

## Complaints Policy and Procedure Policy

### Introduction

Harrow International School welcomes suggestions and comments from parents and guardians, and takes seriously complaints they may raise; it recognises the entitlement of parents to raise complaints, and seeks to work with parents in the best interests of the pupils in its care. Complaints will be treated as an expression of genuine dissatisfaction that needs a response.

The School wishes to ensure that:

- Parents wishing to make a complaint know how to do so.
- It responds to complaints within a reasonable time and in a courteous and efficient way.
- Parents realise that the School listens and takes complaints seriously.
- It takes action in response to complaints where appropriate.

### The School defines a complaint as:

An expression of worry or doubt over an issue considered to be important for which reassurances are sought and appropriate action taken, and an expression of specific dissatisfaction about particular actions taken or a lack of action.

### Who to complain to:

It is hoped that most complaints will be resolved quickly and informally. A parent can communicate a concern and complaint to the School verbally, by letter or email. Any member of staff will be happy to help, but it is usually best to start with the Tutor or House Master / House Mistress in the Upper School and the Class Teacher / Year Leader in the Lower School and Class Teacher / Assistant Head in Early Years; they may be able to sort things out quickly, with the minimum of fuss. However, the School recognises that in some instances parents may prefer to take the matter to a member of the Senior Leadership Team or the Head.

In the case of formal written complaints about members of staff, the following guidelines apply:

- Complaints about teachers or TAs in the Lower School should be addressed to the Head of Lower School.
- Complaints about teachers or TAs in the Upper School should be addressed to the Principal Deputy Head (Curricular).
- Complaints about House Masters/House Mistresses should be addressed to the Principal Deputy Head (Pastoral and Wellbeing).
- Complaints about administrative staff should be addressed to the Head of Administration.
- Complaints about senior members of staff should be addressed to the Head.
- Complaints about the Head should be addressed to the Chair of Governors.

If a parent raises a complaint after their child has left the School, it must be in the form of a letter to the Head within three months of their child leaving the School.

## **Confidentiality**

Every complaint will be treated with respect and in a confidential manner. Knowledge of it will be limited to the person to whom it is addressed, the Head and those directly involved. The Chair of Governors and members of the Board of Governors and AISL Executive Officers may also need to be informed. It is the School's policy that complaints made by parents should not reflect adversely on their children. However, the School cannot entirely rule out the need to make third parties outside the School aware of the complaint and possibly also the identity of those involved. This would be likely to happen where, for example, a pupil's safety was at risk or it became necessary to refer matters to the police. Parents would be fully informed.

## **Informal Resolution of Complaints**

It may be possible to resolve the matter immediately and to parents' satisfaction. Whether the matter is raised face-to-face, by telephone or by email.

## **Formal Resolution of Complaints**

The School hopes that parents will feel satisfied with the informal resolution of any complaint, or at least that they have been fully and fairly considered. However, if parents feel that a complaint has not been dealt with to their satisfaction, they should proceed to the Formal Complaints process.

## **Boarding Complaints**

A Boarding Complaints Policy and Procedure is attached as an Appendix to this policy. In accordance with Standard 14 of the National Minimum Standards for Boarding Schools (DFE 2022) and the MSB (BSO) August 2023, the School's written records of complains identifies those complaints relating to boarding provision separately from complaints relating to school practice and notes any action taken by the school as a result of those complaints. The Boarders' Complaints Policy and Procedure is available to boarders on House notice boards and in the Boarders' Handbook as well as an Appendix to the School's Complaints Policy and Procedure.

## **Procedures**

The complaints process is divided into three stages:

<b>STAGE</b>	<b>DESCRIPTION</b>
<b>Stage I</b>	Informal raising of a complaint notified orally or in writing to a member of staff. Usually a Tutor, Class Teacher, Housemaster, Housemistress or member of the Senior Leadership Team.
<b>Stage II</b>	A formal complaint made in writing to the Head.
<b>Stage III</b>	An unresolved formal complaint, progressed as a last resort to the Governing Body

### **1. Stage 1**

Stage 1 aims to resolve the complaint informally, through the appropriate senior manager(s). Examples might include dissatisfaction about an aspect of teaching or pastoral care, a billing error or some other aspect of the school's systems, equipment or operational procedures.

## **Procedures**

- Where a complaint has been made it should be treated as an informal complaint. The staff member to whom the complaint has been made will listen to and record in writing the complaint. These notes will be kept on file for at least one year. Copies of any written response to the complaint and related documentation, including copies of all communication between the staff and the complainant will also be kept on file.

