

# HiQual UK

# COMPLAINTS POLICY

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| Document Control Item | Details                                                                                   |
|-----------------------|-------------------------------------------------------------------------------------------|
| Policy Reference      | HQUK-POL-COM-001                                                                          |
| Version               | 1.0                                                                                       |
| Policy Status         | Approved                                                                                  |
| Effective Date        | 20 July 2026                                                                              |
| Next Review Date      | 20 July 2027                                                                              |
| Policy Owner          | Dr James, Head of Quality Assurance                                                       |
| Approved By           | HiQual UK Academic and Standards Committee                                                |
| Review Cycle          | Annual, or earlier where regulatory, operational or organisational changes require review |
| Classification        | Public Policy                                                                             |

*Approved for organisational use*

## 1. Purpose

HiQual UK is committed to providing learners, approved centres, assessment personnel, stakeholders and other users of its services with a fair, transparent, consistent and professional complaints process.

The purpose of this Complaints Policy is to establish a clear procedure for receiving, investigating, resolving and recording complaints concerning HiQual UK qualifications, services, personnel, approved centres and associated activities.

HiQual UK recognises complaints as an important source of information for quality improvement. Complaints will therefore be considered objectively and proportionately, with appropriate corrective and preventive action taken where weaknesses or failures are identified.

This policy is designed to support the principles of fairness, impartiality, accountability, transparency, confidentiality, proportionality and continuous improvement expected of a professional awarding organisation.

## 2. Scope

This policy applies to:

- Learners and candidates registered on HiQual UK qualifications.
- Applicants and prospective learners where the matter concerns a HiQual UK service.
- Approved centres and their authorised personnel.
- Assessors, internal quality assurers, tutors and other assessment personnel.
- Employers, professional stakeholders and other relevant third parties.
- HiQual UK employees, contractors and representatives.
- Complaints concerning services, procedures, administration, communications or conduct associated with HiQual UK.

Where a complaint concerns an approved centre, HiQual UK may require the complainant to complete the centre's own complaints procedure before escalation to HiQual UK, unless the matter is sufficiently serious, urgent or directly related to HiQual UK's awarding functions.

## 3. Regulatory and Standards Alignment

HiQual UK will maintain its complaints arrangements with reference to applicable UK regulatory expectations and recognised good practice for awarding organisations.

This policy has been developed with consideration of:

- Ofqual General Conditions of Recognition, particularly requirements concerning complaints and appeals.
- Ofqual guidance concerning complaints about awarding organisations and qualifications.
- Principles of good complaint handling, including fairness, accountability, proportionality, putting matters right and continuous improvement.
- Relevant UK equality, data protection and administrative law principles, where applicable.
- International quality management principles relevant to complaint handling and continual improvement.
- Good practice demonstrated by established UK awarding organisations.

Ofqual requires regulated awarding organisations to maintain appropriate appeals arrangements and comply with applicable complaints requirements.

**Important: Publication of this policy does not, by itself, constitute a claim that HiQual UK or any individual HiQual UK qualification is regulated or recognised by Ofqual. Regulatory status will be stated separately and accurately on official HiQual UK documentation.**

## 4. Definition of a Complaint

For the purpose of this policy, a complaint is an expression of dissatisfaction concerning an action, omission, decision, service, conduct, process or standard of service provided by, or on behalf of, HiQual UK which requires investigation and a formal response.

Examples may include:

- Failure to follow a published HiQual UK policy or procedure.
- Unreasonable administrative delay.
- Poor or inappropriate customer service.
- Incorrect or misleading information provided by HiQual UK.
- Concerns about the conduct of HiQual UK personnel.
- Concerns regarding the administration of a qualification.
- Concerns regarding an approved centre where HiQual UK has responsibility for the relevant matter.
- Concerns regarding certification or registration administration.
- Concerns regarding the handling of a previous complaint.
- Concerns about unfair or inconsistent application of a HiQual UK process.
- Concerns that could affect confidence in the integrity of a HiQual UK qualification or awarding process.

A complaint does not automatically mean that HiQual UK accepts that an error or failure has occurred.

## 5. Matters That Are Not Normally Treated as Complaints

Certain matters must be dealt with under separate policies or procedures.

