



HARROW
INTERNATIONAL
SCHOOL

APPI • JAPAN

EXTERNAL COMPLAINTS & APPEALS POLICY

OCTOBER 2026



1 PURPOSE OF THIS GUIDE

- 1.1 This document sets out the principles and procedures regarding complaints by external stakeholders against Harrow Appi. The audience for this policy includes:
- Parents making a complaint
 - External stakeholders making a complaint
 - Harrow International staff managing external complaints

It does not relate to internal complaints between members of staff, for which a separate policy document exists.

- 1.2 It is anticipated that this policy, and then only in sections as relevant, will be shared with complainants only at the point that their complaint has moved beyond informal proceedings. Senior managers may wish to share the graphic in APPENDIX 2 with the complainant if they feel this is necessary after the first contact is made.

- 1.3 The complaints process is divided into three stages:

STAGE	DESCRIPTION
I. Informal	Informal raising of a concern notified orally or in writing to a senior manager.
II. Formal	A formal complaint made in writing to the Head.
III. Review	An unresolved formal complaint, progressed as a last resort to the Board of Governors

- 1.4 Complaints against the Head personally (as opposed to against other school members of staff, school policy or procedures) are accelerated directly to Stage III. Safeguarding concerns should be notified immediately to the Designated Safeguarding Lead (see *Safeguarding and Child Protection Policy*).

2 DEFINITIONS: A CONCERN OR A COMPLAINT

- 2.1 The school defines a **concern** as:
'An expression of worry or doubt over an issue considered to be important for which reassurances are sought'.
- 2.2 In the first instance, community members are encouraged to raise concerns with their child's form tutor, the appropriate Senior Leader or Head of School. For other types of concern, the school receptionists are available to direct concerned persons to the correct member of staff. In most cases, concerns can be resolved informally, without the need to initiate formal procedures.
- 2.3 In the case of **complaints**, the procedures outlined throughout this document should be followed. The school defines a complaint as:
'An expression of specific dissatisfaction about particular actions taken, or a lack of action taken, by a member or members of the school staff'. Any person, including members of the public, may make a complaint; these procedures apply to all such potential complainants.



3 STAGE I: INFORMAL COMPLAINT

- 3.1 Stage I aims to resolve the complaint informally, through the intervention of the appropriate senior manager(s). Examples might include dissatisfaction about some aspect of teaching or pastoral care, about a timetable clash, a billing error or some other aspect of the school's systems, equipment or operational procedures.

Procedures

- a) Where a concern (see above) has been made by a complainant who now wishes to raise the issue with senior management, depending on severity, it should be treated as an informal complaint. In the event of a direct informal complaint, it should be addressed to the relevant senior manager and/or the Head of School.
- b) The senior manager/Head of School will arrange to meet with (or, where a meeting is not immediately possible, place a call to) the complainant.
- c) In the event of a technical complaint better dealt with directly by a senior manager (i.e. a specific timetabling complaint) the Head of School should be informed (and may, if appropriate, also attend the meeting).
- d) If the complaint relates to the Head of School it will be referred to the Head who will initially deal with it as an informal complaint.
- e) The senior manager(s)/Head of School will normally meet with the complainant within five working days of notification.
- f) The senior manager/Head of School will listen to and record in writing the complaint. These notes will be kept on file for at least one year. Copies of any written response to the complaint and related documentation, including copies of all communication between the senior manager/Head of School and the complainant will also be kept on file.
- g) If possible, the senior manager/Head of School will offer resolution and/or reassurance at this meeting. If further information is required, the senior manager/Head of School will investigate, reconvening with the complainant no more than five working days after the initial meeting. In most cases this second meeting should be face-to-face, though a call may be appropriate for smaller issues with positive resolutions or due to the physical location of the complainant.
- h) If the complainant remains dissatisfied following this informal approach, the complaint should be forwarded to the Head (and becomes a Formal Complaint – Stage II).

4 STAGE II: FORMAL COMPLAINT

- 4.1 In Stage II formal written complaints are considered by the Head of School.
- a) Whether a complainant has previously raised the complaint with a senior manager or not, progression to Stage II requires a formal written letter of complaint, addressed to the Head.
 - b) The Head will acknowledge the complaint in writing as soon as possible after receiving it. This will normally be within five working days. A copy of the relevant sections of this document will be enclosed with this acknowledgement.
 - c) The complainant will be asked to supply as much detail regarding the complaint as possible, completing the 'Formal Complaints Form' (see APPENDIX 1), which will also accompany the acknowledgement.



