

19. STUDENT COMPLAINTS PROCEDURE

19.1 Introduction

- 19.1.1 The University is committed to providing a high quality educational and student experience. However, the University recognises that on occasion, students may wish to express concern or dissatisfaction with aspects of academic or administrative services. This procedure reflects the commitment of the University to deal with issues at the earliest possible opportunity and, where necessary, to conduct investigations which are thorough, fair and ensure that that decisions are made on the basis of the facts and the available evidence, of each individual case.
- 19.1.2 This procedure applies to all registered students and recent alumni of the University. Students registered on collaborative provision will be advised within their student handbook which institution's complaints procedure to follow, in accordance with the formal agreement which governs the provision.
- 19.1.3 This procedure is aligned to Chapter B9: Academic Appeals and Student Complaints, UK Quality Code (QAA) and the Good Practice Framework: Handling Academic Appeals and Student Complaints (Office of the Independent Adjudicator for Higher Education).
- 19.1.4 Where a student making a complaint believes that they should receive reasonable adjustments to the procedures on the grounds of disability, this should be clearly stated in the submission. This would include the reason for requesting the adjustment and any suggestions of what this may mean, for example an alternative format to a hearing or an extended deadline.
- 19.1.5 Students are strongly encouraged to seek advice and support should they consider or make a complaint, such as from the Imperial College Union, Disability Advisory Service or personal tutor, as appropriate.
- 19.1.6 This process should not be used to raise an appeal against the outcome of assessment, a Board of Examiners or mitigating circumstances decision ([see Academic Appeals procedure](#)), nor to make an allegation of misbehaviour against any member of the University. Advice of the correct procedure in these cases can be sought from Registry or Imperial College Union.

19.2 Principles of the Complaints Procedure

- 19.2.1 For the purposes of this procedure, a Complaint is defined as "an expression of dissatisfaction by one or more students about an action or lack of action by the University, or about a standard of service provided by or on behalf of the University."
- 19.2.2 The University's position is that no student should be discriminated against or in any way penalised for raising a complaint at any level of the *Student Complaints Procedure*.
- 19.2.3 Every reasonable effort will be made to deal promptly and efficiently with all complaints, to investigate them thoroughly and objectively, and to seek to solve them satisfactorily. Complaints will be dealt with positively and constructively. If a complaint is upheld, the University will seek to provide an appropriate response and will correct any mistakes or misunderstandings and will take other action as appropriate. If a complaint is not upheld then the reasons for that decision will be given.

- 19.2.4 All complaints will be dealt with in confidence with the proviso that enquiries will have to be made to investigate the matters that are the subject of the complaint. Also, an individual against whom a complaint has been made has the right to be supplied with a copy of the complaint and the opportunity to respond.
- 19.2.5 The effectiveness of any complaints procedure depends on the University being able to collect appropriate information from the parties involved in order to investigate the matter properly. For this reason, complaints made anonymously will not normally be considered.
- 19.2.6 Where a complaint is submitted by more than one student, the group will be asked to nominate a group representative, with whom the University will communicate throughout the process. It is the responsibility of this representative to keep the remainder of the group informed of the progress of the complaint. At the end of each stage of these procedures, all students in the group will be notified of the outcome of their complaint individually.
- 19.2.7 The investigation into the complaint will be a fact-finding process to establish the relevant evidence and circumstances of the case. The investigation will only focus on the nature of the complaint. The process may involve reviewing supporting records/documents as well as interviewing staff and/or other students. A report of the investigation, which will contain relevant factual information, copies of statements and all other documentary evidence will be produced at the end of the investigation.
- 19.2.8 The time limits set out in the Procedure will normally be followed. However, where for good reason this is not possible, the student will be kept informed of the progress, and, where possible, provided with a revised timescale.
- 19.2.9 Where a formal complaint is upheld any remedial action will be taken and the complainant will be informed formally in writing within 10 working days of the action to be taken.
- 19.2.10 The University will monitor and evaluate the issues raised through the complaints procedure in order that the causes of complaints can be identified and addressed, and that improvements can be made.
- 19.2.11 The University will treat all complaints seriously and will deal with them without recrimination. When complaints are submitted, student complainants and University staff should act reasonably and fairly towards each other and respectfully adhere to this Procedure. The University recognises the rights of individuals who may be wrongly accused in the circumstances of a complaint. Where it is found that a student has raised a frivolous or vexatious complaint or used false information to support their complaint, the University may instigate its Student Disciplinary Procedure in respect of the student's conduct.
- 19.2.12 A complaint cannot normally be raised on behalf of a student by a third party. In exceptional circumstances, applications by a third party to raise a complaint on behalf of a student may be considered at the discretion of the Academic Registrar.
- 19.2.13 Where the circumstances of the student complaint are felt to be exceptional, the University may amend the conduct of the Student Complaints Procedure, where it considers that amendment will be beneficial to the student. The reasons for any amendment to the procedure as set out in this document will be communicated to the student and all respondents to the complaint. The

