

ZEN COMBAT ACADEMY LTD

COMPLAINTS & DISCIPLINARY POLICY & PROCEDURES

Fair, transparent and proportionate arrangements for raising concerns, investigating conduct, making decisions and appeals

Organisation	Zen Combat Academy Ltd
Policy title	Complaints & Disciplinary Policy and Procedures
Version	1.0
Issue date	25 September 2026
Review date	September 2027 or sooner if required
Complaint contact	support@zencombatacademy.co.uk
Applies to	Students, parents/carers, coaches, instructors, employees, volunteers, contractors, spectators, visitors and other persons connected with Academy activity
Policy basis	Fair procedure, safeguarding duties, Equality Act 2010, data protection law and - for employment matters - the current Acas Code of Practice

This is a Zen Combat Academy Ltd policy. It should be read alongside the Academy safeguarding, equality and inclusion, whistleblowing, safe practice, social media and codes of conduct.

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Important distinction

A complaint is not automatically a disciplinary charge. Zen Combat Academy Ltd will first establish the appropriate route, gather relevant information and decide whether there is a case to answer. Safeguarding and criminal matters may require immediate referral to statutory agencies and may take priority over internal proceedings.

1. Purpose, aims and scope

Zen Combat Academy Ltd is committed to dealing with complaints and alleged misconduct fairly, consistently, promptly and proportionately. The purpose of this policy is to provide a clear route for concerns to be raised and, where necessary, for conduct to be investigated and considered through a disciplinary process.

The policy aims to:

- provide an accessible and transparent process for raising concerns;
- encourage early and informal resolution where appropriate and safe;
- protect the welfare and dignity of children, adults at risk and all participants;
- ensure that respondents understand the concern or allegation and have a fair opportunity to respond;
- separate investigation, decision-making and appeal functions where reasonably practicable;
- manage conflicts of interest and use independent people where necessary;
- apply proportionate outcomes and maintain appropriate records.

This policy applies to conduct connected with Zen Combat Academy Ltd activities, premises, classes, one-to-one sessions, competitions, fight-team activities, gradings, events, trips, online spaces, social media, volunteering, employment and representation of the Academy.

It may apply to directors, employees, coaches, instructors, assistant instructors, volunteers, students, parents/carers, contractors, spectators and visitors. Where a matter concerns an employee, Zen will also follow any applicable employment contract and the current Acas Code of Practice on disciplinary and grievance procedures. The Academy will review this policy if a replacement Acas Code comes into force.

2. Principles and definitions

Zen Combat Academy Ltd will apply the following principles:

- fairness - no disciplinary finding will be made without a reasonable opportunity for the respondent to understand and answer the allegation;
- impartiality - anyone with a material conflict of interest must not investigate or decide the matter;
- proportionality - the response should reflect the seriousness, risk, evidence, history and circumstances of the case;
- confidentiality - information will be shared only where there is a legitimate need to know or a legal/safeguarding reason;
- accessibility - reasonable adjustments and communication support will be considered for disabled people and others who need them;
- child-centred and safeguarding-aware practice - the welfare of children and adults at risk will not be compromised by an internal complaints process;
- no retaliation - no person should be disadvantaged for making, supporting or participating in a complaint in good faith.

Term	Meaning
Complainant	The person raising the complaint, or a person authorised to raise it on another person's behalf.
Respondent	The person whose conduct is the subject of the complaint or disciplinary allegation.
Case Manager	The person appointed by Zen to coordinate the process and communications.
Investigating Officer	A person appointed to gather facts and prepare an impartial investigation report.
Disciplinary Panel	The person or panel appointed to decide whether an allegation is proved and, if so, the appropriate outcome.
Appeal Panel	A person or panel not previously involved in the decision being appealed, appointed to review the appeal.

3. Which procedure should be used?

The Academy will first decide which route is appropriate. A concern may involve more than one route.

