



# Complaints Policy

**Recommended by:** Head of Governance

**Approved by:** Trust Board

**Signed:**

**Position on the Board:** Chair

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### 1. Introduction and Purpose of Policy

Central Region Schools Trust is committed to working in partnership with parents, carers, pupils and the wider community and recognises that concerns or complaints may arise from time to time. We view complaints as an opportunity to listen, learn and improve, and are committed to ensuring that all complaints are handled fairly, respectfully and transparently, with an emphasis on early and informal resolution wherever appropriate.

Where matters cannot be resolved informally, the Trust will follow a clear and consistent procedure to ensure complaints are considered thoroughly, impartially and without prejudice. CRST is committed to ensuring that no individual is disadvantaged for raising a concern and that all parties are treated with dignity and courtesy throughout the process, while also supporting staff, governors and trustees through a proportionate, non-adversarial approach that complies with statutory requirements and Department for Education (DfE) guidance.

This policy outlines the procedure that the complainant and Trust will follow. Once a complaint has been made, it can be resolved or withdrawn at any stage.

If you wish to raise a concern, in the first instance you should contact the appropriate staff member at the individual School. Should you have a general concern or wish for independent advice and guidance at any stage of the process, please contact [governance@crst.org.uk](mailto:governance@crst.org.uk) and a member of the Governance Team will advise you appropriately.

## **2. Legislative and Regulatory Framework**

This policy has due regard to the following legislation and statutory guidance:

- [Freedom of Information Act 2000](#)
- [Education Act 2002](#)
- [Equality Act 2010](#)
- [The Education \(Independent School Standards\) Regulations 2014](#)
- [UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018 \(as amended by the Data \(Use and Access\) Act 2025\)](#)
- [DfE Best practice guidance for academies complaints procedures](#)
- [Academy Trust Handbook](#)

## **3. Definitions**

For the purpose of this policy, a “complaint” is defined as ‘an expression of dissatisfaction’ towards the actions taken or a perceived lack of action. Complaints can be resolved formally or informally. A “concern” is defined as ‘an expression of worry or doubt’ where reassurance is required. Any complaint or concern will be taken seriously, whether raised formally or informally, and the appropriate procedures will be implemented.

The definition of “unreasonable complaints” is outlined in the ‘Serial, Persistent and Unreasonable complaints’ section of this policy.

For the purpose of this policy, “duplicate complaints” are identical complaints received from a complainant’s spouse, partner or child. These complaints will not be addressed again and the individual making the second complaint will be informed that the complaint has been dealt with.

## **4. General Principles**

The majority of issues raised by parents/carers, the community or pupils/students, are concerns rather than complaints. We are committed to resolving all concerns and complaints at the earliest possible point in the process, informally where possible, and where this is not possible, at the earliest point within the formal process.

Formal complaints should normally be raised within three months of the incident to which they relate. Where a complaint concerns a series of related issues, it should be raised within three months of the most recent incident.

In exceptional circumstances, the Trust may consider complaints outside this timeframe where there are valid reasons for the delay and where the complaint can still be investigated fairly and proportionately. Each case will be considered on its individual merits.

Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the 2008 Act request access to them.

To ensure that complaints are investigated fairly, thoroughly, and within published timescales, complainants are asked to limit the number of communications with the School /Trust while a complaint is being progressed.

Once a complaint has been formally acknowledged, a single named point of contact will normally be provided. All correspondence should be directed to this contact unless the School/ Trust advises otherwise.

Repeated or fragmented communications, particularly where they raise the same issues, may divert time away from progressing the investigation and responding substantively to the complaint. Where additional information becomes available that is relevant to the complaint, it should be submitted clearly and, where possible, in a single communication.

