

SPI Learners' Complaints Policy and Procedure



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ST PADARN'S INSTITUTE

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2	04 February 2021	Kathryn Delderfield	
3	18 June 2022	Kathryn Delderfield	
3.1	21 August 2023	Gareth Longden	<ul style="list-style-type: none"> Change of name to SPI Learner's Complaints Policy and Procedure to reflect fact that complaints about academic provision can be brought under this policy. Appeals against marks are dealt with under the Academic Appeals policy.

4	May 2025	Kathryn Delderfield	<ul style="list-style-type: none"> • Much of the policy has been rewritten to reflect learning from recent complaints, particularly in order to facilitate early resolution.
4.1	15 December 2025	Kathryn Delderfield	<ul style="list-style-type: none"> • Minor revisions made to the process based on Common Awards Advice.
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SPI Learners' Complaints Policy and Procedure

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2. Introduction and Scope of Policy

While we aim to provide an excellent service and foster an inclusive, supportive community we realise that from time-to-time issues may arise. These may be between learners, learners, and staff or with St Padarn's delivery, processes, and administration (issues between staff are dealt with under the Representative Body of the Church in Wales Grievance policy). It is important that problems are resolved as quickly and as fairly as possible. This policy describes the normal policy and procedures for dealing with issues raised by learners. Please note that it does not cover issues covered by the Academic Appeals Policy¹.

Complaints may relate to (but are not restricted to) the following matters:

- a. The oversight, arrangements for, or delivery of, teaching or assessment for a learner's academic progress
- b. Matters relating to learner support or the learner experience
- c. Support services relating to the programme
- d. Information or publicity in relation to programmes
- e. Learning resources, teaching spaces
- f. Behaviour of learners or staff which amounts to harassment, bullying, discrimination, or victimisation.
- g. Behaviour of learners or staff which contravene St Padarn's policies or Code of Conduct.

Sometimes, depending on the nature of the complaint, it may be more appropriate for the issue to be dealt with under another policy, for example a complaint about a safeguarding issue, or certain types of complaints against staff.

¹ The Academic Appeals Policy addresses complaints about the award of marks for assessed work.

This policy only covers issues by which you have been directly affected. It also only covers complaints over issues which have happened within the bounds of St Padarn's responsibilities.

The complaints process cannot be used by one candidate for ministry to comment on another's suitability for ordination, it can only be used to deal with something which has directly affected you.

3. Guiding Principles

- a. We aim to ensure that complaints are dealt with fairly, showing dignity and respect to all involved.
- b. If you make a complaint, you will not be disadvantaged as a result of making the complaint, other than if the complaint is found to be frivolous, vexatious, or malicious. Making a complaint will not have a detrimental effect on your marks, treatment or, in the case of those training for licensed ministry, the act of making a complaint will not be prejudicial in determining whether licensing should proceed.
- c. We aim to ensure that the processes are transparent, conducted in a timely manner by appropriately independent individuals.
- d. We expect all involved in the complaint to cooperate so that complaints can be properly investigated.
- e. We understand that going through the complaints process can be stressful for all involved and so we endeavour to ensure that people are supported throughout, whether you are the person making the complaint, have had a complaint made against you or are investigating the complaint. You can seek advice and support from the Learning Services Manager, Senior Coordinator, or their Learner Representative.
- f. If you make a complaint which St Padarn's considers frivolous, vexatious, or malicious we may terminate the complaint. Where a complaint is found to have been brought with frivolous, vexatious, or malicious intent, this may be grounds for disciplinary action.

4. Confidentiality

St Padarn's will fulfil its obligations under relevant data protection regulations and the Equality Act 2010 in relation to any information shared about the complaint.

All parties involved in the complaint will be reminded of the confidentiality associated with the procedures outlined below. Information associated with the case will be disclosed on a need-to-know basis.

