

ILLUMINATE CARE GROUP

Parent Complaints, Independent Panel and Data Protection Complaints Policy

Independent School – England

Reference	SCH-POL-43
Status	Final draft for local approval
Applicability	Core
Owner	Headteacher / Governance Lead
Approver	Proprietor
Issue date	30 July 2026
Planned review	30 July 2027 or earlier after legal, safeguarding, incident or service change

TRIBE in practice • LENS in oversight • Empowerment Pathway in pupil planning

1. Policy statement

Illuminate Care Group adopts this parent complaints, independent panel and data protection complaints policy for its independent school in England. The policy sets mandatory expectations for leaders, staff, volunteers, contractors, pupils and other people acting for the school.

Commencement control: KCSIE 2025 remains the live safeguarding guidance to 31 August 2026. KCSIE 2026 applies from 1 September 2026. The policy owner records the switch in the master register and briefs staff before the new version starts.

2. Scope and status

This document applies at the registered premises, during transport and educational visits, in remote education, on work experience and whenever staff act in their school role. It must be read with pupil-specific plans, local safeguarding procedures, parent terms and the linked SOPs.

Applicability: Core

3. Legal and regulatory framework

Independent School Standards coverage: Part 7 and paragraph 33.

- Education (Independent School Standards) Regulations 2014
- Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025
- Equality Act 2010
- Consumer Rights Act 2015 where parent contracts apply

Guidance does not replace legislation. The proprietor records how current statutory guidance, local safeguarding arrangements and registration conditions apply to the school.

Regulatory duty-to-evidence matrix

This matrix is the compliance specification for this policy. A policy statement alone does not demonstrate compliance: the school must be able to produce the listed evidence and show that it affected practice.

Authority / provision	Required application	Minimum evidence
Independent School Standards: Part 7 and paragraph 33	The proprietor must be able to demonstrate the stated standards through policy, implementation, outcomes and leadership action.	Clause-level compliance map; direct observation; pupil/staff discussion; sampled records; proprietor challenge.
Education (Independent School Standards) Regulations 2014, regulation 2 and Schedule	The proprietor must meet every applicable standard at all times. The relevant Schedule paragraphs must be translated into practice, records and oversight.	ISS compliance map; proprietor minutes; sampled operational evidence; dated corrective-action record.
UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025	Personal data must be processed lawfully, fairly, transparently, securely and for defined purposes. Rights requests and complaints must follow statutory timescales; safeguarding information may be shared where lawful and necessary.	Record of processing; privacy information; retention schedule; rights-request log; breach and complaint decisions.

Equality Act 2010, Parts 6 and 11 and Schedule 10	The school must not discriminate, harass or victimise; it must make reasonable adjustments for disabled pupils and maintain an accessibility plan.	Adjustment record; accessibility plan; equality analysis; participation and outcome review.
Consumer Rights Act 2015 where parent contracts apply	The policy owner checks the current text, commencement and application to the school, then converts the duty into a named control.	Current-source check; local implementation note; operational record; LENS sample.

Definitions and interpretation

Concern: A matter that may be resolved informally but must be escalated if safeguarding, safety or serious misconduct is indicated.

Formal complaint: An expression of dissatisfaction submitted for consideration under the formal stage.

Panel hearing: The stage-three hearing before at least three people not directly involved, including one person independent of management and running of the school.

Data protection complaint: A complaint about processing personal data, handled under the UK GDPR/DPA route and section 164A requirements.

Vexatious: A description of behaviour, not a label applied merely because a person is persistent or dissatisfied.

Finding: The panel or investigator's reasoned conclusion on each element of the complaint.

Must: A mandatory requirement. Departure requires a lawful basis, recorded authority and prompt review.

Should: Expected practice unless a recorded, defensible reason makes another approach safer or more lawful.

Record: A dated, attributable account of facts, decision, rationale, action, communication and review.

Competent person: A person with the knowledge, training, experience and authority needed for the assigned task.

Proprietor: The legal person or body responsible for the school and compliance with the Independent School Standards.

Pupil voice: The pupil's wishes, feelings and experience obtained in a communication method they can use.

TRIBE, LENS and the Empowerment Pathway

The school applies this parent complaints, independent panel and data protection complaints through its values, quality model and pupil-planning framework.

TRIBE value	Required behaviour
Trust	Give accurate information, explain decisions and act on concerns.
Respect	Protect dignity, privacy, identity, communication and rights.
Impact	Test what changed for pupils, rather than counting activity alone.
Belonging	Build safe participation and remove barriers to inclusion.
Enable	Give pupils and staff the knowledge, tools and support to act.

