

Christ Theological College

Student Complaints Policy and Procedure

Level 5/5 Microcredentials Provision - Validated by Union School of Theology

Document Control

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Applicable Programmes: CTC Micro-credentials (Level 4/5)

Applies to: All students registered on CTC provision, and applicants complaining about the handling of an application, including those studying or applying from outside the United Kingdom.

Validating Partner: Union School of Theology

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1. Policy Framework and Related Documents

This policy has been developed with reference to the external reference points.¹

This policy should be read alongside the following CTC documents:

- Academic Appeals Policy and Procedure
- Safeguarding Policy
- Code of Conduct
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Admissions Policy
- Quality Assurance Policy
- Programme Handbook for the relevant microcredential

Where any provision of this policy conflicts with the validation agreement between CTC and UST, the validation agreement takes precedence and this policy will be amended at the earliest opportunity.

2. Introduction, Purpose and Definitions

2.1 Christ Theological College (CTC) provides contextually relevant theological education and ministerial training to students in the United Kingdom and beyond. CTC wants every student to have a positive experience. Where a student is dissatisfied, CTC wants to know, to put matters right where it can, and to learn from what has happened.

2.2 The purpose of this policy is to ensure that:

¹ Quality Assurance Agency for Higher Education, *UK Quality Code for Higher Education: Advice and Guidance -Concerns, Complaints and Appeals* (Gloucester: QAA, 2018), 3-8. The Quality Code sets the expectation that providers have fair, accessible and timely processes for handling concerns and complaints, and that outcomes are used to improve the student experience; QAA, *The Revised UK Quality Code for Higher Education* (Gloucester: QAA, 2018), Expectation for Quality and Core Practice on complaints and appeals; QAA, *Characteristics Statement: Microcredentials* (Gloucester: QAA, 2022), 6-9; Office of the Independent Adjudicator for Higher Education, *The Good Practice Framework: Handling Complaints and Academic Appeals* (Reading: OIA, 2016), 8-25; Union School of Theology, *Application Complaints and Review Requests Policy, version 1.3* (December 2025); and Union School of Theology, *Complaints Policy for Non-Academic Issues*; Equality Act 2010.

- complaints are handled consistently, fairly and equitably;
- students are treated with respect and dignity throughout;
- issues are resolved promptly and at the lowest appropriate level;
- students know how to complain, and are not deterred from doing so; and
- the College learns from complaints and improves as a result.

2.3 CTC encourages students to raise concerns early and directly. Most matters are resolved quickly and informally through conversation with the member of staff concerned. Students should not hesitate to approach a tutor, or the Academic Dean for guidance on how to raise a concern.

2.4 The following definitions apply:

Term	Meaning
Complaint	An expression of dissatisfaction by a student about a CTC service, provision, action or lack of action, or about the standard of service provided by or on behalf of CTC, which requires a response.
Concern	A matter raised informally which the student wishes to be addressed but which is not, or not yet, submitted as a formal complaint.
Complainant	The student, or applicant, submitting the complaint.
Academic appeal	A request for review of a decision on assessment, progression or an award. Academic appeals are dealt with under the Academic Appeals Policy and Procedure, not this policy.
Review	A reconsideration of the outcome of a formal complaint, on limited grounds, by a person not previously involved.
Working day	Monday to Friday, excluding UK public holidays and published CTC closure periods.
Calendar day	Every day of the week, including weekends and public holidays.
Complaint	An expression of dissatisfaction by a student about a CTC service, provision, action or lack of action, or about the standard of service provided by or on behalf of CTC, which requires a response.

2.5 Where this document specifies a period, that period runs from the day after the relevant notification is sent. Where a deadline falls on a day on which CTC is closed, it is extended to the next working day.

3. Scope of the Policy

3.1 This policy applies to:

- all students currently registered on CTC provision, whether studying from within or outside the United Kingdom;
- applicants complaining about the handling of an application for admission;
- former students, provided the complaint is submitted within three months of the end of registration;
- all staff, volunteers and associate tutors involved in handling complaints.