Where there is risk of harm, or a criminal offence has been alleged, information may need to be referred on to the safeguarding team and/or police, or other relevant body.

For more information about how we process the information you give us please visit our privacy statement [here](#).

5. Early Resolution

If you have a concern or an issue, first of all consider whether this can be raised through the St Padarn's normal feedback processes, or, if you are on an academic or Formation for Licensed Ministry programme, through your learner representative. St Padarn's takes learner feedback very seriously, and many issues around module content, assessments and provision of services can be resolved through this route.

If you feel your concern has not been properly addressed through the feedback processes or is about something not covered by the feedback processes, such as an issue with another learner, then St Padarn's early resolution process aims to try and resolve issues quickly and with the minimum of stress. You can approach one of the following staff members who will facilitate informal resolution:

- Senior Coordinator
- Director of Formation
- Learning Services Manager

They will listen to you and in conversation with you identify the most appropriate way to deal with your issue. This could include:

- Facilitating a conversation

- Providing information or explanations which might answer the concern
- Where the issue is straightforward, they may be able to take action to resolve it
- Arranging mediation
- An apology

The initial conversation with the staff member will take place either in person or on-line as soon as possible, but **no later than 10 working days** of you raising an issue. Any action will be taken **within 15 working days** from the date of that conversation.

If the issue cannot be resolved through the early resolution process, or it is too complex, then a formal complaint can be raised.

The staff member who facilitates the early resolution will keep a record and share it with you.

6. Formal Complaint

If a complaint cannot be settled through the early resolution process, you can raise it formally by submitting the online complaint form [St Padarn's Institute Formal Complaint Form – Fill in form](#) .

If you wish, you can ask the staff member who has assisted with the early resolution stage to help you complete the form. If the complaint is against the Principal, then the form in Appendix 1 needs to be completed and submitted to the Chair of the Executive Board of St Padarn's at ChiefExec@cinw.org.uk .

If a formal complaint has not been raised through the Early Resolution process and it would have been appropriate, the complaint may be referred back to that level.

A formal complaint should be raised within one month of the end of the early resolution process and normally no more than six months after the main issues that the complaint relates to occurring. Complaints received after these deadlines

will not be dealt with unless there is evidence to show good reasons why the complaint was not made earlier.

You should include any evidence you have to back up your complaint such as emails or details of witnesses.

7. Anonymous complaints

Anonymous complaints will not usually be dealt with under the Learner Complaint policy as this has the potential to create unfairness within the process, particularly where allegations are made against another individual.

There are exceptional circumstances when the identity of the person making the complaint will not be shared with the person against whom the complaint is made. If you want to make a complaint on this basis then please make this clear on the form. This may however make it more difficult to investigate the complaint thoroughly.

8. Group Complaints

Where a number of learners are affected by the same issues it is possible to make a group complaint under the following conditions:

- a. The group must nominate a spokesperson to represent the group. Each member of the group will need to consent to the appointment of this spokesperson in writing, the spokesperson must also agree.
- b. Each member of the group has to have been directly affected by the issues raised in the complaint.
- c. The group agrees to collectively agree whether or not they accept the outcome of the complaint.
- d. The spokesperson submits evidence on behalf of the group members.

- e. Any request to review the outcome of the complaint is made through the spokesperson, based on the collective decision of the group.

9. Complaints Procedure

9.1 Evaluating the Complaint

Your complaint must be made using the formal complaint form.

The Principal (or Chair of Executive Board (Chair of EB) if appropriate) will undertake an initial evaluation to check that the complaint:

- Is submitted and being considered under the correct procedures
- Is submitted within the deadlines
- Is in the correct format

If your complaint needs to be taken forward under the formal processes, the Principal will appoint an appropriately independent member of the Representative Body of the Church in Wales staff to be the case officer to investigate your complaint. This will usually be one of the Senior Leadership Team of St Padarn's. If the Principal is not available or has already had involvement, then the Chair of the Executive Board, or their nominated representative, will appoint the investigating member of staff. It may be deemed appropriate on occasion to appoint a suitable independent person rather than a member of staff.

