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Throughout this document, the term parent is used to indicate the person with parental responsibility for the child in school. The term 'Principal' is used to indicate the school leader, this includes the Head of School, Headteacher and Executive Principal.

1. Introduction

1.1. We have a strong commitment to working in positive partnership with the whole school community. A school is a busy place where there are many interactions between pupils, parents, carers and staff as part of the everyday life of the school. We have an ethos of respecting the rights of all members of the community and as part of our curriculum and teaching and learning we work to instil this in our children. From time to time something may go wrong, or you may think we can do something better.

1.2. This procedure is written for parents who wish to raise a concern or complaint regarding the facilities or services that Focus-Trust or one of its schools provides. Unless a separate statutory process is in place (see section 5.), this complaints procedure will be used for all complaints to the Trust.

2. The difference between a concern and a complaint

2.1. We recognise the need to be clear about the difference between a concern and a complaint. Taking informal concerns seriously at the earliest stage reduces the number that develop into formal complaints which is in the best interest of all parties. We aim to ensure that concerns are handled, if at all possible, without the need for formal procedures. Our formal complaints procedure is only necessary if efforts to resolve the matter informally are unsuccessful. Where an individual may feel that an issue has not been dealt with appropriately it is important, for all involved, that there is a clear and transparent process for a complaint to be looked into and followed up.

2.2. Before contacting us, it is important for you to decide whether the issue is suitable for using the Focus- Trust complaint procedure. It will be worth asking the question, 'Is this a concern or a complaint?' Concerns are usually worries or doubts about something that you want make people aware of and/or would like reassurance on. Complaints are an expression of dissatisfaction about someone's actions or lack of action, often requiring action(s) to resolve the matter. The answer to this question should help you decide how best to deal with the issue. Whatever the answer, you should aim to deal with issues as informally as possible; ideally face to face with a member of school staff at an appropriate time.

2.3. This procedure has taken full account of the latest government Best practice guidance for academies complaints procedures March 2021

3. Why do we need guidance and monitoring of school complaints?

3.1. Parents and pupils are stakeholders in the educational system and important partners to our schools. If they are unhappy about something, there should be a clear system and route for them to make the school and Trust aware of their concerns – even if all that entails is an explanation of why something happens in the way that it does.

3.2. As a Trust, we must ensure we comply with regulations about handling complaints. These are contained in the Education (Independent School Standards (England) Regulations 2014 Schedule 1, Part 7.

3.3. Schools and the Trust make sure that concerns are taken seriously, complainants are treated fairly and complainants are offered a chance to state their case either in person or in writing, at each stage of the procedure.

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3.4. If the school/Trust made reasonable attempts to accommodate complainants with dates for complaint meetings and they refuse or are unable to attend they can convene meetings in their absence and reach a conclusion in the interests of drawing the complaint to a close.

4. Who can make a complaint?

4.1. As the complaints policy is based upon Part 7 of the Education (Independent School Standards) Regulations 2014, it mainly applies to complaints from parents/carers of pupils at the school, regarding their child. Complaints received from anyone other than a current parent/carer will be reviewed and, where appropriate, will be responded to inline with this policy and procedure.

4.2. In accordance with administrative law principles, complainants should be given the opportunity to complete the complaints procedure in full.

4.3. We will not normally investigate anonymous complaints. However, the Principal (for schools) or the CEO (for the Trust) will determine whether an anonymous complaint warrants an investigation. Members of staff should refer to the Focus-Trust Whistleblowing Policy if they wish to raise a concern anonymously through that process.

4.4. Complaints must be raised within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. Complaints received outside of this timeframe will not usually be considered, but allowances may be made in exceptional circumstances.

4.5. Complaints received outside of term time or school hours will be treated as if received on the next school day.

5. Complaints not in scope

This complaints procedure covers all complaints about any provision of community facilities or services that schools/the Trust provide. However, there are separate statutory processes that must be followed instead of this complaints procedure for some specific matters, including those listed below.

Exceptions	Who to contact
Admissions to schools	Concerns about admissions should be handled through a separate process – either through the appeals process or via the local authority. Refer the published guidance.
Matters likely to require a Child Protection Investigation	Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance. If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or your local Multi-Agency Safeguarding Hub (MASH).

