



Student complaints policy

January 2026

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1. Introduction

The Student Complaints Policy of the Association of Costs Lawyer Training (ACLT) has been informed by the Quality Assurance Agency's (QAA) UK Quality Code for Higher Education, specifically the Advice and Guidance on Concerns, Complaints and Appeals. The QAA's Quality Code is the definitive reference point for all UK higher education institutions and sets out how academic standards are established and maintained and how the quality of learning opportunities is assured and enhanced. This policy sits within ACLT's quality framework which provides a suite of policies designed to safeguard the academic standards of ACLT and to assure the quality of learning opportunities offered; this policy should therefore be read in conjunction with other relevant policies within the framework. This policy was approved by the ACLT Board and will be reviewed annually.

1.1 Definitions

ACLT recognises that central to this policy is ACLT's responsibility for the academic standards of all awards granted in its name and the quality of learning opportunities for students.

- For the purposes of this policy, a student is defined as anyone who has accepted a place at ACLT, is currently studying at ACLT, or is a past student of ACLT; an apprentice or a learner on the CLPQ
- For the purposes of this policy a complaint is defined as the expression of a specific concern about the quality of learning opportunities, or the provision by ACLT of a programme of study or related academic or administrative service, other than liability for course fees. However, the Student Complaints Policy is not a substitute for the regular process of open communication and student feedback, which occurs before, during and after the course. ACLT aims to resolve complaints quickly and simply.
- For the purposes of this policy, a concern is defined as a comment, either in conversation, writing or via social media, on the learning opportunities or student experience. When a concern is raised, it can represent the first stage of a complaint if left unaddressed.

It is anticipated that the majority of complaints are resolved at the first (informal) stage, or at the initial concern stage, with relatively few progressing to the second (formal) stage.

1.2 Scope of this policy

This Policy sets out the key principles and procedures which cover concerns and complaints about the quality of learning opportunities or the provision of a programme of study or related academic or administrative service.

This Policy does not cover:

- Appeals against the decisions of Assessment Boards or issues related to assessments (conduct or content), final results or concession applications (these are dealt with under the Appeals policy)
- Appeals against decisions taken under disciplinary proceedings (these are dealt with under the Student Disciplinary policy and Academic Misconduct policy)
- Appeals against contractual fee liability where there are mitigating circumstances that can be dealt with under the Course Fees & Payment of Fees policy (where fee liability is being appealed against due to service issues or ACLT communication, these can be investigated under this policy);
- Appeals against decisions taken regarding Learning Support provisions (these are dealt with under the Learning Support Agreement policy).

Any queries about the process and what is or is not covered by this policy should be directed to ops@acltraining.co.uk

This Policy may be used for both individual concerns or complaints and collective concerns or complaints. However, it is anticipated that collective concerns or complaints are normally more appropriately addressed via the student representative system. Individual students participating in a collective complaint are not eligible under this Policy to pursue an individual complaint about the same issue.

This policy applies to:

- The CLPQ and associated activities delivered online or in person
- Any apprenticeship programmes delivered by ACLT, including on programme learning, endpoint assessments (where applicable), workplace learning, and employer based activities.
- All staff (permanent, temporary, agency), contractors, visiting speakers, volunteers, board members, and employers involved with our apprenticeships.
- All learners/apprentices registered with ACLT, as well as applicants and alumni when engaging with our services.

2. Responsibility for this policy

Ultimate responsibility for the development of clear and effective processes and procedures associated with the maintenance of standards and quality assurance of academic provision and overseeing their application lies with the ACLT Board.

3.Expectation

ACLT has procedures for handling academic appeals and student concerns and complaints about the quality of learning opportunities, or the provision of a programme of study or related academic or administrative service; these procedures are fair, accessible and timely, and enable enhancement. These are outlined in the Assessment Regulations, Appeals policy and Student Complaints policy.

4. Key aims and principles

ACLT follows these key aims and principles:

- **Transparency** – ACLT provides details of who is responsible for dealing with the complaint at each stage of the process, and also provides information on what action can be taken if the resolution is unsatisfactory
- **Speed** – ACLT sets appropriate timescales for each stage of the process
- **Impartiality** – ACLT ensures that no person who has any direct interest in a complaint is involved in deciding its outcome – at the initial investigation or the review stage
- **Non-detriment** – ACLT ensures that no student suffers any disadvantage for having made a complaint in good faith – regardless of its outcome
- **Accessibility** – ACLT ensures that all students are able to access this Policy, regardless of disability or domicile
- **Enhancement** – ACLT ensures outcomes of concerns, complaints and appeals support the ongoing enhancement and improvement of student learning opportunities by learning from our processes.