- d) The complainant will be invited to meet with the Head within ten working (school) days of receipt of the written complaint. If this is not possible the school will write to explain the reason for the delay, giving a date by which the Head is available. Where appropriate, and with due regard to privacy and balance in participant numbers, the Head will invite relevant members of staff to this meeting (for example, if technical or phase- specific expertise is required).
- e) Where necessary the Head will investigate the complaint, reconvening with the complainant within ten working days of the original meeting.
- f) With the relevant details established, the Head will provide a written response to the complainant. This response, presented within 10 working days of the last meeting with the complainant, will give a full explanation of the Head's conclusion and the reasons for it. If follow-up action is needed, this will also be indicated in the response. If not presented in person at the outset, the written response will also be accompanied by an invitation to meet the Head to discuss the response.
- g) The Head will keep written, signed and dated records of all meetings and telephone conversations, and other related documentation, including the formal response.
- h) If the complainant remains unsatisfied with the outcome of the Stage II investigation and the Head's conclusions, the complaint may be progressed to Stage III – Governor Review.

5 STAGE III: GOVERNOR REVIEW

- 5.1 In Stage III unresolved complaints (or complaints against the Head of School) are presented to a Complaints Panel, constituted of three members of the Governing Body. **Used as a last resort**, the purpose of this stage is to give the complaint a fair hearing in front of a panel of governors who have no prior knowledge of the details of the complaint and who can, therefore, consider it without prejudice.

Procedures

- a) Unless the complaint is made against the Head of School personally, it will have been through Stage II and received a written response (if this isn't the case, complaints addressed directly to the Governing Body that have not been Stage II will be reverted to the Head). In the event of the former, or if the complainant is unhappy with the outcome of Stage II, a written request for review, clearly stating the reasons that it is being made, should be sent to the Chair of Harrow Appi's Board of Governors.
- b) The Chair will acknowledge receipt of the request for review within five working days. A copy of this document will be enclosed with the acknowledgement.
- c) The Chair will convene a Complaints Review Panel, constituted of three members of the Governing Body (including the Chair). The Head will not be a member of this Panel, though may be invited to sit as a non-voting member, if appropriate. In addition to the panel of governors, a member of the school's administrative staff will act as secretary to the panel in order to record a full record of the process.
- d) The complainant will be asked to supply as much detail regarding the complaint as possible, including the original 'Formal Complaints Form' (see APPENDIX 1) submitted during Stage II. The Panel will also ask the School to supply all relevant documentation, including a written report detailing procedures followed and actions taken to date.



- e) The complainant will be invited to meet with the Complaints Review Panel within fifteen working (school) days of receipt of the written complaint. If this is not possible the school will write to explain the reason for the delay, giving a date by which the Panel will be available. In the event that a complainant arrives to the meeting with previously undisclosed participants, the Complaints Review Panel reserves the right to deny those parties access to the meeting, or to adjourn the meeting.
- f) With the agreement of the Chair of the Panel, and having informed the complainant previously, the Head may invite members of staff directly involved in matters raised by the complainant to attend relevant portions of the meeting.
- g) As a general rule, no evidence or witnesses previously undisclosed will be introduced into the meeting by any of the participants. If either party wishes to do so, the meeting will be adjourned so that the other party has a fair opportunity to consider and respond to the new evidence.
- h) If necessary, the Complaints Review Panel will carry out further investigations prior to reaching a conclusion.
- i) In closing the meeting, the Chair will explain that the Panel will now consider its decision (or requires further information – see 8) and that written notice of the decision will be sent to the Head and the complainant within 10 working days.
- j) The Panel will then:
 - reach a majority decision regarding the complaint
 - decide on the appropriate action to be taken to resolve the complaint
 - recommend, where appropriate, to the governing body changes to the school's systems or procedures to ensure that similar issues do not recur
- k) With a final decision made, the Complaints Review Panel will provide a written response to the complainant. This response, presented within 10 working days of the last meeting with the complainant, will give a full explanation of the Panel's decision and the reasons for it. If follow-up action is needed, this will also be indicated in the response.
- l) The Head will keep a copy of the final decision, and all relevant notes and correspondence, on file in the school for a period of one year from the date of the Panel's conclusion.

