



FELIXSTOWE
INTERNATIONAL COLLEGE
FRIENDSHIP THROUGH EDUCATION

Complaints Policy and Procedure

Version Date:	September 2025
Signed:	Principal
Signed:	Chair of Governors
Review cycle:	1 year
Date of next review:	September 2026

1. Definitions and aims

1.1 Definitions

DfE guidance explains the difference between a concern and a complaint:

- A concern is defined as “an expression of worry or doubt over an issue considered to be important for which reassurances are sought”
- A complaint is defined as “an expression of dissatisfaction however made, about actions taken or a lack of action”

In most cases, a concern can be resolved through informal means. A complaint will follow the formal procedure.

1.2 Aims

Our school aims to meet its statutory obligations when responding to complaints from parents and carers of pupils at the school, and others. When responding to complaints, we aim to:

- Be impartial and non-adversarial
- Facilitate a full and fair investigation by an independent person or panel, where necessary
- Address all the points at issue and provide an effective and prompt response
- Respect complainants’ desire for confidentiality
- Treat complainants with respect and courtesy
- Ensure that any decisions we make are lawful, rational, reasonable, fair and proportionate, in line with the principles of administrative law
- Keep complainants informed of the progress of the complaints process
- Consider how the complaint can feed into school improvement evaluation processes

We try to resolve concerns or complaints by informal means wherever possible. Where this is not possible, formal procedures will be followed, and the school will aim to give the complainant the opportunity to complete the complaints procedure in full.

To support this, we publicise the existence of this policy and make it available on the school website, and free of charge on request to parents of pupils and of prospective pupils. As many of our parents live overseas, complaints and correspondence may be handled by email and meetings held by video call, and the school can arrange interpretation support where needed. Throughout the process, we will be sensitive to the needs of all parties involved and make any reasonable adjustments needed to accommodate individuals.

2. Legislation and guidance

This document meets the requirements set out in Part 7 of the Schedule to the Education (Independent School Standards) Regulations 2014 (paragraph 33), which requires the school to have and make available a written procedure to deal with complaints from parents of pupils at the school, with the prescribed stages, timescales, panel arrangements, record-keeping and confidentiality provisions. It is based on the DfE’s best practice guidance on school complaints procedures.

(References in earlier versions to the Education and Skills Funding Agency (ESFA) have been removed: the ESFA closed in March 2025 and its functions transferred to the DfE.)

As a boarding school, the College also meets Standard 14 of the National Minimum Standards for Boarding Schools (May 2026): it has and follows an effective policy on recording and responding to parental complaints (14.1); it provides a clear and easily accessible process for boarders to raise their own complaints about boarding provision, without penalty for complaints raised in good faith (14.2); and its written record identifies complaints relating to boarding provision and the action taken, keeps complaints that are withdrawn, and is reviewed for emerging patterns (14.3).

In accordance with paragraph 32(1)(h) of the Independent School Standards, the number of complaints registered under the formal procedure during the preceding school year is made available to parents of pupils and of prospective pupils on request.

3. Scope

The school intends to resolve complaints informally where possible, at the earliest possible stage. There may be occasions when complainants would like to raise their concerns formally; this policy outlines the procedure for handling such complaints. This policy does not cover complaints procedures relating to:

- Admissions
- Statutory assessments of special educational needs (SEN)
- Safeguarding matters
- Suspension and permanent exclusion
- Whistleblowing
- Staff grievances
- Staff discipline

Please see our separate policies for procedures relating to these types of complaint. Complaints about services provided by other providers who use school premises or facilities should be directed to the provider concerned.

4. Roles and responsibilities

4.1 The complainant

The complainant will get a more effective and timely response to their complaint if they explain the complaint in full as early as possible and if they:

- Follow these procedures
- Co-operate with the school throughout the process, and respond to deadlines and communication promptly
- Ask for assistance as needed
- Treat all those involved with respect, and respect confidentiality
- Do not approach individual governors about the complaint
- Do not publish details about the complaint on social media

4.2 The investigator

An individual will be appointed to look into the complaint and establish the facts. They will:

- Interview all relevant parties, making clear notes and keeping these securely
- Carefully consider records and any written evidence, and keep these securely
- Be mindful of the timescales for responding
- Provide a comprehensive, open, transparent and fair consideration of the complaint
- Prepare a comprehensive report to the Principal or complaints panel which includes the facts, potential solutions and recommended courses of action

4.3 The complaints co-ordinator

The complaints co-ordinator can be the Principal, the designated complaints governor, or any other staff member providing administrative support. The complaints co-ordinator will:

- Keep the complainant up to date at each stage in the procedure
- Make sure the process runs smoothly by liaising with staff members, the Principal, the Chair of Governors and the clerk
- Be aware of issues relating to sharing third-party information, and additional support needed by complainants – for example interpretation support (particularly for overseas parents), or where the complainant is a child or young person, including a boarder complaining on their own behalf
- Keep records

4.4 Clerk to the Advisory Board

The clerk will:

- Be the contact point for the complainant and the complaints panel, including circulating the relevant papers and evidence before the panel hearing
- Ensure that those involved are aware of relevant legal rights and duties, including the Equality Act 2010, the Data Protection Act 2018 and UK GDPR
- Set the date, time and venue of the hearing, ensuring the dates are convenient to all parties and the venue and proceedings are accessible, and arrange the hearing
- Record and circulate the minutes and outcome of the hearing

4.5 Panel chair

The panel chair will chair the meeting, ensuring that everyone is treated with respect throughout; make sure all parties see the relevant information, understand the purpose of the panel, and are allowed to present their case; and ensure the panel is open-minded and acts independently, with no member having an external interest in the outcome or any involvement in an earlier stage of the procedure.

5. Principles for investigation

When investigating a complaint, we will try to clarify: what has happened; who was involved; and what the complainant feels would put things right.

5.1 Timescales

The complainant must raise the complaint within 3 months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within 3 months of the last incident. We will consider exceptions to this timeframe where there were valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved;

this is decided case by case, and the school is mindful that some of our parents are overseas and that boarders may take time to feel able to raise a concern.

When complaints are made out of term time, we will consider them to have been received on the first school day after the holiday period. If at any point we cannot meet the timescales set out in this policy, we will set new time limits with the complainant, send them details of the new deadline and explain the delay.

If other bodies are investigating aspects of the complaint – for example the police, the local authority or safeguarding partners – this may affect our ability to adhere to these timescales or result in the procedure being suspended until those investigations conclude. If a complainant commences legal action against the school in relation to their complaint, we will consider whether to suspend the complaints procedure until those proceedings have concluded.

6. Stages of complaint (not complaints against the Principal or governors)

In line with the Independent School Standards, we have adopted a three-stage process: Stage 1 – informal resolution; Stage 2 – formal investigation; Stage 3 – panel hearing.

6.1 Stage 1: informal

The school will take informal concerns seriously and make every effort to resolve the matter quickly. It may be the case that the provision or clarification of information will resolve the issue.

The complainant should raise the complaint as soon as possible with the relevant member of staff or the Principal as appropriate, either in person or by letter, telephone or email. If the complainant is unclear who to contact or how to contact them, they should contact the school office by phone (+44 1394 282388) or email (registrar@ficedu.org). The complainant should also state what they feel might resolve the concern.

The school will acknowledge informal complaints within 5 school days, and investigate and provide a response within 10 school days. The informal stage will involve a meeting between the complainant and the subject of the complaint and/or the Principal, as appropriate (by video call where the complainant is overseas). If the complaint is not resolved informally, it will be escalated to a formal complaint.

6.2 Stage 2: formal

Submitting a formal complaint

Formal complaints can be raised: by letter or email (preferred); over the phone; in person; or by a third party acting on behalf of the complainant with their consent (for international boarders this may be the educational guardian). Complaints should be submitted via the school office, marked private and confidential if made in writing.

The complainant should provide details such as relevant dates, times and the names of witnesses of events, alongside copies of any relevant documents, and what they feel would resolve the complaint. If complainants need assistance raising a formal complaint, they can contact the school office by email: registrar@ficedu.org.

Investigation

The Principal will record the date the complaint is received and will acknowledge receipt in writing (by letter or email) within 5 school days. Within this acknowledgement, the Principal will seek to clarify the nature of the complaint, what remains unresolved and what outcome the complainant would like to see.

The Principal (or a designated member of the senior leadership team appointed by the Principal for this purpose – although the decision will not be delegated) will then conduct an investigation, and may call a meeting to clarify concerns and seek a resolution. The complainant may be accompanied to any such meeting, and should inform the school of the identity of their companion in advance. In certain circumstances, the school may need to refuse a request for a particular individual to attend – for example, if there is a conflict of interest – in which case the school will notify the complainant as soon as possible so that they can arrange alternative accompaniment.

Conclusion and escalation

The written conclusion of the investigation will be sent to the complainant within 10 school days of the acknowledgement, detailing the actions taken to investigate the complaint, a full explanation of the decision and the reasons for it, and, where appropriate, the actions to be taken to resolve the complaint. If the investigator cannot meet this deadline, they will provide the complainant with an update and a revised response date.

If the complainant wishes to proceed to the next stage of the procedure, they should inform the clerk to the Advisory Board in writing within 5 school days of receiving the Stage 2 conclusion, giving details of how they feel the previous stage has not addressed their complaint sufficiently and what they feel would resolve it. Requests received outside this timeframe will be considered in exceptional circumstances. Escalations can be made by letter or email, over the phone, in person, or through a third party acting on the complainant's behalf. The clerk will acknowledge receipt of the request within 5 school days.

6.3 Stage 3: panel hearing

Convening the panel

The panel will be appointed by, or on behalf of, the proprietor and will consist of at least 3 people who were not directly involved in the matters detailed in the complaint. At least one panel member will be independent of the management and running of the school, as required by paragraph 33 of the Independent School Standards; the remaining members will normally be drawn from members of the Advisory Board without direct knowledge of the complaint, who will select a panel chair from among themselves. If not enough impartial members are available, we will seek suitably skilled panel members elsewhere who can demonstrate their independence and impartiality. The panel will have access to the existing record of the complaint's progress (see section 10).

The complainant will be given reasonable notice of the date of the panel hearing; however, the panel reserves the right to convene at its convenience rather than that of the complainant. The clerk will aim to find a date within 10 school days of the request, where possible. If the complainant rejects the offer of 3 proposed dates without good reason, the clerk will set a date and the hearing will go ahead using written submissions from both parties. Any written material will be circulated to all parties at least 5 school days before the date of the hearing. The Advisory Board will ensure the hearing is properly minuted.

At the hearing

The hearing will be held in private. Electronic recordings of meetings or conversations are not normally permitted unless required as part of reasonable adjustments; prior knowledge and consent of all parties attending will be sought, and consent recorded in any minutes. The panel will not normally accept as evidence recordings of conversations obtained covertly and without the informed consent of all parties recorded.

At the hearing, the complainant and representatives from the school, as appropriate, will be present; each will have had the opportunity to make written submissions prior to the meeting. The complainant must be allowed to attend the panel hearing and be accompanied by a suitable

companion if they wish (a complainant overseas may attend by video call). We don't encourage either party to bring legal representation, but will consider it on a case-by-case basis; for instance, a school employee called as a witness may wish to be supported by their union. Representatives from the media are not permitted to attend.

Each individual will have the opportunity to give statements and present their evidence, and witnesses will be called as appropriate. The panel, the complainant and the school representative(s) will be given the chance to ask and reply to questions. Once the complainant and school representatives have completed presenting their cases, they will be asked to leave, and the evidence will then be considered.

The outcome

The panel can uphold the complaint, in whole or in part, or dismiss it, in whole or in part. If the complaint is upheld, the panel will decide the appropriate action to resolve the complaint and, where appropriate, recommend changes to the school's systems or procedures to prevent similar issues in the future.

The panel will put together its findings and recommendations, and will ensure that copies of the findings and recommendations (together with the minutes of the hearing) are sent by email or otherwise given to the complainant and, where relevant, the person complained about, and are available for inspection on the school premises by the proprietor and the Principal, as required by the Independent School Standards. The school will inform those involved of the decision in writing within 5 school days.

7. Complaints from boarders

In line with NMS Standard 14.2, boarders have their own clear and easily accessible route to raise complaints about boarding provision, separate from (but able to feed into) the parental procedure above. A boarder can raise a concern or complaint:

- With any member of staff, including the house mother/houseparents on duty, their tutor or the Head of Boarding – all staff know what to do when a boarder approaches them with a concern (NMS 11.3)
- With the Principal or Deputy Principal directly
- With the 'independent person' – the identified person independent of the staff and of leadership and governance whom boarders may contact about personal problems or concerns (NMS 11.4), whose details are displayed in each boarding house
- Anonymously or in writing through the worry boxes in the boarding houses, or through the boarders' meetings and surveys used to seek boarders' views (NMS Standard 13)
- Through their parents/carers or educational guardian, who may raise the matter under the main procedure in section 6

Boarders' complaints are taken seriously, responded to promptly, and recorded. A boarder will never be penalised for raising a concern or complaint in good faith. Where a boarder's complaint is serious, unresolved, or the boarder wishes it to be treated formally, the school will inform the boarder's parents/carers (and guardian, where appropriate) and the complaint may proceed through the formal stages in section 6, with the boarder supported throughout. Boarders are also provided with the details of external support services, such as Childline and the Children's Commissioner's Help at Hand service (NMS 11.5), and details of how to contact the Independent Schools Inspectorate or Ofsted are available from the school office.

8. Complaints against the Principal, a governor or the Advisory Board

Complaints made against the Principal or any member of the Advisory Board should be directed to the clerk to the Advisory Board in the first instance, via the school office, marked private and confidential if made in writing (or to registrar@ficedu.org for the attention of the Chair of Governors).

8.1 Stage 1: informal

If the complaint is about the Principal or one member of the Advisory Board (including the Chair or Vice-Chair), a suitably skilled and impartial governor will carry out the steps at Stage 1 (set out in section 6 above). Complaints about an individual governor will normally be heard by the Chair of Governors.

8.2 Stage 2: formal

If the complaint is about the Principal, a suitably skilled member of the Advisory Board (usually the Chair of Governors) will carry out the steps at Stage 2. If the complaint is about the Chair, jointly about the Chair and Vice-Chair, the entire Advisory Board or a majority of it, an independent investigator will carry out the steps in Stage 2; they will be appointed by the Advisory Board and will write a formal response at the end of their investigation.

8.3 Stage 3: panel hearing

If the complainant remains dissatisfied, the complaint will be considered by a complaints panel as set out in section 6.3. Where the complaint concerns the Chair, the whole Advisory Board or a majority of it, the panel will be constituted so as to be completely independent of those complained about, and will always include at least one member independent of the management and running of the school.

9. Referring complaints on completion of the school's procedure

If the complainant is unsatisfied with the outcome of the school's complaints procedure and the complaint is regarding the school not meeting standards set by the DfE in any of the following areas, the complainant can refer their complaint to the DfE: education; pupil welfare and health and safety; school premises; staff suitability; making information available to parents; or the spiritual, moral, social or cultural development of pupils. The DfE will consider reports of a major failure to meet the standards and, where appropriate, can arrange an emergency inspection to look at pupil welfare and health and safety and make sure that the school deals with serious failings. For more information or to refer a complaint, see www.gov.uk/complain-about-school. This information is included in the outcome letter to complainants.

Concerns about the welfare of boarders may also be raised with the school's boarding inspectorate at any time, and safeguarding concerns with the local authority; contact details are available from the school office.

10. Unreasonable, vexatious and persistent complaints

10.1 Unreasonable and vexatious complaints

Most complaints raised will be valid, and we will treat them seriously. However, a complaint may become unreasonable or vexatious if the person:

- Has made the same complaint before, and it has already been resolved by following the school's complaints procedure
- Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive

- Knowingly provides false information
- Insists on pursuing a complaint that is unfounded, or out of scope of the complaints procedure, or refuses to accept that certain issues are not within its scope
- Pursues a valid complaint in an unreasonable manner – e.g. refuses to articulate the complaint or the outcomes sought despite offers of assistance, refuses to co-operate with the process, or insists the complaint is dealt with in ways incompatible with this procedure and its timeframes
- Introduces trivial or irrelevant information, or raises large numbers of detailed but unimportant questions and insists they are fully answered immediately
- 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 goes on
- Makes a complaint designed to cause disruption, annoyance or excessive demands on school time
- Seeks unrealistic outcomes, or a solution that lacks any serious purpose or value
- Uses threats to intimidate, uses abusive, offensive or discriminatory language or violence, or publishes unacceptable information on social media or other public forums

This list is not exhaustive and is for guidance; it is at the school's discretion what is deemed unreasonable. Complainants should try to limit their communication with the school while the complaint is being progressed, as repeated correspondence can delay the outcome.

Steps we will take

We will take every reasonable step to address the complainant's concerns and give them a clear statement of our position and their options, maintaining our role as an objective arbiter throughout and following our complaints procedure as normal wherever possible. Whenever possible, the Principal or Chair of Governors will discuss any concerns with the complainant informally before applying an 'unreasonable' marking; if the behaviour continues, the Principal will write to the complainant explaining that their behaviour is unreasonable and referring them to this policy. For complainants who excessively contact the school causing significant disruption, we may: give the complainant a single point of contact via an email address; limit the number of times they can make contact, such as a fixed number per term; ask them to engage a third party to act on their behalf, such as Citizens Advice; or put any other strategy in place as necessary.

Stopping responding

We may stop responding to the complainant when all of these factors are met: we believe we have taken all reasonable steps to help address their concerns; we have provided a clear statement of our position and their options; and the complainant contacts us repeatedly, making substantially the same points each time. The case is stronger where communications are abusive or aggressive, include insulting personal comments or threats towards staff, or where we have reason to believe the individual intends to cause disruption or inconvenience. Any 'serial or persistent' marking is applied to the subject or complaint itself rather than to the complainant, and we will not refuse to accept further correspondence outright. Where we stop responding, we will inform the individual that we intend to do so, and explain that we will still consider any new complaints they make that are materially different from, or unconnected to, the previous concern.

