

## **Complaints Policy**

**In all its dealings with international students and their families and UK schools, Oxford Guardians (OG) will follow the general standards laid out by The Association for the Education and Guardianship of International Students (AEGIS) in their Code of Practice, which are as follows:**

- To promote and provide best and legal practice in the guardianship and hosting of all international students at schools, colleges and universities, particularly those under 18 years of age.
- To respect and support the rights, religions and customs of the international student.
- To uphold the stated ethos and values of the school attended by students in our guardianship.
- To comply with the Children Acts 1989 and 2004 and the Education Act (2002) and adhere to the guidance of the Keeping Children Safe in Education 2024 (KCSIE) updated September 2024.
- To ensure all international students have 24 hour emergency contact with a responsible adult in the UK.
- To put in place arrangements which maintain appropriate contact with the international student, the overseas parents and guardianship family and to ensure all appropriate records are up to date.
- To provide both pastoral and educational support as outlined in any literature and agreements.
- To adhere to the AEGIS grievance procedures.
- To have appropriate insurance for guardianship arrangements and to comply with UK legislation.

## Contents

<b>Complaints Policy .....</b>	<b>1</b>
Glossary of terms used in this Policy .....	2
Glossary of acronyms used in this Policy .....	2
Oxford Guardians' Complaints Policy .....	3
Section 1.0: Policy Aims .....	3
Section 2.0: Roles and Responsibilities .....	3
2.1 Oxford Guardians' Directors/Senior Management .....	3
2.2 Independent Hearing Panel .....	4
2.3 Oxford Guardians' Associates and other staff .....	5
2.4 Students and Parents .....	6
Section 3.0: Complaints Procedure .....	6
Section 4.0: Monitoring, Evaluation and Review .....	7

## Glossary of terms used in this Policy

Term	Definition
Child	A student under the age of 18
Young Person	A student over the age of 18
Parent/carer	The student's parents or carers who reside overseas
Homestay Host	The primary carer in a Homestay placement
Primary Carer	The responsible adult who takes responsibility for the student whilst they are staying in their Homestay placement
Homestay Family	The family unit comprising all members of the family who normally live in the Homestay placement
Local Guardian	The Oxford Guardians' lead person for a geographical area in which there are students attending school
Staff	Anyone carrying out work for Oxford Guardians – can be a Homestay Host, a Local Guardian or someone who carries out an administrative role

## Glossary of acronyms used in this Policy

Term	Definition
AEGIS	Association for the Education and Guardianship of International Students
OG	Oxford Guardians

## Oxford Guardians' Complaints Policy

Oxford Guardians' Complaints Policy is linked to our Safeguarding and Child Protection, Behaviour and Staff Conduct Policies and should be read in conjunction with these documents.

This policy has been developed in accordance with the principles established by the School Standards and Framework Act which sets out the statutory duty for schools to have in place clear procedures to deal with any complaints made against them or against individuals connected with them and to publish their complaints procedures in the school handbook and on the school website. We believe these practices are as relevant to a Guardianship organisation as they are to a school.

The Directors of Oxford Guardians and OG staff are committed to building positive relationships with all students, parents and schools and we believe that we can minimise complaints by forging strong working relationships with all our stakeholders and by maintaining excellent lines of communication, both internally and externally. Where possible, we will always strive to resolve a complaint promptly and informally when it is first received.

To ensure that this policy is effective on a day-to-day basis, OG Directors/Senior Management will review at least annually the systems that are in place in relation to handling complaints.

We are committed to providing a caring, positive, safe and stimulating environment that complements the educational provision the children in our care access whilst they are at school in the UK. Our ethos reflects the articles laid out in the [United Nations Convention on the Rights of the Child](#) (UNCRC) which underpin all aspects of the support we offer to the children in our care.

### Section 1.0: Policy Aims

1.1 To deal with any complaint against Oxford Guardians or any individual connected with it by following the correct, documented procedures.

To deal with all complaints thoroughly, in a timely manner and by being open, honest and fair when dealing with the complainant.

### Section 2.0: Roles and Responsibilities

#### 2.1 Oxford Guardians' Directors/Senior Management

2.1.1 OG Directors/Senior Management have a duty to have in place a complaints procedure and to make this available to all stakeholders via its handbooks and via its website.

2.1.2 OG Directors are responsible for ensuring that all OG staff, students and parents are aware of and comply with this Policy.

2.1.3 OG Directors are responsible for setting deadlines for each stage of the complaints handling process to ensure that all complaints are dealt with in a prompt and efficient manner.

2.1.4 OG Directors/Senior Management aim to ensure that, where possible, complaints are resolved promptly and informally at the time the complaint is first made. In many cases, this should help avoid a more formal, written complaint being made.

2.1.5 On receipt of a complaint, OG Directors/Senior Management will make contact with the complainant within 24 hours and will respond to complaints received in writing within 7 days of receipt.

2.1.5 OG Directors/Senior Management will ensure that details of all complaints are recorded and that records of the complaint are kept confidential and held in accordance with the principles of the Data Protection Act (see OG Safer Recruitment Policy, which includes Data Protection, for details). Complaint records are held in a password protected subfolder together with similarly protected safeguarding records in the Company Dropbox.

2.1.6 OG Directors/Senior Management will ensure that where a complaint is made against an OG Director/Senior Manager that an Independent Hearing Panel is convened to deal with the complaint. This panel will include OG staff members who have had no connection with the complaint and at least one person who has no connection with the running of Oxford Guardians.

2.1.7 Should this process fail to bring about a resolution and have the potential for reputational harm the documented complaint will be referred to AEGIS and the complainant informed.

## 2.2 Independent Hearing Panel

The Independent Hearing Panel is authorised by OG Directors to deal with complaints in the event that the complainant is not satisfied with the way their complaint has been handled in the first instance or with the resolution.

The Independent Hearing Panel exists also to deal with complaints made against OG Directors/Senior Management.

It will:

- consist of a minimum of three individuals, all of whom have had no connection with the complaint or prior contact with the complainant
- include at least one individual who has no connection with the running or management of Oxford Guardians

2.2.1 When dealing with a complaint, the Independent Hearing Panel will invite parents or guardians, where appropriate, to attend the Hearing with the complainant.

2.2.2 The Independent Hearing Panel will give 21 days' notice of a Hearing to all parties involved, including parents and will work to the timescales set out in this policy.

2.2.3 Where parents are not able to attend a Hearing in person, provision may be made for them to attend remotely e.g. via Skype or FaceTime or conference call.

2.2.4 Copies of the Independent Hearing Panel's findings and recommendations will be provided to the complainant, the individual(s) who is/are the subject of the complaint, OG Directors and Senior Management

2.2.5 The Independent Hearing Panel will notify a complainant of their decision in writing within 7 days of a Hearing.

2.2.6 Members of the Independent Hearing Panel will maintain confidentiality in relation to handling a complaint.

2.2.7 As stated at 2.1.7 above in the event this process fails to bring about a resolution and has the potential for reputational harm the documented complaint will be referred to AEGIS for information.

## 2.3 Oxford Guardians' Associates and other staff

2.3.1 All OG associates/staff will be made aware of the complaints policy during their induction and will be given access to it.

2.3.2 All OG associates/staff know that if they receive a complaint they should immediately log it in an ILP report and alert OG Directors/Senior Management who will open a complaints log

2.3.3 Where the OG associates/staff member who receives the complaint is able to resolve it, details of the resolution should be added to the Complaints Log and OG Directors/Senior Management should be informed.

2.3.4 Where the OG associate/staff member who receives the complaint is not able to resolve it, they should know how and where to direct the complaint.

2.3.5 All OG associates/staff should understand that in the event of them receiving a complaint against Senior Management, it must be passed to OG Directors.

