



Policy Name: Management of Feedback and Complaints Policy

Policy number: DCSG-PM-MGT-11	Version number: 07	
Developed by: CLT	Approved by: CLT	Approval Date: 02 March 2023
Date last reviewed: 30 January 2023	Reviewed by: Head of College	Date of next review: 30 January 2025
Policy Location Staff Parents		

1. Purpose of Policy

The purpose of this policy is to set clear processes for the management of feedback and complaints at Dulwich College (Singapore) (DCSG). Resolutions adopting the closed loop feedback and complaints management system should be addressed in a positive way that contribute to systems improvement of DCSG's educational environment and its curriculum. Besides addressing the types of feedback and complaints an international school is expected to receive, this policy has a section dedicated to handling feedback and complaints related to personal data, which has taken on a different level as personal data handling in Singapore is now subject to legislation, specifically the Personal Data Protection Act 2012 (PDPA).

2. Scope

DCSG will ensure that feedback and complaints are expeditiously managed within the framework of the College quality management practices, except for feedback/complaints concerning personal data which are to be handled by dedicated procedures described in later part of this policy. Students are central to the College's education and as such every effort will be taken to investigate and to resolve complaints in a positive manner. The College will review systems and procedures for improvement in the light of relevant circumstances, whenever necessary and for transparency purposes. In the event if external interventions are required, the College will in the best interest of all parties find an amicable solution to resolve the matter, not discounting the means of mediation and arbitration if all internal resources are exhausted.

"Expediently" shall mean that written complaints are acknowledged within 3 working days of receipt. Complaints shall be addressed and solved within 14 working days by the College and within 21 days for more complex investigations. For Data Protection feedback and complaints, the timeframe will adhere with the PDPCs guidelines for

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managing Data Protection complaints (**Annex A**). Do note that as feedback can be generic, the College will have the discretion of the needs to reply to students.

3. Policy Details

A feedback or complaint in all good intent and purposes normally arises from a concern. In the best interest of all parties concerned, the College encourages open communication where such concerns are shared first with respective persons of responsibilities in the College. Besides from ensuring an effective feedback management system, feedback will also be utilized by the College Leadership Team and/or Board of Management to identify what drives positive experiences so that the College can enhance on the relevant initiatives implemented.

The College Leadership Team will review the policy and process for management of feedback and complaints once every two years or as and when necessary, for continual improvement.

A. General Principles

- Students are at the centre of all our concerns—their needs come first.
- We want the best possible outcome for them.
- Give and expect both courtesy and consideration.
- The views of everyone concerned should be heard and valued.
- All concerned have rights—students, parents and staff.
- Confidentiality should be respected.
- Communication is the key to solving disputes and disagreements.

B. Sharing Concerns

The key to ensuring that students are happy, safe, achieving and successful is open communication—between our school, students and parents. As a school, we commit to ensuring that parents are kept fully informed of general school information and specific matters relating to their own children in areas such as academic progress, curriculum, pastoral care, discipline, assessment and social development. In return, it is vital that students and parents indicate as early as possible when they start to feel concerned about.

There are many ways to share early concerns, such as:

- speaking directly to the class teacher, form tutor or subject teacher
- sharing the problem with the school counsellor
- speaking with a head of year.

For more serious concerns, parents/students should ask for an appointment with the appropriate Heads of Schools.

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C. Summary of Whom to Speak To

There are a range of people in the College who have the responsibility for a range of different areas where a student or parent can take their concerns and complaints:

- Routine matters relating to classwork and homework - Class teacher
- Concerns about student behaviour - Class teacher, form tutor, year coordinator (DUCKS & Junior School), head of year (Senior School) or school counsellor
- Quality of teaching - Heads of individual schools
- Programmes of work/curriculum content- year coordinators (DUCKS & Junior School or subject leaders (Senior School)
- Personal, social, emotional, health and well-being - class teacher (DUCKS & Junior School), form tutor, head of year or deputy head—pastoral (Senior School), school counsellor
- Enrolment - Head of Admissions, Director of Admissions and Marketing
- Communications – Director of Communications
- School fees and other financial matters - Director of Business Administration & Bursar
- CCA, trips, Outdoor and Ignite – Director of Learning Beyond the Classroom
- Events and activities – Director of Admissions and Marketing
- Sports – Director of Sport
- Concerns regarding the College’s operations and facilities (e.g. security, cleaning, food provider, transport provider) – Head of Operations, Director of Business Administration & Bursar
- Safeguarding concerns about a child - Whole College Child Protection Officer, or Heads of Individual Schools
- Safeguarding concerns about an adult - Head of College or EiM Chief Education Officer
- Overall College policy – Head of College

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- Leadership concerns – Head of College
- Appeal of permanent exclusion of students from the College - Chair of Board of Trustees (via Head of College's EA)
- Allegations against members of staff – Head of College
- Head of College – DCMI (Information can be obtained from the Head of College's EA)
- Personal data handling – Data Protection Officer (DPO)

D. Formal Feedback and Complaints

In the event if a parent/student wishes to make a formal complaint, this may be submitted in writing or by email or via an appointment with the respective person(s) mentioned in point 3C above. If the parent/student would like to address the complaint to the Head of College (nick.magnus@dulwich.org), they can email or make an appointment through the Head of College's EA.

It is the College's aim to resolve written complaints quickly. Other than for complex complaints, we would expect to provide parents/students with a written acknowledgement either verbally, in email or letter within 3 working days to formal complaints and solve the complaint within 14 working days from the time the formal feedback or complaint is received, stating any action which has been taken, or stating that no further action will be taken, and giving reasons for this response. The College will aim to solve all complex complaints within 21 working days.

In cases of School holidays where senior management/management/staff may not be available/contactable, they will ensure that the feedback/complaints are acknowledged (within 3 working days) and resolved within 21 working days upon receipt of the feedback/complaints.

Complaints are recorded in the Complaints Register, managed by the EA to the Head of College.

In the event the complaint/feedback involves personal data (which may come from government agencies as well), it must be handled according to the procedures and timelines laid out in **Annex A**. DCSG's Data Protection Policy and the DPO should also be referred to or consulted at every stage of handling personal data.

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E. Vexatious or Abusive Complainants

Most parents raise complaints in a reasonable way. However, this may not always be the case. Some people may become vexatious when they repeatedly or obsessively pursue an outcome which is unreasonable or unrealistic.

If a person pursues a complaint in this way, the College may take one of the following courses of action as appropriate:

- Write to the person, reiterating that the matter is concluded and no further correspondence should be expected in relation to the issue raised.
- If the correspondence continues, that it will be read and noted but will receive no further acknowledgement.
- Provide a short response referring to previous documents that have already addressed the issues raised.
- Refer the matter to Dulwich College Management International.

Verbal aggression is rare, but it can be intimidating and unacceptable. Everyone should expect to be treated courteously. The College will not accept or tolerate threatening behaviour towards staff, and will take appropriate action if required.

F. Anonymous Complaints

The College does not respond to anonymous complaints.

G. Monitoring of Feedback and Complaints

The College will monitor feedback and all complaints made in writing in an attempt to review and evaluate existing policies and procedures for continual improvement.

Formal feedback and complaints received from the following channels will be directed to the EA of the Head of College who manages the Complaints Register or the Data Protection (DP) Team or DPO who centrally maintains a [Personal Data Protection Complaint Register] for the College.

The Head of College's EA will record the feedback and complaints received and document the resolution's processes and the DP Team or DPO doing the same for personal data-related feedback/complaints.

Review of formal feedback and complaints will be included as an agenda in the CLT meeting, where the College senior management team will discuss and find resolutions to complaints received and to discuss on policies/procedures reviews as a result of these complaints if relevant.

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H. Dispute Resolution

In the event if a parent/guardian is dissatisfied with the College's resolution after having exhausted all internal avenues, they may approach the Singapore Mediation Centre (SMC) or Institute of Arbitrators (SIArb) through the SkillsFuture Singapore (SSG) Mediation-Arbitration Scheme for the [mediation/arbitration process](#) to resolve the dispute. For disputes over personal data, they should be resolved by an independent third-party consultant specialising in the subject. If the complainant remains dissatisfied, he/she has the right to escalate the complaint to the data protection regulator – the Personal Data Protection Commission (PDPC).

I. Key Contacts

- Head of College
- Head of College's EA
- Assistant Head of College
- Head of DUCKS
- Head of Junior School
- Head of Senior School
- Deputy Head of DUCKS
- Deputy Head of Junior School
- Deputy Head of Senior School
- Director of Business Administration & Bursar
- Director of Admissions and Marketing
- Director of Communications
- Director of Sports
- Director of Music
- Director of Learning Beyond the Classroom
- Data Protection Officer (DPO)

If you wish to contact any of the above mentioned staff, please contact our School Office for their emails.

DUCKS: ducksoffice.singapore@dulwich.org

Junior School: junioroffice.singapore@dulwich.org

Senior School: senioroffice.singapore@dulwich.org

A copy of this policy will be made available to all parents/students in the [Parent Portal](#).

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4. Implementation Details

A. Overview: Feedback from Parents/Students

DCSG adopts a closed loop approach in feedback and complaint management. A parent can lodge a formal feedback or complaint either through email, telephone (this has to be authenticated) or lodging the complaint personally. Feedback and all complaints are to be forwarded to the Head of College's EA and documented for details for further investigation.

The overall responsibility for managing student's feedback on general student affairs in school rests with the Admission/Marketing/Communications and respective schools in the College. Those relating to the academic faculties, outlet operations and delivery of courses rest with the respective Teachers and Deputy Heads which must be recorded. For Feedback and Complaints relating to areas other than those mentioned above, the relevant person(s) as outlined in section 3C of this policy are responsible for addressing them.

Feedback and complaints of a serious nature are to be discussed as an agenda in CLT meetings or AEB meetings, according to the context of the complaint.

By and large, parents/students are encouraged to resolve any issue as close to source as possible. Besides the class teacher, parents/students may also communicate their views through the other feedback channel to the school counsellor.

Should the matter not be resolved at the first level, a dispute resolution process shall be initiated. In this process, the complaint shall be progressively managed as it escalates up the hierarchy in the College.

The Head of College shall be the final authority, after consultation with CLT/DPO (for personal data matters), at the level within DCSG. Beyond this level, the matter will be escalated to an external body, which is primarily the Committee of Private Education and their recommendation, or an independent third party specializing in data protection for personal data matters and if that fails, to PDPC.

The person/division handling the complaint or investigation will establish the facts and gather the relevant information, and if necessary and/or practical, interview those involved. For non- personal data related complaints, complainants will receive a response within 14 working days outlining the outcome of the complaint or, if it is a complex matter, he or she will receive the results of the investigation within 21 working days of the College receiving the complaint. Full details of the complaint, including the outcome and length taken to resolve them, will be logged into the Complaints Register by the Head of College's EA. For personal data-related complaints, the response times will follow the timelines of **Annex A** and the DP Team/DPO will be responsible to update the investigation progress in the [Personal Data Protection Complaint Register].

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B. Escalation to an external body – SkillsFuture Singapore (SSG) Mediation-Arbitration Scheme

If the matter remains unresolved or the parent/student is unsatisfied with the outcome, parents/students may seek redress via the SSG Mediation-Arbitration Scheme.

Depending on the type of complaints, the parent/student will be referred to the Singapore Mediation Centre (SMC) or Singapore Institute of Arbitrators (SIArb) to go through the [relevant resolution procedures](#).

If the matter relates to personal data, the College shall suggest to the Complainant to jointly appoint an independent third-party consultant specializing in the subject to review the case, and if the complainant refuses or is dissatisfied with the outcome, he/she should be advised of his/her right to bring the matter to PDPC.

5. Review of Feedback and Complaints by College Leadership Team

Review of formal feedback and complaints as documented in the Complaints Register will be included as an agenda in the CLT meeting, where the College Leadership Team will discuss and find resolutions to complaints received, and to discuss on policies/procedures reviews as a result of these complaints if relevant. Negative feedback from parents may also be brought up during the Board of Management meetings for discussion. Positive feedback/compliments will also be discussed by College Leadership Team and/or Board of Management during the respective meetings to identify positive experiences from students and parents so that the College can enhance on the different initiatives implemented.

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6. Other related policies and procedures

Documents related to this policy	
Related policies	DCSG Data Protection Policy
Forms or other organisational documents	Complaints Register CLT/BOM Meeting Minutes Personal Data Protection Complaint Register Personal Data related Complaints and Feedback Handling Process (Annex A)

