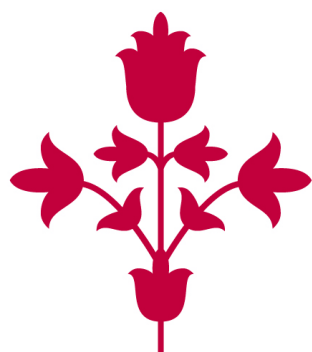




Earlscliffe



STATUTORY SCHOOL POLICY • 2026–27

Complaints Policy and Procedure

A clear, accessible and fair route for resolving concerns and learning from complaints.

Headteacher	Dr N Robinson
Deputy Headteacher	Mr L Connolly
Effective	Sept 1, 2026



Document control

Policy title	Complaints Policy and Procedure
School	Earlscliffe
Policy owner	Mr L Connolly, Deputy Headteacher
Accountable leader	Dr N Robinson, Headteacher
Approval authority	Governing Body
Version	1 - National College-aligned draft for governance approval
Prepared	Aug 18, 2026
Effective from	Sept 1, 2026
Next formal review	Before Sept 1, 2027
Applies to	Parents and carers of current pupils; pupils and boarders through the adapted routes in this policy; relevant staff, governors and proprietors

2026 COMMENCEMENT NOTE

This edition is aligned with Part 7 of the Education (Independent School Standards) Regulations 2014, Keeping Children Safe in Education 2026 and the National Minimum Standards for Boarding Schools updated May 2026. Approval should confirm the named complaint routes, panel arrangements, record system and website publication process.

Approval and review record

Control	Record
Approved by	Dr N Robinson
Approval date	01 Sept 2026
Review completed by	01 Sept 2026
Date of next review	Before Sept 1, 2027

Changes in this edition

- Leadership and ownership updated to Dr N Robinson as Headteacher and Mr L Connolly as Deputy Headteacher; Earlscliffe, & Dukes Education branding aligned with the 2026-27 policy suite.
- Cross-referenced against the National College independent-schools model and retained the strongest operational elements of Earlscliffe's 2026 policy while removing template residue, incomplete wording and outdated named contacts.
- Clarifies that the statutory three-stage route is for parents and carers of current pupils, while providing proportionate routes for pupils, boarders, former families, prospective families and third parties.
- Strengthens safeguarding triage, allegations about adults, parallel proceedings, reasonable adjustments, translation and support for international families.
- Introduces precise stage-by-stage acknowledgement, investigation, escalation, panel, outcome and extension timescales.
- Updates boarding provision to the May 2026 National Minimum Standards, including boarders' own complaints route, no detriment, identification of boarding complaints, withdrawn-complaint records and pattern review.
- Clarifies panel independence, papers, attendance, accompaniment, remote participation, fairness, findings, recommendations, remedies and finality.
- Replaces the blanket restriction on AI-assisted complaints with a fair requirement that submissions remain accurate, attributable and sufficiently clear to investigate.
- Adds complaint classification, annual reporting, equality and boarding analysis, governance assurance, a complaint form, hearing protocol, record template and pre-approval checklist.



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1. Purpose and principles

Earlscliffe is committed to high-quality education and boarding in which pupils are safe, respected and supported. Concerns and complaints are treated as a source of accountability and learning, not as an interruption to the work of the school.

This policy provides a clear, accessible and fair route for resolving dissatisfaction promptly, establishing relevant facts, giving reasons for decisions, putting matters right where appropriate and improving future practice.

- Complaints are taken seriously and handled impartially, proportionately and without avoidable delay.
- Informal resolution is encouraged but does not prevent an eligible complainant from completing the formal procedure.
- No pupil or boarder will be penalised, disadvantaged or treated less favourably because a concern or complaint has been raised in good faith.
- Decision-makers will be free from material conflict of interest and will consider the information available with an open mind.
- The school will protect confidentiality while sharing information where necessary for fairness, safeguarding, legal compliance or regulatory oversight.
- The procedure is non-adversarial. It does not determine civil liability, compensation or professional misconduct, although relevant matters may be referred to the appropriate route.

NO DETRIMENT

A complaint made honestly and in good faith must never result in retaliation against a pupil, boarder, parent, witness or person supporting them. Any concern about retaliation must be reported immediately to the Headteacher or, where appropriate, the Chair of the Governing Body or DSL.

2. Legal and regulatory framework

This policy has been drafted with regard to the following framework:

- Education and Skills Act 2008, including inspection under section 109.
- Education (Independent School Standards) Regulations 2014, Schedule 1, especially paragraph 32 on information and paragraph 33 on complaints.
- Children Act 1989 and Care Standards Act 2000, together with the National Minimum Standards for Boarding Schools updated May 2026, especially Standards 11, 13 and 14.
- Equality Act 2010, including reasonable adjustments and protection from discrimination, harassment and victimisation.
- UK General Data Protection Regulation and Data Protection Act 2018.
- Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026 where a complaint raises safeguarding issues.
- The school's parent contract and relevant Earlscliffe policies, including Safeguarding and Child Protection, Behaviour, Anti-Bullying, SEND, Data Protection, Staff Grievance, Whistleblowing and Exclusion procedures.

Where the law, statutory guidance, an inspection standard or a contractual provision changes, the school will apply the current requirement and update this policy as soon as practicable.

3. Scope and eligibility

The statutory parental procedure

The three-stage procedure required by the Independent School Standards applies to complaints from a parent or carer of a pupil currently on roll concerning the school's actions or omissions in relation to that pupil. A complaint started while the pupil is on roll may continue after the pupil leaves.

Other complainants

Earlscliffe will respond respectfully to concerns raised by pupils, boarders, former families, prospective families, visitors, educational guardians and other people directly affected by the school. The Headteacher may use this procedure, or a proportionate adaptation of it, but a person outside the statutory eligibility described above does not automatically acquire a right to a Stage 3 panel.

Matters normally handled under another route

- A pupil safeguarding concern or an allegation that an adult has harmed, may have harmed or may pose a risk to a child - Safeguarding and Child Protection procedures, including referral to children's social care, police, LADO or other agencies where required.
- Staff grievance, disciplinary, capability or whistleblowing matters - the relevant employment procedure.
- A subject access request or complaint about data rights - Data Protection procedures and, where applicable, the Information Commissioner's Office.
- A fee, debt, refund or other contractual dispute - the parent contract and the school's financial or legal process, although service-related elements may be considered under this policy.
- Admissions decisions relating only to a prospective pupil - the Admissions procedure or a proportionate response determined by the Headteacher.
- Suspension, permanent exclusion or required removal where a separate review or appeal is provided by the Behaviour Policy or parent contract.
- Public examination malpractice, access arrangements or results - the awarding body's procedure and school Examination Policy.
- A complaint that is the subject of litigation, police investigation or another statutory process - the school may pause or adapt its procedure after considering fairness, safeguarding and legal advice.

Where a submission contains several issues, the school will identify the appropriate route for each and explain how they will be coordinated. A safeguarding issue will not be delayed because other aspects are being considered as a complaint.

Anonymous and assisted submissions

Anonymous concerns will be assessed for safeguarding, safety, legal and operational risk. The school may be unable to complete a fair investigation or provide an outcome without a named contact.

A complainant may use translation, dictation, advocacy or digital tools, including generative AI, to help prepare a submission. The complainant remains responsible for ensuring that the account is accurate, represents their complaint and distinguishes fact, recollection, inference and desired outcome. The school may ask for clarification, but will not reject a complaint merely because assistance has been used.

