

Committee	Date
City of London Academies Trust Board	10 September 2021
Subject: Policies for the Trust	Public
Report of: Claire Hersey, CFO	For Decision
FOR PUBLICATION	
Summary The Trust has a suite of key policies which should be reviewed regularly to ensure they remain appropriate for the Trust's current operations and provide consistency across the Trust where possible.	

Recommendations

The Trustees are asked to approve the following policies:

- Safeguarding and Child Protection
- Complaints Procedures - addition
- Freedom of Information
- Data Protection
- Records Retention

Main Report

Overview

The Trust has a suite of key policies which should be reviewed regularly to ensure they remain appropriate for the Trust's current operations and provide consistency across the Trust where possible.

The documents have been written with the aim of providing policies only (i.e. what should be done) at a Trust level so that processes and procedures (i.e. how it should be done) can be determined locally according to the needs, resources and structure in each of the individual academies.

Safeguarding policy

Trustees must ensure that arrangements are made to safeguard and promote the welfare of children in all Trust Academies in line with their duty as 'proprietors' under the Education (Independent School Standards) Regulations 2014. With this in mind, the overall responsibility for the Trust's safeguarding policy sits with the Board of Trustees. However, each academy must have their own local safeguarding and child protection policy, outlining how the academy delivers safeguarding at a local level, which is reviewed on an annual basis by the Local Governing Body. This means that each academy can tailor its safeguarding approach to meet the needs of its pupils (e.g. differences between primary and secondary) and to comply with the guidance and the arrangements and

procedures agreed and published by the 3 safeguarding partners in the local authority where it's located.

Complaints Procedure

A Trust-wide complaints procedure was approved by Trustees at the meeting in July 2021. Subsequent to this meeting a further section has been added to address persistent and duplicate complaints. This extract is copied below.

Other policies

The following policies have been reviewed and updated and the updated policies, attached as appendices to this paper, provide Trust-wide guidance and procedures to ensure consistency across all the academies. The updates are trivial:

- Freedom of Information Policy
- Data Protection Policy
- Records Retention

Recommendations

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Appendices

- Safeguarding and Child Protection Policy
- Freedom of Information Policy
- Data Protection Policy
- Records Retention Policy

Complaints Procedures - addition

1. Persistent complaints

Where a complainant tries to re-open the issue with the school after the complaints procedure has been fully exhausted and the school has done everything it reasonably can in response to the complaint the CEO of the Multi Academy Trust will inform the complainant that the matter is closed. Most complaints raised will be valid, and therefore we will treat them seriously. However, a complaint may become unreasonable if the person:

- *Has made the same complaint before, and it's already been resolved by following the school's complaints procedure*
- *Makes a complaint that is obsessive, persistent, harassing, prolific, defamatory or repetitive*
- *Knowingly provides falsified information*
- *Insists on pursuing a complaint that is unfounded, or out of scope of the complaint's procedure*
- *Refuses to co-operate with the complaint's investigation process*

- *Pursues a valid complaint, but in an unreasonable manner e.g. refuses to articulate the complaint, refuses to co-operate with this complaints procedure, or insists that the complaint is dealt with in ways that are incompatible with this procedure and the time frames it sets out*
- *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*
- *Introduces trivial or irrelevant information which they expect to be considered and commented on*
- *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*
- *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 the Department for Education*
- *Uses threats to intimidate*
- *Uses abusive, offensive or discriminatory language or violence*
- *Publishes unacceptable information on social media or other public forums*

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. We will maintain our role as an objective arbiter throughout the process, including when we meet with individuals. We will follow our complaints procedure as normal (as outlined above) wherever possible.

If the complainant continues to contact the school in a disruptive way, we may put communications strategies in place. We may:

- *Give the complainant a single point of contact via an email address*
- *Limit the number of times the complainant can make contact, such as a fixed number per term*
- *Ask the complainant to engage a third party to act on their behalf*
- *Put any other strategy in place as necessary*

We may then 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*
- *The complainant contacts us repeatedly, and we believe their intention is to cause disruption or inconvenience*

Where we stop responding, we will inform the individual that we intend to do so. We will also explain that we will still consider any new complaints they make.

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.

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 had not previously considered, or any new information we need 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 the local process is complete*
 - *Direct them to the DfE if they are dissatisfied with our original handling of the complaint*
- If there are new aspects, only then will we follow this procedure again.*

Complaint campaigns

Where the school receives a large volume of complaints about the same topic or subject, especially if these come from complainants unconnected with the school, the school may respond to these complaints by:

- *Publishing a single response on the school website*
- *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.