



Complaints Policy and Procedure for Winchester House School

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Approving Body	ELT
Regulatory References	Education (Independent School Standards) (England) Regulations 2014
	Department for Education (DfE) — <i>Best Practice Advice for School Complaints Procedures</i> (January 2021)
	Keeping Children Safe in Education (KCSIE) 2025
	Equality Act 2010
	Data Protection Act 2018
	Safeguarding & CP Policy (BSCP)
	Whistleblowing Policy
	Staff discipline, conduct and grievance policy
Next Review	April 2027

Document distribution:

Website Staff Handbook Parental Portal
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The number of formal complaints registered during the school year 2024-2025 was 2.
This figure will be updated at the start of each academic year.

This document is available to parents on the school website and on request from the school office.

1. Introduction

Winchester House School is committed to providing the highest standard of education, pastoral care, and boarding provision. Central to this commitment is a clear, fair, and transparent procedure for handling complaints so that issues are addressed promptly, proportionately, and effectively. This policy applies to all aspects of the school's provision, including academic, pastoral, co-curricular, and boarding. It has been developed in accordance with Department for Education guidance on school complaints procedures, Keeping Children Safe in Education (KCSIE), the Education (Independent School Standards) Regulations, the National Minimum Standards for Boarding Schools, and the EYFS Statutory Framework.

All staff receive induction and refresher training on handling complaints, and the school ensures that pupils will not be disadvantaged for raising complaints in good faith. The policy applies fully to registered pupils and their parents or legal guardians, while complaints from other parties may be considered at the school's discretion, usually under Stages 1 and 2 only. Staff are expected to be familiar with this policy, and its procedure, and to consider both regularly.

This document is written to comply with Part 7 of the Education (Independent School Standards) Regulations 2014, ensuring that complaints are handled in a timely manner and that, where required, a panel hearing is convened which includes at least one independent member. The school will make reasonable adjustments to enable complainants with disabilities or additional needs to access the complaints procedure.

2. Scope

This policy does not apply where another statutory or policy route exists. Such cases include pupil admissions, pupil exclusions, statutory assessments of Special Educational Needs and Education Health and Care Plans, appeals relating to internal assessment decisions for external qualifications, disciplinary matters relating to staff, matters likely to require a child protection investigation, complaints about services provided by external organisations using the school's facilities, and staff grievances or conduct issues. Each of these matters is dealt with under its own policy.

3. Safeguarding Matters

If a complaint involves safeguarding concerns, allegations of abuse, or a risk of harm to a child, the school will immediately follow safeguarding procedure in accordance with KCSIE and local authority guidance. Safeguarding processes take precedence over the procedure set out in this document, which may be paused, adapted, or discontinued as appropriate. External agencies, including the Local Authority Designated Officer (LADO), children's social care, or the police, may be involved. Complaints about a safeguarding referral made by staff are limited to reviewing the reasonableness of the referral, considering the evidence available at the time. Where a complaint involves an allegation against a member of staff that may meet the harm threshold, the school will follow the procedures set out in Part Four of Keeping Children Safe in Education and consult the Local Authority Designated Officer (LADO). For more information, reference should be made to the school's safeguarding policy.

4. Informal Resolution (Stage 1)

Complaints should be raised as soon as possible, normally within twelve months of the incident, or, where a series of associated incidents has occurred, within twelve months of the last incident. Anonymous complaints will not normally be investigated. Parents/guardians and pupils are encouraged to raise a complaint initially with the staff member most closely involved, such as a teacher, tutor, or houseparent, either in person, by telephone, or in writing.

The school will acknowledge complaints within five working days (noting for the purposes of this document, working days are Mondays to Fridays in full term time, excluding bank holidays). An informal meeting may be arranged to clarify concerns, establish the desired outcome, discuss possible solutions, and agree to the next steps. Complainants may be accompanied by a friend, relative, or supporter, and pupils may attend if appropriate. Staff members are responsible for ensuring that any agreed actions are understood and recorded. Informal concerns are normally resolved within 10 working days. If the complaint remains unresolved, it may progress to Stage 2.

