Compassion Courage Cooperation

Wittersham Church of England Complaints Policy 2026

We strive to cooperate and work alongside all members of our community to feel valued, nurtured, and empowered as they embark upon their journey to become the very best that God intended. Throughout their voyage of discovery with us, we ensure all children are provided with a rich curriculum and experiences that promote courage and a strong moral purpose underpinned by our Christian values, preparing them to become compassionate citizens within our rural community and the wider world.

Revision History

Version	Date	By	Description
V01	July 2025	Mrs Coulson	New Policy
V02	February 2026	Mrs Coulson	Updated Policy

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1. Who Can Make a Complaint

This complaints procedure is not limited to parents or carers of children who are registered at the school. Any person, including members of the public, may make a complaint to Wittersham Church of England Primary School about any provision of facilities or services that we provide. Unless complaints are dealt with under separate statutory procedures (such as appeals relating to exclusions or admissions), we will use this complaints procedure.

2. The Difference Between a Concern and a Complaint

A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'. A complaint may be defined as 'an expression of dissatisfaction, however made, about actions taken or a lack of action'.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaints procedure. Wittersham Church of England Primary School takes concerns seriously and will make every effort to resolve matters quickly and sensitively.

3. How to Raise a Concern or Make a Complaint

A concern or complaint can be made in person, in writing, or by telephone. They may also be made by a third party acting on behalf of a complainant, provided they have appropriate consent.

Concerns should be raised with either the class teacher or the headteacher. If the issue remains unresolved, the next step is to make a formal complaint.

Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis, and it may also prevent them from considering complaints at Stage 2 of the procedure.

Any complaint should be sent to our complaints coordinator, Mrs Caroline Penn, in the school office. This should be sent via email to: office@wittersham.kent.sch.uk.

An outline of who complaints should be addressed to is below:

- Complaints against school staff (except the headteacher) should be made to Mrs Stella Coulson (Headteacher).
- Complaints about the headteacher should be addressed to Mr John Collins (Chair of Governors).
- Complaints about the Chair of Governors, an individual governor or the whole governing body should be addressed to Jane Phillips (Clerk to the Governing Body).

In accordance with equality law, we will consider making reasonable adjustments, for example, providing information in alternative formats or arranging accessible meeting venues.

Anonymous complaints will not normally be investigated. However, the headteacher or Chair of Governors will determine whether the complaint warrants an investigation.

Complaints must be raised within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. Complaints made outside of this time frame may be considered in exceptional

circumstances.

Complaints received outside of term time will be treated as received on the first school day after the holiday period.

4. Definitions and Aims

The Department for Education (DfE) defines:

- A concern as an expression of worry or doubt over an issue considered to be important for which reassurances are sought.
- A complaint as an expression or statement of dissatisfaction however made, about actions taken or a lack of action.

Wittersham Church of England Primary School is committed to resolving complaints promptly, fairly and effectively. We aim to:

- Be impartial and non-adversarial
- Conduct full and fair investigations
- Address all points of concern and respond appropriately
- Respect confidentiality
- Treat all parties with courtesy
- Ensure decisions are lawful, reasonable and proportionate
- Communicate progress clearly
- Use complaints to inform school improvement

5. Legislation and Guidance

This policy complies with section 29 of the Education Act 2002 and is informed by the DfE's model policies on complaints and managing unreasonable complaints. For Early Years Foundation Stage (EYFS) provisions, this policy adheres to the requirements set out in the statutory framework.

6. Scope

This policy covers complaints about the school's provision, services and facilities. It does not cover:

- Admissions
- SEN statutory assessments
- Safeguarding
- Suspensions and permanent exclusions

- Whistleblowing
- Staff grievances and discipline
- Reorganisation proposals
- Curriculum and collective worship

Complaints about third-party providers using the school premises should be directed to the provider.

7. Principles for Investigation

Investigations will focus on establishing facts and identifying solutions. Written complaints regarding EYFS compliance will receive a written response within 28 days.

8. Informal Concerns

Informal concerns should be addressed to the relevant staff member or the headteacher. The school aims to acknowledge concerns promptly and offer resolutions where possible. Unresolved concerns move to the formal complaints stage.

9. Stages of Complaint

Stage 1: Formal Complaint

Formal complaints must be made to the headteacher (unless they are about the headteacher), via the school office. This may be done in person, in writing, or by telephone.

The headteacher will record the date the complaint is received and will acknowledge receipt in writing (either by letter or email) within 5 school days. Within this response, the headteacher will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the complainant would like to see. A face-to-face meeting may be offered.

The headteacher may delegate the investigation to another senior leader but not the final decision.

During the investigation, the headteacher (or delegate) will:

- Interview those involved, allowing them to be accompanied if they wish
- Keep a written record of meetings/interviews

A formal written response will be issued within 20 school days. If delayed, an update and revised timeline will be provided. The response will explain the decision, reasons, and

actions taken (if any), and will advise how to escalate if dissatisfied.

If the complaint is about the headteacher or a governor (including the Chair/Vice Chair), a suitably skilled governor will investigate. Complaints about the headteacher or a governor should be submitted to the Clerk. If the complaint is about:

- both the Chair and Vice Chair,
- the entire governing body, or
- the majority of the governing body,

Stage 1 will be considered by an independent investigator appointed by the governing board or the Canterbury Diocese.

Stage 2: Review Panel If the complainant is dissatisfied with the Stage 1 outcome, they can escalate to Stage 2 – a meeting with the governing body's complaints committee. This request must be made in writing to the Clerk within 5 school days of the Stage 1 outcome.

The Clerk will:

- Record the date received
- Acknowledge the request within 5 school days

The panel meeting will be arranged within 20 school days. If delayed, the Clerk will inform the complainant. If three dates are rejected without good reason, the meeting will proceed in the complainant's absence.

The committee will consist of at least three impartial governors. If fewer than three are available, the Clerk will source independent governors or form an independent committee. The panel will decide to proceed with a meeting or written submissions, being sensitive to the complainant's needs.

The complainant may bring a friend or relative. Legal representation is generally discouraged, unless appropriate (e.g., a staff witness supported by a union). Media representatives are not permitted.

At least 10 school days before the meeting, the Clerk will:

- Confirm date, time and venue, ensuring accessibility
- Request submission of further written materials (to be submitted 7 days before the meeting)

All documents will be circulated 5 days before the meeting. Covert recordings will not be

accepted. The panel will not accept new complaints or unrelated evidence. Meetings are private, and electronic recordings require consent.

The panel may:

- Uphold the complaint in full or in part
- Dismiss the complaint in full or in part

If upheld, the panel may:

- Recommend actions to resolve the issue
- Suggest changes to systems or procedures

A full explanation will be sent within 15 school days of the meeting. The letter will explain how to escalate to the Department for Education if dissatisfied.

Where complaints are about:

- both the Chair and Vice Chair,
- the entire governing body, or
- the majority of the governing body,

Stage 2 will be heard by a committee of independent governors.

10. Resolving Complaints

At each stage in the procedure, the school aims to resolve the complaint. If appropriate, we may:

- Acknowledge the complaint is upheld in whole or in part
- Provide an explanation
- Admit that the situation could have been handled differently or better
- Assure that the event complained of will not recur
- Explain what steps will be taken and the timescale for any changes
- Review school policies
- Offer an apology

11. Withdrawal of a Complaint

If a complainant wishes to withdraw their complaint, they should confirm this in writing.

12. Complaints Against the Headteacher or Governors

Complaints involving the headteacher should be sent to the Chair of Governors. Complaints about the Chair or governors should be sent to the Clerk. Where appropriate, an independent investigator or governor from another school may be appointed.

13. Referring Complaints on Completion of the School Procedure

If unresolved, complaints may be referred to the Department for Education. Visit: www.gov.uk/complain-about-school

14. Unreasonable, Persistent Complaints and Harassment

The school is committed to dealing with all complaints fairly, impartially and with courtesy, and to providing a high-quality service to those who raise concerns. We recognise the importance of open communication and will not normally limit contact between complainants and the school.

However, the school does not expect staff to tolerate behaviour which is unreasonable, persistent or amounts to harassment. Action will be taken where such behaviour places an unreasonable demand on staff time, causes distress to staff, or disrupts the effective running of the school or the wellbeing of pupils.

Unreasonable, persistent or harassing behaviour may be defined as behaviour which hinders the school's consideration of complaints because of the frequency, nature or tone of communication. This may include, but is not limited to, situations where a complainant:

- repeatedly contacts the school about the same issue after a full response has been provided and the matter has been concluded;
- continues to pursue a complaint once all stages of the Complaints Procedure have been exhausted.
- re-submits the same complaint in different formats or directs it to multiple members of staff;
- refuses to clearly set out the grounds of a complaint or the outcomes sought, despite support being offered;
- refuses to co-operate with the complaints process or accept that certain issues fall outside its scope;
- raises excessive, repetitive or detailed correspondence and expects immediate responses to their own timescales;
- changes the basis of the complaint as it progresses;
- makes unjustified complaints about staff involved in handling the matter;
- seeks outcomes which are unrealistic or beyond the school's authority;

- uses intimidating, aggressive, abusive or oppressive language or behaviour, including behaviour that causes ongoing distress to staff, even if individual communications appear reasonable in isolation.

Complainants are expected to limit communication with the school to what is necessary while a complaint is being considered. Repeated or excessive correspondence may delay resolution.

Where communication is considered to be becoming unreasonable or persistent, the school will normally seek to address concerns informally in the first instance. If the behaviour continues, the school will write to the complainant to explain why their communication is considered unreasonable and to set out clear expectations for future contact.

Where necessary, the school may take proportionate steps to manage communication, which may include:

- confirming in writing that the complaint has been fully considered and is now closed;
- limiting communication to one agreed method and/or a single named point of contact;
- setting clear timescales for responses;
- declining to respond to further correspondence on the same matter unless new and substantive information is provided;
- implementing a specific communication plan, which may include limits on the frequency or form of contact.

If unreasonable or harassing behaviour continues, further action may be taken to protect pupils, staff and the wider school community. This may include restricting contact with named members of staff, declining further correspondence on the matter, or taking additional steps where behaviour is considered threatening or abusive.

Any measures put in place will be proportionate, kept under review, and lifted if communication becomes reasonable. Legitimate new concerns will continue to be considered in line with the school's Complaints Procedure

15. Record Keeping and Confidentiality

Complaint records will be held securely and shared only on a need-to-know basis, in line with data protection requirements.

16. Learning Lessons

The senior leadership team and governing board will review complaints and use findings to inform school improvement.

17. Monitoring Arrangements

The governing board will monitor the frequency and nature of complaints and review the policy every two years.

18. Linked Policies

- Safeguarding and Child Protection Policy
- Behaviour Policy
- Admissions Policy
- SEN Policy and Information Report
- Whistleblowing Policy
- Staff Grievance and Disciplinary Policies
- Privacy Notice
- Equality and Accessibility Policies

19. Roles and Responsibilities

Complainant: The complainant will receive a more effective response to the complaint if they:

- explain the complaint in full as early as possible
- co-operate with the school in seeking a solution to the complaint
- respond promptly to requests for information or meetings or in agreeing the details of the complaint
- ask for assistance as needed
- treat all those involved in the complaint with respect
- refrain from publicising the details of their complaint on social media and respect confidentiality

Investigator: The investigator's role is to establish the facts relevant to the complaint by:

- providing a comprehensive, open, transparent and fair consideration of the complaint through:
    - sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved
    - interviewing staff and children/young people, and other people relevant to

the complaint
    - consideration of records and other relevant information
    - analysing information
- liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right

The investigator should:

- conduct interviews with an open mind and be prepared to persist in the questioning
- keep notes of interviews or arrange for an independent note-taker to record minutes of the meeting
- ensure that any papers produced during the investigation are kept securely pending any appeal
- be mindful of the timescales to respond
- prepare a comprehensive report for the headteacher or complaints committee that sets out the facts, identifies solutions and recommends courses of action to resolve problems

The headteacher or complaints committee will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details

Complaints Co-ordinator: The complaints co-ordinator should:

- ensure that the complainant is fully updated at each stage of the procedure
- liaise with staff members, headteacher, Chair of Governors, Clerk and LAs (if appropriate) to ensure the smooth running of the complaints procedure
- be aware of issues regarding:
    - sharing third party information
    - additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person
- keep records

Clerk to the Governing Body: The Clerk is the contact point for the complainant and the committee and should:

- ensure that all people involved in the complaint procedure 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)

- set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible
- collate any written material relevant to the complaint (for example; stage 1 paperwork, school and complainant submissions) and send it to the parties in advance of the meeting within an agreed timescale
- record the proceedings
- circulate the minutes of the meeting
- notify all parties of the committee's decision

Committee Chair The committee's chair, who is nominated in advance of the complaint meeting, should ensure that:

- both parties are asked (via the Clerk) to provide any additional information relating to the complaint by a specified date in advance of the meeting
- the meeting 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
- complainants who may not be used to speaking at such a meeting are put at ease
- the remit of the committee is explained to the complainant
- 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
- both the complainant and the school are given the opportunity to make their case and seek clarity
- the issues are addressed
- key findings of fact are made
- the committee is open-minded and acts independently
- no member of the committee has an external interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- the meeting is minuted
- they liaise with the Clerk (and complaints co-ordinator, if the school has one)

Committee Member: Committee members should be aware that:

- the meeting must be independent and impartial, and should be seen to be so. No governor may sit on the committee if they have had prior involvement in the complaint or in the circumstances surrounding it
- the aim of the meeting should be to resolve the complaint and achieve reconciliation between the school and the complainant. It may only be possible to

establish the facts and make recommendations

- many complainants will feel nervous and inhibited in a formal setting. Parents/carers often feel emotional when discussing an issue that affects their child
- extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting. Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated
- the committee should respect the views of the child/young person and give them equal consideration to those of adults. If the child/young person is the complainant, the committee should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the committee should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend
- however, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the committee considers is not in the child/young person's best interests

20. Next Steps

If the complainant believes the school did not handle their complaint in accordance with the published complaints procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the Department for Education after they have completed Stage 2.

The Department for Education will not normally reinvestigate the substance of complaints or overturn any decisions made by Wittersham Church of England Primary School. They will consider whether the school has adhered to education legislation and any statutory policies connected with the complaint.

Complainants can refer their complaint to the Department for Education:

- Online at: www.education.gov.uk/contactus
- Telephone: 0370 000 2288
- By writing to: Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD