

Complaints and Concerns Policy and Process

Publication Date	20/03/2025
Version Number	1.2
Policy Owner	CEO
Approval Level (Panel)	FR&S Trust Board
Applies To (job roles relevant to)	ALL
Next Review Due	20/03/2026
Equality Impact Assessment	

Policy Purpose:

- To assist the resolution of issues effectively
- Ensure the Trust has a consistent approach when handling Complaints/Concerns
- Demonstrate a high level of professionalism when dealing with Complaints/Concerns.
- Monitor the quality of service of the Trust's delivery and identify areas of concern
- Identify serious concerns such as abuse or safeguarding issues
- Highlight key areas where the Trust's provision and delivery of education needs improvement
- Provide valuable insights into staff training to improve the delivery of the Trust's education provision.
- Allow a complaint or concern to be made, recorded and dealt with effectively
- Inform stakeholders how a complaint can be made or concern raised and help them understand the procedure

Who can make a complaint or raise a concern?

This complaint/concerns procedure is open for all persons who wish to make a complaint or raise a concern to the Trust (including our education settings directly). It is not limited to students, parents or carers of students that are registered at either of the colleges run by the Trust. Any person, including members of the public, may make a complaint or raise a concern to the Lighthouse Learning Trust about any provision of facilities or services that we provide. Unless complaints/concerns are dealt with under separate statutory procedures (such as appeals relating to exclusions or admissions), we will use this complaints/concerns procedure.

The difference between a concern and a complaint

A concern may be defined as *'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.'*

A complaint may be defined as *'an expression of dissatisfaction however made, about actions taken or a lack of action.'*

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Lighthouse Learning Trust takes complaints and concerns seriously and will make every effort to resolve the matter as quickly as possible.

How to raise a concern or make a complaint

All complaints and concerns should be submitted through the Complaints, Concerns and Compliments (CCC) form which is available on ALL Trust platforms both internal and externally. If someone makes a complaint or raises a concern in person or by phone the person spoken to must complete a CCC form on their behalf. Complaints and concerns received by email or letter will be input into the CCC form on their behalf.

A link to the CCC form is attached to the end of this document.

In accordance with equality law, we will consider making reasonable adjustments if required, to enable complainants to access and complete this Complaints, Concerns and Compliments form. For instance, providing a paper copy of the form or providing appropriate support to complete it.

The form is the mechanism by which the Trust monitors and audits the speed and satisfaction rates in dealing with concerns and complaints received by the Trust.

On submission of the Concern, Complaint or Compliment form an acknowledgement of receipt will be issued to the complainant. This will be accompanied by a link to the Trust complaint Policy and Procedure.

Anonymous complaints and concerns

We will accept anonymous complaints and concerns; however, the Executive Principal/CEO will determine whether they warrant an investigation. All safeguarding concerns will be investigated.

Time scales

Complaints should be raised within three months of the incident or, where a series of associated incidents have occurred and within three months of the last of these incidents. We will consider complaints and concerns made outside of this period if exceptional circumstances apply.

Scope of this Complaint/Concerns procedure

This procedure covers all complaints/concerns about any provision of community facilities or services by Lighthouse Learning Trust, other than those that are dealt with under other statutory procedures, including those listed below. The Trust will advise the complainant if one of these procedures is instigated.

Exceptions	Who to contact
<ul style="list-style-type: none"> Admissions to College 	Concerns about admissions will be handled through a separate process – through the appeals process.
<ul style="list-style-type: none"> Matters likely to require a Child Protection Investigation 	<p>Complaints about child protection matters are handled under our Child Protection and Safeguarding Policy and in accordance with relevant statutory guidance.</p> <p>If you have serious concerns, you may wish to contact the local authority designated officer (LADO who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH.</p> <p>LADO Phone number: 01962 876364 MASH Phone number: 0300 555 1384</p>
<ul style="list-style-type: none"> Whistleblowing 	We have an internal whistleblowing procedure for all our employees, including temporary staff and contractors.
<ul style="list-style-type: none"> Staff grievances 	Complaints from staff will be dealt with under the college's internal grievance procedures.
<ul style="list-style-type: none"> Staff conduct 	Complaints about staff will be dealt with under the colleges' internal disciplinary procedures, if appropriate.