- If possible, the staff member will offer resolution and/or reassurance at this meeting. If further information is required, a senior leader will investigate, reconvening with the complainant no more than 14 working school days after the initial meeting. In most cases this second meeting should be face-to-face, though a telephone call may be appropriate for smaller issues with positive resolutions.
- If the complainant remains dissatisfied following this informal approach, the complaint should be forwarded to the Head (and becomes a Formal Complaint – Stage II).

## **2. Stage II: Formal Complaint**

In Stage II, formal written complaints are considered by the Head.

- Whether a complainant has previously raised the complaint with a senior manager or not, progression to Stage II requires a formal written letter of complaint, addressed to the Head.
- The Head will acknowledge the complaint in writing as soon as possible after receiving it. This will normally be within 5 working school days.
- The complainant will be asked to supply as much detail regarding the complaint as possible, completing the 'Formal Complaints Form', which will also accompany the acknowledgement.
- The complainant will be invited to meet with the Head within 14 working school days of receipt of the written complaint. If this is not possible the school will write to explain the reason for the delay, giving a date by which the Head is available. Where appropriate, and with due regard to privacy and balance in participant numbers, the Head will invite relevant members of staff to this meeting (for example, if subject-technical or phase-specific expertise is required).
- Where necessary the complaint will be investigated, and a meeting called with the complainant within 10 working school days of the original meeting.
- With the relevant details established, the Head will provide a written response to the complainant. This response will give a full explanation of the Head's decision and the reasons for it. If follow-up action is needed, this will also be indicated in the response. If not presented in person at the outset, the written response will also be accompanied by an invitation to meet the Head to discuss the response.
- The Head will keep written, signed and dated records of all meetings and telephone conversations, and other related documentation, including the formal response.
- If the complainant remains unsatisfied with the outcome of the Stage II investigation and the School's findings, the complaint may be progressed to Stage III – Governor Review.

## **3. Stage III: Appeal Panel - Governor Review**

If parents are still not satisfied with the School's response to their complaint, they have the right to proceed to an appeal and can request that the matter be referred to the School's Appeal Panel for consideration. This request should be made in writing to the Chair of Governors within 14 working school days of the decision made by the Head.

The Chair of Governors will appoint a panel of at least three persons not directly involved in the matters detailed in the complaint, at least one whenever possible of whom shall be independent of the management and running of the School, to look at the issues in an impartial and confidential manner.

The purpose of Stage III of the School's Complaints Policy is to give the complaint a fair hearing in front of a panel who have no prior knowledge of the details of the complaint and who can, therefore, consider it without prejudice.

The Appeal Panel Chairman will acknowledge the complaint and schedule a hearing to take place as soon as is practicable and within 14 working school days. The parents may attend the hearing, and may be accompanied by one other person if they wish. This may be a relative or friend, but not a legal representative. After due consideration, the Appeal Panel will reach a decision and may make recommendations; it will write to the parents within 10 working school days of the hearing to inform them of the decision and the reasons for it. A copy of its findings and recommendations (if any) will be sent to the parents and, where relevant, the person complained about, as well as the Chair of Governors and the Head. The decision of the Appeal Panel is final.

A written record is kept by the Head's Executive Assistant of all formal written complaints whether they are resolved at the preliminary stage or proceed to a Complaints Panel Hearing. Correspondence, statements and records relating to individual complaints are kept confidential except where disclosure is required under any relevant legal authority. The Complaints Log notes the stage at which the complaint was resolved and the actions taken by the school as a result of those complaints regardless of whether they are upheld.

## **Procedures**

- Unless the complaint is made against the Head personally, it will have been through Stage II and received a written response (if this isn't the case, complaints addressed directly to the Governing Body that have not been through Stage II will be reverted to the Head). In the event of the former, or if the complainant is unhappy with the outcome of Stage II, a written request for review, clearly stating the reasons that it is being made, should be sent to the Chair of Governors.
- The Chair of Governors will acknowledge receipt of the request for review within 5 working school days. A copy of this document will be enclosed with the acknowledgement.
- The Chair of Governors will convene an Appeal Panel, constituted of three persons not directly involved in matters detailed in the complaint. A member of the School's Board of Governors will act as Chair of the Panel (this will not necessarily be the Chair of Governors). The Head will not be a member of this Panel, although will attend, if appropriate. In addition to the panel of governors, a member of the School's administrative staff will act as clerk to the panel with a full record of the process being recorded.
- The complainant will be asked to supply as much detail regarding the complaint as possible 5 working days before the Appeal Panel Hearing. The Panel will also ask the School to supply all corresponding documentation, including a written report detailing procedures followed and actions taken to date in the same timeframe.
- The complainant will be invited to meet with the Appeal Panel within 14 working school days of receipt of the written complaint. If this is not possible the school will write to explain the reason for the delay, giving a date by which the Panel is available. In the event that a complainant arrives at the meeting with previously undisclosed participants, the Appeal Panel reserves the right to deny those parties access to the meeting, or to adjourn the meeting.
- With the agreement of the Chair of the Panel, and having informed the complainant prior, the Head may invite members of staff directly involved in matters raised by the complainant to attend relevant portions of the meeting.
- As a general rule, no evidence or witnesses previously undisclosed will be introduced into the meeting by any of the participants. If either party wishes to do so, the meeting will be adjourned so that the other party has a fair opportunity to consider and respond to the new evidence.
- If necessary, the Appeal Panel may need to carry out further investigations prior to reaching a conclusion.
- In closing the meeting, the Chair of the Panel will explain that the Panel will now consider its decision (or require further information) and that written notice of the decision will be sent to the Head and the complainant within 14 working school days.
- The Panel will then:
  - decide on the appropriate action to be taken to resolve the complaint;
  - recommend, where appropriate, to the Governing Body, changes to the School's systems or procedures to ensure that similar problems do not happen again.
- With a final decision made, the Appeals Panel will provide a written response to the complainant and where relevant the person complained about. This response, presented within 10 working school days of the last meeting with the complainant, will give a full explanation of the Panel's decision and the reasons for it. If follow-up action is needed, this will also be indicated in the response.
- The Head's Executive Assistant will keep a copy of the final decision, all notes and correspondence on file in the School's records which will be available for Inspection by the Chair of Governors and Executive Officers of AISL.
- The Appeals Panel decision is to be considered final and binding.

#### 4. Serial and Persistent Complainants

There may be occasions when, despite all stages of the above procedure having been followed, the complainant remains dissatisfied. If a complainant tries to re-open the same issue, the Chair of Governors can inform them that the procedure is completed and that the matter is closed.

If the complainant contacts the school again on the same issue, then the correspondence may be viewed as 'serial' or 'persistent' and the school may choose not to respond. However, the decision not to respond must be taken with due consideration of whether:

- the School has taken every reasonable step to address the complainant's needs;
- the complainant has been given a clear statement of the School's position and their options (if any);
- they are contacting the School repeatedly but making substantially the same points each time;
- the School has reason to believe the individual is contacting them with the intention of causing disruption or inconvenience;
- their letters/emails/telephone calls are often, always or increasingly abusive or aggressive;
- they make insulting personal comments about or threats towards staff.

Whilst the School may not stop responding to an individual making a complaint, where the complainant has been through all three complaint stages the School will consider the matter to be closed.

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

- 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 cooperate with the complaints investigation process while still wishing their complaint to be resolved;
- refuses to accept that certain issues are not within the scope of a complaints procedure;
- insists on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice;
- 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;
- 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 a Complaints Review Panel;
- seeks an unrealistic outcome;
- makes excessive demands on school time by frequent, lengthy, complicated and stressful contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.

Before concluding that a complaint is 'unreasonable', the Head / Chair of Governors or member of the Board of Governors will discuss any concerns with the complainant.

The School does not respond to anonymous complaints.

Should a parent wish to know how many formal complaints the School receives in any one year, they should email ([info@harrowschool.hk](mailto:info@harrowschool.hk)) and the information will be provided.

## FORMAL COMPLAINTS FORM

I wish to make a complaint about the School; I have already discussed the matter informally, but now wish to invoke the formal complaints procedure.

NAME OF COMPLAINANT			
NAME OF CHILD (if appropriate)		HOUSE/YEAR/CLASS	
MEMBER(S) OF STAFF PREVIOUSLY SPOKEN TO IN RELATION TO THE COMPLAINT		DATE OF MEETING	
CONTACT DETAILS	EMAIL:		
	TELEPHONE:		

Please give as much information about the complaint as possible, using additional sheets as necessary. Please include as many dates, names and specific details as possible. You may also attach to this document any further materials relating to the complaint.

SIGNED:

DATE: