



Complaints Policy

2026/2027

Policy issue and updates

<i>Pages</i>	<i>Issue No.</i>	<i>Date</i>
Whole document – new	1	July 2025
Whole document – annual review	2	August 2026

The following policy has been approved by the Divisional CEO and Governing Board of Directors.

The policy will be reviewed on a biennial basis unless circumstances arise requiring the policy to be reviewed earlier.

Approved by Executive Team: August 2026

Board signatory: 

Planned review: August 2028

Policy intent

This policy is written as an operational document for schools. It should be used consistently, recorded accurately and applied in a way that is fair, accessible, proportionate and inspection-ready.

1. Policy overview

- 1.1 Progress Arc is committed to dealing with concerns and complaints fairly, openly, proportionately and without unnecessary delay. We recognise that concerns are often best resolved early through discussion, explanation and practical action.
- 1.2 The majority of issues raised by parents, carers, students, members of the public, employers, commissioners or professionals are concerns rather than formal complaints. Staff should take concerns seriously at the earliest opportunity and should seek to resolve them before formal procedures are required.
- 1.3 Where a concern cannot be resolved informally, or where the complainant wishes to make a formal complaint, this policy sets out the staged procedure that will be followed.
- 1.4 Formal complaints will be dealt with in a sensitive, impartial and confidential manner. A complainant will not be disadvantaged because they have raised a genuine concern or complaint.
- 1.5 Whether a complaint is upheld, partially upheld or not upheld, investigation reports and outcome letters should identify learning, recommendations or actions where appropriate. These will be monitored to completion and used to inform school improvement, staff training and organisational learning.

2. Legal and regulatory framework

- 2.1 This policy is written with reference to the Education (Independent School Standards) Regulations 2014, including Part 7 of the Schedule, which requires a written complaints procedure for handling complaints from parents of pupils.
- 2.2 The policy also takes account of the Department for Education independent school standards guidance, Keeping Children Safe in Education, Working Together to Safeguard Children, the Equality Act 2010, the SEND Code of Practice, the Data Protection Act 2018 and UK GDPR.
- 2.3 Progress Arc will review this policy whenever legislation, statutory guidance, regulatory expectations or organisational arrangements change.

3. Definitions

Term	Meaning
Concern	An expression of worry or doubt over an issue considered important, for which reassurance, explanation or informal resolution is sought.
Complaint	An expression of dissatisfaction, however made, about actions taken, a lack of action, provision, communication, conduct or decision-making.
Complainant	The person making the complaint. This may include a parent, carer, student, professional, commissioner, employer, neighbour or member of the public.
Working day	A school working day during term time. School holiday periods are not normally included unless the matter is urgent, safeguarding-related or otherwise requires immediate action.
Panel	A complaints panel convened at the final stage of the procedure, including at least one person independent of the management and running of Progress Arc.

4. Scope of the policy

- 4.1 This policy applies to complaints relating to Progress Arc, including education, behaviour, attendance, communication, pastoral support, equality, health and safety, school procedures, facilities and leadership decisions.
- 4.2 The policy may be used by students, parents, carers, employers, placing authorities, professionals, visitors, neighbours and members of the public.
- 4.3 Where a matter relates to a suspension or permanent exclusion, the relevant suspension or exclusion letter will set out the specific appeal route. This complaints policy does not replace statutory or policy-based appeal arrangements.
- 4.4 Where a complaint raises safeguarding concerns, allegations against staff, child protection concerns, whistleblowing matters, data protection rights, employment matters or legal proceedings, those processes may take precedence. The complainant will be informed where a different or additional process applies.

5. Principles of complaint handling

- Concerns will be taken seriously and addressed at the earliest appropriate stage.
- The process will be accessible, clear and explained to complainants.
- Complaints will be handled respectfully, confidentially, impartially and proportionately.
- Investigations will be evidence-based and will consider information from all relevant parties.
- Complainants will be kept informed of timescales and any unavoidable delay.
- No person investigating or deciding a complaint should have been directly involved in the matter being complained about, wherever this is practicable.
- Outcomes will identify findings, reasons, actions and recommendations where appropriate.
- Themes, trends and learning will be reviewed by senior leaders to improve practice.

6. Equality, diversity and accessibility

- 6.1 Progress Arc will make reasonable adjustments to support access to this policy and participation in the complaints process. This may include advocacy, interpreter support, translation, alternative formats, additional time, simplified explanations, visual supports or support from an appropriate adult.
- 6.2 Students with SEND will be supported to express views in a way that is meaningful to them. Staff should avoid assuming that a student cannot make a complaint because of communication, cognition, anxiety or behaviour needs.
- 6.3 Complaints involving potential discrimination, harassment, victimisation or failure to make reasonable adjustments must be handled carefully and recorded clearly. The investigator should consider whether any equality-related action is required as part of the outcome.

7. Time limits

- 7.1 To enable Progress Arc to investigate effectively, complaints should normally be made within six months of the incident occurring or within six months of the matter coming to the complainant's attention.
- 7.2 Complaints outside this timeframe will not normally be investigated. However, Progress Arc may consider an older complaint where there are exceptional circumstances,

safeguarding concerns, significant health and safety concerns, or where it is otherwise reasonable and practicable to investigate.

- 7.3 Requests to escalate a complaint to the next stage should normally be made within ten working days of receiving the outcome from the previous stage. Late escalation requests may be considered where there is a reasonable explanation.

8. Anonymous complaints

- 8.1 Anonymous complaints will not normally be investigated under this policy. However, Progress Arc may investigate or take action where the information raises safeguarding concerns, criminal matters, health and safety risks, allegations of serious misconduct or another significant public interest issue.
- 8.2 Anonymous information must still be passed to the appropriate senior leader where it suggests risk to a child, staff member or the wider school community.

9. Stage 1 - Informal concern

- 9.1 Concerns may be raised verbally, by email, by telephone, in person or through another agreed communication method. Parents and carers are encouraged to make first contact with a member of staff or the Headteacher.
- 9.2 Staff should seek to resolve concerns promptly and respectfully, usually through explanation, clarification, practical action or a follow-up conversation. Many concerns will be resolved the same day or within a day or two.
- 9.3 Where the concern requires further checking, discussion with others or a short fact-finding exercise, the complainant should be updated and provided with an informed response, normally within five working days.
- 9.4 Any staff member dealing with a concern must ensure that the Headteacher is aware, even where the matter is resolved informally. Concerns resolved at Stage 1 must still be logged on the Concern/Complaints tracker.
- 9.5 Where the concern is about the Headteacher, the complainant should make every effort to raise and resolve this with them directly. If this has been unsuccessful, they should be directed to the Progress Education Wider Leadership Team. Contact details

for relevant senior colleagues should be available via the school or Progress Arc website.

10. Stage 2 - Formal complaint heard by the Headteacher

- 10.1 If the complainant is not satisfied following Stage 1, or the matter is too serious to be managed informally, the complainant may make a formal complaint. To be accepted, formal complaints should refer to a specific incident(s), action(s) or decision(s) and provide relevant details. They are to be made in writing, addressed to the Headteacher or Leadership Team at the school address. Support should be provided where a complainant requires help to put the complaint in writing.
- 10.2 The complaint will be logged, including the relevant information. Receipt will normally be acknowledged within two working days.
- 10.3 The Headteacher will normally investigate the complaint. Where the complaint relates to the Headteacher, a member of the Progress Education Wider Leadership Team or another appropriate senior leader will arrange the investigation.
- 10.4 A meeting may be offered where this would help clarify the complaint, understand what remains unresolved and identify the outcome sought. The meeting will normally take place within ten working days where practicable.
- 10.5 A written outcome will normally be provided within ten working days of acknowledgement, unless the complexity of the matter requires more time. Where additional time is required, the complainant will be informed of the reason for delay and the revised timescale.
- 10.6 If the complainant remains dissatisfied, they should explain why and request escalation within ten working days of receiving the Stage 2 response.

11. Stage 3 - Wider Leadership Team review

- 11.1 Where the matter has not been resolved at Stage 2, the complaint may be reviewed by a member of the Progress Education Wider Leadership Team. The WLT member may investigate the matter themselves or appoint an appropriate internal or external investigator where this is more suitable.

- 11.2 The Stage 3 will review whether the Stage 2 investigation was fair, whether relevant evidence was considered, whether conclusions were reasonable, and whether further action is required.
- 11.3 The WLT member or appointed investigator will normally provide a written response within ten working days. Where this is not possible, the complainant will be informed of the revised timescale.
- 11.4 If the complainant remains dissatisfied, they should request escalation to Stage 4 within ten working days and explain what remains unresolved.

