

## Complaints Policy

<b>Document Owner:</b> Head of Quality and Funding & Quality Director		
<b>Version No.</b>	<b>Date</b>	<b>Notes</b>
1	Jan 2018	Introduction and implementation of policy and process
2	Feb 2019	Annual review
3	Mar 2020	Annual review
4	Mar 2021	Updates: Communication process, new systems, staff updates
5	Jun 2021	Added Senior Manager sign off
6	Apr 2022	Update to personnel and ownership
7	Mar 2023	Update to personnel and ownership
8	Dec 2023	Links to external AO/EPA complaints policies, update to process relating to FS qualification regulators, update to escalation bodies (DfE) and other provision
9	Feb 2024	Update to branding
10	Nov 2024	Annual review Reformatted HE procedures included within the policy
11	Mar 2025	Document owner title updated
11.1	May 2025	Removal of ESFA and included reference to DfE (address still references ESFA as per their revised process) Removal of Skills Bootcamps escalation due to completed contract
11.2	October 2025	Update to DfE details
11.3	November 2025	Update to AOs
11.4	January 2026	Update to include CMI

12	May 2026	Update to reference HE requirements
12.1	June 2026	Update to include Data Protection and GDPR Complaints Procedure

## 1. Purpose and Scope

1.1 We are committed to provide a high-quality service for our learners, clients and the community we serve and seek to continually improve the quality of experience and strive to meet stakeholder expectations.

1.2 Cambridge Spark actively encourages learners to evaluate their Programme and overall experience by providing feedback through module evaluations and internal and external surveys. Any learner who is dissatisfied with their experience can express their concern or raise a complaint.

1.3 All complaints made under this policy and procedure will be treated seriously and dealt with in a fair, objective, open and transparent manner.

1.4 There is an expectation from Awarding Organisations and partner universities that complaints are dealt with by Cambridge Spark in the first instance. If the complaint is unresolved at that stage, it can be pursued through the appropriate Awarding Organisation (AO), Department of Education (DfE) or the Office of the Independent Adjudicator for Higher Education (OIA) for specific provision funded as Higher Education, provided that the complaint is eligible under its rules. The OIA has been established to provide an independent scheme for the review of student complaints and can be contacted at [www.oiahe.org.uk](http://www.oiahe.org.uk). A complaint will not be considered by the OIA unless it is received within 12 months from the date of issue of the completion of procedure letter.

1.5 For students enrolled on Higher Education programmes [including university-validated awards, higher technical qualifications and higher apprenticeships at Level 4 and above], this policy is aligned to the Office of the Independent Adjudicator [OIA] Good Practice Framework for handling complaints and academic appeals. Where there is any inconsistency between this policy and the requirements of a validation partner [not yet confirmed], the validating partner's regulations shall take precedence.

1.6 Complaints will be dealt with promptly and constructively. All complaints will be dealt with in confidence but shared with any person who may be the subject of a complaint. The outcomes of any complaint will be shared with the complainant and any staff involved. Complaints made which, upon investigation, turn out to be malicious, may result in disciplinary action.

## 2. Definition of terms

For the purpose of this policy, Cambridge Spark defines a complaint as an expression of dissatisfaction by one or more individuals about the standard of a service, action or lack of action by or on behalf of Cambridge Spark. The Complaints Procedure does not apply to matters of academic judgement. Academic judgement includes decisions about marks, grades, progression, assessment outcomes and academic standards that have been reached following due academic process. Such matters are considered under the Academic Appeals Policy.

## **2.1 Scope of Complaints Procedure**

The Procedure deals with complaints arising from:

- Delivery (or lack of delivery) of services for education and training, including teaching, course content, tutoring, assessment, feedback on progress and learner support during learning programmes.
- Incorrect or misleading information about services provided by Cambridge Spark.
- Delivery (or lack of delivery) of support services provided by Cambridge Spark including administration of fees, enrolment processes, health and safety and learner resources and Services.
- Unacceptable actions or behaviour by Cambridge Spark staff and/or other learners.

