

COMPLAINTS POLICY  Evergreen School	
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Author and Reviewer	WSF MAT Executive Team
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#### 1. Introduction

- 1.1 Evergreen School and the Warwick Schools Foundation Multi Academy Trust (the **Trust**) is committed to delivering the highest standards of education and care for all our pupils. We believe that strong, open relationships with parents, carers, and the wider community are vital to the success and wellbeing of our school communities. While we strive to ensure all aspects of school life meet expectations, we understand that concerns or complaints may occasionally arise.
- 1.2 The Complaints Policy (the **Policy**) sets out the procedure to follow when raising a concern or complaint, ensuring it is handled fairly, promptly, and transparently. We are committed to resolving issues at the earliest possible stage, valuing all feedback as an opportunity to reflect, learn, and continually improve.
- 1.3 The Policy is designed to:
  - Encourage the prompt and informal resolution of concerns at the earliest possible stage
  - Ensure that all concerns and complaints are dealt with objectively, thoroughly, and within reasonable timescales
  - Provide a clear and accessible process for complainants to follow
  - Promote positive relationships between schools, parents, carers, and the wider community, even when issues arise
  - Enable the school to learn from complaints and continuously improve the quality of education and services it provides
- 1.4 We are committed to ensuring that all complainants are given the opportunity to follow the complaints procedure to completion. To support this, this Policy is publicised appropriately and is available on the school website.
- 1.5 Separate complaints procedures may apply where statutory guidance or other regulations are in place (see section 3).
- 1.6 We ask that all communications remain respectful and constructive. Staff, pupils, and complainants alike should feel safe and supported throughout any complaints process.

### 2. Legislation and guidance

- 2.1 This document meets the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014 and section 35 of the schedule to the Education (Non-Maintained Special Schools) (England) Regulations 2011, which state that the Trust and its schools must have and make available a written procedure to deal with complaints from parents/carers.
- 2.2 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 (EYFS) requirements.
- 2.3 It is also based on best practice guidance for academies complaints procedures published by the Education and Skills Funding Agency (ESFA).
- 2.4 This Policy complies with our funding agreement and articles of association.

# 3. Scope of the Policy

- 3.1 Some types of complaints fall outside the scope of this policy because they are covered by separate statutory procedures. In such cases, the complainant will be directed to the appropriate process.
- 3.2 The following issues are not covered by this Complaints Policy:

Issue	How it is dealt with
Admissions to schools	Please refer to the school's Admissions Policy and the relevant Local Authority's admissions appeal procedures.
Exclusions of pupils	Governed by the statutory guidance set out in the DfE's Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England. Appeals are heard by an independent panel.  See https://www.gov.uk/school-behaviour-exclusions/exclusions
Special Educational Needs (SEN) assessments	Complaints about Education, Health and Care (EHC) needs assessments or plans should be directed to the Local Authority, not the Academy Trust or the school.
	Arrangements for handling complaints from parents of children with Special Educational Needs (SEN) about the school's support are within the scope of this policy, although further detail about first raising concerns about SEN support is also outlined in the Trust's SEND Policy.
Safeguarding and child protection	Concerns that indicate a child may be at risk of harm should be reported immediately to the Designated Safeguarding Lead (DSL) at the school. Child protection matters will be handled in line with the Trust and the school's Safeguarding and Child Protection Policy and in accordance with other relevant statutory guidance.
	General complaints about how safeguarding matters were handled may be considered under the Complaints Policy.
Staff grievances	These are dealt with under the Trust's internal grievance procedures.
Staff conduct or capability	These are managed through the Trust's HR policies and procedures and not through this policy, although general complaints about how such matters were handled may be considered.
	If at any formal stage of the complaint, it is determined that staff disciplinary or a capability process is necessary, the details of this action will remain confidential to the Head/individual's line manager, and the complainant is not entitled to participate in the proceedings or receive any detail about them.
Whistleblowing	The Trust has a separate Whistleblowing Policy for concerns about wrongdoing or unethical behaviour by staff or leadership.
Complaints about the curriculum	Must be addressed in accordance with the Education Act 2002.
Data Protection or Freedom of Information requests	Managed under separate policies in line with UK GDPR and the Freedom of Information Act 2000. Appeals or complaints about data

Issue	How it is dealt with
	protection and handling can be made to the Information Commissioner's Office (ICO).
·	These should be raised under internal HR policies such as the Grievance Policy.
	Where a complaint concerns a third party used by the Trust or a school, complaints should be raised under the provider's own complaints procedure.

