

# ITALIA CONTI

## Complaints Policy and Procedures

Version	2526-1.1
Prepared by:	Head of Quality Assurance
Reviewed by:	Head of Quality Assurance and Policy Steering Group
Approved by:	Policy Steering Group
Approval date:	17 <sup>th</sup> November 2025
Next review:	16 <sup>th</sup> November 2026

This policy will be reviewed annually by the Policy Steering Group.

The policy will be reviewed annually and updated earlier where required by legal, regulatory, funding, operational or governance changes, or by audit findings or lessons learned. Any material change must be approved by the Board.

## Table of Contents

1 Overview .....	3
2 Legislation .....	3
3 Purpose .....	3
4 Scope .....	4
5 Exclusions .....	4
6 Definitions .....	5
7 Core Principles.....	8
8 Allegations against members of staff .....	9
9 Timescales .....	10
10 Responsibilities and Management .....	11
11 Italia Conti FE and HE Student Complaints Procedure .....	12
11.1 Additional policy statement on student complaints.....	12
11.2 Procedure if a student has a legitimate complaint.....	13
Stage 1: Front Line Investigation Stage .....	13
Stage 2: Internal Investigation Stage .....	14
Stage 3: Final Stage (Appeal).....	17
12 Italia Conti Complaints Procedure for Parents of FE students .....	20
12.1 Additional policy statement on parental complaints .....	20
12.2 Procedure if a parent has a legitimate complaint .....	20
Stage 1: Front Line Investigation Stage .....	20
Stage 2: Internal Investigation Stage .....	21
Stage 3: Final Stage (Appeal).....	23
13 Italia Conti Complaints Procedure for Members of the Public .....	27
Appendix A: Exemplar Stage 1 Complaint Form.....	29
Appendix B: Exemplar Stage 2 Complaint Form: .....	32
Appendix C: Exemplar Stage 3 Appeal Form: .....	34
Appendix D: Unacceptable Behaviour .....	35
Appendix E: Persistent Complainants .....	37

## 1. Overview

Italia Conti is committed to providing a high-quality education and training experience for all its students. It is recognised that, from time to time, problems do arise and students, and parents or others may wish to alert us to aspects of our actions or behaviours where our standards are not what they should be. Italia Conti sees the handling and monitoring of complaints as an important aspect of its quality assurance procedures and its continuing improvement.

All issues identified as legitimate complaints will pass through the first of three formal stages in the Complaints Process. The first stage is contained at a Front Line level, and – in practice – this is where most complaints are resolved; through dialogue and collaboration. Italia Conti strongly encourages resolution of this kind and those wishing to make representation under this procedure will be expected to approach the complaints process with this in mind.

Italia Conti provides education at further and higher educational levels. It is expected that the working practices and processes of the policy will fulfil the specific needs and statutory requirements appropriate to each level.

## 2. Legislation

This document meets the requirements of section 29 of the Education Act 2002, which states that schools must have and make available a procedure to deal with all complaints relating to their school and to any community facilities or services that the school provides, and complies with the requirements set out in part 7 of the schedule to the Education (Independent School Standards) Regulations 2014, which states that Italia Conti must have and make available a written procedure to deal with complaints from parents of students at the school.

It is also based on guidance published by the Department of Education (DfE) on creating a complaints procedure that complies with the above regulations, and good practice guidance on setting up complaints procedures.

## 3. Purpose

The purpose of the Complaints Procedure is to provide a clear step by step process through which a complainant may make a complaint. Complainants are reminded that only by following the procedure outlined in this policy can they expect a full and satisfactory outcome to any complaint.

## 4. Scope

This policy document covers complaints made by students, applicants, offer-holders, parents/carers (for vulnerable adults or students under 18), and members of the public about Italia Conti, its staff, its services, facilities, admissions processes, course delivery, student support, extra-curricular activities, or other matters within Italia Conti's control.

For HE students, this policy applies alongside the respective university's academic regulations and complaints/appeals procedures where relevant (for which their programme is subcontracted/validated). Complaints relating to academic assessment, progression, award, academic appeals or academic complaints may need to be considered under the University's applicable procedures. Italia Conti will signpost students to the correct route.

## 5. Exclusions

Unsatisfactory treatment of one student by another student will be dealt with through the [Disciplinary Procedure](#) in the first instance. Italia Conti may instigate proceedings as it sees fit without the dissatisfied student being required to follow the complaints procedure outlined here.

Suggestions for alterations or improvements to the content or delivery of the course, or to the general conditions in the building, do not constitute a complaint matter, and should be made through the **student representatives** to the Course Committee Meeting.

Dissatisfaction with grades/assessments constitutes an academic matter and should be dealt with through the Italia Conti [Academic Appeals Policy](#) which references our partner

# ITALIA CONTI

---

university and awarding body academic regulations and academic appeals procedures. It should be noted that a student cannot appeal against academic judgement.

Dissatisfaction with the outcome of an Extenuation Panel should be dealt with via the relevant academic appeals procedure.

Bullying and harassment, sexual misconduct and sexual violence fall outside of complaints procedures and must be dealt with through the processes laid out in our [Anti-Bullying Policy Statement](#) or our [Harassment, Sexual Misconduct and Sexual Violence Policy](#).

Please also see section 7 below, which describes issues that do not fall within this complaints policy.

Matters may be redirected to another policy or process where that is the correct route, but Italia Conti will not reject a complaint solely because it could also be described as feedback, a concern, a conduct matter, academic matter, safeguarding matter or student support matter. Where a complaint raises issues that fall under more than one procedure, Italia Conti will explain which procedure or procedures will be used and why.

## 6. Definitions

### What is not a complaint

Italia Conti encourages its students to talk with their tutors about concerns<sup>1</sup> and compliments they have about their time with us. We welcome the opportunity to provide reassurances on concerns raised, and do; through day-to-day, informal communication as far as possible. And we value the feedback and collaborative environment that this creates at the school, as it ultimately enhances the learning environment.

If you have an opinion you wish to share about the services we are providing, we will happily listen to it and – if necessary – take action as a result of your suggestion.

---

<sup>1</sup> A **concern** is defined by the DfE as “an expression of worry or doubt over an issue considered to be important for which reassurances are sought”<sup>1</sup>.

# ITALIA CONTI

---

No procedural response should be expected in response to the expression of a concern, however, since it is part of the expected, day-to-day exchange between students and staff. A concern is unlikely to invoke the complaints process unless you have a clear and mutually understood expectation of something different to what you have experienced. To help with understanding this, examples of concerns that your tutor would hope to discuss with you but which do not invoke the complaints process at Italia Conti are:

- Not being offered a solo feature / leading role in a production or project, or being dissatisfied with casting decisions generally.
- Not liking the colour temperature of a studio.
- Not liking the flow of the timetable, the course curriculum generally.
- Not agreeing with grouping decisions or the deployment of staff within those groups.
- Not liking an assessment task/brief.

If you would like to raise a concern with someone, but – after reading this policy – are still not sure whether it falls within this Complaints policy or not, please speak with your tutor or another member of staff. You will not be dissuaded from making a legitimate complaint if you have one.

However, where a concern about course delivery, facilities, services, published information or the student experience alleges failure to deliver what was promised, material inaccuracy, unfairness, discrimination, failure to make reasonable adjustments, significant service failure, or significant disadvantage to a student, it may be considered under this Complaints Policy.

Dissatisfaction with academic, professional or creative judgement will not normally be treated as a complaint simply because the student disagrees with the outcome. However, a complaint may be considered where the student alleges procedural irregularity, bias, discrimination, harassment, failure to consider reasonable adjustments, failure to follow published criteria, misleading information, or failure to deliver an activity substantially as described.

## **What is a complaint**

# ITALIA CONTI

---

You should make a complaint<sup>2</sup> when Italia Conti (or its staff, as its representatives) have, or appear to have, failed to meet expected standards in its actions or behaviours towards you. Italia Conti's policies (including this one) and its contracts with its students define the actions, behaviours and standards that students and the public can expect from the organisation.

A complaint that legitimately falls within this policy may refer to any aspect of the teaching and learning process or general treatment of the student(s) by members of staff or the institution and will usually be about something that directly impacts the complainant. This presents a wide range of issues, and may include:

- Italia Conti not meeting obligations including those outlined in course/student handbooks or the student charter;
- misleading or incorrect information in prospectuses or promotional material and other information provided by Italia Conti;
- unreasonable or substandard delivery of a programme, teaching or administration including, where applicable, delivery by a partner provider;
- poor quality of learning resources or facilities;
- poor quality services<sup>3</sup>;
- inadequate response to events causing significant disruption to the normal delivery of a course, service or other aspect of the student experience, such as industrial action or a public health emergency;
- misleading, unfair or incorrect processes in policies or procedures relating to financial support, immigration processes or welfare support;
- the standard of service delivered by other organisations or contractors on behalf of the provider that the student feels has affected their learning experience;
- insensitive or disrespectful actions or use of language from Italia Conti towards its students, staff or the public, including that which displays insensitivity to an individual's dignity<sup>4</sup>. (Students should note, however, that being uncomfortable with or offended by unpopular or controversial concepts or perspectives introduced reasonably as part of an education programme is not grounds for legitimate complaint.<sup>5</sup>);

---

<sup>2</sup> A **complaint** is defined by the DfE as "an expression of dissatisfaction however made, about actions taken or a lack of action"

<sup>3</sup> For example, unsanitary bathroom or kitchen facilities, or unhygienic premises.

<sup>4</sup> Please note that this is different behaviour from bullying and harassment (which is dealt with under the Anti Bullying Policy Statement and the Harassment, Sexual Misconduct and Sexual Violence Policy and Procedure).

<sup>5</sup> Please see Italia Conti's policies on Freedom of Speech and [Academic Freedom](#) which explain this in greater detail.

- any other unreasonable behaviour by a member of staff which can be shown to have adversely affected either the professional nature of the staff/student relationship, or the progress of the student on the course.

All issues identified as legitimate complaints will pass through the first of three formal stages in the Complaints Process. The first stage is contained at a Front Line level, and – in practice – this is where most complaints are resolved; through dialogue and collaboration. Italia Conti strongly encourages resolution of this kind and those wishing to make representation under this procedure will be expected to approach the complaints process with this in mind.

Please see section 4 for a list of circumstances that should be dealt with under different policies.

## **Managing the investigating and handling of the complaint**

The person overseeing the complaint is responsible for ensuring that the process is conducted according to this document. Complaints will be overseen in accordance with the routing set out in Section 11 – Responsibilities and Management.

### **The Case Officer**

A Case Officer may be appointed to coordinate the administration of a complaint. This may include arranging meetings, managing communications, maintaining records, tracking timeframes, and supporting the person overseeing the complaint. The Case Officer does not normally investigate the complaint or decide the outcome.

### **The Investigating Officer**

The Investigating Officer will be responsible for investigating the complaint, considering relevant evidence, and preparing findings or recommendations. The Investigating Officer may meet with relevant parties and will keep an appropriate written record of their actions in respect of the complaint investigation (see section 7 below in respect of records management). The Investigating Officer does not normally decide the final outcome unless they have also been appointed to do so under the relevant stage of this procedure.

## 7. Core Principles

In consideration of a complaint, Italia Conti will adhere to the following principles:

- our ethos and aim are that all concerns and the majority of complaints will be satisfactorily dealt with at the Stage 1 Front Line investigation;
- all complaints will be treated fairly, impartially, and effectively;
- all complaints will be treated seriously and constructively and can be made without fear of victimisation;
- a full and fair investigation by an independent person or panel will be facilitated, where necessary;
- all the points at issue will be addressed with an effective and prompt response;
- any decisions that we make will be lawful, rational, reasonable, fair, and proportionate, and in line with the principles of administrative law;
- we will consider how the complaint can feed into Italia Conti's improvement evaluation processes;
- where a student has legitimately submitted a complaint that has not been upheld, that student will **not** be penalised in any way for raising a complaint.

In consideration of a complaints Italia Conti will follow these practices:

- wherever possible, the complaints will be resolved at the Stage 1 Front Line investigation;
- the Complaints Procedure will focus on resolving complaints rather than apportioning blame;
- the confidentiality owed to staff and students will be protected. Details of a complaint may, however, need to be shared with relevant parties for a full investigation to take place, and individuals named in a complaint will be made aware of the allegations and have the opportunity to give their version of events;
- repeated or vexatious complaints will not be considered;
- all parties involved in a complaint will be kept informed of the progress of the complaint at regular and appropriate intervals during the process;
- Italia Conti aims to respect complainants' desire for confidentiality and will keep confidential all records relating to individual complaints;
- Italia Conti accepts that there may be cases where a student is unable or reluctant to make a complaint or academic appeal without support from an advisor or representative and welcomes complaints from students who wish to be supported during the process. This

is in addition to any health professional or support worker who may usually accompany the student or who may attend at Italia Conti's discretion by way of making reasonable adjustments for a student.

- Italia Conti will keep written records of all complaints as set out in our GDPR Audit Register and Retention Schedule and our Data Protection Policy:
  - Detailed complaints records for non-safeguarding matters (which may include notes, correspondence and statements) will be kept during the life of the complaints process and until the expiry of six years from the date of the last action on the complaint, after which they will be destroyed.
  - Detailed complaints records for safeguarding matters (which may include notes, correspondence and statements) will be kept during the life of the complaints process and until the later of the normal retirement age of the person against whom the complaint was made or the expiry of ten years from the date of the last action on the complaint, after which they will be destroyed.
  - Summary complaints records (which contain information about the issue(s) raised, relevant dates, the process outcome, and reasons for it) will be kept during the life of the complaints process and thereafter for six years, after which they will be destroyed. These records will be used for sharing learning from complaints and appeals, as well as for analysis and management and governance reporting. These records will be anonymised to ensure that no parties are identifiable.
  - All complaints records will be classified as confidential records the custodian of which will be the Head of Quality, on behalf of the Chief Operating Officer. Access to these records will only be granted to:
    - Those investigating the complaint or members of a review panel.
    - The complainant, where entitled to access under applicable data protection legislation, including the UK GDPR and Data Protection Act 2018, subject to any applicable exemptions.
    - The Secretary of State for education (or their representative).
    - Appropriately authorised inspection, audit or regulatory officers.

## 8. Allegations against members of staff

# ITALIA CONTI

---

8.1 Where a complaint concerns a member of staff, the COO and/or HR Director will normally oversee the staff-related element of the complaint, unless the complaint relates to the COO, in which case the CEO (or their nominated deputy) will do so.

8.2 Where a complaint about a member of staff has been brought by a student, any staff disciplinary, capability or HR process will be handled separately under the relevant staff procedure. The student complaint will remain within this Complaints Policy, and the student will receive an outcome under the relevant complaints stage, although they may not be entitled to confidential details of any staff process or sanction.

8.3 Where a complaint concerns the CEO or Principal, the Chair of the Board of Directors, or another Board-nominated person, will oversee the investigation and handling of the complaint.

## 9. Timescales

Italia Conti aims to resolve any complaints in a timely manner. Timescales for each stage of the Complaints Procedure are set out in the relevant paragraphs. For the purposes of this policy, a "working day" is defined as a weekday during term time, when Italia Conti is open. The definition of "working day" excludes weekends and Bank Holidays.

The complainant must raise the complaint within three months of the incident. If the complaint is about a series of related incidents, they must raise the complaint within three months of the last incident.

Italia Conti may be flexible where necessary in respect of timescales, and will happily consider exceptions to this time frame in circumstances where there are valid reasons for not making a complaint at that time and the complaint can still be investigated in a fair manner for all involved. Depending on the circumstances, arguments for exception to this time frame may need to be supported by evidence.

Italia Conti may make reasonable adjustments to complaint timeframes or process requirements where this is appropriate because of disability, health, wellbeing, safeguarding, communication needs, or other good reason.

# ITALIA CONTI

---

When complaints are made out of term time, we will consider them to have been received on the next working day at the start of the next term.

If at any point Italia Conti cannot meet the timescales set out in this policy, they will:

- set new time limits with the complainant;
- Send the complainant details of the new deadline and explain the delay.

In all cases, Italia Conti aims to resolve all complaints within 90 calendar days.

## **10. Responsibilities and Management**

### **Complaint routing and oversight responsibility**

Complaints will be routed according to their subject matter. Student complaints and complaints about the student experience will normally be overseen by the Principal or a nominee appointed by the Principal. Complaints about staff conduct, staff professionalism or staff casework will normally be overseen by the COO, HR Director or a nominee appointed by the COO. Complaints about the COO will normally be overseen by the CEO or a CEO nominee. Complaints about the Principal or CEO will be escalated to the Chair of the Board of Directors or another Board-nominated person. Where a complaint raises issues across more than one area, Italia Conti will identify and record the appropriate route, overseer and decision-maker where applicable, taking account of the Scheme of Delegation, the nature of the complaint, any conflicts of interest, and the need for procedural fairness.

Italia Conti devolves day to day responsibility for managing the appropriate dissemination of this policy as follows:

#### **Students, Diploma, Degree and HE courses:**

Principal or nominee, supported as appropriate by the Vice Principal, Heads of School and Course Leaders

#### **Staff:**

COO and/or HR Director, with CEO involvement for COO, senior staff or reserved matters

#### **CEO / Principal matters:**

Chair of the Board of Directors or Board nominee

## **Role separation in complaints**

The person responsible for overseeing a complaint is responsible for ensuring that the complaint is routed correctly, that appropriate Case Officers, Investigating Officers and/or panel members are appointed, that conflicts of interest are considered, and that the process is completed fairly and in line with this policy.

A **Case Officer** may coordinate administration of the complaint, including communications, arranging meetings, maintaining records and tracking timeframes.

An **Investigating Officer** is responsible for investigating the complaint, considering relevant evidence, and preparing findings or recommendations.

Where a panel is required, the panel will consider the complaint or appeal and reach findings or recommendations in line with this policy.

A person who has overseen the process may sit on, or chair, a panel only where they have had no prior material involvement in the substance of the complaint and no conflict of interest. Administrative or procedural oversight, such as appointing a Case Officer, appointing an Investigating Officer, arranging a panel or monitoring timeframes, will not normally amount to material involvement. However, a person should not sit on or chair a panel if they have already investigated the complaint, made findings on the complaint, decided the outcome at an earlier stage, given a substantive view on the merits, or otherwise been materially involved in the issues under consideration.

Where, because of the size or structure of Italia Conti, complete separation of roles is not practicable, the reason for the appointment will be recorded and reasonable steps will be taken to ensure the process remains fair and impartial.

The Policy Steering Group, in conjunction with the Senior Leadership Team, is responsible for monitoring the cyclical review and updating of all policies across Italia Conti according to statutory and regulatory timeframes.

Academic themes arising from complaints should be referred to Academic Quality Board for thematic oversight and assurance where appropriate. Individual complaints should not normally be referred to AQB for decision unless required by the relevant academic procedure.

Italia Conti may make reasonable adjustments to the way this procedure is operated where there is a valid reason to do so, provided this does not disadvantage the complainant or any

## ITALIA CONTI

---

other party unfairly. Any significant departure from the normal procedure will be explained to the complainant and recorded.

Complaint procedures within Italia Conti will be independent of any formal legal proceedings which may ensue from the matters in question.

## 11. Italia Conti FE and HE Student Complaints Procedure

### 11.1 Additional policy statement on student complaints

It is hoped that most complaints and concerns will be resolved quickly and easily. All complaints will be treated seriously and confidentially.

No student should involve themselves in another student's complaint unless they are directly implicated as co-party or witness or are asked to do so in their capacity as one of the elected student representatives. No complaint can be made on behalf of another person unless that person has given written authority, or this is agreed as a reasonable adjustment or other appropriate support arrangement.

Students and staff involved in a complaint are expected to respect confidentiality and avoid unnecessary disclosure of information. This does not prevent a student from seeking confidential advice, support or representation, including from a student representative, adviser, family member, health professional, support worker, the University where relevant, or the OIA.

HE students (or anyone over the age of 18) are normally expected to raise and pursue their own complaints. However, a student may be supported by a representative, friend, family member, student representative, adviser, health professional or support worker where appropriate. A representative may speak or act on the student's behalf where the student has given written authority, or where this is agreed as a reasonable adjustment. Italia Conti may ask for written consent before sharing personal or sensitive information with any third party.

It is expected that any complaint should be dealt with by Italia Conti's complaints procedure, however, where the complaint cannot be resolved by Italia Conti's internal processes, the partner university may be the more appropriate conduit for the student.

For HE students on programmes delivered by Italia Conti as an Associate College of the University of Chichester, complaints should normally be raised with Italia Conti in the first instance where they relate to Italia Conti delivery, services, facilities, support, conduct, extra-curricular activities or local operational matters. Where a complaint relates to University academic regulations, assessment, progression, award, academic appeals, or matters

# ITALIA CONTI

---

reserved to the University, Italia Conti will signpost the student to the University of Chichester's applicable procedures.

Where a complaint involves both Italia Conti and University matters, Italia Conti will explain how the matter will be routed and whether it will be considered by Italia Conti, the University, or both.

Further advice on the procedures of Italia Conti's HE partner universities, and advice on how to access them is available via:

[www.uel.ac.uk/qa/studentsarea/studentcomplaints](http://www.uel.ac.uk/qa/studentsarea/studentcomplaints)

(for students on courses validated by UEL) - references to the University of East London apply only to students, if any, who remain registered under UEL teach-out arrangements).

[Academic Regulations: Procedures - Resolving Student Complaints](#)

(for students on courses validated by the University of Chichester)

## 11.2 Procedure if a student has a legitimate complaint<sup>6</sup>

### Stage 1: Front Line Investigation Stage

[1] If a student has a complaint, they should complete and submit a Stage 1 Complaint Form. This form records only basic information about the complaint and the complainant and triggers the creation of an appointment to discuss the complaint privately. The form will enable them to choose a member of staff to discuss their issue with. Students are encouraged to discuss the matter with their Head of Year and / or Course Leader. The Stage 1 Complaints Form can be found on the website or accessed through a student's ProPortal™ account. A non-submittable version of it is available at Appendix A of this document, for information only.

[2] We will acknowledge receipt of the complaint and provide the student with a front line investigation appointment within two (2) working days. We will aim to arrange the

---

<sup>6</sup> The definition of a complaint that legitimately falls within this policy can be found in [section 6](#).  
Italia Conti | Complaints Policy & Procedures | v 2526 -1.1

# ITALIA CONTI

---

investigation appointment for within three (3) working days of the acknowledgement but will be flexible in rearranging this appointment where it is not convenient for the complainant.

- [3] During the front line investigation discussion, the complainant and member of staff will discuss the facts of the complaint, with the intention of investigating and resolving the problem quickly and easily. The staff member will make a record of the meeting, the points raised, and actions agreed.
- [4] The staff member will investigate the complaint and aim to achieve a resolution to the issue within ten (10) working days of the front line appointment. A progress update and projected delay will be issued at this stage if the complaint cannot be resolved within this timescale.
- [5] Following the investigation or responsive action, the staff member will provide a written response to the complainant, which will:
- Explain the proposed resolution;
  - If there is no resolution, explain the reasons for this;
  - Advise that the complainant may proceed to Stage 2 of the Complaints Process if they are dissatisfied with the outcome of Stage 1;
  - Request that the complainant confirms either their satisfaction with the resolution or confirms that they wish to proceed to Stage 2 of the Complaints Process within five (5) working days of the date of the response;
  - Advise that if the complainant does not respond within five (5) working days from the date of the response, their complaint entry will automatically close, marking the closure of the complaint.

Proposed actions may include:

- Closure of the matter, with no action upon this occasion;
- A formal apology;
- Discussion of the complaint matter with the member of staff concerned, with or without the Course Leader being present, as appropriate;
- Informal action by the Course Leader - normally discussion with the member of staff concerned or relevant line-manager, as appropriate;

# ITALIA CONTI

---

- A recommendation for further action by the complainant; for example, progressing the complaint to the next stage.

Where the complaint raises a possible entitlement to a refund, compensation, credit, alternative provision, transfer support or another remedy, the Stage 1 response should identify whether this has been considered or whether the matter needs to proceed to Stage 2 or another relevant process.

- [6] Complainant confirms their response to the Front Line Investigation outcome. In most circumstances, the complainant will be satisfied with the resolution, and the complaint will be closed. However, if the complainant is not satisfied with the level of action proposed at this stage, they may decide to proceed to Stage 2 of the Italia Conti complaints process.

## **Stage 2: Internal Investigation Stage**

- [7] Within five (5) working days of their confirmation that they wish to proceed to Stage 2, the complainant should complete a Stage 2 Complaint Form, setting out the circumstances surrounding the complaint, and the rationale for their dissatisfaction with the outcome of Stage 1. The Complaints Form will be made available through a link in the outcome of the Stage 1 notification or can be accessed via the student's ProPortal™ account. A non-submittable version of it is available at [Appendix B](#) of this document, for information.

- [8] We will acknowledge receipt of the complaint within two (2) working days and will aim to conduct an internal investigation and respond to it within ten (10) working days (term time) from the date of acknowledgement.

At this step, any relevant member(s) of staff named in the complaint will also be informed that a complaint has been lodged and that it will be investigated and considered based on the evidence provided and discussions deemed appropriate.

For student complaints the Principal or a nominee appointed by the Principal will normally oversee the investigation and handling of the complaint. The Principal or

# ITALIA CONTI

---

nominee may appoint a Case Officer to coordinate the complaint and an Investigating Officer to investigate the complaint and prepare findings or recommendations.

Where the complaint is primarily about staff conduct, staff professionalism or staff casework, the complaint will be managed in consultation with the COO and/or HR Director, and any staff process will be handled separately under the relevant staff procedure.

Where a complaint relates to the COO, the CEO or a CEO nominee will oversee the investigation and handling of the complaint.

Where a complaint relates to the Principal or CEO, the Chair of the Board of Directors or another Board-nominated person will oversee the investigation and handling of the complaint. The CEO, COO, Principal, Chair of the Board of Directors, Board nominee, or other nominee, as applicable under the routing above, will normally oversee the investigation and handling of complaints, including nominating case officers, investigating officers, and panel members where required.

[9] In investigating the complaint, the Investigating Officer will review documentation and may meet with relevant parties (including the complainant) to establish whether:

- there is valid basis for the complaint;
- the complaint falls within this complaints procedure;
- responding to the complaint requires it to be dealt with in another way.

The complainant is welcome to bring a person to support them at meetings with the Investigating Officer. The Investigating Officer will keep written records of all meetings and interviews held in relation to the complaint and at which stage the complaint was at when it was resolved or not resolved at all.

Once the Investigating Officer is satisfied that, so far as is practicable, all the relevant facts have been established, findings or recommendations will be prepared on whether the complaint is upheld, partly upheld not upheld, requires escalation a decision will be

## ITALIA CONTI

---

made as to the validity of the complaint, and – where appropriate – recommendations will be made for actions to be taken in response to it.

[10] Once a decision has been reached on whether the complaint is upheld, partly upheld or not upheld, and any appropriate actions by Italia Conti agreed, the person overseeing the complaint, or their nominee will communicate this in writing to the complainant. The written outcome will explain the complaint issues considered, the evidence reviewed, the findings, the reasons for the decision, any action or remedy to be provided, and the student's right to proceed to Stage 3 if dissatisfied. They will also:

- Arrange for the appropriate action to be taken.
- Advise that the complainant has the right to appeal against the decision by responding in writing within ten (10) working days (term time) of the Stage 2 decision;
- Request that the complainant confirms either their satisfaction with the resolution or that they wish to proceed to Stage 3 of the Complaints Process within five (5) working days of the date of the response;
- Advise that if the complainant does not respond, their complaint entry will automatically close five (5) working days from the date of the letter, marking the closure of the complaint.

Where – as a result of the investigation – a member of staff is perceived by the Investigating Officer to be failing to meet the required standards of professionalism demanded by Italia Conti, the COO and/or HR Director will be advised so that any appropriate action can be considered under the relevant staff procedure. Where the matter concerns the COO, Principal or CEO, it will be escalated in accordance with Section 11. The complainant, or other students directly implicated, may be asked to produce further written statements as part of the staff disciplinary process, or any other action taken by the Italia Conti.

[11] Where a formal course of action taken in response to the complaint proves unsuccessful in addressing a problem, or where a complainant is not satisfied that their complaint has been dealt with appropriately, the complainant has the right to appeal against the decision by responding in writing as part of Stage 3 of the complaints process (see below). The grounds for appeal are set out in Stage 3 below.

# ITALIA CONTI

---

Grounds for appeal may include (but are not confined to):

- The complainant considers that the investigation was not conducted appropriately (i.e. according to the Italia Conti complaint policy and procedures).
- The decision was unreasonable or not supported by the evidence;
- New evidence is available that could not reasonably have been provided earlier.
- There was bias or a reasonable perception of bias;
- The remedy or action proposed was unreasonable or disproportionate.

## Stage 3: Final Stage (Appeal)

[12] Written appeals against decisions reached in Stage 2 should be submitted in writing to [SpeakUp@italiaconti.co.uk](mailto:SpeakUp@italiaconti.co.uk) no later than ten (10) working days after the date of the Stage 2 decision letter. There is no prescribed format for presenting an appeal. However, the appeal should explain the grounds of appeal and provide any supporting evidence. The complainant does not need to repeat all the facts of the complaint unless they are relevant to the appeal grounds, and complainants are asked to be succinct in their reasons for appealing.

[13] We will acknowledge receipt of the appeal within two (2) working days and will aim to perform a review and respond with its conclusions within ten (10) working days (term time) from the date of acknowledgement. The person overseeing the appeal will decide whether the appeal will be considered by a single reviewer or by an appeal panel, taking account of the nature, complexity, seriousness and potential impact of the complaint, any conflicts of interest, and the need for procedural fairness. The reason for using a single reviewer or an appeal panel will be recorded.

For **student complaints**, Stage 3 appeals will normally be overseen by the Principal, or a nominee appointed by the Principal. The Principal or nominee will appoint the single reviewer or appeal panel, identify any panel chair, and ensure the reviewer or panel is able to act impartially. Where a panel is used, it will normally comprise at least three people who have not had prior material involvement in the substance of the complaint.

## ITALIA CONTI

---

A panel will normally be used where the appeal raises complex issues, serious allegations, potential staff conduct or safeguarding issues, significant student detriment, significant financial remedy, regulatory risk, or where the outcome could materially affect a student's continuation, access to study, services or support.

Where a student complaint concerns the conduct or professionalism of **a member of staff**, the complaint will be managed in consultation with the COO and/or HR Director. Any staff disciplinary, capability or HR process will be handled separately under the relevant staff procedure. The student will be told the outcome of their complaint but may not be entitled to confidential details of any staff process or sanction.

**Where the complaint concerns the Principal**, the appeal will be referred to the Chair of the Board of Directors or another Board-nominated person. Where the Principal has had prior material involvement but is not the subject of the complaint, the appeal will be overseen by the CEO or another senior nominee with no prior material involvement. Where the complaint concerns the CEO, the appeal will be referred to the Chair of the Board of Directors or another Board-nominated person.

Where the complaint has been brought by a student, the student complaint will remain within this procedure and the student will receive a Stage 3 outcome under paragraph [15]. The student may not be entitled to confidential details of any separate staff process or sanction.

- [14] The reviewer or appeal panel will review all of the complaint circumstances, the conduct of the investigation, its outcomes and recommendations, and the success or otherwise of any resolution actions.

Where a panel is convened, the Principal, nominee, CEO, COO, Chair of the Board of Directors or Board nominee may sit on, or chair, the appeal panel only where they have had no prior material involvement in the substance of the complaint and no conflict of interest. Administrative or procedural oversight of the complaint process will not normally prevent a person from sitting on or chairing a panel, provided they have not investigated the complaint, decided the Stage 2 outcome, given a substantive view on the merits, or otherwise been materially involved in the issues under appeal.

# ITALIA CONTI

---

[15] Following the review, the reviewer or panel will decide whether the appeal should be upheld, partly upheld, or not upheld, and whether any further action or remedy is required. The decision will be communicated to the complainant in writing, with reasons, by the person overseeing the appeal, the reviewer or the panel chair.

The Stage 3 decision is final and closes the Italia Conti complaints process, unless the complainant is an HE student and the matter must be completed through the student's relevant validating/subcontracting university's procedures before the internal process is complete. Complainants may still have the right to external review, as set out below.

## External Review

Where the complainant remains dissatisfied after a full investigation and exhaustion of the Italia Conti process, they may refer their complaint to an external review body, where eligible.

For HE students on programmes delivered by Italia Conti as an Associate College of the University of Chichester, some complaints may need to be considered by the University of Chichester under its own procedures before the internal process is complete. Where this applies, Italia Conti will explain the correct route and signpost the student to the relevant University procedure.

Complainants on courses validated by UEL may refer their case to the University of East London to conduct an independent review through their own procedures if they so wish, at the exhaustion of Italia Conti's procedures. Please see [UEL's student complaint procedure](#) for more information. Where the complainant remains dissatisfied after a full investigation and exhaustion of the UEL process, they may refer their complaint to the Office of the Independent Adjudicator. References to the University of East London apply only to students, if any, who remain registered under UEL teach-out arrangements.

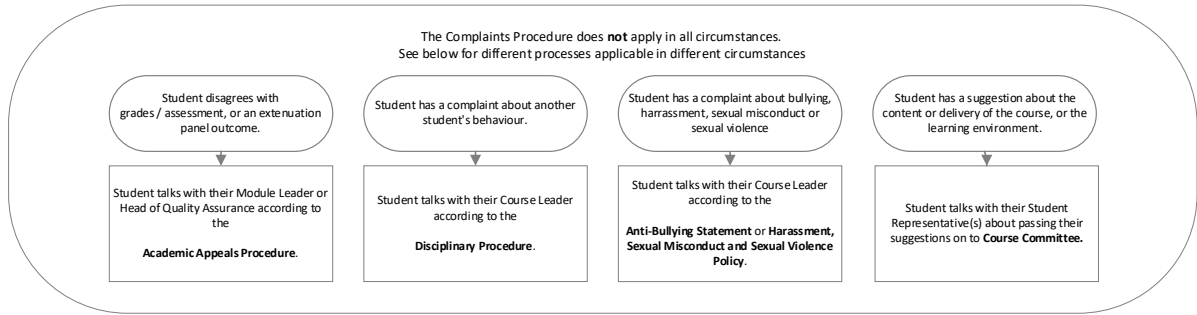
FE students may refer their complaint to the Department of Education (DfE). Further details and advice can be found at: [Complaints about post 16 education and training provision funded by DfE- GOV.UK \(www.gov.uk\)](#).

## ITALIA CONTI

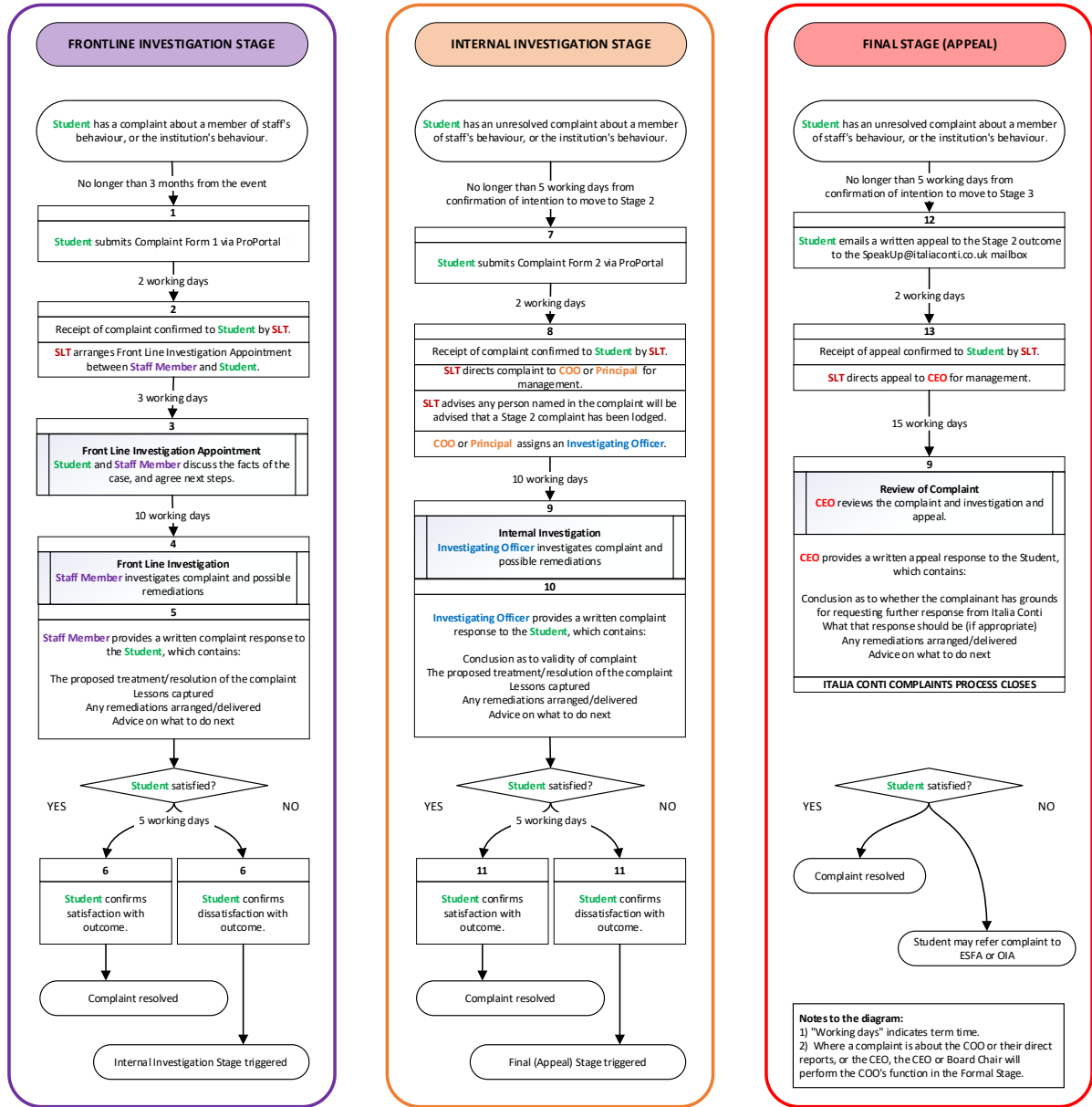
---

HE students may be able to refer their complaint to the Office of the Independent Adjudicator for Higher Education (OIA), which operates the independent complaints scheme for higher education students. Where Italia Conti is the final decision-maker for the complaint, Italia Conti will issue a Completion of Procedures letter where required. The OIA will determine whether a complaint is eligible under its scheme. The usual time limit for bringing a complaint to the OIA is 12 months from the date of the Completion of Procedures letter. Further information is available at [www.oiahe.org.uk](http://www.oiahe.org.uk).

# ITALIA CONTI



## Italia Conti Student Complaints Procedure



## 12. Italia Conti Complaints Procedure for Parents of FE students

### 12.1 Additional policy statement on parental complaints

Italia Conti has long prided itself on the quality of the teaching and pastoral care provided to its students. However, if parents or carers do have a complaint, they can expect it to be treated by Italia Conti in accordance with this Procedure.

It is hoped that most complaints will be resolved quickly and easily. Parents and carers can be assured that all complaints will be treated seriously and confidentially.

### 12.2 Procedure if a parent has a legitimate complaint<sup>7</sup>

#### Stage 1: Front Line Investigation Stage

[1] If parents / carers have a complaint, they should complete and submit a Stage 1 Complaint Form. This form records only basic information about the complaint and the complainant and triggers the creation of an appointment to discuss the complaint privately, either in person, or virtually. The form will enable them to choose a member of staff to discuss their issue with, and students are encouraged to discuss the matter with the relevant Head of Year and / or Course Leader. The Complaints Form can be found on the website at <https://www.italiaconti.com/about-us/policies>. A non-submittable version of it is available at [Appendix A](#) of this document, for information only. In many cases the matter will be resolved straightaway by this means to the complainant's satisfaction.

[2] We will acknowledge receipt of the complaint and provide the complainant with a front line investigation appointment within two (2) working days. We will aim to arrange the investigation appointment for within three (3) working days of the acknowledgement but will be flexible in rearranging this appointment where it is not convenient for the complainant.

[3] At the front line investigation discussion, the complainant and member of staff will discuss the facts of the case, with the intention of investigating and resolving the

---

<sup>7</sup> The definition of a complaint that legitimately falls within this policy can be found in [section 6](#).

problem quickly and easily. The staff member will make a written record of the meeting, the points raised, and the actions agreed.

- [4] The staff member will investigate the complaint, and aim to achieve a resolution to the issue within ten (10) working days of the front line appointment. A progress update and projected delay will be issued at this stage if the complaint cannot be resolved within this timescale.
- [5] Following the investigation or responsive action, the staff member will provide a written response to the complainant, which will:
- Explain the proposed resolution;
  - if there is no resolution, explain the reasons for this;
  - Advise that the complainant may proceed to Stage 2 of the Complaints Process if they are dissatisfied with the outcome of Stage 1;
  - Request that the complainant confirms either their satisfaction with the resolution, or that they wish to proceed to Stage 2 of the Complaints Process within five (5) working days of the date of the response;
  - Advise that if the complainant does not respond within five (5) working days from the date of the response, their complaint entry will automatically close, marking the closure of the complaint.
- [6] If the complainant is dissatisfied with the outcome of Stage 1, they should confirm their intention to proceed with their complaint in accordance with Stage 2 of the Italia Conti Complaints Process.

## **Stage 2: Internal Investigation Stage**

- [7] The complainant should complete a Stage 2 Complaint Form, setting out the circumstances surrounding the complaint, and the rationale for their dissatisfaction with the outcome of Stage 1. A non-submittable version of it is available at [Appendix B](#) of this document, for information.
- [8] We will acknowledge receipt of the complaint within two (2) working days and will aim to conduct an internal investigation and respond to it within ten (10) working days (term time) of the date of acknowledgement.

At this step, any relevant member(s) of staff named in the complaint will also be informed that a complaint has been lodged and that it will be investigated and considered based on the evidence provided and discussions deemed appropriate.

For parent/carer complaints about an FE student's education, training, student experience or support, the Principal or a nominee appointed by the Principal will normally oversee the investigation and handling of the complaint. The Principal or nominee may appoint a Case Officer to coordinate the complaint and an Investigating Officer to investigate the complaint and prepare findings or recommendations.

Where the complaint is primarily about staff conduct, staff professionalism or staff casework, the complaint will be managed in consultation with the COO and/or HR Director, and any staff process will be handled separately under the relevant staff procedure.

Where a complaint relates to the COO, the CEO or a CEO nominee will oversee the investigation and handling of the complaint.

Where a complaint relates to the Principal or CEO, the Chair of the Board of Directors or another Board-nominated person will oversee the investigation and handling of the complaint.

The CEO, COO, Principal, Chair of the Board of Directors, Board nominee, or other nominees, as applicable under the routing above, will oversee the investigation and handling of complaints within their remit. This may include appointing Case Officers, Investigating Officers and panel members where required. The Principal will normally manage the investigation and handling of student related complaints, often performing the function of Investigating Officer. However, after initially considering the complaint and the most appropriate course of action to take, they may choose to delegate the function of Investigating Officer to an allocated independent staff member.

[9] In investigating the complaint, the Investigating Officer will review documentation and may meet with relevant parties (including the complainant) to establish whether:

- there is valid basis for the complaint;

- the complaint falls within these complaints procedure;
- responding to the complaint requires it to be dealt with in another way

The Investigating Officer will keep written records of all meetings and interviews held in relation to the complaint and at which stage the complaint was at when it was resolved or not resolved at all.

Once the Investigating Officer is satisfied that, so far as is practicable, all the relevant facts have been established, findings or recommendations will be prepared on whether the complaint is upheld, partly upheld, not upheld, or requires escalation, and – where appropriate – recommendations will be made for actions to be taken in response to it.

[10] Once a decision has been reached on whether the complaint is upheld, partly upheld or not upheld and any appropriate actions agreed, the person overseeing the complaint, or their nominee will communicate this in writing to the complainant, providing reasons for their decision(s), and will arrange for the appropriate action to be taken. They will also:

- Advise that the complainant has the right to appeal against the decision by responding in writing within 10 working days (term time) of the Stage 2 decision.
- Request that the complainant confirms either their satisfaction with the resolution or that they wish to proceed to Stage 3 of the Complaints Process within five (5) working days of the date of the response;
- Advise that if the complainant does not respond, their complaint entry will automatically close five (5) working days from the date of the letter, marking the closure of the complaint.

Where – as a result of the investigation – a member of staff is perceived by the Investigating Officer to be failing to meet the required standards of professionalism demanded by Italia Conti, the COO and/or HR Director will be advised so that any appropriate action can be considered under the relevant staff procedure. Where the matter concerns the COO, Principal or CEO, it will be escalated in accordance with Section 11. The complainant, or other students directly implicated, may be asked to produce further written statements as part of the staff disciplinary process, or any other action taken by the Italia Conti.

[11] Where a formal course of action taken in response to the complaint proves unsuccessful in addressing a problem, or where a complainant is not satisfied that their complaint has been dealt with appropriately, the complainant has the right to appeal against the decision as part of Stage 3 of the Complaints Process (below).

### **Stage 3: Final Stage (Appeal)**

[12] Appeals against decisions reached in Stage 2 should be submitted in writing to [SpeakUp@italiaconti.co.uk](mailto:SpeakUp@italiaconti.co.uk) no later than ten (10) working days after the date of the Stage 2 decision letter. There is no prescribed format for presenting an appeal, but complainants are asked to be succinct in their reasons for appealing, and not to re-present the facts of the case, since these will already have been recorded.

[13] We will acknowledge receipt of the appeal within two (2) working days. The person overseeing the appeal will decide whether the appeal will be considered by a single reviewer or by an appeal panel, taking account of the nature, complexity, seriousness and potential impact of the complaint, any conflicts of interest, and the need for procedural fairness. We will aim to complete the review and respond with conclusions within ten (10) working days during term time from the date of acknowledgement. The reason for using a single reviewer or an appeal panel will be recorded.

For parent/carer complaints about an FE student's education, training, student experience or support, Stage 3 appeals will normally be overseen by the Principal or a nominee appointed by the Principal, provided they have had no prior material involvement in the matter.

The Principal or nominee will appoint the single reviewer or appeal panel, identify any panel chair, and ensure the reviewer or panel is able to act impartially. Where a panel is used, the Principal or nominee will appoint a panel of at least three persons not directly involved in the matter detailed in the complaint, one of whom shall be independent of the management and running of Italia Conti where required or appropriate. In the event of the complaint involving sensitive material, the Principal or nominee will share the names of the panel members with the complainant, so that they have the opportunity to object to a panel member; for example, on the grounds of bias.

Where a panel is convened, the Principal, nominee, CEO, COO, Chair of the Board of Directors or Board nominee may sit on, or chair, the appeal panel only where they have had no prior material involvement in the substance of the complaint and no conflict of interest. Administrative or procedural oversight of the complaint process will not normally prevent a person from sitting on or chairing a panel, provided they have not investigated the complaint, decided the Stage 2 outcome, given a substantive view on the merits, or otherwise been materially involved in the issues under appeal.

Where the complaint concerns the Principal, the appeal will be referred to the Chair of the Board of Directors or another Board-nominated person. Where the Principal has had prior material involvement but is not the subject of the complaint, the appeal will be overseen by the CEO or another senior nominee with no prior material involvement. Where the complaint concerns the CEO, the appeal will be referred to the Chair of the Board of Directors or another Board-nominated person.

- [14] Where a panel is used, it will be chaired by a person appointed by the Principal or nominee who has had no prior material involvement in the complaint. The reviewer or appeal panel will review the circumstances of the complaint, the conduct of the Stage 2 investigation, its outcomes and recommendations and the success (or not) of resolution outcomes. If the reviewer deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the hearing. Copies of such particulars shall be supplied to all parties not later than seven (7) working days prior to the hearing.

Where a panel is used, the panel may wish to hear in-person statements, which may be daunting for a complainant. Panel hearings will be conducted in a constructive and non-aggressive manner and will be governed so as not to intimidate the complainant. Nonetheless, complainants are welcome to be accompanied to the hearing by one other person, who may be a relative, teacher or friend, to provide support if they would like to do so. Legal representation will not normally be appropriate.

If possible, the Panel will resolve the complaint without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out.

[15] After due consideration of all facts they consider relevant, and within two (2) working days of the review decision or appeal panel hearing, the reviewer or appeal panel will prepare a report summarising the decisions reached and making any recommendations for action.

[16] Within five (5) working days of the review decision or panel hearing, the Principal, nominee, reviewer or panel chair will communicate the reviewer's or panel's findings to the complainant and to the person(s) named in the complaint. This communication will confirm:

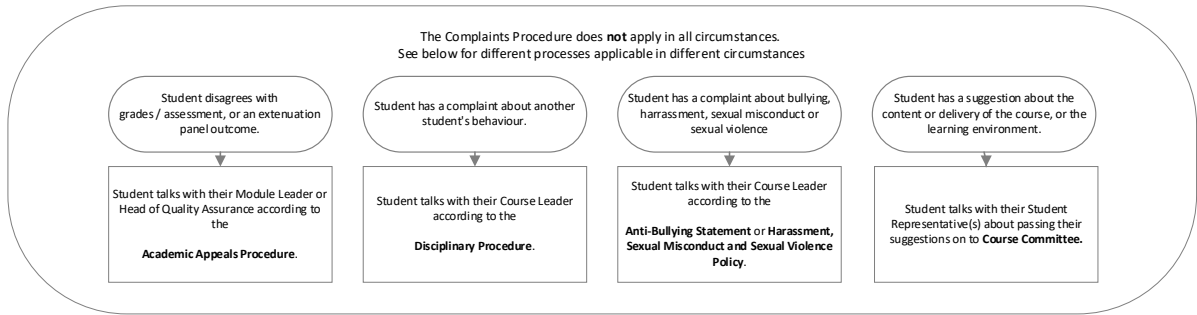
- That the findings represent a final decision which closes the Italia Conti Complaints Process;
- Italia Conti's commitment to fulfilling the actions recommended to it by the reviewer or appeal panel;

Whilst this Stage closes the Italia Conti Complaints Process, complainants still have the right to external adjudication on the matter if they wish to pursue it.

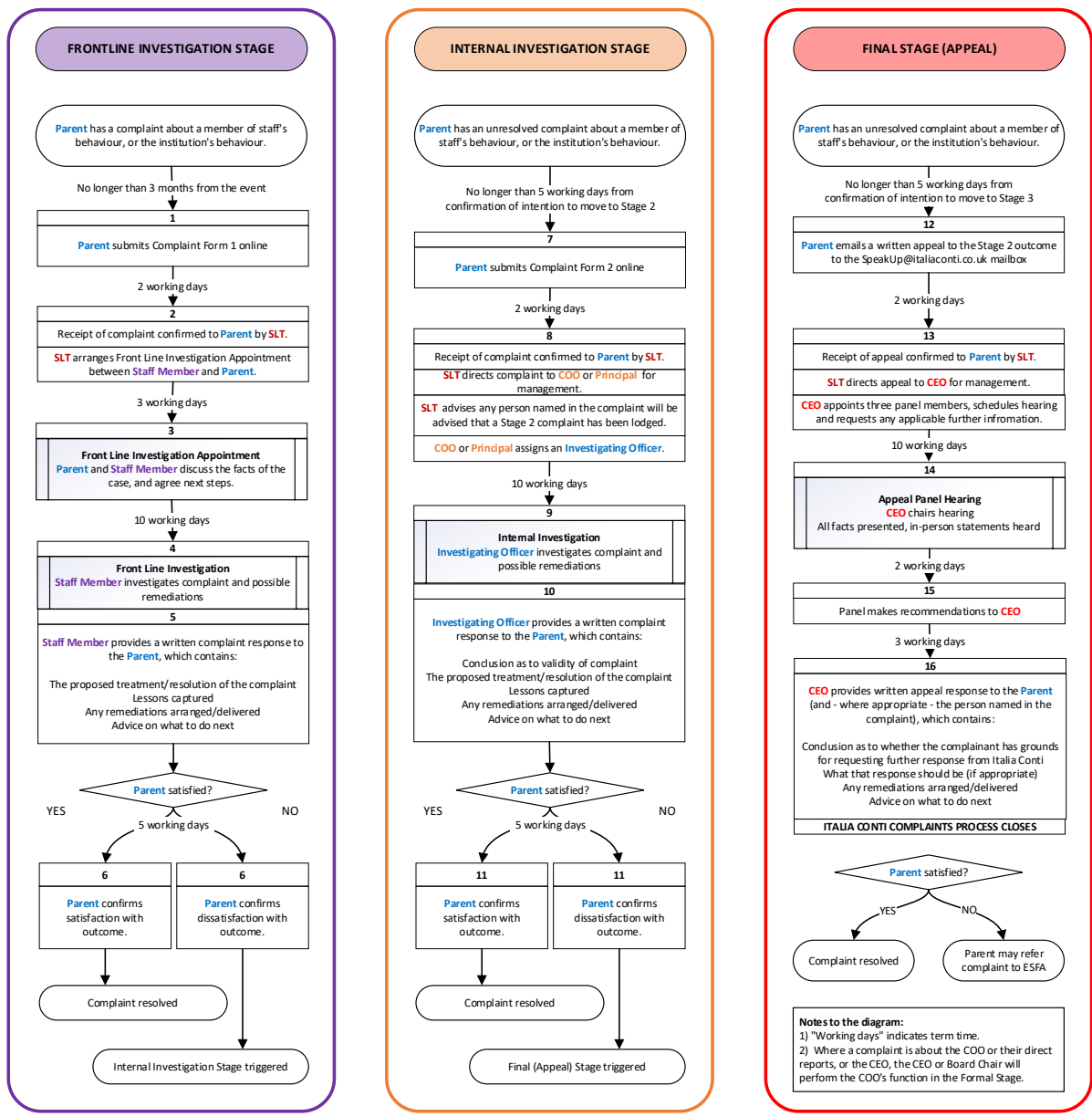
## **Independent Adjudication**

Where the complainant remains dissatisfied after a full investigation and exhaustion of the Italia Conti process, they may refer their complaint to the Education and Skills Funding Agency (ESFA). Further details and advice can be found at: [Complaints about post 16 education and training provision funded by ESFA - GOV.UK \(www.gov.uk\)](#).

# ITALIA CONTI



## Italia Conti Complaints Procedure for Parents of FE Students



## 13. Italia Conti Complaints Procedure for Members of the Public

Where a member of the public feels that the behaviour or actions of Italia Conti, or of its staff or students have not met the standards it publicly claims to uphold or is required to uphold, they are entitled to complain about this to the organisation. All such complaints will be treated seriously.

Complaints from members of the public should be made directly to the COO via the [SpeakUp@italiaconti.co.uk](mailto:SpeakUp@italiaconti.co.uk) mailbox.

Because the nature of complaints from members of the public is unpredictable and because they may occur outside of term time, no timeframes are prescribed for this procedure save the timeframes outlined below, and Italia Conti's commitment to concluding the complaints process within ninety (90) calendar days.

The procedure for responding to complaints from members of the public will broadly follow the steps outlined below.

[1] We will acknowledge receipt of the complaint within three (3) working days and advise on the timescale and the approach to be taken for investigating the complaint.

At this step, any relevant member(s) of staff named in the complaint will also be informed that a complaint has been lodged and that it will be investigated and considered based on the evidence provided and discussions deemed appropriate.

Complaints from members of the public will normally be overseen by the CEO or a nominee. Where the complaint primarily concerns student conduct, student experience, academic delivery or safeguarding, the CEO may route the matter to the Principal, COO, DSL or another appropriate person or process. Where the complaint concerns staff conduct, it will normally be managed in consultation with the COO and/or HR Director.

Where a complaint concerns a member of staff, the COO and/or HR Director will normally oversee or advise on the staff-related element. Where a complaint concerns the COO, the CEO or a CEO nominee will oversee the investigation. Where a complaint concerns the Principal or CEO, the Chair of the Board of Directors or another Board-nominated person will oversee the investigation.

[2] In investigating the complaint, the Investigating Officer will review documentation and may meet with relevant parties (including the complainant) to establish whether:

- there is valid basis for the complaint;
- the complaint falls within this complaints procedure;
- responding to the complaint requires it to be dealt with in another way.

Once the Investigating Officer is satisfied that, so far as is practicable, all the relevant facts have been established, a conclusion will be reached as to the validity of the complaint, and – where appropriate – recommendations will be made for actions to be taken in response to it. Where the Investigating Officer is not the person overseeing the complaint, the findings or recommendations will be reported to the person overseeing the complaint.

[3] Within ninety [90] calendar days of the receipt of the complaint, the person overseeing the complaint will respond to the complainant in writing, confirming:

- The findings of the investigation;
- Italia Conti's commitment to fulfilling the recommendations reached during the investigation;
- That the findings represent a final decision which closes the Italia Conti Complaints Process.

## Appendix A: Exemplar Stage 1 Complaint Form

<b>Stage 1 Complaint Form</b>	
<b>Section 1:</b> <b>Important information and guidance – please read before submitting your complaint</b>	
<p>You are advised to read through the Complaints Policy, found on the website here: <a href="https://www.italiaconti.com/about-us/policies">https://www.italiaconti.com/about-us/policies</a></p> <p>It contains important information about what constitutes a complaint, how your complaint will be handled and respective timeframes.</p> <p>Italia Conti encourages its students to talk with their tutors about concerns they have about their time with us. We welcome the opportunity to provide reassurances on concerns raised, and do; through day-to-day, informal communication as far as possible.</p> <p>A concern is unlikely to invoke the complaints process unless you have a clear and mutually understood expectation of something different to what you have experienced.</p> <p>A complaint that legitimately falls within this policy may refer to any aspect of the teaching and learning process or general treatment of the student(s) by members of staff or the institution and will usually be about something that directly impacts the complainant. concern is unlikely to invoke the complaints process unless you have a clear and mutually understood expectation of something different to what you have experienced.</p> <p>If you would like to raise a concern with someone, but – after reading the Complaints Policy – are still not sure whether it falls within the Complaints Policy or not, please speak with your tutor or another member of staff. You will not be dissuaded from making a legitimate complaint if you have one.</p> <p>Stage 1: All issues identified as legitimate complaints will pass through the first of three formal stages in the Complaints Process. Italia Conti's ethos and aim is that all concerns and the majority of complaints will be satisfactorily dealt with at the Stage 1 Front Line Investigation stage.</p>	
<p>1. Please confirm that you have read and understood the definitions, and the policy itself.</p> <p><input type="radio"/> Yes</p>	
<b>Section 2: Complainant Details</b>	
2. First name	
3. Surname	
4. Contact Email address	
5. Contact mobile number	
6. Are you currently enrolled on a course at Italia Conti?	Yes / No
Yes:	Go to Section 3: Current Student Details -7. Student Ref details: -8. Course (drop down list:
No:	Go to Section 4 - Details of Complaint

## Section 4: Details of Complaint:

A complaint that legitimately falls within this policy may refer to any aspect of the teaching and learning process or general treatment of the student(s) by members of staff or the institution and will usually be about something that directly impacts the complainant. This presents a wide range of issues, and may include:

- Italia Conti not meeting obligations including those outlined in course/student handbooks or the student charter;
- misleading or incorrect information in prospectuses or promotional material and other information provided by Italia Conti;
- unreasonable or substandard delivery of a programme, teaching or administration including, where applicable, delivery by a partner provider;
- poor quality of learning resources or facilities;
- poor quality services;
- inadequate response to events causing significant disruption to the normal delivery of a course, service or other aspect of the student experience, such as industrial action or a public health emergency;
- misleading, unfair or incorrect processes in policies or procedures relating to financial support, immigration processes or welfare support;
- the standard of service delivered by other organisations or contractors on behalf of the provider that the student feels has affected their learning experience;
- insulting or offensive insensitive or disrespectful actions or use of language from Italia Conti behaviour towards its students, staff or the public, including that which displays insensitivity to a student's an individual's dignity own beliefs or culture. (Students should note, however, that being uncomfortable with or offended by unpopular or controversial concepts or perspectives introduced reasonably as aspects part of an education the programme is not which reasonably introduce views or opinions other than their own, and that may be considered offensive, cannot be seen as grounds for legitimate complaint;
- any other unreasonable behaviour by a member of staff which can be shown to have adversely affected either the professional nature of the staff/student relationship, or the progress of the student on the course.

### **9. Please set out the main points of your complaint, including whether you have already spoken to anyone at Italia Conti about it.**

It is helpful if, in providing your complaint, you can adhere to the following guidance:

- Be concise and stick to the facts
- Present the facts in a chronological order, as far as possible
- Try and keep emotion out of your reported complaint, but do explain how you feel it has affected you and any resulting impact

Enter your answer:

### **10. You are encouraged to discuss your issue with your Head of Year and / or Course Leader. If there is someone else that you would like to discuss this matter with, please enter their name or role here:**

Enter your answer:

# ITALIA CONTI

---

**11. Desired Outcomes: What actions do you feel might resolve the problem at this stage?**

Enter your answer:

**Submit**

## Appendix B: Exemplar Stage 2 Complaint Form:

<b>Stage 2 Complaint Form</b>	
<b>Section 1- Please use this form if you wish to proceed from Stage 1 to Stage 2 of the Complaints Process.</b>	
<p>You are advised to read through the <b>Complaints Policy</b>, found on the website here: <a href="https://www.italiaconti.com/about-us/policies">https://www.italiaconti.com/about-us/policies</a></p> <p>It contains important information about what constitutes a complaint, how your complaint will be handled and respective timeframes.</p> <p><b>Stage 1:</b> All issues identified as legitimate complaints will pass through the first of three formal stages in the Complaints Process. Italia Conti's ethos and aim is that all concerns and the majority of complaints will be satisfactorily dealt with at the Stage 1 Front Line Investigation stage.</p> <p>If you wish to proceed to <b>Stage 2</b>, you should confirm this by completing this form and submitting it to <a href="mailto:SpeakUp@italiaconti.co.uk">SpeakUp@italiaconti.co.uk</a> within 5 working days of receiving the outcome of the Stage 1 Frontline Investigation.</p> <p>Please confirm that you have read and understood the definitions, and the policy itself.</p> <p><input type="radio"/> Yes</p>	
<b>Section 2: Complainant Details</b>	
First name	
Surname	
Contact Email address	
Contact mobile number	
Are you currently enrolled on a course at Italia Conti?	
Yes / No	
Yes:	<b>Section 3: Current Student Details</b> -Student Ref details: -Course (drop down list:
No:	
<b>Section 4 - Details of Complaint</b>	
<p>A complaint that legitimately falls within this policy may refer to any aspect of the <u>teaching and learning process</u> or <u>general treatment of the student(s)</u> by members of staff or the institution and will usually be about something that directly impacts the complainant. This presents a wide range of issues, and may include:</p> <ul style="list-style-type: none"> <li>• Italia Conti not meeting obligations including those outlined in course/student handbooks or the student charter;</li> <li>• misleading or incorrect information in prospectuses or promotional material and other information provided by Italia Conti;</li> <li>• unreasonable or substandard delivery of a programme, teaching or administration including, where applicable, delivery by a partner provider;</li> <li>• poor quality of learning resources or facilities;</li> <li>• poor quality services;</li> </ul>	

# ITALIA CONTI

---

- inadequate response to events causing significant disruption to the normal delivery of a course, service or other aspect of the student experience, such as industrial action or a public health emergency;
- misleading, unfair or incorrect processes in policies or procedures relating to financial support, immigration processes or welfare support;
- the standard of service delivered by other organisations or contractors on behalf of the provider that the student feels has affected their learning experience;
- insulting or offensive insensitive or disrespectful actions or use of language from Italia Conti behaviour towards its students, staff or the public, including that which displays insensitivity to a student's an individual's dignity own beliefs or culture. (Students should note, however, that being uncomfortable with or offended by unpopular or controversial concepts or perspectives introduced reasonably as aspects part of an education the programme is not which reasonably introduce views or opinions other than their own, and that may be considered offensive, cannot be seen as grounds for legitimate complaint;
- any other unreasonable behaviour by a member of staff which can be shown to have adversely affected either the professional nature of the staff/student relationship, or the progress of the student on the course.

**Please set out the main circumstances surrounding your complaint, and the rationale for your dissatisfaction with the outcome of Stage 1.**

It is helpful if, in providing your complaint and reasons for progressing to Stage 2, you can adhere to the following guidance:

- Be concise and stick to the facts
- Present the facts in a chronological order, as far as possible
- Try and keep emotion out of your reported complaint, but do explain how you feel it has affected you and any resulting impact

At this step, any relevant member(s) of staff named in the complaint will also be informed that a complaint has been lodged and that it will be investigated and considered based on the evidence provided and discussions deemed appropriate.

Enter your answer:

**Desired Outcomes: What actions do you feel might resolve the problem at this stage?**

Enter your answer:

Submit

## Appendix C: Exemplar Stage 3 Appeal Form:

<b>Stage 3 (Appeal) Complaint Form</b>	
<b>Important information and guidance – please read before submitting your Stage 3 (Appeal)</b>	
<p><b>The Stage 3 (Appeals)</b> procedure is available when the complainant selects to proceed from Stage 2 to Stage 3 of the Complaints Policy.</p> <p>If you wish to proceed to <b>Stage 3</b>, you should confirm this <b>within 5 working days of receiving the outcome of the Stage 2 Investigation</b> using the confirmation below.</p> <p>Your written appeal against any decision reached in Stage 2 should be submitted in writing to <a href="mailto:SpeakUp@italiaconti.co.uk">SpeakUp@italiaconti.co.uk</a> <b>no later than ten (10) working days after the date of the Stage 2 decision letter.</b></p> <p>There is no prescribed format for presenting an appeal, but complainants are asked to be succinct in their reasons for appealing, and not to re-present the facts of the case, since these will already have been recorded.</p> <p>Appeals may be made on one or more of the following grounds</p> <ul style="list-style-type: none"> <li>• <i>A review of the procedures followed at the formal stage</i></li> <li>• <i>A consideration of whether the outcome was reasonable</i></li> <li>• <i>New evidence that could make a difference to the outcome, and which the complainant could not reasonably have provided earlier in the process</i></li> <li>• <i>bias or reasonable perception of bias;</i></li> <li>• <i>remedy or action proposed was unreasonable or disproportionate.</i></li> </ul> <p>If you wish to make an Appeal, you are advised to review the <b>Complaints Policy</b>, found on the website here: <a href="https://www.italiaconti.com/about-us/policies">https://www.italiaconti.com/about-us/policies</a></p>	
1. I confirm that I wish to proceed to Stage 3 (Appeal) of the Complaints Process.	
Please input the date	
<b>Section 2: Complainant Details</b>	
2. First name	
3. Surname	
4. Contact Email address	
5. Contact mobile number	
6. Are you currently enrolled on a course at Italia Conti?	
Yes:	<b>Goes to Current Student Details</b> 7. Student Reference details 8. Course (drop down) Goes to Submit
No:	No: Goes to Submit

Submit

## Appendix D: Unacceptable Behaviour

# ITALIA CONTI

## Policy on Unacceptable Behaviour

Whilst the Italia Conti recognises that a panel hearing is the last stage in the Italia Conti processes for complainants, they recognise their duty to ensure the safety and welfare of students, parents and staff throughout it.

Italia Conti is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who make them. As part of this service, the Complaints Panel would not normally limit its contact with complainants. However, the Complaints Panel does not expect Italia Conti's staff to tolerate behaviour by complainants which is unacceptable; for example, behaviour which is abusive, offensive, or threatening, and it will act to protect staff from that behaviour. This applies to unacceptable behaviour on any part of Italia Conti premises.

If the relevant complaint decision-maker considers that a complainant's behaviour is unacceptable the complainant will be told why their behaviour is deemed to be unreasonable and will be asked to change it. If the unacceptable behaviour continues the relevant complaint decision-maker may act to restrict the complainant's contact with Italia Conti.

### Unacceptable actions and behaviours

These are some of the actions and behaviours of unreasonable and unreasonably persistent complainants which Italia Conti find problematic. It is by no means an exhaustive list and local factors may vary:

# ITALIA CONTI

---

- Foul and abusive language towards staff, other parents, and students.
- Behaviour that staff consider to be harassing and intimidating, including in-person, over the telephone, or any other type of communication.
- Undermining Italia Conti policies by actively encouraging students to ignore staff requests.
- Making unnecessarily excessive demands on the time and resources of staff; for example, by excessive telephoning or emailing numerous staff, writing lengthy complex letters every few days and expecting immediate responses.

The decision to restrict access to or contact with Italia Conti will normally be taken by the relevant complaint decision-maker. Where the restriction may affect a student's access to study, premises, services or support, the decision should involve the Principal or nominee and, where appropriate, the COO, DSL or HR Director.

Any restrictions imposed will be appropriate and proportionate. The options most likely to be considered are:

- Requesting contact in a particular form (for example, letters only) ;
- Requiring contact to take place with a named member of staff;
- Restricting telephone calls to specified days and times; and/or
- Asking the complainant to enter into an agreement about their conduct.

In all cases we will write to tell the complainant why we believe their behaviour is unacceptable, what action we are taking and the duration of that action. Where a complainant continues to behave in a way which is unacceptable, we may decide to terminate contact with that complainant and discontinue any investigation into their complaint. However, the Complaints Panel will seek to limit any detriment to any students who attend Italia Conti, as far as is reasonable within these circumstances.

Where the behaviour is so extreme that it threatens the immediate safety and welfare of Italia Conti's staff, we will consider other options; for example, reporting the matter to the police or taking legal action. In such cases, we may not give the complainant warning of that action.

## Appendix E: Persistent Complainants

# ITALIA CONTI

### Policy on unreasonably persistent complainants

Italia Conti is committed to dealing with all complaints fairly and impartially and to providing a high-quality service to those who make them. As part of this service, it does not normally limit the contact complainants have with the organisation.

However, there are a small number of complainants who, because of their frequent contact with Italia Conti, hinder consideration of their or other people's, complaints. Such complainants are referred to as 'unreasonably persistent complainants' and, exceptionally, the relevant complaint decision-maker may take action to limit their contact with Italia Conti.

### Actions and behaviours of unreasonable and unreasonably persistent complainants

Below are examples of the actions and behaviours of unreasonable and unreasonably persistent complainants. It is by no means an exhaustive list and factors may vary:

- **refusing** to specify the grounds of a complaint, despite offers of assistance with this from the Italia Conti's staff;
- **refusing** to co-operate with the complaints investigation process while still wishing their complaint to be resolved;
- **refusing** to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure's scope;
- **insisting** on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice;

# ITALIA CONTI

---

- **making** what appear to be groundless complaints about the staff dealing with the complaints and seeking to have them replaced;
- **changing** the basis of the complaint as the investigation proceeds and/or denying statements made at an earlier stage;
- **introducing** new information which the complainant expects to be considered and commented on;
- **electronically** recording meetings and conversations without the prior knowledge and consent of the other persons involved;
- **adopting** a 'scattergun' approach: pursuing a complaint or complaints with Italia Conti and, at the same time, with a Member of Parliament /a councillor / the authority's independent auditor/ the Local Authority / local police / solicitors / the Ombudsman / Ofsted;
- **re-submitting previous complaints** with additions or variations made to them in order to present them as new complaints.
- **refusing** to accept the final decision reached in the process, repeatedly arguing the point and complaining about the decision.

The decision to restrict access to or contact with Italia Conti will be taken by the relevant complaint decision-maker and will normally follow a warning to the complainant. Where the restriction may affect a student's access to study, premises, services or support, the decision should involve the Principal or nominee and, where appropriate, the COO, DSL or HR Director. Any restrictions imposed will be appropriate and proportionate. The options we are most likely to consider are:

- requesting contact in a specific form (for example, letters only) ;
- requiring contact to take place with a named member of staff;
- restricting telephone calls to specified days and times, and/or
- asking the complainant to enter into an agreement about their future contacts with us.

In all cases where we decide to treat someone as an unreasonably persistent complainant, we will write to tell the complainant why we believe their behaviour falls into that category, what action we are taking and the duration of that action. We will also tell them how they can challenge the decision if they disagree with it. If we decide to carry on treating someone as

# ITALIA CONTI

an unreasonably persistent complainant and we are still investigating their complaint six months later, we will carry out a review and decide if restrictions will continue.

Where a complainant whose case is closed persists in communicating with us about it, we may decide to terminate contact with that complainant. In such cases, we will read all correspondence from that complainant, but unless there is fresh evidence which affects our decision on the complaint, we will simply acknowledge it or place it on the file with no acknowledgement.

New complaints from people who have come under the unreasonably persistent complainant's policy will be treated on a case-by-case basis.

Review date	Updates
Policy reviewed November 17 <sup>th</sup> , 2025, and approved by the Policy Steering Group.	Updates to the reporting process as a result of revised structure:
	Student-related complaints managed by the Principal
	Staff related complaints managed by the COO
Policy updated 12 <sup>th</sup> May 2026 and approved by the Policy Steering Group	Changes made to <ul style="list-style-type: none"> <li>• clarify the routing of complaints by subject matter: student complaints normally sit with the Principal/nominee, staff-related matters with COO/HR, public complaints with CEO/nominee, and Principal/CEO complaints with the Chair of the Board or Board nominee;</li> <li>• separation of the roles of complaint overseer, Case Officer, Investigating Officer, reviewer and panel, so it's clearer who administers, investigates, oversees and decides;</li> <li>• update to Stage 3 so appeals can be considered either by a single reviewer or an appeal panel, depending on complexity, seriousness, risk and fairness;</li> <li>• addition of safeguards around conflicts of interest and prior material involvement;</li> </ul>

# ITALIA CONTI

	<ul style="list-style-type: none"><li>• clarification that where a student complaint involves staff conduct, any staff process is separate, but the student still receives a complaints outcome;</li><li>• update of the HE routing to reflect Chichester and retained UEL only for any teach-out students;</li><li>• improvement of OIA / Completion of Procedures wording;</li><li>• addition of clearer links to remedies, refunds, compensation and other outcomes where relevant;</li><li>• rephrasing of the unreasonable/persistent complainant sections so restrictions are decided by the relevant complaint decision-maker rather than defaulting to the CEO.</li><li>• Flowcharts updated to reflect revised complaints routing.</li></ul>

**END**