



External Feedback Policy & Complaints Procedure

Policy Statement

The College strives to provide a positive experience for all, including those that visit us. To help the College to achieve this aim, feedback is welcomed and we are committed to learning from the feedback we receive, whether positive or negative. We take all feedback – including compliments, suggestions or complaints – seriously.

This policy sets out the key principles which underpin the ways in which feedback received from non-College members is considered by the College, and includes details of the procedures which will be followed where negative feedback, including complaints, is received. The College maintains separate policies and procedures for dealing with feedback, including complaints, received from College members.

Application & Scope

This policy and the procedure set out below relate to feedback provided by any individual that is not a current College member¹.

Feedback Principles

All non-College members are invited to provide feedback, whether positive or negative, by using one of the methods set out below. Feedback is welcomed on all areas of the experience an individual may have had with the College, and may be provided either by the individual, or by a friend, relative or representative on their behalf. All feedback received is subject to the confidentiality provisions set out below.

Methods of providing feedback include:-

- By post, to the College's postal address: St Edmund's College, Mount Pleasant, Cambridge, CB3 0BN
- By email
- For data protection complaints, by email to grcm@st-edmunds.cam.ac.uk

A complaint will be responded to in accordance with the Complaints Procedure set out below.

Complaints

A complaint is an expression of dissatisfaction with the College, or any part of your experience with the College, that you feel requires resolution.

¹ For these purposes, "current College member" means current students, staff, Fellows and senior members, but excludes alumni.

Complaints should be raised within three months of the incident or event to which the complaint relates (or, where the complaint relates to a series of incidents or events, within three months of the latest incident or event). We will consider complaints made outside of this time frame if exceptional circumstances apply; however, we reserve the right to refuse to investigate the complaint if it appears reasonable and fair to do so, having regard to the circumstances surrounding the complaint.

All complaints will be taken seriously and where applicable, investigated impartially.

Complaints may be raised using the Complaints Procedure set out below in relation to any of the following:-

- Where you are unhappy with the attitude or behaviour of any College member, including students, fellows, senior members and staff.
- Where you believe we have demonstrated poor service;
- Where you are unhappy or are concerned with how we have handled your personal information;
- Where you are dissatisfied with how we have delivered policies, or where you are unhappy with a policy.

Where any complaint involves any allegation of criminal activity or the possible commission of a criminal offence, it is likely that the College will suggest that you refer your complaint immediately to the relevant authorities.

The Complaints Procedure set out below should **not** be used in the following circumstances:-

- Any complaint by or on behalf of a current College member (please see separate policies and procedures).
- Any complaint which relates to the University of Cambridge or any individual University department, office or faculty, rather than to the College directly.
- Safeguarding concerns (these should immediately be referred to the Bursar, who is the College's Designated Safeguarding Lead, via bursar@st-edmunds.cam.ac.uk).
- A request for information or clarification of policy or procedures
- A professional disagreement by a partner organisation or supplier, including contractual disputes
- Legal action or compensation claims
- Appeals against admissions decisions
- Academic or examination appeals

Confidentiality

We will maintain the confidentiality of all personal information processed as part of any complaint and only disclose it to other relevant parties with your permission or if we are otherwise legally obliged to do so.

However, if we are informed of anything that makes us think that an individual is unsafe or at risk of being harmed, we will pass this on to the appropriate authority for action.

Having your personal details helps us work with you in the best way through our feedback processes. If you are raising an issue on behalf of someone else, we reserve the right to inform that person that you have contacted us. Further information about the way in which the College handles personal data can be found in the College's [data protection statements](#).

The College will **not** accept, investigate or act upon complaints made anonymously.



Complaints Procedure

If the College has determined that your feedback constitutes a complaint, we will confirm this to you in writing within 3 working days of receipt of your feedback.