- 3.3 If a complaint is received that falls under one of the above categories, the Trust/school will advise the complainant of the correct procedure and, where appropriate, support them in accessing it.
- 3.4 If you are unsure whether your complaint falls under the scope of this policy, please contact the Trust's Governance Manager for clarification (see section 14 for contact details).

#### 4. Definitions

- 4.1 School refers to Evergreen School, Warwick.
- 4.2 Academy Trust or Trust is defined as the Warwick Schools Foundation Multi Academy Trust (MAT) that governs and oversees the operation of its academies.
- 4.3 *Pupil* or *student* is defined as a child or young person who is currently registered at the school.
- 4.4 A *parent* or *carer* is defined as a biological, adoptive parent, legal guardian or any other person with parental responsibility or care for a pupil currently attending the school.
- 4.5 A *complainant* refers to a person or organisation raising a concern or making a formal complaint. This may include parents, carers, members of the public or other stakeholders.
- 4.6 A *concern* is defined by the Department for Education as "an expression of worry or doubt over an issue considered to be important for which reassurances are sought'. The Policy treats a concerns as an issue which is not yet a formal complaint and may often be resolved without invoking the formal procedure outlined in this Policy.
- 4.7 A complaint is a formal expression of dissatisfaction about the standard or service, actions or lack of action by the Academy Trust, the school, or its staff. It is defined by the Department for Education as 'an expression or statement of dissatisfaction however made, about actions taken or a lack of action'.
- 4.8 Working days refers to full school days in term time. This therefore excludes all school holidays, weekends, public holidays and half-days. Correspondence and documentation received after 5PM on a working day will be deemed to have been received on the next working day.
- 4.9 *Headteacher/Head of School* is the most senior leader responsible for the day-to-day management of the school.
- 4.10 Chief Executive Officer (CEO) is the senior executive leader of the Academy Trust.

- 4.11 Local Governing Board (LGB) is the governance body responsible for overseeing the school.
- 4.12 *Trust Board or Trustees* are responsible for the strategic direction, oversight and ultimate accountability of the Academy Trust.
- 4.13 Where the words 'normally' or 'usually' are used, it is expected that the timescale would only be altered by the school or the parents in exceptional circumstances, such as the illness of a parent or a key member of staff involved in the process. Should the matter progress to an appeal, the availability of the any of the participants including the panel members may also be a constraint. In these circumstances, notification will be sent to complainants to inform them of the proposed length of time it will take to undertake initial enquiries above and beyond the normal time indicated.

#### 5. The Procedure

- 5.1 In order to assist in a speedy and satisfactory resolution, complainants are asked, from the beginning, to state clearly the exact nature of their concern and the remedy sought. It can greatly assist a speedy and satisfactory resolution if the notification is prompt and specific, including examples and factual evidence where this is appropriate and practicable.
- 5.2 A central record will be kept securely of informal complaints, allowing the pattern of concerns and complaints to be monitored regularly by appropriate members of the senior management team.
- 5.3 Timescales for each stage of complaint are outlined in the relevant paragraphs below. The school will make every effort to adhere to the timeframes set out at each stage of the complaints procedure. However, in certain cases, such as when a complaint involves complex issues or when key individuals are unavailable, meeting these deadlines may not be feasible. In such instances, the complainant will be informed as soon as possible and a revised timeframe will be outlined that is reasonable and acceptable to all parties involved.
- 5.4 The school expects all concerns and complaints to be raised as soon as possible after an issue arises. Prompt communication allows matters to be addressed efficiently and increases the likelihood of a satisfactory resolution for all parties involved.
- 5.5 To support this, the school operates a general expectation that complaints should be submitted within three months of the incident or issue occurring. Complaints received outside of this timeframe may not be considered, unless there are exceptional circumstances. These may include, for example, where new evidence has come to light, the matter is of a particularly serious nature, or where there is a valid reason why the complainant was unable to raise the issue sooner.
- 5.6 Decisions about whether to accept a late complaint will be made by the Headteacher, MAT Director or relevant senior leader, in consultation with the Chair of Governors or Trust leadership as appropriate. Their decision will take into account the circumstances, the nature of the complaint, and whether it is still possible to conduct a fair and thorough investigation.

# 6. Complaints relating to EYFS

6.1 The school takes all concerns and complaints relating to the delivery of the Early Years Foundation Stage (EYFS) requirements seriously. These include issues relating to the

- learning and development requirements, safeguarding and welfare requirements, or the qualifications and ratios of staff in early years settings.
- 6.2 Parents and carers of children in EYFS may raise complaints using this Policy in the first instance. Where a concern relates specifically to the EYFS statutory framework, the complaint will be investigated in accordance with this Policy and a written response will be provided within 28 days, as required under the EYFS framework.
- 6.3 In addition, any parent or carer may make a complaint to Ofsted if they believe that a school or early years provider is not meeting the EYFS requirements. Ofsted will consider whether the complaint raises issues of regulatory concern and may decide to carry out an inspection or take other appropriate action.

Complaints can be submitted to Ofsted via:

Website: https://www.gov.uk/government/organisations/ofsted

• Helpline: 0300 123 1231

• Email: enquiries@ofsted.gov.uk

6.4 Please note that while complainants can contact Ofsted at any time, it is usually expected that concerns will be raised with the school or Trust first, unless there are urgent regulatory or safeguarding issues.

## 7. Stage 1 Complaint – Informal Resolution

- 7.1 It is hoped that most complaints and concerns can be expressed and resolved quickly and on an informal basis.
- 7.2 If parents or guardians have a concern or complaint, they should raise them with the appropriate person at the school in the first instance (e.g. your child's class teacher), either in person or by letter, telephone or email. If he/she is not the appropriate person to deal with the complaint, he/she will pass it to the person who is. If this individual cannot resolve the matter alone, it may be necessary for him/her to consult the Deputy Head or the Headteacher or another member of the Senior Leadership Team. If the complainant is unclear who to contact or how to contact them, they should contact their school office.
- 7.3 The aim is to resolve the matter promptly to the parents' or guardians' satisfaction.
- 7.4 Complaints made directly to the Deputy Head or the Head are likely to be referred to the relevant member of staff unless the Deputy Head or the Head deems it appropriate to deal with the matter personally.
- 7.5 The school will usually acknowledge informal complaints within 5 working days and investigate and provide a response within 15 working days. The complainants may be invited into school to meet with the relevant member(s) of staff to discuss the issues and seek to find a resolution, by way of an informal mediation process.
- 7.6 Where an informal resolution is not achieved, parents may make a formal complaint under Stage 2 of this Policy within 15 working days from the date of the Stage 1 decision. If there is no further communication following the resolution of the Stage 1 complaint, the matter will be considered closed.

## 8. Stage 2 Complaint – Formal Complaint

- 8.1 If the complaint cannot be resolved on an informal basis at Stage 1 of the procedure, the parents or guardians should raise their complaint with the Headteacher in writing, by letter or email.
- 8.2 The complainant should provide details such as relevant dates, times, and the names of witnesses of events, alongside copies of any relevant documents, and what they feel would resolve the complaint.
- 8.3 The Headteacher will record the date the complaint is received and will acknowledge receipt of the complaint in writing within 5 working days of receipt.
- 8.4 The Headteacher (or other senior member of staff appointed by the Headteacher for this purpose) will then conduct their own investigation. The investigation will involve gathering and reviewing evidence from those involved in the complaint.
- 8.5 Following conclusion of the investigation and upon consideration of all available evidence, the options available to the Headteacher are:
  - Uphold the complaint and direct that certain action be taken to resolve it.
  - Reject the complaint, with explanation, and confirm that the complaint is now considered resolved, although complainants are still entitled to pursue a Stage 3 Complaint within the relevant timescales should they remain dissatisfied.
  - Uphold the complaint in part: in other words, the Headteacher may find one
    aspect of the complaint to be valid, but not another aspect. They may direct
    for certain action to be taken to resolve the aspect that they find in favour of
    the complainant.
  - Advise the complainant that the matter will be dealt with via an alternative statutory process.
- 8.6 The Headteacher must explain clearly why they have reached the decision that they have made, and detail any agreed actions which have arisen as a result of the complaint.
- 8.7 Written conclusion of the investigation will be sent to the complainant within 28 working days of receipt of the complaint.
- 8.8 If the complainant(s) remain dissatisfied with the decision, they may choose to invoke Stage 3 of this Procedure and must do so within 15 working days from the date of the Stage 2 decision. If there is no further communication following the resolution of Stage 2 complaint, the matter will be considered closed.

