



Complaints Policy

2026-27 revised edition

Policy owner	Board of Trustees
Approval status	Draft for Board approval
Reviewed / updated	3 October 2026
Next scheduled review	September 2027
Scope	Members of the public, service users, parents/carers, donors and other external stakeholders
Earlier review trigger	Relevant legal/regulatory change, serious incident, significant organisational change or identified deficiency

This policy replaces the 2025 complaints policy. It retains AET's staged internal process while clarifying safeguarding, data-protection and fundraising complaints and the circumstances in which external regulators may become involved.

1. Purpose

Axis Educational Trust (AET) aims to provide high-quality, safe and respectful services. Complaints are an important source of feedback and learning. This procedure provides a fair, accessible and proportionate way to raise dissatisfaction and have it considered.

2. What is a complaint?

A complaint is an expression of dissatisfaction about AET's services, actions, omissions or the conduct of a representative, whether made verbally or in writing and whether by an individual or a group. A person does not need to use the word "complaint" for the matter to be treated as one.

3. Principles

- Complaints will be taken seriously and investigated fairly and proportionately.
- AET will aim to resolve complaints as early as possible and without unnecessary delay.
- People will be treated respectfully and will not be disadvantaged for making a complaint in good faith.

- Information will be shared only where needed to investigate, respond, safeguard people or meet legal obligations.
- AET will make reasonable adjustments for disabled people and reasonable efforts to support communication, literacy or language needs.
- A person dissatisfied with a formal response will have an appeal route as set out below.
- AET will record and review complaints to identify learning and service improvements.

4. Who can complain and what is outside this policy?

This procedure is primarily for members of the public, beneficiaries, parents/carers, donors, supporters, partners and other external stakeholders who receive or are affected by an AET service.

Employees, workers, trustees and volunteers should normally use the relevant grievance, disciplinary, whistleblowing or other internal procedure for workplace matters. Where a matter concerns wrongdoing in the public interest, the Whistleblowing Policy may apply.

Safeguarding concerns are not delayed by this complaints procedure. If a complaint indicates that a child or adult may be at risk of harm, AET will follow its safeguarding procedures immediately and may refer the matter to children's social care, the LADO, police or another appropriate authority. This may limit what can be shared with a complainant while safeguarding enquiries are ongoing.

5. Making a complaint

A complaint may be made verbally or in writing. It should include, as far as possible, the complainant's name and contact details, what happened, relevant dates and people, the impact of the issue, any steps already taken, and what outcome is sought. AET will consider anonymous complaints where there is enough information to do so.

6. Stage 1 - informal resolution

Where appropriate, the complainant should first speak to the person concerned or their line manager so the issue can be resolved quickly. A person may instead contact the Chair, Hakan Gokce, at hakan.gokce@axiseducationaltrust.org if they are unsure who should deal with the issue or if direct contact would be inappropriate.

Serious complaints, safeguarding matters, allegations against senior leaders, or matters requiring independent investigation may move directly to Stage 2.

7. Stage 2 - formal complaint

If the matter is not resolved informally, or is unsuitable for informal resolution, the complaint should be sent to the Trustees:

Axis Educational Trust, 16-17 Grand Arcade, London N12 0EH | trustees@axiseducationaltrust.org

1. AET will normally acknowledge the complaint within 7 working days. The acknowledgement will identify the person handling the complaint, indicate any further information required and explain the expected process.
2. The investigator will be sufficiently independent of the matters complained about and will consider relevant documents, speak to relevant people where appropriate and give those criticised a fair opportunity to respond.
3. AET will normally provide a written response within 21 working days from the start of the investigation. If more time is reasonably required, AET will explain the reason and provide a revised target date.
4. The response will explain the investigation, findings, reasons, whether the complaint is upheld in whole or in part, any appropriate remedy or action, and the right of appeal.

