



Comments, Suggestions and Complaints Policy

Version:	1
New or Replacement:	Replacement
Approved by:	James Taylor, Deputy Principal – Curriculum & Quality
Date approved:	September 2022
Effective date:	September 2022 to September 2025
Author:	Chris Nixon, Director – Student Services & Safeguarding James Taylor, Deputy Principal – Curriculum & Quality
Responsible Committee:	SLT
Corporation Committee (if applicable):	Curriculum & Quality
Date of next review:	June 2025
Equality Impact Assessment Date:	N/A
Lead responsibility:	Deputy Principal – Curriculum & Quality
Policy Category:	Quality

1. Purpose

- 1.1. West London College aims to become renowned for achieving a high level of customer satisfaction and is committed to continually innovating and improving services for all its customers.
- 1.2. The College recognises the value of customer feedback and seeks out comments and suggestions that give insight into the customer experience and so inform service design and assist in achieving its goal of continuous improvement.
- 1.3. Where a customer feels that the service does not meet their expectations, there are customer-friendly processes for making a complaint. In recognising the potential to turn complainants into advocates, the College places great importance on complaint resolution. All employees are encouraged to take responsibility for resolving all informal complaints immediately to the satisfaction of the complainant. Where a complaint becomes formal, this will be resolved efficiently and within the specified time scales. Should a complainant not be satisfied with the resolution proposed, they have a right to appeal.

2. Scope

- 2.1. This policy covers comments, suggestions and complaints by all West London College customers. This includes learners on college-based further and higher education programmes as well as apprenticeships, internships and all other programmes.

3. Overarching Principle(s)

- 3.1. A comment/suggestion is an idea relating to a possible improvement in the customer experience. A complaint is any expression of dissatisfaction about action, or lack of action, or about the standard of service provided by the College or on our behalf.
- 3.2. All staff are responsible for ensuring that they are aware of and follow all relevant policies and procedures. Managers are responsible for investigating and resolving complaints according to the timescales set out in the complaints procedure.
- 3.3. The College's Quality Department is responsible for the central overview of complaints and for monitoring compliance with standards. This is administered by the Quality Department, under leadership of Deputy Principal Curriculum and Quality.
- 3.4. The Deputy Principal Curriculum and Quality has oversight of comments, suggestions and complaints, monitors these for emerging themes and learning points and reports to the Senior Leadership Team and Corporation on key trends.
- 3.5. The purpose of the policy is to capture comments, suggestions and complaints in a consistent format to ensure that complaints are resolved quickly and satisfactorily and to enable the college to monitor customer satisfaction and make continuous improvements.

4. Complaints Process

This policy has been developed to ensure that complaints are listened to and dealt with in a timely, sensitive and appropriate manner.

There are three strands of complaints:

- Informal customer complaints

- Formal customer complaints
- Appeals

4.1. *Informal Customer Complaints*

Most complaints can be resolved informally by discussing the issue with the person directly involved and taking immediate action to rectify any problem. If the complaint cannot be resolved at this stage, it will need to be progressed to the formal stage.

All informal complaints by learners should be logged on ProMonitor within the Learner Comments section (*Comment Type - Complaints*). Informal complaints should be resolved locally in the first instance.

Before sending a formal written complaint learners are encouraged to discuss issues with their teacher, trainer, assessor or a student advisor. Any member of staff receiving a verbal complaint should attempt to resolve this informally and/or with reference with a relevant manager.

4.2. *Formal Customer Complaints*

If informal discussions do not resolve the problem, the complainant is asked to email details of their complaint and send it to comments@wlc.ac.uk.

In formulating the complaint, the complainant can be helped and accompanied by another student of the College, a member of the Students' Union or a member of staff. If assistance is sought, this should be made clear for recording purposes. This form will be logged, allocated to the relevant manager and monitored for resolution by the Quality Department to ensure compliance of resolution in a timely fashion.

If the formal complaint is received by a member of staff, they will pass the complaint to comments@wlc.ac.uk to ensure that it is logged and acknowledged within five working days.

In accordance with Data Protection guidelines the College will obtain express consent when investigating an issue raised by a third party on behalf of another person affected by an issue. The College will seek consent from the learner whom the complaint concerns. Should we not receive this consent within five working days we will consider the matter closed. Where a parent or carer of a student under 18 raises a complaint on behalf of that student, consent is assumed.

The College will only investigate complaints that have been notified within three months of an incident taking place. Complaints which fall outside of this time period will not be dealt with unless they refer to a safeguarding concern.

On receipt of a formal complaint, the Administration Department will acknowledge the complaint within five working days and identify an appropriate manager to investigate. Complaints will be dealt with at a local level by a relevant designated manager overseen by the Quality Department.

