Frays Academy Trust
Complaints Policy

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Approval

Signed by Chair of Directors	
Date of Approval/Adoption	August 2026
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This policy will be subject to ongoing review and may be amended prior to the scheduled date of the next review in order to reflect changes in legislation, statutory guidance, or best practice (where appropriate).

To enable continuous improvement, all readers are encouraged to notify the author of errors, omissions and any other form of feedback

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Contents

1 Aims 3
2 Legislation and guidance 3
3 Definitions and scope 3
3.1 Definitions 3
3.2 Scope 4
4 Roles and responsibilities 4
4.1 The Complainant 4
4.2 The Investigator 4
4.3 Panel Chair (should the complaint reach Stage 3) 5
4.4 Clerk to the Local Governing Body/Board of Directors (should the complaint reach Stage 3) 5
5 Principles for investigation 5
5.1 Timescales 6
5.2 Complaints about Early Years (Reception and Nursery) 6
6 Stages of complaint 6
6.1 Stage 1: Informal Resolution 6
6.2 Stage 2: Formal Complaint 7
6.2.1 Submitting complaints 7
6.2.2 Investigation 8
6.3 Stage 3: complaints Panel hearing 10
6.3.1 Convening the Panel 10
6.3.2 At the meeting 10
6.3.3 The outcome 11
7 Referring complaints on completion of the procedures 11
8 Unreasonable, vexatious and persistent complaints 12
8.1 Unreasonable and vexatious complaints 12
8.1.1 Steps we will take 12
8.1.2 Stopping responding 12
8.1.3 Duplicate complaints 13
8.2 Complaint campaigns 13
9 Managing AI-Generated and Digitally Assisted Complaints 13
9.1 Our approach 13
9.2 Use of AI in our responses 14
10 Barring from the School Premises 14
11 Record keeping and confidentiality 14
12 Learning lessons 15
13 Monitoring arrangements 15
14 Links with other policies 16
Appendix 1 – Complaint Form 17
Appendix 2 – School and Frays Academy Trust Contact Details 18

1 Aims

Frays Academy Trust aims to meet its statutory obligations when responding to complaints from parents of pupils at our schools, 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, where 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 and Trust 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 Trust 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 each school's website as well as the Trust's website.

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

2 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.

It is also based on best practice guidance for academies complaints procedures from the Department for Education (DfE).

In addition, it addresses duties set out in the Early Years Foundation Stage statutory framework with regards to dealing with complaints about the school's fulfilment of Early Years Foundation Stage requirements.

3 Definitions and scope

3.1 Definitions

Department for Education (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".

In most cases, a concern can be resolved through informal means. A complaint will follow formal procedures.

3.2 Scope

We intend 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
- Data protection, privacy and information rights complaints (including subject access requests and concerns regarding the processing of personal data)
- Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- Suspension and permanent exclusion
- Whistleblowing
- Staff grievances
- Staff discipline
- Withdrawal from the curriculum (parents and carers can withdraw their child from any aspect of religious education, including the daily act of collective worship. They do not have to explain why)

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

Complaints relating to personal data and information rights are subject to specific requirements under the Data Protection Act 2018 and will be managed in accordance with the Trust's Data Protection Policy and associated procedures. Individuals have a statutory right to complain under Section 164A of the Data Protection Act 2018. If dissatisfied with the Trust's response, they may complain to the Information Commissioner's Office (ICO).

Complainants who are not parents/carers should address their complaint to the Headteacher of the relevant school. Contact details for each school can be found in Appendix A of this policy.

Complaints about services provided by other providers who use school premises or facilities (for example, after school care provider) should be directed to the provider concerned.

4 Roles and responsibilities

4.1 The Complainant

The Complainant will receive a more effective and timely response to their complaint if they:

- Follow these procedures;
- Co-operate with the school throughout the process, and respond to deadlines and communication promptly;
- Ask for assistance as needed;
- Treat all those involved with respect;
- Respect confidentiality
- Do not approach individual Governors or directors about the complaint
- Do not publish details about the complaint on social media.