Type of concern	Primary route
Immediate risk, abuse or safeguarding concern	Safeguarding Children or Safeguarding Adults procedures. Emergency services, children's social care, adult social care or the police may be contacted where required.
Suspected crime	Police or other appropriate authority. Internal action may be paused or coordinated with the external investigation.
Employee grievance about work	Employment grievance procedure / Acas-aligned process where applicable.
Whistleblowing / public-interest wrongdoing	Whistleblowing Policy and Procedures.
Equality, discrimination, bullying or harassment	This policy together with the Equality, Diversity & Inclusion Policy and safeguarding procedures where relevant.
Customer/service dissatisfaction	Complaints route under this policy; informal resolution may be attempted first.
Misconduct or breach of Academy rules	Investigation and, if there is a case to answer, disciplinary procedure under this policy.

Safeguarding takes priority

A complaint must never be treated as merely a customer-service matter where the information suggests that a child or adult at risk may have suffered or be at risk of harm. Zen will follow its safeguarding procedures and current statutory guidance.

4. Making a complaint

Where appropriate, a person may first raise a minor concern informally with the relevant instructor or manager. Informal resolution is not required where the matter is serious, involves safeguarding, discrimination, harassment, violence, intimidation, a conflict of interest, or where the complainant does not feel safe doing so.

A formal complaint should normally be made in writing to support@zencombatacademy.co.uk as soon as reasonably practicable and preferably within 28 calendar days of the incident or of the complainant becoming aware of it. Zen may accept a later complaint where there is a reasonable explanation, safeguarding issue, continuing pattern of conduct or other good reason.

A complaint should include, where possible:

- the complainant's name and contact details;
- the name of the person or persons complained about;
- what happened, including dates, times and locations;
- the names of any witnesses;
- relevant messages, documents, photographs or other evidence;
- whether the matter has been raised elsewhere;
- what outcome the complainant is seeking;
- any accessibility, communication, safeguarding or confidentiality needs.

A parent/carer, advocate or representative may assist a complainant. For children, Zen will involve the child in an age-appropriate way and will normally involve the parent/carer unless doing so could increase risk or conflict with safeguarding advice.

If the complaint concerns the person who would normally manage the complaint, it must be referred to another director, senior person or an independent external person with no material conflict of interest.

5. Initial assessment and triage

Zen will normally acknowledge a formal complaint within 5 working days. The Case Manager will then make an initial assessment, usually within 10 working days, to decide:

- whether the matter falls within this policy;
- whether safeguarding, police, LADO, social care, DBS or another external referral must be considered;
- whether immediate protective or interim measures are required;
- whether the complaint can be resolved informally or through facilitated discussion/mediation;
- whether a formal investigation is required;
- who should investigate and who should later decide the case, taking account of conflicts of interest.

A decision not to investigate will be explained in writing. The complainant may ask for that decision to be reviewed within 10 working days where they believe relevant information was overlooked, the wrong procedure was used or the decision was unreasonable.

6. Investigation process

Where a formal investigation is required, Zen will appoint an Investigating Officer who is sufficiently independent of the events and people involved. For complex, serious or safeguarding-related matters, Zen may appoint a suitably experienced external investigator or adviser.

The investigation should be proportionate to the allegation and may include:

- reviewing the complaint, policies, codes of conduct, attendance records, communications, video or other relevant records;
- interviewing the complainant, respondent and relevant witnesses;
- giving the respondent a clear description of the allegations and a reasonable opportunity to provide evidence and identify witnesses;
- considering relevant mitigating and aggravating circumstances without deciding the outcome in advance;
- maintaining a clear evidence and decision log.

The investigator is a fact finder and should not normally decide the sanction. Investigation meetings are not disciplinary hearings.

Zen aims to conclude a routine investigation within 30 working days. More complex matters may take longer. The complainant and respondent should normally receive an update at least every 20 working days where the matter remains open. Delays caused by police, safeguarding agencies, witness availability or complexity will be recorded and explained as far as confidentiality permits.

At the conclusion of the investigation, the Investigating Officer will prepare a written report setting out the allegation, evidence considered, areas of agreement and dispute, relevant policies and whether there appears to be a case to answer. The report does not itself determine guilt or sanction.

7. Interim safeguarding and risk measures

Zen may impose temporary measures before a final decision where reasonably necessary to protect people, preserve evidence, manage safeguarding risk or protect the integrity of the process. Interim action is neutral and is not a disciplinary finding.

- temporary suspension from coaching, instructing, volunteering, training, fight-team activity, events or access to premises;
- temporary changes to duties, supervision, class allocation, communication routes or contact with named persons;
- requiring another responsible adult to be present;
- temporary removal from online groups or Academy social-media administration;
- other proportionate restrictions based on a documented risk assessment.

Interim measures will be reviewed regularly and at least every 30 days. Where an employee is suspended from work, Zen will follow applicable employment law, contract terms and Acas guidance, including considering alternatives to suspension where appropriate.

8. Case review and disciplinary charges

After receiving the investigation report, a Case Reviewer or Case Management Group with no material conflict of interest will decide whether:

- no further action is required;
- informal action, education, mediation or management guidance is appropriate;
- there is a case to answer and a formal disciplinary charge should be issued;
- the matter should be referred or re-referred to an external authority.

Where a formal charge is issued, the respondent will receive written notice identifying the alleged conduct, the relevant rule/policy where applicable, a summary of the supporting evidence, the possible range of outcomes and the next procedural step. The wording should be specific enough to allow a meaningful response.

9. Disciplinary hearing

A formal disciplinary hearing will be held where serious misconduct is alleged, facts remain disputed, suspension or exclusion is being considered, or the Case Reviewer otherwise considers a hearing necessary for fairness.

The respondent will normally receive at least 10 working days' notice of the hearing and the evidence to be relied upon. The respondent should normally provide any documents or witness details they wish to rely upon at least 5 working days before the hearing, unless the Chair agrees otherwise.

The hearing may take place in person or by secure video conference. The decision-maker(s) must be independent of the investigation to the extent reasonably practicable. Serious cases should normally be heard by a panel of up to three people, with external independence considered where the allegation concerns a director, senior instructor or safeguarding role.

The procedure will normally include:

1. The Chair explains the allegation, procedure and possible outcomes.
2. The investigation findings and supporting evidence are presented.
3. The respondent is given a full opportunity to respond, present relevant evidence and identify mitigation.
4. Relevant witnesses may be asked questions in a respectful and proportionate way. Cross-examination is not automatic and may be controlled to protect children, adults at risk or witnesses from intimidation.
5. The panel asks any further questions required to understand the evidence.
6. The respondent is given a final opportunity to summarise their position.
7. The panel deliberates in private and applies the balance of probabilities when deciding disputed facts.

A person may be accompanied or supported at a hearing by a parent/carer, appropriate adult, colleague, friend, advocate or representative where reasonable. Employees have any statutory or contractual right to be accompanied that applies to them. Legal representation is not automatic, but may be permitted in exceptional or particularly serious cases where fairness requires it.

If a person does not attend without good reason, the hearing may proceed in their absence if they were given reasonable notice and a fair opportunity to participate. Reasonable efforts should first be made to understand any disability, communication or safeguarding reason for non-attendance.

10. Outcomes and sanctions

The outcome will be based on the evidence, seriousness of the conduct, risk, impact, previous relevant history, mitigation, insight, safeguarding considerations and consistency with similar cases. Any sanction should be lawful, proportionate and capable of being explained.

- no case to answer / allegation not proved;
- informal advice, coaching conversation or agreed improvement action;
- verbal warning recorded for a defined period;
- first or final written warning;
- required training, supervision, mentoring, reflection or demonstration of competence;
- conditions or restrictions on coaching, sparring, one-to-one work, competition, travel, social media or other Academy activity;
- temporary suspension from specified Academy activities, premises, roles, classes, fight-team activities or events;
- removal from a voluntary or representative role;
- termination of membership / permanent exclusion from Academy activities where justified;
- employment action, including dismissal, only through an appropriate employment process where the person is an employee;
- referral to safeguarding authorities, police, DBS, LADO, social care, professional bodies, insurers or other relevant organisations where legally justified or required.

No automatic fines

This policy does not create a general power to impose punitive financial fines on students, parents, volunteers or staff. Zen may seek payment or recovery only where there is a clear contractual or legal basis, for example an unpaid fee or proven damage, and this will be kept separate from the disciplinary finding.

The written outcome will normally state the allegation, the finding, key reasons, any sanction or action plan, the duration of any warning/restriction, review arrangements and the right of appeal. It should normally be issued within 10 working days of the hearing or decision, unless there is a recorded reason for delay.

11. Appeals

A respondent may appeal a formal disciplinary finding or sanction. A complainant may request review of a decision to take no further action where they believe the procedure was materially flawed, significant evidence was overlooked or the decision was unreasonable. An appeal is not normally a complete re-hearing.

An appeal must normally be submitted in writing within 10 working days of the written decision. The appeal should identify one or more grounds:

- a significant procedural error or unfairness;
- new evidence that could not reasonably have been provided earlier;
- a material error in the findings of fact;
- a sanction that is clearly disproportionate to the finding;
- a material conflict of interest that affected the decision.

The Appeal Panel or Appeal Officer must not have made the original disciplinary decision. Where reasonably practicable, an appeal in a serious case will include an independent person. The appeal may confirm the decision, overturn it, vary the sanction, remove or vary conditions, or direct that the matter be reheard by a new panel.

The appeal outcome will normally be issued in writing within 10 working days of the appeal meeting or review. There is no appeal fee. The internal appeal decision is final under this policy, but it does not remove any statutory, safeguarding, employment or legal rights available outside the Academy.

12. Persistent, unreasonable or vexatious complaints

Zen will not label a complaint vexatious merely because it is repeated, strongly expressed, inconvenient or ultimately not upheld. Safeguarding concerns, discrimination complaints and good-faith challenges must be considered on their substance.

After a complaint has been fairly considered and all reasonable review routes exhausted, Zen may manage contact where a person repeatedly:

- raises substantially the same issues without significant new evidence;
- refuses to accept a final outcome while demanding repeated reconsideration outside the appeal process;
- uses abusive, threatening, discriminatory or harassing communications;
- makes excessive contact that substantially disrupts Academy operations without a reasonable safeguarding or access need;
- makes allegations known to be false with the primary purpose of causing harm or disruption.

Possible management steps include nominating one contact person, limiting communication to a reasonable frequency or method, declining to re-open an exhausted issue without new evidence, or taking conduct action where behaviour itself breaches Academy rules. Any restriction will be documented, proportionate, time-limited where appropriate and subject to reasonable adjustments.

13. Confidentiality, data protection and records

Complaint and disciplinary records may contain sensitive personal information. Zen Combat Academy Ltd will handle information in accordance with applicable UK data protection law, including the UK GDPR and Data Protection Act 2018, and will share information only where there is a lawful and legitimate reason.

- Information will normally be shared on a need-to-know basis.
- Confidentiality cannot be promised where disclosure is necessary to safeguard a child or adult at risk, investigate a serious allegation, comply with law or allow a fair response.
- Records should distinguish fact, allegation, opinion and decision.
- Evidence and records will be stored securely and retained in accordance with the Academy's retention arrangements and any safeguarding/legal requirements.
- Publication of disciplinary outcomes will be exceptional and considered against privacy, safeguarding, fairness and legal obligations.

14. Responsibilities, monitoring and review

Directors and senior management are responsible for ensuring that this policy is implemented, that conflicts of interest are managed and that suitably competent people are appointed to investigate and decide cases. Coaches, instructors, employees and volunteers must cooperate honestly with reasonable investigations and preserve relevant evidence.

This policy will be reviewed at least annually and sooner where there are significant changes to law, Acas guidance, safeguarding guidance, Academy structure or lessons from a serious complaint or disciplinary case.

The policy framework takes account of the Equality Act 2010, UK GDPR and Data Protection Act 2018, Working Together to Safeguard Children 2026 for child-safeguarding matters, and the Acas Code of Practice on disciplinary and grievance procedures for employment cases. At the date of issue, Acas has consulted on a draft replacement Code, but that draft is not yet in force; the existing Code remains the operative Code until a replacement takes effect.

Appendix A - Sanctions guidance matrix

This matrix is guidance only. It is not a tariff. The decision-maker must consider the individual facts, safeguarding risk, previous relevant history and mitigation. Serious conduct may justify a higher-level response without progressing through every warning stage.

Category	Examples	Possible outcomes
Level 1 - Minor / first concern	Low-level disrespect; minor breach of etiquette or procedure; isolated conduct with limited impact and no safeguarding risk.	Informal advice; coaching conversation; restorative action; verbal warning; reminder of code; short improvement plan.
Level 2 - Repeated / significant misconduct	Repeated Level 1 conduct; bullying; serious disrespect; unsafe practice; social-media misconduct; refusal to follow reasonable safety instructions; dishonest conduct of moderate seriousness.	Written/final warning; required training; supervision; conditions; temporary activity/event restriction; removal from representative duties.
Level 3 - Serious / gross misconduct	Violence outside legitimate supervised training; serious harassment/discrimination; serious safeguarding breach; deliberate unsafe conduct; serious dishonesty; retaliation; serious abuse of position; criminal conduct connected to Academy activity.	Interim suspension while investigated; long suspension; removal from role; permanent exclusion; employment action where applicable; referral to statutory/regulatory authorities.
Breach of suspension/conditions	Knowingly ignoring a restriction, suspension or safeguarding condition.	Extension/escalation of restriction; final warning; exclusion; referral where appropriate.
Administrative compliance	Failure to maintain mandatory insurance, qualification, DBS status or other required eligibility where applicable.	Immediate pause from the affected role/activity until compliance is restored; further action if deliberate or repeated.

Safeguarding and safety

Where the behaviour may indicate abuse, neglect, grooming, exploitation or a criminal offence, the safeguarding or statutory referral route applies regardless of where the behaviour appears in this matrix.

Appendix B - Formal Complaint Form

Use this form where practical. A complaint will not be rejected solely because this form was not used.

Complainant name	
Preferred contact details	
Person(s) complained about	
Date / time / location	
Summary of complaint	
Witnesses / people with relevant information	
Evidence attached or available	
Action already taken / who else has been told	
Outcome sought	
Safeguarding concern? If yes, explain	
Reasonable adjustment / communication support needed	
Confidentiality request and reason	
Signature / date	

Appendix C - Investigation & Case Management Record

- ☐ Safeguarding / emergency triage completed
- ☐ Conflict-of-interest check completed
- ☐ Complainant acknowledged
- ☐ Respondent notified at appropriate stage
- ☐ Investigator appointed
- ☐ Terms/scope of investigation recorded
- ☐ Evidence list created and preserved

- ☐ Relevant witnesses identified
- ☐ Reasonable adjustments considered
- ☐ External agency restrictions or advice recorded
- ☐ Interim measures considered and reviewed
- ☐ Investigation report completed
- ☐ Case review decision recorded and communicated

Case reference	
Case Manager	
Investigating Officer	
Date complaint received	
Allegations / issues within scope	
Issues outside scope / referred elsewhere	
Key evidence considered	
Witnesses interviewed	
Interim measures and review dates	
Findings / case to answer recommendation	
Case review decision	
Reasons for decision	
Date parties notified	

Appendix D - Disciplinary Hearing Record

Case reference	
Hearing date / format	
Panel / Chair	
Respondent and supporter/representative	
Charge(s)	
Evidence considered	
Witnesses	
Respondent response / mitigation	
Finding for each charge	
Reasons	
Sanction / action	
Duration / review arrangements	
Appeal deadline	
Date written outcome issued	

Appendix E - Appeal Form

Appeals should normally be submitted within 10 working days of the written decision.

Appellant name	
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Case reference	
Decision being appealed	
Ground(s) of appeal	
New evidence and why it was not previously available	
Outcome requested	
Reasonable adjustment / support needed	
Signature / date	
Appeal decision	
Reasons	
Date outcome issued	

Policy approval

Approved by	
Role	
Signature	
Approval date	
Next review	September 2027 or sooner if required