Charitable Objects of St. Catherine's School- *The Objects for which the Company is established are to promote and provide for the advancement of education by providing, conducting, governing, carrying on and maintaining in the United Kingdom, or elsewhere, a boarding or day School or Schools for girls in which the teaching shall be in accordance with the principles of the Church of England.*

ST CATHERINE'S SCHOOL BRAMLEY

COMPLAINTS POLICY

'Believe… Achieve… Succeed'

Policy Holder	Emma Watson and Naomi Bartholomew
Date Approved	August 2026
Approval	Academic Committee
Date for next review	August 2027

This policy will be reviewed annually or sooner if there are statutory revisions.

The Policy

St Catherine's has long prided itself on the quality of the teaching and pastoral care provided for its pupils and welcomes feedback, suggestions and comments from parents. The school takes seriously concerns or complaints which parents may wish to raise.

The aim of this policy is to achieve a fair, effective and timely resolution of parental concerns about the education and/or welfare of individual children in the care of the school. Information about the Complaints procedure is made available to parents of current girls and of prospective pupils via our website and it is also obtainable from the School Office on request. Although this policy is made available to parents of prospective pupils to view, it may only be used by parents of current pupils. The procedures apply to parents of all pupils including children in the Early Years Foundation Stage (EYFS). Whilst parents of boarders are entitled to use this complaints procedure, there is an additional complaints procedure for boarders themselves overseen by the Deputy Head – Boarding, Culture and Community. The Boarder Concern Procedure is on display in each House.

The expression "parent" is used for all those having parental responsibility for a child. Complaints by parents of former pupils will be dealt with under this Complaints Procedure only if the complaint was initially raised

in writing when the pupil to which the complaint relates was still registered as a pupil at the school. Every reasonable complaint shall receive fair and proper consideration and a timely response.

A **concern** may be defined as '***an expression of worry or doubt over an issue considered to be important for which reassurances are sought'.***

A **complaint** may be defined as '***an expression of dissatisfaction however made, about actions taken or a lack of action'.***

Any parental complaint about the school, about an individual member of staff, any matter about which a parent is unhappy and seeks action by the school is within the scope of this procedure. Complaints about any matter of School policy or administration affecting their children must be made in accordance with the following procedure except where the complaint relates to an exclusion which will be dealt with under the School's Exclusion Procedures: see Prep School and Senior School Behaviour Policies.

St Catherine's School will make available, on request, to the Secretary of State, Ofsted, the Department for Education (DfE) or the Independent Schools Inspectorate (ISI), details of this Complaints Procedure and the number of complaints registered under the formal procedure during the preceding school year. Correspondence, statements and records relating to individual complaints are to be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education and Skills Act 2008 requests access to them. There may also be other circumstances in which the school is required to share information relating to a concern or a complaint in order to comply with its legal or regulatory obligations.

The school is here for your child, and you can be assured that your child will not be penalised for a complaint that you raise in good faith. In the following sections, the term 'Head' relates to either the Head of the Preparatory School or the Head of the Senior School as appropriate.

The procedure for parents to raise a concern or complaint with the school is described below:

Concern Procedure

Should parents have a concern (defined as '*an expression of worry or doubt over an issue considered to be important for which reassurances are sought'),* the issue should be raised with their daughter's tutor (Senior) or form teacher (Prep). It is anticipated that most concerns will be resolved quickly and effectively at this stage.

Should the concern not be resolved, there is a 3 stage complaints process.

Three Stage Complaints Procedure

Stage 1 - Informal Resolution

It is hoped that most complaints and concerns will be resolved quickly and informally**.** In many cases, the matter will be resolved straight away by this means to the parent's satisfaction. Stage 1 complaints should be addressed to:

- **Preparatory School**: Deputy Head (Pre-Prep) / Deputy Head (Academic) / Deputy Head (Pastoral and Wellbeing)
- **Senior School**: Head of Department / Head of House/ Head of 6th Form / Deputy Head (Academic) / member of Senior Leadership Team (SLT)

Please note:

- Concerns relating to child protection allegations against a member of staff must be referred directly to the Head and will be dealt with in accordance with the School Safeguarding Policy and Procedures.
- Should the Head receive a complaint directly they have the right to delegate it to an appropriate line manager to deal with as a Stage 1 complaint.
- Complaints made directly to a Head of Department, Deputy Head, Deputy Head (Academic) or SLT will usually be shared also with the relevant form teacher and or Housemistress/Housemaster unless the line manager concerned deems it appropriate to deal with the matter personally. In this event the line manager will attempt to resolve the matter in 10 working days or as soon as is practicable.
- For day-to-day matters, it is the form teacher, tutor or Housemistress/Housemaster who has the closest knowledge of each girl's academic progress, activities and wellbeing.
- We will endeavour to acknowledge such emails or calls within 48 hours of their receipt (excluding weekends and school holidays) and to inform parents of how we intend to investigate the matter.
- A record will be made of all concerns/complaints and the date on which they were received.
- An email will always be written to parents, or a telephone call made, to conclude a matter, indicating how the issue has been dealt with and the outcome reached.
- Should a matter not be resolved within 10 working days, or if the relevant teacher and the parents fail to reach a satisfactory resolution, then parents will be advised to proceed with their complaint in accordance with Stage 2 of this procedure.
- If the complaint is against the Head, parents should make their complaint directly to the Chair of Governors whose contact details are available from the school website or School Office on request.