4. Definitions and classification

Term	Meaning
Concern	An expression of worry, doubt or dissatisfaction for which reassurance, clarification or prompt informal action is sought.
Complaint	An expression of dissatisfaction, however made, about action taken or a lack of action where the complainant seeks a response, decision or remedy.
Formal complaint	A complaint stated to be under Stage 2, or one which the school reasonably treats as formal because of its seriousness, persistence or the remedy sought.
Working day	Monday to Friday when the school is open to pupils, excluding public holidays and school closure periods. The school may act during holidays where urgency, safeguarding or fairness requires it.
Upheld	The available information shows, on the balance of probabilities, that all or part of the complaint is substantiated.
Independent panel member	A person independent of the management and running of Earlscliffe and not otherwise materially connected to the matter.

A written submission will not automatically be treated as Stage 2. The school will consider its content, the complainant's stated intention and whether informal resolution is appropriate. Conversely, a repeated or serious concern may be treated as formal after the complainant has been informed.

5. Accessibility, equality and support

This policy is published on the school website and is available on request to parents of current and prospective pupils. The school will provide an alternative format or reasonable adjustment where required.

- Complaints may be raised orally at Stage 1. Staff will help a complainant record a formal complaint where disability, language, literacy or another need creates a barrier.
- Support may include accessible documents, large print, interpretation, additional processing time, remote attendance, an accessible venue, breaks, an advocate or another reasonable adjustment.
- International families and educational guardians may assist, but the school will establish who has parental responsibility or authority to act and will preserve the pupil's confidentiality.
- A child's age, maturity, communication needs, SEND, disability, language and emotional wellbeing will be considered throughout.
- A complainant should tell the School Office as early as possible what adjustment or support is requested. The school will explain any request it cannot reasonably meet and consider an alternative.

6. Safeguarding and parallel processes

Any complaint that suggests a child may be at risk of harm, that an adult may have behaved in a way that indicates they are unsuitable to work with children, or that a criminal offence may have occurred will be referred immediately to the DSL and/or Headteacher as appropriate. The Safeguarding and Child Protection Policy takes priority.

- The school may take immediate protective action without waiting for a complaint investigation.
- Information may be shared with children's social care, the police, the LADO, the Teaching Regulation Agency, DBS, the inspectorate, DfE or another competent authority where required or appropriate.
- The complaint procedure may continue, be adapted or be paused to avoid prejudicing an external investigation. The complainant will be told as much as can properly be shared.
- A complaint outcome will not disclose confidential staff action, safeguarding information about another child, or another person's special category data unless disclosure is lawful and necessary.
- Where the subject of a complaint is also a whistleblower, victim, witness or safeguarding reporter, decision-makers will take care to prevent retaliation and inappropriate disclosure.

IMMEDIATE SAFETY

A person who believes a child is in immediate danger should contact emergency services. A concern about a child's safety should also be reported to the DSL through the school's safeguarding route; it should not wait for the complaints timetable.

7. Time limits and working days

Concerns should be raised promptly and normally within three months of the event, or the most recent event in a connected series. The school will consider a later complaint where there is a reasonable explanation, safeguarding relevance, continuing impact or another good reason to do so.

If a deadline cannot reasonably be met because of school closure, witness availability, complexity, illness, safeguarding, external proceedings or the need for an independent person, the complaint handler will give the complainant a written progress update, explain the reason and provide a revised target date.

A complaint received outside a working day is treated as received on the next working day. Urgent safeguarding information is acted upon immediately regardless of term dates.

8. Roles and responsibilities

All staff

- Listen calmly, record accurately and avoid defensiveness or promises that cannot be kept.
- Resolve straightforward concerns within their authority and refer matters promptly where senior, safeguarding or specialist oversight is needed.
- Preserve relevant records and do not conduct informal enquiries that could compromise safeguarding or a fair investigation.

Headteacher

- Has overall responsibility for implementation and normally determines Stage 2 complaints.
- Appoints an investigator where appropriate and ensures that the decision is based on the evidence and gives reasons.
- Ensures remedies, learning and follow-up actions are completed.

Deputy Headteacher / DSL / Complaints Coordinator

- Maintains the central complaints record, acknowledges submissions, monitors deadlines and confirms the correct route.
- Supports reasonable adjustments, secure papers, conflict checks, communications and governance reporting.
- Does not determine a complaint where prior involvement creates a real or perceived conflict.

Governing Body and Chair

- The Governing Body assures compliance, approves the policy, monitors themes and ensures that Stage 3 panels can be convened promptly.
- The Chair, or an unconflicted nominee, handles complaints about the Headteacher and arranges an appropriate route for complaints about governors or governance.
- Governors who may sit on a panel must not investigate, advise on or prejudice the complaint.

Investigator and panel clerk

- The investigator establishes the relevant scope, evidence and findings fairly and proportionately.
- The clerk is the independent administrative contact for the panel, circulates papers, records attendance and prepares an accurate outcome record. The clerk does not determine the complaint.

9. Conduct, confidentiality and communication

All participants are expected to communicate respectfully and avoid conduct that intimidates, harasses, discriminates, threatens safety or compromises the fairness of the process. The school will not require a complainant to remain silent, but requests that confidential pupil and staff information is not published or shared unnecessarily, including on social media.

- The complaint handler will agree a main contact and communication method wherever practicable.
- Meetings may be recorded only with the prior agreement of all participants. The school may make a written note instead.
- Relevant material will be shared fairly, subject to lawful redaction, safeguarding restrictions, legal privilege and third-party confidentiality.
- The complainant may not receive details of staff disciplinary action, sanctions concerning another pupil or confidential safeguarding decisions.
- No person should approach pupils, families or staff to influence their account or retaliate for participation.

10. The three-stage procedure

Stage	Purpose	Normal lead	Target outcome
1 - Informal	Clarify, resolve and repair promptly	Relevant teacher, tutor, boarding lead or manager	Response normally within 10 working days
2 - Formal	Independent fact-finding and reasoned decision	Headteacher or unconflicted nominee	Written decision normally within 15 working days
3 - Panel	Review and, where necessary, investigate the unresolved complaint	Panel of at least three, including one independent member	Hearing normally within 20 working days; outcome within 5 working days

The school may move directly to Stage 2 where the matter is serious, where Stage 1 would be inappropriate or where the Headteacher agrees that informal work has already been exhausted. This does not remove the eligible complainant's right to request Stage 3 after receiving the Stage 2 decision.

11. Stage 1 - informal resolution

How to raise a concern

A concern should normally be raised with the person closest to the issue, such as the subject teacher, tutor, Head of Department, House Manager, boarding lead or relevant operational manager. The School Office will help identify the right person.

What happens

- The concern is acknowledged within 2 working days where it was submitted in writing or cannot be resolved immediately.
- The staff member or manager listens to the concern, checks relevant information, asks what outcome is sought and considers any immediate support or safeguarding action.
- The school may offer clarification, a meeting, corrective action, an apology for an identified failing, restoration, a review or another proportionate response.
- A written summary or response is normally provided within 10 working days. Significant Stage 1 concerns and the action taken are recorded centrally.
- If the complainant remains dissatisfied, the response explains how to submit a Stage 2 complaint and the applicable time limit.

A request to escalate should normally be made within 10 working days of the Stage 1 response. The school may accept a later request where fair and reasonable.

12. Stage 2 - formal complaint

Submission and acknowledgement

A formal complaint should be sent to the Headteacher, marked private and confidential, through the School Office. It should identify the complainant and pupil, state that Stage 2 is requested, set out the unresolved issues, provide relevant documents and explain the outcome sought. Appendix B may be used but is not compulsory.

The school will acknowledge the complaint within 3 working days, confirm the complaint handler, the issues to be investigated, the expected timetable and any adjustment or clarification required.

Investigation

- The complaint handler may investigate personally or appoint an impartial investigator with appropriate seniority and competence.
- The investigator will establish the scope, review relevant policies and contemporaneous records, speak to relevant people and give the subject of material criticism a fair opportunity to respond.
- Pupil involvement will be necessary, proportionate and welfare-led. A child will not be repeatedly interviewed merely to strengthen a complaint record.
- The standard of proof is the balance of probabilities. Findings distinguish established fact, agreed fact, disputed account, professional judgement and matters that cannot be determined.
- The school may hold a meeting with the complainant. A companion may attend for support by prior agreement; legal representation will not normally be necessary at this stage.

