Parental Complaints Procedure

Reviewer: Darren Carpenter, February 2026
Applicable to College (including EYFS setting)

1. Background

Hurst has long prided itself on the quality of the teaching and pastoral care provided to its pupils. However, if parents do have a complaint, they can expect it to be treated by the College with care and in accordance with this procedure.

Hurst makes its complaints procedure available to all parents of pupils and of prospective pupils on the College's website and will ensure that parents of pupils and of prospective pupils who request it are made aware that this document is published or available and the form in which it is published or available and of the number of complaints registered under the formal procedure during the preceding school year (included in section 10 of this document). In accordance with paragraph 32(1) of Schedule 1 to the Education (Independent School Standards) Regulations 2014, Hurst will also make available, on request, to Ofsted, the Department for Education (DfE) or the Independent Schools Inspectorate (ISI), details of this Complaints Procedure and the number of complaints registered under the formal procedure during the preceding school year.

Although this Procedure is made available to parents of prospective pupils, it is not available for use by them; it may only be used by parents of current pupils.

Complaints by parents of former pupils will be dealt with under this Complaints Procedure only if the complaint was initially raised when the pupil to which the complaint relates was still registered as a pupil at the School. The only exception to this is if the complaint is a review of a decision taken by the Head of College to exclude or require the removal of a pupil under clause 7 of the School's Terms and Conditions in which case such a review must be requested by no later than five working days from the date of the decision to exclude or require the removal of a pupil.

"Parent(s)" means the holder(s) of parental responsibility for a current or prospective pupil about whom the complaint relates

2. What Constitutes a Complaint?

A complaint is an expression of dissatisfaction with a real or perceived problem. It may be made about the College as a whole, about a specific department or about an individual member of staff, and any matter about which a parent is unhappy and seeks action by the College is within the scope of this procedure. A complaint is likely to arise if a parent believes that the College has done something wrong, failed to do something that it should have done or has acted unfairly.

Any concern relating to safeguarding or child protection will be handled in accordance with the College's Safeguarding and Child Protection Policy. In such cases, aspects of this Complaints Procedure may be superseded in order to protect pupils and comply with statutory guidance. Similarly, any complaint concerning the College's handling of personal data will be dealt with in accordance with section 8 (Data Protection Complaints) of this Procedure.

Parents can be assured that all concerns and complaints will be treated seriously and confidentially. The College is here for your child, and you can be assured that your child will not be penalised for a complaint that you raise in good faith.

3. Timeframe for Dealing with Complaints

All complaints will be handled seriously and sensitively. They will be acknowledged within five working days if received during term time and as soon as practicable during holiday periods. It is in everyone's interest to resolve a complaint as speedily as possible: the College's target is to complete the first two stages of the procedure within 28 days if the complaint is lodged during term-time and as soon as practicable during holiday periods. In the case of a particularly complex complaint, the College may need to extend the timescale to conduct a suitable investigation.

Stage 3, the Appeal Panel Hearing, will usually be completed within a further 28 days if the appeal is lodged during term-time and as soon as practicable during holiday periods.

Complaints should normally be raised within three months of the matter arising, unless there are exceptional circumstances.

4. Anonymous Complaints

Anonymous complaints will be considered at the discretion of the College. The College may decide not to investigate anonymous complaints where there is insufficient information to do so, unless the complaint relates to safeguarding or serious misconduct.

5. The Complaints Procedure

Stage 1 – Informal Resolution

- It is hoped that most complaints and concerns will be resolved quickly and informally.

- If parents have a complaint, they should initially contact the person most closely concerned with the issue. This could be either the Form teacher (in the Junior and Senior Prep Schools), the Head of Year or Head of Department (for academic matters), the Housemaster/mistress (for pastoral matters), or the Director of Finance (for fee-related matters).

- In the majority of cases, the matter will be resolved straightaway by this means to the parents' satisfaction, but if the person contacted cannot resolve the matter alone it may be necessary for them to consult the Head or Deputy Head of the Senior school, or the Heads of the Prep Schools, or the Chief Financial Officer.

- Complaints made directly a Deputy Head or a Head of Section, or the Chief Financial Officer or Chief Operating Officer will usually be referred to the relevant Form teacher/Head of Year/Head of Department/ Housemaster/Housemistress unless the Head/Deputy Head/Chief Financial Officer/ Chief Operating Officer deems it appropriate for him/her to deal with the matter personally.

- The person receiving the complaint will make a written record of all concerns and complaints and the date on which they were received. Should the matter not be resolved within a reasonable time frame, usually ten working days, or in the event that the person receiving the complaint and the parent fail to reach a satisfactory resolution then parents will be advised to proceed with their complaint in accordance with stage 2 of this procedure.

- Where the complaint is against a Deputy Head of a Head of Section, parents should make their complaint to the Head of College.

- Where the complaint is against the COO or the CFO, parents should make their complaint to the Head of College.

- If however, the complaint is against the Head of College, parents should make their complaint directly in writing to the Chair of Governors, who may be contacted via the Chief Financial Officer in his role as Clerk to Governors.

- Complaints raised via social media or other public forums will not normally be treated as formal complaints unless they are subsequently submitted in writing in accordance with this procedure. This does not, however, apply to data protection complaints, which will be accepted however they are received (see section 8 below).

Stage 2 – Formal Resolution

- If the issue cannot be resolved on an informal basis, then the parents should put their complaint in writing to the Head of College. The Head of College will decide, after considering the complaint, the appropriate course of action to take. This may involve delegating the matter to an appropriate senior member of staff if they have not previously been involved.

- In most cases, the Head of College or the delegated member of senior staff dealing with the complaint, will meet with the parents concerned, normally within 5 working days of receiving the written complaint, to discuss the matter. If possible, a resolution will be reached at this stage.

- If further investigations are necessary, the Head of College (or another appropriate senior member of staff appointed by the Head of College) will undertake these.

- The person undertaking the investigations will keep written records of all meetings and interviews held in relation to the complaint.

- Once the Head of College is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made and parents will be informed of this decision in writing. The Head of College will also give reasons for his/her decision.

- If the complaint is against the Head of College, the Chair of Governors will call for a full report from the Head of College and for all the relevant documents. The Chair may also call for a briefing from relevant members of staff, and will in most cases, speak to or meet with the parents to discuss the matter further. Once the Chair is satisfied that, so far as is practicable, all of the relevant facts have been established, the parents will be informed of the decision in writing. The Chair will give reasons for his/her decision.

- If parents are still not satisfied with the decision, they should proceed to stage 3 of this procedure.

- The College may suspend the complaints process where the matter becomes subject to legal proceedings or formal investigation by an external body.

Stage 3 – Panel Hearing

- If parents seek to invoke stage 3 (following a failure to reach an earlier resolution) they should contact the Chair of Governors within five days of receiving the decision at stage 2, setting out their grounds of appeal. Any supporting evidence which the parents wish to rely on should also be provided with their grounds of appeal.

- The Clerk to Governors will refer the appeal to the complaints panel for consideration. The panel will consist of three persons not directly involved in the matters detailed in the complaint and one of whom will be independent of the management and running of the College and not involved in the governance or employment of the College. The Chair of Governors will appoint one Panel member to act as Chair of the Panel. The Chair of Governors, on behalf of the panel, will then acknowledge the complaint and schedule a hearing to take place as soon as practicable and normally within 20 days.

- If the panel deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the hearing. Copies of such particulars shall be supplied to all parties normally not later than 5 working days prior to the hearing.

- The parents may attend the hearing and be accompanied to the hearing by one other person if they wish. This may be a relative, teacher or friend. Legal representation will not normally be appropriate. The Panel will decide whether it would be helpful for witnesses to attend.

- The remit of the Panel shall be at the discretion of the Chair of Governors and the manner in which the hearing is conducted shall be at the discretion of the Panel.

- If possible, the panel will resolve the parents' complaint without the need for further investigation. Where further investigation is required, the panel will decide how it should be carried out.

- After due consideration of the merits of the complaint and all facts they consider relevant, the Panel will make findings as to whether or not the Stage 2 decision was a reasonable one and decide whether to:
    - dismiss the complaint(s) in whole or in part;
    - uphold the complaint(s) in whole or in part; and
    - make recommendations.

