ST BENEDICT'S SCHOOL
a minimis incipe

St Bernard's Preparatory School

Group Complaints Policy

Authorised by:	The Board of Governors of St Benedict's School
Date:	November 2026
Review Date:	November 2027
Circulation:	Governors, all staff and volunteers, parents via the schools' websites
Status:	Draft for approval

Contents Page

1. Introduction 3
2. Circulation 3
3. Policy Status 3
4. Application 3
5. Timescales 4
6. Stages 5
7. Stage 1: Informal – Concerns and Difficulties 5
8. Stage 2: Formal Complaint 5
9. Stage 3: Reference to the Complaints Panel 6
10. Vexatious or Serial/Persistent Complaints 9
11. Confidentiality and Records 10
12. Review 11

1. Introduction

1.1 This is a regulatory policy. Responsibility for monitoring its effectiveness, compliance and implementation lies with the Board of Governors. This includes monitoring the operation of the policy, reviewing its effectiveness, identifying patterns in complaints, evaluating their nature and outcomes, and modifying practice where appropriate.

1.2 The School is committed to dealing with complaints fairly, sensitively and promptly, and to resolving concerns informally wherever possible.

2. Circulation

2.1 This policy applies across the schools within the St Benedict's Group:

- St Benedict's Senior School
- St Benedict's Junior School
- St Bernard's Preparatory School

It is addressed to all staff and parents and is published on each school's website.

2.2 This policy can be made available in large print or another accessible format if required. Parents who need assistance in making a complaint, for example because of a disability, should contact the relevant school office, which will make appropriate arrangements.

3. Policy Status

3.1 This policy has been approved by the Board of Governors of St Benedict's School and applies to the three schools within the Group. References to 'the School' in this policy mean the relevant school within the Group, unless the context indicates otherwise.

3.2 The policy takes account of Part 7 of the Education (Independent School Standards) Regulations 2014, the Early Years Foundation Stage statutory framework (September 2026) and the Department for Education's Independent School Standards Guidance (April 2026).

3.3 The procedures set out below may be adapted where appropriate to the circumstances of an individual complaint, provided that the statutory requirements and the rights of parents under this policy are preserved. Certain procedures may need to take place during term time, particularly where teaching staff are required to participate in an investigation or hearing.

4. Application

4.1 This policy applies to complaints made by parents of students attending the School. For these purposes, 'parent' includes any person with parental responsibility for, or care of, the student concerned.

4.2 Where a complaint is initiated while a student is registered at the School, it may continue under this procedure after the student has left. The School may also, at its discretion, consider complaints first raised after a student has left.

4.3 Child Protection

4.3.1 Separate procedures apply to safeguarding and child protection concerns, which will be dealt with in accordance with the relevant school's Safeguarding and Child Protection Policy.

4.3.2 Where a complaint raises safeguarding concerns alongside other matters, the safeguarding concerns will be referred promptly to the Designated Safeguarding Lead and considered under the appropriate procedures. Other aspects of the complaint may continue to be addressed under this policy.

4.4 Decisions to Exclude or Require the Removal of a Student

4.4.1 This policy does not apply to decisions by the Head to exclude or require the removal of a student. Parents seeking a review of such a decision should refer to the Governors' Review Procedure.

4.5 Early Years Foundation Stage

4.5.1 Complaints concerning the fulfilment of EYFS requirements will be considered under this policy, subject to the specific statutory timescales set out in Section 11.2.

4.5.2 Parents may also raise concerns regarding EYFS compliance with the appropriate regulatory body.

4.6 Admissions

4.6.1 The statutory complaints procedure applies to parents of students attending the School. Complaints from parents of prospective students concerning admissions or entrance procedures are therefore outside its scope, although the School will seek to consider and respond to such concerns fairly.

4.7 Data Protection and Subject Access Requests

4.7.1 Anyone may raise a complaint concerning data protection or the handling of a Subject Access Request. Such complaints should be addressed to bursar@stbenedicts.org.uk.

4.7.2 The School will consider complaints promptly and impartially, in accordance with applicable data protection legislation.

4.7.3 Where section 164A of the Data Protection Act 2018 applies, the School will acknowledge a complaint within 30 calendar days of receipt, investigate it without undue delay and communicate the outcome promptly. The School will aim to provide a substantive response within 30 calendar days wherever reasonably practicable.

4.7.4 Complainants who remain dissatisfied may refer their concerns to the Information Commissioner's Office (ICO).

5. Timescales

5.1 Complaints should ordinarily be raised within three months of the incident concerned, or, where a series of associated incidents has occurred, within three months of the last incident. Complaints raised outside this period will be considered where there is a reasonable explanation for the delay.