4.2 The Investigator

For formal complaints (Stage 2), an individual will be appointed to look into the complaint and establish the facts. This will usually be the Headteacher (or other person appointed by the Headteacher or COO for this purpose). They will:

- Interview all relevant parties, making written notes and keeping these securely;
- Carefully consider any relevant records information or evidence and keeping these securely
- Be mindful of the timescales to respond;
- Provide a comprehensive, open, transparent and fair consideration of the complaint
- Prepare a comprehensive report to the Headteacher/COO or which includes the facts and potential solutions and recommends courses of action to resolve problems.

The Investigator will:

- Keep the Headteacher/COO up to date at each Stage in the procedures
- Make sure the process runs smoothly by liaising with staff members, the Headteacher, Chair of Governors/Board of Directors, clerk/governance professional and COO/Chair of the Board as appropriate

The Investigator will also be aware of issues relating to:

- Sharing third-party information
- Additional support needed by Complainants – for example, interpretation support or where the Complainant is a child or young person
- Keeping records

4.3 Panel Chair (should the complaint reach Stage 3)

The Panel Chair will:

- Chair the meeting, ensuring that everyone is treated with respect and courtesy throughout;
- Make sure all parties see the relevant information, understand the purpose of the committee, and are allowed to present their case.
- Ensure that the Panel is open-minded and acts independently and no member of the committee has an external interest in the outcome of the proceedings or any involvement in an earlier Stage of the procedures

4.4 Clerk to the Local Governing Body/Board of Directors (should the complaint reach Stage 3)

The Clerk will:

- Be the contact point for the Complainant and the complaints Panel, including circulating the relevant papers and evidence before complaints committee meetings;
- Ensure that all people involved in the complaint procedures are aware of their legal rights and duties, including any legislation relating to school complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR)
- Set the date, time and venue of the complaints Panel meeting, ensuring that the dates are convenient for all parties (if they are invited to attend) and that the venue and proceedings are accessible
- Collect any written material relevant to the complaint and send it to the parties in advance of the meeting within an agreed timescale
- Record and circulate the minutes and outcome of the hearing.

5 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.

5.1 Timescales

The Complainant must raise the complaint within three [3] months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within three [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; however, this would be on a case-by-case basis.

We will use all reasonable endeavours to resolve any informal complaints within ten (10) school days of them being raised. 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;
- Where a complaint is under investigation, an update on progress will be given to the Complainant before the longer school holidays (Christmas/Easter/summer) where it has not been possible to complete the investigation before the break.

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or tribunals, this may impact on our ability to adhere to the timescales within this policy or result in the procedures being suspended until those public bodies have completed their investigations.

If a Complainant commences legal action against the Trust or the school in relation to their complaint, then we will consider whether to suspend the complaints procedures in relation to their complaint until those legal proceedings have concluded.

5.2 Complaints about Early Years (Reception and Nursery)

We will investigate all written complaints relating to early years and notify the Complainant of the outcome within **twenty-eight (28) calendar days** of receiving the complaint as set out in the Statutory framework for the early years foundation Stage. Please see our Early Years Policy (available on request or from our websites) for information about our early years provision.

The school will keep a record of the complaint (see section 11) and make this available to Ofsted on request.

If parents/carers are not satisfied with our response, they can contact Ofsted by calling 0300 123 4666 or by emailing enquiries@ofsted.gov.uk.

Schools will notify parents and carers if they become aware that they are to be inspected by Ofsted. Schools will also supply a copy of the inspection report card to parents and carers of children attending the setting on a regular basis.

6 Stages of complaint

6.1 Stage 1: Informal Resolution

Our schools will make every effort to address any concerns or complaints early through informal measures.

It may be the case that the provision or clarification of information will resolve the issue.

The Complainant should raise the concern as soon as possible with the relevant member of staff (for example, class teacher, SENDCO) or the Headteacher, 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 Complainant should also state what they feel might resolve the concern.
See Appendix A for contact details.

The school will acknowledge informal complaints within five [5] school days, and investigate and aim to provide a response within a further five [5] school days. The informal Stage may involve a meeting between the Complainant and the relevant member of staff.

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

6.2 Stage 2: Formal Complaint

The formal Stage involves the Complainant (or someone acting on their behalf) putting the complaint in writing to the Headteacher and/or the subject of the complaint in a letter or email.

The Complainant 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.

If Complainants need assistance raising a formal complaint, they can contact the school office. See Appendix A for contact details.

The Headteacher (or other person appointed by the Headteacher for this purpose) will formally acknowledge receipt of the complaint in writing within five [5] school days.

The Headteacher (or other person appointed by the Headteacher for this purpose) will then conduct their own investigation. The Investigator will arrange to meet with the Complainant or to speak with them by phone as part of the process.

The aim will be for the complaint to be investigated within ten [10] school days. On completion of the investigation, a written response outlining the outcome will be sent to the Complainant within five [5] school days. If the timescales set out in this policy cannot reasonably be met the Complainant will be advised of this is in writing with the reasons why this was not possible.

If the Complainant is not satisfied with the response and wishes to proceed to the next Stage of this procedure, they should inform the clerk to the governing body in writing within [10] school days from the date of their notification of the outcome of their complaint.

Formal complaints will be logged by each school. The school will track the number and nature of formal (Stage 2) complaints (see section 11).

6.2.1 Submitting complaints

Formal complaints can be raised:

- In a letter or email (this is preferred)
- Over the phone
- In person
- Through a third party acting on their behalf, if they have the Complainant's consent to do so

The Complainant should provide details such as relevant dates, times and the names of witnesses at events, alongside copies of any relevant documents. The Complainant should also state what they feel would resolve the complaint.

A complaints form is available for you to use (Appendix 1), and this can be downloaded in Word format for ease of use. The use of the form is optional but can be used to help you to set out the nature of your complaint.

6.2.1.1 Submitting a complaint about your child's school

Complaints about:

- Staff (except the Headteacher) should be directed to the Headteacher
- The Headteacher should be directed to the Chair of The Local Governing Body who will advise the COO
- The Chair of The Local Governing Body, any individual Governor or the whole Local Governing Body should be directed to the clerk/governance professional in the first instance, who will liaise with the COO.

Please submit any complaints **via the school office**, marked private and confidential (if made in writing). If Complainants need assistance raising a formal complaint, they can contact the school office. School contact details are included in this policy at Appendix 2.

6.2.1.2 Submitting a complaint about a Headteacher, Member of the Board of Directors, or Frays central team staff

As set out above, complaints about the Headteacher should be directed to the Chair of The Local Governing Body in the first instance, who will liaise with the COO regarding next steps.

Complaints regarding the Board of Directors or Frays central team staff should initially be addressed to the COO (contact details are provided in Appendix 2).

Complaints regarding Frays central staff should be addressed to the COO (see Appendix 2 for contact details). The COO will investigate complaints at Stage 2 or appoint a suitably skilled independent Investigator.

Complaints of this nature will be managed following the same procedures and timescales set out in section 6.

Depending on the nature of the complaint it may be deemed necessary to appoint another person to investigate your complaint. If this is the case, we will notify you.

For example, if the complaint is about the Headteacher, or a member of the Local Governing Body (including the Chair or Vice-Chair), the CEO will appoint the most appropriate person to investigate.

6.2.2 Investigation

6.2.2.1 Investigating a complaint about your child's school

The Complainant will receive written acknowledgement of their complaint within five [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.

The Headteacher will then conduct their own investigation and consider whether a face-to-face meeting is the most appropriate way of doing this. The Headteacher may delegate the investigation to another member of the school's senior leadership team but will not delegate the decision to be taken. The aim will be for the complaint to be investigated within ten [10] school days.

6.2.2.2 Investigating a complaint about a Headteacher, Member of the Board of Directors, or Frays central team staff

The Complainant will receive written acknowledgement of their complaint within five [5] school days.

Within this response the Investigator will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the Complainant would like to see.

