Group Policy Document

Summary

This policy document is to detail the procedures for managing complaints across Eastern Multi-Academy Trust settings to ensure that we carry this out consistently. This policy is based on the Department for Education's model policy for managing complaints.

COMPLAINTS POLICY 2026-29

If you are unsure about the validity of the content of this policy please refer to the Policy Owner.

Please Note: This policy is applicable to All settings within the Trust.

Policy owner	**Board**
Policy holder	**Chief Executive Officer**
Author	**Paul Shanks CEO**
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Group Policy Area	EMAT core policy suite

Approved by

Consultation Group	**Board, Principals, ELT**
Approval Committee	**Board**
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Version Control

Control No	Change summary	Consultation Group	Effective date
01	Addition of EMAT specific elements	Board	May 2024
02	Addition of Persistent and Vexatious complaints	Board	May 2024
03	Addition of Concerns relating to SEND provision.	ELT	October 2025
04	Amended to comply with updated DfE Guidance. Inclusion of AI generated complaints and expectations. Remove reference to ESFA and replaced with DfE	Board	Oct 2026

Who can make a complaint?

The statutory complaints procedure primarily applies to parents and carers of registered pupils. The Trust may apply the same process to complaints from other individuals where appropriate.

The difference between a concern and a complaint

A concern may be defined as '*an expression of worry or doubt over an issue considered to be important for which reassurances are sought'*.

A complaint may be defined as '*an expression of dissatisfaction however made, about actions taken or a lack of action*'.

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

If you have difficulty discussing a concern with a particular member of staff, we will respect your views. In these cases, you should raise your concerns with the Principal of the academy. Similarly, if the member of staff directly involved feels unable to deal with a concern, they may refer you to another staff member. The member of staff may be more senior but does not have to be. The ability to consider the concern objectively and impartially is more important.

We understand however, that there are occasions when people would like to raise their concerns formally. In this case, EMAT will attempt to resolve the issue internally, through the stages outlined within this complaints procedure.

Concerns relating to SEND provision should be raised initially with the class teacher and/or the SENDCo. If the concern remains unresolved, parents should follow the stages set out in this Policy. If the complaint is about the content or delivery of an Education, Health and Care (EHC) Plan, the Local Authority is responsible for investigating. Further guidance is available in the SEND Information Report.

How to raise a concern or make a complaint

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

Complaints against academy staff (except the Principal) should be made in the first instance, to the Principal via the academy office***.*** Please mark them as Private and Confidential.

Complaints that involve or are about the Principal should be addressed to the Director of Education, via the academy office. Please mark them as Private and Confidential.

Complaints about the Chair of Governors, any individual governor or the whole Academy Committee should be addressed to the Trust's Lead Governance Professional (Deborah Hinks) via the academy office. Please mark them as Private and Confidential.

Complaints about the Chief Executive Officer (CEO) or a trustee of the Trust, should be addressed to the Chair of Trustees, via the trust office. Please mark them as Private and Confidential. Complaints about the Chair of the Trust should be addressed to the Vice Chair via the trust office in the same way.

For ease of use, a template complaint form is included at the end of this procedure. If you require help in completing the form, please contact your child's academy office. You can also ask a third-party organisation for example like the Citizens Advice to help you.

In accordance with equality law, we will consider making reasonable adjustments if required, to enable complainants to access and complete this complaints procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations.

Artificial Intelligence (AI) and Complaints

The Trust recognises that complainants, staff and representatives may use Artificial Intelligence (AI) tools, including generative AI platforms such as Microsoft Copilot, ChatGPT and Google Gemini, to assist in drafting correspondence, compiling evidence or preparing complaints. The use of AI is not prohibited; however, all parties remain responsible for the accuracy, authenticity and appropriateness of any information submitted.

In accordance with Department for Education (DfE) guidance, schools should seek to resolve concerns fairly, proportionately and as early as possible, maintaining open and constructive communication throughout the process. Complaints should be considered on the basis of evidence, facts and relevant policy requirements rather than the volume, style or format of submissions. The DfE's complaints guidance emphasises fairness, impartiality, timeliness and proportionality in complaint handling.

