

**REBUILDING CONFIDENCE
REIMAGINING EDUCATION RESTORING FUTURES
IMAGINE
“A BRIGHTER FUTURE”**



Complaints Policy

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Introduction

Imagine Wellbeing School (IW) is dedicated to providing a safe, nurturing and aspirational educational environment where every child and young person can flourish and achieve their potential. As an Independent Special School, we deliver therapeutic education and health- and care-informed provision for pupils with complex and additional needs, including Special Educational Needs and Disabilities (SEND). Our work is rooted in a trauma-informed, relational approach that prioritises inclusion, wellbeing, dignity and respect, alongside strong expectations for learning, personal development and positive outcomes.

IW is committed to openness, transparency and continuous improvement. We recognise that trust is built through clear communication, consistent practice, and a willingness to listen and respond. We therefore welcome constructive feedback from pupils, parents, carers, staff, commissioning partners and other stakeholders. Feedback—both positive and negative—helps us understand what is working well and where we must improve. We view complaints not as something to avoid, but as an opportunity to learn, strengthen practice, and improve pupils' experiences and outcomes.

We aim to resolve concerns as early as possible and at the lowest appropriate level, through respectful dialogue and timely action. Where concerns cannot be resolved informally, this Complaints Policy sets out a clear and accessible process for raising and handling formal complaints. The policy ensures that all complaints are managed consistently, fairly and without disadvantage to the complainant or the pupil concerned. IW will ensure that the complainant is kept appropriately informed throughout the process and that outcomes are clearly communicated.

To support effective implementation, the Headteacher has overall responsibility for overseeing complaints and ensuring they are handled professionally, sensitively, and impartially. The Headteacher will ensure that complaints are recorded, tracked, responded to within agreed timescales, and used to inform service improvement. Where appropriate, complaints may be escalated to the Proprietors or to an independent panel to ensure objective consideration, in line with the expectations for Independent Schools.

This policy is written to meet statutory and regulatory expectations, including the Independent School Standards (particularly the requirements relating to complaints procedures). It is aligned with safeguarding duties and national guidance. Any complaint that raises a safeguarding concern or indicates a risk of harm to a child will be managed in line with the school's safeguarding procedures and statutory guidance (including Keeping Children Safe in Education), and may be referred to relevant external agencies where required.

This Complaints Policy applies to complaints about any aspect of school life and provision, including (but not limited to): the quality of education; therapeutic and wellbeing support; behaviour management; communication with families; the school environment; health and safety; leadership and management; and how decisions have been made. IW is committed to ensuring that every complaint is taken seriously, handled respectfully, and used to strengthen a culture of accountability and continuous improvement.

Purpose

The purpose of this Complaints Policy is to ensure that any concern or complaint about Imagine Wellbeing School (IW) is handled in a clear, fair, consistent and timely way. IW is committed to resolving issues at the earliest possible stage, learning from concerns raised, and improving practice and provision so that pupils receive safe, high-quality education, care and therapeutic support.

This policy sets out:

- how concerns can be raised informally and formally;
- the stages of the complaints process, including timescales and escalation routes;
- how IW records, investigates and responds to complaints;
- how confidentiality, equality, reasonable adjustments and safeguarding are embedded within the process; and
- how outcomes are communicated, and actions are monitored to ensure improvement.

Scope

This policy applies to complaints made by parents, carers, pupils (where appropriate), staff, visitors, commissioning partners and members of the public about the operation of the school and the services it provides.

Complaints may relate to any aspect of school life, including (but not limited to):

- quality of education, curriculum, teaching and learning;
- therapeutic, pastoral, wellbeing and behaviour support;
- SEND provision, reasonable adjustments, and implementation of EHCPs/support plans;
- safeguarding practice (noting the separate safeguarding reporting routes outlined below);
- health and safety, site management and facilities;
- communication with families and professional conduct;
- leadership and management decisions;
- admissions, transition arrangements, attendance and transport arrangements (where the school is responsible);
- administration, finance, charges (where applicable), and data handling; and
- complaints about services provided by contractors working on behalf of the school.

What this policy does not cover

Some matters have separate procedures. Where a concern falls into one of the categories below, IW will signpost or route the concern appropriately:

- **Safeguarding concerns/child protection:**
Any allegation or concern that a child may be at risk of harm, has been harmed, or may be harmed will be acted on immediately in line with the school's Safeguarding and Child Protection Policy and statutory guidance. These concerns must be reported to the Designated Safeguarding Lead (DSL) without delay. The complaints process will not be used to delay safeguarding action.
- **Allegations about adults working with children:**
Concerns about the behaviour of staff or volunteers that meet the threshold for an allegation will be managed under the school's safeguarding/allegations procedures and may involve referral to the relevant Local Authority Designated Officer (LADO).
- **Staff grievances, disciplinary matters, or whistleblowing:**
These will be managed in accordance with the school's HR procedures and/or Whistleblowing Policy.
- **Appeals and statutory routes:**
Some matters (for example, certain decisions relating to SEND processes or admissions, depending on the specific legal basis) may have separate statutory appeal routes. Where this applies, IW will provide appropriate guidance and signposting.

Access, equality and reasonable adjustments

IW recognises that many of our families and pupils may experience additional barriers when accessing services or raising concerns. We will make reasonable adjustments to the complaints process to ensure it is accessible.

This may include:

- providing information in an alternative format;
- offering supported meetings or telephone appointments;
- using clear, plain language and agreeing on communication preferences;
- allowing an advocate or representative to support the complainant; and
- adjusting meeting arrangements and timescales where this supports fair access, while still ensuring timely resolution.

Principles underpinning the complaints process

IW will ensure that:

- complaints are treated seriously, respectfully and without bias;
- investigations are proportionate, evidence-informed and appropriately recorded;
- confidentiality is maintained, with information shared only on a need-to-know basis;
- complainants are not disadvantaged for raising a complaint; and
- learning from complaints leads to clear actions, monitoring and improvement.

Legal Framework

As an independent school, Imagine Wellbeing School is legally required to comply with Part 7 of The Education (Independent School Standards) Regulations 2014, which outlines the requirements for managing complaints. The regulations mandate that:

- **Written Complaints Procedure:** Schools must have a straightforward, written complaints procedure available to parents,

carers, and other stakeholders.

- **Publicised and Accessible:** The complaints procedure must be publicised in an easily accessible format.
- **Stages of Complaint:** The procedure must include the option to raise complaints informally in the first instance, followed by a formal investigation and an appeal process involving an independent panel.
- **Record Keeping:** Schools must keep a written record of all complaints, whether they are resolved informally or require formal investigation and escalation.
- **Confidentiality:** The confidentiality of complainants and all parties involved must be maintained, except in cases where disclosure is legally required.

Key statutory and regulatory framework (non-exhaustive):

Education (Independent School Standards) Regulations 2014 – Part 7 (Manner in which complaints are handled) and related requirements.

[The Independent School Standards - Guidance for independent schools](#)

Department for Education (DfE) guidance: Independent School Standards (ISS) – guidance for independent schools on meeting the standards.

[Regulating independent schools - GOV.UK](#)

Keeping Children Safe in Education (KCSIE) – statutory safeguarding guidance (current version in force from 1 September 2025).

Ofsted: Complaints procedure and how to complain about a school (including the online complaints portal).

[Keeping children safe in education 2025](#)

Ofsted Education Inspection Framework (EIF) – for use from November 2025 (independent schools are inspected against the ISS as part of the inspection)

[Education inspection framework: for use from November 2025 - GOV.UK](#)

Ofsted: inspection information/toolkit for non-association independent schools – for use from January 2026.

https://assets.publishing.service.gov.uk/media/690b192b14b040dfe82922d6/Independent_schools_inspection_toolkit.pdf

Best practice advice for school complaints procedures (DfE).

[Best practice guidance for school complaints procedures 2020 - GOV.UK](#)

Bury Council – Complaints about schools (local signposting) and Bury Council complaints procedure (if a complaint relates to council services).

[Complaints about schools - Bury Council](#)

Equality Act 2010 – reasonable adjustments to ensure access to the complaints process for disabled complainants.

[Reasonable adjustments: a legal duty - GOV.UK](#)

Data Protection Act 2018 / UK GDPR – secure handling of personal data within the complaints process.

[Data protection: The UK's data protection legislation - GOV.UK](#)

Useful links (current at time of publication):

ISS Regulations 2014:

<https://www.legislation.gov.uk/ukxi/2014/3283>

DfE Independent School Standards Guidance (PDF):

https://assets.publishing.service.gov.uk/media/67605baec80a844a7aa4b7cb/Independent_School_Standards_Guidance.pdf

KCSIE (from 1 September 2025) (PDF):

https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf

Ofsted's 'Complain about a school' portal:

<https://complain.ofsted.gov.uk/>

Ofsted complaints procedure page:

<https://www.gov.uk/government/organisations/ofsted/about/complaints-procedure>

Education Inspection Framework (EIF) (for use from November 2025):

<https://www.gov.uk/government/publications/education-inspection-framework/education-inspection-framework-for-use-from-november-2025>

Independent school inspection: toolkit, operating guides and information (for use from January 2026):

<https://www.gov.uk/government/publications/independent-school-inspection-toolkit-operating-guide-and-information>

Bury Council – complaints about schools:

<https://www.bury.gov.uk/schools-and-learning/complaints-about-schools>

Bury Council – complaints procedure:

Roles and Responsibilities in the Handling of Complaints

Clear roles and responsibilities ensure that complaints are managed consistently, fairly, and in a way that supports early resolution while protecting pupils' welfare. Imagine Wellbeing School (IW) expects all members of the school community to contribute to a culture of openness, respectful communication, and continuous improvement. All complaints will be handled in line with this Complaints Policy, the Independent School Standards, statutory safeguarding guidance (including Keeping Children Safe in Education), and relevant local arrangements for Bury (Greater Manchester).

Headteacher (Complaints Lead)

The Headteacher has overall responsibility for the day-to-day leadership and management of the school's complaints process, ensuring that complaints are handled in a professional, impartial and timely way.

Policy Oversight and Implementation

- Ensure the Complaints Policy is implemented consistently across the school and is available to parents/carers (including via the school website and on request in alternative formats).
- Ensure that staff understand the complaints process, including how to manage informal concerns and when to escalate to formal stages.
- Ensure the policy remains aligned with Independent School Standards and reflects current statutory guidance and regulatory expectations.

Complaint Resolution and Investigation

- Lead and manage the formal stages of complaint handling, including acknowledging complaints, agreeing on the complaint "scope" (what is being investigated), and clarifying desired outcomes.
- Investigate Stage 2 formal complaints in a proportionate, evidence-informed manner, gathering information from relevant staff, records, and (where appropriate) the complainant.
- Ensure the complainant receives clear communication at each stage, including:
 - confirmation of what is being investigated,
 - the timescales for response,
 - the outcome and reasons for decisions,
 - any actions taken or proposed (within confidentiality limits),
 - how to escalate if dissatisfied.

Safeguarding and Risk Management

- Where a complaint indicates a safeguarding concern, ensure it is immediately routed to the DSL and managed under safeguarding procedures (the complaints process must not delay safeguarding action).
- Where concerns relate to allegations about staff conduct that may meet the threshold for LADO, ensure the appropriate referral route is followed.
- Ensure appropriate risk assessments or interim measures are considered if a complaint identifies an immediate risk to pupil safety, wellbeing, or provision.

Record-Keeping and Quality Assurance

- Maintain a Complaints Register for formal complaints, ensuring each complaint is logged with dates, key actions, outcomes and any learning points.
- Ensure records are stored securely and retained in accordance with school retention schedules and data protection requirements.
- Ensure that complaint evidence is accessible for regulatory inspection (e.g., Ofsted) and for proprietor oversight, while preserving confidentiality.

Confidentiality, Equality and Reasonable Adjustments

- Maintain confidentiality throughout, sharing information strictly on a "need to know" basis and in line with legal requirements.

- Ensure the process is accessible, including offering reasonable adjustments (e.g., translated materials, supported meetings, advocacy, flexible communication methods) to ensure fair access.
- Manage expectations regarding what information can be shared, particularly where staff personal data or safeguarding information is involved.

Monitoring, Reporting and Annual Review

- Analyse complaints data and themes termly/annually, identifying any patterns (e.g., communication, transport, behaviour, provision, premises) and reporting learning to proprietors.
- Ensure improvement actions are recorded, tracked, and reviewed for impact.
- Work with the Proprietor to review the policy annually (or sooner if required) and update procedures in response to learning, regulatory changes, or operational developments.

School Proprietor (Governance Oversight and Escalation)

The Proprietor provides strategic oversight and ensures the school meets regulatory requirements, including those related to handling complaints. The Proprietor must ensure complaints are addressed fairly and that the process includes appropriate independence at the panel stage.

Oversight and Assurance

- Ensure the school has an effective complaints procedure that meets the Independent School Standards requirements.
- Provide governance scrutiny of how complaints are handled, ensuring fairness, consistency and compliance.
- Ensure adequate resources are available to implement the procedure (including access to independent panel members when required).

Appeals and Impartial Decision-Making

- Manage escalation where a complainant remains dissatisfied after the formal stage, ensuring the next stage is handled impartially.
- Ensure any appeal stage is conducted without bias and with appropriate separation from the original investigation, wherever possible.

Independent Panel Coordination

- Where a complaint proceeds to a Panel Hearing, ensure that arrangements meet regulatory expectations, including the presence of at least one independent panel member.
- Ensure that the panel process is properly documented, that the complainant has a fair opportunity to present their complaint, and that the panel's findings and recommendations are recorded.

Complaints Involving the Headteacher

- Where the complaint concerns the Headteacher, ensure that the complaint is managed in a way that preserves objectivity and fairness.
- Arrange for an alternative investigating officer/panel or external support where appropriate to avoid conflicts of interest.

External Communication and Regulatory Engagement

- Where a complaint is escalated externally, ensure that the school cooperates appropriately with regulators and provides the required documentation.
- Ensure that the school provides clear signposting to external routes (e.g., Ofsted, DfE, where applicable) while maintaining that the school's internal process is used first unless safeguarding thresholds require immediate external referral.

Learning and Improvement

- Review complaint themes with the Headteacher at least annually and ensure improvement actions are incorporated into school development planning and quality assurance systems.

Teaching and Support Staff

All staff play a key role in early resolution and in maintaining respectful, professional communication. Staff must know how to respond to concerns and when to escalate them.

Informal Stage Support (Stage 1)

- Receive concerns calmly and respectfully, listening carefully and seeking to resolve issues early wherever possible.
- Provide clear explanations, clarify misunderstandings, offer reassurance and apologies where appropriate, and take agreed actions within their remit.
- Keep a brief record of significant informal concerns (as directed by the Headteacher), particularly where the issue could escalate.

Escalation and Information Sharing

- Escalate unresolved concerns promptly to the Headteacher/Complaints Lead, providing relevant information and documentation.
- Cooperate with complaint investigations by contributing factual accounts and providing records where requested.

