



Student Complaints Procedure

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025/21	Minor Editing changes – name of SSLC corrected and other grammatical errors. No need to get reapproved by Governors.	7/5/21 by Governance Group	JB
037/21	Minor wording changes in paras 10,32,70,71,73,75,77,94 & 96 Paragraphs 8 & 91 amended to include LHU Network of Hope Courses.	1/10/21	



Student Complaints Procedure

Introduction

1. The College is committed to providing students with the best possible experience and educational standards, but recognises that concerns or complaints may arise occasionally.
2. This procedure outlines the process which students should follow to raise complaints and the process through which these complaints will be considered.

What is a complaint?

3. A complaint is an expression of dissatisfaction by one or more students about action or lack of action by the College, or by an employee or representative of the College, or about the standard of service provided by or on behalf of the College.
4. A complaint is different from feedback, where students give the College their views on matters, positive or negative. There are various mechanisms where students can give feedback and make suggestions for improvements. These include module evaluations, Staff-Student Liaison Council, through Student Representatives, or taking part in surveys. Any feedback is reviewed by tutors and by the Quality Assurance Committee of the Academic Board. The College is required to give evidence of responding to such comments through reports to the Staff-Student Liaison Council which meets on a twice termly basis.

Principles

5. The College takes complaints seriously and will deal with them without recrimination and in a confidential manner. The College will ensure that students raising a complaint through this procedure will not be treated less favourably because they have raised a complaint.
6. All students and staff are expected to act reasonably, fairly and with respect, in accordance with the College's policies, during the procedure. Students raising a complaint are asked to provide full and documented evidence, engage positively with those investigating the issue and make reasonable suggestions for remedy should the complaint be upheld. Staff and students

who are asked to provide information or documents are expected to cooperate with the College in its investigation.

7. The Student Complaints Procedure is not a disciplinary procedure, although an upheld complaint may give rise to such a procedure. The College may decline to settle the complaint while any matter intrinsic to it is the subject of disciplinary or other formal procedures within the College.
8. Timescales for submission and response are stated throughout the procedure. There may be occasions when it is not feasible for a full and thorough investigation to be carried out within those normal timescales and when a longer period of time is therefore required. These may include, but are not restricted to:
 - Periods when the College is closed;
 - Periods when key staff are absent;
 - Particularly complex issues of complaint;
 - Complaints related to other procedures which may need to be completed before the complaint can be fully addressed (e.g. disciplinary matters);
 - Complaints handled in conjunction with other teaching and validation partners.
9. Where it is apparent that the stated deadlines cannot be met, the student will be informed at the earliest opportunity at which an indication of the revised deadline for response and the reasons for the delay can be given.
10. If students disclose a disability when making a complaint, reasonable adjustments will be made to the procedure to resolve any actual or perceived disadvantage.
11. Complaints will be managed confidentially, with information only being released to those who need it for the purposes of investigation or responding to the complaint. Confidentiality is a mutual obligation, and includes witnesses and those providing evidence, support or advice. The College recognises that it has a duty to balance the respective rights and obligations of students and staff. Those about whom complaints have been made have a right to know what is being claimed and who is making a complaint. Where a complaint is made through this procedure, a copy of the complaint will normally be sent to the person who is being complained about and that person will have a right to respond to the complaint and to support and representation.
12. Where a complaint is raised against a member of staff or a student, and is upheld, the student will be advised of this. However, it may not be appropriate to share specific details of action taken, especially where

disciplinary action is taken against a member of staff or a student.

13. Records will be kept throughout the complaints process.
14. It is anticipated that most complaints will be resolved through the informal process.

Who can complain?

15. This procedure applies to students who are currently enrolled on a course with Spurgeon's College or those that have recently left the College, provided the complaint is received within 60 working days of leaving.

Group complaints

16. Where a complaint affects a number of students, it can be dealt with as one collective complaint. In this case a 'Group Appeal-Complaint Consent Form' should be completed to confirm and clarify exactly which students have been materially affected by the issue and authorising the College to correspond with a single named spokesperson (Lead Student) to represent the group. The College will then only communicate with the lead student throughout the process, sending all documents and correspondence to them.
17. Once the Group Complaint Form is submitted, the College will not normally allow other students to join the group at a later date. Usually only the lead student plus one other representative from the group can attend meetings about the complaint, and they have a duty to liaise with other students in the group complaint, collecting evidence and providing regular feedback.

Third party complaints

18. Third party complaints will not normally be considered under this procedure. The College's contract is with the student; therefore, students are expected to deal with their own case, unless for good reason they are unable to do so. In exceptional circumstances where a third party does represent a student, written consent (using the Third Party Consent Form) is required from the student for this to take place and to allow for information to be shared to deal with the case.

Anonymous complaints

19. Anonymous complaints will not normally be dealt with under this procedure. Exceptionally, an anonymous complaint may be considered if the College deems that there is a serious and compelling case supported by evidence.

What does the procedure cover?

20. This procedure covers complaints where a student is dissatisfied with the delivery of teaching, support services, administration, facilities, or other aspects of the student's relationship with the College.
21. Grounds for complaint might include, but are not limited to:
- dissatisfaction with the standard of academic or service provision (e.g. course design, curriculum content and structure, assessment arrangements and information, resources and facilities, accommodation)
 - dissatisfaction with the quality of supervision or tuition;
 - issues of inappropriate conduct by a member of staff;
 - failure, on the part of the College, to meet stated obligations (e.g., those set out in the prospectus or on the website).
22. It covers services provided by other organisations on behalf of the College.
23. Where the complaint is of a general nature, it may be more appropriate for the matter to be taken up with the Student Representatives and issues arising from the complaint can then be raised with the appropriate member of College staff.

Matters not dealt with under the Student Complaints Procedure

24. This procedure does not cover complaints which:
- have already been considered;
 - are submitted outside of the timescales;
 - are outside the scope of this procedure;
 - have been finalised by a court, tribunal or settlement agreement;
 - are malicious or frivolous;
 - are repetitive or harassing.
25. Examples of frivolous or malicious complaints include:
- complaints which are obsessive, harassing or repetitive;
 - insistence on pursuing non-meritorious complaints and/or unrealistic, unreasonable outcomes;
 - insistence on pursuing meritorious complaints in an unreasonable manner;
 - complaints designed to cause disruption or annoyance;
 - demands for redress which lack any serious purpose or value.
26. The College may terminate consideration of a complaint if it considers it to be frivolous or malicious. In such cases the College will write to the student

explaining why it is terminating consideration and advising the student of their right to appeal.

27. This procedure does not cover any of the following:

- Matters relating to examination and assessment performance and academic judgement;
- Academic appeals against decisions by the Progression and Awards Board (see Academic Appeals Procedure);
- Matters covered by the Academic Malpractice Policy and Procedure;
- Staff grievances (see Grievance Procedure for Staff);
- Matters covered by the Whistleblowing Policy;
- Freedom of Information matters;
- Data protection matters;
- Complaints relating to the admissions process (see Admissions Appeal Procedure);
- Complaints about student conduct (see Student Conduct and Disciplinary Procedure or Fitness to Practise Procedure);
- Complaints relating to Disclosure and Barring Service (DBS) checks;
- Matters which are the subject of criminal investigation or legal proceedings until such time as those proceedings are concluded;
- Matters relating to decisions of the Student Loan Company;
- Bullying and harassment by another student (see Anti-bullying and Harassment Policy for Students).

Outline of the procedure

28. The Student complaints procedure has three stages:

- Stage 1- Informal Early Resolution Stage
- Stage 2 - Formal Stage
- Stage 3 - Review Stage

Stage 1 Informal Early Resolution

Time limits for Stage 1

29. A complaint must be raised within 60 working days of the event or circumstances which are its cause. If the complaint relates to a long term or ongoing issue, the student should notify the complaint within 60 working days from when the issue first affected them.

30. The College does not routinely extend time limits for making complaints. If there are exceptional reasons for making a late complaint the College may use its discretion to accept it outside normal time limits. The student must have evidence to support the reasons for making a late complaint.

31. The stage 1 review will normally be completed within 15 working days of the complaint being notified, and the College will normally respond to the student in writing within 20 working days of the complaint being notified.

32. If these deadlines cannot be met, then the student will be informed of the reasons for the delay and the timescale for receipt of a full response.

Procedure for Stage 1

33. In accordance with the ethos of the College, it is expected that complaints should normally be dealt with informally by discussion between the parties involved.

34. In most cases, therefore, initial contact should be made with the relevant member of staff who is responsible for dealing with the matter being complained about. For example, if the complaint refers to an academic matter, the first point of contact should normally be the Unit Tutor, Pastoral Tutor or Programme Lead. A complaint may also be informally raised with another senior member of staff.

