

Reviewed: December 2018
Review period: bi-annual

Bacup and Rawtenstall Grammar School



Single Equality Policy

At Bacup & Rawtenstall Grammar School (BRGS) we believe equality means treating everyone with equal dignity and worth, valuing their characteristics such as their age, disability, gender, ethnicity, religion or belief, sexual orientation and socio-economic circumstances.

We will work with all our partners, staff, students, parents/carers to challenge discriminatory barriers which limit what people can do and can be.

If your preferred language is not English, or for those who are blind or partially sighted, please contact us on enquiries@brgs.org.uk to make arrangements to help you with this document.

1.1 Introduction.

There were a number of statutory duties that the school was required to meet prior to the Equality Act 2010. As such, with the implementation of this act and the harmonisation of previous legislation, this policy will refer to the Equality Act 2010 and its various provisions as the legislative framework through which this Single Equality Policy will operate.

In the development of this Single Equality Policy Bacup and Rawtenstall Grammar School (BRGS) has moved from a focus on an individual response to an approach that builds on **disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation and age** considerations from the start and at every level of the school, at strategic, policy, management and classroom level. These are defined as the **protected characteristics**.

The **protected characteristic “marriage and civil partnership”** is not included within this policy as it is primarily concerned with school’s obligations to it’s students. However, it is our stated intention to regard this characteristic with the same respect as the others, and we will seek to maintain equity in relationship to it.

We will ensure that every student, irrespective of the **protected characteristics**, is able to achieve high standards and that strategies are in place to tackle under-achievement. We will ensure that every student has access to the necessary support required to enable them to achieve their highest potential. We will ensure that the school’s procedures for disciplining students and managing behaviour are fair, effective and equitable.

Our intention is to ensure that the adults working in the school include as much as possible a balanced representation of the local and wider community. We believe that this will provide good role models for students from all backgrounds.

We will comply with the Public Sector Equality Duty (PSED), which establishes in section 149 of the Equality Act 2010, that public authorities are required to pay due regard to the need to:

- Eliminate all forms of discrimination, harassment and victimisation that are prohibited by the Equality Act; and
- Advance equality of opportunity; and
- Foster good relations between people who share a **protected characteristic** and those who do not.

1.2 Local Context.

BRGS is situated in the town of Waterfoot in the Rossendale Valley, Lancashire.

Rossendale has a vibrant and diverse community base. It has a population of 68,000 (2011 census) with roughly equal numbers of males and females. 93.4% of the valley’s population were born in England and

97.4% speak English. 63.8% describe themselves as Christian, 24.6% having no religion and 3.8% muslim. Other religions (including Jedi Knight) are claimed in decreasing proportion.

1.3 School Context.

Bacup and Rawtenstall Grammar School is a larger than average, selective, co-educational grammar school that converted to academy status in October 2012. The proportion of disadvantaged pupils eligible for support through the pupil premium (additional funding provided to support the education of pupils known to be eligible for free school meals and children who are looked after) is considerably lower than the national average. The proportion of pupils from minority ethnic groups and those who speak English as an additional language is lower than the national average, as is the proportion of disabled pupils and those with special educational needs.

Ofsted 2016

2.0 Specific Equality Areas (the protected characteristics).

Disability

We recognise that a person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Gender

We recognise that a person's gender refers to the fact that they are male or female. In relation to a group of people, it refers to either men or women or to boys or girls.

Gender Reassignment

We recognise that a person may express their gender in a way that differs from or is inconsistent with the physical gender that they were born with.

Pregnancy and Maternity

Relating to a woman (or a female student of any age) less favourably because she is or has been pregnant, has given birth in the last 26 weeks or is breastfeeding a baby who is 26 weeks or younger.

Race

The school adopts the definition of Race as outlined in the Equality Act 2010 as one of the **protected characteristics** which refer to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

Religion or Belief

A Religion or belief refers to a religious and/or philosophical belief including lack of belief (e.g. Atheism). A religion must be identifiable and have a clear structure or belief system. A belief need not include faith or worship of a god or gods, but must affect how a person lives their lives or perceives the world (e.g. Humanism)

Sexual Orientation

The school uses the definition as outlined in legislation as sexual orientation meaning a person's sexual orientation towards:

- persons of the same sex
- persons of the opposite sex, or
- persons of either sex

The school extends the definition of this **protected characteristic** of sexual orientation to include:

- references to a person who is of a particular sexual orientation, or
- references to persons who share the same sexual orientation

Age

Under the school's provisions of the Act, age is excluded from the list of **protected characteristics**. However, we are committed to ensuring that everyone should have equal access to all the services provided by the school and that no-one within our school community experiences age discrimination.

