



COMPLAINTS POLICY

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1. PURPOSE

- 1.1 The Girls' Learning Trust ("the Trust") is committed to addressing complaints fairly, efficiently, and in a timely manner. This policy outlines the procedures for handling complaints relating to the Trust, its schools, or any community services provided by the schools.
- 1.2 This policy applies to complaints from parents and carers of current students regarding the Trust, its schools, or any services they provide. Complaints from individuals who are not parents or carers will be considered under Section 14 (Complaints from Non-Parents). Anonymous complaints will not normally be investigated unless there are exceptional circumstances, such as safeguarding concerns, where the Trust may decide to take further action.
- 1.3 The Trust will endeavour to meet all time limits stated in this policy. Where it is not reasonably practicable to adhere to a specific timescale, the complainant will be informed of any revised deadlines.
- 1.4 This policy does not apply to the following matters, which are covered by separate Trust or school policies:
 - Admissions to schools
 - Statutory assessments of special educational needs
 - Matters likely to require a child protection investigation
 - Exclusions of children from school
 - Whistleblowing
 - Staff grievances
 - Staff conduct or performance (although an outcome of a complaint may be a referral to the relevant HR policy)
 - Complaints about services provided by third parties who may use the school premises or facilities
 - Withdrawal from the curriculum
- 1.5 Some complaints may involve multiple issues, individuals, or institutions, making them more complex to investigate and resolve. Where a complaint raises interrelated concerns or requires input from different parts of the Trust or external agencies, the following approach will be taken:
 - The Trust will designate a lead investigator to oversee the complaint and ensure a coordinated response.
 - Where appropriate, the complaint may be divided into separate elements, with each addressed by the relevant department or school.
 - If legal, safeguarding, or regulatory matters are involved, the Trust may pause or adapt the complaints process to comply with statutory obligations or ongoing investigations.
 - The complainant will be kept informed of progress and any necessary extensions to timescales.
- 1.6 It is expected that where a complaint relates to a student it will have been raised with the student's Form Tutor, Head of Year, Head of Department or member of the School Leadership Team before a request is made to deal with it under this policy.
- 1.7 The Trust recognises that some complainants may require additional support when accessing the complaints procedure. To ensure fair and equal access, reasonable adjustments will be made for complainants with disabilities, communication difficulties, or other access needs. Adjustments may include, but are not limited to:
 - Providing documents in alternative formats.

- Accepting complaints verbally or through an advocate where required and where agreed in advance.
- Ensuring meeting locations are physically accessible or offering remote meeting options.
- Offering translation or interpretation services where necessary.

Complainants requiring adjustments should contact the relevant school as soon as possible so that appropriate support can be arranged.

2. LEGISLATION AND GUIDANCE

This policy is based on the following legislation and guidance:

- Education Act 2002: Establishes the duty of schools to have a complaints procedure in place.
- Education (Independent School Standards) Regulations 2014: Sets out the requirement for academies and multi-academy trusts to have a published complaints policy and to maintain records of complaints.
- Freedom of Information Act 2000: Governs the public's right to access information held by public bodies, including schools and trusts.
- UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018: Ensures that all personal data involved in a complaint is handled securely and lawfully.
- Equality Act 2010: Requires the Trust to ensure that its complaints process is accessible to all and does not discriminate against individuals based on protected characteristics.
- Education and Skills Act 2008 (Section 109): Provides inspection bodies, such as Ofsted, with the authority to review how complaints are handled in schools.
- Department for Education (DfE) Best Practice Guidance for Academies Complaints Procedures (2021): Provides recommendations on ensuring an effective and fair complaints process.

