

Student Complaints Procedure

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| Owner | Head of Centre | | |
| Version | 1.0 | | |
| Changes | Updated related policies; clarified Stages 1–4 with sector-compliant wording; added conciliation, panel composition, and escalation guidance; added digital accessibility commitment; and justified a six-year retention period. | | |
| Approval date | May 2026 | Approved by | Academic Council |
| Implementation date | June 2026 | Date of next review | May 2027 |
| Related internal policy | <ul style="list-style-type: none"> • Consolidated Student Appeals Procedure • Student Disciplinary Procedure • Student Safeguarding, Prevent and Harassment Policy • Code of Practice on Freedom of Speech • Fitness to Study Procedure (<i>if applicable to overlapping cases</i>) • Data Protection Policy | | |
| Related external policies and regulations | <ul style="list-style-type: none"> • Pearson Centre Handbook – Higher Nationals (Global) • UGC (University Grants Commission) – Redressal of Grievances of Students Regulations, 2023 – Core Practices (Concerns, Complaints, and Appeals) • RPwD Act 2016 (disability rights) • POSH Act 2013 • Constitution of India: Articles 14–17 • Consumer Protection Act 2019 • DPDP Act 2023 | | |

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Purpose

1. This document describes the procedure RCL Mumbai will follow when handling complaints raised by students, including prospective, current, and recent students, regarding actions or omissions by the College or its staff.
2. The intended audiences for this procedure are:
 - a) Students who wish to raise a complaint (hereafter referred to as 'the complainant')
 - b) College staff involved for managing or responding to complaints, including those who may be the subject of a complaint.
3. This procedure is guided by the *Good Practice Framework for Handling Complaints and Academic Appeals* published by the Pearson. It is also designed to meet the regulatory expectation of Pearson, ensuring fairness, transparency, and accessibility throughout the complaints process.

Advice and Support

4. Students seeking advice or support in making a complaint are encouraged to contact their designated Student Success Officer (SSO), who can provide guidance on the process and available resources.
5. The College is committed to ensuring equitable access to the complaints procedure. Reasonable adjustments will be made for students with disabilities, long-term health conditions, or other support needs, in line with our inclusive practice and legal obligations under the Constitution of India.

Scope and Application

6. For programmes delivered in RCL Mumbai internal complaints procedure must be completed before a student can escalate their case to the RCL Mumbai

7. Once the College's process has concluded, students will be signposted to the relevant complaints or review procedure of the awarding university. Completion of that stage is required before a case becomes eligible for external review by the Office of the Independent Adjudicator (OIA).

| Student type | Procedure application |
|----------------------|--|
| HND (Pearson) | Full complaints procedure applies. |
| Regent College Award | Full complaints procedure applies, including the final review stage. |

8. If students are unsure who awards their degree, they should contact their SSO for clarification.

Definitions used in this procedure

- **Working Day:** Monday to Friday, excluding INDIAN public holidays and College closure periods.
- **Calendar Day:** Any day of the week, including weekends and holidays.

- **Receipt of Formal Complaint:** The date the College receives a completed Student Complaints Form at Stage 2. Day 0 for formal timelines.
- **Early Resolution (Stage 1):** An informal, stage led by Student Services to resolve straightforward concerns quickly. This may involve providing information, explanation, apology, and/or conciliation.
- **Conciliation:** a voluntary, informal process used during Stage 1. An impartial staff member facilitates a discussion between the complainant and the relevant department to help both parties reach a mutually acceptable resolution. Participation does not affect the complainant's right to proceed to Stage 2.
- **Formal Complaint (Stage 2):** A formal investigation initiated upon receipt of the Student Complaints Form. It is led by an impartial Quality Officer and decided by a Complaints Panel.
- **Formal Hearing:** An optional component of Stage 2 used only when necessary to ensure a fair and thorough decision, typically in complex or contested cases.
- **Complex case:** A complaint involving multiple issues or parties, extensive evidence, or disputed facts. May justify a hearing extension of Stage 2 timelines.
- **Case Owner:** The Quality Officer assigned to manage the Stage 2 investigation and coordinate communications.
- **Complaints Panel:** An impartial group drawn from the College's approved Panel Pool to determine the Stage 2 outcome. Panel members must have had no prior involvement in the case.
- **Supporter:** A person who accompanies the complainant to meetings or hearings. Normally a friend or family member). The supporter may offer moral support and assist with presenting the case but cannot act as a legal representative or speak on the complainant's behalf.
- **Completion of Procedures (CoP) letter:** A formal letter issued at the end of the internal complaints process. It confirms the outcome and outlines the next steps available to the students, and associated deadlines.

Eligibility to Submit a Complaint

9. A complaint may be submitted by:
 - a) A **prospective student**;
 - b) A **currently enrolled student**;
 - c) A **former student** who completed, withdrew from, or was otherwise enrolled at the College within the past six months, where the matter relates to their time as a student.

10. Complaints may be submitted by individuals or groups, a nominated representative should be identified to coordinate communication.

Representation and Support

11. Students may be supported or represented during the process by a **trusted person**, normally a friend or family member. The supporter may provide moral support and assist in presenting the case but may not act as a legal representative or speak on the student's behalf.

Legal Representatives

12. In line with the *OIA Good Practice Framework*, the College does **not normally permit legal representatives** to act on a student's behalf during internal complaint proceedings. Students are free to seek independent legal advice at any stage; however, all formal communication will be directed to the student as the complainant.

13. Where a student **formally authorises a representative**, the College will acknowledge their role but will not alter or bypass the internal complaints process. Communication may be copied to the representative for transparency, but the College will continue to correspond directly with the student.

Limitations of this Procedure

14. The College will **not accept complaints from third parties** unless they have been formally authorised in writing by the complainant. This protects student privacy and complies with data protection legislation.
15. **Anonymous complaints** will not normally be accepted. However, where there is a compelling safeguarding, whistleblowing, or legal justification supported by credible evidence, they may be considered on a case-by-case basis by the Head of Centre..
16. Students are encouraged to use the **Report+Support** system for anonymous disclosures relating to safeguarding, harassment, bullying, or sexual misconduct.
17. If an anonymous complaint is pursued, the College will take reasonable steps to maintain confidentiality while ensuring fairness to any individuals named. The scope of any investigation may be limited if anonymity prevents full engagement.

Out-of-Time Complaints

18. Complaints should normally be submitted:
 - within three months of the event or final decision being complained about, or
 - within six months of the student leaving the College – whichever is earlier.
19. Complaints received after these deadlines will not normally be accepted unless the complainant provides **clear and evidenced exceptional circumstances** (e.g. serious illness or bereavement).
20. If no valid reason is provided, the complaints will be rejected and a **Completion of Procedures (CoP)** letter will be issued stating that it was not accepted due to being out of time.

21. Where an exceptional reason is accepted, the complaint may be considered on an **exceptional basis**, and this will be recorded in the outcome letter.

Definition of a Student Complaint

22. A complaint is an **expression of dissatisfaction** about an act, omission, or service provided by the College, its staff, or authorised representatives (e.g. contractors, service providers, or agents acting on behalf of the College).
23. Examples include:
- Failure to follow a policy, the Student Charter or the Code of Conduct on Freedom of Speech;
 - Substandard facilities or services (e.g., IT, library);
 - Incorrect or misleading published information.

Matters Not Addressed by This Procedure

24. The following are **outside the scope** of this procedure:
- Student misconduct (see *Student Disciplinary Procedure*);
 - Harassment, bullying, or victimisation (see *Student Safeguarding, Prevent and Harassment Policy*).
 - Academic appeals (see *Consolidated Appeals Procedure*).
 - Dissatisfaction with the outcome of another procedure, unless the complaint concerns an alleged failure to follow that procedure correctly.

Procedure Stages

25. The College's complaints procedure consists of **two main stages**:
- **Stage 1: Early Resolution** – an informal process aimed at resolving straightforward concerns quickly.
 - **Stage 2: Formal Complaint** – a formal investigation and decision-making process.

Students dissatisfied with the Stage 2 outcome may submit a request a **review** of the decision.

Stage 1: Early Resolution

26. Early resolution is led by Student Success and aims to address concerns informally and promptly.
27. Students should raise issues with their SSO, who may offer:
 - information or clarification
 - an explanation or apology
 - conciliation where appropriate.
28. If the complaint concerns the SSO, students may approach the Head of Centre or another Student Services staff member.
29. The SSO may refer the student directly to Stage 2, if the issue is **too serious or complex**.
30. Stage 1 aims should conclude within **10 working days** of initial contact.
31. If unresolved, the SSO will issue a brief **Stage 1 closure email** within **2 working days**, summarising the outcome and inviting the student to submit the **Student Complaints Form** to begin Stage 2.

Stage 2: Formal Complaint

32. Stage 2 begins when the student submits the **Student Complaints Form**, via the College website, along with supporting evidence. Incomplete or unclear forms may be returned for revision.

Eligibility

33. A complaint may proceed to Stage 2 if:
 - Stage 1 was attempted, but unresolved, or
 - The student chooses to or is advised to bypass Stage 1.

Investigation

- A Quality Officer with no prior involvement will conduct an impartial investigation.
- This includes reviewing the complaint, evidence, relevant records, and meeting with involved parties if needed.
- A written report will be prepared summarising findings and recommending an outcome.

Decision

- A Complaints Panel drawn from the College's approved Panel Pool will make the final decision.
- Panel members will have had no prior involvement.
- The outcome will be communicated in writing, with reasons provided.

Formal Hearing (Optional)

34. A hearing may be convened if the case is complex or contested and written evidence alone is insufficient.
35. A decision to hold a hearing:
 - Is made by the Head of Centre (or nominee)
 - Students may request a formal hearing, but it will only be granted if deemed necessary for a fair and thorough resolution.
36. Panel composition:
 - Three impartial staff members, normally including at least one from outside the relevant School.
 - A **Quality and Governance Team** member will act as secretary.
37. Students will be notified **10 working days** in advance and will be provided with:
 - Panel member details and right to object (within 3 working days)
 - Right to be accompanied by a supporter

- Guidelines for submitting evidence and calling witnesses (5 working days before hearing)
 - Right to respond to evidence and question witnesses through the Chair.
38. Hearings may proceed without the student if proper notice has been given and no reasonable excuse for absence is provided.
39. The panel's outcome and rationale will be issued in writing within **10 working days** of the hearing.

Possible Outcomes of a Formal Complaint

40. At the conclusion of Stage 2, the decision will be one of:
- **Upheld** – fully justified
 - **Partially Upheld** – some aspects justified
 - **Not Upheld** –not justified.
41. Each outcome will include a rationale and any actions, or remedies to be implemented.

Stage 2 Timeline

- Acknowledgement of complaint: within **2 working days**
- Investigator assigned: within **3 working days**
- Initial plan and info request (if needed): within **5 working days**

Completion

- Decision normally issued within **30 working days** of submission
- One extension of up to **10 working days** may be applied with written notice
- The full process (including review) should be completed within **90 calendar days** of receipt.

Review and Completion of Procedures

42. If dissatisfied, students may request a **review** within **10 working days** of receiving the Stage 2 outcome.
43. Review criteria:
 - Whether the College's procedures were followed correctly
 - Whether the outcome was reasonable; or
 - Whether new material evidence is available that could not reasonably have been provided earlier.
44. Review process:
 - Conducted by a senior member of staff with no prior involvement
 - Completed within 15 working days
 - Outcome communicated in writing with reasons.

Completion of Procedures (CoP) Letter

45. Issued at the end of the internal complaints process, unless the complaint is referred to a partner university (in which cases, the university issues the CoP letter).
46. The CoP letter will:
 - Confirm the outcome
 - State that internal procedures are complete
 - Provide information on referring the case to the **Office of the Independent Adjudicator (OIA)** within **12 months**.

Record Keeping and Reporting

47. The **Academic Quality Team** maintains a secure log of all complaints and produces a **biannual report** to Academic Council. This report includes:
 - Complaint categories and outcomes
 - Identified risks
 - Actions taken and lessons learned.

48. Complaint records are retained securely for a **minimum of six years** in accordance with **data protection legislation** and **sector good practice**.

Accessibility

49. The College is committed to ensuring that all students can access and engage with the complaints process on an equal basis. In line with the **Equality Act 2010**, and guidance from the OfS and OIA:
- This procedure is available in **alternative formats** (e.g., large print, audio, digital text) upon request.
 - It is also published in **digitally accessible formats** as standard.
 - **Reasonable adjustments** will be made for disabled students and those with long-term health conditions to ensure they can engage with the process without disadvantage.
 - Students who require help understanding or navigating the complaints procedure may seek help from their SSO or Student Welfare contact. Support includes:
 - Explaining the process,
 - Clarifying what evidence may be needed,
 - Guiding students on how to present their complaint
50. Support officers provide guidance only and do not advocate on behalf of the student or influence the outcome.
51. Requests for adjustments should be made at the earliest opportunity to Academic Quality or a Student Success Officer and confirmed in writing.