All complaints, whether formal or informal, will be recognised and dealt with sympathetically and constructively. Confidentiality will be maintained at all times within the Quality Department, Administration Department and the appointed manager. No complainant will be disadvantaged, discriminated against or victimised as a result of making a complaint.

The complainant will be kept informed about the progress of their complaint regularly. An outcome of the investigation and any resolution to the complaint should be sent in writing to the complainant within 15 working days of receipt of the original written complaint and the Quality Department should be copied into all correspondence.

If it becomes necessary to invoke the College's formal disciplinary procedures at any stage, the time-scales set by this policy/process will be followed and the complainant will be informed.

All formal complaints are aimed to be resolved within 15 working days of receipt of the original written complaint. Anonymous complaints will be recorded, but not investigated unless they are considered "high-risk" complaints in line with definitions under Whistleblowing.

If the investigating manager is unlikely to resolve the complaint within 15 working days of the acknowledgement, the complainant will be informed of progress together with expected timescales for resolution.

If the complaint is concerning a disability-related issue, the investigating manager may refer the matter to an external consultancy to ascertain the reasonableness of the complaint. This may extend the duration of the investigation. The complaint must be thoroughly and objectively investigated within the shortest period to determine if the complaint is well-founded and, if so, to work towards a mutually acceptable resolution.

Complaints about members of the Senior Leadership Team will be referred to a member of the Executive. Complaints about members of the Executive, Principal and/or CEO will be passed to the Governors for investigation and resolution.

Any complaints about a qualification, must go through the college's complaint process prior to any escalation to an awarding organisation.

A complaint regarding the response to a Freedom of Information request is dealt with by the Data Protection Officer.

In the case of a complaint against a member of staff, and depending on the seriousness of the complaint, i.e. the complaint falls under other College policies such as the 'Grievance Policy', 'Disciplinary Staff Policy', etc., the complaint may be referred directly to the Human Resources Department for consideration. In this case, the complainant will be contacted in writing by Human Resources. In the case of a complaint involving staff misconduct in relation to students, the complaint will be passed to the Designated Safeguarding Lead who will inform the Executive Director: People & Organisational Development and complete a formal investigation, notifying the complainant directly.

Complaints must be held for a minimum of 3 years

Note: Regarding all points raised above, working days mean Monday to Friday during term-time. Complaints received outside of term time may be subjected to a longer response time due to staff being on annual leave.

5. Appeals

- 5.1. If the complainant is not satisfied with the response from the manager investigating the complaint, the complainant can appeal. The appeal is escalated to Assistant Principal for the relevant College campus to carry out an independent investigation to review and seek a resolution.
- 5.2. An appeal will only be considered on the following grounds:
 - The investigation did not address all the complaint points raised
 - New evidence has been made available that was not available at the time the complaint was submitted
 - The investigation was not conducted in accordance with the procedures set out in the procedure for dealing with a complaint

- 5.3. If the appeal is outside the time limit or is not on the basis of one or more of the grounds stated above, it may not be considered. The appellant will be contacted within five working days to advise if their appeal has been accepted and is being investigated or if it has been rejected.
- 5.4. Appeals must be made within 10 working days of the response to the complaint. The appeal will be acknowledged within five working days.
- 5.5. The Appeal investigator will conduct a review of the original investigation and will consider the procedure undertaken, the integrity, any additional evidence and the outcome provided. The findings of the review will be communicated within 15 working days. If the review is complex and likely to exceed this timescale, the complainant will be kept informed of progress. The possible outcomes are that the appeal will either be upheld, partially upheld or rejected.
- 5.6. If the complainant is not satisfied with the outcome of the appeal, the final recourse is to appeal to the Deputy Principal Curriculum and Quality within seven days of the response to the complaint appeal.
- 5.7. An appeal will only be considered on the following grounds:
- The investigation did not address all of the complaint points raised
 - New evidence has been made available that was not available at the time the complaint was submitted
 - The investigation was not conducted in accordance with the procedures set out in the procedure for dealing with a complaint
- 5.8. If the appeal is outside the time limit or is not on the basis of one or more of the grounds stated above, it may not be considered. The appellant will be contacted within five working days to advise if their appeal has been accepted and is being investigated or if it has been rejected.
- 5.9. The Quality Department will continue to monitor and record the appeal.
- 5.10. If the complainant is not satisfied with how their complaint is handled, they can complain to the Education and Skills Funding Agency (ESFA). The contact must be within three months of the decision. Complaints.ESFA@education.gov.uk
- 5.11. ESFA will acknowledge the complaint within five days.

