



Complaints Policy

This policy applies to Steephill School, including the EYFS setting.

Policy owner: Headteacher

Approved by: Governing Body

Date of approval: September 2026

Review date: September 2027

Applies to: Parents/carers of current pupils and, where appropriate, former pupils where the complaint was initially raised while the child attended the School.

1. Policy Statement

Steephill School values strong and constructive partnerships with parents and pupils and prides itself on the quality of its teaching, pastoral care and safeguarding arrangements.

The School recognises that concerns or complaints may arise from time to time. Steephill School is committed to dealing with complaints fairly, transparently, consistently and promptly, while ensuring that the welfare and best interests of pupils remain central to its decision-making.

The purpose of this policy is to:

- provide a clear, accessible and transparent process for raising and resolving complaints;
- ensure that complaints are dealt with fairly and without discrimination;
- enable concerns to be resolved at the earliest appropriate stage;
- provide a formal procedure where informal resolution is unsuccessful;
- provide an independent panel hearing as the final stage of the School's internal complaints procedure;
- ensure that complaints are appropriately recorded and monitored;
- ensure that complaints raising safeguarding concerns are dealt with under the School's safeguarding procedures where appropriate;
- ensure compliance with the Education (Independent School Standards) Regulations 2014, KCSIE 2026, the EYFS statutory framework and applicable data protection legislation.

Steephill school will not penalise a parent or pupil for raising a complaint in good faith.

2. Legislative and Regulatory Framework

This policy has regard to and/or complies with the following legislation and statutory guidance, as applicable:

- Education (Independent School Standards) Regulations 2014, particularly Part 7, paragraph 33 – Manner in which complaints are handled;
- Keeping Children Safe in Education 2026 (KCSIE 2026);
- Working Together to Safeguard Children 2026;
- Equality Act 2010;

- Data Protection Act 2018, as amended;
- UK General Data Protection Regulation (UK GDPR);
- Data (Use and Access) Act 2025, including section 164A of the Data Protection Act 2018 relating to complaints by data subjects;
- Early Years Foundation Stage (EYFS) statutory framework for group and school-based providers, current from September 2026;
- other relevant statutory guidance and legislation applicable to independent schools.

SteePhill School will also have regard to relevant Department for Education and Independent Schools Inspectorate guidance.

SteePhill School's complaints procedure meets the requirements of paragraph 33 of the Independent School Standards Regulations, including provision for informal resolution, a formal written complaint, a panel hearing, an independent panel member, accompaniment at a panel hearing and the keeping of appropriate records.

3. Scope of the Policy

This policy applies to complaints made by parents or carers of pupils attending SteePhill School.

It may also apply to a parent or carer of a former pupil where the complaint relates to circumstances which arose while the child attended the School.

Where a complaint is made by someone who is not a parent or carer of a pupil, the School will determine whether and how the matter should be considered.

The School reserves the right to decline to investigate complaints which:

- fall outside the scope of the School's responsibilities;
- relate to matters which have already been appropriately considered and concluded through this procedure;
- are anonymous, unless the matter raises a significant safeguarding or other serious concern;
- are made maliciously or without reasonable grounds;
- relate to matters for which there is a separate statutory procedure or appeal route.

Where another procedure is more appropriate, the complainant will normally be advised accordingly.

4. Complaints Which Raise Safeguarding Concerns

A complaint may include or disclose a concern about the safety or welfare of a child.

Where a complaint raises a safeguarding concern, the School will not rely solely on this complaints procedure. The matter will be referred immediately to the Designated Safeguarding Lead (DSL) or their deputy and managed in accordance with the School's Child Protection and Safeguarding Policy.

All staff must act immediately on safeguarding concerns and report them to the DSL or deputy without delay. KCSIE 2026 emphasises that safeguarding is everyone's responsibility, that concerns must be acted upon immediately and that information should be shared where necessary to protect a child.

Where appropriate, the School may refer concerns to:

- Children's Social Care;
- the Local Authority Designated Officer (LADO);
- the police;
- the relevant safeguarding partnership;
- another appropriate statutory agency.

Where the complaint concerns an allegation about a member of staff, volunteer, contractor or other person working with children, Steephill School will follow its procedures for managing allegations against adults and will involve the LADO where the relevant threshold is met.