A complaint received by any member of the College including the Master will be dealt with under this policy and procedure. The complaint will then be sent to the Governance Risk and Compliance Manager who will oversee the resolution of the complaint. The complaint will then be considered in accordance with the below four-stage procedure:-

Stage One – Informal Resolution

- We will always try and resolve the issue in the easiest, most direct way as informally as possible before entering the next stages of the formal procedure.
- We will review the information that you have provided and provide an informal response confirming whether we agree with all or part of your complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- We will explain why we don't agree, if this is the case.
- We will endeavour to respond to you within 10 working days. If this is not possible we will contact you and explain why.
- If you are not satisfied with the outcome of the complaint, you should raise this by contacting us again to explain why you are dissatisfied and to consider possible next steps and the next stage.

Stage Two – Formal Investigation

- The Stage Two Procedure will be adopted when:
 - You have communicated that you are unsatisfied with the resolution to any complaint considered under Stage One and we have decided that it is appropriate to escalate your complaint to the formal investigation stage.
 - We consider that the nature of your complaint requires immediate escalation to Stage Two.
- We expect that, where possible, all relevant information is provided to enable us to investigate the complaint or issue as fully as possible at the point of communicating the complaint, or in swift response to any request for information that we may make. The late provision of new information which you would like to be considered may impact our ability to respond within the timescale stated below.
- Where new information is introduced, we will determine whether this information represents a significant change to the scope of the original complaint, in which case we may consider that this constitutes a complaint requiring separate investigation.
- Complaints considered under Stage Two will be investigated by an appropriate and suitably independent member of management staff.

- The investigator appointed:
 - Will consider the information provided and obtain such further information as is needed to form a conclusion and provide a response to your complaint.
 - Can recommend actions needed to bring the complaint to a satisfactory conclusion, and make arrangements for these to be undertaken (where appropriate without meeting the parties directly involved).
- We will let you know if we agree with all or part of your complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- We will explain why we don't agree, if this is the case.
- We will endeavour to respond to you within 20 further working days if your complaint is received within Term. If this is not possible we will contact you and explain why. Complaints received towards the end of Term or outside Term may require longer response times.
- If you are not satisfied with the outcome of the complaint following formal investigation under Stage Two, you should raise this by contacting us again to explain why you are dissatisfied and to consider possible next steps and the next stage.

Stage Three – Senior College Officer Investigation

- The Stage Three Procedure will be adopted when:
 - You have communicated that you are unsatisfied with the resolution to any complaint considered under Stage Two and we have decided that it is appropriate to escalate your complaint to the Senior College Officer investigation stage.
- Complaints considered under Stage Three will be investigated by an appropriate and suitably independent Senior College Officer.
- The Senior College Officer appointed:
 - Will decide whether to review the complaint by examining all of the associated paperwork, including the initial investigation findings, or whether to arrange a meeting with the complainant.
 - Can recommend actions (including actions further or alternative to those recommended following the Stage Two investigation) needed to bring the complaint to a satisfactory conclusion, and make arrangements for these to be undertaken (where appropriate without meeting the parties directly involved).
- The investigating Senior College Officer will let you know if they agree with all or part of your complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- They will explain why they don't agree, if this is the case.
- They will endeavour to respond to you within 20 further working days. If this is not possible we will contact you and explain why.

- You have the right to appeal in certain circumstances if you are not satisfied with the outcome of the complaint following Senior College Officer investigation under Stage Three. The appeal process, including the grounds upon which appeals may be brought, is set out under Stage Four below.

Stage Four – Appeal to the Master

- If you are dissatisfied with the response to your Stage Three complaint, you have the right to appeal the decision. Your appeal must be made in writing within 10 working days of receipt of the Stage Three response and should detail the reason for your appeal, which must be on one or more of the grounds set out below. Appeals against the decision outcome at Stage Three should be submitted in writing and addressed to the Master via masters.office@st-edmunds.cam.ac.uk.
- Appeals may be submitted on any one or more of the following grounds:-
 - You believe that the College has not handled your complaint in accordance with the provisions of this Policy and Complaints Procedure
 - You have new material information or evidence which, for valid reasons which must be specified, you were unable to provide earlier in the process;
 - You believe that there was bias or a reasonable perception of bias during the investigation of your complaint at Stage Three.
- The Master will decide whether to review the complaint by examining the associated paperwork and evidence collected, or whether to arrange a meeting with the complainant. If appropriate, notification of an appeal meeting will be made in writing to the complainant giving adequate notice. Any meeting will also be attended by a College Officer who has not previously been involved in the complaint.
- The outcome of the appeal will be confirmed in writing to the complainant, normally within 20 working days, unless outside Term. The outcome of the appeal is final and an appeal decision represents the completion of the College's internal procedures.

