



TOWNLEY  
— EST 1937 —  
GRAMMAR SCHOOL

# COMPLAINTS POLICY

## 1. Introduction and aims

Townley Grammar School Trust - endeavours to provide the best possible education for all of its pupils in an open and transparent environment. We welcome any feedback that we receive from Parents/ carers, pupils and third parties, and we accept that not all of this will be positive.

Where concerns are raised the school intends for these to be dealt with:

- Fairly
- Openly
- Promptly
- Without prejudice

Our overall aim is to ensure that when responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants' desire for confidentiality
- Treat complainants with respect and courtesy
- Make sure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement evaluation processes

We try to resolve complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed. The school will aim to give the complainant the opportunity to complete the complaints procedure in full. To support this, we will make sure we publicise the existence of this policy and make it available on the school website. Throughout the process, we will be sensitive to the needs of all parties involved, and make any reasonable adjustments needed to accommodate individuals.

Townley Grammar has considered the legislation and guidance in relation to complaints. These procedures have been drawn up in the light of guidance from the DfE Best Practice for School Complaints Procedures 2020.

## 2. The difference between a concern and a complaint

A concern may be defined as '*an expression of worry or doubt over an issue considered to be important for which reassurances are sought*'.

A complaint may be defined as '*an expression of dissatisfaction however made, about actions taken or a lack of action*'.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaints procedure. Townley Grammar School takes concerns seriously and will make every effort to resolve the matter as quickly as possible.

If you have difficulty discussing a concern with a particular member of staff, we will respect your views. In these cases, you will be referred to another staff member. Similarly, if the member of staff directly involved feels unable to deal with a concern, you will be referred to another staff member. The member of staff may be more senior but does not have to be. The ability to consider the concern objectively and impartially is more important.

We understand however, that there are occasions when people would like to raise their concerns formally. In this case, Townley Grammar School will attempt to resolve the issue internally, through the stages outlined within this complaint's procedure.

## 3. Resolving concerns informally

Our school will take informal complaints seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.

Exceptions	Who to contact
Admissions to schools, Statutory assessments of Special Educational Needs, School reorganisation proposals	<p>Concerns about admissions, statutory assessments of Special Educational Needs, or school reorganisation proposals should be raised with Bexley Local Authority.</p> <p><i>School Admission:</i> The Bexley Local Authority coordinates school admissions. Contact Bexley School Admissions Service for specific information and assistance. You are also welcome to contact the school's admissions team, who can provide information about the school's specific admission process and requirements.</p> <p style="text-align: right;">Bexley Admissions Service Telephone: 0208 303 7777 Email: <a href="mailto:schooladmissions@bexley.gov.uk">schooladmissions@bexley.gov.uk</a> Website: <a href="http://Bexley.gov.uk - school-admissions">Bexley.gov.uk - school-admissions</a></p> <p><i>Statutory Assessments of Special Educational Needs:</i></p>

Local Authority: Your local authority's Special Educational Needs (SEN) team is responsible for assessing and supporting children with SEN.

*For Bexley residents, please visit the Bexley Local Offer by clicking on the following link:*

<https://www.bexleylocaloffer.uk/Page/14558>. The Bexley Local Offer provides information about services and support available for children and young people with special educational needs and disabilities in the local area.

**SENDCo:**

If you're considering applying for a Statutory Education Needs Assessment (EHCNA), know that support is available. The school's SENDCo (nswart@townleygrammar.org.uk) is here to support and guide you through the process.

**IPSEA:**

You can contact IPSEA for impartial advice and guidance on supporting your child's educational needs.

The most updated information and contact information can be found on their website: <https://www.ipsea.org.uk/>

**School Reorganisation Proposals:**

Local Authority: The Bexley local authority is responsible for proposing and implementing school reorganisation plans.

