



Complaints Policy and Procedure

Date: September 2026

Review Date: September 2028

Purpose and Legal Framework

Willow School is committed to dealing with concerns and complaints promptly, fairly and openly and to using them constructively to improve what we do. This policy sets out how anyone with a concern about the school — including parents, carers, pupils, staff, and members of the public — can raise it and how it will be handled.

This policy meets the requirements of **Schedule 1, Part 7 (paragraph 33) of the Education (Independent School Standards) Regulations 2014 (as amended)**, which sets out what an independent school's complaints procedure must provide for, including an informal stage, a formal written stage, and — where a complaint remains unresolved — a panel hearing involving at least one panel member who is independent of the school's management and running. It also reflects **Keeping Children Safe in Education (KCSIE) 2026**, the **Equality Act 2010** and current Department for Education (DfE) best-practice guidance on school complaints.

A Note on Governance

Willow School is an independent school led by its Proprietors rather than a governing board, and is not required to have one. Under the Independent School Standards, the duty to secure and operate an effective complaints procedure sits with the Proprietor. This policy is written on that basis: wherever DfE template guidance or generic complaints models refer to a 'governing body', 'chair of governors' or a 'clerk', the equivalent function at Willow School is carried out as set out below — by the Proprietors, supported by the school's retained HR provider, so that the same standard of independent, impartial scrutiny is achieved without a governing board in place.

Roles and Responsibilities

The following roles are referred to throughout this policy.

Role	Function in this Procedure
Headteacher & Proprietor Rebecca Miller	Receives and investigates Stage 1 formal complaints, except where the complaint is about her.
Proprietor James Mackay	Conducts Stage 1 where the complaint concerns the Headteacher, carries out the Stage 2 review, and, with the Headteacher, convenes the Stage 3 panel and appoints its independent member/s.
HR Provider Jennetts HR Solutions	Engaged on an advisory, as-needed basis only, not involved in the day-to-day management or running of the school, which is what allows a consultant from this provider to act as the independent panel member. Supplies a consultant to sit as the independent panel member at Stage 3 and, where both Proprietors are conflicted, an independent investigator and/or a wholly independent panel. Any consultant involved must have had no prior involvement in the matter complained of.
Complaints Co-ordinator Olivia Pearson	Logs complaints, tracks timescales, arranges panel hearings, and maintains the complaints record described in section: Record keeping, confidentiality and reporting.
Designated Safeguarding Lead (DSL) / Deputy DSL Melanie Hemming, Rebecca Miller & Gemma McNeil	Receives any safeguarding element of a complaint in parallel with the complaints process — see below. If relating to a staff member, the complaint must come to Rebecca Miller.

The Difference Between a Concern and a Complaint

A concern is an expression of worry or doubt for which reassurance is sought. A complaint is an expression of dissatisfaction, however made, about action taken or a lack of action.

Most issues are resolved quickly and informally and Willow School encourages this wherever possible. If you would rather not raise a concern with a particular member of staff, or that staff member does not feel able to deal with it objectively, the Headteacher will direct you to someone else — this does not need to be a more senior member of staff, simply someone able to consider the matter fairly.

How to Raise a Concern or Make a Complaint

A concern or complaint can be raised in person, in writing or by telephone, and may be raised by a third party with the complainant's consent. A concern should be raised with the class teacher or headteacher in the first instance. If it is not resolved informally, the next step is a formal complaint under Stage 1 below.

Complainants should not raise concerns or complaints directly with individual proprietors or with prospective panel members outside the stages set out below — this protects everyone's ability to consider the complaint fairly if it is later escalated.

A complaint form is provided in Appendix A. Support with completing it is available from the school office, or from an independent third party such as Citizens Advice. In line with the Equality Act 2010, we will make reasonable adjustments to this procedure where needed, for example, providing information in alternative formats, helping a complainant put a complaint in writing or holding meetings in an accessible location.

Anonymous Complaints

Anonymous complaints are not normally investigated. The headteacher, or a proprietor where appropriate, will decide whether an anonymous complaint nonetheless warrants investigation — for example, where it raises a safeguarding concern.

Timescales

A complaint should be raised within three months of the event complained of, or of the last event in a series. Complaints made outside this window will still be considered where there are exceptional circumstances. A complaint received outside term time is treated as received on the first school day after the holiday period.

Where a Complaint Relates to Safeguarding

This complaints procedure is not a substitute for the school's safeguarding arrangements. Wherever a concern or complaint discloses, or may disclose, a safeguarding issue, the person receiving it will refer that element immediately to the DSL (or, where the concern involves the DSL or staff member, to the headteacher) in line with the Child Protection and Safeguarding Policy and KCSIE 2026 — in parallel with, and without waiting for, any complaints process.

Allegations that a member of staff (including the headteacher) has behaved in a way that has harmed, or may have harmed, a child, possibly committed a criminal offence against a child or behaved in a way that indicates unsuitability to work with children, are handled under the school's allegations management procedure and reported to the Local Authority Designated Officer (LADO), not under this complaints policy. Where such an allegation is about the headteacher, the report to the LADO is made by the other proprietor.

Lincolnshire LADO	01522 554674 LSCP_LADO@lincolnshire.gov.uk
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Complaints about staff conduct that do not meet this threshold are dealt with under the school's disciplinary procedure rather than this policy. The complainant will be told that the matter is being addressed but will not be given details of any outcome.

Scope of this Procedure and Alternative Routes

This procedure covers complaints about any provision of facilities or services by Willow School. Some matters are handled under separate, statutory routes:

Matter	Route
Statutory assessment of SEN, EHCP content or admissions decisions made by the local authority	Raised with Lincolnshire County Council SEND or Placement Team or where appropriate, the child's caseworker.
Safeguarding / child protection matters meeting the allegations threshold	Handled under the Child Protection and Safeguarding Policy and reported to the LADO — see above.
Exclusion of a pupil	Complaints about how the Behaviour Policy was applied can be raised through this procedure. Wider exclusion guidance is at gov.uk/school-discipline-exclusions/exclusions .
Whistleblowing (staff, including temporary staff and contractors)	Raised under the Whistle-Blowing Policy. Staff who do not wish to raise a matter with the school directly can contact the NSPCC Whistleblowing Advice Line — 0800 028 0285, help@nspcc.org.uk — or the Secretary of State for Education (gov.uk/contact-dfe).
Staff grievances and staff conduct	Dealt with under the Grievance Policy or Disciplinary Policy as appropriate, not this procedure.
Services provided by other organisations using school premises	Raised with that provider under their own complaints procedure.

If another body, such as the police, a local authority safeguarding team, or a tribunal — is investigating an aspect of the complaint, this may affect the timescales below or mean the procedure is paused until that investigation concludes. The same applies where a complainant begins legal proceedings connected to their complaint.

Resolving or Withdrawing a Complaint

At every stage, Willow School aims to resolve the complaint. Where a complaint is upheld in whole or in part, we may offer an explanation, an acknowledgement that something could have been handled better, an assurance about future practice, a timescale for any changes, a policy review, and/or an apology, as appropriate. A complainant who wishes to withdraw a complaint should confirm this in writing.

Stages of the Procedure

There are three formal stages, preceded by the informal approach described above. Which route a complaint takes at Stage 1 and Stage 2 depends on who it is about and is set out below.

Stage 1: Formal Complaint

Complaint concerns...	Stage 1 is handled by...
A member of staff or the school generally	The Headteacher
The Headteacher	The second Proprietor
The second Proprietor (in their proprietorial role)	The Headteacher
Both Proprietors or where the Proprietors judge a close personal or working relationship between them prevents an impartial Stage 1	An independent investigator commissioned by the Proprietors through the retained HR provider (or another appropriate independent source)

A formal complaint should be made in writing (Appendix A can be used) to the school office, marked private and confidential. Receipt is acknowledged in writing within 5 school days, the acknowledgement will clarify what remains unresolved and what outcome the complainant is looking for and may propose a meeting.

The investigation may be delegated to another senior leader, but the decision may not be. A full written response is provided within 15 school days of receipt, explaining what was investigated, the decision reached and why, any action the school will take and how to escalate to Stage 2 if the complainant remains dissatisfied. Where 15 days cannot be met, the complainant is given a revised date and kept updated.

Stage 2: Review

A complainant who remains dissatisfied can ask, within 10 school days of the Stage 1 response, for the matter to be reviewed. This request is acknowledged within 5 school days.

Stage 1 was handled by...	Stage 2 review is carried out by...
The Headteacher	The second Proprietor
The second Proprietor	The Headteacher
An independent investigator (both Proprietors conflicted)	Stage 2 is not held separately, the complaint proceeds directly to a wholly independent Stage 3 panel

The reviewer considers all the evidence gathered at Stage 1 and can uphold, vary, or overturn the Stage 1 outcome. They write to the complainant and the Headteacher within 15 school days of the Stage 2 request, explaining the decision and reasons and how to escalate to the Stage 3 panel if the complainant remains dissatisfied. This is the last stage before a formal panel hearing.

Stage 3: Panel Hearing

A complainant who remains dissatisfied after Stage 2 can ask, within 10 school days, for the complaint to be heard by a panel. This is the formal panel hearing required by the Independent School

Standards: it consists of at least three people who have had no prior involvement in the complaint, at least one of whom is independent of the management and running of the school.