Complainant Conduct

Whilst the College understands that those raising complaints may be unhappy, the College expects those raising complaints to act reasonably at all times. The College reserves the right to deviate from the Complaints Procedure in circumstances in which the complainant's conduct is considered by the College to be unreasonable. Examples of this include:-

- Where the Complainant's behaviour or language members of the College is abusive, offensive, discriminatory or threatening;
- Where the Complaint's behaviour is hindering our consideration of complaints and/or the proper running of the College because of the frequency or nature of the Complainant's contact, including excessive contact regarding the complaint while any investigation is in process;
- Where the Complainant refuses to articulate their complaint or specify the grounds of a complaint or the outcomes sought by raising the complaint, despite offers of assistance;

- Where the Complainant refuses to co-operate with the complaints investigation process or refuses to accept that certain issues are not within the scope of the complaints procedure;
- The Complainant insists on the complaint being dealt with in ways which are incompatible with the complaints procedure or with good practice;
- Where the Complainant introduces trivial or irrelevant information which they expect to be taken into account and commented on;
- Where The Complainant raises large numbers of detailed but unimportant questions, and insists they are fully answered, often immediately and to their own timescales;
- Where the Complainant makes unjustified complaints about staff who are trying to deal with the issues, and seeks to have them replaced;
- Where the Complainant changes the basis of the complaint as the investigation proceeds;
- Where the Complainant seeks an unrealistic outcome, such as the inappropriate dismissal of staff;
- Where the Complainant knowingly provides falsified information and/or publishes unacceptable information on social media or other public forums;

Vexatious or Frivolous Complaints

The College similarly reserves the right to deviate from the Complaints Procedure in circumstances in which the College considers that the nature of any complaint is vexatious, frivolous, repetitive and/or has clearly insufficient grounds or merit. Examples of complaints which the College may consider to fall within any of these categories include:-

- Complaints which are obsessive, persistent, harassing, prolific, repetitious;
- Insistence upon pursuing unmeritorious complaints and/or unrealistic outcomes beyond all reason;
- Insistence upon pursuing meritorious complaints in an unreasonable manner;
- Complaints which are designed to cause disruption or annoyance
- Demands for redress that lack any serious purpose or value.
- Where the complainant's complaint is the same, similar to or based on the same facts of a complaint which has already been considered in full.

Deviation from the Procedure

In any of the above circumstances, the College may take any one or more of the following steps:-

- Inform the complainant that their behaviour is unacceptable or unreasonably persistent and ask them to change it;
- Take steps to restrict the complainant's access to the College, such as requesting contact in a particular form (for example, letters only), requiring contact to take place with a named person only, restricting telephone calls to specified days and times or banning the complainant from the College's premises.
- Refuse to consider the complaint

In all cases we will write to tell the complainant why we believe his or her behaviour is unacceptable or unreasonably persistent, what action we are taking and the duration of that action. We may take the decision not to respond to any further correspondence where:

- We have taken every reasonable step to address the complainant's concerns;
- The complainant has been given a clear statement of our position and their options and continues to contact us repeatedly, making substantially the same points each time.

The case for ceasing further correspondence is stronger where:

- Letters, emails, or telephone calls are often or always abusive or aggressive or make insulting personal comments about or threats towards staff;
- We have reason to believe the complainant is contacting us with the intention of causing disruption or inconvenience;
- Where the behaviour is so extreme that it threatens the immediate safety and members of the College.

In the above circumstances, we will consider other options. For example reporting the matter to the police or taking legal action. In such cases, we may not give the complainant prior warning of that action.

Complaint Campaigns

For the purposes of this Procedure, a complaint campaign is defined as a complaint from three or more separate individuals which are all based on the same subject. Depending on the nature of the complaint, in these circumstances we may deviate from this Procedure and instead:-

- send a template response to all complainants and/or ;
- publish a single response on the College's website.