

Policy & Procedure	Complaints Handling
Policy Area	Quality
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Responsible Senior Manager	Assistant Principal Performance and Skills

History of Amendments

Date	Version/Pages/Sections Affected	Summary of changes
October 2014	Version 01	Updated paper version of Complaints Form included as Appendix 2.
November 2014	Version 01	Minor amendments made to the complaints form to include clarity of process for submitting a paper version of the complaints form.
October 2015	Version updated to 02	<p>Clarity on role of Student Association sabbatical posts in dealing with complaints – section 1.5.</p> <p>Removal of Appendix 2 from document.</p> <p>Signposting of access to paper PDF forms in section 3.</p> <p>Sub sections numbering added in to document.</p> <p>Amendments following staff representatives suggestions:</p> <ul style="list-style-type: none"> -Policy statement amendment to text - Page 8 Insert point 1.6 - Page 9 point 2.2 amended text - Page 12 Insert text on vexatious complaints point 2.6 <p>Insertion of a complaints handling questionnaire in Appendix 2</p> <p>Minor amendments as follows:</p> <p>2.2 Anonymous complaints dealt with in line with their significance</p> <p>2.6. Reference to raising student awareness and implications of the complaints process through induction and the student handbook.</p> <p>Section 6 First two bullet points inserted</p>
June 2017	Version 02	<p>Pages 4 to 6: minor revisions to text</p> <p>2.1 Clarification on role of DQLT</p> <p>2.2 Revised to reflect current practice</p> <p>3.2 Inserted to reflect AB guidance</p> <p>3.4 Minor revisions re DPA aspects.</p> <p>4.1 Revised guidance now reflects current practice</p> <p>Page 18 – Guidance re “Extensions” revised to reflect current practice</p>

		5 Minor revisions to narrative 6 Guidance revised to reflect current practice 8 Section included to reflect guidance from AB Include Flowchart
August 2019	Version 03	Guidance when complainant replies to formal decision

Policy Statement

This policy and procedure supports West College Scotland’s commitment to provide high quality learning experiences and services. The College recognises that such provision may, from time to time, fall below the standards expected. In such instances, feedback is a valuable resource which will provide us with information from which we can learn lessons, make changes and continually improve the quality of our services. At all stages in the complaints process the College and its representatives will adhere to this policy and will operate within the framework of all current legislation including Freedom of Information and Data Protection legislation in Scotland. This document incorporates a Complaints Handling Procedure which details our complaints process. This policy and procedure is designed to enable anyone interacting with the College to raise matters of concern to our attention and to enable investigation of those concerns, to achieve a satisfactory conclusion.

Equality Statement

The College is committed to providing equal opportunities to ensure its students, staff, customers and visitors are treated equally regardless of gender reassignment, race, religion or belief; disability; age; marriage and civil partnerships; pregnancy and maternity; sexual orientation; sex.

Please note this document is available in other formats, to request another format please email quality@wcs.ac.uk

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Foreword

West College Scotland's complaints handling procedure (CHP) has been developed with reference to the model procedure published by the Scottish Public Services Ombudsman (SPSO). The definitions, principles, timescales and information contained in this complaints handling procedure (CHP) have been based on and/or adapted from the SPSO guidance.

Our complaints handling procedure seeks to offer a prompt frontline resolution of a complaint and where this is not possible we will conduct a thorough, impartial and fair investigation of complaints so that we can make evidence-based decisions on the facts of a case. The CHP helps us to resolve complaints successfully at the first time of asking.

Our aim is get things right first time and therefore we value student and other stakeholder comments and suggestions. We have devised an extensive range of student focused consultation and feedback mechanisms to help us improve our levels of service and the wider student experience. We do recognise that, on occasion, our service may fall short of expectations and we value any complaints we receive as a learning tool for organisation wide evaluation and development.

This CHP is available externally via the West College Scotland website www.westcollegescotland.ac.uk; internally via the Student Intranet, the college Virtual Learning Environment (Moodle); and in hard copy and alternative formats on request to Quality@wcs.ac.uk or by telephone on 0300 600 60 60.

Our leaflet 'West College Scotland – How to make a complaint' explains the College's complaints handling procedure. This leaflet is also available on the College website, and in all campuses at Reception, in the Library and in Student Advisory Areas. The leaflet is available in alternative formats on request to quality@wcs.ac.uk.

The College complaints handling procedure informs all complainants of their right to appeal to the SPSO.

This complaints handling procedure will help us do our job better by improving our services, improve relationships with our students and other stakeholders and preserve and enhance the College's reputation. It will help us to ensure that the student learning experience, and the experience of other stakeholders in their interactions with the College, is the best it can be.

Liz Connolly

Principal & Chief Executive

1. Scope

This policy may be used by students, customers, visitors, partners and stakeholders of West College Scotland. It covers any valid expression of dissatisfaction about standards of service, courses or facilities of the College, and the actions or lack of actions by the College or its representatives. The policy does not apply to matters covered by separate policies or procedures including, but not limited to, academic appeals, disciplinary issues, or student funding awards.

2. Who deals with complaints?

2.1. The Directorate of Quality, Learning and Teaching

The Director Quality, Learning and Teaching ensures the overall implementation and effectiveness of the college Policy and Procedure for Handling Complaints by:

- Ensuring complaint outcomes, trends and actions are shared with the College Senior Management Team, and the Learning, Teaching and Quality Committee
- Ensuring that learning from the nature and outcomes of complaints is used across the whole organisation as a means to effect positive improvements in the levels of service provided by the College
- Ensuring the complaints annual report is accurate and is published timeously on the College website

2.2. The Head of Quality and Professional Standards

- monitors, reviews and reports on the operational co-ordination of complaints across the college
- approves and assigns investigators for complaints which escalate to Stage 2
- oversees the quality of recording, response and resolution offered to complainants
- prepares reports and analyses complaint trends, outcomes and actions on a quarterly basis; ensures that all staff involved in the complaints process receive training and updates as deemed appropriate for their role reports on, and evaluates, the CHP and its effectiveness across all departments.

2.3. All staff

- All members of staff should timeously deal with complaints which can be resolved in a straightforward manner. Staff will ensure that frontline resolution of complaints is dealt with in a courteous, professional and unbiased manner. Confidentiality will be maintained and complainants will not be discriminated against, nor fear retribution from, complaining;
- Employees who are the subject of the complaint or have a clear conflict of interest in the matter cannot deal with that complaint, in which case the complaint must be passed to a senior manager for consideration;
- Employees who deal with a complaint by offering a frontline resolution must ensure that details of the complaint are promptly reported to the Quality Standards Co-ordinator, who will log the detail and resolution of the complaint.

2.4. Complaints Handlers (campus based Quality Standards Co-ordinators)

- Will review and record details of the complaint and its resolution on the college complaints handling system;
- Monitor the complaints recording database on a regular basis;
- Liaise with the Head of Quality and Professional Standards on allocation of an investigator, where this is deemed the appropriate course of action;
- Ensure that timelines are monitored and that customers are kept informed of the progress of their complaint;
- Will issue, and collate responses from, the College post complaints questionnaire.

2.5. Investigators

- Senior managers (Heads of Sector and Heads of Support areas) are assigned complaints for investigation. An investigator cannot investigate a complaint where they are the subject of the complaint or have a conflict of interest in the matter.
- Investigating Managers upon completion of the investigation send their findings to the HQPS.

- The Investigating Manager should ensure all relevant documentation relating to the complaint is sent to Quality Department.

2.6. Senior Management Team

- Review complaints on a quarterly basis
- Evaluate the effectiveness of the CHP on an annual basis
- Evaluate the impact of lessons learned from stakeholder complaints on an annual basis

2.7. Student Association

- Student Association Presidents and elected Office Bearers are in direct contact with students and may be privy to complaints or other issues which directly affect the student experience. We recognise the importance of this interaction and that we can learn from any such expressions of dissatisfaction. Any complaints which are directed to the Student Association or its elected Office Bearers will be immediately passed to the Complaints Handlers on each campus.
- The Assistant Principal Performance and Skills will meet with Student Association representatives and jointly review student complaints, prior to each quarterly reporting cycle.
- All Student Association Office Bearers will be updated annually on the college CHP.
- The Student President will act as an advocate on behalf of a student by supporting the completion/submission of the complaint form to the Quality Office. SA sabbatical officers will not be involved in resolving complaints on behalf of the college, nor will they broker a resolution – they are active only in a capacity to support student complainers through the process.
- The SA sabbatical officers do not sign off complaints. The Assistant Principal Performance and Skills and Head of Quality and Professional Standards are responsible for this action.

2.8. Representation

Staff Representative Groups/Trades Unions play an important role in promoting a shared understanding of the procedure for dealing with candidate and college malpractice across their members. These groups also have a role in supporting and representing staff members involved in a complaints investigation.

3. Complaints: General Information

3.1. What is a complaint?

West College Scotland's definition of a complaint is:

'An expression of dissatisfaction by one or more stakeholders about an action or lack of action or about the standard of service provided by the College or on its behalf.'

For example, a complaint may relate to:

- our failure to provide a service
- an inadequate standard of service
- the admissions process
- dissatisfaction with our policies and/or procedures
- the quantity and availability of learning resources
- treatment by or attitude of a member of staff
- disagreement with a decision where the customer cannot use another procedure (for example an appeal) to resolve the matter
- our failure to follow the appropriate administrative process

This list is not exhaustive and there may be other reasons for complaints which are not included above. The college will regularly publish, on its website, examples of complaints we receive and how we have handled them.

A complaint is **not**:

- a routine first-time request for a service;

- a request for information or an explanation of a policy or practice;
- an issue that is in court or has already been heard by a court or a tribunal;
- a disagreement with a decision where a right of appeal exists, for example, an academic appeal is handled through the college Procedure for Academic Appeals;
- an attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision;
- a Freedom of Information or Data Protection Act request – these should be made in writing and will be duly considered on individual merit. Full details of how to make such requests can be found on the college website;
- a claim for compensation from the college (this should be made in writing to the College Principal);
- an appeal against a student funding, finance or bursary award – contact directly the college Finance department, situated in each campus, for current information on how to appeal;
- an external examination result – you should direct your initial queries to the curriculum department responsible for your course.

3.2. Submission Time-scale

- Complaints should be submitted as soon as possible.
- We will not consider complaints where 12 months or more have elapsed since the issue of concern occurred.

3.3. Anonymous Complaints

We value all valid complaints, including anonymous complaints which we will consider fully in deciding whether or not it is appropriate to take further action, and what that action should be. Examples of anonymous complaints which we will investigate further would relate to serious allegations which may damage the reputation of the College should they be dismissed without review. Decisions made on what action we take in furtherance of an anonymous complaint will be authorised by a senior manager. We will record any actions taken in respect of

anonymous complaints including where we decide that no action is the appropriate outcome. Anonymous complaints will therefore be dealt with appropriate to the significance of the complaint. In all cases every effort will be made to ensure the anonymity of any staff involved is preserved, and at all times we will comply with data protection and confidentiality legislation.

3.4. What if the customer doesn't want to formally complain?

All expressions of dissatisfaction are regarded as a formal complaint and we will record these so that we can take the opportunity to improve services. We should encourage customers to submit their complaint and allow us to deal with it through the procedure. This will ensure they are updated on the action we take and get a timely response to their complaint. If, however, the customer insists they do not wish to complain, we will record the issue as an anonymous complaint. This will ensure that:

- a) we do not record their details on the complaints database
- b) we do not contact them again about the matter, and
- c) the complaints data we record is accurate and reflects feedback while enabling us to fully consider the matter and take corrective action where suitable.