# 9. Stage 3 – Independent Reviewer

- 9.1 If the complainant is not satisfied with the outcome of the complaint at Stage 2 and wishes to appeal the decision made by the Headteacher (or other senior leader), they should inform the Trust's Governance Manager in writing within 15 working days of conclusion of the Stage 2 procedure. Requests received outside of this timeframe will be considered in exceptional circumstances.
- 9.2 Complaints should be submitted by letter or email to the Trust's Governance Manager using the contact details outlined at section 14.
- 9.3 Within the Stage 3 complaint, complainants must provide details of the complaint as set

- out at 8.2, as well as details from the complainant on how they feel the previous stage of the procedure has not addressed their complaint sufficiently, and what they feel would resolve the complaint.
- 9.4 Complainants should note that the complaint at this stage should not change in scope from that presented at Stage 1. Should any new matters be presented, complainants will usually be advised that they will be dealt with under Stage 1.
- 9.5 The Governance Manager will acknowledge in writing receipt of the complaint within 5 working days and will confirm that it is being treated as a Stage 3 Complaint.
- 9.6 An Independent Reviewer will then be appointed by or on behalf of the school/Trust. The Independent Reviewer cannot not have been, at any time, a Governor of the school, or a member of staff or supply staff at the school and must not have been a parent of a registered or formerly registered pupil at the school (the **Independent Reviewer**). They also must not have been directly involved in any matter detailed in the complaint.
- 9.7 The Independent Reviewer will convene a review meeting (the **Review Meeting**) with the complainant(s) and representatives from the school, as appropriate. This will be arranged by the Governance Manager and will usually be held within 28 working days of receipt of the Stage 3 complaint.
- 9.8 The complainants may be accompanied to the Review Meeting by one other person who will be present to provide support and not to participate in the discussions. This may be a relative, teacher or friend. Legal representation will not be appropriate. Parents must inform the Governance Manager if they will be accompanied, and by whom, at least 5 working days prior to the date of the Review Meeting.
- 9.9 During the Review Meeting, each party will have an opportunity to set out written or oral submissions prior to the meeting. Any written submissions or additional documentation must be sent to the Governance Manager at least 5 working days prior to the Review Meeting.
- 9.10 At the Review 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 independent reviewer, the complainant and the school representative(s) will be given the chance to ask and reply to questions.
- 9.11 After considering the available evidence, the options available to the Independent Reviewer are:
  - Uphold the complaint and direct that certain action be taken to resolve it.
  - Reject the complaint, with explanation, and confirm that the complaint is now considered resolved, although complainants are still entitled to pursue a Stage 3 Complaint should they remain dissatisfied.
  - Uphold the complaint in part: in other words, the Head may find one aspect
    of the complaint to be valid, but not another aspect. They may direct for
    certain action to be taken to resolve the aspect that they find in favour of the
    complainant.
  - Advise the complainant that the matter will be dealt with via an alternative statutory process.
- 9.12 The complainant, school/Trust and Headteacher where relevant, the subject of the complaint, will be given a copy of the findings and recommendations made by the Independent Reviewer.