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Data Protection (including Subject Access Requests [SAR] and Freedom of Information [FOI] requests)	To submit a SAR or FOI request, refer to Trust's policy on this. The Information Commissions Office (ICO) is responsible for all complaints regarding data protection matters. If you are not satisfied with the information provided or believe the school/Trust has not followed statutory requirements in processing your request, contact the ICO at: https://ico.org.uk/make-a-complaint/
Exclusion of children from school*	There is a separate process for managing school exclusions, including an appeals process. Further information about raising concerns about an exclusion can be found at: www.gov.uk/school-discipline-exclusions/exclusions or from the Trust's Suspension and Exclusion Policy. **complaints about the application of the school's behaviour policy can be made through this complaints procedure.*
Special Educational Needs (SEN) statutory assessments	Concerns about statutory assessments of special educational needs should be raised directly with your local authority.
Staff grievances	Complaints from staff will be dealt with under the school's internal grievance procedures.
Staff conduct	Complaints about staff will be dealt with under the school's internal disciplinary procedures, if appropriate. Complainants will not be informed of any disciplinary action taken against a staff member as a result of a complaint. However, the complainant will be notified that the matter is being addressed.
Third Party Providers	All Focus-Trust schools and Central Team make sure that any third-party supplier has its own complaints procedures in place if they are using our premises or facilities to offer: • community facilities • services Any complaints relating to a third-party supplier using our premises or facilities should be submit directly to the supplier, not Focus-Trust.
Whistleblowing	We have an internal whistleblowing procedure for all our employees, including temporary staff and contractors. The Secretary of State for Education is the prescribed person for matters relating to education for whistle-blowers in education who do not want to raise matters direct with their employer. Referrals can be made at: www.education.gov.uk/contactus. Volunteer staff who have concerns about our school should complain through this complaints procedure. You may also be able to complain direct to the LA or the Department for Education (see link above), depending on the substance of your complaint.

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Withdrawal from the curriculum (Religious Education)	Parents may withdraw their child from any aspect of Religious Education (RE), including the Daily Act of Collective Worship (DACW). They do not have to explain why. If parents or carers are not satisfied with the handling of a request to withdraw their child from RE or the DACW, follow this complaints procedure. The right of withdrawal does not apply to other areas of the curriculum where religious matters may be spontaneously raised by pupils or arise in other subjects such as history or citizenship.

6. Resolving issues and complaints

6.1. At every stage in the complaints procedure, Focus-Trust and its schools want to resolve the complaint and work towards rebuilding a positive working partnership with parents. To do so, we will ask what resolution(s) you are seeking through the process, common resolutions include:

- An explanation
- An admission that the situation could have been handled differently or better
- An assurance that we will try to ensure the matter complained of is not repeated
- 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 school policies in light of the complaint
- An apology

Please note that an acknowledgement that the school/Trust could have handled the situation better is not the same as an admission of unlawful or negligent action.

6.2. When initially raising a concern or complaint, Focus-Trust encourages you to contact the school face to face, by telephone, email or letter so that the matter can be dealt with quickly and informally

6.3. For clarity; there is a difference between a concern and a complaint and how these are handled.

- Concerns should be handled swiftly, without the need for formal procedures and should be raised informally with the most appropriate member of staff.

- Complaints will be dealt with through a formal procedure openly, fairly, promptly and without prejudice and should be raised to the most appropriate senior leader.

6.4. If not satisfied after discussing the issue as a concern, you will be advised of the escalation process and can escalate to Stage 1 of the Complaints Procedure.

Please note that any person contacting the Trust office will be directed back to the school to register their concern and if necessary, commence the complaints procedure.

7. Stages of complaint

All complaints handled through this procedure will be processed through three stages (see below), including matters that have initially been raised as a concern. Complaints will not be progressed to the next stage until the previous stage has been completed. However, in the interest of supporting parents and resolving matters as quickly as possible, we may ask a relevant member of staff to provide alternative support or advice on a case-by-case basis.

It is our aim to always meet the timeframes set out in this procedure however there may be occasions when it is not possible to do this, and additional time will be needed. In this circumstance you will be informed as early as possible of the revised timeframe and the reason for the delay.

7.1. Stage 1 – informal:

The complainant should raise the complaint either in writing or verbally to a relevant senior member of staff. The member of staff will meet with the complaint to understand the key concerns and attempt resolve the issue. Where relevant, the staff member will gather information pertinent to the complaint and provide a written, informal response within fifteen (15) school days from the date the complaint was received. If the issue remains unresolved the next stage is a formal complaint, Stage 2.