## **2.2 Separate procedures exist for:**

- Code of Conduct
- Malpractice and maladministration
- Appeals policy
- Whistleblowing policy
- Data Protection and GDPR Complaints Procedure

## **3. Key responsibilities**

The Head of Quality is responsible for:

- Logging complaints and monitoring response times.
- Recording and reporting on the outcomes of informal and formal complaints.
- Ensuring that central records relating to formal complaints are securely stored for a maximum period of six years.
- Ensuring all complainants are aware of their rights in relation to accessing personal data related to the complaint.
- Carrying out a full and balanced investigation into the complaint/review.
- Complying with the timescale for completion.
- Providing a written response to the complainant.

Governance Oversight - A summary report of complaints (including themes, outcomes, timescales and equality analysis) will be presented annually to the Academic Governance body and Governing Body (or equivalent). Systemic issues identified through complaints will inform quality enhancement planning and risk management processes

## **4. General Principles**

Complaints should normally be raised as soon as possible and within three months of the matter arising. However, Cambridge Spark retains discretion to consider complaints submitted outside this timeframe where there is good reason for the delay, including (but not limited to) illness, disability, or other exceptional circumstances

Cambridge Spark expects that the majority of complaints can be resolved at an early stage (stage 1 early resolution at the local level), without the need to start formal procedures. Every effort will be made to resolve the issue locally through informal discussion and agreed actions. Where early

resolution is not possible or does not result in a satisfactory resolution, a written formal complaint (stage 2 formal complaint) may be submitted.

Cambridge Spark expects to be able to collect appropriate information from all parties involved to ensure that a thorough investigation of a complaint can be made. Anonymous complaints will be considered where there is sufficient information to enable investigation and particularly where the complaint raises serious concerns relating to safeguarding, discrimination, harassment, academic integrity or systemic risk.

Response deadlines may be extended outside of term-time due to the availability of the Head of Quality or if the investigation requires additional time to gain further evidence. In this case, the complainant will be notified.

Learners will not be disadvantaged as a result of raising a matter of concern or of making a complaint.

Cambridge Spark has the right to terminate its consideration of a complaint if it is believed to be frivolous or vexatious. Frivolous or vexatious is characterised by:

- Complaints which are obsessive, persistent, harassing, and repetitious.
- Insistence in pursuing unmeritorious complaints and/or unrealistic outcomes.
- Complaints which are designed to cause disruption or annoyance.
- Demands for redress which lack any serious purpose or value.

A decision to categorise a complaint as vexatious or frivolous must be approved by a Director not previously involved in the matter and will be communicated in writing with reasons. The complainant may request a review of this decision.

Accessibility and Reasonable Adjustments - Cambridge Spark is committed to ensuring that this procedure is accessible to all students. Reasonable adjustments will be made for disabled students and alternative formats of documentation will be provided on request. Support and guidance will be made available to ensure students are not disadvantaged in raising a complaint

## **5. Data protection**

It is expected that all learners will assume responsibility for communication with Cambridge Spark and for drawing attention to any problems or concerns.

Where a complaint is received from a third party on behalf of a learner, Cambridge Spark will accept the complaint and therefore communicate with the parent/guardian or relevant third party only with the express written consent of the learner and only on receipt of such consent. Exceptions will only be made in the vital interests of the individual, such as where there is a serious concern which may impact on the safeguarding or welfare of the individual.

All information received as a result of a complaint investigation will remain confidential to those involved in the process. No third party will be given more details of the investigation than is strictly necessary in order to obtain the information required from them. Cambridge Spark will ensure that it acts in accordance with legislative requirements, for example, data protection legislation, and with internal policies on confidentiality and the use of student data and complainant information.

Personal data processed as part of a complaint investigation will be handled in accordance with UK GDPR and the Data Protection Act 2018. Information will be retained only for as long as necessary and in line with Cambridge Spark's data retention schedule.

## **6. Stages of the complaints procedure**

A complaint cannot normally be taken to the next level until the previous level has been completed. The stages of the complaints procedure should be followed in the order as detailed below.

Students may seek independent advice from both our independent support advisors, those at the validating partner university or another independent adviser during the complaints process

Complaints must be made in writing to the Complaints team: [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com). Support can be made available for all those involved in a complaint throughout the process, including:

- Representation: from a parent, guardian, friend or supporter
- Independent advice: independent support team at Cambridge Spark or the validating partner university
- Documentation: assistance with completing the written complaint

Your learner Induction will also provide further details regarding this process.

### **6.1 Stage 1: Informal resolution of complaints**

Cambridge Spark expects that the majority of complaints can be resolved at an early stage through informal discussion without needing to instigate formal procedures.

If an issue arises, the learner/stakeholder should bring the matter to the attention of the relevant staff (likely to be your coach/mentor/trainer or their Delivery Manager). The initial complaint may be made orally or in writing, and the member of staff receiving the complaint should make a response within 10 working days, orally or in writing. It is expected that staff are tactful and courteous in dealing with a complaint. If the complainant is dissatisfied with the response received, they should then be guided to use the formal procedure, outlined below.

To provide a record of discussions and outcomes in case the matter is not resolved and needs to be taken to the next level, all informal complaints will be noted on the early resolution email (see Appendix 2), confirming actions and /or investigation taken to resolve. Both the learner and the staff member should be included in the email and sent to: [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com)

Participation in Stage 1 (informal resolution) is encouraged but is not mandatory where the student considers the matter serious, sensitive, or unsuitable for informal resolution.

## **6.2 Stage 2 Formal Procedure**

### **Step 1- submit a formal complaint**

If the learner/stakeholder is not satisfied with the outcome of the stage 1 resolution, the complaint may be progressed further. Where a learner wishes to pursue a formal complaint, the complaint email should be completed (see appendix 3)

The formal complaint should be made within 15 days of the date of the early resolution response. In exceptional circumstances, a longer period will be considered. The complaint should be submitted in writing and sent to: [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com). It is important to include an outline of the nature of the complaint, what has been done to try to resolve the situation and the desired outcome. The complaint will be allocated out to the relevant manager or 'Head of' aligned with the particular complaint.

Should the complaint be about that particular individual, then it will be handled by another relevant member of management. The complaint will be logged, and its receipt will be acknowledged inside 24hrs, with an initial response to the complainant within 5 working days.

The Head of Quality will carry out an initial assessment of the complaint within 10 working days. In most cases, complaints will be referred to the appropriate staff for investigation and report. More serious or unusual complaints will be investigated by the Head of Quality directly.

An appropriate senior manager/director will carry out an investigation of the complaint and may interview the complainant, the respondent, witnesses to the matter or events, and anyone they believe may have a role in establishing or disproving the complaint, as necessary. They will prepare a summary and report back to the Quality Team within 20 working days of acknowledgement.

The Quality Team will record the outcome of the complaint and either arrange a meeting to deliver the outcome or notify all those involved in writing as appropriate. All outcomes will be confirmed in writing to all those involved.

If the complaint involves a learner, they will be offered support at the meeting. All learners will be encouraged to bring a supporter to the interview. Vulnerable Adults and those under 16 years of age must have the support of their caretaker, or a person of their choice, who can act as their advocate and the Quality Team must be informed.

The formal complaint will include, if not a full resolution, a detailed action plan including timeframes for resolution of the receipt of the original formal complaint. If it appears that a decision will not be reached within the due period, those involved will be advised of the need for a longer period.

If a learner is not satisfied with the outcome of the formal complaint stage, they have 20 working days to request a review from the date of the formal complaint response letter.

