Best practice guidance for school complaints procedures 2020' (last updated 15 January 2021)
- Equality Act 2010, sections 13, 19, 20, 149, Schedule 1
- Human Rights Act 1998
- UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025
- Freedom of Information Act 2000
- Worker Protection (Amendment of Equality Act 2010) Act 2023
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children 2026
- Defamation Act 2013
- Protection from Harassment Act 1997
- Malicious Communications Act 1988
- Communications Act 2003, s.127
- Public Interest Disclosure Act 1998
- Children and Families Act 2014, Part 3 (SEND)
- SEND Code of Practice 2015
- UN Convention on the Rights of the Child
- UNICEF UK Rights Respecting Schools framework

Our vision

We believe that everyone is precious and loved by God. We aspire to let our light shine in all that we do. We nurture and empower one another to flourish. Together we shine in our world by showing compassion and by serving others. Let God's light shine through us.