

POLICY DOCUMENT 016: Complaints

Access: Unrestricted

Publish to: All Staff, All Pupils & School Website

Status: Statutory

Approval level: Full Governing Body

Review	Reviewed	Signed	Date of next	Frequency
Responsibility	date	off	review	Of review
Head	18-11-2019	28/11/2019	18-11-2020	Annually
		Andrea Faustino		
Business Manager	05-07-2021	08/07/2021	05-07-2022	Annually
		Andrea Faustino		
Business Manager	05-07-2022	29-09-22	01-07-2023	Annually
		FGB		
Business Manager	17-08-2023	FGB	17-08-2025	2 Years
Business Manager	01-09-2025		01-09-2027	2 Years

SCHOOL COMPLAINTS POLICY

Introduction:

- The Polygon School belongs to the Southampton Cooperative Learning Trust group of schools and its own complaints procedure.
- The policy proposes a 4 stage complaints process. A summary version of the Policy has also been drafted for the use of those wishing to make a complaint; this is included within Appendix 2.
- It is proposed that the School Business manager acts as co-ordinator for the administration of complaints.
- This policy will be reviewed every two years, or earlier to take account of changes in legislation.
- For the school to be able to investigate a complaint, it needs to be made within one year of the incident occurring. If a complaint is older than a year it will not normally be investigated. Conciliation between the school and the complainant can be considered at any time, within the informal or formal stages outlined in this policy.

Key Principles:

 Polygon School regards all expressions of dissatisfaction or complaints from parents and other members of our local community very seriously - we want people to feel that they can raise concerns and to know how to lodge a formal complaint if they feel they need to.

Aims:

- to encourage resolution of issues by informal means
- be impartial and non-adversarial
- to ensure a full and fair investigation
- to provide an effective response and appropriate redress, where necessary
- to respect the confidentiality of pupils and staff of the school.

Definition of a complaint:

- A complaint within the terms of the procedures described in this policy is defined as an expression of dissatisfaction which is made verbally or in writing by parents / carers of a young person who attends the school. All such complaints will be investigated.
- A complaint will not be considered under these procedures if it relates to:
 - the National Curriculum
 - Sex Education

- Admissions
- Exclusions
- Special Educational Needs
- Child Protection or Safeguarding
- School re-organisation
- Public examinations
- Serious complaints against staff, including whistle blowing
- Services provided by other provider on school site who have their own complaints policy/procedure

Separate statutory procedures exist for such complaints, and as such they need to be referred to the Local Ombudsman or The Secretary of State.

- This policy may be used by anyone who has a concern or complaint about any aspect of the school. In the main this will mean the parents and carers of the school's pupils, but may include neighbours of the school, or any other members of the local community.
- After initial investigation of the complaint, a decision might be made to use disciplinary or other appropriate procedures if it concerns a member of staff. In such circumstances the complaints procedure may be halted and the alternative procedures followed. The complainant will be advised of this and the reasons. Where the concern relates to the Headteacher, the complainant will be advised to contact the Chair of Governors directly. A complaint against the Chair of Governors or any individual Governor should be addressed to the Clerk to the Governing Body at the school.

The handling of complaints:

The prime aim of Polygon School's policy is to resolve the complaint as fairly and speedily as possible. All complaints will be dealt with in a sensitive and impartial. Particular consideration will be given to:

Confidentiality

All conversations and correspondence will be treated in confidence. Complainants have the right to know what use will be made of personal information and, accordingly, personal information will only be shared between staff, governors and other parties on a 'need to know' basis.

Equal access, accompaniment and representation

Polygon School recognises that, due to language, literacy or cultural difficulties, not all complainants will be able to fully comply with the procedures for dealing with complaints. In such instances the procedures will be applied flexibly and all appropriate support and advice will be given to complainants. This will include the right for complainants to be accompanied or represented by a friend or relative at discussions and hearings and/or to submit formal complaints which have been written by another individual on their behalf.

Should any meeting need to be held where any parties would have difficulties in terms of access, the school will assist with providing an appropriate venue.

Equal respect will be granted to all individuals involved and differences between people will be respected and understood.

