### **London Borough of Waltham Forest**

**Standing Advisory Council on Religious Education** 



# **SACRE Annual Report 2018-19**

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Waltham Forest SACRE is a member of the National Association of SACREs

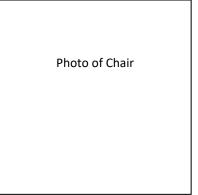




### Introduction from the Chair of SACRE

about 300 words

Yet again this year I wish to start this forward by thanking the efforts of our education directorate to ensure that our SACRE may continue to carry out its functions into the future. The changes enacted by the present Government have reduced the education support budget to the bone for local authorities, and these changes have had a major impact on the support that many SACRE's are provided with. I just wanted to start by thanking our council leader and cabinet lead in conjunction with our educational professionals in continuing to support the work that we do in promoting and supporting community and faith cohesion in our



I hope by now you will have seen that Waltham Forest has been greatly privileged to be declared the first London Borough of Culture for 2019 and this I am sure will bring much to help us all extend the opportunities to explore and appreciate the many gifts and talents that our religions have brought to our cultural mix. Before I get kicked in the shins I must also qualify this by saying we have endeavoured to value and explain the position of people who are either agnostics, atheists, humanists and those without any type of faith

Finally, can I pay tribute to all the SACRE members who come out to our at least six meetings a year, many held on cold and inhospitable winter nights, it's a great pleasure meeting and working with them all. I'd also like to pay thanks to our support, particularly from Governor Services and our SACRE Clerks. I thank Peter Dawe for his long and valued service to our SACRE as he stood down this year as a member and vice chair. We all wish him all our best wishes for the future and finally but not least to Mike Stygle as he takes up the post of vice chair.

Looking forward to next year and the launch of the revised Agreed Syllabus, it's going to be no less a challenge but one we all yet again relish, because good RE contributes to good communities living alongside and with each other.

I have great pleasure in commending the following report to you.

Kind Regards

Ted Cooke

Chair, Waltham Forest



### 1. The local context

The community of the London Borough of Waltham Forest is culturally and socially diverse. Many people have travelled across the globe to come and make their home among us. This diversity is celebrated in the schools, shops, restaurants,

businesses, places of worship and institutions throughout the borough.

Our school population records pupils coming from over 150 different language backgrounds. This diversity is also reflected in the faiths and beliefs of our community, as well as in the varied cultural traditions of those who identify as followers within the major religious groups.

Religious background of pupils in Waltham Forest schools Sept 2017					
Religion % of pupils					
Buddhist	0.5				
Christian	27.7				
Hindu	1.7				
Jewish	0.2				
Muslim	27.3				
Sikh	0.2				
No Religion	13.8				
Religion Other	3.6				
Religion Unknown 24.8					

Source: Education Performance & Information

The borough is served by 33 maintained schools (24 primary, 9 secondary, 2 special, 2 6<sup>th</sup> form colleges), 5 voluntary aided Schools, 1 voluntary controlled, plus 24 academies (18 primary, 4 secondary, 3 special)

### 2. Religious Education

### 2.1. Locally Agreed Syllabus

SACRE established an Agreed Syllabus Conference (ASC) to review of the Agreed Syllabus for Key Stages 3, 4 & 5 in order to have in place a reformed syllabus for publication in 2020.

This revision of the Waltham Forest Agreed Syllabus sought to build on the experience of the last five years and incorporate advice from key documents that that have been issued since 2010, in particular:

- The non-statutory National Framework
  - non-religious philosophies and worldviews as part of the scope of RE programmes.
    - 50% of time in RE should be in the study of Christianity
- Incorporate clear strategies for progression in learning and identifies steps of progress.

The ASC recommended to SACRE that the Key Stage 1 & 2 Agreed Syllabus should be updated at the same time to enable a continuity of provision from



EYFS to KS5. It was also recommended that consultations should be undertaken with national providers and other LAs who may be able to a provide a model syllabus suitable and supportive to the effective provision of RE in Waltham Forest schools.

### 2.2. Standards in RE

Results at the end of KS4 GCSE RE (full course) show average points score across Waltham Forest higher than the national average for all courses entered. Of the 15 schools entering students for the full course 5 schools entered at least 95% of the KS4 cohort for the exam.

### GCSE RE (full course) 2017/18

School	NOR	entered	Avg Pts	Nat av pts
Buxton School	129	81	4.1	5.1
Chingford Foundation School	226	226	4.6	5.1
Leytonstone School	161	12	5.4	5.1
Norlington School and 6th Form	90	14	7.6	5.1
South Chingford Foundation School	87	66	4.6	5.1
Walthamstow Academy	166	31	5.2	5.1
Lammas School and Sixth Form	106	8	5.4	4.8
Willowfield School	110	104	5.4	4.8
Connaught School for Girls	117	117	5.8	4.9
George Mitchell School	94	33	4.4	4.9
Highams Park School	232	77	6.0	4.9
Kelmscott School	173	173	4.5	4.9
South Chingford Foundation School	87	21	2.5	4.9
Walthamstow School for Girls	175	56	5.9	4.9
Holy Family Catholic School	175	173	4.2	4.9

Two schools enter students for the GCSE RE (full course) in Year 10

School	NOR	entered	Avg Pts	Nat av pts
Eden Girls	50	50	6.0	n/a
Walthamstow Academy	166	1	4.0	n/a

### GCSE RE (short course) 2017/18

Since the removal of the contribution of short course data to the measure of school performance, many schools have dropped this from the offer at KS4. One school continued to offer the short course option.



School	NOR	entered	Avg Pts	Nat av pts
Highams Park School	232	153	n/a	n/a

### Frederick Bremer School did not offer an RE option at GCSE.

#### KS5 GCSE A Level Results 2017/18

School/College	NOE	A*-A	A*-B	A*-E	Avg Pts
National (all entries)	16600	23.0	52.3	98.0	34.8
Chingford Foundation School	5	40.0	60.0	100.0	38.0
Holy Family Catholic School	10	-	40.0	100.0	29.0
Leyton Sixth Form College	13	-	7.7	100.0	23.1
Sir George Monoux College	11	-	9.1	90.9	23.6

Six schools presented a total of 92 pupils with figures varying from 2 to 23. The results in the schools varied with one school achieving an average point score well above the national average; however, that particular school presented only 9 pupils. The differences in the number of entrants and results are marked but one conclusion that can be drawn is that the three schools with the highest number of entrants performed better in the higher and middle ranges (2 & 3) of scores. The three schools with the smaller number of entrants performed better in the higher range.

### KS5 GCSE A/S Level Results 2017/18

School/College	NOE	A-B	A-E	Avg Pts
National (all entries)	16130	35.8	86.4	13.5
Chingford Foundation School	23	26.1	65.2	10.0
Holy Family Catholic School	2	-	50.0	7.5
Leyton Sixth Form College	12	-	58.3	5.4
Sir George Monoux College	37	13.5	75.7	8.1
Walthamstow Academy	1	-	100.0	15.0

### 2.3. Teaching & Resources

The **Waltham Forest Schools Linking Programme** was launched in 2017. The programme has completed the second year (2018-19) with 14 classes on the programme; four secondary and ten primaries from a mix of faith and non-denominational schools. Waltham Forest SACRE have continued to be



supportive of the programme, encouraging engagement with schools but also continuing to provide a free venue for continued professional development of our teachers.

Students and children on the Linking programme:

- Take part in three engaging and memorable link days with their partner school during the academic year
- Deepen knowledge and understanding of different beliefs by engaging directly with students from different backgrounds
- Develop skills of communication, empathy and reflection

### The programme has:

- helped the schools enhance their provision for SMSC and British Values;
   foster in students an understanding and respect for difference
- give students the opportunity to reflect upon their own identity and beliefs
- offer teachers training and resources for running inter-faith and intercultural events, as well activities and ideas relevant to RE and PHSCE teaching at 3 CPD days during the academic year
- helped build partnerships between local schools.

**Key Stage 2 Peace Conferences** – 15 schools took part over 3 sessions the aims of the project were to:

- foster inquiry and acceptance amongst young people of different faiths and beliefs
- give them the opportunity to learn from and about each other in a safe but inquiring space.
- provide teachers and support staff with an opportunity to work with staff from other schools and experience teaching of RE that really engages children in deep and meaningful enquiry into their own beliefs and those of others through a range of activities.





During the project teachers were able to observe at first hand, best practice with lots of practical advice and ideas to take straight back to school. Pupils are 'trained' as peace makers and can take that back to school and 'train' other peace makers in their own school.

The feedback was very positive from all host schools and attending schools. Thanks is due to Barn Croft, George Thomlimson, Downsell and Thorpe hall schools for hosting the project.

Waltham Forest Student SACRE - Schools were invited to take part in an initial meeting and four schools signed up to a year's project to establish a Student SACRE.

Students and staff form the schools observed a very lively meeting of Newham Student SACRE and students had the opportunity to question faith and belief leaders.

There were three meetings over the year, modelled on the Newham approach.



Four schools have shown commitment to the project and the feedback from staff and students has been very positive.

Thanks is due to the staff

and students of Norlington Boys, Eden Girls, Holy Family College and Chingford Foundation schools for their commitment to making this a success.

### 2.4. Complaints about RE

from RE or collective worship.

No complaints regarding Religious education were received by SACRE during the year.

2.5. Withdrawal from RE and collective worship SACRE did not receive any notifications from schools of parental withdrawals



### 3. Collective Worship

### 3.1. Advice on Collective Worship

SACRE's published revised advice to schools and colleagues on observance of the holy month of 'Ramadan' is now available on 'The HUB' which is now a source of information and guidance open to all.

#### 3.2. Information on school websites

SACRE members carried out a small but significant piece of research into school websites and how they informed parents, carers and interested individuals about the teaching of RE and compliance with Collective Act of Worship. The variation between schools on how hey fulfill their statutory obligation to publish information was concerning. SACRE intends to follow up with further work on how other SACREs support schools to meet their obligation and how WF SACRE might provide clear guidance to schools.

#### 3.3. Determinations

SACRE has not received any requests for determinations relating to collective worship or complaints about how collective worship is delivered in school.

### 4. Links with other agencies

- 4.1. WALTHAM FOREST AND NEWHAM PROJECT 2018-19
  SACRE with Newham SACRE secured funding from in the form of a modest
  grant of £5.000 from NASACRE and The Culham Foundation. The project had
  the following aims:
  - To improve the quality of teaching and learning of Religious Education in both LAs through providing opportunities for teacher, schools classrooms and pupils and students to connect, collaborate and learn from each other.
  - To widen the debate and discussion in each SACRE through providing opportunities for SACRE members to connect with members of a another SACRE to collaborate in providing best quality guidance to schools and settings.



The Project had three distinct strands: development and training for Newham and Waltham Forest SACRE members, establish a Waltham Forest Student SACRE and a Key Stage 2 Peace conference.

# Joint SACRE Newham and Waltham Forest Meeting at Waltham Forest Town Hall: Autumn 2018.



A carefully planned meeting with a balance of 'whole group' and 'workshop sessions' engaged members at different stages of experience and with a range of expertise. Members were able to choose two workshops; The meeting was held at Waltham Forest Town Hall and was well attended by both SACREs although Newham SACRE attended in much greater numbers.

Workshops topics included,

- Place of worship competition (Newham SACRE sharing workshop) led by
   Marie Hardie, SACRE chair for Newham
- Your role on SACRE as a Councillor, faith leader or a teacher led by members of Newham SACRE and Claire Clinton, Newham SACRE consultant
- How to observe RE and CW in schools Claire Clinton, Newham SACRE consultant
- Effective monitoring of RE and CW as a SACRE led by Darra McFadyen,
   Waltham Forest SACRE consultant

The meeting overran as members engaged in very lively and wide ranging discussions. Feedback from the meeting was extremely positive.

The three chief aims of the project have been achieved.



- Waltham Forest SACRE has felt energized and enthused by meeting with a local SACRE and would like to make this an annual event
- The Student SACRE has made a careful start with four committed schools. The four schools would like to continue with joint ventures such as visits to places of worship or places of religious or belief significance.
- The Peace Conferences were a huge success, schools; it is hoped this can be extended to Key Stage 1 in 2019/20.

### 4.2. The Faith and Belief Forum

Faith and Belief Forum has worked in Waltham Forest since 2017 bringing together teachers, children and young people of all beliefs in the 'Linking Schools' programme.

The charity founded in 1997 as the Three Faiths Forum. Over the years their work has expanded to include people of all faiths and beliefs, both religious and non-religious. In 2018, they changed their name to the Faith & Belief Forum to reflect their inclusive ethos.

