

Jordan Road Government Primary School

Complaint Handling Mechanism

I. Objectives

1. Building a culture of communication- we encourage parents, students and staff to make good use of various communication channels to express their views and feelings, so as to build up mutual trust and confidence and avoid any unnecessary misunderstanding.
2. Handling complaints in a positive manner – we adopt an open attitude to diverging views, and review our existing policies, procedures and measures for the continuous improvement of our administration.
3. Enhancing effectiveness of governance – we formulate a sound complaint management system, compliant with “Guidelines for Handling School Complaints” of EDB (May 2018) , to effectively handle public complaints, with a view to enhance school governance and credibility.

II. Guiding Principles

1. We handle complaints of different nature about daily operation and internal affairs or complaints related to other legislations in accordance with the relevant EDB circulars and internal circulars, guidelines and codes of practice as appropriate.
2. We established a school-based mechanism with these features, to ensure that public enquiries/complaints are properly handled:
 - ✧ Clear and unambiguous
 - ✧ Open and transparent
 - ✧ Concise and easy to follow
 - ✧ Fair and just
 - ✧ Able to protect the confidentiality of information
 - ✧ Under continuous review and improvement

III. Scope of Application

1. Complaints about the daily operation and internal affairs of the School
2. Complaints about the Education Ordinance, education policies and services directly provided by the EDB
3. This Mechanism is not applicable to the handling of the following types of complaints:
 - 3.1 Complaints related to ongoing legal proceedings;
 - 3.2 Complaints under the jurisdiction of other organisations/government departments; or
 - 3.3 Complaints governed by other ordinances or statutory regulations such as complaints against corruption, fraud or theft.

4. In general, the school may consider not to accept the following types of complaints:
 - 4.1 Anonymous complaints
 - 4.1.1 Whether the complaint is made in written form or in person, the complainant should be asked to provide his/her name, correspondence/e-mail address and/or contact phone number to facilitate investigation and reply. If in doubt, the school may request the complainant to show his/her identity documents. Should the complainant fail or refuse to provide such personal details, thus rendering it impossible for the school to investigate and reply to the complainant, the school may deem the complaint anonymous and consider not to handle it.
 - 4.1.2 However, under special circumstances (e.g. when there is sufficient evidence or when the case is serious or urgent), the middle or senior management of the school may decide whether to follow up with an anonymous complaint, or treat it as an internal reference and inform the subject of the complaint about the case to take appropriate remedial and improvement measures. If follow-up actions are considered unnecessary, the school should briefly state the reasons and put them on file for record.
 - 4.2 Complaints not made by the person concerned
 - 4.2.1 Generally speaking, the person concerned should lodge the complaint by himself/herself. Anyone who seeks to file a complaint on behalf of the person concerned has to obtain his/her prior written consent. If the case involves a student (or a minor, or an intellectually disabled person), then his/her parents/guardian, or the person authorised by the parents/guardian, may lodge a complaint on his/her behalf.
 - 4.2.2 If a complaint is lodged by more than one person on behalf of the person concerned, the school may require the person concerned to appoint one of the complainants as the contact person.
 - 4.2.3 Sometimes a complaint is referred or lodged on behalf of the person concerned by other organisations/groups such as Legislative councillors, district councillors, trade unions or the media. If the relevant organisation/group has obtained prior written authorisation from the person concerned, the School should handle the complaint in accordance with their prescribed procedures.
 - 4.3 Complaints with insufficient information
 - 4.3.1 If the complainant has not provided sufficient information and/or failed to provide further information as requested by the school to enable a proper or meaningful investigation, the school may consider not to conduct investigation and close the case. However, to avoid misunderstanding, the school should provide a written reply to the complainant explaining clearly why the case was not handled by the school.
5. Parents and the public should lodge a complaint within one calendar year from the occurrence of the incident concerned. If the incident concerned happened more than one year ago, the environment might have changed, evidence might have disappeared, or the complainant/subject of the complaint might have already left his/her post or the

school. The school will not be able to investigate the complaint because of the difficulty in collecting evidence.

