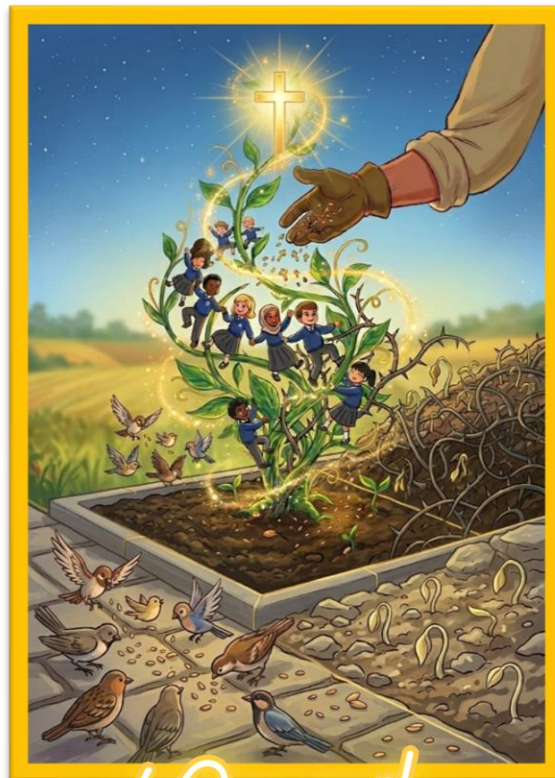




St. Peter's
Church of England Primary School

COMPLAINTS POLICY



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'In Jesus, we learn, love and grow together'

Procedures for the Handling of Complaints Policy

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St Peter's Church of England Primary School

Procedures for the Handling of Complaints Policy

Introduction and scope

St Peter's Church of England Primary School works in partnership with parents and the wider community. We will consider concerns and complaints fairly, impartially and with respect for everyone involved. This procedure covers complaints about the school, its staff, its governing body and the facilities or services it provides, except matters with separate statutory or employment procedures.

Anyone is entitled to raise a complaint, including parents, carers, former pupils and members of the public. We will seek an early informal resolution. A complainant choosing a formal response will have access to the formal stage and the appeals stage under The Complaints Procedures below, without needing permission from the headteacher or chair of governors.

Anonymous complaints will not normally be investigated through this procedure. The headteacher, or chair where the complaint concerns the headteacher, will assess whether the information warrants investigation or another referral. Safeguarding concerns will receive attention regardless of whether the person reporting them gives their name. This policy is available on the school website and from the school office.

What is a concern or complaint?

a) A concern or complaint is defined as an expression of dissatisfaction about the conduct/operation of the School, the conduct of, actions or lack of actions by a member of staff/the Governing Body/an individual governor, unacceptable delay in dealing with a matter or the unreasonable treatment of a pupil or other person.

b) The following matters use separate procedures. The school will explain the relevant route to the person raising the concern.

- ✚ Child protection concerns and allegations against adults working with children: the school's safeguarding procedures and Rochdale safeguarding arrangements.
- ✚ Freedom of information and data protection matters: the relevant information rights procedures, with escalation to the Information Commissioner's Office where appropriate.
- ✚ Complaints about Rochdale Borough Council's own functions or services: the council's complaints procedure.
- ✚ Suspensions and permanent exclusions: the statutory review and appeal arrangements. Complaints about the school's application of its behaviour policy remain within this complaints procedure.
- ✚ School admission decisions: the admission authority's published arrangements and statutory appeal process.
- ✚ Services provided independently by another organisation using school premises or facilities: the provider's own complaints procedure. Safeguarding concerns will still follow the school's safeguarding arrangements.
- ✚ Staff grievances and disciplinary matters: the school's employment procedures.
- ✚ Statutory special educational needs assessments and Education, Health and Care plan decisions: Rochdale Borough Council's statutory processes and the SEND Tribunal where applicable. Complaints about the school's SEND support remain within this complaints procedure.
- ✚ Whistleblowing by staff: the school's whistleblowing procedure and the appropriate external reporting route.

c) Allegations of child abuse, assault, criminal activity or financial irregularity will follow the relevant safeguarding, police, financial or employment procedures. Urgent referrals will not wait for the ordinary complaints timescales. The Serious allegations or complaints section explains these arrangements.