Telephone: 0208 303 7777

Email: [schooladmissions@bexley.gov.uk](mailto:schooladmissions@bexley.gov.uk)

Website: [Bexley.gov.uk - school-admissions](https://www.bexley.gov.uk/school-admissions)

<p>Matters likely to require a Child Protection Investigation</p>	<p>Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance.</p> <p>If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH).</p> <p><b>LADO:</b>            Contact: Ed Snelgar            Tel: 0203 045 3436 (LADO Team)            Email: <a href="mailto:LADO@bexley.gov.uk">LADO@bexley.gov.uk</a>            Post: LADO and Safer Organisations Advisor, Bexley Council, Civic Offices, 2 Watling Street, Bexleyheath, Kent, DA6 7AT</p> <p><b>Bexley MASH</b>            Telephone: 020 3045 5440            Business hours (Monday to Friday 9am to 5pm)            Out of hours 020 8303 7777 or 020 8303 7171 (Monday to Friday and weekends 6pm to 8am)            Email: <a href="mailto:Childrensocialcare.admin@bexley.gov.uk">Childrensocialcare.admin@bexley.gov.uk</a>            Post: Civic Offices, 2 Watling Street, Bexleyheath, DA6 7AT</p>
<p>Exclusion of children from school*</p>	<p>Further information about raising concerns about exclusion can be found at:  <a href="http://www.gov.uk/school-discipline-exclusions/exclusions">www.gov.uk/school-discipline-exclusions/exclusions</a>.  <i>*Complaints about the application of the behaviour policy can be made through the school's complaints procedure. Please refer to the school's behaviour policy</i></p>

Whistleblowing	<p>We have an internal whistleblowing procedure for all our employees, including temporary staff and contractors. Please refer to the school's whistleblowing policy which can be found on the website.</p> <p>The Secretary of State for Education is the prescribed person for matters relating to education for whistleblowers in education who do not want to raise matters directly with their employer. Referrals can be made at: <a href="http://www.education.gov.uk/contactus">www.education.gov.uk/contactus</a>.</p> <p>Volunteer staff who have concerns about our school should complain through the school's complaints procedure. You may also be able to complain directly to the LA or the Department for Education (see link above), depending on the substance of your complaint.</p>
Staff grievances	Complaints from staff will be dealt with under the school's internal grievance procedures.
Staff conduct	<p>Complaints about staff will be dealt with under the school's internal disciplinary procedures, if appropriate.</p> <p>Complainants will not be informed of any disciplinary action taken against a staff member because of a complaint. However, the complainant will be notified that the matter is being addressed.</p>
Complaints about services provided by other providers who may use school premises or facilities	Providers should have their own complaints procedure to deal with complaints about service. Please contact them directly.
National Curriculum - content	Please contact the Department for Education at: <a href="http://www.education.gov.uk/contactus">www.education.gov.uk/contactus</a>
Subject Access Requests and Freedom of Information Request	<p>Any written (including email) expression of dissatisfaction with a FOI request or SAR should be handled through Townley Grammar School's existing complaints procedure.</p> <p>Wherever practicable the review should be handled by someone not involved in the original decision. The Trustees should set and publish a target time for determining complaints and information on the success rate in meeting the target.</p>

	<p>If the outcome is that Townley Grammar School's original decision or action is upheld, then the applicant can appeal to the Information Commissioner.</p> <p>The appeal can be made via their website or in writing to: Customer Contact, Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.</p>
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For the purpose of this procedure concerns are defined as having a worry or doubt over an issue considered to be important for which reassurances are sought. The majority of concerns can be dealt with without resorting to the formal stages of the formal complaint's procedure. Townley Grammar School encourages those that have concerns to raise them with the appropriate person at the school (e.g. your students' class teacher) and to work constructively with that person towards resolving them. The extent to which this was both attempted and followed may be taken into consideration when assessing the reasonableness of a complaint during the formal stages of the procedure complaints.

## 4. Who can make a complaint

This complaints policy and procedure is not limited to parents or carers of children that are registered at the school. Any person, including members of the public, may make a complaint to Townley Grammar School about any provision of facilities or services that the school provides. Unless complaints are dealt with under separate statutory procedures (such as appeals relating to exclusions or admissions), this complaints procedure will be used.