- The Panel will write to the parents informing them of its decision and the reasons for it, normally within 5 working days of the hearing (although additional time may be required if it is necessary to carry out further investigations following the hearing). The decision of the Panel will be final. A copy of the Panel's findings and recommendations (if any) will be sent by electronic mail or otherwise given to the parents, and, where relevant, the person complained about as well as the Chair of Governors and the Head of College. A copy of the Panel's findings and recommendations (if any) will also be available for inspection on the School premises by the Chair of Governors and the Head of College.

6. Recording Complaints

The College will keep a written record of all formal complaints (i.e., those not resolved at stage 1) and whether they are resolved at stage 2 or proceed to a panel hearing and any action taken by the School as a result of the complaint (regardless of whether the complaint is upheld).

The School processes data in accordance with its Privacy Notice. When dealing with complaints the School (including any Panel member appointed under the Stage 3 process) may process a range of information, which is likely to include the following:

- Date when the issue was raised
- Name of parent
- Name of pupil
- Description of the issue
- Records of all the investigations (if appropriate)
- Witness statements (if appropriate)
- Name of member (s) of staff handling the issue at each stage
- Copies of all correspondence on the issue (including emails and records of phone conversations)
- Notes/minutes of the hearing and the panel's written decision
- At the College's discretion, additional records may be kept of other complaints.

This may include 'special category personal data' as further detailed in the College's Data Protection Policy, but potentially including, for instance, information relating to physical or mental health where this is necessary owing to the nature of the complaint. This data will be processed in accordance with the School's Data Protection Policy.

The School will keep records of formal complaints and Complaints Panel hearings, as required by regulation. It will do so in accordance with its Data Protection Policy and Retention of Records Schedule.

7. Unreasonable and unreasonably persistent complaints

The College is committed to dealing with all complaints fairly and impartially, and to providing a high quality service to those who complain. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive or threatening.

A complaint may be regarded as unreasonable when the person making the complaint:

- introduces trivial or irrelevant information which the complainant expects to be taken into account and commented on, or raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales;
- makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- uses threats to intimidate
- uses abusive, offensive or discriminatory language or violence
- publishes unacceptable information on social media or other public forums.

Whenever possible, the Head of College or Chair of Governors will discuss any concerns with the complainant informally before making a judgement that their complaint is unreasonable.

If the behaviour continues the Head of College will write to the complainant explaining that their behaviour is unreasonable and asking them to change it. For complainants who excessively contact the College causing a significant level of disruption, we may specify methods of communication and limit the number of contacts in a communication plan. This will usually be reviewed after 6 months.

In response to any serious incident of aggression or violence, the concerns and actions taken will be put in writing immediately and the police informed. This may include banning an individual from our College site.

Most complaints raised will be valid, and therefore we will treat them seriously. However, a complaint may become unreasonable if the person:

- Has made the same complaint before, and it has already been through the College's complaints procedure
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive
- Knowingly provides false information
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure
- Pursues a valid complaint, but in an unreasonable manner e.g., refuses to articulate the complaint, refuses to co-operate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out
- Changes the basis of the complaint as the investigation goes on
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value.

Steps we will take

We will take every reasonable step to address the complainant's concerns and give them a clear statement of our position and their options. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal wherever possible.

If the complainant continues to contact the school in a disruptive way, we may put communications strategies in place. We may:

- Give the complainant a single point of contact via an email address, and an appropriate time window for communication
- Limit the number of times the complainant can make contact, such as a fixed number per term
- Ask the complainant to engage a third party to act on their behalf, such as Citizens Advice
- Put any other strategy in place as necessary.

Stopping responding

We may stop responding to the complainant when all of these factors are met:

- We believe we have taken all reasonable steps to help address their concerns
- We have provided a clear statement of our position and their options
- The complainant contacts us repeatedly, and we believe their intention is to cause disruption or inconvenience and / or he or she is making substantially the same points each time

Where we stop responding, we will inform the individual that we intend to do so. We will also explain that we will still consider any new complaints they make.