Stage 2 - Formal Resolution

- If the complaint cannot be resolved on at Stage 1, then the parents should put their complaint, **in writing**, to the Head - via the Head's EA/PA - head@stcatherines.info or prephead@stcatherines.info) - who will decide, after considering the complaint, the appropriate course of action to take. The complaint will be acknowledged within 2 working days.
- The Head may in some circumstances deem it appropriate to nominate a staff member to hear the complaint and manage the Stage 2 complaint process. The Head (or their nominee) will decide, after considering the complaint, the appropriate course of action to take.
- In most cases, the Head will meet with, write to or speak to the parents concerned, within 10 working days of receiving the written complaint. If possible, a resolution will be reached at this stage.
- It may be necessary for the Head to carry out further investigations. These will be completed as soon as is practicable. The Head (or their nominee) will determine who should carry out any investigation and this may be someone external to the school.
- If further time is needed by the Head to gather information pertaining to the investigation, the parent will be informed in writing.

- Records will be kept of all meetings and interviews held in relation to the complaint.
- Once the Head (or their nominee) is satisfied, so far as is practicable, that all the relevant facts have been established, a decision will be made, and parents will be informed of this decision in writing. The Head (or their nominee) will give reasons for their decision. In most cases, the Head will make their decision and provide the parents with reasons within 20 working days of the complaint being put in writing.
- If the complaint is against the Head, the complaint should be made to the Chair of Governors. The Chair of Governors will nominate someone to determine the complaint. The Stage 2 process described above will then be followed as if the references to the Head (or their nominee) is to the individual nominated by the Chair of Governors to determine the complaint against the Head.
- If parents are still not satisfied with the decision, they may take the opportunity to proceed to Stage 3 of this procedure.

Stage 3 - Panel Hearing / Appeal

- If parents seek to invoke Stage 3 (following a failure to reach an earlier resolution) they should do so in writing to the Clerk to the Governors, who has been appointed by the Governors to call hearings of the Complaints Panel to whom the matter will be referred for consideration within 5 working days of receiving the decision at Stage 2, setting out their grounds for appeal. Any supporting evidence which the parents wish to rely on should also be provided with their grounds for appeal.
- To the extent the parents are unable to provide their complaint within the time period stipulated due to extenuating circumstances which have impeded the parents from taking action, the parents should request an **extension in writing**. Such a request should be made via the clerk to the Panel in advance of the original deadline, setting out the further time period requested and the reason for this. This will be considered.
- In the event the parents are unable to provide their complaint within the time period stipulated (including to the extent applicable any extensions if agreed) the school reserves the right to conclude the complaint process and not progress the matter to Stage 3.
- The clerk to the Panel, who has been appointed by the Governors to call hearings of the Complaints Panel, will then refer the appeal to the Complaints Panel for consideration. The Panel will consist of three persons not directly involved in the matters detailed in the complaint, one of whom shall be independent of the management and running of the school. The clerk to the Panel/Chair of Governors will appoint one Panel member to act as Chair of the Panel OR The Complaints Panel will appoint one of the Panel members to act as the Chair of the Panel. The convenor, on behalf of the Panel, will then acknowledge the complaint within 5 working days and schedule a hearing to take place within 20 working days after acknowledgement of the parents' letter to invoke Stage 3.
- 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 or further investigation be carried out. Copies of such particulars shall be supplied to all parties not later than 5 working days prior to the hearing.
- The parents may attend the hearing and be accompanied to the hearing by one other person if they wish. The Stage 2 decision-taker shall also be entitled to be accompanied to the hearing by one other person if they wish. This may be a relative, teacher or friend. Legal representation will not be appropriate, and the companion should not be a lawyer. The Panel will decide whether it would be helpful for witnesses to attend.

- The remit of the Panel shall be at the discretion of the Chair of Governors and the manner in which the hearing is conducted shall be at the discretion of the Panel.
- If possible, the Panel will resolve the parents' complaint without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out.

- After due consideration of the merits of the complaint and all facts they 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.

