IP16 – Complaints Handling Process

1. Introduction

Real Group is committed to providing a high quality experience for each client and encourages clients to inform us where there is any cause for concern. Our complaints procedure exists to enable clients to make complaints about such matters. The guiding principles within this procedure are that complaints will be:

- treated seriously and with fairness,
- dealt with without undue delay, and in as straightforward a manner as possible,
- treated consistently across all programmes and departments,
- dealt with and resolved, wherever possible, in an informal way,
- progressed through stages leading, if necessary, to a formal stage.

2. Definition and Scope

2.1 A complaint is defined as an expression of dissatisfaction about matters that affect the quality of the standard of service provided by or on behalf of Real Group or a client's learning experience.

2.2 This process defines a client as:

- all delegates registered on one of Real Group's training programmes,
- all clients of Real Psychology,
- all members of The Dyslexia Guild,
- all customers of the Dyslexia Action Shop
- all Campus Online clients of Real e-Learning
- and anyone else who could reasonably be categorised as a client of Real Group.

2.3 Both clients and non-clients may raise a complaint using the process outlined in this document under the rules set out in the Data (Use and Access) Act 2025. Where this policy makes reference to clients, this also covers non-clients who are making a complaint related to data protection.

If you consider that Real Group has infringed data protection legislation because of the way we have handled your personal information (or the personal information of someone you are acting on behalf

of), you can make a complaint about this. Stage 1 Early Resolution complaints related to data protection can be addressed to Real Group's Data Manager.

2.4 Former clients may raise issues of complaint within the timescales stated below.

2.5 All complaints will be dealt with within the scope of this policy.

2.6 Each complaint will be considered on its own merits, subject to all legal and professional requirements.

2.7 A client will not be treated less favourably by Real Group or suffer any detriment or disadvantage if they make a complaint in good faith, regardless of whether the complaint is successful. We recognise that clients are often concerned about making complaints. However the Real Group leadership team will carefully consider all received complaints so that we can resolve matters and where appropriate to change and improve what we do.

2.8 These internal procedures will be operated in accordance with Real Group's Equality, Diversity and Inclusion Policy in Relation to Education Provision. Complaints will be handled with an appropriate level of confidentiality. There is an expectation that clients and staff members will treat both the complaints processes and each other with respect.

3. Timeframe for making a complaint

A current or recent client, or a group of clients wishing to complain should normally do so within eight weeks of the event which has given rise to the complaint or, if a series of events has given rise to a complaint, within eight weeks of the final event in the series.

4. Complaints Procedure Stages

4.1 **Stage 1: Early Resolution**

4.1.1 Initially, a client should seek to deal with their expression of dissatisfaction or complaint directly with the staff member involved at the level at which the event leading to the complaint occurred. A client should, if at all possible, address their complaint to the team member most directly

involved in the event leading to the complaint, in order to give that person the opportunity to address their concerns.

4.1.2 Programme leaders, department heads, or other staff directly handling an expression of dissatisfaction or informal complaint will make initial contact with the client. They will log the issue raised on the informal complaints record when they become aware of the issue. They will update the record with any actions taken and/or any lessons learnt once they have concluded the matter or it has been escalated.

4.1.3 If for any reason the client does not feel that this is possible, they should seek advice from the Real Group Advisor team who can be contacted on 01273 35 80 80 / info@realgroup.co.uk. The team will (i) log the issue raised on the informal complaints record and (ii) liaise with the appropriate team members/heads of department to enable the issue to be resolved at the time (Stage 1a) or enable further investigation of the issue, if necessary (Stage 1b). Every effort will be made by Real Group to enable the clear articulation of the issue and to resolve the issue simply and quickly.

Stage 1a. If the complaint is one that can be resolved at the time, or if steps can be agreed to start the resolution of the complaint, the process will often end then, or as soon as the agreed steps have been taken. The staff member managing the complaint within Real Group will communicate this in writing or verbally to the client.