3.5. Who can make a complaint?

Anyone who receives, requests or is affected by our services can make a complaint. Sometimes a customer may be unable or reluctant to make a complaint on their own. We will accept complaints brought by third parties on behalf of a student/service user. However, we will reply to the person identified in the complaint, unless written permission has been granted to allow communication with the third party. This means we will seek their approval in writing or via email and comply with data protection requirements at all times.

The college will support individuals or organisations wishing to complain about any aspect of its service. This is because we want to understand the nature of the complaint and how we might need to respond if a service is substandard or failing.

This may involve seeking external support, e.g. advocacy services, to help the customer.

3.6. Complaints involving more than one department or organisation

If a complaint relates to the actions of two or more college departments, we will:

- tell the complainant who will take the lead in dealing with the complaint, and
- explain that they will get only one response covering all issues raised.

If a customer complains to the college about the service of another body, but the college is not involved in the issue, we will advise the customer to contact the other body directly.

We will handle a complaint through this procedure if it directly relates to a college service and the service of another body, for example, a school or contractor providing a service on the college's behalf, a qualification awarding body or the provider of catering and cleaning services. If we need to make enquiries to an outside body about the complaint, we will always take account of data protection legislation.

3.7. Managing vexatious, malicious and/or unacceptable behaviour by complainants

We recognise that people may act out of character in times of trouble or distress and that occasionally the circumstances leading to a complaint may result in the customer acting in an unacceptable way. We define unacceptable behaviour as being aggressive behaviour, use of inappropriate language, persistence, threats or other offensive behaviour. Where a complainant exhibits vexatious, malicious and/or unacceptable behaviours we will:

- treat the complaint seriously and properly assess it;
- record the details of the complaint;
- apply our policies and procedures to protect our staff;
- restrict the complainant's access to staff and communicate this decision to the customer with notification of a right to appeal our actions;
- refer to the relevant authorities, for example police services, where necessary;

- advise the complainant that we may cease to correspond with them if the inappropriate behaviour continues. We will include advice on the duration of the sanction.
- use our college disciplinary procedures against vexatious, malicious and /or unacceptable behaviour where required.

Student guidance on the complaints handling procedure will be included as part of induction and referenced on the Student Intranet

4. The Complaints Handling Procedure

A customer can make a complaint in writing, in person, by telephone, by email or online, or by having someone complain on their behalf. We will always consider any valid and reasonable complaint, regardless of how it has been communicated to us. The college will ensure equality of access to a standardised Complaints Form. The college will make available guidance to complainants on how to make a complaint.

4.1. What happens when we receive a complaint?

When we receive a complaint we will:

1. Decide whether the issue can indeed be defined as a complaint. The customer may express dissatisfaction about more than one issue and this may mean we treat one element as a complaint, while directing the customer to pursue another element through an alternative route (see examples on Page 2 – what is not a complaint);
2. Record the details on our complaints handling system;
3. Decide whether or not the complaint is suitable for frontline resolution by establishing with the complainant exactly what they are complaining about, what they hope to achieve by complaining and if we can agree a desired outcome;
4. If we agree a front line resolution is appropriate, we will communicate this in an appropriate manner to the complainant including an offer of an apology where deemed the best resolution;

5. If the staff member receiving the complaint cannot resolve this at frontline details of the complaint will be passed to a colleague who can try to resolve it;
6. We will respond to the complainant by the preferred method indicated in the complaint submission. In the case of a preference for telephone communication, we will follow up by email, to ensure we have a record of the formal response and decision provided. We will keep a full and accurate record of the decision reached and passed to the customer;
7. Dependent upon the nature of the issues, some complaints will need to be fully investigated before we can give the customer a suitable response. We will escalate these complaints immediately to a Stage 2 investigation;
8. Where a customer does not agree to a frontline resolution we will immediately escalate the complaint to a Stage 2 investigation.

4.2. Our complaints process provides two opportunities to resolve complaints:

Stage 1: Frontline resolution, and/or

Stage 2: Investigations.

4.2.1. Stage 1: frontline resolution

Frontline resolution aims to quickly resolve straightforward customer complaints that require little or no investigation and refers to the first stage of the complaints process. Any member of staff may deal with complaints at this stage.

The main principle is to seek early resolution, resolving complaints at the earliest opportunity and as close to the point of service delivery as possible. This may mean a face-to-face discussion with the customer, or asking an appropriate member of staff to deal directly with the complaint. The complaint may be settled by providing an on-the-spot apology where appropriate, or explaining why the issue occurred and, where possible, what will be done to stop this happening again. We will work with complainants in managing their expectations of a realistic and achievable resolution.

We will also explain to the complainant that, as an organisation that values complaints, we may use the information given when we review service standards in the future.

Timelines for frontline resolution

We will always attempt in the first instance to resolve complaints at the frontline.

We will complete a frontline resolution within **five working days** or sooner where practicable.

Escalation of a complaint to a Stage 2 investigation

We will escalate a complaint to the investigation stage when:

- We have tried frontline resolution but the complainant remains dissatisfied and requests an investigation. This may happen immediately when we communicate the decision at the frontline stage, or sometime later;
- We have unsuccessfully attempted third party intervention, mediation and/or further explanation in an attempt to achieve a satisfactory resolution
- The customer refuses to take part in frontline resolution;
- The issues raised are complex and require detailed investigation;
- The complaint relates to serious, high-risk or high-profile issues.

High risk or high profile complaints

Some complaints may require particular action or raise critical issues that need senior management's direct input. Some examples may:

- involve a death or terminal illness
- involve serious service failure, for example major delays in providing, or repeated failures to provide, a service
- generate significant and on-going press interest
- pose a serious risk to the College's operations

- present issues of a highly sensitive nature, for example concerning a particularly vulnerable person or pose a child protection issue
- relate to a claim of discrimination, with due regard to protected characteristics as set out in current Equality or Data Protection legislation
- relate to a dereliction of duty by a college employee
- involve a claim of personal injury which has incapacitated the customer

4.2.2. Stage 2 Investigation

Complaints which require investigation are those which may already have been considered at the frontline resolution stage, or which have been identified from the start as needing immediate investigation.

Our investigation aims to establish all the facts relevant to the points made in the complaint and to give the customer a full, objective and proportionate response that represents our final position.

We will liaise with the complainant to ensure all parties are clear from the start of the investigation stage exactly what is being investigated.

Our Complaints Handlers may contact the complainant in person, by telephone, by email or by letter to discuss and confirm these points prior to commencement of the investigation. Such communication will aim to establish:

- What specifically is the customer's complaint or complaints?
- What does the customer want to achieve by complaining?
- Are the customer's expectations realistic and achievable?
- Agreement on any additional evidence that may be required to help us to conduct an investigation and reach a decision

Complaints Handlers will record all communication with a complainant on the complaints handling system at all stages in the complaints process.

Timelines for a Stage 2 investigation

Our Complaints Handlers will acknowledge Stage 2 complaints within **three working days**.

We will provide a full response to the complaint as soon as possible but not later than **20 working days** from the time we received the complaint for investigation.

Extensions to the Stage 2 investigations

Not all investigations will be completed within this deadline notably where they are so complex that they require careful consideration and detailed investigation beyond the 20-day limit. In exceptional circumstances, where we have clear and justifiable reasons for doing so we will extend the limit beyond 20 days.

We will set time limits on any extended investigation, and keep the complainant updated on the reason for the extension and confirm the new time limit agreed.

The reasons for an extension might include the following:

- Essential accounts or statements, crucial to establishing the circumstances of the case, are needed from staff, customers or others who are not available due to absence from work;
- When we cannot obtain further essential information within normal timescales;
- Where normal college operations are disrupted by unforeseen or unavoidable operational circumstances, for example industrial action or severe weather conditions;
- Where we have agreed with the complainant to enter in to a period of mediation as a potential route for resolution.

At all times we communicate with complainants to ensure their expectations of outcomes from a stage 2 investigation are realistic and achievable.

4.3. Mediation

Some complex complaints, or complaints where customers and other interested parties have become entrenched in their position, may require a different approach to resolving the complaint. Where appropriate, and with the agreement of the complainant we will consider using services such as mediation or conciliation using suitably trained and qualified mediators to try to resolve the matter and to reduce the risk of the complaint escalating further.

Where we agree mediation or other conciliatory services, new time lines will be agreed with the complainant.

Any member of staff who is the subject of a complaint may wish to seek support from their union officials.

4.4. Closing the complaint at the investigation stage

We will let the complainant know the outcome of the investigation, in writing or by their preferred method of contact.

Our response to the complaint will address all areas that we are responsible for and explain the reasons for our decision.

We will record the decision, and details of how it was communicated to the customer, on the system for recording complaints. We will also make clear to the customer:

- their right to ask SPSO to consider the complaint
- the time limit for doing so, and
- how to contact the SPSO

4.5. Independent external review

- On completion of the investigation stage we will inform all customers of their right to approach SPSO if they remain dissatisfied.
- Details of this service and how to contact SPSO are available in Appendix 1.
- The college leaflet 'West College Scotland – How to make a complaint' provides further details.

5. Recording

Complaints data is systematically recorded, reported and analysed as it provides valuable feedback on the services we offer and provides opportunities for evaluating the effectiveness of the services we provide.

From receipt to resolution of a complaint we will allocate a Complaints Reference identifier which will appear on all correspondence and records. We will retain a record of:

- the customer's name the date the complaint was received
- the nature of the complaint
- how the complaint was received
- the service the complaint refers to
- the date the complaint was closed
- action taken at the investigation stage (where appropriate)
- the outcome of each separate aspect of the complaint i.e. if the complaint was “Upheld” or “Not Upheld”
- the underlying cause of the complaint and any remedial action taken

An electronic recording system will be used by the Quality Department to record complaint details. Staff level of access to data recorded on this system will be limited to the Quality Standards Co-ordinators and HQPS, who will log all complaints on a campus basis and dependant and specific to the complaints handling role undertaken. Staff who have received and resolved a complaint at the frontline should contact the campus based Quality Standards Co-ordinator without delay and provide details of the complainant, the nature of the complaint, the agreed resolution and any other outcome.

6. Reporting, Learning and Publicising

Complaints data will be:

- depersonalised before publication
- confidentially stored electronically with restricted access to detail and in line with Data Protection legislation

- reported to the Senior Management Team quarterly, who will review key indicator data and action taken to address issues
- analysed for trends by the Quality, Learning and Teaching Directorate to ensure service failures are identified, communicated to appropriate service areas, and that action is taken and monitored
- incorporated systematically into the college self-evaluation activities
- published on the college website in line with SPSO requirements

7. Appeals to Awarding Bodies

- Under certain circumstances a complainant may have the right to appeal to the appropriate Awarding Body
- The Awarding Body will only consider an appeal where the complaint has exhausted all stages of the College's CHP.
- The Awarding Body will consider complaints in relation to:
 - Assessment, in the broadest sense, including the conduct of, preparation for and environment for assessment
 - Dissatisfaction with the way in which the College handled a complaint in respect of the conduct of, preparation for and environment for assessment
- The Awarding Body will not deal with complaints which are about:
 - Assessment decisions
 - complaints about the wider experience of being a student e.g. support services, student funding etc.

Students who are considering making a complaint an awarding body are advised, to contact the Campus Quality Standards Coordinator, in the first instance, wither in person or by email to Students undertaking regulated qualifications have the right to appeal to SQA Accreditation [or Ofqual] .and are advised to contact quality@wcs.ac.uk for support in this process.

8. Post Formal Decision Response

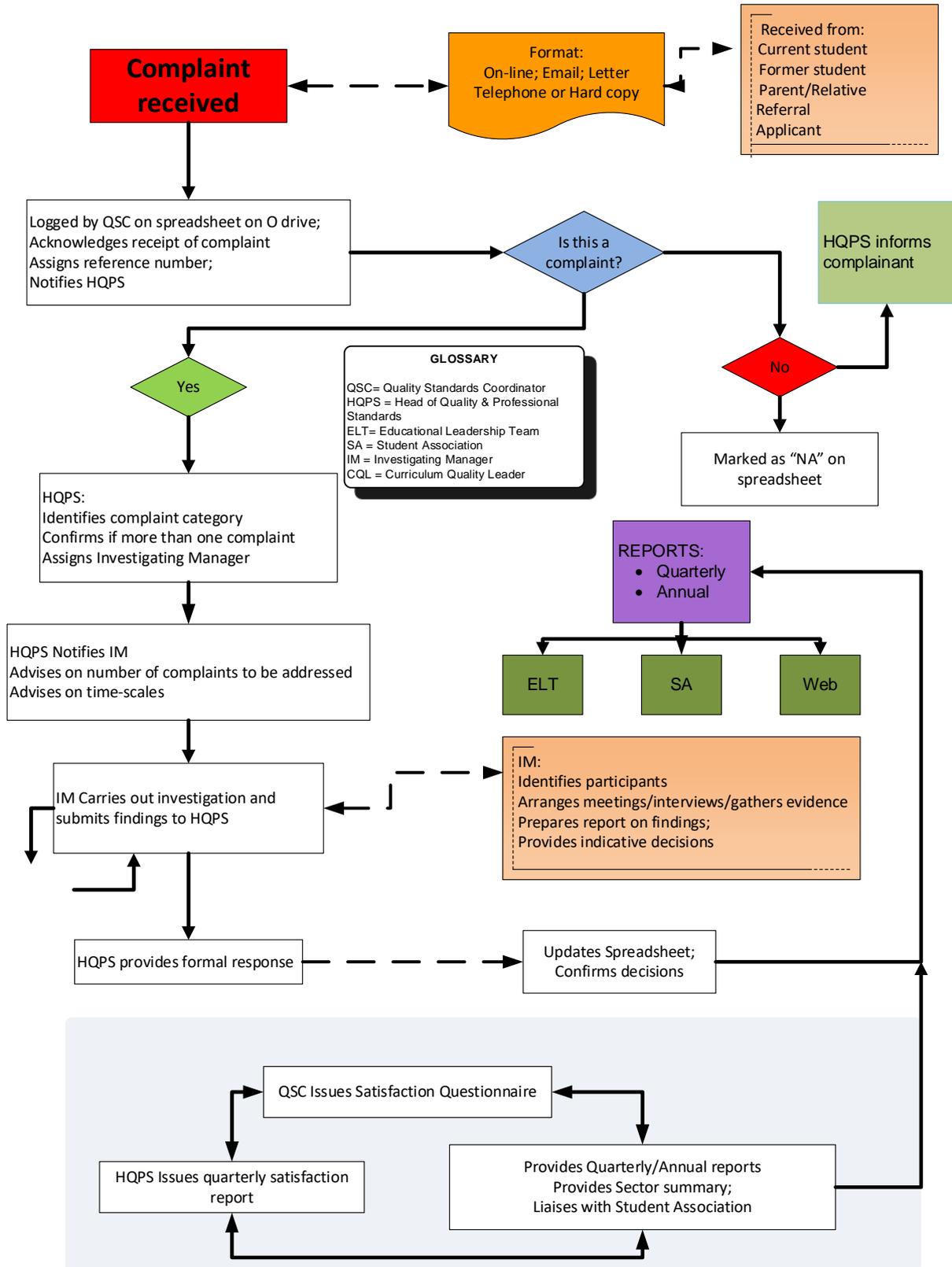
Complainants may provide a response to the formal decision. If this merely acknowledges receipt of the decision, then no further action should be taken.

