



## **021. Student Complaints and Procedure**

**Policy**

# Student Complaints Procedure

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## A. IFG Student Complaints Policy

### 1. Introduction

IFG is dedicated to ensuring all students receive a high quality experience and that they are treated in a fair and reasonable way. However, there will be occasions when a student may want to raise issues of concern or complaint. The following procedure is designed to enable students to do this.

This Student Complaints procedure described here sets out the formal processes which must be followed where a student (or group of students) wishes to make a complaint. A complaint can be submitted about acts or omissions of the College which took place at a time when the complainant (or group of complainants) was a student of the College, including those who were on temporary withdrawal at the time of the act or omission. Graduates have recourse to the complaints procedure for up to two months following the publication of their final grades. Guidance for students wishing to make a formal complaint can be found on the Student Complaints webpages

Most issues of complaint can be resolved without resorting to submitting a formal complaint. In many cases issues or concerns can be resolved via an informal discussion with the student's tutor or the appropriate member of staff, but if the matter is unresolved the issues can be escalated under the formal stage of the Student Complaints Procedure.

This Student Complaints Procedure is designed in accordance with the [OIA's Good Practice Framework](#). The principles of the Good Practice Framework is that procedures are:

- Accessible and clear
- Fair, independent and confidential
- Inclusive
- Flexible, proportionate and timely

and that they

- improve the student experience

## 2. Principles: fairness, bias, reasonable adjustments

- IFG will investigate complaints in line with the rules of procedural fairness and the principles set out in the OIA's Good Practice Framework.
- Decision makers will consider issues without bias; they will not have been previously involved in making decisions about the specific matters complained about, and they will give reasons for their decisions.
- Decision makers will be allowed to reach their decisions without undue or inappropriate influence or pressure from other individuals.
- IFG will apply reasonable adjustments to these procedures where possible, when it is reasonable to do so to prevent any student from suffering a substantial disadvantage as a result of a disability. Those requiring reasonable adjustments are expected to inform staff they are in contact with about this procedure for a discussion about what adjustments might be necessary and reasonable.

## 3. Scope of this procedure

This Student Complaints Procedure covers the following types of complaint:

- **Academic Complaint** – this is the expression of a specific concern about the provision of a course, programme or related academic service. (e.g. tuition, supervision, organisation or management of the course)
- **General Complaint** – this broadly covers any concerns pertaining to a student's non-academic experience at IFG.
- **Complaints about harassment/sexual misconduct** - to ensure that students are facilitated to raise such issues with IFG, students can use this procedure to make a complaint about harassment, sexual misconduct and/or other unacceptable behaviours but such issues may as necessary be referred into other procedures (such as the procedures under the Sexual Misconduct and Harassment Policy and Procedure, or the Non-Academic Misconduct Procedure) in order that they can be dealt with appropriately. Where this occurs, the Student Complaints Procedure will normally be placed on pause whilst other procedures are conducted instead, or terminated where matters are wholly referred for resolution under other procedures.
- **Complaints that lawful Freedom of Speech has been restricted** – the procedures under this Policy can be used to raise a complaint of this nature but such complaints will normally be referred into the Freedom of Speech Complaints Procedure to be investigated and dealt with. Where a complaint is made under this Policy and Procedure comprising several different issues including that lawful freedom of speech has been restricted, IFG may separate out those issues and refer such allegations them into the Freedom of Speech Complaints Procedure, or they may be considered under this Policy and Procedure together with the rest of the complaint.
- **Complaints about staff** - these may as necessary be referred under IFG's HR procedures

This Student Complaints Procedure does not cover the following types of complaint:

- **Academic Appeal** – this is a request for a review of a decision about student progression, assessment and awards. For these issues, the Academic Appeals Procedure should be followed.
  - Where a student lodges an academic complaint that, on review by IFG, is determined to fall within the scope of an academic appeal, IFG will normally refer that complaint into the Academic Appeals procedure. This may mean IFG's consideration of the case is deferred until such time as the Academic Appeals procedure is normally applicable.

- Where a student lodges an academic complaint that is found by IFG to be justified/partly justified and IFG finds the appropriate resolution would require the setting aside of an academic result or decision already made and approved by an Examination Board, the complaint may either:
  - be referred and fast-tracked into the later stages of the Academic Appeals procedure, or
  - IFG may call for Chair's Action by the Chair of the Examination Board to set aside the original result. In such an instance, the work will be remarked and then ratified at the next available Examination Board.