3.0 Our Commitment.

BRGS is committed to promoting an ethos that safeguards the dignity and well being of everyone and encourages practices that take into account the rights of individuals to be treated with dignity and respect. We will not tolerate any form of discrimination, harassment and victimisation directed at anyone related to a **protected characteristic**.

This Single Equality Policy incorporates our commitment and actions regarding the **protected characteristics**. It demonstrates our commitment to addressing them in our decision making and the delivery of education.

We are committed to promoting equality of opportunity for all students, staff and other users of our services so they can have equal access to all our school and its services. This policy is a statement of our commitment.

We will continue to review our policies, practices and procedures so that they do not adversely affect anyone due to a **protected characteristic**. By also building this into our curriculum, working and procurement processes we will expect others to do the same.

- We recognise that stereotypes exist for both **genders** and some can lose opportunities because of these stereotypes and welcome the requirements of the Equality Act 2010 with specific provision for Gender Equality:
 - Eliminating unlawful discrimination and harassment on the grounds of gender, including domestic violence, sexual violence, bullying and exploitation.
 - Promoting equality of opportunity between those of any or no gender in all of our functions.
- We understand **gender reassignment** does not necessarily require a medical process to be undertaken and that a person will be protected because of gender reassignment if they:
 - Make their intention known to someone at the school
 - Start to behave or dress according to the gender they identify with
 - Undergo treatment such as surgery or hormone therapy
 - Have already received gender recognition under the gender recognition act 2004
- The school will also respect the confidentiality of those seeking gender reassignment and will provide a supportive environment within its school community.
- We will seek to make arrangements for female students or staff to ensure that they are not treated less favourably because they are pregnant or breastfeeding. We will not discriminate against students or staff in absences related to **pregnancy and maternity**.
- The school recognises that ethnic minority students and staff may experience discrimination on the basis of **race**, colour, nationality and ethnic origin. This discrimination can manifest itself in all areas of their lives and can have serious consequences in terms of damaging people emotionally and physically and limiting life choices and opportunities.

- The school and governing body does not tolerate any form of race discrimination which it recognises is unacceptable, discriminatory and unlawful, and is proactive in ensuring that people whatever their race, are treated fairly. This commitment is consistent with the significant progress that the school has already made in this area.
- We will comply with the requirements of the Equality Act 2010 with regard to Race Equality.
- Faith-based hate crime has been a new phenomenon in recent years, developing a character that is distinct from race hate crime.
- The school seeks to eliminate all forms of discrimination and prejudice based on **religion** and/or belief or non-belief, either direct or indirect, and is committed to treating staff, students and others fairly, regardless of their religion or belief and will not condone unfavourable treatment on this basis.
- The school will combat discrimination faced by lesbians, gay, bisexual and transsexual (LGBT) people. We want to ensure equality of opportunity for LGBT people across our curriculum provision, services and employment.
- We will respect the rights of individuals to be open about their **sexual orientation**, tackle homophobia, challenge stereotyping and improve knowledge about LGBT communities, both internally and to the community as a whole.
- The school recognises the need to protect students and staff from unlawful discrimination and harassment on grounds of sexual orientation as required by the Equality Act (Sexual Orientation). We are committed to taking a pro-active approach to preventing all forms of homophobia within the school and will continually review the impacts of our policies, functions and procedures on promoting sexual orientation equality.
- We will deal with complaints of discrimination and harassment speedily and according to Local Authority Guidance and notify complainants of the outcome and actions taken.

4.0 Consultation, Information and Actions.

In drawing together this policy we have consulted with:

Staff – a forum of volunteers wishing to contribute; respondents to a review of this policy.

Students – through our student council.

Governors – through our pastoral sub-committee.

Parents – through our parent- teacher association and via an open invitation for all parents to contribute.