	Complainants will not be informed of any disciplinary action taken against a staff member because of a complaint. However, the complainant will be notified that the matter is being addressed.
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If a complainant commences legal action against Lighthouse Learning Trust in relation to their complaint, we will consider whether to suspend the complaints procedure until those legal proceedings have concluded.

Resolving complaints/concerns

At each Level in the procedure, Lighthouse Learning Trust wants to resolve the complaint/concern. If appropriate, we will acknowledge that the complaint/concern is upheld in whole or in part. In addition, we may offer one or more of the following:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that we will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review college policies in light of the complaint/concern
- an apology.

Withdrawal of a complaint/concern.

If a complainant wants to withdraw their complaint or concern, we will ask them to confirm this in writing.

Procedure

Roles and Responsibilities

Customer Service Manager – Trust EA/PA or QA&C Manager

Complaint Manager – Team/department manager for area of the business that the Level 1 complaint/concern applies

Executive Principal and CEO – Oversee all level 2 Complaints and level 1 Appeals that escalate to Level 2 (see exception below)

On receipt, the completed CCC form will be reviewed by appointed Customer Service Managers of the Complaints and Concerns process. They will assess who is the most appropriate person within the Trust to manage the complaint or concern and assign a grading level accordingly.

Most complaints and concerns in the first instance, will be directed to the person closest to the source of the issue, for example the class teacher or relevant manager. That person will seek to resolve matters in accordance with the principles of this policy. These complaints and concerns are termed Level 1.

Some concerns and complaints will be of a significant level of risk or seriousness. These types of concerns and complaints will be directed to the Executive Principal or CEO in the first instance and are termed Level 2. If the Executive Principal or CEO considers that this could be dealt with at level 1 they can redirect it through the CSM to reallocate at Level 1.

In addition, if a Level 1 complaint or concern is resolved but the complainant is not satisfied with the resolution and appeals, this is escalated to Level 2.

Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis and it may also prevent them from considering complaints at Level 3 of the procedure.

Level 1 – Complaints or Concerns

The Customer Service Manager on deciding a complaint or concern is Level 1 will forward details of the complaint to person they deem most appropriate to manage it. If on receipt of the details that person accepts responsibility to manage the complaint/concern they become the Complaint Manager. If the recipient feels that the complaint/concern is more appropriate for another individual they can return it to the Customer Service Manager with explanation. The Customer Service Manager can then reassign the complaint.

Once a complaint/concern is accepted the Manager of the Complaint/Concern sends a communication (within 5 working days) to the complainant outlining the period for resolution and the name of the person who will review the complaint.

The person managing the complaint has 15 working days to investigate the complaint and send a response to the complainant.

If for any reason, there is reason that this target cannot be achieved it is the responsibility of the complaint/concern manager to keep the complainant, and the Customer Service Manager, informed of the reason and the extended expected date of response. In instances where this occurs the Executive Principal/CEO is made aware.

At conclusion of the review of the complaint/concern the Manager of the Complaint should send a response to the Complainant and log the complaint as completed. This will generate the issue of a feedback form with information relating to appeals.

If the Complainant is unhappy with the outcome of the Level 1 resolution, they have 10 working days to appeal. Appeals are escalated to Level 2.

Level 2 – Complaints or Concerns

Level 2 complaints/concerns are directed by the Customer Service Manager to the Executive Principal/ or the CEO as appropriate. If the Executive Principal/CEO feel that the complaint/concern is more appropriate to be dealt with at Level 1 they can return it to the Customer Service Manager with explanation. The Customer Service Manager can then reassign the complaint/concern.