Making a complaint - who to complain to:

If the complaint is about:

- ✚ something that has happened or failed to happen in School, contact the Headteacher;
- ✚ the actions of the headteacher, contact the Chair of Governors through the school office. If the Chair has a conflict of interest, contact the Clerk to Governors.
- ✚ the actions of an individual governor, contact the Clerk to Governors through the school office.
- ✚ the Chair of Governors, contact the Clerk to Governors through the school office.
- ✚ the actions of the whole governing body, or both the Chair and Vice Chair, contact the Clerk to Governors through the school office.

The school will normally seek an informal resolution first. Complainants choosing a formal response or seeking an appeal will have access to the next stage without needing the school's permission. Correspondence addressed to the Chair or Clerk will be forwarded confidentially to the relevant recipient. The school office will provide contact details on request.

The school will acknowledge a complaint or appeal request within five school days and aims to complete each stage within 20 school days. School days means days when the school is open to pupils. If more time is needed, the person handling the complaint will explain the reason, give a revised response date and keep the complainant informed. Requests outside a stated escalation deadline will receive individual consideration, including any exceptional circumstances and communication or disability needs.

The school will make reasonable adjustments for disability and provide support for literacy or language needs. Complaints and appeal requests will be accepted in writing, by email, by telephone or in person where an alternative method is needed. Staff will record oral concerns and check the record with the complainant. Accessible information, interpretation or a suitable supporter will be arranged where needed.

A member of staff facing a complaint will receive sufficient information to respond fairly at the appropriate stage. Where safeguarding or police procedures apply, the case manager will take advice about when and how to inform the individual. Personal information will be shared only where necessary and lawful.

The Complaints Procedures

Informal stage

The school will seek to resolve concerns informally with the appropriate member of staff or governor, using the contact routes above. If the matter remains unresolved, or the complainant asks to proceed formally, the school will follow the formal stage. No complainant will be required to complete an informal meeting as a condition of access to the formal stage.

The person handling the informal concern will:

- ✚ acknowledge the complaint;
- ✚ make enquiries to establish the facts;
- ✚ seek advice as appropriate;
- ✚ attempt to resolve the matter informally;
- ✚ establish whether or not the complainant is satisfied;
- ✚ advise complainants of the next stages if they wish to proceed to a formal consideration of the complaint;

- ✚ make a brief note of the complaint and the outcome.

The school aims to complete the informal stage within 20 school days. A complainant seeking a formal response should normally contact the relevant recipient within 20 school days of the informal outcome. The school will consider late requests individually and will not apply a blanket refusal.

The informal stage will not be used if the allegations made refer to:

- ✚ criminal activity which may require the involvement of the police
- ✚ financial or accounting irregularities
- ✚ abuse of children.

Formal stage

At the formal stage, the headteacher will handle complaints about school provision or staff. An impartial governor or independent investigator identified through the Clerk will handle complaints concerning the headteacher or governors. The person handling the formal stage will:

- ✚ ensure the complainant is aware of the procedures
- ✚ record the complaint in writing, providing assistance or an alternative method of communication where needed, and check the recorded concerns with the complainant.
- ✚ formally acknowledge the complaint
- ✚ seek advice as appropriate
- ✚ give any member of staff or governor involved enough information to respond fairly, subject to safeguarding advice, confidentiality and data protection requirements.
- ✚ arrange a full and fair investigation by an appropriately skilled person without a conflict of interest.
- ✚ prepare a report as a result of the investigation and consider actions to be taken
- ✚ give the complainant a written outcome with reasons, any agreed action and the right to request an appeal through the Clerk within 20 school days. Provide an accessible alternative where needed.
- ✚ make a record of the complaint and its outcome, this should be retained for School records.

The school aims to complete the formal stage within 20 school days. Complaint details will not be shared with the whole governing body before the final stage, to protect the impartiality of any appeal. The exception is a complaint against the whole governing body, where members need the allegations to respond to an independent investigation. Governors will receive anonymised information for monitoring.

Appeals stage

A complainant dissatisfied with the formal outcome is entitled to request an appeal through the Clerk to Governors, normally within 20 school days of receiving the outcome. The school will accept an alternative method of communication where a reasonable adjustment is needed. The Clerk will record the request and arrange the hearing.

The appeal will be heard by three suitably skilled, impartial governors. No panel member will have taken part in the events complained about, investigated the complaint or have a conflict of interest. If sufficient impartial governors are unavailable, the Clerk will arrange an independent ad hoc panel, seeking support from Rochdale governor services or the Manchester Diocesan Board of Education and following the applicable governance regulations.