### 5.1 Assessment Results

A disagreement with an assessment result or academic judgement should normally be addressed through the applicable Appeals Policy or Enquiry About Results Procedure, rather than through this Complaints Policy.

Ofqual similarly distinguishes complaints from appeals against assessment results.

### 5.2 Malpractice and Maladministration

Allegations involving malpractice, maladministration, assessment irregularities, falsification, plagiarism, cheating, certification fraud or other integrity concerns will be managed under the applicable Malpractice and Maladministration Policy.

### 5.3 Reasonable Adjustments and Special Consideration

Requests or disputes relating specifically to reasonable adjustments or special consideration will normally be managed through the relevant policy and appeals arrangements.

### 5.4 General Enquiries

Requests for information, clarification or routine assistance are not normally complaints unless the matter develops into an expression of dissatisfaction requiring formal investigation.

## 5.5 Commercial or Contractual Matters

Fee disputes, refunds, commercial arrangements or contractual matters may be considered under the applicable terms and conditions or financial procedures.

Where a matter contains both a complaint and another type of case, HiQual UK may manage the different elements under separate procedures.

## 6. Principles of Complaint Handling

HiQual UK will manage complaints according to the following principles.

### 6.1 Fairness

Complaints will be considered objectively and without predetermined conclusions.

### 6.2 Independence

Where reasonably practicable, a complaint will be investigated by a person who was not directly responsible for the matter being complained about.

### 6.3 Impartiality

No person will participate in the investigation or decision-making process where an actual, potential or perceived conflict of interest exists.

### 6.4 Accessibility

HiQual UK will take reasonable steps to ensure that its complaints process is accessible to learners and other stakeholders.

### 6.5 Confidentiality

Information relating to a complaint will be shared only with individuals who require access for legitimate investigation, decision-making, safeguarding, regulatory, legal or quality assurance purposes.

### 6.6 Proportionality

The depth and complexity of an investigation will be proportionate to the seriousness and potential impact of the complaint.

### 6.7 Timeliness

Complaints will be acknowledged, investigated and concluded within reasonable and published timescales wherever practicable.

### 6.8 Transparency

Complainants will be informed about the progress and outcome of their complaint, subject to confidentiality and legal restrictions.

### 6.9 Continuous Improvement

Complaint outcomes and trends will be reviewed to identify systemic issues and opportunities for improvement.

## 7. Who May Make a Complaint

A complaint may be submitted by:

- A learner or candidate.
- An approved centre.
- An authorised centre representative.
- A member of HiQual UK personnel.
- An assessor, tutor or quality assurance professional.
- An employer or professional stakeholder where they have a legitimate interest.
- A parent, guardian or authorised representative where appropriate.
- A third party acting with appropriate authority or consent.

Anonymous complaints may be accepted where sufficient information is provided to allow a meaningful investigation.

However, HiQual UK may be unable to provide a detailed response to an anonymous complainant where there is no means of communication.

## 8. Informal Resolution

HiQual UK encourages concerns to be resolved informally where appropriate.

A learner or stakeholder may first raise the matter with the relevant HiQual UK department or approved centre.

Informal resolution may include:

- Clarification of information.
- Correction of an administrative error.
- Provision of additional information.
- Apology where appropriate.
- Corrective administrative action.
- Referral to the appropriate formal procedure.

Informal resolution will not be used to prevent a person from making a formal complaint where the seriousness of the matter warrants formal investigation.

## 9. Formal Complaint Procedure

### Stage 1: Submission

A formal complaint should normally be submitted in writing and should include:

- Name of the complainant.
- Contact details.
- Learner or candidate number, where applicable.
- Qualification title and relevant centre, where applicable.
- Description of the complaint.
- Relevant dates and events.
- Names or roles of individuals involved, where known.
- Copies of relevant evidence.
- Details of any steps already taken to resolve the matter.
- The outcome or remedy being sought, where applicable.

HiQual UK may request additional information where necessary.

### Stage 2: Acknowledgement

HiQual UK will normally acknowledge receipt of a formal complaint within 5 working days.

The acknowledgement will normally confirm:

- Receipt of the complaint.
- The person or department responsible for handling it.
- The reference number assigned to the complaint.
- Whether further information is required.
- The expected timescale for the investigation.

### Stage 3: Initial Review

The responsible officer will conduct an initial review to determine:

1. Whether the matter falls within this policy.
2. Whether another HiQual UK policy is more appropriate.
3. Whether the complaint should first be addressed by an approved centre.
4. Whether urgent action is required.
5. Whether there is any conflict of interest.
6. Whether additional evidence is required.
7. Whether the complaint requires referral to senior management or a committee.

Where the complaint falls under another procedure, the complainant will be informed and the matter will be referred appropriately.

### Stage 4: Investigation

The investigator may:

- Review documents and records.
- Examine relevant correspondence.
- Interview or seek statements from relevant individuals.
- Contact an approved centre where appropriate.
- Review assessment or quality assurance records.
- Examine relevant policies and procedures.
- Consider evidence submitted by the complainant.
- Identify whether similar issues have occurred previously.
- Consult an independent or senior officer where required.

The investigation will be conducted objectively and without unnecessary delay.

### Stage 5: Outcome

Following the investigation, HiQual UK will issue a written outcome.

The outcome may:

- Uphold the complaint in full.
- Uphold the complaint in part.

- Not uphold the complaint.
- Confirm that the matter is more appropriately dealt with under another procedure.
- Identify corrective action.
- Recommend preventive action.
- Refer the matter to another internal process.
- Confirm that no further action is required.

Where appropriate, the outcome will explain the evidence and reasoning considered.

## 10. Target Timescales

HiQual UK will aim to manage formal complaints according to the following target timescales:

Stage Target

Complaint acknowledgement Within 5 working days

Initial review Within 10 working days

Standard investigation Normally within 20 working days

Complex investigation Normally within 30 working days

Final written outcome As soon as reasonably practicable following investigation

Escalation request Normally within 10 working days of outcome

Where a complaint is unusually complex, involves multiple parties, requires external evidence, or is subject to another investigation, HiQual UK may extend the timescale.

The complainant will be informed of significant delays and, where reasonably possible, provided with an updated target date.

These are internal service targets and do not prevent HiQual UK from taking additional time where a fair and thorough investigation reasonably requires it.

## 11. Escalation and Review

Where a complainant believes that a complaint has not been properly addressed, they may request an internal review.

An escalation request should identify:

- The parts of the original complaint that remain unresolved.
- Any material information that was not considered.
- Any procedural concern regarding the original investigation.
- The reasons why the complainant considers the outcome unreasonable or incomplete.

The escalation will normally be reviewed by a suitably senior person who was not responsible for the original decision.

Where appropriate, HiQual UK may appoint an independent reviewer or panel.

The review will normally consider whether:

- The original procedure was followed.
- Relevant evidence was considered.
- The decision was reasonable and proportionate.
- Any material information was overlooked.
- Further action is justified.

The review outcome will normally represent HiQual UK's final internal decision.

## 12. Complaints Concerning Approved Centres

Where a complaint relates primarily to an approved centre, the complainant should normally use the centre's complaints process first.

HiQual UK may intervene or accept a complaint directly where:

- The centre has failed to operate an effective complaints process.
- The complainant has exhausted the centre's procedure.
- The matter concerns HiQual UK's awarding functions.
- The matter concerns certification or qualification decisions controlled by HiQual UK.
- The complaint involves serious malpractice or maladministration.
- There is a potential conflict of interest at centre level.
- There is a significant risk to learners or the integrity of a HiQual UK qualification.
- The circumstances justify direct intervention.

Approved centres are expected to maintain an appropriate complaints procedure and cooperate fully with HiQual UK investigations.

## 13. Confidentiality and Data Protection

HiQual UK will handle complaint information responsibly and in accordance with applicable data protection requirements.

Information will be:

- Collected for legitimate purposes.
- Accessed only by authorised personnel.
- Stored securely.
- Retained in accordance with applicable retention requirements.
- Shared only where there is a legitimate reason to do so.

Where a complaint concerns another individual, HiQual UK may be unable to disclose confidential personal information about that person.

Where an investigation requires information to be shared with an approved centre or another party, HiQual UK will seek to limit disclosure to information necessary for the investigation.

## 14. Anonymous Complaints

HiQual UK may investigate anonymous complaints where the information provided is sufficiently specific and credible.

Anonymous complaints may be particularly important where they concern:

- Serious malpractice.
- Maladministration.
- Qualification fraud.
- Conflicts of interest.
- Safeguarding concerns.
- Threats to assessment integrity.
- Serious misconduct.

Where the complainant's identity is unknown, HiQual UK may be unable to provide feedback on the outcome.

## 15. Vexatious, Abusive or Repetitive Complaints

HiQual UK recognises that a person may make repeated complaints where legitimate issues remain unresolved.

However, HiQual UK may restrict further correspondence where a complaint is demonstrably:

- Abusive or threatening.
- Harassing towards staff.
- Repeated without materially new information.
- Excessively disproportionate in volume or frequency.
- Intended primarily to disrupt normal operations.
- Based on matters that have already received a final internal determination.

Any decision to restrict communication will be proportionate, documented and subject to appropriate management oversight.

## 16. Conflicts of Interest

Any individual involved in receiving, investigating or determining a complaint must declare any actual, potential or perceived conflict of interest.

Examples include:

- Personal involvement in the original matter.
- A close personal or professional relationship with a party involved.
- Financial interests connected with the complaint.
- Previous involvement in a decision being challenged.
- Any circumstance that could reasonably affect impartiality.

Where a conflict exists, another suitably competent person will be appointed wherever practicable.

This requirement supports the principles established in HiQual UK's Conflicts of Interest Policy.

## 17. Safeguarding and Serious Concerns

Where a complaint raises concerns about:

- Safeguarding.

- Serious misconduct.
- Criminal activity.
- Threats to learner safety.
- Qualification fraud.
- Serious malpractice.
- Significant regulatory non-compliance.

HiQual UK may immediately refer the matter to the appropriate senior officer or specialist procedure.

The normal complaints timetable may be suspended where necessary to protect individuals, preserve evidence or allow another formal investigation to take place.

## 18. Corrective and Preventive Action

Where a complaint identifies an error, weakness or systemic problem, HiQual UK may implement corrective or preventive action.

Actions may include:

- Correcting learner or centre records.
- Reissuing documentation where justified.
- Reviewing an administrative process.
- Providing additional staff training.
- Updating policies or procedures.
- Increasing centre monitoring.
- Conducting additional quality assurance activity.
- Reviewing assessment arrangements.
- Implementing additional controls.
- Referring systemic issues to the Academic and Standards Committee.

Where an investigation identifies that other learners or centres may have been affected, HiQual UK will consider whether further investigation or remedial action is necessary.

## 19. Monitoring and Quality Improvement

Complaints will not be considered solely as individual cases.

HiQual UK will periodically analyse complaint data to identify:

- Recurring issues.
- Trends by qualification or centre.
- Administrative weaknesses.
- Assessment or certification issues.
- Customer service concerns.
- Training or staff development requirements.
- Potential risks to qualification integrity.
- Opportunities for policy and process improvement.

Significant trends will be reported through the appropriate quality assurance and governance structures.

The Academic and Standards Committee may require additional action where complaint trends indicate a material risk to academic standards, learner protection or the integrity of HiQual UK qualifications.

## 20. Complaint Records

HiQual UK will maintain appropriate records of formal complaints.

Records may include:

- Complaint reference number.
- Date received.
- Name and status of complainant, where known.
- Qualification or centre involved.
- Nature of complaint.
- Evidence received.
- Investigation undertaken.
- Personnel involved.
- Conflicts of interest declared.
- Decisions and reasons.
- Corrective or preventive action.
- Date of closure.
- Escalation or review information.

Complaint records will be maintained securely and retained in accordance with HiQual UK's document retention requirements.

## 21. Governance Responsibilities

### Governing Board

The Governing Board has overall responsibility for ensuring that HiQual UK maintains effective governance arrangements for complaints.

### Academic and Standards Committee

The Academic and Standards Committee provides oversight of complaints that may affect academic standards, qualification integrity or learner protection.

### Head of Quality Assurance

The Head of Quality Assurance is responsible for operational oversight of the complaints process, monitoring trends and ensuring appropriate corrective action.

### Complaints Investigator

The appointed investigator is responsible for conducting an impartial, evidence-based investigation and preparing an appropriate outcome.

### Approved Centres

Approved centres must maintain appropriate local complaints arrangements, cooperate with HiQual UK investigations and escalate matters to HiQual UK where required.