3.2 This policy does not apply to the matters listed below, which are dealt with elsewhere:

Matter	Where it is dealt with
A decision on an assessment outcome, module mark, progression or award	Academic Appeals Policy and Procedure
A safeguarding concern, or an allegation of abuse or harm	Safeguarding Policy, referred immediately to the Designated Safeguarding Lead
An allegation of academic misconduct against the student	Academic Integrity and Academic Misconduct Policy
A disciplinary matter concerning the student's own conduct	Code of Conduct
A complaint by a member of staff about employment	Staff Grievance Procedure
A request for personal data or a data protection concern	Data Protection Policy

3.3 Where a matter falls partly under this policy and partly under another, the Academic Dean will determine which procedure applies to each element, explain that determination to the student in writing, and ensure the elements are handled in a coordinated way. Where one element must be resolved before another can be considered, the student will be told this and given an expected timeframe.

3.4 A complaint that discloses a safeguarding concern is referred to the Designated Safeguarding Lead immediately and is dealt with in the first instance under the

Safeguarding Policy. The complaints process is paused only for as long as is necessary and the student is kept informed.

4. Principles of the Policy

4.1 The complaints process is accessible. It is published, written in plain language, available in alternative formats on request, and free of charge to the student.

4.2 The process is fair and impartial. A complaint is not decided by the person whose conduct or decision is complained about, and each subsequent stage is handled by someone not involved at the previous stage.

4.3 The process is timely. Published timescales are set out at Appendix C. Where a timescale cannot be met, the student is told before it expires, given the reason and given a revised date.

4.4 The process is proportionate. Not every complaint requires a formal investigation, and early informal resolution is encouraged wherever it is appropriate and the student agrees.

4.5 The process is confidential, so far as is consistent with investigating the complaint properly. Information is shared only with those who need it. Complete confidentiality cannot be guaranteed, and CTC will explain to the student at the outset what will need to be disclosed and to whom.

4.6 No student will be disadvantaged, or treated less favourably, for making a complaint in good faith. Any suggestion that a student has been disadvantaged for this reason will itself be treated as a serious matter and investigated under this policy and, where staff are involved, the Code of Conduct.

4.7 The process is evidence-based. Findings are made on the balance of probabilities, on the evidence available, and the reasoning is recorded and communicated.

4.8 The process is focused on resolution and improvement. Where CTC has got something wrong, it will say so, apologise, put it right where it can, and change what needs to change.

4.9 Reasonable adjustments will be made for disabled students and students with additional learning needs so that they are not placed at a substantial disadvantage in using this procedure. A formal diagnosis is not required.²

4.10 CTC recognises that many of its students study at a distance, across differing time zones, and that English is an additional language for a proportion of them. Deadlines will be calculated to the end of the day in the student's own time zone; complaints will not be rejected for want of formality of expression; and outcomes will be written in clear language.

4.11 A complaint may be withdrawn without prejudice at any stage (Section 18).

5. Quality Framework: Approach, Deployment, Review, Improvement (ADRI)

5.1 Approach (philosophy and design)

CTC promotes early, informal resolution wherever possible. The complaints system is designed to resolve issues at the lowest appropriate level, avoid unnecessary escalation, support constructive dialogue and ensure procedural fairness. The design is proportionate to the size of the College: three stages, named individual decision-makers rather than standing panels, and recourse to an external reviewer where internal independence cannot be assured.

5.2 Deployment (implementation)

The approach is deployed through a published three-stage process (Sections 10-12), a standard complaint form (Appendix A) and review form (Appendix B), published timescales (Appendix C), and named responsible post-holders (Section 8). The policy is published on the CTC website and virtual learning environment,

² Equality Act 2010, s. 20.

referenced in each Programme Handbook, and explained at induction. Staff who handle complaints are briefed on the procedure at induction and whenever it is materially amended.

5.3 Review (evaluation)

Each complaint is evaluated on its evidence. At institutional level the Registrar maintains a complaints log, and the Academic Dean prepares an annual report analysing volume, category, stage reached, outcome, timescale compliance, remedies and recurring themes. The report is considered by the Governing Board and made available to the validating partner on request.

5.4 Improvement (enhancement)

Complaints data informs improvements to teaching and academic support, to administrative processes, to communication with students, to policy, and to staff development.³ Each agreed action will be recorded with a named owner and a target date, and completion is reported to the Governing Board. Improvement actions arising from complaints are recorded in the CTC action log described at 20.2.

6. What May Be Complained About

6.1 A student may complain about any aspect of the service CTC provides, or fails to provide. Examples include:

- the quality of teaching, tutorial support or supervision;
- the quality, availability or accessibility of learning resources or the virtual learning environment;
- the accuracy of information provided about a programme, its content, its cost or its outcomes;

³ QAA, Concerns, Complaints and Appeals, 8.

- the standard of administrative service, including delays in responding, errors in records, or failures in communication;
- unreasonable delay in returning assessed work or providing feedback;
- the conduct or attitude of a member of staff, a volunteer or an associate tutor;
- a failure to make a reasonable adjustment, or to implement one that had been agreed;
- a failure to follow a published CTC policy or procedure;
- discrimination, harassment or victimisation contrary to the Equality Act 2010;
- the handling of an application for admission.

6.2 A complaint should ordinarily be raised within six weeks of the event complained about, or of the student becoming aware of it. A complaint submitted later will be considered where the student gives a good reason for the delay, which CTC will assess sympathetically, having particular regard to illness, bereavement, and the position of students studying at a distance.

7. What May Not Be Complained About

7.1 The following are not admissible under this policy:

- academic judgement- disagreement with a mark, grade or classification, where criteria were properly applied. Concerns about how an academic decision was reached fall under the Academic Appeals Policy and Procedure;
- a matter that has already been determined under this policy or another CTC procedure, unless new material evidence is available;
- a matter that is or has been the subject of legal proceedings, unless those proceedings have been stayed or adjourned;
- a request that would require CTC to act contrary to law, to the validation agreement, or to a contract with a third party;

- a complaint about a matter that occurred in a previous academic year and was not raised at the time, absent a good reason.

7.2 Where a complaint is not admissible under this policy, the student will be told in writing, given the reason, and directed to the correct route where one exists. A decision on admissibility may itself be reviewed under Section 12.

8. Roles and Responsibilities

8.1 All members of CTC staff are responsible for receiving concerns and complaints, treating them seriously, and dealing with them promptly and courteously. No member of staff should discourage a student from making a complaint.

Role	Responsibility in the complaints process
Student (complainant)	Raises the concern promptly, sets out clearly what has gone wrong and what outcome is sought, provides supporting evidence, and engages with the process.
Member of staff receiving the concern	Seeks to resolve the matter at Stage 1 where it is within their authority; records the concern and the response; escalates promptly where it is not.
Programme Leader	Resolves Stage 1 concerns relating to a programme or module; provides factual information at Stage 2.
Academic Dean	Receives and logs formal complaints; issues acknowledgements; conducts or coordinates the Stage 2 investigation; monitors timescales; maintains the complaints record; issues Completion of Internal Procedures letters.
Academic Dean	Owns this policy; determines which procedure applies where a matter is mixed; appoints the Stage 3 reviewer; handles Stage 2 where the complaint concerns the Registrar; prepares the annual complaints report.
Principal	Provides oversight; acts as Stage 3 reviewer where not previously involved; approves the appointment of an external reviewer.
Designated Safeguarding Lead	Receives any complaint that raises a safeguarding concern and takes it forward under the Safeguarding Policy.
Governing Board	Approves this policy; receives the annual complaints report; assures itself the procedure operates fairly and within

	timescale.
Union School of Theology	Validating partner; receives escalated complaints once CTC's internal procedures are complete, in accordance with UST regulations.

8.2 Where the person who would ordinarily handle a complaint is the subject of it, or was involved in the matter complained about, they take no part in handling it. The Academic Dean substitutes an alternative post-holder and records the substitution. Where the Academic Dean is conflicted, the Principal acts. Where both are conflicted, the Governing Board appoints an external reviewer, who may be a person nominated by the validating partner.

8.3 CTC is a small institution and complete internal separation is not always achievable. Where it is not, CTC will say so openly to the student, explain what has been done to secure impartiality, and record the reasoning. Using an external reviewer is a normal and expected step, not an admission of failure.

9. Structure of the Complaints Process

Stage	Nature	Who handles it	Section
Stage 1	Early and informal resolution	The member of staff concerned, or the Programme Leader	Section 10
Stage 2	Formal complaint and investigation	Academic Dean where the Registrar is involved	Section 11
Stage 3	Request for review	Academic Dean's nominee, Principal, or external reviewer	Section 12

9.1 Students are encouraged, but not required, to attempt Stage 1 first. A student may proceed directly to Stage 2 where the matter is serious, where informal resolution would be inappropriate, or where the student would find it distressing to raise the matter directly with the person concerned.