- The Panel will write to the parents informing them of its decision and the reasons for it, within 5 working days of the hearing (although additional time may be required if it is necessary to carry out further investigations following the hearing).
- The decision of the Panel will be final. A copy of the Panel's findings and recommendations (if any) will be sent by electronic mail or otherwise given to the parents, and, where relevant, the person complained about as well as the Chair of Governors and the Stage 2 decision-taker.
- A copy of the Panel's findings and recommendations (if any) will also be available for inspection on the school premises by the Chair of Governors and the Head.

Timeframe for Dealing with Complaints

- All complaints will be handled seriously, sensitively and within clear and reasonable timescales.
- It is in everyone's interest to resolve a complaint as speedily as possible: the school's target is to complete Stages 1 and 2 of the procedure within 20 working days. Stage 3, the Appeal Panel Hearing, will be completed within a further 30 working days. See Appendix 1 below.
- Please note that, for the purposes of this procedure, working days refers to weekdays (Monday to Friday) during term time as published on its website, excluding Bank Holidays and half term. This means that during School holidays it may take longer to resolve a complaint although the school will do what is reasonably practicable to avoid undue delay.
- It may take longer to resolve a complaint where statutory agencies are involved (for example, the Local Authority or the Police), during periods of significant disruption to School life, or as a consequence of unavoidable staff absence. The timeframes set out in this Procedure may therefore change depending on the circumstances of an individual case. Any deviation will, however, be on an exceptional basis, and the School will take all reasonable steps to limit any such delay, and parents will be advised should timeframe revisions be necessary.

Persistent Correspondence

- The Procedure should be used as a mechanism for resolving issues in good faith and in a courteous manner. It should not be used in an abusive or threatening manner or in a way that is vexatious.

- Once a complaint is made by a parent and whilst it is being dealt with under the complaint's procedure, we request the parent refrains from repeated correspondence or contact with staff members that may be considered vexatious.
- Where repeated attempts are made by a parent to raise the same complaint after it has been considered at all three stages, this will be regarded by the school as vexatious and outside the scope of this procedure.
- Appendix 2 below covers unreasonable complaints.

Recording Complaints and use of Personal Data

- Correspondence, statements and records relating to individual complaints are to be kept confidential except where a request for access is made under section 109 of the Education and Skills Act 2008 or where the School is required to share information relating to a child protection concern or complaint in order to comply with its legal or regulatory obligations.
- Following resolution of a complaint, the School will keep a written record of all complaints, whether they are resolved at Stage 1 (informal stage), the formal stage (Stage 2) or proceed to a Panel hearing (Stage 3) and any action taken by the School as a result of the complaint (regardless of whether the complaint is upheld).
- The school processes data in accordance with its Privacy Notice. When dealing with complaints the school (including any Panel member appointed under the Stage 3 process) may process a range of information, which is likely to include the following:

    - Date when the issue was raised
    - Name of parent
    - Name of pupil
    - Description of the issue
    - Records of all the investigations (if appropriate)
    - Witness statements (if appropriate)
    - Name and contact details of member/s of staff handling the issue at each stage
    - Third party and internal reports
    - Copies of all correspondence on the issue (including emails and records of phone conversations)
    - Notes/minutes of the hearing, and
    - The Panel's written decision

- This may include 'special category personal data' (as further detailed in the School's Privacy Notice and Data Protection Policy, but potentially including, for instance, information relating to physical or mental health) where this is necessary owing to the nature of the complaint. This data will be processed in accordance with the School's Data Protection Policy.
- In accordance with data protection principles, details of individual complaints will be kept only for as long as is reasonably necessary in the circumstances. Complaints which do not have safeguarding implications will be retained for a minimum of seven years in accordance with our Data Protection Policies.
- The school will keep records of formal complaints and Complaints Panel hearings, as required by regulation. It will do so in accordance with its Privacy Notice, Data Protection Policy and Retention

of Records Policy. All records relating to complaints shall be treated as confidential. In addition to where requested by the Secretary of State or an inspector (see above), there may be other circumstances where disclosure of the substance of a complaint or particular confidential records relating to it is required, for example, where there is a legal, regulatory, safeguarding or data protection obligation (e.g., in response to a subject access request) which prevails over the requirement to maintain the records as confidential.

Complaints Relating to the Use of Personal Data

- Complaints relating to the handling of personal data will be managed in accordance with UK GDPR and **Section 164A of the Data Protection Act 2018**.
- Any individual wishing to exercise their data protection rights, including access, rectification, erasure, restriction, or transfer of their personal data, or to raise a concern regarding its infringement of personal data must do so in writing via email or post to Caroline Mead the Data Protection Officer (01483 893363) Email: caroline.mead@stcatherines.info, Post: St Catherine's School, Station Road, Bramley, GU5 0DF.
- The School will acknowledge such complaints within 30 days of receipt in writing, investigate them whilst keeping the complainant updated on progress and without undue delay, thus providing a clear outcome. Where appropriate, complaints will be managed alongside the School's Complaints Procedure to ensure compliance with both the Independent School Standards and data protection legislation.
- If the individual is not satisfied with the decision, they have the right to escalate their complaint to the Information Commissioner's Office (ICO) if they are dissatisfied with School's response or if School failed to respond in the appropriate timeframe.

