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 from external stakeholders to the school. This policy applies to:

- Parents making a complaint
- External stakeholders making a complaint
- Staff managing external complaints

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

It is imperative that there is a systemic means of recording, tracking and analysis of all concerns and complaints in line with Harrow Standard 1.9 and the associated Success Descriptors. Trends from the complaints log should inform the development and actions of the SDP.

1.2 It is anticipated that this policy, and then only in sections as relevant, will be shared with stakeholders via the school website and with complainants at the point of formal proceedings. Senior leaders may wish to share the graphic in APPENDIX 2 after the first contact is made with the complainant if they feel this is necessary.

1.3 The complaints process is divided into three stages:

STAGE	DESCRIPTION
I. Informal / Concern	Informal raising of a concern notified orally or in writing to a senior manager.
II. Formal Complaint	A formal complaint made in writing to the Head.
III. Governors' Review	An unresolved formal complaint, progressed **as a last resort** to the AISL Chief Education Officer, the CEO, or the Chief Financial Officer, depending on the context, for the attention of the Governing Body.

1.4 The Head Master/Mistress and SLT are responsible for ensuring that there is an effective means of recording concerns and complaints, tracking progress in resolving complaints and analysing trends so that they can be reflected in the risk register, School Self-Evaluation and Strategic Development Plan. A securely kept confidential Complaints Log must contain all communications, evidence, meeting notes, decisions taken, and subsequent actions undertaken in relation to all complaints at Stages II and III (whether they were upheld or not). The Log must indicate at which Stage the complaint was resolved and whether the complaint was directly in relation to the provision of boarding.

1.5 Complaints against the Head personally are accelerated directly to Stage III. Safeguarding concerns should be notified immediately to the Designated Safeguarding Lead, or if they are regarding the Designated Safeguarding Lead, to the Head. If a safeguarding complaint is regarding the Head, then it should be made directly to the AISL Chief Education Officer (see *Safeguarding Policy (HS19)*).

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 class teacher/form tutor, the appropriate Phase Leader or Head of School. For other types of concern,

the school receptionists are on hand to direct concerned persons to the correct member of staff. In most cases, concerns can be resolved informally, without the need to invoke formal procedures.

2.3 In the case of **complaints**, 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'.
Any person, including members of the public, may make a complaint; these procedures apply to all such potential complainants.

3 STAGE I: INFORMAL CONCERNS

3.1 Stage I aims to resolve the concerns and complaints informally, through 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 leader and/or the relevant Head of School.

b) The senior leader/Head of School will arrange to meet with (or, where a meeting is not immediately possible, place a telephone call to) the complainant. It is important to respond to a complaint (informal in this case) within 24 hours to acknowledge the receipt of the complaint and the intention of arranging a meeting with the complainant.

c) In the event of a technical complaint better dealt with directly by a senior leader (i.e. a specific timetabling complaint) the relevant Head of School should be informed (and may, if appropriate, also attend the meeting).

d) The senior leader(s)/Head of School will normally meet with the complainant within five working days of notification.

e) The senior leader/Head of School will listen to and record in writing the complaint. These notes will be kept on file. Copies of any written response to the complaint and related documentation, including copies of all communication between the senior leader/Head of School and the complainant will also be kept on file.

f) If possible, the senior leader/Head of School will offer resolution and/or reassurance at this meeting. If further information is required, the senior leader/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 telephone call may be appropriate for more minor issues.

g) If the complainant remains dissatisfied following this informal approach, the complaint should be forwarded to the Head in writing (and becomes a Formal Complaint – Stage II).

h) All informal complaints and concerns must be recorded and trends tracked by senior leaders so that strategies for improvements and mitigations can be made.

4 STAGE II: FORMAL COMPLAINTS

4.1 In Stage II formal written complaints are considered by the Head.

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 (within 24 working school day hours) after receiving it.

c) The complainant then 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 findings and decisions. 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/typed, signed and dated records of all meetings and communications, and other related documentation, including the formal response.

h) If the complainant remains unsatisfied with the outcome of the Stage II investigation and the school's findings, the complaint may be progressed to Stage III – Governor Review.

i) All Stage II complaints and concerns must be recorded within the Complaints Log and trends tracked by senior leaders so that strategies for improvements and mitigations can be made.

When a formal complaint is raised the complainant has a right to request all forms of communications including, but not limited to, meeting minutes, email exchanges, files, and records related to the 'individual', 'the incident', and 'the complaint' be made available to them.

5 STAGE III: GOVERNOR REVIEWS

5.1 In Stage III unresolved complaints (or complaints against the Head) are presented to a Complaints Panel, constituted of at least two members of the Governing Body and one individual who is independent of the management of the school. **Used as a last resort**, the purpose of this stage is to give the complaint a fair hearing in front of a panel 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 personally, it will have been through Stage II and received a written response (if this isn't the case a complaint addressed directly to a Chief Officer that has not been through Stage 2 will be reverted to the Head). In the event of the former, or if the complainant is unhappy with the outcome of Stage 2, a written request for review, clearly stating the reasons that it is being made, should be sent to the AISL Chief Education Officer. The CEdO, or other AISL Chief Officer, will take on the role of Chair of the Complaints Panel.

