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1. INTRODUCTION

- 1.1. St Faith's takes great pride in the quality of its teaching and pastoral care and in the openness of its relationship with its parents. St Faith's is committed to delivering a high quality of academic teaching and pastoral care. This policy provides a structure for the resolution of such complaints as parents may from time to time have about particular aspects of the provision made for their children's education at St Faith's. We welcome suggestions and comments from parents, and we aim to deal properly, within a reasonable time and in a courteous, efficient and fair way with any complaints parents may raise.
- 1.2. Wherever possible, the School seeks to resolve complaints in a timely manner through an informal process, resorting to a formal process only where informal means have not been successful.
- 1.3. The School will make this policy available to parents of current pupils on the school website and in hard copy from the School Office, free of charge. On request, details of the Parental Complaints Policy and the number of complaints registered under the formal procedure during the preceding school year will be provided to the Chief Inspector, the Secretary of State or an independent inspectorate.
- 1.4. The School believes and works on the basis that, in the interests of everyone involved, parental complaints are almost always best dealt with in a timely manner and through an informal process not least because in most cases, families and the School will need to continue to work together. Accordingly, as a general principle, the School will usually seek to address all parental complaints informally in the first instance but will take into account any parental representations in this regard. However, the School will determine the appropriate level at which a parental complaint or concern will be considered and reserves the right to escalate a complaint to a higher level, or consider a complaint at a lower level, if appropriate.
- 1.5. As a guide, a complaint may be treated as a formal complaint, under Stage 2 of the complaints procedure, without going through the informal process first, if the School considers that the complaint contains allegations that are serious and/or complex and/or are against senior members of staff and/or if the School considers that the nature of the complaint otherwise warrants a formal investigation from the outset.

2. SCOPE (what constitutes a complaint)

- 2.1. A complaint, for the purpose of this policy, is an expression of dissatisfaction with a real or perceived problem, any matter about which a parent of a pupil is unhappy and seeks action by the school. A complaint may be about a member of staff, a department, a service provided (e.g. catering, cleaning etc) or the School as a whole, relating to any aspects of the School or the provision of facilities or services.
- 2.2. This Parental Complaints Policy has been created to deal with any complaint that does not fall under one of St Faith's other Policies as set out below.
- The Admissions Policy for complaints regarding Admissions.
 - The Pastoral, Behaviour and Discipline Policy and the Anti-Bullying Policy for the handling of Disciplinary and/or Bullying issues.
 - Any Safeguarding or child protection concerns, which will be dealt with under our Safeguarding and Child Protection Policy.
 - Any formal complaints received in relation to data protection concerns would not normally be dealt with under this procedure but should instead be dealt with through the school's Data Protection and relevant Privacy policies.
- 2.3. The relevant policies mentioned above are accessible to parents on the school's [website](#) or can be provided upon request, at no charge.
- 2.4. St Faith's makes its Complaints Policy available to all parents of pupils on the School's website www.stfaiths.co.uk and in the School office during the school day. The School will ensure that parents of pupils who request it are made aware that this document is published or available and of the form in which it is published or available¹.
- 2.5. This Parental Complaints Policy applies to parents of current pupils and parents of past pupils if the complaint was initially raised when the pupil was still registered at the School. All references to 'parents' means the holder(s) of parental responsibility for a pupil about whom the complaint relates and includes guardians and carers.
- 2.6. To enable effective review, the School expects complaints to be raised within 90 calendar days of an issue first arising; complaints outside this timeline will be referred to the Chair of St Faith's Local Governing Body who, acting reasonably, will determine how the School will proceed.
- 2.7. Parents are therefore expected to proceed with their complaint in a timely and reasonable manner. Depending upon the circumstances, the School may, acting reasonably, treat a complaint as closed if a parent has not proceeded within the relevant timeframes.
- 2.8. 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 of 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.

3. POLICY AIMS

¹ In accordance with Paragraph 32(1)(b) of Schedule 1 to the Education (Independent School Standards) Regulations 2014.

3.1. We wish to ensure that:

- Parents who wish to make a complaint know how to do so, initially on an informal basis and, if necessary, through a formal procedure;
- We respond to such complaints in a courteous and efficient way;
- All complaints are managed in the timescales set out in this policy and where this is not possible, such as where a complaint is received during a school holiday (which may cause a delay in collecting information, for example, owing to staff absence), the timescales as set out in the policy may be extended;
- Parents understand that we listen and take complaints seriously and confidentially; and
- We take action where appropriate;

3.2. If a parent is not satisfied with the response to a formal written complaint, there is a procedure that they can follow and provision for them to attend a meeting with a Complaints Panel.