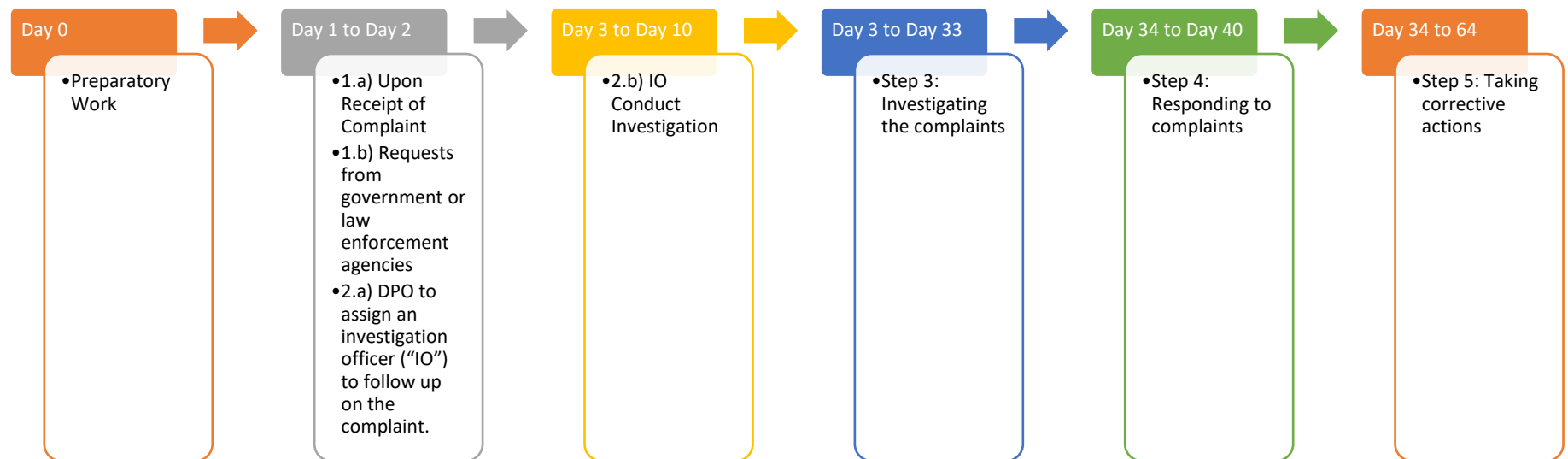
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Annex A – Personal Data-related Complaints and Feedback Handling Process

Overview:





Detailed Steps:

Stages of Complaint Process	Detailed Description of Steps Taken	Turnaround Time	Person-In-Charge
Step 1: Initial handling of complaints	<p>1.a) Preparatory Work</p> <ul style="list-style-type: none"> • Create and maintain a [Personal Data Protection Complaint Register] to keep track of the status of the complaints in relation to personal data. <p>1.b) Upon Receipt of Complaint (i.e from DCSG’s “Contact Us” webform)</p> <ul style="list-style-type: none"> • (DCSG employee) Inform relevant DPO or Department Rep (depending on nature of the complaint) • Send acknowledgement to complainant and give contact details of DPO. • Record enquiry/ complaint into the complaint register. • Inform DPO, senior management and department heads of all data protection related complaints, e.g., senior appointment holder of DCSG) <p>1.c) Requests from government or law enforcement agencies</p> <ul style="list-style-type: none"> • The recipient to inform Department Rep & DPO within the same day. • Send acknowledgment to relevant agency immediately (within the same day). • DPO & Department Rep to verify the records and reply accordingly. • Record enquiry/ complaint into the complaint register. 	<ul style="list-style-type: none"> • ASAP • Within 2 working days upon filing of complaint • Within 2 working days 	<ul style="list-style-type: none"> • DPO • DCSG employee (via mailbox) • Department Rep • DCSG employee • Department Rep • DPO



Stages of Complaint Process	Detailed Description of Steps Taken	Turnaround Time	Person-In-Charge
Step 2: Assessing the complaints	<p>2.a) DPO and Department Rep to assign an investigation officer (“IO”) to follow up on the complaint.</p> <p>2.b) IO Conduct Investigation</p> <ul style="list-style-type: none"> • Assess the validity of the complaint. • Call up complainant to verify complaint and clarifications, if necessary. • If complaint is valid, determine which of PDPA Obligation(s) have been breached and assess the impact and severity of the complaint/breach. • Notify senior management, DPO and if needed, department heads of the scope and severity of the complaint/data breach. • Assess the timeframe needed to achieve closure for the complaint and inform complainant accordingly. 	<ul style="list-style-type: none"> • Within 2 working days upon filing of complaint • Within 7 working days after IO is assigned 	<ul style="list-style-type: none"> • DPO • IO
Step 3: Investigating the complaints	<ul style="list-style-type: none"> • Determine what caused the data breach to take place, if applicable? • Which parties were involved? • How did this data breach occur and why it did it happen? (i.e. lapses in security, negligence, malicious intent) • IO to submit investigation report to DPO and senior management, including (i) all facts and findings (ii) recommendations on the remedial actions to be taken to achieve resolution of the complaint. 	<ul style="list-style-type: none"> • Based on estimates by IO but should be no longer than 1 month. 	<ul style="list-style-type: none"> • IO and affected personnel



