



AVANTI SCHOOLS TRUST

Complaints and Concerns Policy



Spring 2025

Review date: Autumn 2025

COMPLAINTS AND CONCERNS POLICY

This Policy is a Category 1 Policy (Full Delegation)

This policy is in force until further notice from:	Spring 2025
This policy must be reviewed by no later than*: <i>*this refers to the term in which the Policy must be reviewed by the appropriate Committee for recommendation to the Board.</i>	Autumn 2025
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PART A: The Purpose and Process

1. About this Policy

Avanti Schools Trust aims to inspire spiritually compassionate changemakers. We strive for our schools to be places in which children and young people can learn happily and enthusiastically and where educators and administrators are empowered to be the best they can be. Schools are highly complex organisations and as with any human community, sometimes things can go wrong, and mistakes will be made. This policy explains what to do if this happens: The Policy complies with part 7 of the Education (Independent Schools Standards) Regulations 2014.

The duty to establish procedures for dealing with complaints in all of our schools lies with Avanti Schools Trust and, as such, we require all of our schools to follow this policy¹. Our complaints procedure aims to:

- be simple to understand and use
- be impartial
- be non-adversarial
- enable a full and fair investigation
- respect confidentiality where necessary
- address all the points at issue and provide an effective response and appropriate redress, where necessary provide information to school and Trust leaders so that services and provision can be improved.

We will act following our Avanti virtues: disciplined, respectful, empathetic, with integrity and courage, and grateful to take on lessons learnt from any mistakes made.

We highly recommend that if you are making a complaint that you follow this policy and our procedures.

If individual Trustees or SSC members are approached by parents/carers or others with complaints, they must refer the complainant to this procedure.

In accordance with equality law, we will consider reasonable adjustments if required, to enable complainants to access and complete this complaints procedure (e.g. providing information in alternative formats, assisting complainants in raising a formal

¹ The Policy follows closely the most recent best practice guidance published by DfE which can be found here: [Best practice guidance for school complaints procedures 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/best-practice-guidance-for-school-complaints-procedures-2020)

complaint/completing the complaints form or holding meetings in accessible locations or locations other than the school)

2. Who can make a Complaint

Any person, including members of the public, may raise a concern or make a formal complaint to the Trust about any provision of facilities or services that we provide or that are provided to the Trust or to our schools.

Unless concerns or complaints are dealt with under separate statutory or other procedures (such as appeals relating to exclusions or admissions), we will use this Policy to address and process concerns and complaints.

Note: at any stage of this process where the Head of Governance takes the view that a formal complaint would be more effectively dealt with by setting aside the formal complaints process, the complainant will be recommended and advised accordingly. The agreement of the complainant to this will be required.

3. The difference between a Concern and a Complaint

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

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

We know that it is in everyone’s interest to resolve concerns and complaints at the earliest possible stage. We aim for most issues to be resolved informally, without the need to use the formal stages of the complaints policy.

4. The Stages of a Complaint

There are four stages in our process:

- Stage 1 – INFORMAL: concerns and difficulties, dealt with informally.
- Stage 2 – FORMAL: complaints formally investigated by the Principal (or delegated senior member of staff).
- Stage 3 – FORMAL REVIEW: complaints formally reviewed by the Head of Governance (or senior member of central team).
- Stage 4 – APPEAL: appeals heard by Complaints Appeal Panel.

4.1. Stage 1 – Informal Concerns and Difficulties

- An anonymous record of all complaints dealt with under this Policy is noted on a Register and reported to the People and Governance Committee.
- Our aim is to always resolve complaints amicably at this stage.
- The complainant should raise concerns directly with the school by contacting a member of staff, either in person or by telephone.
- The school will offer/arrange an opportunity for informal discussion of concerns with an appropriate member of staff.
- Notes of all meetings will be made and kept according to GDPR regulations: these and next steps will be shared with the complainant.
- Where a concern or difficulty has not been resolved informally the complainant can submit a formal complaint under stage 2 of the procedure.