### **Step 2 - Request a complaint review**

The purpose of the review is to consider if the correct procedure was followed during the formal complaint stage and if the outcome was reasonable. In the case of new evidence, it will only be considered if it materially affects the outcome of the formal complaint. At the review stage, we would

not usually reconsider the issues or investigate further. The formal complaint stage must be completed before a review can take place.

If the expectations are beyond what can be considered at the review stage, the quality team will inform the complainant in writing.

There are limited grounds for asking for the review; these are:

- There is new evidence for consideration which materially affects the outcome of the formal complaint.
- Not all of the evidence was considered when coming to a conclusion.
- Other procedural irregularity in step 1 of the formal complaint investigation process.

Where a learner wishes to pursue the complaint, the complaint review email should be completed (see Appendix 4). The complaint should be submitted in writing and sent to:

[complaints@cambridgespark.com](mailto:complaints@cambridgespark.com)

If the outcome is to reconsider the case, a review officer will be appointed to review the case. This would normally be a member of the management team, who will be of equal or higher seniority than the initial Investigating Officer from step 1. The Review Officer will have had no prior involvement in the complaint and will be independent of the service area to which the complaint relates. The complaint review will take up to a maximum of 20 working days from the date of the complaint review request.

Students on university-validated courses will be provided with a complaint review response letter at the conclusion of stage 2, step 2 of these procedures.

At the conclusion of the internal complaints procedure, a Completion of Procedures Letter will be issued. This letter confirms that Cambridge Spark's internal procedures have been exhausted and will provide information about the student's right to refer the matter to the Office of the Independent Adjudicator (OIA) within 12 months of the date of the letter.

### **6.4 Step 3 – Referral to Validating Higher Education Institution or Awarding Organisation**

If the student remains dissatisfied, the complaint may be referred to the partner validating Higher Education Institution/Awarding Organisation for consideration, as appropriate, under its own complaints policy. On request, the Cambridge Spark will provide to the validating university all necessary evidence and details relating to the complaint. At the completion of their investigation, the validating university will issue a completion of procedures letter to the learner and also to Cambridge Spark detailing its decision and any further recourse the learner may have if still not satisfied with the outcome of the complaint.

### **6.5 Escalation of Complaint - Awarding Organisations**

#### **Functional Skills**

Highfield Qualifications [complaints policy](#), or please contact the team on 01302 363277

Should you still be unhappy with the outcome from your AO, then your complaint can be raised to the qualification regulator OFQUAL. A representative from either Cambridge Spark or Highfields will be able to provide you with contact details and any further details which may be required.

## End-Point Assessment

BCS [complaints policy](#), or please contact the team on 01793 417 417

Accelerate People [complaints policy](#)

AIM Assessment [complaints policy](#)

Academy 4 PM [complaints policy](#)

Pearson EPA [complaints policy](#)

The decision made will be final but this does not affect an individual's legal rights.

## 6.6 Escalation of Complaint - Apprenticeships

Where the response to an Apprenticeship complaint is not deemed to be satisfactory, and the complainant has exhausted any appeal opportunities, a complaint may be escalated to the Department for Education(DfE)

1. You will need to register on the [Customer Help Portal](#)
2. You will need to log your complaint, confirming having read the full complaints [procedure](#) and [ensuring that DfE can handle your complaint](#)

Additionally, the DfE can be contacted via the following methods:

Phone: 08000 150 600

E-mail: [helpdesk@manage-apprenticeships.service.gov.uk](mailto:helpdesk@manage-apprenticeships.service.gov.uk)

Post: Complaints Team, Education & Skills Funding Agency, Cheylesmore House, Quinton Road, Coventry, CV1 2WT

If you are unhappy with how the DfE has handled your complaint, then you can raise a complaint again through the [Customer Help Portal](#)

## 6.8 Escalation of Complaint - Referral to The Office of The Independent Adjudicator For Higher Education

### (a) Courses awarded by a validating Higher Education Institute:

If, following receipt of a Completion of Procedures Letter, the student remains dissatisfied, they may refer the complaint to the Office of the Independent Adjudicator for Higher Education (OIA), provided that the complaint falls within the OIA's remit. The complaint must be submitted to the OIA within 12 months of the date of the Completion of Procedures Letter. The OIA operates independently of Cambridge Spark and provides an impartial review of complaints. Further information is available at [www.oiahe.org.uk](http://www.oiahe.org.uk).