Professional Standards and Confidentiality

- Maintain confidentiality and professionalism at all times.
- Avoid discussing complaints informally with others who do not need to know.
- Ensure communications remain respectful, child-centred and solution-focused.

Training and Awareness

- Attend regular training/briefings on the complaints procedure, safeguarding thresholds, record-keeping expectations, and communication standards.
- Understand how to support reasonable adjustments for parents/carers and pupils (e.g., accessible communication).

Parents and Carers

IW values partnership with parents and carers and encourages open communication. Parents/carers are supported to raise concerns early and to engage in solutions.

Raising Concerns and Submitting Complaints

- Where possible, raise concerns informally first to support early resolution.
- Where the issue remains unresolved, submit a formal complaint in line with the procedure, providing relevant details (dates, incidents, desired outcomes) to support investigation.

Engagement in Resolution

- Participate in meetings or discussions as part of the complaint process and provide information that may assist in the resolution.
- Engage respectfully with staff, recognising the school's duty to maintain confidentiality and safeguard pupils and staff.

Representation and Support

- Parents/carers may be accompanied by a friend, advocate or representative at meetings, where appropriate (subject to the school's expectations regarding respectful conduct and confidentiality).
- Parents/carers are encouraged to identify any accessibility needs so the school can offer reasonable adjustments.

External Escalation

- If dissatisfied after completing the school's internal process, parents/carers may escalate concerns to external bodies as set out in the policy (e.g., Ofsted's complaints route or other relevant regulatory channels).

- Parents/carers should be aware that safeguarding concerns should be raised immediately through safeguarding routes, not delayed via the complaints procedure.

Aims of the Complaints Policy

Imagine Wellbeing School's complaints policy exists to ensure concerns are handled constructively, consistently and lawfully. It aims to:

- Support early resolution: encourage respectful, solution-focused conversations before issues escalate, while recognising that some matters must move straight to formal stages.
- Provide clarity and structure: set out a staged process with clear routes, responsibilities, and expected standards for communication, evidence, decision-making and outcomes.
- Ensure fairness and objectivity: apply a consistent approach to all complainants and all matters, with steps to avoid bias or conflicts of interest, and access to independent scrutiny where required.
- Maintain a child-centred focus: keep pupils' welfare, safety, dignity and education at the heart of decision-making, with appropriate SEND-informed reasonable adjustments.
- Meet regulatory expectations: ensure the school's procedures align with the Independent School Standards for complaints and support effective oversight by proprietors and regulators.
- Protect confidentiality appropriately: keep information secure and shared only when necessary, while making clear that confidentiality cannot prevent safeguarding action or lawful disclosure.
- Enable improvement: capture learning, identify patterns, and translate outcomes into actions, training, policy updates and service development with measurable follow-up.

Definition of a Complaint

For the purposes of this policy, a complaint is a clear expression by the complainant that the school has fallen short of an expected standard and that the complainant wants the school to take action to put matters right. A complaint may relate to:

- a decision (or lack of decision) made by the school;
- the standard, delivery or consistency of education, care, support or communication;
- the behaviour or conduct of staff, volunteers or contractors working on behalf of the school;
- the school environment, facilities, health and safety arrangements, or pupil experience.

A concern becomes a complaint when it is not resolved through initial discussion, when the complainant requests a formal response, or when the matter is serious enough to require investigation and a recorded outcome.

Staff should promptly and courteously respond to day-to-day queries or misunderstandings. Where there is uncertainty about whether an issue meets the threshold for a complaint, staff must seek guidance from a line manager or the Headteacher rather than dismissing or delaying the concern.

Who Can Make a Complaint?

A complaint may be raised by any person or organisation with a legitimate interest in the school's work or a pupil's experience, including:

- pupils (where developmentally appropriate and with support where needed);
- parents, carers and those with parental responsibility;
- placing/commissioning local authorities and other statutory partners;
- professionals and agencies working with the child or family;
- visitors, contractors, and members of the wider community, where their concern relates to the school's operations.

Where a complaint is made on behalf of another person, the school may seek confirmation that the complainant has consent/authority to act (unless doing so would create risk, e.g., where safeguarding concerns exist).

Time limits: Complaints should normally be raised as soon as possible to ensure evidence is available, and issues can be addressed quickly. Complaints raised outside the expected timeframe may still be considered if there is a good reason for the delay (for example, illness, exceptional family circumstances, or if the impact has only recently become apparent).

Publicity and Access to the Complaints Policy

Imagine Wellbeing School will ensure that the complaints procedure is easy to locate, understand and use. To support accessibility and transparency, the school will:

- make the policy available on the school website and provide it in print upon request;
- include the policy (or a clear summary and link) within admissions/welcome information;
- ensure staff know how to signpost families to the correct stage and contacts;

provide the policy in alternative formats where needed (large print, simplified wording, translated versions, supported read-through);
ensure stakeholders understand how to raise a concern, what information is needed for the school to investigate, and what to expect at each stage.