Stage 1b. If the complaint cannot be resolved quickly or requires further investigation, further steps will be necessary and the issue will be progressed to stage 1b. Stage 1b complaints will be dealt with in a timely fashion. Those involved in investigating the complaint will establish appropriate timescales based on its nature and complexity. Real Group will communicate these timescales to the client and keep them informed of any changes. Where possible, the investigation should be completed within 28 days. At the end of Stage 1b, a client will be provided with a written response by the staff member managing the complaint within Real Group, setting out the outcome of their complaint (and copied to the Director of Pedagogy and Learning) which will either:

- detail the proposed resolution; OR
- if no resolution has been proposed, explain why resolution has not been considered to be possible. When it is clear early resolution is not appropriate or possible, and that a

concern will need to proceed immediately to the formal stage, the client will be directed promptly to the formal complaint processes.

4.2 **Stage 2: Formal Complaint**

4.2.1 The formal complaints process is triggered when:

- the client declines to engage with early resolution and initiates the formal process in line with Real Group's procedures
- early resolution was attempted, but the client remains dissatisfied and initiates the formal process in line with Real Group's procedures
- the issues raised are complex and will require detailed investigation, for example; where a complaint relates to the conduct of staff members or covers a number of different incidents

4.2.2. The client will be directed to the form "Report a formal complaint" in order to provide full details of the complaint and to submit any relevant documentation. The client is requested to complete the form within one week. Real Group cannot progress the complaint without the "Report a formal complaint" form being submitted. If a client requires support to complete the form they can request this and support will be provided.

4.2.3 On receipt of the formal complaint form, Real Group will undertake an initial evaluation to check that the complaint is submitted under the right procedures, within any deadline, and in the required format. This evaluation will normally be undertaken by the Academic Quality and Compliance Manager, who will have oversight of the complaint handling process and will be responsible for recording the complaint and any subsequent actions on the nonconformity and complaint log (IF-15).

4.2.4 If the complaint is accepted for consideration, Real Group will allocate it to a senior member of staff, who will ideally have had no previous involvement in the matter. Every effort will be made to find a staff member who is sufficiently removed from any earlier process. It may be appropriate to ask a manager from another department to investigate.

4.2.5 The appointed member of staff will offer an appointment to speak with the client who has raised the complaint, within two weeks of the form being submitted. This would normally be done via phone, due to the restrictions of distance learning but a video conference or face-to-face meeting may be possible. The conversation will be to establish clarity regarding exactly what is being investigated.

4.2.6 The member of staff investigating the complaint may talk to key staff or other clients and consider documents and other evidence. The staff member will produce a report within four weeks of the form being submitted, based on their investigations, and which outlines the process followed, the information gathered, and the conclusions drawn. Once completed, this report will be shared with the Academic Quality and Compliance Manager, the appropriate head of department, and the director with oversight of the area of the company concerned.

4.3 **Exceptional panel meeting**

4.3.1 In exceptional circumstances it may be decided by Real Group to hold a panel meeting to provide an opportunity for mediation and resolution. A panel meeting would be expected to be held within seven weeks of the form being submitted.

4.3.2 If a panel is to be convened, Real Group will write to the client, at least three weeks in advance, inviting them to a panel meeting making it clear whether the focus is to make a decision or provide mediation and setting out:

- the circumstances in which a panel has been convened
- the process to be followed
- the date of the meeting and an explanation of what the client needs to do if they cannot attend on that date, or does not wish to do so
- the names of the panel members and their job titles
- the names of anyone else attending the meeting and what their role will be
- details of if the client may be represented, or may bring a friend to support them
- an outline of how the meeting will proceed
- copies of any relevant documents

4.3.4 Real Group will take all necessary steps to ensure that the proceedings are conducted in a timely manner with adequate notice given to the client. If the client is able to join via video link, Real Group will discuss with the client the best software to use for the individual and organise a solution that meets their needs.

4.3.5 Real Group will carefully consider the constitution of the panel to ensure that those charged with reaching a decision or providing mediation have had no previous involvement in the matter, and are properly trained, resourced and supported.

