

ITALIA CONTI

Complaints Policy and Procedures

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1.1 Overview

Italia Conti is committed to providing a high-quality education and training experience for all its students. It is recognised that from time-to-time problems do arise and students, parents or others may wish to express concern or dissatisfaction with aspects of the quality of services provided. Italia Conti sees the handling and monitoring of complaints as an important aspect of its quality assurance procedures.

Many complaints can be resolved at an informal and/or local level. Italia Conti strongly encourages resolution of this kind and those wishing to make representation under this procedure will be expected to have pursued an informal resolution prior to bringing a formal complaint.

Italia Conti provides education at further and higher educational levels. It is expected that the working practices and processes of the policy will fulfil the specific needs and statutory requirements appropriate to each level.

1.2 Legislation

This document meets the requirements of section 29 of the Education Act 2002, which states that schools must have and make available a procedure to deal with all complaints relating to their school and to any community facilities or services that the school provides, and complies with the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014, which states that Italia Conti must have and make available a written procedure to deal with complaints from parents of students at the school. It is also based on guidance published by the Education and Skills Funding Agency (ESFA) on creating a complaints procedure that complies with the above regulations, and refers to good practice guidance on setting up complaints procedures from the Department for Education (DfE).

1.3 Purpose

The purpose of the complaints procedure is to provide a clear step by step process through which a complainant may, pursue legitimate complaints. Students are reminded that only by following the procedure outlined below can they expect a full and satisfactory outcome to any complaint process.

- Complaints should be made to Italia Conti in the first instance, following the procedures outlined within this policy
- Any complaint about a member of staff should be made to the Chief Executive Officer (CEO), Hayley Newton, c/o HR@italiaconti.co.uk / 020 7608 0044
- Any complaint about the CEO should be made to the Chair of the Board of Governors: Ms Maggie Killingbeck: Maggie.Killingbeck@italiaconti.co.uk
- Complaints about services provided by other providers who use school premises or facilities should be directed to the provider concerned.

1.4 Definitions

The 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”. Italia Conti will resolve concerns through day-to-day communication as far as possible
- A **complaint** is defined as “an expression of dissatisfaction however made, about actions taken or a lack of action”

1.5 Core Principles

In consideration of a reasonable complaint Italia Conti will adhere to the following principles:

- All complaints will be treated fairly, impartially, and effectively
- All complaints will be treated seriously and constructively and can be made without fear of victimisation
- 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
- Ensure that any decisions we make are lawful, rational, reasonable, fair, and proportionate, in line with the principles of administrative law
- Consider how the complaint can feed into Italia Conti improvement evaluation processes.

In consideration of a reasonable complaint Italia Conti will adopt the following practices:

- The Complaints Procedure focuses on resolving complaints rather than apportioning blame.
- Confidentiality owed to staff and students will be protected. Details of a complaint may, however, need to be shared with relevant parties for a full investigation to take place, and individuals named in a complaint will be made aware of the allegations and have the opportunity to give their version of events.
- Wherever possible, complaints will be resolved at an informal and local level and/or without recourse to the formal Complaints Procedure.
- Repeated or vexatious complaints will not be considered.
- All parties involved in a complaint will be kept informed of the progress of the complaint at regular and appropriate intervals during the process.
- Italia Conti aims to respect complainants’ desire for confidentiality and will keep confidential all records relating to individual complaints.
- A written record of formal complaints and their outcomes is kept by the Head of Quality, in conjunction with the Chief Operating Officer. This material will be treated as confidential and held centrally and will be viewed only by those involved in

investigating the complaint or on the review panel. This is except where the secretary of state (or someone acting on their behalf) or the complainant requests access to records of a complaint through a freedom of information (FOI) request or under the terms of the Data Protection Act, or where the material must be made available during a school inspection.

- A written record of all complaints (which may include notes, correspondence, and statements) will be kept at each stage of the procedure, as detailed below, and will include the action taken and at what stage they were resolved. (Note: This information may be provided to relevant external bodies at their request.
- Records of complaints will be kept for at least three years.
- A copy of this policy is available on the Italia Conti website and by request from the administration offices at each site.

Allegations against a member of staff

If the complaint concerns a member of staff, then the complaint should be directed to the CEO via HR@italiaconti.co.uk.