A safeguarding concern will not be delayed because a parent has also submitted a formal complaint.

5. Principles of the Complaints Procedure

Steephill School will:

- treat complaints seriously and respectfully;
- investigate complaints objectively and impartially;
- provide reasonable opportunities for complainants to explain their concerns;
- maintain appropriate confidentiality;
- communicate clearly about the progress and outcome of complaints;
- make reasonable adjustments where required to enable a complainant to access the complaints procedure;

- take account of relevant equality and accessibility considerations;
- avoid unnecessary delay;
- keep appropriate records;
- use complaints as an opportunity to identify learning and improve School practice.

A complaint does not imply that the School accepts that an error or failing has occurred.

6. Who Can Make a Complaint?

The complaints procedure is available to parents and carers of pupils at Steephill School.

For the purposes of this policy, "parent" includes any person who has parental responsibility for a child or who has care of a child, where appropriate.

The School may ask a complainant to confirm their relationship with the pupil where this is necessary to protect confidentiality or the child's welfare.

7. Stage 1 – Informal Resolution

Steephill School hopes that most concerns can be resolved quickly and informally.

Parents should normally raise concerns in the first instance with the member of staff most directly involved, usually the child's Class Teacher.

Concerns may be raised verbally, by telephone, email or in person.

The member of staff will:

- listen carefully to the concern;
- seek to understand the issue;
- investigate or clarify matters where appropriate;
- provide an explanation;
- seek to resolve the concern promptly.

The School will normally respond within 2 school days, although more complex matters may require additional time.

Where necessary, the member of staff may consult the Headteacher or another appropriate senior member of staff.

Where a concern is raised directly with the Headteacher, the Headteacher may:

- address the matter personally; or
- refer it to the appropriate member of staff where this is considered the most effective way of resolving it.

If the concern cannot be resolved informally within a reasonable period, or if the parent remains dissatisfied, the parent may proceed to Stage 2.

8. Stage 2 – Formal Complaint

If the matter cannot be resolved informally, the complainant should submit the complaint in writing to the Headteacher.

The complaint should include:

- the nature of the complaint;
- relevant dates and events;
- the names of individuals involved, where known;
- any relevant supporting information or documentation;
- the outcome sought by the complainant, where appropriate.

The Headteacher will acknowledge receipt normally within 2 school days.

The Headteacher will normally arrange an opportunity to discuss the complaint with the complainant within 5 school days, where appropriate.

The Headteacher will investigate the complaint fairly and objectively.

This may involve:

- reviewing relevant records;
- speaking to staff or other relevant individuals;
- reviewing correspondence or documentation;
- considering relevant School policies;
- obtaining further information where necessary.

The investigation will normally be completed within 10 school days.

Where this is not reasonably practicable, the complainant will be informed of the reason for the delay and given an indication of when a response is expected.

The Headteacher will normally provide a written outcome within 15 school days of receipt of the formal complaint, subject to any necessary extension explained to the complainant.

The written response will:

- summarise the complaint;
- explain the investigation undertaken;
- set out the findings;
- explain the decision reached;
- identify any actions to be taken, where appropriate;
- explain how the complainant may proceed to Stage 3 if they remain dissatisfied.

9. Complaints Concerning the Headteacher

Where a complaint concerns the Headteacher, the complaint should be submitted to the Chair of Governors.

The Chair of Governors will determine the appropriate person to investigate and oversee the complaint.

The Headteacher will not investigate a complaint about themselves.

Where the complaint reaches Stage 3, the panel will be constituted in accordance with paragraph 11 of this policy.

10. Complaints Concerning a Governor

Where a complaint concerns an individual Governor, it should normally be referred to the Chair of Governors.

Where the complaint concerns the Chair of Governors, it should be referred to the Vice-Chair of Governors or another appropriate Governor nominated to oversee the complaint.

A Governor who is directly involved in the complaint will not participate in its determination.

Where necessary, the Board of Governors may appoint an appropriately independent person to assist with the investigation or panel process.

11. Stage 3 – Complaints Panel Hearing

If the complainant remains dissatisfied following the Stage 2 outcome, they may request that the complaint be considered by a Complaints Panel.

The request should be made in writing to the Chair of Governors normally within 10 school days of the Stage 2 outcome.

The Chair will acknowledge receipt normally within 3 school days.

