Royal College of Art
Postgraduate Art & Design

Student Complaints Policy 2026/27

Academic Year	2026/27
Approval date	4 November 2026
Approved by	Senate
Owner	Academic Registrar, Student Conduct and Complaints Manager
Next Review	August 2027
Related Policies	● Student Complaints Procedure ● Please see Section 1.6

1. Introduction

1.1. The Royal College of Art ('the College') is committed to providing a high-quality experience during students' studies. The College recognises, however, that students may sometimes be dissatisfied with, or have concerns about, an aspect of their experience. The College encourages students to raise concerns at the earliest appropriate opportunity and provides a clear process through which complaints can be considered and resolved.

1.2. The College defines a complaint as 'an expression of dissatisfaction [...] about something a provider has done or not done, or about the standard of service provided by or on behalf of the provider', in accordance with the Office of the Independent Adjudicator's (OIA) Good Practice Framework for Handling Complaints and Appeals (2022).

1.3. The College is committed to ensuring that complaints are handled fairly, consistently, transparently and proportionately. This Policy sets out the principles that apply to the consideration of student complaints, the matters that may be considered under the Student Complaints Procedure and the circumstances in which another College policy or procedure may be more appropriate.

1.4. The Student Complaints Procedure sets out how complaints will normally be received, assessed, considered and reviewed. The College may make reasonable adjustments to the usual arrangements where necessary to ensure that a complaint is considered fairly and appropriately. The College may also vary the usual

arrangements where this is necessary due to the particular circumstances of a case, provided that this does not materially disadvantage those involved.

1.5. Where a concern falls outside the scope of this Policy, the College will, where possible, identify the most appropriate route and explain this to the student. Where a matter may fall within more than one College policy or procedure, the College may determine that different aspects should be considered under different procedures or through a combination of processes, in accordance with this Policy.

1.6. This Policy should be read alongside the RCA Student Complaints Procedure and, where relevant, the following policies, procedures and regulations:

- Admissions Policy;
- Academic Regulations;
- Academic Appeals Policy;
- Extenuating Circumstances Policy;
- Student Academic Misconduct Policy;
- Student Misconduct and Disciplinary Policy;
- Support to Study Policy;
- Equality and Diversity Policy;
- Prevention of Harassment and Sexual Misconduct Policy for Students; and
- Freedom of Speech Code of Practice.

All policies, procedures and regulations can be found on the RCA website.

1.7. The College recognises that submitting a complaint can be a difficult experience. Students are encouraged to seek advice before submitting a complaint, where necessary:

- **The RCA Students' Union (RCASU)** is available to help students consider the merits of their complaint, advise them on their options and provide support throughout the process; and
- **The Student Casework team** manages the central administration of the Student Complaints Procedure and can be contacted in relation to procedural queries at casework@rca.ac.uk.

1.8. A student may withdraw their complaint at any time before an outcome is issued by notifying the Student Casework team in writing. Where a complaint is withdrawn, the College will normally take no further action under the Student Complaints Procedure. The College may, however, take appropriate action where information provided during the complaint raises concerns which require further consideration under another College process or in order to meet the College's legal or regulatory responsibilities.

1.9. The commencement of legal proceedings will not automatically prevent the College from considering a complaint under this Policy. The College will determine whether it remains appropriate to continue the complaints process having regard to the nature of the proceedings and the matters in dispute. Wherever possible and appropriate,

the College will seek to conclude its internal procedures so that its position on the matters raised has been clearly recorded.

2. General Principles

2.1. The College will consider complaints fairly, impartially and proportionately, having regard to the nature, seriousness and complexity of the matters raised.

2.2. Complaints will be considered by individuals who have appropriate authority and sufficient independence from the matters under consideration. The College will take reasonable steps to identify and manage any actual or perceived conflict of interest or bias.

2.3. Students will not be disadvantaged in their studies or otherwise penalised for raising a complaint in good faith or for participating appropriately in the complaints process. This does not prevent the College from taking proportionate action where conduct associated with a complaint is abusive, threatening or otherwise inappropriate.