3.3. The Policy operates on the basis of the statements below.

4. SAFEGUARDING STATEMENT

4.1. St Faith's is committed to maintaining a safe and secure environment for all pupils and a 'culture of vigilance' to safeguard and protect all in its care, and in its application of all aspects of its 'Safeguarding and Child Protection Policy'.

5. EQUAL OPPORTUNITIES STATEMENT

5.1. The School is committed to treating everyone as equal irrespective of their religion or belief, race, sex, sexual orientation, gender reassignment, disability, marriage and civil partnership and pregnancy and maternity status, or age. Equally these characteristics will be recognised and respected, and the School will inculcate a positive culture of tolerance, equality and mutual respect.

6. DATA PROTECTION

6.1. The School processes data in accordance with its Privacy Notices (available on the School website), and its Data Protection and Information Security policies. When dealing with complaints the School (including any panel members, internal or external, appointed under the Stage 3 procedure) may process a range of information, which may include, but is not necessarily limited to, the following:

- Date when the issue was raised and other dates relating to the complaint or investigation;
- Names of pupils, parents and any other individuals involved;
- Description of the issue;
- Records of all investigations (if appropriate);
- Witness statements (if appropriate);
- Name and contact details of members of staff handling the issue at each stage and any other staff who were made aware/involved;
- Copies of correspondence on the issue (including emails, other written correspondence and records of phone conversations);
- Notes/minutes of the Hearing; and/or
- The Panel's written decision, where applicable.

6.2. Records may include special category personal data (as further detailed in the School's Data Protection Policy and Privacy Notices), such as information relating to physical or mental health, where this is necessary owing to the nature of the complaint.

- 6.3. Records of individual complaints will be retained for a minimum of seven years and only as long as is considered necessary in the circumstances. If a complaint is relating to an allegation of abuse, the record should be retained for the term recommended by the Independent inquiry into Child Sexual Abuse (75 years) and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

7. COMPLAINT ABOUT THE SCHOOL'S DATA PROTECTION

- 7.1. Under the UK General Data Protection Regulation (UK GDPR), individuals have the right to lodge a complaint if they feel that the School has infringed the UK GDPR when processing their personal data. Your first point of contact at the School would be the School's Compliance Department, who you can email at hfox@stfaiths.co.uk. The School will then do their best to rectify the matter. If you are still not satisfied with the way the matter has been dealt with, you also have a right under the UK GDPR to lodge a complaint with the Information Commissioners Office (ICO). You can report a concern to the ICO by calling their helpline on 0303 123 1113. The ICO shall inform you of the progress and outcome of your complaint. Please see <https://ico.org.uk/make-a-complaint/> for more information.
- 7.2. Complaints to the Independent School's Inspectorate (ISI). Parents may also contact the ISI office confidentially if they wish to raise concerns about the School's handling of their complaint. ISI may be contacted by telephone on 0207 6000 100, by email at concerns@isi.net or at ISI, Ground Floor, C A P House, 9-12 Long Lane, London, EC1A 9HA.

8. TIMESCALES

- 8.1. Unless there are exceptional circumstances and in the interests of a prompt resolution and a full and fair investigation, initial complaints must be raised within three calendar months of an issue first arising. A complaint raised outside of this timeframe should therefore include details of the reason(s) for any such delay and it will be at the School's discretion as to whether to accept the complaint or not.
- 8.2. When we refer to working days, we mean Monday to Friday when the School is open during term time, excluding bank holidays. The School's term dates are published on the School's website. Accordingly, complaints that are raised in the school holidays will usually be deemed to have been received on the first working day after receipt. Complaints continuing to progress during School holidays may take longer to resolve due to the non-availability of relevant staff. The School will take reasonable steps to limit any such delay where practicable.
- 8.3. In complex cases, or due to significant disruption to School life or unavoidable staff absence, it may also take longer to resolve a complaint. For example, the School may require more time to conduct a full and fair investigation and/or convene a panel. The School will take all reasonable steps to limit any such delay. If there are exceptional circumstances resulting in a delay to the timescales for a stage of the complaints procedure, the School will notify the parent(s) and inform them of new timescales as soon as possible.
- 8.4. It may be necessary to delay or suspend an investigation where external agencies are involved, such as the police, the Teaching Regulation Agency, the Independent Schools Inspectorate (ISI) and/or where parents begin legal action against the School in relation to the complaint. The Head or Chair of St Faith's Local Governing Body, as applicable, will consider whether or not to suspend the complaints procedure until the legal proceedings, or other statutory agencies' involvement, have been concluded. In doing

so, the Head or Chair of St Faith's Committee of Governors, as applicable, will take into account advice from appropriate external agencies, and its legal advisers, where applicable.

