



Key Personnel:

- The Principal**
- The Dean**
- The Senior Tutor**
- The Director of Operations**
- Chair of Governing Body**

The following policies should also be consulted:

- General Principles Concerning the Use of College Policies**
- Harassment Policy, as appropriate**
- Disciplinary Policy, as appropriate**
- Policy on Staff/Student relationships, as appropriate**

Abbreviations used: CH: Case Handler

This policy is to be read in conjunction with the Regents Park College Safeguarding Policy. Safeguarding referrals will be made within 24 hours where the nature of a grievance gives rise to concerns about the safeguarding or protection of an affected party, or where concerns about the 'suitability' of an individual to work in a position of trust arise. Matters that suggest potential criminality will be referred to the Police. Where affected parties require external support services, beyond the skill or resources of the University, external referrals will be made promptly.

A. Introduction

1. This document lays out procedures for employees of the College who wish the College to consider and, if necessary, respond to serious dissatisfaction with academic, financial, or other aspects of College life (for the purposes of this policy, 'an aggrieved person'). It normally applies to cases that do not at first involve harassment or disciplinary procedures, which are dealt with under the College's Harassment Policy and Disciplinary Policy, though such procedures may follow as one possible outcome of this process.
2. A member of staff may begin the procedure informally and then choose to transfer to the formal process, or proceed directly to a formal complaint.
3. Aggrieved persons/complainants may at any stage of this procedure be accompanied for support by a friend or an adviser.
4. Rumours or unattributed remarks or narratives will not be considered as part of the factual information in any complaint.
5. Any initial approach to a College Officer, senior member of staff, or line manager will be in confidence, and the aggrieved person/complainant will be advised of how far further action will involve others knowing their identity.
6. Any action (informal, formal, final) taken under the terms of this Policy should normally take place face-to-face. However, under exceptional circumstances, it may need to take place remotely, via an online platform such as Microsoft Teams or its equivalent.



7. The Procedures outlined in the Policy will be followed with due regard to the College Policies on Confidentiality and the requirements of Data Protection legislation.
8. In the case of employees, the decision of Governing Body is final.

B. Roles and Communications

1. Communications will be established as laid out in General Principles Concerning the Use of College Policies, paragraphs 2-14 inclusive.
2. Any person who is in the employment of the College who believes that they have a legitimate grievance against a colleague, or student member of the College, should normally, in the first instance, discuss their grievance with their line manager, or relevant College Officer, as appropriate.
3. Concerns about college policies or employment matters should normally be first addressed informally with line managers, or other suitable members of staff.
4. The Case Handler (CH) will normally be the aggrieved person's line manager, or relevant College Officer, as appropriate.
5. The appropriate College Officers who will normally handle complaints (the Case Handlers) are:
 - 5.1 For matters involving academic-related staff: the Senior Tutor;
 - 5.2 For matters involving administrative and domestic College staff, catering or accommodation: the Director of Operations;
 - 5.3 For financial matters: the Director of Finance;
 - 5.4 For matters involving Undergraduate student members: the Dean, or the Senior Tutor;
 - 5.5 For matters involving Postgraduate student members: the Dean, or the Tutor for Graduates;
 - 5.6 For matters involving Ministerial Students: the Dean, or the Director of the Pastoral Studies Programme.
 - 5.7 For matters involving one of the College Officers listed 5.1-5.6 above: the Principal or Acting Principal;
 - 5.8 For matters involving the Principal or Acting Principal, the Chair of Governing Body.
6. If a grievance or complaint is against an employee's line manager, they may approach any of the College Officers listed above, as appropriate.
7. A grievance or complaint against a student member of the College will normally be dealt with under the Student Disciplinary Code, and the aggrieved person/complainant should normally approach the Senior Tutor or the Dean, in the first instance.
8. Any person who is in the employment of the College who believes that they have a legitimate grievance against a colleague and considers the circumstances sufficiently serious, may submit a written complaint under the formal procedure set out in Section D to the relevant College Officer, without going through the informal procedure set out in Section C.



9. Complaints, formal or informal, may be withdrawn; but in some circumstances the CH may decide to act upon the information received and conduct an investigation.
 - 9.1 If the CH, Principal or other College Officer considers that a complaint is withdrawn under pressure (and this is especially the case where the matter is serious) they should ensure that the matter is independently investigated. See Section D below for details of the investigation procedure.
 - 9.2 If the person who is the subject of a grievance/complaint responds to the aggrieved person/complainant in a way that may constitute bullying or harassment, such a response will also be investigated under the Harassment Policy.
10. At any stage in this procedure, an aggrieved person/complainant may seek advice and support from the Head of Welfare, the Harassment Officers, the Safeguarding Officer, or the Women's Officer, although none of these persons has formal responsibilities under this Policy.
11. The need to avoid unnecessary delay in the resolution of complaints is stressed. Normally the College will seek to resolve formal complaints within six weeks, though this may not always be possible.

C. Informal Procedure

1. Anyone who believes that they have been poorly treated by a colleague, or who believes that they have a grievance against another member of staff, is encouraged to address the issue informally with that colleague before proceeding with any of the further steps listed below.
2. The aggrieved person may seek support and advice in making this initial contact from their line manager, the relevant College Officer (see paragraph B.5 above), or other suitable members of staff, as appropriate (see B.10 above).
3. If the aggrieved person does not feel that the issue has been satisfactorily addressed by such initial contact, or they are unwilling to make such contact, they should raise the grievance with their line manager, or relevant College Officer (see B.5), as appropriate.
4. Any member of staff who believes they have a grievance against a student member, should normally discuss this with the Senior Tutor, or Dean in the first instance.
5. The CH will support and advise the aggrieved person in achieving an informal resolution that will encourage discussion and understanding of the issue, and reconciliation between individuals, if appropriate. The aggrieved person can be accompanied at any stage in this process by a colleague or friend, from within the College environment.
6. It is very important that this stage is not protracted and that the CH, or other suitable person approached, understands their role is advisory and conciliatory, and makes clear that they are not an arbitrator. However, within these constraints, they may, with the permission of the complainant, speak to both sides to the complaint.
7. With the consent of the aggrieved person, the CH may use mediation or conciliation, if appropriate.



8. Mediation and conciliation

- 8.1 The following procedure assumes that informal resolution (C.1-6) has been unsuccessful, was inappropriate given the nature of the complaint, or has not been chosen by the aggrieved person.
- 8.2 In some situations, it may be appropriate to ask the parties to consider entering into a mediation or conciliation process. Although mediation or conciliation may be attempted at any time before or after a formal investigation, it may be particularly helpful if it is considered at an early stage before any formal procedure is invoked.
- 8.3 An experienced mediator or conciliator acceptable to both parties will normally be nominated by the CH, who may seek advice from the College's Human Resources Officer, or University's Director of Human Resources if appropriate.
- 8.4 The mediator or conciliator will meet with the parties separately and as soon as practicable to begin to seek a resolution.
- 8.5 The normal expectation is that resolution would be achieved within 20 working days of the initial meetings with the parties (although this time limit may be extended by agreement). Any agreed outcome will normally be recorded in writing.
- 8.6 All those involved in the mediation or conciliation process must maintain appropriate confidentiality.

D. Formal Procedure: Stage 1

1. If informal action, and/or mediation and conciliation have not achieved a resolution, or they would not be appropriate given the nature of the complaint, the aggrieved person should normally make a formal written complaint. The aggrieved person does not need to have initiated or completed the informal procedure before making a formal complaint.
2. When it is decided that a formal complaint is to be made, it should be made in writing to the aggrieved person's line manager, relevant College Officer, or CH, as appropriate (see B.5 above).
3. In any written submission the complainant should set out as clearly and succinctly as possible:
 - a. The nature of the grievance and/or behaviour that they are concerned about;
 - b. the effect of this behaviour on them; and
 - c. the resolution they are seeking;
 - d. the complaint should include dates and details of any relevant persons and/or witnesses to any incidents referred to in the complaint, together with any relevant documentary and/or electronic/digital information;
 - e. If appropriate, the complainant should explain what steps, if any, have been taken to achieve a resolution.
4. The CH, College Officer, or line manager (as appropriate) will:
 - a. seek to offer sympathetic and confidential advice; and/or
 - b. try to find a remedy, or a reconciliation (in cases where relations have broken down between individuals, and the complainant does not object to this course).



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5. If the CH, College Officer, or line manager is unable to resolve the problem to the satisfaction of the complainant, the complainant may write to the Principal or Acting Principal, or for a complaint that involves the Principal, to the Chair of Governing Body).

E. Formal Procedure: Stage 2

1. On receipt of a complaint as outlined in D.5, the Principal or Acting Principal (or for a complaint that involves the Principal, the Chair of Governing Body and Council) will consider the matter should be taken further.
2. If the Formal Procedure moves from Stage 1 to Stage 2, the CH would normally be the Principal, or the Chair of Governing Body, as appropriate.
3. The Principal, or Chair of Governing Body (as appropriate) will appoint a member of staff to investigate the complaint. The investigator will be, so far as is possible, someone who has not previously been involved in the case.
4. The purpose of the investigation is to establish the relevant information in connection with the circumstances that that have initiated the formal complaint.
5. The investigation should be concluded as soon as is reasonably practicable. Wherever possible this will normally be within six weeks of the date of the written complaint.
6. The investigator will meet with the complainant in order to confirm the details of the complaint.
7. The investigator will keep a written record of their meeting (or ask a colleague to attend in order to do this) which the complainant will see and have the opportunity to comment upon.
8. The investigator will produce a written record of their meeting which the complainant will see and have the opportunity to comment upon.
9. The investigator will then inform the member of staff against whom the complaint has been made – giving them a copy of the complaint before or at a meeting with them.
10. The investigator will produce a written record of their meeting (or ask a colleague to attend in order to do this) with the subject of the complaint, which the staff member against whom the complaint has been made will see and have the opportunity to comment upon.
11. The investigator may interview other people as relevant and appropriate.
12. The investigator will then report to the CH recommending a course of action, which may include one or more of the following:
 - a. An informal or formal warning to the member of staff who is the subject of the complaint;
 - b. Further disciplinary action against the member of staff who is the subject of the complaint;



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- c. Measures to be adopted by the member of staff who is the subject of the complaint, or the College, to avoid a recurrence of the circumstances of the complaint, e.g. a course of training;
 - d. Dismissal of the complaint.
 13. The Principal, or Chair of Governing Body will act upon the investigator's report as they deem appropriate; the Principal may refer the investigator's report to the Governing Body, if appropriate.
 14. At the conclusion of Formal Procedure Stage 2, the complainant, and the subject of the complaint shall be notified that the procedures under this code have been followed, whether or not the complaint has been upheld, and on what grounds. However, due regard to confidentiality, and Data Protection legislation will mean that a complainant cannot be informed of the outcome.
 15. If at the conclusion of Formal Procedure Stage 2 (D.1-11, above) the investigator concludes that the complaint was malicious or vexatious, they shall so report to the CH, Principal or Chair of Governing Body who shall take such steps as are appropriate.

F. Records.

1. The College and all those involved in this process must comply with the principles of the Data Protection Act 2018 . These include ensuring that personal data is accurate and up-to-date, held securely, and not kept for longer than necessary.
2. Those interviewed in the course of any investigation will be asked to review the notes of their individual discussions with the investigator as soon as is reasonably possible in order to comment on any inaccuracies or omissions.
3. Each College Officer listed at B.5 will keep a register of formal complaints made in an academic year, and a summary of numbers and outcomes will be collected by the Principal and submitted to Governing Body and the Equality Committee.
4. The registers will indicate how many formal complaints have been registered, and what stage they reached (Stage One, Stage Two, still unresolved, withdrawn).

G. Appeal

If the complainant remains dissatisfied by the conclusion of the complaint process (Section D) they have the right to appeal to the Chair of Governing Body (or, if the complaint has been handled by the Chair of Governing Body, to the Deputy Chair) who will ask two independent members of Governing Body to form a panel with the Chair (or Deputy Chair) to consider the matter and determine an outcome.



H. Completion of Procedures

1. At the end of complaints, appeals, or internal procedures covered by the College policies, a Completion of Procedures letter will normally be sent to the person who is the subject of an internal procedure, and (if appropriate) to the person who has made the complaint.

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