

COMPLAINTS POLICY AND PROCEDURE

Applicable to:	RGS Guildford RGS Prep, including EYFS
Author(s):	Secretary to the Board of Governors
Executive owner:	Director of Finance and Operations and Clerk to the Governors
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Date of next review:	Trinity 2027

1. Overview and Purpose

The Royal Grammar School, Guildford and RGS Prep (together, “the School”) are committed to providing the highest standard of education and pastoral care. This policy reflects the School’s values, ensuring clarity and consistency for pupils, staff and parents.

Throughout this policy, the terms ‘child’, ‘pupil’ or student’ are used to refer to all those attending the School. At the time of publication, the School is a boys’ School but is preparing to become co-educational. Nursery, Reception (Shell) and Year 3 at RGS Prep, and Year 12 (Lower Sixth) at RGS Senior will become co-educational from September 2027. Year 7 (1st Form) at RGS Senior will become co-educational from September 2028.

The School fosters a respectful and supportive environment in which concerns are taken seriously and addressed promptly. This policy sets out the School’s approach to handling complaints from parents, ensuring that they are managed fairly, consistently, and within reasonable timeframes.

For the purposes of this policy, a complaint is an expression of dissatisfaction about an action, decision or omission by the School which requires a response. Separate procedures apply for:

- Safeguarding concerns.
- Admissions process appeals.
- Exclusions or removal of a pupil by the Headmaster or Prep Head, where the parents seek a Governors’ Review of that decision.
- Staff grievances or disciplinary matters.
- Whistleblowing.
- Subject Access Requests.

2. Scope

This policy applies to parents of current pupils and of former pupils (provided the complaint was raised while the pupil was still enrolled). “Parent(s)” means the holder(s) of parental responsibility for a pupil about whom the complaint relates and will continue to apply to a complaint which is

ongoing when a pupil leaves the School. Anonymous complaints will not be investigated under this procedure.

This policy is not intended for parents of prospective pupils, however if you would like to raise a complaint about any aspect of the admissions process, you are invited to contact the Clerk to the Governors directly.

A complaint may relate to any matter about which a parent of a pupil is unhappy and seeks action by the School. It may be made about the School as a whole, about a specific department or about an individual member of staff. A complaint is likely to arise if a parent believes that the School has done something wrong, failed to do something that it should have done or has acted unfairly.

Complaints relating specifically to the School's handling of personal data will usually be dealt with separately from this general complaint's procedure, in accordance with the School's data protection complaints process. This ensures that such complaints are investigated by the appropriate person and handled in line with the School's obligations under data protection legislation

Complaints should normally be raised within three months of the matter occurring. The School may consider complaints raised outside this timeframe where there is a good reason for the delay and it remains possible to investigate fairly, but reserves the right to amend the process where the delay has gone beyond 3 months.

2.1 Principles

Accessibility: The procedure is available on the School's website and may be requested via email or print from the School Office. The number of complaints received by the School in the last academic year is also available upon request (stage 2 and above). If assistance with a request is required, please contact the Clerk to the Governors who will make appropriate arrangements.

Fairness: Complaints will be considered impartially and without prejudice. The School will be mindful of its obligations under the Equality Act 2010 in the application of this policy.

Confidentiality: All concerns will be handled with discretion and sensitivity. 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. 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 (see Section 4).

Protection: No individual will suffer adverse consequences for raising a genuine concern in good faith.

Timeliness: The School aims to resolve complaints within clearly defined and reasonable timeframes. The Procedure outlines these expectations, although exceptions may occur depending on the circumstances of each case. Working days refer to weekdays between the hours of 8-4pm (Monday–Friday) during term time only. This therefore excludes public holidays, School holidays, half terms and inset days. The term dates are published on the School's website. A complaint raised during the

School holidays will usually be deemed to have been received on the first working day after receipt (this being the first day of the next term).

Expected standards of behaviour: The School aims to work constructively with parents to resolve a complaint. Complaints will be dealt with confidentially and should not be discussed publicly, including via the press and social media. We do not expect our staff to tolerate unreasonable behaviour and will take action to protect staff where behaviour is abusive, offensive or threatening.

3. Complaints Procedure

3.1 Stage 1 – Informal Resolution

It is hoped that most complaints and concerns will be resolved quickly and informally as follows:

- At the Senior School, parents or guardians should normally contact their child's Form Tutor or Head of Year. If necessary, the matter may be referred to a Head of Department, the Director of Studies, or the Deputy Head.
- At RGS Prep, parents or guardians should normally contact their child's Class Teacher. If needed, the teacher may consult the Deputy Head responsible for complaints.
- Complaints made directly to senior staff (e.g. Headmaster, Deputy Head) will usually be referred to the appropriate tutor or teacher unless it is deemed appropriate to handle the matter directly.
- If the complaint concerns the Head of RGS Prep or the Headmaster, it should be directed to the Clerk to the Governors, who will make the Chair of Governors aware.
- A written record of the complaint and the date received will be logged.
- If the issue is not resolved within **fifteen working days**, parents may choose to proceed the matter to Stage 2.

