Foreword

The University of Stirling seeks to consistently deliver an excellent student experience and high quality service provision within its broader community. The University recognises that situations may occasionally arise where a member of its community feels that the level of service they have received has not met expectations. This Complaints Handling Procedure (CHP) sets out the process that the University follows where a complaint is received. It reflects the University’s commitment to: dealing effectively with complaints; seeking to resolve issues of dissatisfaction as close to the initial point of contact as possible: and where appropriate, conducting thorough and fair investigations so that robust decisions can be made on the outcomes of complaints.

Resolving complaints early ensures that any issues that arise are dealt with in a timely way, which in turn facilitates the time of academic and professional service staff being spent on key University activity, thus contributing to the continued enhancement of the experience of members of our community.

Universities in Scotland are required to operate complaints processes on the basis of The Scottish Higher Education Model Complaints Handling Procedure published by the Scottish Public Services Ombudsman (SPSO). The University of Stirling CHP has therefore been developed in line with this model, and the University consistently seeks to handle and learn from complaints in line with best practice identified by the SPSO and within the Higher Education sector.
**Introduction**

**What is a complaint?**

For the purpose of this procedure, a complaint may be defined as: an expression of dissatisfaction by one or more individuals about the standard of service, action or lack of action by or on behalf of the University.

A complaint may relate, for example, to:
- the quality or standard of service
- failure to provide a service
- the quality of facilities or learning resources
- treatment by or attitude of a staff member, student or contractor
- inappropriate behaviour by a staff member, student or contractor
- the failure of the University to follow an appropriate administrative process

The list above is intended only as a broad outline and the list of categories to which a complaint may relate is not exhaustive. However, not every query or concern raised with the University is a complaint.

For example, the following are not complaints:
- a routine, first-time request for a service
- a request under the Freedom of Information (Scotland) Act or Data Protection Act
- a request for information or an explanation of policy or practice
- a request for compensation only
- a response to an invitation to provide feedback through a formal mechanism such as a questionnaire or committee membership will generally not be treated as a complaint
- an insurance claim
- an issue which is being, or has been, considered by a court or tribunal
- an attempt to have a complaint reconsidered where the University’s procedure has been completed and a decision has been issued
- a grievance by a member of staff which is eligible for handling through the grievance procedure
- an appeal about an academic decision/judgement on assessment or admission

These matters will be dealt with under the appropriate process rather than under the CHP. It should be noted that some situations may involve a number of issues, some of which may be complaints and some others which are not complaints. The University assesses such matters on a case by case basis to determine the most appropriate approach to ensuring that all aspects of the matter are considered and dealt with effectively and efficiently. Where a complaint relates to the conduct of a student of the University, this will normally be handled through Ordinance 2, the Code of Student Discipline which sets out the University’s student disciplinary process. Where this is the case, the complainant will be advised of this.

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1. Dealt with in line with the University’s FOISA and data access arrangements
2. Considered in line with the University’s Ordinance 68 (University staff)
3. Dealt with through the University’s specified appeals process.
Who can make a complaint?
The University of Stirling’s CHP is relevant to complaints from anyone who receives, requests or is affected by the University’s services.

This includes, although is not limited to:
- students;
- members of the public, where they have a complaint about matters which are (or which were at the time the issue arose) the responsibility of the University; and
- members of the public who are applying for admission to the University and whose complaint does not relate to academic judgement.

The same core procedure for investigating complaints is adopted by the University regardless of whether the complaint is raised by a student, member of the public or applicant.

The University recognises that sometimes individuals may be unable or reluctant to make a complaint on their own and therefore accepts complaints brought by third parties, as long as the individual affected has given their express, written personal consent for this to the University, in line with the requirements of the General Data Protection Regulations (GDPR).

Anonymous Complaints
The University will consider complaints submitted anonymously if enough information is provided in the complaint to enable the University to make further enquiries. If, there is insufficient information to enable further action to be taken, the University may decide not to pursue it further. However a suitable consideration of the issues raised will be undertaken, and the University will record the complaint to facilitate any internal reflection and/or action that may be appropriate.

In all instances where an anonymous complaint contains serious allegations, it will be referred in the first instance to the Academic Registrar or Deputy Secretary for consideration. A final decision not to pursue an anonymous complaint will normally be taken by the Academic Registrar or Deputy Secretary.

Complaints involving more than one area of the University
If a frontline complaint relates to two or more areas of the University, a lead area responsible for dealing with the complaint as a whole will be agreed and the complaint will be fully addressed in a single response. The complainant will be advised of who will deal with their complaint.

Complaints involving other organisations/contractors providing a service on behalf of the University
If an individual complains about the service of another organisation, in respect of an issue in which the University has no involvement, the individual will be advised to contact the other organisation directly in order to raise their complaint.
Where a complaint relates to a University service and the service of another organisation the complaint must be handled through the University of Stirling CHP in so far as this is possible.
Where the University undertakes such an investigation, if enquiries to an outside organisation are required, care is taken to comply with data protection legislation and the guidance on handling personal information.
Such complaints may include, for example:

- a complaint made in relation to provision of third-party services, for example IT systems;
- a complaint made about a service that is contracted out, such as catering services;
- a complaint made about a student loan where the dissatisfaction relates to the service the University provided and the service the Student Awards Agency for Scotland provided.

**Time limit for making complaints**

Complaints should be raised as soon as the matter to which the complaint relates arises in order to enable prompt consideration/investigation and swift resolution. The CHP sets a time limit of six months to raise a complaint, starting from when the complainant first became aware of the problem, unless there are special circumstances for requesting consideration of a complaint beyond this time.

Beyond the six-month time limit, we will exercise discretion in the way that the time limit is applied. This will take account of the time limit within which a complainant can normally ask the SPSO to consider complaints, which is twelve months from when the person first became aware of the issue about which they are complaining.

**Supporting the complainant**

Anyone who receives, requests or is directly affected by the services the University provides has the right to access the University’s CHP. Other complainants may have specific needs which the University will seek to support to ensure easy access to the CHP by making reasonable adjustments to help the complainant.

Further information on how to make a complaint, together with details of support services which can provide helpful support to those who wish to pursue a complaint with the University are provided in the following document:

*The University of Stirling Complaints Handling Procedure – Guide to Making a Complaint*

**Associated Policies**

University policies which may be relevant to a complaint, and therefore the Complaints Handling Procedure are listed below:

- [Equality and Diversity](#)
- [Anti-bullying and harassment](#)
- **Freedom to Speak Up (Whistleblowing)**: This policy addresses matters that are raised in the public interest rather than for the purpose of redress of personal concern such as grievance or complaints.
The Complaints Handling Procedure

Introduction

The University of Stirling CHP is intended to provide an efficient, simple and streamlined process with a strong focus on early resolution by staff. The procedure involves up to two stages:

- **Stage One: Frontline resolution:**
  Seeks to resolve straightforward complaints swiftly and effectively at the point at which the complaint is made, or as close to that point as possible.

- **Stage Two: Investigation:**
  Is appropriate where a complainant is dissatisfied with the outcome of frontline resolution, or where frontline resolution is not possible or appropriate due to the complexity or seriousness of the case.

Figure 1 below is an extract from *The Scottish Higher Education Model Complaints Handling Procedure* published by the SPSO, and sets out a summary of the CHP.

