University of Warwick staff and students are invited to consider how our current student feedback and complaints processes can be enhanced and student satisfaction improved as a result through the development of an integrated Student Complaints Resolution pathway within a revised University Feedback and Complaints Resolution Framework being introduced from the Autumn Term 2014. This would replace the existing Student Academic Complaints procedure, the process for non-academic service complaints and provide a clearer structure to complaints submitted under the Dignity at Work and Study Policy. The pilot would be undertaken in the context of building capacity and capability at all levels, including front-line services, in effective complaints resolution and in capturing and responding dynamically and proactively to student feedback.

This paper includes the following sections and Appendices:

1. Key Recommendations for Consideration and Approval
2. Current Status and Key Drivers for Change
3. Objectives of a Revised University Feedback and Complaints Resolution Framework
4. Overview of the Related Process of Stakeholder Consultation and Formal Considerations
5. Summary of the Proposals for an integrated Student Complaints Resolution Pathway, including a merger of the existing student complaints processes into one, three stage process:
   - Stage 1: Frontline / Local Resolution of Concern or Informal Complaint
   - Stage 2: Formal Departmental Resolution with Central Support
   - Stage 3: Formal Institutional Review and Final Resolution
   Should the complaint not be upheld at Stage 3, students would be referred to the Office of the Independent Adjudicator (OIA).

These proposals are developed taking into account the development of a Good practice framework for handling complaints and academic appeals to be published by the OIA as well as the related Quality Assurance Agency (QAA) Codes of Practice.


QAA Chapter B9 academic appeals and student complaints available at: http://www.qaa.ac.uk/Publications/InformationAndGuidance/Pages/quality-code-B9.aspx

6. Outline of the Ambitious Timetable for the Pilot

Further related proposals and associated documentation under development is available at:

www.warwick.ac.uk/go/governance/complaintsandfeedback/frameworkconsultation/

As at 11 June 2014
1. Recommendations for Consideration and Approval

Staff and students are invited to:

(a) Review and comment on the proposed integrated Student Complaints Resolution Pathway (see summary diagram and key proposals outlined in section 4), acknowledging this would replace the current Student Academic Complaints Procedure and student non-academic service complaints process as well as the complaints route within the University’s Dignity at Work and Study Policy.

(b) Identify the critical success factors to and key risks of establishing one, integrated Student Feedback and Complaints Resolution Framework and piloting it from the start of the Autumn Term 2014.

(c) Consider the key points that should be incorporated within the integrated Student Complaints Resolution Procedure and related information, advice and guidance for staff and students.

All proposals will continue to be updated in the light of the ongoing consultation with a range of key stakeholders with the 2014/2015 Student Complaints Resolution Procedure being published in September 2014.

2. Current Status and Key Drivers for Change

The University currently has multiple routes for dealing with formal complaints dependent on the nature of the complaint and broadly whether it is a student, member of staff or external individual who raises an issue. A brief overview of and sign-posting to the various routes are outlined on the following webpage:

www.warwick.ac.uk/go/governance/complaintsandfeedback/

The website highlights that the University welcomes feedback and that complaints should be raised as early as possible informally with local, front-line staff (or another student). A summary of the processes for raising concerns and formal escalation of complaints is outlined. [The page also links to a mechanism for submitting institutional feedback via a simple webform:

www.warwick.ac.uk/go/feedback/ ]

For students, there are currently three main routes for complaints:

| Student Academic Complaints Procedure with formal complaints submitted to the Vice-Chancellor: [http://www2.warwick.ac.uk/services/aro/academiccomplaints/studenntcomplaints](http://www2.warwick.ac.uk/services/aro/academiccomplaints/studenntcomplaints) | For students, the most significantly used complaint route is the Student Academic Complaints Procedure used to complain about any aspect of the teaching and learning process and the provision made by the University to support that process. As members of AQSC will know, the process currently encourages students to contact the relevant individual and/or Head of Department with their issues or complaint informally in the first instance. The complaint, should it not be resolved in this way, can then be escalated by the student to the Vice-Chancellor who then will delegate the Provost/Pro-Vice-Chancellor/Chair of the Graduate School or Board of UG Studies to take the matter forward. The final stage if not resolved ‘informally’ by the individual appointed by the Vice-Chancellor is that it is referred to a formal Complaints Committee. Following the final outcome of the Committee, if the Committee does not uphold the complaint, the student will be issued a Completion of Procedures Letter (COP) and referred to the Office of the Independent Adjudicator (OIA). |


