City of London Complaints Policy and Procedure for Pupils and Parents

0. Review of Policy

0.1 This policy is reviewed annually, or more regularly as required, prior to approval by governors.

Last reviewed by:	Mark Wardrop (Senior Deputy Head)
Date last reviewed:	November 2025
Approved for Governors:	Board of Governors
Date last approved:	3 December 2025

1. Introduction

1.1 This Complaints policy and procedure for pupils and parents ('Complaints procedure') is for the benefit of pupils[1], and parents of pupils[2], at City of London School ('the School'). This policy and procedure will be relied upon in respect of **all complaints** by parents and pupils made against the School **except in respect of**:

a) **child protection allegations** where a separate policy and procedure applies[3];
b) **expulsions (including required removals)** where a separate policy and procedure applies[4];
c) **appeals relating to internal assessment decisions for external qualifications** where a separate appeals procedure applies[5].

1.2 Complaints made by members of the public (who are not pupils or parents of pupils) about the School will normally be dealt with under the City of London Corporation's Complaints Procedure, though this procedure may be followed at the discretion of the School.

1.3 The School expects that most concerns can be resolved informally, and it will use its best endeavours to resolve any complaints that are made or any concerns that are raised on that basis. If informal procedures fail to resolve the issue, a formal complaint about any matter not relating to the exceptions above must be stated courteously in writing to the Head and will then be dealt with under this policy and procedure. Every complaint shall receive fair and proper consideration and a timely response.

1.3 This policy and procedure is available on request to pupils and parents of pupils and prospective pupils of the School (although parents of prospective pupils are not entitled to

[1] Including former pupils, if the complaint was initially raised when the pupil was still registered as a pupil at the School.
[2] Parents include anyone who has parental responsibility for the pupil.
[3] See the School's Safeguarding and Child Protection Policy.
[4] See the School's Procedure for the Review of a Pupil's Required Removal.
[5] See the School's Academic Dishonesty Policy.

use the policy and procedure) and is published on the School's website. While pupils may themselves raise concerns and complaints under this policy and procedure, the School will generally involve parents should this occur.

1.5 This policy and procedure in no way overrides the right of the School to act in accordance with the School's Terms and Conditions agreed by parents upon enrolment of their child as a pupil in the School, although parents are not prevented from raising concerns or complaints in accordance with this policy and procedure where they are of the reasonable view that the School has not acted in accordance with the School's Terms and Conditions.

1.6 **Parents can be assured that all complaints and expressions of concern[6], whether raised informally or formally, will be treated seriously.**

1.7 This policy has regard to Part 7 (Manner in which complaints are to be handled), Paragraph 33 (Complaints) of the Independent School Standards Regulations.

2. Complaints Procedure Stage One: Informal Resolution

2.1 It is hoped that most concerns and complaints will be resolved quickly and informally.

2.2 If parents have a complaint, they should normally contact their son's Form Tutor in the first instance. Complaints should be raised in a manner which is courteous and respectful. The receipt of a complaint will be acknowledged by the recipient, normally within twenty-four (24) hours during term time or as soon as reasonably possible during the School holidays. In many cases, the matter will be resolved to the parents' satisfaction straightaway by this means. If the Form Tutor cannot resolve the matter alone, it may be necessary for them to consult with a Head of Department or Head of Year, a member of the School's Senior Management Team (SMT), the Senior Deputy Head or the Head.

2.3 Complaints made directly to a Head of Department or Head of Year, a member of the SMT, the Senior Deputy Head or the Head will usually be referred to the relevant Form Teacher unless the Head of Department or Head of Year, a member of the SMT, the Senior Deputy Head or the Head deems it appropriate to deal with the matter personally.

2.4 The School will use its reasonable endeavours to resolve any informal concerns of complaints within five (5) term-time days of them being raised, except where they are raised in school holidays, or within two (2) term-time days of the commencement of those holidays, where the School will use its reasonable endeavours to resolve them as soon as possible after commencement of the new school term (usually within five (5) term-time days).

2.5 Should the matter not be resolved as referred to above, or in the event that the Form Tutor and the parents fail to reach a satisfactory resolution, then parents will be advised to proceed with their complaint in accordance with Stage Two (Formal Resolution) of this procedure.

[6] To be clear, the School makes no distinction between a 'concern' and a 'complaint': both shall be handled in line with this policy and procedure.

3. Complaints Procedure Stage Two: Formal Resolution

3.1 If the concern or complaint cannot be resolved on an informal basis, as set out in Stage One (Informal Resolution) of this procedure, then parents should put their complaint in writing to the Head within five (5) term-time days of the date of the School's decision made in Stage One; this complaint should be expressed clearly and courteously. The receipt of a complaint will be acknowledged by the Head, normally within twenty-four (24) hours during term time or as soon as reasonably possible during the School holidays. Parents should also identify how they wish their complaint to be resolved – the School may contact parents to clarify this before proceeding further

3.2 The Head will decide, after considering the complaint, the appropriate course of action to take. This may include delegating the consideration (and, as relevant, further investigation) of the complaint to another senior member of staff not so far involved with the complaint ("the Delegated Person"). This may be the Senior Deputy Head or another Deputy Head.

3.3 In many cases, the Head or the Delegated Person will speak to or meet with the parents concerned to discuss the matter. When required, the Head or the Delegated Person will use reasonable endeavours to speak to or meet with the parents within five (5) term-time days of the formal complaint being received, except where the complaint is received in school holidays or within two (2) term-time days prior to the commencement of those holidays, where the Head or Delegated Person will use reasonable endeavours to speak or meet with parents as soon as possible after the commencement of the subsequent school term (usually within five (5) term-time days).

3.4 If possible, a resolution will be reached at this stage.

3.5 Where further investigation is necessary, this will begin as soon as possible. This can include interviews with staff, pupils or other relevant people. If the investigation uncovers any concerns relating to safeguarding, then these will be investigated in accordance with the School's safeguarding policies and procedures. The Head (or Delegated Person) may work with other members of the SMT, or with Heads of Department or Heads of Year, as appropriate, in investigating the complaint.

3.6 The Head or Delegated Person will keep a written record of all meetings and interviews held in relation to the complaint.

3.7 Once the Head or Delegated Person is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made. Parents will be informed of this decision in writing, giving reasons for the decision. The written decision should, where possible, be provided no later than five (5) term-time days after the Head (or Delegated Person) speaking to, or meeting with, parents to discuss the matter (in accordance with paragraph 3.3 above), unless it is not reasonably practicable to complete any further investigations and make the decision within this timeframe, in which case parents will be notified, and a revised timeframe provided. The Head or Delegated Person may also arrange to meet with parents to explain the decision.

3.8 The School will keep a written record of all formal complaints, including records of meetings and interviews held in relation to the complaint, and the School's decision. These records will be kept for one (1) year after the pupil leaves the School.

3.9 Where parents are not satisfied with the School's response to their complaint under Stage Two (Formal Resolution) of this procedure, they have the opportunity to have their complaint considered by an independent Complaints Panel in accordance with Stage Three (Panel Hearing) of this procedure.

4. Complaints Procedure Stage Three: Panel Hearing

4.1 If parents seek to invoke Stage Three (Panel Hearing) following failure to reach an earlier resolution and where not satisfied with the Head's decision in response to their complaint under Stage Two (Formal Resolution) of this procedure, the parents may request that their complaint be further considered by an independent Complaints Panel ('the Panel') set up for this purpose.

4.2 This request for further assessment of the complaint will, for the purposes of this Procedure, be known as an 'appeal'.

4.3 Parents must lodge their appeal in writing, addressed to the Chair of Governors c/o the School, within ten (10) term-time days of the date of the School's decision made in accordance with Stage Two (Formal Resolution) of this procedure. The receipt of a complaint will be acknowledged by the recipient, normally within twenty four (24) hours during term time and as soon as reasonably possible during the school holidays. The parents should provide full details of their complaint(s) made against the School and which they believe to have been resolved unsatisfactorily by Stage Two (Formal Resolution) of this Complaints procedure, along with the remedies sought in respect of each. The Panel is only obliged to consider the complaint(s) lodged in this 'initial submission' although they may use their discretion to consider other relevant and related matters that may subsequently arise.

4.4 Where an appeal is received by the School, the School will, within two (2) term-time days, refer the matter to the Town Clerk (Clerk to the Board of Governors), who will act as Clerk to the Panel. Where the appeal is received by the School during school holidays, or within two (2) term-time days prior to the commencement of those holidays, the School will, within two (2) term-time days upon commencement of the subsequent school term, refer the matter to the Town Clerk.

4.5 The Clerk provides an independent source of advice on procedure for all parties.

4.6 Once an appeal has been received by the Clerk, the Clerk will acknowledge the appeal in writing within two (2) term-time days, and inform the parents of the steps involved in this Complaints Procedure.

4.7 The Clerk will then make provision for a hearing before an independent Panel, appointed by or on behalf of the Board of Governors, to consider the matter as soon as possible,

normally no later than twenty (20) term-time days, after receipt by the School of parents' written notice that they wish to invoke Stage Three (Panel Hearing) of this procedure, dependent upon the availability of the Panel members.

4.8 The independent Complaints Panel will consist of at least three people who were not directly involved in the matters detailed in the complaint, including two governors from the School's Board of Governors and one person independent of the management and running of the School. This latter person should not only be independent of the management and running of the School (so, not a member of the School's workforce and not a member of the Board of Governors) but should also not be otherwise involved in the management of the School. For example, an individual (such as a solicitor) who might be regularly contracted to act for the School could not be the independent member of the Complaints Panel. The process used for selecting an independent person will conform to relevant guidance issued by the Department for Education:

"Our general view is that people who have held a position of responsibility and are used to scrutinising evidence and putting forward balanced arguments would be suitable. Examples of persons likely to be suitable are serving or retired business people, civil servants, heads or senior members of staff at other schools, people with a legal background and retired members of the Police Force might be considered."

4.9 A hearing should take place unless the parent later indicates that they are now satisfied and do not wish to proceed further. The hearing should, therefore, proceed not withstanding that the parent may subsequently decide not to attend. If necessary, the panel should consider the parent's complaint in their absence and in conformity with the process set out in this Complaints Policy, and issue findings on the substance of the complaint, thereby bringing the matter to a conclusion. The requirement for the panel to proceed does not prevent the School from accommodating parental availability for dates or considering comments concerning panel composition.

4.10 The following are entitled to attend a hearing, submit written representations and address the Panel:

a) The parent(s) (and, if aged 16 or over, the pupil), who may be accompanied by one other person, usually a friend or relative;
b) The Head, who may be accompanied by the Delegated Person (if relevant) or another colleague; and
c) Any other interested person whom the Panel considers to have a reasonable and just interest in the appeal and whose contribution would assist the Panel in their decision-making.

Legal representation will not normally be appropriate and the provision set out above for a parent to be accompanied at a Panel hearing does not confer the right on a parent to have a legal representative to make representations on their behalf at the hearing.

4.11 Where 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. In such cases all parties will be given the opportunity to submit written evidence to the Panel in support of their position, including:

a) documents in support of complaint(s);
b) chronology and key dates relating to complaint(s); and
c) written submission(s) setting out the complaint(s) in more detail.

This evidence will be considered by the Panel, along with the initial submission that was lodged by the parents.

4.12 Evidence will be initially sent to the Clerk, who will then circulate the documentation to all parties, including the Panel members, along with an order of proceedings. All written evidence must be received by the Clerk no later than ten (10) term-time days in advance of the hearing. The Clerk will distribute the written evidence to the relevant parties no later than five (5) term-time days in advance of the Panel hearing.

4.13 It is for the Panel to decide how to conduct the proceedings of the appeal, which should be reasonably informal so that all parties can present their case effectively. If possible, the Panel will resolve the parents' complaint(s) immediately without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out.

4.14 After due consideration of all the facts they consider relevant, the Panel will reach a decision as to whether to uphold or reject the complaint, and may make recommendations, which it shall complete within five (5) term-time days of the hearing. The decision reached by the Panel is final, although any recommendations which may have financial implications for the School may be subject to formal approval from the relevant authorities (e.g. the Board of Governors).

4.15 The Panel's findings and any recommendations will be sent by the Clerk in writing to the parents (the complainant), the Head, the Governors and, where relevant, the person complained about. The letter will state any reasons for the decision reached and recommendations made by the Panel. These findings and recommendations will be sent by electronic mail or otherwise, within five (5) term-time days of the Panel reaching its decision. Details of the findings and recommendations will be retained in School as described in the *Provision of Information* section.

4.16 Where repeated attempts are made by a parent, or carer or other associated individual 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 this policy.

5. Provision of information

5.1 The School will keep a written record of all complaints that are made under Stage Two (Formal Resolution) and Stage Three (Panel Hearing) of this procedure, with details of:

a) Whether they are resolved following a formal procedure (at Stage Two of this procedure), or proceed to a Panel Hearing (Stage Three); and
b) Action taken by the School as a result of these complaints, including decisions and recommendations of the Panel, regardless of whether the complaint(s) are upheld.

This record, including details of the findings and recommendations, will be made available for inspection on the school's premises by the Head and Governors. This record will be retained for one (1) year after the pupil leaves the School.

5.2 All correspondence, statements and records relating to individual complaints will 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).

5.3 Information regarding the number of complaints made under Stage Two (Formal Resolution) or Stage Three (Panel Hearing) of this procedure may be requested from the Head's EA. The Head's EA may be contacted at HeadEA@cityoflondonschool.org.uk).

Appendix 1: Timescales for handling a complaint

'Days' here refer to working days during school term time (i.e. term-time days).

	Acknowledgement of receipt of complaint	**Initial response by School / hearing**	**Decision**
Informal (Stage One)	1 day (normally)	5 days from receipt of complaint	Included in the initial response
Formal (Stage Two)	1 day (normally)	5 days from receipt of complaint	5 days after hearing
Panel (Stage Three)	4 days	20 days from receipt of complaint	10 days after hearing