2.3.6 All OG associates/staff should be prepared to act as an advocate for an OG student should the student not be prepared to take their complaint to the appropriate person themselves. OG associates/staff should continue to support the student through the Complaints Handling process until a satisfactory resolution has been achieved.

2.3.7 All OG associates/staff should know that they too are covered by this policy and they should follow the procedures set out in this document if they want to make a complaint about

an aspect of their work with Oxford Guardians, including a complaint against another member of OG staff.

## 2.4 Students and Parents

2.4.1 Students in the care of Oxford Guardians and their parents should be made aware of how to access the Complaints Policy if required.

2.4.2 Students and parents should be made aware of how to make a complaint, should they have one.

2.4.3 Students should know that OG associates/staff can act as an intermediary on their behalf should they feel unable to deal with the complaint themselves.

2.4.4 Where the Hearing relates to a complaint that affects them, students and parents should understand they have a right to attend an Independent Panel Hearing if they wish.

2.4.5 Students and parents should understand they have a right to be accompanied to an Independent Panel Hearing if they wish.

## Section 3.0: Complaints Procedure

Throughout the complaints procedure, sensitivity will be shown and support provided to students or parents who find it difficult to express concerns due to their English language skills.

The OG complaints process comprises three stages. When a complaint is first made, every effort will be made to first resolve it informally and promptly with the appropriate member of staff. This is Stage 1.

### **In Stage 1, the OG associate or member of staff receiving the complaint will:**

- notify OG Directors/Senior Management of the complaint within 24 hours of it occurring via ILP student records if it involves a student or encrypted email if something else
- endeavour to first resolve the complaint informally through discussion and negotiation with the complainant and any other parties involved
- have 24 hours/one working day to respond to the complainant
- if the complainant is a student, record both the complaint and the proposed solution on the student's ILP records as appropriate
- If the complainant is dissatisfied with the response, arrange for an OG Director to take on the complaint (Stage 2) and inform the complainant of the arrangement and what will happen next.

### **In Stage 2, Senior Management will:**

- be notified of the complaint by the OG associates or other member of staff within 24 hours of it occurring
- initiate the OG Complaints Log

- endeavour to first resolve the complaint informally
- respond to a complainant as soon as practical and usually within 3 working days
- ask the complainant to contact the OG Directors in writing in the event that the complainant is dissatisfied with the OG Director's response (Stage 3).

Note that where a complaint is made against an OG Director, the process will be dealt with by a member of the Independent Hearing Panel who will:

- endeavour to resolve the complaint informally
- investigate and report back to OG Directors and the complainant within 7 days
- if the complaint is not resolved informally pass it to the Independent Hearing Panel (Stage 4)
- update the Complaints Log

**In Stage 3, OG Directors will:**

- be notified of the complaint in writing within 7 days of the Senior Manager's initial response
- have 7 days to respond to a complainant
- direct unresolved complaints to the Independent Hearing Panel
- update the Complaints Log

**In Stage 4, the Independent Hearing Panel will:**

- consist of one member who has no connection with the management of Oxford Guardians
- consist of individuals who have no previous involvement or experience of the complaint
- be notified of the complaint in writing within 7 days of the OG Director's response
- give the complainant 21 days' notice of a Hearing
- invite a parent or guardian or their representative to join the complainant
- have 7 days to respond to a complainant following the Hearing
- direct unresolved complaints to appeal to AEGIS
- update the Complaints Log

## Section 4.0: Monitoring, Evaluation and Review

Oxford Guardians' Complaints Policy will be monitored and evaluated by:

- Scrutiny of records of complaints
- Reviews of induction procedures for new students and parents
- Reviews of induction procedures for new staff
- Reviews of Handbooks

- Reviews of Student Feedback at the end of their period of guardianship

The policy will also be reconsidered where complaints are raised by members of the Oxford Guardians team, by students and/or by families.

Reviewed By	Appointment	Date
KT Bacon	DSL	26 Dec 2024

Reviewed By	Appointment	Date
LA Dyer	DDSL	5 Jan 2025