LDST
Liverpool Diocesan Schools Trust

Complaints Policy and Procedure

Including procedures for managing AI-generated correspondence and unreasonable, persistent or vexatious complaints.

This policy should be read alongside the joint Department for Education, Ofsted and Parentkind guidance for schools and parents on managing complaints (published January 2026), and the Trust's Acceptable Use of AI, Data Protection and Records Retention policies.

OUR TRUST PRAYER

Heavenly Father,
Let peace, friendship and love
grow in our schools.
Send the Holy Spirit to give
excellence to our learning,
love to our actions and
joy to our worship.
Guide us to help others,
so that we may all
Learn, Love and Achieve,
Together with Jesus.

Amen

Related policies

This policy should be read alongside the following Trust policies, all of which are available on the Trust website or on request from the school office:

Related policy	Where to find it
Admissions Policy	https://www.stjamesceprimary.co.uk/page/admissions/129178
Behaviour Policy	https://spaces.schoolspider.co.uk/uploads/694/page/86192309_page_file.pdf?ofn=st-james-behaviour-policy-2026-2027.pdf
Child Protection and Safeguarding Policy	https://spaces.schoolspider.co.uk/uploads/694/page/78403706_page_file.pdf?ofn=st-james-primary-school-child-protection-policy-2026---2027.pdf
Code of Conduct for Trustees, Governors and Staff	Can be given on request.
Data Protection Policy and Privacy Notices	https://www.ldst.org.uk/page/?title=Legal+Documents+and+Policies&pid=39
Equality Information and Objectives	https://www.ldst.org.uk/page/?title=Legal+Documents+and+Policies&pid=39
Exclusion Policy	https://www.ldst.org.uk/page/?title=Legal+Documents+and+Policies&pid=39
Managing Allegations Against Staff Policy	Can be given on request.
SEND Policy and Information Report	https://www.stjamesceprimary.co.uk/page/send/129589
Staff Disciplinary Policy	Can be given on request.
Whistleblowing Policy	https://www.ldst.org.uk/page/?title=Legal+Documents+and+Policies&pid=39
Acceptable Use of Artificial Intelligence Policy	https://www.ldst.org.uk/page/?title=Legal+Documents+and+Policies&pid=39

1. Introduction and general principles

We want all stakeholders to flourish in our schools. In order for this to happen, LDST works in collaboration, valuing the differences within each local context, so that children can grow and achieve excellence. The Trust believes teachers, parents, carers, pupils and all members of each school's community can make a significant contribution to the education of young people, and therefore should be listened to if there are things that could be improved. We aim to work with parents and carers in a spirit of hope and compassion to overcome any complaints and issues, and this policy sets out how we will achieve this together.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage and the Trust takes concerns seriously and will make every effort to resolve matters as quickly as possible. Many issues can be resolved informally, without the need to use the formal stages of this procedure.

This policy has regard to:

- Part 7 of the Education (Independent School Standards) Regulations 2014;
- the Department for Education's Best Practice Guidance for Academies' Complaints Procedures;
- the joint guidance published by the Department for Education, Ofsted and Parentkind in January 2026 (*School Guide to Parent Complaints* and *Parent Guide to School Complaints*), which the Trust's own policy has separately been reviewed against, and the further sector briefing issued by ASCL in February 2026 (together, **"the joint DfE/Ofsted/Parentkind guidance"**); and
- the Trust's obligations under the Equality Act 2010, the Data (Use and Access) Act 2025 and UK GDPR.

The joint DfE/Ofsted/Parentkind guidance recognises that parents and carers can feel high levels of anxiety when a concern touches their child, and encourages schools and families to work together in a positive, respectful and solution-focused way. This policy adopts the ethos and five-step approach of that guidance throughout: knowing the difference between feedback, a concern and a complaint; taking issues to the right person, at the right level, first time; keeping communication clear, factual and proportionate; understanding realistic timescales; and knowing when and how to escalate a matter that remains unresolved.

The aims of this policy are to:

- provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint;
- ensure that everyone in the school and Trust understands what to do if a complaint is received;
- ensure that all complaints are handled fairly, openly and without undue delay;
- ensure that complaints are, wherever possible, resolved and that relationships are repaired; and
- protect staff, pupils and the wider school community from repeated or excessive correspondence and behaviour, including AI-generated, that is unreasonable, abusive or disproportionate.

When the Trust Board or a Local Governing Body (LGB) adopts or approves a policy, and a school implements that policy, this is part of the day-to-day running of the school. An objection to the content of a policy itself, or to an operational or curriculum decision properly taken by senior leaders, is not a matter for this complaints procedure — see Section 2.4 below.

2. What this policy covers

2.1 Feedback, concerns and complaints

A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'. A complaint may be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action'.

Upon receipt of any expression of dissatisfaction, the school will first categorise the matter as one of the following:

Category	What it means	How it is handled
Feedback	General observations or suggestions where no formal outcome or investigation is required.	Noted and, where useful, shared with the relevant team. No formal response is required.
Concern	An informal expression of worry or doubt where immediate reassurance or operational clarification is sought.	These will be handled informally under Stage 1.
Formal complaint	A detailed allegation of statutory breach, systemic failure, or serious policy omission requiring formal investigation.	Handled under Stage 2 or 3 of this procedure.