### (b) Courses such as Higher Technicals or higher apprenticeships through an Awarding Organisation:

In the case of students on higher technical qualification or higher apprenticeship courses, the student may refer the complaint directly to the Office of the Independent Adjudicator (OIA), providing that the complaint falls within its remit. On request, Cambridge Spark will provide to the OIA all necessary evidence and details relating to the complaint. If the complaint does not fall within its remit, the OIA

will notify the learner, forward a copy of the complaint to the awarding organisation and take no further action in respect of the complaint.

### **Review of the Complaints Policy and Practice**

Learning and Enhancement - Cambridge Spark is committed to learning from complaints. Trends and themes will be analysed to identify recurring issues, inform curriculum enhancement, improve student support services and strengthen operational processes. Where appropriate, actions arising from complaints will be monitored through quality assurance and governance structures.

Once a year, the Cambridge Spark Senior Management Team will review the Complaints Policy and Practice to include:

- Number of complaints of each type
- Time taken to process complaints
- List of outstanding complaints
- Outcomes of complaints
- Results of appeals
- Analysis of complaints and outcomes by age, gender and ethnicity of the complainant.

The annual review will also consider compliance with the Office for Students conditions of registration, consumer protection law guidance, and the OIA Good Practice Framework. If changes are required, the Complaints Policy will be rewritten, and all staff and learners will be informed. A record of all complaints for 6 years will be available to the relevant authorities for audit purposes.

### **Senior Manager Sign-off**

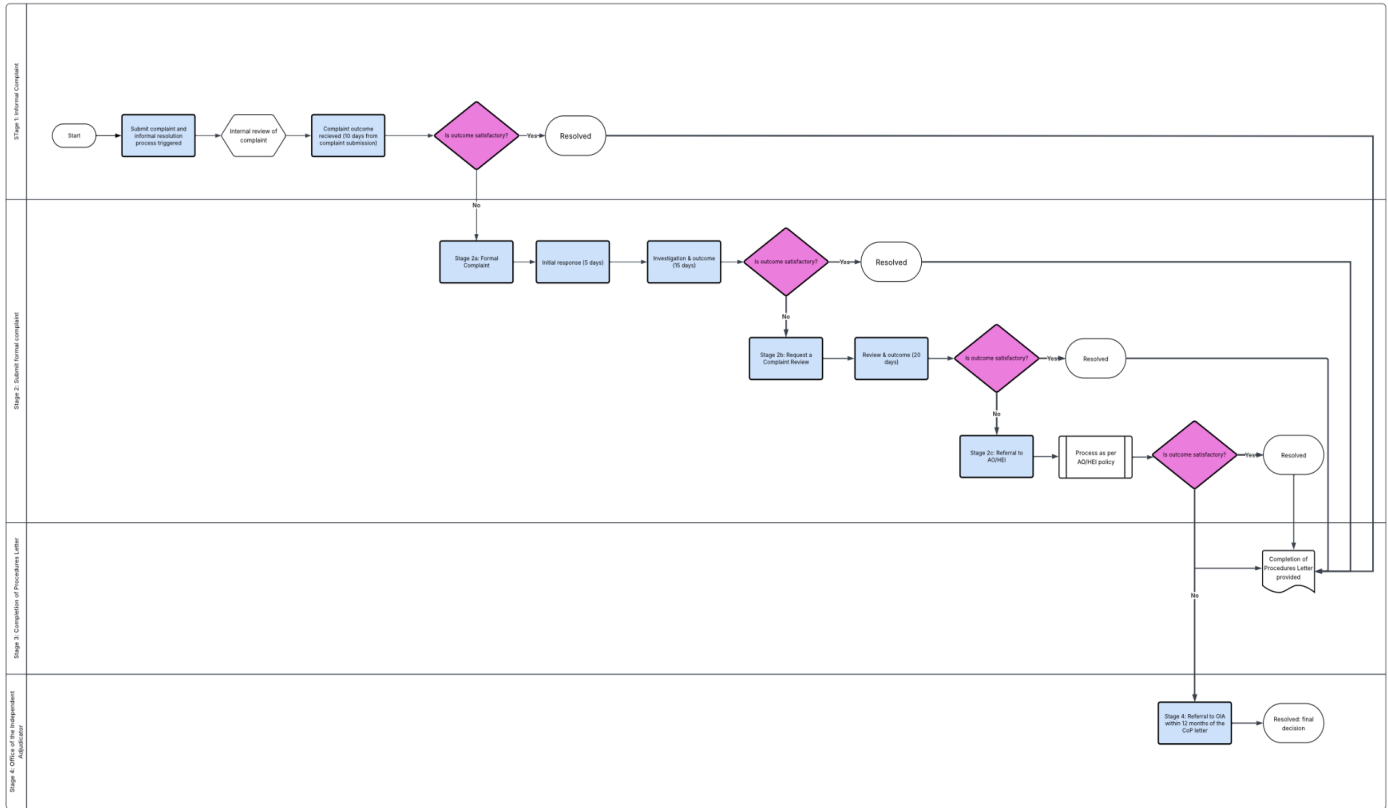
Name: Tom Phillips

Title: COO

Sign:   
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Date: 23 June 2026

## Appendix 1 - Process Flow



## Appendix 2 - Stage 1 Informal Resolution Template

### Appendix 2

Information to submit in email to [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com).

#### Stage 1 – Early Resolution at local level

1. **Learner Name:**
  2. **Learner ID:**
  3. **Programme:**
  4. **Date complaint raised:**
  5. **Staff name:**
  6. **Outline of issue:**
  7. **Resolution discussed:** If further investigation required, note date to be completed by and make arrangements to meet again to resolve within 10 day deadline
- 
- **Resolution agreed:**
    - Yes
    - No
  
  - **Staff member included in the email**
  - **Stakeholder included in the email**
  - **Next stage of the HE Complaint Procedure has been confirmed to the student**

## Appendix 3 - Stage 2 Formal Complaint Template

Information to submit in email to [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com).

### Stage 2, Step 1– Formal Complaint

#### Part A

1. Learner Name:
2. Learner ID:
3. Contact telephone number:
4. Email address:
5. Programme:

#### Part B

You can only submit your complaint using this form if you have completed the Early Resolution stage

6. What was the outcome of the early resolution stage of your concern, and why are you not satisfied with it?
7. When did the early resolution stage end?
8. Who did you contact about your concern?
9. What did they do?
10. If you did not attempt early resolution, why not?
  - I did attempt early resolution
  - I did not attempt early resolution because:
11. For each issue you are complaining about, please indicate the service area, date and type of issue:
12. Are you making this complaint within 15 working days of raising the initial concern?
  - I am making this complaint within one calendar month of raising the initial concern
  - I am not making this complaint within one calendar month of raising the initial concern.

#### Reason:

13. Your complaint – what happened? When did it happen? Who was involved? How were you affected?
14. What evidence are you providing? Please label your evidence and describe what it is below. For example, Evidence A is an email sent to me from the college on (insert date). We will only consider your evidence if you have labelled it and described how it supports your complaint. Please submit as attachments in the email submitted.
15. What outcome or further action are you hoping for? We will only consider outcomes which are reasonable, and which are allowed by Cambridge Spark policies.

