Complaints Policy and Procedure

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Lead Contact	Head of Student Services m.javed@sirm.ac.uk
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Complaints Policy and Procedure

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A. SIRM Student Complaints Policy

1. Introduction

SIRM College is dedicated to ensuring all students receive a high quality experience and that they are treated in a fair and reasonable way. However, there will be occasions when a student may want to raise issues of concern or complaint, both informally and formally. The following procedure is designed to enable students to do this. This Student Complaints policy and its procedures provide the informal and formal processes which must be followed where a student (or group of students) wishes to make a complaint.

A complaint can be submitted about acts or omissions of SIRM which took place at a time when the complainant (or group of complainants) was a student of SIRM, including those who were on temporary withdrawal at the time of the act or omission.

Graduates have recourse to this Student Complaints procedure for up to three months following the publication of their final grades. Guidance for students wishing to make a formal complaint can be found on the Student Complaint Form on the SIRM website.

Most issues of complaint can be resolved without resorting to submitting a formal complaint. In many cases issues or concerns can be resolved via an informal discussion with the student's tutor or the appropriate relevant member of staff, but if the matter is unresolved, or if it is too serious or complex to try to resolve informally, the issues can be escalated under the formal stage of this Student Complaints Procedure.

The SIRM Student Complaints Policy and Procedure is designed to comply with the Principles of the OIA's Good Practice Framework, which set out that procedures should be:

- Accessible and clear
- Fair, independent and confidential
- Inclusive
- Flexible, proportionate and timely

and that they:

- improve the student experience

These principles therefore underpin this Policy and its procedures.

2. SIRM Complaint Management Principles: fairness, bias, reasonable adjustments

- SIRM will investigate complaints in line with the rules of procedural fairness and the principles set out in the OIA's Good Practice Framework. In addition, SIRM undertakes to manage student complaints by following the principles set out below:

a) Complaint Investigators and Decision Makers will consider issues without bias; they will not have been previously involved in making decisions about the specific matters complained about.

b) All decisions reached and action(s) taken under any formal stage of this Policy will be supported by clear rationales. Complaint Investigators and Decision Makers will give supporting reasons for their decisions to ensure fairness and understanding.

c) Complaint Investigators and Decision Makers will be allowed to reach their decisions without undue or inappropriate influence or pressure from other individuals.

d) Decisions made by Complaint Investigators and Decision Makers will stand until and unless overturned in a later stage of the procedures under this Policy, or in the event of directed change from a statutory/regulatory body eg the OIA, OfS.

e) SIRM will apply reasonable adjustments to these procedures where possible, when it is reasonable to do so to prevent any student from suffering a substantial disadvantage as a result of a disability. Those requiring reasonable adjustments are expected to inform staff they are in contact with about this procedure for a discussion about what adjustments might be necessary and reasonable. Where a requested adjustment is deemed to not be reasonable by SIRM, a clear explanation of the reason(s) why will be given.

3. Scope of this policy and procedure

Complaints within the scope of this Policy and Procedure

This Student Complaints Policy & Procedure covers the following types of complaint:

- **Academic Complaint** – this is the expression of a specific concern about the provision of a course, programme or related academic service (e.g. tuition, supervision, organisation or management of the course)

- **General Complaint** – this broadly covers any concerns pertaining to a student's non-academic experience at SIRM.

- **Complaints about harassment/sexual misconduct** - to ensure that students are facilitated to raise such issues with SIRM, students can use this procedure to make a complaint about harassment, sexual misconduct and/or other unacceptable behaviours but such issues may as necessary be referred into other procedures (such

as the procedures under the Harassment and Sexual Misconduct Policy, or the Student Misconduct and Disciplinary Procedure) in order that they can be dealt with appropriately. Where this occurs, the Student Complaints Procedure will normally be placed on pause whilst other procedures are conducted instead, or terminated where matters are wholly referred for resolution under other procedures.

- **Complaints about staff** – this Policy and Procedure can be used to raise such complaints and these may as necessary be referred into SIRM's HR procedures (including, where relevant, procedures under the Personal Relationships Policy) either immediately or following an investigation under this Policy, depending on the circumstances of the complaint.

- **Complaints that lawful Freedom of Speech has been restricted** – the procedures under this Policy can be used to raise a complaint of this nature but such complaints will normally be referred into the Freedom of Speech Complaints Procedure to be investigated and dealt with. Where a complaint is made under this Policy and Procedure comprising several different issues including that lawful freedom of speech has been restricted, SIRM may separate out those issues and refer such allegations them into the Freedom of Speech Complaints Procedure, or they may be considered under this Policy and Procedure together with the rest of the complaint.

- **Placement issues** – this Policy and Procedures can be used to make a complaint regarding any placement issues, however matters may as necessary be referred into a Placement Provider's complaints procedure where applicable. In this event, the procedures under this Policy will normally either be placed in abeyance or terminated.

Complaints that fall outside the scope of this Policy and Procedure

This Student Complaints Policy & Procedure does not cover the following types of complaint:

- **Academic Appeal** – this is a request for a review of a decision about student progression, assessment marks and awards. For these issues, the Academic Appeals Procedure should be followed.

    - Where a student lodges an academic complaint but SIRM determines it falls within the scope of an academic appeal, SIRM will normally refer that complaint into the Academic Appeals procedure. This may mean SIRM's consideration of the case is deferred until such time as the Academic Appeals procedure is normally applicable.

- Where a student lodges an academic complaint that is found by SIRM to be justified or partly justified and SIRM finds the appropriate resolution would require the setting aside of an academic result or decision already made and approved by an Examination Board in order that the work can be reassessed, the complaint may either:
  - be referred and fast-tracked into the later stages of the Academic Appeals procedure, or
  - SIRM may call for Chair's Action by the Chair of the Examination Board to set aside the original result. In such an instance, the work will be remarked and then ratified at the next available Examination Board.

- **Admissions Decisions or Issues –** appeals and complaints about an admissions decision or any issues with the admissions process cannot be made under this Policy and Procedure. They must be raised under the Admissions Appeals & Complaints Procedure within the relevant timescales published in that Policy.

- **Academic Judgement –** decisions of academic judgement, including fairness of marks awarded, cannot be challenged under this Policy and Procedure. Where a student believes that they may have grounds for a mark or marks awarded to be reviewed, the Academic Appeals procedure should be used.

- **Academic engagement, attendance monitoring, interruption or withdrawal decisions** – decisions taken under SIRM College's Student Academic Engagement Policy or Attendance Monitoring and Engagement Policy, including decisions relating to engagement requirements, interruption of studies, withdrawal, or Student Route sponsorship, are not normally considered under this Complaints Policy.

  Students must first use the relevant review or appeal processes set out in those policies and associated academic regulations before a complaint may be considered.

- **Student Misconduct and Disciplinary findings/penalties** – complaints/appeals against decisions, findings and/or penalties made under the Student Misconduct & Disciplinary Policy should be raised under the relevant appeal processes set out in that Policy.

- **Complaints regarding issues that are subject to legal action or investigation –** matters of complaint that are already or become the subject of legal proceedings or

Police investigations cannot be investigated under this Procedure until and unless such proceedings and investigations have concluded. Where such complaints are submitted, SIRM will either terminate this procedure or hold it in abeyance until the legal/police proceedings have been concluded, at which point SIRM will determine whether it is reasonable to reinstigate any procedures under this Policy. Where SIRM determines that such a complaint cannot be considered after legal/Police proceedings have concluded, a Completion of Procedures Letter will normally be issued, setting out the reason(s) for this decision.

- **External/Partner institution issues –** complaints about services or teaching delivered by partner organisations will not normally be considered, unless SIRM has some demonstrable responsibility regarding those issues. SIRM may refer any such complaints received to the partner organisation, either fully or in part, and where appropriate may work collaboratively with the partner organisation in ensuring the complaint is resolved. SIRM will apply this Policy and Procedures to those matters for which it holds responsibility in the event of such a complaint.