Complaint concerns...	Panel is convened by / composed of...
A member of staff or the school generally	Convened by the Proprietors. Panel: whichever Proprietor has not previously been involved, plus two people sourced through the retained HR provider, at least one of whom is independent of the school's management and running.
The Headteacher or a Proprietor	Convened by the uninvolved Proprietor. Panel: that Proprietor plus two people sourced through the retained HR provider, at least one of whom is independent of the school's management and running.
Both Proprietors, or where neither can be impartial	A wholly independent panel of three, none of whom has any connection to Willow School, sourced through the retained HR provider or another appropriate independent body.

An independent panel member must never have been a member of the school's leadership team or a member of staff or supply staff at Willow School and must have had no prior involvement in the matter. The school's retained HR provider is engaged only for advice and as staffing issues arise, it has no day-to-day management role at Willow School, which is what allows its consultants to satisfy the 'independent of management and running of the school' test. Where the specific consultant who would otherwise sit on the panel has personally advised on the matter complained of, a different consultant from that provider, or a source entirely outside it, is used instead, so that independence is not open to challenge.

At least 10 school days before the hearing, the complaints co-ordinator confirms the date, time and venue and requests any further written evidence at least 5 school days beforehand. All written material is circulated to both parties at least 3 school days before the hearing. The panel does not consider new complaints unrelated to the original one (these are raised afresh at Stage 1) and does not normally accept covert recordings as evidence.

The complainant may attend and bring a companion for support. Legal representation is not encouraged but may be appropriate in limited circumstances. The panel can uphold or dismiss the complaint, in whole or in part and where it is upheld can decide what action should follow and recommend changes to school systems or procedures. The panel chair (elected by the panel at the outset) writes to the complainant and the school within 5 school days with the decision, the reasons for it, and, where the complaint is not fully resolved, how to take the matter to the DfE. This is the final internal stage of the procedure.

If the Complaint Remains Unresolved

Once Stage 3 is complete, a complainant who believes Willow School has not followed its published procedure, or has acted unlawfully or unreasonably, can refer the matter to the Department for Education. The DfE does not re-investigate the substance of a complaint or overturn the school's decision, but considers whether the school has met the Independent School Standards and can act accordingly.

Record keeping, Confidentiality and Reporting

The complaints co-ordinator keeps a written record of every formal complaint, including its nature, the stage/s it reached, the outcome and copies of correspondence and meeting notes. Records are kept confidential and are seen only by those investigating the complaint or sitting on a panel, except where the Secretary of State, the complainant (via a subject access request) or an inspector needs access, or where disclosure is required by law. Records are retained only as long as necessary, in line with the Data Protection Policy and UK GDPR.

In line with paragraph 33 of Schedule 1 to the Independent School Standards, Willow School will make available to parents, on request, the number of formal complaints registered under this procedure during the preceding school year (including a nil return). The complaints co-ordinator is responsible for compiling this figure each September.

Appendix A: Complaint Form

Please complete and return to the Headteacher via the school office (or, where the complaint concerns the Headteacher, to the Proprietor). Receipt will be acknowledged and next steps explained.

Your name	
Pupil's name (if relevant)	
Your relationship to the pupil (if relevant)	
Address / postcode	
Daytime telephone	
Evening telephone	
Details of your complaint, including whether you have already spoken to anyone at the school about it	
What outcome would you like to see?	
Are you attaching any paperwork? Please give details.	
Signature / date	

Official Use

Date acknowledgement sent	
Sent by	
Complaint referred to	
Date	

Appendix B: Complaints log

A copy of this log is completed for each formal complaint and kept with the complaints record described above.

Informal stage

Date concern received:	Received by (name):	Method received (in person / phone / email / letter):
Nature of concern:		
Date of discussion:	Outcome and any recommendations:	
Resolved? (Y/N)	If not, reasons and next step:	

Stage 1: Formal complaint

Date complaint received:	Handled by (Headteacher / second Proprietor / independent investigator):	Date acknowledgement sent:
Nature of complaint:		
Date of investigation meeting(s):	Outcome (findings and decision):	
Date written response sent:	Resolved? (Y/N)	If not, escalation requested? (Y/N and date)

Stage 2: Review

Date review requested:	Reviewed by:	Date acknowledgement sent:
Outcome of review (including reasons):		
Date written response sent:	Resolved? (Y/N)	If not, escalation requested? (Y/N and date)

Stage 3: Panel hearing

Date panel hearing requested:	Date acknowledgement sent:	Date of hearing:
Panel members (name and, for the independent member, source/organisation):		
Outcome of hearing (decision, reasons, and any recommendations):		
Date outcome letter sent:	Resolved? (Y/N)	Next steps (e.g. referral to DfE):