

Parents/Carers Complaints Policy

2026 - 2027

‘Because Children Deserve Better’

Reviewed By: Lorraine Bowman, Director of Education and Teaching
Approved By: Kathryn Parkinson, CEO
Responsible Person: Lorraine Bowman, Director of Education and Teaching
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1. Policy, purpose and principles

Pivot is committed to providing high-quality education, care and support, and to work constructively with learners, parents, carers, commissioners, and other stakeholders. We welcome feedback and recognise that concerns and complaints can identify opportunities to improve provision.

In accordance with the Education (Independent School Standards) Regulations 2014, this complaints procedure is published on the schools' website and made available to parents of current and prospective learners upon request and without charge.

This policy sets out a clear, fair, and accessible process for resolving concerns promptly and for investigating formal complaints impartially. Throughout the process, Pivot will:

- act fairly, consistently and without prejudice
- place the welfare and best interests of learners at the centre of decision-making
- seek early, solution-focused resolution wherever appropriate
- address all material points raised and explain decisions clearly
- make reasonable adjustments so the procedure is accessible
- protect confidentiality while meeting safeguarding, legal and regulatory duties
- keep appropriate records and use learning to improve practice

Safeguarding concerns, allegations of abuse and immediate risks to a child are not delayed by the complaints process. They are acted upon under the Safeguarding and Child Protection Policy and statutory safeguarding procedures.

2. Legal and regulatory framework

This policy has been prepared regarding the following requirements and guidance:

- Education (Independent School Standards) Regulations 2014, Schedule, Part 7, paragraph 33
- Department for Education guidance on the Independent School Standards, including the requirements governing complaints
- Education and Skills Act 2008
- Equality Act 2010
- Data Protection Act 2018 and UK General Data Protection Regulation
- Relevant current examinations requirements, awarding body rules and Joint Council for Qualifications guidance where an examinations complaint is raised

The proprietor is responsible for ensuring that the Independent School Standards are met consistently, and that this written procedure is implemented effectively.

3. Scope and eligibility

Statutory parent complaints procedure

The statutory procedure in Part 7 of the Independent School Standards applies to complaints from parents or carers of learners who are registered at the school. A parent includes a person with parental responsibility and a person who has care of a child.

Wider complaints

Pivot will normally use the principles and stages of this policy, where suitable, for complaints from prospective parents, former parents, members of the public, commissioners or other stakeholders. Pivot may adapt the process where the statutory parent complaints requirements do not apply, while ensuring fairness and clarity.

Former learners

A complaint raised while a learner is registered will continue through this procedure if the learner leaves before the process is complete. A new complaint made only after a learner has left may be considered under a proportionate process determined by the Director of Education or Chief Executive Officer, depending on the complaint.

4. Definitions

A concern is an expression of worry or doubt about an issue considered important for which reassurance or a resolution is sought.

A complaint is an expression of dissatisfaction, however made, about actions taken or a lack of action.

A school day means a day on which the school is open to learners for teaching. Unless stated otherwise, the timescales in this policy are expressed in school days.

The proprietor is Michael Smith.

References to directors include those authorised to act on behalf of the proprietor.

5. Accessibility, equality and support

Pivot will consider and make reasonable adjustments where required to enable a complainant, learner, witness or other participant to access the procedure. Adjustments may include:

- providing information in an alternative format
- support with completing the complaint form
- use of an interpreter, advocate or communication support
- an accessible venue, remote attendance or adjusted meeting arrangements
- additional time where this is a reasonable adjustment
- taking account of communication, sensory, cognition, anxiety, or other needs

A learner may make a complaint and may be supported by a trusted adult or advocate. The learner's welfare and views will be considered in a manner appropriate to age, understanding and communication need.

6. How to raise a concern or complaint

Available methods

A concern or complaint may be made in person, by telephone, in writing, or by email. A complainant is encouraged to provide:

- name and contact details
- the learner's name, where relevant
- a clear description of what happened and when
- the steps already taken to resolve the matter
- the outcome sought
- copies of relevant evidence

Concerns should be raised with either the class teacher, pastoral team, special educational needs co-ordinator (SENCO) or headteacher. If the issue remains unresolved, the next step is to make a formal complaint.

The person making the complaint should not approach individual directors to raise concerns or complaints. This may prevent them from considering complaints at Stage 2 of the procedure.

Complaints against Pivot staff (except the headteacher) should be made in the first instance, to the headteacher via the school office. Please mark them as private and confidential.

Complaints that involve or are about the headteacher should be addressed to Lorraine Bowman (Director of Education), via the school office. Please mark them as private and confidential.

Complaints about an individual Director, or Board of Directors, should be addressed to Michael Smith (Proprietor and Chairman) via the school office. Please mark them as private and confidential.

For ease of use, a template complaint form is included at the end of this procedure. If you require help in completing the form, please contact the school office. You can also ask third party organisations like the Citizens Advice or SENDIASS to help you.

Complainants should not approach an individual who may later be required to investigate or sit on a panel, as prior involvement could affect that person's ability to act impartially.

7. Time limits and school holidays

A complaint should normally be raised within three months of the incident or, where there is a series of connected incidents, within three months of the most recent incident. Pivot may consider a complaint outside this period where there are exceptional circumstances, including where the complainant was unable to complain earlier because of disability, ill health, safeguarding concerns, or another compelling reason.

A complaint received outside term time will be treated as received on the first school day after the holiday period. If Pivot cannot meet a published timescale, the complainant will be told the reason and given a revised date. Extensions will be proportionate and will not be used to cause avoidable delays.

8. Complaints outside this procedure

Some matters are governed by another policy, statutory process or external body. Pivot will explain the appropriate route and, where possible, provide contact information.

Matter	Route
Admissions	Use the school's Admissions Policy and any relevant commissioning or local authority process.
Education, Health and Care needs assessments, plans or local authority decisions	Raise with the responsible local authority and use the relevant statutory review, mediation or tribunal route.
Safeguarding or child protection	Managed under the Safeguarding and Child Protection Policy and local multi-agency procedures.
Allegations about adults working with children	Referred to the Designated Safeguarding Lead and, where the criteria are met, the relevant Local Authority Designated Officer.
Suspension or permanent exclusion	Use the school's Suspension and Permanent Exclusion Policy and any applicable placement or contractual review route.
Whistleblowing	Employees, workers, and contractors should use Pivot's Whistleblowing Policy. Other individuals may use this complaints policy where appropriate.
Staff conduct or disciplinary matters	The complaint may inform an internal employment process. Confidential employment outcomes will not be disclosed to the complainant.
Data protection or information rights	Raise with Pivot's designated data protection officer (DPO). The right to complain to the Information Commissioner's Office remains unaffected.
Examinations, centre assessed marks, access arrangements, malpractice or post-results services	Refer to Appendix 5 and the relevant Examinations Policy, Internal Appeals Procedure, awarding body or JCQ route.

9. Safeguarding and allegations

Any complaint that indicates a learner may be suffering, or be at risk of suffering, harm will be referred immediately to the site's Designated Safeguarding Lead. The safeguarding response takes priority over the complaints process. The complaint may continue, be adapted or be paused where necessary to protect a learner or avoid prejudicing a safeguarding investigation.

Where a complaint includes an allegation about an adult who works or volunteers with children, the Headteacher or Designated Safeguarding Lead will consider the allegation under statutory safeguarding guidance and local procedures. If the allegation concerns the Headteacher, it will be referred to the designated senior person acting for the Chairman and proprietor.

A complainant will be told that safeguarding action has been taken where it is lawful and appropriate to do so, but confidential information about a learner, another family or an employee will not be disclosed.

10. Parallel investigations and legal proceedings

Police, safeguarding, employment, regulatory, tribunal or legal processes may run alongside a complaint. Pivot will not automatically stop the complaints procedure solely because another process is under way. Pivot will consider whether continuing could prejudice that process, compromise confidentiality, or create a risk to any person. If part or all the

procedure is paused, the complainant will be informed of the reason and kept updated where possible.