This policy should be read alongside other relevant Girls' Learning Trust policies, including:

- Safeguarding and Child Protection Policy
- Whistleblowing Policy
- Staff Grievance Policy
- Staff Disciplinary Policy
- Data Protection and FOI Policy
- School Admissions Policies
- Governance Code of Conduct

3. ROLES AND RESPONSIBILITIES

Trust Board

The Trust Board holds overall accountability for ensuring that the complaints process is clear, fair, and operates in line with legal requirements. It oversees the effective implementation of this policy across all schools within the Trust. The Board also considers complaints at the final stage of the process if they escalate to a Complaints Panel Hearing. The Chair of the Trust Board is responsible for handling complaints that relate to the Chief Executive Officer (CEO), the Trust Board, or Local Governing Bodies (LGBs).

Chief Executive Officer (CEO)

The Chief Executive Officer (CEO) has overall responsibility for the complaints process across the Trust, ensuring consistency and compliance. The CEO investigates complaints that reach Stage Two, appointing an appropriate investigator where required. They also ensure that patterns of complaints are monitored and that any recurring issues are addressed at a strategic level.

Headteacher

Each Headteacher is responsible for the effective handling of complaints within their school. They investigate complaints at Stage One, working to resolve concerns promptly and fairly. The Headteacher ensures that all complaints are managed in line with the policy and that records are maintained. If a complaint cannot be resolved at the school level, the Headteacher facilitates its escalation to the CEO.

School Senior Leadership Team (SLT)

The Senior Leadership Team (SLT) supports the complaints process by investigating complaints at Stage One, where delegated by the Headteacher. They ensure that investigations are thorough, fair, and conducted within the timescales outlined in this policy. They may also meet with complainants to discuss concerns and possible resolutions.

Local Governing Bodies (LGBs)

Although Local Governing Bodies (LGBs) do not routinely handle complaints, they may become involved where the CEO designates a Local Governing Body member to investigate a Stage Two complaint. Where a complaint is made about an individual LGB member, the Chair of the Trust Board will determine the appropriate course of action.

Clerk to the Trust Board

The Clerk to the Trust Board plays an administrative role in the complaints process, ensuring that requests for a Stage Three (Complaints Panel Hearing) are received and managed appropriately. They coordinate the panel hearing, ensuring that it includes at least one independent panel member. The Clerk also ensures that accurate records of complaints and panel decisions are maintained and communicated to all relevant parties.

All Staff

All staff within the Trust have a role in supporting the complaints process. They should direct complaints to the appropriate person, maintain confidentiality, and contribute to resolving concerns informally where possible. Staff are expected to act professionally and in accordance with this policy when handling any complaints raised by students, parents, carers, or members of the community.

4. TIMING FOR MAKING A COMPLAINT

Complaints should be made as soon as possible after the relevant matter arises and no later than 20 school days afterward. However, the Trust will consider exceptional circumstances when deciding whether to accept a complaint beyond this deadline.

5. INFORMAL RESOLUTION

A **concern** is an expression of worry or doubt about an issue that is important to the individual raising it, where reassurance or clarification is sought. A **complaint** is an expression of dissatisfaction about an action taken, or a lack of action, that requires a formal response.

The Trust encourages concerns to be raised at the earliest opportunity, as many issues can be resolved informally without the need for a formal complaint. Each school within the Trust takes concerns seriously and will make every effort to address them promptly.

If a complainant finds it difficult to discuss a concern with a particular member of staff, alternative arrangements can be made. In such cases, the Headteacher (or a designated senior member of staff) will facilitate communication with another appropriate staff member. It is important that any concern is handled impartially and objectively, rather than necessarily by a more senior individual.

Where an informal resolution is not possible, or if the individual wishes to escalate their concern formally, the complaints procedure outlined in this policy should be followed.

6. SCOPE, FORMAT AND MANAGEMENT OF COMPLAINTS

6.1 Defining the Complaint

In order to ensure that complaints can be considered fairly, efficiently and proportionately, the Trust may require complainants to define the scope of their complaint before it is accepted into the formal procedure. The complaint should clearly identify:

- The matter being complained about.
- The relevant facts.
- The outcome sought.
- The evidence on which the complainant wishes to rely.

The complaints procedure is intended to consider specific concerns, not to provide a general review of all decisions, communications or actions relating to a student, parent, member of staff, school or the Trust.