1.6 Timescales:

Italia Conti aims to resolve any complaints informally in a timely manner. Timescales for each stage of the Complaints Procedure are set out in the relevant paragraphs. For the purposes of this policy, a "working day" is defined as a weekday during term time, when Italia Conti is open. The definition of "working day" excludes weekends and Bank Holidays.

The complainant must raise the complaint within three months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within three months of the last incident.

Italia Conti will consider exceptions to this time frame in circumstances 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.

When complaints are made out of term time, we will consider them to have been received on the next working day.

If at any point Italia Conti cannot meet the timescales set out in this policy, they will:

- Set new time limits with the complainant
- Send the complainant details of the new deadline and explain the delay.

1.7 Responsibilities and Management

Italia Conti devolves day to day responsibility for managing the appropriate dissemination of this policy as follows:

Diploma, Degree and HE courses:
Staff

Course Leaders
CEO / HR Manager

The Quality Assurance Team, in conjunction with the Senior Leadership Team, is responsible for monitoring the cyclical review and updating of all policies across Italia Conti according to statutory and regulatory timeframes.

2. Further Education (FE) provision 16+ - Student Complaint

2.1 Policy Statement

It is hoped that most complaints and concerns will be resolved quickly and informally. All concerns and complaints will be treated seriously and confidentially.

Students are encouraged to raise any concerns with an appropriate member of staff at the earliest opportunity, as complaints that are dealt with informally at an early stage have the best chance of being resolved effectively.

Where informal procedures have failed to resolve the problem, students may bring a complaint under this Student Complaints Procedure.

A legitimate complaint is defined as any aspect of the teaching and learning process or general treatment of students by members of staff which appears to fall below the standard which a student can reasonably expect while on the course.

Legitimate complaints fall into a wide range of categories, which cannot be outlined in full for the purposes of this document. However, they may include victimisation or unreasonable differentiation in treatment, sexual harassment, physical assault or unreasonable physical or psychological demands.

A written record is to be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing. Correspondence, statements and records relating to individual complaints are to be kept confidential except where the Secretary or a body conducting an inspection under section 162A of the 2002 Act requests access to them.

Procedure if a student has a legitimate complaint:

2.1 Informal Stage:

2.2.1 In the first instance the student should approach and discuss their concern with their Course Leader. Italia Conti aims to resolve the issue within 10 working days of being raised. A progress update will be issued at this stage if the complaint cannot be resolved within this timescale.

2.2.2 Should the student be dissatisfied with the level of action proposed at the Informal Stage, the student may decide to proceed with a formal complaint.

2.2 Formal Stage

- 2.3.1 The student should submit a formal written outline of their complaint and the circumstances surrounding it using the Complaints Form (Appendix C) to the Chief Operations Officer (via HR@italiaconti.co.uk) who will investigate the complaint and work towards finding a reasonable resolution.
- 2.3.2 The Chief Operations Officer will acknowledge the receipt of the complaint within 3 working days, inform the relevant member (s) of staff that a complaint has been lodged and consider the complaints based on the evidence provided and discussions deemed appropriate.
- 2.3.3 The Chief Operations Officer will work to establish whether there is good reason for the complaint or if the complaint does not fall within this complaints procedure and requires to be dealt with in another way.
- 2.3.4 Where it has been determined that there is a genuine reason for the complaints, the Chief Operations Officer will arrange for the appropriate action to be taken and communicate this to the student within 20 working days.
- 2.3.5 All complaints, and the outcome of any investigations, will be notified to the Head of Quality so that details can be recorded in the Complaints log.

2.3 Final Stage (Appeal)

- 2.4.1 Where a student is not satisfied that their grievance has been dealt with appropriate, then they should contact the CEO.
- 2.4.2 Complaints should be submitted in writing to the CEO (via HR@italiaconti.co.uk) who will acknowledge the receipt of the complaint within 3 working days, consider the complaint, and review the evidence and previous efforts made to resolve the complaint.
- 2.4.3 Any decision will be communicated to the student in writing within 20 working days.
- 2.4.4 The COO's decision is final.
- 2.4.5 Italia Conti reserves the right to alter these procedures where it is deemed appropriate.
- 2.4.6 Complaint procedures within Italia Conti will be independent of any formal legal proceedings which may develop from the matter in question.
- 2.4.7 All appeals, and the outcome of any appeals,, will be notified to the Head of Quality so that details can be recorded in the Complaints log.

