

# STUDENT COMPLAINTS

# PROCEDURE

Approved by Senate in July 2024

## Contents

<b>STUDENT COMPLAINTS</b> .....	1
<b>PROCEDURE</b> .....	1
Approved by Senate in July 2024 .....	1
Figure 1. Student Complaints Procedure .....	3
1. Introduction and scope .....	4
Complaints about other St George’s Students .....	5
Matters Not Covered under the Student Complaints Procedure .....	5
The Office of the Independent Adjudicator .....	6
Support Services .....	7
Third Party requests .....	7
Reasonable adjustments .....	7
Procedural exemptions .....	8
2 Behavioural Expectations .....	8
3 Confidentiality and General Data Protection Regulations .....	8
4 Burden of proof .....	9
5 Standard of proof .....	9
6 Initial (informal) stage .....	9
7 Second (formal) stage .....	9
Investigation .....	10
Examples of remedies .....	10
Vexatious complaints .....	10
Complaints concerning members of staff .....	10
Outcomes available .....	11
8 Complaint Review Panels .....	11
Membership of a Student Complaint Panel .....	12
Procedure .....	12
Outcomes available .....	12
9 Record Keeping .....	13

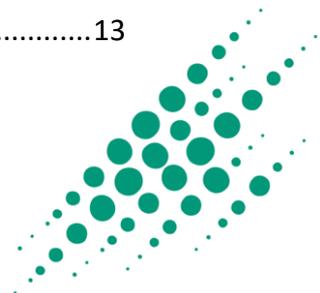
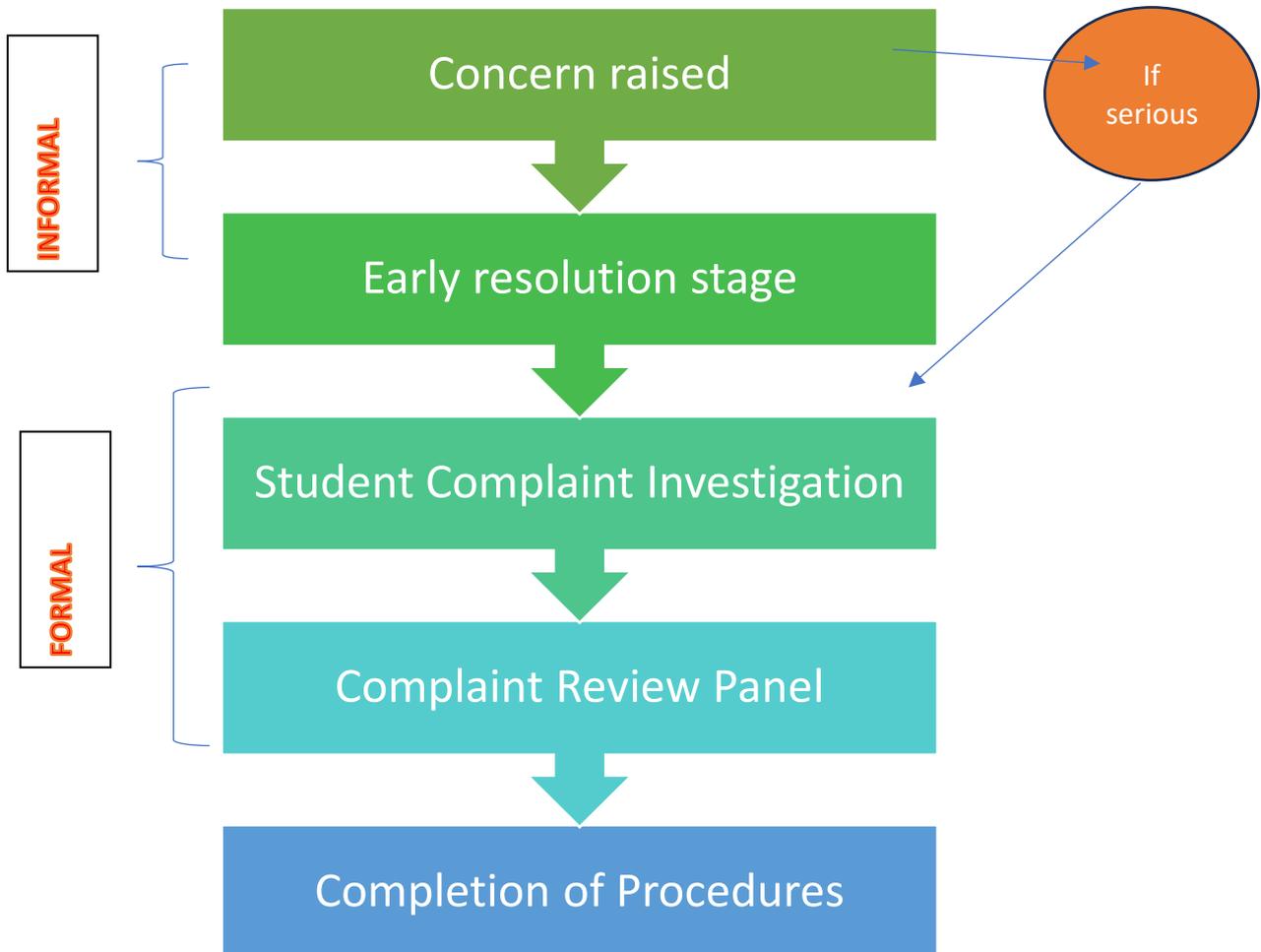
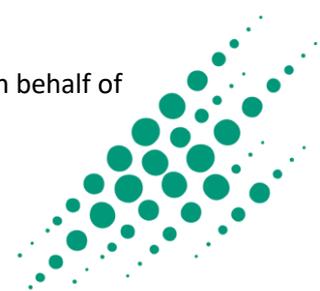