7.2. Stage 2 – formal

If not satisfied after Stage 1, you may request your complaint be escalated to stage 2 by putting your complaint in writing, if possible by completing the Complaints Form, to the school Principal. The Principal will speak to relevant parties, review information available and investigate the matter. They will then provide a formal written response within twenty (20) school days of the receiving the written stage 2 complaint. If the issue remains unresolved the next stage is a panel hearing, stage 3.

7.3. Stage 3 – panel hearing with an independent panel member

If not satisfied after Stage 2, write to the Focus-Trust – info@focus-trust.co.uk, preferably using the Complaints Form. The Trust will review your complaint and instruct a complaints panel to be convened.

7.3.1 The Complaints Panel will comprise of two representatives of the Trust (e.g. a governor, Trustee or member of the Executive Team) and one person independent of the management and running of the school, and they will aim to hear the complaint within twenty (20) school days. The Principal cannot be a member of the panel as they will already have been involved in handling the complaint. This panel will be as independent of the complaint as possible and can include governors from other schools within the Focus-Trust.

Note that the twenty (20) school days is the intention and may not always be possible.

7.3.2 Parents will be given reasonable notice of the date of the panel hearing. Five (5) school days is the intention, but this may not always be possible. They will be entitled to attend the panel hearing and be accompanied* if they so wish.

** Parents can be accompanied by one other person for support but may not bring legal representation. That person would not usually be allowed to address the Complaints Panel but the panel chair will have the final say on this.*

7.3.3 The complaint panel is not a legal proceeding and will not be managed as such. The civil standard of proof is used for reaching a decision - the 'balance of probability', which means something is more likely than not. This is a lower threshold than the criminal standard of 'beyond all reasonable doubt'.

7.3.4 The proceedings will be chaired by one member of the Complaints Panel and will be conducted in an informal manner but, if appropriate, may be minuted by a clerk to the panel. At least two of the three panel members will be trained in dealing with complaints.

7.3.5 All those attending the hearing are expected to show courtesy, restraint and good manners. If anyone in attendance is verbally or physically aggressive, disrespectful or bad-mannered the Chair may adjourn, reschedule or terminate the hearing. They may also, if appropriate to the situation, agree to proceed without other parties present and provide a decision based on the panel paperwork and statements up until the time the meeting was adjourned.

7.3.6 In accordance with equality law, the Trust will consider making reasonable adjustments if required, to enable complainants to access and complete this complaints procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations. If you require help in completing the form, please contact the school office or the Trust's Executive Assistant.

7.3.7 The Stage 3 Complaints Panel is the last stage of the Trust's complaints process and is not convened to merely rubber-stamp previous decisions. The panel will give a decision in writing within five (5) school days of the hearing to you. A copy of the decision will be forwarded to any persons who are the subject of your complaint and the Principal.

8. Complaints about the Principal

8.1. If your complaint relates to the Principal, speak to them directly and follow the same procedure.

8.2. Stage 1 – arrange to speak to the Principal informally. If the issue remains unresolved after fifteen (15) school days, the complaint can be escalated to Stage 2.

8.3. Stage 2 – if you are not satisfied after Stage 1, write formally to the Head of Governance of the Focus-Trust, preferably using the attached Complaints Form. They will arrange for the complaint to be investigated and aim to respond within twenty (20) school days.

Stage 3 – if you are not satisfied after Stage 2, write to the Chief Executive of the Focus-Trust, preferable using the attached Complaints Form. The Chief Executive will follow the same process as outlined above and convene a Complaints Panel of two Trustees and an independent panel member.

9. Complaints about staff

Complaints against staff will be dealt with by the Principal or someone they designate too,

such as a deputy, then follow the complaints procedure outlined above.

10. Complaint about governors

10.1. Complaints against individual governors should be sent to the Chair of Governors marked Private and Confidential. They will investigate and respond in-line with stage 1 of the complaints process. If you are not satisfied with the stage 1 response, write formally to the Head of Governance of the Focus-Trust who will follow the stage 2 complaint process. Finally, if you are not happy with the stage 2 response, write to the Chief Executive of the Focus-Trust who will instruct a stage 3 panel to be convened.

