



St Paul's School

FOUNDED 1509

Complaints Procedure

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This policy is available on the Handbook page of the School Intranet and the policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made by email to: HMEA@stpaulsschool.org.uk

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued and to always consider the best interests of the child. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We operate within a culture of openness and recognise and accept that abuse can happen in any organisation.

1. Introduction

This policy applies to complaints raised by current parents. While the School will respond to complaints raised by former parents, there is no obligation to address these under the School complaints policy.

The majority of concerns from parents, carers and others are handled under the following general procedures. The procedure is divided into three stages. The informal stage aims to resolve the concern through informal contact at the appropriate level in school. Stage two is the first formal stage at which written complaints are considered by the High

Master or delegated person. Stage three is the next stage once stage two has been worked through, involving an appeal panel of governors.

- 1.1 St Paul's School ("the School") gives high priority to the quality of the educational provision. However, if parents do have a complaint it is our intention:
 - To deal with complaints promptly
 - To resolve a complaint by informal means if at all possible
 - To deal with a complaint with sensitivity and to maintain confidentiality at all times
 - To be impartial at all times
 - To ensure that a thorough investigation is carried out of all matters giving rise to the complaint and to provide appropriate redress, where necessary
- 1.2 Initial concerns by parents will be taken seriously and parents are encouraged to speak to their child's Tutor as soon as an issue is of concern to them. Staff will try to resolve issues promptly and they will log all complaints received, whether verbal or written. The School will follow the Procedure set out below.
- 1.3 In accordance with paragraph 32(1)(b) of Schedule 1 to the Education (Independent School Standards) Regulations 2014, the School will make available to parents of pupils and prospective pupils and provide, on request, to the Chief Inspector, the Secretary of State or an independent inspectorate, details of the complaints procedure and the number of complaints registered under the formal procedure during the preceding school year.
- 1.4 Please note that for the purposes of this procedure "working days" refers to weekdays (Monday to Friday) during term time.

2. What Constitutes a Complaint?

- 2.1 A complaint is an expression of dissatisfaction with a real or perceived problem. It may be made about the School as a whole, about a specific department or about an individual member of staff, and any matter about which a parent is unhappy and seeks action by the School is within the scope of this procedure. A complaint is likely to arise if a parent believes that the School has done something wrong, failed to do something that it should have done or has acted unfairly towards their child.
- 2.2 Parents can be assured that all concerns and complaints will be treated seriously and confidentially. The School is here for your child and you can be assured that your child will not be penalised for a complaint that you or your child raises in good faith.
- 2.3 The following are exempt from this complaints policy, because they are covered by separate procedures: matters likely to require a child protection investigation; whistleblowing; staff grievances and disciplinary procedures; and complaints about services provided by other providers who may use school premises or facilities.

3. Stage 1 – Informal Resolution

- 3.1 It is hoped that most concerns will be resolved quickly and informally.
- 3.2 If parents have a concern or complaint they should normally contact their child's Tutor (SPS) or Form Tutor (SPJ). They may do so in person, by telephone or in writing (such as email). In many cases, the matter will be resolved swiftly, by these means, to the parents' satisfaction. If the Tutor cannot resolve the matter alone, or if the complaint relates to the Tutor, he/she will consult the appropriate Undermaster (SPS), Head of Year (SPJ), or a relevant Head of Department or line manager.
- 3.3 Concerns expressed directly to a Head of Department, Undermaster (SPS), Head of Year (SPJ) or senior members of staff will usually be dealt with by that person, but, depending on the substance of the concern, may be referred to another, appropriate colleague better equipped to deal with the concern.
- 3.4 If the concern or complaint is made in writing, it will be acknowledged by telephone or in writing (such as email) within two working days of receipt during term time and as soon as practicable in the holidays.
- 3.5 A written record of informal complaints will be made and the date on which they were received. Should the matter not be resolved within 10 working days or in the event that an informal resolution has failed to reach a satisfactory resolution then parents will be advised to pursue their complaint formally in accordance with stage 2 of this procedure.
- 3.6 Parents and boarders can contact the regulatory authority ISI or the Local Authority Designated Officer (LADO) regarding any complaint concerning the welfare of a boarder. Details of how to contact ISI are given at the end of this procedure in the Appendix. The name and contact details for the LADO at Richmond, who has responsibility for St Paul's and St Paul's Juniors is stated in the Safeguarding and Child Protection Policy. Alternatively, you should be able to find these details on the Richmond Local Safeguarding Children Board (LSCB) website.

4. Stage 2 – Formal Resolution

- 4.1 If the complaint cannot be resolved on an informal basis, then the parents should put their complaint in writing to the High Master formally. The nature of the complaint must be stated as clearly and precisely as possible, with supporting evidence; it must contain a statement of what actions parents have already taken to resolve the matter; and it must include a statement of what actions parents feel might resolve their complaint. The High Master, or someone on their behalf, will acknowledge receipt of the complaint within 2 working days of receipt, or as soon as practicable in the holidays. The High Master will either investigate the issues that have been raised or will delegate the investigation to another senior member of staff not so far involved with the complaint ("the Delegated Person"), who will often be the Head of SPJ, the Surmaster or the Third Master.
- 4.2 In most cases, the High Master or the Delegated Person will speak to or meet the

parents concerned to discuss the matter within 10 working days of receiving the complaint in writing. If possible, a resolution will be reached at this stage.

