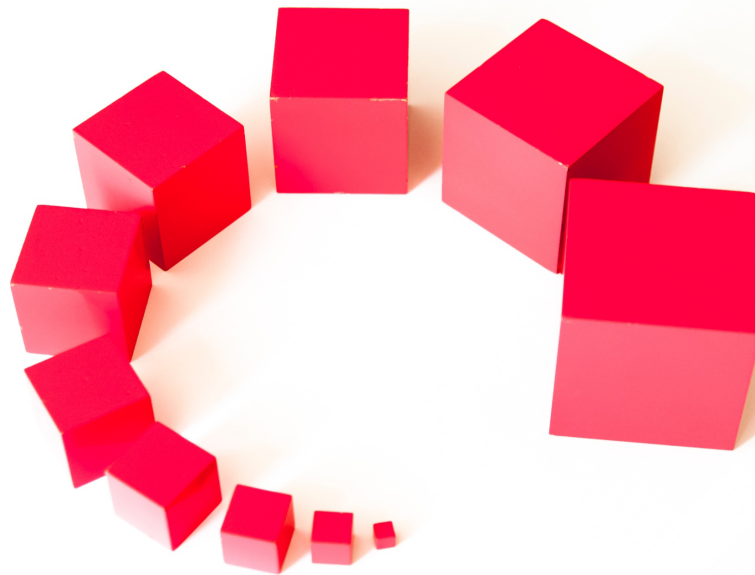




Complaints Procedure 2027

International Montessori Institute

Version 2027 | Public complaints and appeals procedure

Purpose and public availability

The International Montessori Institute (IMI) aims to provide a safe, respectful and professional learning environment. Concerns should, where possible, be resolved at an early stage. Where this is not possible, or where a person wishes to make a formal complaint, this procedure applies.

This complaints procedure is public. It is published on the IMI website and is included in, or directly referenced from, the Study Guide. The persons and bodies referred to in this procedure are identified by name in the contact details at the end of this document.

All complaints are handled confidentially. Information about a complaint is shared only with persons who need that information in order to handle, investigate or decide the complaint or appeal, unless disclosure is required by law.

This procedure applies from 2027 onwards and replaces earlier versions of the IMI complaints procedure.

Response and handling times

IMI will acknowledge and respond to a complaint within four weeks of receipt. Complaints are handled within the fixed time limits set out below. If additional investigation time is necessary, the complainant will be informed in writing before the applicable deadline, with the reason for the delay and the date by which a decision is expected.

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Article 1 – Definitions

Term	Meaning
IMI	The International Montessori Institute B.V.
Director	The Director of IMI.
RvA	Raad van Advies (Board of Advice) of IMI.
Concern	An expression of worry, doubt or dissatisfaction for which clarification or an informal solution is sought.
Complaint	A written expression of dissatisfaction concerning conduct, a decision, an omission, facilities or services provided by IMI.
Complainant	The person who submits the complaint.
Accused / respondent	The person whose conduct, decision or omission is the subject of the complaint.
Student / participant	A person registered for an IMI programme, course or training.
Staff	A person working for or on behalf of IMI, including employees, guest lecturers, contractors, trainees and temporary staff.
Confidential counsellor	A person designated by IMI to support and advise a person who is considering or has submitted a complaint. The confidential counsellor does not decide the complaint.
Complaints Committee	The internal advisory committee appointed by IMI to investigate a complaint when requested and to issue a reasoned advice to the Director or RvA.
Independent third party / appeal body	Marlies Groen, appointed by IMI in her personal and independent capacity to decide appeals under Article 8. Her decision is binding on IMI.

Article 2 – Right to complain and scope

1. Any student, participant, former student or participant, member of staff, or other person directly affected by IMI's services may submit a complaint.
2. A complaint may concern the conduct of staff or students, a decision or omission by IMI, or the provision of facilities or services by IMI.
3. A complaint should normally be submitted as soon as reasonably possible and preferably within three months after the event concerned or after the complainant became aware of it. IMI may still consider a later complaint where fairness or the circumstances justify this.
4. A complainant may withdraw a complaint at any time. IMI may nevertheless retain a minimal record of the complaint and withdrawal where required for accountability, safeguarding or legal purposes.
5. No person will be disadvantaged merely because they have submitted a complaint in good faith or assisted in the handling of one.

Article 3 – Submission of a complaint and confidential counsellor

1. Complaints must be submitted in writing to the Director, stating the complaint and the relevant facts as clearly as possible. A complaint may be submitted directly or with the support of the confidential counsellor.
2. If the complaint concerns the Director, the complaint must be submitted to the RvA. The confidential counsellor may assist the complainant with this submission.
3. IMI will acknowledge receipt in writing within five working days. The acknowledgement will identify who will handle the complaint and will confirm the applicable time limit.
4. The confidential counsellor may provide information about this procedure, support the complainant, explore whether an informal solution is possible, and help formulate the complaint. The confidential counsellor does not determine whether a complaint is well founded.
5. The confidential counsellor must treat all information received in that role confidentially, except where disclosure is required by law or is necessary to prevent a serious and immediate risk of harm.

Article 4 – Allocation and impartial handling

1. The Director decides who will handle a complaint, taking into account the nature, seriousness and complexity of the matter. If the complaint concerns the Director, the RvA makes this decision.
2. A complaint may be handled by the Director or RvA, or may be referred to the Complaints Committee for investigation and advice.
3. A person who is personally involved in the subject of the complaint, or whose impartiality could reasonably be questioned, will not handle, investigate or decide that complaint.
4. If the complainant or respondent raises a reasoned objection to the proposed internal handler, IMI will consider referral to the Complaints Committee or another impartial internal handler.
5. The independent third party named in Article 8 is not involved in the initial handling of the complaint and is only approached if an appeal is lodged.

Article 5 – Handling of a complaint

1. The handler will give the complainant an opportunity to explain the complaint and will give the respondent an opportunity to respond. The parties may be heard together or separately, depending on the circumstances and the wishes of the parties.
2. The handler may request documents, hear witnesses or experts, or obtain other information reasonably necessary to assess the complaint.
3. The complainant and respondent may be assisted by an adviser or counsellor. Any costs of such assistance are borne by the party requesting it, unless IMI agrees otherwise.
4. A written record will be made of the relevant facts, statements, documents and steps taken in the handling of the complaint.
5. IMI will provide a substantive written response and, where possible, a final internal decision within four weeks after receipt of the complaint.
6. If the complaint cannot reasonably be concluded within four weeks because additional investigation is necessary, IMI will inform the complainant in writing before the end of that four-week period. The notice will explain why more time is needed and will state the date by which IMI expects to provide the final internal decision. Any extension will normally be no longer than four additional weeks.
7. The same timing information will, where appropriate, also be provided to the respondent.

Fixed internal time limit

Normal maximum: four weeks from receipt to the final internal decision. If further investigation is needed, the complainant is informed before that deadline, with reasons and a new expected decision date; the extension will normally not exceed four additional weeks.

Article 6 – Complaints Committee

1. The Director appoints a Complaints Committee of at least two persons. The current members are named in the contact details at the end of this procedure.
2. The Complaints Committee may investigate complaints referred to it by the Director or RvA. It may hear the complainant, respondent, witnesses and experts and may request relevant information.
3. The Complaints Committee will act impartially. A member who has a conflict of interest or prior involvement in the matter will not participate in the investigation or advice.
4. The Committee will normally issue a written, reasoned advice to the Director or RvA within three weeks after referral, so that IMI can meet the time limits in Article 5. If this is not possible, the Committee will immediately inform the Director or RvA of the reason and the expected date of its advice.
5. The Committee's advice forms part of the internal complaints process. The Committee is not the independent appeal body referred to in Article 8 and its advice is not binding on the independent third party.
6. Members of the Complaints Committee are required to maintain confidentiality.

Article 7 – Internal decision and measures

1. The Director will issue the final internal decision on a complaint, unless the complaint concerns the Director; in that case the RvA will issue the final internal decision.
2. The decision will be in writing, will state the reasons for the decision, and will indicate whether the complaint is wholly or partly well founded or unfounded.
3. Where a complaint is well founded, the decision will state what corrective or other measures IMI will take and, where possible, the time limit for those measures.
4. The final internal decision will inform the complainant of the right to appeal to the independent third party named in Article 8 and will provide her contact details.
5. Internal decisions, measures taken and completion of those measures will be recorded in the confidential complaints register.

Article 8 – Appeal to the independent third party

Independent third party:

Marlies Groen

Email: marliesg@xs4all.nl

Telephone: 06 26066702

1. A complainant who disagrees with the final internal decision may lodge a written appeal with Marlies Groen within four weeks after receiving that decision. The appeal should state the reasons for disagreement and should include the internal decision and any documents on which the complainant wishes to rely.
2. Marlies Groen has been appointed by IMI in her personal capacity as the independent third party for appeals under this procedure. She is not an employee of IMI, is not subordinate to IMI and must not have been involved in the earlier handling of the complaint. She acts independently of the Director, RvA and Complaints Committee.
3. Marlies Groen acts in her individual capacity and not as a disputes committee, professional association, interest group or other professional body. Accordingly, no membership of such a body is relied upon for this appeal mechanism.
4. The independent third party will give both the complainant and IMI a fair opportunity to present their position and may request any information reasonably necessary to decide the appeal.
5. The independent third party will issue a written and reasoned decision within four weeks after receiving a complete appeal. If additional investigation is required and more time is reasonably necessary, she will inform both parties in writing before the end of that period, explain the reason for the extension and state the date by which the decision is expected. Any extension will normally be no longer than four additional weeks.
6. The decision of the independent third party is binding on IMI. IMI will implement any consequences arising from that decision within four weeks after the decision, unless the decision itself specifies a shorter or different reasonable implementation period.
7. IMI will confirm in writing to the complainant and the independent third party when the required consequences have been implemented.
8. The binding nature of the appeal decision for IMI does not prevent either party from subsequently submitting the dispute to the competent court.

Binding appeal

Marlies Groen is the named independent third party. Her written decision on the appeal is binding on IMI. IMI implements the consequences within four weeks, after which the ordinary route to the competent court remains open.

Article 9 – Registration, confidentiality and retention

1. Every formal complaint and the manner in which it is handled will be registered in a confidential complaints register.
2. The register will record at least: the date of receipt; the nature of the complaint; the persons or functions involved; the handler; the relevant procedural steps; correspondence and findings; the internal decision; any appeal and appeal decision; measures to be taken; and the date on which those measures were completed.
3. Complaint files and the corresponding registration will be retained for five years after the complaint has been finally concluded, unless a longer retention period is required by law or is reasonably necessary in connection with ongoing legal proceedings.
4. Access to complaint files is restricted to persons who require access for the handling, administration, appeal, safeguarding, audit or legal management of the matter.
5. Information obtained through the complaints process will be treated confidentially by the Director, RvA, confidential counsellor, Complaints Committee, independent third party and any other person involved in the handling of the complaint.
6. IMI may use anonymised information about complaints to improve the quality of its programmes and procedures.

Article 10 – Reporting serious incidents

1. If a complaint concerns conduct that may constitute a criminal offence, serious safeguarding issue, sexual harassment, aggression, violence, bullying, discrimination or another serious incident, IMI may take immediate protective measures and may cooperate with the police, inspectorate or other competent authority where appropriate or required by law.
2. Such reporting or cooperation does not automatically end the internal complaints procedure. IMI will determine whether and how the internal procedure can continue without prejudicing an external investigation or the safety of persons involved.
3. Where confidentiality must be limited for legal or safeguarding reasons, disclosure will be limited to what is reasonably necessary.

Article 11 – Publication, review and final provisions

1. This procedure is published on the IMI website and is included in, or directly referenced from, the Study Guide. The current version must remain readily accessible to students and participants.
2. IMI will keep the names and contact details of the functionaries in this procedure current. Where a functionary changes, the public version of the procedure will be updated without undue delay.
3. IMI will periodically review this procedure and amend it where necessary to ensure that it remains clear, effective and consistent with applicable requirements.
4. In circumstances not expressly covered by this procedure, IMI will act in accordance with the principles of fairness, impartiality, confidentiality and reasonable timeliness. Nothing in this clause may be used to restrict the complainant's right of appeal under Article 8.
5. If there is any inconsistency between an informal practice and this written procedure, this written procedure prevails.

Contact details

Role	Name	Email	Telephone
Confidential counsellor	Kainah Marx	k.marx@imi-global.nl	0031-649738163
Director	Anne Elzerman	a.elzerman@imi-global.nl	0031-642067136
Complaints Committee	Iris Wijker	i.wijker@imi-global.nl	0031-630572093
Complaints Committee	Silke van den Berg	s.vdberg@imi-global.nl	0031-613324271
RvA	Frans Bolsius	fgmbolsius@hotmail.com	0031-637312301
RvA	Anneloes v/d Graaff	directie@montessorischoolparkrijk.nl	0031-652052286
Independent third party / appeal body	Marlies Groen	marliesg@xs4all.nl	06 26066702