The Complaints Panel will consist of at least three people who have not been directly involved in the matters complained about.

At least one member of the panel will be independent of the management and running of the School, in accordance with the Independent School Standards Regulations.

The panel will consider the complaint impartially and fairly.

The complainant will be given reasonable notice of the panel hearing.

The School will normally provide relevant documentation to the complainant and panel members at least 5 school days before the hearing, subject to appropriate redaction and data protection requirements.

The complainant may be accompanied by one other person at the hearing, such as a friend, relative or supporter.

The accompanying person will not normally be permitted to act as legal representative unless the School has agreed otherwise in advance.

The panel may:

- consider written evidence;
- hear from the complainant;
- hear from relevant School representatives;
- ask questions to clarify matters;
- consider whether the School's procedures were followed;
- consider whether the outcome reached at Stage 2 was reasonable and supported by the evidence;
- make findings and recommendations.

The panel will not normally reinvestigate matters which have already been appropriately investigated unless it considers that further investigation is necessary to reach a fair conclusion.

The panel will aim to reach a decision as soon as reasonably practicable and normally within 7 school days of the hearing.

The complainant will receive the panel's findings and recommendations in writing.

A copy of the findings and recommendations will be:

- provided to the complainant;
- provided, where relevant, to the person complained about;
- made available for inspection by the proprietor and Headteacher.

The decision of the Complaints Panel is the final stage of the School's internal complaints procedure.

12. Complaints Involving the Board of Governors

Where a complaint concerns the Board of Governors, the School will make appropriate arrangements to ensure that the complaint is considered by someone who has not been directly involved in the matter.

Where a complaint concerns the Chair of Governors, the Vice-Chair or another appropriately independent Governor will oversee the procedure.

Steephill School will take reasonable steps to ensure that no person is involved in determining a complaint where their involvement could reasonably give rise to a conflict of interest.

13. Early Years Foundation Stage (EYFS)

Steephill School will comply with the current EYFS statutory framework for group and school-based providers.

Complaints relating specifically to the EYFS will be investigated and the complainant will be notified of the outcome within 28 days, where the EYFS requirements apply.

Written records of EYFS complaints, including the investigation, outcome and action taken, will be retained for at least 3 years, or longer where required by another statutory or safeguarding requirement.

Where a complaint raises a safeguarding concern about a child in the EYFS, the School's safeguarding procedures will take precedence over the ordinary complaints process.

The current EYFS statutory framework came into force on 1 September 2026.

14. External Regulatory Bodies

Steephill School is an independent school.

Parents should normally complete the School's complaints procedure before contacting an external regulator about the handling of a complaint.

The Department for Education (DfE) is responsible for considering complaints about independent schools as regulator. The DfE may consider whether the School is meeting the Independent School Standards and may take regulatory action where appropriate.

The DfE explains that it does not investigate individual complaints in the same way as a local authority complaint process, but may consider reports of significant failures to meet the Independent School Standards and may ask an inspectorate to undertake inspection activity.

Parents may contact:

Department for Education

School Complaints Compliance Unit
Piccadilly Gate
Store Street
Manchester
M1 2WD

Where a complaint concerns a registered early years provision which is separately registered with Ofsted, Ofsted may have a role in relation to that provision.

Ofsted does not generally investigate complaints about independent schools themselves; complaints about independent schools are referred to the DfE.

Where appropriate, parents may also contact the Independent Schools Inspectorate (ISI) in relation to matters relevant to its inspection remit.

15. Data Protection Complaints

Complaints concerning the handling of personal data are subject to applicable data protection legislation.

Steephill School is a data controller and will provide a means by which an individual can make a data protection complaint directly to the School.

Under section 164A of the Data Protection Act 2018, as inserted by the Data (Use and Access) Act 2025, a data subject may complain to the data controller where they consider that their data protection rights have been infringed.

The School will:

- facilitate the making of data protection complaints;
- acknowledge receipt within 30 days;
- make appropriate enquiries;
- respond without undue delay;
- keep the complainant informed of progress where appropriate;
- inform the complainant of the outcome.

These statutory requirements have been in force since 19 June 2026.

Data protection complaints should be directed to the Bursar using the School's Data Protection Complaints Form, available from:

bursar@steephill.co.uk

A complainant who remains dissatisfied may also complain directly to the Information Commissioner's Office (ICO).

