(A) Complaints Policy

FOR THE OFQUAL READER –
Please note this is the current policy in place with our current EPAO (non-Centre) delivery.

December 2022

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<th>Updated email address</th>
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1. PURPOSE

Chartered Institution of Railway Operators (CIRO) is committed to providing a quality service for its members and learners, working in an open and accountable way that builds the trust and respect of all our stakeholders. Unfortunately, things sometimes go wrong and one of the ways in which we can continue to improve our service is by listening and responding to the views of our members, learners, customers and stakeholders, and in particular by responding positively to complaints, and by putting mistakes right.

CIRO recognises that many concerns may be raised informally and can be dealt with quickly and simply. Complaints will be resolved early and promptly, preferably keeping it as close to the source of the problem as possible and dealing with it by informal means. By encouraging complainants to come forward with concerns at an early stage, matters can be discussed, and any misunderstandings resolved by telephone conversation, face to face meeting, email or letter to the appropriate person.

2. DEFINITIONS

- A complaint is an oral or written expression of dissatisfaction or concern relating to CIRO’s service provision delivered to its members and learners
- A learner is the generic term for anyone enrolled on any CIRO course or on an EPA assessment
- CIRO course is the generic term for short courses, academic courses and apprenticeships offered by the Institution
- Complainant is the person who has made the complaint

3. POLICY STATEMENT

CIRO strives to provide the highest quality services and to being excellent in all that we do, but we do recognise that our practices could always be improved. When we fall short of the high standards we set for ourselves, we would like to hear about it. We take all feedback seriously – both good and bad – and treat all feedback as an opportunity to develop.

Complaints received and their outcomes will be reviewed within the governance channels of their respective departments and ultimately by the Board.

4. AIMS OF THE POLICY

The aim of this policy is to ensure CIRO is responsive to concerns or complaints from any of our stakeholders. Both negative and positive feedback is recognised as a valuable resource to enable us to improve the quality of our services and learning provision.

All complaints will be dealt with promptly and consistently and handled with courtesy and fairness. As a result of a complaint, CIRO will aim to rectify the issue and improve our service.

All complaints will be taken seriously and in order that CIRO can learn and improve, accurate and complete records of all complaints received, resulting correspondence, interviews and actions taken will be maintained.
5. **SCOPE OF THE POLICY**

CIRO recognises that our stakeholders may wish to raise matters of concern about our services or provision and bring them to our attention, so that they can be investigated and resolved in the clearest and fairest way possible.

This complaints procedure is for use by any existing member, learner, employer, apprentice provider, or customer who seeks or receives a service from us. It also extends to anyone who may be directly affected by our services or activities.

Anonymous complaints will be logged and monitored but not investigated under normal circumstances.

6. **COMPLAINTS PROCEDURE**

The purpose of this procedure is to provide a framework for the complaints process to ensure that complaints are:

- acknowledged promptly
- taken seriously and properly investigated
- dealt with confidentially and fairly
- responded to appropriately
- learned from

1. **Reporting a Concern**

CIRO recognises that many concerns will be raised informally and dealt with quickly and an informal approach is appropriate when it can be achieved. But if concerns cannot be satisfactorily resolved informally, then the formal complaints procedure should be followed, which should be seen as a last resort in reaching a solution.

2. **Informal Complaints:**

An informal approach is appropriate in some cases, enabling issues to be resolved early and promptly, preferably keeping it as close to the source of the problem as possible and dealing with it by informal means.

These issues will be raised with, and responded to, by the appropriate CIRO team member. If, however the issue is cannot be resolved at this stage, the issue will be raised by the CIRO team member and/or complainant with the Senior Awarding Manager and the formal complaint procedure will be followed.

3. **Formal Complaints:**

In some cases, an informal approach may not be appropriate due to either the seriousness or sensitive nature of the issue or a conflict with the appropriate CIRO team member. In these circumstances the formal complaints procedure route should be followed.

**Complaint Notification:**

The details of the complaint should be sent in writing to the Senior Awarding Manager, providing as much information as possible and including any supporting documentation.

Complaints can be reported by the following methods:

- Email: epa@railwayoperators.co.uk
- Post: Chartered Institution of Railway Operators
  Beacon Building 2nd Floor
  Stafford Enterprise Park West
  Weston Rd
  Stafford, ST18 0BF

**Complaint Recording:**
All complaints received will be logged on the Complaints Log and a Complaint Form will be raised and issued to the appropriate person for investigation. The Senior Awarding Manager will contact the complainant within 5 working days to acknowledge receipt of the complaint.

**Complaint Investigation:**
The appropriate person will fully investigate the complaint and take any necessary corrective action. Details of the investigation and corrective action will be recorded on the Complaint Form and returned to the Senior Awarding Manager. This will normally be completed within 28 working days; however, more complex issues may take longer. In these circumstances the Senior Awarding Manager will contact the complainant with a progress report.

**Corrective Action:**
The details of the immediate corrective action carried out to address the complaint are recorded by the person investigating the complaint.

