



COMPLAINTS POLICY AND PROCEDURES

Document Control

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1. Introduction and Aims

1.1 Our Commitment

Eternal Light Secondary Boys School is committed to providing the highest quality of education and care for all our pupils. We value feedback from parents and carers and take all concerns and complaints seriously.

This policy aims to ensure that:

- Parents and carers know that the school takes complaints seriously and will respond in a courteous, efficient, and timely manner
- An effective procedure for making and resolving complaints (including appeals) is established
- Parents and carers wishing to make a complaint know how to do so
- There is a clear distinction between concerns that can be resolved informally and formal complaints
- All those involved in handling a complaint make every effort to resolve matters quickly and amicably
- Responses to complaints are made within a reasonable period of time, and where necessary, appropriate action is taken
- Complaints are dealt with fairly, openly and transparently
- The school learns from complaints and uses them to improve our services

1.2 Our Approach

We believe that most concerns can be resolved quickly and informally through discussion with the appropriate member of staff. However, where this is not possible, we have a formal complaints procedure that ensures all complaints are investigated thoroughly and fairly.

The school will treat all complainants with respect and courtesy, and we expect complainants to do the same when raising concerns or complaints.

2. Legislation and Guidance

This policy is based on the following legislation and guidance:

- Education (Independent School Standards) Regulations 2014 - specifically Standard 33, which requires independent schools to have and make available a written procedure to deal with complaints from parents of pupils
- Keeping Children Safe in Education (KCSIE) 2025 - DfE statutory guidance on safeguarding
- Working Together to Safeguard Children 2024 - DfE statutory guidance
- Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR)
- Equality Act 2010
- Human Rights Act 1998

This policy also has regard to:

- Best practice guidance on complaints procedures
- Independent Schools Inspectorate (ISI) inspection framework

3. Scope of This Policy

3.1 What This Policy Covers

This policy covers complaints from parents and carers of current or former pupils about the school's provision or actions.

3.2 What This Policy Does Not Cover

This policy does not cover the following types of complaints, which are dealt with under separate procedures:

Admissions

- Complaints about admissions decisions should be directed to the Proprietors in the first instance

Exclusions and Required Removal

- Complaints about exclusion or required removal decisions are covered by the school's Exclusion Policy (Required Removal)

Statutory Assessments of Special Educational Needs and Disabilities (SEND)

- Complaints about statutory assessments should be directed to the Local Authority

Staff Grievances and Disciplinary Matters

- These are internal matters handled under the school's staff policies

Staff Conduct and Capability

- Complaints about staff conduct or capability are handled under the school's staff disciplinary and capability procedures

Whistleblowing

- Concerns from staff about the school should be raised under the school's Whistleblowing Policy

Child Protection and Safeguarding Concerns

- Safeguarding concerns must be reported immediately to the Designated Safeguarding Lead (DSL) and will be handled under the school's Child Protection and Safeguarding Policy (see Section 11)

Subject Access Requests and Freedom of Information Requests

- These are handled under the school's Data Protection Policy

Complaints About Services Provided by Third Parties

- These should be directed to the relevant service provider (e.g., school meals contractor, transport provider)

A full list of complaints outside the scope of this policy can be found in Appendix B.

3.3 Anonymous Complaints

The school will not normally investigate anonymous complaints under this procedure. However, the Headteacher or Proprietors may determine whether the complaint warrants an investigation on a case-by-case basis.

Important: Anonymous complaints that raise safeguarding concerns will always be referred to the Designated Safeguarding Lead (DSL) for consideration and appropriate action, even if the complaint itself is not investigated under this procedure.

3.4 Complaints Made by Pupils

While this policy is primarily designed for complaints from parents and carers, the school recognises that pupils may also wish to raise concerns or complaints. Pupils are encouraged to:

- Speak to their form tutor, a trusted teacher, or a member of the Senior Leadership Team
- Use the school's pupil voice mechanisms (e.g., school council)
- Speak to the DSL if they have safeguarding concerns

Where appropriate, pupil complaints may be handled under this policy, with adjustments made to ensure the process is age-appropriate.

4. Roles and Responsibilities

4.1 The Proprietors

The Proprietors (the school's governing body) are responsible for:

- Approving this policy and ensuring it is implemented effectively
- Ensuring the school complies with Standard 33 of the Independent School Standards Regulations 2014
- Monitoring the effectiveness of the complaints procedure
- Reviewing complaints data annually to identify trends and areas for improvement
- Hearing complaints about the Headteacher at Stage 2
- Appointing panel members for Stage 3 hearings
- Ensuring that complaints are handled fairly and in accordance with this policy

4.2 The Headteacher

The Headteacher is responsible for:

- Implementing this policy on a day-to-day basis
- Ensuring all staff are aware of the complaints procedure
- Handling formal complaints at Stage 2 (except complaints about themselves)

- Appointing investigating officers where appropriate
- Ensuring complaints are investigated thoroughly and fairly
- Ensuring timely responses to complainants
- Keeping the Proprietors informed of significant complaints
- Maintaining oversight of complaints data and reporting to the Proprietors
- Identifying lessons learned from complaints and implementing improvements

4.3 The Designated Safeguarding Lead (DSL)

The DSL (Mr Hassan Khan) is responsible for:

- Ensuring that any complaints with safeguarding implications are identified and handled appropriately
- Making referrals to external agencies (children's social care, police, LADO) where necessary
- Advising on complaints that involve vulnerable pupils or pupils with social workers
- Ensuring that safeguarding procedures take precedence over the complaints procedure where necessary

4.4 The Complaints Coordinator

The school will appoint a Complaints Coordinator (usually a member of the Senior Leadership Team or school office) who will:

- Be the first point of contact for complainants
- Provide information and guidance about the complaints procedure
- Maintain the complaints register
- Track complaints through the procedure and ensure timescales are met
- Arrange panel hearings
- Ensure all documentation is properly filed and stored

4.5 All Staff

All staff are responsible for:

- Treating complaints seriously and with respect
- Responding promptly to concerns raised informally
- Referring formal complaints to the appropriate person
- Cooperating with complaint investigations
- Maintaining confidentiality
- Learning from complaints to improve practice

4.6 Complainants

Complainants are expected to:

- Treat all staff with respect and courtesy
- Provide accurate and complete information
- Cooperate with the complaints procedure
- Avoid making vexatious or unreasonable demands
- Respect confidentiality
- Allow the school reasonable time to investigate and respond

5. Principles for Complaint Handling

The school will handle all complaints in accordance with the following principles:

5.1 Accessibility

- The complaints procedure will be easily accessible to all parents and carers
- This policy is published on the school website and is available in hard copy on request
- The school will make reasonable adjustments for complainants with disabilities
- Translation and interpretation services will be provided for complainants who do not speak English fluently
- Support will be provided for complainants with literacy difficulties

5.2 Fairness and Impartiality

- All complaints will be investigated fairly and impartially
- Investigating officers will have no prior involvement in the matters being complained about
- Panel members will be independent
- Both the complainant and any staff member complained about will have the opportunity to present their case

5.3 Confidentiality

- Complaints will be handled confidentially
- Information will only be shared with those who need to know
- Records will be stored securely in accordance with data protection legislation

5.4 Timeliness

- The school will respond to complaints as quickly as possible
- Timescales are set out in this policy, but may be extended in complex cases
- Complainants will be kept informed of progress

5.5 Proportionality

- The school's response will be proportionate to the complaint
- Informal concerns will be resolved informally where possible
- Formal procedures will be used for more serious complaints

5.6 No Detriment

- Making a complaint will not adversely affect a pupil's education or treatment at the school
- Staff who are the subject of complaints will be supported throughout the process

5.7 Learning and Improvement

- The school will learn from complaints and use them to improve services
- Complaints data will be analysed to identify trends and areas for improvement

6. Stage 1: Informal Resolution

6.1 When to Use Informal Resolution

Most concerns can and should be resolved quickly and informally. Parents and carers are encouraged to raise concerns as soon as they arise so that they can be addressed promptly.

Informal resolution is appropriate for:

- Minor concerns about day-to-day matters
- Concerns that can be resolved through discussion and explanation
- Misunderstandings that can be clarified
- Matters where the parent simply wants information or an explanation

6.2 How to Raise a Concern Informally

Parents and carers can raise a concern informally by:

- Speaking to their child's class teacher or form tutor
- Speaking to a member of the Senior Leadership Team
- Telephoning the school office
- Emailing the relevant member of staff
- Arranging a meeting at the school

Contact details:

- School office: 01274 501597
- School email: office@eternallightschool.co.uk
- School address: Eternal Light Secondary School, Christopher Street, Bradford, BD5 9DH

6.3 How Informal Concerns Will Be Handled

When a concern is raised informally:

1. The member of staff will listen carefully to the concern
2. They will try to resolve the matter immediately, or will arrange to investigate and respond within 5 school days
3. If the concern cannot be resolved by the initial member of staff, it may be referred to a more senior member of staff
4. The outcome will be communicated to the parent/carer, usually by telephone or email
5. A brief written record will be kept of the concern and how it was resolved

6.4 If the Concern Is Not Resolved Informally

If the parent or carer is not satisfied with the response at Stage 1, or if the matter is too serious to be dealt with informally, they should proceed to Stage 2: Formal Complaint.

7. Stage 2: Formal Complaint

7.1 When to Make a Formal Complaint

A formal complaint should be made when:

- The concern has not been resolved satisfactorily at Stage 1

- The matter is too serious to be dealt with informally
- The parent or carer believes the matter requires formal investigation

7.2 How to Make a Formal Complaint

Formal complaints must be made in writing using one of the following methods:

- Completing the Complaints Form (see Appendix A) and submitting it to the school office
- Writing a letter addressed to the Headteacher
- Sending an email to office@eternallightschool.co.uk

The complaint should be sent to:

The Headteacher

Eternal Light Secondary Boys School
Christopher Street, Bradford, BD5 9DH
Email: office@eternallightschool.co.uk

What to Include:

The complaint should include:

- The complainant's name and contact details
- The pupil's name and class (if applicable)
- A clear description of the issue or concern
- Details of what has happened, including dates and times
- The names of any staff members involved
- What has been done so far to try to resolve the issue
- What outcome the complainant is seeking
- Any supporting evidence or documentation

Note: If the complaint is about the Headteacher, it should be addressed to the Proprietors (see Section 9).

7.3 Acknowledgement

The school will acknowledge receipt of the formal complaint within 3 school days. The acknowledgement will:

- Confirm that the complaint has been received
- Provide the name of the person who will be investigating the complaint
- Explain the next steps in the process
- Provide an indicative timescale for the investigation and response

7.4 Investigation

The Headteacher will appoint an appropriate person to investigate the complaint. This will usually be a senior member of staff who has not been involved in the matters complained about.

The investigating officer will:

1. Gather evidence - This may include:
 - Reviewing relevant documents and records
 - Interviewing staff members
 - Interviewing pupils (with parental consent where appropriate)
 - Reviewing CCTV footage (if relevant)
 - Examining physical evidence
2. Interview the complainant - The investigating officer may contact the complainant to clarify details or gather additional information
3. Consider all perspectives - The investigation will consider the views of all parties involved
4. Consult with relevant staff - This may include the DSL (for safeguarding implications) or the SENCO (for SEND-related matters)
5. Prepare a report - The investigating officer will prepare a written report setting out:
 - The complaint
 - The evidence gathered
 - The findings
 - The conclusions
 - Any recommendations

7.5 Timescales

The school will aim to complete the investigation and provide a written response within 15 school days of receiving the complaint.