9. CONFLICTS OF INTEREST

- 9.1. In the event that a conflict of interest exists in relation to a complaint, then the member of staff or Governor(s) who has/have the potential conflict of interest ('the conflicted party/parties') cannot be involved in the complaints procedure and their place in the complaints process (if any) will be taken by another member of staff nominated by the Head, or another Governor (as appropriate).
- 9.2. If the conflicted party is the Head, the complaint will be dealt with by a Governor nominated by the Chair of St Faith's Local Governing Body.
- 9.3. A conflict of interest can arise in a number of ways, including the following by way of example:
- The individual making the complaint is also a member of staff or a Governor;
 - The individual making the complaint is related to or has a close personal relationship with a member of staff or Governor; or
 - The subject of the complaint is related to or has a close personal relationship with a member of staff or Governor.

10. MANAGEMENT OF COMPLAINTS

10.1.1. Stage 1: Informal Resolution

- 10.1.1 Talking directly to the appropriate member of staff, or by emailing them is the right action to take first and most complaints are resolved quickly and informally this way. Be as clear as possible about your complaint and what you seek to be done about it so that this can be considered.
- 10.1.2 The School will usually acknowledge the complaint by telephone, email or letter **within two working days**, indicating the immediate action that is being taken and the likely timescales for response or resolution. If possible, a resolution will be reached at this stage.
- 10.1.3 The best person to approach is your child's tutor. The tutor will make a written record of your

complaint and the date on which it was raised. If time is required for investigation and response, we will aim for this to occur **within 14 working days**.

10.1.4 If for whatever reason you feel that the tutor is not the right person to talk to you may wish to speak, as appropriate, to one of the following:

- The appropriate Head of Department (ask in the School Office for the name if you do not know it). Complaints raised with a Head of Department will usually then be referred to the relevant teacher.
- The Head of Pre Prep, Mrs Wakefield (for general education and pastoral issues in the Pre Prep).
- The Director of Pastoral Care, Mr Critchley, or the Head of House (for general welfare and pastoral issues in Years 3-8).
- The Head or the Deputy Head, Mr Davenport, (for concerns about your child's next school).
- The Deputy Head (Academic), Mrs Davies (for complaints about your child's curriculum, overall academic progress or teaching group in Years 3 to 8).

10.1.5 If you fail to reach a resolution that satisfies you or if no resolution is reached after **14 working days** you should make your complaint formally to the Head as in the next section: Formal Resolution.

10.2. **Stage 2: Formal Resolution.**

10.2.1. If your concern has not been resolved on an informal basis then you should put your concern in writing to the Head. In this communication, you should state clearly that you are raising a formal complaint. You should also detail the outcome sought. The Head will consider your complaint and decide on the appropriate course of action to take.

10.2.2. In most cases, the Head will speak to or meet the parents concerned, **within 14 working days** of receiving the complaint, to discuss the matter. If possible, a resolution will be reached at this stage. Meetings at this stage would normally be between the Head and the parents.

10.2.3. It may be necessary for the Head to either carry out or delegate the carrying out of further investigations. The Head will keep written records of all meetings and interviews held in relation to the concern.

10.2.4. Once the Head is satisfied, as far as is practicable, that all of the relevant facts have been established, a decision will be made and the parents will be informed by email or letter of this decision in writing and the reasons for it **within 28 working days** from the receipt of the formal complaint.

10.2.5. If parents cannot accept this decision or remain dissatisfied, they should refer the matter to the Panel within **14 working days** of receipt of the date of the letter or email from the Head detailing the outcome of the formal complaint, as detailed in the next section.

10.3. **Stage 3: Panel Hearing.**

10.3.1. If there is a failure to reach a resolution of your complaint through informal means or with the involvement of the Head through the formal process, you should address your complaint in writing to the Chair of the St Faith's Local Governing Body, care of St Faith's, Cambridge, CB2

8AG. This will normally only be considered if all other stages of the complaint procedure have been completed.

- 10.3.2.** The School will forward your letter to the Chair. The complaint will then be referred to a Panel for consideration. The Panel will consist of at least three persons not directly involved in the matters detailed in the complaint, two of whom will be Governors nominated by the Chair of the St Faith's Local Governing Body and the third of whom will be independent of the management and running of the school. However, where the complaint is about the governance of the School the Panel will consist of at least three persons who are independent of the management and the governance of the School. Each of the Panel members will be appointed by the Governors of the school. The Chair of the St Faith's Local Governing Body will then acknowledge the complaint and schedule a hearing to take place as soon as reasonably practicable within **28 working days** of receipt of the letter.
- 10.3.3. The Panel will consider the merits of the complaint and all facts that they consider relevant. The Panel will not normally consider new allegations that have not been raised at an earlier stage however, the Chair of the St Faith's Local Governing Body and/or the Panel shall have discretion to permit evidence if relevant to the matters to be considered.
- 10.3.4. 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 will be supplied to all parties **not later than seven days** prior to the hearing.
- 10.3.5. The parents may be accompanied to the hearing by one person. Legal representation is not encouraged as the procedure is designed to be an internal procedure that is not overly formal or legalistic. Parties should be at ease to be able to have free and frank discussions about the issues under discussion.
- 10.3.6. If possible, the Panel will resolve the parents' complaint immediately without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out.
- 10.3.7. The remit of the Panel and the manner in which the hearing is conducted shall be at the discretion of the Panel.

10.4. Panel Findings.

- 10.4.1. After due consideration of the merits of the complaint and all facts the Panel consider relevant, the Panel will make findings as to whether or not the Stage 2 decision was a reasonable one and decide whether to:
- dismiss the complaint(s) in whole or in part;
 - uphold the complaint(s) in whole or in part; and
 - make recommendations.
- 10.4.2. The Panel will write to or email the parents, **within 14 working days** of the hearing, informing them of its findings and the reasons for its decision.
- 10.4.3. The Panel's findings and its decision and its recommendations, if any, will be communicated in writing or by email to the parents, to the Head, to the Governors and, where relevant, to the person about whom the complaint has been raised. The Panel's decision will be final.

- 10.4.4. A copy of the Panel's findings and recommendations will be made available for inspection on the school premises by the Chair of Governors and the Head.
- 10.4.5. A written record of all complaints will be maintained and will record whether they were resolved at the preliminary stage or proceeded to a panel hearing. The record will include (as appropriate and subject to compliance with GDPR and confidentiality obligations) action taken by the School as a result of these complaints, regardless of whether they are upheld.
- 10.4.6. Parents can be assured that all concerns and complaints will be treated seriously and confidentially. Correspondence, statements and records will be kept confidential except where the Secretary of State or a body conducting an inspection under section 108 or 109 of the Education and Skills Act 2008 Act requests access to them.

10.5. **Persistent Correspondence.**

- 10.5.1. Where repeated attempts are made by a parent to raise the same complaint after it has been considered at all three stages, this may be regarded by the School as vexatious and outside the scope of this policy and treated accordingly.
- 10.5.2. It is the School's intention to deal with concerns raised under this policy fairly, and work with parents constructively, towards resolving concerns.
- 10.5.3. As concerns and complaints will be dealt with confidentially and often relate to children, and may often involve the legal rights of third parties such as staff and other pupils, complaints should not be discussed publicly, including via social media.
- 10.5.4. Whilst the School will not normally limit the contact complainants have with the School, or dismiss a complaint as unreasonable, the circumstances in which the School may do so are set out in Appendix 1 of this Policy. Appendix 1 is based on the Department for Education's 'Best practice guidance for school complaints procedures' (2020, reviewed 2021).

10.6. **Parents of Children in the Early Years Foundation Stage (EYFS) Pre School and Reception Years.**

- 10.6.1. Parents of EYFS children should follow the three stages of this Complaints Procedure. Where children are in our Pre School and Reception Years, we will investigate all written complaints relating to the requirements and notify complainants of the outcome of the investigation **within 28 days** of having received the complaint.
- 10.6.2. If parents remain dissatisfied and their complaint is about the School's fulfilment of the EYFS requirements, then parents may take their complaint to Ofsted. Parents may complain directly to Ofsted if they believe the provider is not meeting the EYFS requirements.
- 10.6.3. Parents of children in the Pre School and Reception Years may make their complaints known to Ofsted if they wish to do so.
- 10.6.4. Contact details for the relevant organisations are:

Ofsted
Piccadilly Gate
Store Street
Manchester
M1 2WD

ISI
CAP House
9-12 Long Lane
London
EC1A 9HA

General helpline 0300 123 1231
Textphone number 0161 6188524 or
Enquiries@ofsted.gov.uk

020 7600 0100 or
Concerns@isi.net

10.7. **Records of Complaints.**

- 10.7.1. The Independent Schools Standards Regulations require the School to publish the number of complaints registered under the formal complaints procedure during the preceding school year. In the academic year 2024/25, the number of formal complaints was 6.
- 10.7.2. The School recognises the value of recording even concerns resolved informally, to allow patterns to be identified and monitored. The member of staff dealing with the concern will, with reference to the nature of the complaint, use their professional judgment to determine whether a matter resolved informally should be recorded on the School's Complaints Log.
- 10.7.3. Correspondence, statements and records relating to individual complaints will be kept confidential except where access is requested by the Secretary of State or where disclosure is required by a body conducting an inspection under section 109 of the Education and Skills Act 2008 or under other legal authority or court order.
- 10.7.4. If the investigation of a parental concern leads to action having to be taken under staff or pupil disciplinary procedures, such action is handled confidentially within the School and parents are not entitled to details of any such procedures or related sanctions imposed other than to know that internal procedures are being followed.
- 10.7.5. We will provide ISI/Ofsted, on request, with a written record of all complaints made during any specified period, and the action which was taken as a result of each complaint.
- 10.7.6. A record of complaints is kept for the length of time as set out in 6.3.

10.8. **Reporting Unsatisfactory Outcomes.**

- 10.8.1. If, after all stages of the above complaints procedures are exhausted, and the outcome reached is still considered by the Parents to be unsatisfactory, Parents may wish to make their concerns known to ISI and they can be contacted on 020 7600 0100 or by email mail to: concerns@isi.net.
- 10.8.2. The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 require the School to provide you on conclusion of the final stage of the School's Complaints Procedure with the name and address of an alternative dispute resolution provider who has been certified by the Chartered Trading Standards Institute as competent to resolve consumer disputes. These details are set out below for the Centre for Effective Dispute Resolution (CEDR). However, please note that the School is not obliged to enter into alternative dispute resolution through CEDR, and nor is it willing to do so in most instances.

The Centre for Effective Dispute Resolution, "CEDR"
100 St. Paul's Churchyard,
London EC4M 8BU
United Kingdom

C Hyde-Dunn
Head

Appendix 1 Persistent and unreasonable complaints

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, harassing or threatening.
2. The School, in line with the Department for Education, defines unreasonable complaints as those which, because of the frequency or nature of the complainant's contact with the School, hinders the School's consideration of their complaint.
3. A non-exhaustive list of behaviours which the School may judge as unreasonable include the complainant:
 - refusing to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
 - refusing to co-operate with the complaints investigation process
 - refusing to accept that certain issues are not within the scope of the complaints procedure
 - insisting on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice
 - introducing trivial or irrelevant information which they expect to be taken into account and commented on raising large numbers of detailed but unimportant questions, and insisting they are fully answered, often immediately and to their own timescales
 - making unjustified complaints about staff who are trying to deal with the issues, and seeking to have them replaced
 - changing the basis of the complaint as the investigation proceeds
 - repeatedly making the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
 - refusing to accept the findings of the investigation into that complaint where the School's complaint procedure has been fully and properly implemented and completed
 - seeking an unrealistic outcome
 - making excessive demands on school time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with
 - using threats, intimidation or violence
 - harassing staff
 - using abusive, offensive or discriminatory language
 - knowingly providing falsified information or knowingly making a false complaint
 - publishing unacceptable information on social media or other public forums.
4. Complainants should try to reasonably limit their communication 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.
5. Whenever possible, the Head will discuss any concerns with the complainant informally before dismissing a complaint as 'unreasonable'. This will usually be in consultation with the Chair of The St Faiths Local Governing Body.
6. If the behaviour continues, the School will write to the complainant explaining that their behaviour

is unreasonable and ask 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 be reviewed after three months.

7. In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from the School.
8. If a complaint is dismissed as 'unreasonable', the complainant may submit a written request for the Chair of The St Faith's Local Governing Body, or a Governor nominated by them, to consider, solely, whether the School's dismissal of their complaint was justified. Any such request must be made by the complainant within 10 working days of the communication of the decision to dismiss their complaint and be addressed to the Clerk to the Governors. The complainant must set out the grounds for their request.
9. The Chair of The St Faith's Local Governing Body, or their nominee, will consider any such requests, under Clause 8 of this Appendix, on written evidence only and will usually provide the outcome to parents within 15 working days.