### Dignity at Work and Study Policy with formal student complaints submitted to the Registrar:

http://www2.warwick.ac.uk/services/humanresources/newpolicies/dignity

A student can also submit a formal complaint directly to the Registrar under the current *Dignity at Work and Study Policy*, primarily used for claims of bullying and harassment. Complaints can also be linked to a number of student disciplinary procedures, including the recently revised Regulation 23 on Student Disciplinary Offences.

[NB The Dignity at Work and Study Policy is currently under review.]

### General Complaints about the university administrative and professional services submitted to the Director of Delivery Assurance (outlined on the main webpage above under ‘complaints or feedback relating to other matters’)

A student can make a complaint in relation to a service or other aspect of their student experience that is not related directly to the teaching and learning experience. The complaints procedure advises the student to first contact the local service department but, if they remain dissatisfied, s/he can escalate his/her complaint to the Director of Delivery Assurance (via the complaints@warwick.ac.uk email resource account). Some local complaints procedures exist, for instance the Library and Warwick Accommodation, the latter currently referring appeals formally to the Registrar (http://www2.warwick.ac.uk/services/accommodation/contact/compproc).

Each of the above procedures currently has different investigatory and administrative protocols. Information on the progress of cases and outcomes is captured and monitored separately making compilation of the institutional picture and identifying key areas of improvement onerous.

While the current system of responding to student complaints is not ‘broken’, there are a number of ways the framework and its underpinning protocols and processes could be enhanced and streamlined to deliver a more effective complaints resolution service to students. The nature of complaints is becoming increasingly complex and one case might cover elements across more than one of the three current routes for student complaints. Endeavouring to adhere to each of the procedures can currently lead to delays in resolution and compound the initial issue or concern raised. [This was highlighted in a recent Internal Audit of central university student complaint processes which supported the development of one clear student complaints process.]

Additionally, there is no clear way to differentiate informal and formal complaints at present. This can lead to a lack of clarity as to who should lead on finding a resolution and the appropriate route for escalation should this not be able to be achieved locally by a front-line member of staff. Valuable time can also be spent trying to clarify with the student the details of their complaint and the outcome that they are seeking. Institutionally it has been recognised that we could do more to effectively capture and proactively respond to student feedback at an early stage, reducing the need for issues to be escalated to a complaint. There are currently pockets of good practice in relation to capturing and responding to feedback and in resolving complaints at an early stage, however, practice is inconsistent across the University and we have not institutionally provided proactive advice, guidance and support on effective complaints resolution.

The issues relating to the piloting of the integrated Student Complaints Resolution Pathway in 2014/15 is the main focus area within the overall Framework at this time. The Student Pathway will be implemented, however, in the context of proposals to increase institutional capability more broadly in complaints resolution. **The ambition is to build a culture where dynamic feedback is sought and a dialogue to resolve issues is welcomed at the earliest stage – reflecting on outcomes to improve our services and increase levels of satisfaction.** While this will not be achieved through the piloting of the integrated Pathway alone, this and the overarching Framework should provide a more robust infrastructure on which to build.
3. Objectives of a Revised University Feedback and Complaints Resolution Framework

In the light of the above, the following are put forward as provisional objectives of the overarching revised University Feedback and Complaints Resolution Framework and the underpinning processes to be put in place:

(a) **Increasing transparency and accessibility** for students, staff and other key stakeholders

(b) **Clarifying roles and responsibilities** of those engaged with feedback processes and the investigation and resolution of complaints

(c) Identifying and developing **enhanced tools for early resolution** of complaints (including mediation), particularly in relation to student complaints

(d) Encouraging identification and **resolution of issues and complaints at the local level and at the earliest stage possible**

(e) Supporting the **development of good practice in complaints resolution and effectively responding to feedback** across the University and mechanisms by which it can be sustained

(f) **Enhancing capability and capacity** for obtaining and responding to ad hoc and dynamic feedback and resolving and monitoring complaints, using any issues identified to **improve teaching and learning provision and service performance**

Additionally, in relation to the piloting of an integrated Student Complaints Resolution Pathway, we should be in a better position to assess our alignment with the eventual OIA good practice framework for handling student complaints and academic appeals to be published in September 2014 (see below for further information in this regard).

(g) **Incorporating good practice as set out in the OIA Good Practice Framework on Complaints and Appeals**

4. Process of Stakeholder Consultation and Formal Consideration

The desk-based review of the University’s Feedback and Complaints process has been ongoing over the last year, reflecting on current policy and associated practice, the changing context within higher education, and good practice in complaints handling across sectors and at a diverse range of other HEIs. The piloting of an integrated Student Complaints Resolution Pathway has been strongly supported within the initial consultations with key stakeholders held to date. Initial consultations have so far engaged a range of key stakeholders including a number of the SU Sabbatical Officers, colleagues from the SU Advice and Welfare Centre and Student Support Services, a number of colleagues from academic and service departments (including Senior Officers), and a range of senior academic colleagues.

In addition to a brief presentation about the proposals being provided to the University Research Ethics and Governance Committee (UREGC) at its meeting held 2 June 2014, the proposals were considered as set out in paper QAWG.18/2013-2014 at the meeting of the Quality Assurance Working Group (QAWG) held on 29 May 2014 (QAWG minute 27/13-14 refers) and the meeting of the Academic Quality and Standards Committee held on 10 June 2014. Key issues raised have been noted and proposals have been amended further to that discussion as appropriate.

A further programme of consultation discussions sessions will be conducted over the coming weeks with a view to refining the Framework, the integrated Student Pathway and associated implementation plans in the light of stakeholder views. Go to [www.warwick.ac.uk/go/governance/feedbackandcomplaints/frameworkconsultation](http://www.warwick.ac.uk/go/governance/feedbackandcomplaints/frameworkconsultation) for further information and dates of sessions. These further consultation sessions which will inform the refinement of the underpinning integrated Student Complaints Resolution Procedure, the related online information to be published, as well as the programme of training and briefing that will be held throughout the Autumn Term 2014.
5. **Summary of Proposals for the Pilot of an Integrated Student Complaints Pathway**

The Framework for the Student Complaints Resolution Pathway has been significantly refined in the light of consultations to date and to a certain extent as a result of the publication of the OIA consultation document. Please see the summary diagram outlining the current proposed Student Complaints Resolution Pathway available at [www.warwick.ac.uk/go/governance/complaintsandfeedback/frameworkconsultation/](http://www.warwick.ac.uk/go/governance/complaintsandfeedback/frameworkconsultation/). A summary of key proposals is set out below.

| Stakeholder-Focussed Model with One Integrated Student Complaints Resolution Pathway | The establishment of integrated Student Complaints Resolution Pathway is proposed. While a number of associated regulations and policies (e.g. Dignity at Warwick) will still be applicable, there will be one transparent and accessible route for students to submit formal complaints, as well as advice and guidance as to where to go to in the first instance to raise issues or concerns informally. Students will also be more consistently sign-posted to the range of support available to them within the University. |
| Clear, Three Staged Student Complaints Resolution Process within the overarching Feedback and Complaints Resolution Framework | It is proposed that a clearly demarcated staged process inclusive of informal complaints and formal complaints is established. This should increase accessibility for students and provide enhanced clarity of responsibilities and accountabilities for staff. As outlined, the Framework highlights the need for a strong culture of capturing and responding to feedback in a dynamic way. It is then proposed for the integrated Student Complaints Resolution Pathway to have three stages: Stage 1: Frontline / Local Resolution of Concern or Informal Complaint Stage 2: Formal Departmental Resolution with Central Support Stage 3: Formal Institutional Review and Final University Resolution Should the complaint not be resolved or upheld at Stage 3, students would be referred to the OIA. It is envisaged that the vast majority of issues and concerns raised could be resolved, as is the case now, at Stage 1. It is planned, however, that front line staff will be supported in building additional capability in complaints resolution associated with using student feedback to improve services. Provision of training and development to support this is seen as a key factor in achieving the desired objectives. Where complaints cannot be informally resolved, a more structured and guided way for a student to submit a formal complaint is proposed at Stage 2, acknowledging that the more effective location for seeking resolution is still in most instances the departmental level. The estimated times set out in the summary diagram are subject to change and are currently those set out currently in the OIA document (though ‘days’ has been replaced with ‘University working days’ in the diagram). Compared to the current process, strict adherence to these times would be a step change. In the first instance, it is proposed that of primary
importance is good communication with the complainants, periodically keeping them up to date on progress and providing estimated timescales for resolution where this is possible. While helpful for all parties to have indicative timescales (and these should be met wherever possible), it is not seen at this stage as beneficial to be overly constrained by these, particularly at the informal Stage 1 of the process as this could inversely make it more difficult for a meaningful resolution to be found (rather than only a response being given). It is also acknowledged the complaints involving issues of perceived bullying and harassment can be more complex and a longer period of time may be required. (It should be noted that the OIA are currently proposing not to include this type of complaint in their framework.) Where time periods are likely to take longer than the indicative times given, students should be notified as soon as possible and before the indicative time period has expired of the revised resolution period. Given the step change in expectations of University's to resolve complaints more quickly, further reflection will be required on these following the publication of the OIA Framework in September 2014 and the initial outcomes of the Warwick pilot to be reviewed in early Summer 2015.

Developing Enhanced Advice and Guidance together with a clear Student Complaint Form to Signal Escalation to a Formal Complaint

Advice and guidance for complainants together with an accessible and clear form to capture information necessary to progress complaints effectively and in a timely way are being developed considering similar good practice instituted at other HEIs already and adapting this to fit within the Warwick context. The submission of the institutional complaint form will signify the escalation of the issue to a formal complaint. The form will require complainants to describe what informal ways they have pursued in the first instance to seek resolution, provide a vehicle for them to submit relevant information and evidence to pursue effectively their complaint and encourage them think about what they are seeking by way of resolution. A provisional sample of the type of questions proposed for the Stage 2 formal complaint is available upon request (as the form and the mechanism by which it is submitted is under continual review).

In addition to the network of support already available to students and the deployment of a new Administrative Officer (Complaints Resolution), associated online guidance and information will be developed, including a clear summary diagram for students with cross-connecting links to relevant information at each stage in the complaint process. This is particularly important when highlighting the range of support for students there is available at the University. It is planned that a Warwick Undergraduate Intern is appointed this summer with the express objective of making information on the student complaints process accessible and clear to students.

Building and Enhancing Complaints Resolution Expertise across the University

A central student complaints resolution service will be established to provide advice and expertise in investigations, case handling, complaint resolution and monitoring as well as to increase institutional learning to feed into service and teaching and learning improvements (in particular providing advice and guidance and support to the front-line services and Heads of Academic and/or Administrative Service Departments in complaints resolution). There will be a designated point of contact within the Academic Office for initial enquiries in relation to student complaints. There will continue to be strong liaison between the central Student Complaints Resolution service in the Academic Office and the Delivery Assurance team in building complaints resolution capability.

A programme of training and briefing for front-line staff, Heads of
Department and Services, investigating officers, and members of the Complaints Panel (including Sabbatical Officers) will be established. It is hoped that good practice advice and guidance will be developed and accessible online to access as and when required.

**Full Scale Institutional Pilot to be Held in 2014/2015**

To realise the benefits of increased accessibility, support and clarity for complainants and staff, it is proposed that the pilot of the new integrated Student Complaints Resolution Pathway within a revised Framework be introduced from the start of the 2014 Autumn term, with a review point in Spring and early Summer 2015. Throughout the academic year 2014/2015 good practice would be developed and further communicated.

**Development of early resolution strategies to be deployed (in particular mediation)**

We will be reflecting on the outcomes of a number of other University pilots in relation to early resolution strategies to see what could most effectively be deployed here at Warwick.

Additionally, a review of the use of mediation as an effective tool for early resolution in student cases has been undertaken. Given the strong support received, it is planned that over the course of the 2014/2015 academic year mediation in student cases will also be piloted (see paper AQSC.24/13-14). The proposed Integrated Student Pathway, including submission of Stage 2 formal complaints through a central student complaints resolution service, will enable consideration of where best to deploy mediation.