Changes to time limits and deadlines

Every effort will be made to adhere to the time limits and deadlines in this policy. In certain circumstances, however, it may be deemed inappropriate or impossible to guarantee that this will occur. Where, for example, a complaint leads to criminal proceedings this will always be the case. If and when it becomes necessary to alter the time limits and deadlines set out within this policy, the complainant will be informed and given an explanation as to why this has been the case.

Unreasonable complaints

The Chair of Governors may also write to a complainant if the complaint has already been considered or if the investigation has been closed. Such complaints will be deemed to be serial or persistent. For further information you should refer to the section within this policy named 'Unreasonable Complaints'.

Anonymous and Malicious complaints

Anonymous complaints will not normally be considered under this procedure and malicious complaints may incur appropriate action by the school.

The outcome of a complaint:

- At each stage of the complaints procedure, the conclusion will be either:
 - a) That the complaint is upheld (in part or in full) and, where appropriate, some form of action is taken
 - b) That the complaint is not upheld and reasons for this are clearly given.
- Where a complaint is upheld it may be appropriate to offer one or more of the following:
 - an apology
 - > an explanation
 - an admission that the situation could have been handled differently or better
 - > an assurance that the event complained of will not recur
 - an explanation of the steps that have been taken to ensure that it will not happen again
 - an undertaking to review school policies in light of the complaint
- Where a complaint is not upheld the complainant may either choose to take no further action or to take their complaint to the next relevant stage.

The Polygon School Staged Complaints Policy

In summary, the stages for dealing with a complaint are as follows: -

- Stage 1 a concern is raised informally with a staff member.
- Stage 2 a formal complaint is heard by the Head teacher.
- Stage 3 a formal complaint is heard by the Governing Body Complaints Appeal Panel.
- Stage 4 complaint is heard by Local Government Ombudsman, the Secretary of State or Ofsted

Stage 1 | Raising a concern

Concerns can be raised with the school at any time and will often generate an immediate response, which will satisfactorily resolve the concern. Complainants will be directed to make their first contact with the appropriate member of staff which will normally be the pupil's Class tutor or Key Stage leader. For Key Stage 4 (Years 10 and 11) this is Chris Morley; for Key Stage 3 (years 7,8 and 9) this is Hayley Ifould. For the Stretch programme this is Matt Harvey. The vast majority of concerns should be satisfactorily dealt with in this informal way.

The following procedures will be followed:

Timescales: requests for a meeting or conversation with a member of staff will be responded to within 3 school days and any such meeting or discussion will be held within a further 10 school days. If the complaint requires further investigation or discussion with others the complainant will be provided with an informal response within 5 school days. The response may be provided via a further meeting, a note, telephone call or email.

Monitoring: It is not considered necessary to record or monitor complaints at this informal level.

Options for complainant: If the individual is dissatisfied with the response they have been given and would like to take their complaint further, they should be provided with a copy of the school Complaints Policy and advised how to move on to the next stage. Complainants should write to or call the school within 10 school days of receiving an informal response if they wish to proceed to Stage 2.

Stage 2 | Complaint heard by Headteacher

This is the first stage of the formal complaints process. The following procedures will be followed:

Informal discussion with headteacher: before proceeding with a formal investigation, the headteacher will meet with the individual and discuss their concerns. It may still be appropriate and satisfactory to reach an informal resolution at this point. If not, the headteacher will decide whether the individual's complaint will be dealt with by this policy or another statutory procedure and advise them on what they will need to do.

Submitting a formal complaint: by this stage it will be clear that the concern is a definite complaint which will be dealt with according to this policy. Complainants should be asked to formally submit their complaint in writing using the form attached as Appendix 1. As indicated earlier, all complainants have the right to submit formal complaints which have been written by another individual on their behalf.

Timescales: the Head teacher will formally acknowledge receipt of the complaint within 3 school days and begin an investigation.

The investigation: the Head teacher will need to investigate the complaint and review any relevant documentation and information. If necessary, the headteacher will interview witnesses and take statements from those involved. If the complaint centres on a pupil, the pupil will also usually be interviewed. As indicated within the 'equal access, accompaniment and representation' section of this document, all individuals have the right, at this or any other stages, to be accompanied or represented by a friend or relative at discussions and hearings. This includes the right of teachers to be accompanied by a representative from their Trade Union. When pupils are interviewed, an additional member of staff should always attend.