5. Formal Resolution (Stage 2)

If a complaint is not resolved through Stage 1, a formal complaint should be submitted in writing to the Head, or, if the complaint concerns the Head, to the Chair of Governors. Complaints should include sufficient detail, including a summary of concerns, relevant dates and events, steps already taken, and the desired outcome. Reasonable adjustments will be made for accessibility.

The school will acknowledge formal complaints within five working days. The Head may appoint a senior investigator to meet with the complainant, gather statements and evidence, and consult relevant staff. A written response will normally be provided within 15 working days, outlining the findings, decisions, reasons, actions taken or proposed, and the right to escalate to Stage 3. All records will be maintained confidentially.

6. Appeal (Stage 3)

If the complainant is dissatisfied with the Stage 2 response, they may exercise the right of appeal in accordance with the appeal provisions of this document. Requests for a panel hearing should normally be submitted within 10 working days of the Stage 2 decision. An Appeals Panel ('panel') composed of three members including at least one independent member will be convened. The independent member will be independent of the management and running of the school and will not be a current parent, staff member, or governor of the school. The purpose of the panel is to decide whether the complaint has been dealt with appropriately.

A request for a panel hearing must be submitted in writing to the Group Director of Finance of The Stowe Group, who acts as clerk to the panel (clerk'). The panel will normally be convened within 15 working days of the acknowledgement being sent. If it is not reasonably practicable to identify a mutually convenient date, the panel may consider the complaint on written submissions. The clerk ensures that all parties have access to the same documentation and sets out deadlines for submission, with all documentation submitted at least five working days before the hearing.

No panel member may have prior involvement with the complaint. The chair of the panel is appointed from among the members and is usually the governor appointed by the Governing Body as Complaints Governor. The complainant will be invited to attend the hearing and may be accompanied by a friend, relative, or supporter.

The panel will consider only the matters previously raised as part of the complaint. Complainants are entitled to attend the hearing and may be accompanied by a friend, relative, or supporter, but legal representation is not normally appropriate. If the complaint concerns the Head, another senior member of staff may present the school's response. The panel may hear parties separately if this supports fairness or the wellbeing of participants. The clerk ensures accurate records of proceedings, and electronic recordings are not normally permitted.

The panel will determine the procedure appropriate to the circumstances but typically includes introductions, presentations of the complaint and the school's response, questioning, and closing statements. The panel's findings and any recommendations will be

provided in writing within 15 working days, including the reasons for its decision and any actions recommended to improve policy, procedure, or practice. A copy of the panel's findings and recommendations will be provided to the complainant, the Head, and, where relevant, the person complained about. The decision of the panel is final.

7. Complaints Relating to Boarding Provision

Boarding complaints are handled in accordance with the National Minimum Standards for Boarding Schools. Boarders may raise initial concerns with boarding staff members or houseparents, speak to the Designated Safeguarding Lead, contact an independent listener, and raise concerns confidentially without fear of reprisal. Complainants may contact the relevant inspectorate if standards are not met.

8. Persistent or Vexatious Complaints

The school treats all complaints seriously, but there may be rare occasions where a complainant is, in the view of the school, acting in a vexatious or unreasonably persistent way. This will arise, most likely, when the complaints procedure has been concluded. In such cases, the school may limit the method or frequency of contact, require communication in writing, or decline repeated correspondence on matters that have been concluded. Restrictions will be proportionate and reviewed periodically. Safeguarding concerns will always be considered, regardless of prior behaviour. If a complainant continues to raise new concerns without merit, disrupts school operations, or communicates inappropriately with staff, the school may require withdrawal of the pupil or compliance with other restrictive measures.

9. Records, Review, and Monitoring

The school keeps a written record of all complaints, including whether the complaint was resolved at the preliminary stage, formal stage, or proceeded to a panel hearing, and the actions taken as a result. Records include correspondence, statements, notes from meetings or phone calls, and findings and recommendations. Records are confidential except where access is required by the Secretary of State or inspection bodies. Non-safeguarding records are retained for seven years.

An anonymised summary of complaints and lessons learned is reviewed periodically by the Governing Body to identify trends, promote continual improvement, and ensure compliance with statutory guidance. The complaints policy and procedure will be reviewed at least every three years.

10. Staff Complaints

Staff with safeguarding concerns should refer to the Whistleblowing Policy. Other employment-related complaints, grievances, or disciplinary matters are managed through the Staff Discipline, Conduct, and Grievance Policy.

11. Complaint Campaigns

A complaint campaign is defined as a complaint from three or more individuals regarding the same subject. Depending on the circumstances, the school may send a standardised response to all complainants or publish a single response publicly.

12. External Escalation

After completion of the school's complaints procedure, complainants may raise concerns about regulatory compliance with the Independent Schools Inspectorate (ISI), which inspects the school on behalf of the Secretary of State.

13. Contact Details

A formal complaint at Stage 2 to the Head or the Chair of Governors (as appropriate) and an appeal at Stage 3 to the Group Director of Finance, in the capacity of clerk, should be submitted either by email or by post to: Stowe School, Stowe, Buckingham MK18 5EH.

Review Procedure for Expulsions and Pupil Removals

1. Purpose

These guidelines are non-contractual and provide guidance for parents, guardians, pupils, and staff regarding the review of decisions to expel a pupil or require their removal. They are written in line with Department for Education statutory guidance on exclusions, the Independent School Standards Regulations, ISI inspection expectations, and safeguarding requirements as outlined in KCSIE and GDPR.

The committee will consider whether the Head's decision was reasonable and proportionate in the circumstances and reached following a fair process. The committee will not normally rehear the case but will review the decision-making process.

2. Applying for a Review

Parents or guardians must submit a Request for Review Form within five working days ("Working days" refer to school working days during term time unless otherwise stated) of

receiving the written expulsion or removal notice. Forms may be submitted either by email to a.butterworth@alliedschools.org.uk or by post to:

The Chair of the Appeal Committee
c/o Andy Butterworth
The Allied Schools Agency
Elmhurst, Harcourt Hill
Oxford OX2 9AS

The review will normally take place within 15 working days of the expulsion or removal decision. If exceptional circumstances cause a delay, parents will be notified in writing and provided with revised timescales. All Review Committee ('committee') members will receive relevant documentation, including the pupil's conduct file, and parents will also receive copies in advance, except where the Head reasonably determines that disclosure would compromise safeguarding, confidentiality, or legal obligations.

3. Composition of the Review Committee

The committee will normally comprise three members of the Governing Body, including at least one independent member. All members must declare any conflicts of interest and must not have prior detailed knowledge of the pupil, family, or case. The Chair of Governors will not be a member. The committee will act independently, fairly, and impartially.

4. Review Hearing

The hearing will usually take place, in person, on the school's premises. Attendees may include committee members, the Head and nominated senior staff, the parent(s)/ guardian(s), the clerk, and the pupil, with attendance determined by age, understanding, and safeguarding considerations. The parent(s)/ guardian(s)/ pupil may be accompanied by a friend, relative, or staff member acting as a supporter rather than a legal representative. Proceedings are informal and unsworn. The clerk will take minutes, while participants may also take personal notes.

The nominated chair of the Review Committee ('Chair') will manage the hearing to ensure all parties have an equal opportunity to speak, that proceedings remain respectful and orderly, and that courtesy and restraint are maintained. The Chair may adjourn or terminate the hearing in cases of misconduct, in which case the original decision will stand. The committee will consider whether the facts relied upon are proven on the balance of probabilities and whether the sanction imposed was proportionate to the pupil's conduct. Witness identities may be withheld only when necessary, and the Chair must review and justify any decision not to disclose. Staff may present evidence regarding the pupil's character, conduct, and achievements if they are willing to do so. The Chair may adjourn the hearing to allow sufficient time for consideration of any matter.

