Thomas Telford Multi Academy Trust

Concerns and Complaints Policy

Redhill Primary Academy

and

Thomas Telford Primary Free School

Signed

Mrs Raj Samra
Chair of Governors
September 2026

All academies and trusts must have a complaints procedure, which must meet the requirements in the standard at the Education (Independent School Standards (England) Regulations 2014 Schedule 1, Part 7.

Introduction

This Concerns and Complaints Policy is available in individual form on each website of the schools in Thomas Telford Multi Academy Trust ("TTMAT"). It is for use by parents/carers who have students on the enrolment at TTMAT schools. Details of each school (hereafter referred to as "Academy", including other schools of another status. i.e., UTC, Free School) which fall under the responsibility of TTMAT can be found on its website **www.ttmat.net**

A separate policy exists for members of the community who are not parents/carers of students at a TTMAT Academy, and each Academy publishes this via its website.

This policy provides:

- An opportunity to resolve a complaint with the Academy on an informal basis, for example through discussion with a senior member of staff
- A formal complaint stage where a complaint is made in writing
- A hearing with a panel appointed by or on behalf of the Local Governing Board
- A hearing with a panel appointed by TTMAT

The exceptions to this requirement are complaints relating to the Curriculum, Collective Worship and Religious Education; some Special Educational Needs issues and Admission issues; and others where Local Authorities have statutory responsibilities, such as Safeguarding. The Headteacher or Concerns & Complaints Officer at each Academy can give information and advice about complaints in these areas.

There are certain other complaints which fall outside the remit of the Local Governing Board's complaints procedure; for example, staff grievances or disciplinary procedures which are dealt with under separate policies. Any complaints concerning the conduct of Academy staff will be handled in accordance with the Academy's internal disciplinary procedures. The details of such an internal investigation will remain confidential.

Allegations of abuse involving a member of Academy staff must be reported to the Headteacher immediately. Allegations of abuse involving the Headteacher must be reported to the Chair of the Local Governing Board immediately.

TTMAT and the Academy reserves the right to seek external advice and support at any time that it is considered necessary or appropriate in respect of either a complaint or concern.

The Headteacher provides the Local Governing Board with a termly report outlining matters of concern or complaint which have been satisfactorily resolved in line with this policy.

The Academy's Concerns & Complaints Officer for Redhill Primary Academy is Zara Bate, telephone 01952 327170, and Fay Hurford for Thomas Telford Primary Free School, Fay Hurford, 01952 446525.

Concerns are matters that can usually be resolved informally; if a concern is not resolved then the complainant will have the opportunity to put the complaint in writing and the formal complaint procedure will then be engaged. It is in everyone's interest that matters are resolved at the earliest possible stage. The experience of the first contact is crucial in determining whether the concern will escalate. Complaints are processed on school days. This means that a complaint received during any school holiday or professional development day will be deemed to have been received on the

first school day after the holiday period has ended. There might be exceptional circumstances when a matter is dealt with sooner.

Stage 1 Concerns (Meeting with Teacher, Personal Tutor, Head of Department or Year Manager)

- As soon as a concern is registered with the Academy either, verbally in person, via email, in writing, or by telephone, a meeting with the person registering the concern will be offered and if accepted convened within **5 school days**
- If a meeting is not required by the person registering the concern an option of telephone feedback will be offered
- A concern will normally be heard or dealt with by a Teacher, Personal Tutor, Head of Department or Year Manager
- The outcome of the concern will be recorded in the pastoral log and feedback provided to the person registering the concern within **2 school days** of receiving the concern
- If the concern is not resolved satisfactorily, it may be treated as a complaint
- All complaints **must** be in writing

Stage 2 Formal Complaint (Meeting with Deputy Head or Head of School)

- Complaint received in writing
- A meeting will be convened with the complainant within **5 school days**
- The complaint will normally be heard by a Senior Staff member such as a Deputy Head
- The outcome of hearing the complaint will be recorded in a letter which will be sent to the complainant within **2 school days** and the Academy will retain a copy for its records
- If the complainant is not satisfied with the outcome, then he/she should indicate the reasons in writing within **5 school days after receiving the letter** to the Headteacher

Stage 3 Formal Complaint (Meeting with Headteacher)

