

GA Complaints Policy & Procedure

1. Purpose

It is the policy of Gatehouse Awards (GA) to acknowledge and, if appropriate, respond to and resolve any complaints as quickly as possible. GA carefully considers all types of feedback and complaints received, and endeavours to learn from it so that service can be continually improved.

The purpose of this policy is to set out the steps which must be followed when anyone submits a complaint to GA about any of its products or services and the steps GA will take when responding to complaints.

2. Scope

This procedure applies to all approved centres, Representatives, partners, customers, clients and learners who use the services of GA or its centres.

If a complaint is received regarding the service provided by a centre of GA, the complaint will only be considered by GA **after** that centre's complaints procedure has been exhausted and then only in relation to complaints directly related to GA products and services.

3. Definitions

A **complaint** is defined as an expression of dissatisfaction about a GA product, the standard of service provided by GA, the actions or conduct of GA or those acting on its behalf, or GA's failure to follow its published policies, procedures or service standards, where the matter is not more appropriately considered under another GA policy or procedure.

Complaints considered under this policy may include, but are not limited to, concerns relating to:

- Service and administration, including unreasonable delays, failure to respond, incorrect or misleading information, poor handling of enquiries or administrative errors.
- Conduct, including inappropriate or unprofessional behaviour by GA staff, GA Representatives or others acting on behalf of GA.
- Failure to follow published requirements or procedures, including failure by GA to follow its published policies, processes, procedures or timescales.
- The delivery or administration of GA qualifications by an approved centre, where the matter falls within GA's responsibilities as the Awarding Organisation. This may include concerns about how an approved centre has administered or delivered a GA qualification. Complaints concerning matters outside GA's remit should normally be addressed through the approved centre's own complaints procedure.

- Accessibility and the administration of agreed arrangements, including concerns about how an approved reasonable adjustment or other agreed arrangement has been implemented. Challenges to a decision made by GA will be considered under the appropriate policy or procedure rather than as a complaint.
- GA systems, assessment materials or other services, where their quality, availability or administration has adversely affected the service provided.

The following examples of complaints will **not** be considered under this policy:

- Dissatisfaction with an approved centre's commercial arrangements, such as its own course fees, payment plans, refunds or cancellation terms, where these are set by the centre rather than by GA.
- Disputes about services provided independently by a centre where these do not concern the delivery or administration of the GA qualification itself, e.g. course timetables, pastoral support, general facilities.
- Interpersonal disputes between a learner and centre staff or other learners that have no bearing on the delivery, assessment or administration of a GA qualification.
- Dissatisfaction with a third-party organisation or service not under GA's contract with a centre.
- Matters relating to an individual's employment or contractual relationship with a centre, where GA is not a party to that relationship.
- Other complaints about a centre's activities that are unrelated to GA qualifications
- Dissatisfaction arising simply because someone disagrees/is dissatisfied with a GA requirement, where GA has correctly applied its published requirements.

The lists above are illustrative and are not exhaustive. GA will determine whether a matter falls within the scope of this policy and, where it is more appropriately considered under another GA policy or procedure, will advise the complainant accordingly.

An **adverse effect** is defined as an act, omission, event, incident, or circumstance if it:

- (a) gives rise to prejudice to Learners or potential Learners, or
- (b) adversely affects –
 - (i) the ability of the awarding organisation to undertake the development, delivery or award of qualifications in a way that complies with its Conditions of Recognition,
 - (ii) the standards of qualifications which the awarding organisation makes available or proposes to make available, or
 - (iii) public confidence in qualifications.

4. Exceptions

GA's ability to investigate a complaint fairly and thoroughly depends on being able to seek clarification, request evidence, and, where necessary, test the credibility of the account provided. While this policy covers all complaints received, there may be exceptions where:

- the complaint has been submitted anonymously
- the complaint has been submitted by an individual whose identity cannot be verified

- the complainant cannot be contacted
- the complainant does not respond to reasonable requests for further information
- contact details provided (such as an email address) prove to be invalid or non-functioning
- the complainant is known to GA as someone who has a history of making vexatious and/or false reports
- the complaint contains significant factual inaccuracies relating to GA or centre processes

Where there are indications that a report is unlikely to be capable of substantiation, or that suggest that the complainant is attempting to misuse the complaints process, GA reserves the right not to pursue further investigation, while remaining open to reviewing the matter if credible new evidence is subsequently provided.

If GA has reason to believe that a complaint received is malicious or vexatious in nature, and/or there are one or more of the indicators above present, it may be rejected on that basis without further investigation, and the complainant informed of that decision. Should the complainant wish to challenge such a decision, they would need to provide sufficient evidence to demonstrate that the complaint was made in good faith and is capable of substantiation.

A separate ‘*Whistleblowing Policy and Procedure*’ is in force and sets out the parameters of investigation and treatment of any allegations made under it. Please note that whistleblowing only relates to employees of the organisation against which the allegations are being made.

5. Support for Complainants

GA is committed to ensuring that all complainants can access and participate fully in the complaints process. Complainants may be assisted by a support person, advocate, or representative of their choice at any stage of the complaints process.

GA will make reasonable adjustments to accommodate complainants with accessibility needs, including providing information in alternative formats, arranging interpreters or translation services where required, and allowing additional time for responses where necessary.

Complainants should notify GA of any support or accessibility requirements when submitting their complaint. Where a complainant is unable to communicate directly due to disability, illness, or other circumstances, GA will work with them or their representative to agree an appropriate communication method. These adjustments will be provided at no cost to the complainant and will not disadvantage their complaint in any way.

6. Procedure

6.1. Making a Complaint: Informal Complaints

Sometimes an individual may have an informal complaint that could be resolved quickly. These can be made verbally or in writing (including email). Where a complaint is fully

resolved within five working days of it being received, such a complaint will not be recorded by GA on the complaints log.

Informal complaints must be made within 10 working days of the incident being complained about, where applicable.

If a complaint cannot be resolved as above, it will move to being treated as a 'formal' complaint.

6.2. Making a Complaint: Formal Complaints

Unless escalated from an informal complaint (see above), a formal complaint must be made in writing (this includes via email). A written complaint must clearly state the nature of the complaint. All complaints must be made within 10 working days of the incident taking place (or of the exhaustion of the centre's complaints process, where applicable). Where a complaint does not involve a particular incident, e.g. it relates to a GA product, a complaint may be made in writing it should be raised within a reasonable period of the matter giving rise to the complaint becoming known to the complainant.

If a complaint is made about the service provided via an authorised GA Representative, it should be addressed to the Representative who will forward it to GA on behalf of the complainant. Where deemed appropriate, the investigation of the complaint may be delegated to the GA Representative in the first instance.

If the complaint is in respect of the GA Representative, then the complainant should send their complaint directly to the GA head office in the UK.

All formal complaints, regardless of where received, will be recorded at GA head office in the UK.

An acknowledgement of receipt of the complaint will typically be sent to the complainant by GA within five working days. This response will include a summary of GA's understanding of the reason(s) for the complaint.

GA expects that the complainant will confirm GA's understanding of their complaint in writing. Should the complainant consider that GA's understanding is incomplete or incorrect, they should provide a clear explanation of the corrections required within five working days. Any delays in receiving a complainant's confirmation or clarification may result in GA requiring additional time to process the complaint.

GA will determine whether or not the complaint falls under the scope of this policy. Where it does not, GA will confirm this in writing to the complainant. Where it does, GA will assign the complaint to the most appropriate member of staff for investigation, ensuring that the appointed individual has no personal interest in the outcome of the investigation.

Stage 1 – GA Internal Review

The appointed member of staff will carry out an investigation and review all the documentation available before reaching a decision. If a decision cannot be reached based on the information available, the member of staff investigating the complaint will arrange for the complainant and / or any other person to be contacted to obtain further information.

Stage 1 should normally be completed within 20 working days. If an investigation will take longer than this, the complainant will be informed in writing and provided with a revised timetable for GA's response.

If a complaint is received in respect of the conduct of an approved centre, this may trigger an investigation in line with our Maladministration and Malpractice Policy. The same considerations regarding anonymity, unverifiable identity, non-engagement, and malicious or vexatious reporting set out in Section 4 above will continue to apply when GA assesses whether such a complaint warrants investigation under that policy.

The possible outcomes of a complaint are:

- Complaint Upheld (either in full or partially) – GA finds that the complaint raised has merit and appropriate action will be taken to remedy the situation
- Complaint Rejected – GA finds that the complaint raised has no grounds for complaint and provides clearly stated reasons

If the complainant is not satisfied with the outcome of the complaint, they can request that their complaint is escalated to Stage 2 of the complaints process.

Stage 2 – Governance Committee

When a complaint has been requested to be escalated to Stage 2, the complainant will be informed of the date of the next Governance Committee meeting. A special meeting of the Governance Committee will not normally be convened in order to deal with escalated complaints unless there is a specific time-sensitivity issue which needs to be addressed.

The Governance Committee will be provided with all relevant information and documentation in respect of the complaint being escalated and will table this for discussion at the next meeting. Meetings are held on a quarterly basis.

The Governance Committee will consider whether the GA policy and procedures for complaints handling have been adhered to in a compliant manner. It will also consider whether the outcome of Stage 1 of the complaint was appropriate, given all the evidence available to them.

The complainant will be notified of the outcome of the Stage 2 complaints process within 5 working days of the Governance Committee meeting taking place.

The potential outcomes of the Stage 2 complaints process are:

- Complaint Upheld – the Governance Committee finds that the complaint raised has merit and that the outcome of Stage 1 of the complaints process was not appropriate. They will provide the complainant with the details of what actions may be taken to resolve this issue.
- Complaint Rejected – the Governance Committee finds that the complaint raised has no grounds and that the outcome of Stage 1 of the complaints process was appropriate. They will provide the complainant with an explanation of how this decision has been reached.

If the complainant is not satisfied with the outcome of the complaint, they can request that their complaint is escalated to Stage 3 of the Complaints Process.

Stage 3 – Escalation to Ofqual

If the complainant remains unsatisfied with the outcome after escalating their complaint, they can contact Ofqual.

The details of how to raise a complaint with Ofqual can be found here:

<https://www.gov.uk/government/organisations/ofqual/about/complaints-procedure>

7. Monitoring

All formal complaints will be monitored on an ongoing basis, with any relevant issues being escalated to the Governance Committee, including any trends that become visible due to the complaints received. This includes monitoring for patterns of repeated anonymous, unverifiable, or unsubstantiated complaints or notifications made against the same centre over time. Where such a pattern is identified, GA will consider whether it indicates a genuine, unresolved concern warranting further action, or is more consistent with targeted or reputationally motivated reporting, and will escalate accordingly to the Governance Committee and, where appropriate, to the Regulator.

Records of complaints made are used for the following purposes:

- To review the approach GA takes to the development, delivery and awarding of our qualifications
- To inform improvements to the service within development, delivery and awarding of qualifications
- To enable changes to be made where elements of GA's service have been identified as non-compliant, not fit for purpose or providing poor customer satisfaction
- To enable GA to gather evidence which may be required when informing Ofqual of events or incidents which may have had adverse effects or could potentially lead to adverse effects.

In accordance with Ofqual's General Conditions of Recognition, Condition I2.3, where the application of the complaints process leads GA to discover a failure in its processes, GA will take all reasonable steps to:

- identify any other learner who has been affected by that failure,
- correct or, where it cannot be corrected, mitigate as far as possible the effect of the failure, and
- ensure that the failure does not recur in the future.

8. Confidentiality

Ofqual General Conditions of Recognition specifically states the importance of maintaining confidentiality during the complaints process, as follows:

Condition D4.2: *"Nothing in this condition obliges an awarding organisation to disclose information if to do so would breach a duty of confidentiality or any other legal duty."*

GA will respect requests for confidentiality wherever possible, but cannot guarantee anonymity in cases where:

- disclosure is necessary to investigate the complaint fairly
- regulatory bodies (e.g. Ofqual) require full disclosure
- law or safeguarding duties require disclosure

9. Notifications to Ofqual

If GA identifies any potential or actual adverse effects while administering the complaints process, GA will promptly notify Ofqual and provide details of the corrective or mitigating steps it will take.

10. Policy Review

GA will carry out a review of the policy at least every two years, and revise it, if necessary, in response to feedback or good practice.

Document Specification:	
Purpose:	To set out the way in which GA handles any complaints received in respect of the products and services it offers.
Accountability:	GA Governance Committee
Responsibility:	Responsible Officer
Version:	9
Effective from:	August 2026
Indicative Review date:	August 2028
Links to Ofqual GCR	D4, I2
Other relevant documents:	GA Terms and Conditions of Business GA Conflicts of Interest Policy GA Whistleblowing Policy GA Malpractice and Maladministration Policy GA Centre Handbook