9.13 The Independent Reviewer will confirm their decision in writing within 10 working days of the Review Meeting.

# 10. Complaint about the Headteacher

- 10.1 The procedure for dealing with an informal complaint about the Headteacher is set out below:
  - parents may choose to raise complaints directly with the Head if they feel that the matter is capable of resolution informally. The complaint may be raised orally or in writing. The School will not automatically treat the complaint as a formal (Stage 2) complaint will endeavour to resolve the complaint informally under Stage 1:
  - the Head will acknowledge informal complaints within 5 working days and will seek to resolve the matter under this Stage 1 by means of direct conversation or a meeting with the parents, to be held within 15 working days of receipt of the complaint;
  - if the parent is dissatisfied with the Head's response to the informal complaint or in the
    event that the complaint cannot be resolved by informal means, the parent may make
    a formal complaint under Stage 2 of this Policy within 15 working days from the date
    of the Stage 1 decision. If there is no further communication following the resolution
    of the Stage 1 complaint, the matter will be considered closed.
- 10.2 Alternatively, parents may choose to make their complaint about the Head directly to the Local Governing Body. In this case, the complainants should outline their complaint in writing for the attention of the Trust's Governance Manager (see section 14). The complaint will then be referred to the Chair of the school's Local Governing Body to determine the most appropriate person to investigate the complaint.
- 10.3 Complaints raised in this manner will be treated as a formal complaint under Stage 2 of this complaints procedure, with the same timescales applying. Following the investigation process and consideration of the evidence and recommendations, the Local Governing Body will make a determination on the complaint using the following options:
  - Uphold the complaint and direct that certain action be taken to resolve it.
  - Reject the complaint, with explanation, and confirm that the complaint is now considered resolved, although complainants are still entitled to pursue a Stage 3 Complaint should they remain dissatisfied.
  - Uphold the complaint in part: in other words, the LGB may find one aspect of the complaint to be valid, but not another aspect. They may direct for certain action to be taken to resolve the aspect that they find in favour of the complainant.
  - Advise the complainant that the matter will be dealt with via an alternative statutory process.
- 10.4 If the complainants remain dissatisfied with the decision, they may choose to invoke Stage 3 of this Procedure and must do so within 15 working days from the date of the Stage 2 decision. If there is no further communication following the resolution of Stage 2 complaint, the matter will be considered closed.
- 11. Complaint about the Trust's central team (CEO, CFO, MAT Director etc)
- 11.1 Where a complaint concerns a member of the Trust's central team, this should

be referred to the Trust's Governance Manager who will liaise with the CEO and/or Chair of Trustees to determine the most appropriate person to investigate the complaint.

- 11.2 Complainants should outline their complaint in writing for the attention of the Trust's Governance Manager (see section 14). Following the investigation process and consideration of the evidence and recommendations, a determination on the complaint will be made using the following options:
  - Uphold the complaint and direct that certain action be taken to resolve it.
  - Reject the complaint, with explanation, and confirm that the complaint is now considered resolved, although complainants are still entitled to pursue a Stage 3 Complaint should they remain dissatisfied.
  - Uphold the complaint in part: one aspect of the complaint to be valid, but not another aspect. It may be directed that a certain action be taken to resolve the aspect found in favour of the complainant.
  - Advise the complainant that the matter will be dealt with via an alternative statutory process.
- 11.3 Complaints of this nature will be treated as formal complaints under Stage 2 of this complaints procedure (as outlined in section 8), with the same timescales and procedures applying.

# 12. Referring Complaints on Completion of the School and Trust Procedures

- 12.1 If the complainant is unsatisfied with the outcome of the school/Trust's complaints procedure, they can refer their complaint to the Education and Skills Funding Agency (ESFA). The ESFA will check whether the complaint has been dealt with properly. The ESFA will not overturn a school's decision about a complaint, but will intervene if a school 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
- 12.2 The complainant can refer their complaint to the ESFA online at: www.education.gov.uk/contactus, by telephone on: 0370 000 2288 or by writing to:

Academy Complaints and Customer Insight Unit Education and Skills Funding Agency Cheylesmore House Quinton Road Coventry CV1 2WT

## 13. Record-keeping and Confidentiality

- 13.1 The school/Trust will record the progress of all formal complaints, including information about:
  - Actions taken at all stages
  - The stage at which the complaint was resolved
  - The final outcome

- 13.2 This material will be treated as confidential and stored securely and will be viewed only by those involved in investigating or administering the complaint or on the Complaints Panel, save for 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 the complainant makes a data request pursuant to the Data Protection Act 2018, or where the material must be made available during a school inspection.
- 13.3 Records of complaints will be kept securely, only for as long as necessary and in line with data protection law and the Trust's/school's privacy notices and data protection policies.