6.2 Clarifying or Narrowing the Complaint

Where a complaint is unclear, excessively broad, contains multiple unrelated issues, or includes a substantial volume of material, the Trust may ask the complainant to clarify or narrow the complaint before it is progressed. This may include asking the complainant to:

- Identify the specific issues to be investigated.
- Separate unrelated matters.
- Confirm which documents or evidence are directly relevant.
- Explain the outcome they are seeking.
- Remove material that is duplicated, excessive or not relevant to the complaint.

Where a complainant does not provide reasonable clarification, the Trust may decide that the complaint cannot be progressed, or may define the scope of the complaint itself based on the information available.

6.3 Limits on Submissions and Supporting Material

The Trust may set reasonable limits on written submissions and supporting documents at any stage of the complaints process. This may include word limits, page limits, limits on the number of supporting documents, or deadlines for the submission of evidence.

Any such limits will be applied fairly and proportionately, taking account of the nature and complexity of the complaint. The purpose of these limits is to ensure that the complaint can be considered properly, without the process becoming unmanageable, disproportionate or unfair to those involved.

6.4 Material that may be Disregarded

The Trust is not required to consider material that is:

- Excessive.
- Duplicated.
- Irrelevant to the complaint.
- Abusive, discriminatory or inappropriate.
- Submitted outside agreed deadlines.

- Speculative or unsupported by evidence.
- Related to new issues that have not previously been raised through the appropriate stage of the procedure.

The investigator or panel may disregard such material where it is reasonable to do so.

6.5 Document Requests and Disclosure

This complaints procedure is an internal school and Trust process. It is not a legal process, a court process, or a process of formal disclosure. The purpose of the procedure is to enable the Trust or school to consider the complaint fairly, proportionately and efficiently, based on the relevant evidence needed to understand and determine the issues raised.

Complainants may request documents which they consider relevant to their complaint. However, the Trust is not required to provide unrestricted access to records, correspondence, internal notes, emails, policies, staff communications, student information or other documents simply because they have been requested. The Trust will decide what information is reasonably necessary for the proper consideration of the complaint.

When considering a request for documents, the Trust will take account of:

- Relevance to the agreed scope of the complaint.
- Proportionality.
- Confidentiality.
- Data protection requirements.
- Safeguarding considerations.
- Legal privilege.
- The rights and privacy of students, parents, staff and other third parties.

The Trust may decline document requests that are excessive, speculative, duplicated, disproportionate, irrelevant to the agreed scope of the complaint, or which appear to be intended to widen the complaint beyond the issues previously raised. The complaints process should not be used as a means of conducting a broad evidence-gathering exercise, cross-examining staff, or turning a Stage Three Panel into a legal-style hearing.

Where documents are relied upon by the school or Trust in responding to the complaint, relevant extracts or summaries may be provided where appropriate. The Trust may redact information where necessary to protect personal data, confidential information, safeguarding information, legal advice, or information relating to other students, parents, staff or third parties.

Requests for personal data or wider information rights will be handled separately under the Trust's Data Protection and Freedom of Information procedures, where applicable. The existence of a complaint does not alter the statutory framework for such requests, nor does it require the Trust to treat the complaints process as a substitute for those processes.

6.6 New Issues and Expansion of Complaints

Once a complaint has entered the formal procedure, the complainant may not amend, expand or reframe the complaint as it progresses through the stages, unless the Trust agrees that the additional material is directly relevant to the original complaint and necessary for a fair consideration of the matter.

Stage Two and Stage Three are not opportunities to introduce new complaints that could reasonably have been raised earlier. Where new issues are raised, the Trust may decide to:

- Disregard them for the purposes of the current complaint.
- Ask the complainant to submit them as a separate complaint.
- Consider them only where they are directly connected to the original complaint and necessary for fairness.

6.7 Reasonable Adjustments

These provisions will not prevent the Trust from making reasonable adjustments for complainants who require additional support to access the complaints process. Where appropriate, the Trust may adapt communication methods, formats or timescales while still maintaining reasonable boundaries around the scope and volume of material submitted.