If you have difficulty discussing a concern with a particular member of staff, we will respect your views and the Headteacher will refer you to another member of staff; similarly, if the member of staff directly involved feels unable to deal with a concern, the Headteacher will refer you elsewhere. The ability to consider the concern objectively and impartially is more important than seniority.

2.2 Who can use this policy

This complaints procedure is not limited to parents or carers of children registered at any of our schools. Any person, including a member of the public, may make a complaint to the Trust about any provision of facilities or services that we provide, unless the complaint is dealt with under a separate statutory procedure (such as an appeal relating to exclusion or admissions).

Former pupils and former parents/carers may also raise a complaint about matters that arose while their child was on roll, provided the time limits at Section 5 are met.

2.3 What this policy covers

This procedure covers all complaints about any provision of community facilities or services by the Trust, other than complaints that are dealt with under other statutory procedures, including those listed below.

2.4 What is excluded from this policy

To make this as clear as possible for complainants, the table below sets out matters that are dealt with under a different route and are not considered under this policy. If a complaint is received that falls wholly or partly within one of these categories, the Trust will explain this and signpost the correct route.

Excluded matter	Correct route
Admissions to schools	The Trust is the admissions authority; concerns about admissions should be raised with the relevant local governing body.
Statutory assessments of special educational needs (SEN)	Concerns about statutory SEN assessments, or about the content of an EHC Plan, should be raised directly with the local authority, which is responsible for assessment decisions and for issuing, maintaining and resourcing an EHCP. The SEND Information, Advice and Support Service (SENDIASS) provides free, confidential, impartial advice — [insert local SENDIASS link]. Complaints about the school's delivery of SEN support it is directly responsible for can be raised under this policy — see also Section 3.3.
School re-organisation proposals	Concerns about school re-organisation proposals should be directed to the Trust Board of Directors, marked "FAO Clerk to the Board of Directors", at [insert Trust email].
Matters likely to require a Child Protection investigation	Dealt with under the Child Protection and Safeguarding Policy. Serious concerns can be raised directly with the Local Authority Designated Officer (LADO) or Multi-Agency Safeguarding Hub (MASH) — [insert local contact details].
Exclusion of a pupil	Dealt with under the statutory exclusion review process. Complaints about the application of the Behaviour Policy can be made through this complaints procedure — see the Exclusion Policy for details.
Whistleblowing	Dealt with under the Trust's internal Whistleblowing Policy. The Secretary of State for Education is the prescribed person for education whistle-blowers who do not wish to raise matters directly with their employer.
Staff grievances	Dealt with under the Trust's internal grievance procedure.
Staff conduct	Dealt with, if appropriate, under the Trust's internal disciplinary procedure. Complainants will not be informed of any disciplinary action taken, but will be told that the matter is being addressed.
Data protection and UK GDPR complaints	Dealt with under Appendix 6 (Data (Use and Access) Act 2025 Complaints Procedure), not under this policy.
Complaints about services provided by other providers using	Such providers should have their own complaints procedure; please contact them directly.

Excluded matter	Correct route
school premises or facilities	
Disagreement with the content of a Trust or LGB policy	This is a governance matter, not a complaint. It should be raised in writing with the Clerk to the relevant Local Governing Body or Trust Board.
Day-to-day operational, curriculum and timetabling decisions	These are decisions for headteachers and senior leaders under their contract of employment, and are not open to challenge under this policy, save where the complaint concerns unfair or unreasonable application of a policy to an individual.

If other bodies are investigating aspects of the complaint — for example the police, local authority safeguarding teams or a Tribunal — this may affect our ability to adhere to the timescales in this procedure, or result in the procedure being suspended until those investigations conclude; we will inform you of a proposed new timescale. If a complainant commences legal action against the Trust in relation to their complaint, we will consider whether to suspend this procedure until those proceedings have concluded.

> *Publishing details of an active complaint on social media or public forums compromises the Trust's ability to conduct a fair, confidential and objective investigation. Where a complainant publishes details of an ongoing complaint publicly, the Trust reserves the right to pause formal complaint timelines until such material is removed.*

3. How to raise a concern or make a complaint

A concern or complaint can be made in person, in writing or by telephone. It may also be made by a third party acting on behalf of a complainant, provided they have appropriate consent to do so. A template complaint form is included at Appendix 1; the school office can help you complete it, and you can also ask a third-party organisation, such as Citizens Advice, to assist.

- **Complaints against school staff** (except the Headteacher) should be made in the first instance to the Headteacher via the school office, marked Private and Confidential.
- **Complaints about the Headteacher** should be addressed to the Chair of Governors via the school office, marked Private and Confidential.
- **Complaints about an individual governor** should be addressed to the Chair of Governors via the school office.
- **Complaints about the CEO, the Chair of the Local Governing Body or a Director of the Trust** should be addressed to the Chair of the Board of Directors via the Trust office.

In line with the joint DfE/Ofsted/Parentkind guidance, it also helps to take an issue to whoever is closest to your child and the situation first — for example, a class teacher for a classroom issue, or a senior leader for a year-group or behaviour issue — and, when you write in, to keep a short record of what happened, state the specific outcome you are hoping for, and check this policy for the timescales that apply.

