



The Complete Works Policies

Compliments, Comments and Complaints Policy

Prepared by: Amy Jones - Director of Operations - December 2024

Reviewed by: Karina Cornwell - Director of Education - June 2025

Ratified by: Adam Dalton - Executive Headteacher - June 2025

Date of next review - June 2027

Contents

1. Aim	3
2. Scope	3
3. Legal Compliance and Policy Links	3
4. Principles	4
5. Definitions	4
6. How to Provide Feedback	4
6.1. Compliments	4
6.2. Comments	4
6.3. Complaints	4
7. Complaints Procedure	5
7.1. Stage 1: Informal Resolution	5
7.2. Stage 2: Formal Complaint	5
7.3. Stage 3: Appeal	6
Stage 3a: Appeal to the Executive Headteacher or CEO	6
Stage 3b: Appeal to the Trustees' Complaints Appeal Panel	6
7.4 Timescales and extensions	7
8. Complaints made by parents/carers	7
9. Complaints Form	8
10. Formal Complaints against Senior members of staff	9
11. Persistent complaints	9
11.2. Duplicate complaints	10
11.3. Complaint campaigns	10
12. Confidentiality and Data Protection	10
13. Monitoring and Reporting	11
14. Contact Information	11
15. Review of Policy	11
APPENDIX A	12

1. Aim

The Complete Works (TCW) values feedback as an integral part of improving and maintaining high standards in the education and support we provide for our students. The purpose of this policy is to ensure that all users of TCW are able to comment on the service that we provide. We welcome feedback as opportunities to grow, address concerns, celebrate successes and to continuously enhance our services. This policy outlines how we handle compliments, comments, and complaints in a fair, transparent, and timely manner.

2. Scope

This policy applies across all of TCW's schools and offices and to all stakeholders, including students, parents/carers, employees, referrers, contractors and external partners who wish to provide feedback regarding TCW's services.

This policy does not cover complaints procedures relating to:

- Admissions
- Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- Exclusion
- Whistle-blowing
- Staff grievances
- Staff discipline

Please see our separate policies for procedures relating to these types of complaints.

3. Legal Compliance and Policy Links

This policy complies with:

- Education (Independent School Standards) Regulations 2014 (Part 7: Complaints Handling).
- Equality Act 2010.
- Data Protection Act 2018 and UK GDPR.
- Relevant DfE guidance on handling complaints in schools.

This policy supports/complements the following policies:

- Equality and Diversity Policy
- Disciplinary Policy
- Grievance Policy
- Dealing with Allegations Policy
- Whistleblowing Policy

- Safeguarding and Child Protection Policy (TCW is obliged to pass on to Social Services any disclosures or suspicions of child abuse. This affects the nature of the confidentiality of any potential complaint.)
- Data Protection Policy

4. Principles

TCW is committed to:

- Listening to feedback and using it to improve our services.
- Addressing complaints promptly, respectfully, and impartially.
- Ensuring all feedback is handled confidentially and without discrimination.
- Providing clear procedures for stakeholders to share their experiences with us.

5. Definitions

- **Compliment:** A positive comment recognising excellent service or practice.
- **Comment:** A general observation or suggestion aimed at improving services.
- **Complaint:** An expression of dissatisfaction requiring a formal resolution.

6. How to Provide Feedback

6.1. Compliments

We encourage stakeholders to share positive experiences with us. Compliments can be submitted:

- Verbally to any TCW staff member.
- Via email to feedback@tcw.org.uk.
- Through our website's "Contact Us" page.
- Through a written letter addressed to the Central Office.

All compliments will be acknowledged, and where appropriate, shared with the individual or team concerned.

6.2. Comments

Comments or suggestions can be submitted in the same way as compliments. We will review all suggestions and provide a response within 10 working days where a reply is requested.

6.3. Complaints

Complaints should follow the formal procedure outlined below.

7. Complaints Procedure

7.1. Stage 1: Informal Resolution

- Stakeholders, including parents and carers, are encouraged to raise concerns informally with the relevant member of staff or their line manager in the first instance. Concerns may be raised verbally, in person, by telephone or in writing. Staff should seek to listen, understand and resolve concerns promptly and impartially wherever possible.
- TCW aims to resolve informal complaints within 5 working days. Where a concern cannot be resolved informally, or the parent/carers wishes to make a formal complaint, the matter will progress to Stage 2.