6. If a complaint involves allegations about a teacher's professional misconduct or misbehaviour, the school will consider the nature and severity of the incident, and carry out appropriate actions, or re-direct it to the relevant division(s)/section(s) of the EDB as soon as possible for acknowledging receipt and direct handling even though the case may have taken place in the school.
7. The school shall seriously consider taking disciplinary /follow-up actions against the staff member(s) involved (including teacher(s)) if the complaint is substantiated, such as strengthening performance management, implementing improvement measures, issuing verbal/written warning, withholding annual salary increment, suspension of duties or termination of employment. The school shall ensure relevant disciplinary /follow-up actions comply with the requirements of the Employment Ordinance, Education Ordinance, Education Regulations, School Administration Guide, relevant EDB Circulars and Civil Service Regulations, etc.

IV. Guiding Principles for Handling Complaints

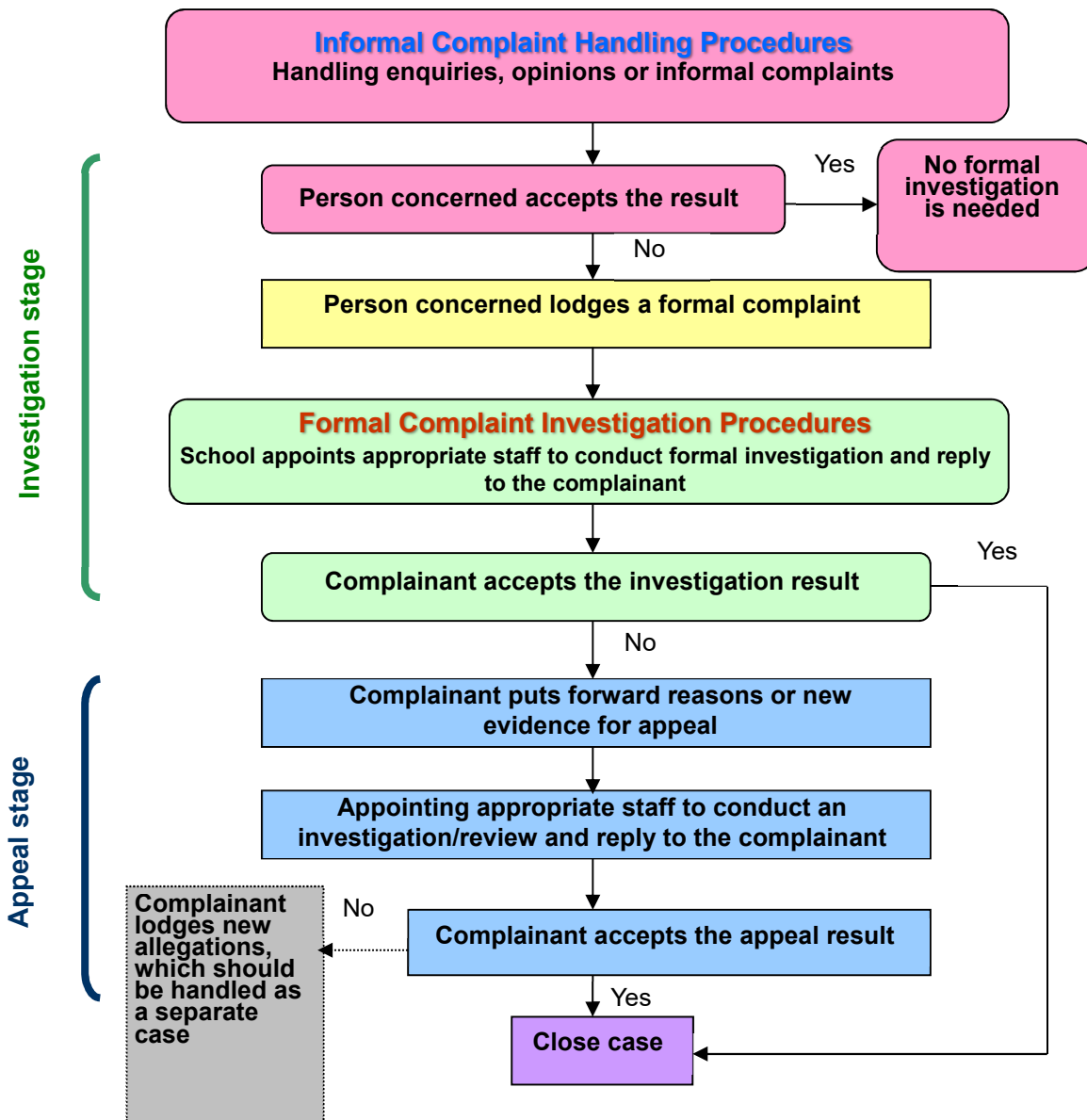
1. Handling of complaints by the appropriate party/parties
 - 1.1 The school will handle complaints relating to its daily operation and internal affairs. When handling these complaints, the school will refer to applicable circulars, directives & codes of practices.
 - 1.2 Relevant division(s)/section(s) of the EDB should handle complaints concerning the Education Ordinance, education policies and services. The EDB may conduct direct investigation of any complaints under special circumstances, e.g. suspected breaches of the Education Ordinance or Education Regulations, non-compliance with the requirements stipulated in the relevant circulars, guidelines and codes of practice, student safety being endangered, school operation being seriously impeded, or serious mismanagement by the school.
 - 1.3 Complaints related to suspected breaches of other legislations of Hong Kong should be lodged to and handled by the relevant law enforcement agencies (e.g. the ICAC, Hong Kong Police Force)
 - 1.4 If a complaint involves both the school and other division(s)/section(s) of the EDB, the related division(s)/section(s) should collaborate with the school(s) concerned on how to follow-up/handle the case.
 - 1.5 If a complaint is lodged to the school and the EDB at the same time, the Bureau will judge, according to the nature and gravity of the issue, whether the complaint should be referred to the school concerned for follow-up or directly handled by the respective School Development Officer(s) of REO.
2. Timely and efficient handling
3. Clear and transparent mechanism
 - 3.1 The school will, in collaboration with their SMCs, set up a clear and effective school-based mechanism for speedy and proper handling of enquiries and complaints. The