#### **4. Advice and guidance on making a complaint**

If a student is unsure who to raise a concern with in order to resolve the problem, advice can be sought from Student Support staff. Students are encouraged to seek guidance both before and during the use of this procedure from staff at IFG, such as tutors, Programme Leaders or Student Support staff.

As IFG is a small organisation, if there is any possibility of a conflict of interest between the person from whom the student seeks guidance and individuals involved in investigating the complaint, all parties will be informed appropriately and IFG will ensure alternative arrangements are in place to resolve this issue.

#### **5. Anonymous complaints**

IFG will review all anonymous complaints received, however there is a strong likelihood that we will not be able to take any action as we have a duty to deal with allegations in a fair and reasonable way, in accordance with the principles of natural justice. Natural justice means:

- decision makers must come to matters without bias or a reasonable perception of bias;
- each party must have a fair hearing;
- the process must be completed without delay;
- and decision makers must make reasonable decisions and give reasons for those decisions.

If we receive an anonymous complaint, whilst we are unlikely to be able to investigate or act on it, IFG will always consider whether or not any action can and should reasonably be taken.

#### **6. Vexatious, frivolous or malicious complaints**

IFG accepts that students may have valid concerns for which these procedures should be used. However, where IFG determines that a complaint has been made without foundation (frivolous), or made in bad faith (vexatious and/or malicious) will normally result in IFG terminating the consideration of the complaint and these procedures. Examples of vexatious, frivolous or malicious complaints include, but are not limited to:

- complaints that are obsessive or repetitive in nature
- complaints that are harassing of complaint investigators
- insistence on pursuing complaints in an unreasonable manner
- insistence on pursuing complaints that have no merit
- insistence on pursuing unreasonable and/or unrealistic outcomes
- complaints which are designed to cause disruption and/or annoyance
- demands for compensation or redress which lack any serious purpose or value
- 'counter-complaints' in response to allegations where, on the balance of probabilities, those counter-complaints would otherwise not have been made

## 7. Burden of proof

All decisions and findings reached at any stage of this Student Complaints Procedure are made on the balance of probabilities. The balance of probabilities means that any decision-maker in these procedures (e.g. the Stage Two Complaint Investigator) must be satisfied that on the basis of the evidence considered whether a reported issue has more likely than not occurred, in order to determine whether there is sufficient justification to uphold or partly uphold the complaint. In reaching such decisions, decision makers will take into account whether it is more likely than not that any reported events occurred as has been reported.

## 8. Timescales

IFG will follow the timescales and procedures set out in this Policy. We will normally complete all complaints within 90 days of the date of receipt of a formal complaint. However, there may be circumstances when the complaint may unavoidably take longer than would normally be expected (e.g. if other procedures place this procedure temporarily on pause).

IFG will ensure that students are kept informed in the event of any delay and receive regular updates so that they are aware we are still dealing with their complaint even where we have no further news at that time.

## 9. Stage 2 Formal Complaints or Stage 3 Requests for Review that are submitted late

### *Late Stage 2 Complaints*

Stage 2 Formal Complaints should normally be submitted within 2 months of the date that the issue(s) of complaint first arose, even where the Complainant has been endeavouring to resolve the complaint issue(s) informally. Where a formal Stage 2 Complaint is submitted more than 2 months after the date the issues first arose, this will normally be deemed to be a late complaint and thus ineligible for consideration at Stage 2. However, where a late Stage 2 Complaint is submitted and the Complainant has been endeavouring to resolve the complaint informally with IFG, the Academic Director will normally accept the complaint for consideration and appoint a Stage 2 Complaint Investigator.

In exceptional circumstances, the Academic Director will exercise their discretion and may determine that a late complaint should nonetheless be accepted for consideration. However, late complaints made under this Policy that fall within the scope of the Policy on Sexual Misconduct, Harassment and Unacceptable Behaviours will normally be accepted and redirected into the disclosure management procedures under that Policy to be investigated.

### *Late Stage 3 Requests for Review*

Stage 3 Requests for Review should be submitted within 14 calendar days of the date of the Stage 2 Formal Complaint Outcome Letter. Stage 3 Requests for Review received after this deadline will normally be deemed to be late and will not be accepted for consideration. In this event, IFG will issue a CoP Letter to the Complainant (see Section 15 of this document 'The Office of the Independent Adjudicator and Completion of Procedures').