**Assessing Appropriate Alignment with the OIA good practice framework for handling complaints and academic appeals**

Following on from the development of chapter B9 on Academic appeals and student complaints by the QAA, the OIA just recently launched a consultation on a Good practice framework for handling complaints and academic appeals (see [http://www.oiahe.org.uk/guidance-good-practice-and-events/good-practice-framework.aspx](http://www.oiahe.org.uk/guidance-good-practice-and-events/good-practice-framework.aspx)); response deadline 5 July 2014). The OIA intends to launch the framework in Sept 2014 with a view to the OIA taking into account how institutions apply it from Sept 2015. Pilotng the Integrated Student Feedback and Complaints Resolution Framework over the 2014/2015 academic year fits well with this and will allow us to consider our approach to and alignment with the new OIA framework. Areas of particular consideration in relation to the OIA consultation include but are not exclusive to:

- Dovetailing appropriately the appeals and complaints framework
- Expected typical timelines for resolution at each stage
- Alignment of bullying and harassment complaints with ‘standard’ complaints
- Ensuring appropriate independence at the OIA ‘Review Stage’
- Definitions of (informal/formal) complaints and appeals
- Recording of information relating to informal complaints

6. **Ambitious but Achievable Timetable for Improvement**

As outlined above, there is a significant potential benefit to progressing at pace the development of an integrated Student Complaints Resolution Pathway and piloting it from the start of the 2014/2015 academic year in the light of the medium term development of the overarching revised University Feedback and Complaints Resolution Framework and associated infrastructure. While the timetable is extremely ambitious, it is seen as achievable.
<table>
<thead>
<tr>
<th>Date Range</th>
<th>Activity Description</th>
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<tbody>
<tr>
<td>February – early April 2014</td>
<td>Draft initial summary University Feedback and Complaints Resolution Framework for consultation (focussing on Phase 1: integrated Student Complaints Resolution Pathway)</td>
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<tr>
<td>March/April 2014 and ongoing</td>
<td>Scope operational viability and sustainability of proposals in consultation with key contributors and users</td>
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<tr>
<td>April to June 2014</td>
<td>Refine summary pilot Framework and begin to articulate proposed underpinning operations and processes</td>
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<tr>
<td>Summer Term 2014</td>
<td>Consult on principles of proposals and seek approval of Integrated Student Pathway through appropriate governance routes</td>
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<tr>
<td>Summer Term 2014 (and through Summer)</td>
<td>Incorporate necessary updated references to feedback and complaints routes in 2014/2015 handbooks, student guides (hard copy where still possible and online) and communicate developments to those most likely to be signposting or providing advice and guidance to students</td>
</tr>
<tr>
<td>March through December 2014 (ongoing)</td>
<td>Consideration and piloting of additional early resolution strategies, particularly mediation.</td>
</tr>
<tr>
<td>June to August 2014</td>
<td>Ensure appropriate dovetailing of the Student Academic Appeals process and the Student Complaints Resolution process, and publish clear information to students as to the purpose of the two different processes</td>
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<tr>
<td>September 2014</td>
<td>‘Go Live’ with Central Website including information and guidance on the revised Integrated Student Pathway inclusive of the Formal Student Complaint Form</td>
</tr>
<tr>
<td>Now through Spring term 2014</td>
<td>Ongoing implementation and development with programme of briefing and training on good practice complaints resolution, mediation and the new integrated pathway</td>
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Suggested summary text for student publications and handbooks that can be adapted to fit the diverse local departmental contexts is available on [www.warwick.ac.uk/go/governance/complaintsandfeedback/frameworkconsultation/](http://www.warwick.ac.uk/go/governance/complaintsandfeedback/frameworkconsultation/), the a project to provide relevant web information and cross-referencing across the University’s webpages will be pursued over the summer 2014.

The above summary timetable is underpinned by a more detailed project timetable and associated action and communication plans being developed by the Student Complaints Co-ordination Group.

Any comments, queries or questions can be forwarded to complaints@warwick.ac.uk

11 June 2014