LONDON SCHOOL
OF SCIENCE & TECHNOLOGY

Student Complaints Policy and Procedures (RUL Registered Students)

Version 3.0

Approved by the Board of Governors

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This document sets out the School's policy and procedures for responding to students' concerns and complaints about the standard of service provided by the School.

It has been reviewed and developed in line with *England's Regulatory Framework for Higher Education* and takes on board the Code's accompanying guidance with regard to Complaints, Concerns and Appeals; due regard is also given to:

i. *The Competition and Market Authority's UK higher education providers – advice on consumer protection law.*
ii. *The Office of the Independent Adjudicator (OIA)'s Good Practice Framework*

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1. INTRODUCTION

1.1. Purpose and Scope

1.1.1. A student may decide to make a complaint if they feel dissatisfied with a service they have received and they wish for the issue to be investigated.

1.2. Responsibility for Complaints

1.2.1. Where complaints concern processes or services are directly associated with the awarding body, Ravensbourne University London (RUL), services, processes and resources, students should raise a complaint with them directly using the RUL Student Complaints procedure. Should a student submit a complaint to London School of Science and Technology (LSST), which should be directly handled by RUL, the LSST Registry department may refer the complaint to RUL on behalf of the student for management and investigation. If this is the case, the student will be notified that this action has been taken.

1.2.2. Complaints relating to the London School of Science and Technology services, resources or processes should be raised directly with LSST and will be handled in accordance with this policy. Should a student remain dissatisfied with the outcome of their complaint by LSST, the student can request a review of the complaint outcome with the awarding body RUL. In equal measure, should LSST determine that the complaint be better handled by RUL in accordance with the partnership agreement, LSST reserves the right to refer the complaint and student to RUL for further management and investigation.

1.2.3. If a student is unsure under which procedure and institution to raise a complaint or needs further guidance regarding the LSST complaints process and procedure, they can contact the LSST Registry Department (registry@lsst.ac) for guidance.

1.3. Complaints for Former Students and Time Limits

1.3.1. This procedure is available to former students three months after graduation, starting from the receipt of the Final Assessment Board's decision. The three-month period from the date of the considered withdrawal applies if a student has requested a self-withdrawal or if they have been removed from their studies for non-academic reasons, such as after a disciplinary procedure.

1.3.2. Complaints received from former students after the three months will be considered “Out of Time”. However, should the student be able to provide reasonable explanation for the delay in submitting their complaint, and the complaint handler deems the investigation to still be possible, the complaint can be accepted. Late complaints will be considered on a case-by-case basis, and LSST will make every effort to accommodate the student where possible.

1.4. Complaints Referred to Another Procedure

1.4.1. LSST, may, at any stage, consider a complaint under another procedure if another process is considered more appropriate. Therefore, any evidence or information submitted

as part of the complaint will be considered as available for consideration under this new procedure. If this is the case, the student will be informed as to why this has been decided and guided to relevant information and support on the new process being adopted to manage their case.

1.4.2. Where more than one procedure may apply, LSST will consider how the processes should be managed to avoid unnecessary duplication and delay and will keep the student informed of how their concerns will be addressed.

1.5. Complaints Made in Bad Faith

1.5.1. Complaints which are deemed malicious or unprofessional will be considered carefully and may be rejected upon receipt. In cases where the complaint must be rejected on these grounds, written reasons for this rejection are provided to the student. Students who have submitted a complaint of this nature may be subject to disciplinary action in accordance with the *School's Student Code of Conduct and Disciplinary Procedures for RUL Registered Students*.

1.5.2. A malicious complaint is one that is made with the intention of causing harm, e.g., deliberately seeking to defame a member of staff or student and raising a complaint with this intent; a dishonest account of an issue or incident in the knowledge that this will cause harm; knowingly basing a complaint on false information with the intention of causing harm. A complaint which has become malicious at later stages of the procedure is defined as: one that the investigation has shown to be without foundation (based on falsified information/evidence); one where the investigation evidence demonstrates that the complainant knowingly lied to the Investigation Officer; and there is sufficient evidence to demonstrate this at a disciplinary hearing on the basis of the balance of probabilities.

1.5.3. Where a formal complaint is considered potentially frivolous or vexatious, the Registrar, or a nominee, will review the complaint and make a decision within 10 working days.

1.5.4. Following the review, the Registrar or nominee will determine whether the complaint should proceed under the formal complaints process or whether it meets the criteria for being considered frivolous or vexatious. Where a complaint is determined to be frivolous or vexatious, the University may dismiss the complaint and/or consider whether it is appropriate to initiate relevant disciplinary procedures.

1.5.5. The student will be informed in writing of the decision and the reasons for it, including any action to be taken. The student may request a review of the decision through the University's Appeals Procedure.

1.5.6. A complaint will not be considered to have been made in bad faith simply because it is not upheld, because there is insufficient evidence to support it, or because the student has made an error or provided information that is later found to be inaccurate.

1.6. Support and Representation

1.6.1. In most cases students should submit a complaint themselves, however, on occasions where a complaint is to be pursued by a third party, for example, a parent or guardian, the student must provide written confirmation, either by email or letter, confirming their student

ID number and stating their permission for a third party to act on their behalf before the complaint will be considered. The student may withdraw permission for a third party to act on their behalf at any time. Where permission is withdrawn, LSST will normally communicate directly with the student and allow them to continue the complaint themselves or nominate another representative. The complaint will not automatically be rejected solely because permission for the original representative has been withdrawn. LSST will not take any responsibility for the actions of the third party.

1.7. Group Complaints

1.7.1. Where several students have the same or substantially similar concerns, they may choose to submit a group complaint. LSST may accept a complaint as a group complaint where it is appropriate to consider the concerns together.

1.7.2. If a group complaint is accepted:

- **Group representative:** The students should agree on one student to act as the group representative and main point of contact with LSST. The representative will receive and share information about the complaint and communicate with LSST on behalf of the group.

- Where a group of students is large, the School may request that more than one representative is nominated. If the students are unable to nominate a representative, the School may appoint a Student Union Officer to act as their representative.

- A complaint may initially be submitted as a group complaint. Where appropriate, LSST may divide the group into smaller subgroups to ensure that the complaint can be investigated effectively and managed appropriately. Where members of the same group have been affected by the issue in different ways, the University may consider and offer individual remedies where appropriate, considering the circumstances of each student.

- **Consent:** Each student who wishes to participate in the group complaint must provide written consent to be represented by the chosen representative. The consent must include the student's name and student ID number, together with the name and student ID number of the representative.

- **Role of the representative:** The group complaint representative is responsible for coordinating communication with LSST and keeping the represented group informed. The representative does not have authority to make decisions about the complaint or its outcome on behalf of another student.

- **Investigation:** Where the concerns are the same or substantially similar, LSST will normally investigate them together. This is intended to avoid unnecessary duplication and ensure that the concerns are considered consistently. Where students have different circumstances or concerns, LSST may consider these separately where appropriate.

- **Individual concerns:** A student may raise concerns that are specific to their individual circumstances separately from the group complaint. LSST may determine that substantially similar concerns should be dealt with through the group complaint process to avoid duplication.

- **Confidentiality:** Students participating in a group complaint should be aware that information relevant to the complaint may need to be shared with other members of the group. LSST will handle personal information in accordance with our Student Data Protection Policy.

- **Joining or leaving a group complaint:** Students may choose whether to participate in a group complaint and may withdraw from the group at any stage. A student who does not provide consent will not be included in the group complaint. Where appropriate, LSST will provide information about any alternative route available to a student who does not participate in, or withdraws from, the group complaint.

- **Group Complaint Outcome:** The outcome will be communicated to the group complaint representative.

- **Individual choice and further review:** Each student will have the opportunity to consider the complaint outcome and decide whether they are satisfied with it. Where a student remains dissatisfied, they may pursue any further review available under this complaint's procedure. The decision of the group representative will not prevent an individual student from exercising their right to further review.

1.8. Completion of Procedures

1.8.1. Where the student has reached the final stage of the complaint stages, a Completion of Procedures (COP) letter will be issued to each student participating in the complaint where the outcome was not upheld. Where the outcome is upheld, the students can request a COP, which will be issued within 28 days of the COP request or automatically following a not upheld outcome.

1.8.2. Should any student, whether as part of a collective complaint or as an individual complainant feel coerced, forced, bullied or pressured into making a complaint or accepting a representative for a complaint by any fellow student, they should contact registry@lsst.ac for guidance and support.

1.8.3. Should any student, whether as part of a collective complaint or as an individual.

1.9. Complaints Involving Staff Members

1.9.1. In general, complaints raised will be considered as being against LSST and not against an individual member of staff. Any resolution achieved, including written apology, will be offered by the School, opposed to being from the individual member of staff involved. If a complaint is the direct result of the inappropriate conduct of a member of staff, the complaint will be raised to stage 2, Formal stage, upon receipt for investigation. Should staff's conduct be in breach of the LSST Employee Code of Conduct, the matter will be escalated to the LSST Human Resources (HR) Department, who will decide the further

actions to be taken. HR investigations will remain private and confidential in accordance with HR policies, and the complainant should receive clear information on the level of information they will or will not receive, if any, on conclusion of the HR investigation.

1.10. Anonymous and Confidential Complaints

1.10.1. LSST may receive complaints or concerns from students, former students, staff members or other individuals. Anonymous complaints or concerns will be considered on a case-by-case basis, considering the material provided and whether there is sufficient information or a compelling reason for further action or investigation.

1.10.2. Where a complainant has provided their identity but requests confidentiality, LSST will handle the complaint confidentially as far as possible and will limit disclosure of their identity to those who need the information to investigate or respond, subject to any legal, safeguarding or other legitimate requirement to disclose information.

1.10.3. Anonymity or confidentiality may limit LSST's ability to investigate or provide a detailed outcome. Where appropriate, LSST will explain these limitations to the complainant.

1.10.4. Where a complaint or concern is raised anonymously by a third party, LSST may consider the matter under an appropriate procedure. An anonymous complainant will not normally be able to receive an outcome, a request for review opportunity or a Completion of Procedures Letter or pursue the matter with the Office of the Independent Adjudicator (OIA).

1.10.5. LSST may take appropriate action where anonymous information raises concerns requiring further consideration, including safeguarding, serious misconduct, discrimination, harassment or health and safety concerns.

1.11. Alternative Ways to Raise Concerns

1.11.1. For any concerns regarding a course, students are encouraged to share their feedback through designated channels, such as the termly Student Voice Committee (SVC).

1.12. Mediation and Early Resolution

1.12.1. In certain situations, it might be most effective to resolve the issue through Mediation. The Registry Department may refer students to Mediation to effectively address the concerns that have been raised.

1.13. Considering Formal Resolution

1.13.1. In specific circumstances, it may be suitable to escalate the complaint directly to the formal complaints process, bypassing the informal stage, particularly in cases of a conflict of interest. When this is under consideration, it is advisable to consult the Registry Department for guidance.

1.13.2. If a student believes the issue at hand is too serious for informal resolution, they have the option to initiate their complaint at Stage 2 of this procedure. The Registry

Department has the authority to refer these cases to the appropriate team for an informal resolution.

1.14. Definitions and Delegated Authority

1.14.1. Where the term 'Registrar' is referenced in this policy, this includes the authorised nominee from the Registry department. In most cases, this will be the Assistant Registrar or designated registry officer.

2. PRINCIPLES FOR HANDLING STUDENTS' COMPLAINTS

2.1. The London School of Science and Technology (LSST) strives to provide a high-quality academic experience and encourages students to raise concerns with the School where they feel the standard of any aspect of their learning experience is below their expectations.

2.2. The School will consider students' concerns and complaints at three stages:

- Stage 1: Early (informal) Resolution
- Stage 2: Formal Complaint Procedure
- Stage 3: Review of Formal Complaint Procedures

The full complaints procedure is given in Section 3.

2.3. The School will seek to resolve all complaints and concerns promptly in the first instance through informal dialogue between those directly involved. Otherwise, students can address any comments or concerns with their course leader or the responsible staff member (e.g., Student Support Officer, Registry Officer, etc.). If a student is uncertain about whom to approach with a complaint, the Complaints Manager can direct them to the appropriate individual or facilitate a meeting with the relevant staff member. When a student consults with a staff member, it is essential to clearly articulate their concern and provide a thorough explanation. The staff member will determine whether they are the suitable individual to address the concern or if it should be escalated to another person or department as a formal complaint.

2.4. Where informal conciliation is not possible or has been unsuccessful, students should make a formal complaint. The Registrar reserves the right to request from the complainant a summary and details of the attempted informal resolution before proceeding with the formal process. Should the Registrar conclude that no informal resolution has been attempted, the Registrar may revert the complaint back to the first stage to allow for an early resolution. Should this be the case, the complainant will be notified accordingly by email or letter. If stage one informal resolution proves unsuccessful, the complainant can submit a formal complaint to the Registrar to be considered via stage 2 Formal Complaint procedure. The

90-calendar day timeframe will normally begin from the date the formal complaint is received by LSST and enters the formal stage.

2.5. The School will ensure that procedures for dealing with formal complaints are fair and transparent to all parties and that complaints are resolved in a timely fashion; where possible the School will seek to resolve all formal complaints fully (including any review under Stage 3) within 90 calendar days of the receipt of a formal complaint.

2.6. Students will be kept informed of the progress and outcome of the School's investigation of their formal complaints. Where a complaint takes longer than 90 calendar days to resolve, the complainant will receive an explanation for this and be given an indication of how long the issue is likely to take to fully resolve.

2.7. Complaints which possess multiple concerns relating to multiple departments, or different areas of the School may require additional time to investigate, as each area may require their own separate investigation. While LSST will make every effort to avoid delays in the complaint outcome being achieved, should there be a delay or requirement for different timescales for different areas of the School subject to their resources and availability, the student will be notified.

2.8. Should a student obtain new evidence part-way through a complaint investigation, the complaint handler will decide whether this evidence can be considered. Evidence which raises new concerns and does not relate to the original concern raised cannot be considered. Evidence which is received late and relates to the original complaint, may lead to increase in time taken to resolve the complaint, as new investigation may be required. The student will be notified should this be the case and informed of the estimated additional time required.

2.9. All complaints will be taken seriously and investigated in the spirit of natural justice; no student will be at a disadvantage for having made a genuine complaint, even where the complaint is found to be without merit, provided it has been made in good faith. Any person about whom a complaint is made shall be supplied with a copy of the complaint and given the opportunity to make their representations.

2.10. The School will ensure that advice and guidance on making a formal complaint is clearly accessible to all students and prospective students. Where requested, Student Support staff will guide students through the process of making a formal complaint.

2.11. Anonymised information about the quantity and substance of students' complaints will be used by the School to reflect on its performance in the delivery of learning opportunities and to drive continuous enhancement of the services it provides.

2.12. The School shall maintain a record of all complaints made by students relating to the course and the outcome of each complaint.

2.13. Where a complaint progresses to the final review stage with RUL and the outcome is not upheld, RUL will issue a Completion of Procedures (CoP) Letter at the end of the Review Stage.

3. SCOPE OF LSST'S COMPLAINTS POLICY

3.1. Important

3.1.1. LSST delivers learning opportunities under validation and franchise agreements with external awarding bodies, with whom it works to resolve students' formal complaints. The procedures for submitting formal complaints vary depending on the course a student is enrolled on.

3.1.2. Students on courses leading to awards from **Ravensbourne University London (RUL)** should use this policy and its procedures only in the first instance, except in the instance where the complaint relates to the awarding body's services. In the case of any misconduct, other than academic misconduct that requires disciplinary action, it shall be investigated, only in the first instance through the School's Disciplinary procedures.

3.1.3. Complaints regarding LSST processes, resources, staff, and services will be handled under the first and second stages of this process: Informal/Early Resolution and Formal Complaint Procedure. Should the student be dissatisfied with the outcome following conclusion of both stages, the student may wish to raise Stage 3: Request for Review with the awarding body, RUL. Students interested in raising a review of their Stage 2 complaint outcome with the awarding body should submit a Review Request to complaints@rave.ac.uk within 10 working days of the outcome of the Formal Complaint received from LSST. All evidence to support the complaint should be included along with this request. Students who submit this request are agreeing to any information and evidence they submit as part of Stage 2 being shared as is necessary to process the Request for Review.

3.1.4. In some cases, a Request for Review (RfR) (Stage 3) will not be accepted by RUL. This may be in the case where complaints are solely based upon staff breach of LSST conduct and/or HR has been involved at formal stages. In these cases, RUL will refer the Request for Review back to LSST, and LSST will complete Stage 3. Should this be the case, RUL and LSST will notify the student of this update and the next steps.

3.1.5. LSST will work with its awarding body partners to ensure that all complaints are dealt with in accordance with standards as set out in the *Office of the Independent Adjudicator (OIA)'s Good Practice Framework.*

3.1.6. Where a student is in doubt about how to submit a formal complaint, they should consult a member of the Student Support team, who will guide them through the correct process.

4. DEFINITION OF A COMPLAINT

4.1. For the purpose of this policy, a complaint is defined as:

‘An expression of dissatisfaction by one or more students about a provider’s action or lack of action, or about the standard of service provided by the School’.

4.2. This procedure is designed to deal with complaints arising from, but not limited to:

- Provision of academic services described in the School’s publications including teaching, content of courses and support for learning.
- Incorrect or misleading information about services provided by the School.
- Provision of other services described in literature published by the School.
- Problems with the provision, condition or accessibility of School facilities or learning resources.
- The conduct of our staff or of any contractors we empty.
- Any perceived inequitable treatment of individuals or unlawful discrimination*.

  **Serious instances of discrimination, bullying, harassment or victimisation may warrant a separate investigation under LSST’s Anti-bullying and Harassment procedures.*

4.3. Examples of what the student complaints procedure does not cover:

- Complaints about admissions procedures prior to enrolment as a student at the School, which are dealt with separately under the School’s *Admissions Policy*.
- Any matters relating to examination and assessment procedures or academic appeals, which are dealt with through the *Appeals Policy*.

4.4. Complaints received about the behaviour of other students will normally be considered under the School’s Code of Conduct and Disciplinary Procedures, except where they are indicative of a failure by the School to provide a safe and respectful study environment in accordance with its own policies. The Registrar will use discretion in determining the most appropriate procedure under which to consider such complaints.

4.5. Where a complaint relates to a separate request, such as a change of class or an adjustment to a student’s learning arrangements, LSST will consider whether the request can be processed while the complaint is ongoing. A complaint will not automatically prevent the request from being considered. Where necessary, LSST may put appropriate interim arrangements in place while the complaint is investigated, particularly where this is required to protect the student’s safety, wellbeing or access to learning. Any decision to defer a

related request will be based on the circumstances of the case and communicated to the student with reasons.

5. THE COMPLAINTS PROCEDURE

5.1. Stage 1: Early (Informal) Resolution

5.1.1. **Raising a Concern**

5.1.1.1. Where a student wishes to discuss a concern before making a formal complaint, they should consult their Personal Tutor, a Student Union Representative or a member of the Student Support or Registry Team.

5.1.1.2. A concern may be raised verbally, in writing or by email. Students are encouraged to raise concerns as soon as reasonably possible, ideally within 10 working days of the incident or action giving rise to the concern. This is an indicative timeframe intended to support prompt resolution and is not an absolute deadline for raising a concern.

5.1.1.3. LSST may consider concerns raised later, taking account of the explanation for the delay, the nature of the issue and whether an effective resolution remains possible. Where a concern is more appropriately addressed through Stage 2 or another institutional procedure, the student will be advised accordingly.

5.1.2. **Timeframe for Informal Resolution**

5.1.2.1. School staff will work with the complainant to resolve concerns promptly and decisively without resorting to the formal complaints process. Where a formal complaint is received and it is unclear whether informal resolution has been attempted, LSST will consider whether referral to Stage 1 is appropriate. The student will not normally be referred back to Stage 1 where the nature, seriousness or circumstances of the complaint make informal resolution inappropriate, or where doing so would cause unreasonable delay or prejudice a fair investigation.

5.1.2.2. The member of staff receiving an informal complaint will attempt to resolve the matter there and then or refer the matter on to someone who can assist. The staff member in receipt of a students' complaint raised informally at stage 1, must address informal complaints within 10 working days, providing a summary of the decision and the rationale for that decision. In cases where the investigation is expected to extend over a longer duration, it is essential for staff to maintain communication with students regarding the progress and anticipated timelines for a resolution.

5.1.2.3. If resolution of a concern cannot for any reason be reached informally between the affected parties, or the complainant has not received any communication within the 10-working day period, the student should submit a formal complaint.

5.2. Stage 2: Formal Complaints Procedure

5.2.1. **Independence and Impartiality**

5.2.1.1. The School will ensure that when handling complaints, decision-makers will come to the matter afresh and will have no prior involvement in the complaints or issues raised. This ensures fairness, maintains objectivity and avoids bias in the process. In most cases the Registrar will act as Complaints Manager, however, where this is not possible, a suitable substitute Complaints Manager will be assigned.

5.2.2. **Submitting a Formal Complaint**

5.2.2.1. Formal complaints should be directed to the LSST Registry Department, in writing (letter or email). as soon as possible after informal efforts to resolve it have concluded or within 40 calendar days of the issue that prompted it. Complaints received after the advised time may be considered 'out of time' and will be investigated only where:

- There are valid reasons the complaint could not have been raised then followed by a justification, substantiated by supporting evidence, that demonstrates why the complaint could not be raised within the designated timeframe, or

- The complaint is made as soon as possible after the informal efforts have concluded, and there is clear evidence that substantive efforts were still being made to address the issue informally beyond the timescale.

5.2.2.2. Where appropriate, LSST may request supporting evidence for the reason for the delay. Any decision to accept or reject a late complaint will be made on a case-by-case basis, and the student will be informed of the decision. It is preferred that students use the Student Complaint Form available on the VLE or from Student Support. If providing the School with a physical copy of the complaint, the following address should be used:

F.A.O. Head of Registry,
The London School of Science and Technology,
First Floor, Memo House,
Kendal Avenue,
Park Royal,
W3 0XA

5.2.2.3. Or the complaint can be submitted electronically to: registry@lsst.ac or using e-forms on the student portal or available here: https://lsst.jotform.com/app/uk/LSST

5.2.3. **Information for Stage 2-Formal Complaint**

5.2.3.1. When submitting a formal complaint, the complainant should provide the following details where relevant:

- The complainant's name and student ID number (if a student).

- A full statement of the substance and circumstances of the complaint and all persons involved (if known).

- Brief details of the steps already taken to resolve the complaint (early resolution), including those involved (if known) and the date stage 1 informal resolution was completed.

- Reasons for the complainant's dissatisfaction with the attempts to resolve the complaint informally and providing proof of efforts made to address the matter informally.

- The desired outcome or resolution they would like LSST to consider (i.e., what resolution does the complainant seek).

- Copies of any documentary evidence the complainant wishes to submit (original copies should not be provided).

- A preferred means of contacting the complainant on the issue; this will be on their LSST email account for Students unless otherwise stated. If alternative details are provided by the complaint, these must be those of the complainant and not details for another person.

- Where a student requires a reasonable adjustment to enable them to submit or participate in the complaints process, LSST will consider the request in accordance with the Reasonable Adjustments Policy.

5.2.4. **Initial Assessment of a Formal Complaint**

5.2.4.1. Upon receipt of a formal complaint, the Registrar/Complaint Manager will evaluate whether the raised matter falls within the definition of a complaint as outlined above and whether it should be addressed through a distinct procedure, such as the Student Discipline or Appeals procedure. The applicant will be directed to the appropriate policy if the matter is not within this procedure's scope. The initial complaint review will consider the following:

- Does this complaint or concern need to be managed under another procedure/process?

- Has early resolution been attempted already, or can this complaint be referred for early resolution?

- Has the complainant provided a clear explanation of the reason for the complaint, and the area/department of the School involved?

- Has the complainant provided relevant, clear supporting evidence to accompany their complaint?

- Has the complainant stated the resolution they wish to be achieved, and is this manageable/reasonable?

- Does this complaint involve any concerning content which may need to be addressed following another process either instead of/or in conjunction with this procedure, e.g., safeguarding?

- Is the complainant aware of, or have they accessed any additional support services available to them while their complaint is under investigation, e.g., Student Union Centre?

5.2.5. **Acknowledgement and Further Information**

5.2.5.1. The Registrar/Complaints Manager will determine whether all the necessary information has been provided and may contact the student requesting additional details and evidence where required. In all cases the Registrar/Complaints Manager will acknowledge receipt of the complaint by letter/email.

5.2.5.2. If early resolution has not been attempted, the Registrar/Complaints Manager will forward the complaint to the appropriate person or department within the School to carry out the early resolution stage.

5.2.6. **Progression to Formal Investigation**

5.2.6.1. Complaints submitted to the Registry, where evidence of early resolution has been provided and all other criteria has been met, will be accepted for formal stage 2 procedure. Complaints accepted for formal stage will be assigned an appropriate investigatory officer by the Registrar/Complaints Manager, who will investigate the matter using the information provided by the complainant in their written submission. The assigned investigatory officer will have had no previous involvement in the complaint or related incident or action from which the complaint arises.

5.2.7. **Appointment of the Investigating Officer**

5.2.7.1. After the Registrar/Complaints Manager has conducted an initial review of the complaint, and assigned an investigatory officer, the Registrar/Complaints Manager will notify the complainant of complaint receipt and the name and contact details of the investigatory officer assigned.

5.2.7.2. The complainant will have three working days from notification of the appointed Investigating Officer to raise any concerns regarding the officer's independence, impartiality or potential conflict of interest. Any concern should explain the reasons for the objection. The Registrar or nominee, or another suitably independent decision-maker where necessary, will consider the concern and decide whether an alternative Investigating Officer should be appointed.

5.2.7.3. The complainant is not entitled to select their preferred Investigating Officer, and a request for a change will not automatically result in reassignment. Where a concern

about impartiality arises later in the process, the student may raise it as soon as reasonably practicable, and LSST will consider it in light of the circumstances.

5.2.7.4. If no concern is raised within the initial three-working-day period, the investigation will normally proceed with the appointed officer. This does not prevent LSST from addressing a subsequently identified conflict of interest or other substantive concern about the fairness of the investigation. Any reassignment may affect the investigation timescale, and the student will be informed of any resulting delay.

5.2.7.5. LSST will normally aim to issue the formal Stage 2 outcome within 40 calendar days of accepting the formal complaint for investigation. This target includes the investigation and preparation of the outcome, subject to the circumstances of the case. Where the target cannot be met, the student will be notified of the reason for the delay, the revised expected date and any further progress updates that will be provided.

5.2.7.6. Where it is felt that the complaint is unfounded, the complainant will receive an explanation as to why this is the case. In certain circumstances where a complaint is partially upheld, the Registry may take a discretionary approach in making a conciliatory or goodwill gesture.

5.2.7.7. If the substance of the complaint is concerning, then the Registrar/Complaint Manager may discuss the formal complaint with other relevant departments or staff members to seek guidance and to determine the most appropriate person to handle the complaint. For example, complaints which contain evidence, or statement of safeguarding or prevent concern.

5.2.7.8. The formal outcome letter will be issued by the Registry Department following the required review and approval of the investigation findings. The outcome letter and investigation report should be issued together wherever practicable. Any additional time required for approval or issue of the outcome will be communicated to the student.

5.2.7.9. Where appropriate, the outcome will identify remedial actions, the person or department responsible for carrying them out, and the expected completion date. Outstanding remedial actions will not prevent the student from exercising their right to request a Stage 3 review within the applicable deadline.

5.2.8. **The Investigation Procedure**

5.2.8.1. The investigation will be carried out by the appointed investigating officer, who will review the complaint documents and determine the best method to proceed with the investigation based on the information available.

5.2.8.2. The Investigating Officer will seek to contact the complainant within 10-working days of their appointment to confirm the main issues outlined in the complaint and to provide an expected outcome date.

5.2.8.3. The Investigating Officer is required to provide regular updates to the complainant on the progress of the investigation, particularly if there are any delays.

5.2.8.4. In certain cases, to assist with the investigation, the Investigating Officer may choose to hold meetings with relevant parties, including the complainant and/or any employee or student involved in the case.

5.2.8.5. Where appropriate, the Investigating Officer may request written witness statements or speak with individuals who may have relevant information about the complaint. Any witness evidence considered as part of the investigation will be assessed alongside the other evidence and, where relevant, reflected in the investigation report.

5.2.8.6. The Investigating Officer will normally aim to complete the investigation within 25 working days of receiving the complaint and the information required to commence the investigation. The timescale may need to be extended where the complaint is complex, involves multiple departments or parties, requires additional evidence, or is affected by the availability of relevant individuals.

5.2.8.7. Where an extension is necessary, the student will be informed of the reason for the delay, the action being taken to progress the investigation and the revised expected date for the outcome. The Investigating Officer will provide further updates where there is a material change to the expected timeframe.

5.2.8.8. LSST will aim to resolve the complaint promptly and, where possible, complete the overall complaints process within 90 calendar days of the formal complaint being accepted. This is an overall target rather than a guarantee that every case will be concluded within that period. Any delay will be explained to the student, and the student's right to request a Stage 3 review will not be made conditional on the completion of unrelated or outstanding remedial actions.

5.2.9. **Pausing the Investigation**

5.2.9.1. In some circumstances, the School may need to temporarily pause a complaints investigation. The Complaints Officer will inform affected students of the reason for the pause and, where possible, when the investigation is expected to resume.

5.2.9.2. An investigation may be paused where, for example:

- The matter is being investigated by the police or another external authority.
- The matter involves or may be subject to legal proceedings.
- Student or staff disciplinary procedures need to be initiated or concluded.

5.2.10. **The Investigation Meeting**

5.2.10.1. The purpose of holding a meeting is to allow all parties to express their perspectives and clarify the key issues the complainant wishes to address. Both the complainant and respondent are encouraged to present their cases in person. At the meeting the complainant/respondent will be provided the opportunity to outline and further detail the main issues stated in the complaint and provide additional evidence or information relevant to the case. It should be noted that if either the complainant or respondent

decides not to attend the meeting, it will not affect the fairness of the investigation; however, the outcome will be based solely on the evidence available.

5.2.10.2. The investigating officer may also have questions prepared they wish to address. This meeting will be conducted formally and comprise of the complainant/respondent, investigating officer, note-taker (if not the investigating officer), and a friend, colleague or Student Union representative that the complainant/respondent may choose to accompany them. The meeting minutes will summarise the key points discussed, not a verbatim account of the meeting, and will be shared with the meeting attendees to ensure there are no discrepancies in understanding between parties.

5.2.10.3. No legal representation can be present at this stage for either party.

5.2.10.4. Recording of in-person meetings are only allowed where all attendees have given consent. Virtual/online meetings will be recorded automatically, and all attendees must be notified of this at the point of invitation. All attendees should be permitted the opportunity to request and review any notes or recordings made during this meeting. All recordings will be stored in accordance with the Schools Student Data Protection Policy and, where applicable, the Schools Employee Data Protection and Records Management Policy.

5.2.11. **The Investigation Report**

5.2.11.1. The official investigation reporting documents will be issued to the investigatory officer upon appointment of the role. The reporting documents must be filled out comprehensively and clearly by the investigatory officer and provided to the registry department on completion of the investigation. The Registry department will be responsible for issuing the complainant with these reports and the accompanying outcome letter.

5.2.11.2. An investigation into the issues mentioned in the complaint will be carried out by the investigating officer, who will produce a comprehensive written report on the findings. This report will be given a general timescale of 25 working days for completion; however, this may not be possible to achieve due to availability of resources or staff and/or the nature of the complaint. In this case, additional time may be granted to the investigating officer, and the complainant will be notified of this update.

5.2.11.3. The Investigating Officer will prepare a clear and reasoned report addressing each material issue raised in the formal complaint. The report will identify the issues investigated, summarise the relevant evidence and representations considered, explain the findings reached on each issue, and set out the reasons for those findings. Where appropriate, the report will identify any limitations in the evidence or aspects that could not be fully investigated.

5.2.11.4. Each issue will be recorded as upheld, partly upheld or not upheld, with reasons supporting the decision. Where the complaint is upheld or partly upheld, the report should identify appropriate remedies, corrective actions or recommendations, including the responsible person or department and a proposed completion date where practicable.

5.2.11.5. The report and accompanying outcome letter must provide sufficient information for the student to understand the decision and, where they remain dissatisfied, to explain the basis on which they may request a Stage 3 review from RUL. Relevant information and evidence will be provided subject to appropriate redaction and confidentiality requirements. The report should not disclose confidential employment or disciplinary information beyond what can appropriately be shared with the student.

5.2.11.6. Complainants will be asked to assess the factual accuracy of the investigation before its completion.

5.2.12. **The Conclusion of the Investigation**

5.2.12.1. Upon conclusion of the investigation, the investigation officer will submit the full report, supporting documentation/evidence and meeting minutes to the LSST Registry department. The outcome will be stated in the report, which will provide clear and detailed reasons for the decision made. The investigation report will address each concern raised by the complainant and address them individually, providing a detailed response to each within the report and linking to any evidence considered. The report must confirm whether the complaint is Upheld (fully or partially), or is Not Upheld, with detailed reasons supporting this decision.

5.2.12.2. Where appropriate, the report should also include details of remedial actions to be taken/offered and recommendations to improve current practice or regulations highlighted by the findings of the investigation.

5.2.12.3. The remedy will be proportionate to the circumstances and will take account of the impact of the matter on the student. The remedies will be communicated in the outcome letter.

5.2.12.4. Where a remedy requires action by another organisation, including Ravensbourne University London, LSST will liaise with the relevant organisation to determine how the remedy can appropriately be implemented.

5.2.12.5. Once the investigation has concluded, and within 25 working days of the meeting, the investigating officer will write to the complainant to provide a detailed explanation of the investigation and the outcome of the complaint. They will also provide the complainant with full and explicit reasons for the outcome. The investigating officer may determine whether it is appropriate to communicate the outcome initially through a meeting, which is subsequently followed up in writing.

5.2.13. **The Final Review and Approval of the Investigation Report**

5.2.13.1. The completed investigation report, along with all accompanying documentation must be provided to the Registry Department for the Registrar/Complaint Manager's final review and approval.

5.2.13.2. If the investigation report concludes that there has been inappropriate conduct by a member of staff, the complainant will be informed that the matter will be referred to the LSST Human Resources Department for further investigation.

5.2.13.3. The Registry department will be responsible for issuing the formal response to the complainant. The Registry will issue the complaint outcome, investigation report and outcome letter to the complainant by email and post, where a postal address is available. This formal response will be issued to the complainant within 5-working days of receipt of Registrar/Complaint Manager confirmation of the decision and outcome. In this response, where appropriate, details of the actions or recommendations for resolution will be outlined. If there are follow-up actions required to close the case, the Registry will be responsible for issuing a deadline for the completion of any actions and track the progress of action completion.

5.3. Stage 3: Review of Formal Complaints Outcomes

5.3.1. **Requesting a Review**

5.3.1.1. Following completion of the formal complaints procedure at Stage 2, a complainant who remains dissatisfied with the outcome may request a Stage 3 review. The institution responsible for conducting the review will depend on the nature of the complaint and the applicable arrangements agreed between LSST and Ravensbourne University London (RUL).

5.3.1.2. For students registered on a RUL course delivered by LSST, Stage 3 reviews may be conducted either by LSST under its own review procedure or by RUL under its Student Complaints Procedure. The appropriate route will be determined by reference to the nature of the complaint and the applicable arrangements between LSST and RUL.

5.3.1.3. Where the complaint is to be reviewed by LSST, the complainant must submit a written request for a Stage 3 review to the LSST Registry Department within 10 working days of receiving notification of the Stage 2 outcome. The request must clearly explain the grounds for seeking a review and include the relevant supporting information. LSST will acknowledge the request and explain the next steps.

5.3.1.4. Where the complaint is to be reviewed by RUL, the complainant must follow RUL's Student Complaints Procedure and submit the completed.

5.3.1.5. RUL Student Complaint Form or contact complaints@rave.ac.uk within 10 working days of receiving notification of the Stage 2 outcome, subject to the requirements of the current RUL procedure. Students should refer to the RUL General Academic Regulations for 2026-27 for the applicable guidance. The complainant should provide the original complaint, LSST's Stage 2 outcome letter and investigation report, and relevant supporting evidence in accordance with RUL's requirements.

5.3.1.6. LSST will inform the complainant of the applicable review route and provide guidance on how to submit a request. Where RUL is conducting the review, LSST will provide relevant complaint records and supporting documentation and engage with the review process as required.

5.3.2. **Grounds for Review**

5.3.2.1. Where a Stage 3 review is conducted by LSST, the complainant must demonstrate one or more of the following grounds:

- The procedures followed during the formal stage were not followed properly.
- The outcome was unreasonable in the circumstances of the complaint.
- New evidence has become available which, for valid reasons, could not have been provided or considered earlier and which could have a significant or material effect on the decision.

5.3.2.2. The complainant must clearly identify the grounds on which the review is requested and provide supporting information where appropriate. Dissatisfaction with the outcome alone will not ordinarily be sufficient grounds for a review.

5.3.2.3. A Stage 3 review will not normally involve a complete reinvestigation of the complaint or consider entirely new issues that were not part of the original complaint. The review will focus on the grounds raised and the scope of the applicable procedure.

5.3.2.4. Where a Stage 3 review is conducted by RUL, the complainant should refer to RUL's Student Complaints Procedure for details of the applicable grounds for review and the requirements for submitting a request.

5.3.3. **Stage 3 Reviews Conducted by RUL**

5.3.3.1. Where RUL is responsible for conducting the Stage 3 review, it will consider the request in accordance with its Student Complaints Procedure and communicate the outcome to the complainant in accordance with its applicable timescales and requirements.

5.3.3.2. RUL's review is not normally a fresh investigation of the complaint. Where RUL identifies concerns with the Stage 2 process or outcome, it may take the action available under its procedure, including referring the matter back to LSST for reconsideration or recommending amendments to the findings, outcome or remedy where appropriate.

5.3.3.3. Where RUL requests further information or action from LSST, the School will consider and respond to the request within a reasonable timeframe, taking into account the nature and complexity of the matter, the information or resources required, and any other relevant circumstances. Where LSST is unable to meet a requested timeframe, it will inform RUL of the reasons and, where appropriate, agree a revised timeframe. LSST will communicate relevant next steps and anticipated timescales to the complainant, as appropriate.

5.3.3.4. Where the complaint review has been conducted by RUL, and if a Completion of Procedures Letter has not been provided, the student may request one from complaints@rave.ac.uk.

5.3.4. **Stage 3 Reviews Conducted by LSST**

5.3.4.1. Where the nature of the complaint means that Stage 3 is to be conducted by LSST under its own procedure, the LSST Registry Department will appoint an appropriately independent review officer who has not previously been involved in the complaint, its investigation or the original decision.

5.3.4.2. The review officer will consider the Stage 2 outcome, investigation report, relevant supporting evidence and the grounds raised by the complainant. The review will assess whether the procedure was followed properly, whether the outcome was reasonable in the circumstances, and whether relevant new evidence could materially affect the decision.

5.3.4.3. The review officer will prepare a written report setting out the review findings, reasons and any recommendations or proposed actions. The report will normally be completed within 10 working days of acceptance of the review request, where practicable. Where a delay is unavoidable, the complainant will be informed of the reason and the revised expected completion date.

5.3.4.4. Where required under the applicable LSST procedure or agreed arrangements with RUL, a Complaints Panel may be convened to consider the review findings. Panel membership will ensure that individuals involved in the original decision do not influence the review outcome.

5.3.4.5. The review may be upheld, partly upheld or not upheld, as appropriate. Where a material procedural failure or other issue requiring further consideration is identified, the case may be referred back for reconsideration by an appropriately independent decision-maker. The complainant will be notified in writing of the review decision, the reasons for it, any remedial actions and the expected timeframe for completion.

5.3.4.6. Where RUL has expressly referred a matter back to LSST following its own Stage 3 review, LSST will undertake the further consideration or reconsideration required by RUL. The nature and extent of that work, including whether a further LSST review or Complaints Panel is required, will be determined by the terms of the referral and the applicable arrangements between LSST and RUL.

5.3.5. **Completion of Procedures Letters and Further Recourse**

5.3.5.1. Where RUL conducts the Stage 3 review, RUL will be responsible for issuing any Completion of Procedures (CoP) letter in accordance with its Student Complaints Procedure and applicable Office of the Independent Adjudicator (OIA) guidance.

5.3.5.2. Where LSST conducts the Stage 3 review under its own procedure, LSST will issue a CoP letter where authorised and required under the applicable arrangements agreed with RUL, and in accordance with relevant OIA guidance on issuing Completion of Procedures letters.

5.3.5.3. Where RUL refers a matter back to LSST following its Stage 3 review, responsibility for issuing a CoP letter will be determined in accordance with RUL's referral instructions and the arrangements agreed between RUL and LSST. LSST will not assume responsibility for issuing a CoP unless authorised or required to do so under those arrangements.

5.3.5.4. The CoP letter will explain the final decision and the reasons for it, and provide information about the complainant's right to refer the complaint to the Office of the

Independent Adjudicator for Higher Education (OIA), where applicable. It will include the relevant deadline and signposting to further guidance.

5.3.5.5. The institution responsible for issuing the CoP letter must ensure that it is issued in accordance with the applicable procedure and that the complainant is informed of the correct timescales for any further action.

6. REFERRALS TO THE OFFICE OF THE INDEPENDENT ADJUDICATOR (OIA)

6.1. The School subscribes to the scheme for the independent review of complaints and appeals by the Office of the Independent Adjudicator (OIA). Students who believe their complaint has not been properly or fairly handled by the School or the awarding body can request for an independent review to be conducted by the OIA; where such requests are eligible for review, the OIA will investigate in accordance with its rules.

6.2. Referral to the OIA must be made within 12 months of the date of the Completion of Procedures Letter, and should be submitted using the OIA's complaints form, which can be found online here: https://www.oiahe.org.uk/media/0lal1ybo/oia-complaint-form-pdf.pdf

6.3. Further information on the OIA' procedures and eligibility for review of a complaint can be found on the OIA's website, www.oiahe.org.uk, or alternatively, students can contact the OIA directly on:

- Tel: 0118 959 9813
- Email: enquiries@oiahe.org.uk
- Office of the Independent Adjudicator
  OIA, PO Box 3362, Reading, RG1 9UF

7. COMPLAINANTS' CONDUCT

7.1. Whilst it is understood that a complainant may be experiencing anxiety as the result of the circumstances surrounding their complaint, they are expected nonetheless to conduct themselves in a reasonable manner and in accordance with the School's *Student Code of Conduct*.

7.2. Students are expected to refrain from making complaints which are of a frivolous, vexatious, petty, or harassing nature, or make unreasonable demands of the persons dealing with their complaint. Examples of unreasonable demands on the part of the complainant may include requesting responses within an unreasonable timeframe; insisting on seeing or speaking to a specific member of staff; continual phone calls, emails or letters; repeatedly changing the substance of the complaint or raising unrelated concerns.

7.3. Where the complainant is considered to be acting unreasonably, they will be told why this is unacceptable and given the opportunity to modify their behaviour. If the unreasonable behaviour continues, the School will take the appropriate measures, including referring students to the disciplinary procedures and terminating consideration of the complaint.

8. FORMAL INVESTIGATIONS

8.1. During Stages 2 and 3 of the complaint's procedures, the School may open a formal investigation into the issue.

8.2. The member of staff handling the investigation of a complaint may request the complainant to attend an interview as part of the investigative procedure. The member of staff will agree to a date, time and location with the complainant and confirm this in writing. The complainant has the right to be accompanied by a friend or student representative as an observer.

8.3. Any person about whom a complaint is made (the 'respondent') shall be provided with a copy of the complaint with sufficient time for them to prepare their representations ahead of any formal meeting concerning the complaint; the respondent shall have the same right of representation as the complainant.

8.4. Where either the complainant or respondent are accompanied in a formal meeting, details of their companion must be provided to the investigating officer in advance of the meeting; the School does not permit representation by an external organisation or professional legal representation during such investigations.

9. COMPLAINTS ABOUT STAFF MEMBERS OR OTHER STUDENTS

9.1. Should a student raise a complaint which appears to show that staff or students have acted in breach of School regulations, the matter will be investigated through the appropriate investigatory procedure, which may be the School's:

- Student or Staff Disciplinary Procedures
- Assessments Regulations and Procedures
- Academic Misconduct Regulations

9.2. This includes, but is not limited to, abusive or threatening behaviour, victimisation, bullying or harassing behaviour, actions likely to cause injury or threaten safety and unauthorised disclosure of confidential information.

Note: *Where the issue is referred to be dealt with under a different School policy, then the 90-day timeframe given for resolving complaints may no longer apply.*

9.3. If a complaint results in a hearing under another procedure or policy, the complainant may be asked to give evidence at a hearing. In instances where the complainant is not willing to give evidence, the School may not be able to proceed with the case.

9.4. Where the complaint results in a hearing under another procedure or policy, the School will comply with the provisions of the *Data Protection Act*. This means that the School may not be able to disclose full details of this procedure and any outcomes to the complainant. Legally, there is a recognised expectation that internal disciplinary matters of an individual will be private. If the School is unable to disclose the details of the outcome to the student, the student will be informed of the reasons for any such non-disclosure.

10. RECORD KEEPING AND CONFIDENTIALITY

10.1. A record of complaints received from students and the means of resolution will be kept by the Registrar and reported to the Academic Board as part of the School's monitoring and quality assurance processes.

10.2. School staff dealing with complaints matters may at times be in receipt of potentially sensitive information regarding students' personal circumstances; all such information disclosed by the student when making a complaint will be held securely within the Registry Office and shared only with those who need to be aware of it in order to carry out these procedures.

10.3. It is expected that those in receipt of concerns and complaints will respect confidentiality and retain anonymity for students raising concerns where this is appropriate. However, complainants should never be promised confidentiality as there may be instances where information disclosed must be passed on to fulfil a public function (such as reporting a crime).

10.4. Anyone dealing with a concern or complaint who is unsure whether information is confidential should clarify with the source of the information and speak to the School's Data Protection Officer: it@lsst.ac

11. TRAINING AND AWARENESS OF THE COMPLAINTS POLICY AND PROCEDURES

11.1. The School will periodically organise activities to raise awareness of the Complaints Procedure, and how it is to be used; students will have access to information about this policy and the correct process of making a complaint in their Student Handbooks and during Induction.

11.2. The School will additionally provide ongoing support and guidance for LSST Staff in handling complaints on how to best resolve them informally and how to respond to formal complaints.

12. REVIEW AND UPDATE

12.1. This policy and procedure will be reviewed and updated annually by the Head of Registry and the School's Quality Office; changes to it will be reviewed by the Executive Committee and ratified by the School's Board of Governors.

APPENDIX

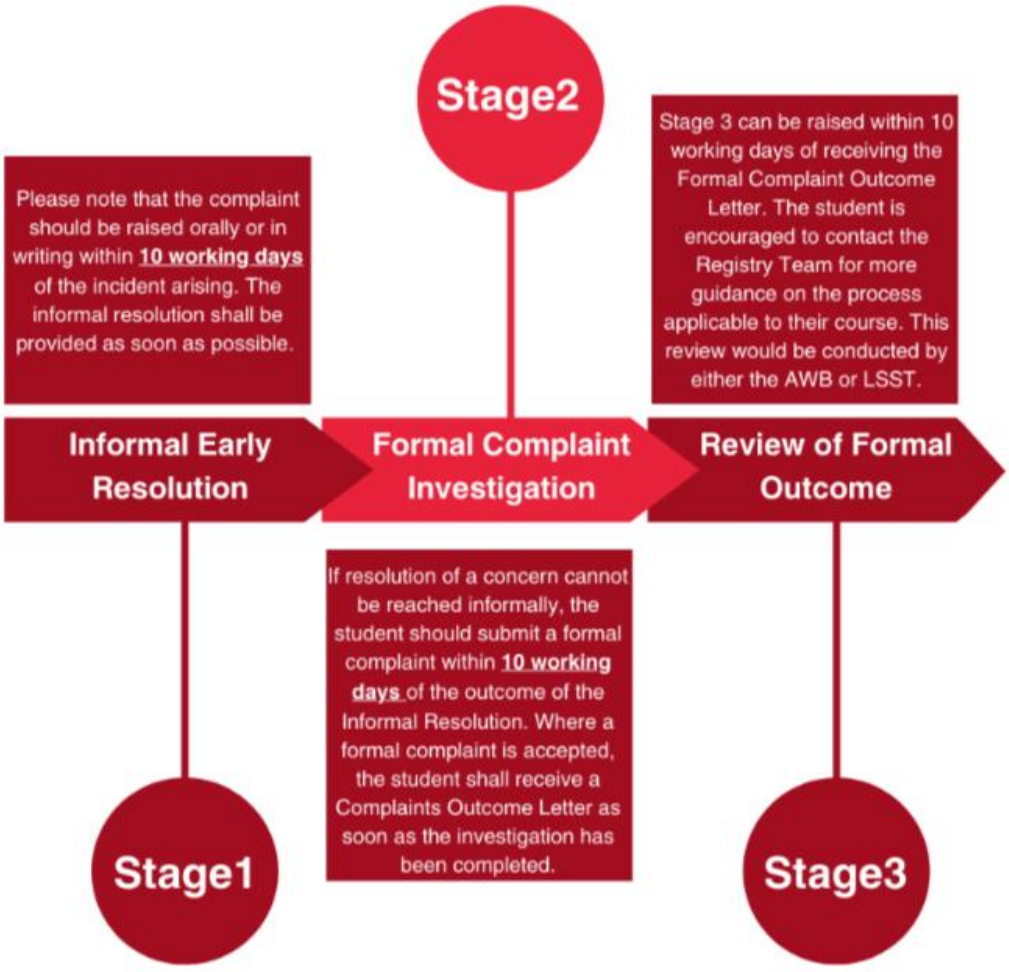


Figure 1. LSST Complaint Stages, Flow Chart (AY 2026/27).

VERSION HISTORY

Version	**1**	
Original author(s):	Head of Registry	
Reviewed by:	Assistant Registrar	September 2024
Version	**1**	
Revised by:	Quality Unit	
Revision summary:	Minor grammatical corrections, document format applied, version control applied.	
Approved by:	Approved by the Board of Governors	January 2025
Version	**2.0**	
Original author(s): **Revised by:**	Head of Registry Quality Unit	
Revision summary:	***Annual review and update –*** Minor grammatical corrections, document format applied, version control applied.	
Reviewed by: **Approved by:**	Publications Committee Board of Governors	September 2025 October 2025
Version	**2.0**	
Original author(s): **Revised by:**	Head of Registry Quality Unit	
Revision summary:	*Paragraph 6.7.12 updated to reflect current processes* and align with OIA.	
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Version	**3.0**	
Original author(s): **Revised by:**	Head of Registry Assistant Registrar Quality Unit	
Revision summary:	*Annual review and update -* *Policy rewritten to align with partner university processes. Investigation procedure rewritten with detailed steps, to further align the complaints framework with good practice expectations of the Office of the Independent Adjudicator (OIA) and awarding-body partnership requirements. Minor grammatical corrections, document format applied, version control applied.*	
Reviewed by: **Approved by:**	Publications Committee Board of Governors	October 2026 October 2026