Reasonable adjustments are intended to support fair access to the complaints process. They do not remove the need for the complaint to be clearly defined, relevant evidence to be proportionate, and submissions to remain within the agreed scope of the complaint.

6.8 Final decision on Process Management

The Trust will make decisions about scope, format, document requests, deadlines and supporting material fairly and reasonably. The relevant investigator, the Chief Executive Officer, the Chair of the Trust Board, the Clerk to the Trust Board, or the Stage Three Panel may make procedural decisions where necessary to ensure that the complaint is managed effectively.

Where a procedural decision is made, the complainant will be informed of the decision and the reason for it, where appropriate.

7. STAGE ONE INVESTIGATIONS

- 7.1 *Making a Stage One Complaint:* a Stage One complaint must be submitted in writing to the Headteacher of the relevant school. It should clearly outline the facts, provide supporting evidence, and specify what the complainant believes should have been done differently or where the school has not complied with the relevant policy. The complainant must cooperate with the investigation and cannot amend the complaint once it progresses through the stages defined in this policy. If the Headteacher believes that the complaint is identical in nature to one already considered at the informal stage, they may refer the complaint to the CEO to consider under Stage Two immediately.
- 7.2 *Investigation Process:* the Headteacher will either investigate it or appoint a member of the school's Senior Leadership Team to investigate it, which may include offering a meeting with the complainant. The investigator will speak to relevant individuals, and if appropriate, the meeting will take place within 15 school days of receiving the written complaint.
- 7.3 *Outcome and Response:* the investigator will provide written findings, including any steps to resolve the issue, within 15 school days of the investigation meeting with the complainant. If no meeting is held, the response will be issued within 15 school days of receiving the written complaint.
- 7.4 If the complainant remains dissatisfied with the outcome, they may escalate the complaint to Stage Two. This request must be submitted in writing to the Chief Executive Officer within 10 school days of receiving the Stage One findings.

Complaints against Senior Staff and those in Governance Roles

7.5 Stage One complaints about the following senior staff and those in governance roles will be handled in accordance with the table set out in Section 15 of this policy:

- i. Headteachers
- ii. Other members of the Executive Leadership Team of the Trust
- iii. Chief Executive Officer (CEO)
- iv. Local Governing Body (LGB) member
- v. Trustee
- vi. Chair of Trust Board
- vii. Entire Local Governing Body
- viii. Entire Trust Board
- ix. Members of the Trust

8. STAGE TWO INVESTIGATIONS

- 8.1 *Purpose:* Stage Two is not intended to be a complete re-investigation of the original complaint or a repeat of the Stage One process. Its purpose is to consider the complainant's reasons for remaining dissatisfied with the Stage One outcome and to determine whether the Stage One investigation and response were reasonable, fair, evidence-informed and consistent with this policy. The Stage Two investigator may make further enquiries where necessary, but this will be for the purpose of testing the Stage One outcome and addressing the specific grounds of dissatisfaction, rather than reopening every aspect of the original complaint.
- 8.2 *Submitting a Stage Two Complaint:* a Stage Two complaint must be submitted in writing to the Chief Executive Officer (CEO) of the Trust. It should clearly outline the areas of dissatisfaction with the Stage One outcome, provide any relevant supporting evidence, and specify what the complainant believes should have been done differently. The complainant must continue to cooperate with the investigation, and no amendments can be made to the complaint as it progresses through the stages outlined in this policy.
- 8.3 *Investigation Process:* the CEO will investigate the complaint or appoint a member of the Trust Board or the Local Governing Body of the relevant school to investigate it. This may include offering a meeting with the complainant, which will take place within 15 school days of receiving the written complaint. This may be supported by an independent investigator where appropriate.
- 8.4 *Outcome and Response:* the investigator will provide written findings, including any steps to resolve the issue, within 15 school days of any investigation meeting with the complainant. If no meeting is held, the response will be issued within 15 school days of receiving the written complaint.
- 8.5 If the complainant remains dissatisfied with the outcome, they may escalate the complaint to a Stage Three Panel. This request must be submitted in writing to the Chief Executive Officer and Clerk to Trust Board within 10 school days of receiving the Stage Two findings.

