



LET Complaints Procedure (Secondary)

Effective September 2026

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This Policy applies to all SECONDARY schools within Lumero Educational Trust

Version Control

Version	Author	Dated	Status	Reviewed date
1	CEO/COO	Summer 2026	Adjusted to reflect CST guidance on AI use.	

Policy Statement

Lumero Educational Trust prides itself on the outstanding quality of teaching and pastoral care provided to its students. It recognises that parents and carers may, from time to time, have concerns about the progress, achievement, behaviour or welfare of their daughter or son. Parents and carers are encouraged to make those concerns known to staff so that they can be addressed in partnership with the school.

This policy deals with complaints from parents/carers of current and former students, provided the complaint was initially raised when the student was still registered at the school. This policy does not deal with complaints from prospective parents.

A complaint can be any matter about which a parent/carer is unhappy and seeks action by the school. The school will take all concerns and complaints seriously and will make every effort to deal with complaints informally, at an early stage, in the spirit of continued respect and partnership.

This procedure does not apply in relation to appeals against student exclusions, admissions and safeguarding concerns (which are managed under the school's Admissions, Exclusions and Safeguarding Policies) and is distinct from formal staff disciplinary proceedings. Appeals regarding permanent exclusions are managed in accordance with the statutory DFE guidance on exclusions.

In most cases any concern or complaint, regardless of whose attention to whom it is initially brought, should be discussed informally (Stage 1) before being submitted at any of the following consecutive formal stages. However, complaints concerning the Headteacher may proceed directly to Stage 2 and be considered by the Chair of the Local Governing Body. A complaint against a member of the school leadership team may also proceed directly at Stage 2 and be considered by the Headteacher.

Policy Aims

The school aims to:

- Resolve all complaints in a timely manner and normally within the timescales set out in this policy. Where this is not possible, such as where a complaint is received during school holidays (which may cause a delay in collecting information, for example, owing to staff absence), the timescales set out in the policy may be extended and you will be informed of the reasons why and the new timescales. References to 'school days' means Monday to Friday (excluding bank holidays) when the school is open during term time. Parents/carers are in turn expected to proceed with their complaint in a timely and reasonable manner. It is expected that if parents/carers wish to escalate their complaint to the next stage of the procedure, they will generally do so within 15 school days of the conclusion of the current stage. Depending upon the circumstances, the school may, acting reasonably, treat a complaint as closed if a parent/carer has not proceeded within this timeframe;
- Provide clarity that Lumero schools will not be obliged to investigate complaints raised more than three months after the incident in question.

- Ensure that complaints are managed, so far as reasonably possible, in line with the procedures set out in this document;
- Ensure that no-one, including a student, is penalised for concerns or complaints raised in good faith;
- Keep a written record, for at least 6 years, of all complaints, the action taken and at what stage they were resolved regardless of whether or not they were upheld;
- Record, in writing, whether each complaint was resolved following a formal procedure, or proceeded to a panel hearing, and the action taken by the school as a result of the complaint (regardless of whether they are upheld);
- Keep confidential all correspondence, statements and records relating to individual complaints except where the Secretary of State or a body conducting an inspection under section 108 or 109 of the 2008 Act requests access to them, or under other legal authority.

The school will keep records of formal complaints and panel hearings, as required by regulation. A record of formal complaints is kept by the school and held securely and is reviewed regularly by the Headteacher to identify whether review or change in practice is needed. Records are held in accordance with the Schools' Privacy Notice but in most cases for a period of at least 6 years.

Some people like to use AI tools to help organise their thoughts. We recommend against using public AI tools because they can store and republish personal information, such as sensitive details about children/students. AI tools can also introduce inaccurate information, like old rules or laws from other countries. This can delay a response.

Lumero schools will not normally investigate anonymous complaints. However, the headteacher, chair of governors, CEO or Chair of Trust Board, as appropriate, will determine whether the complaint warrants an investigation.

Complainants must raise the complaint within three calendar months of the incident, or where a series of associated incidents occur, within three calendar months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

Due to the nature of staff contracts intended timescales for processing complaints do not include school holidays. Complaints made outside of term time will therefore be considered to have been received on the first school day after the holiday period.

Unless there are communication difficulties that require it, recording devices are not normally permitted during complaint meetings. Where it is necessary, all parties must agree in advance to being recorded. An unauthorised electronic recording of a conversation which has been obtained without the consent of all parties involved will not be accepted as evidence in a complaint meeting.

The school is fully committed to its obligations under the UK Equality Act (2010). Further details are available in the schools Equalities policy document listed on school's website.

The school seeks to implement this policy through adherence, whenever reasonably possible, to the procedures set out in the rest of this document.

In line with our Freedom of Information policy, this document is available to all interested parties on the Trust website and on request from the main school office and should be read in conjunction with the following documents: Admissions Policy, Anti-Bullying Policy, Behaviour Policy, Safeguarding Policy, SEND Policy and any other relevant school policies.

