COMPLAINTS PROCEDURE

Author/reviewer responsible:	RO'B	ISI document code:	NA
Reviewed by:	SMT	Last amended:	November 2025
Authorisation by resolution of:	Governors	Date of authorisation:	May 2026
		Date of next review:	May 2027

Introduction

WCCS will treat a complaint with care and in accordance with this Complaints Procedure.

WCCS makes its Complaints Procedure available to all parents of pupils and of prospective pupils on the School's website and in the School office during the School day, and WCCS will ensure that parents of pupils and of prospective pupils who request it are made aware that this document is published or available and of the form in which it is published or available, and of the number of complaints registered under the formal procedure during the preceding School year. In accordance with paragraph 32(1) of Schedule 1 to the Education (Independent School Standards) Regulations 2014, WCCS will also make available, on request, to 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.

Although this Procedure is made available to parents of prospective pupils, it is not available for use by them; it may only be used by parents of current pupils. It may also be used by pupils who are current boarders to raise their own complaints about boarding provision.

Complaints by parents of former pupils will be dealt with under this Complaints Procedure only if the complaint was initially raised when the pupil to which the complaint relates was still registered as a pupil at the School. The only exception to this is if the complaint is a review of a decision taken by the Head to exclude or require the removal of a pupil under clause 4 of the School's Terms and Conditions in which case such a review must be requested by no later than five working days from the date of the decision to exclude or require the removal of a pupil.

The School will be mindful of its obligations under the Equality Act 2010 in the application of this policy.

Although the School endeavours to manage complaints in an open and transparent manner, parents should be aware that there may be circumstances which mean the School is unable to share complete details about how a complaint has been handled by the School, the evidence collated, steps taken in response or other related matters. This could be the case even when a complaint is upheld. For example, this may be because such information constitutes sensitive third-party data (for example belonging to a staff member, pupil or other parent), legal or regulatory requirements prohibit disclosure, or withholding information is in accordance with specific instructions from a statutory agency. This list is not exhaustive.

"Parent(s)" means the holder(s) of parental responsibility for a current pupil about whom the complaint relates.

Boarding

The School's complaints procedure complies with Standard 18 of the National Minimum Standards for Boarding Schools. The ISI is the regulatory body which now inspects Boarding Schools. Boarders have a complaints procedure that is publically available on a noticeboard in the boarding house phone booth.

Third parties

In the event of complaints relating to members of the Cathedral Music Department, these will be referred to the Cathedral Administrator and Head of HR who will instigate the Diocesan complaints procedure. Complaints which raise safeguarding concerns will be referred both to the Cathedral Safeguarding Representative and to the School's Designated Safeguarding Lead who will refer it to the Westminster LADO where it meets the threshold for referral. Whilst decisions around suspension are decisions for the Cathedral to take, it is entirely within the School's discretion whether to permit or prohibit the individual concerned from having contact with its pupils whilst any safeguarding referral or investigation is underway, and indeed – depending on the outcome of any referral or investigation – thereafter. If a decision is made to investigate which requires speaking to a pupil, this will be done in conjunction with school staff. The outcome of any complaint will be referred back to the Head Master and the parent concerned. A similar process will be followed with any other third party provider where the parental complaint relates to a member of their staff.

What Constitutes a Complaint?

A complaint is an expression of dissatisfaction with a real or perceived problem. It may be made about the School as a whole, about a specific department or about an individual member of staff, and any matter about which a parent is unhappy and seeks action by the School is within the scope of this procedure. 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.

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 Three-Stage Complaints Procedure

Stage 1 – Informal Resolution

- It is hoped that most complaints and concerns will be resolved quickly and informally.
- If parents have a complaint, they should normally contact their child's form teacher. If the form teacher cannot resolve the matter alone it may be necessary for them to consult a head of department or member of the SMT.
- The form teacher, head of department of member of the SMT will make a written record of all concerns and complaints and the date on which they were received. Should the matter not be resolved **within 10 working days** or if the form teacher, head of department or member of the SMT and the parent fail to reach a satisfactory resolution

then parents will be advised to proceed with their complaint in accordance with Stage 2 of this Complaints 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 Office on request.