LENS quality tests

LENS	Question	Evidence
Learning	Do people know the policy and apply it in daily decisions?	Induction, supervision, pupil learning, debriefs
Environment	Do premises, systems, resources and routines support safe practice?	Observation, checks, accessibility, technology

Nurture	Does practice preserve dignity, relationship, regulation and participation?	Pupil voice, adjustments, support plans
Safeguard Quality	Do records, escalation, challenge and action show safe governance?	Chronologies, audit, referrals, proprietor action

Empowerment Pathway: Prepare supports Finding Wings; Transform and Heal support First Flight; Inspire supports Fly the Nest. The pathway records pupil goals, safety, skills, relationships and next steps. It does not replace an EHC plan, safeguarding action, healthcare plan or professional assessment.

Responsibilities

Proprietor: Approves the policy, provides resources, receives serious gaps and holds leaders to account.

Headteacher: Implements the policy, assigns competent leads, checks daily practice and escalates matters outside authority.

Headteacher / Governance Lead: Maintains procedures, advice, training, records, sampling and improvement action for this subject.

DSL and SENCO: Advise on safeguarding, SEND, communication, equality and pupil-specific plans.

All staff and volunteers: Follow the policy, act on concern, record accurately, attend training and report weak controls.

Pupils and parents: Receive accessible information, contribute views and raise concerns without disadvantage.

Mandatory operating standards

1. The published procedure has three stages: informal resolution, formal written complaint and independent panel hearing.
2. The school states clear timescales, contact routes, support and adjustments and keeps parents informed about delay.
3. A panel has at least three people not directly involved, with one person independent of management and running of the school.
4. Parents may attend and be accompanied; the panel makes findings and recommendations and provides them to required people.
5. Complaint records state outcome, action and correspondence and remain confidential except where law permits disclosure.
6. Data-protection complaints follow the statutory acknowledgement and investigation duties and explain the right to contact the Information Commissioner.

Accountable operating controls

The following controls convert the policy into assigned, testable practice. The named owner may delegate an action but remains responsible for checking completion and escalating failure.

No.	Required control	Accountable lead	Evidence	Frequency	Escalation
1	The published procedure has three stages: informal resolution, formal written complaint and independent panel hearing.	Headteacher / Governance Lead	Complaint register	At each event	Immediate escalation for danger, safeguarding risk or unlawful practice.
2	The school states clear timescales, contact routes, support and adjustments and keeps parents informed about delay.	Headteacher	Stage records	Weekly operational check	Escalate missed action or repeated weakness to the Headteacher.

3	A panel has at least three people not directly involved, with one person independent of management and running of the school.	Proprietor / named reviewer	Panel appointment and independence check	Termly LENS sample	Escalate material non-compliance or overdue high risk to the proprietor.
4	Parents may attend and be accompanied; the panel makes findings and recommendations and provides them to required people.	Headteacher / Governance Lead	Hearing papers	Annual proprietor review	Immediate escalation for danger, safeguarding risk or unlawful practice.
5	Complaint records state outcome, action and correspondence and remain confidential except where law permits disclosure.	Headteacher	Findings and recommendations	At each event	Escalate missed action or repeated weakness to the Headteacher.
6	Data-protection complaints follow the statutory acknowledgement and investigation duties and explain the right to contact the Information Commissioner.	Proprietor / named reviewer	Action closure	Weekly operational check	Escalate material non-compliance or overdue high risk to the proprietor.

Three-stage complaints route

Stage 1 is an informal concern to the relevant member of staff, normally acknowledged within two school days and addressed within ten school days. A safeguarding, whistleblowing, staff-allegation or data-protection matter is moved immediately to its correct route.

Stage 2 is a written formal complaint to the Headteacher, or to the proprietor if it concerns the Headteacher. The school acknowledges within three school days, investigates fairly and aims to issue a reasoned written response within fifteen school days.

Stage 3 is a panel hearing requested after stage 2. The panel has at least three people not directly involved, with one person independent of management and running of the school. Parents may attend and be accompanied. Findings and recommendations are sent to the complainant, proprietor, Headteacher and person complained about where relevant.

If local timescales cannot be met, the school explains why and gives a revised date. Contractual deadlines are not used to refuse a safeguarding concern or a statutory information-rights complaint.

Complaints record and confidentiality

The school records every formal complaint, the stage, action, outcome and whether it was upheld. Panel findings and recommendations are available for inspection by the proprietor and Headteacher and are retained in line with the schedule.

Correspondence, statements and panel material are confidential except where law, inspection or safeguarding disclosure requires otherwise. The pupil is not disadvantaged because a parent or pupil complained.