2.4. The College will base its decisions on relevant information and evidence and will give those affected a reasonable opportunity to provide relevant information or respond to material concerns, subject to appropriate requirements of confidentiality, data protection and other legal or procedural considerations. Where the College requests clarification, information or evidence relevant to the consideration of a complaint and this is not provided within a reasonable or specified timeframe, the College may proceed to determine the matter on the basis of the information available.

2.5. Where it is necessary to make findings about disputed facts, the College will apply the balance of probabilities. This means that the College will determine whether, on the information available, it is more likely than not that the matter occurred as alleged.

2.6. The College will consider the substantive issues necessary to determine whether there has been a service failure, procedural failing or other matter requiring a remedy or corrective action. It will not normally be necessary to make separate findings on every individual assertion, item of correspondence or allegation where multiple matters arise from the same underlying issue.

2.7. The College may take proportionate action in response to abusive, threatening or otherwise inappropriate conduct associated with a complaint. This may include setting reasonable limits on communications or contact with College staff. Any such action will be considered separately from the merits of the complaint and will not, in itself, affect the consideration of the substantive issues raised.

2.8. The College will normally consider complaints within the timescales set out in the Student Complaints Procedure. Where this is not possible, the College will keep the student informed and explain the reason for any significant delay.

3. Scope

3.1. This Policy applies to complaints about acts or omissions of the College, or about the standard of service provided by or on behalf of the College, which affect a student's learning opportunity or experience and are matters for which the College has responsibility. It may cover both academic and non-academic services and complaints relating to the actions of College staff.

3.2. This Policy does not cover the following matters, for which separate procedures exist:

- Appeals against academic decisions (see the RCA Academic Appeals Policy and Procedure)
- Appeals against the outcome of an academic misconduct case (see the Student Academic Misconduct Policy)
- Complaints relating to the admissions process (see the Admissions Policy)
- Complaints relating to the Students' Union (see the RCA Students' Union Complaints Policy and Procedure)
- Complaints about the conduct of another student, including allegations of bullying or harassment (see the Student Misconduct and Disciplinary Policy)
- Decisions taken under Support to Study proceedings (see the Support to Study Policy)
- Extenuating Circumstances applications (see the Extenuating Circumstances Policy)

3.3. The Student Complaints Policy applies to students and former students of the College.

3.4. A student who has withdrawn or graduated from their studies, or is on an approved Leave of Absence, may submit a complaint, provided that the complaint is submitted within the time limits set out in Section 5.

3.5. Complaints relating to an application for admission to the College are outside the scope of this Policy and should be considered under the Admissions Policy.

4. Relationship with Other College Procedures

4.1. Where a concern may fall within more than one College policy or procedure, the College will determine the most appropriate route for considering the matter, having regard to the nature of the concerns raised and the interests of all those involved.

4.2. Where appropriate, different aspects of a matter may be considered under different procedures. The College may also run processes concurrently, pause one process while another is concluded, or take account of findings from another process where this is fair and appropriate.

4.3. Where a complaint raises matters which are more appropriately considered under another College procedure, the student will be informed of the appropriate route. This will not prevent the College from considering any aspect of the matter which falls within the scope of the Student Complaints Policy.

5. Time Limits

5.1. A student may raise a complaint **within one calendar month** of the date of the events giving rise to the complaint.

5.2. The College may accept a complaint submitted outside the time limit where there is a reasonable explanation for the delay and, having considered the circumstances of the case, it is fair and reasonable to do so. Students should not be discouraged from submitting a complaint because the time limit has passed; the College will consider whether there are circumstances that justify accepting a late complaint. This may include consideration of the nature and seriousness of the concern, the length and reason for the delay, whether relevant information or evidence remains available, whether the matter has already been considered through another process, and the potential impact of accepting or rejecting the complaint.

5.3. Where a complaint concerns a continuing matter, the relevant time limit will normally run from the most recent occurrence giving rise to the complaint.