12. Stage 4 - Director review and complaints panel

- 12.1 If the matter remains unresolved following Stage 3, the complaint may be referred to the Progress Education Director Team. The complainant should set out why they remain dissatisfied and what outcome they are seeking.
- 12.2 The Director may conduct a final review where the matter can reasonably be resolved without a panel. Where the complaint cannot be resolved by a Director alone, or where a panel is required, a complaints panel hearing will be convened.
- 12.3 The Stage 4 review will normally take place within ten working days of receiving the written escalation request. Where further investigation is required, the complainant will be informed of the revised timescale.

13. Complaints panel

- 13.1 When a complaints panel needs to be convened, the hearing will normally take place within ten working days of receiving the Stage 5 escalation request. Where this is not possible due to availability, school holidays, complexity or the need to secure an independent panel member, the complainant will be informed of the revised timescale.
- 13.2 The aim of the panel hearing is to consider the complaint impartially, review the evidence, seek resolution where possible and identify findings and recommendations.
- 13.3 All parties will be notified of the panel decision in writing, normally within three working days of the panel hearing. The outcome letter will explain the panel's findings, recommendations and any further route available once the internal procedure is complete.

14. Complaints panel arrangements

- 14.1 Where it is necessary to convene a panel hearing, the panel will consist of at least three people who were not directly involved in the matters detailed in the complaint.
- 14.2 At least one panel member will be independent of the management and running of Progress Arc. This means they must not be involved in the day-to-day management or running of Progress Arc and must be able to consider the matter impartially.
- 14.3 Other panel members will be appointed by or on behalf of the Divisional CEO and may include a Director or appropriately senior colleague who has not been directly involved in the complaint.
- 14.4 The complainant may attend the panel hearing if they wish and may be accompanied by another person for support. This may include a family member, friend, advocate, interpreter, local authority representative or other appropriate supporter. Legal representation will not normally be necessary, but requests will be considered on a case-by-case basis.
- 14.5 The panel may invite relevant staff, leaders or witnesses to attend or provide written information. Information shared with the panel will be handled confidentially and only shared where necessary for a fair process.
- 14.6 The panel will make findings and recommendations. These will be provided to the complainant and, where relevant, to the person complained about. Records of the panel findings and recommendations will be made available for inspection by the proprietor, Headteacher and relevant inspection bodies as required.

15. Written records, confidentiality and data protection

- 15.1 A written record will be kept of all formal complaints, including whether they were resolved following a formal procedure or proceeded to a panel hearing, and the action taken by the school as a result of the complaint, regardless of whether the complaint was upheld.
- 15.2 Records should include the complaint reference, school, date received, complainant, student if relevant, category, stage, investigator, summary, evidence considered, outcome, recommendations, actions, review date and closure date.

- 15.3 Correspondence, statements, investigation records and panel records will be kept confidential except where disclosure is required by law, regulatory expectation, safeguarding need, inspection, proprietor oversight or another legitimate reason.
- 15.4 Records will be stored securely in accordance with the Data Protection Policy, Data Protection Act 2018 and UK GDPR. Complaint information should only be shared on a need-to-know basis.

16. Safeguarding complaints and allegations against staff

- 16.1 Safeguarding concerns override this policy. Where a complaint raises a safeguarding concern, child protection matter, allegation against a member of staff, low-level concern, risk of harm or concern about unsafe practice, it must be managed in accordance with the Safeguarding and Child Protection Policy and relevant Local Authority Designated Officer procedures.
- 16.2 Any complaint received about a member of staff in relation to safeguarding must be passed immediately to the relevant senior leader, Directors, Designated Safeguarding Lead or National Designated Safeguarding Lead as appropriate.
- 16.3 The Headteacher and relevant senior leaders must liaise with the Local Authority Designated Officer where required. The People Team will be informed where appropriate and any subsequent employment process will follow organisational policy once safeguarding processes allow this.
- 16.4 The safety and wellbeing of the child will be the paramount consideration throughout. The complaints process must not delay safeguarding referrals, protective action or statutory agency involvement.