A data-protection complaint is acknowledged within 30 days under section 164A of the Data Protection Act 2018 as amended, investigated without undue delay and answered promptly with the outcome and available review/ICO route.

Policy-specific operating procedure

This procedure applies at each relevant event. Immediate safety and statutory referral take priority over the sequence where delay may increase harm.

Step	Decision point	Required action	Owner	Record / completion test
1	Recognise and act	The published procedure has three stages: informal resolution, formal written complaint and independent panel hearing.	Headteacher / Governance Lead	Complaint register
2	Assess and decide	states clear timescales, contact routes, support and adjustments and keeps parents informed about delay.	Headteacher / delegated competent lead	Stage records

3	Control, record and review	A panel has at least three people not directly involved, with one person independent of management and running of the school.	Headteacher / Governance Lead	Panel appointment and independence check
4	Control, record and review	Parents may attend and be accompanied; the panel makes findings and recommendations and provides them to required people.	Headteacher / delegated competent lead	Hearing papers
5	Control, record and review	Complaint records state outcome, action and correspondence and remain confidential except where law permits disclosure.	Headteacher / Governance Lead	Findings and recommendations
6	Control, record and review	Data-protection complaints follow the statutory acknowledgement and investigation duties and explain the right to contact the Information Commissioner.	Headteacher / delegated competent lead	Action closure

Decision and response sequence

1. Identify the concern, duty, change or required action and check immediate safety.
2. Contact the named lead: Headteacher / Governance Lead.
3. Check the pupil's plans, communication, SEND, equality, medical and safeguarding information.
4. Apply the linked SOP and seek specialist or external advice when the threshold requires it.
5. Record facts, rationale, consultation, action, owner and review time.
6. Explain the decision to the pupil and relevant adults in an accessible form within lawful confidentiality limits.
7. Review impact through LENS and escalate failed, repeated or overdue action.

Records and evidence

- Complaint register
- Stage records
- Panel appointment and independence check
- Hearing papers
- Findings and recommendations
- Action closure

Records use factual language, identify author and time, preserve amendments and follow the retention schedule. Safeguarding records remain separate and transfer through the safeguarding-records SOP.

Training and communication

- Role-specific induction before unsupervised or high-risk activity.
- Refresher learning after legal change, incident, audit finding or evidence of weak practice.
- Accessible pupil and parent information about rights, expectations and help routes.
- Competence checks for practical tasks; attendance alone does not show competence.

Monitoring, review and escalation

- The policy owner samples implementation at least termly and reports risk and action through LENS.
- The Headteacher reports serious breach, safeguarding weakness and overdue high-risk action to the proprietor promptly.
- The proprietor reviews this policy at least annually and after material legal, registration, premises or service change.
- A failure to follow this policy may lead to safeguarding, capability, disciplinary, contractual or regulatory action.

LENS assurance and audit schedule

LENS domain	Test	Sample	Reviewer	Timing
Learning	Sample complaint register against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Termly
Environment	Sample stage records against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Half-termly
Nurture	Sample panel appointment and independence check against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Termly
Safeguard Quality	Sample hearing papers against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Half-termly
Learning	Sample findings and recommendations against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Termly
Environment	Sample action closure against the policy requirement and verify the recorded action happened in practice.	At least five records or all records where fewer; include one recent and one higher-risk case.	Named lead	Half-termly

Action closure rule: A finding closes only when evidence shows the control was implemented and the intended result was checked. Repeated, overdue or high-risk findings reach the Headteacher and proprietor with a named action and date.

Linked procedures

- SOP-24 Parent complaint and independent panel
- SOP-25 Data breach, SAR and information-rights response

Authoritative sources

The policy owner checks the current version and commencement date before approval and after any announced amendment.

- [Independent School Standards guidance, April 2026](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Keeping Children Safe in Education](#)
- [Working Together to Safeguard Children 2026](#)
- [Ofsted independent school inspection materials](#)
- [Relationships, Sex and Health Education guidance](#)
- [Working together to improve school attendance 2026](#)
- [Data protection in schools](#)
- [Prevent duty guidance](#)
- [Restrictive interventions including reasonable force in schools](#)

Local implementation schedule

Local field	Approved detail
School legal name	Illuminate You
Proprietor legal entity and contact	Jon Corr and Stuart Nicholl Jon@illuminatecaregroup.co.uk Staurt@illuminatecaregroup.co.uk
Headteacher	Derrick Education@illuminatecaregroup.co.uk
DSL and deputies	Derrick – DSL and Sarah Deputy DSL Safeguarding@illuminatecaregroup.co.uk

Approved by: _____ Role: _____ Date: _____