### 4.3. Other links

In January 2019, the Council received a presentation from the borough's "Prevent" lead officer. The suggestions were well-received. The SACRE also advises the local authority via its relationship with the school effectiveness advisor. There have been no requests from government, or from other statutory bodies, for advice

In May 2019, The Local Authority Designated Officer for Child Protection and Safeguarding (LADO) made a very welcome presentation on the LA's approach to safeguarding children and young people in education in Waltham Forest.



# Appendix A Membership

<b>Group A</b> Other Christian denominations	and otl	her faiths represented in Waltham
Forest		
African Caribbean Free Church	1	vacancy
Bah'ai	1	vacancy
Buddhism	1	Mr Pilling
Free Church	1	Rev Femi Cole-Njie
Hinduism	1	vacancy
Islam	4	Mr Akhtar, Mr Looch, Mr Qureshi,
		vacancy
Judaism	1	Mr Braham
Roman Catholic	1	vacancy
Sikhism	1	Mr Tarsem Bhogal
Pagan	1	Mr Stygal
Group B The Church of England		1 7
Appointed by the Diocese of Chelmsford	4	Mr Cooke, Fr Summers, Ms
Education Committee with the Synod of the		Waller,Fr Walsh.
Waltham Forest Deanery		
,		
<b>Group C</b> The Teachers and Educators of t	the bor	ough
Headteacher	1	vacancy
Early years	1	Ms Lloyd
Primary	1	Ms Soar
Special schools	1	vacancy
Primary Academy	1	Ms Jackson
Secondary Academy	2	Ms Joseph & Mr Loblack
Secondary Schools	2	Ms Yaquoob Mr Lloyd
KS5	1	Mr O'Neil
Higher Education	1	vacancy
School Governor	1	Mr Whitehead
Group D The London Borough of Waltham	Forest	
Elected Members	4	Cllr Rehman, Cllr Sweeden, Cllr
		Mbachu Cllr Lyons.
Director of Learning (or appropriate nominee	1	Mr Kilgallon
Humanist non-faith representative		Ms Kaufman
Others (non-voting)		
RE Advisor to WF SACRE		Ms McFadyen
Waltham Forest Faith Community Forum		Ms Smith
Faith and Community Officer (Met Police)		PC S McDonald
and and community chicon (which onloc)		1 C C MODONAIA



## Appendix B Meetings and attendance

	Au	Autumn 2018		Spring 2019		Summer 2019	
Meetings	10 <sup>th</sup> Oct	21st Nov	28 <sup>th</sup> Nov	23 <sup>rd</sup> Jan	27 <sup>th</sup> Mar	23 <sup>rd</sup> May	10 <sup>th</sup> Jul
Mr Pilling							
Rev Femi Cole-Njie							
Mr Akhtar							
Mr Looch							
Mr Qureshi							
Mr Braham							
Mr Tarsem Bhogal							
Mr Stygal							
Mr Cooke							
Fr Summers							
Ms Waller							
Fr Walsh.							
Ms Lloyd							
Ms Soar							
Ms Jackson							
Ms Joseph							
Mr Loblack							
Ms Yaquoob Mr Lloyd							
Mr Lloyd							
Mr O'Neil							
Mr Whitehead							
Cllr Rehman,							
Cllr Sweeden,							
Cllr Mbachu							
Cllr Lyons.							
Mr Kilgallon							
Ms Kaufman							
Ms McFadyen							
Ms Smith							
PC S McDonald							



### **Appendix C**

# Constitution of the Waltham Forest Standing Advisory Council for Religious Education [SACRE]

### 1. Defined Terms / Acronyms:

Adviser The LA's professional RE technical lead Agreed Syllabus The approved RE syllabus adopted by the LA

DfE Department for Education HMI Her Majesty's Inspector

LA The Local Authority known as Waltham Forest Council.

Members Nominated and approved SACRE person eligible to vote
Ofsted Office for Standards in education- the sector inspectorate
Other Persons Any member of public eligible to join SACRE but does not

hold voting right solutions for SACRE work

topics

Representative The LA's professional representative from Children's

Services

RE Religious Education

Working Parties, A delegated group from within SACRE tasked with

recommending

### 2. The purpose of the Waltham Forest SACRE is:-

- To advise the Local Authority (LA) on matters connected with collective worship in community schools and the religious education (RE) to be taught in accordance with the local agreed syllabus in community and voluntary aided schools. SACRE also provides advice to Academy, Independent and free schools within the LA boundary.
- 2. SACRE may respond to other matters regarding religious education which the borough may refer to the SACRE, or as the SACRE may see fit e.g. challenging the provider with regards to opportunities to study the subject, training of staff, and standards of achievement.
- a. SACRE is the local body to agree a "determination", for a particular school, on application by the Headteacher. Whilst the Law requires the majority of acts of collective worship in schools, to be wholly or mainly of a broadly Christian character, the Act also gives to SACRE the power to amend this requirement by a determination and put in its place an alternative form of collective worship, for some or all pupils.
  - b. SACRE may appoint a sub-committee to exercise this role which will consist of the chair, the vice chair and one representative of each SACRE group.
- 4. **To work with and actively support the Borough** in implementing the Waltham Forest Agreed Syllabus for Religious Education.



- 3. The work of SACRE will be achieved in partnership with the interested parties by:
  - a) Being given information about the existing provision for RE in schools, i.e. levels of staffing, resources, curriculum used, progress data, achievement and results.
  - b) Providing support for RE within the LA and to schools, subject to available resources
  - c) Publicising SACRE's role and function to Headteachers, Governors, Teachers, Parents, Academies, Free Schools, Independent Schools and the wider Faith Communities and the local community as a whole.
  - d) Advising those in c) about the nature of RE, its legal requirement in schools and their responsibilities for ensuring its provision.
  - e) Supporting and fostering community cohesion, citizenship and interfaith and cultural links
  - f) Encouraging members of SACRE to lead and participate in training activities
  - g) Advising resources for the support of the WF Agreed Syllabus and the promotion of good citizenship, community cohesion and interfaith links
  - h) The Council keeping up to date with national developments from HMI, Ofsted, and DfE with regard to the development and teaching of RE and provision for collective worship
  - i) Offering advice, support and participation in the Borough's complaints procedure when appropriate/on request.
  - i) Discussing in a local context national policy, in relation to RE.
- 5. (i) To publish an annual report (as per Circular 1/94) which shall:
  - a) Specify any matters in respect of which SACRE has given advice to the borough
  - b) Broadly describe the nature of advice given
  - c) Where any matter was not referred to the SACRE, give SACRE's reason for offering advice
  - d) Report on the public examination results in RE / RS for the previous school year
  - e) Report on activities undertaken to promote and develop RE and collective worship in the borough's schools and community
  - f) Describe work towards the production of/ review of/modification of the Waltham Forest Agreed Syllabus
  - g) Describe work done by SACRE to promote community cohesion in the LA.
  - (ii) SACRE may appoint a sub-committee to carry out this function which must include representatives of all four groups.

### 3. Membership

The Waltham Forest Standing Advisory Council on Religious Education (SACRE) shall consist of representative members appointed by Waltham Forest Council (the Local Authority) to represent:



Group 'A': Christians and other religious denominations as will

appropriately reflect the religious traditions of those within

the Local Authority (See appendix A)

Group 'B': The Church of England

Group 'C': Teachers Associations Recognised by the Authority and

Other educational establishments

Group 'D': The Local Authority and non-faith organisations

The Membership of the SACRE will be reviewed annually at the first meeting of the autumn term.

### 4. Composition and quorum

All Groups the composition shall be as presented in Appendix A of this document.

Meetings of the SACRE shall be quorate when at least one representative member from each of the four representative groups is present; four representatives. If the meeting is not quorate, the meeting can continue, but decisions would have to be ratified at the next meeting of the SACRE.

A Working Party meeting does not constitute a formal SACRE meeting (see paragraph 6).

### 5. Co-opted Members

The representative groups on the SACRE may co-opt other persons for such purposes and such length of time as the representative groups on SACRE decide. Co-opted members may resign at any time and may be removed by representative Groups at any time.

### 6. Working Parties

SACRE may establish and appoint members to Working Parties which may include non-members of SACRE that have the expertise to contribute to a particular subject/topic. Any established Working Party will have a 'terms of reference' for its work leading to recommendations to SACRE rather than the delegation of decision making. The composition for a working party will include a member representative from each Group of the constitution of SACRE.

#### 7. Position of Chair and Vice Chair of SACRE

The elections of the Chair and Vice Chair of SACRE shall be conducted annually by the representative members of the SACRE, at its first meeting of the council cycle.