Complaints against Senior Staff and those in Governance Roles

8.6 Stage Two complaints about the following senior staff and those in governance roles will be handled in accordance with the table set out in Section 15 of this policy:

- i. Headteachers
- ii. Other members of the Executive Leadership Team of the Trust
- iii. Chief Executive Officer (CEO)

- iv. Local Governing Body (LGB) member
- v. Trustee
- vi. Chair of Trust Board
- vii. Entire Local Governing Body
- viii. Entire Trust Board
- ix. Members of the Trust

9 STAGE THREE PANEL CONSIDERATION

9.1 The Complaints Panel

A Complaints Panel will be convened as required to review complaints that have been escalated to Stage Three. The panel must consist of at least three members, including at least one person who is entirely independent of the Trust's management and governance, approved by the Chair of Trustees. Other members shall be drawn from:

- The Local Governing Body of the school where the complaint originated.
- The Local Governing Body from another school within the Trust.
- The Trust Board.
- The Members.

No panel member should have been directly involved in any aspect of the complaint under review.

9.2 School's Response and Meeting Arrangements

The Clerk to the Trust Board will request a written response from the school regarding the complaint, which must be provided within 15 school days. Once received, the Clerk will arrange a Complaints Panel meeting at a mutually convenient time for the complainant, the school, and the panel members. Wherever possible, the meeting will be scheduled within 15 school days of receiving the school's response.

The complainant may be accompanied by a friend but not by legal representation. The meeting will be conducted as informally as circumstances allow.

9.3 Stage Three Documentation

At Stage Three, the Panel will normally consider:

- The original complaint.
- The Stage One response.
- The Stage Two request and response.
- The complainant's written reasons for remaining dissatisfied.
- The school or Trust's written response to the Stage Three request.
- Any supporting information that the Panel considers relevant and proportionate.

The Panel is not required to consider extensive bundles of documents, late submissions, repeated correspondence, or material that does not assist with determining the complaint. The Panel may decide the weight to give to any material submitted.

9.4 Conduct of the Meeting

The purpose of the meeting is to review the complaint fairly, not to conduct a legal hearing:

- The complainant will have the opportunity to explain their dissatisfaction but may not introduce new issues that were not previously raised in writing.
- The school or Trust representatives will present their response.

- Both the complainant and the school/Trust may ask questions, as may panel members.
- The complainant will be given the opportunity to make final comments before the panel concludes.

The Stage Three Panel will consider whether the complaint has been handled properly through the earlier stages of the procedure; it is not a fresh investigation of the original complaint or a rehearing of all matters considered at Stage One and Stage Two.

9.5 Findings and Recommendations

The panel may make findings and recommendations, which will be:

- Sent electronically or otherwise provided to the complainant and, where relevant, to the individual being complained about.
- Made available for inspection on the school premises by the Trust, the Headteacher, and the Chief Executive Officer.

The panel will aim to finalise its response within 10 school days. The Clerk will notify all relevant parties of the outcome.

9.6 Attendance Requirement

The complainant will be offered three possible dates for the hearing. If they fail to confirm attendance for any of these or do not attend without a valid reason, the panel will not proceed, and the complaint will not be heard.

Any further attempt to re-open the matter will be considered under the provisions in section 9 of this policy.

9.7 Complaints About Senior Staff and those in Governance Roles

Stage Three panels about the following senior staff and those in governance roles will be handled in accordance with the table set out in Section 15 of this policy:

- i. Headteachers
- ii. Other members of the Executive Leadership Team of the Trust
- iii. Chief Executive Officer (CEO)
- iv. Local Governing Body (LGB) member
- v. Trustee
- vi. Chair of Trust Board
- vii. Entire Local Governing Body
- viii. Entire Trust Board
- ix. Members of the Trust

Panels should follow the same process outlined in this stage, including reviewing written submissions, inviting the complainant to a meeting, and ensuring fairness in the proceedings.