5.2 The Complaints Review Panel's decision is to be considered final and binding.

6 SERIAL AND PERSISTENT COMPLAINANTS

- 6.1 There may be occasions when, despite all stages of the above procedure having been followed, the complainant remains dissatisfied. If a complainant tries to re-open the same issue, the Chair of Governors can inform them that the procedure has been completed and that the matter is closed.
- 6.2 If the complainant contacts the school again on the same issue, the correspondence may be viewed as 'serial' or 'persistent' and the school may choose not to respond. However, the decision not to respond must be taken with due consideration of whether:



- the school has taken every reasonable step to address the complainant's concerns
- the complainant has been given a clear statement of the school's position and the complainant's options (if any)
- they are contacting the school repeatedly but making substantially the same points each time
- the school has reason to believe the individual is contacting them with the intention of causing disruption or inconvenience
- their letters/emails/ calls are often or increasingly abusive or aggressive
- they make insulting personal comments about, or threats towards, staff

Moreover, the school will not stop responding just because an individual is difficult to deal with or asks complex questions. However, where the complainant has been through all three-complaint stages the school will consider the matter to be closed.

- 6.3 A complaint may be regarded as 'unreasonable' when the person making the complaint:
- refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance
 - refuses to co-operate with the complaints investigation process while still wishing their complaint to be resolved
 - refuses to accept that certain issues are not within the scope of a complaints procedure
 - insists on the complaint being dealt with in ways which are incompatible with the school's complaints procedure (as above) or with good practice
 - introduces trivial or irrelevant information which the complainant expects to be taken into account and commented on, or raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales
 - makes unjustified complaints about staff who are trying to deal with the issue, and seeks to have them replaced
 - changes the basis of the complaint as the investigation proceeds
 - repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been addressed)
 - refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed including referral to a Complaints Review Panel seeks an unrealistic outcome
 - makes excessive demands on the time of staff members by frequent, lengthy, complicated and stressful contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.
- 6.4 Before concluding that a complaint is 'unreasonable', the Head of School or Chair of Governors will discuss any concerns with the complainant informally.



APPENDIX 1

FORMAL COMPLAINTS FORM

I wish to make a complaint about the school; I have already discussed the matter informally, but now wish to invoke the formal complaints procedure.

NAME OF COMPLAINANT	
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NAME OF CHILD (if appropriate)		HOUSE/YEAR	
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MEMBER(S) OF STAFF PREVIOUSLY SPOKEN TO IN REGARD THE COMPLAINT		DATE OF THAT INTERACTION	
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CONTACT DETAILS	E-MAIL	
	TELEPHONE	

Please give as much detail about the complaint as possible, using additional sheets as necessary. Please include as many dates, names and specific details as possible. You may also attach to this document any further materials relating to the complaint.