5. Escalation Process for Apprenticeship Queries or Complaints

In accordance with DfE Funding Rules, ACLT provides a clear escalation route for apprentices and employers where a complaint cannot be resolved through ACLT's internal process.

- Apprentices and employers should first raise their concerns following the process detailed in the current policy (Stages 1 and 2).
- If a case remains unresolved after the completion of ACLT's internal process it may be escalated to the Department for Education (DfE) Apprenticeship Service Support:

Phone: 08000 150 600

Email: helpdesk@manage-apprenticeships.service.gov.uk

Full details of ACLT's internal complaints procedure, including timescales are set out in sections 6 and 7 of this policy..

6. Procedural approach

6.1 Responsibilities

ACLT's responsibility is to:

- follow the key aims and principles as shown above
- make students aware of its Student Complaints Policy
- acknowledge any formal complaint or request for review in writing and respond within a stated period of time, the entire complaint being resolved within 90 days of first receipt, where possible
- deal reasonably and sensitively with the complaint, including allocating the appropriate individuals to investigate the complaint
- take action where appropriate
- ensure that an accurate record is kept of any formal complaint and the outcome
- monitor and evaluate all formal complaints.

The student's responsibility is to:

- approach an appropriate member of staff or the Board to discuss any complaint informally with the aim of resolving the issues before bringing a formal complaint
- bring any formal complaint, in writing, to ACLT's attention promptly through ACLT Registry or Head of Operations (the student must submit the complaint themselves, unless they are unable to do so for some reason)
- explain the complaint as clearly and as fully as possible, including any action taken to date
- have read all pre-course and on-course terms and conditions as appropriate
- allow ACLT a reasonable time to deal with the matter.

6.2 Procedure

The complaints procedure consists of two stages:

- Stage 1: dealt with by Head of Operations
- Stage 2: dealt with by the ACLT Board Chair.

Exceptions to the normal Stage 1 and Stage 2 process:

- Where a complaint is made by a current member of ACLT staff against another member of ACLT staff, other than a Board Member, these regulations do not apply and the staff grievance procedure must be used.
- Where a complaint is made by a current member of ACLT staff against a Board member, these regulations do not apply and the complainant shall submit a written statement to the Chair of the Board who will invoke the appropriate procedure for

personal grievances set out in the supplementary grievance and disciplinary procedures involving holders of senior posts.

All complaints will be handled in confidence and without fear of recrimination. However, it may be necessary for the information disclosed within the complaint to be made known to a third party or parties in order to progress the complaint. Agreement to disclosure will be assumed unless the complainant specifies otherwise, using the complaint pro forma. Individuals against whom a complaint has been made will be advised of the nature of the complaint. Complainants are also referred to the section of this document regarding third party or anonymous complaints.

6.3 Stage 1 complaints process

The complaint shall be made in writing, setting out the remedy being sought to the address notified. (ACLT Registry: support@acltraining.co.uk)

Where the complaint is made in person, by telephone or by email, the complainant will be asked by the recipient to provide a personal email address and to put the complaint in writing.

The complaint must be submitted to support@acltraining.co.uk by the complainant:

- Where the complaint involves the Head of Operations, the recipient shall forward the details of the complaint to the ACLT Board Chair. The Chair shall determine who shall initiate an investigation.
- Where the complaint involves a member of the ACLT Board, the recipient shall forward the details of the complaint to the ACLT Board Chair.
- Where the complaint involves the Student Council see section 6.5.

The complainant shall receive a written acknowledgement by the person first receiving the complaint, as promptly as is practical, informing the complainant that the matter is being dealt with.

Complaints received more than 3 months after the event(s) in question shall not normally be investigated.

If a complaint is about a person, that person will be informed that complaint has been made and the nature of the complaint.

The complainant may be asked to attend a meeting with the person responsible for dealing with the complaint (or nominee) and any person(s) against whom a complaint has been made, in order to progress the investigation of the complaint and to seek a resolution

The complainant shall be advised in writing of the outcome of the investigation normally within 20 working days of the date of the written acknowledgement of the complaint.

If at any stage of the investigation it is found that there are grounds for the complaint:

- in the case of a complaint about an ACLT student, the student disciplinary procedure will be invoked

- in the case of a complaint about members of ACLT staff (other than holders of senior posts) made by persons other than current members of staff (when the staff grievance procedure applies), the staff disciplinary procedure will be invoked
- in the case of a complaint about holders of senior posts (other than the ACLT Board Chair) made by persons other than current members of staff (when the staff grievance procedure applies), the disciplinary procedure for holders of senior posts will be invoked
- in the case of general complaints, action shall be determined by the Head of Operations or other holder of a senior post.

This concludes stage 1 of the complaints process.

If the complainant still remains unsatisfied by the outcome, the complainant should follow stage 2 of the process by submitting a written request by email or letter to the ACLT Board Chair within 10 working days of receipt of the outcome of the investigation.

6.4 Stage 2 complaints process

Following the invocation of a stage 2 complaint:

- Upon receipt of a stage 2 complaint, the ACLT Board Chair may elect another member of the Board to investigate on his/her behalf as their nominee.
- The Board Chair (or nominee) shall, normally within 20 working days of the matter being reported to them, examine the evidence and shall be entitled to call for such papers, to examine such witnesses and to conduct such other enquiries into the matter as s/he may think fit. The Board Chair shall determine the nature of any subsequent action. The Board Chair may decide at this point that no further action is required in which case his/her decision is final and will conclude the ACLT's procedures. A "Completion of Procedures (CoP) letter" will then be issued to the complainant.

If the Board Chair considers there is foundation for the complaint, s/he may:

- in the case of a complaint about an ACLT student, invoke the student disciplinary procedure, which provides for a formal hearing;
- in the case of a complaint about members of ACLT staff (other than holders of senior posts or the ACLT Management Board Chair) made by persons other than current members of staff (when the staff grievance procedure applies), invoke the staff disciplinary procedure;
- in the case of a complaint about holders of senior posts (made by persons other than current members of staff (when the staff grievance procedure applies), invoke the disciplinary procedure for holders of senior posts;
- in the case of a complaint about general matters, the Board Chair may decide to respond personally to the complainant at the conclusion of the investigation. In such instances, the Board Chair shall make this known at the point at which it is forwarded to the Head of Operations for investigation. Exceptionally, the Board Chair may refer

the matter to an independent person appointed by the Board who shall investigate and report to the Board. Responsibility for determining and implementing any remedy shall rest with the Board. The Board's decision shall be final and there shall be no provision for appeal against that decision. This will conclude the ACLT's procedures and a CoP letter will then be sent to the complainant;

In the case of a complaint in relation to the Student Council as a body, invoke the procedure set out in section 6.5 below: Role of the Board Chair

The Board Chair (or nominee) will conduct a further investigation (stage 2) using the process set out above and advise the complainant of the outcome, normally within 20 working days of the matter being reported to them. This will conclude the ACLT's procedures. A CoP letter will then be issued to the complainant.

6.5 Exceptions to the above processes

Role of the Board Chair

Complaints about the conduct of individual members of the ACLT Board whilst acting in that capacity other than the Chair of the Board shall be made in writing to the Board Chair for review or determine such other action as is deemed appropriate. The complainant will be informed in writing of the outcome of the review.

If a complainant who has made a complaint in relation to the Student Council remains unsatisfied, the Board shall examine the evidence and shall be entitled to call for such papers, to examine such witnesses and to conduct such other enquiries into the matter as s/he may think fit. The Board Chair shall determine the nature of any subsequent action, following consultation where appropriate, and so advise the complainant. The Board Chair may decide at this point that no further action is required in which case his/her decision will be final and will conclude the ACLT's procedures.

A CoP letter will then be issued to the complainant.

Role of the ACL Council regarding complaints involving the Board Chair

The Chair of the ACL Council shall follow the procedures set out in stage 1. This process will involve one stage only, at the end of which a CoP letter will be issued.

In the case of a general complaint involving the ACLT Board Chair, the Chair of the ACL Council shall consider the detail of the complaint and determine the nature of any subsequent action, which may include reference to an independent person appointed by the ACL Council.

In the case of a complaint against the Head of Operations, the ACLT Board Chair shall proceed to investigate or whether the complaint appears to be vexatious or malicious: the Chair shall (on behalf of the ACLT Board) write to the complainant informing them of the procedures to be adopted, or the rejection of the allegations and the reasons for this rejection; anonymous allegations will be treated on their merits, but may be rejected on this ground alone if the ACLT Board Chair deems it appropriate.

The Board Chair shall inform the complainant of the decision of the Board when the final decision is made, which shall incorporate a CoP letter.

The Board Chair shall appoint a current Board Member and two other persons, to form an ad hoc committee of the Board to consider the allegation.

The Board Chair shall consider the recommendation of the ad hoc committee and decide an appropriate course of action; if, as a result of the findings of the ad hoc committee, a Special Committee is convened it must not include members of the ad hoc committee.

The Chair of the ad hoc committee shall invite the Board Chair to submit written evidence in reply to the allegation.

The Chair of the ad hoc committee, after consulting the other members, shall recommend to the Board Chair an appropriate course of action; this may include, but shall not necessarily be limited to rejection or, where it appears that the ACLT may need to consider suspension or dismissal of the Head of Operations. Before making the final recommendation the Chair of the ad hoc committee may recommend to the ACL Chair that further investigation be made, and/or further evidence sought, and/or a hearing with the complainant and the Head of Operations, the procedures for these actions shall be determined according to the nature of the case but shall be agreed with the complainant if possible.

This procedure cannot be used to raise issues already covered in, nor to replace the normal procedures for employment tribunals or disciplinary hearings.

ACLT shall attempt to complete the investigations of the ad hoc committee within two calendar months of the receipt of the complaint; if there are good reasons why a longer period appears necessary this shall be communicated to the complainant.

6.6 Procedure for complaints involving the Student Council

If a complaint is received against a student or students of the ACLT whilst representing the Student Council, or where the complainant is dissatisfied in their dealings with the Student Council or feel that they have been unfairly disadvantaged by exercising their right not to be a member of the ACLT Student Council, the matter shall be referred to the Chair of the Student Council for investigation. If there appears to be a substantive case, the Chair of the Student Council (or nominee) will invoke the ACL Student Council Complaints and Appeals Procedure.

If the complaint concerns the Chair of the Student Council, the ACLT complaints procedure shall apply (see section 5.5 above).

If the complaint is in relation to the behaviour of the Student Council as a body, the matter shall be referred to the Board Chair direct.

6.7 Third party or anonymous complaints

Complaints made in writing by a third party or anonymous source will normally be given consideration at the discretion of ACLT. However, in exercising this discretion the factors to be taken into account will include:

- the seriousness of the complaint
- the likelihood of confirming the allegation from attributable sources

Anonymous complaints made against individuals will not normally be progressed.

6.8 Vexatious, frivolous or untrue complaints

If an individual makes a complaint in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. However, if the investigation of the complaint reveals the allegation to be vexatious, frivolous or untrue in nature ACLT reserves the right to dismiss the complaint. The complainant will be notified of this decision in writing as soon as possible. The complainant will be informed that complaints that are found to be vexatious, frivolous or untrue in nature are deemed to be an abuse of process. If the complainant is a student or a member of staff and the complaint is deemed to be vexatious and/or untrue disciplinary action will be taken against them. If the complainant is a student or member of staff and they persists in making frivolous complaints disciplinary action may be taken against them.

6.9 General provisions

If the normal time scale (20 working days from the date of the written acknowledgement of the complaint) does not allow for full or appropriate investigation of the complaint and response to the complainant then the time limit may be extended by the person responsible for dealing with the complaint and notified to the complainant.

In all cases the complaint shall be formally and sensitively acknowledged in writing by the person first receiving it, as promptly as is practical, and informing the complainant that the matter is being dealt with.

Throughout this procedure the Board Chair and Head of Operations may nominate a senior member of the staff or Board to act on their behalf in relation to any complaint.

Complainants may seek advice on procedural matters from the Head of Operations.

ACLT will meet any reasonable and proportionate incidental expenses necessarily incurred by a successful complainant.

7. Policy approval and review

Policy owner: Head of Operations

Approved by: Board of Directors

Senior responsible officer: Board Chair

Date approved: 16 January 2026

Effective from: 16 January 2026

Last review date: 16 January 2026

Next scheduled review: 16 January 2027

This policy applies to both the CLPQ and any apprenticeship provision delivered by ACLT, including online delivery, employer-based learning and any in-person activity. The policy will be reviewed at least annually, or sooner in response to changes in legislation, regulatory requirements, delivery model, or following any significant incident.

Name: Tracy Savage

Role: ACLT Board Chair

Date: 16 January 2026

Appendix A List of key staff

| | | |
|-------------------|-----------------------------|--|
| Tracy Savage | | Chair of the Board of Directors |
| Estelle Ritter | ops@acltraining.co.uk | Head of Operations |
| Madeleine Jenness | education@acltraining.co.uk | Head of Business (Education and Training Policy) |
| Terri Gurrell | support@acltraining.co.uk | Course Coordinator |