17. Complaints about staff, senior leaders and Directors

- 17.1 General complaints about staff conduct will be managed by the relevant line manager in consultation with the People Team where appropriate. The process may link to capability, disciplinary, grievance or other People policies where required.
- 17.2 Complaints concerning the Headteacher will be managed by a member of the Wider Leadership Team or another appropriately senior colleague. The Headteacher will be informed of the complaint where appropriate, subject to safeguarding, confidentiality and investigation considerations.
- 17.3 Complaints concerning a Director will be managed by the Divisional Chief Executive Officer. An independent investigator may be appointed where appropriate.
- 17.4 Where a complaint includes both service issues and staff conduct issues, Progress Arc may separate the issues so that the complainant receives a response to the service complaint while employment matters remain confidential.

18. Student complaints and advocacy

- 18.1 Students may raise concerns or complaints directly, through a parent or carer, through an advocate, or through a trusted adult. Staff must listen carefully and record the student's voice as accurately as possible.
- 18.2 Students must be offered appropriate support to understand the process and express what happened, who was involved, what they would like to happen and whether they need an advocate.
- 18.3 Where a student complaint raises safeguarding, bullying, discrimination, mental health, restraint, behaviour management or attendance concerns, the relevant policies and safeguarding procedures must be considered alongside this policy.

19. Serial, persistent or unreasonable complaints

- 19.1 Progress Arc will always seek to resolve complaints fairly. However, some behaviour may make it difficult to progress a complaint, place unreasonable demands on staff or negatively affect the school community.

- 19.2 Behaviour may be considered unreasonable where it includes aggressive, abusive or threatening communication; excessive or repetitive contact; refusal to engage with the process; repeated pursuit of substantially the same issue without significant new evidence; or publication of defamatory or harmful material.
- 19.3 Progress Arc may take proportionate action, such as clarifying expectations, issuing a written warning, setting a communication plan, limiting contact to one channel or named contact, declining to respond to repeated points already answered, or escalating concerns to the placing authority, legal advisers or safeguarding authorities where required.
- 19.4 Progress Arc reserves the right to cease responding where the complainant has exhausted all stages of the procedure and continues to pursue substantially the same complaint without presenting significant new evidence. Any decision to restrict communication will be proportionate, recorded and reviewed.

20. Complaints relating to exams and qualifications

- 20.1 If anyone wishes to raise a complaint that is linked to examinations and/or qualifications, they must go through the full Progress School's complaints policy before escalating to the Awarding Organisation.
- 20.1 If the Progress Arc' complaints policy has been exhausted and a student is still not satisfied with the outcome, they can follow the Awarding Bodies complaints process. Details of these complaints processes can be found on the Awarding Bodies' website.

21. Monitoring, reporting and governance

- 21.1 Every informal concern or formal complaint will be recorded on the concerns/complaints tracker.
- 21.2 Complaint themes, patterns, outcomes and recommendations will be reviewed by the Headteacher and senior leaders. Themes will inform school improvement plans, staff training, leadership oversight and governance reporting.
- 21.3 Where complaints relate to health and safety, safeguarding, equality, SEND, attendance, behaviour or quality of education, the relevant lead must be informed so that action is tracked and learning is embedded.

21.4 The number of complaints registered under the formal procedure (stages 2-4) during the preceding school year will be made available in line with regulatory requirements.

22. Completion of procedure and external escalation

- 22.1 The internal Progress Arc complaints procedure is complete once the Stage 4 outcome has been issued, or where the Director confirms that the procedure has been exhausted.
- 22.2 Following completion of the Progress Arc complaints procedure, complainants may contact the Department for Education if they believe the school has failed to comply with the Independent School Standards or has failed to follow its published complaints procedure.
- 22.3 External bodies will not normally reinvestigate the substance of a complaint or overturn school decisions. Their role is generally to consider whether the school has complied with relevant legislation, regulatory requirements and its own published procedure.

Appendix A - Parent/carer complaint form

This form may be used to support a parent or carer to make a formal complaint. Staff should support completion where reasonable adjustments are required.

School	
Date of complaint	
Name of complainant	
Student name (if relates to a student)	
Contact details	
Preferred method of contact	
Details of complaint	
What has already been tried?	
What outcome are you seeking?	
Reasonable adjustments / advocacy required	
Signature	
Date	

Appendix B - Student complaint form: My Thinking Tool

This form should be adapted to the student's communication needs. Students may draw, write, talk, use symbols or ask an adult to record their views.

My name	
School	
Date	
What do you want to tell us?	
Who else was involved?	
When did it happen?	
Where did it happen?	
How did it make you feel?	
What could make things better?	
Would you like an advocate or trusted adult?	
My signature / mark	
Staff name and signature	