4.1 Our Achievements.

The academy is a very safe and purposeful environment where pupils value the autonomy they have to explore and develop as individuals. This has led to them becoming self-disciplined, reflective and independent-minded young people.

The academy's work to promote pupils' personal development and welfare is outstanding.

Attainment is outstanding in all subjects, across all years, for all groups, including disadvantaged pupils, disabled pupils and those with special educational needs. The attainment gap between disadvantaged pupils and their peers is continuing to narrow.

Ofsted 2016

General Principles

- We promote tolerance through our PSHCE curriculum with great effect. To a very large degree, students accept others who are "different". In the same way, our assembly programme and form

time reflections emphasise an individual's right of choice (whatever the context).

Disability

- We have modified classrooms to accommodate students with particular physical conditions. We have purchased additional seating of a specific types.
- We adjust curriculum rooming to enable disabled students study in the most suitable environment.
- We have ensured there is a means of ramp/level access to all major buildings across site.
- Where there are access difficulties (eg parents who are wheelchair users) we have made alternative arrangements for parents' evenings.
- Our new buildings have widened doors to enable wheelchair access.
- We have completed both auditory, vision and physical movement audits across the site.
- Staircases are all marked with white paint or tactile strips.
- We have lift access to all levels of our sixth form centre.
- We provide relevant resources to students with particular physical conditions.

Gender

- We regularly monitor examination performance across gender through Raiseonline and ALPS.
- We set equally rigorous targets for student achievement, regardless of gender.
- We encourage students to study across the full spectrum, and consider a wide range of career options. There is no emphasis towards a particular career path determined by gender.
- Where students request sporting involvement we seek to make it available, regardless of the "gender stereotype" of the sport.
- Issues related to bullying (of any type) and exploitation are dealt with throughout the PSHCE curriculum, but also via the work of heads of year, pastoral manager and through the general message delivered through our assembly programme and form time reflections.
- Our e-safety policy addresses the issues of internet safety and covers issues related to gender and well as other issues.

Gender Reassignment

- We support students who have changed or are changing gender.

Pregnancy/Maternity

- We treat pregnant women and mothers according to established legislation.

Race

- We uphold a school ethos that states that all are equal. This is emphasised within the learning environment within a range of lessons, and very publicly through our assembly programme and form time reflections.
- Issues of racist abuse are always taken seriously, and are dealt with promptly. All are reported to the LA through their required form.
- Examination results are analysed in a way that allows comparisons to be made between students from a range of ethnic backgrounds.

Religion/Belief

- While our assembly programme is broadly Christian, we include opportunities for festival days from a variety of religions to be celebrated.
- Our Religious Studies curriculum allows a range of religions to be understood, while following the specifications set down by external examining bodies.
- We emphasise religious tolerance and have a yearly focus on the Holocaust, led by the History department.
- We follow guidelines that allow parents to remove their children from Religious Studies.

Sexual Orientation

- Our school sees students as people, not as labels attached to a sexual orientation.
- We promote equality amongst students in all areas and encourage self-expressions.

4.2 Actions

General

- We will continue to promote acceptance through our teaching curriculum.

Disability

- We will review our marketing and communications material so that positive images are displayed of individuals – able or disabled. Where images of disabled people are shown, we will ensure that these images are wholly positive.
- We will continue to adapt our curriculum organisation to enable disabled people full access.
- Our assembly programme will give the opportunity for all to contribute, and we will positively promote the achievements of people with disabilities.
- We will regularly review the physical environment and make any necessary modifications to allow for full access.
- We will seek to make all reasonable adjustments to allow equality of access for people with disabilities.
- As an equal opportunities employer we will ensure that disabled employees are given the opportunity to fulfill their roles.
- All students and staff will have the opportunity to involve themselves in the wider life of the school. Where this requires modifications in light of a disability (e.g. trips) we will ensure those modifications are made.

Gender

- We will continue to further emphasise opportunities for students of any gender to follow career paths that have traditionally been considered stereotyped to a specific gender.
- We will act if we detect a gender bias with examination outcomes or within subject selection/careers choices being made by our students.
- We will maintain our intention to employ the highest quality staff regardless of gender (race, sexual orientation and age).

Gender Reassignment

- We will continue to learn how to support students who wish to change gender.
- We will be proactive in managing practical issues – changing rooms, school uniform, etc.

Pregnancy/Maternity

- We will treat pregnant colleagues and those within maternity according to established legislation.
- Where students become pregnant we will provide the opportunity for them to continue with their education according to their considered wishes.
- Where a mother (student, member of staff, visitor) wishes to breast feed we will provide private accommodation for this to take place should they wish it.

Race

- We will maintain a clear record of the ethnic mix within our school.
- All resources will be checked so that they represent an equality of images in terms of racial background.
- We will continue to follow LA procedures regarding racist abuse.
- It is our intention to promote one school population regardless of ethnic background. We will also seek to celebrate the diversity of the ethnic mix within school and encourage dialogue and understanding.

Religion/Belief

- We will keep accurate records of the religion (or not) of students.
- We will continue to follow LA procedures regarding faith/non-faith based abuse.

- It is our intention to promote one school population regardless of faith/non-faith based background. We will also seek to celebrate the diversity of the faith/non-faith based mix within school and encourage dialogue and understanding.
- We will promote the active participation of different religion or belief communities in shaping the future of school. As far as possible we will ensure the school staff, students and their families as well as our partners and the wider community fully understand the principles of tolerance and good religion or belief relations.
- We will continue to celebrate all religions.

Sexual Orientation

- We treat victimization on the basis of sexual orientation in the same way as we would treat racist abuse or abuse based on religious belief.
- Students and staff are free to express their own sexuality within the parameters of a school community.
- Sex and relationship guidance is dealt with within PSHCE.

5.0 Monitoring and Review

We are an inclusive school, working towards greater equality in the whole school community. We use the curriculum and teaching to enhance the self esteem of all those it serves and to provide a learning environment in which each individual is encouraged to fulfil her or his potential.

We collect and analyse a range of equality information for our pupils/students:

- Attendance
- Exclusions
- Racism, disabilism, sexism, homophobia and all forms of bullying

We make regular assessments of students' learning and use this information to track students' progress, as they move through the school. As part of this process, we regularly monitor the performance of different groups, to ensure that all groups of students are making the best possible progress. We use this information to adjust future teaching and learning plans, as necessary.

School performance information is compared to national data and local authority data, to ensure that pupils are making appropriate progress when compared to all schools, and to schools in similar circumstances.

Our monitoring activities enable us to identify any differences in pupil performance and provide specific support as required, including pastoral support. This allows us to take appropriate action to meet the needs of specific groups in order to make necessary improvements.

Due regard is given to the promotion of equality in the School Improvement Plan. The person responsible for the monitoring and evaluation of the policy and action plan is Paul Reeves (deputy headteacher).

Their role is to:

- Lead discussions, organise training, update staff in staff meetings, support discussions
- Work with the governing body on matters relating to equality
- Support evaluation activities that moderate the impact and success of this policy

6.0 Developing Best Practice

Learning and Teaching

Good and outstanding teaching at the academy has resulted in outstanding levels of attainment and progress for all groups of pupils, including those who are disadvantaged, disabled pupils and those who have special educational needs.

Ofsted 2016

We aim to provide all our pupils with the opportunity to succeed, and to reach the highest level of personal achievement. To do this, teaching and learning will:

- Provide equality of access for all pupils and prepare them for life in a diverse society
- Use materials that reflect a range of cultural backgrounds, without stereotyping
- Use materials to promote a positive image of and attitude towards disability and disabled people
- Promote attitudes and values that will challenge discriminatory behaviour
- Provide opportunities for pupils to appreciate their own culture and religions and celebrate the diversity of other cultures
- Use a range of sensitive teaching strategies when teaching about different cultural and religious traditions
- Develop pupils advocacy skills so that they can detect bias, challenge discrimination, leading to justice and equality
- Ensure that the whole curriculum covers issues of equality and diversity
- All subject leaders' departments, where appropriate, promote and celebrate the contribution of different cultures to the subject matter
- Seek to involve all parents in supporting their child's education
- Provide educational visits and extended learning opportunities that involve all pupil groups
- Take account of the performance of all pupils when planning for future learning and setting challenging targets
- Make best use of all available resources to support the learning of all groups of pupils
- Identify resources and training that support staff development

The Learning Environment

There is a consistently high expectation of all pupils regardless of their gender, ethnicity, disability, religion or belief, sexual orientation, age or any other recognised area of discrimination. All pupils are encouraged to improve on their own achievements and not to measure themselves against others. Parents are also encouraged to view their own children's achievements in this light.

- Teacher enthusiasm is a vital factor in achieving a high level of motivation and good results from all pupils
- Adults in the school will provide good, positive role models in their approach to all issues relating to equality of opportunity
- The school should place a very high priority on the provision for special educational needs and disability

- We will meet all pupils' learning needs including the more able by carefully assessed and administered programmes of work
- The school must provide an environment in which all pupils have equal access to all facilities and resources
- All pupils are encouraged to be actively involved in their own learning
- A range of teaching methods are to be used throughout the school to ensure that effective learning takes place at all stages for all pupils
- Consideration will be given to the physical learning environment, both internal and external, including displays and signage

Curriculum

We aim to ensure that:

- Planning reflects our commitment to equality in all subject areas and cross curricular themes promoting positive attitudes to equality and diversity
- Pupils will have opportunities to explore concepts and issues relating to identity and equality
- Steps are taken to ensure that all pupils have access to the mainstream curriculum by taking into account their cultural, backgrounds, linguistic needs and learning styles
- All pupils have access to qualifications which recognise attainment and achievement and promote progression

Resources and Materials

The provision of good quality resources and materials is a high priority. These resources should:

- Reflect the reality of an ethnically, culturally and sexually diverse society
- Reflect a variety of viewpoints
- Show positive images of males and females in society
- Include non-stereotypical images of all groups in a global context
- Be accessible to all members of the school community

Language

We recognise that it is important that all members of the school community use appropriate language which:

- Does not transmit or confirm stereotypes
- Does not offend
- Creates and enhances positive images of particular groups identified at the beginning of this document
- Creates the conditions for all people to develop their self esteem
- Uses accurate language in referring to particular groups or individuals and challenges in instances where this is not the case

We will seek to make appropriate provision for all EAL/bi-lingual children/groups to ensure access to the whole curriculum.

Personal Development and Pastoral Guidance

- Staff take account of gender, ethnicity, disability, religion or belief, sexual orientation, age or any other recognised area of discrimination and the experience and needs of any particular groups such as Gypsy, Roma and Traveller, refugee and asylum seeker pupils
- All pupils are encouraged to consider the full range of career opportunities available to them with no discriminatory boundaries placed on them due to their disability, gender, race or sexual orientation (whilst acknowledging that a disability may impose some practical boundaries to some career aspirations)
- All pupils/staff/parents/carers are given support, as appropriate, when they experience discrimination
- We recognise that perpetrators may also be victims and require support
- Positive role models are used throughout the school to ensure that different groups of pupils can see themselves reflected in the school community
- Emphasis is placed on the value that diversity brings to the school community rather than the challenges.

Staffing and Staff Development

We recognise the need for positive role models and distribution of responsibility among staff.

- This must include pupils' access to a balance of male and female staff at all key stages where possible
- We encourage the career development and aspirations of all school staff
- It is our policy to provide staff with training and development, which will increase awareness of the needs of different groups of pupils
- It is our policy to provide staff with training and development, which enables them to confidently carry out their roles and responsibilities
- Access to opportunities for professional development is monitored on equality grounds

Staff Recruitment

All those involved in recruitment and selection are trained and aware of what they should do to avoid discrimination and ensure good practice through the recruitment and selection process.

- Equalities policies and practices are covered in all staff inductions
- All temporary staff are made aware of policies and practices
- Employment policy and procedures are reviewed regularly to check conformity with legislation and impact

There are also instances in which a job will qualify for a genuine occupational requirement on the grounds of gender. However, only in very few instances would this be permissible, for example, where the job is likely to involve physical contact with members of the opposite sex, where matters of decency or privacy are involved.

7.0 Publishing and Raising Awareness.

Our Single Equality Policy is a public document that should be available to any interested stakeholder.

As such, we will ensure this policy is made available on the school web-site, is placed within the staff area

of the school network and is issued to all new colleagues joining the school.

