



COMPLAINTS POLICY

EXCLUSIONS

This policy applies to all concerns and complaints relating to Southmoor Multi Academy Trust (the **Trust**) other than as follows, where separate policies apply:

- **Child protection issues;**
- **Exclusions;**
- **School admission;**
- **Services provided by other suppliers who use facilities or premises of schools within the Trust** (who will have their own policies in place and such complaints will not be handled by the Trust);
- **Staff conduct complaints;**
- **Staff grievances;**
- **Statutory assessment of SEN;**
- **Whistleblowing; and**
- **Withdrawals from the curriculum.**

This policy complies with Schedule 1, Part 7 of the Education (Independent School Standards) (England) Regulations 2014.

POLICY AIM

The aim of this policy is to ensure that a concern or complaint by a parent/carer or member of the public is managed sympathetically, efficiently and at the appropriate level and resolved as soon as possible. Doing so is good practice, it is fair to those concerned and it helps to promote parents' and students' confidence in our ability to safeguard and promote welfare. We will try to resolve every concern or complaint in a positive way with the aim of resolving the issue in a transparent manner.

The Trust expects that most concerns can be resolved informally and guarantees to treat seriously and confidentially all concerns whether raised informally (usually in a meeting or telephone conversation with the complainant) or formally (where it is put in writing).

STATEMENT

We need to know as soon as possible if there is any cause for dissatisfaction. We recognise that a difficulty that is not resolved quickly and fairly can soon become a cause of resentment, which could be damaging to relationships and also to our academy culture. We intend that parents and students should never feel – or be made to feel – that a complaint will be taken amiss or will adversely affect a student or his/her opportunities at the Trust. The policy, however, distinguishes between a concern or difficulty which can be resolved informally and a formal complaint which will require further investigation.

TIMESCALES

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

Complaints must be raised within 12 months of the incident or, where a series of associated incidents have occurred, within three months of the last of these incidents. We will consider complaints made outside of this time frame if exceptional circumstances apply.

ENGLISH LANGUAGE REQUIREMENT – IMMIGRATION ACT 2016

A legitimate complaint received in respect of the above, whereby a member of the public feels that a public-facing member of staff has insufficient proficiency in English will be investigated in line with this policy and will adhere to the relevant Code of Practice.

Members of staff subject to the complaint will be notified of the complaint and given an opportunity to give their own account of the incident. A complaint will be assessed against an objective assessment of the level of fluency relevant to the role in question.

A complaint about a member of staff's accent, dialect, manner or tone of communication, origin or nationality will not be considered a legitimate complaint.

STAGE 1: INFORMAL CONCERNS

A concern may be defined as *'an expression of worry or doubt over an issue considered to be important for which reassurances are sought'*.

1. Concerns: Most concerns, where a parent/carer seeks intervention, reconsideration or some other action to be taken, can be resolved informally (in writing or via a phone call). Examples might include dissatisfaction about some aspect of teaching, disciplinary matters or issues outside the classroom. Parents/carers should raise initial general concerns with the subject teacher, Curriculum Leader, Year Leader or Pastoral Lead as appropriate. The Trust will ensure that informal concerns are resolved within 10 working days of being raised.

2. Unresolved concerns: A concern which has not been resolved by informal means within 10 working days from the receipt of the concern can be notified as a formal complaint in accordance with Stage 2 below.

3. Record of concerns: In the case of concerns raised under Stage 1 of this procedure, the only record of the concern and its resolution will be file notes by the person dealing with the concern and/or file correspondence between the person raising the concern and the respondent.

STAGE 2: FORMAL COMPLAINTS

A complaint may be defined as *'an expression of dissatisfaction however made, about actions taken or a lack of action'*.

1. Raising a Formal Complaint: A formal complaint, an unresolved concern under Stage 1, a concern which needs investigation, or a more serious dissatisfaction with some aspect of the Trust's policies, procedures, management or administration must be raised using the Complaints Form attached at Appendix 3, marked as Private and Confidential and submitted via the Complaints Coordinator for the relevant academy. The complainant must state on the Complaints Form why they feel the matter is not resolved and what they feel would be an acceptable resolution.