For complex complaints, this timescale may need to be extended. If this is the case, the complainant will be informed of:

- The reason for the delay

- The new expected response date
- Regular updates on progress

7.6 The Response

At the conclusion of the investigation, the Headteacher will write to the complainant setting out:

- A summary of the complaint
- The findings of the investigation
- The conclusions reached
- The reasons for the conclusions
- Any action taken or proposed
- Information about how to proceed to Stage 3 if the complainant remains dissatisfied

The response will explain whether the complaint has been:

- Upheld - the complaint is substantiated in whole or in part
- Partially upheld - some elements of the complaint are substantiated
- Not upheld - the complaint is not substantiated

7.7 Possible Outcomes

Depending on the findings, the school may:

- Provide an explanation or clarification
- Offer an apology
- Take action to put things right
- Review and revise school policies or procedures
- Provide additional training for staff
- Take disciplinary action against staff (this will be handled confidentially under the school's staff disciplinary procedures)

Note: The complainant will not be informed of any disciplinary action taken against staff, as this is confidential.

7.8 If the Complaint Is Not Resolved

If the complainant is not satisfied with the outcome at Stage 2, they may request that the complaint proceeds to Stage 3: Panel Hearing.

8. Stage 3: Panel Hearing

8.1 When to Request a Panel Hearing

A complainant may request a panel hearing if they are dissatisfied with:

- The outcome of the Stage 2 investigation, or
- The way the complaint was handled at Stage 2

8.2 How to Request a Panel Hearing

The request must be made in writing within 10 school days of receiving the Stage 2 response.

The request should be sent to:

The Proprietors

Eternal Light Secondary Boys School

Christopher Street,

Bradford, BD5 9JX

Email: office@eternallightschool.co.uk

The request should include:

- The complainant's name and contact details
- The pupil's name and class
- A summary of the complaint and the Stage 2 outcome
- The reasons why the complainant is dissatisfied with the Stage 2 outcome
- What outcome the complainant is seeking
- Any additional evidence the complainant wishes to present

8.3 Arranging the Panel Hearing

Upon receipt of a request for a panel hearing, the Proprietors will:

1. Acknowledge the request within **3 school days**
2. Convene an independent panel to hear the complaint within **15 school days** where reasonably practicable (this timescale may be extended if necessary to secure appropriate panel members or to accommodate the availability of all parties)
3. Notify the complainant of the date, time, and location of the hearing at least **10 school days** in

advance

4. Provide details of the panel members

8.4 Panel Composition

The panel will consist of **at least three people** who have not been directly involved in the matters detailed in the complaint.

Panel membership will include:

- **At least one person who is independent of the management and running of the school** - This means someone who:
 - Is not a member of staff at the school
 - Is not a Proprietor
 - Has not been employed at the school within the last 5 years
 - Has no other connection to the school that could affect their impartiality

The panel may also include:

- Additional independent members
- A member of the school's Senior Leadership Team who has not been involved in the complaint (at the discretion of the Proprietors)

The panel will appoint a chair from among its members. The chair will be responsible for:

- Ensuring the hearing is conducted fairly
- Managing the proceedings
- Ensuring all parties have the opportunity to present their case
- Ensuring the panel reaches a decision

Independence and Conflicts of Interest:

All panel members must declare any potential conflicts of interest before the hearing. If a conflict of interest is identified, the panel member will be replaced.

8.5 Preparing for the Hearing

Documentation:

Both parties (the school and the complainant) must submit any evidence they wish to rely on at least **5 school days** before the hearing.

The school will provide:

- The Stage 2 investigation report
- All evidence considered at Stage 2
- A written statement explaining the reasons for the Stage 2 decision
- Copies of relevant policies

The complainant may provide:

- A written statement setting out their case
- Any new evidence not previously considered
- Character references or other supporting documents
- Medical or professional reports (if relevant)

All documentation will be circulated to panel members and both parties at least **3 school days** before the hearing.

Attendance:

The complainant will be invited to attend the hearing and may bring:

- **One supporter** - This may be a friend, family member, or in exceptional circumstances (at the panel's discretion), a legal representative
- **An interpreter** - If the complainant does not speak English fluently, an interpreter will be provided

The pupil may attend if:

- The complainant wishes them to attend
- The panel considers it appropriate given the pupil's age and the nature of the complaint
- It is in the pupil's best interests

The Headteacher (or their representative) will attend to present the school's case.

Any staff member who is the subject of the complaint may attend to present their perspective or may provide a written statement.

Reasonable Adjustments:

The school will make reasonable adjustments for complainants with disabilities, including:

- Accessible venues
- Adjustments to the format of the hearing

- Additional support as needed

8.6 The Hearing Procedure

The hearing will be conducted in accordance with principles of natural justice and fairness.

The hearing will normally follow this format:

1. **Introduction** - The chair will:
 - Introduce panel members and all attendees
 - Explain the purpose and format of the hearing
 - Confirm that all parties have received the documentation
 - Explain that the hearing will be recorded (audio recording) for record-keeping purposes
2. **The Complainant's Case** - The complainant (or their representative) will:
 - Present their complaint and explain why they are dissatisfied with the Stage 2 outcome
 - Present any evidence
 - Call any witnesses (if applicable)
 - Answer questions from the school and the panel
3. **The School's Case** - The Headteacher (or their representative) will:
 - Present the school's response to the complaint
 - Explain the Stage 2 investigation and decision
 - Present any evidence
 - Call any witnesses (if applicable)
 - Answer questions from the complainant and the panel
4. **Summing Up** - Both parties will have the opportunity to make a brief closing statement
5. **Deliberation** - The panel will deliberate in private. Both parties will be asked to leave while the panel considers the evidence and reaches a decision

During the hearing:

- All parties will be treated with respect and courtesy
- The panel may ask questions at any time
- The hearing will be recorded (audio recording) and a written record will be kept
- The panel may adjourn the hearing if necessary (e.g., to seek additional information)

8.7 The Panel's Decision

The panel will consider:

- Whether the complaint has been investigated fairly and thoroughly at Stage 2
- Whether the Stage 2 decision was reasonable in the circumstances
- Whether the school followed its policies and procedures
- All evidence presented at the hearing
- The views of all parties

The panel may:

- **Uphold the Stage 2 decision** - The complaint is not upheld, and no further action is required
- **Partially uphold the complaint** - Some elements of the complaint are upheld and recommendations are made
- **Uphold the complaint** - The complaint is upheld and the panel will make recommendations for action

The panel may also:

- Recommend that the school takes specific action (e.g., review a policy, provide training, offer an apology)
- Recommend that the school reviews its procedures
- Make any other recommendations it considers appropriate

The panel's decision is final and there is no further right of appeal within the school's complaints procedure.

8.8 Notification of the Decision

The panel's findings and recommendations will be:

- Sent in writing to the complainant within **7 school days** of the hearing
- Sent to the Headteacher
- Sent to the Proprietors
- Sent to any staff member who was the subject of the complaint (where relevant)

The written decision will include:

- A summary of the complaint
- A summary of the evidence considered
- The panel's findings on each aspect of the complaint

- The reasons for the panel's decision
- Any recommendations
- Information about how to complain to the Department for Education (see Section 18)

8.9 Implementation of Recommendations

The Headteacher will be responsible for implementing any recommendations made by the panel.

The Headteacher will report to the Proprietors on the implementation of recommendations within **20 school days** of receiving the panel's decision.

8.10 Record Keeping

A copy of the panel's findings and recommendations will be:

- Kept on file in the Headteacher's office
- Available for inspection by the Headteacher and Proprietors
- Made available to the Independent Schools Inspectorate (ISI) on request
- Kept confidential and stored securely in accordance with data protection legislation

9. Complaints About the Headteacher

9.1 How to Complain About the Headteacher

Where the Headteacher is the subject of the complaint, the matter should be referred directly to the Proprietors.

The complaint should be sent in writing to:

The Proprietors

Eternal Light Secondary Boys School

Christopher Street,

Bradford, BD5 9JX

Email: f.patel@eternallightschool.co.uk

Alternatively, complainants may request a sealed envelope marked "Private and Confidential - For the Attention of the Proprietors" to be delivered via the school office.

9.2 Stage 1: Informal Resolution

For minor concerns about the Headteacher, the Proprietors may attempt informal resolution by:

- Speaking to the complainant to understand the concern
- Speaking to the Headteacher
- Facilitating a meeting between the complainant and the Headteacher (if appropriate)

If the concern is resolved informally, a brief written record will be kept.

9.3 Stage 2: Formal Investigation

If informal resolution is not appropriate or is unsuccessful, the complaint will proceed to a formal investigation.

Acknowledgement:

The Proprietors will acknowledge receipt of the complaint within **3 school days** and will explain:

- How the complaint will be investigated
- Who will conduct the investigation
- The expected timescale
- The next steps

Investigation:

The Proprietors will appoint an appropriate person to investigate the complaint. This may be:

- A Proprietor who has not been involved in the matters complained about
- An independent investigator from outside the school

The investigating officer will:

- Gather evidence
- Interview the complainant
- Interview the Headteacher
- Interview any witnesses
- Prepare a written report

Timescales:

The investigation will normally be completed within **15 school days** of the complaint being received. For complex complaints, this timescale may be extended, and the complainant will be kept informed.

The Response:

After considering the investigation report, the Proprietors will write to the complainant within **20 school days** of receiving the complaint. The letter will include:

- A summary of the complaint
- The findings of the investigation
- The conclusions reached
- The reasons for the conclusions
- Any action taken or proposed
- Information about how to proceed to Stage 3 if the complainant remains dissatisfied

9.4 Stage 3: Panel Hearing

If the complainant is dissatisfied with the Stage 2 response, they may request a panel hearing by writing to the Proprietors within **10 school days** of receiving the Stage 2 response.

The panel hearing will follow the procedure set out in Section 8 above, with the following modifications:

- All panel members must be independent of the school (i.e., not members of staff or Proprietors)
- The Headteacher will present the school's case (or may appoint a representative to do so)

10. Complaints About the Proprietors

10.1 How to Complain About the Proprietors

Where the complaint is about the Proprietors (or a member of the Proprietors), the matter should be referred to an independent person.

The complaint should be sent in writing to:

Independent Complaints Investigator

appeals@eternallightschool.co.uk

10.2 Investigation

The independent investigator will:

- Acknowledge the complaint within **3 school days**
- Conduct a thorough and impartial investigation
- Interview all relevant parties
- Prepare a written report

The investigation will normally be completed within **20 school days**.

10.3 The Response

The independent investigator will provide a written response to the complainant, setting out:

- The findings of the investigation
- The conclusions reached
- Any recommendations

A copy of the response will also be sent to the Proprietors.

10.4 Panel Hearing

If the complainant is dissatisfied with the outcome, they may request a panel hearing.

The panel will consist of **three independent members** who have no connection to the school.

The panel hearing will follow the procedure set out in Section 8.

11. Safeguarding Complaints

11.1 Priority of Safeguarding

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.

Where a complaint raises safeguarding concerns, these will take priority over the complaints procedure.

11.2 What Constitutes a Safeguarding Complaint

A safeguarding complaint is one that suggests:

- A child is suffering, or is at risk of suffering, significant harm
- A child's welfare or safety is at risk
- There are concerns about child protection practices at the school
- An allegation has been made against a member of staff (see Section 12)

11.3 How Safeguarding Complaints Will Be Handled

When a complaint raises safeguarding concerns:

1. **Immediate referral to the DSL** - The complaint will be referred immediately to the Designated Safeguarding Lead (Mr Hassan Khan)
2. **Assessment** - The DSL will assess whether:
 - A child is at immediate risk
 - A referral to children's social care is needed
 - A referral to the police is needed
 - A referral to the Local Authority Designated Officer (LADO) is needed
3. **Action** - The DSL will take appropriate action, which may include:
 - Making referrals to external agencies
 - Implementing safeguarding measures
 - Conducting a safeguarding investigation
4. **Complaints procedure paused** - The complaints procedure may be paused while safeguarding investigations take place
5. **Complainant informed** - The complainant will be informed that:
 - The matter is being handled under safeguarding procedures
 - They may not be kept informed of all details due to confidentiality
 - The complaints procedure may resume once safeguarding investigations are complete

11.4 Confidentiality in Safeguarding Cases

In safeguarding cases, the school's duty to protect children takes precedence over the complainant's right to information.

The complainant may not be informed of:

- Details of the safeguarding investigation
- Actions taken to protect children
- Outcomes of referrals to external agencies

This is to protect the welfare of children and to ensure that investigations are not compromised.

12. Complaints Involving Allegations Against Staff

12.1 Allegations That Meet the "Harm Threshold"

Where a complaint involves an allegation against a member of staff that meets the "harm threshold" as defined in Keeping Children Safe in Education (KCSIE) 2025, it will be handled under the school's procedures for managing allegations against staff, not under this complaints procedure.

The harm threshold is met when an allegation suggests that a person has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

12.2 Referral to the LADO

Allegations that meet the harm threshold will be referred to the Local Authority Designated Officer (LADO) within **one working day**.

LADO contact details:

Bradford LADO

Local Authority Designated Officer (LADO)

01274 434339

Frank Hand

frank.hand@bradford.gov.uk

Dawn Holt

dawn.holt@bradford.gov.uk

Children's Safeguarding and Reviewing Unit,

Margaret McMillan Tower, Princess Way, Bradford, BD1 1NN

12.3 Investigation Process

The investigation will be conducted in accordance with Part 4 of KCSIE 2025 and the school's procedures for managing allegations against staff.

The complainant will be informed that:

- The matter is being handled under the school's allegations procedures
- They will be kept informed of progress where appropriate
- They may not be informed of all details due to confidentiality and the need to protect the integrity of the investigation

12.4 Disciplinary Action

Where an investigation concludes that disciplinary action is appropriate, this will be handled under the school's staff disciplinary procedures.

The complainant will not be informed of:

- Details of any disciplinary action taken against staff
- The outcome of disciplinary proceedings

This information is confidential between the school and the member of staff.

However, the complainant will be informed of:

- Whether the allegation was substantiated, unsubstantiated, unfounded, false, or malicious
- Any action the school has taken to address the issues raised (in general terms)

12.5 Low-Level Concerns

Complaints that involve concerns about staff conduct that do not meet the harm threshold will be handled as "low-level concerns" in accordance with the school's procedures.

These may be handled under this complaint's procedure, depending on the nature of the concern.

13. Anonymous Complaints

13.1 General Approach

The school will not normally investigate anonymous complaints under this procedure because:

- We cannot respond to the complainant
- We cannot gather further information
- We cannot ensure the complaint is genuine

13.2 Exceptions

The Headteacher or Proprietors may determine that an anonymous complaint warrants investigation if:

- The complaint raises serious concerns that, if true, would require immediate action
- There is sufficient detail to enable an investigation
- The complaint is supported by evidence

13.3 Safeguarding Concerns

Important: Anonymous complaints that raise safeguarding concerns will always be referred to the Designated Safeguarding Lead (DSL) for consideration and appropriate action, even if the complaint itself is not investigated under this procedure.

The DSL will assess whether:

- A child may be at risk
- A referral to external agencies is needed
- An investigation is required

14. Vexatious or Repeated Complaints

14.1 Definition

For the purposes of this policy, a complaint may be considered vexatious or unreasonable if the complainant:

- Refuses to articulate their complaint or specify the grounds of a complaint, despite offers of assistance
- Refuses to cooperate with the complaints investigation process while still wishing their complaint to be resolved
- Refuses to accept that certain issues are not within the scope of the complaint's procedure
- Insists on the complaint being dealt with in ways which are incompatible with the complaint's 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
- 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
- Seeks an unrealistic outcome
- Makes excessive demands on school time by frequent, lengthy, complicated and stressful 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

14.2 Managing Vexatious or Repeated Complaints

Where the Headteacher (or Proprietors, if the complaint is about the Headteacher) considers that a complaint is vexatious or unreasonable, they may:

For repeated complaints:

- Inform the complainant that the matter has been fully investigated and that the school considers the complaint to be closed
- Inform the complainant that further correspondence on the matter will be acknowledged but not responded to in detail
- Refuse to investigate the complaint further under this procedure

For vexatious complaints:

- Restrict the complainant's contact with the school (e.g., requiring all contact to be in writing, or through a designated member of staff)
- Refuse to investigate the complaint
- Take legal advice about appropriate action

Before taking any of these steps, the school will:

1. Write to the complainant explaining why their behaviour is causing concern
2. Give the complainant the opportunity to modify their behaviour
3. Warn the complainant that if the behaviour continues, restrictions may be imposed

If restrictions are imposed:

- The complainant will be informed in writing
- The letter will explain what restrictions are being imposed and why
- The letter will explain how long the restrictions will remain in place
- The restrictions will be reviewed regularly

14.3 Right of Appeal

If a complainant believes that their complaint has been wrongly classified as vexatious or unreasonable, they may write to the Proprietors (or the independent investigator, if the decision was made by the Proprietors) to request a review of this decision.

The review will consider:

- Whether the decision was reasonable
- Whether the correct procedure was followed

The outcome of the review will be final.

15. Withdrawal of Complaints

15.1 Right to Withdraw

A complainant may withdraw their complaint at any stage by notifying the school in writing.

15.2 School's Right to Continue

Even if a complaint is withdrawn, the school may decide to continue with an investigation if:

- Safeguarding concerns have been raised
- There are concerns about staff conduct that need to be addressed
- There are issues that need to be resolved for the benefit of the school community
- The complaint has raised systemic issues that need to be addressed

If the school decides to continue with an investigation after a complaint has been withdrawn, the complainant will be informed.

16. Recording and Monitoring

16.1 Complaints Register

The school will maintain a complaints register in accordance with Standard 33 of the Education (Independent School Standards) Regulations 2014.