7.1 Links with other School Policies

School policies that link with, and have informed this Single Equality Policy include:

- Accessibility Plan
- Admissions Policy
- Anti-Bullying Policy
- Behaviour for Learning Policy
- BRGS e-Policy
- Careers in the Curriculum
- Child Protection Policy
- Collective Worship Policy
- Equal Opportunities Policy
- Looked After Child Policy
- Race Equality Policy
- Recruitment Policy
- SEN Policy
- Sex and Relationships Policy
- Whistleblowing Policy

8.0 Roles and responsibilities

This Single Equality Policy outlines the roles and responsibilities of everyone involved and connected with the school, so that each individual knows what is expected of them. Promoting equality and preventing discrimination, victimisation and harassment is the responsibility of the whole school staff, including support staff. All who are associated with the school have a responsibility for promoting equality and community cohesion, and avoiding unfair discriminatory practices.

The Governing body will:

- ensure the school complies with all current equality legislation.
- monitor the implementation of the Single Equality Policy to check progress and assess impact on staff, students and parents
- ensure that governors are aware of their legal responsibilities under equality legislation
- receive and discuss regular equality reports on progress and performance
- monitor achievement of equality targets
- check that implementation of the Policy achieves improved outcomes for equality and people who share an aspect of their identity in relation to the **protected characteristics**.
- support the Head teacher in implementing any actions necessary
- inform and consult with parents about the policy
- have one governor who takes on the role of designated governor responsible for equality monitoring the policy closely.

The Headteacher will:

- provide proactive leadership to create a community that recognises and celebrates difference within a culture of respect and cooperation
- ensure staff, students, parents/carers and any other interested stakeholders are aware of this Single Equality Policy, their roles and responsibilities in implementing it, and receive training and support in carrying these actions out.
- monitor to ensure effective implementation of the Single Equality Policy

- provide regular reports for governors on progress and performance
- allocate appropriate responsibilities, and provide suitable training and development for staff to implement this policy
- assess and monitor the impact of the policy
- make sure the policy is readily available and that the governors, staff, students and their parents know about it
- take appropriate action in any cases of victimisation, harassment and discrimination in line with the school and LA guidance
- report racist incident monitoring information to the LA on a regular basis
- produce a report on progress for governor on an annual basis

The Senior Leadership Team will:

- drive forward implementation of the Single Equality Policy
- support staff to carry out their role in implementing this policy
- provide effective leadership on equality and inclusion
- ensure the Single Equality Policy is successfully promoted
- respond in a timely and appropriate manner when dealing with any incidents or issues of discrimination, victimisation or harassment.
- assist in implementing reviews of the Single Equality Policy

All Staff will:

- promote equality, inclusion and good community relations
- challenge inappropriate language and behaviour
- tackle bias and stereotyping
- respond appropriately to incidents of discrimination, victimisation and harassment and report these
- highlight to the senior leadership team any staff training or development that they require to carry out the above role and responsibilities.
- promote an inclusive curriculum and whole school ethos which reflects our diverse society
- review and monitor curriculum policies and planning in their own subject areas to ensure that equality is promoted

All Staff will also ensure that students are encouraged to:

Recognise that they have a role and responsibility to themselves and others so that they understand and are able to:

- promote equality, inclusion and good community relations
- challenge inappropriate language and behaviour
- tackle bias and stereotyping
- work to promote anti-bullying strategies
- respond appropriately to incidents of discrimination, victimisation and harassment and understand the action needed to report these.

Administrative, Ancillary, Supervisory and Support Staff:

- will familiarise themselves with this Single Equality Policy and know what their responsibilities are in ensuring that it is implemented

All our Students are responsible for:

- treating others kindly and fairly without prejudice, discrimination, victimisation or harassment
- attending and engaging in their own learning as well as helping other students to learn
- learning to treat others with respect and report incidents of discrimination to an adult

All our Parents and Carers are responsible for:

- supporting our school in its implementation of this Single Equality Policy
- following the school policy through their own behaviour
- ensuring their children attend and engage in the learning
- informing staff about any prejudice related incidents that occur

Visitors and contractors are responsible for:

- knowing and following our equality policy

8.1 Breaches of the Policy

Breaches of this Single Equality Policy will be dealt with in the same way that breaches of other school policies are dealt with, as determined by the Headteacher and Governing Body.

If a member of the public feels that they have suffered harassment or been treated unfairly by the school relating to a **protected characteristic** they should report this without fail through the school's complaints procedure.