If the complaint concerns the Chief Executive Officer or a Trustee, the complaint will be investigated by the Chair of the Board of Trustees. If a complaint form is received about the Chair, it will be referred to the Vice Chair for investigation. If a complaint is about a Headteacher, it will be investigated by the Chief Executive Officer.

We will not normally investigate anonymous complaints. However, the CEO, Headteacher or Chair of Trustees, if appropriate, will determine whether the complaint warrants an investigation.

2. Notification: Should a formal written complaint be received by another member of the Trust's staff, this will be passed to the Chief Executive Officer or appropriate Leadership Team colleague as soon as possible.

3. Acknowledgement: The complaint will be acknowledged in writing normally within 3 working days of receipt during term time. The acknowledgement will indicate the action that is being taken and the likely timescale for resolution. We will consider complaints made outside of term time to have been received on the first school day after the holiday period.

4. Investigation and resolution: The Chief Executive Officer may deal with the matter personally or delegate a senior member of staff to act as “investigating officer”. The “investigating officer” may request additional information from the complainant and will fully investigate the issue. In most cases the Chief Executive Officer or investigating officer will communicate with the parent/carer to discuss the matter.

5. Outcome: The aim is to inform any complainant of the outcome of an investigation and the resolution to the complaint within 15 working days from the receipt of the complaint. Please note that any complaint received during a school holiday or within 15 working days of the end of term or half term may take longer to resolve.

6. Record of complaints: Written records will be kept in accordance with the guidance on Record Keeping below.

7. Unresolved Complaints: Where the complainant is not satisfied with the Trust’s response to their complaint they may have their complaint considered by an independent Complaints Panel.

STAGE 3 – COMPLAINT HEARD BY THE COMPLAINTS PANEL

1. Request: A request for a complaint to be heard by a Complaints Panel (an appeal) must be made in writing and within 10 working days of the date of the Trust’s decision made at Stage 2. This request must be made to the Clerk to the Board of Trustees (by letter or e-mail) including a copy of the original written complaint. The request should also indicate which matters remain unresolved as well as a suggested resolution. No new complaint may be included. Correspondence must be sent to Sara Barwick, Clerk to the Board of Trustees, Southmoor Multi Academy Trust, Ryhope Road, Sunderland, SR2 7TF or can alternatively be e-mailed to sara.barwick@southmoormat.co.uk. Upon receipt of the written complaint it will be forwarded to the relevant members of the Board of Trustees.

2. Acknowledgement: Where an appeal is received the Clerk to the Board of Trustees will acknowledge, in writing, receipt of the appeal within 3 working days and inform the complainant of the steps involved in the process. The Clerk to the Board of Trustees will act as Clerk to the Complaints Panel and will be the contact point for the complainant.

3. Complaints Panel Hearing: The Clerk will aim to convene a Complaints Panel Hearing as soon as possible, normally no later than 20 working days after receipt of the Stage 3 request.

4. Complaints Panel Membership: The Complaints Panel will consist of at least three members, including two Trustees on the Board of Trustees who have not previously been involved in the complaint and one Complaints Panel member who is independent of the management and running of the academy which is the subject of the complaint. In deciding the make-up of the Complaints Panel, Trustees need to try and ensure that it is a cross-section of the categories of Trustee and is sensitive to the issues of race, gender and religious affiliation. The Complaints Panel will select its own Chair.

If the complaint is made jointly about the Chair and Vice Chair, the entire Board of Trustees or the majority of the Board of Trustees, the complaint will be heard by a completely independent panel.

Where the complainant feels that the Complaints Panel or any Complaints Panel member may be biased against them they have a right to raise this in writing along with the evidence supporting a bias case. Membership of the Complaints Panel will be made known to the complainant at the time when they are given a hearing date.

5. The Remit of the Complaints Panel: The Complaints Panel can:

- dismiss the complaint in whole or in part;
- uphold the complaint in whole or in part;
- decide on the appropriate action to be taken to resolve the complaint; and/or
- recommend changes to the Trust's systems or procedures to ensure that problems of a similar nature do not recur.

The aim of the hearing, which will be held in private, will always be to resolve the complaint and achieve reconciliation between the Trust and the complainant. The Complaints Panel Chair will ensure that the proceedings are as informal as possible.

6. Attendance: The following are entitled to attend a hearing, submit written evidence and address the Complaints Panel:

- the complainant who may be accompanied by a friend or relative
- the Chief Executive Officer / Headteacher and / or representatives; and
- any other person who the Complaints Panel considers having a reasonable and just interest in the appeal, whose contribution would assist the Complaints Panel in their decision making and as agreed in advance.

7. Evidence: All parties will be given the opportunity to submit written evidence to the Complaints Panel in support of their position including:

- documents;
- chronology and key dates; and
- written statements setting out further detail.

The evidence will be considered by the Complaints Panel along with the initial submission.

All written evidence must be received by the Clerk no later than 5 working days in advance of the Complaints Panel Hearing. The Clerk will distribute the evidence to all parties no later than 3 working days in advance of the Complaints Panel Hearing.

8. Decision: The Complaints Panel will reach a decision, and make any recommendations within 10 working days of the hearing. The decision reached is final.

9. Notification of the Complaints Panel's Decision: The Complaints Panel's findings and recommendations will be sent in writing to the Clerk, to the parents / carers, the Trustees and the Chief Executive Officer / Headteacher and, where relevant, to the person complained about. The panel will ensure that the findings and recommendations will be available for inspection on the school premises by the proprietor and the CEO / Headteacher.

The letter will state the reasons for the decision reached and any recommendations made by the Complaints Panel. The letter will also include details of how to contact the Education and Skills Funding Agency (ESFA) if the complainant is dissatisfied with the way their complaint has been handled by the Trust. Copies of the minutes will also be issued to the complainant, subject to any necessary redactions under the DPA and the GDPR.

RECORD KEEPING

The Trust will keep a record of all complaints, detailing:

- the progress of the complaint and the final outcome;
- whether the case progressed to a Complaints Panel hearing; and

- the action taken by the Trust, regardless of outcome.

The Trust will make sure this data will not be kept longer than is necessary for the immediate purpose of processing and the data will be stored securely.

Correspondence, statements and records relating to individual complaints will be kept confidential except where the Secretary of State or a body conducting an inspection under section 109 of the Education and Skills Act 2008 requests access to them.

There may be occasions where complaints are made or continue to be escalated after a pupil has left the Trust. On changing schools, the pupil's educational record is transferred to the new school and no copies are retained. The school may hold records of complaints separate to their pupil records (while a complaint is ongoing) so that access to them can be maintained.

VEXATIOUS COMPLAINTS

If properly followed, a good complaints procedure will limit the number of complaints that become protracted. However, there will be occasions when, despite all stages of the procedures having been followed, the complainant remains dissatisfied. Please see Appendix 4 and 5 for further details of how such complaints will be dealt with and examples of behaviour which will not be tolerated.

EDUCATION AND SKILLS FUNDING AGENCY (ESFA)

If the complainant believes the Trust did not handle their complaint in accordance with this Complaints Procedure or they acted unlawfully or unreasonably in the exercise of their duties under education law, they can contact the ESFA after they have completed Stage 3. The complainant can refer their complaint directly to the ESFA online at: www.education.gov.uk/contactus, by telephone on 0370 000 2288 or by writing to:

Academy Complaints and Customer Insight Unit
Education and Skills Funding Agency
Cheylesmore House
5 Quinton Road
Coventry
CV1 2WT

The ESFA will not normally reinvestigate the substance of complaints or overturn any decisions made by the Trust. They will consider whether the Trust has adhered to education legislation and any statutory policies connected with the complaint and whether they have followed Part 7 of the Education (Independent School Standards) Regulations 2014.

APPENDIX 1	Checklist for a Complaints Panel Hearing
APPENDIX 2	Roles and responsibilities
APPENDIX 3	Summary of dealing with complaints
APPENDIX 4	Complaint Form
APPENDIX 5	Policy on unacceptable behaviour
APPENDIX 6	Policy on unreasonable complainants

Last review date: 14.04.21

Person Responsible: Chief Executive Officer

APPENDIX 1

CHECKLIST FOR A COMPLAINTS PANEL HEARING

- The hearing is as informal as possible.
- The matters remaining unresolved must be clear to all parties as well as the actions that the complainant feels the Trust should take in order to offer a resolution.
- Witnesses are only required to attend for the part of the hearing in which they give their evidence.
- After introductions, the complainant is invited to explain their complaint and be followed by their witnesses.
- The Chief Executive Officer / Headteacher may question both the complainant and the witnesses after each has spoken.
- The Chief Executive Officer / Headteacher is then invited to explain the Trust / Academy's actions and be followed by the Trust / Academy's witnesses.
- The complainant may question both the Chief Executive Officer / Headteacher and the witnesses after each has spoken.
- The Complaints Panel may ask questions at any point.
- The complainant is then invited to sum up their complaint.
- The Chief Executive Officer / Headteacher is then invited to sum up the Trust or the Academy's actions and response to the complaint.
- Both parties leave together while the Complaints Panel decides on the issues.
- The Chair explains that both parties will hear from the Complaints Panel within a set time-scale.

APPENDIX 2

ROLES AND RESPONSIBILITIES

The Role of the Complainant

- explain the complaint in full as early as possible;
- co-operate with the Trust in seeking a solution to the complaint;
- respond promptly to requests for information or meetings or in agreeing the details of the complaint;
- ask for assistance as needed;
- treat all those involved in the complaint with respect; and
- refrain from publicising the details of their complaint on social media and respect confidentiality.

The Role of the Investigator

The investigator's role is to establish the facts relevant to the complaint by:

- providing a comprehensive, open, transparent and fair consideration of the complaint through:
 - sensitive and thorough interviewing of the complainant to establish what has happened and who has been involved;
 - interviewing staff and children/young people and other people relevant to the complaint;
 - consideration of records and other relevant information; and
 - analysing information;
- liaising with the complainant and the complaints co-ordinator as appropriate to clarify what the complainant feels would put things right;
- conduct interviews with an open mind and be prepared to persist in the questioning;
- keep notes of interviews or arrange for an independent note taker to record minutes of meetings;
- ensure that any papers produced during the investigation are kept securely pending any appeal;
- be mindful of the timescales to respond; and
- prepare a comprehensive report for the Headteacher or Complaints Panel that sets out the facts, identifies solutions and recommends courses of action to resolve problems.

The Role of the Complaints Co-ordinator

- ensure that the complainant is fully updated at each stage of the procedure;
- liaise with staff members, Headteacher, Chief Executive Officer, Chair of Trustees or the Clerk and to ensure the smooth running of the complaints procedure;
- be aware of issues regarding:
 - sharing third party information; and
 - additional support. This may be needed by complainants when making a complaint including interpretation support or where the complainant is a child or young person; and
- keep records.

The Role of the Clerk

All Complaints Panels considering complaints must be clerked. The Clerk would be the contact point for the complainant and be required to:

- ensure that all people involved in the complaint procedure are aware of their legal rights and duties, including any under legislation relating to Trust complaints, education law, the Equality Act 2010, the Freedom of Information Act 2000, the Data Protection Act (DPA) 2018 and the General Data Protection Regulations (GDPR);
- set the date, time and venue of the hearing, ensuring that the dates are convenient to all parties and that the venue and proceedings are accessible;

- collate any written material and send it to the parties in advance of the hearing;
- meet and welcome the parties as they arrive at the hearing;
- record the proceedings;
- circulate the minutes of the Complaints Panel hearing; and
- notify all parties of the Complaints Panel's decisions.

The Role of the Chair of the Board of Trustees or Nominated Trustee

- check that the correct procedure has been followed; and
- if a hearing is appropriate, notify the clerk to arrange the Complaints Panel.

The Role of the Chair of the Complaints Panel

The Chair of the Complaints Panel has a key role, ensuring that:

- both parties are asked (via the Clerk) to provide any additional information relating to the complaint by a specified date in advance of the Complaints Panel hearing;
- the remit of the Complaints Panel is explained to the parties and each party has the opportunity of putting their case without undue interruption;
- the issues are addressed;
- key findings of fact are made;
- complainants who may not be used to speaking at such a hearing are put at ease;
- the hearing is conducted in an informal manner with each party treating the other with respect and courtesy;
- the Complaints Panel is open minded and acting independently;
- no member of the Complaints Panel has a vested interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure;
- each side is given the opportunity to state their case and ask questions;
- written material is seen by everyone in attendance, provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR. If a new issue arises it would be useful to give everyone the opportunity to consider and comment upon it; this may require a short adjournment of the Complaints Panel hearing; and
- the Complaints Panel hearing is minuted.

The Role of the Complaints Panel Member

Complaints Panel members should be aware that:

- the Complaints Panel hearing must be independent and impartial, and should be seen to be so. No governor / trustee may sit on the Complaints Panel if they have had a prior involvement in the complaint or in the circumstances surrounding it;
- the aim of the Complaints Panel hearing should be to resolve the complaint and achieve reconciliation between the Trust and the complainant. We recognise that the complainant might not be satisfied with the outcome if the Complaints Panel hearing does not find in their favour. It may only be possible to establish the facts and make recommendations;
- many complainants will feel nervous and inhibited in a formal setting. Parents/carers often feel emotional when discussing an issue that affects their child;
- extra care needs to be taken when the complainant is a child/young person and present during all or part of the Complaints Panel hearing; and
- the welfare of the child/young person is paramount.

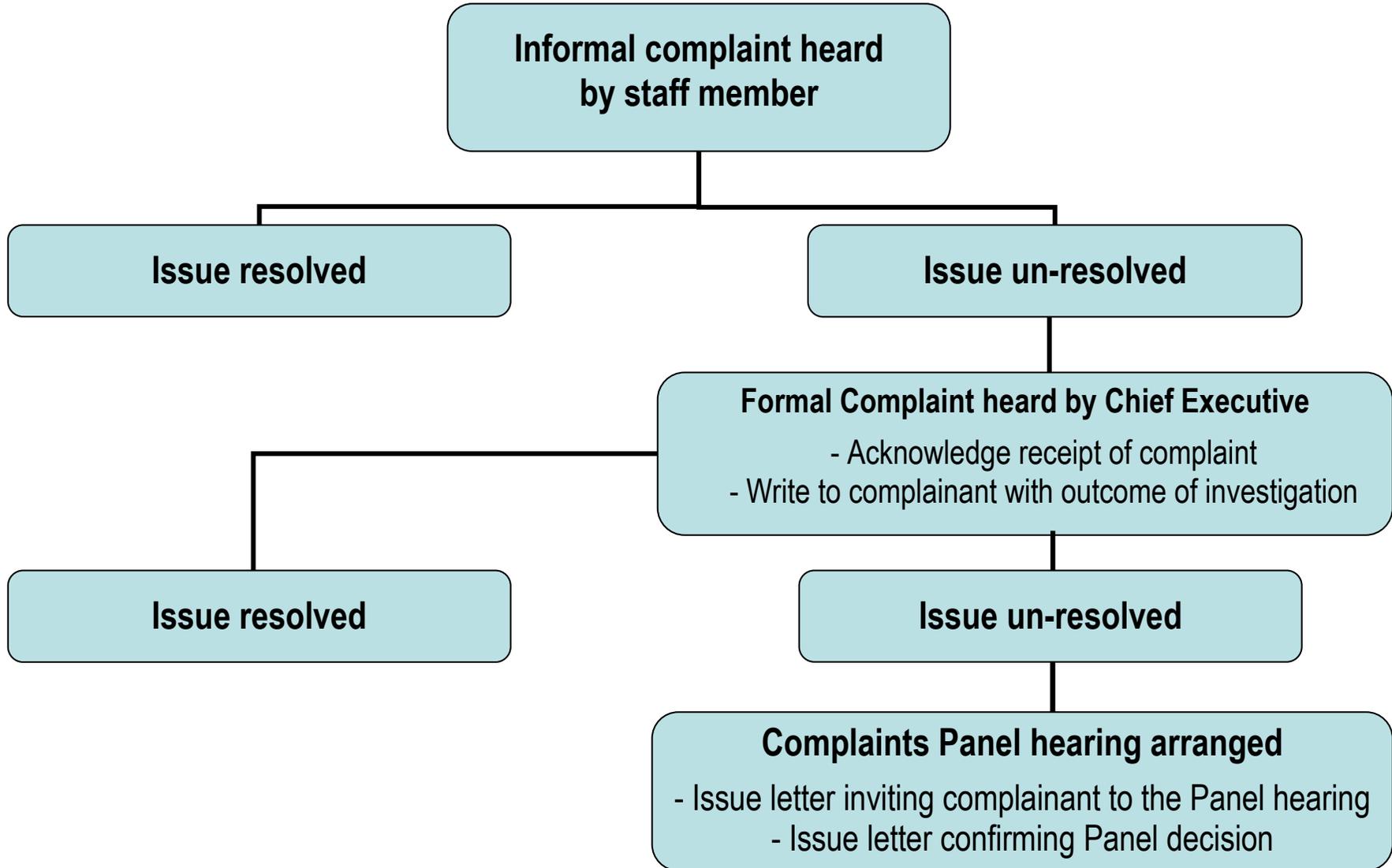
The Role of the Complainant's Accompanier

