

<b>COMPLAINTS POLICY &amp; PROCEDURES</b>			
<b>DCI Policy Code</b>	-	<b>Applicable To</b>	<b>Whole College</b>
<b>DCI Policy Area</b>	-	<b>Approval By</b>	<b>DCSPD CLT</b>
<b>Responsibility (DCI)</b>	-	<b>Last Review Date</b>	<b>February 2021</b>
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DULWICH COLLEGE SHANGHAI PUDONG

Complaints

Whole College

STAGE 4: Complaint In Writing Addressed To And Reviewed By The Director of Schools

Formal Complaint Form

### **Policy Statement (1): Introduction & Rationale**

The College aims to:

- 1) encourage the resolution of problems by informal means wherever possible;
- 2) ensure that concerns are dealt with quickly, fully and fairly and within clearly defined time limits;
- 3) provide effective responses and appropriate redress;
- 4) maintain good working relationships between all people involved with the College.

The College recognises a distinction between a ‘concern’ and a ‘complaint’. Concerns may be raised regularly with a respective School on an ad hoc and informal basis, and we endeavor to resolve or answer each one satisfactorily. A complaint is understood to be more serious, raised in a more specific manner, and may be considered as “any matter about which a parent of a student is unhappy and seeks action by the College”.

A complaint is considered to be ‘formal’ if it moves beyond Stage 1, as below. Although all formal complaints must be made in writing, this does not mean that the formal stage is automatically triggered whenever a concern is expressed in writing, for example, by email.

A complaint will usually only progress to the formal stage after first being considered at the preliminary stage and only then if the complainant intends to escalate a matter to the formal stage.

This policy sets out procedures for existing parents. If a person outside of the College community wishes to raise a concern, they should contact the Head of College directly at [dcspd.headofcollege@dulwich-shanghai.cn](mailto:dcspd.headofcollege@dulwich-shanghai.cn)

### **Policy Statement (2): General**

- 1) This policy applies to all members of the DCSPD College community.
- 2) DCSPD implements this policy through adherence to the procedures set out in the rest of this document.
- 3) This policy is made available to all interested parties, in accordance with our *Provision of Information* policy. It should be read in conjunction with related Parental Handbooks from the College’s respective Schools.
- 4) This policy is reviewed at least annually, or as events or legislation changes require, by CLT.

### **Key Personnel**

- 1) Caroline Taylor: Head of College
- 2) Angela Hencher: Director of Business Administration; Complaints Co-ordinator
- 3) Lee Mack: Director of Communication
- 4) Alison Derbyshire: Head of Senior School
- 5) Victoria Foster: Head of Junior School
- 6) Katherine Weir-Davis: Head of DUCKS

- 7) David FitzGerald: DCI Managing Director, International Colleges

### Stages of Complaint – Overview

Each of the stages below will usually occur in order and there will usually be no return to previous stages. It should be stressed that the majority of complaints are resolved on an informal basis (Stage 1), and this is the default understanding for the College's process; formal levels are only considered if informal actions have evidently failed to resolve the matter reasonably (please note exceptions below).

Stage	Level of Complaint	Responsibility
1	Informal discussion and resolution	School staff
2	Complaint in writing addressed to and investigated by the respective Head of School	Head of School
3	Complaint in writing addressed to and investigated by the Head of College	Head of College
4	Complaint in writing addressed to and reviewed by the DCI Managing Director, International Colleges	DCI Managing Director, International Colleges

### Circumstances under which this procedure should not be used

- 1) Child protection procedures
- 2) Student exclusions
- 3) Student admissions
- 4) Issues related to criminal investigations and employee grievances must also all be handled separately from this policy.

This complaints policy is distinct from formal staff disciplinary proceedings and this should be made clear to all concerned. There may be occasions where a complaint gives rise to disciplinary procedures which put the complaints process on hold. If and when this occurs, the complainant should be informed. Any non-disciplinary aspects of the complaint should continue to be dealt with through the usual complaints procedures.

### Circumstances under which stages of the procedure should be missed out

- 1) This policy sets out the most suitable and effective process for dealing with the majority of complaints that are not covered by alternative procedures (see above). In most cases any concern or complaint, regardless of whose attention to whom it is initially brought, should be discussed informally (Stage 1) before being submitted at any of the following consecutive formal stages.
- 2) However, occasionally there will be circumstances under which it is unsuitable for complaints to be dealt with in this way.

- 3) In all cases where the complaint concerns the Head of College directly – that is, the explicit behaviour of the Head of College as opposed to school policy or procedures, of which the Head of College may be considered a representative – the matter should be raised directly at Stage 4. A complaint against a member of the whole College leadership team – that is, the explicit behaviour of an individual as opposed to respective school policy or procedure, of which the CLT member may be considered a representative – will be dealt with by the Head of College and will commence at Stage 3.
- 4) Complainants may choose to contact the Head of College directly of their own accord. In these cases it will be at the discretion of the Head of College as to whether or not it is appropriate for the complainant to discuss the matter informally (i.e. return to stage 1).

### **Who is allowed to complain?**

The procedures in this policy may be used by any parent or guardian of a student who is currently registered on College roll. This policy does not apply to parents of prospective students. It does apply to past students if the specific complaint was initially raised in accordance with this policy, when the student was still registered.

### **Publicity and Communication**

- 1) Dulwich College Shanghai acknowledges best practice in having a Complaints procedure.
- 2) The policy is made available on the College's website.
- 3) All staff are made aware of the complaints procedure and the various stages involved.
- 4) At all stages of the complaints procedure, everybody involved needs to be clear about what is happening and what their responsibilities are. In addition, the complainant should be told how to proceed to the next stage of the procedure if and when their complaint is not upheld.

### **Confidentiality**

Complainants have the right to know that correspondence, statements and records relating to individual complaints are to be kept in appropriate confidence except where a body conducting an inspection requests access to them.

### **Equal Access, Accompaniment and Representation**

- 1) Appropriate steps should be taken to ensure that any individual has the opportunity to raise their concerns or submit a formal complaint. This includes the right to be accompanied or represented by a friend or relative at discussions and hearings and/or to submit formal complaints, which have been written by another individual on their behalf.
- 2) It is an expectation that equal respect will be granted to each person involved within the process and that differences between people will be respected and understood.
- 3) A translator can be provided, on request. The choice of translator in all circumstances must be agreed by all parties, in respect of providing an impartial and objective service.

### **Monitoring Complaints**

At all stages of formal complaints, the following information is recorded in writing and held for a minimum of three years:

- 1) The name of the complainant;
- 2) The date and time at which the complaint was made;
- 3) The details of the complaint;
- 4) The desired outcome of the complainant;
- 5) How the complaint is investigated (including written records of interviews held);
- 6) Findings and recommendations of investigations;
- 7) Any action taken;
- 8) The complainant's response (satisfaction or further pursuit of complaint).

A record of all formal complaints is kept by the Complaints Coordinator, as named under *Key Personnel*, in accordance with best practice.

The record of complaints; constituting all formal complaints at stage 2 or above and any stage 1 (informal) complaints as considered relevant at the time; and their outcomes is reviewed regularly by the College Leadership Team to identify whether review or change in practice is needed and so that patterns can be identified and appropriate interventions made. Complaints pertaining to the EYFS are kept for a minimum of three years and inspection bodies are provided, 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. A report is also be made to the Board of Trustees on a regular basis.

### **Findings and Recommendations**

At each formal stage of the complaints procedure, any findings and recommendations will be communicated to the complainant and, where relevant, the person complained about. It may be appropriate for the College/School to offer one or more of the following:

- 1) an apology;
- 2) an explanation;
- 3) an admission that the situation could have been handled differently or better;
- 4) an assurance that the event concerned will not recur;
- 5) an explanation of the steps that have been taken to ensure that it will not happen again;
- 6) an undertaking to review College policies in light of the complaint.

In the second instance, the complainant may then choose to take no further action or to take their complaint to the next relevant stage.

### **Time Scale**

- 1) Although each of the stages within the procedure should occur consecutively, it is not necessary for each stage to follow the last immediately. Complainants may need some time to

decide whether or not they wish to pursue the matter any further.

- 2) After each stage, the complainant and the individual dealing with their complaint at that time should agree an appropriate time limit within which the next stage should be accessed, if at all. If the complaint is not submitted to the next stage within this agreed time limit it will be considered as closed. For example, an outside limit of 28 working days would normally be set.
- 3) For EYFS, the requirement to notify complainants of the outcome of an investigation within 28 actual days of having received the complaint.

### **Changes to Time Limits and Deadlines**

- 1) Time limits relate to College working days in term time.
- 2) In general, the time limits and deadlines contained within this policy should be adhered to. However, in certain circumstances it may be deemed inappropriate or impossible to guarantee that this is possible.
- 3) Where a complaint leads to criminal proceedings this will always be the case.
- 4) If and when it becomes necessary to alter the time limits and deadlines set out within this policy, the complainant should be told and given an explanation as to why this has been the case.

### **Appeals**

If, at any stage, as the result of a complaint, a decision or course of action is taken with regards to an individual (apart from the complainant) which they feel is ungrounded, unjustified or incorrect they have the right to appeal to the DCI Managing Director, International Colleges at [david.fitzgerald@indulwich.com](mailto:david.fitzgerald@indulwich.com)

## **STAGE 1: Informal Discussion**

### **Introduction**

The vast majority of concerns and complaints can be dealt with informally. There are many occasions where concerns are resolved immediately without the need to submit a formal complaint. Indeed, many concerns raised at this level might not be classified as complaints. A complainant will be asked if they wish the issue that they have raised to be recorded as a complaint. Complaints or concerns at this stage may be verbal or written and addressed to the relevant member of staff.

### **Monitoring**

Details of the complaint/concern and action taken, if applicable and appropriate, are recorded in the relevant student's file.

This information should be entered by the member of staff responsible for dealing with the complaint/concern. As a matter of course, the relevant line manager to the member of staff dealing with the complaint/concern should be informed of the concern and the outcome.

### **Time Scales**

At this stage, issues should be acknowledged within 24 hours and then considered within 5 working days.

### **Response**

The individual who raised the issue should be informed of any findings or recommendations taken to resolve the matter.

### **Options for Complainant**

If the individual is dissatisfied with the response they have been given and would like to take their complaint further, they should be referred to the College's complaints procedure and told how to move on to the next stage.

## **STAGE 2: Complaint in Writing Addressed to The Head of School**

### **Introduction**

This is the first stage of the formal complaints process and, as a result, all communications between parties need to be carefully recorded and monitored as set out in the 'monitoring complaints' section of this document. Complaints at this stage must be written and addressed to the Head of School.

### **Monitoring**

A formal record of the complaint will be kept by the Complaints Coordinator. If the complaint is addressed to the Head of School, the Head of College will also be informed and kept updated on progress.

### **Process**

If the complainant so wishes they can use the template on Page 15. If the complainant has difficulty in putting the complaint in writing, they are asked to make an appointment with the Head of School who will help.

The Head of School will decide the best person to hear the complaint. It would be helpful if the complainant could indicate if there is someone with whom they might have difficulty discussing the complaint so that their views can be respected. Similarly, if the member of staff directly involved feels too compromised to deal with the complaint, the Head of School may consider referring the complainant to another staff member. The member of staff may be more senior but does not have to be.

In most instances, there will need to be an investigation in order to understand the circumstances surrounding the complaint. That investigation will normally be undertaken by the nominated person, or by the Head of School, as may be considered most appropriate in each circumstance.

As indicated within the 'equal access, accompaniment and representation' section of this document, all individuals have the right, at this or any other stages, to be accompanied or represented by a friend or relative at discussions and hearings. This includes the right of teachers to be accompanied by a colleague. If necessary, the investigator will interview witnesses and take statements from those involved. If the complaint centres on a student, the student will also usually be interviewed. When students are interviewed, an additional member of staff should always attend.

### **Time Scales**

The Head of School should formally acknowledge the complaint within 24 hours of receipt and should ensure that the investigation is completed within 5 school days.

### **Response**

The individual who raised the complaint should be informed in writing of any findings or recommendations as a result of the investigation.

**Options for Complainant**

If the individual is dissatisfied with the response they have been given and would like to take their complaint further, they should be referred to the College's complaints procedure and told how to move on to the next stage.

### **STAGE 3: Complaint in Writing Addressed to The Head of College**

#### **Introduction**

This is the second stage of the formal complaints process and, as a result, all communications between parties need to be carefully recorded and monitored as set out in the 'monitoring complaints' section of this document. Complaints at this stage must be written and addressed to the Head of College.

#### **Monitoring**

A formal record of the complaint will be kept by the Complaints Coordinator. If the complaint is addressed to the Head of College, the Managing Director, International Colleges will also be informed and kept updated on progress.

#### **Process**

If the complainant so wishes they can use the template on Page 15. If they have difficulty in putting their complaint in writing, they are asked to make an appointment with the Head of College who will help.

The Head of College will decide the best person to hear the complaint. It would be helpful if the complainant could indicate if there is someone with whom they might have difficulty discussing the complaint so that their views can be respected. Similarly, if the member of staff directly involved feels too compromised to deal with the complaint, the Head of College may consider referring them to another staff member.

In most instances, there will need to be an investigation in order to understand the circumstances surrounding the complaint, and why the complaint has progressed from stage 2 to 3. That investigation will normally be undertaken by the nominated person, or by the Head of College, as may be considered most appropriate in each circumstance.

As indicated within the 'equal access, accompaniment and representation' section of this document, all individuals have the right, at this or any other stages, to be accompanied or represented by a friend or relative at discussions and hearings. This includes the right of teachers to be accompanied by a colleague. If necessary, the investigator will interview witnesses and take statements from those involved. If the complaint centres on a student, the student will also usually be interviewed. When students are interviewed, an additional member of staff should always attend.

#### **Time Scales**

The Head of College should formally acknowledge the complaint within 24 hours of receipt and should ensure that the investigation is completed within 5 school days.

#### **Response**

The individual who raised the complaint should be informed in writing of any findings or recommendations as a result of the investigation.

**Options for Complainant**

If the individual is dissatisfied with the response they have been given and would like to take their complaint further, they should be referred to the College's complaints procedure and told how to move on to the next stage.

## **STAGE 4: Complaint in Writing Addressed to and Reviewed by The Managing Director, International Colleges**

### **Introduction**

Complaints rarely reach this formal level, but it is important that the Managing Director is prepared to deal with the complaint.

Upon receiving a formally submitted complaint at this stage the Director of Schools will follow DCI procedures and policy.

### Formal Complaint Form

Please complete in BLOCK CAPITALS and return to the Complaints Coordinator who will acknowledge receipt and explain what action will be taken.

<b>Your name</b>	
<b>Student's name</b>	
<b>Your relationship to the student</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Daytime telephone number</b>	
<b>Evening telephone number</b>	
<b>Please give details of your complaint</b>	
<b>What action, if any, have you already taken to try and resolve your complaint? (To whom did you speak and what was the response?)</b>	

<b>What actions do you feel might resolve the problem at this stage?</b>
<b>Are you attaching any paperwork? If so, please give details</b>

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

<b>For Official use only</b>	
Date acknowledgement sent	
Acknowledgement sent by	
Complaint referred to	
Complaint referred on (date)	