11. Responses, resolving and withdrawing complaints

At every stage, Pivot will seek a fair and proportionate resolution. Depending on the circumstances, this may include:

- an explanation or clarification
- an acknowledgement that a situation could have been handled differently
- an apology
- corrective or remedial action
- a review of a decision, policy, process or practice
- issuing staff guidance, support or training
- an assurance about steps intended to prevent recurrence
- a timescale for agreed action

A complainant may withdraw a complaint at any stage. Pivot will normally ask for written confirmation that the complaint is being withdrawn. Pivot may continue to consider an issue where there is a safeguarding, regulatory, legal or wider school improvement reason to do so.

12. Stage 1: informal resolution

Concerns should normally be raised first with the relevant member of staff. The recipient will listen, clarify the concern and desired outcome, and seek a prompt resolution. If either party cannot deal with the concern objectively, the Headteacher will identify another suitable person.

Pivot aims to acknowledge a Stage 1 concern promptly and to provide a response within 10 school days. Where the matter cannot be resolved informally, the complainant will be given information about Stage 2, formal complaint.

A complainant may move directly to Stage 2 where the matter is serious, the complaint is about the Headteacher, or a senior leader or informal resolution would be inappropriate.

13. Stage 2: Formal complaint

Submission and acknowledgement

A formal complaint should be made to the appropriate recipient identified in section 6, preferably using Appendix 1 form. The complaint will be acknowledged in writing within two school days. The acknowledgement will identify the person responsible for the investigation, confirm the issues to be considered and state the target response date.

Investigation

The decision-maker may appoint an investigator who has not been directly involved in the matters complained of. The decision itself will remain with the appropriate decision-maker.

The investigation may include:

- meeting or speaking with the complainant to clarify the complaint and their desired outcome
- reviewing relevant documents, records and other evidence
- interviewing relevant staff, learners or witnesses, with appropriate support and safeguarding arrangements
- giving a person complained about a fair opportunity to respond
- keeping a written record of meetings, interviews and evidence considered
- distinguishing findings of fact, opinion and recommendation

Written outcome

The written response will normally be issued within 20 school days of receipt of the complaint. It will:

- summarise the complaint and issues investigated
- explain the investigation undertaken, subject to confidentiality
- set out findings and the reasons for the decision
- describe any action the school will take, where this can be appropriately shared
- explain how to request Stage 3 and the applicable deadline

Where the complaint concerns the Headteacher, the Director of Education will undertake or commission the Stage 2 process. Where the complaint concerns the Director of Education or Chief Executive Officer, an authorised director or other suitably independent person with no prior involvement will act as the investigator.

14. Stage 3: panel hearing

Request

A parent who remains dissatisfied following the Stage 2 outcome may request a Stage 3: Panel Hearing. The request should be made in writing within five school days of receiving the Stage 2 response and should explain why the complainant remains dissatisfied and the outcome sought. A late request may be accepted where exceptional circumstances apply but this is at the discretion of Pivot.

Acknowledgement and timing

Pivot will acknowledge the request within three school days. The hearing will be arranged as soon as reasonably practicable and normally within 20 school days of the request. The complainant will be offered reasonable dates and given written notice of the confirmed arrangements. If the complainant declines or does not attend without good reason, the panel may proceed on the written evidence, provided the complainant had a fair opportunity to participate.

Panel composition and independence

The panel will consist of at least three people who were not directly involved in the matters detailed in the complaint. Any Director involved at an earlier stage will not serve on the Stage 3 panel. At least one panel member will be independent of the management and running of the school. There will also be an independent panel member with no prior involvement in the complaint and no connection with the school that could reasonably call their independence into question. The proprietor will take reasonable steps to identify and manage any actual or

perceived conflict of interest. The proprietor or their appointed representative will appoint a Chair.

Attendance and representation

Where a panel hearing concerns a complaint from a parent of a registered learner, the parent may attend and may be accompanied by a companion. The companion may be a relative, friend, advocate or other supporter. Legal representation is not normally necessary, but Pivot will consider a request fairly in the circumstances. Media representatives may not attend.