Stage 2 – Formal Resolution

- If the complaint cannot be resolved on an informal basis then the parents should put their complaint in writing, **within 10 working days**, to the Head. The Head may require further information from the parents to help clarify the scope and nature of their concerns. 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 (or their nominee) will meet the parents concerned, **within 10 working days** of receiving the complaint, to discuss the matter. If possible, a resolution will be reached at this stage. It may be necessary for further investigations to be carried out. The Head (or their nominee) will determine who should carry out any investigation and this may be someone external to the School.

- **Written records** will be kept of all formal meetings and interviews held in relation to the complaint.

- In the case of complaints which raise issues of safeguarding children or vulnerable adults, the School's safeguarding procedures will be followed.

- Once the Head (or their nominee) 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 (or their nominee) will also give reasons for their decision. In most cases, the Head (or their nominee) will make their decision and provide the parents with reasons within 20 working days of the complaint being put in writing (or following the provision of any further clarificatory information about the complaint to the Head, if so requested).

- 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 should proceed to Stage 3 of this procedure.

Stage 3 – Panel Hearing

- 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 **within 5 working days** of receiving the decision at Stage 2, setting out their grounds of appeal. Any supporting

evidence which the parents wish to rely on should also be provided with their grounds of appeal. 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 Governors, 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 Chair of Governors will select the Complaints Panel. 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 Chair of Governors will appoint one Panel member to act as Chair of the Panel. The Clerk to the Governors, on behalf of the Panel, will then acknowledge the complaint **within 5 working days** and schedule a hearing to take place as soon as practicable and normally **within 14 working days**.

- If the Panel or convenor/clerk to the Panel deems it necessary, they 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 identity of the companions should be confirmed to the Clerk to the Governors as soon as possible and by no later than **2 working days** before the hearing. The Panel will decide whether it would be helpful for witnesses to attend.

- A note-taker will attend the hearing to take a summary note. This will not be a verbatim note but an accurate summary of what was discussed. Notes of the hearing will be shared with attendees as soon as practicable after the hearing. To the extent there is any disagreement about the content of those notes or further comments from the parties, these will be considered by and, where possible, resolved by the Chair. A copy of any comments on the notes will be appended to the notes.

- 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 for the School to consider.

- Stage 3 Panels cannot require that any financial compensation is paid to parents, cannot waive any fees in lieu of notice or other outstanding debts or fees owed to the School, or otherwise obligate the School to take particular steps.

- The Panel will write to the parents informing them of its decision and the reasons for it, **within 10 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.

- Any complaint about a decision taken by the Head to exclude or require the removal of the pupil under clause 4 of the School's Terms and Conditions will be governed by this Stage 3 of the School's Complaints Procedure. There may be circumstances in which the School consider it necessary and appropriate to deviate from the Stage 3 procedure in the context of appeals for exclusion and required removal, and the School will inform the parents of this. In such circumstances, the Panel may only uphold the complaint and ask the Stage 2 decision-taker to reconsider their decision if they consider, having regard to the process followed by the Head, that the Head's decision to exclude / require the removal of the pupil was not a reasonable decision for the Head to have taken.

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 the first two stages of the procedure **within 28 working days**. Stage 3, the Appeal Panel Hearing, will be completed **within a further 28 working days**.

Please note that, for the purposes of this procedure, **working days** refers to weekdays (Monday to Friday) during term time, 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 also take longer to resolve a complaint during periods of significant disruption to School life or as a consequence of unavoidable staff absence, however deviation from the normal timescale for resolving a complaint during term time will only occur on an exceptional basis, and the School will take all reasonable steps to limit any such delay. The School expects parents to engage in the process in a reasonable, constructive and responsive manner to help ensure matters can be dealt with in a timely way and in line with the targets set out in this Procedure.

Persistent correspondence

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.

Recording Complaints and use of personal data

Following resolution of a complaint, the School will keep a written record of all formal complaints, whether they are resolved at the 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
- 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, 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 and Data Protection Policy.

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 and Data Protection. 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.