6. Comments and Suggestions

- 6.1. All comments and suggestions are logged centrally by the Administration Department, along with the actions that have resulted from the comment or suggestion.
- 6.2. Comments and suggestions should be emailed to comments@wlc.ac.uk

7. Independent Review

In those rare cases where the internal complaints procedure has not resolved the matter, and depending on its nature, the following external organisations may review unresolved issues:

- 7.1. *Office of the independent adjudicator (OIA – Higher Education)*

The OIA for Higher Education provides an independent scheme for the review of student complaints or appeals. Students wishing to avail themselves of the opportunity for an independent review by the OIA must submit their application within 3 months of the issue of the Completion of Procedures letter.
www.oia.org.uk

7.2. *Education and Skills Funding Agency (ESFA).*

The ESFA can investigate complaints about quality or management of learning provision, undue delay or non-compliance with published procedures, poor administration by the Provider, equality and diversity issues (except where there is a more appropriate mechanism for dealing with the matter through the court or tribunal or other organisations), health and safety concerns and complaints made by learners following HE courses in FE colleges.

Complaints.ESFA@education.gov.uk

7.3. *National Apprenticeship Agency*

Students on traineeships and apprenticeships.

www.apprenticeships.org.uk

7.4. *Information Commissioner's Office (ICO)*

The ICO can investigate the results of an internal appeal regarding Freedom of Information requests.

<https://ico.org.uk>

Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 (National rate number)

7.5. *Greater London Authority (GLA)*

For adult students on courses funded by the Adult Education Budget of the Greater London Authority

You must contact the GLA within 12 months after the issue happened. Email or post your complaint to the GLA Skills and Employment unit:

aebcomplaints@London.gov.uk

Provider complaints, Skills and Employment unit, Greater London Authority, 169 Union Street, London SE1 0LL.

8. **Related Documents**

8.1. The following related documents are relevant to this policy / procedure:

- Admissions Policy
- Equality and Diversity Policy
- Behaviour Management Policy
- Safeguarding Policy

- Data Protection Policy
- Health and Safety Policy
- Quality Assurance Policy

9. Accountability

- 9.1. The Deputy Principal Curriculum and Quality and Director of Student Services and Safeguarding are responsible for the drafting and implementation of this policy.
- 9.2. They are also responsible for ensuring that this document is regularly reviewed and updated – and are the first contact point for managers seeking advice and guidance about the policy or making enquiries about its interpretation.
- 9.3. All managers are responsible for ensuring that they and their team members follow the requirements set out in this document.
- 9.4. All employees are responsible for adhering to the requirements set out in this document.

10. Equality, Diversity & Inclusion

- 10.1. The College has paid due regard to equality considerations during the preparation and implementation of this Policy.
- 10.2. These considerations included the potential for any differential negative effect on the grounds of age, disability, gender reassignment, pregnancy and maternity, race (including ethnic or national origins, colour or nationality), religion or belief (including lack of belief), sex, sexual orientation, marriage or civil partnership.
- 10.3. The College's judgement is that there is no such negative effect on those grounds and, consequently, no potential breach of the Equality Act 2010.
- 10.4. The operation of this Policy and Procedure will be monitored by the Executive Director of People and Organisational Development in order to establish that no unlawful discrimination is taking place and to identify opportunities for the College to enhance equality of opportunity and fair treatment.

11. Review

- 11.1. This document will be reviewed by September 2025.
- 11.2. The Deputy Principal Curriculum and Quality will undertake this review, taking into account the outcomes of the monitoring process, legislative changes and developments in good practice.
- 11.3. As part of the review, the Deputy Principal Curriculum and Quality will seek and consider the views of the College's employees and, where appropriate, of the recognised trade unions.
- 11.4. The outcome of the review will be reported to the Senior Leadership Team.

12. Policy Category

<p>Category [select ONE only]</p>	<ul style="list-style-type: none"> <input type="checkbox"/> Business Development, Marketing and Subcontracting <input type="checkbox"/> Corporation <input type="checkbox"/> Data Protection <input type="checkbox"/> Equality & Diversity <input type="checkbox"/> Estates / Facilities <input type="checkbox"/> Executive Support, Administration and Reception <input type="checkbox"/> Finance <input type="checkbox"/> Health and Safety <input type="checkbox"/> International <input type="checkbox"/> IT Services <input type="checkbox"/> Management Information Systems <input type="checkbox"/> People and Organisational Development <input checked="" type="checkbox"/> Quality <input type="checkbox"/> Student Services & Safeguarding
<p>Audience [select ALL that apply]</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Governors <input checked="" type="checkbox"/> Learners <input checked="" type="checkbox"/> Partners <input type="checkbox"/> Suppliers