If the complainant queries the decision, then they should be referred to the appeals process managed by the SPSO.

If the complainant queries the process used than a response should be considered. Depending on the nature of the query, this may need to be referred to the Investigating Manager for comment/clarification.

All post decision correspondence to the complainant should be coordinated by the HQPS

Complaints Handling Process Map



Appendix 1 - Information about the SPSO

The Scottish Public Services Ombudsman (SPSO) is the final stage for complaints about public services in Scotland. This includes complaints about the Scottish Government, NDPBs, agencies and other government sponsored organisations. If you remain dissatisfied with an organisation after its complaints process, you can ask the SPSO to look at your complaint. The SPSO cannot normally look at complaints:

- Where you have not gone all the way through the organisation's complaints handling procedure;
- More than 12 months after you became aware of the matter you want to complain about; or
- That have been or are being considered in court.

The SPSO's contact details are:

Freepost SPSO

Or

SPSO

Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

Freephone:	0800 377 7330
Online contact:	www.spsso.org.uk/contact-us
Website:	www.spsso.org.uk
Mobile site:	http://m.spsso.org.uk

Equality Impact Assessment

Name of policy/procedure/decision: Complaints Handling Procedure

Provide a brief summary of the aims of the policy/procedure/decision and main activities:

This Procedure seeks to offer a prompt frontline resolution of a complaint and where this is not possible, the College will conduct a thorough, impartial and fair investigation of complaints so that we can make evidence-based decisions on the facts of a case. The Procedure has been developed with reference to the model procedure published by the Scottish Public Services Ombudsman (SPSO).

Assessed By: Clare Fraser **Date:** 02 October 2019

This stage establishes whether a policy, procedure or decision will have a differential impact from an equality perspective on people who share protected characteristics or whether it is “equality neutral” (i.e. have no effect either positive or negative).

The protected characteristics are: age, disability, gender reassignment, pregnancy or maternity, race, religion or belief, sex and sexual orientation.

1. Who will benefit from this (students/staff/stakeholders)? Is there likely to be a positive impact on people who share protected characteristics, and if so, how? Or is it clear at this stage that it will be equality “neutral”? i.e. will not have a differential impact on any equality group/s?

The transparent and fair approach which is set out in this Procedure should have a neutral impact on protected groups. The promotion of the process could encourage protected groups to speak up when they feel that any unfair treatment is related to their protected characteristics. The focus on continuous improvement should enhance the services which are provided by the College, which could positively impact stakeholders.

2. Is there likely to be an adverse impact on people who share protected characteristics? If so, who may be affected and why? Or is it clear at this stage that it will be equality “neutral”?

The Procedure includes steps to mitigate against the risk of adverse treatment. The independence of the investigation should reduce the risk of bias. Staff who are involved in implementing this Procedure receive Equality and Diversity training, which emphasises the importance of meeting the diverse needs of stakeholders. The Procedure encourages support from unions and the Student Association, which should assist complainants in receiving support when it is necessary as a result of sharing protected characteristics.

3. What action will you take to ensure that you are monitoring the impact of this Procedure?

The College produces quarterly and annual reports on its complaints handling activities; the results of which are reviewed widely across the College [including the SMT and Board], and are published on our website. The College also makes specific reference to complaints handling in relation to the protected characteristics and this analysis is distributed to the Equality, Diversity and Inclusion Committee.