Figure 1. Student Complaints Procedure



## 1. Introduction and scope

- 1.1 This procedure is prescribed by Council in accordance with paragraph 21.2 of [the General Regulations for Students and Programmes of Study](#).
- 1.2 This procedure applies to students and recent students of St George's, University of London. The term 'student' includes those registered or enrolled on a programme. It includes those on an interruption of study or suspension and those who left the University within a period of three calendar months.
- 1.3 In this procedure, any named officer may delegate their responsibilities to another member of SGUL staff; similarly, the procedure shall not be invalidated by an officer of SGUL acting in the place of another named in these regulations where circumstances make this expedient.
- 1.4 The Academic Registrar or his/her nominee (normally the Student Conduct and Compliance team (SCC)) is responsible for providing guidance to students and others on the operation of this procedure.
- 1.5 The Academic Registrar or his/her nominee may reject any complaint which is frivolous (i.e. repetitive and burdensome), vexatious (i.e. brought with malicious intent), or lacking substance (i.e. unsupported by evidence).
- 1.6 In this procedure, a complaint is defined as '*an expression of dissatisfaction by one or more students about the University's action or lack of action, or about the standard of service provided by or on behalf of St George's, University of London (SGUL)*'. Examples of complaints may include:
  - failure by the university to meet obligations including those outlined in course/student handbooks or a student charter.
  - misleading or incorrect information in prospectuses or promotional material and other information provided by the university.
  - concerns about the delivery of a programme, teaching, or administration.
  - poor quality of facilities, learning resources or services provided directly by the university.
  - complaints involving other organisations or contractors providing a service on behalf of the university.



- 1.7 A student may raise issues which do not fall neatly under one procedure. In this circumstance, the student will be informed whether the matters will be considered together or under two separate procedures, and whether one procedure may be put on hold pending completion of the other procedure.
- 1.8 The University is committed to providing a fair, consistent, and accessible service. The University believes that everyone who interacts with it has the right to be heard, understood, and respected. The University believes that its staff have the same rights, and the University must provide a safe working environment for its staff. The University must also ensure the efficient and effective operation of its work, so that it can provide a good service to everyone. Students are expected to abide by the [Student Behavioural Code of Conduct 2023 \(sgul.ac.uk\)](https://www.sgul.ac.uk/student-behavioural-code-of-conduct-2023). Students are responsible for their own behaviour and that of their supporter or representative. Abusive or disrespectful behaviour towards University staff will not be tolerated under any circumstances and may result in internal procedures being brought to a close.

### Complaints about other St George's Students

- 1.9 In the spirit of collegiality, students who wish to complain about the actions of another student are expected to make reasonable attempts to resolve personal disagreements and be able to demonstrate that they have done so in the first instance before bringing the matter as a complaint to the University.
- 1.10 Where there are circumstances that make it difficult or inappropriate for student(s) to resolve complaints about another student, advice should be sought from a Personal Tutor, Students' Union President of Welfare or Students' Union Education & Welfare Support Officer in the first instance.
- 1.11 St George's reserve the right to refer a complaint back to students if such informal attempts have not been made and/or if advice regarding available sources of support has not been taken.
- 1.12 The Academic Registrar or his/her nominee shall, if they considers it appropriate, investigate the matter and take appropriate action, which may include dealing with the student complained about under another appropriate procedure, such as the student disciplinary or fitness to practise/study processes.

### Matters Not Covered under the Student Complaints Procedure

- 1.13 This Procedure does not apply to dissatisfaction with the following areas:

**The imposition of precautionary measures.**

**Complaints from applicants for programmes of study.**

- 1.14 This procedure does not apply to applicants to St George's. Applicants to St George's programmes who are dissatisfied with admission decisions may, where circumstances allow,



lodge a complaint under the Admissions Complaints Procedure. Complaints about admissions decisions should be addressed to the Senior Admissions Officer in the first instance at [admissionscomplaints@sgul.ac.uk](mailto:admissionscomplaints@sgul.ac.uk).

### **Complaints about decisions of Boards of Examiners (Academic Appeals)**

- 1.15 Complaints about, and requests for review of Board of Examiners decisions are considered only on strictly limited grounds set out in paragraph 14 of the General Regulations for Students and Programmes of Study, and in accordance with the separate prescribed 'Academic Appeals Procedure'.

### **Complaints about Student Union Societies and Events**

- 1.16 St George's Students' Union operate separate policies for the regulation of student activities which fall under their jurisdiction (the 'Regulation for Complaints' and 'Regulation for Discipline' Policies). Such matters should be referred to the Students' Union President or to another Senior Officer of the Students' Union if the complaint relates specifically to the conduct of the President.

### **Outcomes of the following processes**

- 1.17 extenuating circumstances,  
academic integrity,  
disciplinary matters,  
withdrawal of visa sponsorship,  
DBS and internal disclosures policy,  
fitness to practice/study.
- 1.18 A complaint will not be considered where the substance of the complaint can be shown to relate to a matter that has already been the subject of a complaint by the student that is either in progress or has already been concluded.
- 1.19 SGUL will not normally review a formal complaint about something which has already been, or is currently, the subject of legal proceedings in a court or tribunal unless those proceedings have been put on hold.

## The Office of the Independent Adjudicator

- 1.20 The Office of the Independent Adjudicator for Higher Education (OIA) runs an independent scheme to review student complaints. SGUL is a member of this scheme. Students who are unhappy with the outcome may be able to ask the OIA to review their case. Students can find more information about making a complaint to the OIA, what it can and cannot look at and what it can do to put things right here: <https://www.oiahe.org.uk/students>. Normally, students need to follow the process set out in this procedure before they complain to the OIA.



SGUL will send a letter called a “Completion of Procedures (COP) Letter” when students have reached the end of the complaints processes and there are no further steps they can take internally. Students can find more information about COP Letters and when they should expect to receive one here: <https://www.oiahe.org.uk/providers/completion-of-procedures-letters>. It is expected that students, their representatives and staff act reasonably and fairly towards each other and treat this process with respect. A failure to respect this process may result in a disciplinary/fitness to practise investigation.