35. Initial contact can be by a spokesperson on behalf of a group including by a Students' Representative (and at this stage of the procedure would not require a signed statement from the individuals concerned).

36. Where the subject of the complaint raised lays outside of the remit of the staff member with whom it has been raised, they may seek the advice of a senior member of staff who may determine that a more appropriate member of staff should investigate the concern.

37. In order that a complaint is dealt with effectively and efficiently, it should be drawn to the attention of the relevant member of staff as soon as possible and in any event within the time limits stated above.

38. The student should make initial contact in writing or by email to request an appointment to discuss the matter. This email/letter should be entitled 'Complaint' and should include an overview of the complaint. This makes it clear the student wishes to complain rather than just give feedback and will help the member of staff concerned to deal with the complaint efficiently.

39. The student should:

- be specific about the problem;
- describe the problem succinctly;
- provide supporting documentary evidence where available and appropriate;
- state the outcome requested – be clear and realistic.

40. At this stage, the relevant member of staff will normally make an appointment to discuss the complaint with the student and other persons involved, and make any other enquiries they see fit to determine whether it can be resolved.
41. Staff should use the 'Stage 1 Student Complaints – Information Gathering Form' to record the details of the complaint. Students should be asked to sign this form to agree it as an accurate record of the conversation.
42. Where resolution proves difficult, external mediators may be mutually identified to bring independent expertise. This process can be accessed through Student Representatives in consultation with the Chief Operating Officer (COO) or their nominee.
43. Resolution may be achieved in a number of ways, for example by providing:
- A solution;
 - Information, advice and/or an explanation as to why the issue occurred;
 - Assurances of what action will be taken to prevent a recurrence;
 - An apology.
44. A written record of the outcome will normally be sent to the student within five working days of completion of the investigation. All paperwork should be sent to the COO for reporting purposes and to enable any trends to be identified. Any actions recommended to improve the effectiveness of the College will be reported to the Academic Quality Assurance Committee (in the case of actions relating to Academic matters) and/or the Senior Management Team for further consideration.

Stage 2 Formal Procedures

45. If the student is dissatisfied with the outcome of informal procedures and wishes to pursue the matter formally, or if the College has deemed that it is not appropriate to consider the issue informally (e.g. where the complaint is serious or requires detailed investigation), the student may wish to progress to stage 2.

Submission of a formal complaint – Stage 2

46. A stage 2 complaint must be submitted in writing using the Stage 2 Complaints Form (available on Moodle under Academic Administration) and should be sent via email to the COO. The COO may nominate another appropriate senior member of staff to act on their behalf.
47. The form requires the student to:
- Outline the nature of the complaint;
 - Outline the informal steps already taken at Stage 1;

- Explain why the student is dissatisfied with the response at Stage 1;
- Explain the outcome that the student is seeking in order to resolve their complaint;
- Submit all relevant evidence or documentation e.g. copies of relevant letters, e-mails, and signed witness statements.

48. Where complaints are raised collectively at this stage, the complaint should include a 'Group Academic Appeal/Complaint Consent Form' to confirm all students that have been materially affected by the issue and authorising the College to correspond with a single named spokesperson.

Time limits for Stage 2

49. The form/s should be submitted to the COO no later than 10 working days from the date on which the Stage 1 response was provided.

50. In the event of immediate consideration at Stage 2, the formal complaint form should be submitted no later than 60 working days after the event or circumstances which are its cause. If the complaint relates to a series of events, the complaint should be notified within 60 working days from when the issue first affected them.

51. The College does not routinely extend time limits for making complaints. If there are exceptional reasons for making a late complaint the College may use its discretion to accept it outside normal time limits. The student must have evidence to support the reasons for making a late complaint.

52. It is anticipated that most Stage 2 complaints will be completed within 30 working days of the appointment of the Investigating Officer. If there is any delay in this process (or example due to College closure, staff leave or the complexity of the complaint) then the student will be notified.

Procedure for Stage 2

53. Upon receipt, the COO (or nominee) will:

- acknowledge receipt of the form by email;
- check that the complaint falls within the scope of the Student Complaints Procedure;
- check whether it is appropriate to refer the student to a different procedure;
- check that the complaint has been submitted within the appropriate time limits;
- determine whether a resolution was attempted at the informal stage of the procedure and if not, determine if the matter can/should be referred back to Stage 1;
- check that the complaint is clearly outlined.

54. If it is appropriate for the complaint to progress, the COO (or nominee) will identify a member of staff to investigate the complaint. The Investigating Officer will have no material interest in the complaint and will not have been involved with the matter under consideration. The Investigating Officer will ordinarily work with another person of the same or higher seniority who will assist them. Where the complaint directly relates to a member/s of staff, the Investigating Officer will normally be at the same level or more senior than the staff involved. Where the complaint involves a Head of Department, the Investigating Officer will be the Principal. Where the complaint involves the Principal, a Governor of the College will be asked to investigate.
55. The student will be advised of the name and contact details of the Investigating Officer. The complaint form and related documentation will be sent to the Investigating Officer as soon as possible to enable them to carry out their role.
56. If the matter concerned does not fit within the scope of the Complaints Procedure then the COO (or nominee) will advise the student in writing within 5 working days of receiving the Stage 2 Complaint Form.
57. The Investigating Officer will investigate the complaint using the 'Guidelines for Investigating Officers', and will produce a written report with appropriate evidence and recommendations, using the 'Investigating Officer's Report Form'.
58. They will normally meet or communicate with the student to discuss the matter in further detail. The investigation will also involve a review of relevant documentary evidence. Any documentary evidence supplied by the student or other persons will normally be provided to both parties, unless the Investigating Officer considers there is an exceptional case to maintain confidentiality.
59. The Investigating Officer will consider whether it would be appropriate to seek to resolve the complaint by means of an alternative dispute resolution process, for example mediation.
60. Once the investigation has been completed, the report will be sent to the appropriate officer. This is usually the COO (or nominee). Where the complaint involves a Head of Department or the Principal, the report will be sent to a nominated Governor who has not been involved in the process.
61. The appropriate officer may request further information. Following consideration of the report, the decision of the appropriate officer will be that:
- the complaint is upheld;
 - the complaint is upheld in part;
 - the complaint is not upheld.

62. Where a complaint is upheld, the appropriate officer has the authority and discretion to consider any reasonable option to resolve the complaint. Remedial actions may include, but are not limited to, an apology, a review of College policies or procedures, or a recommendation to implement other relevant procedures e.g. disciplinary.
63. When the investigation is concluded, the student will be informed of the outcome of the complaint in writing. This will include a summary of the facts as found by the Investigating Officer, the decision, clear reasons for that decision, and any remedial actions arising from that decision.

Stage 3 Review

64. If a student is dissatisfied with the outcome reached at Stage 2, they can request a review of the Stage 2 decision. A Stage 3 review may only be invoked once Stage 2 has been completed. No new issues of complaint may be introduced at Stage 3.

Submission of request for a Stage 3 Review

65. The request for a review should be submitted using the Stage 3 Complaint Review Form. The review is not a re-investigation of the complaint and will be carried out by Complaint Review Panel.
66. The completed form should be sent to the COO.
67. The grounds for review are:
- that there was a procedural irregularity at Stage 2 of the Student Complaints Procedure which has materially disadvantaged the student;
 - the emergence of new and relevant evidence which, for good and reasonable cause, was not available during Stage 2;
 - that evidence is available to show that the outcome reached at an earlier stage was unreasonable. In this context, unreasonable shall be taken to mean perverse, i.e. that the outcome was not a possible conclusion which a similar process of consideration might have reached.
68. At Stage 3, the following information is required:
- the grounds on which the request is based (see above);
 - a rationale to explain the grounds;
 - a statement to explain why the student is dissatisfied with the Stage 2 response;
 - the outcome sought by the student in order to resolve the complaint;
 - any relevant evidence e.g. copies of letters, emails, signed witness statements and any other relevant supporting documentation.

Time limits for Stage 3

69. The completed Stage 3 Review Form should be submitted to the COO by email no later than 10 working days from the date on which the Stage 2 response to the complaint was provided. A decision regarding the validity of the request for a review will be notified to the student in writing within five working days of receipt.

Documentation required for Stage 3

70. As a minimum the following will be provided to the Complaint Review Panel meeting:

- the Stage 3 complaint form and any related documentation
- the Stage 2 complaint form, outcome letter and investigators report.
- written response following Stage 1 review of the complaint where available.

71. Documentation will be circulated to all parties at least five working days prior to the Complaint Review Panel meeting.

Procedure for Stage 3

72. On receipt of a Stage 3 Complaint Review Form the COO will review the documentation to determine whether the request for a review is valid. If the request is deemed invalid a letter will be sent to the student to advise them that the internal College procedures in relation to the complaint have been concluded. This letter will include details of the review procedures of any validating University as well as the scheme of the Office of the Independent Adjudicator.

73. If the request for a review is valid, then the review will be carried out by a Complaint Review Panel (the Panel) comprising four members as follows: A Governor who will act as Chair; the Principal; a senior member of staff; and a Student Representative. Members of the Panel must have no vested interest or previous involvement in the complaint, and as such membership may be varied as appropriate. A Panel will normally be convened within 20 working days of their appointment.

74. The Panel will review the case and may request further information from the student or Investigating Officer. The Panel will consider whether, in particular, the relevant procedures were followed, the outcome was reasonable in all the circumstances, clear reasons were given for the outcomes, and there are valid reasons for the late submission of new evidence.

Review Hearing

75. The student will be given 10 working days' notice of the date and time of the Complaint Review Panel meeting and will be invited to attend the meeting to present their case. Where the student does not attend, the Panel may proceed in the student's absence.
76. The student may be accompanied to the meeting by a fellow student, member of staff or a Student Representative. Their role is one of support, and the Student will normally be expected to present their own case.
77. The COO or other appropriate officer designated at Stage 2 will be required to attend the Complaint Review Panel meeting. The Panel may also call other members of staff with knowledge of the issues raised in the complaint to attend the meeting of the Panel or to supply it with information prior to, or after, the meeting. The members of staff attending should be given 10 working days' notice of the meeting.
78. The paperwork for the meeting should include any material submitted by the student or that has been collected prior to the notice of the meeting. This may include details of witnesses to be called by both the complainant and the Investigating Officer, together with a brief statement giving the purpose of the attendance of the witnesses.
79. All documentation should be submitted to the Chair not less than seven working days before the meeting of the Panel, and circulated to Panel members, the complainant, and where appropriate the individuals against whom the complaint is being made, not less than five working days before the meeting of the Panel.
80. The process of the Panel Meeting is as follows:
 - Chair will ensure that introductions are made and the role of each person present is clear and will outline the process;
 - Chair will invite the student to outline the reasons for the review;
 - Chair will invite the COO/appropriate officer to respond to any of the issues raised by the student;
 - The Panel may ask questions of the participants;
 - The student and the COO/appropriate officer may call witnesses to present evidence;
 - The Panel, student and the COO/appropriate officer may question the witness(es);
 - Any questions for the witness(es) will be addressed through the Chair;
 - Witnesses withdraw once their evidence has been heard and there are no more questions;

- Commentary deemed by the Panel to be irrelevant, frivolous or vexatious will not be recorded;
- Both the student and the COO/appropriate officer will have the right to make final submissions to the Panel.
- The student and the COO/appropriate officer will be asked to withdraw whilst the Panel considers the evidence and reaches a decision.

81. It is the responsibility of both staff and students to ensure that any witnesses whom they wish to call in support of their complaint are available for the meeting of the Panel and are briefed as to the arrangements for the Panel.

82. After oral statements have been made, the meeting will close, and the Panel will retire to make a decision in private.

Stage 3 Notification of Decision Process

83. The Panel will consider all relevant information and determine whether the investigation has been carried out fully and in line with these procedures. They will also consider whether the decisions and outcome were reasonable in the circumstances.

84. The Panel will decide, on the balance of probabilities, either:

- That one or more of the grounds for appeal are met, in which case the appeal is upheld or partially upheld; or
- That no ground for appeal is met, in which case the appeal is rejected, and the previous decision will stand.

85. In the event that the Panel does not reach a consensus, the Chair will take the final decision. Exceptionally the Chair of the Panel may need to undertake further consultation before a decision can be reached.

86. Where the Panel upholds or partially upholds the appeal it will consider possible means of redress. Remedial actions may include, but are not limited to, a reconsideration of a decision made under the Colleges' policies or procedures, the application of another College policy, a review of College policies and procedures, or staff training.

87. The student will be informed of the outcome of the review, in writing, normally within 5 working days of the Review Hearing. The student will be given reasons for any decision reached. The decision letter will include a Completion of Procedures (COP) letter. This letter should advise the student of their right to independent review. Students may also request a Completion of Procedures letter at the end of the formal stage if they choose not to progress the matter to the review stage.

Overall time limits to complete Stage 2 and Stage 3

88. If the complaint is considered at both Stage 2 and Stage 3, the College will aim to complete both stages within **90 working days**. This time limit starts on the date the completed Stage 2 Complaint Form is received.
89. Investigators and reviewers aim to provide a response within the 90-day time limit stated. There will occasionally be circumstances when this is not possible. In those cases the College will notify the student of the reason for the delay and advise them of the date they can expect a response will be sent.