10 SERIAL OR VEXATIOUS COMPLAINTS

10.1 The Trust is committed to handling all complaints fairly and impartially while providing a high-quality service to complainants. In most cases, there will be no restrictions on complainants' contact with our schools. However, staff should not have to tolerate unacceptable behaviour. The Trust will take action to protect staff from any behaviour that is abusive, offensive, or threatening.

10.2 The Trust defines a vexatious complaint as one that disrupts the complaints process due to the

frequency, nature, or manner of the complainant's interactions with the school. A complaint may be deemed vexatious if the complainant:

Failure to Engage Constructively

- Does not clearly state the complaint, its grounds, or the desired outcome, despite offers of assistance.
- Refuses to cooperate with the complaints investigation process.
- Challenges matters that fall outside the scope of the complaints procedure.
- Alters the basis of the complaint as the investigation progresses.
- Refuses to accept the outcome of a properly conducted investigation, including referrals to the Department for Education.

Unreasonable or Disruptive Conduct

- Places excessive demands on school staff through frequent, lengthy, or complex contact in person, by phone, or in writing.
- Raises a disproportionate number of trivial, excessive, or irrelevant issues, expecting formal consideration.
- Raises an unreasonable number of questions, demanding immediate and detailed responses to minor issues.
- Insists on procedures that are unreasonable or incompatible with the complaints policy and best practice.
- Seeks an unrealistic or disproportionate outcome that is beyond the school's reasonable control.

Inappropriate Behaviour Towards Staff

- Engages in threatening, intimidating, abusive, offensive, or discriminatory behaviour towards staff (including verbal, written or physical).
- Unjustifiably criticises staff involved in handling the complaint and seeks their removal.
- Knowingly provides false or misleading information.

Public or Social Media Misuse

- Posts defamatory, misleading, or inappropriate content about the complaint on social media or public forums. This includes 'closed' social media platforms such as WhatsApp.

Addressing Vexatious Complaints

10.3 Where a complaint is deemed vexatious, the Trust reserves the right to limit or cease further communication on the matter, in accordance with this policy. The decision to stop responding will only be made if the following conditions are met:

- Every reasonable step has been taken to address the complainant's concerns.
- The complainant has been provided with a clear statement of the Trust's position and available options.
- The complainant continues to make repeated contact, raising substantially the same points each time.

Additionally, the case for ceasing communication is strengthened if:

- The complainant's communication is persistently abusive or aggressive.
- They make personal, insulting remarks about staff or issue threats.
- Their contact appears intended to cause disruption or inconvenience.

- 10.4 Whenever possible, the Headteacher, CEO, or Chair of the Trust Board will attempt to address concerns informally before designating a complaint as vexatious. If the behaviour continues, the complainant will receive a written explanation stating that their conduct is unreasonable and requesting that they change their approach.
- 10.5 For complainants who continue to make excessive contact, causing significant disruption, the Trust may implement a communication protocol, which may include:
- Restricting the complainant to a single point of contact via a designated email address.
 - Limiting the number of times they can make contact within a given period, such as a fixed number per term.
- 10.6 The implementation of a communication protocol will be reviewed after six months. However, any new complaint will be considered separately to ensure a fair and reasonable approach.
- 10.7 If a complainant's behaviour escalates to the point that may constitute harassment, the Trust will seek legal advice. In cases where individuals persist despite all reasonable measures, legal actions such as injunctions or court orders may be pursued to prevent further disruption.
- 10.8 Although the Trust's schools fulfil a public function, they remain private property, and the public does not have an automatic right of entry. If a complainant's behaviour becomes a cause for concern, the Headteacher may request that they leave the premises. In serious cases, the Trust may bar the individual from entering school premises entirely.
- 10.9 Before making such a decision, the complainant will be given an opportunity to formally express their views. The decision to bar will then be reviewed by the Chief Executive Officer and Chair of the Local Governing Body, considering any representations made. If confirmed, the complainant will receive written notification stating:
- The duration of the bar.
 - When the decision will be reviewed.