Each represented member will have one vote for the purpose of electing a Chair and Vice Chair.

The Chair and Vice Chair of SACRE will be elected from amongst members of Groups A, B, C and D. If there is more than one candidate for either position, the candidate receiving the most votes shall be elected.



In the absence of a Chair and vice chair, an executive member shall be elected to lead the SACRE for that meeting.

The prime duties of the Chair, with the support of the Vice Chair are to:

- Manage the meetings of SACRE
- Attend meetings with the LA as necessary
- Represent the WF SACRE to other bodies (e.g. NASACRE) as required and
- To lead on any other matters as agreed by SACRE

### 8. Advisor to SACRE

The LA will allocate appropriate advisor time to the SACRE. The specific responsibilities of this advisor are to:

- Provide advice to the SACRE and any Working Parties on professional issues
- Advise and update SACRE members on any new government guidance or policy documents
- Support SACRE to carry out its role of monitoring and supporting schools within the LA for the delivery of the RE and Collective Worship curriculums.
- Provide updates and information to the LA as necessary

### 9. Voting Procedures in SACRE

On any issue to be decided by the SACRE, except as provided in Section 7 paragraph 2, only the four representative groups shall be entitled to a vote and each group shall have a single vote.

Individual representative members cannot vote separately. Co-opted members are not entitled to vote; nor are the advisor(s) to SACRE.

All issues shall be decided by a simple majority vote, there shall not be a casting vote.

All decisions taken by the SACRE, including the election of Chair and Vice Chair, shall be recorded by the Clerk in the minutes of the meeting.

### 10. Voting procedures within each Representative Group

Before any representative group casts its single vote on any issue to be decided by the SACRE it shall meet to discuss the issue. The decision of the representative group shall be determined by a simple majority vote in which each member of the group has one vote.

Issues shall be decided by a simple majority vote and there shall not be a casting vote. In the case of a tied vote the group shall abstain from voting on the issue in SACRE; this abstention should be recorded by the Clerk.

Where there is an instance when a meeting is not quorate, votes may be polled via email to the Clerk to SACRE A written proposal must be provided to members in advance of this vote requiring a yes/no vote only.

### 11. Terms of Office for Representative Members



The representative members shall hold office until such members' terms of office come to an end or they resign or they become otherwise ineligible for membership.

When a vacancy arises, the LA must attempt to appoint a replacement member to the SACRE to represent the same group as the retiring member.

Any representative/ member may resign at any time.

### 12. Declarations of Interest

Interests, whether personal or prejudicial, should be declared annually. If a member has a prejudicial/personal interest in a particular, one-off, agenda item they should declare that interest and withdraw from the meeting and take no part in the decision making process.

### 13. Disqualification

Members or co-opted members who fail to attend three consecutive meetings without a satisfactory explanation will have their membership reviewed by the SACRE. The Local Authority may remove any representative or co-opted member that has failed to attend three consecutive meetings without valid reason.

### 14. Administrative arrangements

The SACRE must utilise its allocated funding to secure a Clerk to SACRE that will:

- Draft an agenda in accordance to requirements and legislation no less than 21 days prior to the meeting
- The agenda must be distributed to all members no less than seven days in advance of the listed meeting; all information shall be sent at least electronically and in hard format as necessary
- The minutes of each meeting shall be produced and approved with the Chair and Clerk within 20 working days of the meeting, the Clerk shall distribute these minutes to all members electronically
- The minutes of each meeting shall be listed on the agenda of the subsequent meeting for approval and shall be re issued to all members with the agenda for the forthcoming listed meeting
- Maintain an attendance register of attendance at SACRE and advise on attendance matters as detailed in point 13 of the constitution
- Publish all documents relating to the SACRE on the LA's website for public scrutiny

### 15. Financial Arrangements

The LA will provide the SACRE with an allocation of funding for the purposes of maintaining the work of the committee, securing professional advice as required, resourcing syllabus development and maintaining an overview of the provision in schools.

### 16. Disputes and Complaints



The intention of SACRE is to be collaborative and collective to ensure that no particular sector or member is unduly favoured within Waltham Forest. Any disputes or complaints shall be debated and resolved by SACRE at its meetings. Should any party/parties feel that matters have not been satisfactorily resolved they should reference the Council's Complaints Policy and Procedures for guidance.

