

## **Complaints Policy and Procedure**

### **Aims**

The Complaints Policy applies to all parents and students (complainants) at Invictus International School.

Invictus International School welcomes suggestions and comments from complainants, and takes seriously complaints and concerns that they may raise. This document will show complainants how to use our complaints system.

A complaint will be treated as an expression of genuine dissatisfaction, which needs a response. We wish to make sure that:

- parents/students wishing to make a complaint know how to do so.
- we respond to complaints within a reasonable time and in a courteous and efficient way.
- complainants realise that we listen and take complaints seriously.
- we take action where appropriate.

### **‘How should I complain?’**

Complainants can talk directly to any member of staff, write, email or telephone the school via channels published in the Student Handbook available on our website.

Complainants are urged to be as clear as possible about what the complaint is about. Any member of staff will be happy to help. It may be best to start with the person most closely concerned with the issue –such as the homeroom teacher, or to raise concerns over sport or games with the subject leader for PE. They may be able to sort things out quickly, with the minimum of fuss. However, if the matter is not dealt with to the complainant’s satisfaction the matter can be taken to a more senior member of staff, for example the Head of Department or a member of the School Leadership Team (SLT) or the Principal. In such instances, you are strongly encouraged to complete and submit the complaints form attached to this policy (FRM101).

### **‘I don’t want to complain as such, but there is something bothering me’.**

The school is here for parents and students, and their views and ideas are meant to be heard. Contact a member of staff, as described above.

### **‘I am not sure whether to complain or not’.**

Parents and students are entitled to express their concerns. If in doubt, please contact the school for help.

### **Procedures should be as speedy as possible – consistent with fairness to all concerned**

Each stage of the procedure has specified time limits. Where it is not possible to meet these, information about progress must be given to the complainant. Care should be taken not to drag things out with unnecessary bureaucracy.

We will attempt to address a concern within three working days and for major complaints by the end of 14 working days. This can take longer depending upon the nature and level of enquiry.

### **Support for a person complained against**

Member of staff who may be questioned as part of a complaints procedure investigation must feel they are being treated in a fair way and that they too will have an opportunity to put their case. They should be told about the procedure and be kept informed of progress. There is a crucial balance to be maintained between supporting the member of staff so that his/her rights and reputation is protected and investigating a complaint thoroughly and impartially.

The complaints procedure is distinct from formal disciplinary proceedings for staff and this must be made clear to all concerned. There may be occasions where a complaint launches a disciplinary procedure which puts the complaints procedure on hold. If so, the complainant should be informed of this and any non- disciplinary aspects of the complaint should be dealt with by the usual complaints procedures; the complainant should be updated every 17 working days on the likely further delay. It may be clear after the disciplinary procedures have been completed, that particular responses to the complainant are required (e.g. an apology or an explanation of new policies to avoid a similar problem again).

### **'What happens about confidentiality?'**

The complaint or concern will be treated in a confidential manner and with respect. Knowledge of it will be limited to the SLT or the Principal and those directly involved. The Sing-Ed Global Schoolhouse (SEGSB Board) may also need to be informed. It is the school's policy that complaints made by parents/students should not rebound adversely on the students.

The school cannot entirely rule out the need to make third parties outside the school aware of the complaint and possibly also the identity of those involved. This would only be likely to happen very rarely where, for example, a child's safety was at risk or it became necessary to refer matters to the police. Complainants would be fully informed if this were to be the case.

While information relating to specific complaints will be kept confidentially on file, anonymous complaints may not be pursued.

Action, which needed to be taken under staff disciplinary procedures as a result of complaints, would be handled confidentially within the school.

### **Redress**

If the outcome of the complaint procedure shows the school is at fault, it is often sufficient to provide redress in the form of an acknowledgement that the complaint is valid. Alternatively, it may be appropriate to offer one or more of an apology, an explanation, a promise that the event complained of will not recur, an undertaking to review school policies or practices in the light of the complaint, or, in appropriate circumstances, financial compensation. Fear of litigation should not prevent the school from admitting to parents when mistakes have been made, but the Board should be made aware of the situation.

### **Staff awareness and training**

School staff, including non-teaching staff, should be familiar with the procedures so that they can advise parents. All school staff should have clear information about which staff have which responsibilities at school so that parents do not get continually passed from one to another.

### **Record keeping**

If complaints are to contribute to raising the quality of education, then they need to be recorded and monitored termly by the SLT. Invictus International School is committed to doing so.

Recording should begin at the point when a concern or initial complaint has become the kind of complaint that cannot be resolved on the spot but needs investigation and/or consultation with others in the school and will require a later report back (either orally or in writing) to the complainant.

Recording at the earliest stages need only be a very basic record of the complaint, giving the date, name of parent and general nature of the complaint.

These are the various stages in the complaints procedure:

### **Stage 1: Directed to Staff**

- 1.1 The vast majority of concerns and complaints can be resolved informally. There are many occasions where concerns are resolved straight away through the Homeroom Teacher/Subject Teacher or depending on whom the complainants first approached.
- 1.2 Complainants must feel able to raise concerns with members of staff without any formality, either in person, by telephone, by e-mail or in writing (not via social media). On occasion it may be appropriate for someone to act on behalf of a parent.
- 1.3 At first it may be unclear whether a parent/student is asking a question or expressing an opinion rather than making a complaint. A parent/student may want a preliminary discussion about an issue to help decide whether he or she wishes to take it further.

### **Procedure:**

- 1.a Complainants have an opportunity for discussion of their concern with the appropriate member of staff who clarifies with the complainant the nature of the concern reassuring them that the school wants to hear about it. The member of staff may explain to the complainant how the situation happened. It can be helpful to identify at this point what sort of outcome the complainant is looking for.
- 1.b If the member of staff first contacted cannot immediately deal with the matter, he/she makes a clear note of the date, name, contact address (email address) or phone number of the complainant.
- 1.c Any member of staff will know how to refer, if necessary, to the person with responsibility for the particular issue raised by the complainant. She/he will check later to make sure the referral has been successful. At this point, the member of staff can seek advice from the SLT if deemed necessary.
- 1.d On certain major issues, the SLT may decide to deal with concerns directly at this stage (escalation to Stage 2).
- 1.e If the concern relates to the Principal, the complainant is advised to contact the Head of School. He/she can be contacted through email (email address available from school office).

- 1.f The member of staff dealing with the concern makes sure that the complainant is clear what action (if any) or monitoring of the situation has been agreed, putting this in writing only if this seems the best way of making things clear.

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- 1.g Where no satisfactory solution has been found **within 17 days** (staff responds within 3 days and resolves the complaint in the next 14 days), parents are asked if they wish their concern to be considered further. If so they are given clear information, both orally and in writing about how to proceed and about any independent advice available to them.

## **Stage 2: Referral/Directed To SLT**

- 2.1 At this stage it has become clear that the concern is a definite complaint. In some cases the SLT has already been involved in looking at matters; in others it is their first involvement. In either case, it is helpful for the SLT to use guidelines to ensure consistency among cases, and to make sure that nothing happens at this stage which could make it difficult for later stages to proceed smoothly.
- 2.2 As the SLT is responsible for the day-to-day running of the school, they have responsibility for the implementation of a complaints system, including the decisions about their own involvement at various stages. One of the reasons for having various 'stages' in a complaints procedure is to reassure complainants that their grievance is being heard by more than one person. The SLT may involve staff who were dealing with the complaint at Stage 1 as required.

### **Procedure:**

- 2.a The SLT acknowledges the complaint orally or in writing **within 3 working days** of receiving the written complaint. The acknowledgement gives a brief explanation of the school's complaint procedure and a target date for providing a response to the complaint. This should normally be **within 14 working days**; if this proves impossible, a letter is sent explaining the reason for the delay and giving a revised target date.
- 2.b The SLT provides an opportunity for the complainant to meet to supplement any information provided previously. It is made clear to the complainant that if she/he wishes, she/he may be accompanied to any meeting by a friend, relative, representative, or advocate who can speak on the complainant's behalf; and that interpreting facilities are available if needed.

- 2.c If necessary, the SLT should interview witnesses and take statements from those involved. If the complaint centres around a student or students, the student(s) should also be interviewed. Students would normally be interviewed with parents/guardians present. In some situations, circumstances may prevent this e.g. where this would seriously delay the investigation of a serious/urgent complaint or where particular circumstances mean that a student has specifically said that they would prefer that parents or guardians were not involved. In such circumstances another member of staff with whom the student feels comfortable should be asked to attend. If a member of staff is complained against, the needs of that person should be borne in mind.
- 2.d The SLT keeps written records of meetings, telephone conversations and other documentation.
- 2.e Once all the relevant facts have been established, the SLT should then produce a written response to the complainant, or may wish to meet the complainant to discuss/resolve the matter directly.
- 2.f A written response includes a full explanation of the decision and the reasons for it. Where appropriate, this includes what action the school will take to resolve the complaint. The complainant is advised that should he/she wishes to take the complaint further, he/she should notify the Head of School **within 14 working days** of receiving the outcome letter.
- 2.g If a complaint is against the action of the SLT, or if they have been very closely involved at Stage 1, the Head of School should carry out all the Stage 2 procedures.

### **Stage 3: Escalated to Complaints Committee**

#### **‘What if I am not satisfied with the outcome?’**

- 3.1 Complaints rarely reach this formal level, but it is important that the Complaints Committee (the Committee) is prepared to deal with them when necessary.
- 3.2 It is important that this review not only be independent and impartial but that it be seen as so. Therefore, members of the Committee will be adjusted to ensure no conflicts of interest.
- 3.3 Many complaints are inevitably seen by complainants as being ‘against’ a particular member of staff and their actions. However, all complaints which reach this stage will have done so because the complainant has not been satisfied by the response from the SLT at an earlier stage of the procedure, and it may be

appropriate for the Committee to consider that the complaint is against the school rather than against the member of staff whose actions led to the original complaint.

## **Procedure**

- 3.a The complainant shall submit FRM 101 (as attached) to the Principal (unless the complaint is against the Principal), for the complaint to proceed to Stage 3. The complainant should include in FRM 101 a full written statement of the claim and details of any witnesses he/she wishes to attend the meeting with the Committee (the Meeting). Following the receipt of FRM 101, a confirmation of receipt shall be issued by the Principal and the procedures set out below will be followed.
  
- 3.b The Principal will convene the Complaints Committee, identifying the Chairperson, in accordance with the following requirements:
  - 3.b.1 The Committee shall consist of three people including not less than one independent member with the remainder consisting of one or two Board members nominated from members of SEGSH.
  - 3.b.2 In convening the Committee, the Chairperson shall be sensitive to issues of race, gender and religious affiliation.
  - 3.b.3 The Board members nominated to the Committee shall have had no prior involvement with the complaint.
  - 3.b.4 The independent member(s) will be selected along the guidelines issued by SEGSH. This means suitable people will be those who have held positions of responsibility and who are used to analysing evidence and putting forward balanced arguments/points. It would add standing if this person had some standing in the local community. In this connection serving or retired business people, heads or senior members of staff at other schools and people with a legal background may be considered suitable.
  - 3.b.5 The Committee will ensure that minutes are kept of all its proceedings.
  - 3.b.6 In the event that a member of the Committee becomes ill or is otherwise incapable of continuing to serve on the Committee then the Committee will be entitled to co-opt another Board member or independent member (as may be required).



- 3.c The Chairperson will write to the complainant (with a copy to the Principal) to acknowledge receipt of FRM 101 ('The Acknowledgement'). The Acknowledgement shall inform the complainant that:
  - 3.c.1 The complaint is to be heard by a Committee constituted in accordance with (Clause 3.b) of this procedure.
  - 3.c.2 All documents on which the complainant wishes to rely at the Meeting to hear the complaint must be submitted to the Chairperson **within 3 working days** after receipt of FRM 101.
  
- 3.d The Chairperson shall submit to the Committee members and to SLT copies of the complainant's FRM 101 and all supporting documents without delay after receipt. SLT shall be invited by the Chairperson to submit a written report to the Panel in response to the complainant's FRM 101. SLT may invite members of staff directly involved in matters raised by the complainant to respond in writing to the complaint set out in FRM 101.
  
- 3.e If the complainant's FRM 101 contains matters that have not been raised previously or which sets out a claim that is substantially different to that which was investigated under Stage 1 or Stage 2 of this complaints procedure then the SLT can request that the Stage 2 procedure be repeated. In those circumstances the Stage 3 procedure will be suspended until the repeated stage 2 procedure has been concluded. In the event that there is a dispute as to whether the stage 2 procedure should be repeated the Chairperson's decision shall be final.
  
- 3.f As soon as possible after FRM 101 has been received by the Chairperson, the Chairperson will write and inform the complainant, SLT and members of the Committee at least 7 working days in advance of the date, time and place of the Meeting and the manner in which it is to be conducted. This letter will also notify the parties of the matters set out below in (Clause 3.g).
  
- 3.g The following rules shall apply to the Meeting:
  - 3.g.1 The complainant has the right to be accompanied to the Meeting by a friend/interpreter whose identity must be notified to the Chairperson not less than 3 working days before the Meeting.
  - 3.g.2 The Principal must notify the Chairperson not less than 3 working days before the Meeting of the identity of anyone who will be attending the Meeting at his/her request. This can include members of staff directly involved in matters raised by the complainant.



- 3.g.3 No further documentary evidence can be submitted by the complainant later than 3 working days before the Meeting.
- 3.g.4 The Principal's report and any supporting documentation shall be submitted to the Chairperson not later than 3 working days before the Meeting.
- 3.g.5 The Chairperson shall supply copies of any further documents submitted by the complainant, the Principal's report and any supporting documentation to the Committee as soon as the same are received. The Chairperson will also notify the Committee, the complainant and the Principal of the identity of everyone attending the meeting.
- 3.h If the Committee decides that it wishes to hear from any witnesses at the Meeting it shall inform the Chairperson who shall notify such witnesses of the date, time and place of the Meeting and request them to attend.
- 3.i The Meeting will be conducted in two parts. In the first part, The Committee will first hear from the complainant. Only the complainant, any witnesses/representative notified will attend. In the second part, the Committee will then hear from the Principal and any persons notified. The two parts of the Meeting will be held separately and in private.
- 3.j At the Meeting, the Committee shall be free to question the complainant, the Principal, any staff in attendance and any witnesses requested by the Committee.
- 3.k The Committee shall issue a report of findings and recommendations within 21 days upon acknowledgement of receipt of FRM 101. The report will be sent to the Chairperson who shall send it to the Principal, the complainant and the SEGSH Board. The report will either be a final report or an interim report. A copy of this report will be available for inspection on the school premises. The Committee will issue an interim report where it considers that it requires additional documentation or additional witness evidence to enable it to reach a final conclusion.

The interim report will confirm what more the Committee requires and any additional documentation requested in the interim report shall be supplied to the Chairperson within 3 working days after receipt of the interim report by the party called upon to produce additional documentation.

In the event that the Committee wishes to hear from further witnesses it shall arrange to do so as soon as practicable.

- 3.l In the event that an interim report has been issued under (Clause 3.k), the Committee will issue its final report within 7 working days after the additional documentation requested has been submitted to it or after the Panel have interviewed the further witnesses (as the case may be).
- 3.m The role of the Committee is to determine issues of fact.
- 3.n The final report of the Committee will be considered by the Board, which will agree a response which will be notified to the complainant and the Principal within 7 days after the date on which the final report was issued. A copy of the Panel's findings and recommendations will be sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about and be available for inspection on the School premises by the proprietor and the SLT.
- 3.o In the event that the time limits set out in this [Clause 3] cannot be complied with due to the absence of the Principal or the complainant or for any other reason beyond the parties' control, the Chairperson shall seek to agree a revised timetable with the parties to procure the conclusion of Stage 3 of the complaint as quickly as is reasonably possible.
- 3.p All correspondence, statements and records relating to individual complaints are to be kept confidential except where local legal requirements permit access.
- 3.q The school endeavours to satisfy all complaints. Otherwise, complainants may wish to seek to resolve the matter through the CPE Student Services Centre, using the Dispute Resolution Scheme of the Committee for Private Education, which is described on the CPE website. This dispute resolution scheme may, where appropriate, involve the Singapore Mediation Centre (SMC) or Singapore Institute of Arbitrators (SI Arb) as the mediation centres.

Most importantly though, the school recognises and acknowledges the entitlement to complain and we hope to work with parents in the best interests of the children and young people in our care.

**Prepared by Dr Nicholas Duggan**

**Implementation date: January 2022**

**Review date: January 2023**

**FRM 101: Formal Complaint to Invictus’s Complaints Committee (Via School Principal)**

Name of Student:	
Name of *Parents/Guardians:	
Email:	
Contact Number:	
Details of Complaint (Please include dates):	
<p>I/We, *parent(s)/guardian, for the above named student, request(s) that a committee of the Sing-Ed Global Schoolhouse Board carries out a review of a formal complaint. I/We understand the referral procedure outlined in the Complaints Policy and Procedure and we agree to abide by its terms. I/We also agree that the proceedings are and will remain confidential and that this review will be final subject to any legal rights that may exist. The grounds upon which we ask for a review and the matters which we wish to discuss are set out as above. I/We understand that we may be accompanied at the meeting with the committee. We also understand that that person attends only to provide support and not to act as a representative.</p>	
Full name:	Signature:
Preferred Method of Contact Details:	
Relationship to student:	
Date:	

\*Please delete accordingly.