5.4. Where the College decides not to accept a complaint because it was submitted outside the applicable time limit, the student will be informed of the reasons for the decision and, where applicable, directed to the Office of the Independent Adjudicator for Higher Education (OIA).

6. Group Complaints

6.1. Where a number of students are affected by the same or substantially similar circumstances, they may submit a complaint collectively where this is an appropriate and proportionate way of addressing the concerns raised.

6.2. A group complaint should identify the common issues being raised and, where relevant, explain any significant differences in the impact on individual students. The College will ask the group to nominate a lead representative who will act as the main point of contact.

6.3. Each student participating in a group complaint should provide written confirmation that they wish to be included in the complaint and consent to the lead representative communicating with the College in relation to the complaint.

6.4. The College may determine that some aspects of a complaint should be considered individually where the circumstances, evidence or remedy sought differ materially between students.

6.5. The College will take reasonable steps to protect the confidentiality and personal information of individual students. Information provided to a group will normally be limited to information that can appropriately be shared with the group as a whole.

6.6. Where a student no longer wishes to participate in a group complaint, the College will consider whether separate consideration is appropriate, having regard to whether the student's concerns, circumstances or remedy sought differ materially from those of the group. The College may continue to consider the remaining complaint as a group where the concerns remain substantially the same.

6.7. The outcome of a group complaint will normally be provided to the lead representative on behalf of the group. Where the outcome includes matters specific to individual students, these will be communicated to the relevant student separately. Each student participating in the group complaint will be provided with a Completion of Procedures Letter at the end of the internal complaints process.

7. Complaints Against a Member of Staff

7.1. Where a complaint concerns the conduct or actions of an individual member of staff, the complaint will normally be considered as a complaint about the College rather than as a disciplinary complaint against the individual. The purpose of the Student Complaints Procedure is to determine whether the student's concerns are justified and, where appropriate, what action or remedy should be provided by the College.

7.2. The College will determine whether any aspect of the complaint should be referred to People and Culture or considered under another relevant College procedure. Where separate processes are required, the College will determine whether they should operate concurrently or whether one process should be paused pending the outcome of another, having regard to fairness, confidentiality and the need to avoid unnecessary duplication.

7.3. The fact that a complaint names an individual member of staff will not, in itself, determine the stage or process through which the complaint is considered.

7.4. A member of staff who is the subject of allegations will normally be provided with sufficient information about the concerns to enable them to respond, subject to the requirements of confidentiality, data protection, safeguarding and any other applicable legal or procedural requirements.

7.5. Information relating to any separate People and Culture or other staff process will not normally be disclosed to the student where doing so would breach confidentiality or the rights of another individual. The College will, however, provide the student with sufficient information about the outcome of their complaint to explain the decision reached and any action taken within the scope of the complaints process.

7.6. The Complaints Policy and Procedure cannot be used to impose disciplinary sanctions on members of staff. Any disciplinary or employment action will be considered under the relevant College procedure.

8. Complaints Against Other Students

8.1. If a student wishes to complain about the conduct of another student, this should be raised under the Student Misconduct and Disciplinary Policy.

9. Contractors, Partners and Other Service Providers

9.1. Where a complaint concerns a service provided by a contractor, partner, placement provider or other organisation acting on behalf of or in connection with the College, the College will determine the appropriate route for considering the concern.

9.2. Where the matter falls within the College's responsibilities, the College will take reasonable steps to ensure that the concern is appropriately considered, including where necessary by liaising with the relevant organisation.

9.3. The College may take account of the contractual or other arrangements governing the service when determining the appropriate response, but will not normally require a student to pursue an external organisation's complaints process where the matter properly concerns the College's own responsibilities.

10. Freedom of Speech

10.1. Where a complaint raises issues relating to freedom of speech or academic freedom, the College will consider any relevant legal and regulatory obligations when determining how the complaint should be handled.

