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GBS Student Complaints Policy and Procedure

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Policy lead (Staff member accountable)	Provost
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Related GBS policies

- GBS Student Charter
- GBS Student Code of Conduct
- GBS Academic Appeals Policy
- GBS Student Protection Plan
- GBS Student Disciplinary Policy
- GBS Equality and Diversity Policy
- GBS Records Management and Retention Policy
- GBS Anti-Harassment and Anti-Bullying Policy
- GBS Staff Disciplinary Policy
- GBS Reasonable Adjustment Policy

External Reference Points

1. Information Commissioner's Office, Accessed online at: <https://ico.org.uk/>
2. UK Public General Acts, *Data Protection Act 2018*, Accessed online at: <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>
3. [UK Quality Code for Higher Education, Advice and Guidance: Concerns, Complaints and Appeals](#). GBS has fair and transparent procedures for handling complaints which are accessible to all students. Findings from complaint investigations will be used to

improve services for students and the student experience. Recommendations are monitored by the Academic Standards and Quality Committee.

4. Office of the Independent Adjudicator for Higher Education [OIA Good Practice Framework](#), Handling Complaints and Academic Appeals.

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1. What is the purpose of the Student Complaints Policy and Procedure?

At Global Banking School (GBS) we aim to provide a student experience that changes the lives of all our students, fosters a culture of positive wellbeing and values their voices. However, we recognise that concerns or complaints may arise from time to time. The Student Complaints Policy and Procedure ('the Policy') sets out how to raise complaints as well as the process through which they are considered.

2. Who can make a complaint?

Students who are registered with GBS or those who have recently finished their studies can make a complaint under this Policy, provided that complaints are raised within the timeframe stipulated in the Policy.

3. What is a complaint?

GBS defines a student complaint as an expression of dissatisfaction by one or more students about something GBS has done or not done, or about the standard of service provided by or on behalf of GBS.

Examples of matters considered under this Policy include:

- Student experience e.g. GBS services, conduct of GBS staff etc;
- Teaching and learning experience e.g. quality of teaching, teaching facilities;
- failure on the part of GBS to meet stated obligations;
- Academic services e.g. library services, online resources;
- Administrative services e.g. Registry, Finance, etc.

If your concern is of a general nature, it may be more appropriate for you to raise the matter via the Student Representative Committee for your programme or with the relevant member of staff, e.g. your programme leader.

4. What is not covered by this Policy?

Academic Appeals: appeals against the decision of an assessment board fall under the Academic Appeal Policy. Where a complaint contains an element of an academic appeal, you must submit a separate academic appeal in line with the GBS Academic Appeals Policy.

Bullying or harassment: allegations of bullying or harassment by a student fall under the GBS Anti-Harassment and Anti-Bullying Policy and Procedure for Staff and Students. If you believe you are being bullied or harassed, you should first consult the Dean of Students for advice.

Whistleblowing: Matters of public interest should be raised under the Whistleblowing Policy.

Data Protection: requests for a copy of personal data, or to amend or delete it should be referred to the Data Protection Officer: dpa@globalbanking.ac.uk

5. General Principles

Timely and transparent procedures

All complaints are dealt with in a timely manner and through processes which are clear, straightforward, and transparent.

Anonymity or third-party complaints

Complaints require investigation to enable resolution. For practical reasons therefore, no action will be taken in the event of complaints made anonymously.

Complaints made by a third party (including parents, family or friends of registered students) can only be dealt with if you provide permission in writing for the third party to make the complaint on your behalf.

Submission in good faith

GBS presumes that all complaints are submitted in good faith. You will not be disadvantaged for making a complaint. Complaints that GBS considers to be unreasonably persistent or made falsely will not be considered and could result in action through GBS Student Disciplinary Policy and Procedures.

Impartiality in investigation

All complaints will be investigated by staff who have no connection to the complaint.

Privacy

Staff investigating complaints respect the privacy of all parties. Information about the complaint is only given to those immediately involved and/or those whose participation is necessary for a resolution.

Confidentiality

Confidentiality will be respected in conducting all aspects of the complaint procedure. However, any student or member of staff about whom a complaint is made has the right to be informed of the complaint and its nature and have access to any relevant evidence.

If you request that your identity is kept confidential, this is respected up to the point where disclosure is necessary to progress or resolve the issue, in which case you will be informed in advance that this information is going to be disclosed.

GBS will not disclose any information to third parties regarding investigations and outcomes from student complaint cases unless legal exceptions under the [Data Protection Act](#) apply.

Members of staff named in complaints

At all times following the submission of a complaint, a member of GBS staff who is named in the complaint or whose conduct is called into question by the complaint has the right to be accompanied by a friend or supporter, who shall normally be another member of staff of GBS.

6. Advice and Guidance

If you are considering making a complaint, you are encouraged to consult the following staff members for advice:

- Dean of Students
- Student Success Tutors
- Deans, Associate Deans or Programme Leaders

7. Student Representation

You can be accompanied by a friend or supporter to any discussions or meetings, but not by a legal representative. At least 48 hours before the discussion or meeting, you

should advise the relevant member of staff (e.g. meeting secretary) of the name and status of the person accompanying you.

8. Complaints against GBS staff

Where a complaint is against a member of GBS staff the following principles apply:

- an assumption of no fault until the outcomes of the investigation finds differently.
- the right of the member of staff to be informed of the complaint and have access to any relevant evidence presented.
- the right of the member of staff to be accompanied to any discussions or meetings by a colleague or supporter.
- the right of the member of staff to know the outcome of the complaint; and
- confidentiality of the process.

Where a complaint involving an allegation of misconduct by a member of staff is upheld, this may form the basis of further action under the GBS Staff Disciplinary Policy.

9. Staff involvement in the Complaints Procedure

It may be appropriate for a member of staff to be called as a witness or provide information as part of a complaint investigation. In these circumstances it is expected that GBS staff will support the operation of the procedure.

10. GBS Complaints Procedure: Overview

There are three stages in the complaints procedure:

Stage 1: Informal Conciliation

Stage 2: Formal Complaint

Stage 3: Internal Review

Stage 1: Informal Conciliation

If you want to make a complaint, you should contact the Dean of Students Office using the QR code that is available at all campuses on noticeboards and at the customer services desks, or via studentfeedback@globalbanking.ac.uk.

You should raise the complaint as soon as possible and normally no more than 10 working days after the issue arose. You will need to provide information about what has happened, as well as the action or outcome you are seeking.

A member of staff from the Dean of Students Office will aim to resolve the complaint within 10 working days of receiving it. You will be informed of the outcome in writing.

In exceptional circumstances, it may be appropriate for complaints to progress directly to Stage 2 of the Procedure without attempting conciliation at Stage 1. Examples include complex complaints that require investigation.

Stage 2: Formal Complaint

If you are not satisfied with the outcome of Stage 1, you can make a Stage 2 complaint using the Stage 2 Student Complaints Form. You will be asked to explain in the form why you are dissatisfied with the Stage 1 outcome.

If you wish to make a complaint at Stage 2 directly, without going through Stage 1 informal conciliation, you will be asked to explain why this is the case in the Stage 2 Complaint Form.

You should submit the Stage 2 Complaint Form within ten working days of receiving the outcome of Stage 1. The completed form should be submitted to studentfeedback@globalbanking.ac.uk

An extension of these time limits will only be possible in exceptional circumstances, such as illness or other matters that are beyond your control. In such circumstances, you should submit the Stage 2 Complaint form as soon as possible and explain in the form the reason for submitting it outside the normal time limit.

All Stage 2 complaints are processed by the Dean of Students Office, which will contact you to confirm the complaint and discuss the issues.

If the complaint is more appropriately investigated through the academic appeals procedure, then it will cease to be handled as a complaint at this point and will instead be processed as an academic appeal.

If the complaint concerns a member of staff and/or concerns harassment or bullying matters, the Dean of Students consults with the Head of Human Resources regarding the appropriate procedure to adopt before investigating.

Stage 2 investigation

The Dean of Students or nominee will investigate the complaint. As a matter of principle, the investigator must have no connection to the complaint.

The investigator will:

- review any relevant documentation, including correspondence;
- interview any relevant persons and, where appropriate, ask them for a written statement;
- keep all parties involved in the complaint informed on the progress of the investigation.

The investigator will submit a report to the Dean of Students within 15 working days of being appointed. The report provides a summary of the evidence gathered about the complaint, responding to all complaint points and making clear the grounds on which a recommendation is proposed. The report makes one of three recommendations:

- to dismiss the complaint;
- to suggest a resolution to you (and the member of staff, where appropriate). If you (and the member of staff, where appropriate) accept the resolution, the procedure ends at this stage. If the resolution is not mutually accepted within five working days, then the investigator will revisit their recommendation;
- to find the complaint justified and make an offer of redress to you, for example, an apology and/or appropriate recommendations.

After receiving the report, the Dean of Students will write to you within five working days with the outcome of the investigation, dealing with each point of complaint and including actions, as appropriate.

Stage 3: Internal Review

If you are not satisfied with the outcome of Stage 2, you can ask for an internal review using the Stage 3 Student Complaints form, which you should send to studentfeedback@globalbanking.ac.uk. In the form you will be asked to explain why you are not satisfied with the Stage 2 outcome and which grounds for review you have selected.

The grounds for review are:

- evidence that the Stage 2 procedure was not conducted properly;
- new evidence that you were unable, for valid reasons, to provide earlier in the procedure;
- the Stage 2 outcome was unreasonable.

Within 10 working days of the request for review, the Provost or nominee will decide whether there is a clear case to refer the matter to the Complaints Review Panel, provided that:

- there is, at the time, still a complaint which comes under the scope of this procedure;
- the request for internal review was submitted within the set time limit.

If there is no case to proceed to the Complaints Review Panel, GBS will write to you explaining the reasons for the decision. If you are not satisfied with the response, you will be given the option of proceeding direct to an Independent Review by the Office for the Independent Adjudicator for Higher Education (OIA) (see section 12).

If there is a clear case for proceeding, the Provost or nominee may consider the possibility of convening a mediation meeting with the parties involved. You can decline mediation if you prefer the case to go to the Complaints Review Panel.

If the mediation meeting is successful, you (and all others involved in the case) will be informed of the outcome in writing within 10 working days.

Where a mediation meeting is unsuccessful or is not appropriate, the Provost or nominee will arrange for the Complaints Review Panel to meet within 30 working days of the request for review and to come to a decision on the complaint.

Stage 3 Complaints Review Panel

The Complaints Review Panel normally consists of the following members:

- a Chair, who is a senior manager at GBS and who has not been involved in the case;
- two members of staff not involved in the case.

Where possible, we aim to ensure that the composition of the Complaints Review Panel reflects the character of GBS. The Academic Standards and Quality Office provides secretarial support to the Complaints Review Panel.

The Dean of Students provides the Complaints Review Panel with the completed Stage 2 Complaint form, the Stage 2 investigator's report, correspondence relating to the complaint and any other relevant documentation.

The Panel meeting will take place either on GBS premises or via Microsoft Teams. You can be accompanied at the meeting by a friend or a supporter but not by a legal representative.

Where several students are bringing the same complaint, they shall appoint not more than two of their members to attend the hearing. Each may be accompanied by one friend or supporter, but not by a legal representative.

After the date of the meeting has been fixed, the Complaints Review Panel secretary will write to you to at least 7 days in advance to:

- notify you of the date of the Panel meeting;
- request that you submit any written statements or evidence at least two working days before the date of the Panel meeting.
- request that you provide the name of your friend or supporter, and of any witnesses you would like to call. Please note that it is your responsibility to notify your friend or supporter as well as any witnesses about the meeting;

- request that you provide details of any reasonable adjustments that may need to be made at the meeting if you have a declared disability.

The Complaints Review Panel secretary will circulate all the information received to you, the Panel and any others involved at least two working days before the date of the meeting. Written information not received in advance will not be considered by the Panel unless it decides, in exceptional circumstances, to accept such evidence for consideration.

If you do not attend the meeting of the Panel, it will consider whether there is a valid reason for you not attending, and will either:

- postpone the meeting to a later date;
- continue with the meeting in your absence.

The Complaints Review Panel secretary will write the report on behalf of the Panel, summarising the complaint, the information provided to the Panel and the outcome.

The Panel Chair will write to you with the outcome of the Complaints Review Panel within 10 working days of the Panel meeting.

Once the Stage 3 procedure has been completed, GBS will send you a completion of procedures letter which confirms that the GBS Student Complaints Procedure has been completed.