Decision

The Headteacher or other complaint handler will provide a written decision normally within 15 working days of receipt. It will summarise the issues considered, the steps taken, the findings on each material issue, whether the complaint is upheld in whole or part, reasons, any action that can properly be disclosed and how to request Stage 3.

A Stage 3 request should normally be made within 10 working days of the Stage 2 decision and should identify the respects in which the complainant says the response or process remains unsatisfactory. A general disagreement without reasons may be clarified before a panel is arranged, but an eligible parent will not be prevented from completing the procedure.



13. Complaints about senior leaders or governors

Complaint concerns	Stage 1 / Stage 2 route	Stage 3 arrangements
Headteacher	Chair of the Governing Body or an unconflicted nominee	Panel appointed by or on behalf of the Governing Body, with the required independent member
Individual governor	Chair or unconflicted nominee; if about the Chair, the Vice-Chair or another unconflicted governor	Panel excluding any person involved in the complaint
Chair and Vice-Chair / Governing Body collectively	Clerk to the Governing Body arranges an externally led or otherwise independent process on behalf of the proprietor	Panel appointed by an unconflicted proprietor representative, with independence safeguards recorded
Deputy Headteacher or DSL	Headteacher, unless safeguarding or conflict requires another route	Panel appointed in the usual way; safeguarding information remains protected

The person arranging the process will confirm conflicts at the outset. If the usual role-holder is unavailable or conflicted, the proprietor will nominate a suitable person and explain the arrangement to the complainant.

14. Stage 3 - panel hearing

Constitution and independence

The panel is appointed by or on behalf of the proprietor and consists of at least three people who were not directly involved in the matters complained of. At least one member is independent of the management and running of Earlscliffe. The panel selects a chair and is supported by a clerk.

Arrangements and papers

- The request is acknowledged within 3 working days and the clerk confirms the issues, arrangements and any reasonable adjustments.
- The hearing is convened as soon as practicable and normally within 20 working days of a valid request. The parties are consulted on the date but may not unreasonably delay the process.
- The complainant may attend and be accompanied by one person. Legal representation is not normally appropriate but may be allowed where fairness requires it, taking account of complexity, equality, safeguarding and the interests of the pupil.
- Remote or hybrid attendance may be used where it is fair, secure and accessible. If the complainant chooses not to attend, the panel may proceed on the written material.
- The complaint, Stage 2 response and relevant papers are circulated securely, normally at least 5 working days before the hearing. Late material is admitted only where the panel considers it fair.
- The panel may request further information, invite relevant witnesses or adjourn briefly where necessary for a full and fair consideration.

Hearing and decision

The hearing is private and inquisitorial rather than adversarial. The chair explains the procedure, confirms the issues and ensures that each party has a fair opportunity to present their account and respond to material information. Direct cross-examination is not permitted; questions are normally asked through the chair.

The panel may uphold the complaint in whole or part, not uphold it, or state that there is insufficient evidence to reach a finding on a defined issue. It may make findings and recommendations to the proprietor. Decisions are made by majority where unanimity is not possible.

The panel's findings, reasons and any recommendations are sent to the complainant within 5 working days of the hearing and, where relevant, to the person complained about, the Headteacher and the Chair of the Governing Body. A copy is available for inspection on the school premises by the proprietor and Headteacher. The Stage 3 decision completes the school's procedure.

15. Outcomes, remedies and closure

A remedy is proportionate to the identified failing and the school's lawful authority. It may include:

- An explanation, clarification or correction of inaccurate information.
- An apology for an identified failing without requiring a pupil or employee to make a compelled personal apology.
- Reconsideration of a decision by an unconflicted decision-maker.
- A practical action to restore access, communication or support.
- A review of risk assessment, reasonable adjustments, supervision, boarding practice or pupil support.
- Staff guidance, training, policy revision, process improvement or governance monitoring.
- Referral to a safeguarding, employment, examination, data protection, contractual or regulatory route.