**Figure 1**

<table>
<thead>
<tr>
<th>FRONTLINE RESOLUTION</th>
<th>INVESTIGATION</th>
<th>INDEPENDENT EXTERNAL REVIEW (SPSO or other)</th>
</tr>
</thead>
<tbody>
<tr>
<td>For issues that are straightforward and easily resolved, requiring little or no investigation.</td>
<td>For issues that have not been resolved at the frontline or that are complex, serious or 'high risk'.</td>
<td>For issues that have not been resolved by the service provider.</td>
</tr>
<tr>
<td>‘On-the-spot’ apology, explanation, or other action to resolve the complaint quickly, in five working days or less, unless there are exceptional circumstances. Complaints addressed by any member of staff, or alternatively referred to the appropriate point for frontline resolution. Complaint details, outcome and action taken recorded and used for service improvement.</td>
<td>A definitive response provided within 20 working days following a thorough investigation of the points raised. Responses signed off by senior management. Senior management have an active interest in complaints and use information gathered to improve services. Complainants who remain dissatisfied after an investigation has been completed by the Institution have the right to ask the SPSO to review their case (see right).</td>
<td>Complaints progressing to the SPSO will have been thoroughly investigated by the service provider. The SPSO will assess whether there is evidence of service failure or maladministration not identified by the service provider.</td>
</tr>
</tbody>
</table>

Note: For clarity, the term ‘frontline resolution’ refers to the first stage of the complaints process. It is not intended to reflect any job description within the Institution; rather it refers to the process which seeks to resolve complaints as soon as possible.
Stage One: Frontline Resolution – to be completed within 5 working days

Anyone who has a complaint is encouraged to raise it initially at the point of, or as close to the point of, becoming aware of it as possible and to raise it with the Faculty or Service Area in which the issue arose. Complaints at this stage may be made face-to-face, by phone, in writing or by email.

The purpose of frontline resolution is to attempt to resolve as quickly as possible complaints which are straightforward and require little or no investigation. Complaints at this stage of the process may be addressed by any appropriate member of staff who is relevant to the matter covered in the complaint, and may be handled by way of a face-to-face or phone discussion with the complainant, or a letter or email of response. Resolution may be achieved by providing an on-the-spot explanation of why the issue occurred and/or an apology and, where possible, what will be done to prevent the same issue occurring in the future.

Members of staff to whom complaints are made will consider some key questions:

- Is this a complaint or should the individual be referred to another procedure?
- What specifically is the complaint (or complaints) about and which area(s) of the University is/are involved?
- What outcome is the complainant hoping for and can it be achieved through the complaints procedure?
- Is this complaint straightforward and likely to be resolved with little or no investigation?
- Can the complaint be resolved on the spot by providing an apology / explanation / alternative solution?
- If I cannot help, can another member of staff assist in seeking a frontline resolution?
- What assistance can be provided to the complainant in taking this forward?

If responsibility for the issue being complained about lies in the staff member’s area of work, every attempt will be made to resolve the problem at source. If responsibility lies elsewhere, the staff member receiving the complaint will liaise with the relevant area or the Complaints Team rather than simply passing the complainant on to another office.

Extension to the five day timeline

We expect that frontline resolution should normally be completed within 5 working days, though a resolution may be achieved more quickly. In exceptional circumstances a short extension of time may be necessary to increase the possibility of resolving the complaint at the frontline resolution stage (for example, by obtaining information from other areas where no single area of the University is responsible for the issue(s) being complained about). Where an extension is required this must be signed off by the Academic Registrar. The complainant must be told of the reasons for extending the deadline and advised of the new timescale for resolution. The maximum extension which can be granted is 5 working days (i.e. not more than 10 working days in total from the date of receipt of the complaint).

Closing the complaint at the frontline resolution stage

We will communicate the outcome to the complainant by face-to-face communication, or by phone, or in writing or by email. Where the response is provided through face-to-face or phone communication, this will be followed up with a written version of the response which will be sent to the complainant by post or email. Our response to the complainant will address all the topics for which we are responsible, and explain the reasons for the decision. Once a decision has been issued, the record of the complaint will be made and retained within the complaints record system which is maintained by the Complaints Team, including details of the decision reached. The complaint will then be closed.
Stage Two: Investigation – to be completed within 20 working days

These complaints may already have been considered at the frontline resolution stage, or they may be complaints identified upon receipt as appropriate for immediate investigation.

A complaint will be moved to the investigation stage when:

- Frontline resolution was attempted, but the complainant remains dissatisfied. This may be after the case has been closed following the frontline resolution stage;
- The complainant refuses to recognise or engage with the frontline resolution process and is insistent that the issue be addressed at Stage 2;
- The issues raised are complex and will require detailed investigation;
- The complaint relates to issues that have been identified by the University as high risk or high profile.