In the case of a complaint about a member of the senior management team, a Stage 3 complaint is heard by the Chief Executive Officer. A Stage 3 complaint against the Chief Executive Officer will be heard by an independent external individual.

11. Awarding partner institution's complaints procedure

On completion of the GBS procedure, students taking programmes awarded by a partner institution may be able to make a complaint through the partner institution's complaint process. For further information, please see the relevant awarding partner's complaints policy and procedure. If a student is able to make a complaint through the partner institution, the partner's procedure must be completed before the student can request an external review (see section 12).

12. Independent External Review

If you have exhausted the internal procedures of GBS at completion of Stage 3, and, if applicable, those of the partner institution, and you are not satisfied with the outcome you can request that the case is reviewed by the Office of the Independent Adjudicator for Higher Education (OIA). The OIA is a body independent of GBS, universities and of other higher education institutions.

The OIA must receive a completed scheme application form within twelve months of the date of the completion of procedures letter. The grounds and eligibility for review shall be determined by the OIA. Further details can be found on the OIA website: <https://www.oiahe.org.uk/>.

13. Reporting to Academic Board

The Dean of Students reports annually to Academic Board on the Stage 2 and Stage 3 complaints received. The report includes:

- The number of complaints considered at Stage 2 and their outcomes.
- The number of complaints considered at Stage 3 and their outcomes.
- The number of complaints considered by the OIA and their outcomes.
- Any recommendations for improvement to the Student Complaints Policy and Procedure.

14. Roles and Responsibilities

Responsibility for the management and implementation of this policy and procedure lies with the Dean of Students, Provost/nominee, Academic Standards and Quality Office and appointed investigators.

The Dean of Students Office manages Stage 1 and Stage 2 of the Procedure, and keeps records of those cases; the Academic Standards and Quality Office manages Stage 3 and keeps records of Stage 3 cases.

Students are responsible for familiarising themselves with this policy and procedure and for acting in line with it. It is the responsibility of students to seek clarification from GBS staff if necessary.

15. Monitoring and Review

This policy may be amended by GBS at any time. GBS will ensure that all staff receive appropriate training to enable them to comply with this policy. GBS will regularly test our systems and processes to monitor compliance. Any issues related to the monitoring and review of this policy, please contact asqo@globalbanking.ac.uk.

16. Data Protection and Confidentiality

GBS is registered with the Information Commissioner's Office as a Data Controller. Details of the School's registration are published on the [Information Commissioners website](#). GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information is performed in accordance with the UK General Data Protection Regulations (UK GDPR) and under the Data Protection Act 2018 (DPA).

