

Complaints Policy

Policy Control Page

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Royal Deaf Education Trust is a registered Charity. The Deaf Academy (School and College), Rolle House Children's Home and Fearnside House Post 19 centre are part of the Royal Deaf Education Trust Charity but are managed as separate 'operating divisions'. They share a range of services run centrally by the Charity such as Fundraising and Marketing, Human Resources, Finance, Information Technology and Facilities Management.

1. Rationale and Purpose

The Royal Deaf Education Trust is committed to maintaining positive relationships with children, young people, families, staff, commissioners and the wider community. We recognise that concerns and complaints can provide valuable opportunities for reflection, improvement and learning.

As a specialist charitable organisation supporting Deaf children and young people, including many with additional and complex needs, we are committed to ensuring that our complaints process is:

- Fair and impartial
- Accessible and inclusive
- Proportionate
- Timely
- Respectful
- Focused on resolution wherever possible

2. Accessibility

As a Deaf specialist organisation, accessibility is central to this policy. We will make reasonable adjustments where required, including British Sign Language (BSL) interpretation, accessible formats and support with understanding procedures.

3. Scope

This section sets out who this policy applies to and the matters that fall within, or outside, this complaints procedure.

This policy applies to:

- Parents and carers
- Former staff
- External professionals, regulators or commissioners
- Members of the public

It does **not** replace statutory processes, including:

- Safeguarding
- Whistleblowing
- Staff disciplinary
- Grievance procedure
- SEND tribunals
- Data Protection complaints (dealt with under the separate Data Protection Complaints Policy available at [Policies - the Deaf Academy](#))

Depending on the nature of the complaint this may trigger a whistleblowing concern, allegation against staff, safeguarding concern, grievance procedure which are dealt with under separate policies.

Where another procedure is more appropriate, the Academy may redirect the matter accordingly.

To support fair and proportionate investigation, complaints should normally be raised as soon as possible and within **3 months** of the incident.

The Academy may consider complaints outside of this timeframe where there are reasonable grounds for the delay and where a fair investigation remains possible.

Anonymous complaints will not normally be investigated unless there are exceptional circumstances, such as where there is sufficient information to enable a fair investigation or where safeguarding concerns may be present.

4. Definitions

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'.

Academy working days are days when the Academy is open to students, excluding weekends and official closure periods.

5. Key Principles

We will:

- Listen respectfully and take all complaints and concerns seriously
- Seek early and informal resolution wherever possible
- Ensure accessibility (including communication support where appropriate)
- Investigate substantive complaints and concerns fairly and proportionately
- Focus on substantive issues rather than volume of correspondence
- Protect staff wellbeing and organisational capacity

6. Use of Artificial Intelligence (AI) and External Support in assisting with a complaint

The Academy recognises that individuals may seek support when preparing complaints, including support from advocacy services, legal representatives, family members, unions or artificial intelligence (AI) tools. The use of such support does not invalidate a complaint.

However, the Academy also has a responsibility to ensure that complaints processes remain manageable, proportionate and focused on substantive issues so that resources can continue to be directed primarily toward the education, care, wellbeing and support of the children and young people.

Our policy position on AI Assisted complaints:

To ensure fairness and manageability, complaints generated using help from AI must remain:

- Clear
- Relevant and focused on key issues
- Proportionate in length and content

We will respond to the substance of the complaint, not every sentence or repeated point. Highly repetitive, adversarial or excessively detailed submissions (including AI assisted content) may be summarised and addressed collectively.

We may:

- Request clarification of key issues
- Limit responses to core themes
- Prioritise meetings over written exchanges to resolve matters

7. Stages of the Complaints Procedure

The stages below set out how complaints will normally be handled, with the Academy seeking to resolve matters at the earliest appropriate stage wherever possible.

Stage 1 – Informal (Clarification Stage)

The Academy encourages concerns to be addressed informally and relationally wherever appropriate.