10.2. Complaints against the Chair of Governors, the entire Local Governing Body (LGB) or complaints involving both the Chair and Vice Chair should be sent to the Head of Governance of the Focus-Trust who will investigate and respond in-line with stage 1 of the complaints process. If you are not satisfied with the stage 1 response, write formally to the Chief Executive of the Focus-Trust who will follow the stage 2 complaint process. Finally, if you are not happy with the stage 2 response, write to the Chair of Trustees of the Focus-Trust who will instruct a stage 3 panel to be convened.

10.3. Parents/complainants should not approach individual Governors to raise concerns or complaints. All complaints must be raised in line with this complaint procedure. Governors have no power to act on an individual basis, and it may also prevent them from considering complaints at a later stage of the procedure.

11. Complaints about the CEO

For multi-academy trusts, the Education (Independent School Standards) Regulations 2014 still apply.

Complaints about the CEO must be addressed in writing to the Chair of the Trust Board at Focus-Trust, Ram Mill Business, First Floor, Gordon Street, Chadderton, Oldham, OL9 9RH marked Private and Confidential. They will deal with it in the first instance and may convene a complaints panel of trustees if necessary.

12. Complaints about Focus-Trust

Complaints against Focus-Trust that are not related to practices in our schools should be addressed in writing to the Chief Operating Officer at Focus-Trust, Ram Mill Business, First Floor, Gordon Street, Chadderton, Oldham, OL9 9RH marked Private and Confidential. They will deal with it in the first instance and if necessary, appoint an external party to act as the investigating officer for these complaints.

13. Complaint campaigns

13.1 If the school/Trust become the focus of a campaign and receive large volumes of complaints that are all based on the same subject or from complainants unconnected with the school/trust this will be responded to as a complaint campaign, and not through the formal complaints process outlined above.

13.2 The response may include:

- sending a template response to all complainants
- publishing a single response on the school's website

- involving the Trust's PR company
- involving the Confederation of School Trusts (CST)
- Signposting complainants to the DfE if they are dissatisfied with the response they receive.

14. Parental responsibility

14.1. Conflict between estranged parents over the application of parental responsibility is a common cause of complaints made to schools. However, schools are not able to provide any legal advice to parents on this matter and must treat all parties with parental responsibility equally, unless a court order is in place to limit that party's rights. Parents should pursue any matter regarding parental responsibility through the Family Court and should seek legal advice for support.

14.2. The school/Trust will follow the DfE's guidance Understanding and dealing with issues relating to parental responsibility if approached with issues concerning parental responsibility.

15. Data retention and managing records from complaints

15.1. A written record of all formal complaints will be kept confidentially on the school premises in line with the Trust's Data Retention Schedule outlining how they were resolved, including:

- whether they are resolved following a formal procedure, or proceed to a panel hearing; and action taken by the school as a result of those complaints (regardless of whether they are upheld); and
- these will be available on the premises for inspection by Focus-Trust, the Principal and external regulated bodies including Ofsted, the LADO and the DfE.

15.2. All correspondence, statements and records relating to individual complaints are to be kept confidentially on the school premises except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act requests access to them.

15.3. If requested, a copy of the notes may be issued to the complainant subject to any necessary redactions, under the Data Protection Act 2018 and UK GDPR.

16. Complaints from people who are not parents of attending pupils

16.1. There may be occasions when other people wish to make a complaint. The same procedure will be applied as above starting at Stage 1.

17. Managing serial, persistent and vexatious complaints

17.1. Schools/the Trust will do their best to be helpful to people who make contact with:

- a complaint or concern
- a request for information

17.2. However, there will be occasions when, despite all stages of the complaint procedure having been followed, the complainant remains dissatisfied. If a complainant tries to re-

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open the same issue, they will be informed that the procedure has been completed and that the matter is now closed.

17.3. If the complainant contacts the school/Trust again on the same issue, the correspondence may then be viewed as 'serial' or 'persistent' and the school/Trust may choose not to respond. However, this will not be mark as a 'serial' complaint before the complainant has completed the procedure.

17.4. Under no circumstances will a complainant be marked as 'serial' for exercising their right to refer their complaint to their MP, regardless of which stage the complaint has reached. The application of a 'serial or persistent' marking will be against the subject or complaint itself rather than the complainant.