### All HiQual UK Personnel

All personnel are expected to:

- Treat complainants professionally.
- Avoid conflicts of interest.
- Maintain confidentiality.
- Preserve relevant evidence.
- Follow this policy.
- Escalate serious concerns appropriately.

## 22. Protection from Retaliation

No learner, centre, employee or stakeholder should suffer unfair treatment merely because they have raised a genuine complaint or participated in a complaint investigation.

HiQual UK will not tolerate retaliation, intimidation or victimisation connected with the legitimate use of its complaints process.

This protection does not prevent HiQual UK from taking appropriate action where a person engages in misconduct, abuse or deliberately false allegations.

## 23. External Regulatory or Other Review

Where a HiQual UK qualification or activity is subject to regulation by a competent external regulator, the complainant may have additional rights under the relevant regulatory framework.

Where applicable, complainants will be informed of the appropriate external escalation route after completing the relevant HiQual UK internal process.

For Ofqual-regulated qualifications, Ofqual generally expects complainants to complete the awarding organisation's complaints process before approaching Ofqual, subject to its published rules and exceptions.

HiQual UK will not state or imply that an external regulator can overturn an academic decision unless the applicable regulator's powers expressly permit such action.

## 24. Accessibility and Reasonable Adjustments

HiQual UK will take reasonable steps to ensure that its complaints process is accessible.

Where appropriate, reasonable adjustments may be considered for complainants who require additional support to access the process.

Examples may include:

- Alternative communication formats.
- Additional time to provide information.
- Assistance through an authorised representative.
- Appropriate communication support.

Any reasonable adjustment must preserve the integrity and fairness of the complaints process.

## 25. Good Faith

Complaints should be submitted honestly and with sufficient information to allow HiQual UK to understand and investigate the concern.

A complaint will not be rejected merely because the complainant has made an error in terminology or does not identify the correct HiQual UK procedure.

HiQual UK will seek to identify the substantive issue and route it to the appropriate process.

## 26. Policy Review

This policy will be reviewed at least annually and sooner where required due to:

- Changes in applicable regulatory requirements.
- Changes to HiQual UK governance arrangements.
- Significant complaint trends.
- Changes to qualification delivery or assessment systems.
- Findings from internal or external quality assurance.
- Legal or data protection developments.
- Lessons learned from complaint investigations.

The Policy Owner will recommend amendments to the appropriate governance body for approval.

## 27. Related Policies and Procedures

This policy should be read alongside:

- Academic Governance Policy.
- Quality Assurance Policy.
- Assessment Policy.
- Appeals Policy.
- Qualification Approval Policy.
- Centre Recognition Policy.
- Centre Monitoring Policy.
- Malpractice and Maladministration Policy.
- Conflicts of Interest Policy.
- Reasonable Adjustments and Special Consideration Policy.
- Certification Policy.
- Learner Protection and Safeguarding Policy.
- Data Protection and Privacy Policy.
- Whistleblowing Policy.
- Records Management and Retention Policy.

## 28. Document Control

| Document Control Item | Details                                                |
|-----------------------|--------------------------------------------------------|
| Organisation          | HiQual UK                                              |
| Policy Title          | Complaints Policy                                      |
| Policy Reference      | HQUK-POL-COM-001                                       |
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| Applies To            | Learners, Centres, Personnel and Relevant Stakeholders |

## 29. Version Control

| Version | Date         | Description of Change                              | Author                              | Approval                         |
|---------|--------------|----------------------------------------------------|-------------------------------------|----------------------------------|
| 1.0     | 20 July 2026 | Initial publication of HiQual UK Complaints Policy | Dr James, Head of Quality Assurance | Academic and Standards Committee |

## 30. Policy Statement

HiQual UK is committed to ensuring that complaints are handled fairly, consistently, independently and within reasonable timescales.

Every legitimate complaint will be treated as an opportunity to investigate concerns, protect learners, maintain confidence in HiQual UK qualifications and strengthen the organisation's quality assurance and governance arrangements.

HiQual UK will use appropriate complaint findings to support continual improvement and to ensure that its qualifications, assessment arrangements, approved centres and services continue to operate with appropriate standards of integrity, transparency and accountability.