
AI-generated complaints: what they're really telling you

Confederation of School Trusts

Victoria Hatton, Partner & Claire Archibald, Legal Director
15 October 2026

**Browne
Jacobson**

brownejacobson.com
linkedin.com/company/brownej

“AI-generated complaints are unreasonable”

Let's play a game

“No, but...”

“Yes, and...”



What AI-generated complaints are really telling you (it's not about the technology)

School Leaders Survey findings

Summer 2026

**Browne
Jacobson**

Key findings

Complaints and the impact of AI

90%

Say parents are escalating complaints more quickly than two years ago — many immediately, with no attempt at informal resolution whatsoever.

46%

Say complaint volumes are approaching or have already reached breaking point.

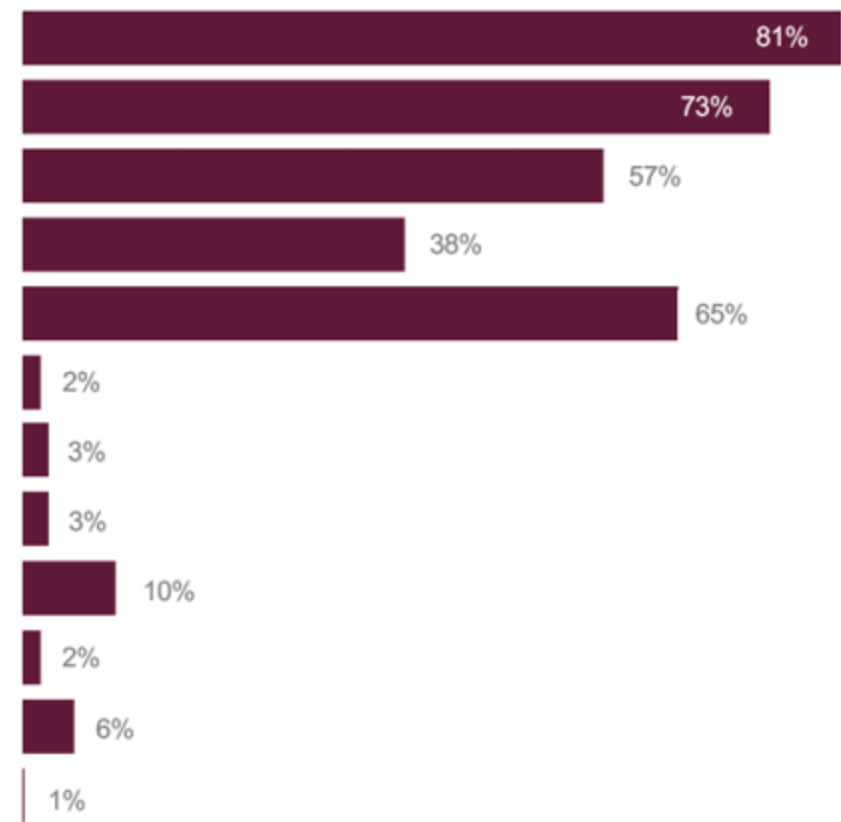
90%

Have observed an increase in complaints that appear to be AI-generated or AI-enhanced.

School Leaders Survey: Complaints and the impact of AI

What school leaders nationally told us:	
Impact	% of leaders reporting this
Increased length and complexity of complaints	81%
More formal/legalistic tone requiring additional time to respond	73%
Parents including AI-generated content they don't fully understand or can't explain	65%
Parents less likely to want to meet or resolve complaints informally	57%
Greater volume of complaints overall	38%
Better structured and organised presentation of concerns	10%
Complaints more likely to follow established procedures correctly	3%
Reduced use of aggressive or emotional language	3%
Improved clarity of concerns raised	2%
No noticeable impact	2%
N/A — not experienced AI-generated complaints	6%

Browne Jacobson School Leaders Survey, Summer 2026



When a parent reaches for AI, something has gone wrong

What are they telling you?

They feel unheard

It is unlikely that this has come from nowhere- was there a conversation that went nowhere, or a promise that was not kept?

They do not trust you

The parent does not believe that the school will engage with them in good faith

They want to be armed

AI gives parents access to legal scaffolding

Case study - Frank

- Frank's mother believes he has ASD; the school does not share that view.
- The school has introduced a water-only policy without consulting parents.
- His mother emails the class teacher raising dehydration concerns and requesting extensive information about how and when the decision was made.



