



THE NORTON  
KNATCHBULL  
SCHOOL

*Things done well make the best memories*

**SIR NORTON KNATCHBULL – 1637**

# Complaints Policy & Procedure

Policy Owner	Ben Greene, HT
Reviewed by	Ben Greene, HT
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FGB	
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## **Rationale**

We aim to provide a high quality educational experience for every student, which not only provides good teaching, leading to good examination results, but also a rounded school experience with particular emphasis on personal development. We also recognise that, despite these aspirations and a strong record of success in most areas of the school's life, occasionally things can go wrong and parents or members of the public may need to make a complaint or raise concerns.

## **The difference between a concern and a complaint**

**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'.

It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaints procedure. The Norton Knatchbull School takes concerns and complaints seriously and will make every effort to resolve the matter as quickly as possible.

All formal complaints invoked under this policy will be recorded formally by the school in a central log by the Head's PA. It should be noted that school does not normally consider complaints made more than three months after the incident or situation.

This procedure does not apply to complaints about:

- Admissions & Exclusions;
- Curriculum;
- Special Educational Needs;
- Provision of Collective Worship and Religious Education;
- Allegations of bullying by pupils
- Allegations of abuse against staff
- Data protection

These are dealt with under separate procedures.

Equally, complaints by employees of the school are usually dealt with via the grievance procedure.

It is the school's intention that this Complaints Procedure will:

- encourage resolution of problems by informal means wherever possible;
- be simple to understand and use;
- be impartial;
- be non-adversarial;
- allow swift handling with established time-limits for action and keeping people informed of the progress;
- ensure a full and fair investigation by an independent person where necessary;
- respect where appropriate people's desire for confidentiality;
- address all the points at issue and provide an effective response and appropriate redress, where necessary;
- provide information to the senior management team so that services can be improved.

## **How to raise a concern or make a complaint**

A concern or complaint can be made in person, in writing or by telephone. They may also be made by a

third party acting on behalf of a complainant, so long as they have appropriate consent to do so.

Concerns can be raised with any member of staff, including the Headteacher. If the issue remains unresolved, the next step is to make a formal complaint.

Complainants should not approach individual governors to raise concerns or complaints. They have no power to act on an individual basis and it may also prevent them from considering complaints at Stage 2 of the procedure.

Complaints against school staff (except the Headteacher) should be made in the first instance, to Mr B. Greene (the Headteacher) via the Headteacher's PA. Please mark them as Private and Confidential.

Complaints that involve or are about the Headteacher should be addressed to the Chair of Governors, via the school office. Please mark them as Private and Confidential.

Complaints about the Chair of Governors, any individual governor or the whole governing body should be addressed to the Governance Professional via the school office. Please mark them as Private and Confidential.

For ease of use, a template complaint form is included at the end of this procedure. If you require help in completing the form, please contact the school office. You can also ask third party organisations like the Citizens Advice to help you.

In accordance with equality law, we will consider making reasonable adjustments if required, to enable complainants to access and complete this complaints procedure. For instance, providing information in alternative formats, assisting complainants in raising a formal complaint or holding meetings in accessible locations.

### **Anonymous complaints**

We will not normally investigate anonymous complaints. However, the Headteacher or Chair of Governors, if appropriate, will determine whether the complaint warrants an investigation.

An anonymous complaint will only be investigated in very limited and exceptional circumstances. Exceptional Circumstances typically include issues pertaining to Child Protection and bullying. In such cases, the school may either involve appropriate external agencies or conduct its own internal review to test whether there is any corroborative evidence which might trigger a formal investigation.

### **Time scales**

You must raise the complaint within three months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply. Exceptional Circumstances typically include issues pertaining to Child Protection and bullying.

### **Complaints received outside of term time**

We will consider complaints (Stage 1 or Stage 2) made outside of term time to have been received on the first school day after the holiday period.

### **Other agency involvement**

If other bodies are investigating aspects of the complaint, for example the police, local authority (LA) safeguarding teams or Tribunals, this may impact on our ability to adhere to the timescales within this procedure or result in the procedure being suspended until those public bodies have completed their investigations.

If a complainant commences legal action against The Norton Knatchbull School in relation to their complaint, we will consider whether to suspend the complaints procedure in relation to their complaint until those legal proceedings have concluded.

### **Resolving complaints**

At each stage in the procedure, The Norton Knatchbull School wants to resolve the complaint. If appropriate, we will acknowledge that the complaint is upheld in whole or in part. In addition, we may offer one or more of the following:

- an explanation
- an admission that the situation could have been handled differently or better
- an assurance that we will try to ensure the event complained of will not recur
- an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made
- an undertaking to review school policies in light of the complaint
- an apology.

### **Withdrawal of a Complaint**

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing.

### **The Stages of complaint**

As previously stated, - It is in everyone's interest that concerns and complaints are resolved at the earliest possible stage. Many issues can be resolved informally, without the need to use the formal stages of the complaints procedure.

## **INFORMAL STAGE**

Every effort will be made to resolve complaints or issues informally and quickly by discussion with the relevant member(s) of staff, as appropriate.

The school does however recognise that there may be circumstances in which:-

- it would be difficult for a particular complainant to discuss a complaint with a particular member of staff; or
- the member of staff directly involved feels too compromised to deal with the complaint.

In these cases, the complainant or member of staff can refer the complainant to another staff member (or, in the case of a complaint concerning the Headteacher, the chair of governors) for informal resolution. If in doubt, the Headteacher is always able to direct an informal complaint to the most appropriate recipient.

This discussion should make clear what the complaint(s) is/are, and what it is hoped that the preferred outcome should be. All complaints will be acknowledged within 5 School days, and a record kept – through emails being saved, or file notes of conversations.

When a meeting takes place, the member of staff will usually write notes during the meeting. If the complaint involves the actions or decisions of another member of staff, it is not usually appropriate to have that person present at the initial meeting. It is for the person responding to the complaint, or other senior manager, to address the issue with the member of staff about whom the complaint may be being made.

If informal procedures have not resolved the issue, the following formal stages should be followed:

## **STAGE 1**

Formal complaints must be made to the Headteacher (unless they are about the Headteacher), via the Headteacher's PA. This may be done in person, in writing (preferably on the Complaint Form, Annex 1), or by telephone. Where the complaint is made by telephone in the first instance Annex 1 will be completed by the school

The Headteacher will record the date the complaint is received and will acknowledge receipt of the complaint in writing (either by letter or email) within 5 school days. Where Annex 1 has been completed by the school, this will accompany the acknowledgement.

Within this response, the Headteacher will seek to clarify the nature of the complaint, ask what remains unresolved and what outcome the complainant would like to see. The Headteacher can consider whether a face-to-face meeting is the most appropriate way of doing this.

Note: The Headteacher may delegate the investigation to another member of the school's senior leadership team but not the decision to be taken.

During the investigation, the Headteacher (or investigator) will:

- if necessary, interview those involved in the matter and/or those complained of, allowing them to be accompanied if they wish
- keep a written record of any meetings/interviews in relation to their investigation.

At the conclusion of their investigation, the Headteacher will provide a formal written response within 10 school days of the date of receipt of the complaint.

If the Headteacher is unable to meet this deadline, they will provide the complainant with an update and revised response date.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions The Norton Knatchbull School will take to resolve the complaint.

The Headteacher will advise the complainant of how to escalate their complaint should they remain dissatisfied with the outcome of Stage 1.

If the complaint is about the Headteacher, or a member of the governing body (including the Chair or Vice-Chair), a suitably skilled governor will be appointed to complete all the actions at Stage 1.

Complaints about the Headteacher or member of the governing body must be made to the Clerk, via the school office.

If the complaint is:

- jointly about the Chair and Vice Chair or
- the entire governing body or
- the majority of the governing body

Stage 1 will be considered by an independent investigator appointed by the governing body. At the conclusion of their investigation, the independent investigator will provide a formal written response.

## **STAGE 2**

If the complainant is dissatisfied with the outcome at Stage 1 and wishes to take the matter further, they can escalate the complaint to Stage 2 – a meeting with members of the governing body's complaints committee comprising two School Governors and one independent member. All three panel members will have no prior knowledge of the contents of the complaint.

A request to escalate to Stage 2 must be made to the Clerk, via the school office, within 10 school days of receipt of the Stage 1 response.

The Clerk will record the date the complaint is received and acknowledge receipt of the complaint in writing (either by letter or email) within 5 school days.

Requests received outside of this time frame will only be considered if exceptional circumstances apply.

The Clerk will write to the complainant to inform them of the date of the meeting. They will aim to convene a meeting within 10 school days of receipt of the Stage 2 request. If this is not possible, the Clerk will provide an anticipated date and keep the complainant informed.

If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will decide when to hold the meeting. It will then proceed in the complainant's absence on the basis of written submissions from both parties.

The complaints committee will consist of at least three governors with no prior involvement or knowledge of the complaint. Prior to the meeting, they will decide amongst themselves who will act as the Chair of the Complaints Committee. If there are fewer than three governors from The Norton Knatchbull School available, the Clerk will source any additional, independent governors through another local school or through their LA's Governor Services team, in order to make up the committee. Alternatively, an entirely independent committee may be convened to hear the complaint at Stage 2.

The committee will decide whether to deal with the complaint by inviting parties to a meeting or through written representations, but in making their decision they will be sensitive to the complainant's needs.

If the complainant is invited to attend the meeting, they may bring someone along to provide support. This can be a relative or friend. Generally, we do not encourage either party to bring legal representatives to the committee meeting. However, there may be occasions when legal representation is appropriate. For instance, if a school employee is called as a witness in a complaint meeting, they may wish to be supported by union and/or legal representation.

Note: Complaints about staff conduct will not generally be handled under this complaints procedure. Complainants will be advised that any staff conduct complaints will be considered under staff disciplinary procedures, if appropriate, but outcomes will not be shared with them.

Representatives from the media are not permitted to attend.

At least 10 school days before the meeting, the Clerk will:

- confirm and notify the complainant of the date, time and venue of the meeting, ensuring that, if the complainant is invited, the dates are convenient to all parties and that the venue and proceedings are accessible
- request copies of any further written material to be submitted to the committee at least 5 school days before the meeting.

Any written material will be circulated to all parties at least 3 school days before the date of the meeting. The committee will not normally accept, as evidence, recordings of conversations that were obtained covertly and without the informed consent of all parties being recorded.

The committee will also not review any new complaints at this stage or consider evidence unrelated to the initial complaint to be included. New complaints must be dealt with from Stage 1 of the procedure.

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 must be sought before meetings or conversations take place. Consent will be recorded in any minutes taken.

The committee will consider the complaint and all the evidence presented. The committee can:

- uphold the complaint in whole or in part
- dismiss the complaint in whole or in part.

If the complaint is upheld in whole or in part, the committee will:

- decide on the appropriate action to be taken to resolve the complaint
- where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future.

The Chair of the Committee will provide the complainant and The Norton Knatchbull School with a full explanation of their decision and the reason(s) for it, in writing, within 15 school days.

The letter to the complainant will include details of how to contact the Department for Education if they are dissatisfied with the way their complaint has been handled by The Norton Knatchbull School

If the complaint is:

- jointly about the Chair and Vice Chair or
- the entire governing body or
- the majority of the governing body

Stage 2 will be heard by a committee of independent governors.

The response will detail any actions taken to investigate the complaint and provide a full explanation of the decision made and the reason(s) for it. Where appropriate, it will include details of actions The Norton Knatchbull School will take to resolve the complaint.

The response will also advise the complainant of how to escalate their complaint should they remain dissatisfied.

### **Next Steps**

If the complainant believes the school did not handle their complaint in accordance with the published complaints procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the Department for Education after they have completed Stage 2.

The Department for Education will not normally reinvestigate the substance of complaints or overturn any decisions made by The Norton Knatchbull School. They will consider whether The Norton Knatchbull School has adhered to education legislation and any statutory policies connected with the complaint.

The complainant can refer their complaint to the Department for Education online at: [www.education.gov.uk/contactus](http://www.education.gov.uk/contactus) by telephone on: 0370 000 2288 or by writing to:

Department for Education  
Piccadilly Gate  
Store Street  
Manchester  
M1 2WD.

### **Roles and Responsibilities**

The roles and responsibilities of individuals involved in a complaint are outlined in Annex 2.

### **Persistent and vexatious complaints**

These are defined and explained in Annex 3. This also sets out The Norton Knatchbull School response.



## Annex 1 - Complaint form

This is a Complaint Form intended to instigate Stage 1 of the Complaints Procedure, after attempts to resolve the concern informally have not provided you with a resolution you consider satisfactory.

Please complete and return to the Headteacher's PA, [headteacher@nks.kent.sch.uk](mailto:headteacher@nks.kent.sch.uk) who will acknowledge receipt and explain what action will be taken.

<b>Your name:</b>
<b>Pupil's name (if relevant):</b>
<b>Your relationship to the pupil (if relevant):</b>
<b>Address:</b>
<b>Postcode:</b>
<b>Day time telephone number:</b>
<b>Evening telephone number:</b>
<b>Please give details of your complaint, including whether you have spoken to anybody at the school about it.</b>

**What actions do you feel might resolve the problem at this stage?**

**Are you attaching any paperwork? If so, please give details.**

**Signature:**

**Date:**

**Official use**

**Date acknowledgement sent:**

**By who:**

**Complaint referred to:**

**Date:**

## **Annex 2      Roles and Responsibilities**

### **Complainant**

The complainant will receive a more effective response to the complaint if they:

- explain the complaint in full as early as possible
- co-operate with the school in seeking a solution to the complaint
- respond promptly to requests for information or meetings or in agreeing the details of the complaint
- ask for assistance as needed
- treat all those involved in the complaint with respect
- refrain from publicising the details of their complaint on social media and respect confidentiality.

### **Investigator**

The investigator's role is to establish the facts relevant to the complaint by providing a comprehensive, open, transparent and fair consideration of the complaint through:

- sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved
- interviewing staff and children/young people and other people relevant to the complaint
- consideration of records and other relevant information
- analysing information
- liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right.

The investigator should:

- conduct interviews with an open mind and be prepared to persist in the questioning
- keep notes of interviews or arrange for an independent note taker to record minutes of the meeting
- ensure that any papers produced during the investigation are kept securely pending any appeal
- be mindful of the timescales to respond
- prepare a comprehensive report for the Headteacher or complaints committee that sets out the facts, identifies solutions and recommends courses of action to resolve problems.

The Headteacher or complaints committee will then determine whether to uphold or dismiss the complaint and communicate that decision to the complainant, providing the appropriate escalation details.

### **Complaints Co-ordinator**

(this could be the Headteacher / or other designated member of the Senior Leadership team, or complaints governor or other staff member providing administrative support)

The complaints co-ordinator should:

- ensure that the complainant is fully updated at each stage of the procedure
- liaise with staff members, Headteacher, Chair of Governors, Clerk and LAs (if appropriate) to ensure the smooth running of the complaints procedure
- be aware of issues regarding:
  - sharing third party information
  - additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person
- keep records.

### **Governance Professionals**

The Governance Professional is the contact point for the complainant and the Committee where the complaint is investigated by the Governing Body and should:

- ensure that all people involved in the complaint procedure are aware of their legal rights and duties, including any under legislation relating to school complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR)
- set the date, time and venue of the meeting, ensuring that the dates are convenient to all parties (if they are invited to attend) and that the venue and proceedings are accessible
- collate any written material relevant to the complaint (for example, stage 1 paperwork, school and complainant submissions) and send it to the parties in advance of the meeting within an agreed timescale
- record the proceedings
- circulate the minutes of the meeting
- notify all parties of the committee's decision.

### **Committee Chair**

The committee's chair, who is a Governor nominated in advance of the complaint meeting, should ensure that:

- both parties are asked (via the Governance Professional) to provide any additional information relating to the complaint by a specified date in advance of the meeting
- the meeting is conducted in an informal manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy
- complainants who may not be used to speaking at such a meeting are put at ease. This is particularly important if the complainant is a child/young person
- the remit of the committee is explained to the complainant
- written material is seen by everyone in attendance, provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR.
- If a new issue arises it would be useful to give everyone the opportunity to consider and comment upon it; this may require a short adjournment of the meeting
- both the complainant and the school are given the opportunity to make their case and seek clarity, either through written submissions ahead of the meeting or verbally in the meeting itself
- the issues are addressed
- key findings of fact are made
- the committee is open-minded and acts independently
- no member of the committee has an external interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- the meeting is minuted
- they liaise with the Governance Professional (and complaints co-ordinator).

### **Committee Members**

Committee members should be aware that:

- the meeting must be independent and impartial, and should be seen to be so
- No governor may sit on the committee if they have had a prior involvement in the complaint or in the circumstances surrounding it.
- the aim of the meeting should be to resolve the complaint and achieve reconciliation between the school and the complainant

We recognise that the complainant might not be satisfied with the outcome if the meeting does not find

in their favour. It may only be possible to establish the facts and make recommendations.

- many complainants will feel nervous and inhibited in a formal setting
- Parents/carers often feel emotional when discussing an issue that affects their child.
- extra care needs to be taken when the complainant is a child/young person and present during all or part of the meeting

Careful consideration of the atmosphere and proceedings should ensure that the child/young person does not feel intimidated.

The committee should respect the views of the child/young person and give them equal consideration to those of adults.

If the child/young person is the complainant, the committee should ask in advance if any support is needed to help them present their complaint. Where the child/young person's parent is the complainant, the committee should give the parent the opportunity to say which parts of the meeting, if any, the child/young person needs to attend.

However, the parent should be advised that agreement might not always be possible if the parent wishes the child/young person to attend a part of the meeting that the committee considers is not in the child/young person's best interests.

- the welfare of the child/young person is paramount.

## **Annex 3 – Persistent and vexatious complaints**

### **1. Introduction**

1.1 Dealing with a complaint ought to be a straightforward process, but in a minority of cases, people pursue their complaints in a way, which can either impede the investigation of their complaint or can have significant resource issues for the school. This can happen either while their complaint is being investigated, or once the school has finished dealing with the complaint.

1.2 We are committed to dealing with all complaints equitably, comprehensively, and in a timely manner.

1.3 We will not normally limit the contact which complainants have with the school.

1.4 We do not expect staff to tolerate unacceptable behaviour by complainants.

Unacceptable behaviour includes behaviour which is abusive, offensive or threatening and may include:-

- Using abusive or foul language on the telephone
- Using abusive or foul language face to face
- Using abusive or foul language in written correspondence
- Sending multiple emails
- Leaving multiple voicemails
- Entering the school without an appointment and behaving in a threatening and/or abusive manner

1.5 We will take action to protect staff from such behaviour. If a complainant behaves in a way that is unreasonably persistent or vexatious, we will follow this policy.

1.6 Raising legitimate queries or criticisms of a complaints procedure as it progresses, for example if agreed timescales are not met, should not in itself lead to someone being regarded as a vexatious or an unreasonably persistent complainant.

1.7 Similarly, the fact that a complainant is unhappy with the outcome of a complaint and seeks to challenge it once, or more than once, should not necessarily cause him or her to be regarded as vexatious or unreasonably persistent.

## **2. Aims**

2.1 The aim of this annex is to contribute to our overall aim of dealing with all complainants in ways which are demonstrably consistent, fair and reasonable.

2.2 It sets out how we will determine which complainants will be treated as vexatious or unreasonably persistent, and what we will do in those circumstances. The policy is for the information of staff, parents/guardians.

2.3 In order to ensure that the policy remains flexible for future situations which may occur outside of the current detail, the school retains the right to amend the policy accordingly on a yearly basis.

## **3. Definitions**

3.1 We have adopted the Local Government Ombudsman's (LGO) definition of "unreasonable complainant behaviour" and "unreasonable persistent complaints"

3.2 We define unreasonably persistent and vexatious complainants as those complainants who, because of the frequency or nature of their contacts with the school, hinder the provision of our services, or our consideration of their or other people's complaints. The description 'unreasonably persistent' and 'vexatious' may apply separately or jointly to a particular complainant.

3.3 Examples include the way or frequency that complainants raise their complaint with staff, or how complainants respond when informed of our decision about the complaint.

3.4 Features of an unreasonably persistent and/or vexatious complainant are included in section 6, below. The list is not exhaustive, nor does one single feature on its own necessarily imply that the person will be considered as being in this category.

## **4. Imposing restrictions**

4.1 We will ensure that the complaint is being, or has been, investigated properly according to the school's complaints procedures, but in circumstances where unreasonable complainant behaviour is present, restrictions may be imposed as set out below.

4.2 In the first instance the member of the staff who is experiencing issues with a complainant will consult with the Headteacher.

4.3 The Headteacher will contact the complainant in writing or by email to explain why this behaviour is causing concern, and ask them to change this behaviour. They will explain the actions that the school

may take if the behaviour does not change. Restrictions will be tailored to deal with the individual circumstances of the complainant. Examples of possible restrictions are outlined in section 7 below.

4.4 Any restriction that is imposed on the complainant's contact with us will be appropriate and proportionate. In most cases restrictions will apply for between 3 and 6 months, but may be extended in exceptional cases.

4.5 Where the behaviour is so extreme or it threatens the immediate safety and welfare of staff, and or other individual, we will consider other options, for example reporting the matter to the police or taking legal action. In such cases, we may not give the complainant prior warning of that action.

## **5. Record keeping**

5.1 Records will be retained by the Headteacher's PA including:

- The name and address of each complainant who is treated as abusive, vexatious or persistent
- When the restriction came into force and ends
- What the restrictions are

## **6. Features of an unreasonably persistent and/or vexatious complainant**

An unreasonably persistent and/or vexatious complainant may:

1. Have insufficient or no grounds for their complaint and be making the complaint only to annoy (or for reasons that he or she does not admit or make obvious)
2. Refuse to specify the grounds of a complaint despite offers of assistance
3. Refuse to co-operate with the complaints investigation process while still wishing their complaint to be resolved
4. Insist on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice (insisting, for instance, that there must not be any written record of the complaint)
5. Make what appear to be groundless complaints about the staff dealing with the complaints, and seek to have them dismissed or replaced
6. Make an unreasonable number of contacts with us, by any means in relation to a specific complaint or complaints
7. Make persistent and unreasonable demands or expectations of staff and/or the complaints process after the unreasonableness has been explained to the complainant (an example of this could be a complainant who insists on immediate responses to numerous, frequent and/or complex letters, telephone calls or emails)
8. Discriminate, harass, victimise, verbally abuse or otherwise seek to intimidate staff dealing with their complaint, in relation to their complaint by use of foul or inappropriate language, or by the use of offensive terms and derogatory language (e.g. racist, homophobic, misogynistic, transphobic etc.)
9. Raise subsidiary or new issues whilst a complaint is being addressed that were not part of the complaint at the start of the complaint process
10. Introduce trivial or irrelevant new information whilst the complaint is being investigated and expect this to be taken into account and commented on
11. Change the substance or basis of the complaint without reasonable justification whilst the complaint is being addressed
12. Deny statements he or she made at an earlier stage in the complaint process
13. Electronically record meetings and conversations without the prior knowledge and consent of the other person involved

14. Adopt an excessively 'scattergun' approach, for instance, pursuing a complaint or complaints not only with the school, but at the same time with the council, other councils, elected councillors the police, solicitors, and the Local Government Ombudsman.
15. Refuse to accept the outcome of the complaint process after its conclusion, repeatedly arguing the point, complaining about the outcome, and/or denying that an adequate response has been given
16. Make the same complaint repeatedly, perhaps with minor differences, after the complaints procedure has been concluded, and insist that the minor differences make these 'new' complaints which should be put through the full complaints procedure
17. Persistently approach the school through different routes about the same issue
18. Persist in seeking an outcome which we have explained is unrealistic for legal or policy (or other valid) reasons
19. Refuse to accept documented evidence as factual
20. Complain about or challenge an issue based on a historic and irreversible decision or incident
21. Combine some or all of these features

### **7. Examples of Restrictions that could be applied**

An unreasonably persistent and/or vexatious complainant may be:

1. Advised that contact by telephone except through a third party e.g. solicitor/councillor/friend acting on their behalf, will not be accepted by the school.
2. Advised that emails to individual and/or all school will not be responded to, and insisting that all correspondence should be by letter.
3. Advised that they will not be allowed access to the school site unless requested to do so.
4. Advised that their contact with the school is to take place with one named member of staff only.
5. Advised that telephone calls will be restricted to specified days/times/duration, as is appropriate
6. Advised that any personal contact will take place in the presence of an appropriate witness.
7. Advised we will not reply to, or acknowledge any further contact from them on the specific topic of that complaint (in this case, a designated member of staff should be identified who will read future correspondence).

## NKS Equality Impact Assessment

The purpose of the Equality Impact Assessment (EIA) is to ensure that policies, functions, plans or decisions do not create unnecessary barriers for people protected under the Equality Act 2010. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised.

**THIS POLICY WILL AFFECT:** Pupils, Parents, Staff & Governors

**EIA completed by:** Lena Seed, Governance & Compliance Professional

**Date completed:** June 2025

### Impact analysis

GROUP	POSITIVE IMPACT	NEUTRAL IMPACT	NEGATIVE IMPACT	WHY WILL THE POLICY HAVE THIS EFFECT?
Sex		✓		The policy applies equally and impartially to all individuals, regardless of sex.
Race		✓		The policy provides fair procedures for all complainants and includes a mechanism to request support or adjustments if needed.
Religion or belief		✓		The policy is neutral regarding religion or belief and ensures reasonable adjustments where relevant.
Sexual orientation		✓		The policy applies equally and does not make any distinctions based on sexual orientation.
Gender reassignment		✓		Inclusive language is used and there are no barriers identified for those with protected characteristics under gender reassignment.
Pregnancy or maternity		✓		Complaints may be submitted in any format; flexibility is built in to allow for participation regardless of maternity status.
Age		✓		The policy applies equally regardless of age; child complainants are considered and supported where appropriate.
Disability	✓			The policy explicitly offers reasonable adjustments, including alternative formats and accessible venues, ensuring positive access for disabled individuals.
Marriage or civil partnership		✓		The policy has no differential impact on individuals based on marital or partnership status.
English as an additional language	✓			Support is available for individuals requiring help completing forms or understanding the policy; interpreters can be accessed if necessary.
Looked-after children	✓			The policy accommodates third-party representation and additional safeguarding considerations if needed.
Families with separated parents	✓			The policy allows for complaints to be raised by multiple individuals acting on behalf of the same pupil, with appropriate permissions and confidentiality safeguards.

## **INTERSECTIONAL IMPACT**

No negative intersectional impacts identified. Positive support mechanisms are available to mitigate barriers where multiple characteristics may intersect.

## **CONSULTATION AND STAKEHOLDER ENGAGEMENT**

This policy is reviewed and approved by the Education Committee. No additional consultation required.

## **FINAL DECISION ON POLICY**

No changes to the content of the Complaints Policy were required as a result of the Equality Impact Assessment.

## **MONITORING ARRANGEMENTS**

Complaints and associated equality considerations will be monitored annually by the Senior Leadership Team, with oversight by the Education Committee.