School will adequately communicate with teachers and parents to ensure that the relevant procedures are generally accepted by stakeholders.

- 3.2 The School will also regularly review their complaint handling policies and guidelines by adequately communicating with its staff and parents, and revise the handling procedures whenever necessary.
4. Fair and impartial handling
 - 4.1 The School will approach complaints positively and treat the complainants and the subjects of the complaints fairly. The School should provide sufficient appeal channels within the school and consider inviting independent persons to participate in the complaint/appeal handling process, if necessary.
 - 4.2 Before an investigation begins or where appropriate, the designated staff and related individuals should declare interests. If there is any conflict of interest, the persons concerned should avoid handling the case or having access to information relating to it.
 - 4.3 To avoid conflict of interest, any staff member who is the subject of the complaint should not be involved in conducting or supervising the investigation, or signing and issuing letters to the complainant.
 - 4.4 The rights of the complainants or other persons involved in the complaint should be protected and their future communication and contact with the school should not be affected.

V. Procedures for Handling Complaints

Diagram 1: Flowchart of School Complaint Handling Procedures in the School



1. Informal Complaint Handling Procedures

1.1 Immediate / prompt handling

1.1.1 If the school receives an enquiry, opinion or informal complaint from the public, whether verbal or written, and if the case does not require an investigation involving evidence collection, or the person concerned does not request a formal written reply, the frontline staff may handle the matter according to the informal complaint handling procedures of the school.

1.1.2 Frontline staff should listen to the concerns of the enquirer/complainant with care and understanding. If the incident is not serious, they should provide assistance

or information as required or promptly respond to the concerns raised by the enquirer/complainant and help resolve the matters concerned.

- 1.1.3 The time limit for an initial response is two days. If necessary, frontline staff should refer the case to a designated staff or a senior officer for prompt follow-up action and resolution. The school head may decide whether to take up the handling of the case, depending on the situation of the school and the nature of the case.

1.2 Replying to complaints

- 1.2.1 For verbal enquiries/opinions/complaints which are handled in accordance with the informal complaint handling procedures, oral replies will suffice and written replies are normally not required. For opinions/complaints which are presented in written form, or if the school wishes to make clear its stance or provide necessary details, the responsible staff may decide whether a simple written reply to the person(s) concerned/ complainant is appropriate.

1.3 Complaint records

- 1.3.1 Cases handled in accordance with the informal complaint handling procedures normally need not be documented in formal written records. If an enquiry/complaint has been answered or resolved instantly, the designated staff or the school head may record the key points in a log book for future reference.

1.4 Appropriate follow-up

- 1.4.1 The school will review whether the policies and procedures regarding complaints have been properly followed and will suggest appropriate measures to improve the handling of similar cases or prevent their recurrence. If necessary, the staff-in-charge may brief the complainant(s) on the follow-up actions that the school has adopted and the results that follow.

2. Formal Complaint Investigation Procedures

2.1 If the school has made its best efforts to resolve the problem through the informal complaint handling procedures but the complainant does not accept the school's response or the problem remains unresolved, the following formal complaint investigation procedures (including an appeal mechanism) should be initiated:

2.2 Investigation stage

2.2.1 Assign appropriate staff to investigate the complaint and reply to the complainant;

2.2.2 Acknowledge receipt of the complaint within 10 days, seek the complainant's consent to obtain his/her personal data and information relating to the complaint, and inform him/her of the name, post title and phone number of the staff responsible for handling the case for contact purposes.

2.2.3 If necessary, contact the complainant and other persons involved or arrange meetings with them in order to have a better grasp of the situation or request them to provide relevant information,

2.2.4 Handle the complaint as quickly as possible. (The School should complete their investigation within 30 calendar days of receiving the complaint and send a written reply to inform the complainant of the investigation result. For complicated cases which require a longer processing time, an interim reply should be issued to inform the complainant of the progress of the case and the reasons why a longer time is needed to provide a substantive reply and, if possible, the estimated time frame for issuing a substantive reply);

2.2.5 If the complainant accepts the investigation result, conclude the case officially.

2.2.6 If the complainant does not accept the investigation result or the way the school handled the complaint, and is able to provide new evidence or sufficient justification, he/she may lodge an appeal in writing against the school's decision within 14 days from the date of reply from the school.

2.3 Appeal stage

2.3.1 Assign appropriate staff member(s) of a higher rank than those responsible for the investigation stage, or staff member(s) from a different section, to handle the appeal and reply to the complainant,

2.3.2 Handle and resolve the appeal as quickly as possible (The School should complete their investigation within 30 calendar days of receiving the request for appeal), and send a written reply to inform the complainant of the appeal result;

2.3.3 If the complainant accepts the appeal result, conclude the case officially;

2.3.4 If the complainant does not accept the appeal result or the way the school handled the appeal, the school should cautiously review the appeal process to ensure that proper procedures have been followed

2.3.5 If the complainant raises other/ new allegations, the school should handle them separately in order to avoid a mix-up of the previous complaints with new ones.

2.4 Resolving conflict through mediation

- 2.4.1 When handling complaints, the School may, having regard to the nature of individual cases, consider whether it is appropriate to adopt different means to resolve conflicts quickly. This includes seeking mediation service from a mediator, or inviting independent persons/professionals to provide impartial views to assist the persons concerned (including the complainants and the persons/organisations being complained against).
- 2.5 Responding to complaints/appeals
- 2.5.1 If the complaint or appeal is in written form, the School will respond with a written reply. If the complaint or appeal is made verbally, the responsible staff may decide whether to respond orally or in writing.
- 2.5.2 Generally speaking, the time frame for replying to a complaint/appeal begins from the date on which it is received or when the complainant agrees to let the school have access to his/her personal data. If the information submitted is incomplete, the time frame begins from the date on which the school receives the necessary information from the complainant. If a reply cannot be given within the specified period, interim replies will be issued to the complainant explaining why a longer handling time is needed to provide a substantive reply and, if possible, the estimated time frame for issuing a substantive reply.
- 2.6 Complaint/appeal records
- 2.6.1 The School will keep a clear record of cases handled by the formal complaint investigation procedures, and store relevant information (including correspondences, investigation reports and interview records) in a complaint record management system.
- 2.6.2 The Deputy Head of the School will maintain statistics of complaints and appeals addressed through either the informal or formal handling procedures at the end of a school term for future reference.
- 2.7 Appropriate follow-up
- 2.7.1 At the end of the investigation/appeal stage, the School will review whether the policies and procedures regarding complaints have been properly followed, and will suggest appropriate measures to improve the handling of similar cases or prevent their recurrence. If necessary, the staff in charge may brief the person(s) concerned on the follow-up actions that the school has adopted and the results that follow.

VI. Arrangements for Handling Complaints

1. Designated staff

- 1.1 Staff members who are responsible for the appeal stage should be different from those responsible for the investigation stage. In principle, staff dealing with the appeal should be of a higher rank than those responsible for the investigation. If this is not practicable, the school should make other arrangements, such as appointing staff from another department, to ensure fair handling.
- 1.2 Where necessary, the School may establish a task force to handle special complaint cases. Depending on the situation, the task force may include members of the SMC

and representatives from other division(s)/section(s) of the EDB. To enhance credibility, the school may invite independent persons such as social workers, lawyers, psychologists, and parents or teachers not involved in the case to join the task force to provide professional advice and support.

- 1.3 The appointed staff should be proactive in communicating with the enquirers/complainants, and prompt in providing responses as well as the information needed. The School will also ensure that frontline/ designated staff have proper authorisation and that they clearly understand their roles and responsibilities.
- 1.4 The School may refer to the table below for deployment of staff in handling complaints:

Targets involved	Example	Investigation stage	Appeal stage
Teaching and school staff	1	Senior teacher	Deputy Head
	2	Deputy Head	School Head
	3	School Head	Designated staff of the EDB #
Remarks: If the School receives formal complaints against the School head or SMC, they should refer the complaint to REO for follow-up actions.			

Designated staff of the EDB could be the relevant School Development Officer(s) from REO. REO staff would handle the complaints according to the established procedures and route the investigation reports through the SMC Chairperson for information/comment.

2. Confidentiality

- 2.1 All contents and information regarding complaints will be kept strictly confidential and restricted to internal reference or reference by relevant persons only.
- 2.2 If the School needs to collect personal data during the handling process or when they receive requests for the disclosure of data/records in respect of the complaint case, the School should observe the regulations and recommendations laid down in the Personal Data (Privacy) Ordinance. These include clearly stating the purpose and the form of collection of personal data, and that the data will only be used for handling the complaint or appeal cases.
- 2.3 To protect personal data and privacy, the data will be kept in cabinets under lock and key. Computer data should be protected by passwords. Use of portable data storage devices should be tightly controlled. Where necessary, encrypted portable data storage devices should be used. Complaints should normally be graded as "Restricted".

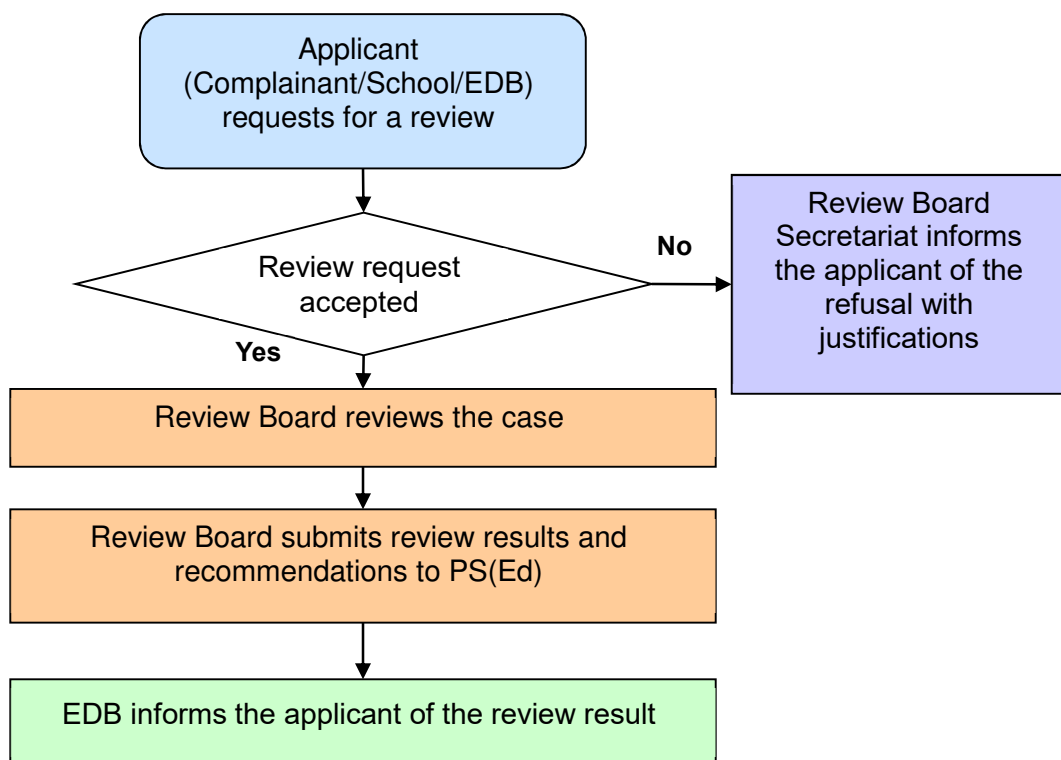
- 2.4 Relevant documents should be marked as “Restricted”. The envelope should be sealed during transit, and the handling staff should sign on the flap of the envelope across the tape. Only authorized persons are allowed access to information relating to the case. The responsible persons should not disclose or discuss in public any contents or information relating to the case without authorization.
- 2.5 Where interviews or meetings with complainant(s) are involved in handling the complaint cases, the responsible staff should:
 - 2.5.1 state clearly whether the person(s) concerned can be accompanied by others (e.g. relatives, legal representatives) during the interview/meeting and reiterate this stance before the interview/meeting starts;
 - 2.5.2 indicate before the interview/meeting starts whether audio/video recording is prohibited or whether the consent of all attendees has been obtained if the session is to be audio/video recorded. This stance should be reiterated by the end of the interview/meeting;
 - 2.5.3 well brief other involved staff members beforehand and ask the staff to remind the complainant(s) before the interview/meeting starts that both the staff and the complainant(s) should be cautious of any unauthorised release of third party information. They should also observe and comply with the six principles stipulated in Schedule 1 “Data Protection Principles” appended to Personal Data (Privacy) Ordinance.
3. Follow-up and evaluation
 - 3.1 The School should conduct a comprehensive review on the strategies, process and steps they have taken in handling complaints in order to improve the handling of similar cases or prevent their recurrence.
 - 3.2 The School will take appropriate follow-up measures to improve their services or revise relevant policies for enhancement of professional standards of their services.
 - 3.3 The School will regularly review their own complaint handling policies and report to the SMCs by providing, for example, relevant data concerning complaint/appeal cases, and suggest, if necessary, improvement measures to enhance their school-based mechanisms.
4. Support and training
 - 4.1 The School will provide appropriate training to assist staff to effectively handle enquiries/complaints, e.g. providing training programmes on communication, negotiation and mediation skills, or arranging experience sharing sessions for frontline/designated staff to enhance their capability in handling complaints and resolving conflicts.
 - 4.2 The school encourages staff to attend courses related to prevention and handling of complaints, from EDB’s Training Calendar System and CSB’s Civil Service College.

VII. Review of Complaints

1. The complainants, the school or EDB may request the “Review Board on School Complaints” (Review Board) to review the complaint cases under the following circumstances:
 - 1.1 The complainant provides substantial grounds or new evidence to show that the school and/or EDB have handled the case improperly; or
 - 1.2 The complaint has been properly dealt with through established procedures by the school, but the complainant refuses to accept the investigation result and continues to lodge the same complaint.
2. Membership of the Review Board
 - 2.1 The EDB has set up a Panel of Review Boards on School Complaints (the Panel). Its members are independent persons from the education and other sectors appointed by the Permanent Secretary for Education (PS(Ed)). The Panel comprises a Chairperson, a Deputy Chairperson and not less than ten members.
 - 2.2 Where necessary, the Panel may set up several Review Boards to review different complaint cases. Each Review Board is composed of the following members: (i) The Chairperson/Deputy Chairperson of the Panel; and (ii) two other members appointed by rotation from the Panel.
 - 2.3 If necessary, the Review Board may invite up to two non-members (such as school staff, representatives of the EDB or professionals) to sit on the board to provide information and/or advices on the case.
 - 2.4 Members of the Review Board should declare their interests. Persons who have any conflict of interest with the organisations and/or persons relating to the case under review are obliged to refrain from participating in the review.
3. Functions and powers of the Review Board
 - 3.1 The Review Board is responsible for reviewing school-related complaint cases that have been gone through the investigation and appeal stages of the School-based Mechanism. The review results and recommendations will be submitted to the PS(Ed) for consideration after the completion of the review by the Review Board.

4. Review procedures

Diagram 2: Review Procedures



- 4.1 The school will inform the complainants in its reply after the appeal that if the complainants do not accept the results of the appeal or the ways the appeal has been handled, the complainants may apply in writing to the Review Board Secretariat in the EDB for a review within 14 days from the dates of the School' replies. When requesting a review, the complainant should state explicitly in the application the reasons for his/her discontent (e.g. the case has not been handled according to proper procedures or the investigation result is prejudiced) and provide substantial justifications or new evidence. The Review Board Secretariat will then forward the case to the Panel to decide whether a review should be conducted.
- 4.1.1 If the review request is accepted, the Panel will set up a Review Board to handle it. If the request is unsuccessful, the Review Board Secretariat will inform the applicant (complainant/school/EDB) in writing of the reasons for refusal.
- 4.1.2 The person who requests for a review is required to sign a letter of consent, authorising the Review Board to forward information regarding the complaint to the school/school sponsoring body and/or other relevant organisation(s)/person(s). The Review Board also has the right to obtain information related to the complaint/review from the complainant, the school/school sponsoring body and/or other relevant organisation(s)/ person(s).
- 4.1.3 The review process mainly involves examination of investigation reports and related documents. Taking into account the subject matter and nature of the case, the Review Board may:

- (a) scrutinise the information provided by the complainant, subject of the complaint, school/school sponsoring body and/or EDB, as well as the files and records associated with the case;
- (b) require the complainant, subject of the complaint, school/school sponsoring body and/or EDB to clarify information and/or provide new evidence;
- (c) meet with the complainant, the subject of the complaint and/or other persons concerned respectively to collect further information; or
- (d) invite the complainant, subject of the complaint, representative(s) of the school/school sponsoring body, and/or representative(s) of EDB to attend case meetings.

4.1.4 To protect personal privacy, the Review Board/EDB may not disclose to anyone any personal information related to the complaint without the consent of the relevant parties (including the complainant, subject of the complaint, and/or the school/school sponsoring body).

4.1.5 If the Review Board wishes to interview specific persons or convene a meeting on the case, it will make the following arrangements:

- (a) The persons to be present at the interview or case meeting must be involved in the complaint and have obtained the approval of attendance from the Chairperson of the Review Board;
- (b) During the interview or case meeting, the complainant is not allowed to question the subject of the complaint or other witnesses, and vice versa; and
- (c) Audio/video recording is prohibited during the interview or case meeting.

5. Result of review

5.1.1 The Review Board will examine whether the case has been handled properly according to the complaint handling procedures and whether the result of investigation by relevant party is fair and reasonable. It will then make recommendations on whether to close the case, settle the disputes through mediation, implement follow-up/remedial measures, or conduct a re-investigation. The review results and recommendations will be submitted to the PS(Ed) for consideration.

5.1.2 The EDB will draw a final conclusion with reference to the review result and recommendations of the Review Board. The applicant(s) will be informed in writing of the outcome within three months after receipt of the request for review. If the EDB accepts closure of the case as recommended by the Review Board, the EDB and the school will cease to handle the complaint. If the applicant(s) requesting the review considers the result unacceptable, they may further appeal via other channels.

5.1.3 If the Review Board recommends that the case be re-investigated by the school/EDB, the school/EDB should assign staff members who are at least one rank higher than those who handled the case previously to conduct the re-investigation. The re-investigation should be completed within two months and the result submitted in writing to the Review Board. Upon the endorsement of the

Review Board, the school/EDB would issue a written reply to the complainant and copy it to the Review Board. If the school/EDB cannot complete the investigation within two months, it should notify the complainant in writing of the reasons and the time needed for a definite reply.

VIII. Handling of Unreasonable Behaviour

1. Appropriate communication and mediation are conducive to removing misunderstanding and enhancing mutual trust. Under general circumstances, the School will not put any restrictions on complainants making contact with the school. However, sometimes certain unreasonable behaviour of complainants may have a severe negative impact on the School, e.g. draining a considerable amount of the school's human resources, interrupting their operations or services, as well as threatening the safety of staff and other stakeholders. We have therefore set up appropriate policies and measures to handle this kind of unreasonable behaviour to ensure that the school's operation would not be affected.

2. Definition of unreasonable behaviour

2.1 Unreasonable behavior by complainants can generally be classified into the following three types:

2.1.1 Unreasonable attitude or behaviour, such as:

- (a) Acts of violence or intimidation
- (b) Making complaints with abusive language or in an insulting and discriminatory tone
- (c) Providing false data or deliberately concealing facts

2.1.2 Unreasonable demands include:

- (a) Requesting a huge amount of information or demanding special treatment
- (b) Making telephone calls incessantly to ask for a dialogue or an interview, or to command a certain staff member to reply
- (c) Commanding a certain staff member to meet at a specific time and place

2.1.3 Unreasonable persistent complaints include:

- (a) Insisting on rejecting the explanations and findings of the school/EDB, and/or requiring the school/EDB to discipline certain person(s), even after appropriate investigation procedures have been taken
- (b) In respect of the same case, repeatedly making the same complaints or presenting similar justifications as before without providing any new evidence
- (c) In respect of the same case, persistently bringing in new allegations or new complaint targets, but failing to present concrete evidence
- (d) Interpreting things in an unreasonable or irrational manner, or wrangling over trivial details

3. Handling of unreasonable behaviours

3.1 The School Head is designated to ascertain whether a complainant's behaviour is reasonable, and decide what measures should be taken. However, if the complaint is

lodged against the School Head, such decisions should be made by the designated staff member of the REO.

3.1.1 Unreasonable attitude or behaviour

- (a) Any unreasonable attitude or behaviour, including acts of violence, intimidation, and abusive/offensive conduct or language, whether performed face-to-face, by phone, or in writing are unacceptable. The staff member handling the complaint should convey this message clearly to the complainant and demand that the complainant stops acting in such a way, and inform them that the meeting or conversation may otherwise be terminated. If the complainant refuses to comply after the warning, the staff member may terminate the meeting or conversation with the complainant.
- (b) School staff can make a decision, depending on the situation, on whether to terminate the interview or dialogue with the complainant and ask the complainant to leave, if his/her behaviour poses an immediate threat to the staff's personal safety or damages their personal interests. In an emergency or if it is deemed necessary, the school should take appropriate and decisive actions, such as reporting to the police or taking legal action.

3.1.2 Unreasonable demands

- (a) If a complainant makes unreasonable demands which have an adverse impact on the school, e.g. interrupting its operation/services or other stakeholders are affected by the unreasonable behaviour of the complainant, the school may consider suggesting to the complainant alternative communication methods (e.g. make appointment before visiting the school, submit his/her views in writing or contact the designated staff according to the school's arrangement, etc.). The school will notify the complainant in writing of such arrangements and handling procedures.
- (b) If the complainant's behaviour improves, the school may consider whether the restrictions should be lifted. If the school decides to keep the restrictions, it should regularly review the conditions for imposing them.

3.1.3 Unreasonable persistent complaints

- (a) Faced with these complaints, if the school has carefully examined the case and handled it properly under the prescribed investigation and appeal procedures, and sent a detailed and unbiased written explanation regarding the outcome to the complainant, the case should be escalated to a more senior officer holding a post not lower than Directorate Pay Scale Point 2 for a decision on whether any further correspondence or actions on the complaint should be discontinued.
- (b) To avoid any unrealistic expectations on the part of the complainant, the school should communicate to him/her in a firm manner that a final decision has been made regarding the case and that the decision is irreversible.
- (c) In response to these complaints, the school may send a "Reply Card" to the complainant, referring him/her to the replies previously given.