



CITY OF LONDON COLLEGE

A UNIVERSITY SECTOR PREMIER College

Student Complaints Policy

2025/26

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1. Introduction

The City of London College (CLC) is committed to providing high quality services for all learners, employers and the community. To improve the quality of service the College actively seeks feedback from its current and potential customers and makes every effort to address concerns should they arise. The College welcomes feedback from students, employers and members of the public about courses and other matters, services and facilities for which the College is responsible. All formal complaints are fully investigated and the information gained as a result of these investigations will be used in pursuit of corrective action and/or continual improvement. The College aims to respond quickly and positively and to reach an outcome that is satisfactory and fair for all concerned.

This policy sets out the approach of the College to the handling of student complaints. It ensures that all undergraduate students have access to a clear, fair, and timely procedure for raising and resolving complaints related to their academic experience, services, or treatment by the institution. The policy reflects the requirements of the Competition and Markets Authority (CMA), the Office for Students (OfS) and the rules and regulations of its awarding body partner Plymouth Marjon University and forms part of the College's regulatory commitment to treating students as consumers and as partners in the academic community.

The College's aim is to foster a supportive environment in which students can raise concerns without fear of disadvantage, and where complaints are resolved transparently, respectfully, and in accordance with due process.

2. Scope

This policy applies to all undergraduate students and covers complaints related to academic delivery (teaching, supervision, assessment), course administration, enrolment, or access to resources, tuition fees and financial services, conduct of staff or other students, discrimination, harassment, or unfair treatment and any aspect of the student experience where dissatisfaction arises. The policy covers:

- complaints from students about other students, staff or any service provided by the College
- complaints from employers in relation to any service provided by the College (or its subcontractors)
- complaints by members of the public
- complaints in relation to any Health and Safety or Equality duties of the College.

The policy does not cover appeals against academic decisions (e.g. marks or progression), which are handled through a separate Academic Appeals Policy.

3. Principles of the Complaints Process

The College's Complaints process is based on the following principles:

- **Fairness:** All students are treated equitably and without prejudice.
- **Accessibility:** The policy and process are easy to access, written in plain English, and available in alternative formats on request.
- **Timeliness:** Complaints are acknowledged promptly and resolved within published timescales.
- **Transparency:** Students are informed of how decisions are made, and reasons are clearly explained.
- **Confidentiality:** Complaints are handled sensitively and in accordance with data protection requirements.
- **Support:** Students are entitled to bring a representative or advisor to meetings.

4. Complaint Stages

Stage 1: Early Resolution

Students are encouraged to raise issues informally with relevant staff as early as possible. Many issues can be resolved quickly without the need for a formal process. The student should raise any concerns as soon as possible, and in any case within 21 days of the issue arising.

A complaint should be raised by the student contacting, in writing, the Course Leader or other senior member of staff. The student should give details of their complaint and ensure they include any relevant evidence, such as copy emails, screenshots, reference to the specific area of a publication, dates of meetings, etc. An acknowledgement of receipt of the complaint should be sent to the student within 3 working days.

The outcome of the complaint dealt with informally should be briefly recorded and a copy sent to the student, along with any additional evidence and including reasons for the decision. Normally, complaints handled through Informal Stage 1 shall be dealt with within 10 working days.

Anonymous complaints are normally ignored. Unsigned complaints are only accepted if they are sent via email. Complaints delivered by hand or by post that are unsigned will be returned to the sender with request for a signed resubmission.

Stage 2: Formal Complaint

If the complaint cannot be resolved informally, students may submit a formal complaint using the official form. Acknowledgement will be sent within 5 working days. The complaint will be reviewed by a senior manager not involved in the issue, where a formal outcome will be provided within 20 working days, with a full rationale.

If the student remains dissatisfied with the result of the outcome of the informal stage, then, within 10 days of receiving the College's written response to the informal

complaint, the student should submit the formal complaint in writing on a Notification of Formal Complaint Form and send it to student services department. It is important to include as much relevant information as possible, and submit the form with supporting documentary evidence. If a complaint is about, or concerns student services, it should be addressed to the Principal. Anonymous complaints will not be accepted.

Student Services will conduct an initial review of the complaint to confirm whether it can be accepted for investigation. If the complaint cannot be accepted, the student will be informed, with full reasons why, and advice on any further action that may be taken.

The key questions considered in the initial review will be:

- Is this the appropriate procedure for the matter raised to be considered?
- Was early resolution attempted? If not, can it be referred back to that stage?
- Is it clear what the complaint is about, and which areas of the College are involved?
- Has appropriate evidence been provided?
- What outcome is the student hoping for? Can that outcome be achieved?
- Is the complaint suitable for mediation?

Stage 3: Review Process

If a student is dissatisfied with the Stage 2 outcome, they may request a review based on procedural error, new evidence, disproportionate outcome. A review panel will be convened, and a final written decision issued within 15 working days.

If the complaint is accepted student services will refer the complaint to the Complaint Committee, which appoints an Investigating Officer, with no previous involvement in the subject matter of the complaint, as soon as possible. The Investigating Officer will carry out an investigation into the complaint within the timelines prescribed below, with support, advice, and guidance on any aspect of the procedure as required from Student Services. A thorough and unbiased investigation is considered by the College as paramount.

If a complaint is sent directly to the Principal or another member of the senior management team, it will be referred to Student Services in the first instance.

The Investigation

Within 48 hours of the referral, the Investigating Officer will contact the complainant to confirm the main issues detailed in the complaint, and let the complainant know the expected outcome date. The Investigating Officer will undertake a thorough investigation into the matters raised in the complaint, and compile a report setting out the findings and recommendations.

The Investigating Officer will aim to conclude the investigation within 15 working days of receiving the complaint. However, this will depend on a number of factors, for example (this list is not exhaustive): the nature and circumstances of the complaint; the availability of resources; and the availability of any members of staff or students who need to be interviewed.

The Investigating Officer will continue to keep the complainant informed of when he/she expects to conclude the investigation.

The investigation report, which must be forwarded to the Complaint Committee (copy to Student Services), must confirm whether the complaint is upheld (fully or partially), or is not upheld, with detailed reasons given to support the decision. Each point raised by the complainant must be addressed individually and a detailed response made within the report. The report must also list details of the investigation, including any meetings held (either in person or by telephone) as well as all evidence considered as part of the investigation.

All parties to the complaint have the right to see any and all evidence pertinent to the matter.

Investigation meeting

During the investigation, the Investigating Officer may hold meetings with all or any of the parties involved in the matter. The intention of holding a meeting is to give all parties a chance to air their views, and to clarify the salient points the complainant wishes to raise. The meeting should be conducted in as informal manner as possible. Although the complainant and respondent would always be encouraged to present their case in person, all parties can ask to be accompanied to the meeting by one other person for support; this may be a friend, colleague or by a student representative. Neither party can be accompanied by legal representation. It should be made clear that if either the complainant or respondent chooses not to attend the meeting it will not prejudice the investigation; however, the outcome will be reliant on the evidence available at the time.

Meetings will follow the format:

- introductions will be made;
- the complainant (or his/her representative) will be asked to explain the issue and present any supporting evidence. Questions may be asked to clarify certain points;
- other parties to the complaint will be given an opportunity to respond to the complaint.
- Questions may be asked to clarify certain points. Notes must be made during the meeting. These will be held on file and forwarded to the Student Services with the investigation report.

An agreement of the outcome may be made at the end of the meeting. In some circumstances the Investigating Officer will wish to make further investigations, in which case, he/she will confirm to the complainant when the outcome is likely to be known.

Outcome of the investigation

On receipt of the investigation report the Complaint Committee will consider the case and make a decision whether or not to accept the findings. This decision must be communicated to Student Services within 2 working days. Student Services will be responsible for making a formal response to the complainant, and this will be sent to him/her within 3 working days of receiving the written report and confirmation of the decision from the Complaint Committee.

The response 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 is sufficiently serious to warrant an apology;
- another form of redress that can be offered to the student in writing;
- that the matter is a disciplinary one in which case the matter should be referred under the relevant disciplinary procedure and the complaints procedures is discontinued. In that case the complainant will be updated, but 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 it will not be pursued and a disciplinary allegation may be made against the student.

Correspondence from the College regarding the complaint

Every attempt will be made to resolve the complaint within 15 working days of receiving it, although sometimes this time frame may be extended in order for all relevant parties to be allowed time to respond to any queries etc. Where this is the case, the Investigating Officer will email all parties by no later than the 15 working day to inform them of the revised timescales. [B9: Indicator 4] Once the investigation is completed a report will be written (using the template). The report must include information about why the complaint has not been upheld or confirmation that it has, and details of any redress and/or remedial action which is being offered. Recommendations for improvements in practice or regulations will also be included in the report. The report must be submitted to the Complaint Committee, with a copy to the Course Leader. The Complaint Committee must confirm in writing to Student Services whether they accept the findings within 48 hours of receipt.

Student services will write to inform the student of the outcome, and include a copy of the investigation report and any other appropriate documents. The outcome letter will also include information about 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 days of the date of the outcome letter.

The student may confirm in writing that he/she wishes to accept the recommendations and the redress, in this case the formal complaints procedure is then closed. Alternatively, the student may confirm in writing he/she wishes to reject the proposed resolution and the redress. The student must then decide whether to pursue the matter, or not. If not, no further action is required.

If the student wishes to progress to the next stage, they should go to Stage 3 – Review Process. This must be done within 10--days of receiving the outcome letter. If a response is not received from the student within 10-days, it will be assumed that the student has accepted the outcome and no further action is required. If the student does not respond at this stage, a Completion of Procedures letter will be issued once the 10-day deadline has passed which states that the matter is closed and that the complainant has not completed the College procedures in full.

If Student Services accept the recommendation that the complaint is frivolous, malicious or vexatious, an allegation may be made against the student under the Student Disciplinary Procedures which will then govern the case.

Redress is what is offered to the complainant if the investigation concludes that there should be a remedy offered to address the problems raised. Redress will fit the circumstances of the case and may include one or more of the following:

- an apology;
- an opportunity to repeat the experience under better circumstances (not applicable to academic assessment process or results which constitute academic judgment);
- the return of a tuition fee, or proportion of fee, or other financial compensation;
- the provision of a change to the organisation or nature of the College's service or facilities or regulations if found at fault;
- any other appropriate action such as counselling or other support.

The Decision letter notifying the redress is kept on the student's personal file and is treated in accordance with the Data Protection Act and the College's data retention policy. If a request for review (see below) is not received within 10 days then the Decision letter constitutes the final stage of the University's procedures.

Request for Review

It should be noted that a request for review does not necessarily constitute a new investigation, but in the first instance is intended to ensure the College procedures have been correctly followed. If the complainant is not satisfied with the outcome of the formal complaint he/she can request a review of the case using the grounds detailed below, providing that it meets the following criteria:

- submitted in writing using the Request for Review form.
- sent to the Principal and received within 10 days of the date of the outcome letter;
- specifies the grounds of request for review as below;
- accompanied by supporting evidence if any;
- signed and dated by the student.

The valid grounds for Request for Review are (one or more may be used):

- material procedural irregularity;
- disregard of material evidence;
- perversity of judgement in the face of the evidence presented;
- demonstrable bias or prejudice on the part of any person forming the judgement;
- the redress is not proportionate to the complaint;
- new evidence has become available which may have a material bearing on the outcome of the complaint

The Request for Review must clearly explain the reasons for each of the grounds claimed. If full reasons are not given the Request for Review will not be accepted. If a Request for Review is received within 10 days, and satisfies the above criteria, the Academic Dean (or their nominee) will review the case to establish how the complaint was handled, and whether the outcome was fair. The Principal (or their nominee) will compile a report within 15 days confirming whether or not the request for review has been upheld and will indicate one or more of the following:

- whether the complaint was dealt with correctly under the procedure;
- whether any variation in the procedure was material and led to a prejudicial or unreasonable outcome;
- whether the case should be referred for further investigation;

- whether the case should be referred to another College procedure (e.g. Academic Appeal Procedure);
- whether by submitting a request for review the matter is deemed to be vexatious;
- the full reasons for the decision.

A response will be sent to the complainant within 15 working days of receiving the Request for Review, including information about how the decision has been reached and any other relevant information. If there is no further action to be taken this letter will constitute the Completion of Procedures Letter, and will include information to the student of the right to take the matter to the Office of the Independent Adjudicator.

Stage 4: External Review - Complaint to the Office of the Independent Adjudicator

If the internal procedure is exhausted, students may refer their case to the Office of the Independent Adjudicator (OIA), the College will issue a Completion of Procedures letter to enable this referral. If you are not satisfied with the provider's final decision and would like the OIA to review your complaint, you should complete an OIA Complaint Form. The easiest way to submit a complaint is by creating a MyOIA account. MyOIA is a new secure online portal for providers and students (and their representatives) which provides an easy and more intuitive way to submit a complaint, and to track the progress of cases. You can also contact us by e-mail, post or telephone and we will send you a form.

A response will be sent to the complainant within 15 working days of receiving the Request for Review, including information about how the decision has been reached and any other relevant information. If there is no further action to be taken this letter will constitute the Completion of Procedures Letter, and will include information to the student of the right to take the matter to the Office of the Independent Adjudicator. If you require an adjustment to the way we communicate with you due to a specific accessibility or disability need please contact us by e-mailing accessibility@oiahe.org.uk or calling 0118 959 9813.

We must receive your signed OIA Complaint Form in this Office within 12 months of the date of the Completion of Procedures Letter; otherwise we will consider your complaint to be out of time. For example, if your Completion of Procedures Letter is dated 7 January, we should receive your Complaint Form by 7 January the following year. Please also send us a copy of the Completion of Procedures Letter and a copy of your complaint or appeal (if you have it). Keep proof of posting or sending us your OIA Complaint Form.

The Office of the Independent Adjudicator for Higher Education may be contacted at:

Office of the Independent Adjudicator

Second Floor, Abbey Gate

57-75 Kings Road

Reading RG1 3AB

Tel: 0118 959 9813

Email: enquiries@oiahe.org Website: www.oiahe.org.uk

5. Communication and Awareness

Students are informed of the complaints policy in offer letters and student contracts, with further information underlined at induction and via the Student Handbook, College website and VLE and through student support and academic advising teams. All communications about the policy are written in plain English and meet the accessibility expectations of Condition F1 and Condition C5.

6. Link to Student Protection and Redress

Complaints may intersect with issues addressed by the Student Protection Plan (SPP), such as course changes, module withdrawals, disruption to facilities or support services and discontinuation of programmes or teaching locations. Where a complaint is upheld and the issue caused financial loss or serious disruption, students may also be entitled to a refund or compensation under the College's Refunds and Compensation Policy, in line with OfS Condition C3

7. Equality and Fairness in Complaints

In compliance with Initial Condition C5: Treating Students Fairly, the College's complaints process is designed to ensure all students are treated with respect and impartiality providing support for students with disabilities or specific needs and guarding against any retaliation or negative consequence for submitting a complaint. The College is committed to delivering clear communication and humane decision-making throughout the process

Training is provided to all staff involved in handling complaints to ensure equity, professionalism, and regulatory compliance.

8. Monitoring and Review

This policy is reviewed annually by the Academic Board & the Quality Assurance Committee prior to the Board of Governors. The review process, including student feedback, considers complaint volumes and types, identifying trends and systemic issues for institutional improvement, with confirmation of timescales for resolution

Annex A: College compliance with OfS & CMA guidance and criteria

Commentary on the Introduction

The introduction to this policy confirms the College's framework for trust, transparency, and compliance with consumer and student protection law. It

acknowledges that students, as both learners and consumers, have the right to raise concerns without fear or disadvantage—and to have those concerns taken seriously.

Office for Students (OfS) Requirements and Registration Application Process

The OfS sets out specific expectations for complaints handling as part of the Registration Application Process, across several key regulatory conditions which the College is cognisant of and reflected in its compliant processes and procedures for handling complaints from students:

Condition C1: Guidance on Consumer Protection Law

The College confirms it has an accessible and effective complaints process that enables students to seek redress if it fails to meet contractual obligations or published standards. The Complaints procedure is clear, easy to find, and explained to students at the **pre-contract, offer, enrolment** stages and at **Induction**.

Condition F1: Provision of information to students

The College informs students in plain language about how and when they can raise concerns or make formal complaints, confirming that complaints procedures are available before enrolment and made visible through handbooks, websites, and contracts.

Condition C3: Student Protection Measures

The College includes complaints handling as part of its Student Protection Plan (SPP), ensuring students can challenge institutional decisions or seek remedies if course changes or disruptions occur. Complaints may also trigger eligibility for refunds or compensation under the SPP framework.

Initial Condition C5: Treating Students Fairly

The College is committed to treating students fairly and equitably throughout the complaints process which includes transparent procedures that do not disadvantage any student with safeguards to prevent retaliation or bias, with recognition of the emotional impact of unresolved grievances. The College aims to ensure timely, respectful communication with complainants at every stage.

The policy ensures the College meets the requirements of OfS Conditions C1, F1, C3, and C5, and is aligned with the Competitions & Market Authority's (CMA) Consumer Law Guidance, which requires:

- Accessible and well-publicised complaints procedures
- Timely resolution of student concerns
- Fair and independent decision-making

- Opportunities for students to escalate complaints appropriately
- Confidence that students will be treated with dignity, and not penalised for speaking up.
- By integrating the OfS Conditions:
- **C1:** The College ensures complaints are dealt with as part of the student contract, with access to redress if promises are not fulfilled.
- **F1:** The College guarantees that students are given this information before enrolling, making it a cornerstone of informed consent.
- **C3:** The College incorporates complaints as a protective mechanism in the face of institutional change or failure.
- **C5:** The College ensures students are treated **fairly, respectfully, and supportively**, no matter the nature of their complaint.

This policy underlines commitment to acting not only as a compliant provider, but as a trustworthy, student-focused institution that values dialogue, improvement, and justice.

The End