Submission of AI-Generated Complaints

Where a complaint has been wholly or partly generated using AI:

- The complaint will be processed in the same manner as any other complaint.
- The complainant remains responsible for ensuring that all statements, allegations and evidence submitted are accurate and truthful.
- The school may seek clarification where allegations are unclear, inconsistent, excessively lengthy, repetitive or unsupported by evidence.
- The submission of AI-generated text does not create an obligation on the school to respond to every individual assertion where multiple points repeat substantially the same concern.
- The school may request that complainants identify the key issues requiring investigation to support effective and timely resolution.

Expectations Regarding Accuracy and Evidence

Generative AI systems can produce inaccurate, misleading or fabricated information ("hallucinations"). The Trust therefore reserves the right to:

- Verify the authenticity of evidence provided.
- Disregard material that cannot be substantiated.
- Request original documents or supporting evidence where concerns arise regarding accuracy.
- Focus investigations on verifiable facts and evidence rather than AI-generated interpretations, opinions or summaries.

The DfE advises education settings to use AI cautiously and to recognise that AI-generated content should always be subject to human review and professional judgement.

Data Protection and Confidentiality

Individuals submitting complaints must not upload or enter personal, confidential or sensitive information relating to pupils, families, staff or third parties into public AI platforms unless they have a lawful basis to do so and are satisfied that data protection requirements are met.

The Trust will not require complainants to disclose whether AI has been used; however, where AI-generated material includes personal information about others, the Trust may consider whether that information has been processed lawfully and may take appropriate action if confidentiality or data protection obligations have been breached.

This reflects DfE guidance that personal and sensitive data should be protected and not entered into generative AI systems without appropriate safeguards.

School Use of AI

The Trust may use approved AI tools to support administrative aspects of complaint handling, including:

- Drafting correspondence;
- Summarising large volumes of documentation;
- Identifying duplicate or repeated issues;
- Supporting the preparation of reports.

Any use of AI by the Trust will be subject to appropriate human oversight. AI will not make decisions, determine outcomes, reach findings, or replace professional judgement. Final decisions at all stages of the complaints process will always be made by the relevant school leader, complaints investigator, panel member or trustee.

Managing Excessive or Repetitive AI-Generated Correspondence

The Trust recognises that AI tools can generate large volumes of correspondence quickly. Where submissions become excessive, repetitive or unreasonable, the Trust may:

- Require complaints to be consolidated into a single submission;
- Limit responses to new matters not previously addressed;
- Apply its Serial, Persistent or Unreasonable Complaints Procedure where appropriate.

Any such action will be proportionate and consistent with DfE guidance on managing serial and persistent complaints whilst ensuring that legitimate concerns continue to be addressed fairly.

Principle

The use of AI by either complainants or the Trust will not disadvantage or advantage any party. Complaints will be assessed on their merits, the available evidence, and the requirements of this policy. Human decision-making, professional judgement, natural justice and procedural fairness will remain central to the complaints process at all times.

Anonymous complaints

We will not normally investigate anonymous complaints. However, the Principal or Director of Education, if appropriate, will determine whether the complaint warrants an investigation.

Time scales

You must raise the complaint within **three months** of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

Complaints received outside of term time

We will consider complaints made outside of term time to have been received on the first academy day **after** the holiday period.

Scope of this complaints procedure

This procedure covers all complaints about any provision of community facilities or services by Eastern Multi Academy Trust other than complaints that are dealt with under other statutory procedures, including those listed below.

Exceptions	Who to contact
• Admissions to academies	Concerns about admissions should be handled through a separate process – either through the appeals process or via the local authority.
• Matters likely to require a Child Protection Investigation	Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance. If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH - Suffolk)/Children's Advice and Duty Desk (CADS - Norfolk). Norfolk LADO: 0344 800 8020 or LADO@norfolk.gov.uk Suffolk LADO: 0300 123 2044 or LADO@suffolk.gov.uk
• Exclusion of children from academy*	Further information about raising concerns about exclusions can be found at: www.gov.uk/academy-discipline-exclusions/exclusions. **complaints about the application of the behaviour policy can be made through this complaints procedure.*
• Whistleblowing	We have an internal whistleblowing procedure for all our employees, including temporary staff and contractors. The Secretary of State for Education is the prescribed person for matters relating to education for whistle-blowers in education who do not want to raise matters direct with their employer. Referrals can be made at: www.education.gov.uk/contactus. Volunteer staff who have concerns about our academy should complain through the academy's complaints procedure. You may also be able to complain direct to the LA or the Department for Education (see link above),

	depending on the substance of your complaint.
• Staff grievances	Complaints from staff will be dealt with under the academy's internal grievance procedures.
• Staff conduct	Complaints about staff will be dealt with under the academy's internal disciplinary procedures, if appropriate. Complainants will **not** be informed of any disciplinary action taken against a staff member as a result of a complaint. However, the complainant will be notified that the matter is being addressed.

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 procedure or result in the procedure being suspended until those public bodies have completed their investigations. If this happens, we will inform you of a proposed new timescale.

If a complainant commences legal action against EMAT in relation to their complaint, we will consider whether to suspend the complaints procedure until those legal proceedings have concluded.

Resolving complaints

At each stage in the procedure, Eastern Multi Academy Trust wants to resolve the complaint. If appropriate, we will acknowledge that the complaint is upheld in whole or in part. In addition, we may offer one or more of the following:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that we will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review academy policies in light of the complaint
- an apology.

Withdrawal of a complaint

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing.

Stage 1 – Informal complaints

It is to be hoped that most concerns can be expressed and resolved on an informal basis.

Concerns should be raised with either the class teacher, year head / subject head or Principal. Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis and it may also prevent them from considering complaints at Stage 3 of the procedure.

At the conclusion of their investigation, the appropriate person investigating the complaint will provide

an informal written response within 10 academy days of the date of receipt of the complaint.

If the issue remains unresolved, the next step is to make a formal complaint.

Stage 2 – Formal complaints

Formal complaints must be made to the Principal (unless they are about the Principal), via the academy office. This may be done in person or in writing (preferably on the Complaint Form).

The Principal will record the date the complaint is received and will acknowledge receipt of the complaint in writing (either by letter or email) within 5 academy days.

Within this response, the Principal will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the complainant would like to see. The Principal can consider whether a face to face meeting is the most appropriate way of doing this.

> ***Note: The Principal may delegate the investigation to another member of the academy's senior leadership team but not the decision to be taken.***

During the investigation, the Principal (or investigator) will:

- if necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish
- keep a written record of any meetings/interviews in relation to their investigation.

At the conclusion of their investigation, the Principal will provide a formal written response within 15 academy days of the date of receipt of the complaint.

If the Principal 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 Eastern Multi Academy Trust or the academy will take to resolve the complaint.

The Principal will advise the complainant of how to escalate their complaint should they remain dissatisfied with the outcome of Stage 2.

If the complaint is about the Principal, or a member of the Academy Committee (including the Chair or Vice-Chair), a suitably skilled person will be appointed to complete all the actions at Stage 2.

Complaints about the Principal must be made to the Director of Education, via the academy office. Complaints about governors should be addressed to the Lead Governance Professional.

If the complaint is:

- jointly about the Chair and Vice Chair or
- the entire Academy Committee or
- the majority of the Academy Committee

Stage 2 will be escalated to the CEO of the Trust.

Stage 3 – Panel Hearing

If the complainant is dissatisfied with the outcome at Stage 2 and wishes to take the matter further, they can escalate the complaint to Stage 3 – a panel hearing consisting of at least three people who were not directly involved in the matters detailed in the complaint with one panel member who is independent of the management and running of the academy. This is the final stage of the complaints procedure.

A request to escalate to Stage 3 must be made to the Governance Professional of the academy committee, via the academy office, within 5 academy days of receipt of the Stage 2 response.

The Governance Professional will record the date the complaint is received and acknowledge receipt of the complaint in writing (either by letter or email) within 3 academy days.

Requests received outside of this time frame will only be considered if exceptional circumstances apply.

The Governance Professional will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 15 academy days of receipt of the Stage 2 request. If this is not possible, the Governance Professional will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of **three proposed dates, without good reason**, the Governance Professional will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.

If the complaint is:

- jointly about the Chair and Vice Chair or
- the entire Academy Committee or
- the majority of the Academy Committee

Stage 3 will be heard by trustees.

A complainant may bring someone along to the panel meeting to provide support. This can be a relative or friend. Generally, we do not encourage either party to bring legal representatives to the panel meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a academy employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

*Note: Complaints about staff conduct will **not** generally be handled under this complaints procedure. Complainants will be advised that any staff conduct complaints will be considered under (Human Resources) staff disciplinary procedures, if appropriate, but outcomes **will not** be shared with them.*

Representatives from the media are not permitted to attend.

At least 10 academy days before the meeting, the Governance Professional will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible

- request copies of any further written material to be submitted to the panel at least 5 academy days before the meeting.

Any written material will be circulated to all parties at least 5 academy days before the date of the meeting. The panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The panel will also **not review any new complaints** at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the procedure.

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The panel will consider the complaint and all the evidence presented. The panel can:

- uphold the complaint in whole or in part
- dismiss the complaint in whole or in part.

If the complaint is upheld in whole or in part, the panel will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the academy's systems or procedures to prevent similar issues in the future.

The Chair of the panel will provide the complainant and Eastern Multi Academy Trust or academy with a full explanation of their decision and the reason(s) for it, in writing, within 5 academy days.

The letter to the complainant will include details of how to contact the Department for Education if they are dissatisfied with the way their complaint has been handled by Eastern Multi Academy Trust.

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 Eastern Multi Academy Trust will take to resolve the complaint.

The panel will ensure that those findings and recommendations are sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about. Furthermore, they will be available for inspection on the academy premises by the proprietor and the Principal.

A written record will be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing, along with what actions have been taken, regardless of the decision.

All correspondence statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

Complaints escalated to / about the Trust, CEO or Trustee

If a complaint is escalated to Eastern Multi Academy Trust "the trust" or if a complainant wishes to complain directly about the trust, then the complaint should be sent to the CEO to be investigated.

The CEO or their representative will write to the complainant acknowledging the complaint within **3 academy days** of the date that the written request was received. **Complaints about an academy should first of all be addressed to the academy Principal to try to resolve locally unless the complaint relates to the Principal themselves**. The acknowledgement will confirm that the complaint will now be investigated under Stage 2 of this Complaints Policy and will confirm the date for providing a response to the complainant.

Following the investigation, the CEO or their representative will write to the complainant confirming the outcome within **15 academy days** of the date that the letter was received. If this time limit cannot be met, the CEO or their representative will write to the Complainant within **10 academy days** of the date that the letter was received**,** explaining the reason for the delay and providing a revised date.

If the complaint concerns the CEO or a Trustee, the complaint should be investigated by the Chair of the Trust Board. If a formal complaint form is received about the Chair, the complaint will be referred to the Vice Chair for investigation

- *NB. Where the Chair of the Trust Board has investigated the complaint, they will write the letter of outcome to the Complainant and provide a copy to the CEO.*

If the complainant is not satisfied with the outcome of the previous stage, the complainant should write to the Lead Governance Professional asking for the complaint to be heard before a Complaint Panel, within 5 academy days.

The Governance Professional will record the date the complaint is received and acknowledge receipt of the complaint in writing (either by letter or email) within 3 academy days.

Requests received outside of this time frame will only be considered if exceptional circumstances apply.

The Governance Professional will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 15 academy days of receipt of the Stage 2 request. If this is not possible, the Governance Professional will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Governance Professional will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.

If the complaint is:

- jointly about the Chair and Vice Chair or
- the entire trust board or
- the majority of the trust board

Stage 3 will be heard by a completely independent panel

The Complaint Panel will consist of three members. None of the three members of the Complaint Panel will have been involved in the incidents or events which led to the complaint, or have been involved in dealing with the complaint in the previous stages, or have any detailed prior knowledge of the complaint.

One of the Complaint Panel members will be independent of the management and running of the Academy Trust. This means that the independent Complaint Panel member will not be a Trustee or an employee of the Trust.

