

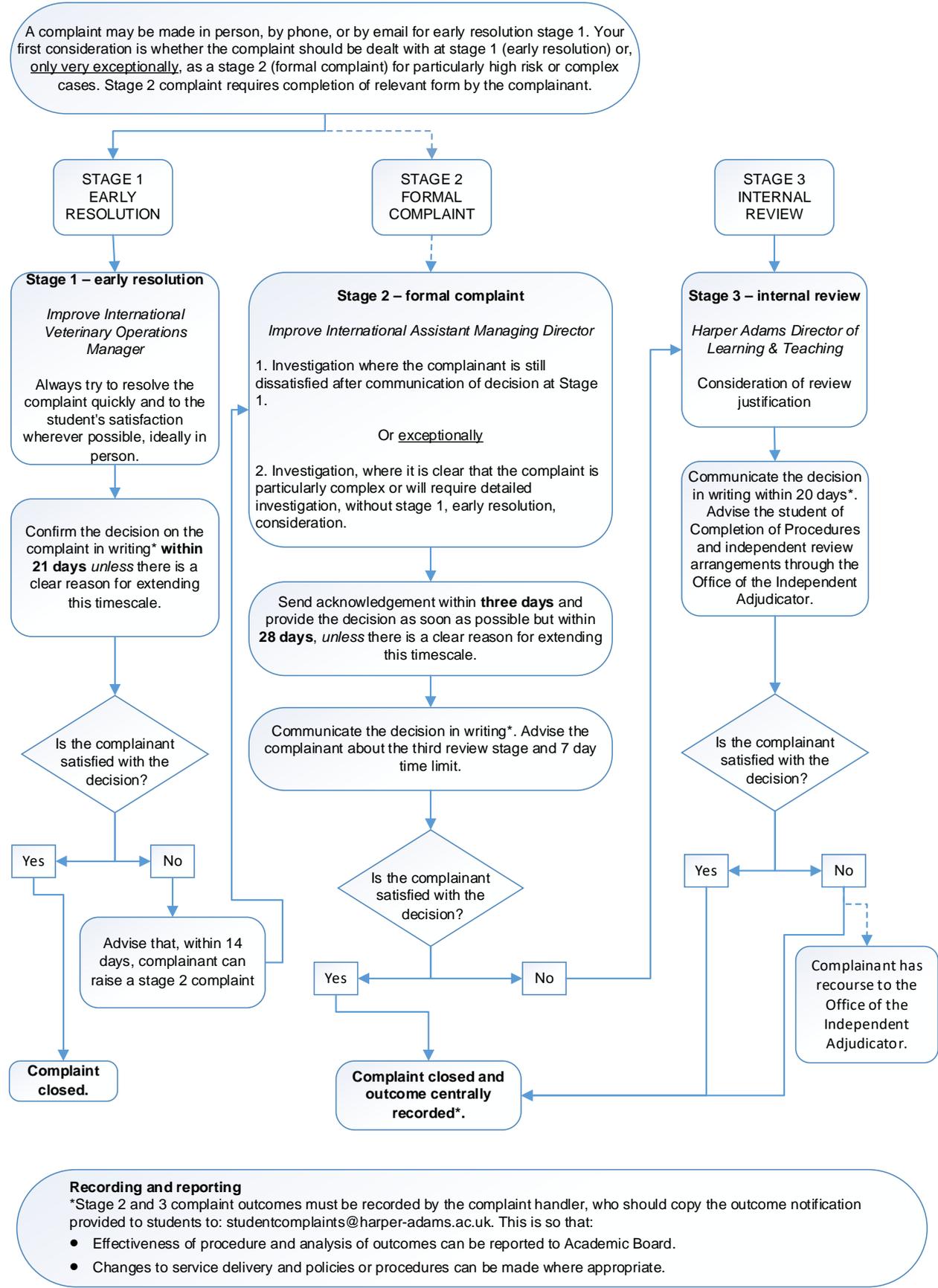
Improve International Delegate Complaints Procedure

This complaints procedure reflects Harper Adams University and Improve International’s commitment to valuing complaints. Our aim is to resolve issues of dissatisfaction as close to the initial point of contact as possible and to conduct thorough and fair investigations of complaints so that, where appropriate, we can make evidence-based decisions on the facts of each individual case. The procedure takes account of the *Good practice for handling student complaints and appeals* issued by the Office of the Independent Adjudicator for Higher Education (December 2016). The Complaints Procedure will be signposted from the appropriate pages on the Improve International website, to ensure that students are aware of their rights. This procedure does not apply to members of the public. This procedure contains the following contents and provides the details which are summarised in Figure 1.

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Figure 1 Overview of the Complaints Handling Procedure



What is a complaint?

1. For the purpose of this procedure, a complaint may be defined as:

“An expression of dissatisfaction by one or more delegates about the standard of service, action or lack of action, provided by Improve International”

2. A complaint may relate to:

- The quality and standard of service
- Failure to provide a service
- The quality of facilities or learning resources provided by a Speaker
- Treatment by or attitude of a member of Improve International staff, representative or Speaker
- Failure to address the behaviour of other delegates that impacts on learning
- The failure of Improve International to follow an appropriate administrative process
- Dissatisfaction with an Improve International policy, although it is recognised that policy is set at the discretion of Improve International
- The refusal of a reasonable adjustment request by a disabled student under the terms of the Equality Act 2010

3. This definition is very broad and the list above is not exhaustive. However, not every concern raised is a complaint. For example, the following **are not complaints**:

- A request to a member of staff or Speaker to revise the way in which they provide support or guidance, in order to allow the delegate to learn more effectively
- A routine, first-time request for a service
- A request under the Freedom of Information Act or General Data Protection Regulation.
- A request for information or an explanation of policy or practice
- An insurance claim
- An issue which is being, or has been, considered by a court or tribunal
- An attempt to have a complaint reconsidered where an Improve International procedure has been completed and a decision has been issued
- An appeal about an academic decision in relation to the award of grades and academic credit

4. These issues will be dealt with directly with individuals providing a service or under alternative appropriate processes rather than under the complaints procedure. It should be noted, however, that some situations can involve a combination of issues, some are complaints and others are not, and each case should be assessed on a case by case basis. Other procedures which students might have cause to use include the following:

5. Advice on the operation of the complaints handling procedure or on the appropriate procedure to be followed in a specific set of circumstances can be sought from Improve International Veterinary Operations Director, Juliet Pope (Juliet.pope@improveinternational.com)

Who can make a complaint?

6. The complaints procedure covers complaints about a delegate's experience during their time registered with Improve International. Only delegates registered on an Improve International course, or those who have recently completed an Improve International course, may make a complaint, within the timescales set out herein.

Collective Complaints

7. The normal expectation is that delegates will submit a complaint which relates to their own experience only. If a service is deemed to have failed several delegates, a collective complaint can be submitted by a nominated individual. All correspondence, including the final outcome, will be directed through this individual.

Frivolous or vexatious complaints

8. Improve International and Harper Adams University may reject a complaint at any time if, in the opinion of the Improve International Veterinary Operations Manager or Harper Adams Director of Learning and Teaching, or their nominees, the complaint is frivolous or vexatious.
9. A frivolous or vexatious complaint can be characterised in a number of ways:
 - Complaints which are obsessive, persistent, harassing, prolific, repetitious;
 - Insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;
 - Insistence upon pursuing potentially meritorious complaints in an unreasonable manner;
 - Complaints which are designed to cause disruption or annoyance;
 - Demands for redress which lack any serious purpose or value.

Anonymous complaints

10. Complaints submitted anonymously will not normally be considered. If, however, an anonymous complaint presents compelling evidence which supports the need for investigation, the University and Improve International may give consideration to the issues raised and will record the complaint so that corrective action can be taken as appropriate. If the complaint is considered to merit investigation for reasons of public interest, the matter might be dealt within the Improve International Whistleblowing Procedures. The Improve International Veterinary Operations Manager, or nominee, will review anonymous complaints, in consultation with relevant staff at Harper Adams University in deciding whether they will be investigated further. No correspondence will be entered into with an anonymous complainant, including acknowledgment of receipt of the complaint.