11 COMPLAINT OUTCOMES

- 11.1 The Trust is committed to ensuring that all complaints are resolved fairly, transparently, and in a timely manner. The possible outcomes of a complaint at any stage of the process may include, but are not limited to:
- Complaint Upheld: the complaint is fully upheld, meaning the Trust or school acknowledges that the issue raised was valid. Appropriate actions will be taken to address the issue and prevent recurrence.
 - Complaint Partially Upheld: some aspects of the complaint are upheld, while others are not. In such cases, the response will explain which parts of the complaint were valid and outline any corrective measures.
 - Complaint Not Upheld: the complaint is not upheld, meaning there is insufficient evidence to support the claims, or the Trust or school has acted appropriately within policies and procedures. A clear explanation will be provided.
 - Complaint Withdrawn: the complainant chooses to withdraw their complaint at any stage of the process.
 - No Further Action: after review, it may be determined that no further action is required, particularly if the matter has been resolved informally or falls outside the scope of this policy.

Actions Following a Complaint

11.2 Where a complaint is upheld or partially upheld, the Trust or school will take appropriate action, which may include:

- An apology and acknowledgment of any errors.
- A review or change in policies or procedures.
- Additional staff training or guidance to prevent recurrence.
- Further investigation or referral to another relevant policy.

Finality of Complaint Outcomes

11.3 Once a complaint has been fully considered through all stages of this policy, the outcome will be considered final. Complainants who remain dissatisfied may be directed to external bodies, such as the Department for Education (DfE) or Ofsted, where applicable.

12 MULTIPLE COMPLAINTS ABOUT THE SAME ISSUE

Occasionally, the Trust or its schools may become the focus of a campaign, receiving a large volume of complaints that:

- Are based on the same subject.
- Originate from complainants who are unconnected with the school.

In such cases, the Trust may implement a streamlined process to manage these complaints efficiently while ensuring transparency and consistency in responses. This process may include:

- Template Responses: sending a standardised response to all complainants addressing the concerns raised.
- Public Statements: publishing a single response on the Trust or relevant school's website to provide clear and accessible information.
- Referral to the Department for Education: complainants who remain dissatisfied will continue to be signposted to the Department for Education for further consideration.

This approach ensures that resources are allocated effectively while maintaining a fair and transparent complaints process. Any alternative complaint campaign management procedure will be explicitly stated on the Trust or school website.

13 RECORD KEEPING

A written record will be kept of all complaints that were resolved at the formal stage of the complaints procedure. Records will contain details of whether the complaint was resolved at Stage One, Stage Two or whether it proceeded to a Stage Three panel hearing. The action taken by the School or the Trust as a result of a complaint (regardless of whether they are upheld) will also be recorded.

14 DATA PROTECTION AND CONFIDENTIALITY

14.1 The Trust is committed to ensuring that all personal data collected, stored, and processed during the complaints procedure complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Any personal information provided as part of a complaint will be:

- Collected and processed lawfully, ensuring fairness and transparency.

- Used only for the purpose of handling the complaint and any necessary follow-up actions.
- Kept secure and confidential, with access limited to those involved in investigating or resolving the complaint.
- Retained only for as long as necessary, in accordance with the Trust's Records Management Policy.

14.2 A written record will be kept of all complaints that progress to the formal stages of this policy, including whether they were resolved at Stage One, Stage Two, or escalated to a Stage Three Panel hearing. Records will also document any actions taken by the Trust or school in response to complaints, regardless of whether they were upheld.

14.3 Complaint records will be retained securely for six years from the date of resolution, in line with the Trust's Records Retention Schedule. However, if a complaint relates to safeguarding concerns, records may be retained for a longer period in accordance with statutory safeguarding requirements.