Confidentiality

The school will treat complaints sensitively and will take reasonable steps to protect the privacy of pupils, families and staff. Information connected to a complaint will be:

- recorded accurately and stored securely;
- shared only with those who need it to investigate, respond, or implement actions;
- handled in accordance with the school's data protection arrangements.

Confidentiality does not prevent appropriate action or lawful disclosure. The school may share relevant information where required to:

- protect a child or vulnerable person from harm;
- comply with legal duties or requests from regulators/government;
- cooperate with safeguarding or statutory processes.

The school expects all parties to communicate respectfully and to avoid public or social media discussion that could compromise confidentiality, pupil welfare, or the fairness of the process.

Equal Access, Accompaniment, and Representation

IW is committed to ensuring the complaints process is accessible to all stakeholders, including those who may face barriers due to SEND, disability, language, literacy, neurodiversity, mental health, or difficult life circumstances. The school will provide reasonable support and adjustments, which may include:

- alternative ways to submit a complaint (written, email, or supported meeting);
- interpreters, translators, advocacy support, or communication aids;
- flexible meeting arrangements, including remote options where appropriate;
- additional time to read documents or provide information;
- adjustments to communication style (clear language, structured summaries, agreed contact method).

Complainants may be accompanied to meetings by a supporter or representative. The school may set reasonable expectations to ensure meetings remain safe, respectful and productive for everyone involved.

Ofsted and External Oversight

IW recognises Ofsted's role in regulating independent schools and in considering concerns when evaluating compliance with the Independent School Standards. The school will therefore:

- ensure its internal procedure is robust, recorded, and completed properly;
- provide complainants with clear information about external escalation routes when internal stages are concluded (or where completion is not possible);
- cooperate appropriately with any regulatory enquiries, including the provision of required records.

Where a complaint indicates an immediate risk of harm, safeguarding action will take precedence over complaints timescales. Safeguarding concerns must be addressed immediately in line with KCSIE and the school's safeguarding procedures.

Bury Council Guidance and Local Signposting (Radcliffe/Bury)

Imagine Wellbeing School works openly with local partners and understands that some concerns may relate to **local authority services** rather than the school (for example, statutory SEND processes, transport commissioned by the local authority, or social care involvement). In these circumstances, the school will:

- clarify which organisation is responsible for the issue raised;
- support signposting to the correct route;
- cooperate with local authority processes where appropriate, particularly where a child's safety or statutory entitlements are involved.

Bury Council contact routes (for council services and complaints about council provision):

- Telephone: **0161 253 5000**
- Address: **Customer Services, Bury Council, Town Hall, Knowsley Street, Bury, BL9 0SW**
- Online: **Bury Council complaints information and online forms (via council website)**

Where a complaint includes safeguarding concerns, the school will follow its safeguarding procedures and make referrals to the appropriate agencies (including Bury's children's safeguarding routes) as required.

Scope of the Complaints Policy

This policy covers complaints about the school's provision and practice, including education, therapeutic support, behaviour approaches, communication, site arrangements, leadership decisions and the overall pupil experience. Some matters are managed through separate procedures or statutory routes. In these cases, the school will explain the correct pathway and, where appropriate, provide support to help the complainant access it. Examples include:

- admissions/placement decisions where alternative appeal routes apply;
- statutory SEND assessment processes led by the local authority;
- exclusions/suspensions (where specific DfE processes apply);
- whistleblowing disclosures (public interest concerns) managed under the Whistleblowing Policy;
- staff employment matters (grievance/disciplinary);
- complaints about services delivered by third parties (handled by the provider, with safeguarding oversight where relevant).

Where a complaint overlaps with safeguarding, disciplinary, criminal, or multi-agency processes, the school will manage the complaint alongside (or separately from) those processes in a way that protects children, preserves evidence, and supports lawful investigation. The school will explain any necessary adjustments to timescales or procedures and keep the complainant appropriately informed.

The Complaints Procedure

This section sets out the staged process Imagine Wellbeing School (IW) will use to manage concerns and complaints. The procedure is designed to be accessible, SEND-informed, proportionate, and compliant with Independent School Standards. At every stage, IW will be mindful of pupil welfare and will take appropriate steps to ensure pupils remain safe, supported and able to access education while a complaint is being addressed.

General principles that apply at every stage

- **Respectful communication:** All parties are expected to communicate respectfully. Abusive, discriminatory or threatening behaviour will not be tolerated.
- **Clarity of issues:** IW will confirm what issues are being considered, what evidence will be reviewed, and what outcome the complainant is seeking.
- **Reasonable adjustments:** IW will offer adjustments to enable fair access to the process (e.g., alternative formats, supported meetings, interpreters, and advocacy).
- **Confidentiality:** Information will be shared on a need-to-know basis, without preventing safeguarding action or lawful disclosures.
- **Safeguarding takes priority:** Any safeguarding concern identified within a complaint will be acted upon immediately using safeguarding procedures and may sit outside standard complaints timescales where necessary.