## 5. Complaints dealt with outside of the Complaints Policy

Subject Matter	Relevant Procedure
Pupil Suspensions/ Exclusions	<p>Right to make representations about Suspensions to Governor Panel.</p> <p>Right of appeal to Independent Review Panel following the outcome of a permanent exclusion panel hearing.</p> <p>Contact <a href="mailto:governance@crst.org.uk">governance@crst.org.uk</a></p>
Admissions Appeals	<p>Right of appeal to independent panel if admission refused.</p> <p>Contact school office and see Admissions page on the schools website.</p>
Special Educational Needs Provision	<p>Special circumstances may apply in relation to certain aspects of a SEND related complaint. Please contact the school's SENDCo for further information in the first instance for guidance.</p> <p>Contact school office.</p>
Data Protection related complaints	<p>Complaints relating to the handling of personal data, including subject access requests, data accuracy, data sharing, retention, or security, are subject to a separate statutory process under data protection legislation and are not dealt with under this complaints procedure.</p> <p>Such complaints should be raised in accordance with the Trust's data protection arrangements. Individuals retain the right to escalate data protection complaints to the Information Commissioner's Office once the Trust's internal process has been completed.</p> <p>See Data Protection Policy available to view on the school's and Trust website</p>
Safeguarding and Child Protection	<p>Where safeguarding concerns arise, the Trust will follow its safeguarding and child protection procedures in line with <i>Keeping Children Safe in Education</i>, which take precedence over this complaints procedure.</p> <p>See Safeguarding Policy available on the school and Trust website or contact the school office.</p>
Whistleblowing	<p>Refer to the internal whistleblowing procedures outlined in the Whistleblowing Policy.</p> <p>See Whistleblowing Policy available to view on the school's and Trust website</p>
Staff conduct	Referred to the internal disciplinary procedures
Third-party suppliers using school premises or facilities	The school will ensure any third-party supplier using school premises or facilities to offer community facilities or services has its own complaints procedures in place and such complaints do not fall within the scope of this policy. All other complaints will be directed towards the procedures laid out in this policy.

## 6. Serial, Persistent and Unreasonable Complaints

The Trust is committed to dealing with complaints fairly and thoroughly. The vast majority of complainants pursue complaints appropriately and will be treated with courtesy and respect at all times.

A complaint will not be regarded as unreasonable solely because it is complex, emotive, raises serious issues, or because the complainant is persistent in seeking resolution.

However, in a small number of cases, a complaint may become unreasonable where the complainant's behaviour significantly hinders the Trust's ability to consider or progress the complaint fairly, proportionately, or within reasonable timescales.

Complainants should try to limit their communication with the school/ Trust whilst the complaint is being investigated. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text), as it could delay the outcome being reached.

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing.

### **Unreasonable complaints**

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

- Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
- Refuses to co-operate with the complaints investigation process
- Refuses to accept that certain issues are not within the scope of the complaints procedure
- Insists on the complaint being dealt with in ways which are incompatible with the complaints 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, 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
- 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, including referral to the DfE
- Seeks an unrealistic outcome
- Makes excessive demands on school time by frequent, lengthy and complicated 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

Please note: the above list is not intended to be exhaustive and is for guidance purposes only. It is at the discretion of the School /Trust what is deemed to be unreasonable.

### **Steps we will take:**

We will take every reasonable step to address the complainant's comments 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 (as outlined above) wherever possible.

Whenever possible, the School/Trust will discuss any concerns with the complainant informally before applying an 'unreasonable' marking.

If the behaviour continues, the School/Trust will write to the complainant explaining that their behaviour is unreasonable, refer them to this policy and remind them to act in accordance with it.

For complainants who excessively contact the school causing a significant level of disruption, we may:

- Give the complainant a single point of contact via an email address
- Limit the number of times the complainant can make contact, such as a fixed number per term
- Put any other strategy in place as necessary

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from school premises and ensuring appropriate measures of support are provided to staff where they are the subject of aggression and/or violence.

### **Serial/persistent/duplicate complaints**

If the complainant contacts the School/Trust again on the same issue, the correspondence may then be viewed as 'serial' or 'persistent'. We may stop responding to the complainant when the following conditions are met:

- We have taken every reasonable step to address the complainant's concerns
- The complainant has been given a clear statement of our position and their options
- The complainant contacts the school/trust repeatedly, making substantially the same points each time
- The complainant's communications are often or always abusive or aggressive
- The complainant makes insulting personal comments about or threats towards staff
- We have reason to believe the individual is contacting the school/trust with the intention of causing disruption or inconvenience

A decision to stop responding will only be considered in circumstances where the following statements are true:

- Every reasonable step has been taken to address the complainant's concerns.
- The complainant has been given a clear statement of the trust's position and their options.
- The complainant contacts the School repeatedly, making substantially the same points each time

If the above criteria are met, in making a decision to stop responding, the School will also consider if the complainant is often abusive or aggressive in their communication, makes insulting personal comments about or threats towards staff, or if the School believes their intent is to disrupt or inconvenience the School .

Where we decide to stop responding, we will inform the individual that we intend to do so. We will also explain that we will consider any new complaints they make provided the concerns raised are materially different to those raised previously and/or are unconnected to the previous concern

If the School/Trust has resolved a complaint under this procedure and received a duplicate complaint on the same subject from a partner, family member or other individual, the school/trust will assess whether there are aspects that we hadn't previously considered, or any new information that needs to be taken into account.

If the School/Trust is satisfied that there are no new aspects, it will:

- Tell the new complainant that the issue has already been investigated and responded to, and that the local process is complete

- Direct them to the DfE if they are dissatisfied with the original handling of the complaint

If a duplicate complaint is raised which in the view of the school / trust warrants further consideration, the complaints procedure will be repeated.

## **7. Use of Digital Tools, Including Artificial Intelligence (AI)**

The Trust recognises that complainants may use digital tools, including artificial intelligence (AI), to assist in drafting correspondence. Complaints will not be treated differently on the basis that such tools may have been used.

Where the form or content of correspondence makes a complaint unclear, excessively lengthy, or includes inaccurate, irrelevant, or sensitive material, the Trust may seek clarification in order to focus on the substantive issues raised and to support early and effective resolution.

All complaints will be considered fairly, proportionately, and in accordance with this policy, regardless of the format, method, or tools used to submit them.

## **8. Resolving complaints**

At each stage of the complaint's procedure, the School is committed to resolving the complaint. Where appropriate, the School/ Trust will acknowledge that the complaint is upheld in whole or in part, and may offer one of the following:

- An explanation.
- An admission that the situation could have been handled better.
- An assurance that the School/ Trust will try and ensure the incident will not occur again.
- An outline of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which changes will be made.
- An undertaking to review School/ Trust policies in light of the complaint.
- An apology.

## **9. Withdrawal of a complaint**

Where a complainant wishes to withdraw their complaint, the School/ Trust will ask them to confirm this in writing. Despite the complaint having been withdrawn, the School/ Trust will still take the complainant's voice seriously and attempt to avoid causing similar distress to others in the future. The School/ Trust will not under any circumstances ask, or pressure an individual, to withdraw a complaint.

## **10. Record keeping**

A written record shall be kept of any complaints stage 2 and above, whether made via phone, in person or in writing, detailing:

- The main issues raised, the findings and any recommendations.
- Whether the complaint was resolved following an informal route, formal route or panel hearing.
- Actions taken by the School/ Trust as a result of the complaint (regardless of whether the complaint was upheld).

The decision to make a recording sits with the School or Trust, taking account of accessibility needs and data protection considerations.

Where there are communication difficulties or disabilities, the School/ Trust may provide recording devices to ensure the complainant is able to access and review the discussions at a later point. Recording devices will not be used without the prior consent of all parties.

The School/ Trust will not accept as evidence any recordings that were obtained covertly and without the informed consent of all parties being recorded.

Complainants have a right to access copies of these records under the UK GDPR and the Freedom of Information Act 2000. The School/ Trust will hold all records of complaints from each School, as well as those regarding the Trust itself, centrally. Correspondence, statements and records relating to individual complaints are kept confidential except where the Secretary of State or a body conducting an inspection request to access them.

### **11. Exceptional circumstances**

The DfE expects complainants to have completed the Trust's complaints procedure before directing a complaint to them. The exceptions to this include when:

- Pupils are at risk of harm.
- Pupils are missing education.
- A complainant is being prevented from having their complaint progressed through the trust's complaints procedure.
- The DfE has evidence that the trust is proposing to act or is acting unlawfully or unreasonably
- If a social services authority decides to investigate a situation, the board of trustees may postpone the complaints procedure.

### **12. Complaints campaigns**

Where the School / Trust receives a large volume of complaints about the same topic or subject, especially if these come from complainants unconnected with the school, the School / Trust may respond to these complaints by:

- Publishing a single response
- Sending a template response to all the complainants

If complainants are not satisfied with the school's response, or wish to pursue the complaint further, the normal procedures will apply.

### **13. Roles and responsibilities**

The role of the Principal.

- The Principal will ensure that staff are familiar with this policy and receive appropriate training in complaint handling and ensure the smooth running of the procedure.
- The Principal may assign a member of the Senior Leadership team to deal with formal complaints.
- The Principal will ensure that the complainant is fully updated at each stage of the procedure.

The role of the Local Academy Governing Board;

- The LAGB will monitor complaints (nature and level) to review any improvements to current School processes or systems.

## The role of the other staff

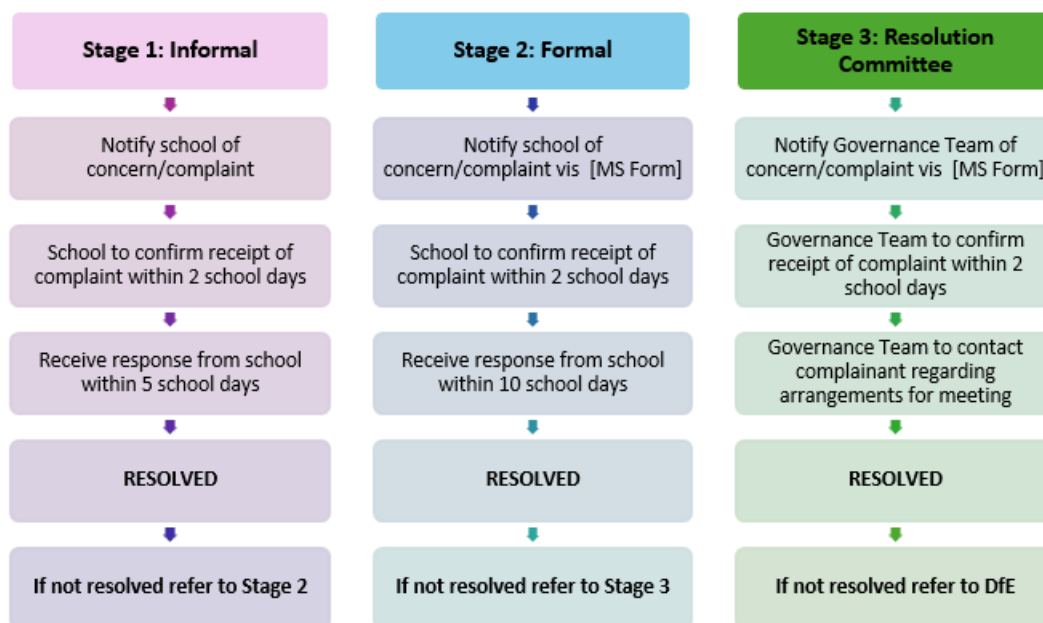
- All staff should deal with complaints, queries or concerns from parents in a professional manner and in line with the timescales of this policy.
- All staff will seek to resolve the complaint at the earliest possible stage.
- The Principal (or representative) appointed to investigate a complaint will provide a comprehensive, transparent and fair consideration of the complaint.
- The investigator (where applicable) will hold professional interviews, keep accurate records, and keep an open mind when analysing information and responding to the complainant.
- The School will keep a complaints log to record formal complaints.
- The Governance Professional will convene a Governor’s panel and communicate information to all parties at Stage 3 of the process.

## 14. Making a complaint

Any person, including a member of the public, will be able to make a complaint about the provision of facilities or services that the School/Trust provides. Complaints may also be made by a third party on behalf of a complainant, contingent on appropriate consent having been obtained to do so. All complaints made will be handled via the procedures outlined in this policy.

Any parent and/or carer of a pupil in a School will be able to make a complaint about the provision of facilities or services that the School provides. Any complaints made by other parties may be handled via different procedures to those outlined in this policy. This includes complaints made by a third party on behalf of a parent or carer of a pupil/student in a School. The School / Trust will not normally investigate anonymous complaints.

## Complaints Process



## 15. Stage one – informal complaint

An informal complaint may be made in person, by telephone, in writing or in person. It is in everyone’s interest to resolve complaints at the earliest possible ‘stage’. There are many occasions where concerns are resolved straightaway

through speaking to a member of staff. This will usually be the member of staff most closely associated with the issue, such as a class teacher or pastoral leader, unless the nature of the concern makes this inappropriate.

The staff member dealing with the concern makes sure that the complainant is clear what action (if any) or monitoring of the situation has been agreed, putting this in writing only if this seems the best way of making things clear.

The School will seek to ask the complainant at the earliest stage what they think might resolve the issue in order to find a satisfactory outcome for all parties.

The normal response time for an initial response or acknowledgement is within two school days. Where this is not possible, an explanation must be given for the reason for delay. On certain major issues, the Principal may decide to deal with concerns directly at this Stage.

If the concern is about the Principal, Executive Principal, CEO, Governors or Trustees the Trust will follow Stage 2 of this process and the Chair of the LAGB will be informed and investigate the complaint. All concerns/ complaints should be logged by completing this form [Stage 2 Complaint Form](#) .

Within 10 school days of notification of the complaint, the complainant and the relevant member of staff should discuss the issue in a respectful and informal manner to seek a mutual resolution. At this initial communication stage of the complaint, the complainant will be asked for their input as to what they believe may resolve the issue about which the complaint has been made to avoid further escalation where possible.

In line with DfE guidance, complainants should note that any acknowledgement by the School/ Trust that it could have handled the situation better is not an admission of unlawful or negligent action. If an appropriate resolution cannot be sought at this informal level, or if the complainant is dissatisfied with the outcome following the initial discussions, the person managing the response to the complaint will inform the complainant about the next level of the procedure.

## **16. Stage two – formal complaint**

Formal complaints must be made in writing by using this form [Stage 2 Complaint Form](#).

Stage two of the process will be completed within 10 school days. Where the situation is recognised as complex, and it is deemed to be unable to be resolved within this timescale, the person managing the complaint will contact the complainant to inform them of the revised target date via a written notification. An appointment with the appropriate person for managing the complaint should be made, as soon as reasonably practical, to avoid any possible worsening of the situation.

The School/ Trust reserves the right to determine that the Investigator at each formal stage of the process is independent and appropriate for that stage of investigation e.g. Executive Principal, School Leader, Senior Leader, Chair of the Governors, Trustee or member of the Trust Central Team and an Investigator may be appointed from a different School from the Trust should this be deemed appropriate in the circumstances of the complaint.

Any member of staff who is complained about will have the opportunity to respond to the complaint during the investigation and will be able to see any response sent as a result of the investigation. If, however, during considering a complaint, the Investigator concludes that disciplinary procedures should be initiated, they will consider this as a separate action, as there is an entirely separate procedure to follow in terms of dealing with staff disciplinary matters. Complainants will be informed that the issue is being dealt with separately and outside of the Complaints Policy, but any further information will remain confidential.

The complainant will be advised of any escalation options (e.g. escalation to stage three) and will be provided with details of this process. Any further action the School/ Trust plans to take to resolve the issue will be explained to the

complainant in writing. If the complainant is not satisfied with the outcome suggested, the procedure will progress to stage three. A request to escalate to stage three will be made to the Governance Team by completing this form [Stage 3 Complaint Form](#) within 10 school days of the end of stage two, i.e. communication of an outcome.

### **17. Stage three – panel hearing**

If the complainant indicates in writing that they wish to appeal against the outcome of the investigation into their complaint, this is referred to an appeal panel. It is important that this review is unprejudiced and impartial; therefore, no Governor/ Trustee may sit on the Panel if they have had prior involvement with the complaint. The review is the last stage of the internal complaints process and is not there to merely rubber stamp previous decisions.

Many complaints are inevitably seen by parents as being ‘against’ a particular member of staff and their actions. However, all complaints that reach this stage will have done so because the complainant has not been satisfied at the earlier stages of the procedure. At this stage, the complaint will be considered as a complaint about the School or Trust, rather than an individual member of staff.

Where the complaint progresses to stage three, a panel will be constituted to hear the complaint, consisting of at least three individuals who were not directly involved in the matters detailed in the complaint, and at least one panel member must be independent of the management and running of the school. In line with the DfE’s guidance for academies on setting up a complaints procedure, a governor from a local governing body at a different school within the MAT, who has no conflict of interest or prior knowledge of the complaint, can be used as the independent panel member. This is because such a person has no direct involvement with the management and running of the school being complained about.

If the complainant believes there is likely to be bias, they may request an independent panel. The Trust will consider such requests and will not unreasonably withhold consent.

The panel’s role is to consider whether the complaint has been handled fairly, proportionately and in line with policy, rather than to reinvestigate matters in full.

The Governance Professional will record the date the escalation request was received, acknowledge receipt of the complaint, and inform the complainant of the scheduled time and date of the panel hearing in writing. The meeting will be convened within 20 school days of the receipt of the escalation request where possible.

Where this is not possible, the Governance Professional will provide an anticipated date and ensure the complainant is kept up-to-date. 5 school days’ notice will be given to all parties attending the panel hearing, including the complainant.

Prior to the hearing, the Governance Professional will have written to the complainant informing them of how the review will be conducted. The Principal and the Chair of the LAGB will also have a copy of this letter.

At the hearing, all participants will be given the opportunity put their case across and discuss any issues. The meeting will allow for:

- The complainant to be present and accompanied at the hearing if they wish.
- The complainant to explain their complaint and the individual handling the complaint to explain the reasons for their decision.
- The complainant to question the individual handling the complaint, and vice versa, about the complaint.
- Any evidence, including witnesses who have been prior approved by the chair of the panel, to be questioned.
- Members of the panel to question both the complainant and the individual about whom the complaint was made.
- Final statements to be made by both parties involved.

Complainants are encouraged to attend the panel hearing and may be accompanied by a relative, friend, or supporter. In line with DfE guidance for academies on setting up a complaints procedure, we recommend that neither the complainant nor the school bring legal representation. A stage 3 complaints panel hearing is not a form of legal proceedings.

- Representatives from the media are not permitted to attend.
- With agreement from all parties, the meeting may take place via an electronic platform such as MS Teams.
- The meeting will be held in private and will be confidential.
- Electronic recordings are not normally permitted, unless required as part of reasonable adjustments for disability or medical needs. Prior consent of all parties must be obtained and recorded in the minutes.

A member of staff who may be a witness to the complaint can bring a union representative or legal representative if desired; this will be agreed before the hearing. The purpose of the hearing will be reconciliation and ensuring that things that may have gone wrong are corrected.

Following the hearing, the Panel may dismiss the complaint, uphold it in whole or in part, and/or make recommendations for remedial action or service improvement. The Panel's role is not to apportion individual blame but to consider whether the complaint has been handled fairly and appropriately, and whether any learning or improvement is required.

The complainant will receive a written response explaining the panel's findings and recommendations within 15 school days. This letter will also explain whether there are any further rights of appeal and to whom they need to be addressed. The panel will make findings and recommendations, and a copy of those findings and recommendations will be made available for inspection by the LAGB, Board of Trustees and the Principal. Where relevant, the person complained about will receive a summary of the panel's findings and recommendations. They will also receive a copy of the minutes, subject to any necessary redactions under the Data Protection Act 2018 and the UK GDPR. Any recommended actions will be considered by the School/ Trust and implemented where appropriate.

Where the appropriate person has made reasonable attempts to accommodate the complainant with dates for a complaint meeting and they refuse or are unable to attend, the meeting will be convened in their absence and a conclusion will be reached in the interests of drawing the complaint to a close.

## **18. Referral to the Department for Education (DfE)**

Stage three concludes the Trust's internal complaints procedure. If a complainant remains dissatisfied after completing all stages, they may refer their complaint to the Department for Education.

Complainants should note that the DfE does not investigate the substance of complaints or overturn decisions. Its role is to consider whether the Trust has followed its published procedure correctly and complied with relevant legal and contractual obligations.

## **19. Monitoring and Review**

The Trust will maintain a central record of complaints across its school's. Anonymised data on the number, nature and outcomes of complaints will be reviewed regularly by the Executive Team.

The Trust Board will receive periodic reports on complaints trends, learning points and any resulting actions taken to improve practice, systems or policies across the Trust.

Complaints will be used as a source of organisational learning and continuous improvement, alongside other quality assurance and governance processes. This policy will be reviewed every two years or if there has been any changes to legislation.