In accordance with equality law, we will consider reasonable adjustments to enable complainants to access and complete this procedure — for example, providing information in alternative formats, assisting with raising a formal complaint, or holding meetings in accessible locations.

3.1 If you need help raising a concern

If you need help setting out your concern or complaint, the school office can advise or suggest sources of independent support, including reasonable requests for interpretation or additional support for a complainant who is a child or young person, or who has a disability.

3.2 Use of AI tools when raising a concern

Some people like to use AI tools to help organise their thoughts. We recommend against using public AI tools because they can store and republish personal information, such as sensitive details about your child. AI tools can also introduce inaccurate information, like old rules or laws from other countries, which can delay us responding to you. You should always carefully check the output to make sure it is accurate.

The joint DfE/Ofsted/Parentkind guidance similarly advises parents to use AI only "with caution", because it does not always correctly cite legislation and can make a straightforward concern more complicated than it needs to be.

If we are finding it difficult to identify the key concerns from what has been shared, we may suggest a meeting or call to help us focus on what matters most and respond as accurately and helpfully as possible. Our fuller approach to AI-generated correspondence, including how it is logged, is set out at Section 8 and Appendix 5.

3.3 Help with special educational needs and disabilities (SEND)

We work together with the local authority to provide support for children with SEND. We will always try to help, but for some things that are outside of our control we will refer you to the local authority.

What we are responsible for: we provide teaching, with reasonable adjustments to help your child, and support from our own resources (SEN support). We monitor your child's progress, put support plans in place, and review these with you.

What the local authority is responsible for: deciding whether to assess a child for an Education, Health and Care Plan (EHCP), and issuing, maintaining and funding the EHCP.

Some support depends on national or local funding decisions outside our control. We will always do our best within the resources available. If you are unsure who is responsible for a particular aspect of SEND support, please ask — see also Section 2.4.

4. Anonymous complaints

We will not normally investigate anonymous complaints. However, the Headteacher, or Chair of Governors if appropriate, will determine whether the complaint warrants an investigation.

An anonymous complaint that raises a safeguarding concern will always be considered under the Child Protection and Safeguarding Policy.

5. Time scales

You must raise the complaint within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

5.1 Complaints received outside of term time

We will consider complaints made outside of term time to have been received on the first school day after the holiday period.

6. The process

6.1 Resolving complaints

At each stage, the Trust wants to resolve the complaint. If appropriate, we will acknowledge that the complaint is upheld in whole or in part, and may offer one or more of the following: an explanation; an admission that the situation could have been handled differently or better; an assurance that we will try to ensure the event complained of will not recur; an explanation of the steps that have been or will be taken and the timescale for any changes; an undertaking to review school policies in light of the complaint; and/or an apology.

6.2 Withdrawal of a complaint

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing.

6.3 Stage 1 — Informal complaints

It is hoped that most concerns can be expressed and resolved on an informal basis. Concerns should be raised with the class teacher, year head/subject head or Headteacher. Complainants should not approach individual governors to raise concerns or complaints — they have no power to act individually, and doing so may also prevent them considering the complaint at Stage 3.

At the conclusion of their investigation, the person investigating the concern will provide an informal written response within 10 working days of receipt. If the issue remains unresolved, the next step is to make a formal complaint.

6.4 Stage 2 — Formal complaints

Formal complaints must be made to the Headteacher (unless they are about the Headteacher), via the school office, in person or in writing — preferably using the Complaint Form at Appendix 1 — marked Private and Confidential.

- The Headteacher will record the date the complaint is received and acknowledge it in writing within 5 working days.
- The Headteacher will seek to clarify the nature of the complaint, what remains unresolved, and the outcome the complainant would like to see, and may delegate the investigation (but not the decision) to another senior leader.
- During the investigation, the Headteacher (or investigator) will, if necessary, interview those involved, allowing them to be accompanied if they wish, and will keep a written record of any meetings.

- The Headteacher will provide a formal written response within 15 working days of receipt. If this deadline cannot be met, the complainant will be given an update and a revised date within a further 7 working days.
- The response will detail any actions taken to investigate the complaint, a full explanation of the decision and reasons, and, where appropriate, details of any action the school will take to resolve it. It will also explain how to escalate the complaint if the complainant remains dissatisfied.

If the complaint is about the Headteacher or a member of the Local Governing Body, the Chair of Governors will complete the actions above, and the complaint should be made to the Clerk via the school office, marked Private and Confidential. Complaints about the CEO, Chair of the Local Governing Body or a member of the Board of Directors must be made to the Chair of the Board of Directors via the Clerk, at the registered address of the Trust, marked Private and Confidential. Where a complaint is jointly about the Chair and Vice-Chair, or about the entire or majority of the Board of Directors, the Board will appoint an independent investigator, who will report their findings to the Board.

Records

A written record will be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing. All correspondence, statements and records relating to individual complaints will be kept confidential, except where the Secretary of State, or a body conducting an inspection under section 109 of the Education and Skills Act 2008, requests access to them.

6.5 Stage 3 — Panel hearing

If the complainant is dissatisfied with the outcome at Stage 2, they may escalate to Stage 3 — a panel hearing of at least three people who were not directly involved in the matters complained of, with at least one panel member independent of the management and running of the school. This is the final stage of this procedure.