Should the complainant wish to be accompanied, the role of the person accompanying is to support the person in the Complaints Panel hearing not to represent them. This means that they will usually only talk to the complainant

and will not address the Complaints Panel. In exceptional cases the complainant may put forward a representative, but this would be at the discretion of the Complaints Panel who must be asked in writing at least 5 working days before the hearing. The Trust would not normally permit legal representation at the hearing.

APPENDIX 3

SUMMARY OF DEALING WITH COMPLAINTS



APPENDIX 4
COMPLAINT FORM



Please complete all sections and return to the Complaints Co-ordinator at the appropriate Academy who will acknowledge receipt and explain the complaints process:

SOUTHMOOR ACADEMY: Sara Barwick – sara.barwick@southmoormat.co.uk

SANDHILL VIEW ACADEMY: Joanne Woods - woods.j@sandhillview.com

Your Name:

Pupil Name:

Your relationship to the pupil (if relevant):

Address:

Telephone number (day):

Telephone number (evening):

Please give brief details of your complaint:

What action, if any, have you already taken to try to resolve your complaint? (Who did you speak to and what was their response?):

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

Are you attaching any paperwork? If so, please give details:

Signature **(Complainant)**

Date

APPENDIX 5

POLICY ON UNACCEPTABLE BEHAVIOUR

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

The Board of Trustees 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 Board of Trustees does not expect the Trust's staff to tolerate behaviour by complainants which is unacceptable, for example, which is abusive, offensive or threatening, and it will take action to protect staff from that behaviour. This applies to unacceptable behaviour on any part of the premises of the academies within the Trust, including the yard.

If the Chief Executive Officer 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 Executive Officer will take action to restrict the complainant's contact with the Trust.

Unacceptable actions and behaviours

These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which the Trust often finds 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 pupils;
- behaviour that staff consider to be harassing and intimidating, including in person, over the telephone, or any other type of communication;
- undermining Trust policies by actively encouraging pupils 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; and/or
- combinations of some or all of these.

The decision to restrict access to schools within the Trust will be taken by the Chief Executive Officer. Any restrictions imposed will be appropriate and proportionate. The following options for restrictions may be considered:

- requesting contact in a particular form (for example, letters only);
- requiring contact to take place with a named member of staff or email address;
- 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 Board of Trustees will seek to limit any detriment to any pupils who attend the Trust, 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 Trust 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 prior warning of that action.

APPENDIX 6

POLICY ON UNREASONABLY PERSISTENT COMPLAINANTS

The Board of Trustees recognises that it is the last resort for complainants. It is also accountable for the proper use of public money and must ensure that that money is spent wisely and achieves value for complainants and the wider public.

The Board of Trustees 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 Trust.

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

Actions and behaviours of unreasonable and unreasonably persistent complainants

These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which the schools within the Trust 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 Trust'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 taken into account and commented on, or raising large numbers of detailed questions which are particularly time 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;
- adopting a 'scattergun' approach: pursuing a complaint or complaints with the Trust 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;
- making unnecessarily excessive demands on the time and resources of staff whilst a complaint is being looked into, 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; and

- combinations of some or all of these.

The decision to restrict access to the academy will be taken by the Chief Executive Officer and will normally follow a prior warning to the complainant. Any restrictions imposed will be appropriate and proportionate. The following options for restrictions may be considered:

- requesting contact in a particular form (for example, letters only);
- requiring contact to take place with a named member of staff or email address;
- 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 the Trust 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 their merits.