Response: the Head teacher will provide the complainant with a full written response within 20 school days of receipt of a formal complaint. This response will determine whether or not the complaint has been upheld, the reasons why, and what action (if any) will be taken.

Options for complainant: if the individual is dissatisfied with the response they have been given and would like to take their complaint further, they should be referred to the school Complaints Policy and advised how to move on to the next stage. Complainants should write to or call the school within 10 days of receiving a formal response if they wish to proceed to Stage 3.

Stage 3 | Complaint heard by the Governing Body Complaints Appeal Panel

Complaints should only rarely reach this formal level. Upon receiving a formally submitted complaint at this stage the Chair of Governors will usually choose to deal with it by holding a Complaints Appeal Panel hearing. The aim of the Appeal Panel hearing is to impartially resolve the complaint and to achieve reconciliation between the school and the complainant. In some cases, however, it may be possible and appropriate for the Chair to resolve the issue with the complainant by other means without the need for a Panel to be convened.

The following procedures will be followed:

Submitting a formal complaint: within 10 days of receipt of the notification of the outcome of a Stage 2 complaint the complainant must submit a written request to the Chair of Governors asking for their concerns to be considered by a Complaints Appeal Panel.

Timescales: the Chair of Governors will acknowledge receipt of this letter in writing within 5 school days. This letter will inform them that their complaint will be heard by a Complaints Appeal Panel which will usually take place within 20 school days.

The Complaints Appeal Panel: the Chair of Governors will select 3 governors to form an Appeals Panel. They will be governors who have no previous knowledge of, or involvement in, dealing with the complaint. If sufficient governors are not available to form a Panel, the Chair may co-opt governors from another Southampton school. Arrangements for the convening of the Panel and the conduct of the meeting are set out in Appendix 2.

Response: the Chair of Governors will provide the complainant with a full written response with 5 days of the conclusion of the Panel meeting. This response will determine whether or not the complaint has been upheld, the reasons why, and what action (if any) will be taken.

Options for complainant: The governors Appeal Panel hearing is the last school-based stage of the complaints process. If the individual remains dissatisfied with the response they have been given and would like to take their complaint further, they should be referred to the school Complaints Policy and advised how to move on to the next stage.

In cases where the matter concerns the conduct of the Head teacher, he / she and the Chair of Governors will be informed of the complaint. The Chair will be responsible for making arrangements for the matter to be investigated; if appropriate the Chair may seek the advice of officers of Southampton City Council. In cases where the matter concerns the conduct of a member of the Governing Body the member will be informed of the complaint.

Stage 4 | Complaint heard by the Local Ombudsman, Ofsted or The Secretary of State

Complainants are entitled to complain to the Local Ombudsman or The secretary of State if they believe that their complaint was not handled fairly and in accordance to the school's Complaints Policy.

Submitting a complaint:

Complaints to the local ombudsman must be submitted via a form available online at http://www.lgo.org.uk/contact-us or by phone on 0300 061 0614.

Complaints to Ofsted can be made via their online form which can be found on the Gov.uk website.

If you wish to write to the Secretary of State, you can do this by post to the following address: The Secretary of State, Sanctuary Buildings, Great Smith Street, London SW1P 3BT

Publicising the Policy:

- A summary leaflet version of this Policy is available for complainants (see Appendix 3).
- This policy will be included within the school's website and may also be included, as appropriate, within the following:
 - the governors' report to parents;
 - > the information given to new parents when their children join the school;
 - the information given to pupils at the school;
 - home-school agreements;
 - home-school bulletins or newsletters;
 - documents supplied to community users including course information or letting agreements;
 - posters displayed in areas of the school that will be used by the public, such as reception or the main entrance.
- All school staff and members of the governing body will be made aware of the complaints procedure and the various stages involved.

Circumstances under which stages of the procedure should be missed out:

This policy sets out the most suitable and effective process for dealing with the majority of complaints which are not covered by alternative statutory procedures. In most cases any concern or complaint, regardless of whose attention it is initially brought to, should be discussed informally (Stage 1) before being submitted at any of the following consecutive formal stages. However, occasionally there will be circumstances under which it is unsuitable for complaints to be dealt with in this way.

In all cases where the complaint concerns the school's head teacher directly, stage 2 will be missed out and the formal complaints procedure will begin at stage 3. In some cases, it may be deemed inappropriate for individuals to discuss their concerns informally. In such cases, complainants may be directed to contact the head teacher directly (i.e. begin at stage 2). Complainants may choose to contact the head teacher directly of their own accord. In these cases it will be at the discretion of the Head teacher as to whether or not it is appropriate for the complainant to discuss the matter informally (i.e. return to stage 1).

If and when complaints about the school are brought to the attention of Southampton City Council, the majority of complainants will be advised to contact the school and to follow the procedures set out within this document from stage 1 onwards. In whistle blowing cases it will be investigated by Southampton City Council.

Complaints against school staff:

If a complaint is made involving a member of staff, that member of staff has the right to be informed of the complaint and is entitled to be accompanied to any meeting investigating the complaint with a colleague and / or a Union representative. In some circumstances it may be necessary for a complaint to be considered under the school's disciplinary procedure for employees, rather than the Complaints Policy. Complainants will be advised if these procedures are to be used in dealing with your complaint.

Complaints from Staff against Parents:

Governors take seriously the right of all school staff to be treated with respect and dignity at all times. Staff have the right to complain about any form of abuse, harassment, threat, intimidation or violence from parents or members of the public. These threats will be taken seriously and appropriate action will be taken.

UNREASONABLE COMPLAINTS

The Polygon School is committed to dealing with all complaints fairly and impartially, and to providing a high quality service to those who complain. We will not normally limit the contact complainants have with the school. However, we do not expect our staff to tolerate unacceptable behaviour and will take action to protect staff from that behaviour, including that which is abusive, offensive or threatening.

The Polygon School defines unreasonable complainants as 'those who, because of the frequency or nature of their contacts with school, hinder our consideration of their or other people's complaints'.

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

- Refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;
- Refuses to cooperate 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 a complaints procedure;
- Insists on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure 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 detailed but unimportant
 questions, and insists they are fully answered, often immediately and to their own
 timescales;
- Makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- Changes the basis of the complaint as the investigation proceeds;
- Repeatedly makes the same complaint (despite previous investigations or responses concluding that the complaint is groundless or has been address);
- Refuses to accept the findings of the investigation into that complaint where the school's complaint procedure has been fully and properly implemented and completed including referral to the Department for Education;
- Seeks an unrealistic outcome;
- Makes excessive demands on school time by frequent, lengthy, complicated and stressful contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.

A complaint may also be considered unreasonable if the person making the complaint does so either face-to-face, by telephone, in writing or electronically;-

- Maliciously;
- Aggressively;
- Using threats, intimidation or violence;
- Using abusive, offensive or discriminatory language;
- Knowing it to be false;
- Using falsified information;
- Publishing unacceptable information in a variety of media such as in social media websites and newspapers

Complainants should limit the number of communications with a school while a complaint is being progressed. It is not helpful if repeated correspondence is sent (either by letter, phone, email or text) as it could delay the outcome being reached.

Whenever possible, the Headteacher or Chair of Governors will discuss any concerns with the complainant informally before applying the 'unreasonable' marking.

If the behaviour continues the Headteacher will write to the complainant explaining that their behaviour is unreasonable and asking them to change it. For complainants who excessively contact The Polygon School causing a significant level of disruption, we may specify methods of communication and limit the number of contacts in a communication plan. This will usually be reviewed after 6 months.

In response to any serious incident of aggression or violence, the concerns and actions taken will be put in writing immediately and the police informed. This may include banning an individual from The Polygon School.

Barring from the School Premises:

Although fulfilling a public function, schools are private places. The public has no automatic right of entry. Schools will therefore act to ensure they remain a safe place for pupils, staff and other members of their community.

If a parent or carer's behaviour is a cause for concern, a school can ask him/her to leave school premises. In serious cases the Headteacher or the local authority can notify them in writing that their implied licence to be on school premises has been temporarily revoked subject to

any representations that the parent or carer may wish to make. Schools should always give the parent / carer the opportunity to formally express their views on the decision to bar, in writing.

The decision to bar should then be reviewed, taking into account any representations made by the parent, and either confirmed or lifted. If the decision is confirmed, the parent / carer should be notified in writing, explaining how long the bar will be in place.

Anyone wishing to complain about being barred can do so, by letter or email, to the Headteacher or Chair of Governors. However, complaints about barring cannot be escalated to the Department for Education. Once the school's own complaints procedure has been completed, the only remaining avenue of appeal is through the Courts; independent legal advice must therefore be sought.

APPENDIX 1: POLYGON SCHOOL COMPLAINTS FORM

Please complete and return to School Business Manager, Polygon School, Handel Terrace, Southampton, SO15 2FH. Tel. 023 8063 6776. The complaint will be acknowledged, a receipt issued and an explanation of what action will be taken will be offered

Your name:			
Pupil's name:			
Your relationship to the pupil:			
Home Address:			
Postcode:			
Day time telephone number:			
Evening telephone number:			
Please give details of your complaint.			
What action, if any, have you already taken to try and resolve your complaint.			
(Who did you speak to and what was the response)?			

What actions do you feel might resolve the problem at this stage?		
what actions do you reel might resolve the problem at this stage:		
Are you attaching any paperwork? If so, please give details.		
6. 7 p. 1		
Signature:		
Date:		
Official use		
Date acknowledgement sent:		
By who:		
Complaint referred to:		
Date:		
Date.		

APPENDIX 2: COMPLAINTS APPEALS PANEL

The Role of the Chair of Governors

The role of the Chair is to:

- select a clerk for the Appeals Panel
- ensure that the correct procedures are followed;

The role of the Clerk

The Complaints Appeal Panel must be clerked. The clerk may be a member of the school staff, the clerk to the governing body or another governor.

The Chair of Governors will contact the nominated clerk and ask him / her to begin making preparatory arrangements. The role of the clerk will be to:

- Co-ordinate selection of the three governors who will make up the Panel who will act as chair
- Set the date, time and venue of the hearing, ensuring that the dates are convenient to all parties and that the venue and proceedings are accessible
- Collate any written material and send it to all parties at least 5 days in advance of the panel hearing
- Meet and welcome the parties as they arrive at the review
- Record the proceedings
- Notify all parties of the Panel's decision

The Role of the Chair of the Complaints Appeals Panel

In advance of the meeting the Panel will select a chair from amongst its members. The chair will have a key role and will need to ensure that:

- the remit of the Appeals Panel is explained to all parties and each party has the opportunity of putting their case without undue interruption
- the issues are addressed
- key findings of fact are made
- parents and others who may not be used to speak at such a review are put at ease
- the review is conducted in an informal manner with each party treating the other with respect and courtesy
- the committee is open minded and acts independently
- no member of the committee has a vested interest in the outcome of the proceedings or any involvement in an earlier stage of the procedure
- each side is given the opportunity to state their case and ask questions
- written material is seen by all parties in advance of the Panel hearing. If a new issue arises it would be useful to give all parties the opportunity to consider and comment on it.

the complainant is notified of the Panel's decision, in writing, within 5 school days. This letter will explain if there are any further rights of appeal and, if so, to whom they will need to be addressed.

The role of Panel members

It is important that the governors who make up the Appeals Panel act in an independent and impartial manner on behalf of the governing body. As such the appeal should be dealt with by governors who have had no prior knowledge or involvement in the case. Should it not be possible to identify three governors who meet these criteria the Chair of Governors should select governors from another Southampton school(s).

The Panel hearing

The hearing should allow each party involved to explain their understanding or interpretation of events and for other parties to question them. The hearing will, therefore, usually operate according to the following format:

- The chair will introduce all parties to one another and explain the principles, objectives and format of the hearing
- The complainant will be given the opportunity to explain their complaint. Following this the headteacher, relevant teaching staff and members of the Complaints Panel will be allowed to ask the complainant questions
- The Head teacher will then be given an opportunity to explain the school's official response, interpretation or view about the complaint. Following this the complainant and Panel will be allowed to question the Head teacher / staff
- Every party will be given the opportunity to call witnesses and question witnesses called by other parties
- The Head teacher and the complainant will both be given the chance to give final statements
- The hearing will be concluded by the chair of the Panel who will explain that the committee will consider its decision and write to all parties within 5 school days informing them of the outcome

NB. This format will need to be altered under certain circumstances, including instances where the complaint concerns the Head teacher. Ultimately, the chair of the meeting has control over its proceedings.