5.2 The School aims to resolve all complaints promptly and, wherever reasonably practicable, within a school term. The timescales applicable to each stage are set out below.

5.3 Where it is not reasonably practicable to meet a stated timescale, the School will inform the complainant of the reasons and provide a revised date. Any extension will be reasonable and proportionate to the circumstances.

5.4 'Working days' means Monday to Friday during published school term dates, excluding bank holidays and school holidays. Complaints received during school holidays will normally be considered from the first working day of the following term, although urgent matters, particularly those concerning safeguarding or student welfare, will be addressed as appropriate.

5.5 The statutory 28-calendar-day requirement for written complaints concerning EYFS provision is unaffected by school holidays.

5.6 Any complaint concerning the immediate safety or welfare of a student should be raised without delay with the member of staff best placed to take urgent action and confirmed in writing to the relevant Head.

6. Stages

6.1 This policy establishes a three-stage complaints procedure:

- **Stage 1:** Informal resolution of concerns or difficulties raised orally or in writing with an appropriate member of staff.
- **Stage 2:** A formal complaint submitted in writing to the Head of the relevant school.
- **Stage 3:** A hearing before a Complaints Panel appointed on behalf of the Board of Governors.

7. Stage 1: Informal – Concerns and Difficulties

7.1 Most concerns can and should be resolved informally. Parents are encouraged to raise concerns promptly with the member of staff best placed to address them. These may concern teaching, pastoral care, disciplinary matters, timetabling, school systems, facilities or financial matters.

7.2 Concerns should normally be raised initially as follows:

- **Educational matters:** with the relevant teacher or, where appropriate, a senior leader.
- **Pastoral matters:** with the relevant pastoral lead or senior leader.
- **Disciplinary matters:** with the member of staff concerned or an appropriate senior leader.
- **Financial matters:** in writing to the Bursar or equivalent.

7.3 The School will normally acknowledge a concern within two working days during term time. A concern raised orally will not necessarily be acknowledged in writing.

7.4 The School will seek to resolve informal concerns within five working days wherever reasonably practicable.

7.5 If a concern cannot be resolved informally, or if the matter is sufficiently serious to warrant formal investigation, the parent may proceed to Stage 2.

8. Stage 2: Formal Complaint

8.1 A formal complaint should be submitted in writing, with relevant details and supporting documents, to the Head of the relevant school. The complainant should explain the nature of the complaint, any steps

already taken to resolve it, and the outcome sought.

8.2 If the complaint concerns the Head of the relevant school, it should be addressed to the Chair of Governors of St Benedict's School, via the school office.

8.3 If the complaint concerns the Chair of Governors, it should be addressed to the Clerk to the Governors, who will arrange for it to be considered by an appropriate governor who has not previously been involved in the matter.

8.4 The complaint will be acknowledged within two working days during term time, indicating the action being taken and the anticipated timescale.

8.5 The Head, or the Chair of Governors where the complaint concerns the Head, may investigate the complaint personally or appoint an appropriate person to do so.

8.6 The Chair of Governors may also appoint an external investigator where this is considered appropriate, having regard to the nature, seriousness or complexity of the complaint, or where an independent investigation would be beneficial in ensuring a fair and impartial process.

8.7 An investigator may request further information, meet with the complainant and speak to staff, students or others with relevant knowledge of the circumstances. Written records will be maintained of meetings and interviews conducted as part of the investigation.

8.8 A written outcome, including the reasons for the decision, will normally be provided within ten working days of receiving the formal complaint.

8.9 Where the investigation cannot reasonably be completed within this period, the complainant will be informed of the reasons and given a revised date. Where an investigation concludes during school holidays, the School will respond as soon as reasonably practicable.

8.10 Regardless of the outcome, the School will consider whether any changes to systems, practices or procedures are appropriate.

8.11 The written outcome will explain the complainant's right to request consideration of the complaint at Stage 3.

9. Stage 3: Reference to the Complaints Panel

9.1 Referral to the Complaints Panel

9.1.1 If a parent remains dissatisfied with the School's response to their formal complaint at Stage 2, they may request that the complaint be considered by a Complaints Panel appointed on behalf of the Board of Governors.

9.1.2 The Panel provides an opportunity for the complaint to be considered by people who have not previously been directly involved in the matter, including at least one person independent of the management and running of the School.

9.2 Role and Scope of the Panel

9.2.1 The purpose of the Panel hearing is to undertake a substantive review of the complaint, the investigation conducted at Stage 2 and the conclusions reached, and to determine whether those

conclusions were reasonable in all the circumstances.

9.2.2 The Panel will consider the merits of the complaint, rather than merely checking whether the correct procedures were followed. It will reach its findings on the balance of probabilities, having regard to the evidence available.