## 14. Complaint Contact Details

14.1 Stage 3 Complaints and any complaint queries should be directed to the Trust's Governance Manager:

By email: governance@wsfmat.co.uk

Alternatively, by post:

MAT Governance Manager Warwick Schools Independent Foundation Myton Road Warwick United Kingdom CV34 6PP

14.2 The Governance Manager acts as Clerk to the Trust Board and in the context of complaints, Clerk to the Local Governing Boards.

### **Appendix 1: Unreasonable and Persistent Complaints**

### 1. Unreasonable complaints

- 1.1. Most complaints raised will be valid, and therefore we will treat them seriously. However, a complaint may become unreasonable if the person:
  - Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
  - Refuses to co-operate with the complaints investigation process
  - Refuses to accept that certain issues are not within the scope of the complaints procedure
  - Insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice
  - Introduces trivial or irrelevant information which they expect to be taken into account and commented on
  - Raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales
  - Makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced
  - Changes the basis of the complaint as the investigation proceeds
  - Repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
  - Refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed, including referral to the ESFA
  - Seeks an unrealistic outcome
  - Makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
  - Uses threats to intimidate
  - Uses abusive, offensive or discriminatory language or violence
  - Knowingly provides falsified information
  - Publishes unacceptable information on social media or other public forums

The above list is not intended to be exhaustive and is for guidance purposes only. It is at the discretion of the school what is deemed to be unreasonable.

1.2.1 Complainants should try to limit their communication with the school while the complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text), as it could delay the outcome being reached.

# 2. Steps we will take

2.1. We will take every reasonable step to address the complainant's comments, 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.
- 2.2. Whenever possible, the Headteacher or Chair of Governors will discuss any concerns with the complainant informally before applying an 'unreasonable' marking. If the behaviour continues, the Headteacher will write to the complainant explaining that their behaviour is unreasonable, refer them to this policy and remind them to act in accordance with it. For complainants who excessively contact the school causing a significant level of disruption, 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
- 2.3 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 school premises and ensuring appropriate measures of support are provided to staff where they are the subject of aggression and/or violence.

### 3. Serial/persistent complaints

- 3.1. If the complainant contacts the school again on the same issue, the correspondence may then be viewed as 'serial' or 'persistent'. We may stop responding to the complainant when the following conditions are met:
  - We have taken every reasonable step to address the complainant's concerns
  - The complainant has been given a clear statement of our position and their options
  - The complainant contacts the school repeatedly, making substantially the same points each time
- 3.2 The case to stop responding is stronger if:
  - The complainant's communications are often or always abusive or aggressive
  - The complainant makes insulting personal comments about or threats towards staff
  - We have reason to believe the individual is contacting the school with the intention of causing disruption or inconvenience
- 3.3 Where we decide to stop responding, we will inform the individual that we intend to do so. We will also explain that we will consider any new complaints they make provided the concerns raised are materially different to those raised previously and/or are unconnected to the previous concern.

### 4. Duplicate complaints

- 4.1. If we have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, we will assess whether there are aspects that we hadn't previously considered, or any new information we need to take into account.
- 4.2. 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 that the local process is complete
- Direct them to the ESFA if they are dissatisfied with our original handling of the complaint
- 4.3 If a duplicate complaint is raised which in the view of the school warrants further consideration, the procedure outlined in section 6 or 7 (as appropriate) will be repeated.

### 5 Complaint campaigns

- 5.1 Where the school 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 website
  - Sending a template response to all of the complainants
- 5.2 If complainants are not satisfied with the school's response, or wish to pursue the complaint further, the normal procedures will apply.