The person appointed to investigate will be called the Case Officer. The person making the complaint will be notified who their Case Officer will be **within 14 days** of the complaint being received.

The Case Officer will determine whether:

- Mediation may be appropriate
- Your complaint needs to be referred back to the early resolution stage
- If the complaint lacks evidence, is frivolous, vexatious, or malicious and should not be taken forward.

9.2 Investigating the Complaint

9.2.1 The Case Officer

The Case Officer will start the investigation within **7 days** of you being notified that they have been appointed.

The Case Officer will consider the evidence you have provided. They are likely to meet with you, and may also talk to other individuals who may be able to help bring clarity to the issue. If the complaint is against another person, the investigation is also likely to involve an interview with that person.

9.2.2 Meeting procedure

Whether you are making a complaint or have had a complaint made against you the procedure for meetings which take place as part of the investigation are the same.

Where possible meeting will be face to face. Given the dispersed nature of St Padarn's it is not always possible to arrange face to face meetings within a reasonable time frame and so in some cases meetings may need to be conducted on-line.

The case officer will arrange a time which is mutually convenient, this will need to be within the constraints of the time frame for the investigation. You have the right to bring someone along with you to a meeting with the Case Officer to support you. This could be another learner, staff member or, in the case of learners on an MA programme, a Durham Students' Union Representative. The person who accompanies you cannot be someone directly involved in the complaint or a relative. This person is not there to act as a witness or to corroborate your evidence, but they can help you express yourself or ask questions on your behalf.

Except in exceptional circumstances, if the complaint is against a person, then that person will be given a summary of the complaint prior to the meeting. Every effort will be made to keep meetings within an hour. Where this is not possible there will be a break of a minimum of ten minutes at the end of each hour.

There will be a note taker at the meeting.

Notes taken at the meeting will be sent to the people involved to be fact checked. You can notify the case officer of anything in the notes that you think is inaccurate, additional extra information at this stage will not normally be accepted unless it has been requested by the Case Officer.

9.2.3 Adjudicating the Complaint

The Case Officer will consider all evidence in order to determine the outcome of your complaint. In complex cases the Case Officer may consult with relevant senior staff or experts.

The Case Officer will write a report on the complaint detailing their findings, the outcome and their recommendations. The report will be sent to the person making the complaint **within 30 days** of the start of the investigation.

If the complaint is against another individual, they also will usually be sent a copy of the response.

10. Outcomes

There may be a number of outcomes to an investigation into a complaint:

- a. The complaint may be rejected.
- b. The complaint may be partially upheld, in which case appropriate action will be taken by the Principal (or Chair of the EB if the complaint is against the Principal). The report may make recommendations on appropriate actions for consideration.
- c. The complaint may be upheld, in which case appropriate action will be taken by the Principal (or Chair of the EB if the complaint is against the Principal). The report may make recommendations on appropriate actions for consideration.

The report will be sent to the Principal (or Chair of the EB if the complaint is against the Principal) who will note the outcome and will assess the recommendations and ensure that the appropriate action takes place. Where a

complaint against an individual is upheld, this may include invoking the disciplinary process.

The Case Officer will prepare a document for the Senior Leadership Team to ensure lessons are learnt from the complaint to enhance the learner experience. Even where a complaint is not upheld there may be learning that can be drawn from the experience.

If a complaint is upheld against a candidate for ministry or a New Licensed Minister, the summary will also be passed onto their personal tutor or the programme leader respectively as it will form part of the evidence relating to that person's formation and development. Similarly, if a candidate or Newly Licensed Minister raises a frivolous, vexatious, or malicious complaint it may also form part of the reporting on them.

11. Review Procedure

If you feel that the matter has not been adequately resolved, you can request a review.