In many cases, concerns can be resolved quickly through:

- Discussion

- Clarification
- Meetings
- Restorative conversations
- Agreed actions

Individuals are encouraged, where appropriate, to raise concerns initially with:

- Relevant class teacher
- Residential lead
- Line manager
- Appropriate middle or senior leader

Most issues should be resolved within **15 Academy working days** where possible and a formal written response is not always required.

The Academy may request an initial meeting before accepting a formal complaint where this is considered a reasonable and appropriate route toward resolution.

Stage 2 – Formal Complaint

Where concerns remain unresolved, a formal complaint may be raised by completing and submitting the complaint form (Appendix A). To support fair and proportionate handling, complaints should normally include:

- A clear summary of the concern
- Relevant dates and individuals involved
- The impact of the issue
- The outcome being sought
- Any relevant supporting evidence

In the first instance we will attempt to deal with this informally via a meeting. Where a meeting is arranged, the complainant may be accompanied by a friend, relative, advocate or interpreter. Legal representation will not be permitted as the complaints process is not intended to be a legal process. The Academy reserves the right to decline a proposed companion where there is a clear conflict of interest or where their presence may impact the fairness or effectiveness of the process.

If the complaint cannot be resolved by this first meeting, we will move to a more formal stage where an investigating officer will be appointed.

Investigations will be conducted fairly and proportionately by an appropriate person appointed by the Academy.

We will:

- Consider relevant evidence
- Speak with relevant individuals where appropriate
- Review policies, records, and timelines
- Seek to establish facts reasonably and proportionately

Our responses will normally:

- Summarise the issues investigated
- Provide findings

- Identify any actions arising
- Explain next steps where applicable

We aim for a timescale for a written response within **10–15 Academy working days** wherever reasonably possible, although complex matters may require longer.

Stage 3 – Review/Governance Stage

Where a complainant remains dissatisfied following Stage 2, they may request a review from the Chair of Governors/Trustees.

The purpose of a review is normally to consider:

- Whether the policy and procedure were followed appropriately
- Whether the investigation was reasonable and proportionate
- Whether the response addressed the substantive issues raised

A review is not normally a full reinvestigation of the entire complaint. The Charity may refuse requests that seek simply to repeat previously addressed concerns without materially new evidence or information.

We aim for a timescale for a written response within **20 Academy working days** wherever reasonably possible, although complex matters may require longer.

Stage 4 – Independent Review

Where a complainant remains dissatisfied following Stage 3, they may request an independent review where an independent reviewer will be appointed who has had no prior involvement in the complaint. The purpose of this stage is to provide an objective and impartial review of the complaint and the way in which it has been handled. As part of this stage, the independent reviewer may determine that a hearing is required.

The independent reviewer may:

- Review documentation provided by both the complainant and the Academy
- decide whether to hear from witnesses or rely on written evidence only
- Permit both parties to ask and respond to questions during any hearing

Following the review, or any hearing held, the independent reviewer will issue a final written decision, normally within **10-20 Academy working days**. The final decision will usually be shared with the complainant, the Chair of Governors, Chair of Trustees, the Principal/CEO and any other relevant parties involved.

Stage 5 – External Escalation

If, after completing the Academy's complaints procedure, the complainant remains dissatisfied, they may refer the complaint to the Department for Education (DfE). The DfE will not overturn the Academy's decision but will review whether the complaint was handled in line with the Academy's procedure, funding agreement and legal obligations. Where concerns are identified, the DfE may require the Academy to re-investigate the complaint or amend its procedures accordingly.

Complainants may refer to DfE (or relevant regulator) after completion of all internal stages.

8. Complaints made against the Principal/CEO or Chair of Governors, Chair of Trustees or a member of the Board of Trustees or Governing Body

Complaints made against the Principal/CEO should be directed to the Chair of Governors. Where a complaint is against the Chair of Governors, a member of the Governing Body or Board of Trustees, it should be submitted in writing to the Governance Officer (sross@thedeafacademy.ac.uk), who will seek advice from the Chair of Trustees. If a complaint is against the Chair of Trustees, it should be submitted in writing to the Governance Officer, who will seek advice from the Vice-chair of Trustees.

