

POLICY TITLE		DATE OF APPROVAL
Complaints Policy		May 2025
APPROVED BY	VERSION NO.	VALID UNTIL
Corporation Board	6	May 2028

OWNER	Director of Governance		
GROUP EXECUTIVE LEAD	Chief Executive Officer		
DOCUMENT TYPE	Policy <input checked="" type="checkbox"/> Group Procedure <input type="checkbox"/> Local Procedure <input type="checkbox"/>		
PURPOSE	The purpose of this policy is to set out how feedback in the form of complaints should be submitted, how we aim to resolve any issues identified and the timescales that will apply.		
APPLICABLE TO	All NCG employees, as well as consultants, vendors, agency workers, contractors, service users, trainees/students, volunteers and/or any other parties who have a business relationship with NCG.		
EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	(If EA not applicable, please explain)		
KEY THINGS TO KNOW ABOUT THIS POLICY	<ol style="list-style-type: none"> 1. As a learning organisation, NCG values all feedback received as it helps us to improve our services. 2. NCG operates a 3-stage complaints policy process (formal – internal appeal – executive appeal). 3. Complaints must be submitted and handled in accordance with the timelines set out in this policy. 4. NCG reserves the right not to investigate complaints which it considers to be vexatious or malicious. 		
EXPECTED OUTCOME	Readers are expected to understand the organisational position on complaints, know their responsibilities in relation to the policy and comply with the terms of the policy.		

MISCELLANEOUS	
LINKED DOCUMENTS	<ul style="list-style-type: none"> • Student Positive Behaviour Policy • Disciplinary Policy • Grievance Policy • Whistleblowing and Disclosure Policy

	<ul style="list-style-type: none">• Code Of Practice On Freedom Of Speech Including External Speakers• Complaints Guidance for Staff
KEYWORDS	<ul style="list-style-type: none">• Complaints• Feedback

Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Disability / Difficulty	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Marriage and Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA4 - Does the policy/process discriminate or victimise any groups or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
EIA 6 - How do you know that the above is correct?	Consulted extensively with key colleagues in advance of review at Policy Review Council.		

1. GENERAL POLICY STATEMENT

- 1.1. NCG is 'Ambitious for Outstanding' and this ambition drives us to continually monitor, develop and improve the quality of the services we provide.
- 1.2. As a learning organisation, we understand the important role of feedback and we value and welcome any feedback which will help us to do better.
- 1.3. This policy therefore sets out how feedback in the form of complaints should be submitted, how we aim to resolve any issues identified and the timescales that will apply.

2. GENERAL POLICY PRINCIPLES

- 2.1. NCG will seek to resolve all complaints promptly and effectively.
- 2.2. All complaints will be handled fairly, impartially, and confidentially.
- 2.3. No complainant will be disadvantaged for raising a concern in good faith.
- 2.4. NCG operates an informal process within its colleges and professional services through which it is expected that most low-level complaints will be addressed. Complainants are therefore encouraged to resolve concerns informally first, by speaking to their normal contact within any of the NCG Colleges / Professional Services who will attempt to resolve the issue raised. Any member of staff should be able to resolve an issue raised informally or refer to the appropriate colleague for resolution. Issues raised informally typically require little or no investigation and should be resolved quickly (i.e. less than five working days).
- 2.5. NCG will use complaints as an opportunity for continuous improvement.
- 2.6. All formal complaints shall be recorded centrally by the Governance team and reported to the Executive Board and Corporation Board (or relevant Corporation Committee) for appropriate monitoring and oversight of volume and trends.

3. DEFINITIONS

Complaint - any expression of dissatisfaction about action, or lack of action, or about the standard of service provided by, or on our behalf.

Complainant – anybody who raises a complaint.

Feedback – helpful information which can be positive (compliment) or negative (complaint) which is used as the basis for improvement.

Malicious complaint - a complaint made with the deliberate intention to cause harm or distress to another person, often by making false accusations or exaggerating issues with no basis in truth, primarily aimed at harassing, defaming, or inconveniencing; essentially, a complaint made with malicious intent rather than to address a genuine concern.

Unreasonable behaviour – any behaviour which impacts consideration of the complaint because of the frequency or nature of the complainant's contact with the College or professional service in question.

Vexatious complaint – a complaint that is pursued without merit, and is intended to cause annoyance, harassment, or disruption. Vexatious complaints can be unreasonable, repetitive, or burdensome.