- Complaint received in writing indicating why the complainant is not satisfied with the outcome of Stages 1 and 2
- A meeting will be convened with the complainant within **5 school days**
- The complaint will be heard by the Headteacher
- The outcome of the complaint will be recorded in a letter which will be sent to the complainant within **2 school days** and the Academy will retain a copy for its records
- If the complainant is not satisfied with the outcome, then he/she should indicate the reasons in writing within **5 school days after receiving the letter** to the Chair of the Local Governing Board

Stage 4 Formal Complaint (Meeting with a Panel of Governors)

- The Chair of the Local Governing Board receives a complaint in writing indicating why the complainant is not satisfied with Stages 1, 2 and 3
- The Chair of the Local Governing Board will organise a Panel of three Governors to hear the complaint which may or may not include the Chair
- A meeting will be convened within **10 school days**
- The Panel will hear the complaint
- Parents can attend and be accompanied at the Panel Hearing if they wish
- The outcome of the complaint and recommendations will be recorded in a letter which will be sent to the complainant within **2 school days** and the Academy will keep a copy for its records

Stage 5 Appeal to TTMAT Panel (Meeting with the Chair, or their designated representative, plus one other Trustee and a member who is independent of the management and running of the Academy)

- As TTMAT is legally responsible for the Redhill Primary Academy and Thomas Telford Primary Free School, the Panel will consider all documentation to determine whether or not a final meeting is required to hear an appeal against the decisions which have been reached at the earlier stages of this process

- TTMAT may seek legal advice if necessary
- Members of the Appeal Panel will not have been involved with any aspect of the complaint at any stage
- If a meeting is required, all reasonable steps will be taken to try to ensure that this is convened within **10 school days**
- The outcome of the appeal will be recorded in a letter which will be sent to the complainant within **2 school days** after the Appeal Hearing, or earlier if the Appeal Panel decides that there are no grounds for an appeal. The Academy will keep a copy for its records

If the complainant is not satisfied with the handling of their complaint, then he/she has recourse to the DfE **(Details on page 4 – under Additional Notes)** or an appropriate third party.

Please note that a written record of all complaints is kept confidential.

If, without good reason, the complainant does not accept one of up to three meeting dates which are proposed at each stage of the process, the meeting will proceed in the complainant's absence and on the basis of the written submissions which have been received from all parties.

Concerns or complaints specifically about the Headteacher:

A decision that the Headteacher has made as a result of a Level 3 complaint does not become a complaint about the Headteacher. If the complainant feels the complaint has not been resolved satisfactorily, they should proceed to Stage 4, a Governors' Complaints Panel.

If the concern or complaint is specifically about the Headteacher and is not resolved at Stages 1-3, then it will be necessary for the complainant to proceed to Stage 4 and formally complain to the Chair of the Local Governing Board. The complainant should write to him or her at the Academy address marking the envelope "Confidential". The Chair of the Local Governing Board should acknowledge the complainant's letter in writing within 5 school days of receipt and decide on what action should be taken. In the event that the Chair of the Local Governing Board is not available within the stated time period the Concerns & Complaints Officer will refer to TTMAT the Executive Advisor for guidance.

Additional Notes:

The Academy staff and Governors will always work with parents to try and secure a satisfactory outcome following a complaint. However, there may be occasions when the expertise within the Academy is not able or sufficiently knowledgeable to deal with a specific complaint. In such rare cases the Academy reserves the right to refer complaints to experts in chosen fields at any of the three stages in the process including the Executive Advisor. Any such third parties may then respond to the complainant on the Academy's behalf if requested to do so.

In circumstances where the nature and extent of a complaint are unusually complex, the Academy also reserves the right to amend the timescales used in the complaints procedure to ensure that adequate time is made available to try and resolve the complaint satisfactorily.

Part of the Concerns and Complaints Officer's role is to assist the complainant in the process and the complainant should feel free to take advice, as appropriate, from the Concerns and Complaints Officer at any time during school hours.

Correspondence sent by post will be deemed to have been received the day after posting when sent by first class post or two days after posting when sent by second class post. Letters may be attached to email correspondence for expediency and efficiency.

Parents/carers that are not satisfied about the handling of their complaint have recourse to the DfE via: https://www.gov.uk/complain-about-school

Collecting Evidence

Any recorded telephone or video images (CCTV) or photographic evidence collected as part of investigations will be processed fairly and lawfully in accordance with General Data Protection Regulation 2018 (GDPR) as far as it will be:

- Adequate, relevant, and not excessive
- Used for the purposes(s) stated in this policy only and not used for any other purposes
- Accessible only by the senior member of staff conducting the investigation and after securing permission from the Headteacher
- Treated confidentially
- Stored securely

Data collected by use of CCTV may be used for prevention and detection of crime, staff disciplinary and student behaviour, discipline and exclusions as required.

