

Complaints policy

Action	Policy to be reviewed biennially		
	Owner	Date	Completed
Review	Senior Deputy	April 2026	✓
Approved	High Mistress	June 2026	✓
Next Review		Summer 2028	

To be published on the following:	
Staff Portal	✓
School website	✓

Complaints policy

Who this policy applies to

This policy is addressed to all members of staff, governors, volunteers and parents of students who are enrolled in the school.

What this policy is for

The policy provides guidelines for handling complaints. Separate procedures apply in the event of a child protection issue (see the school's Safeguarding (Child Protection) policy), or if the High Mistress expels or requires the removal of a student and the parents seek a Governors' Review of that decision (see the school's Expulsion, Removal and Review policy).

St Paul's Girls' School has long prided itself on the quality of the teaching and pastoral care provided to its pupils. However, if parents do have a complaint, they can expect it to be treated by the school with care and in accordance with this Complaints Procedure. The school makes its Complaints Procedure available to all parents of pupils and of prospective pupils on the school's website and in the school office during the school day, and the school will ensure that parents who request it are made aware that this document is published or available and of the form in which it is published or available, and of the number of complaints registered under the formal procedure during the preceding School year.

The school will be mindful of its obligations under the Equality Act 2010 in the application of this policy.

In accordance with paragraph 32(1) of Schedule 1 to the Education (Independent School Standards) Regulations 2014, the school will also make available, on request, to ISI, the Department for Education (DfE) or the Independent Schools Inspectorate (ISI), details of this Complaints Procedure and the number of complaints registered under the formal procedure during the preceding School year.

This policy only relates to parents of current students who are enrolled in the school. Complaints by parents of former pupils will be dealt with under this Complaints Procedure only if the complaint was initially raised when the pupil to which the complaint relates was still registered as a pupil at the school.

Although the school endeavours to manage complaints in an open and transparent manner, parents should be aware that there may be circumstances which mean the school is unable to share complete details about how a complaint has been handled by the school, the evidence collated, steps taken in response or other related matters. This could be the case even when a complaint is upheld. For example, this may be because such information constitutes sensitive third-party data (for example belonging to a staff member, student or other parent), legal or regulatory requirements prohibit disclosure, or withholding information is in accordance with specific instructions from a statutory agency. This list is not exhaustive.

Legal framework

- Part 7 of the Education (Independent School Standards) Regulations 2014

Other relevant school policies

- Safeguarding (Child Protection) policy
- Expulsion, Removal and Review policy

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1 Introduction

- 1.1 **Circulation:** This policy is addressed to all members of staff, governors, volunteers and parents. A copy can be downloaded from the school's website or is available on request from the school office.
- 1.2 This policy can be made available in large print or other more accessible format, if required. If assistance is required with making a complaint, for example because of a disability, parents should contact the Senior Deputy Head who will be happy to make appropriate arrangements.
- 1.3 A concern may be defined as 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.'
- 1.4 A complaint may be defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action.'
- 1.5 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. The school takes concerns seriously and will make every effort to resolve the matter as quickly as possible.
- 1.6 **Parent(s) / You:** Includes a current parent or legal guardian of a child currently on roll at the school and may include a parent whose child has recently left the school but only if the complaint was initially raised when the student was still on roll at the school.
- 1.7 **Three stages:** This policy describes a three-stage procedure:
- **Stage 1:** informal raising of a concern or a complaint notified orally or in writing to a member of staff
 - **Stage 2:** a formal complaint in writing to the High Mistress
 - **Stage 3:** a reference to the Complaints Panel
- 1.8 **Timescales:** The school aims to resolve any complaints in a timely manner. Timescales for each stage are set out below in the relevant paragraphs. When the school refers to working days, the school means Monday to Friday, when the school is open during term time. The dates of terms are published on the school's website. Parents must raise the complaint or concern within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. The school will only consider complaints or concerns made outside of this time frame if exceptional circumstances apply.
- 1.9 **Parents should immediately notify the person they believe is best placed to take urgent action if they have a concern about their child's safety. Any concerns should be confirmed in writing to the Senior Deputy Head.**
- 1.10 Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis, and it may also prevent them from considering complaints at a later, more formal, stage.

2 Policy aim and statement

- 2.1 **Aim:** Our school ethos promotes open communication with parents and encourages a continuing dialogue between home and school throughout a child's education. The aim of this policy is to ensure that a complaint is managed sympathetically, efficiently and at the appropriate level, and resolved as soon as possible. The school will try to resolve every complaint in a positive way with the aim of putting right a matter which may have gone wrong and, where necessary, reviewing its systems and procedures in light of the circumstances.

- 2.2 **Policy statement:** Any issues which arise are normally dealt with informally through discussion and parents are fully involved in key decisions which affect their child. Contact details for pastoral and academic staff are available from the school office. The school encourages parents to use these channels should an issue arise as the school needs to know as soon as possible if there is any cause for dissatisfaction or concern. Complaints will always be dealt with in accordance with this policy. Parents and students should never feel (or be made to feel) that a complaint will be taken amiss or will adversely affect a student or their opportunities at this school where the complaint is raised in good faith.
- 2.3 In accordance with equality law, the school will consider making reasonable adjustments if required, to enable complainants to access and complete this complaints procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations.

3 Management of complaints

- 3.1 **Complaints coordinator:** The Senior Deputy Head is responsible for the coordination and administration of the Complaints Procedure. If the Senior Deputy Head is unavailable or is the subject of the complaint, their duties will be carried out by another senior member of staff. The main responsibilities of the Senior Deputy Head are to:
- be the first point of contact while the matter remains unresolved and keep records
 - coordinate the complaints procedures in school
 - arrange assistance for parents who require this, for example, because of a disability
 - maintain an ongoing training programme for all school employees in relation to complaints
 - monitor the keeping, confidentiality and storage of records in relation to complaints
 - report regularly to the High Mistress and the governors' Education Committee with respect to complaints
- 3.2 **Anonymous Complaints:** The school will not normally investigate anonymous complaints. However, the High Mistress or Chair of Governors, if appropriate, will determine whether the complaint warrants an investigation.
- 3.3 **Complaints against school staff:** should be made in the first instance to the Senior Deputy Head.
- 3.4 **Complaints against the High Mistress:** should be addressed to the Chair of Governors. The Chair of Governors can be reached through the Clerk to Governors by letter to St Paul's Girls' School, Brook Green, London W6 7BS or by emailing clerk@spgs.org.

Complaints against governors: should be made to the Clerk to Governors who can be reached by emailing clerk@spgs.org.

4 Stage 1: complaints and concerns

- 4.1 The school expects that most complaints, where a parent seeks intervention, reconsideration or some other action to be taken, can be resolved informally. Examples might include dissatisfaction about some aspect of teaching or pastoral care, or about allocation of privileges or responsibilities, or about a timetable clash or some other aspect of the school's systems or equipment, or a billing error. Complaints of discrimination, harassment or victimisation are taken very seriously and may need to be dealt with formally. Governors are informed of the nature of stage 1 complaints and concerns in order to monitor trends.
- 4.2 The complaints process for Data Protection matters is set out in the school's Privacy Notice.
- 4.3 **Notification:** If appropriate, please raise the complaint initially as follows:

- 4.3.1 **education issues:** if the matter relates to the classroom, the curriculum or special educational needs, parents are asked to speak or write to their child's form tutor or relevant head of department as appropriate. If appropriate, the matter may be referred to the Deputy Head (Academic).
- 4.3.2 **pastoral care:** for complaints relating to matters outside the classroom, parents are asked to speak or write to their child's form tutor or head of year. If appropriate the matter may be referred to the Deputy Head (Pastoral) or to the Deputy Head, Deputy Head (Senior School).
- 4.3.3 **disciplinary matters:** a problem over any disciplinary action taken or a sanction imposed should be raised first of all with the member of staff who imposed it, and, if not resolved, with the head of year. If appropriate the matter may be referred to the Senior Deputy Head.
- 4.3.4 **financial matters:** a query relating to fees or extras should be raised in the first instance with the school's Accounts office. If appropriate, the matter may be referred to the Bursar.
- 4.4 **Acknowledgement:** The school will acknowledge a written notification by telephone, email or letter within five working days of receipt during term time. In the holidays the acknowledgement will be made as soon as is practicable and not later than five working days beyond the start of the next term or half term. Depending on the nature of the complaint, the appropriate member of staff will arrange to either speak with the parent over the phone or invite them to a meeting, within ten working days.
- 4.5 **Unresolved complaints:** A complaint which has not been resolved by informal means to the parent's satisfaction within 15 working days should be notified to the school in writing as a formal complaint which will be dealt with in accordance with Stage 2 below.