2.4.8

3. Italia Conti FE Parental Complaints Procedure

- 3.1 Italia Conti has long prided itself on the quality of the teaching and pastoral care provided to its pupils. However, if parents do have a complaint, they can expect it to be treated by Italia Conti in accordance with this Procedure.
- 3.2 A copy of this policy is available on the Italia Conti website.
- 3.3 It is hoped that most complaints and concerns will be resolved quickly and informally. Parents can be assured that all concerns and complaints will be treated seriously and confidentially, whether raised informally or formally.
- 3.4 A written record is to be kept of all complaints, and of whether they are resolved at the preliminary stage or proceed to a panel hearing.
- 3.5 Correspondence, statements, and records relating to individual complaints are to be kept confidential except where the Secretary or a body conducting an inspection under section 162A of the 2002 Act requests access to them.

Procedure

3.6 Stage 1 – Informal Resolution

- If parents / carers have a concern or complaint, they should normally contact the Head of Year or Course Leader. In many cases the matter will be resolved straightaway by this means to the parents' satisfaction.
- Italia Conti will take informal concerns and complaints 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.
- Complaints made directly to the Chief Operations Officer (Miranda.Tatton-Brown@italiaconti.co.uk) will usually be referred to the relevant member of staff unless it is deemed appropriate for them to deal with the matter personally.
- The member of staff receiving the complaint 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 ten working days (term time) or in the event that the member of staff 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 Procedure.

3.7 Stage 2 – Formal Resolution

- If the complaint cannot be resolved on an informal basis, then the parent / carer should put their complaint in writing to the Chief Operations Officer, using the Complaints Form (Appendix C). The Chief Operations Officer will decide, after considering the complaint, the appropriate course of action to take; this may include allocating an investigating officer.

- In most cases the investigating officer will meet/speak to the parent/ carer concerned, normally within ten working days (term time) of receiving the complaint to discuss the matter. If possible, a resolution will be reached at this stage. It may be necessary for the investigating officer to carry out further investigations.
- The investigating officer will keep written records of all meetings and interviews held in relation to the complaint and at which stage the complaint was at when it was resolved or not resolved at all.
- Once the investigating officer is satisfied that, so far as is practicable, all the relevant facts have been established, a decision will be made, and parents will be informed of this decision in writing.
- The investigating officer will also give reasons for their decision. If the parent / carer are still not satisfied with the decision, they should proceed to Stage 3 of this Procedure.

3.8 Stage 3 – Panel Hearing

- If parents seek to invoke Stage 3 (following a failure to reach an earlier resolution) they should contact the CEO: Hayley Newton (via HR@italiaconti.co.uk) / 020 7608 0044).
- The matter will then be referred to the Complaints Panel for consideration. The Panel will consist of at least three persons not directly involved in the matter detailed in the complaint, one of whom shall be independent of the management and running of Italia Conti. Each of the Panel members shall be appointed by the CEO.
- The CEO, on behalf of the Panel, will then acknowledge the complaint and schedule a hearing to take place as soon as practicable and normally within ten (10) working days (term time).
- If 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. Copies of such particulars shall be supplied to all parties not later than seven working days prior to the hearing.
- The parent(s) / carer(s) may be accompanied to the hearing by one other person. This may be a relative, teacher or friend. Legal representation will not normally be appropriate.
- If possible, the Panel will resolve the parent/ carer's complaint immediately 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 all facts, they consider relevant, the Panel will reach a decision and may make recommendations which it shall complete within ten (10) working days (term time) of the Hearing.
- A copy of findings will be provided to the complainant and, where relevant, to the person complained about and will be available for inspection on the school premises by the CEO.

4. Italia Conti HE Complaints Procedure

4.1 Purpose

The Student Complaint procedure is designed to provide a clear step-by-step process through which a student may, without adversely affecting his/her position on the course, pursue legitimate complaints with respect to any aspect of the teaching and general treatment pertaining to the relevant HE programme. Students are reminded that only by following the procedure outlined below can they expect a full and satisfactory outcome to any complaint process.

Many complaints can be resolved at an informal and / or local level. Italia Conti strongly encourages resolution of this kind, and those wishing to make representation under this procedure will be expected to have pursued informal resolution prior to bringing a formal complaint.

