

## **BHS Complaints Policy and Procedure**

### **1. Document control**

**School:** Beaufort House School

**Applies to:** parents and carers of current and former pupils, and to staff responsible for handling concerns and complaints

**Proprietor / Headteacher:** Luke Steele

**Policy owner:** Proprietor / Headteacher

**Linked documents:** Governance and Leadership Policy; Safeguarding and Child Protection Policy; Low Level Concerns / Allegations Against Staff Policy; Admissions Policy; Behaviour Policy; Anti Bullying Policy; SEND Policy; Accessibility Plan; Information for Parents pack; complaints forms pack; complaints log; panel member records

**Review cycle:** annual, and sooner following any significant complaint, panel hearing, inspection finding, or material legal / regulatory change

### **2. Purpose**

This policy sets out how Beaufort House School will receive, consider and resolve parental concerns and complaints fairly, promptly and in a way that meets the independent school standards.

BHS will operate a three-stage complaints process:

- **Stage 1:** informal concern;
- **Stage 2:** formal complaint to the School;
- **Stage 3:** panel hearing.

### **3. Scope**

This policy applies to complaints from parents or carers of:

- current pupils;
- former pupils, if the complaint arose while the pupil was still registered.

It covers complaints about the School's provision, decisions, actions or omissions.

It does **not** replace or override:

- safeguarding referrals;
- allegations against staff or the proprietor;
- whistleblowing routes;
- staff grievances or disciplinary matters;
- routine contractual debt recovery or fee enforcement processes.

Where a matter falls partly under this policy and partly under another procedure, the School will identify the correct route for each part and explain that to the complainant.

#### 4. Core principles

BHS will handle complaints on the following principles:

1. concerns should be resolved as early as reasonably possible;
2. complaints should be handled fairly, calmly and without defensiveness;
3. the School will distinguish between a concern, a formal complaint and a safeguarding allegation;
4. timescales matter and should be met unless there is a good reason not to;
5. the complainant should know what stage has been reached and what happens next;
6. records must be accurate, controlled and reviewable;
7. the panel stage must be genuinely independent and not a rubber stamp.

#### 5. Availability of the procedure

This policy will be made available to parents of pupils and prospective parents on request and through the School's parent information set.

#### 6. Who may raise a complaint

A complaint may normally be raised by:

- a parent;

- a person with parental responsibility;
- a person who has care of the child and a sufficient interest in the matter.

Where a complaint is raised by someone else, the School may ask for clarification of standing before proceeding.

### 7. What is a concern and what is a complaint

A concern is an expression of worry, dissatisfaction or unease that may be resolved quickly and informally.

A formal complaint is a written expression of dissatisfaction requiring formal investigation and response under Stage 2 or Stage 3 of this policy.

The School will not force every concern into a formal complaint immediately. Equally, repeated unresolved concerns should not be left drifting informally.

### 8. Time limits

A complaint should normally be raised as soon as reasonably possible and, in any event, within 3 months of the event or decision complained of, or within 3 months of the complainant becoming aware of it.

The School may accept a later complaint where there is a good reason for the delay and where it remains fair and practical to investigate.

This is a School control decision designed to keep the process workable and fair.

### 9. Stage 1: Informal concern

Parents are encouraged to raise concerns first with the most appropriate member of staff, usually:

- the relevant guide or teacher;
- the relevant operational lead;
- or the headteacher where the issue is more serious or clearly beyond classroom level.

The aim at Stage 1 is to resolve the matter quickly, proportionately and without unnecessary formality.

*Stage 1 timescale*

- the School will normally acknowledge the concern within **2 school days**;
- the School will normally aim to respond or meet within **5 school days**;
- where the matter cannot be resolved quickly, the School will explain that and may move the parent to Stage 2.

A Stage 1 concern may be handled by phone, meeting or email, but a brief internal note should still be kept if the issue is substantive.

#### 10. Stage 2: Formal complaint

If the concern is not resolved informally, or if the matter is sufficiently serious, the parent may make a formal complaint in writing to the Headteacher.

If the complaint is about the Headteacher and proprietor, it must be sent for handling under the School's proprietor complaint route and must not be investigated personally by Luke Steele.

A formal complaint should set out:

- the issue complained of;
- the relevant facts;
- what has already been done;
- what outcome the parent is seeking.

The School may ask for clarification if the complaint is too unclear to investigate properly.

#### *Acknowledgment*

The School will normally acknowledge a Stage 2 complaint within **3 school days**.

#### *Investigation*

The School will:

- identify the investigator;
- review the documents;

- meet or speak with relevant people where needed;
- keep a record of the investigation;
- decide whether the complaint is upheld, partly upheld or not upheld.

### *Stage 2 response time*

The School will normally issue a written Stage 2 outcome within 10 school days of acknowledgment.

Where that is not reasonably possible, the School will write to the complainant explaining:

- the reason for the delay;
- the revised timescale.

### 11. Complaints about the proprietor / headteacher

Where the complaint concerns the proprietor / headteacher:

- it must not be investigated solely by him;
- it must be routed into the School's independent complaints handling structure;
- the School must ensure that the complainant still has access to Stage 3 if dissatisfied.