After the hearing

The committee will then consider the complaint and all the evidence presented and:

- Reach a unanimous, or at least a majority decision, on the complaint;
- Decide upon the appropriate action (if any) to be taken;
- Where appropriate, suggest changes to, or request a review of, the school's systems
 or procedures to ensure that problems of a similar nature do not happen again.

This information will be included in both the letters to the Head teacher and the complainant.

APPENDIX 3: SUMMARY COMPLAINTS POLICY (for prospective complainants)

POLYGON SCHOOL - MAKING A COMPLAINT

We welcome suggestions for improving our work in school. Be assured that, no matter what you want to tell us, our support and respect for your child will not be affected in any way. Please tell us of your concern as soon as possible. Whilst we receive very few complaints we do appreciate the assistance of parent/carers in addressing any problems that may arise.

Resolving your complaint

Most concerns and complaints can be sorted out quickly by speaking with your child's class teacher. If, having spoken to the class teacher, you still have concerns, you should see the Headteacher. The head teacher will investigate the problem and discuss their findings with you so that we can find a way forward together which serves the best interests of both the school and your child. In the unlikely event of the problem remaining unresolved you can also ask school governors to consider the matter. As a final option you can also ask the Local Government Ombudsman, Ofsted or The Secretary of State to investigate your complaint.

Polygon School has a staged approach to dealing with complaints

Stage 1: Informal Action

- Parents should first discuss their concerns with the class teacher who will provide a response within 15 days
- If the teacher is unable to deal immediately with the matter, a clear note will be made, including your name, phone number and date, and you will be contacted as soon as the matter has been investigated. The teacher may also consult the Headteacher at this stage.
- The teacher will ensure that you are provided with a clear explanation of what action or monitoring of the situation has been agreed.
- If no satisfactory solution has been found, you will be asked if you wish the concern to be considered further by the Headteacher. If so, you must notify the school within 10 school days.

Stage 2: Referral to the Head teacher (operational)

- The Headteacher will acknowledge your complaint, orally or in writing, within 3 working days
- A meeting will be arranged with you to clarify and supplement any information given.
- The Head teacher will investigate further, interviewing witnesses as appropriate. If the complaint concerns a pupil, the pupil would normally be interviewed with a parent present or, if this is not possible, with a member of staff who is not directly involved.
- The Headteacher will keep written records of meetings, telephone conversations and other documentation.
- Once all relevant facts have been established, the Head teacher will respond in writing to you within 25 days of the complaint having been received.
- If you are still unsatisfied you will be asked if you wish your complaint to be considered by governors. If so, you must write to the governing body within 10 school days.

Note: If your complaint is against the Head teacher, the matter will go straight to Stage 3.

Stage 3: Review by the Governing Body Complaint Appeals Panel

The Chair of Governors will acknowledge receipt of your complaint and explain arrangements for it to be considered by an Appeal Panel of three members of the School's Governing Body. This will normally take place within 20 working days.

- The governors involved in the Panel will have no prior involvement with the complaint and will elect a Chair for the committee. All relevant documentation regarding the complaint will be given to the members of the committee as soon as possible.
- The Chair of the Committee will write and inform all concerned of the date, time and place of the meeting at least 5 working days in advance. You will have the right to be accompanied to the meeting by a friend or adviser and the right to submit further written evidence.
- The Chair of the Committee will ensure that the meeting is properly conducted and minuted.
- After the meeting, the Committee will consider the evidence and a written decision will be sent to you and the Headteacher within 5 working days.

Stage 4: Complaint heard by Local Ombudsman, Ofsted or The Secretary of State

- If you are dissatisfied with the schools investigation of your complaint you can ask the above to investigate that the school has complied with its Complaints Policy. You will need to write explaining your complaint, the actions taken by the school and why you feel it has not been dealt with fairly and in accordance with the schools Policy
- If the school is found to have acted unfairly your complaint will be re-considered by governors under Stage 3.