



UCFB|GIS*

Complaints Policy

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*UCFB|GIS is the trading name of University Campus of Football Business Limited

1. Purpose

- 1.1. This policy provides information on how UCFB|GIS responds to complaints against the services provided in the delivery of higher education.
- 1.2. This policy ensures that student complaints are dealt with fairly, promptly and at the appropriate level.
- 1.3. Whilst it is recognised that complaints raised by its students will be the primary originator of complaints, the principles and steps presented will also apply to complaints submitted by other stakeholders and interested parties.
- 1.4. Students will not be disadvantaged because of the making of a complaint in good faith under this policy and procedure.
- 1.5. UCFB|GIS is committed to providing a high-quality experience for each student. It recognises, however, that on occasion a student may be dissatisfied with or concerned about an aspect of their experience and may wish to pursue this further.
- 1.6. The Complaints Procedure will:
 - Describe the procedure whereby students may raise issues of concern about courses, facilities or services provided by UCFB|GIS, or about actions, lack of actions or omissions by UCFB|GIS or its staff.
 - Provide students with a structured procedure to escalate such issues where it has not proved possible to resolve a complaint to a student's satisfaction through informal local discussions.
 - Provide a procedure whereby more serious concerns can be considered directly as complaints where it is apparent that complex and/or multiple issues, or issues of a particularly serious nature, are involved.

2. Definition

- 2.1. UCFB|GIS has adopted the following definition of a student complaint from [The Good Practice Framework for Handling Complaints and Appeals \(December 2022\)](#), produced by the Office of the Independent Adjudicator for Higher Education:

“An expression of dissatisfaction by one or more students about something a provider has done or not done, or about the standard of service provided by or on behalf of the provider.”

- 2.2. A student complaint may be about, for example:
 - Inadequate quality of facilities, learning resources or services provided directly by UCFB|GIS.
 - A service provided by other organisations or contractors on behalf of UCFB|GIS.
 - The way a student has been treated by a member of staff.

3. Scope

- 3.1. This policy applies to all UCFB|GIS students registered on undergraduate and taught postgraduate courses awarded by the University of East London (UEL).
- 3.2. The policy and reflects the [UEL Academic and General Regulations](#).
- 3.3. Students studying for an award at Buckinghamshire New University (BNU), should also refer to this policy. Students that remain dissatisfied at the conclusion of this process can engage with Stage 3- Review which can be found in the [Student Complaints Procedure](#).
- 3.4. Prospective students (i.e., those at the application stage) are able to submit a complaint. A complaint about the Admissions process or service should be made in writing **within 14 calendar days** of receipt of the admissions decision. Please see the UCFB|GIS Admissions Policy for further information.
- 3.5. A student who has recently interrupted, withdrawn, or graduated from studies is entitled to submit a complaint, providing it is received **within one month (UEL) or three months (BNU)** of their last recorded date of attendance, dependent upon the validating partner under which the student is registered. This policy is **not** intended to address specific academic decisions or alleged instances of student misconduct.
 - 3.5.1. This policy is different from an academic appeal which covers decisions regarding progress, assessment, awards, and related processes. Students who disagree with academic decisions must raise an academic appeal under the UCFB|GIS Academic Appeals Policy.
 - 3.5.2. Where a student may report or may be responding to allegations of student misconduct, this will be handled under the appropriate disciplinary policy.
- 3.6. UCFB|GIS reserves the right to reclassify a complaint as an academic appeal according to the nature of the subject matter of the complaint.
- 3.7. For the purpose of the Complaints Policy, the use of the term 'student' shall cover all is deemed to be covered in this policy. Where a complaint is made by a third party on behalf of a student, the use of the term 'student' in this Complaints Policy shall also be deemed to apply to the person making the complaint.
- 3.8. The Resolutions Officer can advise on both UEL and BNU policies.

4. Equality Impact and Reasonable Adjustments

- 4.1. This policy is neutral in terms of equality-related issues.
- 4.2. Students may raise issues which may also be covered by different UCFB|GIS policies. UCFB|GIS have discretion to decide how to progress matters in the best interests of all parties including deciding which matter and procedure

should take precedence or whether interlinked matters can be considered under one or more of its policies.

- 4.3. In the case of a student with additional needs, reasonable adjustments can be made to avoid them being treated less favourably. This may include holding meetings remotely. Any student who wishes to seek reasonable adjustments should discuss their needs with UCFB|GIS and it will seek to refer the student to appropriate support or put in place appropriate adjustments.

5. UCFB|GIS Approach

- 5.1. All UCFB|GIS enrolled students have the right to raise a complaint and to have their complaint taken seriously.
- 5.2. Raising a complaint gives UCFB|GIS permission to investigate facts and to discuss the matter with appropriate people, ensuring this is handled with sensitivity at every stage of the process.
- 5.3. UCFB|GIS encourages students to raise areas of concern or potential opportunities for improvement, however the Resolutions Officer reserves the right to advise students where instances may best be directed to more appropriate feedback mechanisms, such as Module Reviews, Student Representatives, Course Representatives, Student Union Sabbatical Officers or the Student Voice and Student Union Liaison Officer.
- 5.4. If other University procedures are in use at the same time a complaint is submitted, the investigation will continue unless there are good reasons for one of the procedures to be put on hold pending the outcome of the matter.
- 5.5. Evidence submitted as part of one procedure will be deemed to be available to be used in other procedures as appropriate. UCFB|GIS has the right to consider a complaint under another procedure if it is deemed to be more appropriate to do so. Reasons for this will be noted and communicated to the student at the earliest opportunity.
- 5.6. Anonymous complaints will not usually be investigated however, the provision of supporting evidence may help decide if it is appropriate for the matter to be taken forward.
- 5.7. A written record will be kept of all meetings and telephone calls and retained in a confidential file.
- 5.8. UCFB|GIS will be as transparent as possible in responding to a complaint. Requests for access to certain documents will be considered within the boundaries of the European General Data Protection Regulation (GDPR) and the UCFB|GIS Confidentiality – Student Wellbeing Guidance Statement.
- 5.9. Any decision taken at any stage of dealing with a complaint should be reasonable and should be based upon the evidence available to the member of staff making the decision.
- 5.10. Every effort to work within published timescales will be undertaken, however, where the complaint has elements which relate to various aspects

of services provided, each area may have to undertake a separate investigation, which may lead to delays in the investigation being completed. UCFB|GIS will take all reasonable steps to try to ensure that this does not happen, however the Resolutions Officer will issue regular updates to the complainant as to the progress of the case.

- 5.11. UCFB|GIS aim to formally respond to the complainant within the stipulated timescales, however, this may take longer during busier periods, and/or depending on staff availability.
- 5.12. New evidence which is relevant to the original complaint may be submitted as it becomes available however, it should be noted that this may increase the length of time taken to deal with the case.
- 5.13. Malicious or frivolous complaints will be rejected at the earliest stage, and written reasons will be given. Students found to have submitted such a complaint may be subject to disciplinary action.
 - 5.13.1. If it is deemed necessary to terminate consideration of the complaint, the student will receive written confirmation of this decision. The student may appeal against the decision **within one calendar month (UEL) or three months (BNU)**, dependent upon the validating partner under which the student is registered.
- 5.14. If legal action is pending, UCFB|GIS reserves the right to suspend internal investigations until the legal action is resolved.

6. Complaints made by a third party on behalf of a student

- 6.1. Students are encouraged to pursue any complaint themselves, however in some instances a complaint can be pursued by a third party, such as a parent or guardian. In such cases, the student must provide written confirmation, including their full name and student ID number, giving their consent for a named person to act on their behalf prior to a complaint being accepted.
- 6.2. In such cases, the complainant will be copied into all correspondence from UCFB|GIS.
- 6.3. UCFB|GIS will not accept any responsibility for the actions of the third party.
- 6.4. UCFB|GIS will accept a withdrawal of permission at a later date, if made in writing by the student.
- 6.5. UCFB|GIS will not commence investigation of any complaint raised by a third party prior to receipt of consent from the student.

7. Group Complaints

- 7.1. A group of students can make a collective complaint. However, the following criteria must be met before the complaint will be accepted:
- One member of the group must be identified as the main contact who will correspond on the group's behalf, attend meetings, and receive communication from UCFB|GIS regarding the complaint.
 - Each member of the group must submit their consent in writing and agree to abide by these regulations. They must include their full name and Student ID number and details as to why they were personally affected by the matter of the complaint. UCFB|GIS will work on the assumption that any discussion or agreement with the main contact will be with the consent of the rest of the group and that no-one providing written authorisation has been coerced into agreeing to the complaint or outcomes.
 - If this option is taken, the main contact must accept or reject the outcome on behalf of the whole group.
- 7.2. An individual student that has entered into a group complaint cannot then submit a complaint referring to the same issued raised in the group complaint
- 7.3. Where a group of students submit more than one complaint relating to the same substantive issue, UCFB|GIS may choose to treat those complaints as a single, group complaint.

8. Complaints made against staff

- 8.1. Information submitted will remain confidential, as far as this is consistent with other party's right to know details of any allegations that are made against them. Where a complaint names specific members of staff, those staff will be entitled to see the written complaint.
- 8.2. Generally, complaints will be treated as being against UCFB|GIS and not against individual members of staff. Accordingly, any resolution will usually be offered by UCFB|GIS rather than by an individual. However, where a complaint indicates inappropriate conduct, the complaint will be immediately referred to the Formal Stage and an Investigating Officer (Dean or Head of Department in which the staff member operates in such cases) should consider whether the case falls under the relevant UCFB|GIS Human Resources Policies. In that case, the matter will be referred to Human Resources and the complaint will operate in parallel with this Complaints Procedure. The relevant Dean or Head of Department must liaise with Human Resources before attempting to take any action pursuant to the disciplinary procedures.
- 8.3. Where a complaint has been raised against a member of staff and has been upheld, the student bringing the complaint will be advised of this. However, it may not be appropriate to share specific details affecting individual staff

members particularly where disciplinary action is being taken. Students may be advised that appropriate action is being taken but not necessarily be provided with any further detail.

9. Complaints made by students under the age of 18

- 9.1. If a complaint is made by a student who is under the age of 18, UCFB|GIS will notify the parent/s or guardian/s of the student in writing and keep them informed of the progress of the complaint, unless it is the student's express wish that this should not be done. UCFB|GIS will permit the parent/s or guardian/s of the students to act on the student's behalf during the process, provided the student has confirmed agreement in writing beforehand.

10. Complaints Process

10.1. Introduction

- 10.1.1. The complaints process is divided into two parts;
- Stage 1: Early Resolution; which emphasises resolution at the 'local' point where the complaint arose.
 - Stage 2: Formal Complaint: which involves the appointment of an Investigating Officer, not previously involved in the case, to investigate the complaint and explore potential resolution.
- 10.1.2. Staff and students are expected to take every opportunity to resolve a complaint before escalating the matter to the next stage of the process. Staff are encouraged to take immediate action wherever possible. Each stage of the process should be exhausted before moving on to the next stage, however, matters of a profoundly serious or sensitive nature may be escalated to Stage 2 where appropriate. A student wishing to escalate a complaint to Stage 2 should complete and submit the appropriate form to Resolutions@ucfb.ac.uk.

10.2. Stage 1: Early Resolution

- 10.2.1. Complaints should normally be raised **within one calendar month (UEL) or three months (BNU)**, of the event which has given rise to the complaint. In exceptional circumstances, complaints may be received outside of this time at the discretion of UCFB|GIS, dependent on the nature and seriousness of the case, and whether it is reasonable to investigate the events.
- 10.2.2. Where a complaint cannot be accepted because it has been received outside of the stated time limits and is not considered exceptional, the student will be issued with a letter to explain that this was received out of time and could therefore not be accepted. This is called a Completion of Procedures letter.

- 10.2.3. Complaints will be dealt with initially at the level at which the event leading to the complaint occurred. This could be either a module or course leader, or a staff member within the relevant service department, for example. Wherever possible the student should address the complaint to the member of staff most directly involved in the event leading to the complaint, in order to give that person the opportunity to address the concerns.
- 10.2.4. In order to raise a complaint, the student should complete the Stage 1 (Early Resolution) Complaint form, detailing the key points of the complaint, what actions have been attempted to resolve the matter and details as to how the student would like to see the complaint resolved. This should then be issued to the Resolutions Officer via Resolutions@ucfb.ac.uk for consideration.
- 10.2.5. The Resolutions Officer will consider the complaint and, where this can be accepted, will assign a member of staff to address the complaint. The member of staff receiving the complaint will make every effort to resolve the complaint simply and quickly. Where appropriate, the student will be invited to a meeting to discuss the matter.
- 10.2.6. **Within one calendar month**, the member of staff responsible for reviewing the complaint will provide a completed Stage 1 (Early Resolution) Complaint form to the Resolutions Officer who will issue an outcome to the student thereafter.
- 10.2.7. The completed Stage 1 (Early Resolution) Complaint form will either:
- Detail the agreed resolution; or
 - Detail why a resolution could not be found at Stage 1
- 10.2.8. Complaints will be dealt with in a timely fashion however UCFB|GIS may need to extend the timescales for response if, for example, it becomes difficult to schedule meetings with the relevant individuals or if matters are complex and require additional time to fully investigate. These examples are not exhaustive, and UCFB|GIS will inform students should it become necessary to extend this timeframe.
- 10.2.9. Members of staff responsible for overseeing Stage 1 (Early Resolution) complaints should ensure that all communication and documentation relevant to the initial investigation and outcome is issued to the Resolutions Officer for record keeping.
- 10.3. **Stage 2: Formal Complaint**
- 10.3.1. If the response to the Stage 1 complaint is not considered satisfactory, the student may commence Stage 2 of the complaints process by completing the Stage 2 Formal Complaint form and submitting it to Resolutions@ucfb.ac.uk. The form should be

submitted alongside the Stage 1 (Early Resolution) Complaint form **within one calendar month** of receipt of the Stage 1 outcome.

- 10.3.2. The Stage 2 Formal Complaint form should include:
- The grounds for complaint (including specific details where facilities, learning resources or services may not have been to the student's satisfaction);
 - Details as to what steps have been taken at early resolution to try to resolve the matter;
 - Why the outcome of Stage 1 was not deemed satisfactory;
 - The form of resolution or redress sought; and
 - Where a resolution at Stage 1 has not been sought, the reasons for seeking to progress the complaint directly to Stage 2.
- 10.3.3. Upon receipt of the completed Stage 1 and Stage 2 Complaint forms, the Resolutions Officer will acknowledge receipt of the form **within 5 working days**, in addition to undertaking an evaluation of the complaint to ensure the following:
- Whether the complaint has been submitted under the correct procedure;
 - That the form has been correctly and adequately completed;
 - That the complaint has been submitted in time; and
 - That the form of resolution sought is achievable, reasonable, and proportionate.
- 10.3.4. Having considered the above, the Resolutions Officer will determine whether the complaint can be accepted. The Resolutions Officer may request that the student provides additional or further information before determining whether a complaint can be accepted.
- 10.3.5. Once a complaint has been accepted, the Resolutions Officer will allocate an Investigating Officer who has had no previous involvement in the subject matter of the complaint. An Investigating Officer will usually be an Assistant Dean, Service Manager, or other similar, senior employee.
- 10.3.6. The Investigating Officer will contact the student **within 5 working days of appointment** to arrange an initial meeting to discuss the complaint and any potential resolution.
- 10.3.7. In certain circumstances, in order to facilitate the investigation, the Investigating Officer has the discretion to hold a meeting with other relevant parties, including any employee or student involved in the case.
- 10.3.8. The Investigating Officer will undertake a thorough investigation

into the matters raised in the complaint and, **within 20 working days of appointment**, will compile a report setting out their findings and recommendations. This will be provided to the Resolutions Officer. The report should detail:

- Whether the complaint is upheld (fully or partially), or is not upheld, with detailed reasons given to support the decision.
- A response to each individual point raised by the complainant.
- The steps taken to investigate the complaint, including any meetings held (either in person or by telephone) as well as all evidence considered as part of the investigation.
- Any redress and/or remedial action which is being offered and recommendations for improvement in practice or regulations (where appropriate)

10.3.9. In limited circumstances where the Investigating Officer is unable to come to a conclusion on the outcome, the matter may be referred to a Complaints Hearing.

10.3.10. The Resolutions Officer will issue the Investigating Officer Report and outcome letter to the complainant **within 5 working days** of receipt of the report. The outcome letter will include recommendations for resolution, which may include one or more of the following (this list is not exhaustive):

- That there is no case to answer and the matter should not be pursued; or that it should be pursued under another procedure.
- That the complaint appears to have substance and an offer of resolution should be issued.
- That the matter is a disciplinary one, in which case, the matter should be referred under the relevant disciplinary procedure and the complaints procedure is discontinued. In such cases, the complaint will be updated, but the complainant may not learn the outcome of the disciplinary procedure, due to data protection legislation.
- That the complaint is frivolous, malicious, or vexatious in which case, the complaint will not be pursued, and a disciplinary allegation may be made against the student.

10.3.11. The outcome letter will also include information regarding the next stage of the complaints process. The student will be requested to confirm if they accept the proposed resolution and any related form of redress **within 10 calendar days** of receipt of the outcome.

10.3.12. The student may confirm in writing that they wish to accept the recommendations and the redress, and, in this case, the formal complaints procedure is closed. Alternatively, the student may

confirm in writing that they wish to decline to accept the proposed resolution and the redress.

- 10.3.13. If a student does not respond **within 10 calendar days** of receipt of the outcome, a Completion of Procedures letter will be issued which states that the matter is closed, and that the complainant has not completed the procedures in full.

10.4. **Complaints Hearing**

- 10.4.1. Should a Complaints Hearing be appropriate, it will be chaired by a Dean external to the campus which the student is enrolled (in the case of a complaint being about an academic matter). Where the complaint is regarding non-academic matters, a Head of Service from another department will chair the Panel.
- 10.4.2. A Panel, consisting of the Chair and two other members of academic or support staff drawn from the campus or service departments unrelated to the complaint.
- 10.4.3. The Resolutions Officer will act as Secretary to the Panel.
- 10.4.4. The Resolutions Officer will also consider UEL representation at such hearings.
- 10.4.5. The academic or service department that is subject of the complaint will support the arrangements for the Panel.
- 10.4.6. The student may be accompanied by a friend or representative at this meeting and the academic or service department may be represented by up to two members. If the complaint relates to the actions of an individual member of staff, that individual has the right to attend and be represented.
- 10.4.7. The Complaints Hearing shall be convened **within 20 working days of referral** by the Resolutions Officer.
- 10.4.8. The Resolutions Officer will keep all parties informed of progress and will explain reasons for any necessary extension of the timescale for response, for example, if an adjournment in the proceedings is necessary.
- 10.4.9. The outcome of the Complaints Hearing will be communicated to the Student and the academic or service department of which the complaint relates **within 10 working days** following the hearing.

10.5. **Stage 3: Request for Review**

- 10.5.1. Students studying for an award at Buckinghamshire New University (BNU), that remain dissatisfied at the conclusion of this process can engage with Stage 3 - Review which can be found in the [Student Complaints Procedure](#). This must be submitted **within 10 working days** from the date of the notification of the Stage 2 outcome.

- 10.5.2. For students registered on courses awarded by the University of East London (UEL), if the response issued at the conclusion of Stage 2 is not considered satisfactory, they may request a review. This must be submitted in writing **within 10 calendar days** from the date of the notification of the Stage 2 outcome.
- 10.5.3. A request for review can only be considered in the following circumstances:
- There has been a material procedural irregularity which has demonstrably affected the outcome of the claim to the detriment of the student; or
 - There is new evidence that would have significantly affected the outcome and could not reasonably have been made available when the complaint was made; or
 - There is evidence that all the relevant information was not considered at Stage 2; or
 - The decision is deemed perverse given the facts of the case; or
 - The complaint was upheld but the proposed remedy was inappropriate
- 10.5.4. Should the circumstances of the complaint meet the criteria outlined in 10.5.3, a request for review should be addressed to the UEL Complaints & Appeals team via complaints@uel.ac.uk, providing:
- Details as to why the Stage 2 outcome is not satisfactory.
 - Any additional supporting evidence
- 10.5.5. If the UEL Complaints & Appeals team determines that there are valid grounds for review, the University Secretary shall review the case. Following a review, the University Secretary may either:
- Uphold the outcome of the Formal Complaint; or
 - Refer the case back to UCFB|GIS with recommendations for reconsideration.
- 10.5.6. A decision will be made **within one calendar month** of receipt of the request for review.

11. Office of the Independent Adjudicator for Higher Education (OIA)

- 11.1. In the event that the complainant is not satisfied with the final outcome after the internal procedures have been completed, they may lodge a request for external review directly with the Office of the Independent Adjudicator for Higher Education (OIA).

11.2. Any request for review to the OIA must be submitted **within 12 months** of the Completion of Procedures letter being received by the student. The OIA will not usually review complaints which have not been considered by UCFB|GIS.

11.3. The OIA may be contacted via:

Tel: 0118 959 9813

Email: enquiries@oiahe.org

Website: www.oiahe.org.uk/students/

Postal address: Office of the Independent Adjudicator, Second Floor, Abbey Gate, 57-75 Kings Road, Reading, RG1 3AB

12. Reporting and Monitoring

12.1. Records will be maintained of all complaints that are submitted for monitoring and improvement. An annual report will be prepared for the Education and Student Experience Committee and Academic Board. This will detail any potential areas for enhancement or lessons learned. The annual report will also be shared with the relevant validating body,

13. Behaviour during the Complaints Process

13.1. UCFB|GIS has zero tolerance towards those whose behaviour is considered to be unacceptable and will take action in this respect. Unacceptable behaviour includes communicating with UCFB|GIS in a malicious, vexatious, or aggressive manner for example:

- Making frivolous claims, or multiple claims regarding the same subject
- Acting in a threatening manner either verbally, through an e-mail or by letter
- Making claims that are knowingly false or unfounded.

13.2. If the behaviour of a student is unacceptable, UCFB|GIS will usually tell the student why their behaviour is considered as such and will allow an opportunity to amend it. If the behaviour continues, UCFB|GIS will enact the UEL Non-Academic Misconduct policy.

14. Updates

14.1. This Policy will be reviewed and updated by UCFB|GIS on a regular basis as directed by the Policy review schedule.