## 5. Scope and complaints that fall outside of this procedure

Complaints relating to the following issues are covered by a separate/specific policy:

- Admissions to schools
- School re-organisation proposals
- Statutory assessments of special educational needs
- Matters likely to require a child protection investigation
- Exclusion of children from school
- Whistleblowing
- Staff grievances
- Staff conduct complaints
- Complaints about services provided by other providers who may use school premises or facilities
- Complaints about the curriculum
- Complaints about collective worship
- Withdrawal from the curriculum

## **6. When investigating a complaint, we will try to clarify:**

- What has happened
- Who was involved
- What the complainant feels would put things right

## **7. Anonymous complaints**

We will not normally investigate anonymous complaints. However, the headteacher or Chair of Trustees, if appropriate, will determine whether the complaint warrants an investigation.

## **8. Complaints received outside of term time**

We will consider complaints made outside of term time to have been received on the first school day after the holiday period.

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

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing.

## **10. The timescale for making a complaint**

Notification of a complaint should be given as soon as possible after the issue that led to the complaint has occurred and when informal attempts to seek resolution have proved unsuccessful.

Complaints that are submitted three months after the issue that led to the complaint occurred will not be considered under this procedure unless there are exceptional circumstances. Where a series of associated incidents have occurred, the complaint should be raised within three months of the last of these incidents. These may include (but are not limited to) subsequent information about the complaint coming to light and a valid explanation of why it was not possible to give notification of the complaint sooner. In such cases the clerk to the Trustees will review the circumstances, seek advice and determine whether the complaint should be considered under the formal procedure.

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or Tribunals, this may impact on the school's ability to adhere to the timescales within this procedure or result in the procedure being suspended until those public bodies have completed their investigations. If a complainant commences legal action against Townley Grammar in relation to their complaint, the complaints procedure in relation to their complaint will be suspended until those legal proceedings have concluded.

## **11. Covert recording**

Complainants should obtain the informed consent of all parties before recording conversations or meetings; the school reserves the right to refuse permission for a complainant to use a recording that has been obtained covertly in the complaints process.

## **12. Duplicate complaints**

After closing a complaint at the end of the complaint's procedure, if the school receives a duplicate complaint relating to the incident from another representative of the child concerned, the school will inform the new complainant that the school has already considered that complaint and the process is complete. The school should advise the new complainant to contact the Department for Education should they be dissatisfied with the school's handling of the original complaint. Any new aspects to the original complaint will be investigated and dealt with to the full extent of the complaint's procedure.

## **13. Formal complaints**

The formal stages of the procedure should be followed when all attempts to resolve concerns informally have proved unsuccessful, and in cases where individuals wish to raise their concern formally.

## **14. Maintaining records**

A confidential written record of all complaints that are made in accordance with this procedure will be kept by the school. The written record will include whether the complaint has been resolved following a formal procedure and whether it proceeded to a panel review meeting. It will also refer to any action taken by the school as a result of the complaint regardless of whether it has been upheld.

## **15. Maintaining confidentiality**

Informal concerns and complaints will be dealt with confidentiality at all stages and at the conclusion of the procedure. Confidentiality should be maintained at all times by everyone involved. The school requests that complaints are not discussed publicly, including via social media. Any actions that may be taken in relation to school staff that arise because of the complaint will remain confidential to the school and the member of staff concerned. Written records taken and used throughout the complaints process, including correspondence, notes of meetings, telephone calls etc. will be kept securely and in accordance with the principles of the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

## 16. Safeguarding

Wherever a concern indicates that a child's wellbeing or safety is at risk, the school is duty bound to report this immediately to the local authority. Any action taken will be in accordance with the school's safeguarding policy which can be found on each school's website.

## 17. The Formal Stages of the Complaints Procedure

The majority of concerns can be dealt with without resorting to the formal stages of the procedure. If you need to raise a formal complaint the process is as follows:

There are two formal stages of the complaint's procedure.

### 17.1 Stage 1 – formal investigation

A formal complaint about an individual, using the stage one process, will be investigated as follows:

Complaints about school staff	<p>Complaints against school staff are dealt with by the headteacher (stage 1), then a committee of members of the governing body (stage 2).</p> <p>Complaints against the headteacher are dealt with by a suitably skilled member of the Trust Board (stage 1) and then a committee of members of the Trust Board (stage 2)</p>
Complaint about Trustees	<p>Complaints against the chair of trustees or any individual trustees are made to the clerk to the governing body (the clerk), the clerk should then arrange for the complaint to be heard. This can be done by a suitably skilled and impartial member of the governing body (stage 1) and then a committee of members of the governing body (stage 2).</p> <p>Complaints against the entire governing body or complaints involving both the chair and vice chair should also be sent to the clerk, who should then determine the most appropriate course of action. This will depend on the nature of the complaint.</p> <p>This may involve sourcing an independent investigator to complete stage 1 and co-opted governors from other schools to hear the complaint at stage 2.</p>

Formal complaints must be made to the headteacher (unless they are about the headteacher), via the school office or directly to the headteacher's email at:

[headteacher@townleygrammar.org.uk](mailto:headteacher@townleygrammar.org.uk) . This may be done in person, in writing (preferably on the Complaint Form), or by telephone.

The headteacher will record the date the complaint is received and the complainant will receive an acknowledgement of the complaint in writing (either by letter or email) within 5 school days.

Within this response, the headteacher will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the complainant would like to see. The headteacher can consider whether a face-to-face meeting is the most appropriate way of doing this.

Note: The headteacher may delegate the investigation to another member of the school's senior leadership team but not the decision to be taken.

During the investigation, the headteacher (or investigator) will:

- if necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish
- keep a written record of any meetings/interviews in relation to their investigation.

At the conclusion of their investigation, the headteacher will provide a formal written response within 20 school days of the date of receipt of the complaint.

If the headteacher is unable to meet this deadline, they will provide the complainant with an update and revised response date.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions that Townley Grammar School will take to resolve the complaint.

The headteacher will advise the complainant of how to escalate their complaint should they remain dissatisfied with the outcome of Stage 1.

If the complaint is about the headteacher, or a member of the governing body (including the Chair or Vice-Chair), a suitably skilled trustee will be appointed to complete all the actions at Stage 1.

Complaints about the headteacher or member of the governing body must be made to the Clerk, via the school office.

If the complaint is:

- jointly about the Chair and Vice-Chair or
- the entire governing body or
- the majority of the governing body

The school may consider an independent investigator appointed by the Clerk of the governing body. At the conclusion of their investigation, the independent investigator will provide a formal written response.

## **17.2 Stage 2 - Meeting with members of the Trustees complaints committee**

If the complainant is dissatisfied with the outcome at Stage 1 and wishes to take the matter further, they can escalate the complaint to Stage 2 – a meeting with members of the governing body's complaints committee, which will be formed of the first three, impartial, Trustees available. This is the final stage of the complaint's procedure.

A request to escalate to Stage 2 must be made to the Clerk, via the school office, within 5 school days of receipt of the Stage 1 response.

The Clerk will record the date the complaint is received and acknowledge receipt of the complaint in writing (either by letter or email) within 5 school days.

Requests received outside of this time frame will only be considered if exceptional circumstances apply. The Clerk will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 20 school days of receipt of the Stage 2 request. If this is not possible, the Clerk will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will decide when to hold the meeting. It will then proceed in the complainant's absence based on written submissions from both parties.

The complaints committee will consist of at least three trustees with no prior involvement or knowledge of the complaint. Prior to the meeting, they will decide amongst themselves who will act as the Chair of the Complaints Committee. If there are fewer than three trustees from Townley Grammar available, the Clerk will source any additional, independent governors through another local school or through their LA's Governor Services team, in order to make up the committee. Alternatively, an entirely independent committee may be convened to hear the complaint at Stage 2.

The committee will decide whether to deal with the complaint by inviting parties to a meeting or through written representations, but in making their decision they will be sensitive to the complainant's needs.

If the complainant is invited to attend the meeting, they may bring someone along to provide support. This can be a relative or friend. The Department for Education does not encourage either party to bring legal representatives to the committee meeting. There may be occasions when legal representation is possibly appropriate, for instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation. However, these committees are not a form of legal proceedings.

Note: Complaints about staff conduct will not generally be handled under this complaint's procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 10 school days before the meeting, the Clerk will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the committee at least 7 school days before the meeting.

Any written material will be circulated to all parties at least 5 school days before the date of the meeting. The committee will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The committee will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the procedure.

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. Prior knowledge and consent of all parties attending must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The committee will consider the complaint and all the evidence presented. The committee can:

- uphold the complaint in whole or in part
- dismiss the complaint in whole or in part

If the complaint is upheld in whole or in part, the committee will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future.

The Chair of the Committee will provide the complainant and Townley Grammar School with a full explanation of their decision and the reason(s) for it, in writing, within 15 school days.

The letter to the complainant will include details of how to contact the Department for Education if they are dissatisfied with the way their complaint has been handled by Townley Grammar School.

If the complaint is:

- jointly about the Chair and Vice-Chair or
- the entire governing body or
- the majority of the governing body

Stage 2 will be heard by a committee of independent governors.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions Townley Grammar School will take to resolve the complaint.

The response will also advise the complainant of how to escalate their complaint should they remain dissatisfied.

### **17.3 Next Steps**

If the complainant believes the school did not handle their complaint in accordance with the published complaints procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the Department for Education after they have completed Stage 2.

The Department for Education will not normally reinvestigate the substance of complaints or overturn any decisions made by Townley Grammar School. They will consider whether Townley Grammar School has adhered to education legislation and any statutory policies connected with the complaint.

The complainant can refer their complaint to the Department for Education online at: [www.education.gov.uk/contactus](http://www.education.gov.uk/contactus), by telephone on: 0370 000 2288 or by writing to:  
Department for Education, Piccadilly Gate, Store Street, Manchester, M1 2WD

## **18. Serial, persistent and unreasonable complaints**

Townley Grammar School is committed to dealing with all complaints fairly and impartially, and to providing a high-quality service to those who complain. We will not normally limit the contact complainants have with our school. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive, or threatening.

Definition:

Townley Grammar School defines unreasonable behaviour as that which hinders our consideration of complaints because of the frequency or nature of the complainant's contact with the school, such as, if the complainant:

- Refuses to fully 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 complaint's investigation process;
- Refuses to accept that certain issues are not within the scope of the complaint's procedure;

- Insists on the complaint being dealt with in ways which are incompatible with the complaint's procedure or with good practice;
- Introduces what can be reasonably deemed as trivial or irrelevant information which they expect to be taken into account and commented on
- Raises large numbers of detailed questions, not central to the complaint and insists they are fully answered, outside of what is set down in the complaints policy.
- Changes the basis of the complaint as the investigation proceeds, any new information may be treated as a new complaint.
- 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 Department for Education;
- Seeks an unrealistic within the constraints of what the school is able to offer.
- Makes excessive demands on school time while the complaint is being dealt with;
- Uses threats to intimidate
- Uses abusive, offensive or discriminatory language or violence;
- Knowingly provides false or falsifies information; and/or 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.

### **3. Contact whilst a complaint is being investigated**

Complainants should limit the number of communications with the school that relates to their complaint, while the complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text), as it could delay the outcome being reached.

For the purpose of this procedure a complaint may be viewed as serial and/or persistent if it relates to the same issue that was the subject of a previous complaint (made by the same complainant) which has already been through a formal complaints procedure in which the complainant has been notified of the outcome. In such cases it is likely that the complainant will be informed that the matter is now closed and that the school will provide no further response.

A complaint may be viewed as unreasonable if it contains threatening, abusive or offensive language or fails to adhere to our Complaints Policy and procedures.

A complaint may be considered unreasonable if the person making the complaint does so:

- using language that may be deemed as confrontational or intimidating
- using threats or violence
- using abusive, offensive or discriminatory language
- providing information that they know to be false
- by sharing information through social media and/or other media outlets.

In response to any serious incident of aggression or violence, the concerns and actions taken will be put in writing immediately and the police informed. This may include barring an individual from school premises.

In this instance, the school is not under obligation to follow up the complaint.

#### **4. Steps taken before marking a complaint as ‘unreasonable’**

Townley Grammar School takes all complaints seriously and follows the Complaints Policy and Procedure in order to seek an agreed and amicable resolution and reconciliation. All complaints will be considered as reasonable in the first instance and nothing in this policy prevents a parent from raising a genuine new concern or complaint.

Whenever possible, the Head Teacher or Chair of Governors will discuss any concerns with the complainant informally before applying an ‘unreasonable’ marking.

If the unreasonable behaviour continues, the Head Teacher will write to the complainant explaining that their behaviour is unreasonable and ask them to change it. For complainants who excessively contact Townley Grammar School causing a significant level of disruption, we may specify methods of communication and limit the number of contacts in a Communication Plan. This will be reviewed after six months.

In response to any serious incident of aggression or violence, we will immediately inform the Police and communicate our concerns and actions in writing. This may include barring an individual from Townley Grammar School

In the case of a serious incident or if an individual continues to make or pursue unreasonable complaints, Townley Grammar School may impose any or all of the following actions:

- Provide the complainant with a single point of contact via an email address;
- Limit or restrict communication directly or indirectly to students or staff;
- Limit the number of times the complainant can make contact, such as a fixed number per term;
  - Ask the complainant to engage a third party to act on their behalf, such as [Citizens Advice](#);
- Set alternative arrangements for parent consultations;
- Bar the individual from the school premises, grounds and/or events;

- Put any other strategy in place as necessary.

However, before any decision is made, the individual will always have the right to express their views on any such proposal.

If an individual continues to make or pursue unreasonable complaints, Townley Grammar School reserves the right to seek further legal advice and take such steps as are appropriate in all the circumstances, including, for example, seeking court orders to limit the individual's contact with or presence in or near to the school premises, any students, staff, parents/carers, or other third parties as set out in the court order.

### **5. Serial or persistent complaints**

If the complainant contacts the school again regarding 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 believe we have taken all reasonable steps 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 repeatedly, making substantially the same points each time, and we believe their intention is to cause disruption or inconvenience.

The case to stop responding is stronger if:

- 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 with the intention of causing disruption or inconvenience.

When we stop responding, we will inform the individual that we intend to do so. We will also explain that we will still 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.

### **6. Duplicate complaints**

If we have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, we will assess whether there are aspects that we had not previously considered, or any new information we need to take into account.

If we are satisfied that there are no new aspects, we will:

- Tell the new complainant that we have already investigated and responded to this issue, and that the local process is complete.
- Direct them to the DfE if they are dissatisfied with our original handling of the complaint

If a duplicate complaint is raised which, in the view of the school, warrants further consideration, the procedure outlined in Sections 7.2 or 7.3 (as appropriate) will be repeated.

### **7. Complaint campaigns**

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

- Publishing a single response on the school website; and/or sending a template response to all of the complainants.

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

### **8. Anonymous complaints**

Anonymous complaints will not normally be investigated. However, the Head Teacher or, if appropriate, the Chair of Governors will determine whether the complaint warrants an investigation.

## Appendix 1- Formal Complaints Form

This form should be emailed to: [ctuplin@townleygrammar.org.uk](mailto:ctuplin@townleygrammar.org.uk)

Name:	
Name of pupil, year group and your relationship to them (where applicable):	
Contact address:	
Contact telephone day:	
Contact telephone mobile:	
Contact email address:	
Details of the complaint:	

<p>Action taken so far (including staff member who has dealt with it so far) or solutions offered:</p>	
<p>The reason that this was not a satisfactory resolution for you:</p>	
<p>What action would you like to be taken to resolve the problem?</p>	

## Appendix 2 - Roles and Responsibilities relating to the complaints procedure

Complainant	<p>The complainant will receive a more effective response to the complaint if they:</p> <ul style="list-style-type: none"> <li>● explain the complaint in full as early as possible</li> <li>● cooperate with the school in seeking a solution to the complaint</li> <li>● respond promptly to requests for information or meetings or in agreeing the details of the complaint</li> <li>● ask for assistance as needed</li> <li>● treat all those involved in the complaint with respect</li> <li>● refrain from publicising the details of their complaint on social media and respect confidentiality.</li> </ul>
Investigator	<p>The investigator's role is to establish the facts relevant to the complaint by:</p> <ul style="list-style-type: none"> <li>● providing a comprehensive, open, transparent and fair consideration of the complaint through: <ul style="list-style-type: none"> <li>○ sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved</li> <li>○ interviewing staff and children/young people and other people relevant to the complaint</li> <li>○ consideration of records and other relevant information</li> <li>○ analysing information</li> <li>○ liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right.</li> </ul> </li> </ul> <p>The investigator should:</p> <ul style="list-style-type: none"> <li>● conduct interviews with an open mind and be prepared to persist in the questioning</li> <li>● keep notes of interviews or arrange for an independent note taker to record minutes of the meeting</li> <li>● ensure that any papers produced during the investigation are kept securely pending any appeal</li> <li>● be mindful of the timescales to respond</li> <li>● prepare a comprehensive report for the headteacher or complaints committee that sets out the facts, identifies solutions and recommends courses of action to resolve problems.</li> </ul> <p>The headteacher or complaints committee will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details.</p>

<p>Complaints Co-ordinator (this could be the headteacher/ designated complaints governor or other staff member providing administrative support)</p>	<p>The complaints co-ordinator should:</p> <ul style="list-style-type: none"> <li>• ensure that the complainant is fully updated at each stage of the procedure</li> <li>• liaise with staff members, headteacher, Chair of Governors, Clerk and LAs (if appropriate) to ensure the smooth running of the complaints procedure</li> <li>• be aware of issues regarding: <ul style="list-style-type: none"> <li>◦ sharing third party information</li> <li>◦ additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person</li> </ul> </li> <li>• keep records.</li> </ul>
<p>Clerk to the Governing Body</p>	<p>The Clerk is the contact point for the complainant and the committee and should:</p> <ul style="list-style-type: none"> <li>• ensure that all people involved in the complaint procedure are aware of their legal rights and duties, including any under legislation relating to school complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR)</li> <li>• set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible</li> <li>• collate any written material relevant to the complaint (for example; stage 1 paperwork, school and complainant submissions) and send it to the parties in advance of the meeting within an agreed timescale</li> <li>• record the proceedings</li> <li>• circulate the minutes of the meeting</li> <li>• notify all parties of the committee's decision.</li> </ul>
<p>Committee Chair</p>	<p>The committee's chair, who is nominated in advance of the complaint meeting, should ensure that:</p> <ul style="list-style-type: none"> <li>• both parties are asked (via the Clerk) to provide any additional information relating to the complaint by a specified date in advance of the meeting</li> <li>• the meeting is conducted in an informal manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy</li> <li>• complainants who may not be used to speaking at such a meeting are put at ease. This is particularly important if the complainant is a child/young person</li> <li>• the remit of the committee is explained to the complainant</li> <li>• written material is seen by everyone in attendance, provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR.</li> </ul> <p>If a new issue arises it would be useful to give everyone the opportunity to consider and comment upon it; this may require a short adjournment of the meeting</p>

	<ul style="list-style-type: none"> <li>• both the complainant and the school are given the opportunity to make their case and seek clarity, either through written submissions ahead of the meeting or verbally in the meeting itself</li> <li>• the issues are addressed</li> <li>• key findings of fact are made</li> <li>• the committee is open-minded and acts independently</li> <li>• no member of the committee has an external interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure</li> <li>• the meeting is minuted</li> <li>• they liaise with the Clerk (and complaints coordinator, if the school has one).</li> </ul>
Committee Member	<p>Committee members should be aware that:</p> <ul style="list-style-type: none"> <li>• the meeting must be independent and impartial, and should be seen to be so</li> </ul> <p>No governor may sit on the committee if they have had a prior involvement in the complaint or in the circumstances surrounding it.</p> <ul style="list-style-type: none"> <li>• the aim of the meeting should be to resolve the complaint and achieve reconciliation between the school and the complainant</li> </ul> <p>We recognise that the complainant might not be satisfied with the outcome if the meeting does not find in their favour. It may only be possible to establish the facts and make recommendations.</p> <ul style="list-style-type: none"> <li>• many complainants will feel nervous and inhibited in a formal setting</li> </ul> <p>Parents/carers often feel emotional when discussing an issue that affects their child.</p> <ul style="list-style-type: none"> <li>• extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting</li> </ul> <p>Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated.</p> <p>The committee should respect the views of the child/young person and give them equal consideration to those of adults.</p> <p>If the child/young person is the complainant, the committee should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the committee should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend.</p> <p>However, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the committee considers is not in the child/young person's best interests.</p> <ul style="list-style-type: none"> <li>• welfare of the child/young person is paramount.</li> </ul>