In all cases, the principles and timescales set out in the Academy's complaints procedure will be followed.

9. Managing Unreasonable Complaint Behaviour

The Academy recognises that complainants may sometimes experience distress, frustration or strong emotions. This alone does not make a complaint unreasonable.

As explained in this policy, we do recognise that AI may be used in some cases as a tool to assist parents and carers in articulating their concerns in relation to a complaint. However, as an Academy we do also have to safeguard our resources and ensure complaints do not become spurious but remain solution focused.

The Academy may take proportionate steps to manage complaint behaviour where actions significantly affect staff wellbeing, organisational functioning or the reasonable operation of the complaints process. Parents and Carers must still abide by the Parent and Carer code of Conduct (Appendix B), and we will not tolerate abusive/discriminatory comments or inappropriate behaviour towards staff.

Examples may include:

- Excessive or overwhelming correspondence
- Repeated reframing of resolved matters
- Aggressive, abusive or threatening language
- Unrealistic response expectations
- Repeated submission of substantially repetitive material
- Copying excessive numbers of external parties into correspondence
- Refusal to engage with reasonable process arrangements
- Persistent escalation without material new evidence

In such cases, the Academy may:

- Limit communication to a single point of contact
- Limit frequency of responses
- Decline to respond to repeated issues already addressed
- Summarise grouped concerns into a single response
- Close a complaint where the process has been exhausted reasonably and proportionately

In severe situations where there is a breakdown of trust on both the sides the Academy may suspend services while matters are resolved.

Any such actions will be reasonable, proportionate and recorded appropriately.

10. Record Keeping

The Academy will maintain appropriate records of complaints and concerns received, investigations undertaken, outcomes, actions and correspondence. Records will be retained in accordance with the Academy's data protection and records retention policies and may be shared where required by law, including through inspection, safeguarding processes or data protection requests (e.g. Subject Access Requests).

11. Monitoring and Review

The Governing Body and Senior leaders will monitor complaints trends and themes. Complaints will be used as a source of organisational learning. Themes and underlying issues will be reviewed to identify opportunities to improve practice, policy and provision.

This policy will be reviewed annually or earlier where required due to:

- Changes in legislation
- Regulatory guidance
- Operational learning
- Emerging sector practice

In addition:

- The Governing Body will be informed of serious complaints as they arise
- The Governing Body will be alerted to any significant increase in complaint volume
- An annual report on complaints will be presented to the Governing Body, including analysis of trends, outcomes and learning points

12. Legislation and statutory requirements

This policy is based on the following policy advice from the Department for Education (DfE):

- Children Act 1989
- Children Act 2004
- Equality Act 2010
- Data Protection Act 2018 and UK GDPR
- Special Educational Needs and Disability Regulations 2014
- Children's Homes (England) Regulations 2015
- Health and Social Care Act 2008 (Regulated Activities) Regulations 2014 UK Government
- Keeping Children Safe in Education (KCSIE)
- Ofsted Social Care Common Inspection Framework (SCCIF)

Appendix A – Complaint Form for Stage 2 (Formal Complaint submission)

Guidance

When completing this submission form and to support timely and fair handling of complaints, complainants are encouraged to:

- Focus on the key substantive concerns
- Avoid repetition
- Identify desired outcomes clearly
- Provide relevant evidence only
- Engage respectfully with staff and processes
- Stay within the character limit, any text exceeding it will not be submitted

[Complaints Form.docx](#)

Forms are to be returned to the Executive Assistant vclark@thedeafacademy.ac.uk to start the administration process.

Appendix B – Parent and Carer Code of Conduct

[Parent-Carer-code-of-conduct-QR.pdf](#)