If the complaint/concern is about the Executive Principal or CEO the Customer Service Manager will contact members of the Trust Executive Team requesting their decision which suitably skilled Governor/Trustee will be appointed to complete all the actions at Level 2. Level 2 stages of this procedure citing the Executive Principle/CEO actions apply to that individual.

On accepting the Level 2 complaint/concern, The Executive Principal/CEO has 5 working days to send a communication to the complainant outlining the period for resolution and advising they themselves will conduct the review.

In the case of Stage 1 Appeals, the Executive Principal/CEO will seek to clarify the nature of the appeal, ask what remains unresolved and what outcome the complainant would like to see.

The Executive Principal/CEO can consider whether a face-to-face meeting is the most appropriate way of doing this.

Note: The Executive Principal/CEO may delegate the investigation to another member of the college's senior leadership team but not the decision to be taken.

During the investigation, the Executive Principal/CEO (or investigator) will:

- if necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish
- keep a written record of any meetings/interviews in relation to their investigation.

At the conclusion of their investigation, the Executive Principal/CEO will provide a formal written response within 15 working days of the date of receipt of the complaint/concern.

If the Executive Principal/CEO is unable to meet this deadline, they will provide the Complainant with an update and revised response date.

The response will detail any actions taken to investigate the complaint/concern and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions The Lighthouse Learning Trust will take to resolve the complaint/concern.

At conclusion of the review of the complaint/concern the Executive Principle /CEO will send their response to the complainant and log the complaint/concern as completed. This will generate the issue of a feedback form with information relating to appeals.

Level 3 – Appeals Panel Hearing

If the complainant is dissatisfied with the outcome at Level 2 and wishes to take the matter further, they can appeal, as stated above. An appeal must be made within 10 working days of receipt of the Level 2 response. Requests received outside of this period will only be considered if exceptional circumstances apply.

The appeal will be managed under Level 3.

Level 3 involves a Panel hearing with a minimum of two members who were not directly involved in the complaint/concern. This will be facilitated by the Customer Service Manager. The Panel will typically include members of the Trust Executive Team and one independent member who is not involved in the college's day-to-day management and operations. This is the final stage of this procedure.

The Customer Service manager will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 15 working days of receipt of the Level 3 Appeal. If this is not possible, the Customer Service manager will provide an anticipated date and keep the complainant informed.

If the complaint/concern is:

- jointly about the Chair and Vice Chair or
- the entire Governing body or
- the majority of the Governing body

Level 3 will be heard by the Trustees and an independent Panel member.

A complainant may bring someone along to the Panel meeting to provide support. This can be a relative or friend. We do not encourage either party to bring legal representatives to the Panel meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a Trust employee is called as a witness in a complaint/concern meeting, they may wish to be supported by union and/or legal representation.

Note: Complaints about staff conduct will not be handled under this complaint's procedure. Complainants will be advised that any staff conduct complaints will be considered under (Human Resources) staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 5 working days before the meeting, the Customer Services manager will:

- confirm and notify the complainant of the date, time, and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the Panel at least 5 working days before the meeting.

Any written material will be circulated to all parties at least 3 working days before the date of the meeting. The Panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The Panel will also not review any new complaints/concerns at this level or consider evidence unrelated to the initial complaint/concern to be included. New complaints/concerns must be dealt with from Level 1 of the procedure.

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The Panel will consider the complaint/concern, and all the evidence presented. The Panel can:

- uphold the complaint/concern in whole or in part
- dismiss the complaint/concern in whole or in part.

If the complaint/concern is upheld in whole or in part, the Panel will:

- decide on the appropriate action to be taken to resolve the complaint/concern.
- where appropriate, recommend changes to the Trust's systems or procedures to prevent similar issues in the future.

The Chair of the Panel, elected by members of the panel, will provide the complainant and Lighthouse Learning Trust with a full explanation of their decision and the reason(s) for it, in writing, within 5 working days.

The letter to the complainant will include details of how to contact the Education and Skills Funding Agency (ESFA) if they are dissatisfied with the way their complaint/concern has been handled by The Lighthouse Learning Trust.