5 **Stage 2: formal complaint**

- 5.1 **Notification:** If the complaint cannot be resolved on an informal basis then the parents should put their complaint in writing to the High Mistress. The High Mistress may require further information from the parents to help clarify the scope and nature of their concerns. The High Mistress may in some circumstances deem it appropriate to nominate a staff member to hear the complaint and manage the Stage 2 complaint process. The High Mistress (or their nominee) will decide, after considering the complaint, the appropriate course of action to take. A formal complaint will be acknowledged by telephone, email or letter within five working days during term time, as soon as is practicable in the holidays and not later than five working days beyond the start of the next term or half term, indicating the action that is being taken and the likely time scale.
- 5.2 **Investigation:** The school will treat complaints in as confidential a manner as possible. Discussions of the case will be limited to the High Mistress (or their nominee), those that she needs to consult with, and she may ask a senior member of staff to act as **Investigator** and/or may involve one or more Governors.
- 5.3 **Initial Meeting:** In most cases, the High Mistress (or their nominee) will meet with the parents concerned, within 10 working days of receiving the complaint, to discuss the matter. If possible, a resolution will be reached at this stage. It may be necessary for further investigations to be carried out. The High Mistress (or their nominee) will determine who should carry out any investigation and this may be someone external to the school. Written records will be kept of all formal meetings and interviews held in relation to the complaint.
- 5.4 The outcome of the investigation will be reviewed by the High Mistress who will then notify the parents by letter of their decision and the reasons for it. Written records will be kept of all meetings and interviews held in relation to the complaint.
- 5.5 **Outcome:** Once the High Mistress (or their nominee) is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made and parents will be informed

of this decision in writing. The Head (or their nominee) will also give reasons for their decision. In most cases, the Head (or their nominee) will make their decision and provide the parents with reasons within 25 working days of the complaint being put in writing (or following the provision of any further clarificatory information about the complaint to the High Mistress, if so requested). Should an extension be required for any reason (for example, due to the complexity of the matters being investigated), this will be notified and explained to the parents. Please note that any complaint received within one month of the end of term or half term is likely to take longer to resolve due to school holidays and the unavailability of personnel. In these circumstances the resolution will be communicated within 25 working days of the start of the new term or half term. If parents are still not satisfied with the decision, they should proceed to Stage 3 of this procedure.

- 5.6 **Complaint against the High Mistress:** If the complaint is against the High Mistress, the complaint should be made to the Chair of Governors. The Chair of Governors will nominate someone to determine the complaint. The Stage 2 process described above will then be followed as if the references to the High Mistress (or their nominee) is to the individual nominated by the Chair of Governors to determine the complaint against the High Mistress.

6 Stage 3: reference to the Complaints Panel

- 6.1 The school hopes that any parent will judge that their complaint has been fully and fairly considered. If a parent is not satisfied, they may request that their complaint be referred to the Complaints Panel. A Complaints Panel (**Panel**) hearing is a review of the decision taken by the High Mistress (or their nominee) at Stage 2. The Panel is not able to consider any new areas of complaint which have not been previously raised as part of the complaints procedure.
- 6.2 **The role of the Panel:** The Panel's task is to establish the facts surrounding the complaints that have been made by considering:
- the documents provided by both parties and
 - any representations made by the parents and the High Mistress (or their nominee).
- 6.3 After establishing the facts, the Panel will consider whether to uphold the complaint, in whole or in part, or dismiss the complaint. They will make these decisions on the balance of probabilities.
- 6.4 It is not within the powers of the Panel to make any financial award, nor to impose sanctions on staff, students, or parents. The Panel may make recommendations on these or any other issues to the High Mistress or to the full Governing Body as appropriate.
- 6.5 **Composition:** The school will constitute a Complaints Panel of at least three people who were not directly involved in the matters detailed in the complaint comprising school governor members, and an independent member who is independent of the governance, management and running of the school.
- 6.6 **Notification:** To request a hearing before the Complaints Panel parents should write to the Clerk to the Governors within five working days of receipt of the Stage 2 decision. Requests will usually only be considered if the procedures for an informal (Stage 1) and then a formal complaint (Stage 2) have been completed. A copy of all relevant documents and the parents' full contact details should accompany the letter to the Clerk. The letter should also state all the grounds of the complaint and should include a list of the documents which the parents believe to be in the school's possession and that they wish the Panel to see. The Clerk will acknowledge the request in writing within five working days. Requests received during half terms or school holidays will be responded to as soon as practicable and in any case within five working days of the start of the new term or half term. If assistance is required, for example, because of a disability, the Clerk will be happy to make appropriate arrangements.
- 6.7 To the extent the parents are unable to provide their complaint within the time period stipulated due to extenuating circumstances which have impeded the parents from taking action, the

parents should request an extension in writing. Such a request should be made to the Clerk in advance of the original deadline, setting out the further time period requested and the reason for this. This will be considered.