4. RESPONSIBILITIES

- 4.1. Complaints Points of Contact (PoCs). Each College has a named lead for complaints (PoC). PoCs are responsible for:
 - Allocating individuals (e.g. Head of Curriculum OR Director of Faculty) to investigate Stage 1 complaints and ensuring that complaints are resolved in a timely manner.
 - Reporting on the outcome of complaints to the central Governance team for logging and tracking in accordance with the timelines set out in this policy.
- 4.2. Executive Principals / Executive Directors are responsible for:
 - Reviewing Stage 3 appeals and responding to complainants accordingly.
- 4.3. Principals (Colleges) and Directors (Professional Services) are responsible for
 - The general oversight of complaints for their college / professional service, ensuring that complaints are dealt with satisfactorily, improvement points are identified and actioned.
 - Ensuring that all staff involved in the handling of complaints are appropriately trained and made aware of their individual roles and responsibilities in relation to the policy.
 - Reviewing Stage 2 appeals and responding to complainants accordingly.
- 4.4. Managers (e.g. Head of Curriculum OR Director of Faculty) are responsible for
 - Investigating and resolving Stage 1 complaints according to the timescales set out in this policy.
 - Supporting the PoC and central Governance team in the accurate logging and tracking of complaints and their closure.
- 4.5. The Governance team is responsible for
 - Logging and tracking of all complaints centrally.
 - Monitoring and reporting on emerging themes and learning points and reporting to the Executive Board / Corporation Board / Corporation Committee accordingly.
- 4.6. All staff are responsible for
 - Forwarding any complaint to the central Governance team (complaints@ncgrp.co.uk) for logging.
 - Supporting a complainant with a complaint in accordance with this policy.
 - Participating in any investigation relating to a complaint.
 - Actioning any improvements identified as the result of a complaint.

5. WHO CAN MAKE A COMPLAINT?

- 5.1. NCG accepts complaints from students, staff, parents / guardians, members of the public, third-party providers and subcontractors, vendors, volunteers, employers who have a working relationship with the Group and anybody else who uses our services or premises.
- 5.2. A group of students may collectively bring a complaint, where there is a shared concern common to all complainants (a 'group complaint'). In such cases one student should be nominated by the group as the spokesperson and correspondent, with the consent of the other complainants. Each member of the group must be able to demonstrate that they have been personally affected by the issue(s) triggering the complaint. All communication, including the outcome, will be done via the spokesperson who has the responsibility to communicate to the rest of the group.
- 5.3. A complainant may request a third party representative, such as a parent, partner, or employer, to act on their behalf during the complaints process. In such cases, the complainant will need to provide confirmation of their consent before the issue can be investigated. Such confirmation allows the third party to communicate with NCG while the complaint is under investigation. The complainant's personal and/or sensitive data may be disclosed to the third party as part of the process. The complainant can restrict or withdraw third party consent at any time.
- 5.4. NCG treats all complaints seriously including anonymous ones and will take action to consider them further, wherever it is proper to do so. Generally, anonymous complaints will be considered where they provide enough information for us to make further enquiries. Failing this, we may decide not to pursue the complaint. A decision not to pursue an anonymous complaint must be authorised by the responsible senior manager and reported to the central Governance team for tracking and reporting purposes.
- 5.5. NCG will not accept or act upon anonymous complaints until such time as the allegations can be substantiated.

6. SUBMITTING A STAGE 1 COMPLAINT

- 6.1. Where it has not been possible to resolve an issue informally, a formal Stage 1 complaint can be submitted in writing via email (complaints@ncgrp.co.uk) or through the Group's [complaints form](#). The complaint should include:
 - Name and contact details of the complainant
 - A clear description of the issue and the date it was identified. Complainants must provide sufficient detail for their complaint to be investigated.
 - Any supporting evidence
 - The outcome sought
- 6.2. Complaints must be raised within a timely manner to facilitate an effective investigation of the issues raised and no later than 3 months after the date of the

incident or completion of the course. NCG will not normally investigate any complaints made more than 3 months after the event.

- 6.3. Any complaint that is received via email or the complaints form, will be treated as a Stage 1 formal complaint.
- 6.4. Any complaint that is received verbally or through less formal means (e.g. via Teams or social media) will initially be treated as an informal complaint.
- 6.5. Any written complaint received locally by a college, that has not been resolved informally should be forwarded to complaints@ncgrp.co.uk for central logging as a Stage 1 formal complaint.