Stage 1: Informal Resolution (Concern raised with staff)

1.1 How to raise an informal concern

A concern can be raised verbally or in writing with the most appropriate member of staff, for example:

- class teacher/tutor
- phase/subject lead
- SENCO or pastoral/therapeutic staff (where relevant)
- School Business Manager (for premises/administration concerns)

If a concern is received by a staff member who is not best placed to respond, they must ensure it is promptly passed to the correct colleague and that the complainant knows who will respond.

1.2 What happens at Stage 1

The staff member will:

- listen carefully and clarify the concern, including what "resolution" would look like;
- check any immediate welfare or safety issues (including SEND, health, behaviour or safeguarding factors);
- consider whether the concern can reasonably be resolved immediately or requires input from others;

- agree on the next steps with the complainant, including when they will be updated.
-

1.3 Possible outcomes at Stage 1

Depending on the nature of the concern, Stage 1 may involve:

- explanation and reassurance;
- immediate corrective action (e.g., communication clarification, timetable adjustment, practical fix);
- agreement of support strategies or monitoring arrangements;
- apology where appropriate;
- a plan for review (e.g., “we’ll trial this for 2 weeks and update you”).

1.4 Recording at Stage 1

Stage 1 is intended to remain informal. However, a brief note may be made where:

- the issue relates to pupil safety/welfare;
- the concern is likely to reoccur or escalate;
- there is a pattern of repeated concerns;
- the complainant asks for a written summary.

This helps the school act consistently and reduces the risk of misunderstanding later.

1.5 Stage 1 timescale

IW aims to resolve informal concerns within **10 working days**, where possible. If resolution requires further investigation or multi-person input, the complainant will be informed of the following steps and the expected timescale.

Stage 2: Formal Complaint to the Headteacher

2.1 How to submit a formal complaint

If the complainant considers the matter unresolved at Stage 1, they can submit a formal complaint to the Headteacher in writing (email or letter). Where a complainant needs support to put a complaint in writing, the school will offer assistance and reasonable adjustments.

2.2 What the complaint should include

- To support a fair investigation, the complaint should include:
- complainant name and contact details;
- relationship to the pupil/school (where relevant);
- a clear statement of the complaint (what happened and why it is a concern);
- key dates, events, locations, and names (where known);
- any steps already taken at Stage 1;
- what outcome the complainant would like.

If information is missing, the Headteacher may request clarification to ensure the complaint is investigated accurately.

2.3 Acknowledgement and initial checks

On receipt, the Headteacher will:

- acknowledge the complaint within one working day;
- confirm the stage and outline the following steps;
- check whether any part of the complaint triggers safeguarding/allegations procedures (these will be routed immediately and may run alongside or outside the complaints process);
- consider whether immediate interim action is needed to protect pupils or prevent escalation (e.g., short-term adjustments to routines, supervision, communication arrangements).

2.4 Investigation process

The Headteacher (or a delegated investigating officer where appropriate) will:

- define the issues being investigated and confirm these to the complainant;
- gather evidence proportionate to the complaint, which may include:
 - written statements/accounts,
 - pupil records (as appropriate),

- relevant policies,
- logs (behaviour, attendance, incidents, communications),
- health and safety records,
- documentation relating to EHCP/support plans (where relevant and lawful to share);
- meet with staff involved and, where appropriate, the complainant;
- consider any SEND-related context, including communication needs, sensory triggers, regulation needs, and any required reasonable adjustments;
- maintain oversight of pupil welfare and ensure support continues throughout the process.

2.5 Written response

The Headteacher will provide a written response within 10 working days of receipt of the formal complaint. Where the complaint is complex (e.g., multiple witnesses, significant records, overlapping processes), the school may extend by up to 5 further working days. The complainant will be informed of the reason for the extension and the revised response date.

The response will set out:

- findings for each element of the complaint (upheld / partially upheld / not upheld);
- reasons for the decision (summary of evidence considered);
- any actions already taken and any actions planned (with timescales where possible);
- learning points or improvements identified (as appropriate);
- how to request escalation to Stage 3.

Stage 3: Formal Review/Appeal to the Proprietor

3.1 Requesting a Stage 3 review.

If dissatisfied with the Stage 2 outcome, the complainant may request a review by the Proprietor. The request must be made in writing within 10 working days of receipt of the Stage 2 response.

The complainant should:

- identify which parts of the Stage 2 response they disagree with;
- explain why they believe the complaint remains unresolved;
- indicate what outcome they are seeking at this stage.

3.2 What Stage 3

considers: Stage 3 is a

review of:

- whether the complaint was investigated appropriately;
- whether the conclusions were reasonable based on the evidence;
- whether actions proposed are proportionate and address the issues raised;
- whether the process was fair and compliant.

The Proprietor may:

- request further clarification from the complainant;
- seek additional information from staff;
- review documents and records;
- meet with relevant parties where appropriate (ensuring fairness and clear structure).

If the complaint is about the Headteacher, the Proprietor will lead the process and may appoint an alternative

investigator or seek external input to ensure impartiality.

3.3 Stage 3 response timescale

The Proprietor will provide a written response within 10 working days, with a possible extension of up to 5 working days where necessary. If extended, the complainant will be informed of the revised timeframe and reason.

Stage 4: Independent Panel Hearing

4.1 Requesting a panel hearing

If the complainant remains dissatisfied after Stage 3, they may request an Independent Panel Hearing in writing within **10 working days** after receiving the Stage 3 response.

4.2 Panel composition and independence

The panel will:

- have **at least three members**;
- include **at least one member independent** of the management and running of the school;
- exclude any person who has had material involvement in the matters complained of;
- require panel members to declare conflicts of interest and step aside where conflicts exist.

4.3 Preparation and paperwork

IW will:

- confirm the date, time, venue and format (in-person/remote where appropriate);
- confirm who will attend and representation arrangements;
- share a bundle of relevant papers in advance, typically including:
 - the complaint,
 - Stage 2 and Stage 3 outcomes,
 - key evidence relied upon (redacted where necessary),
 - relevant policy extracts.

4.4 The hearing process

The Chair will:

- explain the purpose and format of the hearing;
- ensure respectful conduct and equal opportunity to speak;
- keep the discussion focused on the complaint issues and evidence.

The panel will consider:

- the substance of the complaint;
- the reasonableness of previous investigations and decisions;
- whether further recommendations are appropriate.

The complainant may attend and may be accompanied by a friend, relative or advocate. The school may also be represented.

4.5 Timescales and panel decision

- The hearing will usually be arranged within **20 working days** of receiving the request, unless exceptional circumstances apply (e.g., safeguarding or police processes where delay is necessary).
- The panel will provide written findings, decisions and (if applicable) recommendations within **10 working days** of the hearing.

The panel's written outcome will be sent to:

- the complainant;
- the Headteacher;
- the Proprietor.

A written record of the complaint and its outcome will be kept on the school premises and made available for inspection where required.

Monitoring and Record Keeping (Complaints Register)

IW will maintain a formal Complaints Register to record all complaints that progress beyond Stage 1. The register will include:

- date received;
- complainant category (e.g., parent/carer, pupil, LA, community—without unnecessary personal data);
- summary of complaint themes;
- stage reached and dates of responses;
- outcome (upheld/partially upheld/not upheld);
- actions taken and completion monitoring;
- notes on any reasonable adjustments;
- whether safeguarding/allegations pathways were triggered (without inappropriate detail).

The Headteacher and Proprietor will review complaint themes annually (and more frequently if needed) to identify patterns, training needs, policy updates and service improvements.

Stage 5: External escalation and signposting

Once the school's procedure is completed (including the Independent Panel Hearing), complainants may choose to raise concerns externally depending on the issue:

- Ofsted: for concerns about regulatory compliance (including Independent School Standards) and matters that may inform inspection/regulatory activity.
- Department for Education (DfE): for concerns indicating potential non-compliance relating to registration/regulatory expectations for independent schools.
- Bury Council (Radcliffe/Bury): where the matter relates to a council service rather than the school (e.g., statutory SEND services, LA transport, social care processes):
 - Tel: 0161 253 5000
 - Address: Customer Services, Bury Council, Town Hall, Knowsley Street, Bury, BL9 0SW
- Safeguarding: where a child is at immediate risk of harm, call 999. Safeguarding referrals in Bury should be made via the relevant local safeguarding routes (including Bury children's safeguarding referral/MASH arrangements). The school will follow its safeguarding procedures and KCSIE at all times.

Appendix: Templates and Proformas

These templates support consistent and timely complaint handling. They should be tailored to each case and used alongside the Complaints Register.

Template 1: Stage 2 – Acknowledgement of Formal Complaint

[School letterhead/email footer]

Date: [DD Month YYYY]

Ref: [Complaint reference number]

Dear [Name],

Thank you for your written complaint received on [date]. I am writing to acknowledge receipt and confirm that your complaint has been logged as a Stage 2 formal complaint under the Imagine Wellbeing School Complaints Procedure.

Summary of the matters to be investigated

- Issue(s) raised: [summary]
- Pupil (if applicable): [name/initials]
- Outcome you are seeking: [summary]

Next steps and timescales

- I will now investigate the matters outlined above. This may include speaking with relevant staff, reviewing records and considering any associated policies/procedures.
- I will provide a written response by [date – 10 working days from receipt]. If the matter is complex and requires an extension, I will write to you before this date to explain why and confirm a revised response date (up to an additional five working days).

Access and reasonable adjustments

- If you require any reasonable adjustments to support you through this process (for example, a supported meeting, an interpreter, or information in an alternative format), please let me know, and we will make appropriate arrangements.

Safeguarding note

-
- If your complaint includes information that suggests a child may be at risk of harm, the school has a legal duty to act immediately under safeguarding procedures. This may run alongside the complaints process and, where necessary, affect timescales to protect children or preserve evidence.

Yours sincerely,

[Headteacher name]

Headteacher/Complaints Lead

Contact: [email/phone]

Template 2: Stage 2 – Formal Response / Outcome Letter

[School letterhead/email footer]

Date: [DD Month YYYY]

Ref: [Complaint reference number]

Dear [Name],

Thank you for your complaint dated [date]. I have completed my investigation and am writing to confirm the outcome.

