

ACCREDITATION THROUGH PARTNERSHIP



The British
Psychological Society
Partnership & Accreditation

Making a complaint about an accredited programme

1. Introduction

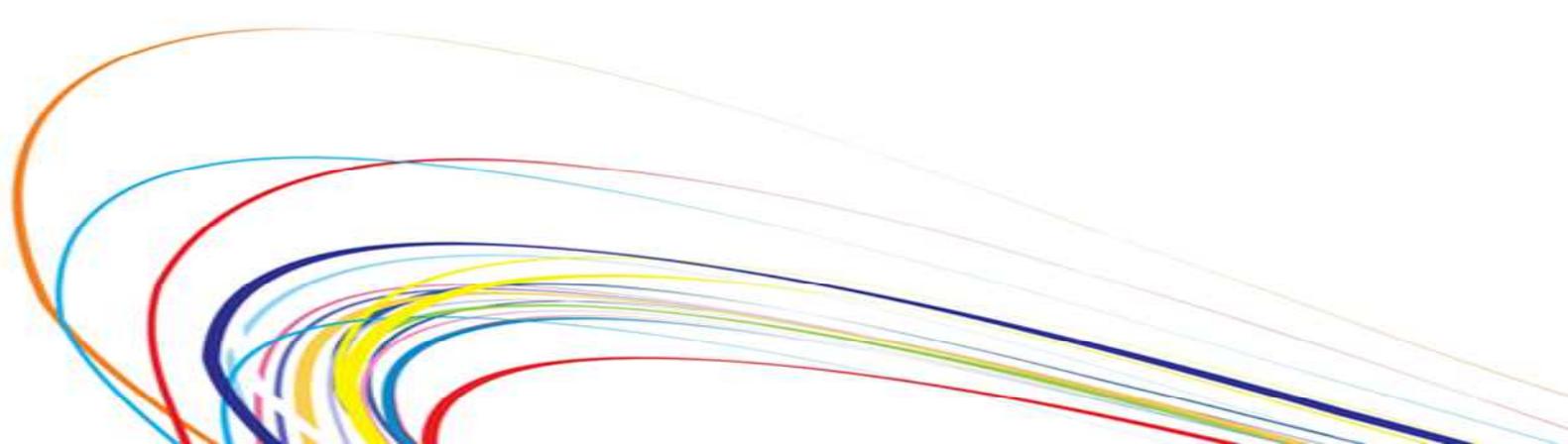
This document provides information for anyone considering making a complaint about a programme of education or training that the Society accredits. Accredited programmes have demonstrated that they meet our accreditation standards, and our complaints process is designed to enable us to take appropriate action in the event that the standards are compromised.

2. Definitions and scope

For the purposes of this document, a complaint is defined as the expression of a specific concern about matters related directly to our standards that affect the quality of the learning opportunities available to students on a programme of education or training that is accredited by the Society.

Anyone can make a complaint about an accredited programme. Those considering making a complaint should familiarise themselves with the expectations set out below.

We can only respond to a complaint if it relates directly to our standards. To find out more about the standards that relate to the accredited programme(s) about which you wish to make a complaint please look at the relevant accreditation handbook, at www.bps.org.uk/accreditationdownloads.



3. Expectations

3.1 Expectations of education providers

The education providers whose programmes are accredited by the Society are required to have in place systems for collecting feedback from their key stakeholders, particularly students. We expect these systems to include opportunities for complaints to be made, in order that any specific difficulties may be identified by the education provider and acted on as appropriate. Feedback provided through these channels enables the education provider to review its procedures and standards, and to make changes to these if appropriate, whether to resolve the complaint in question, or to improve the experience of others.

In designing their processes for dealing with complaints, education providers are expected to reflect on Chapter B9 of the *UK Quality Code for Higher Education, Academic Appeals and Student Complaints* (Quality Assurance Agency for Higher Education, 2013). Their procedures for handling appeals and complaints must be fair, accessible and timely, and enable enhancement. They should:

- make available opportunities for students to raise matters of concern without risk of disadvantage;
- have procedures which encourage constructive engagement and which offer opportunities for early and/or informal resolution;
- ensure that their procedures are accessible;
- provide clear advice and guidance to students making an appeal or complaint, and to staff involved in handling or supporting appeals and complaints;
- ensure that their procedures are conducted in a timely and fair manner;
- ensure that appropriate action is taken following an appeal or complaint; and
- monitor and evaluate the effectiveness of their procedures, and reflect on the outcomes of those procedures for enhancement purposes.