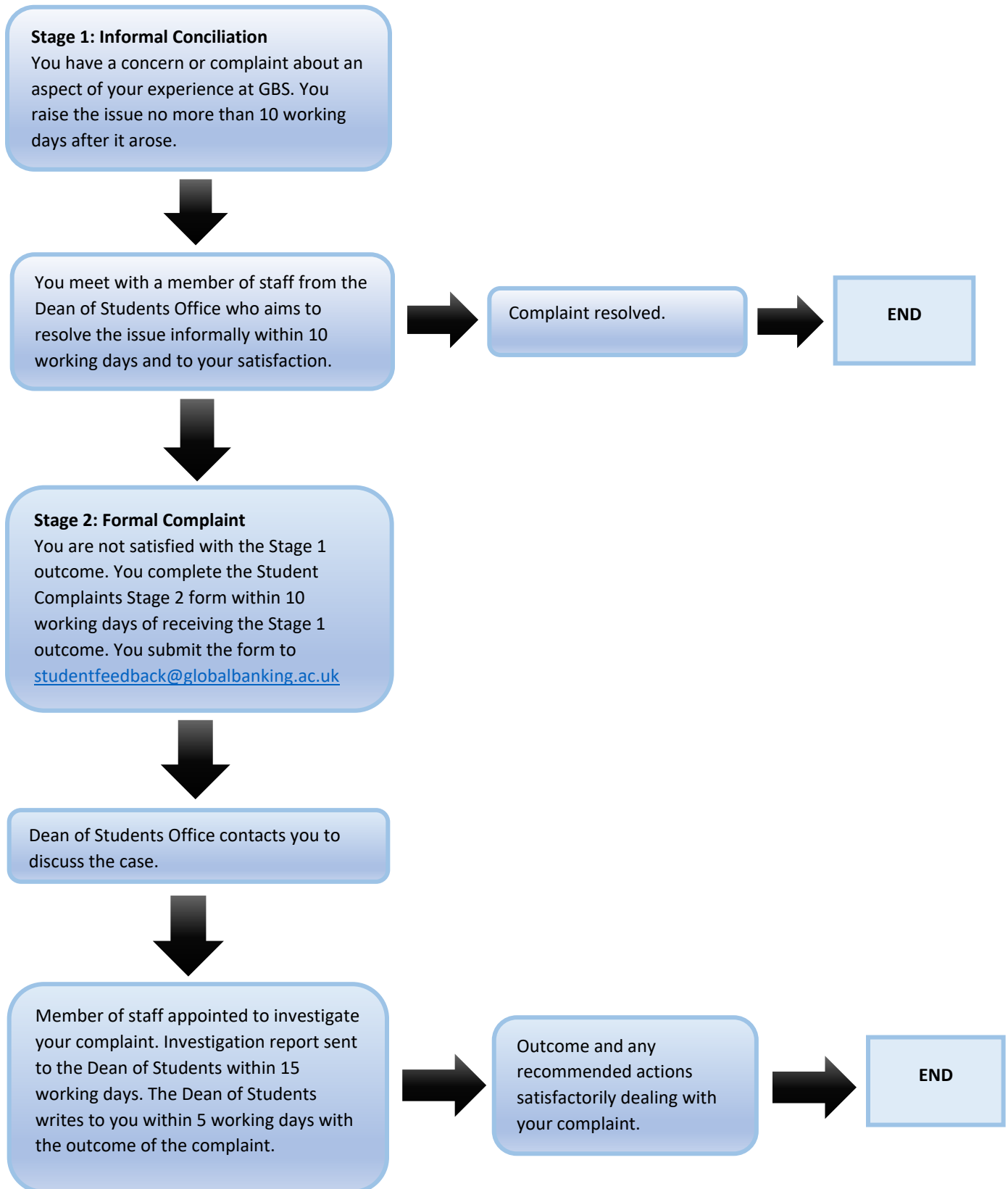
By submitting a complaint, you are agreeing that GBS can process, use, and share information it contains to enable the complaint to be considered. Information may be disclosed to any person who has a need to see it for the complaint to be fully investigated. Information may also be shared with relevant people after a complaint to facilitate actions and recommendations after investigation. For Data Protection purposes and compliance matters, please contact dpa@globalbanking.ac.uk.

All documentation relating to complaints will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the complaints process, or as required by law.

17. Alternative Format

This policy can be provided in alternative formats (including large print, audio and electronic) upon request. For further information, or to make a request, please contact the Academic Standards and Quality Office at asqo@globalbanking.ac.uk.

Annex: GBS Student Complaints Procedure Flow Chart



Stage 3: Internal Review

You are not satisfied with the Stage 2 outcome. Complete the Student Complaints Stage 3 form and submit it to studentcasework@globalbanking.ac.uk



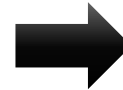
The Provost or nominee decides within 10 working days if there is a case for review. If there is a case, the Complaints Review Panel will meet within 30 working days. If there is not a case, the procedure ends, and you will receive a completion of procedures letter from GBS.



Complaints review panel upholds your complaint and determines any action(s) as a result.



You are satisfied with the outcome of the Complaints Review Panel.



END



Independent Review (External)

You are not satisfied with the Stage 3 outcome. You can request that the case is reviewed by the Office of the Independent Adjudicator for Higher Education (OIA).

GBS Stage 2 Formal Complaint Form

You need to complete this form to lodge a Stage 2 formal complaint. You should only make a Stage 2 formal complaint after you have tried to resolve the issue or issues that have caused you concern by informal means. You should submit the completed Stage 2 Formal Complaint Form to studentfeedback@globalbanking.ac.uk. You will receive an acknowledgement following the submission of this form within five working days.

Please ensure that you complete every part of this form. Normally, you should expect to receive a formal response to your complaint within fifteen working days of submitting the completed Stage 2 Formal Complaint Form.

If you have any questions or queries, please contact the Dean of Students in the first instance.

YOUR DETAILS:			
Full Name:		Student ID:	
Course of study:		Address:	
Tel:		Email:	

FOR OFFICE USE ONLY			
INVESTIGATOR DETAILS:			
Name:		Position:	
Date:		Time:	
Tel:		Email:	
Type of Complaint:			

NATURE OF COMPLAINT
<i>Please state clearly...</i>

<p><i>Please give further details about your complaint together with any evidence and/or facts that support your complaint...</i></p>
<p><i>Please indicate how you think the issues that you have raised in your complaint could be resolved to your satisfaction...</i></p>
<p><i>Please describe how you have tried to resolve your complaint by informal means...</i></p>

FOR OFFICE USE ONLY
INVESTIGATION INFORMATION & OUTCOME ACTIONS:
<p><i>Details of Investigation:</i></p>
<p>Procedure(s) Revised due to Complaint:</p>
<p>DETAILS OF ACTIONS TAKEN AND INVESTIGATION OUTCOMES:</p>
<p>HAVE THE MITIGATING ACTIONS PREVENTED THE COMPLAINT FROM OCCURRING AGAIN? <i>(Describe)</i></p>

STUDENT DECLARATION

Data Protection Act 2018- By signing this form you are also agreeing to the following: Global Banking School will process the information provided by you and your personal data for the purposes of investigating and resolving your complaint and monitoring and evaluating the effectiveness of the student complaints procedure. If you do not give your consent by signing this form Global Banking School will not be able to progress your complaint.

Please ensure that you complete each section of this form. When completed please sign and date, then submit to the Dean of Students at Global Banking School.

I confirm that the information given on this form and in supporting documents is true to the best of my knowledge and belief. I agree that my complaint may be disclosed to relevant members of Global Banking School to the extent necessary for its consideration.

I authorise the reviewer(s) of this complaint to consider this form and any relevant information held by GBS to the extent necessary for the consideration of complaint.

Student Signature **Date:**

GBS Staff Signature **Date:**

GBS Stage 3 Student Complaints Review Form

If the response issued at the conclusion of Stage 2 is not considered by you to be satisfactory, you may request a review in writing within ten working days from the date of the notification of the outcome of the Formal Complaint.

The request for review can only be considered in the following circumstances:

- The complainant has evidence that there has been a material procedural irregularity;
- That there is evidence that all of the relevant information was not considered during the informal and formal stages;
- There is additional evidence that has not previously been considered and could not reasonably have been made available at an earlier stage.

When you have completed this form, please submit it to studentfeedback@globalbanking.ac.uk.

SECTION ONE – YOUR DETAILS:

Full Name:		Student ID:	
Course of study:		Address:	
Tel:		Email:	

SECTION TWO – REQUEST FOR REVIEW

For your review to be considered you must tick at least one of the following options and provide details why you have selected this option.

<p>a) Evidence that there has been a material procedural irregularity <input type="checkbox"/></p> <p>Please give details why you have considered this and reference any further supporting documentation.</p>
<p>b) Evidence that all of the relevant information was not considered during the</p>

informal and formal stages

Please give details why you have considered this and reference any further supporting documentation.

c) Additional evidence that has not previously been considered and could not reasonably have been made available at an earlier stage

Please give details why you have considered this and reference any further supporting documentation.

What outcome are you seeking?

Details of any evidence submitted to support your request for review

SECTION THREE – STUDENT DECLARATION

STUDENT DECLARATION

Data Protection Act 2018- By signing this form you are also agreeing to the following: Global Banking School will process the information provided by you and your personal data for the purposes of investigating and resolving your complaint and monitoring and evaluating the effectiveness of the student complaints procedure. If you do not give your consent by signing this form Global Banking School will not be able to progress your complaint.

Please ensure that you complete each section of this form. When completed please sign and date, then submit to the Dean of Students at Global Banking School.

I confirm that the information given on this form and in supporting documents is true to the best of my knowledge and belief. I agree that my complaint may be disclosed to relevant members of Global Banking School to the extent necessary for its consideration.

I authorise the reviewer(s) of this complaint to consider this form and any relevant information held by GBS to the extent necessary for the consideration of complaint.

Student Signature **Date:**

GBS Staff Signature **Date:**