Parents of EYFS Pupils

- Parents of EYFS pupils should follow the three stages of this Complaints Procedure. If parents remain dissatisfied and their complaint is about the school's fulfilment of the EYFS requirements, then parents may take their complaint to the ISI or Ofsted.
- Parents will be notified by ISI or Ofsted of the outcome of the investigation into their complaint within 28 days of the complaint being received.
- St Catherine's School will provide ISI/Ofsted, on request, with a written record of all complaints made during any specified period, and the action which was taken because of each complaint. The record of any such complaints will be kept in accordance with its Privacy Notice and Retention of Records Policy.
- Parents may complain directly to Ofsted or to ISI if they believe the provider is not meeting the EYFS requirements. Schools must make available details of how to contact Ofsted and/or the ISI:

Ofsted can be contacted at:
Ofsted, Piccadilly Gate, Store Street, Manchester M1 2WD
Telephone: 0300 123 1231 or by email: enquiries@ofsted.gov.uk

ISI can be contacted at:
ISI, CAP House, 9-12 Long Lane, London EC1A 9HA
Telephone: 020 7600 0100 or by email: concerns@isi.net

For the academic year 2025-26, St Catherine's School received 9 formal complaints.

Appendix 1

School Complaints Timeline

Stage	Action	Responsible Person	Timeframe	Notes
Stage 1: Informal Resolution	Complaint raised verbally or via email informally	Form teacher or tutor; HoD, Housemistress or SLT member	Within 10 working days	Aim to resolve informally if possible
Stage 2: Formal Resolution	Complaint submitted in writing	Headteacher or designated Senior Leader	Within 10 working days of receiving a written complaint.	Provide a copy of the complaints policy. May involve interviews or document review. Written response sent to complainant
	If further time is required, the Head will put it in writing	Headteacher	Within 20 working days of receiving a written complaint	Include findings, decisions and reasons.
Stage 3: Panel Hearing / Appeal to Governing Body	Complainant requests escalation within 5 working days	Clerk to Governors	Acknowledge within 5 working days	Confirm receipt and next steps
	Panel convened and hearing arranged	Chair of Governors	Within 20 working days of acknowledgement	Panel includes 3 persons not involved previously
	Outcome communicated in writing	Panel Chair	Within 5 working days of hearing	Final decision

Appendix 2

Unreasonable Complaints

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 Parents have with us. 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 or threatening. Where repeated attempts are made by a Parent to raise the same complaint after it has been considered at all three stages, this can be regarded as vexatious and outside the scope of the policy.

Unreasonable complaints are taken seriously by the School as they put a strain on valuable resources and hinder the progress of proper investigations. We adopt the Department for Education's definition of unreasonable behaviour as that which hinders our consideration of complaints because of the frequency or nature of the complainant's contact with the School, such as if the complainant:

- refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;
- refuses to co-operate with the complaints investigation process;
- refuses to accept that certain issues are not within the scope of a complaints procedure;
- insists on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice;
- introduces trivial or irrelevant information which the complainant expects to be taken into account and commented on, or raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales;
- makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- changes the basis of the complaint as the investigation proceeds;
- repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed);
- refuses to accept the findings of the investigation into that complaint where the School's complaints procedure has been fully and properly implemented and completed;
- seeks an unrealistic outcome;
- makes 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;
- uses threats to intimidate;
- uses abusive, offensive or discriminatory language or violence;
- knowingly provides falsified information;
- publishes unacceptable information on social media or other public forums.

A complaint may also be considered unreasonable if it is manifestly unjustified, inappropriate, or an improper use of formal procedure. In assessing this, the School shall have regard to all the circumstances of the case and the nature of the complaint itself rather than the nature of the complainant. In assessing all the circumstances of the case the School will consider a range of factors including:

- whether a complaint has reasonable foundation;
- the history and context of the complaint (and any evidence where relevant);
- whether the time and cost of investigating the complaint is proportionate to the issue(s) about which the complaint has been made;
- whether an investigation of the complaint is likely to cause a disproportionate or unjustified level of disruption, irritation or distress;
- unexplained delay in raising a complaint or issue;
- if the purpose of the complaint is to obtain an outcome which is unavailable via the complaints procedure, such as a claim for compensation, damages or a refund of fees paid;
- any evidence of a complaint being brought for an improper purpose.

Whenever possible, the Head and/or Chair of Governors will discuss any concerns with the parents informally before dismissing a complaint as unreasonable.