Case study - Frank

"I write to formally notify the school of my intention to invoke the statutory complaints procedure. This matter engages, amongst other provisions, the Equality Act 2010, Article 28 of the UN Convention on the Rights of the Child, and the school's duties under the Children Act 1989. I require a full written response addressing each ground within 10 working days."

*Strip away the AI scaffolding:
what is this parent actually worried about?*



Task

Exercise: use your highlighters

- Yellow: What is the actual complaint?
- Green: What is a data/information request?
- Pink: What is background context?
- No colour: What is not relevant?

What the complaint looks like now

From: Sarah Blackwood
To: J.Perkins, Yr 3 Teacher
Date: 6 October 2026, 23.14
Subject: Formal Concerns Re Francis Blackwood Yr 3 — Healthy Eating Policy / Reasonable Adjustments / Information Request / Urgent Response Required

Dear Ms Perkins

I am writing to formally place on record my profound and escalating concerns regarding the school's recently introduced healthy eating and hydration policy and its impact upon my son, Frank, whose welfare, educational entitlements, and legal rights I believe are being materially compromised by the school's failure to give adequate consideration to the needs of children in his position. **I have raised concerns about Frank on previous occasions — including a formal complaint last year about a lunchtime incident, and more recently in connection with a fixed-term suspension** he received last month. I set out my current concerns in full below and place the school on formal notice of my intention to pursue all available remedies should a satisfactory response not be forthcoming.

The Policy And Its Impact On Frank

The school's decision to introduce a blanket policy permitting children to consume only plain water during the school day is, in my view, one that has been implemented without meaningful consultation with parents, without adequate notice, and — most critically — without any apparent consideration of the impact upon children with additional needs, disabilities, or protected characteristics. Frank has sensory processing difficulties. This is not a matter of preference or fussiness on his part or mine. His difficulties have been communicated to the school by me in writing on multiple occasions. Frank has a significant sensory aversion to plain water. The introduction of a policy which makes plain water the only permitted drink, applied uniformly and without exception, directly and adversely affects his ability to remain hydrated throughout the school day, with consequent implications for his concentration, his wellbeing, and his ability to access his education on an equal footing with his peers.

Legal Framework And Obligations

The school's failure to make any reasonable adjustment to this policy in respect of Frank is, in my view, not merely an administrative oversight. I am advised that the public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the school to have had due regard to the impact of this kind of policy upon children with protected characteristics before it was introduced. I am further advised that the school's obligations under the Children Act 1989 and the rights afforded to children under Articles 3 and 24 of the United Nations Convention on the Rights of the Child, to which the United Kingdom remains a signatory, are engaged by a policy of this kind when it is applied without adjustment to a child whose needs are known to the school. I have been **unable to locate any published equalities impact assessment relating to this policy on the school's website or in any communication I have received**, and I am advised that the absence of such an assessment in circumstances where the policy has a differential impact on children with protected characteristics may itself constitute a procedural failure of legal significance. I would also note that **the policy appears to have been adopted by the governing body without any prior parental consultation, and I would like to understand the process by which that decision was made and the date on which it was formally approved.**

Statutory Requests And Formal Notifications

Given the above, and given the **school's broader handling of matters relating to Frank**, over the past year, I consider it necessary to request access to certain information and documentation. Pursuant to Article 15 of the United Kingdom General Data Protection Regulation as retained in domestic law by the European Union (Withdrawal) Act 2018, and section 45 of the Data Protection Act 2018, I hereby **submit a request for the entirety of the personal data held by the school in respect of Frank**, including without limitation all correspondence, electronic communications, attendance records, behavioural records, exclusion records, safeguarding records, SEND documentation, meeting notes, file entries, referrals, assessments, and reports held in any format, together with all metadata, from the date of Frank's admission to the school to and including the date of this email. I require the response to be provided electronically to this email address and I do not consent to any extension of the statutory

response period. I further request, pursuant to the Freedom of Information Act 2000, disclosure of the following: a copy of the school's **current healthy eating and hydration policy together with the date on which it was formally adopted by the governing body**, a copy of any equalities impact assessment conducted prior to or following the implementation of the current policy, the total number of formal parental complaints received by the school in each of the last three complete academic years, **disaggregated by stage reached**, and the full name and contact details of the governor holding specific responsibility for safeguarding, special educational needs and disabilities, and exclusions. I understand the school is required to respond to this request within twenty working days.