7. STAGE 1 COMPLAINTS PROCESS AND TIMELINES

- 7.1. Complaints will be acknowledged by the central Governance team within 3 working days of receipt.
- 7.2. A designated person will be assigned to investigate and a response will be provided in writing no later than 20 working days after receipt of the complaint.
- 7.3. Complaints received during college closures and/or holiday periods will not be covered under the 20-working day cycle, due to staff availability. If this is the case the complainant will be advised of this in their acknowledgement letter or in a further holding letter, and an extended deadline will be set.
- 7.4. Similarly, where a complaint is particularly complex, more time may be required to complete the complaint investigation. In such instances, the complainant will be advised in writing and an extended deadline will be set.
- 7.5. The investigation may involve speaking with relevant individuals and / or looking at relevant documentation. The complainant may be asked to attend a meeting to discuss the complaint as part of the investigation. The complainant may not bring legal representation to this meeting but may bring a friend, relative or representative from the Student Union (if relevant) to offer support.
- 7.6. If the complainant has any particular requirements (e.g. English as a second language, a learning difficulty and / or disability), they may bring a second person.
- 7.7. Complainants should inform the investigator(s) of any personal preferences, special education needs / neurodiverse conditions, disabilities or language barriers so that the necessary reasonable adjustments can be made.
- 7.8. During the investigation process, complainants should only discuss their complaint with the investigating officer. This is to preserve the independence of staff who may become involved with the complaint during the appeals process.
- 7.9. Following the conclusion of the investigation and within the 20-working day cycle, the person responsible for investigating will send an outcome letter to the complainant detailing the outcome of the investigation. This outcome letter will include:
 - A summary of the key issues raised.

- A summary of the complaint investigation, findings, and conclusions, including where appropriate, a resolution / remedial actions required to resolve the complaint.
- An outcome, stating whether the complaint has been upheld, partially upheld or not upheld and an explanation of the reasons for the decision.
- Details on how the complainant can appeal should they remain dissatisfied with the outcome of their Stage 1 formal complaint.
- A copy of the outcome letter must be shared with the central Governance team for tracking purposes.

7.10. Where a complaint is upheld, the complainant can expect the following:

- an apology
- an explanation of what went wrong
- a practical action to resolve the issue

7.11. Once a complaint outcome has been communicated to the complainant, unless the complainant escalates the complaint to Stage 2 within the set timeframe it shall be considered that the complaint is settled in full and the complainant has no further right to make claims against NCG pertaining to the issue(s) raised.

8. STAGE 2 – INTERNAL APPEAL

- 8.1. If a complainant is not satisfied with the outcome of their Stage 1 complaint, they should write within 10 working days of receipt of the outcome letter, explaining the reason/s why they are not satisfied, in writing or by email to: complaints@ncgrp.co.uk. NCG reserves the right to exercise discretion where it has not been possible for a complainant to submit their appeal within this timeline.
- 8.2. This will be regarded as an internal appeal and will be reviewed by the Principal at the relevant NCG college (or Director of the relevant professional service). This may be delegated to a Deputy as appropriate.
- 8.3. Appeals will be acknowledged by the central Governance team within 3 working days of receipt.
- 8.4. A response will be provided in writing no later than 15 working days after receipt of the appeal. Stage 2 appeals received during college closures and/or holiday periods may not be covered under the 15-working day cycle, due to staff availability. If this is the case the complainant will be advised of this in their acknowledgement letter or in a further holding letter, and an extended deadline will be set.
- 8.5. Where an appeal is particularly complex, more time may be required to complete the appeal process. In such instances, the complainant will be informed in writing and an extended deadline will be set.
- 8.6. Appeals will be only be considered under one or more of the following grounds:
- The investigation did not consider all the complaint points raised.

- The investigation was not conducted in accordance with the procedures set out in this policy.
 - New evidence has been made available that was not available at the time the complaint was submitted.
- 8.7. Where an appeal does not meet one or more of the grounds for review, the complaint outcome will not be reviewed. A notification of completion will be sent to the complainant by a member of the College's Principalship Team, Professional Service Director or their nominee, to close the matter.
- 8.8. Where an appeal meets the criteria for review, the Principalship or Director will conduct a review of the original investigation and will consider the procedure undertaken, the integrity, any additional evidence and the outcome provided. They will not fully reinvestigate the issue.
- 8.9. The possible outcomes are that the appeal will either be upheld, partially upheld or not upheld.
- 8.10. Following the conclusion of the appeal process and within the 15-working day cycle, the Principal or Director will issue an outcome letter to the complainant detailing the outcome of the appeal.

9. STAGE 3 – EXECUTIVE APPEAL

- 9.1. If a complainant is not satisfied with the outcome of their Stage 2 appeal, they should write within 5 working days of receipt of the outcome letter, explaining the reason/s why they are not satisfied, in writing or by email to: complaints@ncgrp.co.uk.
- 9.2. This will be regarded as an executive appeal and will be reviewed by the relevant Executive Principal or Executive Director of the relevant professional service.
- 9.3. The Executive Principal or Executive Director of the relevant professional service will conduct a review of the first appeal that was undertaken. They will not fully reinvestigate the issue.
- 9.4. Following the conclusion of the appeal process and within the 15-working day cycle, the Principal or Director will issue an outcome letter to the complainant detailing the outcome of the appeal. Stage 3 appeals received during college closures and/or holiday periods may not be covered under the 15-working day cycle, due to staff availability. If this is the case the complainant will be advised of this in their acknowledgement letter or in a further holding letter, and an extended deadline will be set.
- 9.5. The possible outcomes are that the appeal will either be upheld, partially upheld or not upheld.
- 9.6. The decision of the Executive Principal / Executive Director is final.
- 9.7. If the complainant remains dissatisfied with the final response, the complainant has the right to pursue the complaint with the [DfE](#) (Further Education) / or [Office of the Independent Adjudicator](#) (Higher Education).

10. HIGHER EDUCATION STUDENTS REGISTERED WITH A PARTNER

- 10.1. Higher education students registered with a partner organisation, should first follow the complaints policy of the partner institution.
- 10.2. Where the complaints process of the partner institution has been exhausted and the student remains dissatisfied, they should follow the steps relating to Stage 3 (executive appeal) above.

11. FURTHER EDUCATION STUDENTS REGISTERED WITH A SUBCONTRACTED PROVIDER

- 11.1. Further education students registered with a subcontracted provider should first follow the complaints policy of the provider.
- 11.2. Where the complaints process of the provider has been exhausted and the student remains dissatisfied, they should follow the steps relating to Stage 3 (executive appeal) above.

12. MALICIOUS / VEXATIOUS COMPLAINTS AND UNREASONABLE BEHAVIOUR

- 12.1. NCG reserves the right to reject any complaint without full consideration where it is considered malicious or vexatious or where the complainant demonstrates unreasonable behaviour.
- 12.2. Malicious complaints include but are not limited to:
 - complaints which deliberately seek to harm a fellow colleague or student;
 - complaints which are knowingly based on false information, rumour or gossip with the intention of causing harm;
- 12.3. Vexatious complaints include but are not limited to:
 - complaints which are obsessive, harassing, or repetitive;
 - complaints which are designed to cause disruption or annoyance;
 - demands for redress which lack any serious purpose or value;
- 12.4. Examples of unreasonable behaviour include but are not limited to where a complainant:
 - Refuses to cooperate with the complaint's investigation process. **Note:** where a complainant refuses to cooperate or provide further information to support the investigation, the complaint will be closed within 5 working days of the request for cooperation / additional information.
 - Refuses to accept that certain issues are not within the scope of the complaints policy.
 - Changes the basis of the complaint as the investigation proceeds.

- Makes excessive demands on College time by frequent, lengthy and complicated contact with staff regarding the complaint in person, in writing, by email and by telephone while the complaint is being dealt with.
 - Refuses to accept the findings of the investigation into that complaint where the College's complaint procedure has been fully and properly implemented and completed including executive appeal.
 - Seeks an unrealistic outcome.
 - Uses threats, abusive, offensive or discriminatory language or violence.
 - Publishes unacceptable information on social media or other public forums.
- 12.5. If NCG considers that a complaint falls into any of the above categories, the complainant may be advised that their complaint will not be considered further. NCG further reserves the right to take appropriate action in accordance with the relevant policy (e.g. student positive behaviour policy, staff disciplinary policy etc.)

13. RECORDING AND REPORTING

- 13.1. Complaints provide valuable customer feedback and one of the aims of this policy is to identify opportunities to improve services across NCG.
- 13.2. All complaints therefore will be systematically recorded so that we can use the data for analysis and management reporting. By doing so, we can identify and tackle what causes complaints. Also, where appropriate, we can identify training opportunities and improve our service.
- 13.3. All complaints will be reported on a monthly basis to local principalship teams or professional service for oversight and monitoring.
- 13.4. Complaints will be reported on a quarterly basis to the Executive Board and on an annual basis to the Corporation Board or appropriate Corporation Committee.

14. STATEMENT ON IMPLEMENTATION

Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.

15. STATEMENT ON EQUALITY AND DIVERSITY [POLICIES ONLY]

NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

16. STATEMENT ON FREEDOM OF SPEECH

NCG is committed to upholding the principles of freedom of speech as enshrined in UK law. This policy is designed to ensure that all members of our college community, including students, staff, and visitors, can express their views and ideas freely and without fear of censorship or reprisal, provided that such expressions are within the law.

We affirm that this policy does not, in any way, diminish or undermine the rights of individuals under existing Freedom of Speech legislation.

17. STATEMENT ON CONSULTATION

This policy / procedure has been reviewed in consultation with key stakeholders across NCG colleges, the Policy Review Council and Executive Board.

VERSION CONTROL			
Version No.	Section Changed / Description of Change and Rationale	Author/Reviewer	Date Revised
1	New policy	Exec. Director of Quality	2018
2	Removal of the need to have an underpinning college procedure; various minor changes to text	Exec. Director of Quality	2019
3	Removal of informal stage 1 measures and general policy update (including the introduction of electronic collection). Executive ownership changed to Executive Director of Governance & Risk	Exec. Director of Quality	2021
4	Minor amends to reflect organisation structure changes. Executive ownership changed to Chief Operations & Compliance Officer	Chief Operations & Compliance Officer	2023
5	Dynamic update to reflect executive restructure.	Director of Governance	Nov 2024
6	Comprehensive rewrite. Amendments include: removal of compliments, addition of vexatious/malicious complaints, timelines for submitting a complaint added, criteria for appeal added, stage 1 complaints timeline extended from 15 to 20 days, group complaints and third party complaints also provided for.	Director of Governance	May 2025

APPENDIX 1 – COMPLAINTS PROCESS

INFORMAL RESOLUTION

For straight-forward issues that have been raised informally, are easily resolved and require little or no investigation.

Complaint addressed by any member of staff or referred to appropriate person for resolution. 'On-the-spot' apology, explanation or other action to resolve issue quickly, in 5 working days or less.

STAGE 1 – FORMAL

For issues that have not been raised or resolved informally, have been submitted in writing and are more complex.

Complaint received, acknowledged within 3 working days. A formal response issued by the Head of Curriculum / Director of Faculty within 20 working days, after a thorough investigation of the points raised.

Complaint outcome logged centrally for reporting purposes.

STAGE 2 – INTERNAL APPEAL

For complaints that have not been resolved at Stage 1 and meet the criteria for internal appeal.

Appeal received within 10 days of Stage 1 outcome letter, acknowledged within 3 working days. A formal response issued by the local principalship or Director (Professional Services only) within 15 working days.

Appeal outcome logged centrally for reporting purposes.

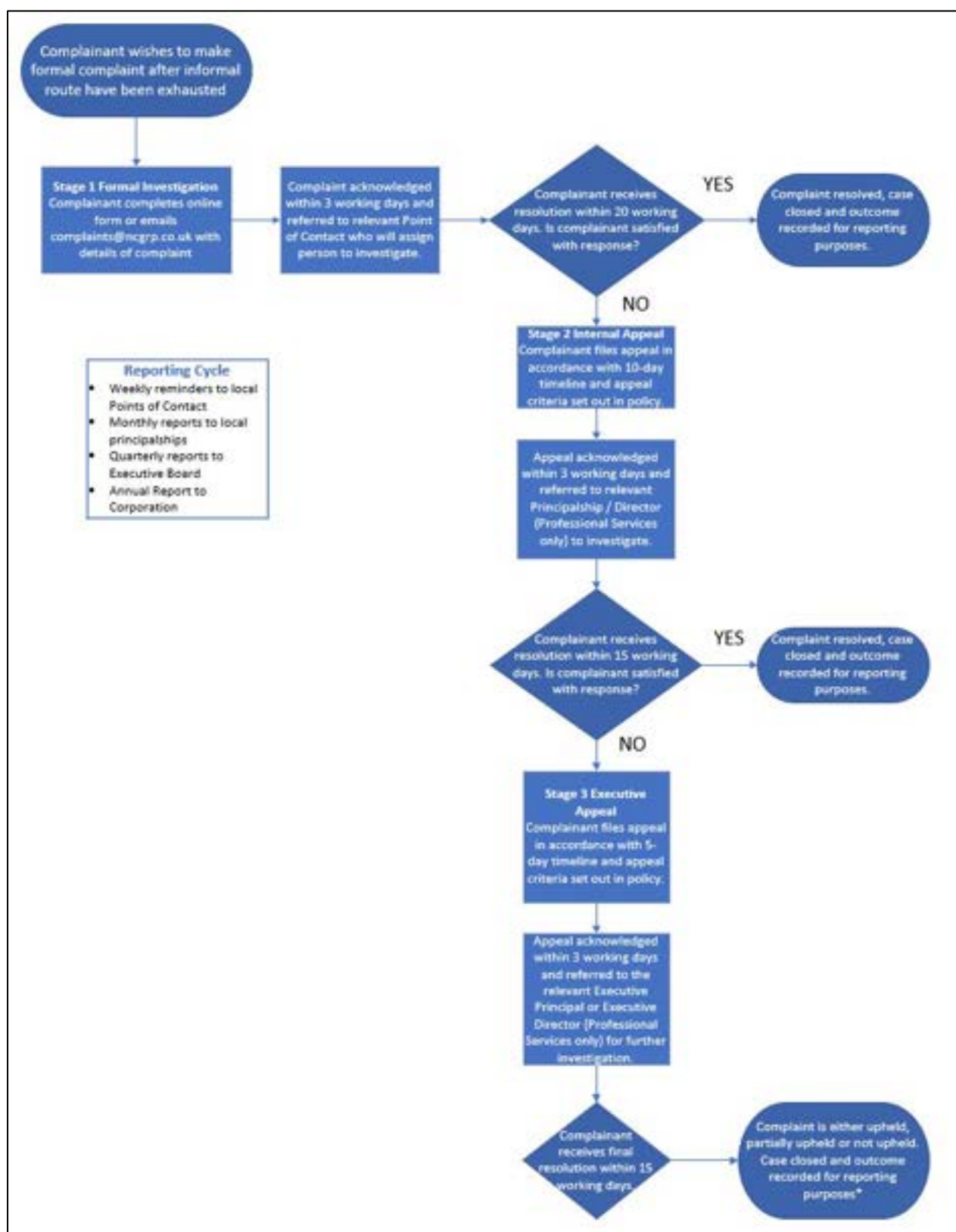
STAGE 3 – EXECUTIVE APPEAL

For complaints that have not been resolved at Stage 2 and meet the criteria for executive appeal.

Appeal received within 5 days of Stage 2 outcome letter, acknowledged within 3 working days. A formal response issued by the relevant Executive Principal or Executive Director (Professional Services) within 15 working days.

Appeal outcome logged centrally for reporting purposes.

APPENDIX 2 – COMPLAINTS ESCALATION FLOWCHART



* The decision of the Executive Principal / Executive Director is final. However, if the complainant remains dissatisfied with the final response, the complainant has the right to pursue the complaint with the DfE (Further Education) / or Office of the Independent Adjudicator (Higher Education).

APPENDIX 3 – WHAT IS NOT A COMPLAINT

Not all issues raised can or should be resolved via the complaints process. The following is a list of examples where the complaints policy should not be used. This list is not exhaustive and you should decide the best resolution route for each individual case.

1. Any risk to safeguarding – refer to the Safeguarding policy and procedure.
2. Allegations of fraud or serious misconduct – refer to the Whistleblowing and Disclosure policy.
3. Issues relating to any aspect of an employee's employment – refer to the Grievance policy.
4. Complaints about the CEO, Chair, Governors and Senior Post-holders – refer to the Grievance Policy.
5. Employee malpractice – refer to the Malpractice and Disciplinary policies.
6. Learner malpractice – refer to the Malpractice and Student Positive Behaviour policies.
7. Appeal against an academic decision – refer to the HE Academic Appeal procedure.
8. Requests under the Data Protection or Freedom of Information (Fol) Acts including any appeals under the associated Data Protection Fol policies.