



External Feedback Policy & Complaints Procedure

Policy Statement

The College strives to provide a positive experience for all, including those who visit, engage with, or otherwise interact with the College. To help the College achieve this aim, feedback is welcomed and the College is committed to learning from the feedback it receives, whether positive or negative. The College takes all feedback – including compliments, suggestions and 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 and reserves the right to refer matters to another College policy or procedure where more appropriate.

Application & Scope

This policy and the procedure set out below relate to feedback provided by any individual who is not a current College member, unless the matter is more appropriately dealt with under another College policy, contractual process, statutory process, or legal/regulatory route.

For the purposes of this policy, “current College member” includes current St Edmund’s College students, staff, Fellows and senior members. “Non-College members” may include visitors, guests, alumni, applicants, suppliers, partner organisations, members of the public, and others who interact with the College but are not current College members. Complaints by current students, staff, Fellows, senior members, or other current College members should be handled under the relevant College policy or procedure.

For the avoidance of doubt, students of other Colleges within the University of Cambridge are treated as non-College members for the purposes of this policy where their feedback or complaint relates to St Edmund’s College.

The College will make reasonable adjustments, where appropriate, to support individuals to provide feedback or engage with this procedure. Individuals who require assistance with accessing or using this procedure should contact grcm@st-edmunds.cam.ac.uk.

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, to grcm@st-edmunds.cam.ac.uk

- By any other reasonable method, where the individual is unable to use the above methods

The College may ask the complainant to provide further information, evidence, contact details, or proof of authority where this is needed to understand, investigate, or respond to the complaint.

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 an individual's experience with the College, that the individual feels may require a response or resolution.

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). The College will consider complaints made outside of this time frame if exceptional circumstances apply; however, the College reserves 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. This time limit does not restrict any statutory rights or regulatory complaint routes which may apply. 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 an individual is unhappy with the attitude or behaviour of any College member, including students, Fellows, senior members and staff. The College may refer such matters to the relevant internal procedure, including staff, student, safeguarding, disciplinary, dignity at work, or other applicable procedures.
- Where an individual is unhappy with the way the College has provided a service, handled a matter, or communicated with the individual, unless the concern is more appropriately dealt with under another College policy or procedure;
- Where an individual is dissatisfied with how the College has delivered policies, or where the individual is unhappy with a policy.

Where a complaint is referred to another internal process, the College will consider what information can appropriately be shared with the complainant, having regard to confidentiality, data protection, and the rights of any individuals involved.

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 the complainant refers the matter immediately to the relevant authorities. The College may also take such steps as it considers necessary and proportionate to manage any immediate risk, comply with safeguarding obligations, or protect members of the College community and others.

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, where another College policy or procedure applies (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, including requests made under the Freedom of Information Act or Environmental Information Regulations. Concerns about data protection rights requests should be handled under the College's [Data Protection Policy](#).
- A professional disagreement by a partner organisation or supplier, including contractual disputes.
- Legal action, threatened legal action, pre-action correspondence, or compensation claims.
- Appeals against admissions decisions, although complaints about the administration of an admissions process may be considered where appropriate.
- Academic or examination appeals.

Data Protection Complaints

Complaints or concerns about the College's handling of personal data, compliance with data protection law, or response to a data protection rights request should be raised and considered under the College's [Data Protection Policy](#). This includes concerns that personal data has been mishandled, that the College has failed to comply with data protection law, or that it has not responded properly to a rights request. Data protection complaints should normally be sent to the College Data Protection Lead at grcm@st-edmunds.cam.ac.uk. Further information, including how such complaints will be acknowledged, investigated and responded to, is set out in the College's [Data Protection Policy](#).

Confidentiality

The College will maintain the confidentiality of all personal information processed as part of any complaint and only disclose it to other relevant parties where it is necessary and lawful to do so, including for the purposes of considering or investigating the complaint, obtaining advice, managing risk, safeguarding individuals, complying with legal or regulatory obligations, or taking appropriate action under another College procedure.

However, if the College is informed of anything that makes it think that an individual is unsafe or at risk of being harmed, the College will pass this on to the appropriate authority for action. Where possible and appropriate, the College will explain this to the complainant, but there may be circumstances where this is not possible, for example where doing so may increase risk or prejudice an investigation.