**16. Would you consider mediation to attempt resolution of your complaint?**

- I would consider mediation to resolve my complaint
- I would not consider mediation to resolve my complaint because:

**Your Declaration**

**By submitting this email you confirm the following:**

- I have read and understood the Complaints Policy and Procedure
- I understand that the Cambridge Spark will accept a complaint from learners, members of the public or third parties (if they are acting as the complainant's representative and the complainant has provided permission in writing to act under the requirements of the General Data Protection Regulations)
- I understand that the Cambridge Spark will assess my request to decide whether it meets the conditions to be considered under the Complaints Policy and Procedure
- I can confirm that the information given on this form and the supporting evidence is true and accurate
- I understand that the Cambridge Spark may need to share information with other persons or organisations as part of any investigation to resolve my complaint
- I understand that if my complaint is believed to be frivolous or vexatious Cambridge Spark has the right to terminate its consideration of this complaint and write to me to explain the reasons
- By submitting this form I authorise the Cambridge Spark to investigate my complaint.

## Appendix 4 - Stage 2 Complaint Review Template

Information to submit in email to [complaints@cambridgespark.com](mailto:complaints@cambridgespark.com).

### Stage 2, Step 2– Complaint Review

#### Part A

1. **Learner Name:**
2. **Learner ID:**
3. **Contact telephone number:**
4. **Email address:**
5. **Programme:**

#### Part B

6. **Reason for requesting a review** . If you are not satisfied with the outcome of the formal complaint stage, you may be able to request a review of the formal complaint stage within one calendar month of receiving the outcome, if you can demonstrate one or more of the following grounds.
  - I have new evidence which I was unable, for valid reasons, to provide earlier in the process that would have had a significant effect on the outcome of the formal complaint stage
  - Not all of the evidence was considered when coming to a conclusion
  - Other procedural irregularity in Step 1 of the formal complaint investigation process
7. **Is your request for a review being made within one calendar month of the outcome of the formal complaint stage?**
  - I am requesting a review within one calendar month of the outcome of the formal complaint at Stage 2 Step 1 of the Complaints Procedure
  - I am not requesting a review within one calendar month of the outcome of the formal complaint at Stage 2 Step 1 of the Complaints Procedure because
8. **Using your chosen grounds for requesting a review, please say why you are not satisfied with the outcome of the formal complaint stage** Please do not repeat the information in your formal complaint form: you must indicate why you feel you have grounds to request a review (delete the grounds that are not relevant)
  - I have new evidence which I was unable, for valid reasons, to provide earlier in the process that would have had a significant effect on the outcome of the formal complaint stage
  - The new evidence could not have been provided earlier in the process because
  - The new evidence I have provided with this request would have significantly affected the outcome of the formal complaint in the following way(s)
  - Not all of the evidence was considered when coming to a conclusion
  - The following evidence was not considered
  - This has had the following significant effect on the outcome of the formal complaint
  - Other procedural irregularity in Step 1 of the formal complaint investigation process
  - The correct procedure was not followed in Step 1 in the following ways
  - This has had the following significant effect on the outcome of the formal complaint

**Part C**

- 9. What evidence are you providing?** Please label your evidence and describe what it is below. For example, Evidence A is an email sent to me from Cambridge Spark (insert date). We will only consider your evidence if you have labelled it, and describe how it supports your request for a review. Please submit as attachments in the email submitted.

**Your Declaration****By submitting this email you confirm the following:**

- I have read and understood the Complaints Policy and Procedure
- I understand that Cambridge Spark will accept a complaint from learners, members of the public or third parties (if they are acting as the complainant's representative and the complainant has provided permission in writing to act under the requirements of the General Data Protection Regulations)
- I understand that Cambridge Spark will assess my request to decide whether it meets the conditions to be considered under the Complaints Policy and Procedure
- I can confirm that the information given on this form and the supporting evidence is true and accurate
- I understand that Cambridge Spark may need to share information with other persons or organisations as part of any investigation to resolve my complaint
- I understand that if my complaint is believed to be frivolous or vexatious Cambridge Spark has the right to terminate its consideration of this complaint and write to me to explain the reasons
- By submitting this form I authorise Cambridge Spark to investigate my complaint.