4.4 **Closing the complaint at the formal stage**

4.4.1 Once the formal stage has been completed, The Academic Quality and Compliance Manager will write to the client to set out the outcome, including any decision to reject the complaint at initial

evaluation, giving a clear explanation of and outlining the reasons for each decision in straightforward language and attaching the investigation report. This will help the client decide whether or not to pursue the matter further. The Academic Quality and Compliance Manager will then update the nonconformity and complaint log (IF15) with the outcome once the complaint has been closed.

4.4.2 The letter will also give information about:

- the client's right to take the complaint to the review stage
- the grounds on which they can do so
- the time limit for escalating to the review stage and the appropriate procedure for doing so
- where and how to access support
- a copy of the investigation report will also be attached to the letter

4.4.3 If the complaint is rejected, for example because it has been submitted late, Real Group will issue a Completion of Procedures letter. The letter will outline the reason(s) why the complaint has been rejected.

4.4.4 If the client does not take the complaint to the review stage within the time limit for doing so, Real Group will close the matter. A Completion of Procedures letter will be issued if requested in writing by the client within four weeks of the date on the letter giving the outcome. The letter will explain that the client has not completed the internal processes.

4.4.5 Where a complaint is upheld, or partially upheld, Real Group will explain how and when it will implement any remedy, whether that includes an apology, and what the client can do if they remain dissatisfied. A Completion of Procedures letter will be issued if requested in writing by the client within four weeks of the date on the letter, giving the outcome.

4.5 **Stage 3: Review of a formal complaint**

4.5.1 If a client is dissatisfied with the outcome of the formal stage, they can request a review. A request for a review must be made on one of the following grounds:

- the procedures were incorrectly followed at the formal stage
- in the client's view, the outcome was clearly unreasonable
- new material evidence is available, which for valid reasons, the client was unable to provide earlier in the process

4.5.2 Depending on the nature of the request for a review, the issue may be considered afresh and/or include an additional investigation. A complaint must have been considered at the formal stage before it can be escalated to the review stage.

4.5.3 A client must submit a request for review in writing within four weeks of the date of the letter giving the outcome of the formal stage. Once a request for a review has been received the Academic Quality and Compliance Manager will update the nonconformity and complaint log (IF15).

4.5.4 On receiving a request for review, Real Group will allocate the request for review to a designated member of staff not involved at any previous stage. It will be made clear from the start of the review stage exactly what is being reviewed, and Real Group will ensure that both the reviewer and the client understand the purpose and scope of the review. If the client's expectations appear to exceed the scope of the review stage, the designated member of staff will explain this to the client as soon as possible in writing in order to manage expectations about possible outcomes.

4.5.5 The designated member of staff is able to overturn the outcome of the formal stage where it is clear that an incorrect decision has been made.

4.5.6 The designated member of staff will consider:

- Were the relevant procedures followed during the formal stage?
- Was the outcome reasonable in the circumstances?
- Has the client received clear reasons why the complaint was rejected at the formal stage?
- If new material evidence has been provided, has the client given valid reasons for not supplying this earlier?

4.6 **Closing the complaint at the review stage**

4.6.1 If the complaint is not upheld, the outcome of the review stage will be communicated to the client in writing by the Academic Quality and Compliance Manager issuing a Completion of Procedures letter as soon as possible and within four weeks of the request for review being submitted. This will include a clear explanation and outline the reasons for the decision. This will help the client decide whether or not to pursue the matter further.

4.6.2 Where a complaint is upheld, the Academic Quality and Compliance Manager will communicate this to the client in writing, explaining how and when it will implement any remedy, and

whether that includes an apology. A Completion of Procedures letter will be issued if requested in writing by the client within four weeks of the date on the letter giving the outcome.

4.6.3 The Academic Quality and Compliance Manager will then update the nonconformity and complaint log (IF15) with the outcome once the review has been closed.

4.7 **Completion of Procedures letters**

4.7.1 In addition to giving an overview of the compliant and the outcome reached, a Completion of Procedures letter will also advise the client about:

- Where and how to access advice and support
- If the client is/was studying on a course validated by Middlesex University London - their rights in relation to the University's regulations and procedures
- If the client is/was studying on a course accredited by the British Psychological Society (BPS) - their rights in relation to the Society's regulations and procedures
- If the client is/was studying on a higher education course (any courses listed as at levels 4, 5, 6 or 7) - their rights in relation to the Office of the Independent Adjudicator for Higher Education (OIAHE)
- If the client is/was using the services provided by Real Psychology - their rights in relation to the Health and Care Professions Council (HCPC).
- If the complaint is related to data protection - their rights in relation to the Information Commissioner's Office (ICO).

4.7.2 Middlesex University London validated courses and programmes

Once the Real Group procedures have been exhausted, clients who are/were studying on a course or programme validated by Middlesex University, London, have rights for further escalation of their complaint under the University's regulations. Requests for a university-level review must be submitted through the appropriate process within 20 working days of the date of the Completion of Procedures letter. Middlesex University's complaints and grievance procedures are on their website and accessible at the following link https://www.mdx.ac.uk/about-us/policies/complaints/, accessed September 2026.

4.7.3 British Psychological Society (BPS) accredited courses and programmes

Once the Real Group procedures have been exhausted, clients who are/were studying on a course accredited by the British Psychological Society (BPS) have rights for further escalation of their

complaint under the Society's regulations. Complaints must be submitted through the appropriate process within six months of the date of the Completion of Procedures letter. The British Psychological Society's complaints procedures are on their website and accessible at the following link https://www.bps.org.uk/accreditation, accessed September 2026.

4.7.4 The Office of the Independent Adjudicator for Higher Education (OIAHE)

Once all the stages are completed for a complaint relating to a higher education course or programme (those at Level 4 or above) a client may be entitled to ask the Office of the Independent Adjudicator for Higher Education (OIAHE), the independent ombudsman service, to review their complaint. The complaint should be submitted to the OIAHE within 12 months of the date of the Completion of Procedures letter. The Independent Adjudicator's complaints procedures are on their website and accessible at the following link https://www.oiahe.org.uk/students/can-you-complain-to-us/, accessed September 2026.

4.7.5 Health & Care Professions Council (HCPC)

Clients of Real Psychology have the right to raise a concern about an HCPC-registered educational psychologist working for Real Group to the Health & Care Professions Council. The concerns process is outlined on their website and accessible at the following link https://www.hcpc-uk.org/concerns/, accessed September 2026.

4.7.6 SpLD Professional Membership Bodies

Clients of Real Group may have the right to raise a concern about a member of one of the three SpLD professional membership bodies who is working for Real Group in a capacity directly linked to their membership; such as someone with an Assessment Practicing Certificate (APC) issued by one of the membership bodies, who is delivering SpLD assessment training.

- British Dyslexia Association https://www.bdadyslexia.org.uk/
- The Dyslexia Guild https://dyslexiaguild.org.uk/
- The Professional Association of Teachers of Students with Specific Learning Difficulties https://www.patoss-dyslexia.org/

4.7.7 NQual

Clients who are/were studying on either an NQual Ofqual-regulated or endorsed qualification have rights for further escalation of a complaint under the NQual's complaints policy. The complaint should be submitted to NQual within 2 months of the event occurring or the completion of Real

Group's complaints process. Nqual's complaints policy can be found on their website: https://www.nqual.co.uk/policies, accessed September 2026.

4.7.8 Information Commissioner's Office (ICO)

Once all the stages are completed for a complaint relating to data protection you may be entitled to ask the Information Commissioner's Office (ICO) to review their complaint. The process for doing this is outlined on their website and accessible at the following link https://ico.org.uk/make-a-complaint/data-protection-complaints/, accessed September 2026.

5. Reference Documents

- IP46 – Data Protection Policy
- IF14 – Customer Complaint Registration Form
- IF15 – Nonconformity and Complaint Log
- RG41 – Equality, Diversity and Inclusion Policy in Relation to Education Provision

6. Document History

Issue 5

Renamed from Customer Complaints Handling Process to Complaints Handling Process

Added section 2.3 and renumbered sections 2.4-2.8

Added reference to the ICO to section 4.7.1

Updated links in sections 4.7.2-4.7.5

Added sections 4.7.6, 4.7.7 and 4.7.8

Updated list of reference documents

Added document history section