SIGNED		DATE	

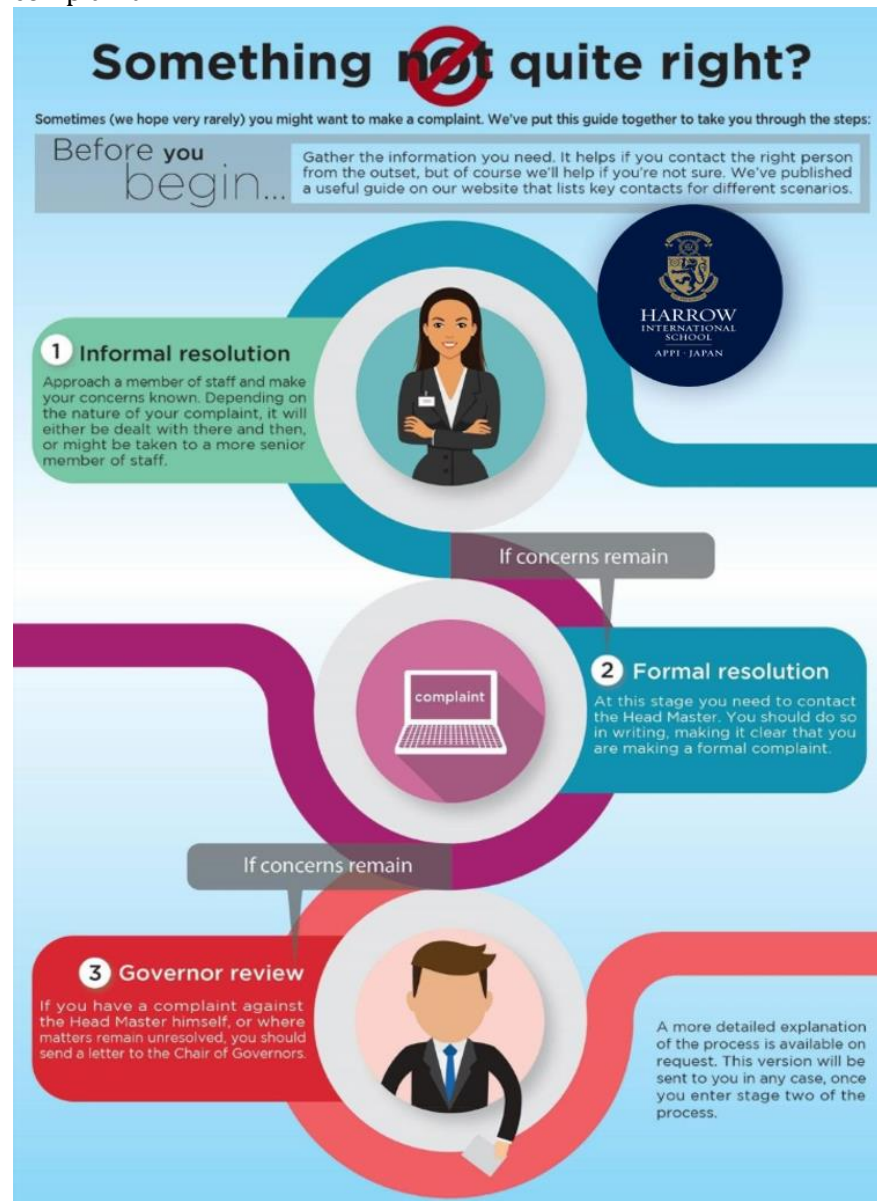
A copy of this document should be forwarded to the Head's office.
We suggest you keep a copy for your own reference.



APPENDIX 2: Exemplar Complaints Guidance Sheet

(This example - Harrow International School, Bangkok)

Graphic to be issued by senior managers, where it is thought it will help, on first receiving a complaint:





APPENDIX 3: Exemplar Complaints Poster



It's good to talk

At Harrow ApPI Japan we want everyone to feel that their voice is heard. We understand that sometimes it's difficult to know who to speak to. This guide will help you decide who to go to.



Day-to-day matters

Pastoral (well-being)
Things like...
● Homework, classwork, tests ● Friendship issues, loneliness, unhappiness ● Social and emotional issues ● Coping skills, conflict resolution, crisis intervention ● Boarding etc.
You can talk to...
Tutors or class teachers, School Counsellors, Prep House Leader, Heads of House, Heads of Phase, Boarding House Parent or **the Director of Houses**



Academic
Things like...
● Homework, classwork, tests ● Extra help and support with schoolwork ● Subject choice matters ● Careers and university advice ● Setting and teacher allocation etc.
You can talk to...
Tutors or class teachers, Heads of Faculty or Departments, Prep House Leader, Heads of House, Heads of Phase, Boarding House Parent or **the Director of Studies**



Co-curricular (LiA, sport, arts)
Things like...
● Sports teams ● Coaches and team selection ● Transport and off-site travel ● Expeditions and trips ● Orchestras, bands, exhibitions ● Specialist equipment for sports and activities etc.
You can talk to...
Tutors or class teachers, Sports Coaches, Activity Leaders, **Directors of Sport or Music or the Head of LiA**



School-wide matters and those not yet resolved

Things like...
● Policy and procedure ● Management and leadership ● Finance and facilities ● Matters not resolved after discussion with those above etc.
You can talk to...
The Second Master, the Head of Lower School or the Head of Upper School



Any matters still not yet resolved

You can talk to...
The Head Master
or
the Chair of Governors



You can get the contact details for any of these people easily via info@harrowappi.jp