

The Guild Hall School

Complaints Policy

2026 – 2028



**THE GUILDHALL
SCHOOL**

Reference:	GHS Complaints V001 July26
Reviewed by:	Sariena Watkins
Review Date:	16.07.2026
Date of next review:	September 2028



Curiosity – Courage - Community

We believe in providing trauma-informed, therapeutic care. Where children and young people feel safe, valued and understood. We nurture Trust, emotional growth and resilience compassionate, consistent and relationship-led support.

C = *Curiosity and a bias for action fuel our innovation.*

A = *Accountability to those we serve help us deliver results.*

R = *Respect and Integrity are demonstrated in our actions.*

E = *Engaged and passionate employees define our company.*

Legal Status:

This Complaints Procedure is required by paragraph 33 of Part 7 of the Independent School Standards (ISS).

In accordance with ISS Part 6 – Provision of Information, this Complaints Procedure is published on the school website and available in hard copy upon request.

The number of complaints registered under the formal procedure during the preceding school year will also be published on the school website.

The Proprietor reviews all complaints annually to identify patterns, ensure compliance, and improve practice

Complaints Lead and contact details

The school's Complaints Lead is Sariena Watkins (Headteacher). Complaints may be submitted to the Complaints Lead by email at sariena.watkins@bayleafcare.co.uk, by post to 120 The Guild Hall School, Station Street, Burton-on-Trent, Staffordshire, DE14 1BX, or by telephone on 07759387959. The Complaints Lead is responsible for overseeing the complaints process, ensuring timescales are met and that complainants receive regular updates.

Purpose and Aims:

- To ensure complaints are handled fairly, transparently and confidentially.
- To provide a structured process for addressing concerns from parents, pupils or the public.
- To resolve complaints informally wherever possible.
- To outline the steps to be taken if a complaint cannot be resolved informally.
- To support positive relationships between school, families and community.
- To ensure compliance with ISS, Equality Act 2010, UK GDPR and KCSIE 2026.

Accessibility & Reasonable Adjustments

The Guild Hall School is committed to ensuring all complainants can access the complaints procedure. In line with the Equality Act 2010, reasonable adjustments will be made for:

- SEND-related communication needs
- Literacy or language barriers
- Trauma-related needs
- Requests for symbol-supported, verbal or assisted communication

The school will support complainants to express their concerns in a format that works for them.



How we make the procedure accessible

The school will make reasonable adjustments to support complainants with communication or access needs. This includes: providing information in Widgit symbol format, large print, audio or translated versions; offering a face-to-face meeting with an advocate or support worker; accepting complaints by telephone or recorded message where writing is a barrier; and allowing a nominated third party to act on behalf of the complainant with written consent. Requests for adjustments should be made to the Complaints Lead who will arrange support within 5 school days.

The Difference between a Concern and a Complaint

A **concern** is an expression of worry or doubt where reassurance is sought. A **complaint** is an expression of dissatisfaction about actions taken or lack of action.

The school aims to resolve concerns at the earliest possible stage.

Who can make a complaint

Any person, including members of the general public, may make a complaint about any provision of facilities or services provided, unless separate statutory procedures apply (such as suspensions or admissions). The Complaints Policy does not apply to prospective pupils who have no right of complaint.

SEND-Related Complaints

Complaints relating to SEND provision, EHCP implementation, reasonable adjustments or specialist support will be handled in line with this policy.

Where appropriate, the school will liaise with:

- Local Authority SEND team
- EHCP caseworkers
- Therapists
- Educational Psychologists
- Social care

SEND-related complaints may also be treated as safeguarding concerns if they relate to unmet needs or risk of harm.

Safeguarding-Related Complaints

Complaints relating to safeguarding or allegations against staff will be managed in accordance with KCSIE 2026 and the school's Safeguarding Policy.

Safeguarding complaints cannot be resolved informally and will always be escalated to the DSL.

Where a complaint includes an allegation against staff, the school will follow Part 4 of KCSIE, including referral to the LADO.

Allegations against staff and LADO

Where a complaint includes an allegation that a member of staff has harmed a pupil or behaved in a way that indicates they may pose a risk to children, the school will follow KCSIE Part 4 and the Safeguarding Policy. The DSL will notify the Local Authority Designated Officer (LADO) without delay and follow LADO guidance. Where appropriate, the school will also follow the Whistleblowing Policy and consider suspension pending investigation in line with HR procedures.



Complaints from parents and carers

The procedures set out below only relate to complaints from parents/carers of pupils, i.e. persons for whom education is being provided at the school. The process set out below does not cover complaints from parents of pupils who have left (except in cases where the complaints process was started when the pupil was still being educated at the school).

1. Informal Complaint (Stage 1)

If parents or carers have a complaint, they may initially wish to contact the school informally either by telephone, in writing or personally after making an appointment. The school will ask the complainant what they think might resolve the issue. The school will consider and resolve as quickly, and efficiently as possible the complaint and will respond with the outcome within 10 days, (where further investigations are necessary that will exceed this time period, new time limits will be communicated with an explanation for the delay). Complaints received out of term-time will be considered to be received on the next school day. For example, a complaint made during the school summer holidays will be considered to be received on the first day of the autumn term. If a complainant has difficulty making a complaint in writing, the school will take reasonable steps to support the complainant in making their complaint. The school will accept complaints made by third parties on behalf of parents. The school may, however, ask for evidence that the third party has consent to act on behalf of the parent (and to be privy to any information discussed during the complaints procedure and any personal data that may be disclosed in the response).

Interim updates and extensions

If an investigation cannot be completed within the published timescale, the school will notify the complainant in writing, explain the reason for the delay and provide a revised timescale. Complainants will receive interim updates at least every 10 school days while the investigation continues. Extensions will be used only where necessary and recorded in the complaint file.

2. Formal Complaint (Stage 2)

If parents or carers are not satisfied with the response at Stage 1, they should write formally to the Headteacher. The Headteacher will investigate the complaint further and respond in writing within 10 days (where further investigations are necessary that will exceed this time period, new time limits will be communicated with an explanation for the delay). If the complaint is against the Headteacher, the complaint should be addressed to the Director of Education. The Director of Education will investigate and respond within 20 days. Complaints received out of term-time will be considered to be received on the next school day. For example, a complaint made during the school summer holidays will be considered to be received on the first day of the autumn term. If a complainant has difficulty making a complaint in writing, the school will take reasonable steps to support the complainant in making their complaint. The school will accept complaints made by third parties on behalf of parents. The school may, however, ask for evidence that the third party has consent to act on behalf of the parent (and to be privy to any information discussed during the complaints procedure and any personal data that may be disclosed in the response).

Interim updates and extensions

If an investigation cannot be completed within the published timescale, the school will notify the complainant in writing, explain the reason for the delay and provide a revised timescale. Complainants will receive interim updates at least every 10 school days while the investigation continues. Extensions will be used only where necessary and recorded in the complaint file.



3. Formal Complaint (Stage 3)

If the parents or carers are still not satisfied with the response at Stage 2, they should inform the Director of Education, who will arrange a panel to hear the complaint. We will not normally accept a request for escalation to stage 3 if it is made more than one month after the stage 2 response is sent unless there is a genuine reason, for example, the complainant was unwell. The panel will comprise three people not directly involved in the matters detailed in the complaint. In addition, the members should be independent of the day-to-day running of the school. The date of the panel meeting will take into account the availability of the parents or carers as well as the school and will take place within 30 days. Complaints received out of term-time will be considered to be received on the next school day. For example, a complaint made during the school summer holidays will be considered to be received on the first day of the autumn term. If a complainant has difficulty making a complaint in writing, the school will take reasonable steps to support the complainant in making their complaint. Parents or carers will be invited to bring with them another person or persons to support them at the panel hearing if they wish (The panel hearing does not confer a right on a parent to have a legal representative to make representations on their behalf at the hearing).

The independent panel will hear the complaint and will hear the outcome of the school's investigations and its response to these. The panel will then make findings and recommendations which will be communicated in writing within 10 days of the conclusion of the hearing to the Proprietor, Education Director and the Headteacher and the parent or carer. If a parent does not exercise the right to attend a panel hearing, the panel will meet in line with this policy. The school's arrangements for the panel hearing will be reasonable in order to facilitate the parent(s) exercising the right of attendance.

A written record of all complaints and their resolution, whether they proceeded to a panel hearing or not, will be kept on the school premises by the Headteacher (Equality Act 2010) and made available to the Proprietor and Ofsted inspectors on request. The school will record the progress of the complaint and the final outcome. These records and any correspondence relating to a complaint will remain confidential, except where the Secretary of State or a body conducting an inspection under section 163 of the Education Act 2002 requests access to the records. The number of complaints registered under the formal procedure during the preceding school year will be published on the school website.

Panel composition and independence

The complaints panel will consist of three people who were not directly involved in the matters detailed in the complaint. At least one panel member will be independent of the day-to-day management of the school. The panel chair will be independent of the school's operational leadership. Any panel member with a potential conflict of interest must declare it in writing and will be replaced. The panel may call witnesses and request documents; legal representation is not normally permitted for parents, but the panel may seek legal advice if required.

Complaints About the Proprietor

If a complaint concerns the Proprietor, it should be sent directly to the Director of Education, who will appoint an independent panel to consider the complaint.

Record Keeping & Data Protection

Complaint records are retained securely for a **minimum of six years** and processed in accordance with **UK GDPR** and the **Data Protection Act 2018**.

Records remain confidential except where disclosure is required by the Secretary of State or an inspector under section 163 of the Education Act 2002.

Data protection, lawful basis and third-party access



Complaint records are processed under the school's lawful bases for processing personal data (legal obligation and legitimate interests). Records include correspondence, investigation notes and outcomes. Access to complaint records is restricted to the Complaints Lead, DSL/SLT where safeguarding is involved, the Proprietor and those with a legitimate need. Third parties acting on behalf of a complainant must provide written consent to receive personal data. Records will be anonymised before publication and shared with external bodies only where required by law or inspection.

Publication of complaints data

The school will publish the number of complaints registered under the formal procedure in the preceding school year on the website. Published data will be anonymised and presented as totals by category (e.g., safeguarding, SEND, admissions) to protect confidentiality.

Summary of Timescales		
Stage	Timescale	Notes
Stage 1 – Informal	10 school days	Extensions communicated
Stage 2 – Formal	10 school days	20 days if complaint is against Headteacher
Stage 3 – Panel	Panel within 30 school days	Outcome within 10 days

Complaints from pupils

The procedures below will be followed in the event of a pupil making a complaint against a member of staff, a fellow pupil or any other person or situation either in school or outside. Pupils may wish to talk to an adult they trust about a situation relating to school or to a situation outside school. Pupils are reminded that, although they may speak to any member of staff, there may be occasions where information will have to be referred to the Designated Safeguarding Lead and potentially other agencies, such as the Local Authority Children's Services.

Within school, pupils may talk to any member of Education Staff. A pupil may merely need a trusted adult to talk a situation through with and may not be making a formal complaint. However, all actual complaints made by pupils will be recorded by the member of staff in the Complaints Log. The school response to the complaint will also be recorded. If the complaint is serious the pupil's parents/carers will be informed of both the complaint and the outcome. Some complaints will be referred to other agencies or to the Local Authority. If necessary, a meeting will be called to discuss the issues further. A pupil may ask to speak to an adult from an outside agency. The school will, wherever possible, put the pupil in contact with a representative of the appropriate agency. The referral will be noted in the pupil's file. If the complaint is an allegation against a member of staff then the school's safeguarding policy must be followed in addition to recording the complaint.

Pupil complaints and support (Worry Box)

Pupils may raise concerns with any trusted adult in school. Where a pupil wishes to make a formal complaint, staff will support them to do so in an accessible format (Widgit, visual story, one-to-one meeting). The school will ensure a pupil making a complaint has access to an appropriate adult or advocate and will consider whether parents/carers should be informed, taking the pupil's wishes and best interests into account.

Anonymous concerns and complaints

This policy and procedure only apply in respect of concerns and complaints raised by parents/carers and key stakeholders. We will not, therefore, respond to concerns or complaints raised anonymously unless these are of a safeguarding nature. We will not, therefore, respond to concerns or complaints raised anonymously unless these are of a safeguarding nature. We will, however, consider the issues raised and take action where appropriate.



Community complaints

Any known community member making a complaint will receive communication from the school to ascertain the severity of the complaint. We will then assess the nature of the complaint and determine whether any further action needs to be taken.

Repeated complaints

If we have responded to a complaint and we receive a duplicate complaint from someone else, we will assess it to determine whether there are aspects that we had not previously considered. If we are satisfied that there are no new aspects (and we are assured that the complaints process has been followed fully through to a conclusion at Stage 3) we will inform the complainant and direct them to the Local Authority or the Department for education if they are dissatisfied with our response to the original complaint. If there are new aspects, we will follow this policy and procedure again.

Unreasonable complaints

The school is committed to dealing with all complaints fairly and impartially, and to providing a high-quality service. We will not normally limit the contact complainants have with the school. However, if a complainant displays unreasonable or unreasonably persistent behaviour, we may need to take action to limit contact in the interests of maintaining the effectiveness of this policy and procedure and to ensure the safety and wellbeing of our colleagues.

Examples of unreasonable and unreasonably persistent behaviour include, but are not limited to:

- Being abusive or making threats of any kind;
- Being physically or verbally intimidating or offensive;
- Refusal to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;
- Those who, because of the frequency or nature of their contacts with the school, hinder our consideration of their or other people's complaints'.

Final Compliance Statement

This Complaints Policy complies with:

- Independent School Standards (ISS) Part 7
- ISS Part 6 – Provision of Information
- Equality Act 2010
- Children & Families Act 2014 (SEND)
- KCSIE 2026
- DfE 2024–2026 Complaints Guidance
- Ofsted Independent School Handbook

All required information is published on the school website and available in hard copy upon request.