7.2. Stage 2: Formal Complaint

Formal complaints must be submitted using the **TCW Complaints Form**. Requests for this form can come from any member of TCW staff. The Complaints Form should be submitted to the Headteacher or another appropriate senior leader.

The complaints form must include:

- The nature of the complaint.
- Details of any previous attempts to resolve the issue informally.
- The desired outcome.
- Any relevant supporting information or evidence.

Where appropriate the HR Department will appoint an impartial 'Investigating Officer' to investigate the complaint equitably and thoroughly. It is the responsibility of the Investigating Officer to establish the veracity or otherwise of any complaint. No member of staff who is the subject of a complaint or their representative will be permitted to interview or confront the complainant. That role belongs unequivocally with the Investigating Officer, who may, however, wish to bring the parties together as part of the process whereby a resolution is achieved.

The Investigating Officer should take advice from the Headteacher, if at any point in the process they feel that the substance of the complaint may fall within the scope of the Staff Disciplinary and Grievance Policy. This should form part of the report to the Headteacher.

TCW recognises the potential negative effects for individual members of staff, which can occur if they become subjects of complaints. The Investigating Officer is charged with the duty, therefore, of dealing with these fairly, openly and within the principles of natural justice. However, a possible outcome of a complaint is that there is a recommendation to invoke the Disciplinary Policy. In these circumstances the provisions of the Disciplinary Policy take precedence, and in consequence the member of staff who is the subject of the complaint does not have access to the appeal process under this policy.

The member of staff identified in the complaint is not permitted to invoke the Grievance Procedure against the Investigating Officer for the actions the latter takes legitimately in furtherance of their role as Investigating Officer.

The complainant will receive an acknowledgment within 3 working days and a formal response within 15 working days.

7.3. Stage 3: Appeal

If the complainant is dissatisfied with the outcome of a Stage 2 formal complaint, they may appeal in writing. TCW operates a two-stage appeal process, as set out below.

Stage 3a: Appeal to the Executive Headteacher or CEO

The complainant must submit their appeal in writing within 10 working days of receiving the Stage 2 response. The appeal should explain the reasons for dissatisfaction and identify any outstanding concerns or relevant new information.

The appeal will be considered by the Executive Headteacher or Chief Executive Officer (CEO), as appropriate, provided they have not been directly involved in the matters complained about or the earlier investigation. Where neither is able to consider the appeal impartially, an appropriate alternative will be appointed.

The Executive Headteacher or CEO will review the complaint, the Stage 2 investigation and response and any further information submitted as part of the appeal.

A written outcome will be provided within 10 working days of receipt of the appeal, wherever possible. If further time is required, the complainant will be informed of the reason for the delay and the anticipated response date.

If the complainant remains dissatisfied following Stage 3a, they may refer the matter to the Trustees' Complaints Appeal Panel under Stage 3b.

Stage 3b: Appeal to the Trustees' Complaints Appeal Panel

The complainant must request a Stage 3b appeal in writing within 10 working days of receiving the Stage 3a outcome.

The Trustees' Complaints Appeal Panel will consist of at least three people who have not been directly involved in the matters detailed in the complaint. At least one panel member must be independent of the management and running of the school, in accordance with Part 7 of the Education (Independent School Standards) Regulations 2014.

The panel will consider the complaint and the way it has been handled, including the Stage 2 investigation, the Stage 3a appeal outcome and any relevant written submissions. The panel will act impartially and may request further information or clarification where necessary.

The complainant will be given the opportunity to attend the panel hearing and may be accompanied by a representative if they wish. The hearing arrangements and submission deadlines are set out in Appendix A.

The Panel hearing will normally take place within 20 working days of receipt of the Stage 3b appeal, wherever reasonably practicable. The written decision will normally be issued within five working days of the hearing, in accordance with Appendix A. Where these timescales cannot reasonably be met, the complainant will be informed of the reasons for the delay and the anticipated dates for the hearing and decision.