5. Decision and Notification

The committee's decision is final within the school's procedures. The parent(s)/guardian(s) will be informed in writing within five working days of the decision. The written decision will include the committee's findings of fact, the reasoning for the decision, whether the sanction was upheld or adjusted, any recommendations, and information about any next steps externally, such as referral to ISI or the Secretary of State, if exceptional circumstances justify an independent review.

6. Confidentiality

All proceedings and documentation are confidential. Participants must maintain confidentiality in line with GDPR, safeguarding requirements, and good practice. Disclosure will occur only as required by law or to inspection bodies such as ISI, Ofsted, or the Secretary of State. Audio or video recordings of proceedings are not permitted unless all parties provide prior agreement.

7. Boarding Pupils

For boarders, the review will also consider boarding welfare implications. Boarding staff or houseparents may attend the review to support the pupil as appropriate.

8. Record-Keeping

Minutes and all relevant documentation will be securely retained. Retention will comply with data protection and safeguarding guidance, and records will be made available to inspection bodies as required.

REQUEST FOR REVIEW FORM

Name of Pupil:

Name(s) of Parent(s)/Guardian(s):

Address of Parent(s)/Guardian(s):

Telephone numbers:(Day)(Evening)

I/We, being the [person] [persons] with parental responsibility for the above-named pupil, request that a committee of the Governing Body carries out a review of the decision to require removal of or to expel the named pupil.

I/We also agree that the proceedings are and will remain confidential, and that this review will be final subject to such (if any) legal rights as may exist.

The grounds upon which I/we seek a review and the matters which I/we wish to discuss at the review and to ask the Committee to consider are set out on the reverse side of this sheet.

I/We understand that I/we may be accompanied at the review by a friend or relation or by a member of the school staff who knows and who is willing to speak on behalf of the pupil.

First Signature:

Second Signature:

Full Name:

Full Name:

Relationship to Pupil:

Relationship to Pupil:

Date:

Date:

Email to: a.butterworth@alliedschools.org.uk or by post to:

The Chair of the Appeal Committee
c/o Andy Butterworth
The Allied Schools Agency
Elmhurst
Harcourt Hill
Oxford OX2 9AS

Appendix A - Complaints Procedure Flowchart

Stage 1 — Informal Resolution

Parents/ guardians/ pupil raise(s) complaint with staff member most involved

- Complaint discussed and clarified
- Informal meeting if appropriate
- Actions agreed and recorded
- Aim to resolve within 10 working days
 - If resolved → process ends
 - If unresolved → Stage 2



Stage 2 — Formal Resolution

Written complaint submitted to Head OR Chair of Governors (if complaint concerns the Head)
School will:

- Complaint acknowledged within five working days
- Investigation by Head/ appointed investigator/Chair of Governors/ appointed investigator
- Written response normally within 15 working days (EYFS, within 20 working days)
 - If satisfied → process ends
 - If dissatisfied → Stage 3



Stage 3 — Complaints Panel Hearing

- Request in writing to the clerk to panel)
- Panel normally convened within 15 working days of acknowledgement
- Complainants may attend and be accompanied
- Panel considers only matters raised as part of the complaint
 - Panel's findings and recommendations issued within 15 working days
 - Decision of the panel is final

Special Routes / Considerations

- **Safeguarding Complaints:** Follow safeguarding procedures. May involve LADO, social care, police. Complaints paused/adapted if necessary.
- **Boarding Complaints:** Handled as per National Minimum Standards for Boarding Schools. Boarders can raise initial concerns with boarding staff members or houseparents, speak to the DSL, contact an independent listener.
- **Persistent/Vexatious Complaints:** school may limit contact, require written communications, decline repeated correspondence.
- **External Escalation:** Complainant(s) may contact ISI or Ofsted regarding regulatory compliance concerns.