Having the complainant's personal details helps the College engage with the complainant in the best way through its feedback processes. Providing contact details enables the College to clarify the complaint, investigate it effectively, and provide a response. If an individual is raising an issue on behalf of someone else, the College reserves the right to inform that person that the individual has contacted the College. Further information about the way in which the College handles personal data can be found in the College's [data protection policy and statements](#).

The College will **not** normally investigate anonymous complaints under this procedure. However, the College may consider anonymous information where it raises issues of safeguarding, serious misconduct, legal or regulatory compliance, risk to individuals, or matters otherwise requiring action.



Complaints Procedure

If the College has determined that the feedback constitutes a complaint, the College will normally acknowledge this in writing within 3 working days of receipt. The College may ask the complainant to provide further information, clarify the issues they wish to raise, identify the outcome they are seeking, or provide evidence of authority if they are raising the complaint on behalf of another person.

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 normally oversee its handling and resolution. If a complaint directly relates to the Governance, Risk and Compliance Manager, or if there is another actual or perceived conflict of interest, an appropriate alternative person will be appointed to oversee the complaint.

The complaint will then be considered in accordance with the below four-stage procedure. The College may vary this procedure where it is reasonable and proportionate to do so, including where a complaint is urgent, complex, raises issues which fall under another College procedure, involves a conflict of interest, or requires immediate action to manage risk.

Stage One – Informal Resolution

- The College will always try to resolve the issue in the easiest, most direct way and as informally as possible before entering the next stages of the formal procedure.
- The College will review the information that the complainant has provided and provide an informal response confirming whether the College agrees with all or part of the complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- The College will explain why it does not agree, if this is the case.
- The College will endeavour to respond to the complainant within 10 working days. If this is not possible, the College will contact the complainant and explain why and, where possible, provide an updated response date.
- If the complainant is not satisfied with the outcome of the complaint, they should contact the College within 10 working days of receiving the Stage One response, explaining why they remain dissatisfied and what outcome they are seeking. The College will then decide whether it is appropriate to escalate the complaint to Stage Two.

Stage Two – Formal Investigation

- The Stage Two Procedure will be adopted when:
 - The complainant has communicated that they are dissatisfied with the resolution to any complaint considered under Stage One and the College has decided that it is appropriate to escalate the complaint to the formal investigation stage.
 - The College considers that the nature or seriousness of the complaint requires immediate escalation to Stage Two.
- The College expects that, where possible, all relevant information is provided to enable it 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 the College may make. The late provision of new information which the complainant would like to be considered may impact the College's ability to respond within the timescale stated below.

- Where new information is introduced, the College will determine whether this information represents a significant change to the scope of the original complaint, in which case the College may consider that this constitutes a complaint requiring separate investigation.
- Complaints considered under Stage Two will be investigated by an appropriate, suitably independent and sufficiently senior member of staff or College Officer.
- 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 the complaint.
 - May recommend actions needed to bring the complaint to a satisfactory conclusion, and make arrangements for these to be undertaken, where appropriate. This may include an explanation, apology, service improvement, procedural change, referral to another College process, or other appropriate action.
- The College will let the complainant know if it agrees with all or part of the complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- The College will explain why it does not agree, if this is the case.
- The College will endeavour to respond to the complainant within 20 working days of confirming that the complaint has been escalated to Stage Two. If this is not possible, the College will contact the complainant and explain why and provide an updated response date. Complaints received towards the end of Full Term or outside Full Term may require longer response times, particularly where relevant individuals are unavailable.
- If the complainant is not satisfied with the outcome of the complaint following formal investigation under Stage Two, they should contact the College within 10 working days of receiving the Stage Two response, explaining why they remain dissatisfied and what outcome they are seeking. The College will then decide whether it is appropriate to escalate the complaint to Stage Three.

Stage Three – Senior College Officer Review

- The Stage Three Procedure will be adopted when:
 - The complainant has communicated that they are dissatisfied with the resolution to any complaint considered under Stage Two and the College has decided that it is appropriate to escalate the complaint to the Senior College Officer review stage.
- Stage Three will not normally involve a full re-investigation of the complaint. The Senior College Officer will usually consider whether the Stage Two investigation was reasonable, whether the outcome was reasonable in light of the evidence, whether relevant information was properly considered, and whether any further action is appropriate.
- Complaints considered under Stage Three will be reviewed 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 or other relevant individuals where this is considered necessary.
 - May 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.

- The Senior College Officer will let the complainant know if they agree with all or part of the complaint, apologise where appropriate and consider appropriate actions to take to remedy any service failure.
- They will explain why they do not agree, if this is the case.
- They will endeavour to respond to the complainant within 20 working days of confirming that the complaint has been escalated to Stage Three, unless outside Full Term. If this is not possible, the College will contact the complainant and explain why and provide an updated response date.
- The complainant has the right to appeal in certain circumstances if they are not satisfied with the outcome of the complaint following Senior College Officer review 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 or Other Appropriate Senior College Officer

- If the complainant is dissatisfied with the response to the Stage Three complaint, they may submit an appeal in limited circumstances. The appeal must be made in writing within 10 working days of receipt of the Stage Three response and should detail the reason for the appeal, which must be on one or more of the grounds set out below. Appeals against the 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:
 - The complainant believes that the College has not handled the complaint in accordance with the provisions of this Policy and Complaints Procedure in a material way;
 - The complainant has new material information or evidence which, for valid reasons which must be specified, they were unable to provide earlier in the process;
 - The complainant believes that there was bias or a reasonable perception of bias during the investigation of the complaint at Stage Three;
 - The complainant believes that the outcome was unreasonable in light of the information available.
- 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 reasonable notice. Any meeting may also be attended by a College Officer or appropriate member of staff who has not previously been involved in the complaint.
- Where the Master has had prior involvement in the complaint, is the subject of the complaint, or is otherwise conflicted, the appeal will be referred to another appropriate senior College Officer.
- The outcome of the appeal will be confirmed in writing to the complainant, normally within 20 working days, unless outside Full Term. If this is not possible, the College will explain the reason for the delay and provide an updated response date. The outcome of the appeal is final and represents the completion of the College's internal complaints 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 will consider individual circumstances and any reasonable adjustments that may be appropriate. 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, persistent, abusive, or otherwise disproportionate. Examples of this include:

- Where the complainant's behaviour or language towards members of the College is abusive, offensive, discriminatory or threatening;
- Where the complainant's behaviour is hindering the College's 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;
- Where 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 confidential, abusive, threatening, discriminatory, defamatory, or personal information on social media or other public forums;

Unreasonable, Persistent, Vexatious or Frivolous Complaints

The College reserves the right to restrict or decline further consideration of a complaint where it reasonably considers that the complaint is vexatious, frivolous, repetitive, manifestly without merit, or has already been considered fully under this procedure.

Examples of complaints which the College may consider to fall within any of these categories include:

- Complaints which are obsessive, persistent, harassing, prolific, repetitive;
- 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 as 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 where lawful, necessary and proportionate, 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 restricting access by the complainant to the College’s premises.
- Refuse to consider the complaint further, or close the complaint, where it is reasonable and proportionate to do so.

Where it is practicable and appropriate to do so, the College will write to the complainant to explain why it believes their behaviour is unacceptable or unreasonably persistent, what action it is taking and the duration of that action. The College may take the decision not to respond to any further correspondence where:

- The College has taken every reasonable step to address the complainant’s concerns;
- The complainant has been given a clear statement of the College’s position and their options and continues to contact the College 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;
- The College has reason to believe the complainant is contacting the College with the intention of causing disruption or inconvenience;
- The behaviour is so extreme that it threatens the immediate safety or wellbeing of the College or its members.

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

Collective or Coordinated Complaints (“Complaint Campaigns”)

For the purposes of this Procedure, a complaint campaign is a complaint, or series of complaints, received from multiple individuals about substantially the same issue or based on substantially the same facts. Depending on the nature and volume of the complaints, the College may adapt this Procedure and instead:

- Send a template response to all complainants; and/or
- Publish a single response on the College’s website.

Record-Keeping

The College will maintain appropriate records of complaints handled under this policy and procedure, including the date received, the nature of the complaint, key correspondence, investigation notes, outcomes, actions taken, and any learning points identified. Complaint records will be handled confidentially, retained in accordance with the College’s Records Retention Schedule, and used where appropriate to support accountability, service improvement, risk management, and organisational learning.

Review

This policy and procedure will be reviewed every three years, or earlier where required by legal, regulatory, operational or governance changes. The review will consider the effectiveness of the procedure, any relevant complaints themes or learning points, and any changes required to ensure that the policy remains clear, fair, proportionate and fit for purpose.