



Compliments and Complaints Policy

Policy Details	
Policy Owner	Vice Principal Quality and Learner Journey
Approved by	Policies and Procedures Committee
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1. Statement of Intent

USP College welcomes feedback and will use complaints and compliments to improve learners' experience, services and organisational practice. Complaints will be handled lawfully, fairly, proportionately and as promptly as the circumstances allow.

- 1.1** No person will be disadvantaged, victimised or treated less favourably because they raise a complaint in good faith, support another person to complain, or act as a witness.
- 1.2** The College will make reasonable adjustments so that disabled people are not placed at a substantial disadvantage in accessing or participating in the process.
- 1.3** Decisions will be transparent. Formal outcomes will identify the decision-maker and explain the evidence considered, findings, reasons and any remedy for each complaint point.
- 1.4** Information will be shared only with people who need it to consider the complaint, protect individuals, meet legal duties or implement agreed action.

2. Introduction and Purpose

This policy applies to complaints and compliments about USP College services, provision, facilities, decisions, actions or omissions made by:

- 2.1** current or former learners, apprentices and Higher Education students;
- 2.2** parents, carers or authorised representatives;
- 2.3** employers, visitors, contractors, partner organisations and members of the public; and
- 2.4** groups of complainants, using a named lead contact and appropriate permissions.
- 2.5** Staff concerns about their own employment are handled under the Staff Grievance, Whistleblowing or other relevant employment procedure, not this policy.
- 2.6** A complaint is an expression of dissatisfaction about the standard of service, conduct, action, omission or decision of the College where a response or remedy is sought. A concern is a matter that may be capable of prompt local resolution. A compliment recognises good practice or a positive experience.
- 2.7** This policy does not replace another appeal, review, investigation or statutory process where a specific route applies. It will not normally be used to reconsider:
 - academic judgement, assessment decisions, examination results or examination decisions where an academic or examination appeal route is available;
 - admissions, bursary, financial-support, fee or refund decisions where a separate review or appeal procedure applies;
 - student disciplinary outcomes where the Student Disciplinary Procedure provides a right of appeal;
 - concerns raised by employees about their own employment, which are considered under the Staff Grievance, Bullying and Harassment, Whistleblowing or other relevant employment procedure;

- subject access requests, Freedom of Information requests or other information-rights matters, which are managed through the College's Data Protection and Information Rights procedures;
- protected disclosures or public-interest concerns that fall within the Whistleblowing Policy; or
- immediate safeguarding, Prevent, health and safety or suspected criminal matters, which must be addressed promptly under the relevant safeguarding, risk-management or statutory procedure.

A matter will not be excluded simply because it is connected to one of the areas above. A complaint about service standards, communication, unreasonable delay, reasonable adjustments, failure to follow a published procedure or the way in which the College handled a matter may still be considered under this policy where there is no more appropriate review or appeal route.

2.8 Following an initial assessment, the College may refer all or part of a submission to another procedure.

The complainant will be told:

- which complaint points have been referred;
- why another procedure applies;
- who will manage the matter or how to access the relevant procedure;
- whether a separate deadline applies; and
- whether any remaining complaint points will continue under this policy.

Where reasonably possible, the College will take account of the date on which the matter was first submitted when considering deadlines under the alternative procedure. Any immediate safeguarding, welfare, health and safety or criminal risk will be acted upon without waiting for the complaints process to conclude.

The use of another procedure does not prevent the College from recording relevant service failures, identifying learning or considering whether reasonable adjustments are required.

2.9 A formal complaint should normally be submitted within 6 calendar months of the event, or the most recent event in a connected series. The College may accept a late complaint where there is a good reason, including disability-related barriers, serious illness, bereavement, safeguarding concerns, delayed awareness of the issue or another exceptional circumstance, and where a fair investigation remains reasonably possible. Reasons for accepting or refusing a late complaint will be recorded and explained.

3 Related Policies and Procedures

- a. Safeguarding and PREVENT Policy
- b. Health and Safety Policy
- c. Student Disciplinary Policy
- d. Academic Appeals
- e. Exams Appeals
- f. Admissions
- g. Bursary
- h. Fees and Refund Policy
- i. Staff Grievance Policy
- j. Staff Prevention of Bullying and Harassment
- k. Staff Disciplinary Policy
- l. Whistleblowing Policy
- m. Equality Act 2010, including the Public Sector Equality Duty and duty to make reasonable adjustments
- n. UK General Data Protection Regulation (GDPR)
- o. Data Protection Act 2018
- p. Freedom of Information Act 2000

- q. Department for Education guidance on complaints about post-16 education and training provision funded by DfE
- r. Office of the Independent Adjudicator Good Practice Framework, including supporting disabled students.

4 Procedures

4.1 How to submit a Compliment or Complaint

The College uses one Compliments and Complaints Microsoft Form, published on the College website and MyUSP. - [USP College Compliments and Complaints – Fill in form](#)
Branching questions allow the person to select:

- a. a compliment
- b. a new Stage 1 formal complaint
- c. a Stage 2 review request
- d. help to make a submission or request a reasonable adjustment

4.2 Accessibility and reasonable adjustments

The Microsoft Form is the single case-capture route, not a requirement that every person completes a digital form without support. The College will anticipate common access barriers and consider individual requests promptly. A person will not be required to disclose more medical information than is necessary to understand the adjustment requested. Where disability or need is already known, the College will not routinely ask for fresh evidence.

Reasonable adjustments may include, but are not limited to:

- a. Visual impairment or print disability: screen-reader compatible electronic information, large print, high-contrast text, audio, assistance navigating the form, and documents that do not rely on images alone.
- b. Hearing impairment: British Sign Language interpretation where reasonable, captioned online meetings, hearing-loop access, written questions and written outcomes.
- c. Autism, ADHD, learning disability or specific learning difficulty: plain English or Easy Read, one question at a time, a named contact, advance notice of meeting topics, additional processing time, reduced sensory demands and a low-arousal approach.
- d. Mental-health condition, anxiety or trauma-related need: predictable contact, communication in writing, shorter meetings, breaks, a supporter or representative, flexible deadlines and avoiding unnecessary repetition of distressing information.
- e. Physical disability, fatigue, chronic pain or mobility need: remote or accessible meetings, rest breaks, shorter sessions, accessible venues, alternative appointment times and flexibility around deadlines.
- f. Speech, language or communication need; written, audio or augmentative communication, extra response time, an advocate or supporter, and no adverse inference from communication style.

- g. Language or digital exclusion: plain-language explanation, interpreter or translation support where reasonable, access to a device, telephone or in-person support, and staff-assisted form completion.
- h. Adjustments may also apply to meetings, evidence deadlines, the format of questions, who attends, how decisions are communicated and whether a representative may speak on the complainant's behalf. Any agreed adjustment, and the reason for any request that cannot be met, will be recorded on the case file.
- i. The acknowledgement will explain how supporting evidence can be provided securely using the complaint reference.

4.3 Requesting help to make a submission

A request for help does not need to be made through the Microsoft Form. If a person cannot access or complete the Form independently because of a disability, health condition, communication or language need, digital exclusion or another barrier, they can request assistance by:

- emailing feedbackmatters@uspcollege.ac.uk
- speaking to Reception at any College campus during published opening hours

The College will discuss the person's needs and provide reasonable assistance or adjustments. With the person's agreement, an authorised member of staff may enter the complaint into the same Microsoft Form on their behalf. The wording will be read back or provided to the complainant for confirmation where practicable.

Once entered, the complaint will be logged, allocated a case reference and managed through the same stages and timescales as any other complaint. Where arranging assistance causes a delay, the date on which the person first contacted the College about the complaint will be retained when determining whether it was submitted within the policy deadline.

A person will not be disadvantaged for requesting assistance and will only be asked to provide information that is reasonably necessary to understand and provide the support or adjustment requested.

4.4 Timescales

A working day is Monday to Friday, excluding bank holidays and published College closure days. College holidays do not automatically stop the clock. Where the College cannot meet a target because the matter is complex, key people are unavailable, an external process is relevant or another good reason applies, the Complaints Co-ordinator will explain the reason before the deadline, give a revised date and provide an update at least every 10 working days.

4.5 Early resolution

Straightforward concerns should, where suitable, be raised promptly with the member of staff responsible or their manager. The aim is to understand the issue, explain what happened, correct an error and agree practical action within 5 working days. A brief note of the concern and outcome should be retained locally where proportionate.

Early resolution will not be required where the concern involves serious, alleged misconduct, safeguarding, discrimination, significant service failure, multiple incidents, a person who does not feel safe approaching the area, or any other circumstance making local resolution unsuitable. A person may submit a Stage 1 complaint at any time within the policy deadline.

4.6 Submissions received by email, letter, telephone or in person

Formal complaints are logged through the Microsoft Form. If a complaint is first raised by email, letter, telephone or in person, the College will provide access to the Form and offer assistance to complete it. Where required, an authorised member of staff will capture the complaint in the Form on the complainant's behalf. The original date of contact will be retained when considering whether the complaint was submitted within the policy deadline.

4.6 Urgent exception

Any information indicating immediate risk of harm, a safeguarding concern, serious health and safety risk or suspected criminal behaviour must be acted on immediately, whether or not a form has yet been completed.

5. Stage 1 - formal complaint and investigation

5.1 Receipt, acknowledgement and triage

- i. The Microsoft Form submission is checked promptly for immediate safeguarding, welfare, health and safety, criminal, legal, regulatory or business-continuity risk.
- ii. Within 3 working days the Complaints Co-ordinator sends a named acknowledgement confirming the case reference, stage, contact person, expected response date, adjustment arrangements and any essential information required.
- iii. Within 5 working days the complaint is assigned to an investigator and decision-maker who are suitably independent and have declared any conflict of interest.
- iv. For a complex complaint, the Co-ordinator or investigator sends a numbered scope summary. The complainant has 3 working days to identify a factual misunderstanding. This is not an opportunity to add unrelated complaints.

5.2 Scope, new issues and evidence

The investigation will address the numbered complaint points confirmed at the start. Closely linked evidence may be provided by the deadline set by the investigator. A materially different or later issue will normally require a new Microsoft Form submission and a new reference; linked cases may be investigated together where this is fair and efficient.

The investigator will explain at an early stage if the outcome sought is outside the College's power, unlawful, disproportionate or better considered through another procedure. The College may still consider whether another suitable remedy is available.

5.3 How the complaint will be investigated

The investigation will be proportionate to the seriousness and complexity of the complaint. It may include:

- i. reviewing the form, attachments and relevant College records, including records identified by the complainant;
- ii. meeting or obtaining a statement from the complainant, staff and relevant witnesses;
- iii. putting significant adverse information to the person affected and allowing a fair opportunity to respond;

- iv. checking applicable policies, agreed support plans, contracts, funding or awarding-organisation requirements;
- v. considering whether mediation or another agreed resolution may help; and
- vi. producing a clear investigation record showing the scope, evidence, analysis, findings and recommendations;
- vii. Findings will be made on the balance of probabilities: whether it is more likely than not that the matter occurred as alleged. The complaints process does not determine criminal liability or replace disciplinary, safeguarding or legal proceedings.

5.4 Meetings and records

A meeting is not required in every case. Where one is held, the College will confirm its purpose, attendees, likely topics, format and any adjustments in advance. The complainant may be accompanied. A written note will record who attended, the main points and decisions. Audio or video recording requires prior agreement; a recording may be agreed as a reasonable adjustment. Unauthorised covert recording may be addressed under the relevant conduct procedure but will not automatically invalidate the substance of a complaint.

5.5 Stage 1 outcome

The Stage 1 outcome will normally be issued within 20 working days of acknowledgement. The outcome will provide a separate finding for every numbered complaint point. Each point will be recorded as upheld, partially upheld, not upheld, unable to determine, or outside scope/referred to another procedure.

The outcome will set out the evidence considered, key facts, reasons, remedy or action, owner and timescale. It will identify the named investigator and decision-maker and explain how to request Stage 2 review. Correspondence must not be unsigned.

6. Stage 2 - independent review

6.1 Starting Stage 2

A complainant may request Stage 2 within 10 working days of the Stage 1 outcome by using the same Microsoft Form, selecting "Stage 2 review" and quoting the reference. A late request may be accepted for a good reason, including where a reasonable adjustment is required.

The request must identify one or more permitted grounds:

- i. a material part of the published procedure was not followed, and this may have affected the outcome;
- ii. the finding or remedy was not reasonably supported by the evidence available at Stage 1
- iii. there is relevant new evidence that could materially affect the outcome and could not reasonably have been provided at Stage 1
- iv. a conflict of interest or reasonable perception of bias was not properly managed

6.2 Scope and process

Stage 2 is a review, not a fresh investigation and not an opportunity to introduce unrelated complaint points. Within 3 working days, the College will acknowledge the request, confirm whether the grounds are met, name the reviewer and provide the target date. A reviewer who has had no previous involvement will consider the Stage 1 file, the stated review grounds and any permitted new evidence. The reviewer may seek limited clarification where necessary.

6.3 Stage 2 powers and final response

The reviewer may:

- i. confirm the Stage 1 outcome
- ii. vary or overturn one or more findings or remedies
- iii. require a defined part of the complaint to be reconsidered by a different person
- iv. identify procedural learning or further action.

The final response will normally be issued within 15 working days of acknowledgement. It will be named and signed, explain the decision on each review ground, state whether the internal procedure is exhausted, and provide the applicable external route. For eligible Higher Education students it will include or accompany an OIA-compliant Completion of Procedures Letter.

6.4 Independence and complaints about senior post-holders

Where full separation is not practicable, the College will explain the arrangement and may appoint a colleague from another area, an uninvolved governor or an external investigator. Complaints about the Principal/CEO, Chair of Governors or another senior post-holder will be submitted through the same Microsoft Form and allocated through the College's governance arrangements to a person with no previous involvement.

7. Information, confidentiality and procedural fairness

- 7.1** The College will give the complainant enough information to understand how the decision was reached. This will normally include a summary of the material evidence and the investigation findings. Information may be withheld, anonymised or redacted where necessary to protect another person's data, safeguarding information, legal privilege, confidential employment matters, security or another lawful interest. Witness statements and internal records will not automatically be disclosed in full.

If information may materially influence an adverse finding, the investigator will consider how its substance can be put fairly to the affected person without unnecessary disclosure. Requests for personal data, College records or recorded information will be handled under the Data Protection and Information Rights procedures; a complaint does not create a separate right to unredacted documents.

Staff disciplinary, capability or safeguarding action may follow an upheld complaint, but the College will not normally disclose confidential details of action concerning another person. It may confirm that appropriate action has been taken where lawful and fair.

- 7.2** Complaint submissions, correspondence, evidence, investigation notes, meeting records, outcomes, review records and evidence that agreed actions have been completed will be held securely and retained for the period specified in the College's Records Retention Schedule and Data Protection Policy. Access will be limited to those who need it for their role. Records will be securely deleted or destroyed when the retention period ends. Retention may be extended where this is necessary for safeguarding, legal or regulatory action, litigation, an external review or another documented lawful reason; the reason and review date will be recorded.

8. Outcomes, remedies and action tracking

Where a complaint is upheld or partially upheld, the remedy will be proportionate and within the College's lawful authority. It may include:

- i. an explanation, correction or apology;
- ii. reconsideration of a decision by an appropriate person;
- iii. restoration of a missed service or opportunity where practicable;
- iv. review of support, communication, risk management or reasonable adjustments;
- v. staff guidance, training, supervision or policy/process change;
- vi. a fee, refund or financial remedy considered under the Fees and Refund Policy and delegated authority; and
- vii. monitoring to confirm the action has been completed and effective.

The Complaints Register will record each agreed action, responsible owner, due date and completion evidence. The complainant will be told when an action directly affecting them has been completed. A complaint outcome cannot guarantee progression, assessment results, staff deployment or another decision that must lawfully be made under a separate process.

9. Conduct and managing unreasonable behaviour

- 9.1** Everyone involved is expected to communicate honestly and respectfully, avoid knowingly false or misleading information, respond within reasonable deadlines and use the named Complaints Co-ordinator rather than repeatedly contacting multiple staff about the same case. Strongly expressed, persistent, unsuccessful or unsubstantiated complaints will not, by themselves, be treated as unreasonable, malicious or vexatious. A person will not be disadvantaged for raising a concern in good faith.
- 9.2** A complaint may be considered malicious only where reliable evidence shows that a person knowingly made a false allegation or fabricated or altered evidence with the intention of causing harm. Behaviour may be considered vexatious where its nature, frequency or scale is objectively unreasonable and materially obstructs the fair and efficient handling of the matter. Examples include repeatedly pursuing a concluded complaint without relevant new information, abusive, threatening or discriminatory communication, or excessive and unreasonable demands or contact. The assessment will focus on the evidence and behaviour, not simply the label used or the outcome of the complaint.
- 9.3** Where evidence establishes a knowingly false allegation or fabricated evidence, the College may refer the matter under the relevant student, staff or other conduct procedure. No referral or sanction will be made merely because a complaint is not upheld or the evidence is insufficient to determine it. Any new safeguarding, safety or other serious risk information will always be assessed on its merits.
- 9.4** Before restricting contact, the College will consider the person's needs and reasonable adjustments, allow them to respond and consider less restrictive options. Any restriction must be proportionate, approved by the Vice Principal Quality and Student Journey or an uninvolved senior leader, explained in writing, time-limited where possible and include a review route. It will not prevent fair consideration of the complaint or assessment of new safeguarding or other serious risk information.

10. Anonymous, group and third-party complaints

- 10.1** Anonymous complaints will be logged and risk-assessed. The College may investigate where there is sufficient information or a serious safeguarding, safety, fraud or public-interest concern, but may be unable to provide an outcome.
- 10.2** A group complaint should identify a lead contact and each individual represented. Before sharing personal information with the lead contact, the College will obtain and retain clear written authority from each person, normally through the Compliments and Complaints Microsoft Form or their verified College email account. The authority must name the lead contact, confirm that the person wishes to join the complaint, authorise the lead to submit and receive correspondence and the outcome on their behalf, and record any limits on information-sharing. The lead contact's statement alone is not sufficient and they may not give authority for another person without evidence of legal authority. Authority may be withdrawn at any time. Withdrawal applies to future sharing and does not affect information already lawfully processed or necessarily prevent consideration of the shared issues.
- 10.3** The Microsoft Form and any staff-assisted complaint template must include a separate, unticked authority declaration for each person represented, link to the relevant privacy notice and explain how authority can be withdrawn. Without verified authority, the College may record and risk-assess the concern but will not disclose that person's information to the lead contact, subject to safeguarding, capacity or other legal duties.
- 10.4** A parent, carer, employer or other representative may complain in their own right. Where they act for a learner, the College will normally verify the identities of the learner and representative and obtain and retain the learner's clear written authority before receiving or disclosing the learner's personal information. The authority must name the representative, specify what they may do and what information may be shared, and record any limits. Parent or carer status alone does not automatically provide authority to act for a learner. Capacity, parental responsibility, best interests, safeguarding and other legal considerations will be assessed case by case.

11. External escalation

The Stage 2 final response will identify the route that applies to the provision and complaint. External bodies have their own scope and deadlines.

- a. DfE-funded Further Education and apprenticeships: after the College's internal procedure is exhausted, eligible learners, apprentices, authorised representatives and employers may use the [Department for Education post-16 complaints procedure](#). DfE normally reviews whether the provider investigated fully and fairly and followed its procedure; it does not simply re-investigate the merits.
- b. Higher Education, including eligible degree apprenticeships: after internal procedures and issue of a Completion of Procedures Letter, an eligible student may complain to the [Office of the Independent Adjudicator for Higher Education](#), normally within 12 months of the date of that letter.
- c. Qualifications, examinations and awarding organisations: the relevant awarding organisation, examinations appeal route or Ofqual route applies, depending on the issue.
- d. Data protection and information rights: the Data Protection Officer will explain the right to complain to the Information Commissioner's Office after the College has considered the matter.
- e. Safeguarding or criminal matters: the College may need to refer to the local authority, police, DfE, Ofsted or another statutory body without waiting for the complaints process to finish.

12. Compliments

Compliments should be submitted through the same Microsoft Form by selecting “Compliment”. The complaints coordinator will log the compliment, share it with the relevant staff and manager, and use it to recognise and spread effective practice. Compliments may be reported in anonymised or aggregated form.

13. Monitoring, learning and governance

The Vice Principal Quality and Student Journey will monitor volume, source, site/service, stage, timeliness, outcomes, equality and accessibility themes, repeat issues, remedies and overdue actions. Serious risks or recurring failures will be escalated promptly to the relevant senior leader, DSL, Data Protection Officer, Health and Safety lead, HR or Governance Professional.

An annual anonymised report will be presented to the Quality Committee and Corporation. It will identify trends, performance against timescales, themes affecting protected or priority groups, lessons learned, completed improvements and any required policy, training or resource action. Individual case information will not be included unless necessary and lawful.

14. Representatives and supporters

A complainant may be supported or represented by a trusted adult, advocate, interpreter, Student Union adviser or other appropriate person. The College will normally require the student's informed permission before discussing their personal information with a parent, carer or other representative. Age, capacity, parental responsibility, best interests and safeguarding duties will be considered case by case. A representative may speak on the person's behalf where this is a reasonable adjustment or otherwise agreed.

Equality and Diversity Statement & Impact Assessment

USP College is committed to equality of opportunity. The aim is to create an environment in which people treat each other with mutual respect, regardless of: age, disability, family responsibility, marital status, race, colour, ethnicity, nationality, religion or belief, gender, gender identity, transgender, sexual orientation, trade union activity or unrelated criminal convictions.

USP College is committed to maintaining a safe, sustainable environment for all students, staff and visitors at all times.

This form should be used by managers and policy owners within their area of responsibility to carry out Equality and Diversity Impact Assessments (EDIAs) in relation to protected characteristics including, but not limited to: Age, Disability, Gender reassignment, Marriage and civil partnership, Pregnancy and maternity, Race, Religion and belief, Sex, Sexual orientation. The word 'policy' is taken to include strategies, policies, procedures and guidance notes; both formal and informal, internal and external.

1. Name of Policy

Compliments and Complaints Policy

2. Which of the following groups could be affected by this policy?

(Tick all that apply)

Students	✓
Staff	✓
Wider Community	✓

3. Complaints

Have complaints been received from anyone with one or more protected characteristic about the service provided? If yes then please give details.

No specific complaint data has been provided for this assessment that demonstrates direct discrimination by the procedure. Equality data is voluntary and may be incomplete, so the action plan requires annual analysis of access, timeliness, outcomes and appeals, with qualitative checks for disabled and neurodivergent people and those who need language or communication support.

4. The Impact

Four possible impacts should be considered as part of the assessment:

- Positive Impact** - Where the policy might have a positive impact on a particular protected characteristic.
- None or Little Impact** – Where you think a policy does not disadvantage any of the protected characteristics
- Some Impact** – Where a policy might disadvantage any of the protected characteristics groups to some extent. This disadvantage may be also differential in the sense that where the negative impact on one particular group of individuals with protected characteristic is likely to be greater than on another.
- Substantial Impact** – Where you think that the policy could have a negative impact on any or all of the protected characteristics. This disadvantage may be also differential in the sense that the negative impact on one particular protected characteristic is likely to be greater than on another.

Thought-provoking questions, which might help come to a decision about the impact of a policy on individuals with protected characteristics:

- e. Does policy outcomes and service take up differ between people with different protected characteristics?
- f. What key information do we have? Does data or engagement with people with protected characteristics give insights into areas of disadvantage, which relate to the policy area?
- g. If the policy is likely to have a negative impact on individuals, sharing particular characteristics what steps can be taken to mitigate these effects?
- h. Will the policy deliver practical benefits for certain groups?
- i. Does the policy miss opportunities to advance equality of opportunity and foster good understanding/relationships between groups?
- j. Do other policies need to change to make this policy more effective?
- k. Is there any elements of the policy that could be unlawful under the Equality Act 2010?

Use the guidance provided above and complete the following table: **(Please Tick ✓)**

Gender/Age	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Gender		✓		
Age		✓		
Disability	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Visually Impaired			✓	
Hearing impaired	✓			
Physical Disability	✓			
Specific Learning Difficulties			✓	
Global Learning Difficulties			✓	
Autistic Spectrum Disorder			✓	
Any other disability – Various			✓	
Other Factors	Positive Impact	No or Little Impact	Some Adverse Impact	Substantial Adverse Impact
Race			✓	
Culture			✓	
Religious Belief		✓		
Sexual Orientation		✓		
Gender Reassignment		✓		

Marriage/Civil Partnership		√		
Pregnancy /Maternity /Paternity		√		

Additional Considerations	Positive Impact	No or Little Impact	Some Adverse Impact (mitigation if applicable)	Substantial Adverse Impact (mitigation if applicable)
Trauma Informed*		√		
Safeguarding (incl. PREVENT) – have any risks to safety been identified / mitigated / eliminated?		√		
Health & Safety – have any risks been identified / mitigated / eliminated?		√		
Sustainability – are there any anticipated impacts?		√		

**Trauma results from an event, series of events, or set of circumstances that is experienced by an individual as harmful or life threatening. While unique to the individual, the experience of trauma can cause lasting adverse effects, limiting the ability to function and achieve mental, physical, social, emotional or spiritual well-being. Consideration of support and/or reasonable adjustment(s) needs to be given where the college is aware of such circumstance being applicable to any member of staff who may be affected by this policy. This is to avoid re-traumatisation which is the re-experiencing of thoughts, feelings or sensations experienced at the time of a traumatic event or circumstance in a person's past. Re-traumatisation is generally triggered by reminders of previous trauma which may or may not be potentially traumatic in themselves.*

Please comment on any areas where some or substantial impact is indicated. Any resulting actions must be added to the below action plan.

Potential indirect disadvantage remains where a person cannot easily use written or digital routes, understand the process, communicate in English, or tolerate an unfamiliar formal process. The policy's staff-support and reasonable-adjustment commitments reduce this risk, but effectiveness depends on accessible contact details, staff-assisted completion, alternative formats and monitoring. No substantial adverse impact has been identified.

Some Adverse Impact remains. Despite the mitigations within this policy, the complaints process continues to rely on individuals being able to communicate their concerns, understand and provide relevant evidence, and engage with procedural deadlines. These requirements may continue to create barriers for some disabled and neurodivergent people, people with mental-health or trauma-related needs, those with language or communication needs, people experiencing digital exclusion, and those with fluctuating health conditions. The policy reduces these risks through reasonable adjustments, accessible formats, staff-assisted completion, representation or support, and flexibility around communication and deadlines. However, the barriers cannot be removed entirely without compromising a fair, timely and evidence-based process. Effectiveness will therefore be monitored through equality and accessibility data, feedback, complaint outcomes and annual review. No Substantial Adverse Impact has been identified.

5. Is there anything that cannot be changed?

What cannot be changed?	Can this be justified?	If so, how?
Some matters must be handled under a separate statutory, safeguarding, employment, examination, disciplinary or information-rights procedure.	Yes	The College must follow the route with legal or regulatory authority. Complainants will be told which route applies and how to access it; disclosure will remain subject to data protection, safeguarding and confidentiality duties.

Please list the main actions that you plan to take as a result of this assessment in your area of responsibility.
(Continue on separate sheets as necessary)

Action Plan:

- Publish and test accessible submission routes, including a named contact for staff-assisted completion by email, telephone or in person, and ensure digital routes work with screen readers.
- Train complaint handlers on reasonable adjustments, accessible communication, unconscious bias, trauma-informed practice and referral of safeguarding or discrimination concerns.
- Record voluntary equality data separately and securely, and analyse access, timeliness, outcomes and appeals annually by protected characteristic where numbers permit.
- Monitor whether disabled, neurodivergent and people who need language support experience barriers; obtain qualitative feedback and make further adjustments where required.
- Audit a sample of complaints annually for consistent timescales, impartiality, reasonable adjustments and clear outcome letters.
- Report material equality themes and actions through SMT and the annual Quality Committee and Corporation reporting cycle; review this assessment annually.