4.2 Core Principles

In consideration of a reasonable complaint Italia Conti will adhere to the following principles:

- All complaints will be treated fairly, impartially, and effectively.
- All complaints will be treated seriously and constructively and can be made without fear of victimisation.

4.2.1 A legitimate complaint is defined as a justified concern regarding any aspect of the teaching, learning process, or general treatment of students by members of staff which appears to fall below the standard which students can reasonably expect while studying on their course.

4.2.2 Unsatisfactory treatment of one student by another will be dealt with through the Disciplinary Procedure in the first instance. Italia Conti may instigate proceedings as it sees fit without the dissatisfied student being required to make a formal complaint.

4.2.3 Suggestions for alterations or improvements to the content or delivery of the course, or to the general conditions in the building, do not constitute a complaint matter, and should be reported through the student representatives to the Course Committee Meeting.

4.2.4 Dissatisfaction with grades/assessments constitutes an academic matter and should be dealt with through the appeals procedure outlined in the Academic Regulations and Academic Appeals Procedures in the programme document. It should be noted that a student cannot appeal against academic judgement.

4.2.5 Dissatisfaction with the outcome of an Extenuation Panel should be dealt with via the Academic Appeals procedure.

4.2.6 If a student has a legitimate complaint, he/she should in the first instance report the matter verbally, in confidence, to their Head of Year and Course Leader. This will normally constitute an informal complaint. Wherever possible the Course Leader will seek to resolve the problem informally.

4.2.7 Legitimate complaints fall into a wide range of categories and may include:

- Victimisation
- Sexual harassment.

- Any other form of harassment, including inappropriate expression of religious, political, or other beliefs, or persistent and unwelcome attempts to recruit a student to any organisation or cult.
- Insulting or offensive behaviour, including that which displays insensitivity to a student's own beliefs or culture. (Students should note, however, that aspects of the Programme which reasonably introduce views or opinions other than their own cannot be seen as grounds for legitimate complaint.)
- Any form of physical assault.
- Persistent unreasonable physical or psychological demands made on a student or group of students by a member of staff, where the member of staff could reasonably have been expected to be aware of a student's temporary or permanent inability to undertake an activity, or of the general inappropriateness of the activity.
- Any form of financial dealing or transaction between a member of staff and a student other than relevant private tuition or other programme related costs without the prior knowledge and consent of the Course Leader. Any other unreasonable behaviour by a member of staff which can be shown to have adversely affected either the professional nature of the staff/student relationship, or the progress of the student on the course.

4.3 Stage 1: Informal or local resolution

Italia Conti aims to resolve the issue within 10 working days of being raised. A progress update will be issued at this stage if the complaint cannot be resolved within this timescale.

The Course Leader will respond to the complaint, and provide a written response, which will

- Detail the proposed resolution
- If there is no resolution, explain the reasons for this.
- Confirm whether the student has a legitimate complaint.

Proposed actions may include:

- No action upon this occasion
- Discussion of the complaint matter with the member of staff concerned, with or without the Course Leader being present, as appropriate.
- Informal action by the Course Leader - normally discussion with the member of staff concerned or relevant line-manager, as appropriate.
- Formal action by the student. This will involve the student making a formal complaint in writing to the Chief Operations Officer via HR@italiaconti.co.uk.

4.4 Stage 2 Formal Complaint

- The student should submit a formal written outline of their complaint and the circumstances surrounding it to the Chief Operations Officer via HR@italiaconti.co.uk, who will delegate them for and work towards finding a reasonable resolution.
- The formal complaint should be submitted in writing to the Chief Operations Officer who will acknowledge the receipt of the complaint within 3 working days, inform the relevant member(s) of staff that a complaint has been lodged and consider the complaints based on the evidence provided and discussions deemed appropriate.
- The Chief Operations Officer may delegate complaints as appropriate. As a guide this may be:

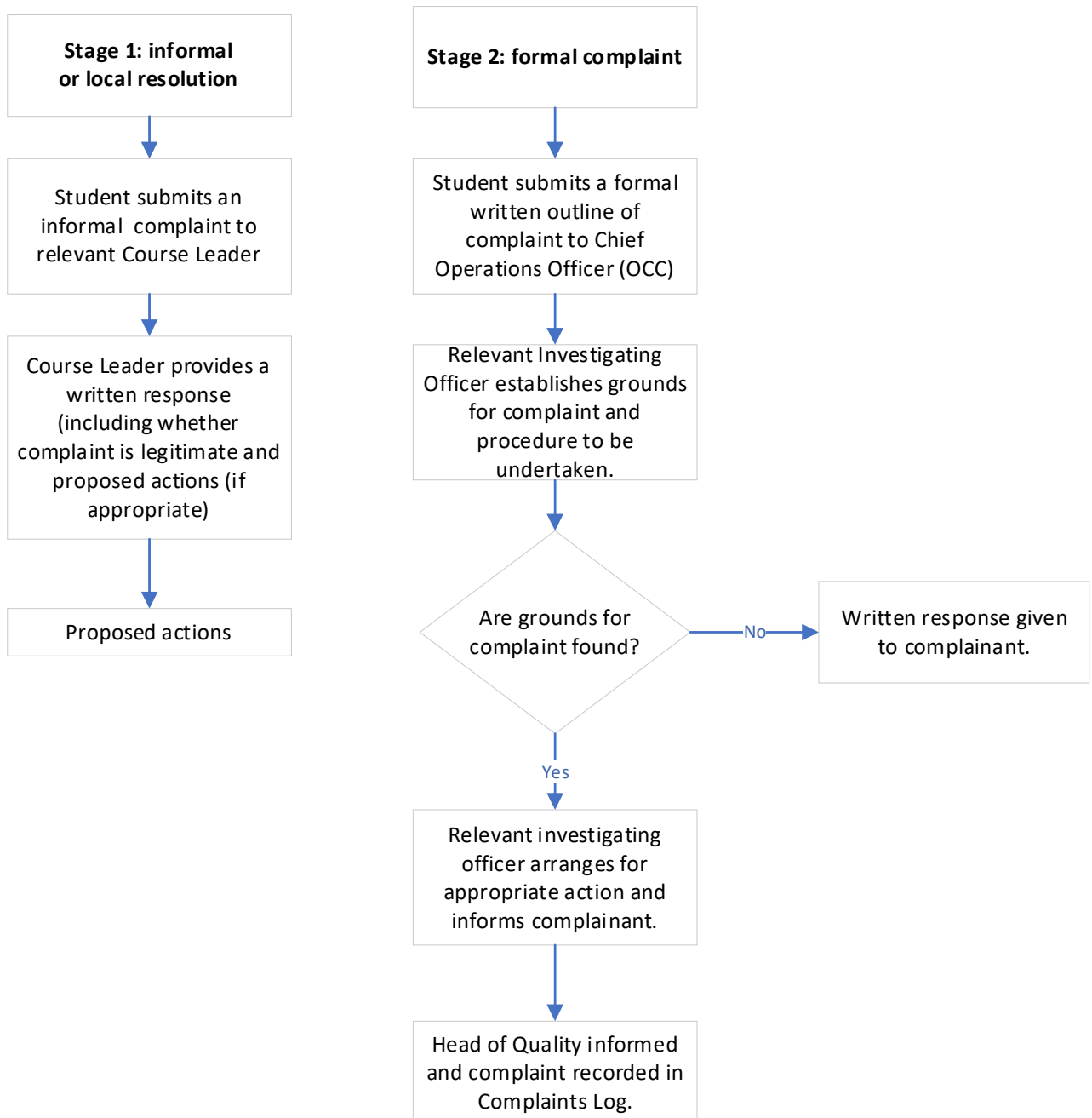
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- Complaints about staff: CEO / HR
 - Complaints about curriculum: relevant Course Leader
 - Other issues: Senior Leadership Team
 - Complaints about the Senior Leadership Team or CEO: Governors
- The relevant investigating officer will work to establish whether or not there are grounds for the complaint or if the complaint does not fall within this complaints procedure and requires to be dealt with in another way.
 - Where it has been determined that there is a genuine reason for the complaint, the relevant investigating officer will arrange for the appropriate action to be taken and communicate this to the student in writing within 20 days.
 - All complaints, and the outcome of any investigations, will be notified to the Head of Quality so that details can be recorded in the Complaints log.
- 2) No student should involve him/herself in another student's complaint unless they are directly implicated as co-party or witness or is asked to do so in their capacity as one of the elected student representatives. No complaint can be made on behalf of a third party.
 - 3) Students involved in a complaint procedure are expected to avoid discussion of the matter with other students or outsiders.
 - 4) Where a member of staff is perceived by the relevant investigating officer to be failing to meet the required standards of professionalism demanded by Italia Conti, the CEO will take immediate and appropriate action in accordance with the Staff disciplinary procedure. The student concerned, or other students directly implicated, may be asked to produce further written statements, as part of any action taken by the Italia Conti.
 - 5) Where the investigating officer has no reason to believe that there are grounds for action following a formal complaint, he/she will make such reason clear to the student in writing, according to the Staff and Student Codes of Conduct.
 - 6) Where the investigating officer upholds the complaint and finds there are grounds for action, he/she will provide a formal response to the student and with the COO.
 - 7) Where a formal course of action taken by the investigating officer proves unsuccessful in eliminating a problem, a student should make direct representation in writing to the CEO via HR@italiaconti.co.uk
 - 8) When such a direct representation is received, the CEO will acknowledge the receipt of the complaint within three working days, consider the complaint, and review the evidence and previous efforts made to resolve the complaint. A decision will be communicated to the student in writing within 20 working days.
 - 9) Students are reminded that although they are welcome to involve one of their elected student representatives in complaint procedures, they cannot invite parents to speak or make statements on their behalf. This reflects students' status as independent adults on the programme.