A complainant may bring someone along to the panel meeting to provide support. This can be a relative or friend. Generally, we do not encourage either party to bring legal representatives to the panel meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a trust employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

Note: Complaints about staff conduct will not generally be handled under this complaints procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 10 academy days before the meeting, the Governance Professional will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the panel at least 5 academy days before the meeting.

Any written material will be circulated to all parties at least 5 academy days before the date of the meeting. The panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The panel will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the procedure.

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The panel will consider the complaint and all the evidence presented. The panel can:

- uphold the complaint in whole or in part
- dismiss the complaint in whole or in part.

If the complaint is upheld in whole or in part, the panel will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the academy's systems or procedures to prevent similar issues in the future.

The Chair of the panel will provide the complainant and Eastern Multi Academy Trust with a full explanation of their decision and the reason(s) for it, in writing, within 10 academy days.

The letter to the complainant will include details of how to contact the Department for Education if they are dissatisfied with the way their complaint has been handled by Eastern Multi Academy Trust.

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 Eastern Multi Academy Trust will take to resolve the complaint.

The panel will ensure that those findings and recommendations are sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about. Furthermore, they will be available for inspection on the academy premises by the proprietor and the Principal.

A written record will be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing, along with what actions have been taken, regardless of the decision.

All correspondence statements and records relating to individual complaints will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

Investigating Officers

Investigating Officers will be appointed by the senior member of staff who receives the complaint. It may be appropriate that the person receiving the complaint investigates it, for example a Principal or the Director of Education.

The Investigating Officer will be independent of the complaint, ie – they are not involved or the subject of the complaint. Independent does not necessarily mean someone external to the trust, although in some instances it may be appropriate to appoint an external Investigating Officer, for example from the Trust's legal representatives or auditors. This decision will be determined by the circumstances of the complaint and taken by the CEO/Director of People in consultation with the IO. No person involved in investigating or hearing a complaint will have had prior involvement in the matter complained of.

Reasonable Adjustments

Eastern Multi Academy Trust will make all reasonable adjustments to allow a complainant or staff member to engage with the complaints process. This could include the use of technology or through allowing responses in writing rather than interview. The adjustments made will depend on the needs of the individual and should be discussed with the IO or Governance Professional prior to any investigation meeting or hearing.

Persistent or vexatious Complaints

Unreasonably persistent or vexatious complaints

Many complaints raised will be valid, and therefore we will treat them seriously as they are an opportunity for us all to learn and improve. However, a complaint may become unreasonable if the person:

- Has made the same complaint before, and it's already been resolved by following the academy's complaints procedure
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive
- Knowingly provides false information 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, refuses 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
- Changes the basis of the complaint as the investigation goes on
- Makes a complaint designed to cause disruption, annoyance or excessive demands on academy or Trust time
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value 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.

If the complainant continues to contact the academy or Trust 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
- 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 their options
- 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, violence or harassment (including via email), we will immediately inform the police and communicate our actions in writing. This may include barring an individual from our academy sites.

The Trust reserves the right to refer unreasonably persistent complaints to its legal representatives and further action taken.

Duplicate complaints

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.

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.

Complaint campaigns

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

- Publishing a single response on the academy website
- Sending a template response to all of the complainants

If complainants are not satisfied with the academy's response, or wish to pursue the complaint further, the normal procedures will apply.

Social Media Complaints

Complaints should be raised through this procedure and not through social media channels. Any complaint raised via social media will not usually be considered.

Confidentiality

Publication of confidential information regarding a complaint may result in the Trust limiting future engagement where lawful to do so.

Next Steps

If a complainant believes the academy or trust has not handled their complaint in accordance with its published complaints procedure, or has acted unlawfully or unreasonably, they may refer the matter to the Department for Education.

The DfE will not normally reinvestigate the substance of complaints or overturn any decisions made by Eastern Multi Academy Trust. They will consider whether EMAT or one of its academies has adhered to education legislation and any statutory policies connected with the complaint and whether they have followed Part 7 of the Education (Independent Academy Standards) Regulations 2014.

The complainant can refer their complaint to the DfE online at: www.education.gov.uk/contactus or by telephone on: 0370 000 2288.