4.2. Stage 2 – Formal Complaints formally investigated by the Principal or other senior member of the school team

- The complainant should complete our complaints form (see Appendix A) and email this to our independent professional governance² support service at: avantitrust.complaints@SIPS.co.uk
- SIPS will acknowledge the complaint in writing and advise the Principal/Head of School of receipt within 5 school days. The Principal/Head of School will ensure that an independent investigation is carried out and establish all relevant facts.
- The Principal/Head of School (or designated member of senior staff) must offer to meet the complainant to understand the matter and seek a resolution.
- Once all relevant facts have been established, the Principal/Head of School (or designated member of staff) will either write to the complainant or arrange a meeting to discuss or resolve the matter.

²SIPS is an independent Professional Governance support service appointed by the Trust to provide independent administrative support to the Trust Complaints process.

- Notes of all meetings will be made and kept according to GDPR regulations. These will be confidential to the school, the Trust Executive team (if needed to review our processes) and the complainant.

4.3. Stage 3 Complaints formally reviewed by the Head of Governance or other senior member of the central team

- Requests for a Stage 3 formal complaint will only be processed if Stages 1 and 2 of the process have been completed. The request for a Stage 3 meeting **must be made in writing by completing the form at Appendix A** and sending this to:
avantitrust.complaints@SIPS.co.uk
- The SIPs Clerk “the Clerk” receiving the complaint will:
 - Record the date of receipt and acknowledge the complaint in writing (either by letter or email) within 5 school days.
 - Liaise with the Principal/Head of School to gather information about actions taken at Stage 2 of the process.
 - Liaise with the Head of Governance or senior member of the central team nominated to investigate the complaint to and provide them with all relevant paperwork.
 - Support the investigator throughout by e.g. liaising with the complainant to arrange meetings, taking summary notes of all meetings etc. All summary meeting notes are subject to GDPR and will be provided to the complainant.
- The investigator dealing with the complaint will:
 - Review all the documentation received and consider the matters raised under Stage 2.
 - Speak to the persons involved if they consider this necessary.
 - Meet with the complainant face to face, online or via the telephone³
- Following the meeting, within 20 school days⁴ of the date of receipt of the Stage 3 complaint, the Head of Governance (or the Clerk) will provide a formal written response to the complainant confirming the outcome of the review/investigation.

³ When arranging meetings with the complainant, every effort will be made by the Clerk to accommodate reasonable requests as to dates and times, having regard to the personal and employment commitments of the complainant.

⁴ All response dates set out in this Policy are target response dates. Where the target response dates may not be possible, (e.g. because of delays in arranging meetings, availability of staff, etc.) the Clerk will advise the complainant of the position.

4.4. Stage 4 Appeals referred to an Independent Complaint Appeal Panel

This is the final stage of the Trust complaints procedure.

If the complainant is dissatisfied with the outcome at Stage 3 and wishes to take the matter further, they can escalate the complaint to Stage 4.

A request to escalate to Stage 4 **must** be made in writing on the Complaint Form Appendix A and sent to: avantitrust.complaints@SIPS.co.uk within 10 school days of receipt of the Stage 3 response. Requests received outside of this time frame will be considered only if exceptional circumstances apply. They must clearly state the grounds for escalating the complaint (e.g. the outcome of the complaint is unreasonable or that the process was not followed fairly and correctly as stated in this policy). A Complaint Appeal Panel cannot be convened without the complainant stating these grounds.

- The Clerk receiving the complaint will:
 - Record the date of receipt and acknowledge the complaint in writing (either by letter or email) within 5 school days.
 - Liaise with those previously involved to gather information about actions taken at Stage 2 and 3 of the process.
 - Contact the complainant to inform them of the arrangements to be made for the panel meeting within 30 school days of its receipt.
 - In liaison with the Head of Governance arrange the panel meeting, gather, collate and send all relevant paperwork.