Confidentiality and Data Sharing

14.4 While the Trust will make every effort to keep complaints confidential, information may need to be shared in certain circumstances:

- Internal Investigations: relevant staff may need access to complaint details to conduct a fair investigation.
- External Authorities: if the complaint involves safeguarding, legal, or regulatory concerns, information may be shared with Ofsted, the Department for Education (DfE), police, or local authority safeguarding teams.
- Independent Review Panels: if a complaint is escalated, details will be shared with the Stage Three Complaints Panel, including at least one independent panel member.

14.5 Correspondence, statements, and records relating to complaints will remain confidential, except where disclosure is required by law, regulatory authorities, or legal proceedings.

14.6 Complainants have the right to access and manage their personal data under UK GDPR. This includes the right to:

- Request access to personal data held in relation to a complaint (Subject Access Request).
 - Request corrections if any data is inaccurate.
 - Request erasure of data, unless there is a legal obligation to retain it.
 - Object to certain forms of data processing related to their complaint.
- All data-related requests should be submitted in writing to the Trust's Data Protection Officer (DPO), who will respond in accordance with statutory timeframes.

15 COMPLAINTS FROM NON-PARENTS

15.1 Complaints from individuals who are not parents, carers, or guardians of a student at a Girls' Learning Trust school will follow a simplified two-stage process:

15.2 Stage One: Informal Resolution

Non-parents should raise their concern directly with the relevant school or Trust department. Wherever possible, the complaint will be addressed informally through discussion, clarification, or a meeting with the appropriate staff member. A response will typically be provided within 10 school days.

15.3 Stage Two: Formal Complaint

If the issue remains unresolved, the complainant may submit a formal complaint in writing to the Headteacher (for school-related matters) or the Chief Executive Officer (for Trust-wide matters). Where the complaint is regarding the Headteacher, this should be submitted to the Chief Executive Officer. Where the complaint is regarding the Chief Executive Officer, this should be submitted to the Chair of Trust Board. An investigation will be conducted, and a written response provided within 15 school days.

- 15.4 There is no right to escalate non-parent complaints to a Stage Three Panel. If the complainant remains dissatisfied, they may refer the matter to an external body where applicable.

16 SUMMARY TABLE FOR SENIOR STAFF AND THOSE IN GOVERNANCE ROLES

Type of Complaint or Subject of Complaint	Stage One Investigator	Escalation to:	Stage Two Investigator	Escalation to:	Stage Three Panel
Parent Complaint about the School or Trust	Headteacher	Chief Executive Officer	Chief Executive Officer	Chief Executive Officer and Clerk to Trust Board	1 x Independent Member 2 x Trustee or LGB Member
Headteacher or an ELT member	Chief Executive Officer	Chief Executive Officer and Chair of Trust Board	Chair of Trust Board or another Trustee	Chair of Trust Board	1 x Independent Member 2 x Trustee or LGB Member
Chief Executive Officer	Chair of Trust Board or another Trustee	Chair of Trust Board	An independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Trustee or LGB Member
Local Governing Body Member	Chair of Trust Board or another Trustee	Chair of Trust Board and Clerk to Trust Board	Another Trustee or an independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Trustee or LGB Member
Trustee	Chair of Trust Board or another Trustee	Chair of Trust Board and Clerk to Trust Board	Another Trustee or an independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Trustees
Chair of Trust Board	Vice Chair of Trust Board	Vice Chair of Trust Board and Clerk to Trust Board	Another Trustee or an independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Trustees
Entire LGB	Chair of Trust Board	Chair of Trust Board and Clerk to Trust Board	Another Trustee or an independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Trustees
Entire Trust Board	Chair of Trust Board	Lead Member of the Trust through: Chair of Trust Board, Clerk to Trust Board and Chief Executive Officer	An independent investigator and move immediately to Stage Three Panel		1 x Independent Member 2 x Members of the Trust
Members of the Trust	Chair or Vice Chair of Trust Board	Chair or Vice Chair of Trust Board and Clerk to Trust Board	An independent investigator and move immediately to Stage Three Panel		3 x Independent Members