The response will detail any actions taken to investigate the complaint/concern and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions Lighthouse Learning Trust will take to resolve the complaint/concern.

The Panel will ensure that those findings and recommendations are sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about.

A written record will be kept of all complaints and concerns, and of whether they are resolved at the preliminary Level or proceed to a Panel hearing, along with what actions have been taken, regardless of the decision.

All correspondence statements and records relating to individual complaints/concerns will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

Complaints/concerns about Governors/Trustees/Members

If the complaint/concern relates to a Trustee/ Governor or Member, the complaint/concern should be investigated by the Chair of the Trust Board. If a complaint/concern is received about the Chair, this will be referred to the Vice Chair for investigation.

NB. Where the Chair of the Trust Board has investigated the complaint/concern, they will write the letter of outcome to the Complainant and provide a copy to the CEO.

If the complaint/concern is:

- jointly about the Chair and Vice Chair or
- the entire Trust Board or
- the majority of the Trust Board

The complaint/concern will be heard by a completely independent Panel.

The Complaint Panel will consist of three members. None of the three members of the Complaint Panel will have been involved in the incidents or events which led to the complaint/concern or have been involved in dealing with the complaint/concern in the previous Levels, or have any detailed prior knowledge of the complaint/concern.

One of the Complaint Panel members will be independent of the management and running of the Academy Trust. This means that the independent Complaint Panel member will not be a Trustee or an employee of the Trust.

A complainant may bring someone along to the Panel meeting to provide support. This can be a relative or friend. We do not encourage either party to bring legal representatives to the Panel meeting. However, there may be occasions when legal representation is appropriate.

For instance, if a Trust employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

Note: Complaints about staff conduct will not be handled under this complaint's procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 5 working days before the meeting, the Customer Service manager will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the Panel at least 5 working days before the meeting.

Any written material will be circulated to all parties at least 3 working days before the date of the meeting. The Panel will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The Panel will also not review any new complaints/concerns at this Level or consider evidence unrelated to the initial complaint/concern to be included. New complaints/concerns must be dealt with from Level 1 of the procedure.

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The Panel will consider the complaint/concern, and all the evidence presented. The Panel can:

- uphold the complaint/concern in whole or in part
- dismiss the complaint/concern in whole or in part.

If the complaint/concern is upheld in whole or in part, the Panel will:

- decide on the appropriate action to be taken to resolve the complaint/concern
- where appropriate, recommend changes to the working's systems or procedures to prevent similar issues in the future.

The Chair of the Panel will provide the complainant and Lighthouse Learning Trust with a full explanation of their decision and the reason(s) for it, in writing, within 5 working days.

The letter to the complainant will include details of how to contact the Education and Skills Funding Agency (ESFA) if they are dissatisfied with the way their complaint/concern has been handled by the Lighthouse Learning Trust.

The response will detail any actions taken to investigate the complaint/concern and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions Lighthouse Learning Trust will take to resolve the complaint/concern.

The Panel will ensure that those findings and recommendations are sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about.

All correspondence statements and records relating to individual complaints/concerns will be kept confidential, except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

Next Steps

If the complainant believes the Trust did not handle their complaint/concern in accordance with the published complaints/concerns procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the ESFA after they have completed Level 3.

The ESFA will not normally reinvestigate the substance of complaints/concern or overturn any decisions made by Lighthouse Learning Trust. They will consider whether Lighthouse Learning Trust has adhered to education legislation and any statutory policies connected with the complaint/concern and whether they have followed [Part 7 of the Education \(Independent School Standards\) Regulations 2014](#).

The complainant can refer their complaint/concern to the ESFA online at: www.education.gov.uk/contactus, by telephone on: 0370 000 2288 or by writing to:

Academy Complaints and Customer Insight Unit
Education and Skills Funding Agency
Cheylesmore House
5 Quinton Road
Coventry
CV1 2WT

Version	Purpose/Change	Author	Date
1.1	New document	TGO	June 24
1.2	New Procedure	TGO	February 25