9.2 Stage 2 must be completed before Stage 3 can be requested, and Stage 3 before any escalation under Section 13.

10. Stage 1: Early and Informal Resolution

10.1 A concern should be raised, as soon as possible and ordinarily within six weeks of the matter arising, with the member of staff or the area concerned. This may be the student's tutor, the Programme Leader, or another relevant member of staff.

10.2 The member of staff will make every reasonable effort to resolve the concern promptly at their own level. Resolution at this stage may involve an explanation, an apology, a correction, or a practical adjustment.

10.3 CTC aims to respond to a Stage 1 concern within 10 working days. Where the matter cannot be resolved in that period, the student will be told and either given a revised date or advised to proceed to Stage 2.

10.4 Where the concern is about a member of staff and the student does not feel able to raise it with that person directly, the concern should be raised with the Programme Leader or the Academic Dean instead.

10.5 Concerns raised verbally, including in an online class or a telephone conversation, should be confirmed by the student in writing to the relevant member of staff so that there is a clear record of what is being raised.

10.6 A brief written record is kept of every Stage 1 concern and its resolution, recording the date, the substance of the concern, the response given and whether the student indicated they were satisfied. These records form part of the complaints log described at 22.1.

10.7 Stage 1 does not extend the time limit for submitting a formal complaint. A student who remains dissatisfied should proceed to Stage 2 within 10 working days of the Stage 1 response.

11. Stage 2: Formal Complaint

11.1 How to submit

A formal complaint is made by completing the Student Complaint Form at Appendix A and submitting it, with any supporting evidence, to the Registrar at [insert complaints email address]. Where the complaint concerns the Registrar, it should be submitted to the Academic Dean.

11.2 Deadline

A formal complaint should be submitted within 10 working days of the Stage 1 response, or, where Stage 1 was not used, within six weeks of the matter complained about. Later submissions will be considered where a good reason for the delay is given.

11.3 Acknowledgement

The Registrar will acknowledge the complaint in writing within 5 working days, confirm CTC's understanding of what is being complained about and what outcome is sought, name the investigating officer, and state the date by which a response can be expected.

11.4 Investigation

The investigating officer will:

- a. establish what is being complained about and what outcome the student seeks;
- b. gather and review the relevant evidence, including records, correspondence and system logs;
- c. give any member of staff whose conduct is questioned a fair opportunity to respond;

- d. interview witnesses where necessary and keep a record;
- e. check whether CTC followed its own published policies and procedures;
- f. reach findings on the balance of probabilities; and
- g. determine an appropriate remedy where the complaint is upheld in whole or in part.

11.5 Meetings

The investigating officer may invite the student to a meeting, held online where the student studies at a distance. The student may be accompanied by a supporter in accordance with Section 19. A record of the meeting is kept and a copy provided to the student.

11.6 Outcome and timescale

CTC aims to provide an initial response within 10 working days of receipt and a full written outcome within 20 working days of receipt. The written outcome will set out: what was complained about; what was investigated and what evidence was considered; the findings and the reasons for them; whether the complaint is upheld, partly upheld or not upheld; any remedy and how it will be implemented; and the right to request a review under Section 12, with the deadline for doing so.

Where a complaint is complex, involves several people, or requires evidence from a third party, the 20-day period may be extended. The student will be told before it expires, given the reason and given a revised date, and will be updated at least every 10 working days thereafter.

12. Sate 3: Request for Review

12.1 Purpose

The review stage is not a re-investigation of the complaint. Its purpose is to consider whether the formal stage was conducted properly and whether the outcome reached was reasonable.

12.2 Grounds for review

A review may be requested only on one or more of the following grounds:

- CTC did not follow its published procedures at the formal stage;
- the outcome reached was not reasonable in all the circumstances;
- new material evidence is available which the student was unable, for valid reasons, to provide earlier, with an explanation of why it was not provided.

Disagreement with the outcome, without more, is not a ground for review.

12.3 How and when to request a review

The student must complete the Request for Review of Complaint Outcome Form at Appendix B and submit it to the Registrar within 10 working days of receiving the Stage 2 outcome. The request will be acknowledged in writing within 5 working days.

12.4 Who conducts the review

The review is conducted by a person not previously involved in the matter, appointed by the Academic Dean. This will ordinarily be a nominee of the Academic Dean or the Principal. Where internal independence cannot be assured, the Academic Dean will, with the approval of the Principal, appoint an external reviewer, who may be a person nominated by the validating partner, and will record the reason.

