International School of London

Complaints Policy

Date reviewed:
August 2025

To be reviewed:
August 2026

Mission statement

The International School of London Group is a culturally diverse community which fosters a passion and enthusiasm for learning, through outstanding educational practices. Students' cultural and linguistic identities are valued and nurtured through our international curriculum and Mother Tongue programme. Our school develops the attitudes, skills and understanding needed for active and responsible contributions to both local and global communities.

At the International School of London, we believe in:

- Empowering students to maximise their learning opportunities and to fulfil their potential.
- Actively integrating cultural diversity in the curriculum.
- Creating inclusive, vibrant and innovative learning communities.
- Offering a diverse and extensive international programme that supports personal, social and professional growth.

We believe this policy should be a working document that is fit for purpose, represents the school ethos, enables consistency and quality across the school and is related to the following legislation:

- Local Government Act 1974
- Local Government Act 1988
- Education Act 1996
- Data Protection Act 1998
- School Standards and Framework Act 1998
- Freedom of Information Act 2000
- Education Act 2002
- Education Act 2005
- Education and Skills Act 2008
- Apprenticeship, Skills, Children and Learning Act 2009
- Children, Schools and Families Act 2010
- Education (Admissions Appeals Arrangements) (England) (Amendment) Regulations 2008
- Education (Independent Schools Standards) Regulations 2010
- Equality Act 2010
- Education (non-maintained Special Schools) Regulations 2011
- School Admissions (Appeals Arrangements) (England) Regulations 2012
- Keeping Children Safe in Education 2023

The following documentation is also related to this policy:

- Complaints About Ofsted: Raising Concerns and Making a Complaint about Ofsted (Ofsted)
- School Admission Appeals Code (DfE)
- Equality Act 2010: Advice for Schools (DfE)
- Race Disparity Audit - Summary Findings from the Ethnicity Facts and Figures Website (Cabinet Office)

We believe that this school provides an excellent education and that the Head of School and Principals and school personnel work very hard to build positive relationships and have in place clear lines of communication with all parents and others. In so doing complaints are kept to a minimum.

However, we are aware that under section 29 of the Education Act 2002 and KCSIE 2023 we must have in place clear procedures to deal with any complaint made against the school or individuals connected with it. We take any complaint seriously and we deal with them professionally following set procedures. The School will ensure Social Services and LADO are contacted immediately when the harm threshold is met in line with KCSIE 2023.

At ISL, we distinguish between allegations that meet the harms threshold and those that do not. Allegations that meet the harms threshold are those that might indicate a person poses a risk of harm if they continue to work in their present position, or in any capacity with children at school. This approach should be followed where it is alleged that anyone working in our School, providing education for children under 18 years of age, including supply teachers, volunteers and contractors, has:

- behaved in a way that has harmed a child, or may have harmed a child and/or possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In cases where the harm threshold is met, a senior member of staff (Principal or Head of School) will be made the case officer. They will liaise with the Designated Safeguarding Leader. All procedures relate to supply staff and contracted staff, as well as full-time staff in our school. In certain cases, the Human Resources Department may provide a risk analysis, drawn up in consultation with LADO and other relevant parties (e.g. school lawyers). Fundamental to our approach at ISL, we understand that we have a duty of care both to our students and our employees. We will ensure that all employees are given appropriate welfare support when faced with difficult issues, including the offering of counselling and medical advice, where appropriate. The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. We acknowledge that it is an offence under the Education Act of 2011 for any person to publish any material that may lead to the identification of a teacher in a school that has been accused by, or on behalf of, a child from the same school. Allegation outcomes will align with KCSIE 2021 (therefore identified as substantiated, malicious, force, unsubstantiated, unfounded). In cases where an unsubstantiated, unfounded, force or malicious allegation is made, the School will explore the degree to which the child's own situation and wellbeing may have been a key factor in their behaviour, and whether help is needed. We will ensure that we keep full and accurate records for all allegations made in school.

ISL is dedicated to creating a culture in which all concerns about adults (including allegations that do not meet the harms thresholds) are shared responsibly with Principals of each section recorded and dealt with appropriately. This may be in consultation with the DSL, depending on the allegation.

Examples of low-level behaviour are being overly friendly with children, having favourites, taking photographs of children on a mobile phone, engaging with a child on a 1:1 basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating, or inappropriate language. Thorough records of low-level cases will be properly recorded.

We believe complaints need to be resolved as quickly as possible, but in some cases, we need to establish whether the issue brought to our attention is a complaint or an actual concern. In such cases 'many issues can be resolved informally without the need to invoke formal procedures'.

We agree with the definition that a concern is 'an expression of worry or doubt over an issue considered to be important for which reassurances are sought.' While a complaint is best defined as 'an expression of dissatisfaction however made, about actions taken or a lack of action'. By making this distinction between a concern and a complaint and taking all informal concerns seriously the number of concerns should reduce before developing into formal complaints.

We must be aware that besides parents/carers of children who are registered at this school any member of the general public can make a complaint about 'any provision of facilities or services' that we provide at this school.

We are aware that under the Education Act 1996 parents have the right to complain directly to the local authority about any matter relating to the school's curriculum, any issue relating to the general education that we provide.

We have a duty to inform parents and the general public who may wish to make a complaint against an organisation using school facilities that they must lodge their complaint with that organisation and not the school.

We have a duty to publish the complaints policy in the school handbook and on the school website with hard copies available from the school office.

We understand that a complaint may be made in writing, by telephone or in person. However, we will endeavour to accommodate those complainants who may be disabled or have learning difficulties by having in place alternative methods of registering a complaint.

We, as a School Community, have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

We believe it is essential that this Policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that is connected with this policy.

Aims

- To deal with any complaint against the school or any individual connected with it by following the correct procedures.
- To ensure we take all complaints seriously, whatever their level.
- To deal with all complaints thoroughly and by being open, honest and fair when dealing with the complainant.
- To differentiate between a concern and a complaint.
- To ensure compliance with all relevant legislation connected to this policy.
- To work with other schools and the local authority to share good practice in order to improve this policy.

Responsibility for the Policy and Procedure

Role of the Head of School

The Head of School has:

- a duty to have in place a complaints procedure;
- responsibility to ensure that the complaints procedure complies with their obligation under the Equality Act 2010;
- delegated powers and responsibilities to the Principals to ensure all school personnel and visitors to the school are aware of and comply with this policy;
- responsibility to deal with any complaint made against the Principals;
- responsibility not to share complaints with the Managing Director in case an Appeals Panel has to convene;
- responsibility to arrange for an independent panel to hear a complaint if the Head of School has been 'contaminated' by having full knowledge of the complaint;
- responsibility of annually discussing the concerns/complaints log with the Principals;
- in place a self-evaluation process to monitor the way complaints are dealt with and to consider what improvements can be made to the complaints procedures;
- responsibility of taking into account any local or national decisions that affect the complaints process, and will make any modifications necessary to this policy;
- responsibility for ensuring that the complaints procedure is publicised on the school website and in the school handbook, is concise, simple to understand and impartial;
- responsibility for ensuring that the school complies with all equalities legislation;
- nominated a designated Equalities Governor to ensure that appropriate action will be taken to deal with all prejudice related incidents or incidents which are a breach of this Policy;
- responsibility for ensuring funding is in place to support this Policy;
- responsibility for ensuring this Policy and all policies are maintained and updated regularly;
- responsibility for ensuring all policies are made available to parents;
- nominated a link governor to:

  ☐ visit the school regularly;
  ☐ work closely with the Principals and the HR manager;
  ☐ ensure this Policy and other linked policies are up to date;
  ☐ ensure that everyone connected with the school is aware of this Policy;

- make effective use of relevant research and information to improve this Policy;

- responsibility for the effective implementation, monitoring and evaluation of this Policy.

Role of the Principals

The Principals will:

- deal with all complaints impartially and in a non-adversarial manner;
- keep the complainant fully updated at all stages of the complaints procedure;
- keep records;
- not share third party information;
- seek an interpreter if the need arises;
- refer any complaint made against him/her to the Head of School;
- ensure full and fair investigations are undertaken by an independent person where necessary;
- ensure confidentiality at all times;
- ensure all complaints are resolved as quickly as possible within realistic time limits;
- log all complaints received by the school and records how they were resolved;
- discuss the complaints log every year with the Head of School;
- monitor and review complaints to see how they can contribute to school improvement;
- ensure all school personnel, pupils and parents are aware of and comply with this Policy;
- work closely with the Head of School;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- make effective use of relevant research and information to improve this Policy;
- monitor the effectiveness of this policy by speaking with school personnel, parents and the Head of School;
- annually report to the Head of School on the success and development of this Policy.

Role of the Complainant

We ask the complainant to:

- cooperate with school to find a solution to the complaint as quickly as possible;
- provide enough information as possible;
- be respectful to everyone involved in the complaint procedure.

Complaint Procedures

Stage 1 (Informal Stage)

- Complainant has an informal discussion with the person closely involved with the complainant's cause for concern or with the Principals direct.
- If after the discussion the matter is not resolved or if the complainant is not happy with the way that it has been handled then the process moves to the next stage.
- However, every effort should be made to resolve the matter at this stage.

Stage 2 (Formal Stage)

- Once a formal written complaint is received from the complainant then the Principals will undertake an investigation and reply in writing to the complainant within 15 days.
- However, if the complainant is not satisfied with the outcome, then the complainant should move to the next stage.
- If a formal written complaint is received about the Principals from the complainant, then the complaint must be sent to the Personal Assistant to the Head of School with a written reply being sent to the complainant within 15 days.
- If the complainant is not satisfied with the outcome, then the complainant should move to the next stage.

Stage 3 (Formal Stage)

- The complainant writes formally to the Personal Assistant to the Head of School outlining the reasons why he/she is not happy with the outcomes of the Principals' investigation.
- The complainant requests that an appeals panel reviews the complaint.
- An appeals panel meets within 12 to 20 days after receipt of the complainants letter.
- The complainant may request an investigation by the LA if he/she feels that that the review has not been handled fairly or if it has not been conducted in accordance with the school's complaints procedures.

Where formal meetings take place, the following will be upheld;

The headteacher (or designated member of the senior leadership team) will call a meeting to clarify concerns, and seek a resolution. The complainant may be accompanied to this meeting, and should inform the school of the identity of their companion in advance.
In certain circumstances, the school may need to refuse a request for a particular individual to attend any such meeting – for example, if there is a conflict of interest. If this is the case, the school will notify the complainant as soon as they are aware, so that the complainant has the opportunity to arrange alternative accompaniment.
The headteacher (or other person appointed by the headteacher for this purpose) will then conduct their own investigation. The written conclusion of this investigation will be sent to the complainant within [number] school days.

At the meeting

The meeting will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless a complainant’s own disability or special needs require it. Prior knowledge and consent of all parties attending will be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.
At the review panel meeting, the complainant and representatives from the school, as appropriate, will be present. Each will have an opportunity to set out written or oral submissions prior to the meeting. The complainant must be allowed to attend the panel

hearing and be accompanied by a suitable companion if they wish. We don't encourage either party to bring legal representation, but will consider it on a case-by-case basis. For instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by their union. Representatives from the media are not permitted to attend.

At the meeting, each individual will have the opportunity to give statements and present their evidence, and witnesses will be called as appropriate to present their evidence.
The panel, the complainant and the school representative will be given the chance to ask and reply to questions. Once the complainant and school representatives have completed presenting their cases, they will be asked to leave and evidence will then be considered.
The panel will then put together its findings and recommendations from the case. The panel will also provide copies of the minutes of the hearing and the findings and recommendations to the complainant and, where relevant, the subject of the complaint, and make a copy of the findings and recommendations available for inspection by the headteacher.

The outcome
The committee can:

- Uphold the complaint, in whole or in part
- Dismiss the complaint, in whole or in part
- If the complaint is upheld, the committee will:
- Decide the appropriate action to resolve the complaint

Where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future
The school will inform those involved of the decision in writing within 15 school days.

Complaints against the headteacher, a governor or the governing board

Stage 1: informal

Complaints made against the headteacher, The CEO or any member of the governing board should be directed to the Head of HR in the first instance.
If the complaint is about the headteacher or 1 member of the governing board, a suitably skilled and impartial governor will carry out the steps.

Stage 2: formal

If the complaint is:
The entire governing board or
The majority of the governing board
An independent investigator will carry out the steps in stage 2. They will be appointed by the governing board, and will write a formal response at the end of their investigation.

Referring complaints on completion of the school's procedure

If the complainant is unsatisfied with the outcome of the school's complaints procedure and the complaint is regarding the school not meeting standards set by the DfE in any of the following areas, the complainant can refer their complaint to the DfE:

- Education
- Pupil welfare and health and safety
- School premises
- Staff suitability
- Making information available to parents
- The spiritual, moral, social or cultural development of pupils

The DfE will consider reports of a major failure to meet the standards. Where appropriate, it can arrange an emergency inspection to look at pupil welfare and health and safety, and make sure that the school deals with serious failings.

For more information or to refer a complaint, see the following webpage: https://www.gov.uk/complain-about-school

Complaints regarding the Curriculum and General Educational Provision

All curriculum and general educational provision complaints will be dealt with by the Local Authority in line with their set complaints procedures.

Raising Awareness of this Policy

We will raise awareness of this policy via:

- the School Handbook/Prospectus
- the School website
- the Employment Handbook
- meetings with parents such as introductory, transition, parent-teacher consultations and periodic curriculum workshops
- school events
- meetings with school personnel
- communications with home such as weekly newsletters and of end of half term newsletters
- reports such as annual reports to parents and Principals reports to the Head of School
- information displays in the main school entrance

Training

All school personnel:

- have equal chances of training, career development and promotion
- receive training on induction which specifically covers:

  ☐ All aspects of this policy
  ☐ Communication
  ☐ Community Links
  ☐ Community Cohesion

- ☐ School Prospectus
- ☐ School Website
- ☐ Home-School Agreement
- ☐ Equal opportunities
- ☐ Inclusion

- receive periodic training so that they are kept up to date with new information
- receive equal opportunities training on induction in order to improve their understanding of the Equality Act 2010 and its implications.

Equality Impact Assessment

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation.

This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any pupil and it helps to promote equality at this school.

Monitoring the Implementation and Effectiveness of the Policy

The practical application of this policy will be reviewed annually or when the need arises by the HR Manager, the Principals and the nominated governor.

A statement of the policy's effectiveness and the necessary recommendations for improvement will be presented to the Head of School for further discussion and endorsement.

See Appendices Documents section on Policies for Schools Website

- Frequency of Policy Monitoring
- Monitoring Implementation and Policy Effectiveness Action Plan
- Initial Equality Impact Assessment
- Policy Evaluation
- Policy Approval Form

At ISL London, Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.