You can ask for a review on the following grounds:

- a. There were irregularities in the outworking of the complaint's procedure, which are of a nature as to cause reasonable doubt whether the same decision would have been reached had they not occurred.
- b. The existence of new evidence which, for compelling reasons, you were not able to provide earlier in the process.
- c. The outcome is unreasonable.

You must make this request by contacting the Principal (or Chair of the EB if the complaint is against the Principal) in writing within **14 days** from notification of the outcome.

The Principal (or Chair of the EB if the complaint is against the Principal) will consider the evidence and come to a decision. In the process they may consult with the validating universities or the Ministry Bishop. There will not normally be further meetings with you as part of this process. They may come to one of the following decisions:

- a. To uphold the original complaint outcome.

- b. To reverse the original complaint outcome in part.
- c. To reverse the original complaint outcome in its entirety.
- d. For learners on a UWTSD accredited programme, the Principal may choose to refer the complaint to UWTSD for review.

The decision will be communicated **within 28 days** of the request for review, and you will receive a **Completion of Procedures Letter** from St Padarn's. If your complaint is partially upheld, you can ask for a Completion of Procedures Letter if you want one. The decision of the Principal (or Chair of the EB if the complaint is against the Principal) ends the St Padarn's Complaints process.

Further Right of Appeal

i. UWTSD Accredited Programmes²

You may submit a complaint to UWTSD at any point even if you have not been through the rest of the St Padarn's complaints process. UWTSD may refer your complaint back to St Padarn's for it to go through the St Padarn's Complaints Procedure, depending on the nature of the complaint.

If you have been through the St Padarn's complaints process and are unhappy about the resulting decision you may raise a complaint directly to UWTSD. Further information can be found at [Procedures for Academic Appeals, Complaints and Other Student Cases | University of Wales Trinity Saint David](#)

ii. Common Award (Durham University) Accredited Programmes³

If you have been through the St Padarn's complaints process and are unhappy with the resulting decision you have a right to request a Review of the Formal Stage Investigation Report by directly contacting Durham University Common Award's office (common.awards@durham.ac.uk) **within 14 days** of receiving the investigation report. Details of what sorts of complaints may be submitted are found in section B – What is this Procedure for? section of the Common Awards Complaints Procedure.

² Theology for Discipleship, Ministry and Mission Cert HE, DipHE, BTh; Workplace Mission and Ministry CertHE

³ All PG Certs, PGDips and MAs

iii. Submitting a complaint to the Office of the Independent Adjudicator for Higher Education (OIAHE)

If you are on a higher education accredited course, you may be able to appeal to the **Office of the Independent Adjudicator for Higher Education**. Any complaint must be submitted **within 12 months** of the Completion of Procedures letter. You can find more information about Completion of Procedures Letters and when you should expect to receive one here: <https://www.oiahe.org.uk/providers/completion-of-procedures-letters> More information about whether a complaint can be made and how to go about making such a complaint can be found on the OIA website [How to complain to us - OIAHE](#)

12. Delays

Every effort will be made to operate within the timeframes laid out in this policy. If there are exceptional circumstances which mean it is not possible to respond to your complaint within the timeframe stated in this policy, an explanation will be given for the delay and all parties concerned will be informed when a response can be expected.

Appendix 1. Formal Complaint Form

Please complete all the questions below. The complaint can only be investigated when the **online form** has been fully completed.

Formal Complaint Submission	
Name	
Date	
Programme	
Email address	
Date or time period of the matter you wish to complain about	
Brief summary of your complaint	

Please give details of any steps taken to resolve your complaint. If no steps have been taken, please explain why.
Please list any evidence you are attaching in support of your claim e.g., emails
What outcome are you seeking?
I declare the information given in this form is true, to the best of my knowledge, and I would be willing to answer further questions relating to it if necessary.
Signed _____ Date _____

Appendix 2. Flowchart for Formal Complaints Procedure