3.2 Stage 2 – Formal Resolution

If Stage 1 informal resolution is unsuccessful, a written complaint may be made:

- The complaint should be addressed to the Head of RGS Prep or to the Headmaster of RGS.
- If the complaint concerns the Head of RGS Prep or the Headmaster, it should be directed to the Clerk to the Governors, who will make the Chair of Governors aware. The Chair of Governors will nominate someone to lead the complaint, and the process described below will then be followed (with the role played by the Head instead being the individual nominated by the Chair of Governors).
- The Head or Headmaster will respond within **five working days** to acknowledge the complaint and will normally seek to arrange a meeting or phone call at an appropriate time for all parties, to inform the investigation. This is to support their understanding of the matter and to help clarify the scope and nature of the concerns.
- The Head or Headmaster will further investigate and **written records** will be kept of all meetings and interviews held in relation to the complaint.
- Once the Head is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made and parents will be informed of this decision in writing. The Head will also give reasons for their decision. In most cases, the Head will make their decision and provide the parents with reasons within **fifteen working days** of the initial

meeting/phone call. Where further time is required to investigate the matter fully, this will be discussed with the complainant.

- If the complainant remains dissatisfied with the outcome, they may proceed to Stage 3.

3.3 Stage 3 – Formal Panel Hearing

If parents remain unsatisfied with the School's response at Stage 2, they may seek to request a formal Panel Hearing (Stage 3). This initiates a full panel hearing of the complaint. The Complaints Panel is not obliged to consider any new areas of complaint at this stage.

The following steps should be followed:

- The parent should submit a written complaint to the Clerk to the Governors using the template form at Appendix 1 within **ten working days** of receiving the Stage 2 outcome, including their grounds for requesting a Stage 3 hearing and supporting evidence. If extenuating circumstances prevent timely submission, parents may request an extension in writing. Such a request should be made to the Clerk to the Governors in advance of the original deadline, setting out the further time period requested and the reason for this. In the event the parents are unable to provide their complaint within the time period stipulated (including any agreed extension), the School reserves the right to conclude the complaint process and not progress the matter to Stage 3.
- The Clerk will refer the matter to the Chair of the Governing Body, who will arrange for the complaint to be heard before a specially convened Complaints Panel of three individuals not involved in the original complaint. One will be appointed as Chair of the Panel.
- The Clerk will acknowledge the appeal within **five working days** and schedule a hearing to take place within **thirty working days**. Additional documentation or investigation may be requested prior to the hearing. Parents may attend the hearing and be accompanied by one other person (this may not be a legal representative). The identity of the companions should be confirmed to the Clerk to the Governors as soon as possible, and by no later than **five working days** before the hearing.
- The Clerk will make documentation to be considered available to the Panel **five working days** before the hearing.
- 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. The Panel will decide whether it would be helpful for other witnesses to attend.
- Minutes of the hearing will be taken. These will not be verbatim notes but an accurate reflection of what was discussed. No recordings of the meeting (audio, video, or any other means) will be permitted. Notes of the hearing will be shared with attendees as soon as practicable after the hearing. Where there is any disagreement about the content of those notes, these will be considered and, where possible, resolved by the Chair 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 outcome 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 **five working days** of the hearing (although additional time may be required if it is necessary to carry out further investigations following the hearing).
- A copy of the Panel's findings and recommendations will be shared with the parents, the individual complained about (if applicable), the Chair of Governors, and the Headmaster. It will also be available for inspection on the School premises.
- Requests for financial awards, such as claims for compensation, damages or fee refunds, are beyond the scope of the School's complaints procedure.
- In accordance with its obligations relating to confidentiality, privacy and data protection, the School will not disclose details of any employment, disciplinary, pastoral or other management action relating to staff, pupils or other individuals arising from a complaint, regardless of the outcome. Nothing in this provision affects a complainant's rights under applicable data protection legislation.
- Unless the parent confirms that they are satisfied with the outcome of the complaint prior to the commencement of the hearing, it will proceed notwithstanding that the parent may decide not to attend. In these circumstances, the Complaints Panel will consider the parent's complaint in their absence and issue findings.
- The decision of the Panel will be final.

4. EYFS-Specific Complaints

Parents of pupils in the Early Years Foundation Stage (EYFS) should follow the three stages outlined in this Complaints Procedure. If, after completing all stages, parents remain dissatisfied and their complaint concerns the School's fulfilment of the EYFS statutory requirements, they may escalate their concerns directly to the external regulatory bodies listed below.

In compliance with the Statutory Framework for the EYFS (2024), written complaints relating to the Early Years Foundation Stages (EYFS) will be investigated, and findings issued within 28 days of the complaint being received.

5. Data protection complaints process

Data protection complaints should be made in writing to the School's Data Protection Officer (dpo@rgsg.co.uk). The School will acknowledge the complaint within 30 days and investigate it without undue delay, making appropriate enquiries and keeping the complainant informed of progress where necessary. The School will provide a written outcome, including any action it proposes to take. Complaints will be recorded and retained in accordance with the School's data retention arrangements. If the complainant remains dissatisfied, they may raise the matter with the Information Commissioner's Office (ICO).

6. In the Event That a Complaint Remains Unresolved

While the School will make every endeavour to resolve complaints promptly and fairly through its three-stage Complaints Procedure, in the unlikely event that a complaint remains unresolved, further steps may be available to parents and guardians.

6.1 Contact details for regulatory bodies

The following regulatory bodies may be available to provide advice to parents depending on the nature of the concern raised. Parents will be notified directly by ISI or Ofsted of the outcome of any investigation into their complaint.

Independent Schools Inspectorate (ISI)

 020 7600 0100
 concerns@isi.net
 CAP House, 9–12 Long Lane, London EC1A 9HA

For EYFS only: Ofsted (Office for Standards in Education)

 0300 123 1231
 enquiries@ofsted.gov.uk
 Piccadilly Gate, Store Street, Manchester M1 2WD

Information Commissioner's Office

 0303 123 1113
 [Contact us - public | ICO](#)

7. Unreasonable Complaints and Persistent Correspondence

A complaint may be regarded as unreasonable when the complainant refuses to articulate their grounds for complaint or outcomes sought or refuses to cooperate with the investigation process.

Very rarely, the School may feel the need to close a complaint where the complainant:

- I. Does not accept that certain issues are not within the scope of a complaints procedure.
- II. Insists on the complaint being dealt with in ways which are incompatible with the investigation procedure.
- III. Changes the basis of the complaint as the investigation proceeds.
- IV. Seeks an unrealistic outcome.
- V. Makes excessive demands on School time by frequent, lengthy and /or complicated contact with staff regarding the complaint, whether in person, in writing, or by telephone, whilst the complaint is being dealt with.

Where repeated attempts are made by a parent to raise the same complaint after it has been fully considered at all three stages of the Complaints Procedure, such correspondence will be deemed vexatious and will fall outside the scope of this procedure. The School reserves the right not to respond further to such complaints.

8. Use of Artificial Intelligence (AI) in Complaints

Parents may choose to use AI tools to help draft correspondence. While the School recognises that AI can support communication, it can also generate inaccurate, misleading or legally incorrect information. Where correspondence appears to have been produced using AI, the School may ask the parent to clarify the concern in their own words to ensure that the issues raised are understood accurately and can be addressed promptly.

9. Record-keeping, confidentiality and use of personal data

The School maintains a written record of all complaints, whether resolved at the informal stage (Stage 1), the formal stage (Stage 2), or following a Panel hearing (Stage 3). This record includes details of any actions taken by the School in response to each complaint, regardless of whether the complaint was upheld. All complaint records are retained in accordance with the School's Privacy Notice and the Information and Records Retention Policy.

All documentation relating to complaints is treated as confidential. However, the School may be required to disclose complaint records upon request from regulatory bodies such as the Independent Schools Inspectorate (ISI) or Ofsted. In such cases, the School will provide a written record of complaints received during any specified period, along with the corresponding actions taken.

In certain circumstances, the Secretary of State or an appointed inspector may request access to the substance of a complaint or associated confidential records. Disclosure may be necessary where there is a prevailing legal, regulatory, safeguarding, or data protection obligation - such as compliance with a subject access request - that overrides the School's duty to maintain confidentiality.

The School processes personal data in accordance with its Privacy Notice, available on the School's website. In the course of handling complaints, the School (including any Panel members appointed under Stage 3) may process a range of personal information, which may include but is not limited to:

- Names and contact details of the complainant and any individuals involved
- Correspondence and written submissions
- Witness statements (if appropriate)
- Meeting notes and investigation findings
- Records of decisions and actions taken
- Any relevant safeguarding or regulatory documentation

This may include 'special category personal data' (as further detailed in the School's Privacy Notice, 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 Privacy Notice.

Stage 3 Complaint Form

Please read the School's **Complaints Policy and Procedure** in full before completing this form. **This form is to be used in conjunction with Stage 3 of the procedure only.**

To be completed by those with parental responsibility[†] for a current pupil and returned to the Clerk of Governors, or if the complaint is against the Head, it should be directed to the Chair of Governors.

Your name(s)	
Name of pupil(s), year(s) and your relationship to them	
Contact address	
Contact telephone day	
Contact telephone mobile	
Contact email address	
Details of the complaint[‡]	
Action taken to date (including staff member(s) who has/have dealt with it so far) and solutions offered	

[†] Parental responsibility is defined in the Children Act 1989 as "*all rights, duties, powers and responsibilities and authority which by law **a parent** of a child has in relation to the child and his or her property*". It equates to legal responsibility for the child. If you have any doubts about whether you do or do not have parental responsibility for the child you may wish to seek legal advice.

[‡] Please provide details of the nature of your complaint. If you have more than one ground of complaint we suggest numbering them so that each is considered in turn. If you require more space you may wish to attach an additional page setting out your complaint.

The reason(s) that this was not a satisfactory resolution for you
What action(s) would you like to be taken to resolve your complaint?
Signature(s):
Date:
School use
Date acknowledgement sent:
By whom:
Complaint referred to:
Action taken:
Date: