



KeeleSU and KPA Complaints Review Procedure

1. INTRODUCTION

Under [section 22.2 \(m\) of the Education Act 1994](#), the University must provide a complaints procedure for students who have exhausted the internal processes of Keele University Students' Union (KeeleSU) or the Keele Postgraduate Association (KPA) and remain dissatisfied with the outcome.

This procedure allows for students who are dissatisfied with their dealings with either KeeleSU or the KPA or claim to have been unfairly disadvantaged by opting out of KeeleSU/KPA membership to ask the University to review the outcome of their case. There is provision for the University Council to appoint an independent person to investigate and report on the complaint as set out in Ordinance XV (and the KeeleSU Code of Practice) and XVI (and the KPA Code of Practice).

2. SCOPE

This procedure applies to all students of the University who are, by virtue of their enrolment, members of KeeleSU and/or the KPA, regardless of whether they choose to opt out of membership. The procedure concerns cases where all internal processes within the KeeleSU/KPA have been completed and the student remains dissatisfied.

Complaints from members of staff in KeeleSU/KPA are not covered by this procedure.

For students wishing to make a complaint about the University, this should be directed to the [Student Appeals, Complaints and Conduct](#) section of the Directorate of Student and Academic Services.

3. PROCEDURE

3.1 Initial Review by Council

When the processes within KeeleSU or KPA have been concluded, and the student remains dissatisfied, the student may submit a complaint to the University Council on the basis of the following grounds:

- (a) Procedural irregularity prior to or in the conduct of the investigation of the matter by KeeleSU/KPA; or if
- (b) There is new evidence that can be substantiated that was not known at the time and there is a valid reason for not making it known at the time.

Any complaints should be submitted to the Secretary of Council within 14 calendar days of the date of the outcome letter from KeeleSU/KPA. Complaints should be submitted using the KeeleSU & KPA Complaints Review Form [see Annex A and the following web link: <https://www.keele.ac.uk/sas/academicservices/legalgovernance/governance/studentsunion/>] and either emailed to governance@keele.ac.uk, or sent to Secretary of Council, C/O Governance, Student and Academic Services, Keele University, ST5 5BG.

The Complaints Review Form should be completed in full and should refer to any relevant evidence, which should be submitted at the same time.

Any complaint not within the scope of this procedure will be ineligible for review.

If grounds for review have not been established, the case will be rejected by the Secretary to Council. The student will be notified and this decision will complete the University's internal procedures.

If it is clear that the grounds for review have been established, the Secretary to Council may make a recommendation on behalf of Council for KeeleSU/KPA to provide suitable and proportionate remediation.

If the case is complex or requires further detailed investigation, the Secretary to Council will arrange for the case to be reviewed by an independent person appointed by the Council.

3.2 Review by an Independent Person

If a case for review is found, the Secretary to Council will ask the Council to appoint an independent person, usually a lay member of Council, to review the complaint.

The student will be informed of the person investigating the complaint (the Investigating Officer), will be updated on the progress of the investigation and will be provided with an expected timescale for completion of the review.

The Investigating Officer will have the discretion to seek more evidence or speak with any of the parties involved in order to reach an outcome.

Once an outcome is reached, the Investigating Officer will present a report of the findings and any recommendations to Council for ratification of the decision.

Where appropriate, the Chair of Council may act on behalf of Council to implement the recommended remedy to a complaint.

3.3 Complaint to the Office of the Independent Adjudicator for Higher Education

Under the Higher Education Act 2004, the University subscribes to the independent scheme for the review of student complaints. If the student is dissatisfied with the outcome, they may be able to apply for a review of the case to the Office of the Independent Adjudicator for Higher Education (OIA). More information on submitting a complaint to the OIA will be provided in the completion of procedures letter issued at the conclusion of the complaint.

4. ROLES AND RESPONSIBILITIES

For more information regarding this procedure, please contact the Governance Team by email: governance@keele.ac.uk.

4. RELATED POLICIES AND PROCEDURES

This procedure should be read in conjunction with KeeleSU's Constitution, Bye-Laws and Complaints procedure; and the KPA's Constitution and Complaints Procedure. These documents can be found on their respective websites:

<https://keelesu.com>

<https://kpa.org.uk>

More information can also be found within the University Ordinances XV and XVI and the KeeleSU/KPA Code of Practice.

5. REVIEW, APPROVAL & PUBLICATION

This procedure is subject to review every three years by the Governance Team, Student and Academic Services, in consultation with Officers from KeeleSU and the KPA. Where there is a need to amend the Procedure outside of this cyclical timescale, the Officers from the Unions will also be consulted.

Amendments to this procedure and its final approval rests with the University Executive Committee to ensure that the procedure is adequate, efficient and compliant with the requirements of the Education Act – Section 22. Council will be notified of the procedure and of any significant amendments to the procedure, as it may impact on the business of Council and the duties of individual members.

This procedure is located on the University webpages in the Policy Zone, on the KeeleSU and KPA webpages, and can be provided by contacting the University's Governance Team: governance@keele.ac.uk.

7. DOCUMENT CONTROL INFORMATION

Document Name	KeeleSU and KPA Complaints Review Procedure
Owner	Legal & Governance, Student & Academic Services
Version Number	1.0
Equality Analysis Decision and Date	[TBC]
Approval Date	15/01/2019
Approved By	University Executive Committee
Date of Commencement	15/01/2019
Date of Last Review	N/A
Date for Next Review	15/01/2022
Related University Policy Documents	Ordinances XV and XVI (<i>See also the KeeleSU Complaints Procedure, KeeleSU Bye-Laws, KPA Complaints Procedure and KPA Constitution</i>)
<i>For Office Use – Keywords</i>	

ANNEX A – KeeleSU & KPA Complaints Review Form

KEELESU AND KPA COMPLAINT REVIEW REQUEST FORM

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This procedure allows for students who are dissatisfied with their dealings with either KeeleSU or the KPA or claim to have been unfairly disadvantaged by opting out of KeeleSU/KPA membership to ask the University to review the outcome of their case.

When the processes within KeeleSU or KPA have been concluded, and the student remains dissatisfied, the student may submit a complaint to the University Council on the basis of the following grounds:

- (a) Procedural irregularity prior to or in the conduct of the investigation of the matter by KeeleSU/KPA; or if
- (b) There is new evidence that can be substantiated that was not known at the time and there is a valid reason for not making it known at the time.

Complaints should be submitted by completing this form and either emailed to governance@keele.ac.uk, or sent to Secretary of Council, C/O Governance, Student and Academic Services, Keele University, ST5 5BG.

Any complaints should be submitted to the Secretary of Council **within 14 calendar days of the date of the outcome letter from KeeleSU/KPA.**

Section A: PERSONAL INFORMATION

Surname:	
First name:	
Student Number:	
Keele Email Address:	
Alternative Email Address (if Keele email disabled):	
Programme:	
Year of Study:	

Section B: GROUNDS FOR REVIEW REQUEST– please tick as appropriate

- Procedural irregularity in the conduct of the case;
- There is new evidence that can be substantiated, including extenuating circumstances, which was not known at the time and may have affected the outcome had it been known to the Committee and that there is a valid reason for not making it known at the time.
- Please tick here to consent to the University processing any *sensitive personal data* you have provided in your complaint in accordance with the accompanying guidance and privacy notice.**

Please tick here to confirm that where you are providing personal and/or sensitive information *about another person*, you have told that person you are doing this and have told them how the information will be processed.

I declare that the information that I have given on this form and the accompanying documents is true.

Signed

Date

Section C: REVIEW REQUEST

Please provide, below, a statement explaining why you wish your complaint to be reviewed by the University Council. Please include as much information as possible to support your claim. Please provide any further documentary evidence in **electronic format**, and submit these alongside your statement to governance@keele.ac.uk.

<insert statement here>

Privacy Notice and how we will process your information:

The information that you give in your review request, together with any supporting evidence, will be processed by the following:

- **Members of the Governance Team** who process your request;
- **Representatives from KeeleSU/KPA** who may be asked for information on your complaint and how it was investigated (if the information is not readily available in your submission) or to comment on any procedural irregularity. The information will only be given to staff in who are able to respond to the issues raised. You will be allowed to see and comment on any information provided;
- Any other person or service named in your request who we may need to contact to check the issue you have raised;
- **The Secretary to Council** who will consider your initial submission and decide if you have a case for review;
- Where the case is more complex or requires further exploration of the evidence, your request may be considered by a **member of the University Council**.

Other than verification checks your data will not be shared with any third parties without your further consent.

The review process relies on making known any information which may influence your case regardless of whether it is personal or embarrassing. If you do not wish certain sensitive information to be made known, you can specify that information be shared only with the Governance Officer dealing with your case and the Secretary to Council who makes the final decision. In exceptional cases a letter from a doctor or counsellor confirming that the circumstances are very exceptional, and how these may have affected your case, will be acceptable.

Our legal basis to process your request data

The provision of a review process is provided as part of the contract we have with our students; and as part of our public task as a University.

Where you have provided any sensitive personal data (Special Category*) we will need your explicit consent in order to process this information. If you do not consent to us processing your sensitive personal data, then we will remove this data from your submission and this will not be considered. Please also see above for information on what to do if you do not wish certain personal information to be made known.

*This includes data related to your health, racial or ethnic origin, religious or philosophical beliefs, trade union membership, sex life, sexual orientation or genetic/biometric data.

Personal Data of others

Please do not submit any unnecessary personal information, particularly about third parties.

How long we will retain your data

As stated in the University's retention schedule, information regarding your case will be kept securely for 6 years following the last action on the case.

Further privacy information

The University's full Student Privacy Notice, which contains further information and details your rights (including withdrawing consent), can be found at:

<https://www.keele.ac.uk/informationgovernance/checkyourinformationisbeinghandledcorrectly/privacynotice-students/>.