- A request to escalate must be made to the Clerk, via the school office, within 5 working days of the Stage 2 response, marked Private and Confidential. The Clerk will acknowledge it in writing within 5 working days. Requests received outside this time frame will only be considered where exceptional circumstances apply.
- The Clerk will aim to convene a meeting within 20 working days of receipt of the Stage 3 request, and will keep the complainant informed if this is not possible. If the complainant rejects three proposed dates without good reason, the Clerk will decide when to hold the meeting, which will then proceed on the basis of written submissions from both parties.
- At least 15 working days before the meeting, the Clerk will confirm the date, time and venue, and request any further written material at least 10 working days before the meeting. Material will be securely circulated to all parties at least 5 working days beforehand.
- A complainant may be accompanied by a relative or friend. Legal representatives are not generally encouraged, save in exceptional circumstances (for example, where a staff member called as a witness wishes to be supported by their union or legal representative). Media representatives are not permitted to attend.
- The committee will not normally accept covertly obtained recordings as evidence, and will not consider new complaints or unrelated evidence at this stage — new complaints must be raised from Stage 1.

- The committee may uphold or dismiss the complaint, in whole or in part, and, if upheld, will decide on appropriate action and may recommend changes to systems or procedures.
- The Chair of the Committee will provide the complainant and the school with a full written explanation of the decision and reasons within 10 working days, including how to contact the DfE if the complainant remains dissatisfied with how the complaint has been handled.

6.6 Complaints about the Trust, the CEO or a Director

A complaint about the Trust should be sent to the CEO, who will acknowledge it within 5 working days, confirm it will be investigated under Stage 2, and confirm a response date. Following investigation, the CEO will confirm the outcome within 15 working days (or explain any delay and provide a revised date within 7 working days).

A complaint about the CEO or a Director should be investigated by the Chair of the Board of Directors; a complaint about the Chair will be referred to the Vice-Chair. If dissatisfied, the complainant may ask the Clerk to the Board, within 5 working days, for the complaint to be heard by a Complaints Panel, following the same process and timescales as Stage 3 above. Where the complaint is jointly about the Chair and Vice-Chair, or about the entire or majority of the Board, the panel will be entirely independent.

6.7 Next steps

If the complainant believes the Trust did not handle their complaint in accordance with the published procedure, or acted unlawfully or unreasonably in the exercise of its duties under education law, they can contact the Department for Education (DfE) after completing Stage 3.

The DfE will not normally re-investigate the substance of a complaint or overturn the Trust's decision. It will consider whether the Trust has adhered to education legislation and any statutory guidance connected with the complaint, including Part 7 of the Education (Independent School Standards) Regulations 2014.

Complainants are reminded that external bodies, including Ofsted, the DfE and local MPs, do not act as an appeal court and will not investigate individual disputes between a parent and the school. External agencies will direct complainants back to the Trust's internal procedure until all internal stages, including the Stage 3 Panel Hearing, have been fully exhausted.

The complainant can refer their complaint to the DfE online via the school complaint portal at [www.gov.uk/complain-to-dfe] (https://www.gov.uk/complain-to-dfe), by telephone on 0370 000 2288, or by writing to: Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD.

7. Working together: our expectations of each other

In line with national guidance published jointly by the DfE, Ofsted and Parentkind, the Trust is committed to resolving concerns swiftly, fairly and constructively through open partnership. Early resolution relies on clear expectations, mutual respect, and use of the right channel. We ask complainants to follow these principles:

- **Concise and factual summaries:** requests for information or formal grievances should set out a clear, factual account of specific events and the specific outcome sought.

- **Authenticity (AI and automated correspondence):** correspondence should reflect a genuine, personal account. Correspondence generated via automated template services, third-party claim aggregators, or AI tools that does not detail the personal impact on the pupil, or that mis-cites legislation, may be returned with a request for an authentic, concise summary — see Section 8 and Appendix 5.
- **Proportional contact:** complainants should refrain from sending repeated, duplicate or daily correspondence while an informal review or formal investigation is actively under way, as high message volume delays investigation timelines.
- **Confidentiality and public forums:** active complaints must not be shared or discussed on social media or public forums — see Section 2.4.

In return, the Trust and its schools will acknowledge that a concern or complaint can be a source of real worry, respond with courtesy and empathy as well as accuracy, keep this policy easy to find on the school website, keep to the timescales in this policy or explain clearly when that is not possible, and apply this policy fairly and consistently.

Where communication from a complainant becomes disproportionate, repetitive or otherwise unreasonable, the Trust will follow the process at Appendix 4. This does not remove a complainant's right to have a legitimate, properly raised concern considered under this policy.

8. Use of artificial intelligence in complaints correspondence

While the Trust welcomes genuine communication regarding pupil welfare and education, correspondence generated via third-party AI tools, automated templates, or claims management services that fails to state a specific factual account, or to detail the personal impact on the pupil, or that mis-cites legislation, may be returned. Complainants will be asked to provide a clear, personal and concise summary of their specific concerns before the matter is progressed.

This is consistent with the joint DfE/Ofsted/Parentkind guidance, which specifically cautions parents that AI does not always correctly cite legislation and can make a complaint longer and more complex than it needs to be, and with education press reporting a marked rise in lengthy, AI-generated complaints citing misapplied legal authority.