Special attention will be given to identifying complaints considered high risk /high profile, as these may require particular action or may raise critical issues requiring direct input from senior management. Potential high risk /high profile complaints may:

- Involve a death or terminal illness;
- Involve serious service failure, for example major delays in service provision or repeated failures to provide a service;
- Generate significant and on-going press interest;
- Pose a serious operational risk to the University;
- Present issues of a highly sensitive nature.

Where it is clear that a complaint will be immediately considered at the investigation stage, the complainant will be encouraged to complete the appropriate complaint form (www.stir.ac.uk/complaints) to provide full details of the complaint and any relevant documentation. If they choose not to write it down and would prefer to complain in person, the complaint form can be completed with them and a letter to confirm the scope of the complaint issued to them.

The purpose of conducting an investigation is to establish all of the facts relevant to the points made in the complaint and to provide a full, objective and proportionate response to the complainant that represents the University’s definitive position.

What we will do when we receive a complaint for Stage 2 Investigation

We will allocate the complaint to an investigator. We will be clear from the start of the investigation stage exactly what is being investigated, and ensure that both the complainant and the complaint investigator understand the scope of the investigation.

In discussion with the complainant, three key questions should be considered:

1. What specifically is the complaint (or complaints)?
2. What does the complainant hope to achieve by complaining?
3. Do the complainant’s expectations appear to be reasonable and achievable?

If the complainant’s expectations appear to exceed what the University can reasonably provide or are not within the University’s power to provide, the complainant will be advised of this as soon as possible in order to manage expectations about possible outcomes.

Details of the complaint must be recorded on the complaints record system which is maintained by the Complaints Coordinator. Where the complaint has been through the frontline resolution stage this must be shown in the complaints log. At the conclusion of the investigation the log must be updated to reflect the final outcome and any action taken in response to the complaint.
Timelines
The following deadlines will be used for cases at the investigation stage of the CHP:

- We will acknowledge complaints in writing within three working days;
- We will provide a full response to the complaint as soon as possible but not later than 20 working days from the time that the complaint was received for investigation.

Extension to the timeline
Not all investigations will be able to meet this deadline; for example some complaints are so complex that they will require careful consideration and detailed investigation beyond the 20 working days timeline. Where there are clear and justifiable reasons for extending the timescale, revised timescales will be set on any extended investigation, with the agreement of the complainant. If the complainant does not agree to an extension but it is unavoidable and reasonable, then the Academic Registrar or Deputy Secretary must consider and confirm the extension. In such circumstances, the complainant must be kept updated on the reason for the delay and given a revised timescale for bringing the investigation to a conclusion. It is expected, however, that this will be the exception and that the University will always strive to deliver a definitive response to the complaint within 20 working days.

Where an extension has been agreed, this will be recorded appropriately and the proportion of complaints that exceed the 20 working day-limit will be evident from reported statistics.

Closing the complaint at the investigation stage
The outcome of the investigation will be communicated to the complainant in writing. The decision, and details of how and when it was communicated, must be recorded on the complaints record system which is maintained by the Complaints Coordinator. The decision will also advise the complainant about:

- their right to ask the SPSO to review the complaint;
- the time limit for doing so how to contact the SPSO;
- how to contact the SPSO.

Independent external review and the Scottish Public Service Ombudsman (SPSO)
Once the investigation stage has been completed, if the complainant remains dissatisfied, he/she is entitled to ask the SPSO to look at their complaint. The SPSO considers complaints from people who remain dissatisfied at the conclusion of the University’s CHP. The SPSO looks at issues such as service failure and maladministration (administrative fault) as well as the way the University has handled the complaint.

