

# External Complaints Policy



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## VERSION CONTROL

Version number	Summary of change	Date changed
V1	Policy creation	December 2024
V2	New policy template, review and update to process	June 2025

## INTRODUCTION

Certify Training Qualifications (CTQ) is committed to delivering qualifications and services to the highest standards. We recognise, however, that there may be occasions when learners, centres, or other stakeholders are dissatisfied. This policy outlines how to raise a formal complaint, how CTQ will handle it, and the steps we will take to resolve the issue, learn from it, and make improvements where needed.

## SCOPE

This policy applies to complaints raised by:

- Learners
- Approved Centres
- Employers or training providers
- Other third parties involved with CTQ qualifications

It covers concerns about:

- The quality or content of qualifications
- Assessment arrangements
- Our customer service or support
- The actions or behaviour of CTQ staff or representatives
- Alleged discrimination or disadvantage

This policy does not cover:

- Appeals against assessment decisions (see Appeals Policy)
- Allegations of malpractice or maladministration (see Malpractice and Maladministration Policy)

A complaint is an expression of dissatisfaction about CTQ's qualifications, services, actions, or lack thereof. It may also relate to the complaints handling process itself.

All CTQ policies are available to download from – <https://ctq.org.uk/>

## ACTIVITY

Before engaging with CTQ's complaints process, please consider the following:

Centre-related complaints must first be raised directly with the centre. CTQ will only investigate once the centre's own complaints procedure has been fully exhausted, unless there is clear evidence that the process was not followed appropriately.

Anonymous complaints will only be considered if they include enough specific information to allow CTQ to identify the nature of the issue, the centre, and any individuals involved.

Malpractice or maladministration concerns must be reported through CTQ's dedicated Malpractice and Maladministration Policy, not via the complaints process.

Data protection: CTQ handles all personal data in line with current UK data protection legislation, ensuring confidentiality and appropriate use at every stage.

### STAGE 1: COMPLAINT SUBMISSION

Complaints must be submitted using the Complaints Form available on our website.

Required Information:

- Complainant's name and contact details.
- Detailed description of the complaint, including relevant dates and individuals involved.
- Any supporting evidence.
- Desired resolution.

Anonymous complaints will be considered only if sufficient information is provided to conduct a fair investigation.

### STAGE 2: COMPLAINT REVIEW AND AGREEMENT

A Quality Team member will assess the complaint to determine if it falls within the policy's scope and whether it can be resolved informally.

The complainant will be informed within 5 working days if the complaint meets the scope of the policy. If a formal investigation is warranted, the process will proceed to Stage 3. Stage 3 will only occur if the complainant agrees.

### STAGE 3: INVESTIGATION

An impartial investigator, not involved in the subject of the complaint, will be appointed.

The investigator will:

- Define the scope of the investigation.
- Collect and review relevant evidence.
- Conduct interviews if necessary.

- Determine if a site visit is required if the complaint relates to a centre.

As part of the investigation, CTQ will assess whether the issue raised may have caused, or has the potential to cause, an adverse effect. Where an adverse effect is identified or suspected, appropriate steps will be taken to correct or mitigate the issue and prevent recurrence, in line with Conditions A6.2 and A7.1.

If required, CTQ will report the complaint to Ofqual promptly based on the information available at the time, and will follow up with any additional details or planned mitigation actions, in accordance with Conditions B3.5 and B3.6.

CTQ aims to complete investigations within 20 working days. If more time is needed, the complainant will be informed.

#### STAGE 4: OUTCOME AND CLOSURE

A formal written response will be provided, detailing:

- Findings of the investigation.
- Any actions taken or planned.
- Confirmation of complaint closure.

Specific details of actions taken may be withheld to maintain confidentiality, but assurance will be given that appropriate measures have been implemented.

We acknowledge that complaints may highlight issues with the potential to cause adverse effects. In line with Condition D3.3, CTQ will consider whether any adverse effects have occurred and will take all reasonable steps to prevent them from recurring.

We are committed to respectful, fair, and thorough handling of all complaints. However, CTQ will not engage with:

- Abusive, threatening or offensive communication
- Persistent or repetitive contact without new evidence
- Baseless accusations against staff or investigators

Behaviour meeting this threshold will be classified as vexatious, and further correspondence may be restricted or ceased.

## ROLES AND RESPONSIBILITIES

The following RACI matrix outlines the roles and responsibilities for key activities within this policy, ensuring clarity on who is Responsible, Accountable, Consulted, and Informed.

Activity	Responsible	Accountable	Consulted	Informed
<b>Stage 1: Complaint Submission and Initial Review</b>				
Log and acknowledge complaint	Complaints Lead	Head of Quality and Operations	—	Complainant
Assess validity and sufficiency of complaint	Complaints Lead	Head of Quality and Operations	Relevant CTQ teams	Complainant
Determine if complaint should be progressed formally	Complaints Lead	Head of Quality and Operations	—	Complainant
Confirm whether CTQ will proceed or signpost elsewhere	Complaints Lead	Head of Quality and Operations	—	Complainant
<b>Stage 2/3: Formal Complaint Agreed and Investigation Initiated</b>				
Plan investigation approach (evidence needed, visits etc.)	Complaints Lead	Head of Quality and Operations	Relevant CTQ staff / EQA	Complainant
Conduct investigation	Assigned Investigator	Head of Quality and Operations	Centre / EQA / Other parties	Complainant
<b>Stage 4: Outcome and Closure</b>				
Draft outcome report	Complaints Lead	Head of Quality and Operations	Relevant CTQ personnel	Complainant
Communicate outcome and rationale	Complaints Lead	Head of Quality and Operations	—	Complainant
Close complaint formally	Complaints Lead	Head of Quality and Operations	—	Internal record
<b>Stage 5: Request for Review of Process</b>				
Assess grounds for review (process not	Responsible Officer	Responsible Officer	—	Complainant

outcome)				
Issue final review outcome	Responsible Officer	Responsible Officer	—	Complainant
<b>Stage 5: Escalation to Board (if RO is involved)</b>				
Board reviews complaint handling process	Board	Board	Responsible Officer	Complainant
Stage 6: Escalation to Regulator (Ofqual)	Complainant	—	CTQ (for record-keeping)	Ofqual

## ESCALATION AND REPORTING

If you are dissatisfied with CTQ's response to your complaint, you may request a review. This must be based on concerns about how the complaint was handled, not the outcome itself.

Where necessary and in line with regulatory requirements, CTQ may escalate complaints to the relevant regulator, and complainants will be informed if this occurs.

CTQ complies with Ofqual's appeals and complaints processes and takes due account of their outcomes. Should any such process reveal a failure in our assessment procedures, CTQ will take all reasonable steps to identify affected learners, correct or mitigate the failure, and prevent its recurrence, as required by Conditions I2.1, I2.2, and I2.3.

### STAGE 5: REVIEW OF COMPLAINT HANDLING

If you are dissatisfied with the outcome of your complaint following the conclusion of Stage 4, you may request a formal review by CTQ's Responsible Officer (RO).

Requests for a review must:

- Be submitted within 10 working days of the date of the complaint outcome letter.
- Clearly state the grounds for the review — these must relate specifically to how the complaint was handled, not the outcome itself.
- Not include any new evidence or information that was not available at the time of the original complaint investigation.

The RO will conduct a review of the handling process only and will not re-investigate the original complaint. You will be notified in writing of the outcome of this review within 10 working days, unless the matter is complex and requires more time. In such cases, you will be informed of the revised timeframe.

If the complaint involves the Responsible Officer or they have had any prior involvement in the case, the review will be escalated to a designated member of CTQ's Governing Board. This ensures that the review is handled independently and without conflict of interest.

The decision at this stage concludes CTQ's internal complaints process.

#### STAGE 6: ESCALATION TO OFQUAL

If, after CTQ's review process (Stage 4), you remain dissatisfied with how your complaint was handled, you have the right to raise your concerns with **Ofqual**, the qualifications regulator in England.

Ofqual will not normally investigate complaints about individual assessment decisions, but may investigate concerns about:

- How CTQ has handled your complaint
- Whether CTQ has followed due process
- Potential breaches of regulatory requirements

Before contacting Ofqual, please ensure:

- You have completed all stages of CTQ's internal complaints process, including the review stage
- You can provide a clear rationale for your referral and supporting evidence where relevant

You can submit your complaint to Ofqual via:

**Online:** <https://www.gov.uk/government/organisations/ofqual/about/complaints-procedure>

**Email:** [complaints@ofqual.gov.uk](mailto:complaints@ofqual.gov.uk)

**Post:**

Ofqual  
2nd Floor  
1 Friargate  
Station Square  
Coventry  
CV1 2GN

Please note that Ofqual will not normally intervene in centre level complaints unless all internal routes have been exhausted and a regulatory concern exists.



## COMPLAINT REVIEW AND REPORTING

All complaints received by CTQ are logged systematically and reviewed on a regular basis to identify recurring themes, risks to quality, and opportunities for continuous improvement. As part of our commitment to regulatory compliance and organisational learning, we evaluate the nature and outcomes of complaints to determine whether they indicate issues, process gaps, or the potential for adverse effects in line with Condition D3.2.

Where appropriate, the outcomes of complaints may lead to changes in our policies, procedures, delivery approaches, or staff training. We are committed to taking proportionate and preventative action where needed to reduce the likelihood of recurrence and to strengthen the integrity of our qualifications and services.

Summary data is reported to the Senior Leadership Team and reviewed alongside other quality assurance indicators. Insights from complaints inform our internal review processes and strategic planning. Where issues are serious or recurring, they may be escalated to the Board for governance oversight.

## POLICY REVIEW

This policy is subject to a three-year review cycle, or earlier if feedback or concerns are raised with CTQ, to ensure it remains fit for purpose and its processes and outcomes are deliverable.

It will also be reviewed as part of CTQ's continuous improvement monitoring through its annual self-assessment arrangements.

## REGULATORY CONDITIONS AND REQUIREMENTS

CTQ is committed to meeting the requirements set out by Ofqual's Conditions of Recognition.

CTQ will ensure:

- Policies and procedures align with regulatory conditions.
- All staff understand their obligations in relation to compliance.
- A robust system is in place to identify, manage, and mitigate risks to regulatory compliance.

The table below lists the conditions to which this policy applies.

Condition reference							
A6.2	A7.1	B3.5	B3.6	C2.3	D3.2	D3.3	D4.1
D4.2	D4.3	D4.4	I2.1	I2.2	I2.3		