Stages of Complaint Process	Detailed Description of Steps Taken	Turnaround Time	Person-In-Charge
	<ul style="list-style-type: none"> • DPO and senior management to determine if matter needs to be reported to the relevant authorities such as Singapore Police Force or Personal Data Protection Commission. • DPO and senior management to review and approve the investigation report before closure of complaint. 		
Step 4: Responding to complaints	<ul style="list-style-type: none"> • Once the investigation report is approved, to update complainant on the findings and outcome of the investigation and the remedial actions to be taken/implemented. • If complainant disagrees with the remedial actions, an independent third party consultant might need to be engaged in order to resolve the matter. • Record enquiry/ complaint into the complaint register. 	<ul style="list-style-type: none"> • Within 7 working days after the report has been approved 	<ul style="list-style-type: none"> • DPO/ Department Rep
Step 5: Taking corrective actions	<ul style="list-style-type: none"> • Analyse current and past complaints (if any) to determine if there are systemic issues that might cause such complaints to be lodged and implement changes to prevent repeat complaints from taking place in the future. • Once these systemic or procedural issues (if any) are identified, recommend specific actions such as fine-tuning of specific data protection policies and processes, staff training, etc. to prevent future recurrences. 	<ul style="list-style-type: none"> • Within 1 month after the report has been approved 	<ul style="list-style-type: none"> • DPO working with Department Heads (or senior management where necessary)



7. Review processes

Policy review frequency: Once every two academic years or as and when necessary for continual improvement	Responsibility for review: Head of College
Review process: i) Head of College to conduct review of policy. ii) Modification will be made where appropriate. iii) Submit for review and approval by the CLT via the DBA	

8. Approval Details

Approved by: Paola Morris

02 March 2023

Signature and Date

Signed only required in hardcopy

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9. Revision History

Revision Table:		
Date	Version	Review Description
13 September 2014	1	Initial Release
24 March 2016	2	Rewrote Policy
20 June 2019	3	Revamped Policy into new template, updated links for dispute resolution procedures by external bodies
20 August 2019	4	<ol style="list-style-type: none"> 1. Added 'Besides from ensuring an effective feedback management system, feedback will also be utilized by the College Leadership Team and Board of Management to identify what drives positive experiences so that the College can enhance on the relevant initiatives implemented.' under Section 3. Policy Details 2. Added 'The College Leadership Team will review the policy and process for management of feedback and complaints once every two years or as and when necessary for continual improvement' under Section 3. Policy Details 3. Added 'Assistant Head of College: Jacob Martin' under Section 3I. Key Contacts 4. Added 'Negative feedback from parents may also be brought up during the Board of Management meetings for discussion. Positive feedback/compliments will also be discussed by College Leadership Team and/or Board of Management during the respective meetings to identify positive experiences from students and parents so that the College can enhance on the different initiatives implemented' under Section 5. Review of Feedback and Complaints by College Leadership Team <p>Changed the policy review frequency from 'annually' to 'once every two years' under Section 7. Review Processes</p>

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06 October 2020	5	<ol style="list-style-type: none"> 1. Added 'Director of Communications: Juliet Wolfe under section 3I "key contacts" 2. Replaced title "Director of Admissions, Marketing and Communications" with "Director of Admissions and Marketing" throughout. 3. Replaced title "Headmasters PA" with "Headmasters EA" 4. Replaced "Director of Safeguarding" with "DCI Chief Education Officer" under section C 5. Added "Dominic Massarella" under section I Deputy Head of Senior School.
21 April 2021	6	<ol style="list-style-type: none"> 1. Added descriptions on handling feedback and complaints relating to personal data to paragraphs 1, 2, 3C, 3D, 3G, 3H, 3I, 4A and 4B. 2. Added new Annex A on "Personal Data-related Complaints and Feedback Handling Process" <p>Amended CPE Student Services Centre to 'CPE Mediation-Arbitration Scheme' and writeup for paragraphs 3H and 4B</p>
30 January 2023	7	<ul style="list-style-type: none"> • Headmaster changed to Head of College throughout. • Update to add Director of Learning Beyond the Classroom for complaints around CCAs, Trips, Outdoor Learning and Ignite. • Updated Head of College's email address • Updated to reflect that events and activities related complaints should be sent to Director of Admissions and Marketing. • Updated to reflect that Sports related complaints should be send to the Director of Sport.