The register will record:

- The date the complaint was received

- The name of the complainant (this will be stored securely and separately from other information to maintain confidentiality)
- A brief description of the complaint
- The stage(s) at which the complaint was handled (informal, Stage 2, Stage 3)
- Whether the complaint was resolved at each stage
- The outcome of the complaint (upheld, partially upheld, not upheld)
- Any action taken
- Whether the complaint proceeded to a panel hearing
- The date the complaint was resolved

16.2 Supporting Documentation

In addition to the complaints register, the school will maintain:

- Copies of all correspondence relating to the complaint
- Investigation reports
- Notes of meetings and telephone conversations
- Evidence gathered during investigations
- Panel hearing records and decisions
- Records of any action taken

16.3 Storage and Retention

All complaints records will be:

- Stored securely in accordance with the school's Data Protection Policy
- Kept confidential
- Accessible only to those who need to see them (e.g., the Headteacher, Proprietors, investigating officers, panel members, ISI inspectors)

Retention periods:

- Complaints records will be retained for **6 years** from the date of resolution
- Records relating to complaints that involve safeguarding concerns will be retained for **25 years** from the date of the pupil's birth, or until the pupil reaches age 25, whichever is later
- Records relating to complaints that result in staff disciplinary action will be retained in accordance with the school's staff records retention policy

16.4 Access to Records

Parents and complainants:

Complainants have the right to request access to records relating to their own complaint, subject to:

- The Data Protection Act 2018 and UK GDPR
- The need to protect the confidentiality of others
- The need to protect the integrity of investigations

Requests for access should be made in writing to the Headteacher.

The Independent Schools Inspectorate (ISI):

The school will make complaints records available to ISI inspectors on request, as required by the Independent School Standards Regulations 2014.

The Secretary of State:

The school will make complaints records available to the Secretary of State or a body conducting an investigation under section 162A of the Education Act 2002 (as amended), if requested.

16.5 Monitoring and Analysis

The Headteacher will:

- Monitor complaints data on an ongoing basis
- Analyse complaints data to identify:
 - Trends or patterns
 - Areas of concern
 - Recurring issues
 - Lessons learned
- Report to the Proprietors on complaints data at least **termly**

The report will include:

- The number of complaints received at each stage
- The types of complaints received
- How complaints were resolved

- The outcomes of complaints
- Any trends or patterns identified
- Any action taken as a result of complaints
- Any recommendations for improvement

16.6 Learning from Complaints

The school is committed to learning from complaints and using them to improve services.

When a complaint is upheld or partially upheld, the school will:

- Consider what went wrong and why
- Identify what can be done to prevent similar issues in the future
- Implement changes to policies, procedures, or practices where appropriate
- Provide additional training or support to staff where needed
- Monitor the effectiveness of any changes made

The Proprietors will review the effectiveness of the complaints procedure annually and will make amendments where necessary.

17. Confidentiality and Data Protection

17.1 Confidentiality

All complaints will be handled confidentially. Information about a complaint will only be shared with:

- Those who need to know in order to investigate and resolve the complaint
- The Proprietors (where appropriate)
- External agencies (where required by law or necessary for safeguarding)
- ISI inspectors or the Secretary of State (if requested)

17.2 Exceptions to Confidentiality

There are circumstances where the school may need to share information about a complaint with third parties:

Safeguarding concerns:

Where a complaint raises safeguarding concerns, information will be shared with:

- The Designated Safeguarding Lead
- Children's social care
- The police
- The Local Authority Designated Officer (LADO)
- Other agencies as appropriate

Criminal offences:

Where an investigation suggests that a criminal offence has taken place, the school will:

- Cease its investigation (or pause it)
- Refer the matter to the police
- Share relevant information with the police

Legal proceedings:

Where the school is subject to legal proceedings, information about complaints may need to be disclosed to:

- The school's legal advisors
- The court
- Other parties to the proceedings

Regulatory requirements:

The school is required to make complaints records available to ISI inspectors and the Secretary of State if requested.

17.3 Data Protection

The school will process personal data relating to complaints in accordance with:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The school's Data Protection Policy

Legal basis for processing:

The school's legal basis for processing personal data relating to complaints is:

- **Public task** - the school is performing a task in the public interest (providing education and ensuring the welfare of pupils)
- **Legal obligation** - the school is required by law to have a complaints procedure and to maintain

records

For special category data (e.g., information about health, race, religion), the school's legal basis is:

- **Substantial public interest** - the processing is necessary for reasons of substantial public interest

Rights of data subjects:

Complainants have the right to:

- Access their personal data (subject access request)
- Request rectification of inaccurate data
- Request erasure of data (in limited circumstances)
- Object to processing
- Lodge a complaint with the Information Commissioner's Office (ICO)

For more information, see the school's Data Protection Policy or contact Mr Hassan Khan,

h.khan@eternallightschool.co.uk.

17.4 Protecting the Identity of Pupils

Where a complaint involves a pupil, the school will take steps to protect the pupil's identity and privacy.

Information about the pupil will only be shared:

- With those who need to know
- With the pupil's parents/carers
- With external agencies (where necessary for safeguarding or legal reasons)

The school will not disclose the identity of a pupil to other parents or members of the public.

18. Complaints to External Bodies

18.1 Complaints to the Department for Education (DfE)

If a complainant is dissatisfied with how the school has handled their complaint, they may complain to the Department for Education (DfE).

The DfE will consider complaints about:

- Schools that have not followed their own complaints procedure correctly
- Schools that have not followed the law when handling complaints

The DfE will not:

- Overturn a school's decision about a complaint
- Direct a school to take specific action
- Consider complaints about matters that are the subject of legal proceedings

How to complain to the DfE:

Complaints should be submitted online at: www.gov.uk/complain-about-school

Or by post to:

Department for Education

Piccadilly Gate

Store Street

Manchester

M1 2WD

Telephone: **0370 000 2288**

Email: school.complaints@education.gov.uk

18.2 Complaints to the Independent Schools Inspectorate (ISI)

The Independent Schools Inspectorate (ISI) is the body that inspects Eternal Light Secondary Boys School.

ISI will consider complaints about:

- Whether the school is meeting the Independent School Standards
- Serious concerns about the school's compliance with regulations

ISI will not:

- Investigate individual complaints about day-to-day matters
- Overturn decisions made by the school
- Direct the school to take specific action in relation to individual complaints

How to complain to ISI:

Independent Schools Inspectorate

CAP House

9-12 Long Lane

London

EC1A 9HA

Telephone: **020 7600 0100**

Email: concerns@isi.net

Website: www.isi.net

18.3 Other External Bodies

Depending on the nature of the complaint, it may be appropriate to contact other external bodies:

Ofsted (for concerns about safeguarding):

Telephone: **0300 123 1231**

Email: whistleblowing@ofsted.gov.uk

Bradford Local Authority Children's Social Care:

Telephone: 01274 433999

Out of hours: 01274 431010

Practitioners: [Share information or make a referral using the online forms](#)

The Police (for criminal matters):

Non-emergency: **101**

Emergency: **999**

The Information Commissioner's Office (ICO) (for data protection concerns):

Telephone: **0303 123 1113**

Website: www.ico.org.uk

19. Review

19.1 Policy Review

This policy will be reviewed **annually** by the Headteacher and Proprietors, or sooner if:

- There are changes to legislation or regulations
- ISI inspectors identify areas for improvement
- The school's monitoring identifies issues with the complaint's procedure
- There are significant changes to the school's circumstances

19.2 Consultation

When reviewing this policy, the school will consider:

- Feedback from complainants
- Complaints data and trends
- Staff feedback
- Best practice guidance
- Changes to legislation or regulations

19.3 Approval and Publication

This policy must be approved by the Proprietors before it comes into effect.

Any changes to the policy must also be approved by the Proprietors.

This policy will be:

- Published on the school website
- Made available in hard copy on request (free of charge)
- Provided to all staff
- Included in the staff handbook
- Referenced in the parent handbook and school prospectus

Appendix A: Complaints Form

ETERNAL LIGHT SECONDARY BOYS SCHOOL COMPLAINTS FORM

Please complete this form and return it to the Headteacher (or the Proprietors if your complaint is about the Headteacher).

You can submit this form by:

- Email: office@eternallightschool.co.uk
- Post: Eternal Light Secondary School, Christopher Street, Bradford, BD5 9DH
- Hand delivery to the school office

Your Details:

Your name: _____

Your relationship to the pupil: _____

Your address: _____

Postcode: _____

Telephone: _____

Email: _____

Pupil Details (if applicable):

Pupil's name: _____

Pupil's class/year group: _____

Your Complaint:

Please provide a clear description of your complaint. Include:

- What happened
- When it happened (dates and times)
- Who was involved
- What you have done so far to try to resolve the issue
- What outcome you are seeking

(Continue on a separate sheet if necessary)

Supporting Evidence:

Please list any documents or other evidence you are submitting with this form:

Declaration:

I confirm that the information I have provided is accurate to the best of my knowledge.

Signature: _____ Date: _____

For office use only:

Date received:

Received by:

Complaint reference number:

Appendix B: Complaints Outside the Scope of This Policy

The following types of complaints are **not** covered by this policy and should be dealt with under separate procedures:

Type of Complaint	How to Proceed
Admissions decisions	Contact the Proprietors in writing. If you remain dissatisfied, you may complain to the DfE.
Exclusions and required removal	Follow the appeals procedure set out in the school's Required Removal (Exclusion) Policy.
Statutory assessments of Special Educational Needs and Disabilities (SEND)	Contact Bradford Local Authority SEND team.
Matters that are the subject of legal proceedings	The school cannot investigate complaints that are the subject of court proceedings.
Staff grievances	Staff should follow the school's Grievance Policy.
Staff disciplinary matters	These are handled under the school's Disciplinary Policy.
Whistleblowing concerns from staff	Staff should follow the school's Whistleblowing Policy.
Child protection and safeguarding concerns	Report immediately to the Designated Safeguarding Lead (Mr Hassan Khan). These are handled under the school's Child Protection and Safeguarding Policy.
Allegations against staff that meet the harm threshold	These are handled under the school's procedures for managing allegations against staff, in accordance with KCSIE 2025.
Subject access requests	Submit a subject access request under the school's Data Protection Policy.
Freedom of information requests	Submit a freedom of information request in writing to the Headteacher.
Complaints about services provided by third parties	Contact the service provider directly (e.g., school meals contractor, transport provider, after-school club provider).
Complaints about other schools	Contact the school concerned directly.
Complaints about the Local Authority	Contact Bradford Local Authority's complaints department.
Employer disputes (e.g., regarding contracts, pay)	These are contractual matters between the school and the employee, not complaints.
Insurance claims	Contact the school's insurance provider.
Historical complaints	The school will not normally investigate complaints about matters that occurred more than 12 months ago, unless there are exceptional circumstances (e.g., safeguarding concerns).

Appendix C: Timescales Summary

This table provides a quick reference guide to the timescales at each stage of the complaints procedure.

Stage	Action	Timescale
Stage 1: Informal	Initial response to concern	Within 5 school days
Stage 2: Formal	Acknowledgement of formal complaint	Within 3 school days
	Investigation and response	Within 15 school days (may be extended for complex cases)
Stage 3: Panel	Request for panel hearing must be submitted	Within 10 school days of receiving Stage 2 response
	Panel hearing convened	Within 15 school days where reasonably practicable
	Documentation submitted by both parties	At least 5 school days before hearing
	Documentation circulated to all parties	At least 3 school days before hearing
	Panel decision communicated	Within 7 school days of hearing
	Implementation report to Proprietors	Within 20 school days of panel decision

Notes:

- All timescales refer to **school days** (i.e., days when the school is open to pupils), unless otherwise stated
- Timescales may be extended in exceptional circumstances (e.g., school holidays, staff illness, complex investigations, police investigations)
- Complainants will be kept informed if timescales need to be extended

Appendix D: Contact Information

School Contacts

School Address:

Eternal Light Secondary Boys School
Christopher Street,
Bradford, BD5 9JX

School Telephone:

01274 501597

School Email:

office@eternallightschool.co.uk

School Website:

www.eternallightschool.co.uk

Key Staff

Headteacher:

Mr Yusuf Collector

Email: y.collector@eternallightschool.co.uk

Telephone: 01274 501597

Designated Safeguarding Lead (DSL):

Mr Hassan Khan

Email: hassan.khan@eternallightschool.co.uk

Telephone: 01274 501597

Complaints Coordinator:

Mr Feizal Patel

Email: appeals@eternallightschool.co.uk

Telephone: 01274 501597

Proprietors

Chair of Proprietors:

Mr Feizal Patel

Contact for Proprietors:

Address: Eternal Light Secondary Boys School
Christopher Street,
Bradford, BD5 9JX

Email: f.patel@eternallightschool.co.uk

External Contacts

Department for Education (DfE)

Piccadilly Gate

Store Street

Manchester

M1 2WD

Telephone: 0370 000 2288

Email: school.complaints@education.gov.uk

Website: www.gov.uk/complain-about-school

Independent Schools Inspectorate (ISI)

CAP House

9-12 Long Lane

London

EC1A 9HA

Telephone: 020 7600 0100

Email: concerns@isi.net

Website: www.isi.net

Bradford Local Authority Children's Social Care:

Telephone: 01274 433999

Out of hours: 01274 431010

Practitioners: [Share information or make a referral using the online forms.](#)

Bradford Local Authority LADO (Local Authority Designated Officer):

Telephone: 01274 434339

Frank Hand frank.hand@bradford.gov.uk

Dawn Holt dawn.holt@bradford.gov.uk

Ofsted (for safeguarding concerns)

Telephone: 0300 123 1231

Email: whistleblowing@ofsted.gov.uk

Website: www.gov.uk/government/organisations/ofsted

Police

Non-emergency: 101

Emergency: 999

Information Commissioner's Office (ICO)

Telephone: 0303 123 1113

Website: www.ico.org.uk

NSPCC Whistleblowing Helpline

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

Appendix E: Availability of Complaints Information

Number of Formal Complaints

In accordance with Standard 33 of the Education (Independent School Standards) Regulations 2014, the school will make available to parents, carers, and ISI inspectors information about the number of formal complaints received during the preceding academic year.

For the academic year 2024-25, the school received:

- **0** formal complaints that proceeded to Stage 2
- **0** formal complaints that proceeded to Stage 3 (panel hearing)

This information is also available on request from the school office.

Note: This information relates to formal complaints only (i.e., complaints that proceeded to Stage 2 or Stage 3 of this procedure). It does not include informal concerns resolved at Stage 1.

How to Request Information

To request information about the number of complaints, please contact:

School Office

Eternal Light Secondary Boys School
Christopher Street,
Bradford, BD5 9JX

School Telephone:

01274 501597

School Email:

office@eternallightschool.co.uk

The information will be provided free of charge within **10 school days** of the request.

Glossary of Terms

Complainant - The person making the complaint (usually a parent or carer)

Complaint - An expression of dissatisfaction about the school's actions or lack of action, or about the standard of service provided by or on behalf of the school

Concern - A matter that can be resolved quickly and informally, without the need for a formal investigation

DSL (Designated Safeguarding Lead) - The senior member of staff responsible for safeguarding and child protection (Mr Hassan Khan at Eternal Light Secondary Boys School)

Harm threshold - The threshold at which an allegation against a member of staff must be referred to the LADO, as defined in KCSIE 2025

Independent - Having no connection to the school that could affect impartiality (e.g., not employed by the school, not a Proprietor, no family connection)

ISI (Independent Schools Inspectorate) - The body that inspects Eternal Light Secondary Boys School

LADO (Local Authority Designated Officer) - The person responsible for managing allegations against staff in a local authority area

Panel hearing - Stage 3 of the complaints procedure, where an independent panel hears the complaint

Proprietors - The governing body of the school

School days - Days when the school is open to pupils (excludes weekends, school holidays, and INSET days)

Stage 1 - Informal resolution of concerns

Stage 2 - Formal investigation of complaints by the Headteacher (or Proprietors if the complaint is about the Headteacher)

Stage 3 - Panel hearing by an independent panel

Vexatious complaint - A complaint that is obsessive, persistent, harassing, prolific, repetitious, insistent upon pursuing unmeritorious complaints, or insistent upon pursuing unrealistic outcomes

Working days - Same as "school days" for the purposes of this policy

Equality Impact Assessment

This policy has been assessed for its impact on equality and diversity. The school is committed to ensuring that this policy:

- Does not discriminate against any individual or group on the basis of protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation)
- Promotes equality of opportunity
- Fosters good relations between different groups

Accessibility:

The school recognises that some complainants may face barriers to accessing the complaints procedure. The school will:

- Provide this policy in alternative formats on request (e.g., large print, audio, translated versions)
- Provide interpretation and translation services for complainants who do not speak English fluently
- Make reasonable adjustments for complainants with disabilities
- Provide support for complainants with literacy difficulties
- Ensure that venues for meetings and panel hearings are accessible

Monitoring:

The school will monitor complaints data to identify whether any groups are disproportionately represented among complainants, and will take action to address any issues identified.

END OF POLICY

Checklist for Implementation

Use this checklist to ensure the policy is properly implemented:

- Policy approved by Proprietors
- Policy published on school website
- Hard copies available on request
- All staff informed of the policy and their responsibilities
- Staff training provided on handling complaints
- Complaints Coordinator appointed
- Complaints register set up
- Complaints form made available (Appendix A)
- Contact details updated in Appendix D
- DfE and ISI contact details displayed prominently
- Safeguarding procedures reviewed to ensure alignment with complaints policy
- Procedures for managing allegations against staff reviewed
- Data protection procedures reviewed to ensure compliance
- Independent panel members identified for potential panel hearings
- Parents informed of the policy (e.g., in newsletter, on website, in parent handbook)
- Annual review date set in diary
- Complaints data monitoring system established
- Process for reporting to Proprietors established