This document is reviewed annually by the Headteacher and the Trust or as events or legislation change requires.

Procedures

Stage 1: Informal Resolution

Management of a concern or complaint at Stage 1 must always precede Stage 2 escalation.

The school recognises that, almost invariably, the sooner concerns are raised the easier it is for an appropriate resolution to be found. In the first instance, you are encouraged to raise your concern or complaint with the following members of staff:

- Concerns of a pastoral nature should normally be made to your child's Head of Year
- Concerns of an academic nature should also be made through the Head of Year
- If the nature of your concern is broader and may cover both academic and pastoral issues then concerns should be directed to either the Assistant Headteacher connected to your child's year group, or the relevant Deputy Headteacher.

That person will normally acknowledge the complaint within 5 school days of receipt. They will try to identify areas of agreement and clarify any misunderstandings that might have occurred. They will make a written record of your concern or complaint, the date on which it was received, and then try to resolve the matter themselves or refer you to the appropriate person.

Should the matter not be resolved within 15 school days or fail to reach a satisfactory resolution then you may proceed with your complaint in accordance with Stage 2 of this procedure. If so, you will be expected to do so within a reasonable timeframe, ordinarily within 15 school days of receiving the outcome of Stage 1. If the complaint concerns the Headteacher, contact the Chair of the Local Governing Body (LGB) under Stage Two of this process.

Stage 2: Formal Resolution – Headteacher

If you wish to take your complaint to this stage, you must put your complaint in writing to the Headteacher using the form at Appendix 1. If the complaint is against the Headteacher, you should make your complaint directly to the Chair of the LGB (using the same form). The Chair or his delegate will review your complaint in accordance with this stage of the procedure.

The Headteacher will acknowledge your formal complaint normally within 5 school days, and will explain how we propose to proceed and set a date (not normally more than 15 school days from the date of receipt of the formal complaint under Stage 2) by which time a response will be provided. The Headteacher will decide, after considering the complaint, the appropriate course of action to take which may include carrying out further investigation. Further investigation may affect timescales and if so, the Headteacher will keep you informed of a date for a response. The Headteacher will also decide whether it would be helpful to meet with you to discuss your complaint.

Once the Headteacher is satisfied that, so far as is reasonably practicable, all the relevant facts have been established, a decision will be made, and you will be informed in writing. This will normally be within 15 school days of having acknowledged the Stage 2 complaint. The response will set out the Headteacher's conclusion, the reasons for it, and any action taken or proposed. The school hopes that you will be satisfied with the outcome and will understand that your concerns have been fully and fairly considered.

If parents/carers are still not satisfied with the decision, they should proceed to Stage Three of this procedure within 15 school days of the Stage Two decision being communicated. If parents/carers do not invoke Stage Three within this timeframe the school may, acting reasonably, deem the complaint closed.

Stage 3: Formal Resolution – Local Governing Body (LGB) Complaints Panel

The third stage of the complaints procedure is the LGB Complaints Panel. If you wish to take your complaint to this stage you are required to put your complaint in writing to the Chair of the LGB, requesting the complaint be reviewed by a Complaints Panel. It is important that you set the matter out in sufficient detail as well as the outcome you are seeking. You should also ensure a copy of all relevant documents accompany your request wherever possible.

A Clerk will be appointed to organise the meeting and convene a Panel consisting of three persons not directly involved in the matter detailed in the complaint, one of whom shall be independent of the management and running of the school. Wherever possible, the Clerk will convene a date for the meeting within 15 school days of receiving the Stage Three request for a Panel meeting. If the request is received during school holidays, the process may be delayed owing to limited availability of personnel and the Clerk will inform you when the meeting will be scheduled.

If the Panel deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the meeting. Copies of such further particulars shall be supplied to all parties, where possible, not later than four school days prior to the meeting. You may attend the meeting in person and may be accompanied if you so wish by a friend, relative or colleague. If you wish to be accompanied, you are required to notify the Clerk of the name and occupation of such a person. Legal representation will not normally be appropriate. The Headteacher may also arrange for a colleague to attend the meeting.

The Panel meeting of Stage 3 will go ahead unless you later indicate that you are satisfied and do not wish to proceed further. A Panel meeting may proceed notwithstanding that you may

subsequently decide not to attend, in which case, the Panel will consider your complaint in your absence and issue findings on the substance of the complaint, thereby bringing the matter to a conclusion. The requirement for the Panel to proceed does not prevent the school from accommodating parental availability for dates or considering comments concerning Panel composition.

Communication of the LGB Complaints Panel Findings

After due consideration of all the facts the Panel considers relevant, the Panel will decide to do one or more of the following:

- 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 school's systems policies or procedures, where appropriate.

The Panel has no power to compel the school to take action.

The Chair of the Panel ensures that the LGB (where appropriate), the Headteacher, the complainant and, where relevant, the person complained about, are notified in writing of the panel's findings and recommendations within 15 school days of the hearing taking place.

This marks the end of the school's formal complaints process.

If the complainant remains dissatisfied following Stage 3, they may wish to put their complaint to Department of Education:

<https://www.gov.uk/government/publications/complain-about-an-academy/complainabout><https://www.gov.uk/government/publications/complain-about-an-academy/complainabout-an-academy>

Managing Serial and Unreasonable Complaints

There will be occasions when, despite all stages of the procedures having been followed, the complainant remains dissatisfied. If the complainant tries to reopen the same issue, the Chair of the LGB will inform them in writing that the procedure has been exhausted and that the matter is now closed.

If the complainant writes again on the same issue, then the correspondence may be recognised as unreasonable under our 'Managing Serial and Unreasonable Complaints Policy' there will be no obligation on the part of the school to respond. Appendix 2 and Appendix 3 outlines when behaviours may constitute as Unacceptable or become Serial or Persistent in nature.

Appendix 1: Stage 2 Complaints Form

Please complete and return to the person detailed in “*Page 5 – Stage 2: formal resolution*” of this policy who will acknowledge receipt and explain what action will be taken. Where possible, please be specific and concise.

Your name:
Pupil's name (if relevant):
Your relationship to the pupil (if relevant):
Address:
Postcode:
Day time telephone number:
Evening telephone number:
Please give details of your complaint.
Please explain what action you have already taken to try and resolve your complaint. (Please note that this policy outlines that you MUST have approached the school to seek resolution before engaging in Stage II).
Please detail who you spoke to, when and how they responded.

What actions do you feel might resolve the problem at this stage? What outcome are you seeking to achieve?

Are you attaching any paperwork? If so, please give details.

Signature:

Date:

Official use

Date acknowledgement sent:

By who:

Complaint referred to:

Date:

Appendix 2: Serial and Persistent Complaints

Serial complaints	There may be occasions when, despite all stages of the procedures having been followed, the complainant remains dissatisfied. If the complainant tries to reopen the same issue, the chair of the Local Governing Body will inform them in writing that the procedure has been completed and that the matter is now closed. If the complainant writes again on the same issue, then the correspondence may be recognised as ‘serial’ or ‘persistent’ and there will be no obligation on the part of the school to respond. Should a complainant raise an entirely new, separate complaint, it must be responded to in accordance with the Complaints Procedure. It is not the complainant who is marked as ‘serial’ or ‘persistent’; it is the complaint.
Unreasonably persistent complaints	The Trust is accountable for the proper use of public money and must ensure that money is spent wisely. In doing so it must strive to achieve value for both complainants and the wider public. The Trust is committed to dealing with all complaints fairly and impartially and to providing a high quality service to those who make them. As part of this service it does not normally limit the contact complainants have with its schools. However, there are a small number of complainants who, because of their frequent contact with a school, hinder consideration of their or other people’s, complaints. Such complainants are referred to as ‘unreasonably persistent complainants’ and, exceptionally, steps may be taken to limit their contact with the school in question. These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which schools often find problematic. It is by no means an exhaustive list. ● Refusing to specify the grounds of a complaint, despite offers of assistance with this from school staff. ● Refusing to cooperate with the complaints investigation process while still wishing their complaint to be resolved. ● Refusing to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure’s scope.

	● Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice. ● Making what appear to be groundless complaints about the staff dealing with the complaints, and seeking to have them replaced. ● Changing the basis of the complaint as the investigation proceeds and/or denying statements he or she made at an earlier stage. ● Introducing new information which the complainant expects to be taken into account and commented on, or raising large numbers of detailed questions which are particularly time consuming and costly to respond to and insisting they are all fully answered. ● Electronically recording meetings and conversations without the prior knowledge and consent of the other persons involved. ● Adopting a 'scattergun' approach: pursuing a complaint or complaints with the school and, at the same time, with a Member of Parliament/a councillor/the authority's independent auditor/the Local Authority/local police/solicitors/the Ombudsman/OFSTED. ● Making unnecessarily excessive demands on the time and resources of staff whilst a complaint is being looked into, by for example excessive telephoning or sending emails to numerous school staff, writing lengthy complex letters every few days and expecting immediate responses. ● Submitting repeat complaints, after complaints processes have been completed, essentially about the same issues, with additions/variations which the complainant insists make these 'new' complaints which should be put through the full Complaints Procedure. ● Refusing to accept the decision or repeatedly arguing the point and complaining about the decision. The decision to restrict a persistent/unreasonable complainant's access to the school will be taken by the Headteacher and will normally follow a prior warning to the complainant. Any restrictions imposed will be appropriate and proportionate. The options we are most likely to consider are:
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	● requesting contact in a particular form (for example, letters only); ● requiring contact to take place with a named member of staff; ● restricting telephone calls to specified days and times; and/or ● asking the complainant to enter into an agreement about their future contacts with the school. In all cases where a Lumero school decides to treat someone as an unreasonably persistent complainant, the school will write to tell the complainant why we believe this behaviour falls into that category, what action the school is taking and the duration of that action. The complainant will be advised that if they disagree with the school's decision they may refer the matter to the Chair of the Local Governing Body. If the school decides to carry on treating someone as an unreasonably persistent complainant and is still investigating their complaint six months later, it will carry out a review and decide if restrictions will continue. Where a complainant whose case is closed persists in communicating about the same issue, this will be treated as a serial complaint in respect of the issue concerned. New complaints from people who have previously been identified as unreasonably persistent complainants will be treated on their merits.
Duplicate complaints	If, after closing a complaint at the end of the complaints procedure, the Trust or a Trust school receives a duplicate complaint from a spouse, a partner, a grandparent or other close family member/associate of the complainant(s), they will be informed that the complaint has already been considered and the local process is complete.