Use of AI is not, of itself, a reason to treat a complaint less seriously, or to refuse to engage — the Trust's focus remains on the substance of a concern. Where correspondence appears AI-generated and is lengthy or difficult to follow, we may suggest a meeting or call to help focus on what matters most and respond as accurately and helpfully as possible.

- Correspondence that meets this description will be logged — see Appendix 5 for the AI-Generated Correspondence Log and the model request letter.

Where AI-generated correspondence forms part of a wider pattern of unreasonable or excessive contact, the Trust may instead, or in addition, apply Appendix 4.

9. Data protection and confidentiality

Personal data shared as part of a concern or complaint will be processed in accordance with the Trust's Data Protection Policy and Privacy Notices, and only shared with those who need it to investigate and resolve the matter.

Complaints about how the Trust has handled a data protection request, or a suspected personal data breach, are not dealt with under this policy. This is an appendix to the main complaint policy, reflecting the requirement for standalone data use and access complaints to be handled under a separate procedure — see Appendix 6 (Data (Use and Access) Act 2025 Complaints Procedure). Any complaint linked to other matters, whether raised formally or informally, is dealt with under the standard process in this policy.

10. Monitoring, review and equality

The Complaints Co-ordinator in each school and at Trust level, will maintain a record of concerns and complaints, including those managed under Appendix 4 (unreasonable/vexatious) and Appendix 5 (AI-generated correspondence). An anonymised summary, including numbers and themes, will be reported to the Local Governing Body and to the Board of Directors termly, to help the Trust identify trends and improve practice.

This policy has been assessed against the Trust's Equality Information and Objectives. The Trust will consider reasonable adjustments for any complainant with a disability, and additional support for any complainant who is a child or young person, at every stage of this procedure.

10.1 Review

This policy will be reviewed by the Board of Directors at least every two years, or sooner if there is a significant change in legislation or DfE/Ofsted/Parentkind guidance.

Appendix 1: Complaint form — Private and Confidential

Please complete and return to the Headteacher, via the school office, who will acknowledge receipt and explain what action will be taken.

Your details	
Your name	
Pupil's name (if relevant)	
Your relationship to the pupil (if relevant)	
Address / postcode	
Daytime telephone number	
Evening telephone number	
Email address	

Your complaint	
Please give details of your complaint, including whether you have spoken to anybody at the school about it	
What actions do you feel might resolve the problem at this stage?	
Are you attaching any paperwork? If so, please give details	

Additional information	
Was any part of this complaint prepared with the help of an AI tool? If yes, please confirm you have checked its accuracy against the specific facts of your complaint.	Yes / No

Signature	**Date**

Official use

Date acknowledgement sent	
By whom	
Complaint referred to	
Action taken	
Date	

Appendix 2: Stage 3 agenda

Name of school	
Name of complainant	
Date	
Time	
Location	

Name of participant	Position	Purpose
		Panel member 1 (Chair)
		Panel member 2
		Panel member 3
		Complainant
		Complainant's companion
		School representative

Item	Responsible
1. Introduction and meeting procedure	Chair
2. Summary of complaint	Complainant
3. Questions to the complainant	Panel
4. Representations from the investigator	Investigator
5. Questions to the investigator	Panel
6. Summing up from the complainant	Complainant
7. Summing up from the panel	Chair
8. Withdrawal of complainant, investigator and companion	Chair
9. Consideration of case by panel	Panel
10. Return of complainant, investigator and companion	Chair
11. Decision of the panel	Chair

> *Other committee members may ask questions at any point, and any reasonable request for an adjournment should be allowed at the Chair's discretion.*

Appendix 3: Roles and responsibilities

Complainant

The complainant should:

- raise concerns as soon as possible after an issue arises, and within the timescales at Section 5;
- explain the complaint as clearly and factually as possible, including what outcome is being sought;
- co-operate with the school or Trust in seeking a resolution;
- respond promptly to, and clearly, any reasonable request for further information; and
- treat all involved with courtesy and respect.

Investigator

The Investigating Officer (IO) should:

- have had no prior involvement in the events leading to the complaint;
- clarify with the complainant the outcome they are seeking;
- interview those involved and/or ask for their written comments, allowing anyone complained about a fair opportunity to respond;
- collate and analyse relevant evidence;
- establish facts, and make a judgement, based on the balance of probabilities;
- respect the confidentiality of all parties as far as possible; and
- prepare a clear written report and recommendations.

Complaints co-ordinator

(This may be the Headteacher, CEO, a designated governor or trustee, or another member of staff providing administrative support.) The complaints co-ordinator should:

- acknowledge complaints and keep the complainant informed of progress;
- keep clear records at each stage, including outcomes and timescales met or missed;
- maintain the AI-Generated Correspondence Log at Appendix 5 and any communication plans under Appendix 4;
- liaise with the Chair of Governors/Trustees or Clerk to ensure the smooth running of the procedure; and
- be alert to the need for additional support (for example, interpretation, or support for a child/young person complainant).

Clerk to the Local Governing Body / Board of Directors

The Clerk should:

- ensure all parties are aware of their relevant legal rights, including under the Equality Act 2010, Freedom of Information Act 2000, and Data (Use and Access) Act 2025;
- arrange the date, time and venue of any panel meeting, ensuring accessibility;

- collate and circulate written material to all parties in advance, within an agreed timescale;
- record the proceedings and circulate minutes; and
- notify all parties of the panel's decision.