They will then conduct their own investigation and consider whether a face-to-face meeting is the most appropriate way of doing this. The aim will be for the complaint to be investigated within ten [10] school days.

If the complaint is about the Headteacher another Headteacher or senior leader will be appointed by the CEO or COO to carry out the investigation.

If the complaint is about or a member of the Local Governing Body (including the Chair or vice-Chair), a suitable skilled Governor will be appointed to carry out the investigation by the COO.

Complaints about the Chair of the Local Governing Body will be escalated to the Chair of the Board of Directors via the COO or CEO.

Complaints about the Board of Directors will be directed to the Chair of the Board of Directors via the COO. Complaints about the Board of Directors will be directed to the Vice-Chair of the Board of Directors via the COO or CEO.

Complaints regarding Frays central team will be investigated by the COO or by a suitably skilled independent Investigator appointed by them.

6.2.2.3 Conclusion

The written conclusion of this investigation will be sent to the Complainant within five [5] school days of the completion of the investigation

.

If the person investigating is unable to meet this deadline, they will provide the Complainant with an update and revised response date.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions to be taken to resolve the complaint.

If the Complainant is not satisfied with the response and wishes to proceed to the next Stage of this policy, they should inform the Clerk to the Local Governing Body in writing within ten [10] school days from the date of their notification of the outcome of their complaint.

6.3 Stage 3: Complaints Panel Hearing

6.3.1 Convening the Panel

Complaints will be escalated to the Panel hearing Stage if the Complainant is not satisfied with the response to the complaint at the second, formal, Stage. The Clerk will acknowledge receipt of the complaint within five [5] school days and manage the process at Stage 3.

The Panel will be appointed by Frays Academy Trust and must consist of at least three people who were not directly involved in the matters detailed in the complaint. At least one Panel member must be independent of the management and running of the school. The Panel cannot be made up solely of governing body members from the school which is subject to the complaint, as they are not independent of the management and running of the school. A Governor from a Local Governing Body at a different school within Frays Academy Trust, who has no conflict of interest or prior knowledge of the complaint, can be an independent member. This is because such a person would have no direct involvement with the management and running of the school being complained about. The Panel will be made up of Directors and an independent Panel member if the complaint is:

- Jointly about the Chair and vice-Chair, or
- The entire Local Governing Body, or
- The majority of the Local Governing Body

The Panel will have access to the existing record of the complaint's progress (see section 11).

The Complainant must have reasonable notice of the date of the review Panel and efforts will be made to secure a mutually convenient date. However, if this has not proved possible in spite of reasonable efforts, the review Panel reserves the right to convene at its convenience rather than that of the Complainant. At the review Panel meeting, the Complainant and representatives from the school, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.

6.3.2 At the meeting

The meeting will be held in private. Electronic recordings of meetings or conversations will not normally be permitted unless a Complainant's own disability or additional needs require it. Prior knowledge and consent of all parties attending will be sought before meetings or conversations take place. Consent will be recorded in any minutes taken and parties should agree in advance to being recorded. Where recording is not for the purpose of a reasonable adjustment, any other requests will be considered on a case-by-case basis, to ensure that there is a fair and reasonable purpose for allowing Complainants to record meetings, as there may be various levels of identifiable personal information recorded. The following points will be considered:

- how any decision to allow recordings may affect any third parties called to act as witnesses;
- the impact and consequences on the individuals involved in the complaint in the event recordings are lost or shared publicly given that the process is confidential.

At the review Panel meeting, the Complainant and representatives from the school, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting.

The Complainant will be invited to attend the Panel hearing and be accompanied if they wish. We do not encourage either party to bring legal representation, but will consider it on a case-by-case basis. For instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by their union.

Representatives from the media are not permitted to attend.

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. Once the Complainant and school representative(s) have presented their cases, they will be asked to leave, and evidence will then be considered.

The Panel will then put together its findings and recommendations from the review. The Panel will also provide copies of the minutes of the hearing and the findings and recommendations to the Complainant and, where relevant, the individual who is the subject of the complaint, and make a copy available for inspection by the Trust and Headteacher.

6.3.3 The outcome

The review Panel can:

- Uphold the complaint, in whole or in part
- Dismiss the complaint, in whole or in part

If the complaint is upheld, the committee will:

- Decide the appropriate action to resolve the complaint
- Where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future

The Chair of the Panel will inform those involved of the decision in writing within ten [10] school days of the Panel hearing.

7 Referring complaints on completion of the procedures

If the Complainant is dissatisfied with the outcome of the school's complaints procedure, they can refer their complaint to the Department for Education (DfE). The DfE will check whether the complaint has been dealt with properly. The DfE will not overturn a Trust's decision about a complaint but will intervene if a school or Trust has:

- Breached a clause in its funding agreement
- Failed to act in line with its duties under education law
- Acted (or is proposing to act) unreasonably when exercising its functions

If the complaints procedure is found to not meet regulations, the school will be asked to correct its procedures accordingly.

For more information or to refer a complaint, see the following webpage on GOV.UK for how to complain about a school.

We will include this information in the outcome letter to Complainants.

8 Unreasonable, vexatious and persistent complaints

8.1 Unreasonable and vexatious complaints

Most complaints raised will be valid, and therefore we will treat them seriously. However, a complaint may become unreasonable if the person:

- Has made the same complaint before, and it has already been resolved by following the school's complaints procedure
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure
- Pursues a valid complaint, but in an unreasonable manner e.g. refuses to articulate the complaint, refused to co-operate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value
- Submits multiple versions of the same complaint using different AI-generated formats without adding new personal information (see section on AI generated complaints)
- Uses AI tools to generate complaints on behalf of groups of parents (see section on group complaints)

8.1.1 Steps we will take

We will take every reasonable step to address the Complainant's concerns, and give them a clear statement of our position and their options. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal (as outlined above) wherever possible.

It the Complainant continues to contact the school in a disruptive way, we may put communications strategies in place. We may:

- Give the Complainant a single point of contact via an email address;
- Limit the number of times the Complainant can make contact, such as a fixed number per term;
- Ask the Complainant to engage a third party to act on their behalf, such as Citizens Advice;
- Put any other strategy in place as necessary.

8.1.2 Stopping responding

We may stop responding to the Complainant when all of these factors are met:

- We believe we have taken all reasonable steps to help address their concerns;
- We have provided a clear statement of our position and the Complainant's options for example the right to contact the DfE as set out under paragraph 8);
- The Complainant contacts us repeatedly, and we believe their intention is to cause disruption or inconvenience.

Where we stop responding, we will inform the individual that we intend to do so. We will also explain that we will still consider any new complaints they make.

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from our school premises and ensuring appropriate measures of support are provided to staff where they are the subject of aggression and/or violence.

8.1.3 Duplicate complaints

If the school/Trust has resolved a complaint under this policy and receive a duplicate complaint on the same subject from a partner, family member or other individual, the school/Trust will assess whether there are aspects that we had not previously considered, or any new information we need to take into account.

If we are satisfied that there are no new aspects, we will:

- Tell the new Complainant that we have already investigated and responded to this issue, and the local process is complete;
- Direct them to the DfE if they are dissatisfied with our original handling of the complaint.

If there are new aspects, we will follow this procedure again. If a duplicate complaint is raised which in the view of the school warrants further consideration, the procedures outlined in section 6 or 7 (as appropriate) will be repeated.

8.2 Complaint campaigns

Where the school or Trust receives a large volume of complaints about the same topic or subject, especially if these come from Complainants unconnected with the school, the school may respond to these complaints by:

- Publishing a single response on the school/Trust website;
- Sending a template response to all of the Complainants.

If Complainants are not satisfied with the school's/Trust's response, or wish to pursue the complaint further, the normal procedures will apply.