amendments will be recorded in the outcome letter at the relevant stage and, where issued, in the Completion of Procedures letter.

19.3 Stages of the Procedure

- 19.3.1 In line with the reconditions of the Good Practice Framework (OIA, Sept 2015), there are three stages in the *Student Complaints Procedure*:-
- (a) Stage One - Local Resolution
 - (b) Stage Two – Formal Stage
 - (c) Stage Three – Review

19.4 Stage One – Local Resolution

- 19.4.1 The first step is for a student to raise awareness of the problem, either by email or face-to-face, and discuss it directly with the relevant staff in the academic department or support service concerned. Students should raise any issue at the earliest possible opportunity and, wherever possible, within 15 working days of the issue arising. Matters dealt with locally at an early stage have a better chance of being resolved quickly and effectively and without a student having to escalate their complaint to the formal stages of the process.
- 19.4.2 Where complaints have been raised locally, the student should normally be provided with a response within 10 working days to report how the issue has been considered or to advise the student of how it will be resolved. This response will be copied to a complaints specific email address (student.complaints@imperial.ac.uk) to ensure that a record of the response is kept and it must inform the student of the next step(s) and timeframes for doing so.
- 19.4.3 Where the local resolution stage has been completed and a student remains dissatisfied with the outcome, they can escalate their complaint to Stage 2.
- 19.4.4 Where a student wishes to raise a substantial complaint, he or she may submit their complaint directly to the formal stage (Stage 2) as outlined in section 5.1.

19.5 Stage Two – Formal Stage

- 19.5.1 If the complaint has not been resolved to the satisfaction of the student through the local stage, or if a student wishes to raise a substantial complaint, a formal complaint should be submitted. This should be made on the formal *Student Complaint Submission Form*, which should be submitted to the Registry within 10 working days following the outcome from the local stage or, if appropriate under section 4.4, after the incident of concern.
- 19.5.2 The student will be required to provide details of the nature of their complaint on the formal complaint form, along with supporting documentary evidence. The student should also specify their desired outcome from this procedure. If the nature of the complaint is considered by the student to be highly sensitive, they may submit details of the complaint marked “*Sensitive*” and for the consideration of the complaint investigator only. In such circumstances, the student must be aware that in order for the complaint to be considered fairly, the individual against whom a complaint has been made will be supplied with a copy of the complaint as set out in paragraph 19.2.4 above, and these

details will also need to be taken into account by the responsible authority as set out in paragraph 19.5.5 below in order for a decision to be made.

- 19.5.3 Upon receipt of a formal complaint, an initial evaluation will be undertaken to check that the complaint has been submitted under the correct procedures and within the deadline. If the complaint has been submitted directly to the formal stage (see paragraphs 19.4.4 and 19.5.1) and it is considered that it could be reviewed at the local stage first, it will be referred back to the student for this to be done. If the Academic Registrar or nominee does not consider that it is appropriate for the matter to be dealt with under the *Student Complaints procedure*, the student will be informed accordingly and, where appropriate, advised of any alternative procedures available to them. Students would also be provided with additional guidance of the timeframes and support available to them through any alternative procedures.
- 19.5.4 Complaints received after the deadline will normally be rejected and the student advised accordingly. However, the University may choose to investigate a complaint submitted after the deadline where the student is able to demonstrate valid reasons for being unable to submit the complaint within the appropriate timeframes. Where a complaint is rejected as late, this will complete the procedures of the University and a "Completion of Procedures letter" will be provided to the student explaining the decision and advising them of the Office of the Independent Adjudicator for Higher Education (OIA) complaint scheme.
- 19.5.5 The University will identify the responsible authority to deal with the complaint as follows:-
- (a) **Academic matters:** The Head of Department (for undergraduate medicine students this is the Head of Undergraduate Medicine) or Dean of the Faculty.
 - (b) **Students' Union matters:** the President of the Imperial College Union.
 - (c) **University-managed Residential Accommodation:** the Head of Residences.
 - (d) **Catering:** the Head of Catering
 - (e) **All other administrative matters:** the Academic Registrar.
- Any complaint that does not appear to obviously fall into the categories above should be referred to the Academic Registrar in the first instance.
- 19.5.6 Where the complaint is against one of the people named in a) – d) above, the Academic Registrar will nominate a responsible authority for dealing with the complaint. If the complaint is regarding Academic Registrar, the Provost will nominate a responsible authority for dealing with the complaint.
- 19.5.7 Where the individual named in a) – e) above has had a previous involvement in the complaint, the Academic Registrar will identify an alternative member of staff to deal with the complaint.
- 19.5.8 The staff member dealing with the complaint will confirm what is being investigated. Where the student's expectations appear to go beyond what the