Information about the SPSO
The Scottish Public Services Ombudsman (SPSO) is the final stage for complaints about public services in Scotland. This includes complaints about Scottish universities. If a complainant remains dissatisfied once the University’s complaints procedure has been exhausted, the complainant can ask the SPSO to look at their complaint. The SPSO cannot normally look at complaints:

- where the complainant has not gone all the way through the University’s complaints handling procedure;
- more than 12 months after the complainant became aware of the matter they want to complain about; or
- that have been or are being considered in court.
The SPSO’s contact details are:

In Person
If you would like to visit the SPSO in person, an appointment must first be arranged by calling 0800 377 7330.

SPSO
Bridgeside House
99 McDonald Road
Edinburgh
EH7 4NS

By Post
Freepost SPSO

Phone
0131 225 5300

Freephone
0800 377 7330

Website
www.spso.org.uk
Governance of the Complaints Handling Procedure

Roles and Responsibilities

All staff will be aware of:
- The CHP;
- How to handle and record complaints at the frontline resolution stage;
- Who they can refer a complaint to if they are unable to handle the matter personally;
- The need to try and resolve complaints early and as locally (within their department) as possible; and
- Their clear authority to attempt to resolve any complaints they may be called upon to deal with.

Senior management will ensure that:
- The University’s final position on a complaint investigation is signed off by an appropriate senior officer in order to provide assurance that this is the definitive response of the University and that the complainant’s concerns have been taken seriously;
- It maintains overall responsibility and accountability for the management and governance of complaints handling within the University;
- It has an active role in, and understanding of, the CHP (although not necessarily involved in the decision making process of complaints handling);
- Mechanisms are in place to ensure a consistent approach to the way complaints handling information is managed, monitored, reviewed and reported at all levels in the University;
- Complaints information is used to improve services, and this is evident from regular publications.

Principal: The Principal provides leadership and direction to the University. This includes ensuring that there is an effective complaints handling procedure with a robust investigation process which demonstrates that organisational learning is in place. The Principal delegates responsibility for the procedure to the University Secretary, supported by Student, Academic and Corporate Services. They should also ensure that complaints are used to identify service improvements, and that these improvements are implemented, and learning fed back to the wider organisation as appropriate.

Complaints Coordinator: The Complaints Coordinator is responsible for receiving complaints at the investigation stage. He/she checks complaints initially to ensure that they are within time and within jurisdiction, acknowledges them, and refers them for frontline resolution if this has not been attempted and seems appropriate. On advice where required from the Academic Registrar or Deputy Secretary, the Complaints Coordinator is responsible for the allocation of complaint investigations to appropriate staff members, bearing in mind the need to avoid any possible conflict of interest. The Complaints Coordinator is responsible for ensuring that a) Faculty Deans/Service Directors are made aware at an early stage where an investigation is to be undertaken of a complaint relating to their area of responsibility, b) individuals affected by the complaint are notified of the outcome as appropriate and c) case-specific redress action and/or process improvement for the future are drawn to the attention of the relevant area(s). The Complaints Coordinator is also the University’s nominated SPSO Liaison Officer. In conjunction with the Academic Quality and Governance Manager, the Complaints Coordinator is responsible for providing complaints information in an orderly, structured way within requested timescales, providing comments on factual accuracy on behalf of the University in response to SPSO reports, confirming recommendations have been implemented, and providing evidence to verify this.

Faculty Deans/Executive Directors: Faculty Deans/Executive Directors are the senior officers responsible for acknowledging and progressing any recommendations that are made within complaints responses that relate to their faculty/directorate.
Complaint Investigators: Complaints Investigators are staff members from faculties and professional services responsible for the conduct of the complaint investigation and are involved in the investigation and the coordination of all aspects of the response to the complainant. This may include preparing a comprehensive written report, including details of any recommended procedural changes to service delivery.

Complaints about senior staff
If we receive a complaint against senior staff we will ensure it is investigated and signed off by individuals who are independent of the situation.

Recording, reporting, publicising and learning
In order to use the valuable feedback obtained through complaints to improve provision of services across the University we need to record all complaints so that we can use the complaints data for analysis and management reporting. By recording and using complaints information in this way, the causes of complaints can be identified, addressed and, where appropriate, training opportunities can be identified and improvements introduced. The Complaints Coordinator is responsible for the maintenance of an effective complaint record system.

Recording complaints
To collect suitable data, it is essential that all complaints are recorded in sufficient detail. The minimum requirements are as follows:

- name and contact details of the complainant and student matriculation number (if applicable)
- date of receipt of the complaint
- how the complaint was received
- category of complaint
- staff member responsible for handling the complaint
- area of the University to which the complaint relates
- action taken and outcome at frontline resolution stage
- date the complaint was closed at the frontline resolution stage
- date the investigation stage was initiated (if applicable)
- action taken and outcome at investigation stage (if applicable)
- date the complaint was closed at the investigation stage (if applicable)
- underlying cause and remedial action taken (if applicable)
- response times at each stage

The University has a structured system for recording complaints, their outcomes and any resulting action so that the complaint data can be used for internal reporting as indicated below.

Reporting of complaints
The University has a system for the internal reporting of complaints information. Regularly reporting the analysis of complaints information helps to inform management of where improvements are required. Information reported internally will include:

- performance statistics, detailing complaints volumes, types and key performance information, for example on time taken and stage at which complaints were resolved
- the trends and outcomes of complaints and the actions taken in response including examples to demonstrate how complaints have helped improve services.
Publicising complaints performance information
On a quarterly basis we will review complaints outcomes, trends and actions taken to improve services, with a focus on examples of how complaints have helped improve services. This may also include positive feedback from students and members of the public. Complaint outcomes and trends will be considered within appropriate University forums and teams.

This demonstrates our approach to improving services on the basis of complaints and shows that complaints can influence our services. It also helps ensure transparency in our complaints handling service and will help to demonstrate to our students and members of the public that we value their complaints.

We will report on complaints handling performance annually in line with SPSO requirements. This includes performance statistics showing the volume and type of complaints and key performance details, for example on the time taken and the stage at which complaints were resolved.

Learning from complaints
Complaint Investigators/the Complaints Coordinator will always satisfy themselves that all parties involved understand the findings of the investigation and any decisions made. The University has procedures in place to act on issues that are identified. These procedures facilitate:

- using complaints data to consider any root causes of complaints
- taking action to reduce the chance of issues arising again
- maintaining records of recommendations made in complaints responses
- systematically reviewing complaints performance reports to consider any scope to improve performance.

The analysis of management reports detailing complaints performance will help to ensure that any trends or wider issues which may not be obvious from individual complaints are identified and addressed. Where we identify a need for improvement:

- a member of staff (or team) will be designated the ‘owner’ of the issue, with
- responsibility for ensuring that any identified action is taken
- a target date will be set for the action to be implemented, and followed up on to ensure delivery within this timescale
- where appropriate, performance in the relevant area will be monitored to ensure that the issue has been resolved.

Maintaining confidentiality and data protection
Confidentiality is an important factor in conducting complaints investigations. We will always have regard to any legislative requirements; for example, data protection legislation and also internal policies on confidentiality and the use of complainant information. Complaints will be handled with an appropriate level of confidentiality and information released only to those who need it for the purposes of investigating or responding to the complaint. However, complainants should be aware that where a complaint has been raised against a particular individual or individuals it will generally be necessary to provide those concerned with details about the nature of the complaint to allow them the opportunity to respond to the allegations. In some cases the identity of the complainant may be apparent even though the name of the complainant is not revealed. No third party will be told any more about the investigation than is strictly necessary in order to obtain the information required from them.
Where a complaint has been raised against a student or member of staff and has been upheld, the complaintant will be advised of this. However, it would not be appropriate to share specific details of actions taken in response to a complaint affecting specific students or staff members, and such details are therefore not shared with a complainant.