**Root Cause Analysis:**
The Senior Awarding Manager will complete a root cause analysis with the person investigating the complaint, and any other relevant staff members, to identify the root cause of the problem.

**Preventative Action:**
Preventative action is the change implemented to address the weakness in the system identified following the root cause analysis, to help prevent a reoccurrence of a similar issue. The Senior Awarding Manager will record the details of the action taken.

**Closing a Complaint:**
The Senior Awarding Manager will review the complaint preventative action taken to ensure that the complaint has been resolved. The Complaint Form will be filed on CIRO’s secure Intranet (SharePoint) in the complaints folder and the Complaints Log updated.

There are three possible outcomes:

- The complaint is upheld – on the basis that the grounds and evidence justify the complaint
  
  CIRO follow up action will vary according to the nature of the complaint

- The complaint is not upheld – on the basis that the grounds and evidence do not justify the complaint

- The complaint is withdrawn

**Complaint Monitoring and Review:**
The Senior Awarding Manager will review complaints on a monthly basis and any trends will be identified.

**Complaint Reporting:**
The Senior Awarding Manager will report complaints which will be formally reviewed at CIRO departmental meetings and Quality Assurance Meetings.

A quarterly report will be produced for the CIRO Board and this report will highlight trends and identify any business risk.

7. **Confidentially**
All complaints will be treated seriously, handled sensitively and with due consideration to all parties involved. All complainants will be treated fairly and not suffer any recrimination or disadvantage as a result of making a complaint.

Any person named in a complaint, however will be informed and have a right of reply as part of the investigative process.
Complaints must be made by complainants themselves, however, we recognise that some apprentices and vulnerable adults may have difficulties with this and so encourage them to use whatever assistance is required from a third party to make their complaint effectively.

8. **Appeals Procedure**

A copy of the complaint (with any supporting evidence) should be sent to the Senior Awarding Manager within 21 working days of receiving the response to the complaint, detailing the grounds for seeking an appeal:

- The complainant believes there has been an error in the process of the complaint investigation
- The complainant believes there is additional evidence that was not considered in the complaint investigation.

The Senior Awarding Manager will collate all of the relevant details and submit this the CEO for review.

The CEO will investigate the complaint, including all documentary evidence. Following investigation, a written response will be produced detailing whether the complaint is upheld or not and detailing action(s) necessary to resolve the issue.

CIRO’s decision will be final.

Complainants who have followed and exhausted the appropriate procedures and are still dissatisfied with the outcome may contact the relevant body depending on the nature of the complaint.

**CIRO membership complaints:**
The details of why the complainant is dissatisfied with the outcome of the CEO’s decision must be made in writing to the Chair of the CIRO Board, within 14 days of receiving the written response from the CEO.

The letter must be sent to:

Chair of the Board of Directors  
Chartered Institution of Railway Operators  
Beacon Building 2nd Floor  
Stafford Enterprise Park West  
Weston Rd  
Stafford, ST18 0BF

The Senior Awarding Manager will notify the complainant to inform them that complaint has been received and sent to the Chair of the CIRO Board, The Chair, or their nominee, will contact the complainant to notify them of details and outcome of the investigation.

**CIRO Academic Student complaints:**
CIRO Certificate, Diploma and Degree students have the option to contact Glasgow Caledonian University Department of Governance and Quality. Details of the complaints handling procedure can be found on the Glasgow Caledonian University Website

**CIRO Apprenticeship complaints:**
CIRO Apprentices have the option to raise a complaint to the Education and Skills Funding Agency (ESFA).

**End-Point Assessment (EPA) complaints:**
Apprentices have the option to raise a complaint to the Institute for Apprenticeships and Technical Education.
9. CROSS-REFERECED DOCUMENTS
   • CIRO Equality & Diversity Policy
**APPENDIX A – COMPLAINT FORM**

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<td>Complaint Ref.:</td>
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<td>Date of Complaint:</td>
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<td>Received By:</td>
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Complaint Details (provide as much detail as possible & attach any supporting documents)

Details of Investigation

| Investigated by: | Date: |
| Corrective Action Taken |

| Completed by: | Date: |
| Root Cause Analysis |

| Completed by: | Date: |
| Preventative Action Taken and Review |

| Reviewed by: | Date: |
| Complaint Closed: | Yes | No |

*details of additional actions taken are recorded overleaf*
Appendix B – Flow Chart

Stage 1

Complaint submitted in writing to CRO with
- Signature and Date
- Full name and Address
- Centre name and qualification details
- Details of the complaint
- Evidence to support the complaint
- Any names of the people you have dealt with so far.

CRO: Acknowledgement of the complaint

Stage 2

CRO: Check validity of complaint
- All required documentary evidence has been supplied
- Complaint falls within the same time frame, scope, and definition as determined above

CRO: Request further information within defined timescale if required.

Complainant provides further information if requested.

CRO: Investigates and considers the complaint with all parties

CRO: Responds to complainant with a final decision

Stage 3