Evidence and procedure

The hearing will be private, impartial, and non-adversarial. The parties will normally receive the relevant written material at least three school days before the hearing. New and unrelated complaints will not be added at Stage 3 and should begin at the appropriate earlier stage. The panel may consider new evidence relevant to the existing complaint where fairness permits all parties a reasonable opportunity to respond.

Electronic recording is not normally permitted. It may be agreed as a reasonable adjustment or for another compelling reason, with advance notice and the consent or other lawful authority required. Formal minutes will be taken by a Pivot representative, usually a HR colleague.

The detailed hearing protocol is set out in Appendix 3.

15. Panel outcome and completion

The panel may uphold the complaint in whole or in part or dismiss it. It may make findings and recommendations and may recommend changes to systems, policies, or practices. The panel's findings and recommendations will be provided in writing to:

- the complainant
- the proprietor
- where relevant, the person complained about
- the Headteacher and other persons who need the information to implement the outcome

The written outcome will normally be issued within five school days of the hearing. It will explain the decision and reasons, subject to safeguarding, data protection, legal privilege, and employment confidentiality. The completion letter will confirm that the school's internal procedure is concluded.

16. External referral after completion

After all internal stages have been completed, a complainant may contact the Department for Education if the complainant believes that the school has not followed its published procedure, has failed to meet the Independent School Standards, or has acted unlawfully or unreasonably in relation to education law.

The Department for Education does not normally reinvestigate the substance of a complaint or substitute its decision for the school. Current contact options are:

- Department for Education online complaints contact form available through GOV.UK

- telephone: 0370 000 2288
- Postal address: Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD

External rights relating to safeguarding, data protection, local authority decisions, tribunals, examinations or contractual matters are not removed by this policy.

17. Confidentiality, data protection and records

Correspondence, statements and records relating to individual complaints will be kept confidential except where access is required by the Secretary of State, a body conducting an inspection under section 108 or 109 of the Education and Skills Act 2008, another person with a lawful right of access, or where disclosure is otherwise required or permitted by law. Pivot will keep a written record of all formal complaints, including whether they were resolved at Stage 2 or proceeded to a panel hearing, and the action taken by the school as a result, regardless of whether the complaint was upheld.

Records will be accurate, proportionate, and secure. Access will be limited to those with a legitimate role. Information about third parties, safeguarding, and employment matters will be protected. Privacy information will be made available to complainants as appropriate. Complaint records will be retained and disposed of in accordance with the school's Data Retention Policy and applicable data protection legislation.

18. Monitoring, learning and reporting

The Associate Director of Compliance will maintain the central complaints record. Senior leaders and the proprietor will review complaint themes, timeliness, outcomes, equality and safeguarding issues, and completion of agreed actions. Reports will use anonymised or minimised information wherever possible.

Learning from complaints will feed into school improvement, policy review, staff development, risk management, and quality assurance. The proprietor will receive sufficient assurance to monitor compliance without receiving unnecessary personal data.

19. Serial, persistent or unreasonable contact

Pivot will not label a complainant as unreasonable solely because the complainant is persistent, disagrees with the outcome, or raises a complaint. Restrictions will be considered only where behaviour or the frequency and nature of contact unreasonably hinders the consideration of the complaint, disrupts school operations, or affects the safety and welfare of others.

Before restricting contact, Pivot will normally:

- consider whether reasonable adjustments or additional support are required
- explain the concern and invite the complainant to change the behaviour
- ensure the complaint itself has been considered fairly
- apply only proportionate, time-limited and reviewable restrictions
- confirm the decision, reasons, permitted contact route and review date in writing

Threats, harassment, discriminatory abuse, violence or conduct creating an immediate risk may be addressed without warning and may be reported to the police or other relevant

authority. Access to premises may be restricted where lawful and necessary. Appendix 5 provides further guidance.

20. Roles and responsibilities

Complainant

- raise the matter promptly and explain it clearly
- provide relevant information and identify the outcome sought
- co-operate with reasonable requests and timescales
- treat all involved with dignity and respect
- maintain appropriate confidentiality and avoid publishing information that could identify or prejudice children, families or staff

Investigator

- act impartially and with an open mind
- plan a proportionate investigation
- give relevant parties a fair opportunity to provide evidence and respond
- keep an accurate audit trail
- produce a clear report separating evidence, findings and recommendations
- identify safeguarding, equality, data protection or conflict-of-interest issues

Associate Director of Compliance

- manage correspondence, deadlines and the central record
- ensure accessibility and reasonable adjustments are considered
- support the lawful sharing and secure storage of information
- coordinate panel arrangements and papers
- track implementation of actions and recommendations
- prepare anonymised monitoring information

Decision-maker

- consider the investigation objectively
- decide each material aspect of the complaint
- give clear reasons
- identify proportionate remedies and learning
- provide the correct escalation information

Panel Chair and members

- declare and manage conflicts of interest
- ensure a fair, accessible and non-adversarial hearing
- consider all relevant evidence impartially
- make clear findings and recommendations
- protect confidentiality and the welfare of children
- approve an accurate written outcome

Proprietor

- ensure the procedure meets the Independent School Standards and is available to parents
- ensure a compliant and independent Stage 3 panel is appointed
- receive findings and recommendations
- monitor implementation, themes and improvement
- ensure records are available for lawful inspection

21. Policy review

This policy will be reviewed annually or sooner if there is a change in law, regulatory guidance, organisational structure or learning from complaints or inspection. Contact details and role titles will be checked before publication.

22. Appendix 1: Complaint form

Please complete and return to the headteacher who will acknowledge receipt and explain what action will be taken.

Your name:
Learner's name (if relevant):
Your relationship to the learner (if relevant):
Address:
Postcode:
Day time telephone number:
Evening telephone number:
Please give details of your complaint, including whether you have spoken to anybody at Pivot about it.
What actions do you feel might resolve the problem at this stage?
Are you attaching any paperwork? If so, please give details.
Signature:
Date:
Official use only
Date acknowledgement sent:
By whom:
Complaint referred to:
Date:

23. Appendix 2: Complaint acknowledgement and outcome checklist

Acknowledgement checklist

- Date-stamp and secure the complaint
- Check the correct recipient and any conflict of interest
- Screen immediately for safeguarding, allegation, criminal, data protection or health and safety issues
- Confirm whether the statutory parent complaints procedure applies
- Acknowledge within the published timescale
- Identify the issues, investigator / decision-maker, and target response date
- Ask about reasonable adjustments, communication support, and preferred contact methods
- Explain confidentiality and any parallel process
- Create or update the complaints record

Investigation quality checklist

- Investigation plans are proportionate and impartial
- All material points are addressed
- Relevant policies and standards are identified
- Parties have a fair opportunity to provide information and respond
- Records distinguish fact, opinion and allegation
- Learners' welfare, voice and communication needs are considered
- Third-party data and employment confidentiality are protected
- Delay is explained and a revised date provided

Outcome letter checklist

- Complaints and scope are accurately summarised
- The method of investigation is explained
- Decisions and reasons are clear
- Actions and learning are stated where they can be shared
- No confidential disciplinary, safeguarding, or third-party information is disclosed
- Correct next stage; recipient and deadline are included
- Central records and action trackers are updated

24. Appendix 3: Stage 3 panel hearing protocol

Before the hearing

1. Appoint at least three panel members with no direct involvement in the matters complained of including at least one person independent of the management and running of the school
2. Appoint a Chair and minute taker
3. Confirm the complaint issues within scope and the remedy sought
4. Offer reasonable dates, accessibility arrangements and the right of a parent to attend and be accompanied
5. Set a fair deadline for evidence and circulate the indexed hearing pack, normally at least three school days before the hearing
6. Provide the proposed agenda and explain confidentiality and recording arrangements

Suggested hearing order

1. Chair introduces participants, confirms independence, purpose, scope and ground rules
2. Complainant explains the complaint and may be asked questions
3. The school representative explains the Stage 2 decision and may be asked questions
4. Any witnesses contribute separately where required and then withdraw
5. Both parties clarify outstanding points
6. The complainant gives a brief closing statement
7. The school representative gives a brief closing statement
8. Parties withdraw. The panel considers findings, outcomes, recommendations, and any action