University can reasonably provide, the student should be advised of this in writing.

- 19.5.9 The responsible authority considering the complaint may conduct an investigation themselves or appoint another member of staff to investigate the complaint. The responsible authority or their nominee will conduct a review of the supporting evidence provided by the student, and may talk to the key people involved and collate additional items of evidence. A report will be produced which outlines the process followed, the evidence considered, the conclusions drawn and any recommendations which emerge from the investigation. Appended to the report will be the evidence that has been considered in coming to the decision regarding the complaint.
- 19.5.10 The student will be formally advised of the outcome of the complaint, normally within 20 working days of the complaint being raised at the second stage and provided with a clear explanation of the reasons for each decision, a copy of the documentation and evidence considered in making the decision(s) and, where a complaint has been upheld, explaining how and when any remedy will be implemented. The student should also be provided with information on their right to proceed to the review stage (Stage 3, see paragraph 19.6). The student should also be informed of the grounds and timeframes associated with this stage. Where it is not possible to advise the student of the outcome within the normal timescales, the student will be advised of the delay and provided with a revised timescale.
- 19.5.11 If the student does not take the complaint to the review stage within the specified timescale (see 6.1), the University will close the complaint. The University, through the Registry, will only issue a Completion of Procedures letter at this stage if the student specifically requests one. This request should be made within six weeks of the notification of the outcome of the formal stage of the complaint. However, the letter will make clear that the student has not exhausted the University's internal complaints procedures.

19.6 Stage 3 – Review

- 19.6.1 If the student is dissatisfied with the outcome from the formal stage (Stage 2), they can request a review. This must be done formally and in writing in a letter to the University Secretary within 10 working days of receipt of the formal response from Stage 2. The request for a review can be made on the following grounds:-
- (a) that there is new material supporting evidence which, for valid reasons, the student was unable to provide during the formal stage of the complaint;
 - (b) that there has been material procedural irregularity in the conduct of the complaints procedure; and
 - (c) That the outcome of the formal stage was unreasonable.
- 19.6.2 The Student must include details of why they remain dissatisfied and what resolution they are seeking and should include any relevant evidence which they wish to be taken into consideration in their request for a review.
- 19.6.3 The University Secretary (or nominee) will evaluate the request for the review to ensure that it falls within the grounds for review set out in paragraph 19.6.1 of this procedure. Upon completion of this evaluation, the University Secretary

(or nominee) will acknowledge the request for review in writing within 5 working days of receipt. If the decision is not to proceed, an explanation will be provided to the student and a Completion of Procedures letter will be issued.

- 19.6.4 If the decision is to proceed with the review, the University Secretary (or nominee) will establish a Panel to meet the student, any individuals named in the complaint, and the responsible authority as set out in paragraph 19.5.5 above before concluding the review of the complaint. The Panel will be drawn from a designated list of Complaints Review members, which is approved annually by Senate, and will be supported by a member of the Central Secretariat staff. A record should be kept of any such meetings. A student may be accompanied by a 'friend' for moral support but the 'friend' may not be a solicitor or barrister acting in a professional capacity. For the purposes of this procedure, a "friend" is defined as either; a registered student of Imperial College London, an officer of the Students' Union, an advisor from the Students' Union or a current member of staff at the University. With agreement from the Chair of the Panel, the "friend" may speak on behalf of the student.
- 19.6.5 The Central Secretariat will normally provide a final written response to the student within 25 working days following receipt of the request for a review of the complaint. This response will give a clear explanation of their findings and, where there were proven grounds for review, an indication of how and when any remedy will be implemented. The student will also be issued with a Completion of Procedures letter, which will indicate that they have completed the University's internal complaints procedure and provide information on their right to direct their complaint to the Office of the Independent Adjudicator (OIA) and of the timescales for them to do this should they remain dissatisfied with the outcome of the complaint.

19.7 Record keeping

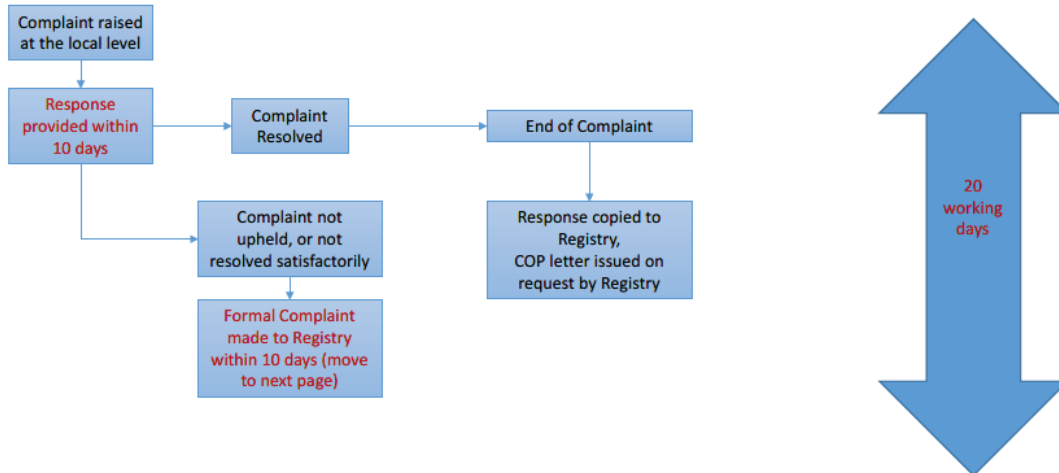
- 19.7.1 A confidential record will be kept of the complaint and of the outcome of the case in order to identify enhancements to the provision of services at the University.
- 19.7.2 The full complaint file will be kept in line with the University retention timescales.

19.8 Annual Report

- 19.8.1 The Registry Quality Assurance Team will prepare an annual report which will inform Senate of the number, nature and outcomes of student complaints during an academic session. The report will also record any corrective action taken and identify any themes emerging from student complaints and make recommendations for any enhancements to the *Student Complaints Procedure*.

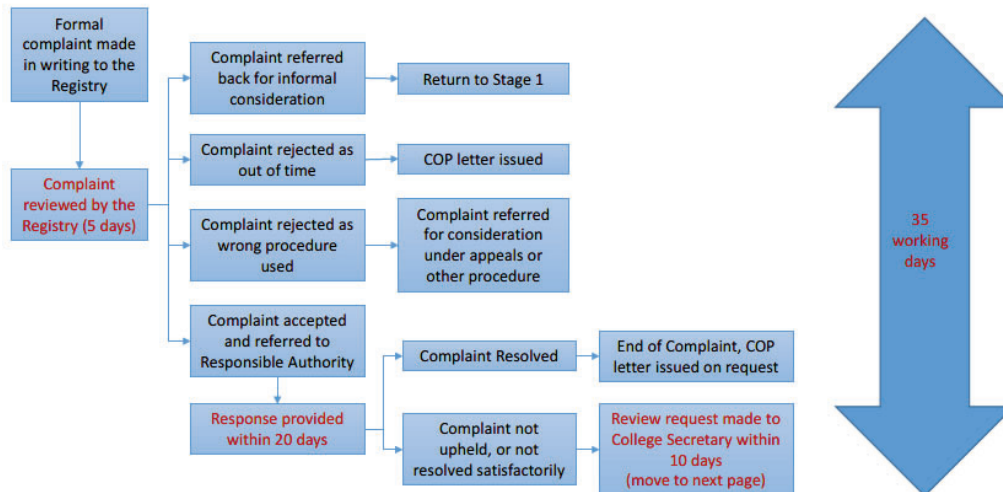
Student Complaints Procedure timeline

Stage 1 - Local



Student Complaints Procedure timeline

Stage 2 - Formal



Student Complaints Procedure timeline

Stage 3 - Review