**Managing unacceptable behaviour**

It is recognised that people may act out of character in times of trouble or distress. The circumstances leading to a complaint may result in the complainant acting in an unacceptable way. Complainants who display unacceptable behaviour may still have a legitimate grievance, and the University will treat all complaints seriously and assess them properly, however it will not tolerate unacceptable behaviour towards its staff or other members of its community. The actions of complainants who are angry, demanding or persistent (whether in person, in writing or via social media) may result in unreasonable demands on time and resources or unacceptable behaviour towards our staff. Where this is the case, the University may decide that it is necessary to restrict the complainant’s access to the CHP or a right of appeal. Where this is the case, the complainant will be informed of this and any arrangement for reviewing such a decision to restrict access/contact. Our decision on this will normally be final, and the complainant will be advised of their right to ask the SPSO to review our handling of the complaint.

**Basic principles and expectations**

Complainants are subject to the same expectations regarding their behaviour as all others who interact with the University, its staff and students. Complainants should feel free to raise matters of concern without risk of disadvantage, but where a complainant’s behaviour over the complaint is deemed to be unacceptable, we reserve the right to invoke other procedures as necessary. In the case of applicants for admission to the University, unacceptable behaviour may result in consideration of an application being terminated, or an offer of admission being withdrawn. In the case of students, unacceptable behaviour may result in referral under the Code of Student Discipline. If such action is deemed necessary, the complainant will be advised of this and attempts will nevertheless be made to complete the investigation of the complaint, though contact with the complainant may be restricted.

**Types of unacceptable behaviour**

- **Aggressive or abusive behaviour**
  
  For example, threats, personal verbal abuse, derogatory remarks or rudeness and any written, verbal or social media content which may cause staff to feel afraid, threatened or abused. Inflammatory remarks and unsubstantiated allegations are also considered unacceptable. If physical violence is threatened or used, we will report this to the police. In cases such as this, the complainant will be advised that their behaviour is unacceptable, they will be asked to moderate their behaviour, and they will be warned that if the unacceptable action or behaviour continues, the University will cease to respond to them.

- **Unreasonable demands**
  
  Whilst staff will make every attempt to resolve complaints fully and within the published timescales, and to respond to reasonable requests from complainants, staff should not be subjected to unreasonable demands. Examples of unacceptable behaviour under this heading include:
  - repeatedly demanding responses within an unreasonable timescale;
  - insisting on speaking to a particular staff member when that is not possible;
  - insisting on dealing with different staff members;
  - repeatedly changing the substance of a complaint or raising either very similar or unrelated concerns.
• **Unreasonable levels of contact**
  Sometimes the volume and/or duration of contact made to University staff by a complainant causes problems. This can occur over a short period – for example, a number of telephone calls in a day – or over the life-span of a complaint when a complainant repeatedly calls (in person or by telephone), emails, or submits unreasonable volumes of information which has already been sent or which is not relevant to the complaint. The level of contact will be regarded as unacceptable when the amount of time spent dealing with the complainant impacts on the ability of staff to investigate the complaint, impacts adversely on ability to attend to other business, or is considered disproportionate to the issue(s) being complained about.

• **Unreasonable use of the complaint procedure**
  Individuals have the right to complain to the University more than once, if subsequent issues arise. However, this becomes unreasonable when the effect of the repeated or additional complaint(s) is to harass staff or prevent the University from pursuing its legitimate business or implement a legitimate decision.

• **Unreasonable persistence and/or refusal to accept a decision**
  Persistent refusal to accept a decision made in relation to a complaint, persistent refusal to accept explanations relating to what can or cannot be done about the complaint, and/or continuing to pursue or attempting to re-open a complaint without presenting any new evidence will be considered unreasonable. We will advise the complainant when consideration of the complaint has been completed, and of the complainant’s right of review by the SPSO, but further communication thereafter is likely to result in contact being restricted and/or further communications being ignored.

Access to the Complaint Handling Procedure is important and we will only consider its repeated use unreasonable in exceptional circumstances, but we reserve the right to refuse to consider repeated complaint(s) in those exceptional cases.

**Progressing cases where behaviour is unreasonable**
When unreasonable behaviour limits our ability to communicate with the complainant, attempts will nevertheless be made to investigate and report on the complaint, on the basis of written evidence produced up to the point at which contact has been restricted.