Data may be stored and viewed from the CCTV provider, or downloaded onto other digital platforms, which may include, but are not exclusively, portable storage devices, laptops, Academy servers. It may be shared with Academy staff, used as evidence in tribunal or exclusion proceedings and may be shared with third party agencies such as the Police, the Local Authority, or Social Care, subject to internal Data Protections processes.

The Remit of the Governors' Complaints Panel and others dealing with complaints under this policy

Whilst the procedures for hearing complaints involve a formal process, and meetings are held in private, every effort will be made to allow the proceedings to be as informal and constructive as possible, focusing on resolution of the complaint to everyone's satisfaction. All parties will be expected to act with respect, courtesy, understanding and tolerance, particularly if a child is in attendance.

All parties at the meetings will have access to the same documentation which, as far as is possible, will be distributed in good time before the meeting date. All parties will have the opportunity to state their case or position and to ask questions. On occasions, there might be an adjournment of proceedings to provide time for reflection, private discussion or the comfort and wellbeing of attendees etc. The aim will, however, be to resolve all matters at a single meeting. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. The prior knowledge and consent of all parties attending must be sought before electronic recordings of meetings take place.

The remit of those hearing complaints will not involve reviewing any new complaints or considering evidence which is unrelated to the complaint. Any further concerns which the complainant might have should be progressed in accordance with Stage 1 of this policy.

Options available for those dealing with complaints:

- dismiss the complaint in whole or in part
- uphold the complaint in whole or in part
- decide on the appropriate action to be taken to resolve the complaint
- recommend changes to the Academy's systems or procedures to ensure that problems of a similar nature do not recur

The Concerns and Complaints Officer will remain the contact point for the complainant and will set the date, time, and venue of the hearing, ensuring that the dates are convenient to all parties and that the venue and proceedings are accessible.

The Clerk to the Governors, or another suitable person, will attend the Panel and Appeals meetings to make a procedural record of the meetings

A template, **Appendix A**, is attached to assist the complainant if they wish at any stage of the process.

Data Usage Access Act 2025 - Complaint Process Appendix

Introduction

Redhill Primary Academy/Thomas Telford Primary Free School are committed to protecting the privacy and personal data of its students, staff, parents/carers, governors and the wider school community. This policy outlines the procedure for handling complaints related to data usage and access, in accordance with the Data Usage Access Act (DUAA) and other relevant UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

The UK GDPR documents as set out on our website provide an overview of how personal data is managed across our settings.

This is an appendix to the main complaint policy and reflects the requirement for standalone data usage complaints to be handled using a separate procedure. Any complaint that is linked to other matters whether raised as a formal or informal complaint are to be dealt with under the standard complaint process as outlined within the main complaint policy.

Roles and responsibilities

The Data Controller (DC) is responsible for ensuring compliance with this policy and the legal obligations imposed by the UK GDPR, Data Protection Act 2018, Data Usage and Access Act 2025 and other relevant legislation. The DC will delegate day to day management of this to the relevant staff member and the DC will expect that staff member to investigate any complaint unless there is a conflict of interest, in which case the DC will appoint a suitable person.

The headteacher and leadership team are responsible for ensuring all staff are aware of this policy and their data protection obligations.

All staff members are responsible for handling personal data in a secure and lawful manner and for co-operating fully with any investigation into a data usage or access complaint.

Scope

This policy applies to all individuals who have dealings with the Schools and believe that their personal data has been used or accessed inappropriately, or that their rights under the DUAA and other data protection laws have been infringed.

This includes but is not limited to:

- current and former students
- parents/carers
- school staff (teaching, support, and administrative)
- governors
- volunteers
- contractors and suppliers

Principles

Fairness and transparency: All complaints will be handled in a fair, impartial, and transparent manner.
Confidentiality: Complaints and all related information will be treated with the utmost confidentiality, unless disclosure is required by law.
Timeliness: Complaints will be acknowledged and investigated in a prompt manner.
Compliance: All actions taken will comply with the DUAA, UK GDPR, DPA 2018, and other relevant legislation.

The complaint procedure

Step 1: Informal resolution

We encourage individuals to first attempt an informal resolution of their concerns. If you have a concern about data usage or access, you should, in the first instance, raise it with the office manager at the school.

In many cases, issues can be resolved quickly and informally at this stage.