In exceptional circumstances, the Executive Director may exercise their discretion and accept a late Stage 3 Request for Review if they are satisfied that the case warrants this discretion.

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On the next pages of this document you can find the full Student Complaints Procedure.

## B. IFG Student Complaints Procedure

### 10. The Student Complaints Procedure

The Student Complaints Procedure is a three stage procedure:

- **Stage 1: Informal Stage**
- **Stage 2: Formal Stage**
- **Stage 3: Request for Review**

#### ***Group complaints***

Where a group of students wishes to make a formal complaint, the group should nominate a 'Lead Student' with whom IFG will liaise regarding the complaint, and who will be responsible for submitting the Student Complaint Form to IFG. The Lead Student is responsible for also ensuring that the Student Complaint Form is fully completed, that all students involved in making the complaint are clearly listed, and that the content has been agreed by all students involved in raising the Group Complaint.

When a Group Complaint is received, whilst IFG will liaise with the Lead Student throughout the course of the Stage 2 procedure during the investigation of the complaint, and similarly during the Stage 3 Request for Review procedures, the Stage 2 Investigator or Stage 3 Reviewer will send the relevant stage outcome letter to all students involved in the complaint.

### 11. Stage 1: Informal Stage

Students are expected to try to use this informal stage of the procedure before progressing to the formal stage (Stage 2 of the Student Complaints Procedure). If, after attempting to resolve the issue informally the student is not satisfied, the issues can be escalated under the Stage 2 (the formal stage) of the Student Complaints Procedure.

#### ***Stage 1 procedure***

At Stage 1, the student should attempt an informal discussion with the student's tutor or the appropriate member of staff. Any resolution and/or agreements reached are likely to be done so in person/verbally, but the member of staff should normally follow up via email to confirm this and inform the student of their right to progress to Stage 2 of the Student Complaints Procedure if they are not satisfied.

Where the student does not want to, or cannot, raise a concern, or it has not been possible to resolve the matter via the informal approach, a formal complaint should be raised under Stage 2 of this Procedure.

### 12. Stage 2: Formal Stage

All Stage 2 formal complaints should be submitted using the Student Complaint Form, to the Academic Director who will either act as the Stage 2 Complaint Investigator or will nominate another member of staff to act as the Stage 2 Complaint Investigator. The student submitting the complaint will be referred to as 'the Complainant'.

A Stage 2 formal complaint should be submitted normally no later than 2 months after the issues of complaint first arising, in order to give the best opportunity for matters to be investigated as fully as possible.

#### ***Stage 2 procedure***

- The Stage 2 procedure will normally be completed within 21 calendar days of the date that the Stage 2 Complaint Investigator receives the completed Stage 2 Student Complaint Form.

## **Stage 2 Investigation**

- On receipt of the complaint, the Stage 2 Complaint Investigator will review the information submitted. They may request further evidence/information from the Complainant. They may, if they deem it necessary, interview the Complainant and/or any other parties as necessary in order to gather sufficient information to reach a decision regarding whether there are grounds that establish the complaint is justified, partly justified, or not justified.
- On completion of the Stage 2 Investigation, the Stage 2 Investigator will write to the Complainant with a Stage 2 Complaint Outcome Letter, setting out the following:
  - The issue(s) of complaint considered
  - What information and evidence was submitted by the Complainant
  - What information was requested and received/not received
  - Whether each issue of complaint is found, on the balance of probabilities, to be justified, partly justified or not justified
  - The overall outcome of the complaint (where there are multiple issues justified or partly justified ones alongside issues that are not justified, this will inform the overall outcome of the complaint as 'partly justified'.)
  - The Complainant's right to request a review of the Stage 2 Outcome under Stage 3 of the Student Complaints Procedure

## ***Incomplete Stage 2 Student Complaint Forms***

- If the form is incomplete, the Stage 2 Complaint Investigator will assess whether the complaint investigation can commence or whether more information is required before it can begin.
- If they determine that the form needs further completion by the Complainant, the Stage 2 Investigator will write to the Complainant setting out which sections of the Student Complaint Form need completing, together with any other information/evidence, and will state a deadline by which this information should be received.
- If they determine that more information is required, the 21 day timescale will restart from the date that the completed Student Complaint Form/further information is received by the Stage 2 Complaint Investigator. In the event that no completed form and/or no further information is received by the stated deadline for submitting it, the 21 day timescale will commence from that date.
- If, having requested it, a completed form is not received within the timeframe, the Stage 2 Complaint Investigator will determine whether they can proceed with the investigation. They may determine that there is insufficient information/evidence to commence their investigation, in which case they may terminate consideration of the complaint, giving their considerations and reasons for terminating it.