The Clerk will convene a meeting of the Complaint Appeal Panel. As far as reasonably possible, the meeting will be arranged in line with the availability of the complainant and the school.

If the complainant rejects the offer of three proposed dates, without good reason, the Clerk will determine when the meeting will be held. The meeting will proceed as determined by the Clerk, if necessary, in the absence of the complainant and on the basis of written submissions from the complainant and the school.

The Stage 4 Complaint Appeal Panel

The panel will normally consist of three SSC Members from another Trust school (or exceptionally a Trustee) with no prior knowledge of, and no previous involvement in any way in, the matters detailed in the complaint. All members of the panel will be independent of the management and running of the school at which the complaint has arisen. Individual

Trustees and SSC members must not be involved in any way in complaints at any stage. This is to avoid any risk of prejudicing their potential to serve on a Stage 4 Panel.

The aim of the panel meeting is to resolve the complaint and achieve reconciliation between the school and the complainant and, where things have gone wrong, to identify a remedy to put things right and to assure the complainant that their complaint has been taken seriously.

What happens before the panel meeting?

The Clerk will liaise with the Head of Governance who is authorised to identify and appoint panel members. Where exceptionally a Trustee is to be appointed, they will be nominated by the Trust Board Chair.

The Clerk will ensure that the complainant, the Principal and any other witnesses are given at least five school days' notice in writing of the date, time and place of the meeting or otherwise are in full agreement of a shorter timescale. The letter/e-mail of notification to the complainant will also inform the complainant of their right to be accompanied by a friend or relative who can act as an advocate.

The Clerk will invite:

- the Principal/senior member of the central team to attend the panel meeting and to prepare Case Papers setting out the response to the complaint (i.e. a written report with (where appropriate) supporting evidence); and
- the complainant to prepare their Case Papers setting out their complaint and why they are not satisfied with the outcomes from Stages 1, 2 or 3. Appendix A should be used for this to which may be appended any supporting evidence, documents, etc. All Case Papers must be presented in chronological order and indexed: this is to assist panel members on their consideration of the case. Case Papers will be provided by the Clerk to panel members, the Principal/senior central team members and to the complainant a minimum of five school days before the date of the meeting. All papers related to the case are subject to GDPR requirements.

A professional advisor may be invited to attend the meeting to advise the panel.

The panel will elect a Chair prior to the meeting. The Chair of the panel will endeavour to ensure that proceedings are appropriately informal and that the complainant and other participants in the meeting feel at ease.

What happens at the panel meeting?

The panel will consider the complaint and all the evidence presented. The options open to the panel are:

- to uphold the complaint in whole or in part
- to dismiss the complaint in whole or in part.

If the complaint is upheld in whole or in part, the panel will:

- decide on the appropriate action to be taken to resolve the complaint;
- where appropriate, recommend changes to the school systems or procedures to prevent similar issues in the future.

The Chair of the panel will welcome all parties and explain the process of the meeting. They will acknowledge that a panel meeting might feel uncomfortable and emotional and will emphasise the importance of respect for all involved in aiming to resolve the matter.

The complainant will be given an opportunity to explain their complaint. Additional matters must not be brought up at this point (e.g. another complaint not related to the complaint being heard). Questions may be asked by panel members to ensure that they have understood the complaint.

The school or Trust representative will then be given an opportunity to respond. Questions may be asked from the panel to ensure they have understood the school or Trust position.

Audio recordings are not permitted.

What happens after the panel meeting?

Within ten school days of the Stage 4 panel meeting, the Clerk will provide the complainant and school/Trust with the summary notes of the meeting. These are subject to GDPR and will be compiled by the Clerk and agreed with the Chair of the panel. An explanation for the decision of the panel will be included. The covering letter/e-mail to the complainant will include:

- details of how to contact the Education and Skills Funding Agency (ESFA) if they are dissatisfied with the way their complaint has been handled by the Trust;

- a summary of the action(s) taken to investigate the complaint; and
- where appropriate, details of action(s) the Trust will take to resolve the complaint.

Once the matter is concluded, the broad outcomes from the panel meeting will be reported to the school SSC and the Trust Board People and Governance Committee.

This concludes the internal complaints procedure.

Referral of Complaints to the Education and Skills Funding Agency

If a complainant is not satisfied with the way Avanti Schools Trust has handled their complaint, they may complain to the Education and Skills Funding Agency (ESFA) via the Department for Education in the following ways:

- website: www.education.gov.uk/contactus
- telephone: 0370 000 2288, or
- by writing to:

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

The ESFA expect any complaint to have exhausted the Trust's complaints procedure before contacting the complainant and cannot overturn a decision made by the Trust. Their role is to make sure that the complaint has been handled properly by following a published procedure that complies with part 7 of the Education (Independent Schools Standards) Regulations 2014.

PART B: Principles of Working

1. Behaviour of Complainants

When a complaint is made, we aim to deal with the complainant in a friendly, courteous and professional manner and the same is expected of the complainant.

Avanti Schools Trust has a duty to ensure the safety and welfare of its staff. Members of staff who are dealing with complaints are not expected to tolerate unacceptable behaviour by complainants.

Unacceptable behaviour is defined as behaviour that is unacceptable by normal standards and is disadvantageous to the individual, such as the threat of or use of harassment, verbal abuse or physical violence. Examples of unacceptable behaviour may include:

- Harassment through aggressive or abusive language or behaviour (face-to-face, by telephone, in written or electronic communications). Members of staff should not be subjected to rude, abusive, derogatory, threatening or harassing language or unwanted physical or non-verbal conduct.
- Unreasonable demands and persistent, repeated complaints about the same issue. What constitutes unreasonable demands may depend on the circumstances surrounding the behaviour but could include demanding responses or action within an unreasonable timescale, continual phone calls or letters or continuing refusal to accept a decision made in relation to a complaint.

Further detailed examples of unreasonable behaviour are set out in sections 3 and 4 below.

If Avanti Schools Trust considers that a complainant's behaviour is unacceptable then it will tell them why it finds their behaviour unacceptable and will ask them to change it. If the unacceptable behaviour continues, the school will take action to restrict future contact with the school by, for example:

- Requesting contact in a particular form (for example, letter only);
- Requiring contact to take place with a named member of staff only;
- Asking the complainant to enter into an agreement about their conduct.

Where the behaviour is so extreme that it threatens the immediate or subsequent safety and welfare of a member of staff, other options may be considered, for example, requiring the complainant to leave the premises immediately, reporting the matter to the police or taking legal action or banning the individual from school premises. In some cases, the complainant may not be given prior warning of that action.

2. Third Party and Anonymous Complaints

A third party may act on behalf of a complainant, as long as they have written consent from the complainant to do so.

Anonymous complaints will not normally be investigated; the School Principal (or Head of Governance if appropriate) will determine whether an anonymous complaint warrants an investigation. Anonymous complaints received via SIPs will be referred in the first instance to the Head of Governance.

3. Vexations or Repeated Complaints

There may be occasions when:

- despite a complaint being considered under all stages of this Policy, the Complainant persists in making the same complaint to the school; OR
- a Complainant raises unreasonably persistent complaints or raises complaints about matters which do not directly affect them; OR
- a complaint is made about a matter which is clearly so trivial that it would be a waste of the school's resources to deal with it under the formal stages of this procedure.

In these cases, the School Principal and/or Head of Governance reserves the right to regard the complaint as vexatious and/or repeated and/or trivial and to refuse to investigate it under this Policy.

Where the School Principal decides that a complaint is vexatious and/or repeated and/or trivial and accordingly that it will not be investigated, they will write to the Complainant advising them of this, within 10 school days of receipt of the complaint.

4. Unreasonable Complaints

The Trust and all Trust schools are committed to dealing with all concerns and complaints fairly and impartially, and to providing a high-quality service to complainants. We will not normally limit the contact complainants have with the Trust and the school. However, we do not expect our staff to tolerate inappropriate or hostile behaviour and will take action to protect staff from any such behaviour, including that which is abusive, offensive or threatening.

The Trust defines unreasonable complainants as *‘those who, because of the frequency or nature of their contacts with the Trust or the school, hinder our consideration of their or other people’s complaints’ or those who persist with matters that are clearly so trivial that it would be a waste of resources to continue to deal with those matters under the formal stages of this procedure.*

A complaint or concern may be regarded as unreasonable when the person making the complaint:

- fails to comply with the complaints procedure despite offers of assistance;
- refuses to co-operate with the complaints investigation process while still wishing their complaint to be resolved;
- refuses to accept that certain issues are not within the scope of the Complaints Policy;
- insists on the complaint being dealt with in ways which are incompatible with the procedure set out in this Policy or with good practice;
- introduces trivial or irrelevant information which the complainant expects to be taken into account and commented on, or raises large numbers of trivial or irrelevant questions and insists they are fully answered, often immediately and to their own timescales;
- makes unjustified or unsubstantiated complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- attempts to change the basis of the complaint as the investigation proceeds;
- refuses to accept the findings of the investigation into the complaint where the Trust Complaints Policy and procedure has been fully and properly implemented and completed including referral to the Department for Education;
- makes excessive demands on school time by frequent or lengthy contact with staff regarding the complaint, either in person, in writing, by email or by telephone whilst the complaint is being dealt with;
- uses falsified information; or
- publishes inaccurate or confidential information in any variety of media such as social media websites and newspapers.

Whenever possible, the School Principal or their nominee will discuss any concerns with the complainant informally before applying a judgement that the complaint is 'unreasonable'.

Complainants are asked to limit the numbers of communications with the Trust and its schools while a complaint is being progressed. It is not helpful and uses valuable resources if repeated correspondence is sent (either by letter, phone, email or text) as this could delay the outcome.

For complainants whose excessive contact causes a significant level of disruption, the Trust may specify methods of communication and limit the number of contacts made by specific complainants. This may be reviewed after 6 months.

In response to any serious incident of aggression or violence on behalf of the complainant, the concerns and actions taken will be put in writing immediately and the police informed.

5. Time Scales

A complaint must be registered with the Trust within three months of the alleged incident or issue, or where a series of associated incidents or issues have occurred, within three months of the last of these incidents/issues. We will consider complaints made outside of this time frame **only** if exceptional circumstances apply.

6. Complaints received outside of term time

We will consider complaints made outside of term-time to have been received on the first school day after the holiday period.

7. Scope of this Complaints Policy

This Policy covers all complaints about any facilities or services that we provide or that are provided by the Trust to our schools. Complaints about the issues listed below are expressly **excluded** from the Policy.

	Exclusions from this Policy	Who to contact
	<ul style="list-style-type: none">• Admissions to schools	Concerns about admissions are handled through a separate process – either through the appeals process or via the local authority.

<ul style="list-style-type: none"> • Matters likely to require a Child Protection Investigation 	<p>Complaints about child protection matters are handled under the Trust Child Protection and Safeguarding Policy and in accordance with relevant statutory guidance.</p> <p><i>If there are serious concerns, an individual may wish to contact the Local Authority Designated Officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH). Details of this are available from the local authority in which the school is situated.</i></p>
<ul style="list-style-type: none"> • Exclusion of children from school* <i>*complaints about the application of the School Behaviour Framework as this applies to individual Trust schools can be made through this Complaints Policy. Individual School Behaviour Policies are available on the website of each school.</i> 	<p>Further information about raising concerns about exclusion can be found at: www.gov.uk/school-discipline-exclusions/exclusions.</p>
<ul style="list-style-type: none"> • Whistleblowing 	<p>The Trust has an internal Whistleblowing Policy for all our employees, including temporary staff and workers, that can be found on the Trust website.</p> <p>The Secretary of State for Education is the prescribed person for matters relating to education for whistle-blowers in education who do not want to raise matters direct with their employer. Referrals can be made at: www.education.gov.uk/contactus.</p>
<ul style="list-style-type: none"> • Staff grievances 	<p>Complaints from employees are dealt with under the Trust's internal grievance procedures.</p>
<ul style="list-style-type: none"> • Other bodies investigating aspects of the complaint (e.g. the police, local authority (LA) safeguarding teams, Tribunals or DfE) 	<p>This may impact on the ability of the Trust to adhere to the timescales set out in the Policy or result in the procedure being suspended until those public bodies have completed their investigations. If this happens, the Complainant will be advised of the proposed new timescale.</p>
<ul style="list-style-type: none"> • Complainant commences legal action against the Trust in relation to their complaint 	<p>In this event, the Trust may decide to suspend the complaints procedure until those legal proceedings have been concluded.</p>

<ul style="list-style-type: none"> • 	<p>Staff conduct</p> <p>Complaints regarding the actions of staff may be submitted under this Policy</p>	<p>Please note however that complainants do not have the right to specify any actions to be taken with respect to staff and will not be informed of any disciplinary action taken against a staff member as a result of a complaint. A complainant will be notified that the matter is being addressed.</p> <p>Where deemed appropriate, allegations against staff will be dealt with under the Trust's Staff Disciplinary procedures, details of which will not be revealed to any complainant.</p>
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8. Resolving Complaints and Concerns

At each stage of the procedure described in the Policy, the Trust seeks to resolve the complaint/concern.

If appropriate, following consideration of a complaint/concern, we will acknowledge that the complaint/concern is upheld in whole or in part.

In addition, we may offer one or more of the following:

- a) an explanation;
- b) an admission that the situation could have been handled differently or better;
- c) an assurance that we will try to ensure the event complained of will not recur;
- d) an explanation of the steps that have been or will be taken to help ensure that it will not happen again and an indication of the timescales within which any changes will be made. (This does not include reference to any disciplinary action that may be taken against staff);
- e) an undertaking to review school policies and/or staff training arrangements in light of the complaint;
- f) an apology.

9. Withdrawal of a Complaint/Concern

If a complainant wishes to withdraw their complaint/concern, we will ask them to confirm this in writing.

If the complaint concerns the Principal of a school the complaint will be investigated by a member of the Executive Team.

If the complaint concerns:

- the Chief Executive
- Executive Leaders
- a Trustee, or
- any Member of an SSC

The complaint will be investigated by the Chair of the Trust Board (or delegated to an external professional).

If the complaint concerns the Chair of the Trust Board, the complaint will be referred to the Vice Chair for investigation (or delegated to an external professional).

If the complainant is not satisfied with the outcome of this stage, the complainant should write to the Head of Governance within 10 school days, asking for the complaint to be heard before a Complaint Panel (Stage 4). Requests received outside of this time frame will be considered only if exceptional circumstances apply.

APPENDICES

Appendix A: Stage 2, Stage 3 and Stage 4 Formal Complaint Form

[Click here to download editable form](#)

Stage 2, Stage 3, and Stage 4 Formal Complaint Form
<i>Please note:</i> <i>It is a requirement of the Policy that, starting with Stage 1, each step of the process MUST be completed before proceeding to the next.</i>
<i>Please State</i> <i>Is this a Stage 2 Complaint or a request to proceed to Stage 3/Stage 4?</i>
Your name:
Pupil's name (if relevant):
Your relationship to the pupil (if relevant):
Address: Postcode: Day time telephone number: Evening telephone number: Email address:
Please give details of your complaint, including to whom you spoke at Stage 1 and (if relevant) Stage 2/Stage 3. Please explain why you believe that your complaint remains unresolved. (Continue on a separate sheet if required).