9 Managing AI-Generated and Digitally Assisted Complaints

9.1 Our approach

We recognise that Complainants may use artificial intelligence (AI) tools or other digital assistance when drafting their complaints. We will treat all complaints seriously, regardless of how they are drafted. However, to ensure we can investigate complaints efficiently and effectively, we require all complaints to:

- Clearly identify the specific issue(s) being complained about
- Include relevant personal examples and details specific to the Complainant's circumstances
- State the outcome the Complainant is seeking
- Be submitted in a way that demonstrates the Complainant's personal understanding of the issue

If we receive a complaint that appears to be AI-generated or lacks sufficient personal detail, we may request that the Complainant:

- Re-submit the complaint in their own words
- Provide specific examples relevant to their child or their personal experience
- Clarify which aspects of a lengthy complaint they wish us to prioritise
- Confirm their understanding of the issues raised

This request will be made within five [5] working days of receiving the complaint. We will pause the formal complaints process until we receive the clarification needed to investigate effectively.

Where a complaint contains extensive AI-generated content that makes it difficult to identify the core concerns, we reserve the right to:

- Focus our investigation on the specific, personal concerns raised rather than responding to every point in a lengthy document

- Request a meeting or phone call to clarify the complaint
- Limit our response to addressing the key issues identified
- Set reasonable boundaries on the length and frequency of communications

This approach allows us to allocate our resources appropriately while ensuring genuine concerns are properly investigated.

A complaint may be considered unreasonable or vexatious if the Complainant:

- Refuses to clearly explain what their complaint is about, what the issue is, or what outcome they are hoping for, even when support is offered
- Submits multiple versions of the same complaint using different AI-generated formats without adding new personal information
- Uses AI tools to generate complaints on behalf of groups of parents (see section 9.5 on group complaints)
- Submits complaints that lack any personal detail or specific examples despite requests for clarification

In such cases, we may choose to close the complaint or limit our engagement in line with section 9 of this policy.

9.2 Use of AI in our responses

In the interests of efficiency, we may use AI tools to help draft responses to complaints. All responses will be reviewed and personalised by appropriate staff members before being sent to ensure accuracy and appropriateness.

10 Barring from the School Premises

Although fulfilling a public function, schools are private places. The public has no automatic right of entry. Schools will therefore act to ensure they remain a safe place for pupils, staff and other members of their community.

If a parent's behaviour is a cause for concern, a school can ask him/her to leave school premises. In serious cases, the Headteacher or the local authority can notify them in writing that their implied licence to be on school premises has been temporarily revoked subject to any representations that the parent may wish to make. Schools should always give the parent the opportunity to formally express their views on the decision to bar in writing.

At the parent's request, the decision to bar will be reviewed by a Governor Panel, taking into account any representations made by the parent, and either confirmed or lifted. If the decision is confirmed, the parent will be notified in writing, explaining how long the bar will be in place.

Anyone wishing to complain about being barred can do so, by letter or email, to the Headteacher or Chair of Governors. However, complaints about barring cannot be escalated to the Department for Education. Once the school's own complaints procedure has been completed, the only remaining avenue of appeal is through the Courts; independent legal advice must therefore be sought.

11 Record keeping and confidentiality

Each 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 and emails, and notes relating to meetings and phone calls.

Complaints material will be treated as confidential and held securely by each school and will be viewed only by those involved in investigating the complaint or on the review Panel.

In the case of complaints about the Trust or central staff, these records will be managed by the COO and will be stored securely by the Trust under restricted access.
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 through a Subject Access Request under the terms of the Data Protection Act 2018 and the UK GDPR, or where the material must be made available to Ofsted.

Records of complaints will be kept securely, only for as long as necessary and in line with data protection law, our privacy notices and the Trust's record retention schedule.

The details of the complaint, including the names of individuals involved, will not be shared with the whole Local Governing Body (or the Board of Directors) in case a review Panel needs to be organised at a later point.

Where the Local 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.

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 COO who will not unreasonably withhold consent.

12 Learning lessons

Each Local Governing Body will review any underlying issues raised by complaints with the Headteacher, 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.

The Board of Directors will receive regular reports on the types of complaints received in each school to support the development of appropriate support structures, and to inform any improvements to procedures or practice.

13 Monitoring arrangements

The complaints records are logged and managed by each of our schools. Each school will track the number and nature of formal (Stage 2) complaints, and review underlying issues as stated in section 11.

The CEO/COO will monitor the effectiveness of the complaints policy Trust wide.
This policy will be reviewed by the Chief Operating Officer every three years. At each review, the policy will be approved by the Board of Directors.

14 Links with other policies

Policies dealing with other forms of complaints include:

- Child Protection
- Data Protection
- Admissions
- Suspension and Permanent Exclusion
- Grievance
- Staff Discipline
- SEND
- Suspension and Permanent Exclusion
- Privacy notices
- Whistleblowing

Appendix 1 – Complaint Form

Please complete and return to the school who will acknowledge receipt and explain what action will be taken. This is optional and is available for you to use if it helps you to explain your complaint. It is also saved in Word format on our websites for ease of use.

<table>
<tr><td colspan="2">Your Name:</td><td colspan="2">Pupil's Name:</td></tr>
<tr><td colspan="2">Your Relationship to Pupil:</td><td colspan="2">Pupil's DOB and class:</td></tr>
<tr><td colspan="2" rowspan="2">Address and Postcode:</td><td colspan="2">Daytime Telephone Number:</td></tr>
<tr><td colspan="2">Evening Telephone Number:</td></tr>
<tr><td colspan="4">Full details of complaint (including the names of all persons involved and the dates of incidents referred to):</td></tr>
<tr><td colspan="4">What action, if any, have you already taken to try and resolve your complaint (for example, who did you speak to and what was the response)?</td></tr>
<tr><td colspan="4">What actions do you feel might resolve the problem at this Stage?</td></tr>
<tr><td colspan="4">Are you attaching any paperwork? If so, please give details.</td></tr>
<tr><td>Stage of complaint (please tick)</td><td>Stage 1 (informal)</td><td>Stage 2 (formal)</td><td>Stage 3 (review Panel)</td></tr>
<tr><td colspan="2">Signature:</td><td colspan="2">Date:</td></tr>
<tr><td colspan="4">For Office use:</td></tr>
<tr><td colspan="2">Date acknowledgement sent:</td><td colspan="2"></td></tr>
<tr><td colspan="2">Name of person complaint referred to:</td><td colspan="2"></td></tr>
<tr><td colspan="2">Signature:</td><td colspan="2">Date:</td></tr>
</table>

Appendix 2 – School and Frays Academy Trust Contact Details

To contact the Headteacher, the Chair of Governors or the Clerk please contact the relevant school and address your letter or email to the person you wish to contact:

All Saints Church of England Primary School and Nursery
Norreys Avenue
Wokingham
Berkshire
RG40 1UX
Telephone: 0118 978 7173
Email: admin@allsaints.wokingham.sch.uk

Beechwood Primary School
Ambleside Close
Woodley
Reading
RG5 4JJ
Telephone: 0118 969 5976
Email: office-beechwood@fraysacademytrust.org

Cowley St Laurence CE Primary School
Worcester Road
Cowley
UB8 3TH
Telephone: 01895 462 361
Email: cowleystl@fraysacademytrust.org

Keep Hatch Primary School
Ashridge Road
Wokingham
RG40 1PG
Telephone: 0118 978 4859
Email: admin@keephatch.wokingham.sch.uk

Laurel Lane Primary School
Laurel Lane
West Drayton
UB7 7TX
Telephone: 01895 462 360
E-mail Address: laurellane@fraysacademyTrust.org

St Matthew's CE Primary School
High Street
West Drayton
UB7 7QJ
Telephone: 01895 442 724
Email: stmatthews@fraysacademytrust.org

St Martin's CE Primary School
Rowan Road
West Drayton
UB7 7UF
Telephone: 01895 462 350
E-mail: stmartins@fraysacademytrust.org

To contact the Headteacher/CEO, the Chair of the Board of Directors, the Chief Operating Officer or the Clerk please use the contact details below and address your letter or email to the person you wish to contact:

Frays Academy Trust
Worcester Road
Cowley
UB8 3TH
Telephone: 01895 59 00 59
Email: office@fraysacademyTrust.org