Decision-making framework

1. Decide disputed facts on the balance of probabilities
2. Address each material complaint point
3. Separate findings of fact from recommendations
4. Consider whether policies were followed, and whether actions were lawful, reasonable, fair and proportionate
5. Identify any safeguarding or regulatory referral that remains necessary
6. Make recommendations specific, proportionate, and capable of being monitored

After the hearing

1. Issue findings and recommendations in writing, normally within five school days
2. Send them to the complainant, proprietor, and, where relevant, the person complained about
3. Confirm completion of the internal procedure and the external referral route
4. Approve and secure the minutes, decision record and evidence pack
5. Log, assign, and monitor all agreed actions

25. Appendix 4: Managing unreasonable behaviour and contact

Examples that may justify action

- refusing to identify the complaint or desired outcome despite support
- insisting on a process incompatible with the published procedure
- repeatedly raising the same concluded matter without material new evidence
- frequent, lengthy or duplicative contact that substantially disrupts school operations
- changing the basis of the complaint repeatedly in a way that prevents fair investigation
- abusive, threatening, harassing or discriminatory communication
- publishing confidential information that places a child or another person at risk

Possible proportionate measures

- a single named contact
- specified communication method
- reasonable limits on frequency or length of contact
- consolidation of issues into one response
- refusal to respond to repetitive correspondence where the position has been explained
- meeting arrangements designed to protect safety and dignity
- a time-limited communication plan with a review date
- restriction from premises or referral to police where lawful and necessary

Decision record

Any communication restriction should record the behaviour relied upon, support and adjustments considered, warning given where appropriate, the restriction, permitted emergency or safeguarding contact, start and review dates, decision-maker and route to request review.

26. Appendix 5: Examinations complaints and related routes

Examinations of complaints will be considered with the Examinations Policy, Internal Appeals Procedure, awarding body rules and current JCQ requirements. The Exams Officer in conjunction with the Head Teacher will identify the correct route and deadline. A complaint under this policy must not be used to bypass an awarding body or statutory appeal route.

Examples of grounds for complaint

Area	Examples
Teaching and learning	Required specification content not properly delivered; assessment conducted contrary to instructions; failure to communicate centre-assessed marks or review arrangements.
Access arrangements and special consideration	Failure to assess or implement approved arrangements; inadequate accessible information or equipment; failure to make an eligible application within deadline.
Entries	No entry, late entry, incorrect qualification, component or tier.
Conducting examinations	Inappropriate room conditions; inadequate invigilation; disruption; system failure; failure to follow exam regulations.
Malpractice	Failure to consider, investigate or report alleged, suspected or actual malpractice in accordance with applicable requirements.
Results and post-results	Failure to explain available services; missed deadlines; incorrect service or script; failure to obtain required candidate consent; disagreement with a centre decision not to support a review or appeal.

Routed principles:

- Concerns about internal centre decisions should be directed to the Exams Officer and, where applicable, considered under the Internal Appeals Procedure
- Concerns about an awarding body decision should use the awarding body's review or appeals route
- Candidate consent must be obtained where required for post-results services
- Exam-specific deadlines may be shorter than the timescales in this policy and take priority
- Safeguarding, discrimination, data protection, or malpractice concerns will also be referred under the relevant policy or external process

27. Appendix 6: Number of formal complaints

The number of formal complaints received in the academic year 2025-26 are detailed below.

Leeds - number of complaints registered under the formal complaints procedure: 1

Kirklees – number of complaints registered under the formal complaints procedure: 3

Contact details:

Pivot Leeds East Academy

Cheryl Lotherington - Headteacher
Unit 7
Killingbeck Drive
Leeds
LS14 6UF
Email: cheryl.lotherington@pivot-group.co.uk

Pivot Kirklees Academy

Katie Lockwood – Headteacher
15 A Cartwright Court
Dysonwood Way
HD2 1GN
E mail: katie.lockwood@pivot-group.co.uk