Step 2: Formal complaint submission

If the informal approach is not successful or deemed inappropriate, a formal complaint should be submitted in writing using the complaint form attached.

The complaint should be addressed to Headteacher/Head of Schol

The written complaint should be made on the form provided.

Step 3: Acknowledgment and investigation

You will receive an acknowledgment of the written complaint within 5 working days of the setting receiving it.

The DC will conduct a thorough and impartial investigation into the complaint.
This may involve:

- interviewing the complainant
- interviewing relevant staff members
- reviewing school records, logs, and policies
- consulting with external legal or data protection experts if necessary

The schools will aim to complete the investigation and provide a substantive response within 20 working days of the complaint's acknowledgment. If the investigation is complex and requires more time, the DC will write to the complainant to explain the reason for the delay and provide a new estimated completion date.

Response

The DC will provide a formal written response to the complainant.
This response will include:

- the findings of the investigation.
- a clear and reasoned conclusion as to whether the DUAA or other data protection laws have been breached.
- details of any corrective action taken or planned to prevent a recurrence of the issue.
- the outcome of the complaint, including whether it has been upheld, partially upheld, or not upheld.
- information on the next steps available to the complainant if they remain dissatisfied.

Escalation

If the complainant is not satisfied with the school's final response, they have the right to escalate their complaint to the Information Commissioner's Office (ICO).
The ICO's contact details are as follows:

Website: https://ico.org.uk
Telephone: 0303 123 1113
Postal Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Policy Review

This policy will be reviewed annually by the Data Protection Officer and the school leadership team to ensure it remains relevant, effective, and compliant with all current legislation.
Date of implementation: 01 September 2025
Review date: 01 September 2026

GDPR Statement

Data will be processed to be in line with our requirements and protections set out in the UK General Data Protection Regulation, Data Protection Act as amended by the Data (Use and Access) Act 2025.

Data Usage Access Act 2025 – Complaint Form

To be completed by the complainant

Please return this form to Redhill Primary Academy/Thomas Telford Primary Free School

Part 1: Complainant's Details

Please provide your full contact information so we can communicate with you regarding your complaint.

Full Name:	
Relationship to the School: (e.g. student, parent/carer, staff member, former student, volunteer, contractor)	
If student:	
year group:	
form/class:	
If parent/carer:	
student's full name:	
student's year group:	
Contact telephone number:	
Email address:	
Postal address:	
Preferred method of contact: (e.g. email, phone or post)	

Part 2: Details of the complaint

Please provide a clear and concise description of your complaint.

Date(s) of the incident(s)	
When did the misuse occur or when did you become aware of it?	
Nature of the complaint	
Please tick all that apply and provide details below:	
Unauthorised access to personal data	
Unauthorised disclosure of personal data	
Incorrect or inaccurate personal data	
Unlawful processing or use of personal data	
Failure to respond to a data subject request e.g. Subject Access Request or Right to Erasure	
Other (please specify)	
Description of the incident(s)	

What happened? Provide a detailed narrative of the events.	
Who do you believe was involved? e.g. specific staff member, department, external party	
What personal data was involved? e.g. name, address, medical information, academic records, disciplinary records, financial details, sensitive personal data	
How do you believe your data was misused or accessed inappropriately?	
Where did the incident occur (if applicable)	
Has there been any previous attempts to resolve this issue informally? e.g. discussed with a teacher, GDPR lead, head of department.	**Yes or No**
If yes, please provide details of who you spoke to and when.	

Part 3: Supporting evidence

Please list and attach any evidence that supports your complaint. This could include:

- emails or correspondence
- screenshots
- dates and times of relevant events
- witness statements (if applicable)

Please list attached documents here:

Part 4: Desired outcome

Please specify the resolution that you are seeking as a result of this complaint?

☐	Investigation and explanation of what happened
☐	Correction of inaccurate data
☐	Deletion of unlawfully processed data
☐	An apology
☐	Assurance that similar incidents will not occur in the future
☐	Other (please specify):

Part 5: Declaration

I understand that the School/Academy will investigate this complaint in accordance with its Data Usage Access Act 2025 Complaint Process.

Signature:

Date:

APPENDIX A

Complaint letter template

Your name: **Student's name:** **Your relationship to the student:** **Address:** **Telephone number(s):**
Details of the complaint
What action, if any, have you already taken to try and resolve your complaint
What actions do you feel might resolve the problem at this stage?
Are you attaching any paperwork? If so, please give details.
Signature: **Date:**