King's Reach Education

Complaints Procedure

Authorisation by:	Board of Trustees
Last reviewed on:	September 2026
Next review due by:	Septmeber 2027
Presented at Governance meeting:	7th October 2026

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

Table of Contents

Aims 3

Legislation and guidance 3

Definitions 4

Procedure 5

1. Principles for investigation 5
2. Time Scales 5
3. Stages of complaint (not against the Headteacher or Trustees) 5

Complaints against the Headteacher or a Trustee 8

Referring complaints on completion of the school's procedure 8

Persistent complaints 9

Record-keeping 10

Learning lessons 11

Monitoring arrangements 11

Links with other policies 11

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

Aims

King's Reach aims to meet its statutory obligations when responding to complaints from parents/carers of pupils at the school and others.
When responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel if necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Make sure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement evaluation processes

We try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed.

The school will aim to give the complainant the opportunity to complete the complaints procedure in full.

To support this, we will ensure we publicise the existence of this policy and make it available on the school website.

Throughout the process, we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

Legislation and guidance

This document meets the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014, which states that we must have and make available a written procedure to deal with complaints from parents of pupils at the school.

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

It is also based on guidance published by the Education and Skills Funding Agency (ESFA) on creating a complaints procedure that complies with the above regulations, and refers to good practice guidance on setting up complaints procedures from the Department for Education (DfE).

This document meets the requirements of section 35 of the schedule to the Education (Non-Maintained Special Schools) (England) Regulations 2011, which states that non-maintained special schools must have and make available a written procedure to deal with complaints relating to their school.

It also refers to good practice guidance on setting up complaints procedures from the Department for Education (DfE).

Definitions

The DfE guidance explains the difference between a concern and a complaint.
A concern is defined as, 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'.
A complaint is defined as, 'an expression of dissatisfaction however made, about actions taken or a lack of action'.

The school will resolve concerns through day-to-day communication as far as possible and will aim to resolve complaints informally where possible at the earliest possible stage. There may be occasions when complainants would like to raise their concerns formally. This policy outlines the procedure relating to handling such complaints.

This policy does not cover complaints procedures relating to:

- Admissions
- Statutory assessments of special educational needs (SEN)

- Whistle-blowing
- Staff grievances
- Staff discipline

Please see our separate policies for procedures relating to these types of complaint.

Complaints about services provided by other providers who use school premises or facilities should be directed to the provider concerned.

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

Procedure

1. Principles for investigation

When investigating a complaint, we will try to clarify:

- What has happened
- Who was involved
- What the complainant feels would put things right

We also intend to address complaints as quickly as possible. To achieve this, realistic and reasonable time limits will be set for each action within each stage.

Where further investigations are necessary new time limits will be set and the complainant will be sent details of the new deadline with an explanation for the delay. The school expects that complaints will be made as soon as possible after an incident arises and no later than 3 months afterwards. We will consider exceptions to this timeframe in circumstances where there were valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved.

2. Time Scales

The complainant must raise the complaint within 3 months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within 3 months of the last incident.

We will consider exceptions to this time frame in circumstances where there were valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved.

When complaints are made out of term time, we will consider them to have been received on the first school day after the holiday period.

If at any point we cannot meet the time scales we have set out in this policy, we will:

Set new time limits with the complainant

Send the complainant details of the new deadline and explain the delay

3. Stages of complaint (not against the Headteacher or Trustees)

Stage 1: informal

The school will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

The complainant should raise the complaint as soon as possible with the Deputy Head or the Headteacher as appropriate, either in person or by letter, telephone or email. If the complainant is unclear who to contact or how to contact them, they should contact the school office.

The school will acknowledge informal complaints within 5 working days and investigate and provide a response within 10 working days. The informal stage will involve a meeting between the complainant and the Headteacher, as appropriate.

If the complaint is not resolved informally, it will be escalated to a formal complaint.

Stage 2: formal

The Headteacher should be informed in writing unless this is an escalation of an informal complaint. This letter should provide details such as relevant dates, times, and the names of witnesses of events, alongside copies of any relevant documents. The complainant should also state what they feel would resolve the complaint.

The Headteacher (or designated member of the senior leadership team) will call a meeting to clarify concerns and seek a resolution. The complainant may be accompanied to this meeting and should inform the school of the identity of their companion in advance.

In certain circumstances, the school may need to refuse a request for a particular individual to attend any such meeting – for example, if there is a conflict of interest. If this is the case the school will notify the complainant as soon as they are aware, so that the complainant has the opportunity to arrange alternative accompaniment.

The Headteacher (or other person appointed by the Headteacher for this purpose) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within 5 working days.

If the complainant wishes to proceed to the next stage of the procedure, they should inform the Trustees in writing within 5 days. This letter should set out the details of the complaint including evidence as set out above. The complainant should also specify what they feel would resolve the complaint and how they feel the previous stage of the procedure has not addressed their complaint sufficiently. An investigation will then be undertaken by the management committee.

A written record of a formal complaint will be kept whether they are resolved following a formal procedure or proceed to a panel hearing. A record of action taken by the school as a result of those complaints (regardless of whether they are upheld) will be kept and all correspondence, statements and records relating to individual complaints are to be

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

kept confidential except where the Secretary of State or a body conducting and inspection under section 109 of the 2008 Act requests access to them.

Stage 3: Review Panel

Complaints will be escalated to a hearing before a panel if the complainant is not satisfied with the response to the complaint at the second, formal, stage.

A panel is appointed by or on behalf of the Headteacher and consists of at least three people who were not directly involved in the matters detailed in the complaint and at least one panel member is independent of the management and running of the school. This person must not, at any time, have been a member of the school leadership team, or a member of staff or supply staff at the school, and must not have been the parent of a registered or former registered pupil at the school. They must also not have been directly involved in any matter detailed in the complaint.

The panel will have access to the existing record of the complaint's progress and will convene a review meeting with the complainant and representatives from the school, as appropriate. Each will have an opportunity to set out written or oral submissions prior to the meeting.

A parent may attend and may be accompanied to the panel hearing if they so wish.

At the meeting, each individual will have the opportunity to give statements and present their evidence and witnesses will be called as appropriate to present their evidence. The panel, the complainant and the school representative(s) will be given the chance to ask and reply to questions.

The panel may make findings and recommendations and a copy of those findings and recommendations will be provided to the complainant and, where relevant, the person complained about. These findings and recommendations will be available for inspection on the school premises by the Headteacher.

The panel will inform those involved of the decision in writing within 5 working days. The complainant, Headteacher, and where relevant, the subject of the complaint, will be given a copy of the findings and recommendations made by the panel.

A written record of a complaint that resulted in a hearing before a panel will be kept. A record of action taken by the school as a result of those complaints (regardless of whether they are upheld) will be kept and all correspondence, statements and records relating to individual complaints are to be kept confidential except where the Secretary of State or a body conducting and inspection under section 109 of the 2008 Act requests access to them.

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

Complaints against the Headteacher or a Trustee

Complaints made against the Headteacher should be directed to the Trustees. Where a complaint is against the Trustees or any member of the Trust, it should be made in writing to the Chair of the Trustees.

The Trustees need to consider to what extent the internal investigation of a complaint against a member by another member generates a conflict of interest or prejudice. No member of the school staff, including the Headteacher, should be involved in the investigation of a complaint against a member other than as a witness.

Stage 1: informal

Complaints made against the Headteacher, or any member of the trustee board should be directed to the clerk to the governing board in the first instance.

If the complaint is about the Headteacher or one member of the trustee board (including the chair or vice-chair), a suitably skilled and impartial trustee will carry out the steps at stage 1.

Stage 2: formal

If the complaint is:

- Jointly about the chair and vice-chair or
- The entire trustee board or
- The majority of the trustee board

An independent investigator will carry out the steps in stage 2. They will be appointed by the Trustee board and will write a formal response at the end of their investigation.

Stage 3: review panel

If the complaint is:

- Jointly about the chair and vice-chair or
- The entire governing board or
- The majority of the governing board

A committee of independent governors will hear the complaint. They will be sourced from local schools, the local authority and will carry out the steps at stage 3.

Referring complaints on completion of the school's procedure

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

If the complainant is unsatisfied with the outcome of the above complaints procedure and is regarding the school not meeting standards set by the DfE the complainant can refer their complaint directly to the DfE if it relates to any of the following areas:

- Education
- Pupil welfare and health and safety
- School premises
- Staff suitability
- Making information available to parents
- The spiritual, moral, social or cultural development of pupils

The DfE will consider reports of a major failure to meet the standards. Where appropriate, it can arrange an emergency inspection to look at pupil welfare and health and safety, and make sure that the school deals with serious failings.

For more information or to refer a complaint, see the following webpage:
https://www.gov.uk/complain-about-school

Persistent complaints

Where a complainant tries to re-open the issue with the school after the complaints procedure has been fully exhausted and the school has done everything it reasonably can in response to the complaint, the Chair of Trustees (or other appropriate person in the case of a complaint about the Chair) will inform the complainant that the matter is closed.
If the complainant subsequently contacts the school again about the same issue, the school can choose not to respond. The normal circumstance in which we will not respond is if:

- The school has taken every reasonable step to address the complainant's needs, and
- The complainant has been given a clear statement of the school's position and their options (if any), and
- The complainant is contacting the school repeatedly but making substantially the same points each time

However, this list is not intended to be exhaustive.

The school will be most likely to choose not to respond if:

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

- We have reason to believe the individual is contacting the school with the intention of causing disruption or inconvenience, and/or
- The individual's letters/emails/telephone calls are often or always abusive or aggressive, and/or
- The individual makes insulting personal comments about, or threats towards, school staff

Unreasonable behaviour which is abusive, offensive or threatening may constitute an unreasonably persistent complaint.

Once the school has decided that it is appropriate to stop responding the complainant will be informed in writing, either by letter or email. The school will ensure when making this decision that complainants making any new complaint are heard, and that the school acts reasonably.

Where unreasonably persistent complaints are received, the school will write to the individual and outline why it is deemed as such and will deal with the matter as a persistent complaint.

Record-keeping

The school will record the progress of all complaints, including information about actions taken at all stages, the stage at which the complaint was resolved, and the final outcome. The records will also include copies of letters, emails, phone call records and notes relating to meetings and conversations.

This material will be treated as confidential and held centrally. Such material will be viewed only by those involved in investigating the complaint or on the review panel.

This is except where the Secretary of State (or someone acting on their behalf) or the complainant requests access to records of a complaint through a freedom of information (FOI) request or under the terms of the Data Protection Act, or where the material must be made available during a school inspection.

Records of complaints will be kept for 10 years.

The details of the complaint, including the names of individuals involved, will not be shared with the whole Governing body in case a review panel needs to be organised at a later point.
Where the Governing body is aware of the substance of the complaint before the review panel stage, the school will (where reasonably practicable) arrange for an independent panel to hear the complaint.

King's Reach
St Hilary's House, Reculver Walk
Maidstone, ME15 8SW

01622 693737
info@kingsreach.org.uk
kingsreach.org.uk

Complainants also have the right to request an independent panel if they believe there is likely to be bias in the proceedings. The decision to approve this request is made by the Trustee, who will not unreasonably withhold consent.

Learning lessons

The Trustees will review any underlying issues raised by complaints with the Head of School, where appropriate and respecting confidentiality, to determine whether there are any improvements that the school can make to its procedures or practice to help prevent similar events in the future.

Monitoring arrangements

The Trustees will monitor the effectiveness of the complaints procedure in ensuring that complaints are handled properly. The Trustees will track the number and nature of complaints, and review underlying issues as stated in section 10.

The complaints records are logged and managed by school administrator.

This policy will be reviewed by the Trustees every year. At each review, the policy will be approved the Trustees.

All member of staff that are likely to be involved in handling complaints will make be suitably trained to do so.

Links with other policies

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Staff grievance procedures
- Staff disciplinary procedures

Safeguarding Lead Trustee: Stewart King, email: stewart@kingsreach.org.uk