Unacceptable behaviour

11. Improve International is committed to providing a fair, consistent and accessible service for all delegates. However, Improve International must also provide a safe working environment for staff and ensure that work is undertaken in an efficient and effective manner. Whilst all delegates have the right to be heard, understood and respected, staff have the same rights. The actions of complainants, or their nominated representative, who are angry, demanding, or persistent may result in unreasonable demands on, or unacceptable behaviour towards staff. It is these actions or behaviour that is considered unacceptable and aim to manage under this guidance. These behaviours are set out below:

- **Aggressive, offensive or abusive actions or behaviour**

Examples of actions or behaviour grouped under this heading include any actions or behaviour that may have the potential to cause staff to feel intimidated, threatened or offended. These include, but are not limited to: threats, physical violence, personal verbal abuse, derogatory remarks, sarcasm and rudeness. Inflammatory statements and unsubstantiated allegations can amount to abusive actions or behaviour. Violence is not restricted to acts of aggression that may result in physical harm. It also includes behaviour or language, whether oral or written, that may cause staff to feel afraid, threatened or abused.

- **Unreasonable demands or persistence**

Examples of unreasonable demands may include: requesting responses within an unreasonable timescale; insisting on seeing or speaking to a particular member of staff; continual phone calls, emails, or letters; demanding answers to an unreasonable, or an excessive number of, questions about the way in which staff would normally discharge their responsibilities or seeking their personal opinions on matters; repeatedly changing the substance of an appeal or raising unrelated concerns.

When the actions or behaviour of a complainant or their representative is unacceptable they will be told why it is unacceptable and given the opportunity to modify their actions or behaviour. If the unacceptable actions or behaviour continue, Improve International will take appropriate measures, including terminating consideration of their complaint and the issue of a Completion of Procedures letter.

12. If a delegate's complaint is considered frivolous or vexatious, or if the complainant's behaviour is unreasonable, the Assistant Managing Director of Improve International, in consultation with Harper Adams University's Director of Learning and Teaching, will write to the delegate explaining that Improve International is terminating further consideration of the complaint, setting out the reasons for doing so, and issue a Completion of Procedures letter.

Time limit for making complaints

13. Complaints should be raised with Improve International as soon as problems arise to enable prompt investigation and swift resolution. This complaints procedure sets a time limit of 28 calendar days to raise a complaint with Improve International, starting from when the complainant first became aware of the problem, unless there are special circumstances for requesting consideration of a complaint beyond this time.
14. Beyond the 28- day time limit, any discretion in the way that the time limit is applied must be agreed with the Assistant Managing Director, or nominee, and will require evidence of mitigating circumstances that prevented the complainant from making their concerns known in a timely way, within the deadline.

The Complaints Procedure

15. The complaints procedure is intended to provide a quick, simple and streamlined process with a strong focus on early resolution. The procedure involves up to three stages, as illustrated in Figure 2 below;

Figure 2. The Complaints Procedure



16. **Stage 1 Early complaints resolution** seeks to resolve straightforward complaints swiftly and effectively at the point at which the complaint is made. Complaints can be made in person or in writing and should be addressed to the Veterinary Operations Manager at Improve International. The complainant should make it clear that they are making an informal, Stage 1 complaint, as opposed to making an observation, asking a question or providing feedback. Complainants should also ensure that they include the following within the information that they provide as part of their complaint, irrespective of the way in which they make their complaint known:

- They are making an informal, Stage One complaint within the terms of this procedure, so that the staff member knows that they must deal with the concerns accordingly
- The specific concern and the impact of the problem on the delegate
- Where relevant, the staff, Speakers or contractors who the complainant believes are involved
- The outcome that they are hoping for.

The purpose of early resolution is to attempt to resolve as quickly as possible, and normally within **21 calendar days**, as close to the point of the problem as possible. In exceptional circumstances a short extension of time may be necessary to increase the possibility of resolving the complaint at the early resolution stage (for example, by obtaining information from other areas where no single area of Improve International is responsible for the issue(s) being complained about). The complainant must be told of the reasons for extending the deadline and advised of the new timescale for resolution.

The outcome will be communicated to the complainant by the staff member handling the complaint. This may be face-to-face, by phone or by email. If the outcome is given orally, the decision must also be summarised within an email to the complainant headed, "*Early resolution complaints outcome*", setting out the following:

- Date of receipt of the first stage, informal complaint
- The specific concern raised by the student and their assessment of the impact of the problem on them
- The outcome that the student was hoping for
- The outcome(s) that the Veterinary Operations Manager determined, including, where applicable, any apology, explanation or change to existing arrangement for the trainees and/or for other trainees, or a commitment to identify the need for approved Improve International policies or procedures to be resolved by the appropriate postholder or committee
- Advice to the delegate that the early resolution complaint has been closed and advice on the availability of a second stage, formal complaints procedure, if they remain dissatisfied

17. **Stage 2 A formal complaint** is appropriate where a complainant is dissatisfied with the outcome of early resolution. These should be addressed to the Improve International Assistant Managing Director.

Delegates must make a formal complaint, **within 14 calendar days** of notification of the Stage 1, early resolution outcome, by completing the Formal Complaints Form in Annex 1 of this document and submitting it to the Improve International Assistant Managing Director, "john.douglass@improveinternational.com". Formal, Stage 2, complaints which are received after 14 calendar days of notification of the early resolution first stage complaint outcome, will normally be rejected as out-of-time. In such instances, Improve International will issue a Completion of Procedures letter. The only exceptions to this are where a delegate provides evidence of mitigating circumstances that prevented them from submitting a formal, second

stage complaint within the approved timescale, for example through unexpected incapacitation or through disability.

The formal complaint must include:

- An attached copy of the early resolution, first stage complaint outcome notification email, where relevant
- Explanation of why the early resolution, first stage complaint outcome is not satisfactory
- Details of the specific concern and the impact of the problem on the delegate, including any supporting, independent evidence
- Where relevant, the staff, Speakers or contractors the complainant believes to be involved in the problem
- The outcome that they are hoping for.

Stage 2 complaints will normally be acknowledged in writing within 7 calendar days. Improve International will provide a full response to the complaint as soon as possible **but no later than 28 calendar days** from the time that the stage 2 complaint was received for investigation.

The outcome of the formal complaint will be communicated to the complainant in writing. The decision, and details of how and when it was communicated to the complainant, will also be recorded. The recorded outcome of the formal complaint will include the following:

- The delegate's name, course and Speaker
- Date of receipt of complaint
- Name of the complaints handler
- The specific concern raised by the delegate and their assessment of the impact of the problem on them
- The staff, Speaker or contractor who the delegate identified as involved
- The outcome that the delegate was hoping for
- A summary of any investigations undertaken, including with whom the complaints handler discussed the complaint and any documents reviewed
- The conclusion(s) drawn from any investigations
- The outcomes that the complaints handler determined, including, where applicable, any apology, explanation or change to existing arrangements for the delegate and/or for other delegate, or a commitment to identify the need for approved Improve International policies or procedures to be resolved by the appropriate post holder or committee
- Advice to the delegate that the formal resolution complaint has been closed, the date of notification of outcome, and advice on the availability of a third and final internal review stage, within 7 calendar days of the notification, through representation to the Assistant Managing Director at Improve International, if they remain dissatisfied.

Formal complaint outcomes are recorded by the Improve International Assistant Managing Director or nominee

18. **Stage 3 Complaints review** enables a delegate who remains dissatisfied with the outcome of the formal complaint investigation to request a review of the decision by the Harper Adams Director of Teaching & Learning, or nominee. Where a delegate remains dissatisfied with the outcome of the formal complaint investigations, they are permitted to request a review of the decision on the following grounds, **within 7 calendar days** of notification of the second stage complaint outcome:

- Appropriate procedures were not followed at the formal complaints stage
- The outcome was not reasonable

- New material evidence is presented which the delegate was unable, for valid and evidenced reasons, to provide at the formal stage.

The delegate should submit a letter to the Harper Adams Director of Teaching & Learning setting out the basis on which they are requesting that the decision be reviewed, including a copy of the formal complaint outcome notification. The Harper Adams Director of Teaching & Learning or nominee, will consider the request to review the outcome and provide the outcome of any review normally **within 20 calendar days** of receipt of the written request. Where the review request is received after the deadline for doing so, and there are no mitigating circumstances for lateness, the review request will be rejected and a Completion of Procedures letter will be issued.

The Harper Adams Director of Teaching & Learning or nominee, will investigate the claim(s) made and provide a definitive outcome, detailed as set out in paragraph 16, with the exception of referral to the third, internal review, stage. On completion of any review and outcome conclusion, they will issue a Completion of Procedures letter at the conclusion of the internal proceedings. Such a letter will also advise the delegate of the arrangements by which they might raise a complaint with the Office for the Independent Adjudicator (OIA) if they remain dissatisfied.

Completion of procedures and recourse to independent, external review

19. Once Improve International's complaints procedure has been exhausted, the delegate will be issued with a Completion of Procedures letter, which confirms that Improve International's internal procedures are concluded. They are advised to contact the Office of the Independent Adjudicator (OIA) for Higher Education if they are dissatisfied with the outcome of the final stage of the complaints procedure, using the prescribed wording set out on the OIA's website <http://www.oiahe.org.uk>). The OIA will determine whether the delegate's complaint is eligible for consideration under its rules.

Maintaining confidentiality

20. Confidentiality is an important factor in conducting complaints investigations. Improve International and Harper Adams University will always have regard to any legislative requirements; for example, data protection legislation and policies on confidentiality and the use of complainant information. Complaints will be handled with an appropriate level of confidentiality and information released only to those who need it for the purposes of investigating or responding to the complaint. No third party will be told any more about the investigation than is strictly necessary in order to obtain the information required from them.
21. Where a complaint has been raised against a student or member of staff and has been upheld, the complainant will be advised of this. However, it would not be appropriate to share specific details affecting specific students or staff members, particularly where disciplinary action is taken.

Data security and records retention

22. Records of complaints will be retained for a period of 18 months, following the conclusion of study, or 15 months from the issue date of a Completion of Procedure letter, whichever is the

longer, for the purpose of addressing any complaints or appeals. This allows Improve International to align itself with the current OIA complaints process.

23. For delegates where a dispute is ongoing or is in reasonable contemplation for which there is a statutory limitation period, the records relating to the issue in dispute will be kept for the relevant statutory limitation period.

Annex 1 – Stage 2 Formal Complaints Form

The form will expand if you need to type more words

Delegate's details	
Name	
Course/ Certificate title	
Year of study	
Speaker	
Outcome of Stage 1 Early Resolution Complaint	
Please append the written outcome of your stage 1 complaint, including when you made the informal complaint, who dealt with it and the outcome of that complaint.	Tick to confirm outcome of Stage 1 complaint appended
Please explain why you are not satisfied with the outcome of the Stage 1 complaint	

Details of Stage 2 Complaint and Outcome You are Seeking		
Please detail the specific concern and how the problem is impacting on you		List of evidence to support each claim ¹ :
Please confirm the service(s) involved in the problem, including individuals who will need to be consulted as part of any investigation		List of evidence to support each claim ¹ :
What is the outcome that you are seeking?		List of evidence to support each claim ¹ :
Please include any other detail that you believe is relevant		List of evidence to support each claim ¹ :

Delegate's signature to confirm that all claims made within this complaints form are truthful and that all evidence is genuine:

¹ All evidence must be appended to the submitted complaints form within the deadline.

The completed form should be e-mailed, along with supporting evidence, to Improve International's [Assistant](#) Managing Director john.douglass@improveinternational.com within 14 calendar days of being notified of the Stage 1 outcome.