In response to any serious incident of aggression or violence, we will immediately inform the police and communicate our actions in writing. This may include barring an individual from our school site and providing appropriate support to staff subjected to aggression or violence.

10.2 Duplicate complaints

If we have resolved a complaint under this procedure and receive a duplicate complaint on the same subject from a partner, family member or other individual, we will assess whether there are aspects that we hadn't previously considered, or any new information to take into account. If we are satisfied that there are no new aspects, we will tell the new complainant that we have already investigated and responded to this issue and that the local process is complete, and direct them to the DfE if they are dissatisfied with our original handling of the complaint. If there are new aspects, we will follow this procedure again.

10.3 Complaint campaigns

Where the school receives a large volume of complaints about the same topic or subject, especially from complainants unconnected with the school, the school may respond by publishing a single response on the school website or sending a template response to all of the complainants. If complainants are not satisfied with the school's response, or wish to pursue the complaint further, the normal procedures will apply.

11. Record keeping and confidentiality

In accordance with the Independent School Standards, a written record is kept of all complaints, recording: whether the complaint was resolved following the formal stage or proceeded to a panel hearing; the action taken by the school as a result of the complaint, regardless of whether it was upheld; and the progress of the complaint at each stage, including copies of letters and emails and notes relating to meetings and phone calls. In line with NMS 14.3, the record identifies those complaints relating to boarding provision, includes complaints that were made but later withdrawn, and is kept under review by the Principal and the Advisory Board to identify any emerging patterns.

Correspondence, statements and records relating to individual complaints are treated as confidential and held securely, viewed only by those involved in investigating the complaint or on the panel, except where the Secretary of State (or someone acting on their behalf) requests access to them, or where they must be made available to the school's inspectorate in the course of an inspection under the Education and Skills Act 2008, or where the complainant requests access through a subject access request under data protection law or where disclosure is otherwise required by law. Records of complaints will be kept securely, only for as long as necessary, in line with data protection law, our privacy notices and our records retention schedule.

The details of the complaint, including the names of individuals involved, will not be shared with the whole Advisory Board, in case a panel needs to be organised at a later point – except where a complaint is made against the whole Board, which needs to be aware of the allegations in order to respond. Where the Advisory Board is aware of the substance of the complaint before the panel stage, the school will (where reasonably practicable) arrange for an independent panel to hear the complaint. Complainants also have the right to request an independent panel if they believe there is likely to be bias in the proceedings; the decision to approve this request is made by the Advisory Board, which will not unreasonably withhold consent.

12. Learning lessons

The Advisory Board will review any underlying issues raised by complaints with the Principal, where appropriate and respecting confidentiality, to determine whether there are any improvements that the school can make to its procedures or practice to help prevent similar events in the future. Themes arising from boarders' complaints and views feed into the review of boarding provision under NMS Standard 2.

13. Monitoring arrangements

The Advisory Board will monitor the effectiveness of the complaints procedure in ensuring that complaints are handled properly, tracking the number and nature of complaints (including those relating to boarding) and reviewing underlying issues as stated in section 12. The complaints records are logged and managed by the school secretary. The number of formal complaints registered during the preceding school year is reported to the Advisory Board annually and made available to parents on request.

This policy is reviewed annually by the Principal/Deputy Principal, in line with the review cycle on the cover of this policy. At each review, the policy is approved by the Principal and the Advisory Board.

14. Links with other policies

Policies dealing with other forms of complaints include:

- Child protection and safeguarding policy and procedures
- Admissions policy
- Exclusions policy
- Staff grievance procedures
- Staff disciplinary procedures
- SEN policy
- Anti-Bullying Policy (which sets out how pupils can report bullying concerns)
- Statement of boarding principles and practice

Contact details

Complaints regarding day students should be addressed to: Mrs Rebecca Mainprice – beckymainprice@ficedu.org – Tel: 01394 282388

Complaints regarding boarding students should be addressed to: Head of Boarding, Ms Chaerin Lee – chaerinleet@ficedu.org – Tel: 01394 282388

Complaints regarding students with Special Educational Needs should be addressed to: Mrs Katherine Murphy – katherinemurphy@ficedu.org – Tel: 01394 282388

Chair of Governors: in the first instance – registrar@ficedu.org – Tel: 01394 282388

If you are unsure who to contact, the school office (registrar@ficedu.org, +44 1394 282388) will direct your concern to the right person.