How the complaint was investigated

- Evidence reviewed: [records/policies/logs/emails]
- People consulted: [roles only where appropriate]
- Meetings held: [date(s)] (if applicable)

Findings and decision (balance of probabilities)

1) [Issue 1]: [Upheld / Partially upheld / Not upheld]

- Summary of finding: [short explanation]
- Evidence considered: [summary]

2) [Issue 2]: [Upheld / Partially upheld / Not upheld]

- Summary of finding: [short explanation]
- Evidence considered: [summary]

Actions and remedies

- Immediate actions taken: [what has already been done]
- Planned actions and timescales:
 - [Action 1] – owner: [role], due: [date]
 - [Action 2] – owner: [role], due: [date]
- How we will monitor impact: [review meeting/date, audit, checks]

Pupil welfare and support (where applicable)

- While this complaint has been considered, we have maintained oversight of pupil wellbeing and support arrangements and will continue to do so.

Confidentiality

- Please note that we cannot share personal information about staff or other pupils. This does not affect the thoroughness of the investigation.

If you remain dissatisfied

- If you are dissatisfied with this outcome, you may request a Stage 3 review by the Proprietor. Your request should be made in writing within 10 working days of receipt of this letter and should explain which aspects remain unresolved and why.

Yours sincerely,

[Headteacher name]

Headteacher / Complaints Lead

Template 3: Stage 3 – Proprietor Review Outcome Letter

[School letterhead/email footer]

Date: [DD Month YYYY]

Ref: [Complaint reference number]

Dear [Name],

Thank you for your request dated [date] for a Stage 3 review. I have completed my review of the Stage 2 investigation and decision and set out my decision below.

Scope of the Stage 3 review

- The review considered whether the correct process was followed, whether the evidence was sufficient, and whether the Stage 2 conclusions and actions were reasonable and proportionate.

Information reviewed

- Stage 2 complaint and response
- Supporting documentation: [list]
- Any additional information provided at Stage 3: [list]

Stage 3 decision

- Decision: [confirm Stage 2 outcome OR amend outcome as follows]

Actions/recommendations

- [Action/recommendation 1] – owner: [role], due: [date]
- [Action/recommendation 2] – owner: [role], due: [date]

Next steps

- If you remain dissatisfied, you may request a Stage 4 Independent Panel Hearing within 10 working days of receipt of this letter, in accordance with the school's Complaints Procedure.

Yours sincerely,

[Proprietor name]

Proprietor

Contact: [email/phone]

Template 4: Stage 4 – Independent Panel Hearing Invitation

[School letterhead/email footer]

Date: [DD Month YYYY]

Ref: [Complaint reference number]

Dear [Name],

Thank you for your request dated [date] for an Independent Panel Hearing. I am writing to confirm the arrangements below.

Panel hearing details

- Date: [DD Month YYYY]
- Time: [time]
- Location / online link: [address/video link]
- Expected duration: [e.g., 60–90 minutes]

Panel membership

- Chair: [name/role]
- Panel member: [name/role]
- Independent panel member: [name/role] (independent of the management and running of the school)

Attendance and representation

- You may attend and may be accompanied by a friend, relative or advocate. Please confirm the name and relationship/role of any companion in advance.
- The school may be represented by: [name/role].

Documents

- A document bundle will be shared by [date]. If you wish to submit additional documents, please provide them by [date] so they can be circulated to all parties fairly.

Reasonable adjustments

- Please let us know if you require adjustments to support your participation (access needs, interpreter, additional breaks, alternative format, etc.).

Conduct

- The Chair will manage the hearing to ensure it remains respectful and focused. If behaviour becomes unsafe or abusive, the Chair may pause or end the hearing and confirm next steps in writing.

Yours sincerely,

[Proprietor name]

Proprietor / Panel Coordinator

Template 5: Stage 4 – Independent Panel Decision Letter

[School letterhead/email footer]

Date: [DD Month YYYY]

Ref: [Complaint reference number]

Dear [Name],

Following the Independent Panel Hearing held on [date], I am writing to confirm the Panel's findings, decision and any recommendations.

Panel membership

- Chair: [name/role]
- Panel member: [name/role]
- Independent panel member: [name/role]

Documents and information considered

- The complaint and previous stage responses
- The document bundle and any additional submissions
- Oral representations and questions at the hearing

Panel findings and decision

- Issue 1: [Upheld / Partially upheld / Not upheld] – [brief reason]
- Issue 2: [Upheld / Partially upheld / Not upheld] – [brief reason]
- Overall outcome: [Upheld / Partially upheld / Not upheld]

Recommendations (if any)

- [Recommendation 1]
- [Recommendation 2]

School response to recommendations

- The school will consider the Panel's recommendations carefully and will implement actions where appropriate. Where actions are agreed upon, they will be assigned to an owner and monitored for completion and impact.

Completion of internal procedure

- This letter concludes the school's internal complaints procedure. If you remain dissatisfied, you may choose to raise the matter with external bodies as set out in the policy (e.g., Ofsted / DfE), or use Bury Council's complaints routes where the concern relates to council services.

Yours sincerely,

[Panel Chair name]

Independent Panel Chair