4. Advice and guidance on making a complaint

If a student is unsure who to raise a concern with in order to resolve the problem, advice can be sought from Student Support staff. Students are encouraged to seek guidance both before and during the use of this procedure from staff at SIRM, such as tutors, Course Leaders or Student Support staff.

As SIRM is a small organisation, if there is any possibility of a conflict of interest between the person from whom the student seeks guidance and individuals involved in investigating the complaint, all parties will be informed appropriately and SIRM will ensure alternative arrangements are in place to resolve this issue.

5. Anonymous complaints

SIRM will review all anonymous complaints received, however there is a strong likelihood that we will not be able to take any action as we have a duty to deal with allegations in a fair and reasonable way, in accordance with the principles of natural justice. Natural justice means:

- decision makers must come to matters without bias or a reasonable perception of bias;
- each party must have a fair hearing;
- the process must be completed without delay;

- and decision makers must make reasonable decisions and give reasons for those decisions.

Anonymous complaints that contain allegations against one or more individuals may not be able to be reasonably be investigated as anyone facing an allegation against them has the right to the full information concerning that allegation, including who is making it against them.

If we receive an anonymous complaint, whilst we are unlikely to be able to investigate or act on it, SIRM will always consider whether or not any action can and should reasonably be taken. This may include, for example, informing an individual that an anonymous allegation against them has been received and putting any appropriate support in place for that individual, or report a serious anonymous allegation to the Police following a risk assessment.

6. Vexatious, frivolous or malicious complaints

SIRM accepts that students may have valid concerns for which these procedures should be used. We also understand that students who have raised a complaint may be experiencing an increased level of stress or distress. However, all students and staff are expected to remain courteous, professional and respectful at all times throughout the course of the procedures under this Policy.

Where SIRM determines that a complaint has been made without foundation (frivolous), made in bad faith (vexatious and/or malicious), or when a Complainant's behaviour at any stage of these procedures falls below the standard expected of all students and causes stress and/or distress to any member of staff (vexatious), this will normally result in SIRM terminating the consideration of the complaint and these procedures.

Examples of vexatious, frivolous or malicious complaints include, but are not limited to:

- complaints that are obsessive or repetitive in nature
- complaints that are harassing of complaint investigators
- insistence on pursuing complaints in an unreasonable manner
- insistence on pursuing complaints that have no merit
- insistence on pursuing unreasonable and/or unrealistic outcomes
- complaints which are designed to cause disruption and/or annoyance
- unreasonable or disproportionate demands for compensation or redress
- demands for compensation or redress which lack any serious purpose or value
- 'counter-complaints' received in response to allegations where, on the balance of probabilities, if the allegations had not been raised those counter-complaints would

not have been made

7. Burden of proof

All decisions and findings reached at any stage of this Student Complaints Policy & Procedure are made on the **balance of probabilities**.

The balance of probabilities means that any decision-maker in these procedures (e.g. the Stage Two Complaint Investigator) must reach a conclusion - on the basis of the evidence considered – as to whether a reported issue/allegation has more likely than not occurred, in order to determine whether there is sufficient justification to uphold or partly uphold the complaint.

In reaching all decisions under this Policy and Procedure, decision makers at all stages will work with this burden of proof and will take into account whether it is more likely than not that any reported events occurred as has been reported.

8. Timescales

SIRM will follow the timescales and procedures published in this Policy. We will normally complete all complaints within 90 days of the date of receipt of a formal complaint. However, there can be circumstances when the complaint may unavoidably take longer than would normally be expected (eg if other procedures place this procedure temporarily on pause).

SIRM will ensure that students are kept informed in the event of any delay or deviation from the timescales published in this Policy, and that they receive regular updates so that they are aware we are still dealing with their complaint even where we have no further news at that time.

Summary of timescales under this Policy

Stage of Procedure	**Deadline / Timescale**
Stage 1 Informal Complaints	Should be raised by the Complainant(s) within 2 months after the issue(s) of complaint first arose
Stage 2 Formal Complaints	Should normally be submitted by the Complainant within 2 months of the date that the issue(s) of complaint first arose, even where the Complainant has been endeavouring to resolve the complaint issue(s) informally
Stage 2 Complaint Outcome Letter	Should normally be issued within 21 calendar days of the date of the full Stage 2 Complaint being received

Stage 3 Request for Review of Stage 2 Outcome	Should be submitted by the Complainant within 14 calendar days of the date of the Stage 2 Formal Complaint Outcome Letter
Stage 3 Request for Review Outcome Letter	Should normally be issued within 21 calendar days of the date of the full Stage 3 Request for Review being received
Completion of Procedures Letter	Issued within 28 days of the date of the Stage 3 Request for Review Outcome Letter, or in the event of the internal procedures not being exhausted, within 28 days of the date the Complainant's written confirmation that they are requesting a Completion of Procedures Letter is received.

9. Late informal (Stage 1) Complaints

Issues of complaint that are raised informally under Stage 1 of this procedure more than 2 months after the issue(s) of complaint first arose will normally be considered as a late complaint, unless they fall within the scope of the Harassment & Sexual Misconduct Policy, in which case they will normally be directed into the disclosure management procedures under that Policy.

Where a late informal complaint is raised with SIRM, reasonable endeavours will nonetheless be made to informally resolve the issue(s) of complaint. However, in the event that the issue(s) cannot be informally resolved to the satisfaction of the Complainant, they may submit a Stage 2 Formal Complaint together with an explanation of why they were unable to submit this within the normal 2-month deadline for making a Formal Complaint.

Students should be aware that efforts by SIRM to informally resolve a late Stage 1 Complaint are no indication that a late Stage 2 Formal Complaint will be accepted or considered.

10. Stage 2 Formal Complaints or Stage 3 Requests for Review submitted late

Late Stage 2 Complaints

Stage 2 Formal Complaints should normally be submitted within 2 months of the date that the issue(s) of complaint first arose, even where the Complainant has been endeavouring to resolve the complaint issue(s) informally. Where a formal Stage 2 Complaint is submitted more than 2 months after the date the issues first arose, this will normally be deemed to be a late complaint and thus ineligible for consideration at Stage 2. However, where a late Stage 2 Complaint is submitted and the Complainant has been endeavouring to resolve the

complaint informally with SIRM, the Principal will normally accept the complaint for consideration and appoint a Stage 2 Complaint Investigator.

In exceptional circumstances, the Principal will exercise their discretion and may determine that a late complaint should nonetheless be accepted for consideration.

Late Stage 3 Requests for Review

Stage 3 Requests for Review should be submitted within 14 calendar days of the date of the Stage 2 Formal Complaint Outcome Letter. Stage 3 Requests for Review received after this deadline will normally be deemed to be late and will not be accepted for consideration. In this event, SIRM will issue a CoP Letter to the Complainant (see Section 15 of this document 'The Office of the Independent Adjudicator and Completion of Procedures').

In exceptional circumstances, the Principal may exercise their discretion and accept a late Stage 3 Request for Review if they are satisfied that the case warrants this discretion.

B. SIRM Student Complaints Procedure

11. The Student Complaints Procedure

The Student Complaints Procedure is a three-stage procedure:

- **Stage 1: Informal Stage**
- **Stage 2: Formal Stage**
- **Stage 3: Request for Review**

Group complaints

Where a group of students wishes to make a formal complaint, the group should nominate a 'Lead Student' with whom SIRM will liaise regarding the complaint, and who will be responsible for submitting the Student Complaint Form to SIRM. The Lead Student is responsible for also ensuring that the Student Complaint Form is fully completed, that all students involved in making the complaint are clearly listed, and that the content has been agreed by all students involved in raising the Group Complaint.

When a Group Complaint is received, whilst SIRM will liaise with the Lead Student throughout the course of the Stage 2 procedure during the investigation of the complaint, and similarly during the Stage 3 Request for Review procedures, the Stage 2 Investigator or Stage 3 Reviewer will send the relevant stage outcome letter to all students involved in the complaint.

12. Stage 1: Informal Stage

Students are expected to try to use this informal stage of the procedure before progressing to the formal stage (Stage 2 of the Student Complaints Procedure). If, after attempting to resolve the issue informally the student is not satisfied, the issues can be escalated under the Stage 2 (the formal stage) of the Student Complaints Procedure.

However, for serious or complex complaints, SIRM recognises that it may not be appropriate for a student to endeavour to resolve their complaint informally. In this instance, students are welcome to escalate their case immediately to Stage 2 of the procedure (Formal Complaint), and should provide their reason(s) why they did not attempt to resolve the complaint at Stage 1 in the Student Complaint Form. The Stage 2 Investigator will review this information on receipt of the Student Complaint Form. Where the Stage 2 Investigator deems it appropriate, they may refer the complaint back to Stage 1 (see section Stage 2: Formal Stage for further details).

Stage 1 procedure

At Stage 1, the student should attempt an informal discussion with the student's tutor or the appropriate member of staff. Any resolution and/or agreements reached are likely to be done so in person/verbally, but the member of staff should normally follow up via email to confirm this and inform the student of their right to progress to Stage 2 of the Student Complaints Procedure if they are not satisfied.

Where the student does not want to, or cannot, raise a concern, or it has not been possible to resolve the matter via the informal approach, a formal complaint should be raised under Stage 2 of this Procedure. In this event, the student should explain in the Student Complaint Form their reason(s) for not pursuing the complaint under Stage 1.

13. Stage 2: Formal Stage

All Stage 2 formal complaints should be submitted using the Student Complaint Form, to the Principal who will either act as the Stage 2 Complaint Investigator or will nominate another member of staff to act as the Stage 2 Complaint Investigator. The student submitting the complaint will be referred to as 'the Complainant'.

A Stage 2 formal complaint should be submitted normally no later than 2 months after the issues of complaint first arising, in order to give the best opportunity for matters to be investigated as fully as possible. Incomplete Student Complaint Forms may be returned to the Complainant for completion and/or the Complainant contacted to provide the missing information, before the Stage 2 Complaint Investigation can proceed.

The Complainant should explain in the Student Complaint Form what steps they have taken to resolve the complaint so far. Where the Complainant has not endeavoured to resolve the issue(s) of complaint at Stage 1, they should clearly explain their reason(s) for not doing so. Where a complaint has been immediately escalated to Stage 2 of the procedure without an attempt to resolve it at Stage 1, the Stage 2 Investigator will determine whether or not it should be referred back into Stage 1 to attempt a swift, informal resolution (this will not always be appropriate).

Where a Stage 2 Complaint is referred back into Stage 1 by the Stage 2 Investigator, the Complainant will have the right to submit a fresh Stage 2 Complaint if they are not satisfied with the Stage 1 resolution of their complaint.

Stage 2 Procedure

- The Stage 2 procedure will normally be completed within 21 calendar days of the date that the Stage 2 Complaint Investigator receives the completed Stage 2 Student Complaint Form.

Stage 2 Investigation

- On receipt of the complaint, the Stage 2 Complaint Investigator will review the information submitted. They may request further evidence/information from the Complainant. They may, if they deem it necessary, interview the Complainant and/or any other parties as necessary in order to gather sufficient information to reach a decision regarding whether there are grounds that establish the complaint is justified, partly justified, or not justified.
- On completion of the Stage 2 Investigation, the Stage 2 Investigator will write to the Complainant with a Stage 2 Complaint Outcome Letter, setting out the following:
    - The issue(s) of complaint considered
    - What information and evidence was submitted by the Complainant
    - What information was requested and received/not received
    - What other evidence and information has been established during the investigation
    - Whether each issue of complaint is found, on the balance of probabilities, to be justified, partly justified or not justified
    - The overall outcome of the complaint (where there are multiple issues justified or partly justified ones alongside issues that are not justified, this will normally inform the overall outcome of the complaint as 'partly justified'. However, the Stage 2 Investigator has the discretion to determine whether the overall outcome of the complaint is 'justified', 'partly justified' or 'not justified', even where some issues are found to be partly justified or not justified.)
    - The Complainant's right to request a review of the Stage 2 Outcome under Stage 3 of the Student Complaints Procedure

Incomplete Stage 2 Student Complaint Forms

- If the form is incomplete, the Stage 2 Complaint Investigator will assess whether the complaint investigation can commence or whether more information is required before it can begin.
- If they determine that the form needs further completion by the Complainant, the Stage 2 Investigator will write to the Complainant setting out which sections of the Student Complaint Form need completing, together with any other information/evidence, and will state a deadline by which this information should be received.

- If they determine that more information is required, the 21-day timescale will restart from the date that the completed Student Complaint Form/further information is received by the Stage 2 Complaint Investigator. In the event that no completed form and/or no further information is received by the stated deadline for submitting it, the 21-day timescale will commence from that date.
- If, having requested it, a completed form is not received within the timeframe, the Stage 2 Complaint Investigator will determine whether they can proceed with the investigation. They may determine that there is insufficient information/evidence to commence their investigation, in which case they may terminate consideration of the complaint, giving their considerations and reasons for terminating it.

14. Stage 3: Request for Review

Stage 3 of the Student Complaints Procedure allows complainants to request a review of the Stage 2 outcome, including a review of either or both of the Stage 2 Investigator's decision(s) and/or finding(s). A request for a review is not a request to automatically overturn the Stage 2 decision and/or findings; rather, it is a request for the Stage 2 decision and/or findings to be looked at again. There must be a basis for SIRM to review the Stage 2 decision and/or findings, therefore specific grounds must be met to warrant a review.

Individual Complaints at Stage 3

A request for a review should be made using the Form Stage 3: Request for Review of a Stage 2 Complaint Outcome (STAGE 3 INDIVIDUAL COMPLAINT FORM).

Group Complaints at Stage 3

A request for a review should be made using the Form Stage 3: Request for Review of a Stage 2 Group Complaint Outcome (STAGE 3 GROUP COMPLAINT FORM).

Submission of Stage 3 Requests for Review

Whether it is made on an individual or group basis, a Stage 3 submission should contain the following:

- A fully completed Stage 3: Request for Review of a Stage 2 Complaint Outcome Form
- A copy of the Stage 2 Outcome Letter
- A copy of the original submitted Stage 2 Complaint Form
- Any new evidence that the Complainant wishes to submit, which was not considered with the original Stage 2 Complaint

A Complainant will not normally be required to resubmit supporting evidence that was already submitted with the Stage 2 Complaint, unless this is expressly requested by the Stage 3 Reviewer when they come to consider the Stage 3 Request for Review. However, a Complainant may include or draw attention to any evidence that was submitted with the Stage 2 Complaint, as part of their Stage 3 submission, if they believe this to be material to their Request for a Review.

A Request for a Review can be made under one or more of the following grounds:

i) that there is new evidence that could not have been, or for good reason was not, made available at the time of the investigation of the Stage 2 complaint, and that there is sufficient evidence that the complaint warrants further consideration;

ii) that evidence can be produced of significant procedural error in the investigation of the Stage 2 complaint, including allegations of prejudice or bias, and that there is sufficient evidence that the complaint warrants further consideration.

iii) that the Stage 2 Outcome is unfair and/or has or will likely have a disproportionate impact on the Complainant.

Stage 3 will normally be conducted by the Principal or their nominee as the Stage 3 Complaint Reviewer. They will consider whether, on the balance of probabilities, any of the grounds have been met. If so, they may order one of the following:

a. That the original Stage 2 Complaint decision and/or findings should be partly amended

b. That the original Stage 2 Complaint decision and findings should be overturned and replaced with an entirely new decision/outcome

c. That notwithstanding that the grounds have been met, there is insufficient justification to amend or overturn the original Stage 2 Complaint decision and findings

Exceptional ground for review

Where the Stage 3 Complaint Reviewer finds that neither of the grounds have been met but is satisfied that there are other considerations which in their view warrant a revised complaint decision and outcome (for example, if a Stage 2 Complaint Outcome has imposed or will impose an unintended avoidable disadvantage on the Complainant), they may exceptionally exercise their discretion to either:

a. amend part of the original Stage 2 Complaint decision and/or outcome

b. overturn the original Stage 2 Complaint decision/outcome and replace it with an entirely new decision/outcome.

Timescales for a Stage 3 Request for Review

A Stage 3 Request for review should be submitted via email by the Complainant to the Principal within 14 calendar days of the Stage 2 Complaint Outcome Letter.

The Principal's Stage 3 Complaint Review Outcome letter will normally be completed within 21 calendar days of the date of receipt of the Stage 3 Request for Review submitted by the Complainant.

15. Academic complaints - right of final appeal

In the event of academic complaints relating to a programme delivered in partnership with an awarding or validating body, the complainant will be informed of their right to make a final appeal to the relevant awarding or validating partner, together with instructions on how to do this. If this avenue is followed, the final outcome issued by the awarding or validating partner will be copied to SIRM, who will then proceed to issue a Completion of Procedures Letter (see section 16 'The Office of the Independent Adjudicator and Completion of Procedures').

16. The Office of the Independent Adjudicator and Completion of Procedures

The Office of the Independent Adjudicator for Higher Education (OIA) runs an independent scheme to review student complaints. SIRM is a member of this scheme. If a student is unhappy with the outcome, they 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 can't look at and what it can do to put things right if something has gone wrong here: **https://www.oiahe.org.uk/students**.

Students normally need to have completed Stage 3 of this Student Complaints Procedure before they can complain to the OIA. At the end of the procedure, SIRM will issue the Complainant with a letter called a "Completion of Procedures Letter" where there are no further steps that the Complainant can take internally.

If the complaint is not upheld, SIRM will issue a Completion of Procedures Letter automatically. If the complaint is justified or partly justified, the Complainant will be informed that they can request a Completion of Procedures Letter if they want one. More information about Completion of Procedures Letters can be found here: **https://www.oiahe.org.uk/providers/completion-of-procedures-letters**.

Students must make their complaint to the OIA within 12 months of completing this procedure. The 12-month period will normally run from the date of the Completion of Procedures Letter.

Completion of Procedures Letter (CoP Letter)

The Completion of Procedures Letter issued by SIRM will include:

- A summary of the complaint or appeal the student has made to SIRM;
- The title and year/version of the regulations/procedures that were applied;
- A summary of the issues considered at the final stage of the internal procedures (or, in the event of early termination of procedures, what was considered at the stage the internal procedures reached);
- The final decision taken by SIRM;
- The reasons for that decision;
- Information about the role of the OIA;
- The deadline for bringing a complaint to the OIA.

SIRM may, where relevant, include a summary of issues which were raised but not pursued by the Complainant, to identify any issues that have not completed its internal procedures.

The COP Letter will also draw the student's attention to any factors which SIRM is aware of that mean that it is particularly important for the student to bring the complaint promptly to the OIA. Examples of such factors are:

- The student is subject to deadlines for completing the course;
- The course or module the student is studying is being discontinued, or the programme is in teach out;
- The remedy the student is seeking will be impossible to implement after a certain date;
- The student has indicated that they intend to bring judicial review proceedings against the provider if they are dissatisfied with the outcome of the OIA's review.