8. Stage 3 - appeal

A complainant who is dissatisfied with the Stage 2 response may appeal in writing within 7 working days, explaining the grounds of appeal. An appeal is not normally a complete re-investigation; it considers whether the original decision was reasonable, whether relevant information was overlooked, whether the procedure was fair and whether new evidence materially affects the outcome.

An Appeal Panel, normally of three people and including a trustee where appropriate, will be appointed. Panel members must not have had material prior involvement in the complaint and must declare any conflict of interest.

The panel may review papers, speak to relevant individuals and seek further information. The Chair of the Appeal Panel will normally issue a final appeal response within 28 working days of receiving the appeal, or explain any delay and revised timescale.

9. Process review

After Stages 1 to 3, a complainant who believes the complaints procedure itself was not followed properly or fairly may request a process review within 21 working days of the appeal outcome. This is a review of complaint handling, not a further investigation of the substantive complaint.

The Chair of Trustees, or another independent trustee where the Chair has been involved, will arrange the review and normally communicate the outcome within 28 working days. The process-review decision is final within AET.

10. Time limits and older complaints

AET encourages complaints to be made promptly while evidence is available. AET may decide not to investigate a substantially delayed complaint where a fair investigation is no longer practicable, but it will consider the circumstances, including safeguarding, vulnerability and the seriousness of the issue. Where AET cannot meet a stated timescale, it will explain the delay and provide an adjusted timescale.

11. Complaints about fundraising

AET will handle fundraising complaints in accordance with the Fundraising Regulator's Code of Fundraising Practice (2025). AET will maintain a clear, publicly available fundraising complaints procedure, investigate fundraising complaints thoroughly and fairly, respond appropriately, avoid unnecessary delay, and use learning to improve future fundraising. Fundraising partners must follow an appropriate complaints procedure.

12. Data protection complaints

A complaint about AET's use of personal data will also be handled under the Data Protection Policy. Current law requires AET to provide an appropriate complaints mechanism, acknowledge a data protection complaint within 30 days, investigate it appropriately and communicate the outcome without undue delay. Where both this policy and the data-protection procedure apply, AET will coordinate them so the complainant is not required to duplicate the complaint.

13. Unreasonable, abusive or repetitive behaviour

AET will not label a complaint unreasonable merely because it is persistent or difficult. However, it may take proportionate steps where behaviour becomes abusive, threatening, discriminatory, harassing, excessively repetitive, or places unreasonable demands on staff after the complaint has been properly considered. Any restrictions will be justified, documented, proportionate and communicated, with reasonable adjustments considered where relevant.

14. External routes after AET's procedure

The Charity Commission is the regulator of charities in England and Wales, but it is not a general ombudsman for dissatisfaction with a charity's standard of service. It prioritises serious regulatory concerns such as significant harm, serious misconduct or mismanagement, significant loss of charity assets, criminal or terrorist activity, or other matters within its regulatory remit.

Depending on the nature of the complaint, an external route may include:

- Charity Commission for England and Wales - serious regulatory concerns about a charity;
- Fundraising Regulator - unresolved complaints about charitable fundraising within its remit;
- Information Commissioner's Office (ICO) - personal data and data protection concerns;
- local authority safeguarding services / LADO or police - safeguarding or criminal concerns; and
- another relevant statutory regulator or authority where the service or activity is within its jurisdiction.

AET will provide appropriate signposting in its final response where it is clear which external body is relevant.

15. Records, confidentiality and learning

Complaint records will be stored securely and retained in accordance with AET's retention schedule. Information will be limited to those who need it for investigation, governance, safeguarding, legal or regulatory purposes. The Board will periodically review complaint themes and actions so that recurring issues lead to service improvement.

16. Key regulatory references

- [Charity Commission - Raising a concern with the Charity Commission \(CC47\), updated 21 April 2026](#)
- [Fundraising Regulator - Code of Fundraising Practice \(2025\)](#)
- [Fundraising Regulator - Complaints handling guidance \(updated 3 November 2025\)](#)
- [ICO - New data protection complaints law in force](#)

Reviewed by: Hakan Gokce