Independent Review

90. There are no other complaint procedures within the College beyond those detailed above. Students who believe that their case has not been dealt with properly by the College or that the outcome is unreasonable may request a review.
91. Students registered with validating Universities can request a review of their appeal as follows:
- Liverpool Hope University registered students can request a review of their complaint by sending a Stage 3 Complaint Form (Request for a Review) to caseworker@hope.ac.uk within 10 days of the final decision of the College.
 - Students who are enrolled on University of Manchester validated courses, may also write to the Director of Teaching and Learning Support of the University (appealsandcomplaints@manchester.ac.uk) to request a review in connection with the complaint if they feel that their case has not been handled properly or that the decision reached was not reasonable based on the evidence available. The University must receive a review request within 10 working days of the date on which the College formally notified the student of its decision.
92. If a student is still not satisfied then they may be able to complain to the Office of the Independent Adjudicator for Higher Education (OIA) if the complaint is eligible under its rules. Further information and the procedure for submitting complaints can be obtained from the OIA website: www.oiahe.org.uk.

Attendance at meetings and engagement with the Process

93. Students are encouraged to attend all meetings convened under this Procedure to consider a complaint. If a student does not attend a meeting under this Procedure, without providing good reason in advance, the relevant officer may decide that the meeting may proceed in the student's absence. In this instance, the complaint will be considered on the basis of

the evidence available at the time of the meeting. If, for good reason, a student is unable to attend a meeting under the procedure, then the student may request that the meeting is deferred until a later date. Alternatively, the student may request permission from the College for their representative to attend the meeting to present the case on the student's behalf. This may delay the time taken to reach an outcome to the complaint.

94. A student is responsible for paying the costs of their attendance at meetings.
95. At any stage of the procedure, in the event that a student raises a complaint and then does not engage with the process of investigating and/or determining a way to resolve the issue, the complaint process will be formally discontinued, and the student notified as such.

Representation at meetings

96. A student may be accompanied at any meeting under this procedure by a representative, who would normally be a fellow student, Student Representative or a member of College staff. Their role is one of support, and the student will normally be expected to present their own case. The representative must not be someone who has been suspended or excluded from the College for any reason and they must be willing to act in the capacity as the student's representative. Legal representation is not permitted. It is the student's responsibility to relay all relevant notices and other communications under this procedure to their representative.
97. A member of staff against whom a complaint has been made and who has been called to a meeting in relation to the complaint will also have the right to be accompanied by a member of College staff or a recognised Trades Union Official. Legal representation is not permitted.
98. The name of the representative should be provided to the College before any meeting. Where a representative is attending a meeting on behalf of a student or member of staff, the meeting will only be required to consider the representations made by the representative during the meeting. Any written or oral representations made by the representative after the meeting cannot be considered.
99. A student is responsible for paying the costs of their representative.

Recording of Procedures

100. The audio recording of meetings held under this procedure is prohibited, subject to any reasonable adjustment that may be agreed by the College where required under the Equality Act 2010.

Legal Proceedings

101. If a student brings court or tribunal proceedings against the College which may be relevant to that student's complaint, the College will normally suspend consideration of the complaint until they know the outcome of those proceedings. If the matters complained about are disposed of in those proceedings then the College will normally terminate consideration of that complaint.

Appointment of Substitutes

102. If any post-holder of the College who is specified in this procedure for any reason is unable to take action that is their responsibility under this procedure (for example due to a conflict of interest, or absence), then the Chief Operating Officer (or nominee) is able to approve the appointment of a substitute who will be as close as possible to the specified post holder in terms of their position within the College.

Disciplinary Action

103. Students should note that disciplinary action may be taken against them if they offer or give any College staff money, gifts, threats or any other advantage which is intended to induce or reward impropriety in the consideration or resolution of a complaint.
104. Any information submitted as part of a complaint which is subsequently identified as fraudulent/vexatious or malicious will be disregarded and the student may be referred for consideration under the Student Conduct and Disciplinary Procedure or Fitness to Practise Procedure.

Reporting

105. Each year, the COO will prepare an anonymised report for the Governors and the Staff Student Liaison Council on the number and nature of complaints. This will also include any corrective action implemented as a result of any upheld or partially upheld complaints.
106. Documentation relating to a formal complaint brought by a student will be retained for six years in accordance with the College's Records Retention Schedule.