



KIMICHI SCHOOL COMPLAINTS POLICY

Policy Owner: Headteacher / Designated Safeguarding Lead (DSL)

Approved By: Governing Body

Date Approved: April 2026

Review Date: August 2026

1. Principles

a) Kimichi School values positive relationships with parents and aims to maintain open, respectful, and transparent communication. We are committed to providing high-quality education and pastoral care.

b) Where concerns arise, we seek to resolve them promptly, fairly and proportionately. All complaints will be handled in accordance with this procedure and in line with statutory requirements.

c) Where a conflict of interest arises, the member of staff must declare this immediately and take no further part in the investigation or decision-making process.

d) A conflict of interest may include (but is not limited to):

- Personal relationships (e.g. family members, including a child at the school)
- Close personal or professional relationships
- Prior involvement in the matter being complained about

e) In such circumstances, responsibility for the complaint will be reassigned as follows:

- If the complaint would normally be handled by the Headteacher, it will be referred to the Executive Headteacher or Chair of Governors
- If the complaint involves the Executive Headteacher, it will be referred directly to the Chair of Governors (Stage 3)
- The Chair of Governors may appoint an independent investigating officer where appropriate

f) The school will ensure that complaints are handled in a way that is impartial, transparent, and free from bias.

- g) The phrase “school days” refers to days during term time .
- i) It is not reasonable or practical for a complaint investigation to take place outside of the normal working terms of the school.

- h) The school will process all personal data relating to complaints in accordance with the UK GDPR and Data Protection Act 2018. This includes ensuring that information is:
 - i) Collected lawfully and only where necessary
 - ii) Shared on a strict need-to-know basis
 - iii) Stored securely
 - (iv) Retained only for as long as necessary

2. Timescales for Raising Complaints

- a) Complaints must be raised within three (3) months of the incident.
- b) Complaints outside this timeframe may be considered at the discretion of the Executive Headteacher/Headteacher (EHT/HT), where there is good reason.
- c) This decision is final

3. Scheme of Delegation

- a) A scheme of delegation exists to provide clarity where Stage 1 (4) has not been successful and where a conflict of interest has not been declared (1d);e);f)):
- b) If the issue/complaint is about:
 - i) Volunteers
 - ii) Visiting Music Teachers
 - iii) Guest Teachers
 - iv) Teaching Staff
 - v) Heads of Subject
 - vi) Heads of Year
 - vii) The Deputy Head/SENDCo
- c) The complaint must be made in writing to the **Headteacher**
- d) If the issue/complaint is about the Headteacher
 - i) The complaint must be made in writing to the **Executive Headteacher (Stage 3)**
- e) If the issue/complaint is about the Executive Headteacher
 - i) The complaint must be made in writing to the **Chair of Governors**: straight to Stage 3 (6)

4. Stage 1 – Informal Resolution

- b) Parents should initially raise concerns with the relevant member of staff (e.g. class teacher or subject teacher).
- c) The EHT/HT should be made aware of complaints as soon as reasonably practicable.
- d) Most concerns will be resolved at this stage through discussion and clarification.
- e) A brief written record of the concern and outcome will be kept securely in accordance with the school's data protection procedures and will only be accessible to relevant staff on a need-to-know basis.
- f) Resolution should normally be sought within 5 school days.

5. Stage 2 – Formal Complaint (Headteacher)

- a) If the matter is not resolved informally, parents should submit a formal complaint in writing to the EHT/HT, clearly stating that it is a formal complaint.
- b) The EHT/HT will acknowledge receipt within 2 school days.
- c) The EHT/HT will investigate the complaint, which may include:
 - o Meeting with parents
 - o Speaking to relevant staff
 - o Reviewing documentation
- d) A written outcome will be provided, including:
 - o Findings
 - o Decision
 - o Reasons for the decision
- e) A full response will normally be provided within 10 school days. If additional time is required, parents will be informed.

f) All information gathered during the investigation will be handled in accordance with data protection requirements. Where information relates to third parties, appropriate steps will be taken to ensure confidentiality, including redaction where necessary.

6. Stage 3 – Review by Chair of Governors

- a) If parents remain dissatisfied, they may escalate the complaint in writing to the Chair of Governors.
- b) The Chair will review:
 - o The process followed

- o The decision reached

c) The Chair may:

- o Uphold the decision
- o Request further investigation
- o Offer a meeting with parents

d) Respond within 15 school days

e) If the complaint is deemed to be a conflict of interest or without the scope of the expertise of the Chair, then they may defer to the Chair of Trustees or other outside independent voice to conduct a review, investigation or report of the complaint.

f) This will be a sub-Stage 3 investigation.

g) The investigatory powers given to the reviewing person(s) replicate those available at Stage 4. This describes their powers of investigation only; it does not constitute, or take the place of, the Stage 4 Complaints Panel Hearing provided for at clause 7.