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- 10) Italia Conti reserves the right to alter these procedures where it is deemed appropriate.
- 11) Complaint procedures within Italia Conti will be independent of any formal legal proceedings which may ensue from the matters in question.
- 12) Where the complaint cannot be resolved by Italia Conti's internal processes, or where UEL is the more appropriate conduit for the student complaint then the procedure is outlined in this handbook**
- 13) Further advice on the procedures of UEL, and advice on how to access them is available via www.uel.ac.uk/qa/studentsarea/studentcomplaints, (*appendix A*).
- 14) As a final resort, students are able to take their unresolved complaints to the Office of the Independent Adjudicator (OIA) which is the designated operator of the complaints handling scheme for higher education students. Further details and advice can be found on www.oiahe.org.uk.

Appendix A: Summary of dealing with complaints



If a formal complaint is made, Stage 2 of the process is automatically invoked.

Appendix B: Complaint Form

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Please complete and return to the Chief Operations Officer via HR@italiaconti.co.uk, who will acknowledge receipt and explain what action will be taken. You will need to complete this form in order to move a complaint from stage 1 to stage 2.

Your name:
Your student number (if relevant)
Your contact details:
Address:
Postcode:
Day time telephone number:
Evening telephone number:
Email address:

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Please give details of your complaint, including whether you have already spoken to anybody at Italia Conti about it.

What actions do you feel might resolve the problem at this stage?

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Are you attaching any paperwork? If so, please give details.
Signature:
Date:
Official use
Date acknowledgement sent:
By whom:
Complaint referred to:
Date:

Please return this form to HR@italiaconti.co.uk, marked for the attention of the Chief Operations Officer.

Appendix C: Unacceptable behaviour

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Policy on Unacceptable Behaviour

The Complaints Panel recognises that it is the last resort for complainants. They also have a duty to ensure the safety and welfare of students, parents, and staff.

The Complaints Panel is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who make them. As part of this service, it would not normally limit the contact complainants have. However, the Complaints Panel does not expect Italia Conti's staff to tolerate behaviour by complainants, which is unacceptable, for example, which is abusive, offensive, or threatening, and it will act to protect staff from that behaviour. This applies to unacceptable behaviour on any part of Italia Conti premises.

If the Principal considers that a complainant's behaviour is unacceptable the complainant will be told why their behaviour is deemed to be unreasonable and will be asked to change it. If the unacceptable behaviour continues the Chief Operations Director/ CEO will act to restrict the complainant's contact with Italia Conti.

Unacceptable actions and behaviours

These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which Italia Conti often find problematic. It is by no means an exhaustive list and local factors may vary, but these are examples that frequently come to our attention.

- Foul and abusive language towards staff, other parents, and students.
- Behaviour that staff consider to be harassing and intimidating, including in person, over the telephone, or any other type of communication.
- Undermining Italia Conti policies by actively encouraging students to ignore staff requests.
- Making unnecessarily excessive demands on the time and resources of staff, by for example excessive telephoning or sending emails to numerous staff, writing lengthy complex letters every few days and expecting immediate responses.
- of some or all of these.