The outcome will not normally disclose confidential disciplinary measures affecting an employee, pupil or third party. The Complaints Coordinator monitors completion of actions and records evidence of closure. A complainant may be told when an action is complete where this can lawfully be shared.

16. Pupils and boarders

Pupils and boarders may raise a concern or complaint with any trusted member of staff, including a tutor, House Manager, boarding lead, nurse, counsellor, Deputy Headteacher or DSL. Boarders also receive details of the school's independent person and external child-specific support services through induction and boarding information.

- A child may complain verbally, in writing, through an agreed digital route or with the help of a trusted adult, advocate, parent, educational guardian or independent person.
- Staff must listen, record the concern in accessible language, explain what will happen and refer safeguarding information immediately.
- The child's wishes and feelings will be considered, but confidentiality cannot be promised where information must be shared to keep someone safe.
- A boarder is not penalised for raising a complaint in good faith. Any alleged retaliation is treated seriously.
- Complaints about boarding are identified as such in the record. Complaints made and later withdrawn are still recorded, together with any necessary safeguarding or welfare action.
- The school will give the pupil feedback in a form they can understand and consider advocacy where necessary.
- Where appropriate, a parent may use the statutory three-stage route on the child's behalf. The school will consider the child's age, capacity, welfare and confidentiality when communicating with adults.

BOARDERS' VOICE

The complaint route sits alongside, and does not replace, everyday boarders' voice, access to the independent person, Childline and other support services, or the right to report a safeguarding concern directly.

17. Records, retention and data protection

The Complaints Coordinator maintains a secure written record of complaints. The record states whether the matter was resolved at Stage 1, Stage 2 or Stage 3 and records action taken by the school as a result, regardless of whether the complaint was upheld.

- Date received, complainant and pupil, eligibility, subject and classification.
- Whether the complaint concerns boarding, safeguarding, equality, SEND or another monitored theme.
- Issues, requested outcome, assigned handler, conflicts and adjustments.
- Material correspondence, meeting notes, evidence, investigation steps and decisions.
- Stage reached, findings, recommendations, remedy, owner and completion date.
- Whether the complaint was withdrawn and any action still required.
- External referrals, disclosure restrictions and the final closure date.

Correspondence, statements and records are confidential except where access is requested by the Secretary of State or an inspection body under section 109 of the Education and Skills Act 2008, where disclosure is required by law, or where sharing is necessary and lawful for safeguarding or another legitimate purpose.

Records are retained in accordance with the Records Management and Data Protection policies. Complaint records without safeguarding relevance will normally be retained for at least seven years after closure. Safeguarding material is retained in accordance with the Safeguarding and Child Protection Policy and must not be destroyed merely because the complaint record is due for review.

18. Learning, reporting and governance assurance

The Headteacher and Complaints Coordinator review complaints termly to identify recurring issues, delay, implementation gaps, equality or SEND impact, boarding themes, retaliation concerns and the effectiveness of remedies. Information is anonymised where individual identification is not necessary.

- The Governing Body receives at least annual assurance on the number and stage of complaints, timeliness, outcomes, themes, boarding complaints, withdrawn complaints and completion of actions.
- Serious safeguarding, welfare, equality, regulatory or reputational risks are escalated promptly rather than waiting for the annual report.
- The school makes available to parents and prospective parents, and on request to the Secretary of State or inspectorate, the number of complaints registered under the formal procedure during the preceding school year.
- Learning may result in policy change, staff development, boarding improvement, reasonable adjustments, pupil support, revised communications, governance action or a focused audit.
- The school reviews this policy annually and earlier following a serious complaint, statutory or regulatory change, inspection finding or material operational change.

19. Persistent or unreasonable conduct

The school distinguishes between a complaint and the conduct used to pursue it. A complainant may be persistent, distressed, forceful or dissatisfied without being unreasonable. Restrictions are used only where conduct materially hinders fair handling, places disproportionate demands on the school or threatens safety or rights.

- Refusing to identify the substance, grounds or desired outcome despite reasonable help.
- Insisting on a process that conflicts with this policy or repeatedly changing the basis of the complaint without good reason.
- Repeatedly raising a matter that has completed all stages without significant new evidence.
- Excessive, duplicative or abusive contact that prevents staff carrying out their duties.
- Threatening, discriminatory, harassing, defamatory or violent conduct.
- Knowingly providing falsified material, attempting to influence witnesses or publishing confidential information about children.
- Seeking an outcome outside the school's power, such as guaranteed disciplinary action against another person, and refusing to engage with an available lawful remedy.

Before imposing a restriction, the Headteacher or Chair will normally explain the concern, consider disability, communication need, trauma and other relevant context, invite the complainant to adjust their conduct and record reasons. A proportionate communication plan may identify one contact, one channel, reasonable response intervals and a review date. It will not block new safeguarding information or prevent completion of an eligible complaint.

Threats, violence, harassment or criminal conduct may be reported to the police and may result in restrictions on site access under a separate risk-based decision.

20. External routes and contact details

External routes

Stage 3 is the final internal stage. The Department for Education does not determine individual disputes or overturn the panel's decision, but may consider information suggesting that an independent school is not meeting the regulatory standards. Serious safeguarding concerns may be reported to local children's services or police without completing this procedure. Data protection concerns may be raised with the Information Commissioner's Office after the school has had an opportunity to respond.

Earlscliffe contacts

Route	Contact
School Office	Earlscliffe, 29 Shorncliffe Road, Folkestone, Kent CT20 2NB 01303 253951
Stage 2 formal complaint	Dr N Robinson, Headteacher - private and confidential, via the School Office
Complaint about the Headteacher / governance	Chair or Clerk to the Governing Body - private and confidential, via the School Office
Safeguarding	Mr L Connolly, Deputy Headteacher and DSL safeguarding@earlscliffe.co.uk
Department for Education	GOV.UK: Complain about a private school
Information Commissioner's Office	www.ico.org.uk
Immediate danger / suspected crime	999 in an emergency; otherwise police or local children's services as appropriate

The independent person and child-specific support contacts for boarders are provided through boarding induction and displayed in boarding accommodation. These details are checked at least termly.

Appendix A - Stage summary and timescales

Step	Complainant action	School action	Normal time
Raise concern	Contact the appropriate staff member or School Office	Acknowledge, assess risk and identify the right person	Acknowledgement within 2 working days where needed
Stage 1 outcome	Engage in informal resolution	Clarify, meet, check information and respond	Response within 10 working days
Escalate to Stage 2	Write to the Headteacher with issues, documents and outcome sought	Confirm scope, handler and timetable	Request normally within 10 working days
Stage 2	Participate in investigation and meeting where appropriate	Investigate and issue a reasoned decision	Acknowledge within 3; decision within 15 working days
Request Stage 3	Identify why the Stage 2 response remains unsatisfactory	Clerk confirms arrangements and panel	Request normally within 10 working days
Stage 3 hearing	Attend or rely on written material; may be accompanied	Panel of at least three, one independent, conducts a full and fair consideration	Hearing normally within 20 working days
Panel outcome	Receive final internal decision	Issue findings, reasons and recommendations	Within 5 working days of hearing

EXTENSIONS

Where a target cannot be met, the school will provide a reasoned progress update and a revised date. Safeguarding action is never delayed by these timescales.

Appendix B - Formal complaint / panel request form

Use of this form is optional. A complaint in any clear written format will be accepted.

Field	Information
Complainant name	
Pupil name and relationship	
Email, telephone and address	
Stage requested	Stage 2 formal complaint / Stage 3 panel request
What happened? Include dates, people and locations.	
What has already been done to resolve it?	
Which issues remain unresolved?	
What outcome are you seeking?	
Documents attached	
Accessibility, language or support requested	
Declaration	I confirm that this account is accurate to the best of my knowledge and represents the complaint I wish the school to consider.
Signature and date	

Appendix C - Panel hearing protocol

Before the hearing

- Clerk confirms eligibility, request, issues, conflicts, panel membership, independent member and adjustments.
- Parties receive the procedure, date, attendance arrangements and papers securely.
- Panel members declare any connection to the school, parties or matters and the clerk records the independence assessment.
- The chair identifies any further information needed and decides how sensitive pupil or safeguarding information will be protected.

Indicative order

- Chair's introduction, confidentiality reminder and confirmation of the issues.
- Complainant's account and questions through the chair.
- School's account and questions through the chair.
- Relevant witnesses or further evidence, where the panel has agreed this is necessary.
- Final points from the complainant and school.
- Private panel deliberation, findings on each issue and recommendations.

Fairness safeguards

- No panel member has been directly involved in the matters complained of.
- At least one member is independent of the management and running of the school.
- Each side sees and can respond to material information, subject to lawful restrictions.
- The process is child-centred, proportionate and avoids repeated or hostile questioning.
- The outcome gives intelligible reasons and identifies any recommendation, owner and review need.



Appendix D - Complaint record and annual analysis

Individual record fields

Record field	Entry
Reference / date received	
Complainant / pupil	
Eligibility and stage	
Summary and issues	
Boarding-related?	Yes / No - details
Safeguarding / equality / SEND flag	
Handler / investigator / conflict check	
Adjustments and support	
Key dates and evidence	
Findings and outcome	
Action taken regardless of outcome	
Withdrawn?	Yes / No - action still required
Closure and retention review	

Annual governance analysis

- Number at each stage and number completed within target time.
- Number and themes of formal complaints in the preceding school year.
- Boarding complaints, withdrawn boarding complaints and boarder feedback.
- Safeguarding, SEND, equality and protected-characteristic themes, with appropriate anonymisation.
- Repeat issues, high-risk cases, remedies, overdue actions and assurance that retaliation has not occurred.
- Policy, training, staffing, boarding or operational changes arising from complaints.

Appendix E - Source register and implementation checklist

Primary framework reviewed

- Education (Independent School Standards) Regulations 2014, Schedule 1, paragraphs 32 and 33 - legislation.gov.uk.
- Education and Skills Act 2008, including section 109 inspection access.
- National Minimum Standards for Boarding Schools, Department for Education, updated May 2026 - especially Standards 11, 13 and 14 and Appendix B records.
- Keeping Children Safe in Education 2026 - comes into force Sept 1, 2026.
- Equality Act 2010; UK GDPR; Data Protection Act 2018.
- GOV.UK: Complain about a school - private schools; Independent Schools Inspectorate: Raising a concern about a school.
- The National College Complaints Procedures Policy for Independent Schools - used as a structural benchmark with Earlscliffe-specific adaptation.
- Earlscliffe Complaints Policy and Procedures dated Feb / Apr 2026 - reviewed and superseded by this edition.

APPROVAL STATUS

This appendix is an implementation aid. Governance approval should not be recorded until each required action is complete or has a named owner and completion date.

Implementation sign-off

Implementation control	Sign-off record
Governance and panel arrangements	Owner: _____ Complete / due: _____
Complaint register and templates	Owner: _____ Complete / due: _____
Website and annual-number publication	Owner: _____ Complete / due: _____
Pupil and boarding routes	Owner: _____ Complete / due: _____
Staff briefing and linked-policy alignment	Owner: _____ Complete / due: _____
Governance conditions closed	Confirmed by: _____ Date: _____

Reviewed against The National College model policy and current primary guidance. Earlscliffe-specific operational decisions remain the responsibility of the Headteacher and Governing Body.