- 4.3 It may be necessary for the High Master or the Delegated Person to carry out further investigations and these will begin as soon as possible. This can include interviews with staff, pupils and other relevant people. If the investigation uncovers any concerns relating to safeguarding, then these will be investigated in accordance with the school's safeguarding policy and procedures.
- 4.4 The High Master or the Delegated Person will keep written records of all meetings and interviews held in relation to the complaint.
- 4.5 Once the High Master or the Delegated Person is satisfied that, so far as is practicable, all the relevant facts have been established, a decision will be made and parents will be informed of this decision in writing within 20 working days of receipt of the complaint by the High Master. The High Master or the Delegated Person will give reasons for their decision. Please note that any complaint received within 20 working days of the end of term or half term is likely to take longer to resolve owing to the presence of school holidays and the unavailability of personnel.
- 4.6 If the complaint is against the High Master, then the Chair of Governors (or the nominated Governor to whom the Chair has delegated the handling of the complaint) will call for a full report from the High Master and for all the relevant documents. The Chair of Governors or nominated Governor may also call for a briefing from members of staff, and will in most cases, speak to or meet with parents to discuss the matter further. Once the Chair of Governors or nominated Governor is satisfied that, so far as practicable, all of the relevant facts have been established, the parents will be informed of the decision in writing. The Chair of Governors or nominated Governor will give reasons for his/her decision.
- 4.7 If parents are still not satisfied with the decision, they should request a panel hearing under stage 3 of this procedure.

5. Stage 3 – Panel Hearing

- 5.1 If (following a failure to reach an earlier resolution under Stage 2) parents wish to request a panel hearing, the request must be made in writing to the High Master within 20 working days from the date of the stage 2 decision letter, stating the outcome they desire and all the grounds of the complaint. The request will only be considered if the procedures at Stages 1 and 2 have been completed. The parents will be referred to The Clerk to the Governors, who has been appointed by the Governors to call hearings of the Complaints Panel. The parents should enclose with their request for a panel hearing copies of any documents they consider to be relevant. Each case will be viewed individually and independently.
- 5.2 The matter will then be referred to the Complaints Panel for consideration. The purpose of this arrangement is to provide parents with the opportunity to present their arguments

in front of a panel of governors who have no prior knowledge of the details of the case and who can, therefore, consider it without prejudice. The Stage 3 Panel Hearing will be a full-merits hearing of the complaint: facts will be established and recommendations made which will provide reassurance that the complaint has been taken seriously.

- 5.3 The Clerk to the Governors, on behalf of the Panel, will acknowledge the request for a panel hearing in writing within two working days of receiving the request (or as soon as is practicable in the holidays) and will schedule a hearing to take place within 20 working days of receiving the written request from the parents. The Panel will consist of three persons not directly involved in the matters detailed in the complaint, two Governors and a person independent of the School. The Chairman of Governors will not normally be a member of the panel. The Clerk to the Governors shall appoint each of the Panel members.
- 5.4 If the Panel deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the hearing. Copies of such particulars shall be supplied to all parties not later than 3 working days prior to the hearing.
- 5.5 Parents will be invited to attend the Stage 3 Panel hearing in writing or by email. The School will make every effort to ensure that the arrangements for the panel hearing are reasonable in order to facilitate parents' attendance. The parents may be accompanied to the hearing by one other person. This may be a relative, teacher or friend.
- 5.6 In the event of a parent not exercising the right to attend a Stage 3 Panel Hearing, the School will proceed with the hearing in accordance with the terms of this Complaints Policy.
- 5.7 After establishing the facts the Complaints Panel may:
 - Dismiss the complaint if the Panel considers the complaint is not made out; and
 - Uphold the complaint if the Panel considers that the complaint is made out.
- 5.8 It is not within the powers of the Panel to make any financial award, nor to impose sanctions on staff, pupils or parents. The Panel may make recommendations on these or any other issues to the High Master or the full Board of Governors as appropriate.
- 5.9 If possible, the Complaints Panel will reach a decision without the need for further investigation and will write to parents with its decision within 5 working days of the hearing.
- 5.10 Where further investigation is required, the Complaints Panel will decide how it should be carried out and the hearing will be adjourned. The decision of the Panel will be final.
- 5.11 The Complaint Panel's decision and recommendations, if any, will be sent in writing or electronic mail to the parents, the High Master and, where relevant and appropriate, to the staff involved and the person complained about, and shall be made available for inspection at the School by the Board of Governors and by the High Master. If the parents

do not wish to receive the decision by electronic mail, a copy will be given or posted to them.

- 5.12 A formal written record of all complaints will be kept for a period of seven years, whether they are resolved at the informal stage, the formal stage or proceed to a panel hearing and any action taken by the School as a result of the complaint (regardless of whether the complaint is upheld). Where the complaint relates to a safeguarding matter, records will be kept for the period of the independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if it is longer.

At the School's discretion, additional records may be kept which may contain the following information:

- Date when the issue was raised
 - Name of parent
 - Name of pupil
 - Description of the issue
 - Records of all the investigations (if appropriate)
 - Witness statements (if appropriate)
 - Name of member(s) of staff handling the issue at each stage
 - Copies of all correspondence on the issue (including emails, records of phone conversations and minutes of any meetings)
- 5.13 Parents can be assured that all concerns and complaints will be treated seriously and confidentially. Correspondence, statements and records will be kept confidential except in so far as is required of the School under Section 109 of the Education and Skills Act 2008 and paragraph 25(k) of Schedule 1 to the Education (Independent Schools Standards) Regulations 2010; where access is requested by the Secretary of State or where disclosure is required in the course of the School's inspection; or where any other legal obligation prevails.
- 5.14 The School's complaints procedure is publicised on the School's website. A copy of the procedure is also available to view at the School during the school day, in the office of the High Master's EA with information regarding the number of complaints made in the preceding academic year. The School will always provide a copy of the complaints procedure to parents or prospective parents on request. Any request should be made to the High Master directly or to their EA.

6. Closure of Complaints

- 6.1 Very occasionally, the School will feel that it needs to close a complaint where the complainant is still dissatisfied. Despite the School's attempts to resolve a complaint, it

is sometimes not possible to meet all of the complainant's wishes and there must be an agreement to disagree.

- 6.2 If a complainant persists in making representations to the School, then it can be extremely time-consuming and detract from our responsibility to look after all the children in our care. For this reason, the school is entitled to close correspondence (including personal approaches, telephone calls, letters or emails) on a complaint where the School feels it has taken all reasonable action to resolve the complaint and the complaint has exhausted our official process.
- 6.3 Where a complainant has been through the School's internal complaints procedures and is still unhappy with the outcome or decision from the Governing Body, then the DFE School Complaints Unit can be contacted via the DFE website. The DFE advise that unless the school is shown to have behaved unreasonably or not to have followed their own procedures, there is likely to be little further action that can be taken, as Governing Bodies are empowered to deal with many issues without reference to either the local authority or the secretary of state.

7. Unreasonable Complaints, and Serial and Persistent Complainants

- 7.1 The 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 the 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.
- 7.2 The School defines serial and unreasonable complainants as *'those who, because of the frequency or nature of their contacts with the school, hinder our consideration of their or other people's complaints'*.
- 7.3 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 co-operate 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 the Department for Education;
- 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, either while the complaint is being dealt with or at other times.

7.4 A complaint may also be considered unreasonable if the person making the complaint does so either face-to-face, by telephone or in writing or electronically:

- maliciously;
- aggressively;
- using threats, intimidation or violence;
- using abusive, offensive or discriminatory language;
- attempting to disguise their identity including use of false email addresses or withheld phone numbers;
- knowing it to be false;
- using falsified information;
- publishing unacceptable information in a variety of media such as in social media websites and newspapers.

7.5 Complainants should limit the numbers of communications with a school while a complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, telephone, email or text) as it could delay the outcome being reached.

7.6 Whenever possible, the High Master or Chair of Governors will discuss any concerns with the complainant informally before applying an 'unreasonable' judgement. If the behaviour continues the High Master will write to the complainant explaining that their behaviour is unreasonable and asking them to change it. For complainants who excessively contact the 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 usually be reviewed after 6 months.

7.7 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 banning an individual from the School.

Appendix

1. Relevant Addresses and Phone Numbers

The School's Senior Management Team below are contactable on 020 8748 9162.

Mrs Sally-Anne Huang	High Master
Dr Fran Clough	Surmaster
Mr James Gazet	Third Master
Mr Dan Pirrie	Deputy Head Academic
Mr Nick Watkins	Deputy Head Pastoral
Dr Tom Killick	Deputy Head Co-curricular
Mr Sam Madden	Deputy Head Mental Health, Wellbeing & Lifeskills
Dr Andy Mayfield	Director of Admissions
Mr Tahmer Mahmoud	Director of Teaching and Learning
Mr Paul Doyle	Designated Safeguarding Lead
Mr Simon Holmes	Director of Assessment
Mr Oliver Snowball	Head of St Paul's Juniors
Ms Tanya Zalar	SPJ Deputy Head Academic
Mr Nick Arnold	SPJ Deputy Head Pastoral

2. Contacting ISI

The School is inspected by ISI, an independent organisation which reports to the Government on schools. Parents and pupils have the right to contact an inspector if they have a complaint concerning a pupil's welfare. ISI will usually expect parents or pupils to have followed the School's formal complaints procedure before contacting them. However, you can report your concerns to ISI at:

Independent Schools Inspectorate
CAP House
9 - 12 Long Lane
London EC1A 9HA
Telephone 020 7600 0100
Email: info@isi.net

3. Official Bodies

Independent Schools Inspectorate (ISI) www.isi.net

Richmond Single Point of Access team (SPA)

https://www.richmond.gov.uk/single_point_of_access
Telephone: 020 8547 5008 and 020 8770 5000 (out of hours)
Email: spa@richmond.gov.uk
1st Floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