9.2.3 The hearing will not ordinarily be a complete reinvestigation of the complaint, and the Panel will normally consider the matters raised and investigated at Stages 1 and 2.

9.2.4 New areas of complaint will not normally be considered at Stage 3. However, the Panel may admit additional relevant evidence where it considers this necessary to ensure a fair and reasonable review.

9.2.5 The Panel may make findings and recommendations concerning the complaint and any changes to School practice which it considers appropriate.

9.3 Notification

9.3.1 A request for a Stage 3 hearing must be submitted in writing to the Chair of Governors of St Benedict's School within ten working days of receipt of the Stage 2 decision.

9.3.2 Requests received after this deadline will be considered where the parent provides a reasonable explanation for the delay.

9.3.3 The request should set out the grounds on which the parent remains dissatisfied, the outcome sought, and any relevant documents which the parent wishes the Panel to consider. The parent should also identify any relevant documents held by the School which they wish the Panel to see.

9.3.4 The Chair of Governors, or Clerk to the Governors acting on the Chair's behalf, will acknowledge the request in writing within three working days during term time.

9.4 Composition

9.4.1 The Complaints Panel will comprise at least three people appointed by or on behalf of the Board of Governors, none of whom shall have been directly involved in the matters giving rise to the complaint.

9.4.2 At least one member shall be independent of the management and running of the School. The independent member must not be a member of the governing body, an employee of the School or someone otherwise closely involved in its management.

9.4.3 Where the Chair of Governors has been directly involved in the complaint, responsibility for appointing the Panel will be delegated to another governor who has not previously been involved.

9.5 Convening the Panel

9.5.1 The Chair of Governors, or Clerk to the Governors acting on the Chair's behalf, will make the necessary arrangements for the Panel hearing and inform the parent of the composition of the Panel.

9.5.2 The Panel will normally be convened within twenty working days of receipt of the parent's request for a hearing.

9.5.3 Where this is not reasonably practicable, the School will explain the circumstances and provide a revised date.

9.6 Notice of Hearing

9.6.1 The parent will be given reasonable written notice of the date, time and place of the hearing, together with the names of the Panel members and relevant documentation to be considered.

9.6.2 The School will endeavour to circulate the documents sufficiently in advance to allow all parties a reasonable opportunity to consider them.

9.7 Attendance and Representation

9.7.1 Parents are entitled to attend the hearing and may be accompanied by another person, such as a relative or friend.

9.7.2 The hearing is not a legal proceeding, and legal representation is not normally necessary. Where a parent is accompanied by a legally qualified person, that person will ordinarily attend in a supportive capacity rather than acting as an advocate, although the Panel may permit representations where it considers this appropriate in the interests of fairness.

9.7.3 Where appropriate, the Panel may arrange for the hearing to take place remotely, provided that the parent has a fair opportunity to participate.

9.7.4 Where a parent chooses not to attend, having been given a reasonable opportunity to do so, the Panel may proceed in their absence and reach its findings on the evidence available.

9.8 Chair of the Panel and Conduct of the Hearing

9.8.1 The Panel will appoint one of its members to chair the hearing.

9.8.2 The hearing will be conducted fairly, respectfully and without unnecessary formality. The Chair will ensure that the parent and other relevant parties have a reasonable opportunity to present their views, answer questions and comment on the matters under consideration.

9.8.3 The Panel may hear oral evidence from witnesses, request written statements or seek clarification of relevant matters, as it considers appropriate.

9.8.4 All those attending are expected to demonstrate courtesy, restraint and good manners.

9.8.5 Where conduct becomes unreasonable or disruptive, the Chair may issue a warning, adjourn the hearing or make other proportionate arrangements to enable the complaint to be considered fairly.

9.8.6 If it becomes necessary to terminate a hearing, the Panel may continue its consideration on the basis of the available evidence, provided that reasonable steps have been taken to ensure that the parent has had an opportunity to participate. Termination of a hearing will not automatically result in the original decision being upheld.

9.8.7 Any objection concerning the conduct of the hearing should be raised with the Chair as soon as reasonably practicable and will be recorded.

9.9 Adjournment

9.9.1 The Chair of the Panel may adjourn the hearing where further investigation, additional evidence or legal advice is considered necessary.

9.9.2 The parent will be informed of the reasons for the adjournment and the arrangements for reconvening or concluding the hearing.

9.10 Private Proceedings

9.10.1 A hearing before the Complaints Panel is a private proceeding. All participants are expected to respect the confidentiality of the matters discussed, subject to any applicable legal obligations or rights.