Appendix 3: Unacceptable Behaviour

The Trust recognises that it has a statutory duty to ensure that complaints raised about its schools are taken seriously and dealt with in accordance with this policy. However, the Trust also has a duty to ensure the safety and welfare of its pupils, parents, and particularly its staff.

The Trust does not expect any of its staff to tolerate unacceptable behaviour by complainants which is, for example, abusive, offensive, or threatening, and it will take action to protect staff from that behaviour. This applies to unacceptable behaviour on any part of the school premises, including the grounds.

If a Lumero Headteacher, Executive team member or CEO considers that a complainant's behaviour is unacceptable the complainant will be told why their behaviour is deemed to be unreasonable and will be asked to change it. If the unacceptable behaviour continues, the Headteacher, Executive team member or CEO will take action to restrict the complainant's contact with the school/trust.

The decision to restrict access to a school will be taken by the Headteacher of the school in question. Any restrictions imposed will be appropriate and proportionate. The options most likely to be considered are:

- Requesting contact in a particular form (for example, letters only);
- Requiring contact to take place with a named member of staff;
- Restricting telephone calls to specified days and times; and/or
- Asking the complainant to enter into an agreement about their conduct.

In all cases the complainant will be contacted in writing to explain why the school believes his or her behaviour is unacceptable, what action is being taken and the duration of that action. The Trust CEO and Chair of the school's LGB will also be informed. Where a complainant continues to behave in a way which is unacceptable, the school may decide to terminate contact with that complainant and discontinue any investigation into their complaint.

Where the behaviour is so extreme that it threatens the immediate safety and welfare of the school staff or other stakeholders, alternative courses of action will be considered/taken such as reporting the matter to the police or taking legal action. In such cases, the complainant may not receive prior warning of that action.

Appendix 4: Exceptions to the complaints procedure

Concerns or complaints that relate to aspects of Trust/school services and provision set out in the table below are exempt from the normal complaints process and should be managed and responded to in accordance with the identified information, systems and processes.

Exceptions	Who to contact
Admissions to schools	The Trust acts as its own admissions authority in terms of appeals. Concerns/complaints about admissions should be raised with the relevant admissions authority in the first instance.
Statutory assessments of special educational needs	London Borough of Bromley SEND https://bromleyeducationmatters.uk/Services/5415 OWPS: London Borough of Croydon SEND via senenquiries@croydon.gov.uk
Matters that are likely to require a child protection investigation.	Complaints about child protection matters are handled under the Lumero Child Protection and Safeguarding Policy and in accordance with relevant statutory guidance. If concerns relate to a member of staff, the school should contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH) in line with Keeping Children Safe in Education.
Exclusion of children from school*.	Further information about raising concerns about exclusion can be found at www.gov.uk/school-discipline-exclusions/exclusions. Complaints about the application of a school's Behaviour Policy should be addressed through the Lumero Complaints Procedure.
Whistleblowing.	The Trust has 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 whistleblowers in education who do not want to raise matters directly with their employer. Referrals can be made at www.education.gov.uk/contactus. Volunteer staff who have concerns about a Lumero school should complain through the school's complaints

	procedure. Complaints may also be made directly to the Department for Education.
Staff members' grievances.	Complaints from staff will be dealt with under the Trust's grievance procedures.
Staff members' conduct.	Complaints about staff will be dealt with under the Trust'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.
Complaints about services provided by others who use the school's premises or facilities.	Providers should have their own complaints procedure to deal with complaints about their services. Contact should be made with the provider directly.
The school's reorganisation proposals	The Trust has an internal Change Management Policy for all our employees, including temporary staff.
National curriculum – content.	Please contact the DfE at www.education.gov.uk/contactus .