17.5. The Trust has a separate policy for managing serial and persistent complaints**, See Appendix 2**

18. Communications

18.1. If an individual's behaviour is causing a significant level of disruption, regardless of whether or not they have raised a complaint, academies can implement a tailored communication strategy. For example, they can:

- restrict the individual to a single point of contact via an email address
- limit the number of times they can make contact, such as a fixed number of contacts per term

18.2. However, regardless of the application of any communication strategy, parents and carers will continue to be provided with the information they are entitled to under The Education (Pupil Information) (England) Regulations 2005, within the statutory time frame.

18.3. Different procedures apply to freedom of information (FOI) and data protection (DP) correspondence. You should talk to your FOI and DP advisor about those or approach the Information Commissioner's Office for further advice.

18.4. In some circumstances, the school/Trust may ask a third party to act on our behalf, such as the local Citizen's Advice Bureau.

18.5. If an individual persists to the point that may constitute harassment, the Trust will seek legal advice to consider whether injunctions and other court orders should be issued to individuals to prevent them from contacting the school/Trust directly.

18.6. If a decision is made to restrict or cease responding to an individual, they will be informed of this and the reasons for the decision.

19. Recording meetings

19.1. Where there are communication difficulties, the school may wish to use recording devices to ensure the complainant is able to access and review the discussions at a later point. All parties should agree in advance to being recorded.

19.2. Schools are data controllers in their own right and make a decision on a case-by-case basis on whether to allow complainants to record meetings, unless this is required for the purposes of a reasonable adjustment in which case it will be permitted.

19.3. Schools will ensure there is a fair and reasonable purpose for allowing complainants to record meetings, as there may be various levels of identifiable personal information recorded. In doing so schools will consider:

- how any decision to allow recordings may affect any third parties called to act as witnesses
- the impact and consequences on the individuals involved in the complaint in the event recordings are lost or leaked

19.4. Complainants should make sure they obtain informed consent from all parties present before recording conversations or meetings.

19.5. Independent parties such as the DfE do not normally accept electronic recordings as evidence when asked to consider a complaint. However, they may accept independently notarised transcriptions of recordings. They may also ask for the written consent of all recorded parties.

20. Barring from school premises

20.1. Although fulfilling a public function, academies are private places. The public has no automatic right of entry. Schools sometimes need to act to ensure they remain a safe place for pupils, staff and other members of their community.

20.2. If an individual's behaviour is a cause for concern, a Principal can ask them to leave school premises. In some cases, individuals can be barred from entering school premises for a fixed period of time. In this event, the individual will be given the opportunity to formally express their views on the decision to bar them.

20.3. The Principal's decision to bar should then be reviewed by either:

- the Head of Governance
- a committee of governors

20.4. They should take into account any representations made by the individual and decide whether to either confirm or lift the bar. If the decision is confirmed, the individual should be notified in writing, explaining:

- how long the bar will be in place
- when the decision will be reviewed

20.5. Controlling access to school premises provides more guidance on access to school premises.

21. Department for Education's (DfE) role in relation to complaints

21.1. Complaints about the school failing to comply with this procedure or failing to comply

with any obligation in its Funding Agreement may be made to the Department for Education (DfE) through the online form.

21.2. The DfE will only consider a complaint if the complainant provides evidence that the school or trust:

- does not have a complaints procedure
- did not provide a copy of its complaints procedure when requested
- does not have a procedure that complies with statutory regulations
- has not followed its published complaints procedure
- has not allowed its complaints procedure to be completed

21.3. The DfE are **not** able to:

1. overturn the complaint panel's decision
2. re-investigate the original complaint
3. review the accuracy of minutes taken or documents provided
4. order that compensation is paid
5. direct the school to discipline / exclude pupils
6. force the school to discipline / dismiss staff
7. instruct the school to apologise.

Further information about the role of the DfE in complaints and what actions can be taken against the school or trust are included in the best practice guidance for complaints procedures.

Appendix 1: Complaint Form

Name of school	
Your name	
Pupil's name	
Your relationship to pupil	
Your daytime telephone number	
Your email address	

Your complaint is… (Include details of actions already taken by the school to try to resolve the situation)
What action have you already taken to try and resolve your complaint? (Who did you speak to and what was the response?) *If you have not taken any action, please speak to the Principal/Head Teacher*

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What would you like as an outcome of your complaint and what would resolve the matter for you?	
Are you attaching any paperwork? If so, give details here;	
Your signature	
Date	

All functions of the complaints procedure must adhere to the requirements of the Data Protection Act 1998, the General Data Protection Regulations (UK GDPR) 2018 and the Freedom of Information Act 2000.