Complaint Form

Please complete and return to the Principal of the academy or Chief Executive of the Trust who will acknowledge receipt and explain what action will be taken.

Your name:
Pupil's name (if relevant):
Your relationship to the pupil (if relevant):
Address: **Postcode:** **Day time telephone number:** **Evening telephone number:** **Email address:**
Please give details of your complaint, including whether you have spoken to anybody at the academy about it.

What actions do you feel might resolve the problem at this stage?
Are you attaching any paperwork? If so, please give details.
Signature: **Date:**
Official use
Date acknowledgement sent:
By who:
Complaint referred to:
Action taken:
Date:

Roles and Responsibilities

Complainant

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

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

Investigator

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

- providing a comprehensive, open, transparent and fair consideration of the complaint through:
  - sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved
  - interviewing staff and children/young people and other people relevant to the complaint
  - consideration of records and other relevant information
  - analysing information
- liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right.

The investigator should:

- conduct interviews with an open mind and be prepared to persist in the questioning
- keep notes of interviews or arrange for an independent note taker to record minutes of the meeting
- ensure that any papers produced during the investigation are kept securely pending any appeal
- be mindful of the timescales to respond
- prepare a comprehensive report for the Principal or complaints panel that sets out the facts, identifies solutions and recommends courses of action to resolve problems.
- The Principal or complaints panel will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details.

Complaints Co-ordinator

(this could be the Principal or CEO / designated complaints governor or trustee or other staff member providing administrative support)

The complaints co-ordinator should:

- ensure that the complainant is fully updated at each stage of the procedure

- liaise with staff members, Principal, CEO, Chair of Governors, Chair of Trust or the Governance Professional and to ensure the smooth running of the complaints procedure
- be aware of issues regarding:
    - sharing third party information
    - additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person
- Complaint records will be retained in accordance with the Trust's Records Management and Data Retention Policy

Governance Professional to the Academy Committee / Trust Board

The Governance Professional is the contact point for the complainant and the panel and should:

- ensure that all people involved in the complaint procedure are aware of their legal rights and duties, including any under legislation relating to academy complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR)
- set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible
- Ensure that arrangements are made for the evidence packs relevant to the complaint ((for example: stage 1 paperwork, academy and complainant submissions) are forwarded to all parties ahead of the meeting and not usually any later than 5 working days before.
- record the proceedings
- circulate the minutes of the meeting
- notify all parties of the panel's decision.

Panel Chair

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

- both parties are asked (via the Governance Professional) to provide any additional information relating to the complaint by a specified date in advance of the meeting
- the meeting is conducted in an informal manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy
- complainants who may not be used to speaking at such a meeting are put at ease. This is particularly important if the complainant is a child/young person
- the remit of the panel is explained to the complainant
- written material is seen by everyone in attendance, provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR.

  If a new issue arises it would be useful to give everyone the opportunity to consider and comment upon it; this may require a short adjournment of the meeting
- both the complainant and the academy are given the opportunity to make their case and seek clarity, either through written submissions ahead of the meeting or verbally in the meeting itself

- the issues are addressed
- key findings of fact are made
- the panel is open-minded and acts independently
- no member of the panel has an external interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- the meeting is minuted
- they liaise with the Governance Professional (and complaints co-ordinator, if the academy has one).

Panel Member

Panel members should be aware that:

- the meeting must be independent and impartial, and should be seen to be so

  No governor / trustee may sit on the panel if they have had a prior involvement in the complaint or in the circumstances surrounding it.

- the aim of the meeting should be to resolve the complaint and achieve reconciliation between the academy and the complainant

  We recognise that the complainant might not be satisfied with the outcome if the meeting does not find in their favour. It may only be possible to establish the facts and make recommendations.

- many complainants will feel nervous and inhibited in a formal setting

  Parents/carers often feel emotional when discussing an issue that affects their child.

- extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting

  Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated.

  The panel should respect the views of the child/young person and give them equal consideration to those of adults.

  If the child/young person is the complainant, the panel should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the panel should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend.

  However, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the panel considers is not in the child/young person's best interests. The welfare of the child/young person is paramount.