- 6.8 **Convening the Panel:** The Clerk to the Governors will convene the Complaints Panel as soon as reasonably practicable and the Panel hearing will take place within twenty working days of the receipt of the request. However, parents should note that the Panel will not normally sit during half terms or school holidays.
- 6.9 **Notice of hearing:** As soon as reasonably practical and in any event, at least seven working days before the hearing, the Clerk will send the parents written notification of the date, time and place of the hearing, together with brief details of the Panel members who will be present.
- 6.10 **Attendance:** Parents will be invited to attend the hearing and may be accompanied by one other person such as a relative or friend. The Stage 2 decision taker shall also be entitled to be accompanied to the hearing by one other person if they wish. This may be a relative, friend or other member of staff. The hearing is not a legal proceeding, and so legal representation will not be appropriate, and the companion should not be a lawyer. Copies of additional documents that parents wish the Panel to consider should be sent to the Clerk at least five working days prior to the hearing. The Clerk will circulate a copy of the documents to be considered by the Complaints Panel to all parties at least three days prior to the hearing.
- 6.11 **Chair:** The hearing will be chaired by one member of the Panel (chosen by themselves) and will be conducted in an informal manner.
- 6.12 **Hearing:** All statements made at the hearing will be unsworn. All present will be entitled, should they wish to do so, to write their own notes for reference purposes. The Clerk will be asked to take handwritten minutes of the proceedings. This will not be a verbatim note but an accurate reflection of what was discussed. Notes of the hearing will be shared with attendees as soon as practicable after the hearing. To the extent there is any disagreement about the content of those notes or further comments from the parties, these will be considered by and, where possible, resolved by the Chair. A copy of any comments on the notes will be appended to the notes. Electronic recordings of meetings or conversations are not normally permitted unless a complainant's own disability or special needs require it. In this instance, prior knowledge and consent of all parties attending must be sought before meetings or conversations take place.
- 6.13 **Evidence:** The Chair of the Panel will conduct the hearing in such a way as to ensure that all those present have the opportunity of asking questions and making comments in an appropriate manner. The hearing is not a legal proceeding, and the Panel shall be under no obligation to hear oral evidence from witnesses but may do so and/or may take written statements into account.
- 6.14 **Conduct:** All those attending the hearing are expected to show courtesy, restraint and good manners or, after due warning, the hearing may be adjourned or terminated at the discretion of the Chair. If terminated, the original decision will stand. Any person who is dissatisfied with any aspect of the way the hearing is conducted must say so before the proceedings go any further and their comment will be minuted.
- 6.15 **Adjournment:** The Chair may, at their discretion, adjourn the hearing for further investigation of any relevant issue. This may include an adjournment to take legal advice.
- 6.16 **Decision:** After due consideration of the matters discussed at the hearing, the Panel shall reach a decision unless there is an agreed position. The Panel's decision will be final. The Panel's decision, findings and any recommendations shall be confirmed in writing to the complainant and where relevant the person complained about within seven working days of the hearing (although additional time may be required if it is necessary to carry out further investigations following the hearing). In addition, the decisions, findings and any recommendations will be sent to the Chair of Governors and the Stage 2 decision maker. Reasons for the decision will be given. The decision may include recommendations that will be sent to the parents, the Chair of the Governing Body, the High Mistress and, where relevant, any person about whom the complaint has been made.

6.17 **Private proceeding:** A hearing before the Complaints Panel is a private proceeding. No notes or other records or oral statements about any matter discussed in or arising from the proceeding shall be made available directly or indirectly to the press or other media.

6.18 The completion of Stage 3 represents the conclusion of the school's complaints procedure.

7 Record keeping

7.1 A written record will be kept of concerns and all formal complaints, and of whether they are resolved at stage 2 or proceed to a panel hearing. The number of complaints registered under the formal procedure during the preceding school year are published on the school website.

7.2 Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under Section 108 or 109 in the Education and Skills Act 2008 requests access to them.

7.3 In accordance with data protection principles, details of individual complaints will be kept only for as long as is considered to be reasonably necessary in the circumstances.

7.4 A written record will be kept of the action taken by the school as a result of any complaint that reaches stage 2, regardless of whether the complaint is upheld.

8 Other matters

8.1 Where repeated attempts are made by a parent to raise the same complaint after it has been considered at all three stages, this will be regarded by the school as vexatious and outside the scope of this procedure. In the event of a vexatious complaint being received the school will follow the [best practice guidance for school complaints procedures](#).

8.2 At each stage in the procedure, the school wants to resolve the complaint. If appropriate, the school will acknowledge that the complaint is upheld in whole or in part. In addition, the school may offer one or more of the following:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that the school will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review school policies in light of the complaint
- an apology.

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

Availability of this policy

A copy of this policy may be downloaded from our website <http://www.spgs.org/school-policies> or is available on request from the school office, St Paul's Girls' School, Brook Green, London, W6 7BS (tel: 020 7603 2288). This policy can be made available in large print or other accessible format if required.