11. Anonymous Complaints

11.1. The College may consider anonymous complaints or information about concerns affecting students.

11.2. Where a complaint is submitted anonymously, the College will assess whether sufficient information is available to enable the concern to be considered or investigated. The College may be limited in its ability to investigate an anonymous complaint, seek further information, provide a substantive response or take specific action because the identity of the complainant is unknown.

11.3. The College may take appropriate action in response to information provided anonymously where the circumstances indicate that further consideration or action is warranted, including where the information raises concerns relating to safeguarding, serious misconduct, harassment, discrimination, health and safety or other matters requiring the College's attention.

11.4. Where the identity of a complainant is known but the complainant asks that their identity be withheld, the College will consider the request but cannot guarantee anonymity where disclosure is necessary to investigate or address the concern.

12. Vexatious or Malicious Complaints

12.1. The College may decide not to accept, investigate or continue considering a complaint where, having regard to the circumstances of the individual case, it considers that the complaint is vexatious, malicious or frivolous, or that it would otherwise be inappropriate or not reasonably practicable to continue considering the complaint under this Policy

12.2. Circumstances which may indicate that a complaint falls within paragraph 12.1 include where:

- the matter has already been appropriately considered and concluded, and no new information has been provided which would reasonably warrant further consideration;
- the complaint substantially duplicates matters which are being or have been considered, through another appropriate College process;
- the complaint is pursued primarily to cause distress, disruption or harassment;
- the complaint forms part of a pattern of repeated or persistent complaints about the same or substantially similar matters which have already been appropriately considered; or
- the circumstances mean that it is no longer reasonably practicable or appropriate to continue considering the complaint under this Policy.

12.3. A complaint will not be considered vexatious solely because a student has raised the same or similar concerns previously, has challenged a decision, or has continued to correspond with the College. However, persistent or repeated contact may be considered vexatious where, taken together with other factors, it is unreasonable and is having a disproportionate impact on the College's ability to respond to the complaint or perform its functions.

12.4. Where the College decides not to accept, investigate or continue considering a complaint under this section, the student will be informed in writing of the decision and the reasons for it, together with information about any further review rights available under the Student Complaints Procedure.

12.5. The College may consider whether conduct associated with a complaint should be referred for consideration under the Student Misconduct and Disciplinary Policy where the conduct may constitute a breach of that policy. Where appropriate, the College may also take other action necessary to meet its legal obligations or protect members of the College community.

13. Representation and Third-Party Complaints

13.1. Students may seek advice and support from the RCA Students' Union or another appropriate person when raising or pursuing a complaint.

13.2. A student may be accompanied or represented by an appropriate person during the complaints process. This will normally be another student, an RCA Students' Union representative or a friend from outside the College.

13.3. Where a student wishes another person to communicate with the College or act on their behalf in relation to a complaint, the student must provide appropriate consent.

The College may communicate directly with the student where this is reasonably necessary.

13.4. A complaint may be submitted or pursued by a third party on behalf of a student where the student has provided appropriate consent. The College may require confirmation of the student's consent before corresponding with the third party or disclosing information about the complaint.

13.5. The College may make reasonable procedural arrangements concerning the involvement of a representative or third party to ensure that the complaints process remains fair, proportionate and manageable.

13.6. The complaints process is an internal College process and is not intended to be a legal process. Legal representation is therefore not normally required. Where a student chooses to involve a legal representative, the College will continue to manage the complaint in accordance with this Policy and the Student Complaints Procedure.

14. Outcomes and Remedies

14.1. A complaint may be upheld, partially upheld or not upheld. The outcome will explain the reasons for the decision and address the substantive concerns necessary to determine the complaint.

14.2. Where a complaint is upheld or partially upheld, the College will consider whether any appropriate and proportionate remedy or corrective action is required. Depending on the circumstances, this may include an explanation, apology, correction of information or records, remedial action, service improvement or a review of relevant policies or procedures.

14.3. Where a complaint identifies a wider or systemic issue, the College may consider whether further action is required beyond the individual remedy provided to the complainant.