h) There will be a time limit of 60 calendar days from the official reassignment of the complaint for this sub-stage to be completed and reported on.

i) If reasonable circumstances arise that necessitate an extension of 6(h) then this will be at the sole discretion of the investigating person through communication with the complainant.

j) A sub-Stage 3 investigation concludes the school's investigation of the complaint and is the final investigatory stage carried out on the school's behalf. It is not, however, the final stage of the school's internal complaints procedure. Where the complainant remains dissatisfied with the outcome of the sub-Stage 3 investigation, they may proceed to a Stage 4 Complaints Panel Hearing under clause 7 by requesting one in writing within 10 school days of the sub-Stage 3 outcome. The decision of the Stage 4 panel concludes the school's internal complaints procedure and is final within those procedures.

k) Should the response from Stage 3 receive no reply from the complainant within 15 school days, the matter will be considered closed.

Complaints concerning a permanent exclusion. A parent who wishes to challenge a permanent exclusion may bring the matter under this Complaints Policy. Such complaints proceed through the stages set out above, including, where unresolved, the Stage 4 Complaints Panel (three people not directly involved, at least one independent of the running and management of the school). This should be read alongside the Exclusion and Suspension Policy section *"Reconsideration and Rescission of a Permanent Exclusion."*

7. Stage 4 – Complaints Panel Hearing

a) If the complaint remains unresolved — including following a sub-Stage 3 investigation under clause 6 — parents may request a hearing before a Complaints Panel. Where the request follows a sub-Stage 3 investigation, it should be made in writing within 10 school days of the sub-Stage 3 outcome.

b) Panel Composition:

- Three individuals not directly involved in the complaint, including any person who conducted a sub-Stage 3 investigation of it
- At least one panel member who is independent of the management and running of the school (as required by the Education (Independent School Standards) Regulations 2019)

c) Procedure:

- The school will acknowledge the request and arrange a hearing within 10 school days
- Parents may attend and be accompanied by one other person (not normally legal representation)
- Relevant documentation will be shared in advance. This will be limited to information necessary for the panel to consider the complaint and may be redacted to protect personal data. All panel members are required to maintain strict confidentiality in line with data protection obligations.

d) Outcome:

- The Panel will:
 - o Consider all evidence
 - o Reach a decision
 - o Make recommendations where appropriate
- A copy of the panel's written findings and recommendations, with reasons, will be issued within 7 school days to the complainant and, where relevant, to the person complained about, and will be available for inspection on the school premises by the proprietor and the head teacher.

e) This decision is final within the school's internal procedures.

8. Record Keeping and Confidentiality

a) A written record will be kept of:

- All complaints (formal and informal)
- Whether they are resolved at each stage
- Outcomes and actions taken

b) All records will be processed in accordance with the UK GDPR and Data Protection Act 2018. This includes ensuring that:

- Data is processed lawfully, fairly and transparently
- Only information necessary for the complaint is collected and retained
- Access is restricted to those involved in handling the complaint
- Records are stored securely (electronically or physically)

c) Complaints and their records retained in line with the school's data retention schedule (typically a minimum of 6 years for complaints), unless a longer retention period is required due to safeguarding, legal or regulatory considerations

d) Individuals have the right to request access to personal data held about them. Where such requests are made (e.g. Subject Access Requests), the school will respond in accordance with data protection legislation. Information relating to third parties may be redacted where appropriate.

e) Records will remain confidential except where disclosure is required:

- By law
- To relevant inspection bodies (e.g. Ofsted or ISI) upon request, in accordance with the Education (Independent School Standards) Regulations 2019
- Under safeguarding obligations

e) A central complaints register will be maintained by the school. This will record all formal complaints, their stage, outcomes, and actions taken. Complaint records will be held separately from individual pupil files unless safeguarding considerations require otherwise.

9. Managing Serial, Persistent or Vexatious Complaints

a) Where a complainant's behaviour is deemed unreasonable, excessively repetitive, abusive, threatening, or vexatious, the school reserves the right to manage communications proportionately. This may include:

- Limiting communication to a single point of contact
- Restricting methods of communication
- Acknowledging correspondence without providing a substantive response
- Declining to respond to matters already fully addressed
- Concluding communication where appropriate

b) Any such decision will be made reasonably, proportionately, and with regard to the circumstances of the complaint."

c) The decision to apply these measures will normally be taken by the Headteacher, Executive Headteacher, Chair of Governors, or Chair of Trustees.

10. Monitoring and Review

a) The school will monitor complaints to identify patterns or systemic issues and will use this information to inform school improvement.

b) Where complaints are reviewed for monitoring purposes, data will be anonymised to protect the identities of individuals.

11. Policy Review

This policy agreed on (date): 29/06/2026

By

(name) K. Henderson-Jones

(position) Chair of Trustees, Kimichi Worcester

Review date 29/08/2026