12.5 What the reviewer considers

The reviewer will address, and record findings on, each of the following:

- Were CTC's published procedures followed at the formal stage?
- Was the outcome reasonable on the evidence available?
- Has the student been given clear and sufficient reasons for the Stage 2 outcome?
- Where new evidence is submitted, is there a valid reason it was not provided earlier, and is it material?

12.6 Review outcomes

The reviewer may:

- dismiss the request for review and uphold the Stage 2 outcome;
- uphold or partly uphold the request for review;
- refer the matter back for reconsideration, with directions as to what must be reconsidered and why;
- propose a settlement, offer an apology, or recommend that specified steps be taken to address the issue and to prevent recurrence.

12.7 Timescale

The outcome of the review will be communicated in writing, with reasons, within 20 working days of receipt of the review request. Where the review is not upheld, the Registrar issues a Completion of Internal Procedures letter at the same time, and in any event within 5 working days of it.

13. Completion of Internal procedures and External Escalation

13.1 CTC's internal procedures are complete when the Stage 3 review outcome has been issued, or when the student has allowed the Stage 3 deadline to pass without requesting a review.

13.2 At that point the Registrar issues a Completion of Internal Procedures letter setting out the substance of the complaint, the stages followed, the outcome at

each stage, the reasons for the final decision, and the date internal procedures were completed.

13.3 A student who remains dissatisfied once internal procedures are complete may escalate the matter to Union School of Theology as validating partner, in accordance with UST's own regulations and within the time limit UST specifies. The Completion of Internal Procedures letter must accompany any such escalation.

13.4 UST contact point for escalated complaints: Dean of School, Union School of Theology dean@ust.ac.uk.

13.5 Any avenue of external review beyond UST is governed by UST's own regulations and validation arrangements. CTC does not operate an independent external review scheme of its own, and students should not approach an external body before CTC's internal procedures are complete and a Completion of Internal Procedures letter has been issued.

13.6 Nothing in this policy affects a student's right to seek independent legal advice, to raise a matter with a statutory regulator where one has jurisdiction, or to report a criminal matter to the police at any time.

13.7 CTC will cooperate fully and promptly with any request for information from UST arising from an escalated complaint, and will implement any remedy directed by UST under the validation agreement.

14. Outcomes and Remedies

14.1 A complaint may be upheld, partly upheld or not upheld. In each case the student will be given the reasons.

14.2 Where a complaint is upheld in whole or in part, the remedies available include:

- an explanation of what went wrong and why;
- an apology;

- correction of a record or of information provided;
- provision of the service that was not provided, or its provision to the required standard;
- an extension, a deferral or an additional assessment opportunity, where the fault affected the student's ability to study or to be assessed;
- a change to a policy, procedure or practice, with a named owner and target date;
- additional training or support for the member of staff concerned;
- a financial remedy, including a refund or a waiver of a fee, where a charge was wrongly made or a service was not delivered;
- referral of a staff conduct matter to the appropriate disciplinary procedure.

14.3 The aim in selecting a remedy is, so far as reasonably possible, to place the student in the position they would have been in had the fault not occurred.⁴ A remedy will not be withheld solely because it is administratively inconvenient.

14.4 A financial remedy is approved by the Principal, recorded with reasons, and reported to the Governing Board in the annual complaints report.

14.5 Where a remedy is agreed, CTC will confirm in writing what will be done, by whom and by when, and will confirm to the student once it has been implemented.

14.6 Where an investigation reveals that other students have been affected by the same fault, CTC will take corrective action for those students whether or not they have complained, and will inform them.

15. Complaints Involving Staff Conduct, safeguarding or Harrassment

15.1 A complaint that alleges abuse, harm or risk of harm to a child or an adult at risk is referred immediately to the Designated Safeguarding Lead and dealt with under the Safeguarding Policy. It is not held over to be dealt with through the complaints timescales.

⁴ OIA, Good Practice Framework, 26–28, on proportionate remedies.

15.2 A complaint alleging harassment, sexual misconduct, bullying or discrimination will be handled sensitively and, wherever possible, by an investigating officer of the complainant's choosing as to sex where the complaint concerns sexual misconduct.

15.3 Where a complaint concerns the conduct of a member of staff, a volunteer or an associate tutor, the complaints investigation establishes the facts. Any disciplinary consequence is then handled under the relevant staff procedure, which is separate and confidential. The complainant will be told that the matter has been referred and that action has been taken, but will not ordinarily be told the detail of any disciplinary outcome.

15.4 Where a complaint discloses a possible criminal offence, CTC will advise the complainant of their right to report the matter to the police, will support them in doing so if they wish, and will consider whether CTC itself must make a report. Where a police investigation is under way, CTC's internal process may be paused, and the complainant will be told why and kept informed.

15.5 Where a complaint concerns spiritual abuse, or the misuse of religious authority or teaching to control, coerce or harm, CTC will treat it as a serious matter and will handle it under the Safeguarding Policy alongside this procedure.

16. Anonymous, Third-Party and Group Complaints

16.1 CTC will consider an anonymous complaint where there is sufficient information to do so, but cannot investigate fully, cannot report an outcome to the complainant, and cannot offer a personal remedy. Anonymous complaints are logged and used to inform the annual report.

16.2 A third-party complaint, made on a student's behalf by a family member, minister or sending organisation, will be considered only with the student's written consent, which CTC will seek before proceeding.

16.3 A group complaint may be submitted where the same matter affects several students. The group must nominate one point of contact, and each member must confirm in writing that they wish to be included. A single investigation is conducted and a single outcome issued, but each student receives the outcome individually and each retains an individual right of review.

17. Vexatious Complaints and Unacceptable Behaviour

17.1 CTC will not investigate a complaint it considers frivolous or vexatious. Such a decision is taken by the Academic Dean, recorded with reasons, and communicated in writing with an explanation and with the right to request a review under Section 12.

17.2 A complaint is not vexatious merely because it is persistent, strongly expressed, inconvenient, or has been unsuccessful before. A complaint may be treated as vexatious where, for example, it repeats a matter already determined without new evidence, is pursued in a way designed principally to cause disruption or distress, or is knowingly based on false information.

17.3 Where a complaint is found to have been made knowingly on false information, or with malicious intent, the matter may be referred under the Code of Conduct. A complaint that is not upheld is not for that reason malicious, and no student will face any consequence for making an unsuccessful complaint in good faith.

17.4 Where a complainant behaves abusively or threateningly towards staff, CTC may restrict the manner of contact, for example by requiring correspondence through a single named point of contact – while continuing to deal with the substance of the complaint. Any such restriction is set out in writing, with reasons, and is reviewed after three months.

18. Withdrawal of a Complaint

18.1 A complaint may be withdrawn at any stage by notifying the Registrar in writing. The decision made at the previous stage stands and the case is closed.

18.2 Withdrawal is without prejudice to the student. However, where a withdrawn complaint raises a safeguarding concern, or a concern about the safety or wellbeing of others, CTC may need to continue to act on the information, and will explain this to the student.

19. Support for Students

19.1 A student may be accompanied or supported at any meeting under this procedure by one person of their choosing. The supporter must be independent of the circumstances giving rise to the complaint.

19.2 The supporter may be a fellow student, a friend, a family member, a minister or a representative of the student's sending church or organisation. The supporter is there to support the student rather than to advocate in their place, although the student may ask them to speak on a particular point.

19.3 Students may seek guidance on how the procedure works from the Registrar. The Registrar will explain the process but will not advise on the merits of a complaint.

19.4 Where a student appears distressed, or where the matters raised suggest a welfare concern, staff will offer pastoral support or signpost to external support alongside the complaint. Engagement with pastoral support is voluntary and has no bearing on the outcome.

19.5 Staff who are the subject of a complaint are also entitled to support, to be told what is alleged, and to a fair opportunity to respond before findings are made.

20. Records, Confidentiality and Data Protection

20.1 CTC maintains a record of every formal complaint, comprising the complaint form, supporting evidence, correspondence, notes of meetings and interviews, the evidence considered, the findings and reasoning, the outcome issued and any remedy implemented.

20.2 Complaint records are held in a restricted-access folder within CTC's document management arrangements, separate from students' general academic files. Access is limited to the Registrar, the Academic Dean, the Principal and any person appointed to handle the specific complaint. Access permissions are set by the Registrar and recorded in the CTC Information Asset Register, which records for each record type the owner, the location, who has access, the lawful basis for processing and the retention period.

20.3 Complaint records are retained for six years from the conclusion of the complaint and then securely destroyed, save where a longer period is required by the validating partner or by law. Records relating to safeguarding are retained under the Safeguarding Policy, which specifies a longer period.

20.4 Personal data is processed in accordance with the Data Protection Act 2018 and the UK GDPR. Students may request a copy of the personal data CTC holds about them by contacting the Registrar.

20.5 The fact that a student has made a complaint is not disclosed to referees, sponsors or sending churches without the student's written consent, and is not recorded on the student's academic transcript.

20.6 Anonymised complaints data may be shared with the validating partner and used for the purposes described in Section 22.

21. Equality, Diversity and Inclusion

21.1 CTC will not discriminate against any student in the operation of this procedure on the basis of a protected characteristic under the Equality Act 2010.

21.2 Reasonable adjustments will be made so that disabled students are not placed at a substantial disadvantage in making or pursuing a complaint. Adjustments may include extended deadlines, alternative submission formats, support in articulating the complaint, or holding meetings in a different medium.

21.3 This policy is subject to an equality impact assessment at each review, the outcome of which is recorded in the version control table.

21.4 Complaints data is monitored, so far as small numbers allow without compromising anonymity, for patterns indicating differential experience between groups of students. Where numbers are too small for meaningful disaggregation, the Academic Dean records that fact rather than publishing potentially identifying data.

22. Monitoring, reporting and Enhancement

22.1 The Registrar maintains a complaints log recording, for each complaint: the date received, the category, the stage reached, the outcome, elapsed time at each stage, any remedy implemented, and any improvement action arising. Stage 1 concerns are logged in summary form.

22.2 The Academic Dean prepares an annual complaints report analysing volume, category, stage reached, outcomes, timescale compliance, remedies, financial remedies approved, themes identified and actions taken. The report also records progress against improvement actions agreed in the previous year.

22.3 The annual report is considered by the Governing Board, which satisfies itself that the procedure has operated fairly and within timescale, and is made available to the validating partner on request or as required by the validation agreement.

22.4 A nil return is itself reported. An absence of complaints is not assumed to indicate an absence of problems, and the Academic Dean will consider whether students are sufficiently aware of the procedure and confident to use it.

22.5 Students are informed, at least annually and through the virtual learning environment, of the themes arising from complaints and of what has changed as a result. This closes the feedback loop and demonstrates that complaining is worthwhile.

23. Responsibilities, Approval and Review

23.1 The Academic Dean owns this policy and is responsible for its operation, for the annual report, and for proposing amendments.

23.2 The Governing Board approves this policy and any subsequent amendment.

23.3 This policy is reviewed annually, and additionally whenever there is a material change in the requirements of the validating partner, in relevant legislation or in national guidance.

23.4 Amendments required to comply with the validation agreement may be made by the Academic Dean between scheduled reviews and reported to the Governing Board for ratification at its next meeting.

24. Policy Communication

24.1 This policy is published on the CTC website at www.ctcollege.org and on the virtual learning environment.

24.2 The policy is referenced in each Programme Handbook and explained at student induction. A record of induction coverage is retained by the Registrar.

24.3 Staff and associate tutors are briefed on this policy at induction and whenever it is materially amended, and a record of that briefing is retained.

24.4 Every effort will be made to respond to a request for this policy in an alternative format.

Appendix A: Student Complaint Form

Please complete all relevant sections and submit the form, with any supporting evidence, to the CTC dean of students at Matthew.reifsnider@ctcollege.org. Please read Sections 6 and 7 of the policy first, to check that your complaint is admissible under this procedure.

Section 1: Your Details

Full name	
Student number (if applicable)	
Programme / microcredential	
Email address	
Contact number	
Country / time zone of study	
Are you a current student, a former student, or an applicant?	
Do you have a disability or additional learning need you would like us to take into account? If yes, please describe any adjustment that would assist you.	

Section 2: Have you raised this informally?

Have you raised this concern informally first (Stage 1)?	☐ Yes ☐ No
If yes, with whom and when?	
What response did you receive?	
If no, please explain why you are going straight to a formal complaint	

Section 3: What is your complaint about?