Data protection complaints will normally be dealt with separately from the School's ordinary complaints procedure where this is necessary to comply with data protection legislation.

16. Confidentiality

All complaints will be handled sensitively and confidentially.

Information will be shared only with those who need it for the purpose of investigating, managing or responding to the complaint, or where disclosure is required by law or necessary to safeguard a child or another person.

Confidentiality does not prevent the School from sharing information with:

- Children's Social Care;
- the police;
- the LADO;
- safeguarding partners;
- regulatory bodies;
- professional advisers;
- other agencies where there is a lawful basis for doing so.

Steephill School will not promise absolute confidentiality where information may need to be shared to protect a child.

17. Record Keeping

Steephill School will maintain a written record of formal complaints made under Stage 2 and Stage 3.

Records will include, where applicable:

- the complaint;
- the date received;
- the person responsible for investigating it;
- actions taken;
- relevant correspondence;
- the outcome;
- whether the complaint proceeded to a panel hearing;
- any action taken by the School as a result of the complaint.

This reflects the requirements of paragraph 33 of the Independent School Standards Regulations.

Complaint records will be held securely, with access restricted to authorised personnel.

The School will retain complaint records for 7 years, unless:

- a longer retention period is required by law;
- the complaint relates to safeguarding or an allegation against an adult, in which case the School's safeguarding records-retention arrangements will apply;

- litigation, regulatory action or another legal process requires the records to be retained for longer.

Safeguarding records will not be destroyed merely because the associated complaint has been concluded.

Steepphill School's safeguarding records will be retained in accordance with KCSIE 2026 and the School's Child Protection and Safeguarding Policy.

18. Complaints and Data Protection

Complaint records constitute personal data and may contain special category or highly sensitive information.

The School will process complaint information in accordance with:

- the UK GDPR;
- the Data Protection Act 2018, as amended;
- the School's Privacy Notice;
- the School's Data Protection Policy;
- applicable records-management and retention requirements.

Parents should be aware that the School may be unable to disclose confidential information about another pupil, family or member of staff in response to a complaint.

This does not prevent the School from providing an appropriate explanation of its actions and decisions.

19. Complaints Involving Children

Where a complaint relates to a pupil, the School will consider the child's welfare, safety and best interests.

Where appropriate, the School may seek the pupil's views, taking account of their age, maturity, communication needs and individual circumstances.

Steepphill School will not normally require a child to participate directly in a complaint process where doing so could cause distress or place them at risk.

Where a complaint concerns bullying, child-on-child abuse, discrimination, harassment, sexual harassment or violence, the School's relevant safeguarding, behaviour and anti-bullying procedures will also apply.

20. Complaints Relating to Discrimination

Steephill School is committed to complying with the Equality Act 2010.

Complaints involving alleged discrimination, harassment or victimisation relating to a protected characteristic will be taken seriously and investigated appropriately.

Steephill School will consider whether reasonable adjustments are required for a pupil or parent with a disability.

Where a complaint raises safeguarding concerns, the School's safeguarding procedures will also apply.

21. Complaints About Staff Conduct

Where a complaint concerns the conduct or performance of a member of staff, the School will distinguish between:

- a complaint about the service or decision provided by the School; and
- an allegation that a member of staff has harmed, or may pose a risk of harm to, a child.

The latter will be dealt with under the School's safeguarding procedures and, where appropriate, the procedures for allegations against adults working with children.

Steephill School may need to restrict information provided to a complainant where disclosure would breach confidentiality, employment law or data protection legislation.

22. Complaints About Other Parents or Visitors

Where a complaint concerns the conduct of another parent, visitor or member of the School community, the School will determine the most appropriate procedure.

This may include the Behaviour Policy, safeguarding procedures, site-access arrangements, or other relevant School policies.

Steephill School may take reasonable steps to protect pupils, staff and other members of the School community from threatening, abusive or inappropriate behaviour.

23. Managing Serial, Persistent or Unreasonable Complaints

Steephill School is committed to considering legitimate complaints fairly and will not label a complaint as unreasonable simply because it is persistent, strongly expressed or critical of the School.

However, the School may take proportionate steps where a complainant's behaviour is unreasonable or abusive, including where:

- the same complaint has already been fully investigated and concluded;
- repeated correspondence does not raise any new substantive issue;
- the complainant repeatedly changes the substance of the complaint;
- communication becomes abusive, threatening or discriminatory;
- demands are disproportionate or unreasonable;
- staff are subjected to repeated communications which prevent them from carrying out their normal duties.

Before restricting communication, the School will normally explain why restrictions are necessary.

Possible measures include:

- identifying a single point of contact;
- limiting communication to specified methods;
- agreeing reasonable contact times;
- requiring communication to be in writing;
- placing reasonable limits on the frequency of communication;
- restricting access to School premises where there is a genuine safety or security concern.

Any communication restriction will be proportionate, time-limited and reviewed periodically.

A communication restriction will **not** prevent a person from raising a genuine safeguarding concern, exercising a statutory right, making a data protection complaint or accessing an appropriate external regulatory body.

Where behaviour amounts to a threat of violence, criminal conduct or an immediate safeguarding concern, the School may contact the police or another appropriate agency.

24. Complaints Made Anonymously

Anonymous complaints will be considered at the Headteacher's discretion.

Where an anonymous complaint raises a serious safeguarding, child protection, criminal or regulatory concern, the School will assess the information and take appropriate action regardless of whether the complainant can be identified.

Steephill School may be unable to provide an outcome to an anonymous complainant.

25. Complaints About Matters Outside the School's Control

Where a complaint concerns a matter outside the School's control, the School will explain this and, where appropriate, identify the organisation or process responsible for the matter.

Where another statutory complaints or appeal process applies, the School will signpost the complainant to that process.

Examples may include:

- criminal matters – police;
- child protection concerns – Children's Social Care/police as appropriate;
- data protection – School's Data Protection Lead and/or ICO;
- employment matters – appropriate employment procedures;
- matters relating to external examination bodies – relevant awarding organisation;
- matters concerning another statutory agency – the relevant agency.

26. Reasonable Adjustments and Accessibility

Steephill School will make reasonable adjustments to enable parents with disabilities or additional needs to access the complaints process.

This may include, where appropriate:

- providing information in an accessible format;
- allowing complaints to be made verbally where appropriate;

- arranging meetings by telephone or online;
- providing additional time where reasonable;
- allowing a supporter or advocate to assist a complainant.

Steephill School will balance accessibility with the need to ensure that the complaints procedure remains manageable and fair to all parties.

27. Learning From Complaints

Complaints will be viewed as an opportunity to identify learning and improve School practice.

Where a complaint identifies a weakness, the School may:

- amend a policy or procedure;
- provide additional staff training;
- improve communication with parents;
- introduce additional safeguarding or pastoral measures;
- review provision or practice;
- monitor the effectiveness of actions taken.

The School will not treat the number of complaints alone as a measure of School effectiveness.

28. Annual Review and Reporting

Steephill School will monitor complaints throughout the academic year.

The Headteacher and Governors will review:

- the number of formal complaints;
- the subject matter of complaints;
- the stages reached;
- whether complaints were resolved;
- whether any proceeded to a panel hearing;
- actions taken as a result;
- any recurring themes or patterns;
- any implications for safeguarding, equality or School improvement.

The School will include the number of formal complaints registered under the formal procedure during the preceding academic year in the information made available to parents, as required by the Independent School Standards.

For the 2025–26 academic year, the School received 1 formal complaint, of which 0 proceeded to a panel hearing.

The Board of Governors will use complaint information to monitor the effectiveness of the School's procedures and identify any required action.

29. Publication and Availability

This Complaints Policy will be made available to parents on the School's website.

A hard copy will be provided upon request.

Steephill School will ensure that parents are able to access the procedure without unreasonable barriers.

The published procedure will include clear information about:

- how to raise a complaint;
- the stages of the procedure;
- relevant timescales;
- the panel process;
- how to raise safeguarding or data protection concerns;
- appropriate external regulatory routes.

30. Review of the Policy

This policy will be reviewed annually by the Headteacher and Governing Body, or sooner where:

- legislation changes;
- statutory guidance is updated;
- inspection findings identify a required amendment;
- the School identifies a significant weakness in the procedure;
- experience of complaints indicates that changes are necessary.

The policy will be reviewed against the current Independent School Standards, KCSIE, EYFS requirements, data protection legislation and other relevant statutory guidance.

Next scheduled review: September 2027