## **13. Stage 3: Request for Review**

Stage 3 of the Student Complaints Procedure allows complainants to request a review of the Stage 2 outcome, including a review of either or both of the Stage 2 Investigator's decision(s) and/or finding(s). A request for a review is not a request to automatically overturn the Stage 2 decision and/or findings; rather, it is a request for the Stage 2 decision and/or findings to be looked at again. There must be a basis for IFG to review the Stage 2 decision and/or findings, therefore specific grounds must be met to warrant a review.

## ***Individual Complaints at Stage 3***

For individual complaints, a request for a review should be made using the Form Stage 3: Request for Review of a Stage 2 Complaint Outcome.

### **Group Complaints at Stage 3**

For Group complaints, a request for a review should be made using the Form Stage 3: Request for Review of a Stage 2 Group Complaint Outcome (GROUP COMPLAINT FORM).

Whether it is made on an individual or group basis, a Stage 3 submission should contain the following:

- A fully completed Stage 3: Request for Review of a Stage 2 Complaint Outcome Form
- A copy of the Stage 2 Outcome Letter
- A copy of the original submitted Stage 2 Complaint Form
- Any new evidence that the Complainant wishes to submit, which was not considered with the original Stage 2 Complaint

A Complainant will not normally be required to resubmit supporting evidence that was already submitted with the Stage 2 Complaint, unless this is expressly requested by the Stage 3 Reviewer when they come to consider the Stage 3 Request for Review. However, a Complainant may include or draw attention to any evidence that was submitted with the Stage 2 Complaint, as part of their Stage 3 submission, if they believe this to be material to their Request for a Review.

A Request for a Review can be made under one or more of the following grounds:

- i) that there is new evidence that could not have been, or for good reason was not, made available at the time of the investigation of the Stage 2 complaint, and that there is sufficient evidence that the complaint warrants further consideration;
- ii) that evidence can be produced of significant procedural error in the investigation of the Stage 2 complaint, including allegations of prejudice or bias, and that there is sufficient evidence that the complaint warrants further consideration.
- iii) that the Stage 2 Outcome is unfair and/or has or will likely have a disproportionate impact on the Complainant.

Stage 3 will normally be conducted by the Executive Director or their nominee as the Stage 3 Complaint Reviewer. They will consider whether, on the balance of probabilities, any of the grounds have been met. If so, they may order one of the following:

- a. That the original Stage 2 Complaint decision and/or findings should be partly amended
- b. That the original Stage 2 Complaint decision and findings should be overturned and replaced with an entirely new decision/outcome
- c. That notwithstanding that the grounds have been met, there is insufficient justification to amend or overturn the original Stage 2 Complaint decision and findings

### ***Exceptional ground for review***

Where the Complaint Reviewer finds that neither of the grounds have been met but is satisfied that there are other considerations which in their view warrant a revised complaint decision and outcome (for example, if a Stage 2 Complaint Outcome has imposed or will impose an unintended avoidable disadvantage on the Complainant), they may exceptionally exercise their discretion to either:

- a. amend part of the original Stage 2 Complaint decision and/or outcome
- b. overturn the original Stage 2 Complaint decision/outcome and replace it with an entirely new decision/outcome.

### ***Timescales for a Stage 3 Request for Review***

A Stage 3 Request for review should be submitted via email by the Complainant to the Executive Director within 14 calendar days of the Stage 2 Complaint Outcome Letter.

The Executive Director's Stage 3 Complaint Review Outcome letter will normally be completed within 21 calendar days of the date of receipt of the Stage 3 Request for Review submitted by the Complainant.

### **14. Academic complaints - right of final appeal**

In the event of academic complaints, the Complainant will be informed of their right to make a final appeal to the Accreditation Service for International Colleges (ASIC), the accreditation body for IFG, together with instructions on how to do this.

### **15. The Office of the Independent Adjudicator and Completion of Procedures**

The Office of the Independent Adjudicator for Higher Education (OIA) runs an independent scheme to review student complaints. IFG is a member of this scheme. If a student is unhappy with the outcome, you may be able to ask the OIA to review your case. You can find more information about making a complaint to the OIA, what it can and can't look at and what it can do to put things right if something has gone wrong here:

<https://www.oliahe.org.uk/students>.

Students normally need to have completed Stage 3 of this Student Complaints Procedure before they can complain to the OIA. At the end of the procedure, IFG will issue the Complainant with a letter called a "Completion of Procedures Letter" where there are no further steps that the Complainant can take internally.

If the complaint is not upheld, IFG will issue a Completion of Procedures Letter automatically. If the complaint is justified or partly justified, the Complainant will be informed that they can request a Completion of Procedures Letter if they want one. More information about Completion of Procedures Letters can be found here:

<https://www.oliahe.org.uk/providers/completion-of-procedures-letters>.

Students must make their complaint to the OIA within 12 months of completing this procedure. The 12 month period will normally run from the date of the Completion of Procedures Letter.

#### ***IFG Completion of Procedures Letter (CoP Letter)***

The Completion of Procedures Letter issued by IFG will include:

- A summary of the complaint or appeal the student has made to IFG;
- The title and year/version of the regulations/procedures that were applied;
- A summary of the issues considered at the final stage of the internal procedures;
- The final decision taken by IFG;
- The reasons for that decision;
- Information about the role of the OIA;
- The deadline for bringing a complaint to the OIA.

IFG may, where relevant, include a summary of issues which were raised but not pursued by the Complainant, to identify any issues that have not completed its internal procedures.

The COP Letter will also draw the student's attention to any factors which IFG is aware of that mean that it is particularly important for the student to bring the complaint promptly to the OIA. Examples of such factors are:

- The student is subject to deadlines for completing the course;
- The course or module the student is studying is being discontinued, or the programme is in teach out;
- The remedy the student is seeking will be impossible to implement after a certain date;
- The student has indicated that they intend to bring judicial review proceedings against the provider if they are dissatisfied with the outcome of the OIA's review.

## Appendix A: Completion of Procedures Letter Template

Please note - the format will be adjusted to meet the individual circumstances of a student case provided that the key points below are included.

Dear [Name of complainant],

### Completion of Procedures Letter

This letter confirms that the internal procedures of IFG in relation to your *complaint / appeal etc\** regarding [describe the stage of the respective procedures the case was submitted under, processed under, and final stage that the case reached] have been completed.

The issues that you raised in your *complaint / appeal etc\** were [provide headline overview of case (bullet points will do)]

The issue(s) that were considered in relation to your *complaint / appeal etc was / were\**: [brief summary of the complaint etc NB not every issue raised by a student in a case will have been considered by the institution (some may not have been eligible for consideration etc) so this is why they ask for this information. In some cases, this section and the one above will be identical, and this is fine.].

The final decision of IFG is\* [detail of decision] because [reasons].

The procedures / regulations applied were\*: [list the policies and procedures that were applied to this student's case. Ensure that the name of the policy/ies and dates you are listing are the same as those provided to the OIA's electronic Regulations Bank in the annual procedural return made early in Jan/Feb every year.].

IFG subscribes to the OIA's independent scheme for the review of student complaints. If you are dissatisfied with the outcome you may be able to apply for a review of *your complaint / appeal etc\** to the Office of the Independent Adjudicator for Higher Education (OIA) provided that the complaint you take to the OIA is eligible under its Rules, and submitted within the requisite 12 month timeframe.

Should you decide to make a complaint to the OIA, your OIA Complaint Form **must be received by the OIA within 12 months** of the date of this letter, that is, it must be received by the OIA **on or before** [insert date - e.g. if the Completion of Procedures Letter is dated 9 January 2026, this date should be 9 January 2027].

[Include here any factors of which IFG is aware which mean that it is particularly important for the student to bring the complaint promptly.]

You can fill in the OIA's complaint form online or download a copy from the OIA website.

<https://www.oliahe.org.uk/students/how-to-complain-to-us/>. The OIA also publishes *An Introduction to the OIA Scheme for Students*, which can be downloaded from <https://www.oliahe.org.uk/students/can-you->

[complain-to-us/](#). Alternatively, you can telephone or write to the OIA for a form. **You should send a copy of this letter [ optional - and our final decision] to the OIA with your OIA Complaint Form.**

Guidance on submitting a complaint to the OIA and the OIA Complaint Form can also be found on the OIA's website <https://www.oliahe.org.uk/students/how-to-complain-to-us/>. You may also wish to seek advice from [XX] about taking your complaint to the OIA.

Please note that the OIA will normally only review issues that have been dealt with through our internal procedures.

Yours sincerely,

[Name and Role of authorised signatory]