Category (tick all that apply)	
☐ Teaching, tutorial support or supervision	☐ Learning resources or the VLE
☐ Information provided about a programme	☐ Administrative service or delay
☐ Conduct or attitude of a member of staff	☐ Reasonable adjustment not made or not implemented
☐ Failure to follow a CTC policy	☐ Discrimination, harassment or victimisation
☐ Handling of an application	☐ Other (please specify below)
Date of the event(s) complained about	
If more than six weeks have passed, please explain the delay	

Section 4: Details of your complaint.

Please set out clearly what happened, when, who was involved, and what you say went wrong. Please keep to the facts and continue on a separate sheet if necessary.

Section 5: Supporting Evidence

Document	Date	What it shows

Section 6: What outcome are you seeking

Section 7: Suggestions for changing

Section 8: Support and Declaration

Do you have someone supporting you with this complaint? You may bring a supporter to any meeting (Section 19 of the policy).

Supporter's name and relationship to you (if any)	
I confirm the information given is accurate to the best of my knowledge.	
Signed (student)	
Date	

Appendix B: Request for Review of complaint Outcome

Use this form only if you have received the outcome of a formal complaint (Stage 2) and remain dissatisfied. Submit it to the Registrar within 10 working days of receiving the Stage 2 outcome. Please read Section 12 of the policy first.

Section 1: Your details

Full name	
Student number (if applicable)	
Programme / microcredential	
Email address	
Date you received the Stage 2 outcome	
Do you require any adjustment to take part in the review?	

Section 2: Grounds for Review

A review is not a re-investigation. Disagreement with the outcome is not by itself a ground.

Ground	Tick
CTC did not follow its published procedures at the formal stage	☐
The outcome was not reasonable in all the circumstances	☐
New material evidence is available which I could not, for valid reasons, provide earlier	☐

Section 3: Explanation

Please explain how the ground(s) you have ticked apply in your case.

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Section 4: New evidence (if applicable)

What is the new evidence?	
Why could it not be provided earlier?	
Why is it material?	

Section 5: Outcome sought

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Section 6: Declaration

Signed (student)		Date	
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Appendix C: Summary of Timescales

Timescales are expressed in working days unless otherwise stated. A working day is Monday to Friday, excluding UK public holidays and published CTC closure periods.

Step	Who	Timescale
Raise a concern (Stage 1)	Student	As soon as possible, ordinarily within 6 weeks of the matter arising
Respond to a Stage 1 concern	Member of staff / Programme Leader	Within 10 working days
Submit a formal complaint (Stage 2)	Student	Within 10 working days of the Stage 1 response, or 6 weeks of the matter
Acknowledge the formal complaint	Registrar/Academic Dean	Within 5 working days of receipt
Initial response to the formal complaint	Investigating officer	Within 10 working days of receipt
Full written outcome of the formal complaint	Investigating officer	Within 20 working days of receipt
Request a review (Stage 3)	Student	Within 10 working days of the Stage 2 outcome
Acknowledge the review request	Registrar/Academic Dean	Within 5 working days of receipt
Communicate the review outcome	Reviewer	Within 20 working days of receipt of the review request
Issue Completion of Internal Procedures letter	Registrar/ Academic Dean	With the review outcome, and in any event within 5 working days

Escalate to Union School of Theology (UST)	Student	As specified in UST regulations
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**Where any timescale cannot be met, CTC will tell the student before it expires, explain why, give a revised date, and update the student at least every 10 working days thereafter. Timescale compliance is monitored and reported annually under Section 22.*

Version Control

Version	Author	Date	Reason for change	EIA check	Approval
1.0	Academic Dean	July 2026	Policy created for microcredential validation.		Governing Board
2.0	Academic Dean	[insert]	Claims of alignment with sector expectations replaced with cited external reference points. Direct escalation to an external adjudicator removed throughout; escalation routed to Union School of Theology as validating partner, with UST contact details given. General reference to storage “within the QA system” replaced with a specific description of where complaint records are held, who may access them, and how long they are retained. Stage 1 correctly titled as informal resolution. Roles, grounds, timescales, remedies, group and anonymous complaints, vexatious complaints, support, equality and monitoring provisions expanded. Complaint and review forms and a timescale summary added.	(insert)	(Insert)
			Next review: insert		

Amendments at version 2.0 respond directly to feedback received from the validating partner on version 1.0, specifically: that a claim of alignment with UK higher education expectations requires supporting evidence; that references to escalation to an external adjudicator should be deleted and the validating partner's details given instead; and that the statement that records are "stored securely within the QA system" required explanation