
THE OXFORD CENTRE FOR RELIGION AND PUBLIC LIFE

C2 STUDENT COMPLAINTS PROCEDURE

1. Purpose

OCRPL is committed to resolving student concerns fairly, promptly and proportionately. This procedure explains how students may raise concerns and formal complaints about services or matters for which OCRPL is responsible, how those complaints will be investigated and reviewed, and how OCRPL will use complaint outcomes to improve its provision.

2. Scope

This procedure applies to current students and, where appropriate, former students in relation to:

- a. teaching, supervision, administration, online learning services, student support or other services provided by or on behalf of OCRPL;
- b. inaccurate or misleading information provided by OCRPL about a programme, fee, service or student-facing commitment;
- c. unreasonable delay, communication failure or failure to provide an agreed OCRPL service;
- d. the conduct of OCRPL staff, faculty, volunteers or persons acting on OCRPL's behalf, unless another specialist procedure is more appropriate; and
- e. services involving a partner institution where OCRPL has responsibility for the matter being complained about.

Where a complaint concerns an academic decision, assessment, progression, award, certification or another matter controlled by a partner or awarding university, OCRPL will direct the student to the appropriate partner procedure and will assist with routing where reasonably possible.

3. Legal and good-practice framework

OCRPL operates this procedure as part of its responsibilities as an Independent Alternate Provider of Higher Education (IAPHE) and charitable education organisation. The procedure is intended to reflect applicable law and principles of fair complaint handling, including:

- a. the Consumer Rights Act 2015;
- b. the Digital Markets, Competition and Consumers Act 2024 and applicable consumer-protection requirements;
- c. the Equality Act 2010, including reasonable-adjustment obligations where applicable;
- d. applicable UK data-protection law and OCRPL's current approved privacy arrangements;
- e. principles of procedural fairness, impartiality, proportionality and natural justice; and
- f. the contractual and procedural requirements of relevant partner or awarding institutions where responsibility lies with them.

Where OCRPL later subscribes to an independent Alternative Dispute Resolution (ADR) or external review scheme applicable to student complaints, students will be informed clearly of that route. OCRPL will not state or imply membership of an external redress body unless that membership or arrangement is current and applicable.

4. Core principles

- a. Accessible and clear: students should be able to understand how to raise a concern or complaint.
- b. Fair and impartial: formal decisions should be made by persons without material prior involvement where reasonably practicable.
- c. Confidential: information will be shared only as reasonably necessary for fair handling, safety, legal compliance or implementation of an outcome.
- d. Inclusive: OCRPL will consider reasonable adjustments and appropriate support.
- e. Proportionate: the process used should reflect the seriousness and complexity of the issue.
- f. Timely: complaints should progress without avoidable delay and students should be informed about material delays.
- g. No disadvantage for complaining: a student will not be penalised merely for raising a concern or complaint in good faith.
- h. Learning and improvement: themes, remedies and recurring issues will be reviewed so that appropriate improvements can be made.

5. Feedback and early resolution

Students are encouraged to raise concerns as soon as reasonably possible. Straightforward issues should normally be considered first through early resolution, unless the matter is serious, sensitive, complex or otherwise unsuitable for informal handling.

- a. A concern may be raised by email, telephone, online meeting or another accessible method.
- b. A formal complaint form is not normally required at the early-resolution stage.
- c. The person receiving the concern should try to resolve it within their authority or help the student reach the appropriate person.
- d. Possible early remedies include an explanation, correction, apology, practical solution, mediation or another agreed resolution.

6. Formal complaints - how to submit

A student may submit a formal complaint where early resolution has not worked or where early resolution is not appropriate.

- a. OCRPL will maintain a generic complaints email address and/or online submission route.
- b. OCRPL's Student Complaint Form may be used to help structure the complaint, but another clear written or accessible format may be accepted where reasonable.
- c. The complaint should identify the main issue, relevant dates, people or services involved, supporting evidence and the outcome sought.
- d. OCRPL will normally acknowledge receipt within 5 working days and explain the next steps and expected timeframe.

7. Time limit and late complaints

A formal complaint should normally be submitted within three calendar months of the event complained about, or within three calendar months of the last event where the complaint concerns a continuing or linked series of events.

OCRPL may accept a late complaint where there is a good reason. In deciding this, OCRPL will consider the student's individual circumstances, the seriousness and nature of the issue, any relevant equality or accessibility considerations, whether the student had a reasonable opportunity to complain earlier, and whether the matter can still be investigated fairly.

8. Initial assessment and routing

On receipt of a formal complaint, OCRPL will consider:

- a. whether the matter falls within this complaints procedure;
- b. whether OCRPL or a partner/awarding institution is responsible;
- c. whether the complaint is in time or should be accepted late;
- d. whether urgent safeguarding, welfare or protective action is needed;
- e. whether there is a conflict of interest requiring a different investigator or decision-maker;
- f. whether reasonable adjustments or support are required; and
- g. whether another OCRPL or partner procedure is more appropriate.

If another organisation or procedure is responsible, OCRPL will explain this clearly and, where reasonably possible, direct the student to the correct route.

9. Formal investigation - Stage One

The formal complaint will normally be investigated or determined by a suitable person who has not had material prior involvement in the matter.

- a. The student will have a fair opportunity to provide relevant information and evidence.
- b. Any person whose actions are materially criticised will normally be given a fair opportunity to respond where appropriate.
- c. The investigation will be proportionate to the nature and seriousness of the complaint.
- d. OCRPL may meet with the student, relevant staff or other persons where this will assist a fair decision.
- e. OCRPL will aim to provide the Stage One outcome within 28 calendar days where practicable. If more time is reasonably required, the student will be informed.

10. Stage One outcome and remedies

The written Stage One outcome will normally explain:

- a. the issues considered and how the complaint was investigated;
- b. the material findings and reasons for the decision;
- c. whether the complaint is upheld, partly upheld or not upheld;

- d. any practical or financial remedy and the timeframe for implementation; and
- e. how and when the student may request a Stage Two review.

Depending on the circumstances, remedies may include an explanation, apology, correction, practical action, service improvement, reconsideration, fee adjustment, refund, compensation or another proportionate remedy where appropriate.

11. Stage Two review

A student who remains dissatisfied may request a Stage Two review, normally within 28 calendar days of the Stage One outcome. A late request may be considered where there is a good reason.

A review should normally be based on one or more of the following grounds:

- a. a material procedural irregularity;
- b. the Stage One decision was unreasonable in light of the evidence available;
- c. new material evidence is available that could not reasonably have been provided earlier;
- d. relevant evidence was not properly considered;
- e. actual bias or a reasonable perception of bias; or
- f. an agreed remedy has not been implemented or is materially inadequate in relation to an upheld complaint.

The Stage Two review will normally be conducted by a suitably senior person or panel with no material prior involvement in the Stage One decision. It will not normally rehear the whole complaint unless fairness requires further investigation.

12. Final outcome

The Stage Two decision will be issued in writing with clear reasons. This marks the end of OCRPL's internal complaints procedure.

OCRPL will issue a Final Outcome Letter confirming the decision, any remedy, and any applicable next step. Where an independent ADR or external review route has been formally adopted by OCRPL, or where a relevant partner institution provides an applicable external route, the Final Outcome Letter will explain that route and any applicable deadline.

Where no external ADR or independent review scheme applies, completion of OCRPL's internal complaints procedure does not remove any statutory or legal rights available to the student.

13. Support, representation and reasonable adjustments

- a. Students may seek support from an adviser, friend, family member, student representative or other suitable person, subject to confidentiality and consent.
- b. A supporter or representative may assist with written submissions and may attend meetings where appropriate.
- c. OCRPL will not impose an absolute prohibition on legal representation. Any request will be considered case by case, taking account of fairness, complexity and the student's needs.
- d. OCRPL will consider reasonable adjustments to deadlines, format, meetings, communication or representation where required by law or reasonably necessary to avoid disadvantage.

14. Confidentiality and data protection

Complaints will be handled as confidentially as reasonably possible. OCRPL cannot promise absolute confidentiality because relevant information may need to be shared with the student, staff, witnesses, partners, advisers or authorities where necessary for a fair process, legal compliance, safeguarding or implementation of a remedy.

Complaint information will be processed securely and only for legitimate purposes connected with complaint handling, in accordance with applicable UK data-protection law and OCRPL's current approved privacy and records-management arrangements. Access to complaint case files will be restricted to those who reasonably require it.

15. Group complaints

Where several students raise materially the same issue, OCRPL may manage the matter as a group complaint where this is fair and efficient.

- a. The group should identify a lead representative and confirm the participating students.
- b. OCRPL will not normally require each student to submit an identical full complaint unless individual information is necessary.
- c. Any remedy will take account of whether it should apply only to named complainants or more broadly to other students affected by the same issue.

16. Partnerships and collaborative provision

Because OCRPL delivers programmes in partnership with universities and other academic institutions, complaint responsibility may differ by programme.

OCRPL will make clear, in the relevant programme information or partner arrangements, which organisation is responsible for complaints, academic appeals and other student disputes. Where responsibility is shared or a complaint involves more than one organisation, OCRPL will coordinate with the partner where permitted and will seek to avoid unnecessary duplication or disadvantage to the student.

17. Complaints involving other procedures

A complaint may raise issues that also fall under safeguarding, misconduct, harassment, whistleblowing, academic integrity or another procedure. OCRPL will determine the most appropriate route, explain this to the student and avoid requiring unnecessary repetition of the same information.

18. Unreasonable behaviour or misuse of the procedure

OCRPL may take proportionate steps where a complaint is pursued in a way that is abusive, threatening, seriously disruptive, repeatedly raises matters already decided without new information, or otherwise misuses the complaints process.

- a. Any restriction or termination of the process must be authorised by a suitably senior person who is not directly involved in the dispute.
- b. The student will receive written reasons and details of any restriction.
- c. A route to request review of that decision will be provided where appropriate.

19. Records, monitoring and learning

OCRPL will maintain appropriate confidential records of formal complaints and their outcomes.

- a. Records may include the complaint, evidence, correspondence, investigation notes, decisions, remedies and review outcome.
- b. OCRPL will monitor complaint themes, response times, repeat issues and outstanding corrective actions.
- c. An anonymised summary may be provided periodically to the Trustees or relevant governance body to support oversight and improvement.
- d. Complaint records will be retained under OCRPL's approved records-management arrangements and any applicable legal hold.

20. Responsibilities

Role	Responsibility
Trustees	Approve this procedure and receive proportionate assurance on material complaint risks, themes and corrective actions.
Responsible Officer	Own implementation, ensure the complaints route remains current and escalate material or systemic concerns.
Student Administration / Registry	Receive and administer formal complaints, maintain case records and track deadlines.
Investigators / Reviewers	Act impartially, manage conflicts, consider relevant evidence and provide clear reasoned decisions.
Programme Heads	Assist with factual information, programme matters and partner coordination within their responsibilities.
All staff and faculty	Recognise and route concerns appropriately, support early resolution where appropriate and avoid retaliation or unauthorised promises.

21. Related OCRPL documents and arrangements

- a. C1 Consumer Protection and Student Fairness Policy;
- b. C3 Student Protection Plan;
- c. C5 / current Student Terms and Conditions;
- d. C6 / current Refund and Compensation Policy;
- e. OCRPL Student Complaint Form;
- f. OCRPL Privacy Notice and approved records-management arrangements; and
- g. applicable partner/awarding-institution regulations, complaints procedures and academic appeals procedures.

22. Approval and review

This Student Complaints Procedure is approved by the Trustees. It will be reviewed periodically and sooner where there is a material change in OCRPL's educational model, partnerships, legal responsibilities or complaint-handling arrangements.