Following the hearing, the panel will make findings and recommendations and issue its decision in writing. The written outcome will be provided to the complainant and, where relevant, the person complained about. A copy will be retained and made available for inspection in accordance with the applicable requirements.

The decision of the Trustees' Complaints Appeal Panel is final. There is no further internal right of appeal under this policy.

7.4 Timescales and extensions

TCW will manage appeals without unreasonable delay and will keep the complainant informed of progress. The timescales set out in this section and Appendix A will be applied consistently. Where a hearing or decision cannot be completed within the anticipated timescale, TCW will explain the reason for the delay, confirm the revised timescale and provide updates as necessary. Any revised timescale must allow the complainant a reasonable opportunity to participate in the process and must not undermine the fairness or effectiveness of the appeal.

The procedure for the Trustees' Complaints Appeal Panel, including arrangements before, during and after the hearing, is set out in Appendix A.

8. Complaints made by parents/carers

TCW recognises that parents and carers may raise concerns in a variety of ways, including verbally, by telephone, email or in person. Parents and carers should be supported to raise concerns at the earliest opportunity so that matters can be resolved promptly and informally wherever possible.

Where a parent or carer raises a concern informally, the member of staff receiving the concern should:

- Listen to the concern and seek to understand the issue clearly.

- Remain professional, respectful and impartial.

- Where appropriate, seek to resolve the concern directly at the point it is raised.

- Where the concern relates to another member of staff, refer the matter to that person's line manager or another appropriate senior member of staff.

Record any significant concern and the action taken to address it.
Avoid making commitments or providing information outside their authority.

Where a concern is raised in person, staff should seek to resolve it informally where appropriate. Staff should not feel under pressure to provide an immediate substantive response where they need to establish the facts or seek advice. They may explain that the concern will be considered and that an appropriate member of staff will respond.

Where the matter cannot be resolved informally, or where the parent/carer wishes to make a formal complaint, the complaint must progress through the formal complaints procedure, as stated above.

9. Complaints Form

All formal complaints must be submitted using the TCW Complaints Form.

The complaints form should provide sufficient information for TCW to understand and investigate the complaint, including:

- The name and contact details of the person making the complaint.
- The student(s) to whom the complaint relates, where applicable.
- A clear description of the complaint.
- The relevant dates, locations and individuals involved, where known.
- Details of any steps already taken to resolve the matter informally.
- The outcome or resolution being sought.

Where a complaint is initially made verbally, including in person or by telephone, the member of staff receiving the complaint should explain the informal resolution process and, where appropriate, direct the parent/carer to the TCW Complaints Form if they wish to make a formal complaint.

A member of staff may assist a parent/carer to access or understand the complaints form where reasonable adjustments, accessibility needs or other circumstances make this necessary. Staff should not complete the substantive content of a complaint on behalf of a complainant or influence the substance of the complaint.

Once the completed complaints form has been received, the complaint will be acknowledged and managed in accordance with Stage 2: Formal Complaint below.

The use of the complaints form does not prevent TCW from exercising appropriate discretion where a complainant is unable to use the form because of accessibility, language, disability or other relevant circumstances. In such cases, TCW will make reasonable arrangements to ensure that the complaint can still be made in writing and considered fairly.

10. Formal Complaints against Senior members of staff

Complaints made against the Headteacher, one of the Directors, Executive Headteacher or CEO can be addressed to any of the following:

- Executive Headteacher
- CEO
- Chair of Trustees

Where a complaint concerns the Executive Headteacher or CEO, or an individual who would otherwise be responsible for considering an appeal has been directly involved in the matters complained about, that individual must not investigate or determine the relevant stage of the complaint or appeal. The complaint will instead be referred to an appropriate person who has not been directly involved and can consider the matter impartially. Where a complaint concerns the Executive Headteacher or CEO, or the complainant remains dissatisfied following the initial appeal, the complainant may refer the matter to the Trustees' Complaints Appeal Panel in accordance with Section 7.3 and Appendix A. The composition of the Panel must meet the independence requirements set out in Appendix A.