15. Completion of Procedures and External Review

15.1. The College's internal complaints process will normally be considered exhausted when the final stage available under the Student Complaints Procedure has been completed or when the College has determined, in accordance with the Student Complaints Procedure, that there is no further internal stage available.

15.2. Where the College's internal procedures have been completed, the College will issue a Completion of Procedures Letter confirming that the internal process has concluded and explaining the student's right to complain to the Office of the Independent Adjudicator for Higher Education (OIA).

15.3. The Completion of Procedures Letter will include information about the applicable time limit for bringing a complaint to the OIA and how the student can obtain further information about the OIA's process.

15.4. The College will cooperate with any subsequent review by the OIA and will provide relevant information in accordance with the OIA's requirements, subject to applicable confidentiality and data protection obligations.

16. Monitoring and Governance

16.1. The College will monitor complaints and their outcomes to identify trends, recurring concerns and potential areas for improvement. Information arising from complaints may be used to inform improvements to policies, procedures, services and the student experience.

16.2. Appropriate anonymised information and analysis relating to complaints will be reported through the College's relevant governance and management arrangements to support oversight, assurance and continuous improvement.

17. Equality, Accessibility and Support

17.1. The College is committed to ensuring that its complaints process is accessible, inclusive and capable of accommodating the individual circumstances of students. The College will have regard to its obligations under the Equality Act 2010 and other applicable equality and accessibility requirements.

17.2. Reasonable adjustments will be considered and, where appropriate, implemented throughout the complaints process to ensure that a student is not placed at a disadvantage because of a disability. Adjustments may include changes to communication methods, additional time, alternative formats, support with meetings or other reasonable measures.

17.3. Students who require an adjustment or additional support should notify the Student Casework team via casework@rca.ac.uk as early as possible. The College will consider requests sensitively and will seek to agree appropriate arrangements with the student.

18. Confidentiality and Record Keeping

18.1. Information provided in connection with a complaint will be handled in accordance with applicable data protection legislation and the College's information governance policies.

18.2. Information will only be shared with individuals who have a legitimate need to access it for the purpose of administering, investigating, determining or reviewing a complaint, or where disclosure is otherwise required or permitted by law.

18.3. The College will take reasonable steps to maintain the confidentiality of information provided during the complaints process. However, confidentiality cannot be guaranteed where disclosure is necessary to investigate or address a concern, comply with a legal obligation, protect an individual or otherwise act lawfully.

18.4. Complaint records will be retained in accordance with the College's records retention schedule and applicable legal and regulatory requirements. The College will retain sufficient records to demonstrate how a complaint was considered, the decision reached, the reasons for that decision and any action taken.

18.5. Where appropriate, records will be retained for sufficient time to enable the College to respond to any subsequent review, including consideration by the Office of the Independent Adjudicator (OIA).

Key Definitions

Academic Registrar	The College's senior officer responsible for academic administration and governance, or an appropriately authorised nominee.
College	Royal College of Art
Complainant	The person who submits a complaint under this Policy.
Complaint	an expression of dissatisfaction [...] about something a provider has done or not done, or about the standard of service provided by or on behalf of the provider
Completion of Procedures Letter	The letter issued by the College confirming that its internal Student Complaints Procedure has been completed and explaining the student's right to refer the matter to the OIA.
Group Complaint	A complaint submitted collectively by a number of students affected by the same or substantially similar circumstances, in accordance with Section 6.
Office of the Independent Adjudicator for Higher Education (OIA)	The independent body responsible for reviewing student complaints after a provider's internal procedures have been completed.
People and Culture	The College's human resources function, responsible for staff disciplinary and conduct matters.
Student	Any person registered on a programme leading to an award of the Royal College of Art, including a recently interrupted, withdrawn or graduated student.
Student Casework team	The team responsible for the central administration of the Student Complaints Procedure, including initial review, case management and communication with students.
Working Day	Any day on which the College is open for business, excluding Saturdays, Sundays, public holidays and College closure days.