Education providers should make students and other stakeholders aware of the range of internal and external complaints processes they may access. This should include signposting students to the Society's process for making a complaint about an accredited programme (as outlined in this document); for example, by including a link to www.bps.org.uk/accreditationdownloads within their student handbook, or on their virtual learning environment (e.g. Blackboard, Moodle).

3.2 Expectations of those making a complaint about an accredited programme

Students and others wishing to make a complaint about an accredited programme must raise their concerns via the education provider's complaints procedure before the Society will consider the complaint.

Complainants should be aware that **the Society is not able to intervene in individual disputes**. We are, however, able to consider the matters raised in order to form a view on whether the programme's fulfilment of our standards may be compromised, and take action where appropriate. Action may include requiring that specific aspects of the accredited provision change in the future, or may result in the suspension or withdrawal of accreditation for future student intakes to the programme. Action will not be specific to your individual dispute.

In order for us to be able to consider your complaint, you will need to ensure that you tell us **in writing**:

- the name of the education provider;
- the name of the programme you are making a complaint about; and
- details of the complaint you wish to make.

You will also need to provide:

- evidence that you have raised your complaint via the education provider's own procedure;
- details and evidence of any decisions reached by the education provider as a result of that process;
- any key supplementary evidence that you feel supports the claims you are making; and
- confirmation that we may share details of your complaint, including your name, with the education provider, along with any evidence you have provided.

If you do not include the above information, we will ask you to provide it before we are able to reach a decision regarding how we will pursue your complaint. You will therefore need to ensure that you provide us with details of how you would prefer us to contact you in the event that we have any questions in relation to your complaint.

You should provide your complaint by email or in hard copy to the Partnership and Accreditation Manager at pact@bps.org.uk or The British Psychological Society, St Andrews House, 48 Princess Road East, Leicester LE1 7DR. If you wish to seek informal advice prior to making a complaint, you may do so either by email at the address above, or by contacting the Partnership and Accreditation Team on +44 (0) 116 254 9568.

The Society will reject complaints that are:

- anonymous;
- about the academic judgement of an education provider;
- unwarranted (not well founded), frivolous (not serious), vexatious (intending to cause annoyance) or malicious (intending to do harm);
- made more than six months following conclusion of the education provider's own complaints procedure; and/or

- made about a programme that was not accredited by the Society when the circumstances leading to your complaint occurred, or that no longer carries Society accreditation.

3.3 Expectations of the Partnership and Accreditation Team

The Partnership and Accreditation Team will write to you at each stage of our consideration of your complaint, as outlined in section 4 below, to let you know the decisions we have reached at each stage of the process.

Whilst a complaint is in progress, the Partnership and Accreditation Team will ensure that appropriate confidentiality is maintained, and the matter only discussed with designated individuals as specified in section 4 below.

The Partnership and Accreditation Manager will be responsible for ensuring that all complaints that reach investigation stage are reported to the Partnership and Accreditation Committee. This will enable the Committee to reach a view on both the overall effectiveness of its process for dealing with complaints, and whether the complaint highlights aspects of its accreditation standards or practices that would benefit from review.

4. Consideration of your complaint

4.1 Acknowledgement

Complaints will be acknowledged by a member of the Partnership and Accreditation Team within 10 working days of receipt.

Following acknowledgement of receipt of a complaint, we will review the information you have provided, as outlined in 3.2 above. If you have not sent us all the information we need to consider your complaint, we will write to you and explain what information is missing. If you do not provide the missing information within 1 calendar month of request, we will close your complaint.

Once we have all of the information we need, we will follow the process outlined in section 4 of this document. We expect to deal with most complaints within three to six months of receipt. However, this depends on what the complaint is about and how complicated the matters raised are.

4.2 Initial assessment

The Partnership and Accreditation Manager will evaluate the information you have provided against our standards to establish whether what you have told us indicates that fulfilment of our standards may have been compromised. In doing so, the Partnership and Accreditation Manager may seek advice from relevant Society Members or colleagues. Typically this will be limited to Chairs and Deputy Chairs of the Society's Education and Training Committees, members of the Partnership and Accreditation Committee or Membership and Standards Board, and senior members of Society staff, dependent on the nature of the complaint received.

We have well-tested processes in place to ensure that the colleagues with whom we consult have no connection with the education provider about whom the complaint is being raised. Together, we will reach one of three decisions, which are outlined below together with the action we will take in each instance:

Decision	Outcome
The information you have provided, if founded, indicates a potential failure on the part of the education provider to achieve our standards for accreditation.	We will write to the education provider, normally to the Programme Director and/or Head of Department, outlining the standards that we feel could be compromised on the basis of the information we have received, inviting them to respond within one month. We will enclose a copy of your complaint to enable the provider to respond to the matters raised in full. We will write to you to confirm that we are taking this course of action.
The information you have provided does not enable us to reach a decision.	We will write to you outlining the standards that we feel may potentially be compromised, and outlining the further information we require in order to reach a clear decision, and

	to take the matter forward with the education provider. If you do not provide the missing information within 1 month of request, we will close your complaint.
The information you have provided does not indicate a failure on the part of the education provider to achieve our standards for accreditation, and/or does not relate to our standards.	We will write to you, thanking you for raising your concerns with us, and outlining the reasons why we are unable to take your complaint forward.

Where a complaint is received fewer than six weeks in advance of a scheduled accreditation visit taking place, the Partnership and Accreditation Manager will consult with the Chair and Deputy Chair(s) of the relevant Education or Training Committee to decide whether the visit should be deferred until such time that the complaint has been resolved. In the event that the Chair and/or Deputy Chair(s) are themselves participating in the accreditation visit, the Chair and Deputy Chair of the Partnership and Accreditation Committee will be consulted. Unless there is a compelling reason not to do so, the visit will normally go ahead as scheduled, and the matters raised in the complaint will be dealt with and documented independently of the visit process.

4.3 Investigation (paper-based)

Once we have established that there are grounds to take your complaint forward, we will contact the education provider and await their response. Our investigation will focus on the specific details of your complaint rather than considering the provision as a whole. The response we will expect will include either:

- an acknowledgement of the validity of the complaint raised, and the steps that have been taken to address any shortcomings identified, and to meet our standards for accreditation; or
- appropriate evidence that seeks to demonstrate the education provider’s continued achievement of the standards we have identified. If appropriate, we may make suggestions as to the type of evidence that would be most helpful.

We will indicate the timeframe within which a response is required (typically one month, although this is dependent on the nature and complexity of the response being sought).

Once the response and associated evidence has been received, it will be evaluated with a view to reaching one of the following three decisions:

Decision	Outcome
The response provided by the education provider demonstrates that the standards for accreditation continue to be met.	We will write to the education provider, thanking them for their response, and advising that the matter is closed.
The response provided by the education provider does not enable us to reach a decision.	We will write to the education provider outlining the further information we require.

<p>The response provided by the education provider indicates that fulfilment of our standards may have been compromised.</p>	<p>We will write to the education provider outlining the standards that we feel may have been compromised. We will either arrange a teleconference or an on-site visit to take the matter forward with a view to resolving the complaint.</p>
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We will write to you to confirm the decision we have reached and the outcome to which our decision has led.

4.4 Investigation (in person)

If the education provider's response to your complaint leads us to decide that fulfilment of our standards may have been compromised, there will be specific questions that the Society would need to have answered in order to be assured that accreditation may continue. Dependent upon the nature of these questions, it may be possible to reach a conclusion through a focused teleconference discussion between relevant individuals. This would typically include a member of the Partnership and Accreditation Team, a Society Member(s) with appropriate experience of delivering the Society's accreditation process and expertise of relevance to the programme(s) under consideration, the Programme Director(s), and the Head of Department with responsibility for the programme(s) in question. However, either the Society or the education provider involved may request that the matter is dealt with in situ rather than at a distance.

Where an on-site visit is deemed appropriate or necessary, the Society's representatives will meet with relevant programme staff, the education provider's senior management team, and, dependent upon the nature of the complaint and the information we require, with students/trainees or other participants in the programme. On-site visits will normally be undertaken by two Society Members who will be accompanied by a member of the Partnership and Accreditation Team.

In both scenarios, the purpose of our intervention will be to gain as rounded a picture as possible of:

- the factors that may have led to the complaint having been raised in the first place;
- the steps that the education provider has taken to review its own handling of the situation;
- any action that has been taken since the original complaint was raised (either via the education provider's own complaints process, or by the Society); and
- any action that is planned.

The visiting team's role will be to conclude whether, overall, this constitutes a satisfactory response, or whether there are further specific courses of action that need to be taken within an agreed timeframe.

The Society's accreditation process is based on collaborative working and partnership, not on policing. We expect the education providers with whom we work to respect our recommendations, and to respond to them appropriately; education providers are in the business of running good programmes, and will seek to maintain their reputations within the wider higher education community. On that basis, we will always give education providers the opportunity to rectify any aspects of their provision that does not achieve the high standards that the Society expects.

However, we are **not** prepared to compromise on minimum standards. If our intervention highlights a serious failure to achieve standards, we may recommend that future intakes to the programme(s) are not accredited until such time as appropriate corrective action has been implemented. Alternatively, we may agree that it is appropriate for accreditation to continue, subject to specific corrective action being taken over the longer term. Following any investigation undertaken in person, our reviewers' decision will be referred to the Society's Partnership and Accreditation Committee to be scrutinised, defended and ratified prior to being communicated in full to the education provider. The outcome of our investigation will also be communicated back to the original complainant.

5. Other information

5.1 Information sharing: education providers

Because we are only able to pursue complaints that have already been considered via the education provider's complaints procedure, complainants should be aware that we will need to refer to the specific details of that complaint, and the associated evidence submitted, in our correspondence with the education provider. Unless there are compelling reasons not to do so, the Society will share the complaint with the education provider in full in order to enable the provider to supply a comprehensive response. Complainants should therefore be aware that, whilst complaints will be handled sensitively and proportionately, anonymity and confidentiality cannot be protected.

5.2 Information sharing: Health and Care Professions Council

Some of the programmes accredited by the Society are also approved by the Health and Care Professions Council (HCPC). The HCPC has processes for considering concerns about the programmes it approves (outlined at <http://www.hcpc-uk.org/education/processes/concerns>), and about the fitness to practise of individuals involved in the delivery of those programmes (outlined at <http://www.hcpc-uk.org/complaints>). There is no obligation on the Society or on the individuals who participate in the investigatory processes outlined in this document to share the details of the complaint with the HCPC. However, we reserve the right to do so (dependent on the nature of the complaint raised), particularly where:

- we are of the opinion that the information provided suggests that the programme may no longer be meeting the HCPC's standards; or
- the information provided potentially raises concerns about an individual registrant's fitness to practise.

Individuals making a complaint about an HCPC approved programme are therefore encouraged to correspond directly with the HCPC. In the event that both the HCPC and the Society progress with an investigation into the complaint, it should be noted that both investigations will occur independently, and independent conclusions will be reached.

5.3 Information sharing: Quality Assurance Agency

In addition to meeting the Society's standards, education providers' own academic standards and the ways in which they fulfil their responsibilities are periodically evaluated by the Quality Assurance Agency for Higher Education (QAA). The QAA's website includes some helpful guidance on making a complaint, which can be found at <http://www.qaa.ac.uk/complaints/>. This provides a step-by-step guide for people wishing to complain about their individual experience, as well as guidance on making a complaint against an individual member of staff, but makes clear that, like the Society, QAA has no remit to become involved in such individual disputes.

QAA can investigate concerns about the academic standards and quality of higher education provision, and about the information higher education providers make available about the learning opportunities they offer. Where there is evidence of weaknesses which go beyond a single, isolated occurrence, and

where the evidence suggested broader failings in the management of academic quality and standards, QAA can investigate.

Whilst the Society would not typically refer details of complaints to the QAA, we reserve the right to do so (dependent on the nature of the complaint raised).

5.4 Other avenues for raising complaints

As outlined in Chapter B9 of the QAA's *Quality Code*, higher education providers must ensure that they meet the requirements of any applicable schemes or arrangements for the independent review of academic appeals and complaints.

Students of publicly funded universities and higher education providers in England and Wales have a right of access to the Office of the Independent Adjudicator (OIA) Scheme (<http://oiahe.org.uk/making-a-complaint-to-the-oia/how-to-make-a-complaint.aspx>), as long as the provider's internal procedures have been exhausted. Similarly, from 1 September 2015, students of higher education in publicly funded further education colleges in England and Wales also have a right of access to the OIA.

The Scottish Public Services Ombudsman (SPSO) has similar jurisdiction for Scottish providers (<http://www.spsso.org.uk/how-to-complain-about-a-public-service>).

Students in Northern Ireland should contact the Department for Employment and Learning (<http://www.delni.gov.uk/>).

5.5 Feedback

The Society is committed to working in a transparent and accountable way, and we welcome your comments if you feel that we could have handled your complaint more effectively. Please send your feedback to the Director of Qualifications and Standards.

5.6 Appealing our decision

Education providers who are unhappy with the way that the Society has dealt with a complaint about their programme(s) can formally appeal against our decision. Information about our appeals process can be accessed at <http://www.bps.org.uk/accreditationdownloads>.