Please complete and return to the school office in a sealed envelope addressed to the Principal/Head Teacher

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School Office use;

Date received ……

Date acknowledgement of complaint sent ……..

Principal/ ……

Appendix 2: Policy for managing serial and unreasonable complaints

1 Introduction

1.1 Focus-Trust is committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who complain. We will not normally limit the contact complainants have with our schools. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive or threatening.

1.2 Schools/the Trust should do their best to be helpful to people who make contact with:

- a complaint or concern
- a request for information

1.3. However, there will be occasions when, despite all stages of the complaint procedure having been followed, the complainant remains dissatisfied. If a complainant tries to re-open the same issue, you can inform them that the procedure has been completed and that the matter is now closed.

1.4. If the complainant contacts school/the Trust again on the same issue, the correspondence may then be viewed as 'serial' or 'persistent' and school/the Trust may choose not to respond. However, this should not be mark as a 'serial' complaint before the complainant has completed the procedure.

1.5. Under no circumstances should a complainant be marked as 'serial' for exercising their right to refer their complaint to their MP, regardless of which stage the complaint has reached. The application of a 'serial or persistent' marking should be against the subject or complaint itself rather than the complainant.

2 Unreasonable behaviour

2.1 Focus-Trust defines unreasonable behaviour as that which hinders our consideration of complaints because of the frequency or nature of the complainant's contact with the academy, such as, if the complainant:

- refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
- refuses to co-operate with the complaints investigation process
- refuses to accept that certain issues are not within the scope of the complaints procedure
- insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice
- introduces trivial or irrelevant information which they expect to be taken into account and commented on
- raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales
- makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced
- changes the basis of the complaint as the investigation proceeds

- repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
- refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed including referral to the Department for Education
- seeks an unrealistic outcome
- makes excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
- uses threats to intimidate
- uses abusive, offensive or discriminatory language or violence
- knowingly provides falsified information
- publishes unacceptable information on social media or other public forums.

2.2 Complainants should try to limit their communication with the academy that relates to their complaint, while the complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text), as it could delay the outcome being reached.

2.3 Whenever possible, the Principal/Trust representatives will discuss any concerns with the complainant informally before applying an '*unreasonable'* marking.

2.4 If the behaviour continues, the Principal/Trust representative will write to the complainant explaining that their behaviour is unreasonable and ask them to change it. For complainants who excessively contact one of our academies causing a significant level of disruption, we may specify methods of communication and limit the number of contacts in a communication plan. This will be reviewed after six months.

2.5 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 the academy.

3 Publicising this procedure

3.1 This procedure will be made available on school websites and the Trust website in line with statutory guidance.

4 Monitoring, evaluation and review

4.1 This procedure will be reviewed at least every three years and assess its implementation and effectiveness.

5 Vexatious complaints

5.1 In the event that, despite all stages of the procedure having been followed, the complainant remains dissatisfied then the schools/Trust may receive complaints they consider to be vexatious. The characteristics of a 'frivolous' or 'vexatious' complaint are:

- complaints which are obsessive, persistent, harassing, prolific, repetitious

- insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason
- insistence upon pursuing meritorious complaints in an unreasonable manner
- complaints which are designed to cause disruption or annoyance
- demands for redress that lack any serious purpose or value

5.2 In the event that a 'frivolous' or 'vexatious' complaint is received on a matter than has already been responded to through the full complaints procedure, the Principal/COO will inform them in writing that the procedure has been exhausted and that the matter is now closed.

5.3 In the event that the Trust must decide to no longer respond to an individual, the following will be taken into account:

- the school/Trust has taken every reasonable step to address the complainant's concerns
- the complainant has been given a clear statement of the Trust's position and their options
- the complainant contacts the school/Trust repeatedly, making substantially the same points each time

5.4 The decision to stop responding may be expediated if:

- the complainant's letters, emails, or telephone calls are often or always abusive or aggressive
- they make insulting personal comments about or threats towards staff
- the Trust has reason to believe the individual is making contact with the intent to cause disruption or inconvenience