If the complaint also raises safeguarding concerns about the proprietor, the safeguarding / allegations route takes priority for that aspect.

### 12. Stage 2 outcome letter

The written Stage 2 response will normally include:

- the complaint summary;
- the investigation steps taken;
- the decision;
- the reasons for the decision;
- any action the School will take;

- whether the complainant may request a Stage 3 panel hearing and how to do so.

The letter should be clear, restrained and fact based.

### 13. Stage 3: Panel hearing

If the complainant remains dissatisfied after Stage 2, they may request a panel hearing.

The request must normally be made in writing within 10 school days of the Stage 2 outcome letter.

The School will then arrange a panel hearing within 20 school days of receiving the request, unless there is a good reason why that is not reasonably possible.

### 14. Constitution of the panel

The panel will normally consist of three people.

At least one panel member will be independent of the management and running of the School.

For BHS, the safer operating standard is:

- three panel members;
- at least one independent member;
- no one with prior direct involvement in the matter under complaint;
- no panel made up solely of persons under Luke Steele's immediate operational control.

### 15. Attendance at the panel hearing

The complainant may attend the hearing and may be accompanied if they wish.

The School may also be represented.

The hearing may proceed on the papers if:

- the complainant chooses not to attend; or
- attendance is not reasonably possible and the panel decides it can still consider the case fairly.

### 16. Conduct of the hearing

The chair of the panel will ensure that:

- the process is fair and orderly;
- each side has a reasonable opportunity to present its case;
- questioning remains relevant and respectful;
- the panel considers the complaint afresh rather than merely endorsing the Stage 2 response.

### 17. Panel decision

After the hearing, the panel will decide whether the complaint is:

- upheld;
- partly upheld;
- not upheld.

The panel may also recommend actions.

The panel's written findings and recommendations will be sent to:

- the complainant;
- the person complained about, where relevant;
- the proprietor;
- and, where applicable, the headteacher.

### *Timescale*

The panel decision will normally be issued within 5 school days of the hearing.

### 18. Record keeping

The School will keep a written record of:

- all formal complaints;

- whether they were resolved at Stage 2 or proceeded to a panel hearing;
- and any action taken by the School as a result.

The School will also keep:

- the complaint form or complaint email;
- acknowledgment;
- investigation notes;
- correspondence;
- outcome letters;
- panel papers;
- panel decision record;
- action follow up record.

Records will be kept confidential except where disclosure is required in the course of the School's inspection or under another lawful process.

Part 7 also requires that correspondence, statements and records relating to individual complaints are kept confidential except where the Secretary of State, a body conducting an inspection under section 109 of the 2008 Act, or the panel chair requires access.

#### 19. Complaints log and pattern review

BHS will maintain a central complaints log.

Leadership will review:

- repeated themes;
- whether timeframes are being met;
- whether particular policies or staff areas are generating repeated dissatisfaction;

- whether any complaint reveals a safeguarding, SEND, behaviour, medical or communication weakness;
- whether any action promised has actually been completed.

A complaints procedure is not effective if the School never learns from it.

## 20. Complaints involving safeguarding, SEND or discrimination

Where a complaint includes:

- a safeguarding concern;
- an allegation against a member of staff;
- disability discrimination issues;
- serious SEND provision concerns;
- or another matter requiring a specialist route,

the School will:

- identify that overlap clearly;
- route the matter under the relevant policy where necessary;
- explain to the complainant how the processes relate.

The complaints procedure does not replace legal or safeguarding escalation routes.

## 21. Persistent, serial or unreasonable complaint behaviour

BHS may take proportionate steps where a complainant's behaviour becomes unreasonable, for example through:

- repeated duplication of points already answered;
- aggressive, abusive or threatening communication;
- excessive volume of contact that makes fair handling difficult.

Any such response must be:

- proportionate;
- recorded;
- approved by leadership;
- and must not prevent a legitimate complaint from being heard.

The School will focus on conduct management, not retaliation.

## 22. Publication and availability

This policy will be:

- made available to parents of pupils and prospective parents on request;
- included in the School's information for parents set;
- kept current and controlled under the master document register.

## 23. Monitoring and review

The proprietor / headteacher will review:

- whether the procedure remains compliant with Part 7;
- whether panel independence is genuinely secured;
- whether timescales are being met;
- whether records are complete;
- whether patterns in complaints reveal wider weaknesses.

This policy will be reviewed annually and sooner if:

- a panel hearing exposes a weakness;
- a complaint involves the proprietor and reveals process risk;
- inspection identifies concern;
- the legal or regulatory position changes.

#### 24. Linked annexes / live documents that should exist

This policy depends on the following controlled documents existing and being kept current:

- Complaints Form
- Complaints Acknowledgment Template
- Stage 2 Investigation Record
- Stage 2 Outcome Letter Template
- Stage 3 Panel Request Form / template
- Panel Hearing Agenda
- Panel Decision Record Template
- Central Complaints Log
- Complaints Action Tracking Sheet
- Panel Member Independence Declaration
- Proprietor complaint handling note
- Unreasonable complainant management note