The Clerk will provide hearing arrangements and share relevant evidence with the parties and panel in advance, allowing reasonable preparation time. Each party will have an opportunity to explain their case and respond to the evidence, in person or in writing. A complainant is entitled to bring a suitable supporter or interpreter. Reasonable adjustments will be made. The Committee will:

- ✚ consider the written evidence supplied by both parties.
- ✚ consider the complaint and the Headteacher's (or Chair's) action

- ✚ invite the complainant and the person who handled the formal stage, with arrangements supporting a fair and accessible hearing.
- ✚ seek advice and support as necessary.

At the end of their consideration the Committee will:

- ✚ determine whether to dismiss or uphold the appeal in whole or part, including, if appropriate, referring the matter back to the Headteacher/Chair of Governors for further consideration
- ✚ where upheld, decide on appropriate action
- ✚ give the complainant and the person who handled the formal stage a written decision with reasons, any action to be taken and information about further external routes.
- ✚ advise the complainant of any further action they could take if they remain dissatisfied.

The Clerk will record the appeal outcome and agreed action in the complaints register. The governing body will receive an anonymised summary for monitoring once the procedure is complete.

This stage would normally be expected to take no more than 20 school days.

In cases where the matter has been referred back for further consideration the Complaints Appeals Committee will be reconvened.

Further stages

There is no additional appeal stage to Rochdale Borough Council or the Manchester Diocesan Board of Education under this procedure. After completing the school's procedure, a complainant concerned about its handling or compliance with education law should follow the Department for Education route explained in Next stages below.

Withdrawal of a complaint

The school will ask a complainant wishing to withdraw their complaint to confirm the request in writing. Where an adjustment is needed, staff will record an oral request and check its accuracy with the complainant. Withdrawal will not prevent necessary safeguarding or other statutory action.

Complaints about a governor, the Chair of Governors or the Governing Body

Complaints about an individual governor or the Chair will be submitted to the Clerk to Governors. The Clerk will arrange a formal investigation by a suitably skilled and impartial governor or independent investigator who is not the subject of the complaint and has no conflict of interest.

A complainant dissatisfied with the formal outcome will have a separate appeal to an impartial complaints panel. The investigator and anyone previously involved will not sit on the appeal panel.

Where the complaint concerns the whole governing body, both the Chair and Vice Chair, or circumstances preventing an impartial internal investigation, the Clerk will arrange an independent investigation followed by an independent appeal panel. The Clerk will seek support from Rochdale governor services or the Manchester Diocesan Board of Education to identify suitable people and follow the relevant governance regulations. No person implicated in the complaint will decide its outcome.

The role of the Local Authority (LA) or Diocesan/Church Authority

Rochdale Borough Council and the Manchester Diocesan Board of Education provide advice and support on school governance and complaints handling. They are not an additional appeal stage under this school procedure. The governing body remains responsible for establishing, publishing and applying a lawful and fair complaints process.

The school will seek advice, where necessary, on:

- ✚ identifying the correct school or statutory procedure for a concern.

- ✚ arranging impartial investigations and appeal panels.
- ✚ interpreting national guidance and the relevant governance requirements.

Manchester Diocesan Board of Education governance support:
DBEGovernance@manchester.anglican.org.

Next stages

After completing the school's complaints procedure, a complainant concerned about its handling or the governing body's compliance with education law should contact the Department for Education. DfE considers whether statutory duties and the published procedure have been followed, and whether the governing body has acted unreasonably in carrying out its education functions. This is not a further school appeal hearing on the merits of the original complaint.

DfE's published guidance describes exceptions to completing local procedures first, including risks of harm, children missing education, obstruction of access to the published procedure and evidence of unlawful or unreasonable action. Urgent safeguarding concerns should be referred immediately through the appropriate safeguarding or police route.

Ofsted considers concerns affecting the school as a whole, including education, pupils' wellbeing and safety. It does not provide an individual appeal against a school complaints decision. Current external routes are set out on GOV.UK under Complain about a school.

[GOV.UK Complain about a school](https://www.gov.uk/complain-about-a-school)

Complaints Record

The school will keep a written record of formal complaints, investigations, decisions, actions and outcomes. Records will be confidential, stored securely and retained in accordance with the school's retention schedule, UK GDPR and the Data Protection Act 2018. Access will be limited to those with a legitimate need, subject to lawful information rights. The governing body will use anonymised information to identify learning and improve practice.

Serious allegations or complaints

Where an allegation suggests criminal activity, the appropriate police reporting route will take priority. The headteacher, or Chair where the headteacher is implicated, will seek advice from the relevant safeguarding, HR or legal service. Immediate risks to safety require urgent action.

Allegations of financial or accounting irregularity, misuse of public funds or assets will follow the school's financial, whistleblowing and employment procedures. The appropriate Rochdale Borough Council finance officer will be notified as required by the Scheme for Financing Schools. Anyone implicated will not investigate or decide the allegation. Police, HR and legal advice will be sought where appropriate.

Child protection concerns and allegations against adults working with children will follow the school's safeguarding policy, Keeping children safe in education 2026 and Rochdale safeguarding procedures. The headteacher will act as case manager for allegations against staff. Where the allegation concerns the headteacher, it will be reported to the Chair of Governors. If a conflict prevents a safe internal referral, the concern should be raised directly with the Local Authority Designated Officer.

The case manager will consult the Rochdale Local Authority Designated Officer (LADO) without delay where an allegation appears to meet the harm threshold, or where advice is needed. Rochdale LADO contact: lado@rochdale.gov.uk. Low-level concerns will follow the school's safeguarding arrangements. The designated safeguarding lead or deputy will secure the child's welfare and refer to children's social care and the police where required. Immediate risk or an emergency requires an immediate referral.

Safeguarding or police action will not wait for the 20-school-day complaints timescales. The school will coordinate its response with the relevant agencies and avoid prejudicing their investigations. Suspension will not be an automatic response. The case manager will consider risk, alternatives, LADO and HR advice, record the decision and provide support for those involved. Any suspension will follow the school's employment procedures.

Vexatious Complaints

The school will distinguish the substance of a complaint from a person's conduct. A complainant's dissatisfaction with an outcome, use of an appeal, referral to an MP or request for explanations will not, on its own, justify refusing to investigate or preventing access to the complaints procedure.

Threats, harassment or serious disruption will be addressed through proportionate safeguards in the annex. A decision to stop repeated correspondence on a completed issue will require the safeguards described there. New complaints and new material information will receive proper consideration. The school will not refuse all future complaints from an individual.

Monitoring and review

The governing body will review this policy annually and sooner following changes to law or guidance. It will monitor anonymised complaints information, check agreed actions have been completed and use findings to improve school practice. The school will publish the current procedure on its website and provide accessible copies through the school office.

Annex to Complaints Policy

Policy for dealing with Unreasonably Persistent Complaints, Harassment or Aggression

The Headteacher and staff deal with specific complaints as part of their day-to-day management of the school in accordance with the School's Complaints Procedure.

The majority of complaints are handled in an informal manner and are resolved quickly, sensitively and to the satisfaction of the complainant. The school is extremely committed to promoting positive relationships with all members of the school community, regardless of age, sex, religion, ability or culture and it welcomes the opportunity to address and resolve issues that may arise.

However, there are rare occasions when complainants behave in an unreasonable manner when raising and/or pursuing concerns. The consequences are that the actions of the complainants begin to impact negatively on the day-to-day running of the school and directly or indirectly the overall well-being of the children or staff in the school. In these exceptional circumstances the school may take action in accordance with this policy.

What does the school expect of any person wishing to raise a concern?

The school expects anyone who wishes to raise concerns with the school to:

- ✚ treat all members of the school community with courtesy and respect;
- ✚ respect the needs of pupils and staff within the school;
- ✚ avoid the use of violence, or threats of violence, towards people or property;
- ✚ avoid any aggression or verbal abuse;
- ✚ recognise the time constraints under which members of staff in schools work and allow the school a reasonable time to respond to a complaint;
- ✚ recognise that resolving a specific problem can sometimes take time;
- ✚ follow the school's complaints procedure (and for staff members to follow the appropriate internal staff procedure).

What do we mean by 'unreasonably persistent complainants'?

The school will assess evidenced conduct and its impact rather than label a person unreasonable because they raise a complaint. Legitimate appeals, requests for reasonable adjustments, referral to an MP and properly exercised information rights will not, by themselves, be treated as unreasonable behaviour.

Unreasonable behaviour may include the following (not an exhaustive list):

- ✚ repeated contacts which cause significant disruption after a reasonable response and clear explanation of the appropriate next step.
- ✚ prolific correspondence or excessive e-mail or telephone contact about a concern or complaint;
- ✚ persistent demands for outcomes which are unlawful or impossible, despite a clear explanation.
- ✚ an insistence upon pursuing complaints in an unreasonable manner;
- ✚ an insistence on only dealing with the Headteacher on all occasions irrespective of the issue and the level of delegation in the school to deal with such matters;
- ✚ an insistence upon repeatedly pursuing a complaint when the outcome is not satisfactory to the complainant but cannot be changed, for example, if the desired outcome is beyond the remit of the school because it is unlawful.
- ✚ repeatedly making substantially the same allegations after fair investigation and completion of the procedure, without new information.
- ✚ abusive or threatening behaviour or language towards school staff.
- ✚ failing to specify grounds of the complaint, despite offers of assistance from the school.

What is harassment?

We regard harassment as including the unreasonable pursuit of issues or complaints, particularly if the matter appears to be pursued in a way intended to cause personal distress, rather than to seek a resolution.

Behaviour may fall within the scope of this policy if:

- ✚ it appears to be deliberately targeted at one or more members of school staff or others, without good cause;
- ✚ the way in which a complaint or other issue is pursued (as opposed to the complaint itself) causes undue distress to school staff or others;
- ✚ it has an unjustifiably significant and disproportionate adverse effect on the school community.

School's responses to unreasonably persistent complaints or harassment

This policy is intended to be used in conjunction with the school's complaints procedure. Taken together, these documents set out how we will always seek to work with parents, carers and others with a legitimate complaint to resolve a difficulty.

Where evidenced conduct causes significant disruption or distress, the headteacher or Chair will consider an individual, proportionate response. The school will take account of disability and communication needs, explain the reasons, record its decision and set a review date. The following measures will be used where appropriate:

- ✚ explain the behaviour causing concern and request a change in approach.
- ✚ give a written warning explaining unacceptable conduct, expected behaviour and the consequences of continued disruption, unless urgent safety action is required.
- ✚ arrange meetings with a second member of staff present and keep an accurate record.
- ✚ agree a single point of contact or a suitable communication method, with reasonable adjustments and urgent safeguarding communication protected.
- ✚ set a proportionate schedule for routine correspondence. This will not override complaints deadlines, urgent pupil welfare matters or statutory duties to provide information.
- ✚ seek legal advice where harassment, threats or other unlawful conduct require a further response.

Before stopping repeated correspondence on the same issue, the school must have completed the complaints procedure, taken every reasonable step to address the concerns, given a clear statement of its position and the available external routes, and received further contacts repeating substantially the same points without new material information.

The school will give written notice explaining the decision and its scope. Any communication restriction will state its reasons, duration and review date. The person affected will be told how to request a review through the Clerk by the Chair or another impartial governor, excluding anyone with a conflict of interest. Restrictions will apply to the relevant issue or conduct, rather than create a blanket refusal of contact from a person.

New complaints and new material information will always be considered. Statutory requests for pupil information, freedom of information and data protection rights will follow the relevant legal timescales and procedures. A person's difficulty communicating or the complexity of their questions will not, on its own, justify stopping responses.

Physical or verbal aggression

The governing body will not tolerate any form of physical or verbal aggression against members of the school community. If there is evidence of any such aggression the school may:

- ✚ require the person to leave the premises or impose a temporary restriction on entry where necessary to protect pupils, staff or others. Any continuing ban will follow the review safeguards below.
- ✚ seek legal advice about an appropriate civil injunction or other available court order.
- ✚ seek legal advice about harassment and other relevant legislation.
- ✚ contact the police where threats, criminal conduct or immediate safety risks require their involvement. Removal from school premises will follow applicable law, including section 547 of the Education Act 1996 where its conditions are met.

Review of restrictions on access to the school site

The school will give a person affected by a site ban written reasons, explain its scope and provide an opportunity to make representations. The decision will be reviewed promptly by the Chair or a committee of impartial governors, excluding anyone with a conflict of interest. Where urgent safety action precedes representations, a prompt review will still take place. The outcome will state whether the ban is confirmed or lifted, its duration and the next review date. The person will be told how to submit their views through the Clerk.

Restrictions on entry will not remove a parent's information rights or access to the complaints procedure. The school will arrange an appropriate way to discuss their child's education and welfare.

Guidance and legislation

[Department for Education Best practice guidance for school complaints procedures](#)

[Department for Education Keeping children safe in education 2026](#)

[Rochdale Safeguarding Partnership Allegations Management](#)