## Support Services

1.21 Support is available from a variety of services on campus. These include:

- Students’ Union: <https://www.sgul.ac.uk/for-students/students-union>  
Students subject to this procedure may wish to obtain guidance and support from the President of Education and the President of Welfare of the Students’ Union
- Personal tutor(s)
- Disability Service: <https://www.sgul.ac.uk/for-students/student-support/disability-service>
- University’s Counselling Service: <https://www.sgul.ac.uk/for-students/student-support/health-and-wellbeing/mental-health/counselling-service>. who can provide comprehensive and confidential support to anyone experiencing difficult circumstances (counselling@sgul.ac.uk):
- Occupational Health: <https://www.sgul.ac.uk/for-students/student-support/health-and-wellbeing/occupational-health>

1.22 In instances where students wish to bring a complaint about the general standard or delivery of teaching or project supervision to attention of their Course Team, students should approach their **Student Year Representatives** without delay who are able to raise concerns through the appropriate Course Management Committee.

1.23 If you are unsure who to speak to about your complaint or concern, please contact the Students’ Union in the first instance.

## Third Party requests

1.24 Students are advised to respond to all communication from the University (verbal and written) directly and not normally through a third party except in exceptional circumstances where diagnosed disability reasonably prevents them from being able to do so.

## Reasonable adjustments

1.25 Reasonable adjustments to the processes within these procedures, including the extending of deadlines for student responses, may be made upon the production of relevant third-party evidence by the student which demonstrates the need for those adjustments. Students who



believe they may require reasonable adjustments due to disability/long-term condition/accessibility needs should also contact the [Disability Service](#) for additional support.

### Procedural exemptions

- 1.26 In exceptional circumstances it may be appropriate to amend this procedure, for example, where strict application of this would result in substantial unfairness to the student, or the student is in some way at risk because of health or disability. Such cases will be rare, and each will be treated on their own merits.

## 2 Behavioural Expectations

- 2.1 Where students wish to bring a group concern, petition or complaint to the University, the complainants should nominate a spokesperson for the group with whom the University will address all correspondence under the Procedure. The spokesperson is responsible for consulting with the other complainants to represent the shared views of the group and is responsible for communicating the outcome of the complaint to the other complainants.
- 2.2 St George's will not allow the victimisation of complainants or their unfavourable treatment.
- 2.3 St George's recognises that complaints may be brought with mischievous or malicious intent, and that this may provide grounds for disciplinary action against individuals which may include suspension or expulsion.
- 2.4 In instances where complaints are raised anonymously, complainants should be aware that fair and effective investigation may be limited and may result in it not being possible to take action. St George's encourages complainants to give their name.
- 2.5 Students are responsible for their own behaviour and that of their supporter or representative. Abusive or disrespectful behaviour towards University staff will not be tolerated under any circumstances and may result in internal procedures being brought to a close.

## 3 Confidentiality and General Data Protection Regulations

- 3.1 In student complaints processes, the University limits access to sensitive personal information to those who require it to enable the issue to be investigated and/or who need it to support the student. The University collects and processes a variety of personal data in order to fulfil relevant student regulations and policies (see the [Regulations](#) web page for a list of all Student Regulations). This personal data may be provided by the student or collected from other departments within the University or taken from publicly available sources such as social media. The University processes personal data for this purpose in its legitimate interests. Some



Regulations will require the sharing of sensitive personal data (defined as “special category” data by data protection legislation). The University processes and shares special category data in the substantial public interest and only where it is necessary to enable the University to fulfil its duties of care to the student, other students, or to safeguard third parties. More detail on the types of data collected and how it is used to meet this need can be found in the [Student Privacy Notice](#).

## 4 Burden of proof

- 4.1 When making a complaint or a request to review a complaint outcome it is for the student to show how the circumstances of which they have complained have affected them and their studies.

## 5 Standard of proof

- 5.1 The standard of proof applied is that of the balance of probability; that on the evidence put forward, it is more likely than not that something was or was not the case.

## 6 Initial (informal) stage

- 6.1 As far as practicable, complaints should be handled at an informal or semi-formal level in order to resolve problems quickly and simply with the minimum of disruption to the individuals and SGUL’s main activities.
- 6.2 A student making a complaint will find it helpful to keep a note of the attempts they have made to have the matter addressed, when they made approaches, and to whom they spoke.
- 6.3 If the complaint is course related, students must discuss the issue with their Course Team and this will initially be dealt with in an informal manner.
- 6.4 If the complaint is service related, students must discuss the matter with the person or persons providing the service i.e. Library manager, Halls of Residence Manager, etc.
- 6.5 If, following the raising of a complaint/concern at this stage, the student receives a response and is satisfied with the outcome then the complaint is deemed to be closed. If the student is not satisfied with the outcome, they may proceed to Stage two (formal)

## 7 Second (formal) stage



## Investigation

- 7.1 Serious concerns regarding a student's conduct shall be formally reported to the SCC Team who will appoint an independent Investigating Officer (IO) to investigate the case under this procedure. When conducting the investigation, the IOs shall refer to the [IO protocol](#).
- 7.2 Students must fill out and submit a complaint form within 3 months of the issue that they are complaining about took place. In completing the complaint form, the student identifies the area complained about and states the nature of their complaint. They will need to demonstrate that Stage one has not led to resolution. Former students should state why the complaint was not raised during the time they were a student. Using the form the student should state and describe:
- (i) the poor service that is the focus of the complaint;
  - (ii) how often the poor service has been experienced, with dates and times;
  - (iii) the effect of the poor service on the student;
  - (iv) the nature and number of their attempts to bring their complaint to the attention of the university;
  - (v) why the outcome of Stage one is not acceptable.
  - (vi) Specify the remedy they are seeking.

**If there is no indication that local resolution has been tried as described at Stage one, the complaint will normally be returned to the student to raise it with the relevant area.**

## Examples of remedies

- 7.3 A remedy might take the form of:
- an apology
  - official acknowledgment that poor service was provided and a statement of how the University will make recompense (for example, by refunding charges for a service or facility that did not work as it should have done)
  - agreement to review or amend how the University provides a service or conducts a procedure

## Vexatious complaints

- 7.4 If SCC Team consider that a formal complaint is vexatious (i.e. brought with malicious intent), or frivolous (i.e. repetitive or burdensome), they, either before or after appointing an IO, reject the complaint with reasons given in writing. The student would have the right to appeal this decision as per section 8.

Complaints concerning members of staff.



7.5 Where a complaint concerns the behaviour of members of staff, the IO will seek advice from the University's Human Resources Department on how to handle that aspect of the complaint. This may result in the complaint being referred to the Human Resources Department for consideration under the relevant HR policies and procedures.

#### Outcomes available

7.6 The investigation shall normally be concluded within 30 University working days, except in complex cases where it may take longer. The student will be kept updated about any delays to the investigation.

7.7 The IO has the authority to reach the following outcomes:

- (i) **Outcome 1:** That the complaint is **not justified** and that no further action necessary.
- (ii) **Outcome 2:** That the complaint is **partly justified**.
- (iii) **Outcome 3:** That the complaint is **fully justified**.

7.8 If the IO established, on the balance of probabilities that **outcomes 2 or 3** apply they will recommend appropriate remedies as stated in paragraph 7.3.

7.9 If a student is issued with an **Outcomes 1 or 2**, they have the right to request a review of the IO decision, as per section 14 of this procedure.

## 8 Complaint Review Panels

8.1 A complainant who is not satisfied with the action taken and/or decision taken at stage 2 may appeal the decision on the following grounds:

- that the Investigating officer failed to follow the University's regulations and/or procedures or failed to follow them with due care
- that the Investigating Officer has shown bias or prejudice towards the student in the way that they have handled the complaint
- that relevant new evidence has become available that should be considered and there are valid reasons why it was not presented earlier
- that the decision of the Investigating Officer was unreasonable and/or the outcome was not proportionate in all of the circumstances

8.2 Requests shall be made in writing via [scc@sgul.ac.uk](mailto:scc@sgul.ac.uk) within 10 working days of the date of the stage 2 outcome letter.

8.3 Complaint Review Panels are normally convened by the SCC Team on behalf of the Vice-Chancellor/ President and shall act with the authority of Senate and Council.

8.4 The student is not normally invited to attend the panel and must submit any representations they wish to be considered in writing to [scc@sgul.ac.uk](mailto:scc@sgul.ac.uk).



## Membership of a Student Complaint Panel

8.5 The Panel shall consist of members who have not previously been concerned in the case or have provided pastoral care for the student. All Panel members should receive appropriate training for the role:

- a member of staff from the pool of trained Chair persons
- members of university staff

8.6 A member of the SCC Team attends as Facilitator to support the Panel.

8.7 The IO may be invited to present the findings to the Panel as Presenting Officer.

## Procedure

8.8 The University will aim to conclude this stage of the procedure within 30 University working days. Complex cases may take longer, and the student will be kept informed of the progression of their request. SCC will write to the student with:

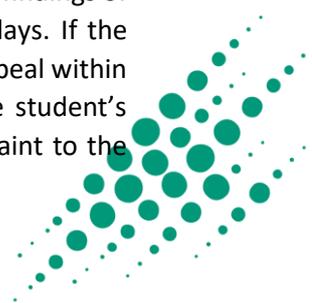
- information about the proposed membership of the Panel that will meet to review their complaint
- the date proposed for the meeting
- an outline of the procedure the Panel will follow
- a copy of the documentation to be considered by the Panel

## Outcomes available

8.9 The Complaint Review Panel may come to one of four findings:

- that the complaint should be **upheld** and a **remedy suggested**.
- that the complaint should be **upheld** and the Dean or the Director of the relevant service asked to ensure that the subject of the complaint is addressed. For a complaint that is upheld about one or more members of University staff, the Panel will consider whether to refer the matter to the University's Human Resources Department for consideration under the relevant HR policies and procedures;
- that the complaint should be **rejected**.

8.10 Following the meeting of a Complaint Review Panel, the SCC facilitator conveys the findings of the Panel to the student and all relevant parties in writing within five working days. If the student remains dissatisfied with the outcome or the student does not bring an appeal within the required timescale, a Completion of Procedures letter will be issued on the student's request. The Completion of Procedures letter will indicate how to make a complaint to the



Office of the Independent Adjudicator (OIAHE), and details are also available on the OIAHE's website ([www.oiahe.org.uk](http://www.oiahe.org.uk)).

## 9 Record Keeping

- 9.1 The University is committed to continuous improvement and constructive handling of any complaints, taking reasonable action to ensure that similar situations do not re-occur. Complaints shall be monitored to identify trends, areas of good practice and where improvements could be made.
- 9.2 Academic and administrative staff are advised to document carefully where concerns and complaints have been raised at the informal and semi-formal stage of the procedure and place their records on the student's personal file. A log of the number and category of informal and semi-formal complaints should be kept by the Course Team and reported in the Annual Monitoring Report
- 9.3 The Student Conduct and Compliance Team will submit an annual report on Student Complaints to the Quality Assurance and Enhancement Committee (QAEC). Recommendations from this report shall be used to enhance the quality of the student experience by informing the future development of University practices, procedures and activities. Monitoring reports will not contain any personally identifiable information. Completion of the recommendations will be monitored by QAEC.
- 9.4 Observations raised in the Annual Report from Student Conduct and Compliance should be supported by University Committees and should include action plans to deliver service improvements tied to recommendations and actions with owners and deadlines.