11. Persistent complaints

11.1. Unreasonably persistent complaints

Most complaints raised will be valid, and therefore we will treat them seriously. However, a complaint may become unreasonable if the person:

- Has made the same complaint before, and it's already been resolved by following TCW's complaints procedure.
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive.
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure, beyond all reason.
- Pursues a valid complaint, but in an unreasonable manner e.g. refuses to articulate the complaint, refuses to cooperate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out.
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time.
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value.

We will take every reasonable step to address the complainant's concerns, and give them a clear statement of our position and their options. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal (as outlined above) wherever possible.

If the complainant continues to contact TCW in a disruptive way, we may put communications strategies in place, for example:

- Give the complainant a single point of contact via an email address.

- Limit the number of times the complainant can make contact, such as a fixed number per term.
- Ask the complainant to engage a third party to act on their behalf, such as Citizens Advice.
- Put any other strategy in place as necessary.

In extreme cases we may stop responding to the complainant when all of these factors are met:

- We believe we have taken all reasonable steps to help address their concerns.
- We have provided a clear statement of our position and their options.
- The complainant contacts us repeatedly, and we believe their intention is to cause disruption or inconvenience.

Where we stop responding, we will inform the individual that we intend to do so. We will also explain that we will still consider any new complaints they make. In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from our school buildings.

11.2. Duplicate complaints

If we have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, we will assess whether there are aspects that we hadn't previously considered, or any new information we need to take into account.

If we are satisfied that there are no new aspects, we will tell the new complainant that we have already investigated and responded to this issue, and that the process is complete.

If there are new aspects, we will follow this procedure again.

11.3. Complaint campaigns

Where TCW receives a large volume of complaints about the same topic or subject, especially if these come from complainants unconnected with TCW, we may respond to these complaints by sending a template response to all of the complainants.

If complainants are not satisfied with TCW's response, or wish to pursue the complaint further, the normal procedures will apply.

12. Confidentiality and Data Protection

- All feedback will be handled confidentially and in compliance with data protection regulations.
- Personal information will only be shared with individuals directly involved in handling the feedback.
- If any feedback by a complainant is related to suspicions of child abuse, there can be no guarantee of confidentiality. TCW will handle this information in line with our Safeguarding and Child Protection Policy.

13. Monitoring and Reporting

- TCW will keep records of all compliments, comments, and complaints to identify trends and improve services.
- Regular reports on feedback will be reviewed by senior leaders and the Executive Team.

14. Contact Information

- Central Office Address: The Complete Works, 38 Commercial St, London E1 6LP.
- Email: feedback@tcw.org.uk
- Phone: 020 7377 0280.

15. Review of Policy

This policy will be reviewed annually to ensure it remains relevant and effective.

If you have any suggestions or comments regarding this policy, please email suggestions@tcw.org.uk

Policy	Compliments, Comments & Complaints Policy
Date of Approval	July 2020
Approved by	Adam Dalton
Review 1:	June 2022
Approved by:	Adam Dalton
Review 2:	June 2024
Approved by:	Adam Dalton
Review 3:	June 2025
Approved by:	Adam Dalton

APPENDIX A

PROCEDURE FOR THE TRUSTEES' COMPLAINTS APPEAL PANEL

1.0 INTRODUCTION

The Board of Trustees expects complaints to be resolved, wherever possible, within TCW management. A complainant who remains dissatisfied following a Stage 2 formal complaint may appeal to the Executive Headteacher or Chief Executive Officer (CEO), in accordance with Section 7.3 of the Compliments, Comments and Complaints Policy.

Where the complainant remains dissatisfied following this first appeal, they may refer the matter to the Trustees' Complaints Appeal Panel. The Panel will provide an impartial and independent final review of the complaint and the way it has been handled.

The Panel has delegated authority from the Board of Trustees to consider the appeal, make findings and recommendations and determine the final outcome under this procedure.

2.0 COMPOSITION OF THE PANEL

The Trustees' Complaints Appeal Panel will consist of at least three people appointed by or on behalf of the proprietor.

All panel members must be people who have not been directly involved in the matters detailed in the complaint.

At least one panel member must be independent of the management and running of the school, in accordance with Part 7 of the Education (Independent School Standards) Regulations 2014.

For this purpose, TCW will appoint an independent person who has no role in the management or day-to-day running of the school and no direct involvement in the complaint. The independent member may be drawn from an appropriate external organisation or professional network, provided they meet these independence requirements.

The Chair of Trustees will nominate the panel members and ensure that the independence and impartiality of the panel are established before the hearing. Any actual or potential conflict of interest must be declared and addressed before the hearing proceeds.

The Clerk to the Trustees, or another suitable person appointed for this purpose, will act as Clerk to the Appeal Panel. The Clerk will support the administration of the hearing, ensure that the procedure is followed and maintain an accurate record of the proceedings and outcome.

The Panel may have an adviser in attendance where it considers this appropriate. Any adviser will not be a decision-maker unless formally appointed as a panel member and meeting the requirements above.

3.0 BEFORE THE HEARING

The Panel will arrange a hearing as soon as reasonably practicable following receipt of the appeal.

At least 10 working days before the hearing, the complainant will be notified of the time and venue of the hearing. They will also be provided with copies of the written statements and other documents to be considered by the Panel, unless these have already been provided.

The notification will invite the complainant to:

- Attend the hearing, accompanied by a representative if they wish.
- Submit relevant written documents for consideration by the Panel. These should be received by the Chair of the Appeal Panel at least three working days before the hearing.
- Identify any witnesses they wish to call and explain their relevance to the complaint.

The Panel may request additional information from the complainant or TCW where this is reasonably necessary to consider the appeal fairly. Any additional material relied upon by the Panel will be shared with the relevant parties in advance, wherever practicable, to allow them a reasonable opportunity to respond.

Reasonable adjustments will be considered where necessary to enable the complainant to participate in the hearing.

4.0 ORDER OF THE BUSINESS

The hearing will be conducted fairly and impartially, with the Chair responsible for managing proceedings and ensuring that all parties have an appropriate opportunity to present their views.

The usual order of business will be:

- The complainant and their representative, the Headteacher, Executive Headteacher or CEO representing TCW, the panel members, the Clerk and any adviser will assemble.
- The Chair will invite the complainant, or their representative, to explain the reasons for the complaint and appeal. The complainant may call relevant witnesses.
- The TCW representative may ask questions of the complainant and their witnesses.
- The Panel may ask questions of the complainant and their witnesses.
- The TCW representative will explain TCW's response to the complaint and appeal and may call relevant witnesses.
- The complainant may ask questions of the TCW representative and their witnesses.
- The Panel may ask questions of the TCW representative and their witnesses.
- Both parties will be given an opportunity to summarise their position, with the complainant having the final opportunity to speak.
- The complainant, their representative, any witnesses and the TCW representative will withdraw while the Panel considers the evidence and reaches its decision.
- The Panel may adjust the order of proceedings where necessary to ensure a fair and effective hearing.

- Either party may request an adjournment. The Chair will consider the request and determine whether it is reasonable in the circumstances.

5.0 AFTER THE HEARING

The Panel will consider the evidence presented, determine whether the complaint or any part of it is upheld, partially upheld or not upheld and make findings and recommendations as appropriate.

The Panel will reach its decision impartially, based on the information available to it. Its findings and recommendations will reflect the matters considered during the hearing.

Within five working days of the Panel hearing, or as soon as reasonably practicable thereafter, the Chair of the Appeal Panel will inform the complainant and TCW in writing of the Panel's decision, findings and recommendations. Where the complaint concerns an identifiable individual, a copy will also be provided to that person where relevant and appropriate.

The written outcome will:

- Confirm the Panel's decision and explain the reasons for it.
- Set out the Panel's findings and any recommendations.
- Identify any actions TCW is required or has agreed to take, including any relevant timescales.
- Confirm that the decision of the Trustees' Complaints Appeal Panel is final under TCW's Compliments, Comments and Complaints Policy.

The written findings and recommendations will be retained and made available for inspection by the proprietor and Headteacher, in accordance with the Education (Independent School Standards) Regulations 2014.

All correspondence, statements and records relating to individual complaints will be kept confidential, except where disclosure is required or permitted by law, including where access is requested by the Secretary of State or an authorised inspection body.