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 a minimum of two members of the Governing Body and one individual who is independent of the management of the school. 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 with a full record of the process being recorded.

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 corresponding 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 is available. The complainant has the right to be accompanied at the meeting. Should a complainant arrive to the meeting with previously undisclosed supporting 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 prior, 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 may need to 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 findings and recommendations of the Panel will be sent to the Head and the complainant within 10 working days.

j) The Panel will then:

- reach a unanimous or majority decision on 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 happen again.

k) With a final decision made, the Complaints Review Panel will provide a written response including findings and recommendations to the complainant and, where appropriate, the person at the centre of the complaint. 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 notes and correspondence in a secure manner on file in the school's records, making them available for inspection by the Chief Education Officer, a governor, or other relevant party, if requested.

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

5.3 Where appropriate, the Senior Leadership Team will lead a review of the management of the complaint to improve systems and processes in managing complaints and addressing the issue raised as part of school improvement procedures moving forward.

5.4 Complaints that are raised to Stage III must be reported within the next scheduled BOG meeting via the Head's Report.

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 the original Complaints Panel can inform them that the procedure is completed and that the matter is closed.

6.2 If the complainant contacts the school again on the same issue, then 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 needs;
- the complainant has been given a clear statement of the school's position and their 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/telephone calls are often, always 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 adopted complaints procedure 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 issues, 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 school time 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 or CEdO 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	

NAME OF CHILD (if appropriate)		**HOUSE/ YEAR/ CLASS**	

MEMBER(S) OF STAFF PREVIOUSLY SPOKEN TO IN REGARD THE COMPLAINT		**DATE OF MEETING**

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.

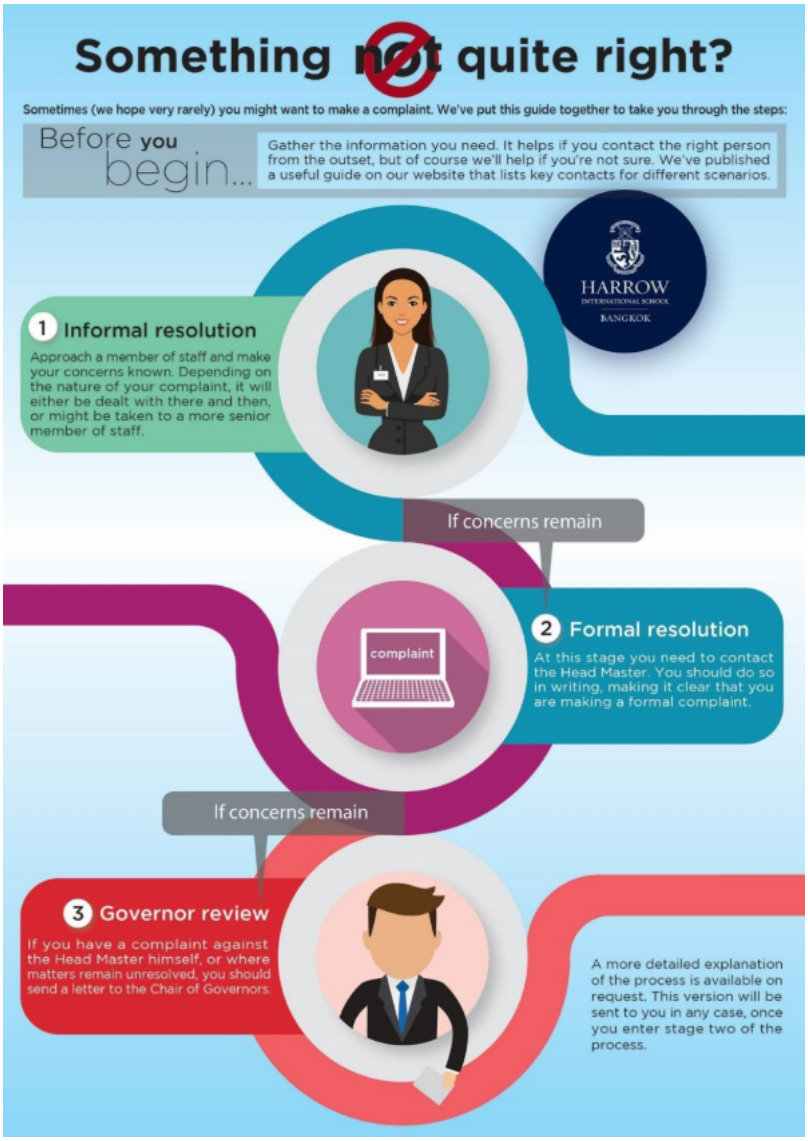
SIGNED:		**DATE:**	

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 leaders, where it is thought it will help, on first receiving a complaint:



APPENDIX 3: Exemplar Complaints Poster

(This example - Harrow International School, Bangkok)