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

(You may wish to include here your response to the letter you have received relating to the outcome of Stage 1 (or if relevant Stage 2/Stage 3).

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

Signature:

Date:

Official use

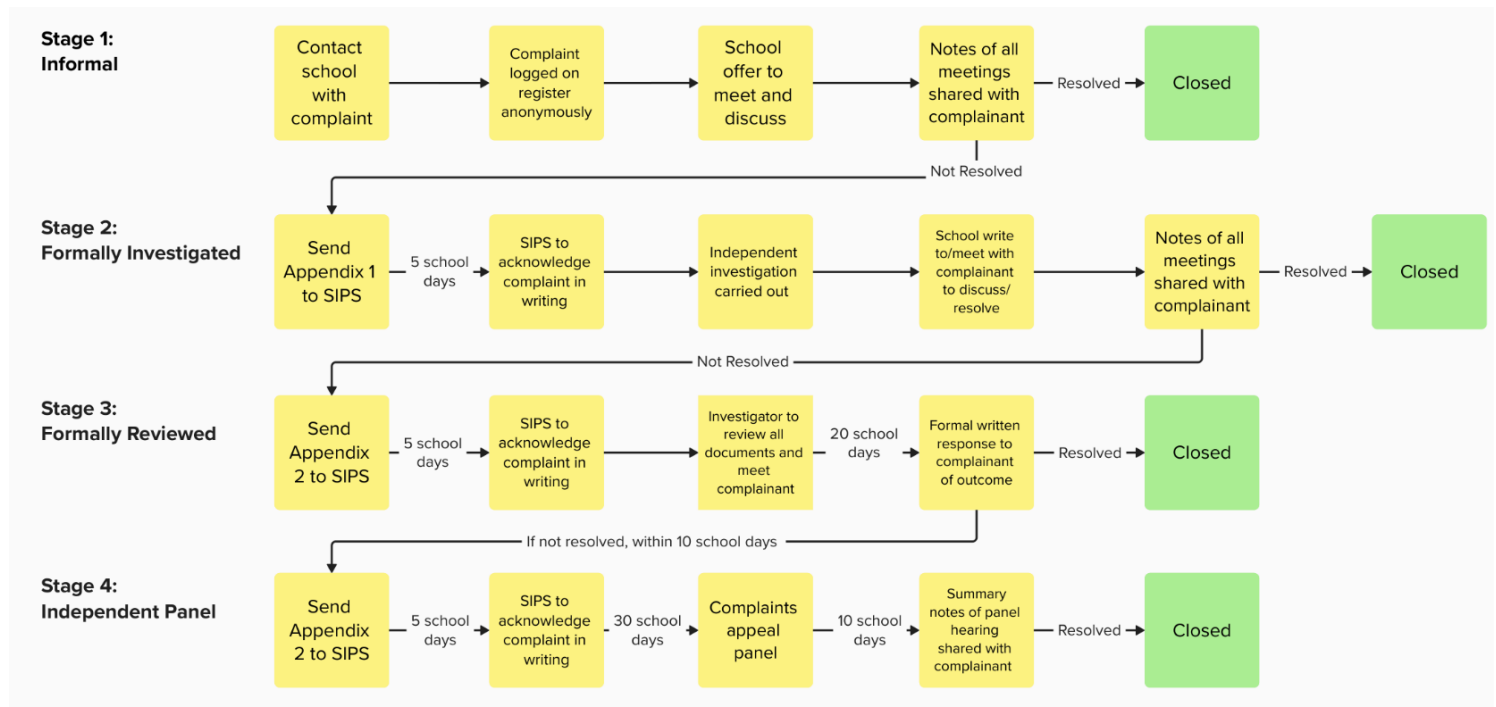
Date acknowledgement sent:

By whom:

Complaint referred to:

Action taken:

Appendix B: Complaints Process Summary Flow Chart



Appendix C: Summary of Roles, Responsibilities and Process (for information only)

Available upon request.