Committee chair

The Chair, nominated in advance, should ensure that:

- both parties can submit relevant information in advance of the meeting;
- the meeting is informal, courteous and not adversarial;
- a complainant unused to such meetings, particularly a child or young person, is put at ease;
- the panel's remit is explained;
- both parties have a fair opportunity to make their case and seek clarity;
- key findings of fact are made, and the panel acts independently and with an open mind; and
- the meeting is minuted.

Committee member

Committee members should be aware that:

- the panel must be, and be seen to be, independent and impartial — no member may have had prior involvement in the complaint;
- the aim is to resolve the complaint and, where possible, achieve reconciliation, while recognising a complainant may not be satisfied if the outcome does not find in their favour;
- many complainants feel nervous, inhibited or emotional in a formal setting; and
- where a child or young person is present, or is the complainant, extra care is taken to avoid intimidation, and their views are given equal weight to those of adults, with their welfare paramount.

Appendix 4: Managing unreasonable, persistent and vexatious complaints and complainants

1. Purpose

The Trust is committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who complain. We will not normally limit the contact complainants have with our school. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from behaviour that is abusive, offensive or threatening.

2. What counts as unreasonable behaviour

The Trust defines unreasonable behaviour as that which hinders our consideration of complaints because of the frequency or nature of the complainant's contact with the school, such as, if the complainant:

- refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;
- refuses to co-operate with the complaints investigation process;
- refuses to accept that certain issues are not within the scope of the complaints procedure;
- insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice;
- introduces trivial or irrelevant information which they expect to be taken into account and commented on;
- raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales;
- makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- changes the basis of the complaint as the investigation proceeds;
- repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed);
- refuses to accept the findings of the investigation where the complaint procedure has been fully and properly implemented and completed, including referral to the Department for Education;
- seeks an unrealistic outcome;
- makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with;
- uses threats to intimidate;
- uses abusive, offensive or discriminatory language or violence;
- knowingly provides falsified information; or
- publishes unacceptable information on social media or other public forums.

Complainants should try to limit their communication with the school that relates to their complaint while it is being progressed. It is not helpful if repeated correspondence is sent by letter, phone, email or text, as it could delay the outcome being reached.

3. Procedure

Step 1 — Informal discussion

Whenever possible, the Headteacher or CEO will discuss any concerns with the complainant informally before applying an 'unreasonable' marking.

Step 2 — Formal written warning

If the behaviour continues, the Headteacher will write to the complainant explaining that their behaviour is unreasonable and asking them to change it. The Trust will resist abuse of the complaints procedure and may reserve the right not to investigate complaints considered to be vexatious or malicious, or where the Headteacher or CEO is satisfied with the action the school has already taken, or proposes to take, to resolve the complaint.

Step 3 — Communication plan

For complainants who excessively contact the Trust, causing a significant level of disruption, we may specify methods of communication and limit the number of contacts in a communication plan, which will be reviewed after six months.

For added clarity, a communication plan may include one or more of the following, applied proportionately and only for as long as necessary:

- directing all future contact to a Single Point of Contact (SPOC);
- restricting the method of contact (for example, to a single monthly email, or written correspondence only);
- limiting the number and frequency of responses (for example, one substantive reply per week or month);
- requiring correspondence to be limited to a stated word count, or to a concise, human-written summary of the core issue — see Appendix 5 where this relates to AI-generated content; and/or
- declining to respond further to correspondence that only repeats matters already concluded.

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from a Trust school.

4. Vexatious complaints and complainants

Where, despite this policy having been properly and fully followed, a complainant repeatedly tries to reopen a matter that has already been investigated and concluded, or where their conduct amounts to harassment of an individual, the Trust may determine that the complaint, or the complainant, is vexatious. Where this determination is made:

- the Trust will write to the complainant explaining that the internal procedure has been exhausted, that the matter is closed, and why it has reached this view (see the model letter at Section 7 below);
- the Trust may decline to enter into further correspondence about the matters already addressed;
- any genuinely new complaint, raising matters not previously considered, will still be considered under this policy; and

- a decision that a complainant is vexatious does not remove essential safeguarding or welfare communication, and may itself be raised with the DfE if the complainant believes it has been applied unfairly.

5. Duplicate complaints

Where a complaint that has already been resolved is raised again by a different member of the same family, or another individual, on the same substantive issue, the Trust will consider whether there is genuinely new information. If not, the Trust will explain that the matter has already been investigated and concluded, and signpost the DfE if the new complainant remains dissatisfied. If there is new information, the complaint will be considered under this policy.

6. Complaint campaigns

Where the Trust receives a large volume of near-identical complaints from multiple individuals about the same issue, it may treat these as a single campaign, investigate the substance fully, and issue one written response shared with all complainants. Complainants will still have an opportunity to seek a review of that response; because of the numbers involved, this may be managed collectively, with all complainants given a fair opportunity to submit additional information.

7. Model letter: final response and notification of vexatious complainant status

The table below can be inserted into the letter (or sent as an enclosure) to address each point raised.

Point raised	Trust's response
[ ]	[ ]
[ ]	[ ]
[ ]	[ ]

MODEL LETTER — not for direct use without adaptation to the facts and legal advice where appropriate

Private and confidential

[Date]

Dear [name],

Re: [subject of complaint] — final response

Following receipt of your email of [date], the Trust has sought advice to respond in final terms to this communication. This final response takes account of the Complaints Policy adopted by [Name of Trust].

The points you have raised are addressed below (see table). The Trust is content that it has approached this matter in a fair and equitable manner.

The Trust has reasonably determined that you are within the scope of Appendix 4 of our Complaints Policy (Managing Unreasonable, Persistent and Vexatious Complaints and Complainants), and accordingly will not be

entering into any further correspondence about the matters referred to in your recent correspondence.

This does not affect your ability to raise a genuinely new concern, which we would consider under our usual procedure, or to contact the Department for Education if you believe this procedure has not been properly followed. Contact details are set out in our Complaints Policy.

Please also note that if you continue to make remarks about individuals connected with the Trust that we consider to be defamatory, the Trust reserves the right to consider all options available to it to protect those individuals, the Trust and its schools.

Yours sincerely,

[Name]

on behalf of [Trust name / the Board of Directors]

Appendix 5: Managing AI-generated correspondence

This appendix is new: none of the Trust's existing model documents currently provide a dedicated log or a standalone model letter for AI-generated correspondence. It draws together, and builds on, the Trust's existing "Using AI" wording (Section 3.2 and Section 8 above) and its existing unreasonable-communication provisions.

1. Why this appendix exists

The joint DfE/Ofsted/Parentkind guidance (January 2026) and the related ASCL sector briefing (February 2026) recognise that a growing number of complaints are drafted, in whole or in part, using AI tools, and specifically caution parents that AI does not always cite legislation correctly and can make a complaint more complex than it needs to be. The Trust's aim is to keep focus on the substance of a concern — not its authorship — while protecting staff time, accuracy, and a fair process for everyone.

Use of AI is not, in itself, a reason to treat a complaint less seriously, to delay it unfairly, or to refuse to engage. This appendix should always be read together with Sections 3.2 and 8 of the main policy, and, where a pattern of unreasonable contact develops, with Appendix 4.

2. Recognising AI-generated correspondence

Indicators that correspondence may be AI-generated include (this list is a guide only, and no single indicator is conclusive):

- unusually long or formulaic passages quoting statute, statutory guidance or case law, especially where several are quoted together;
- legal citations that are inaccurate, out of date, refer to a different jurisdiction, or do not support the point being made;
- a tone or structure that is generic and does not reflect a personal account of impact on the pupil or family; and
- repeated near-identical passages across separate items of correspondence.

3. What staff should do

- Log the correspondence using the AI-Generated Correspondence Log below (Section 5).
- Read past the AI-generated framing to identify the substantive issue and the outcome sought — this should still be addressed under the normal Stage 1/2/3 process.

Where the length or inaccurate citation genuinely obstructs a clear response, ask the complainant, courteously, to confirm or restate the core issue and the outcome sought in their own words — using the model letter at Section 6 where appropriate — or offer a call or meeting instead.

- Never escalate to Appendix 4 solely because AI has been used — escalate only where the wider pattern of behaviour meets the Appendix 4 criteria (for example, repeated, excessive contact that continues after a request for a summary).
- Always continue to treat any safeguarding disclosure within AI-generated correspondence with the same urgency as any other safeguarding information.

4. Trust-level oversight

The Complaints Co-ordinator (or DPO, where data protection issues also arise) should review the log at least termly, and report anonymised themes — for example, the volume of AI-flagged correspondence, and how it was resolved — to the Local Governing Body and, in aggregate, to the Board of Directors as part of the annual complaints monitoring report (Section 10 of the main policy). The log is retained in line with the Trust's Records Retention Schedule and Data Protection Policy, and is not shared outside the Trust save where required by law or a regulator.

5. AI-generated correspondence log

To be completed by the member of staff or complaints co-ordinator handling the correspondence.

Date	Complaint ref.	Stage	Nature of AI-generated content flagged	Action taken	Staff member	Outcome / follow-up

6. Model letter: response to AI-generated or excessive correspondence

MODEL LETTER — not for direct use without adaptation to the facts

[Date]

Dear [name],

Re: your recent correspondence

Thank you for your emails of [dates] regarding [brief description of the issue]. We want to make sure we properly understand and respond to your concern, and to do that as quickly as possible.

Your recent correspondence is lengthy and includes references to legislation and guidance that appear to have been generated using an AI tool. As you may be aware, the Department for Education, Ofsted and Parentkind have jointly advised parents to use AI "with caution", as it does not always cite the law accurately, and can make a complaint more complicated than it needs to be. We have found some of the legal and policy references in your correspondence to be [inaccurate / taken out of context / not applicable to this matter], and this has made it more difficult for us to identify the specific issue you would like us to address.

To help us respond properly and promptly, we would be grateful if you could reply with a short, plain-English summary (around [200–300] words) covering:

• the specific issue or decision you are unhappy with, with dates;

• what you would like the school to do about it; and

• whether this is new information, or the same matter we have already addressed in our letter of [date].

