



Commonwealth Scholarship Commission in the UK

COMMONWEALTH SCHOLARSHIP COMMISSION IN THE UNITED KINGDOM

CSC Complaints Policy

1. Purpose and scope

- 1.1. This policy sets out the way in which individuals may raise complaints that they have regarding the CSC and how those complaints will be dealt with. It relates to complaints against actions taken by the Commonwealth Scholarship Commission (CSC), its members, members of the CSC Secretariat, any other organisation contracted to provide specific administrative or other services on the CSC's behalf, over which it can reasonably be expected to have control (hereafter referred to as 'CSC delivery partners'), and CSC Scholars and Fellows in so far as their actions are related to the CSC, subject to the qualifications below.
- 1.2. In all cases, before a complaint is lodged all reasonable efforts should be made to resolve the matter before invoking the formal Complaints Policy.
- 1.3. The policy does not:
 - apply to reporting of actual, attempted or suspected fraud, corruption or bribery. Reporting of fraud, corruption or bribery should follow the CSC's Anti-Fraud, Bribery and Corruption Policy;
 - apply to reporting of safeguarding concerns. Safeguarding concerns should be reported using the CSC Safeguarding Policy.
 - apply to any complaint about the actions of a university or other host organisation at which a Commonwealth Scholar or Fellow is based. Such complaints should be addressed directly to the institution involved; If having completed the complaint process of the university the complainant is not satisfied with the response from the university, the complainant has the right to refer the complaint to the Office of the Independent Adjudicator for Higher Education
 - apply to individual selection or placement or on award decisions of the CSC, unless the complaint concerns an alleged breach of procedure.
 - apply to complaints considered to be frivolous (unfounded or trivial) or malicious (with vindictive motivation)
- 1.4. Complaints about breaches of the Scholar Code of Conduct will be considered under the CSC Disciplinary Policy This Policy is in addition to any other rights of complaint that may be available under UK law regarding Non-Departmental Public Bodies. It does not seek to replace these procedures, however those making complaints should take into account that

a failure to use the CSC's own policy in the first instance might later be regarded as a significant weakness in any such case.

2. Reporting a Complaint

- 2.1 The Commission reserves the right to refuse to investigate or to suspend any investigation underway where it becomes aware that police, court or tribunal proceedings have been initiated in relation to the issues raised in the complaint. Similarly, if there are allegations of a criminal offence, the Commission may refer the matter to the police and suspend our own proceedings until the outcome of any police investigation or criminal proceedings are known.
- 2.2 This process is designed to deal with genuine complaints that are made in good faith. Submission of a complaint that is found to be fictitious or is made in bad faith (e.g., out of spite or for personal gain) would result in disciplinary action being taken under the disciplinary process. This will be referred to the Chair of Audit Risk Management Committee (ARM) for consideration
- 2.3 Where the complaint is against a CSC delivery partner (including a nominating agency, contracted travel or finance provider, or the British Council), the complaint should be raised in the first instance with the organisation concerned, according to their complaint procedure.
- 2.4. Complaints relating to immigration advice given to Scholars and Fellows should be addressed through the ACU complaints processes via the e-mail address provided in the client Care Letter.
- 2.5 Where the complaint is against the CSC, the CSC Secretariat, a Scholar or Fellow, or against a CSC delivery partner but it would not be appropriate to address the complaint with the partner directly (or an unsatisfactory response has been given when the complaint was made directly), the complaint should be made in writing to the CSC addressed to the Head of CSC (or the Deputy Chair of the Commission only if the complaint is against the Head of CSC), either by email to complaints@cscuk.org.uk or clearly marked as a complaint by post to Commonwealth Scholarship Commission, Woburn House, 20-24 Tavistock Square, London, WC1H9HF, United Kingdom.

3. Investigation and Response

- 3.1 The CSC/CSC Secretariat will acknowledge receipt of a complaint within 10 working days
- 3.2 The CSC reserves the right to inform any party against whom a complaint is directed of the nature of the complaint, for the purpose of obtaining information necessary to reach a decision. Where the complainant wishes to remain anonymous this should be clearly stated in the complaint. Where informing the party involved of the complaint would compromise their anonymity, the CSC will not inform the party without seeking express permission from the complainant in advance. The CSC's Public Interest Disclosure (Whistleblowing) Policy may also be invoked if appropriate in order to maintain confidentiality.
- 3.3 The CSC may, where it considers it appropriate, appoint an impartial third party to undertake the investigation

- 3.4. The CSC will, after considering the full evidence presented in the complaint, respond in writing to the complainant within 30 working days of the complaint being received.
- 3.5 If the complaint is upheld, any action taken must wait either until the party against whom the complaint has been made confirms in writing that they do not wish to appeal and explicitly, in writing, waives their right to do so or the time period for making an appeal has passed.

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Complaints Procedure

1. Receipt of Complaint

- 1.1 Complaints emailed to complaints@cscuk.org.uk or received by post will be directed to the Head of CSC or their delegate.
- 1.2 The Head of CSC or their delegate will log the complaint on the Complaints Register.
- 1.3 The Head of CSC or their delegate will assess whether the complaint falls within the Complaints Policy.
- 1.4 Within 10 working days of receipt of the complaint, the Head of CSC or their delegate will either acknowledge receipt of the complaint or respond noting that the matter falls outside the Complaints Policy. The Head of CSC may refer the complainant to another policy if appropriate (such as the Anti-fraud, Bribery and Corruption, Disciplinary or Safeguarding Policy).
- 1.5 The response will be made to the complainant by the communication method in which the complaint was received.

2. Investigation

- 2.1 The Head of CSC, or their delegate will consider the full evidence of the case and investigate as appropriate and proportionate and will, in consultation with the Deputy Chair of the Commission agree:
 - (a) that the complaint is not justified and should be rejected;
 - (b) that the complaint is justified or partially justified and agree the outcomes of the complaint
 - (c) in exceptional circumstances that the complaint should be further considered by a committee of Commission members convened specifically for the purpose. Such a committee may meet in person or virtually.

3. Communication of decision

- 3.1 In the event of (a) or (b) above the Head of CSC or their delegate shall inform the person making the complaint and if the complaint was against an individual within the Commission or Secretariat, the party against whom the complaint was made, of the decision within 10 working days of it being made.
- 3.2. In the event of (c) the Head of CSC or their delegate will notify the person making the complaint of an anticipated date by which a decision is expected, taking into account reasonable delays in assembling the views of the Committee.

4. Reporting

- 4.1 The details and outcome of the complaint will be recorded in the Complaints Register.

- 4.2 A summary of the Complaints Register will be tabled to the Audit and Risk Management Committee of the CSC once a year. The tabled summary will maintain the confidentiality of the individuals making the complaint/s, and the subject of the complaint, as far as may be practical. Where appropriate, changes in policy or practice resulting from any complaint will also be recorded in the minutes of the meeting concerned.

Review Date	24 March 2022
Next Review Date	March 2025