9.10.2 Information concerning the proceedings must not be disclosed improperly to third parties or the media.

9.11 Findings and Recommendations

9.11.1 After considering the evidence, the Panel will determine whether to:

- Dismiss the complaint, in whole or in part;
- Uphold the complaint, in whole or in part; and/or
- Make recommendations to the Head and/or Board of Governors, as appropriate.

9.11.2 The Panel may make recommendations concerning School practices, procedures or other matters arising from the complaint, but it does not have authority to make financial awards or impose disciplinary sanctions.

9.11.3 The Panel's written findings, reasons and any recommendations will normally be issued within ten working days of the hearing.

9.11.4 A copy of the findings and recommendations will be provided to the complainant and, where relevant, to the person complained about. They will also be made available for inspection on the School premises by the proprietor and the Head, in accordance with the Independent School Standards.

9.11.5 The Panel's findings will mark the conclusion of the School's complaints procedure. The Head and/or Board of Governors will consider any recommendations and determine what further action, if any, should be taken.

9.12 Withdrawal or Discontinuance by a Complainant

9.12.1 If a parent withdraws a complaint or indicates that they are satisfied and do not wish to proceed, the School may nevertheless, at its discretion, refer the matter to a Panel or continue with an already convened Panel where it considers this appropriate.

9.12.2 This may be necessary in order to bring the matter to a clear conclusion, make findings or recommendations which may inform School practice, or address safeguarding, welfare, regulatory or wider community concerns.

9.12.3 Where the School decides to proceed, the parent will be informed and given the opportunity to attend and be accompanied at any Panel hearing. If the parent chooses not to attend, the Panel may proceed in their absence and issue findings and, where appropriate, recommendations.

10. Vexatious or Serial/Persistent Complaints

10.1 The School is committed to considering all genuine complaints fairly and in accordance with this procedure.

10.2 Where correspondence or conduct becomes unreasonable, repetitive or vexatious, the School may take proportionate steps to manage communications, including limiting their frequency, requiring communications to be made in writing or identifying a single point of contact.

10.3 Any such measures will be considered carefully, taking account of the individual circumstances and any reasonable adjustments which may be required. The complainant will be informed of the arrangements and the reasons for them.

10.4 These measures will not remove a parent's entitlement to the complaint's procedure required by the Independent School Standards.

10.5 Where a complaint has already completed all three stages of the procedure, the School may decline to reopen the same matter unless significant new information has emerged which, in the School's judgement, justifies further consideration.

11. Confidentiality and Records

11.1 Confidentiality and Complaints Records

11.1.1 Correspondence, statements and records relating to individual complaints will be kept confidential, except where disclosure is required by law, by the Secretary of State or in the course of an inspection conducted under section 109 of the Education and Skills Act 2008.

11.1.2 The School will maintain a written record of all formal complaints received under Stage 2, recording:

- The nature and date of the complaint;
- Whether it was resolved at Stage 2 or proceeded to a Stage 3 Panel hearing;
- The outcome of the complaint;
- Any action taken by the School as a result, whether or not the complaint was upheld.

11.1.3 Records will be retained securely and in accordance with the School's data protection and records retention arrangements.

11.1.4 The number of complaints registered under the formal procedure during the preceding school year will be made available to parents and prospective parents, in accordance with the Independent School Standards.

11.1.5 The Board of Governors will receive appropriate information about the number, nature and outcomes of complaints, to enable it to monitor the effectiveness of the procedure and identify any necessary improvements.

11.2 EYFS Complaints

11.2.1 Where a school has EYFS provision, written complaints concerning the fulfilment of EYFS requirements will be investigated and the complainant notified of the outcome within **28 calendar days** of receiving the complaint.

11.2.2 This statutory deadline applies irrespective of school holidays.

11.2.3 A written record of such complaints will be maintained and made available to the relevant regulatory or inspection body on request, as required.

11.3 External Regulatory Bodies

11.3.1 Parents who believe that the School is not meeting its statutory or regulatory obligations may contact the relevant regulatory body.

11.3.2 The Independent Schools Inspectorate (ISI) is responsible for inspecting independent schools against the Independent School Standards. The Department for Education is responsible for regulating independent schools in England. Ofsted has regulatory responsibilities for certain early years provision.

11.3.3 These bodies do not ordinarily act as an additional stage of the School's complaints procedure or determine individual disputes between parents and the School.

11.3.4 Contact details for the relevant bodies are provided below.

Independent Schools Inspectorate (ISI)
www.isi.net

Department for Education (DfE)
www.gov.uk/government/organisations/department-for-education

Ofsted
www.gov.uk/government/organisations/ofsted

Information Commissioner's Office (ICO)
www.ico.org.uk

12. Review

12.1 This policy will be reviewed annually by the Board of Governors, or sooner where changes in legislation, regulatory guidance or School practice make this necessary.