8. Data Protection Complaints

From 19 June 2026, section 164A of the Data Protection Act 2018 (inserted by the Data (Use and Access) Act 2025) provides individuals with a statutory right to complain directly to the College where they consider that the College has infringed data protection legislation (the UK GDPR or the Data Protection Act 2018) in connection with the processing of their own personal data. This section sets out how the College will handle such complaints ("data protection complaints") and applies to any data protection complaint received on or after 19 June 2026.

A data protection complaint is any expression of dissatisfaction relating to the College's handling of the complainant's own personal data. This might include, for example, a concern about how personal data has been collected, used, shared, kept secure or retained, or about the handling of a data subject rights request. A complaint does not need to use legal language, refer to data protection legislation or be labelled as a data protection complaint in order to fall within this section. Although this Procedure is otherwise available only to parents of current pupils, the right to make a data protection complaint applies to any individual whose personal data the College processes, including pupils, parents, prospective and former pupils and their parents, and other members of the public.

Making a data protection complaint

Data protection complaints may be made:

- using the College's data protection complaint form, which is available on the College's website and can be completed and submitted electronically or in hard copy;
- by email or in writing to the College's Data Protection Officer at [email address] or [postal address]; or
- by telephone or in person.

However a data protection complaint is received, including where it is raised by telephone, in person or via social media, it will be accepted and handled in accordance with this section. Any member of staff who receives an expression of dissatisfaction concerning the handling of personal data will pass it to the Data Protection Officer without delay.

How the College will handle a data protection complaint

Data protection complaints will be handled by, or under the oversight of, the Data Protection Officer. The College will:

- acknowledge receipt of the complaint within 30 days of receiving it (in practice, the College will aim to acknowledge receipt within five working days during term time, consistent with section 3 above);
- without undue delay, take appropriate steps to respond to the complaint, including making appropriate enquiries into its subject matter;
- keep the complainant informed of the progress of the complaint; and
- inform the complainant of the outcome of the complaint in writing, with reasons, without undue delay.

Where a complaint contains both data protection elements and other elements, the data protection elements will be handled in accordance with this section and the remaining elements will be handled under the other provisions of this Procedure. The Data Protection Officer and the person handling

the remainder of the complaint will liaise so that, wherever possible, the complainant receives a coordinated response.

Escalation to the Information Commissioner's Office
If the complainant remains dissatisfied with the outcome of their data protection complaint, or with the way in which it has been handled, they have the right to lodge a complaint with the Information Commissioner's Office (ICO) under section 165 of the Data Protection Act 2018. The ICO will generally expect a complainant to have raised the matter with the College in the first instance. The ICO can be contacted:

- by telephone on 0303 123 1113;
- via its website at www.ico.org.uk; or
- by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Complainants may also seek a judicial remedy through the courts.

The College will keep a written record of all data protection complaints received, the action taken and the outcome, in accordance with its Data Protection Policy and Retention of Records Schedule. This record may be requested by the ICO.

9. Complaints relating to Early Years

Parents of EYFS children should follow the three stages of this Complaints Procedure. If parents remain dissatisfied and their complaint is about the School's fulfilment of the EYFS requirements, then parents may take their complaint to the ISI or Ofsted. Parents will be notified by ISI or Ofsted of the outcome of the investigation into their complaint within 28 days of the complaint being received.

Hurst will provide ISI/Ofsted, on request, with a written record of all complaints made during any specified period, and the action which was taken as a result of each complaint. The record of any such complaints will be kept in accordance with its Data Protection Policy and Retention of Records Schedule.

Parents may complain directly to Ofsted or to ISI if they believe the provider is not meeting the EYFS requirements. Schools must make available details of how to contact Ofsted and/ or the ISI:

- Ofsted can be contacted on 0300 123 1231 or by email: enquiries@ofsted.gov.uk
- Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD
- ISI can be contacted on 020 7600 0100, by email: concerns@isi.net or by post to: ISI, CAP House, 9-12 Long Lane, London EC1A 9HA

10. Number of complaints registered during the preceding school year

The number of complaints registered during the academic year 2025-26:
Stage 1 = 6
Stage 2 = 3
Stage 3 = 0