Actions Required And Position Reserved

I require, within five working days of receipt of this email, written acknowledgement confirming that this correspondence has been received in its entirety and escalated to the headteacher and chair of governors; written confirmation of the interim reasonable adjustments the school intends to make for Frank in respect of the hydration policy, pending formal resolution of this matter; **and the name and contact details of the governor responsible for SEND oversight**. Should the school fail to respond in a manner that is timely, substantive, and satisfactory, I am both entitled and prepared to refer these matters to the Local Authority, to His Majesty's Chief Inspector at Ofsted, and to the Secretary of State for Education. **I have sought guidance from a local SENDIASS adviser and from a parents' rights organisation** and I reserve all rights.

I want to be clear that what I want, above all else, is for Frank to be able to get through his school day safely, comfortably, and properly hydrated. That should not be a controversial aspiration. I require the school to provide written responses to each of the following questions, individually and in full, within five working days:

1. On what date was the healthy eating and hydration policy formally adopted by the governing body, and who approved it?
2. Was any consultation with parents carried out prior to the introduction of the policy, and if so, what form did that consultation take and when did it occur?
3. Was an equalities impact assessment carried out before the policy was implemented, and if so, why has it not been published or made available to parents?
4. **What specific consideration was given to the needs of children with sensory processing difficulties, dietary requirements**, or other protected characteristics before the policy was introduced?
5. **What reasonable adjustments**, if any, has the school made or does it intend to make for Frank in respect of this policy, and within what timeframe?
6. **Who within the school has responsibility for ensuring that Frank's documented sensory and dietary needs are reflected in day-to-day decisions of this kind**, and what is that person's role?
7. **Has the school sought any external guidance** — from the Local Authority, from a SEND adviser, or otherwise — in relation to the policy's compliance with the Equality Act 2010?
8. What is the name and contact email address of the governor with oversight responsibility for SEND, inclusion, and exclusions?
9. **When does the school intend to review this policy**, and will parents of children with additional needs be consulted as part of that review?
10. What is the school's formal complaints procedure, and at what stage does this correspondence sit within that procedure?

Yours sincerely

Sarah Blackwood
Mother of Frank

Change management

Why the complaint was always going to happen

What the school did	What Frank's mother heard
Introduced a water-only healthy eating policy without consulting parents before implementation	<i>"They have decided. I had no say. They don't care what we think."</i>
Did not provide the evidence base	<i>"This is arbitrary - they have no basis for it."</i>
Applied the policy consistently to all children and did not address SEND or sensory needs in the policy communication	<i>"My child and his needs have been forgotten."</i>

The three-pillar framework



The diagram illustrates the 'three-pillar framework' with three distinct circles arranged horizontally. The first circle on the left is dark purple and contains the word 'Prevention'. The middle circle is teal and contains the word 'Protection'. The third circle on the right is red and contains the word 'Process'. All three circles are of equal size and are separated by equal gaps.

Prevention

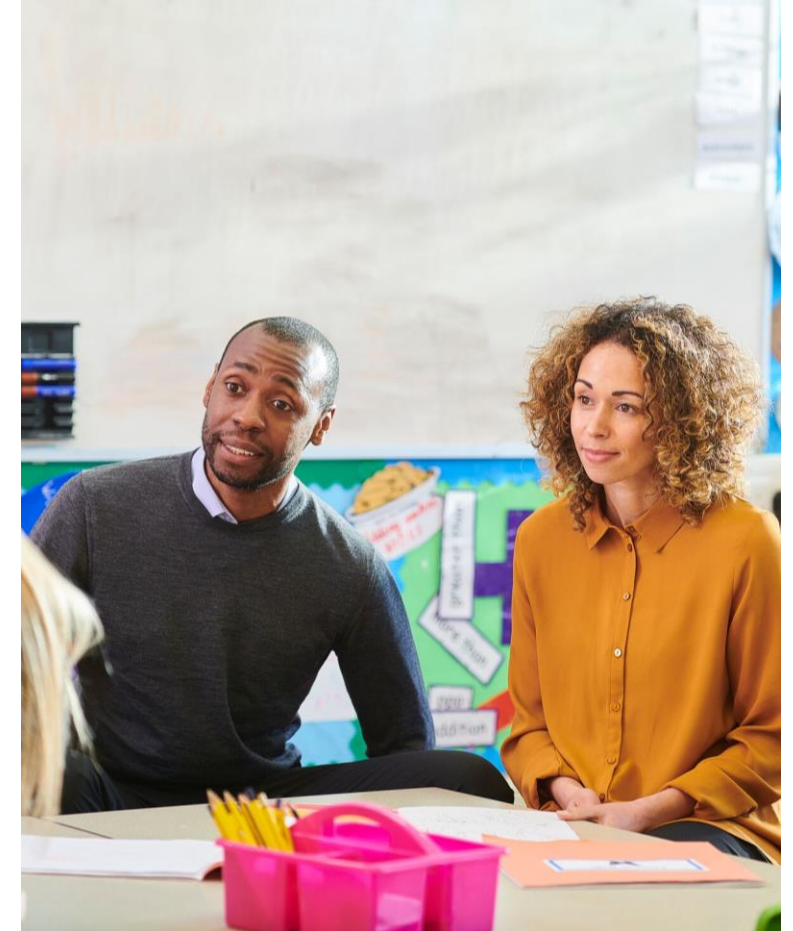
Protection

Process

Prevention: a counter-intuitive approach

Helping parents complain effectively

- Helping parents complain effectively means fewer formal complaints, not more
- Most complaints escalate not because the underlying issue is serious- but because the initial concern was poorly articulated or badly handled
- The schools that thrive aren't those with the fewest complaints. They are those where concerns are raised early, handled well and resolved quickly



Protection: building AI literacy

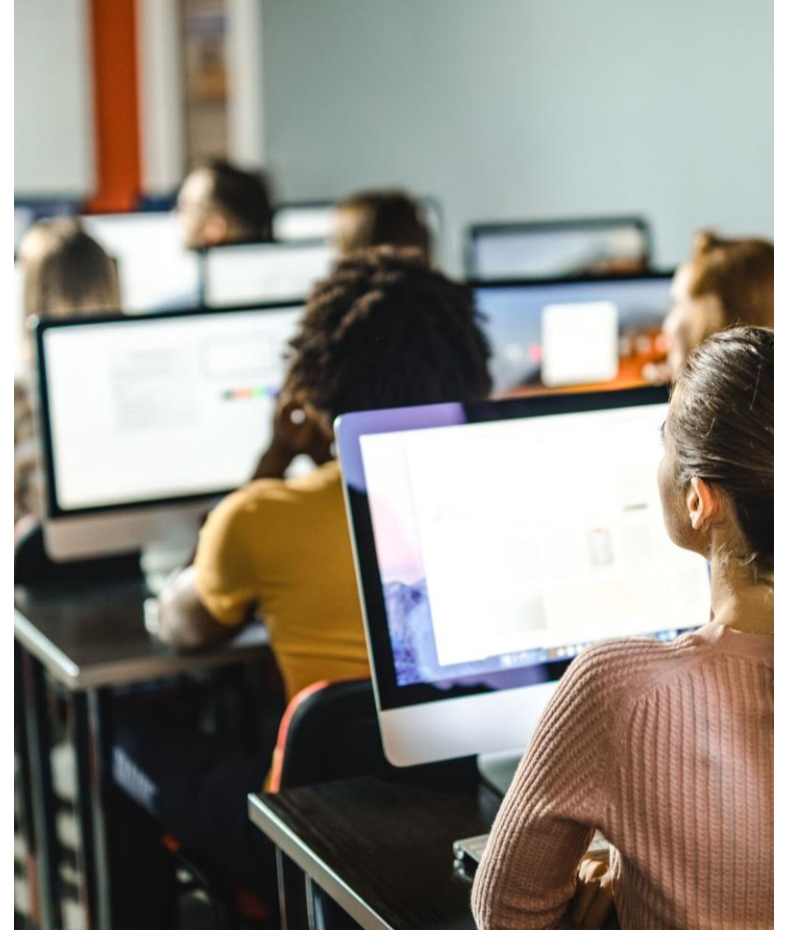
For both staff and parents

For staff:

- Show staff that AI doesn't automatically mean unreasonable
- Coach them through the noise
- Respond, don't react
- Use AI to summarise upsetting correspondence

For parents:

- Authoritative-looking text is not accurate text
- Include AI literacy guidance in policy and parent induction
- SARs/FOIs- entitled to make a request, not dictate search terms



Building AI literacy

Your complaints procedure

Extract from model complaints procedure

“If you choose to use artificial intelligence (AI) tools (such as ChatGPT, Microsoft Copilot, Google Gemini or similar) to help you draft or structure your concern or complaint, please read the guidance set out in Annex 2 of this procedure before doing so”.

Annex 2 - Guidance on using AI tools to raise concerns or complaints

“AI tools can help you organise your thoughts, structure your concern or complaint clearly, and express yourself effectively. However, these tools have significant limitations and must be used with care. This Annex provides practical guidance on how to use AI tools effectively when raising a concern or complaint under this procedure, and what to avoid. If you are unsure about how to use AI tools when raising a concern or complaint, or if you would like help preparing your concern or complaint, please contact the [school office] and we will arrange for a member of staff to assist you”.

Avoiding AI becoming a barrier to informal resolution

"Thank you for taking the time to set out your concerns in such detail. It is clear that you are very worried about Frank, and we want to make sure we properly understand everything that matters to you. A written exchange can sometimes make it harder - rather than easier - to get to the heart of things, and we think a conversation would serve Frank's interests much better at this stage. Would you be willing to meet with us, or speak by telephone, so that we can listen to your concerns directly and talk through how we can help?"

What if the parent refuses to meet?

What you should do

- Identify the core concerns and respond to those.
- Set out clearly what the school has done, is doing, or will do.
- State what falls outside the scope of the complaints procedure.
- Invite dialogue again — but once, not repeatedly.

What you are not required to do

- Respond to every AI-generated demand as if it were a valid legal obligation.
- Produce documents, statements or records on demand outside of a formal SAR or FOI process.
- Engage in open-ended written correspondence indefinitely.

Process: The art of scoping

Separating out the strands

The full scenario

The background, the people, the pupil, the history and any parental conduct issues that exist separately from the correspondence itself.

The correspondence

Not everything in the email/letter will be a complaint.

Separate out the different strands and make sure each is directed to the right process.

The complaint

Defining the precise complaint issues to be investigated and the outcomes being sought.

Adopting the right mindset

Resolution mindset vs process mindset

	Resolution Mindset	Process Mindset
Focus	Restoring the relationship; addressing the underlying issue.	Following procedure; protecting the school's legal position.
Tone	Open, empathetic, problem-solving.	Formal, boundaried, evidence-based.
Goal	Close the complaint; meet the need.	Manage the risk; conclude the process lawfully.
When to use	Genuine dissatisfaction; resolvable concern.	Unreasonable conduct; legal escalation; bad faith.

03

Actions to take now

Actions to take now

Action

The questions to ask

Review your complaints procedure

Does it address AI and include guidance for parents?

Think before your next significant decision

Invest in the upstream relationship before the complaint arrives: what will parents hear?

Scope your next complex complaint

Identify and separate the complaint, information requests and background context

Train your frontline staff

Are your staff empowered to deal with AI-generated correspondence?

Think about your mirror

Does the communication style you model get reflected back at you?

On demand free webinars

Complaints

For more information:



A fresh start: Rethinking how schools handle parental complaints

17 September 2026

Share



Handling parent complaints against staff: Panel discussion

13 February 2025

Print Share



School complaints: handling problem parent behaviour

23 May 2024

Print Share



Best practice complaints management for schools and academy trusts

23 May 2023 Victoria Hatton

Print Share

Questions

Talk to us



Victoria Hatton
Partner

+44 (0)330 045 2828
victoria.hatton@brownejacobson.com



Claire Archibald
Legal Director

+44 (0)330 045 1165
claire.archibald@brownejacobson.com

Please note

The information contained in these notes is based on the position at October 2026. It does, of course, only represent a summary of the subject matter covered and is not intended to be a substitute for detailed advice. If you would like to discuss any of the matters covered in further detail, our team would be happy to do so.

© Browne Jacobson LLP 2026. Browne Jacobson LLP is a limited liability partnership

Thank you

brownejacobson.com

+44 (0)370 270 6000

**Browne
Jacobson**

To view our office locations visit [brownejacobson.com/contact-us](https://www.brownejacobson.com/contact-us)

Browne Jacobson is the brand name under which Browne Jacobson LLP and Browne Jacobson Ireland LLP provide legal and other services to clients. The use of the name “Browne Jacobson” and words or phrases such as “firm” is for convenience only and does not imply that such entities are in partnership together or accept responsibility for acts or omissions of each other. Legal responsibility for the provision of services to clients is defined in engagement terms entered into between clients and the relevant Browne Jacobson entity. Unless the explicit agreement of both Browne Jacobson LLP and Browne Jacobson Ireland LLP has been obtained, neither Browne Jacobson entity is responsible for the acts or omissions of, nor has any authority to obligate or otherwise bind, the other entity.