The decision to restrict access to Italia Conti will normally be taken by the CEO.

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Any restrictions imposed will be appropriate and proportionate. The options most likely to be considered are:

- Requesting contact in a particular form (for example, letters only) ;
- Requiring contact to take place with a named member of staff;
- Restricting telephone calls to specified days and times; and/or
- Asking the complainant to enter into an agreement about their conduct.

In all cases we will write to tell the complainant why we believe his or her behaviour is unacceptable, what action we are taking and the duration of that action. Where a complainant continues to behave in a way which is unacceptable, we may decide to terminate contact with that complainant and discontinue any investigation into their complaint. However, the Complaints Panel will seek to limit any detriment to any students who attend Italia Conti, as far as is reasonable within these circumstances e.g. access to parents' evenings, newsletters, and any other correspondence.

Where the behaviour is so extreme that it threatens the immediate safety and welfare of Italia Conti's staff, we will consider other options, for example reporting the matter to the police or taking legal action. In such cases, we may not give the complainant warning of that action.

Appendix D: persistent complainants

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Policy on unreasonably persistent complainants

Italia Conti recognises that it is the last resort for complainants and is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who make them. As part of this service, it does not normally limit the contact complainants have with the organisation.

However, there are a small number of complainants who, because of their frequent contact with the academy, hinder consideration of their or other people's, complaints. Such complainants are referred to as 'unreasonably persistent complainants' and, exceptionally, the Chief Operations Officer/ Principal will take action to limit their contact with Italia Conti.

Actions and behaviours of unreasonable and unreasonably persistent complainants

These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which schools often find problematic. It is by no means an exhaustive list and factors may vary, but they are examples that may come to our attention:

- **refusing** to specify the grounds of a complaint, despite offers of assistance with this from the Italia Conti's staff
- **refusing** to co-operate with the complaints investigation process while still wishing their complaint to be resolved
- **refusing** to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure's scope
- **insisting** on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice
- **Making** what appear to be groundless complaints about the staff dealing with the complaints and seeking to have them replaced
- **Changing** the basis of the complaint as the investigation proceeds and/or denying statements he or she made at an earlier stage
- **Introducing** new information which the complainant expects to be considered and commented on or raising large numbers of detailed questions which time are particularly consuming and costly to respond to and insisting they are all fully answered
- **Electronically** recording meetings and conversations without the prior knowledge and consent of the other persons involved

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- **Adopting** a 'scattergun' approach: pursuing a complaint or complaints with the academy and, at the same time, with a Member of Parliament/a councillor/the authority's independent auditor/the Local Authority/local police/solicitors/the Ombudsman / OFSTED/ ISA
- **Making** unnecessarily excessive demands on the time and resources of staff whilst a complaint is being investigated, by for example excessive telephoning or sending emails to numerous academy staff, writing lengthy complex letters every few days and expecting immediate responses.
- **Submitting** repeat complaints, after complaints processes have been completed, essentially about the same issues, with additions/variations which the complainant insists make these 'new' complaints which should be put through the full complaints procedure
- **Refusing** to accept the decision – repeatedly arguing the point and complaining about the decision
- **Combinations of** some, or all, of these.

The decision to restrict access to Italia Conti will be taken by the Principal and will normally follow a warning to the complainant. Any restrictions imposed will be appropriate and proportionate. The options we are most likely to consider are:

- requesting contact in a specific form (for example, letters only) ;
- requiring contact to take place with a named member of staff;
- restricting telephone calls to specified days and times, ; and/or
- asking the complainant to enter into an agreement about their future contacts with us.

In all cases where we decide to treat someone as an unreasonably persistent complainant, we will write to tell the complainant why we believe his or her behaviour falls into that category, what action we are taking and the duration of that action. We will also tell them how they can challenge the decision if they disagree with it. If we decide to carry on treating someone as an unreasonably persistent complainant and we are still investigating their complaint six months later, we will carry out a review and decide if restrictions will continue.

Where a complainant whose case is closed persists in communicating with us about it, we may decide to terminate contact with that complainant. In such cases, we will read all correspondence from that complainant, but unless there is fresh evidence which affects our decision on the complaint, we will simply acknowledge it or place it on the file with no acknowledgement.

New complaints from people who have come under the unreasonably persistent complainant's policy will be treated on a case-by-case basis.

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