We are very happy to arrange a short call or meeting with [name/role] instead, if that would be easier.

This request does not affect your right to have your concern considered under our Complaints Policy, and does not restart or reduce the time you have to raise it. We will pause our response timescale until we receive your summary, or until [date], whichever is sooner.

If lengthy, AI-generated correspondence repeating matters we have already addressed continues, we may need to consider this under Appendix 4 of our Complaints Policy (Managing Unreasonable, Persistent and Vexatious Complaints).

Yours sincerely,

[Name and role]

Appendix 6: Data (Use and Access) Act 2025 complaints procedure

1. Introduction

The Trust is committed to protecting the privacy and personal data of its pupils, staff, parents/carers, governors and the wider school community. This procedure outlines the process for handling complaints related to data use and access, in accordance with the Data (Use and Access) Act 2025 (DUAA 2025) and other relevant UK data protection legislation, including UK GDPR and the Data Protection Act 2018.

This is an appendix to the main Complaints Policy and reflects the requirement for standalone data use and access complaints to be handled using a separate procedure. Any complaint linked to other matters, whether raised as a formal or informal complaint, is dealt with under the standard complaint process in the main policy.

2. Roles and responsibilities

The Trust is responsible for ensuring compliance with this policy and its legal obligations under UK GDPR, the Data Protection Act 2018, the DUAA 2025 and other relevant legislation. The Trust will delegate day-to-day management to relevant staff, and will expect staff to investigate a complaint unless there is a conflict of interest, in which case the Trust will appoint a suitable person. The Headteacher and senior leadership team are responsible for ensuring staff are aware of this procedure and their data protection obligations, and all staff are responsible for handling personal data securely and lawfully.

3. Scope

This procedure applies to anyone who has dealings with the Trust and believes their personal data has been used or accessed inappropriately, or that their rights under the DUAA 2025 and other data protection laws have been infringed, including current and former pupils, parents/carers, staff, governors, volunteers, and contractors/suppliers.

4. Principles

- **Fairness and transparency:** all complaints will be handled fairly, impartially and transparently.
- **Confidentiality:** complaints and related information will be treated with the utmost confidentiality, unless disclosure is required by law.
- **Timeliness:** complaints will be acknowledged and investigated promptly.
- **Compliance:** all actions taken will comply with the DUAA 2025, UK GDPR, the DPA 2018 and other relevant legislation.

5. The complaint procedure

Step 1: Informal resolution

Individuals are encouraged first to raise a concern about data use or access with the relevant member of staff or senior person — normally the Headteacher. Many issues can be resolved quickly and informally at this stage.

Step 2: Formal complaint

If the informal approach is unsuccessful or inappropriate, a formal complaint should be submitted in writing, or by email, to the Trust's Data Protection Officer at [insert DPO

email]. The written complaint should include: full name and contact details; a clear and concise description of the complaint, including what happened, when, and who was involved; a description of the data involved and how it was used or accessed inappropriately; any relevant dates, times or evidence; details of any informal steps already taken; and the desired outcome.

Step 3: Acknowledgment and investigation

The complainant will receive an acknowledgment within 5 working days of receipt. The Trust will conduct a thorough and impartial investigation, which may involve interviewing the complainant and relevant staff, reviewing records, logs and policies, and consulting external legal or data protection experts if necessary. The Trust will aim to complete the investigation and provide a substantive response within 20 working days of acknowledgment; if more time is needed, the Trust will explain the reason for the delay and provide a new estimated completion date.

6. Response

The Trust will provide a formal written response setting out: the findings of the investigation; a clear and reasoned conclusion as to whether the DUAA 2025 or other data protection law has been breached; details of any corrective action taken or planned; the outcome of the complaint (upheld, partially upheld, or not upheld); and information on the next steps available if the complainant remains dissatisfied.

7. Escalation

If the complainant is not satisfied with the Trust's final response, they may refer the matter to the Information Commissioner's Office (ICO): [ico.org.uk] (https://ico.org.uk); telephone 0303 123 1113; or Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

8. Review

This procedure will be reviewed annually by the Trust's Data Protection Officer to ensure it remains relevant, effective and compliant with current legislation.

Review Schedule

Policy Author	Chief Executive Officer
Policy Approver	Board of Directors
Current Policy Version	1.6
Policy Effective From	1st September 2026
Policy Review Date	September 2027

Revision Schedule

Version	Revisions	By whom
1.0	Original document produced	CEO
1.1	Review of Document - Updates based on government/DfE guidance	CEO
1.2	Review of Document – Updates based on government/DfE guidance	CEO
1.3	Review of Document – Updates based on government/DfE guidance	CEO
1.4	Review of Document – Updates based on government/DfE guidance. v2 – wording added regarding the Secretary of State/body conducting an inspection requiring access to confidential statements and records.	CEO
1.5	Review of document. Added Data Protection Complaints procedure as Appendix 5. Updated the exceptions table (page 6-8) to include links for admission appeals, statutory assessment concerns, school re-organisation concerns and safeguarding contact information for all local authorities. Amended Next Steps changing ESFA contact to DfE.	CEO
1.6	New policy, incorporating the January 2026 joint DfE/Ofsted/Parentkind guidance and Trust arrangements for AI-generated and vexatious correspondence.	CEO