AEGIS Complaints Policy

January 2025

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

AEGIS Complaints Policy

Introduction

Purpose

This policy seeks to address complaints about:

An AEGIS-accredited guardianship organisation, AEGIS itself, an AEGIS employee, an AEGIS trustee or an independent inspector undertaking AEGIS inspection work. It aims to handle complaints correctly, thoroughly, openly, honestly and fairly.

Who Can Complain

Anyone can complain if they believe an AEGIS-accredited guardianship organisation has fallen below the expected AEGIS Quality Standards or they have a complaint about AEGIS itself, an AEGIS employee, an AEGIS trustee or an independent inspector undertaking AEGIS inspection work.

Exclusions

This procedure does not cover complaints listed in Annex 1.

Anonymous Complaints

Anonymous complaints cannot usually be investigated, unless the CEO (or Chair of Trustees if the complaint is about CEO) decides there are exceptional circumstances.

Timeframes

Timeframes are detailed at each stage of this policy, however under circumstances in which the complaints are unusually complex or complicated time frames may be extended in order to complete a thorough investigation.

Adjustments

Reasonable adjustments will be made for complainants who need support, such as accessible formats or meeting locations.

Key Principles

- Complainants should initially attempt to resolve issues informally.
- Concerns must be raised directly with the guardianship organisation or AEGIS and not on social media, as this can harm reputations and be unhelpful in the process.
- Complaints will be handled through a staged process, with most issues resolved at the informal stage,
- Staff and complaints will be treated respectfully.
- Concerns should be raised promptly. Complaints older than 3 months will only be considered if the CEO (or Chair of Trustees if complaint is about CEO) agrees there is a good reason for the delay.
- If multiple people raise similar complaints, a group procedure will be followed for efficiency.

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

- If timelines need to change, complainants will be notified with an explanation and new deadlines. External investigations (e.g., police or safeguarding) may delay the process. If more clarity is needed over a complaint, a pause will occur until necessary information is received.
- If legal action is taken, the complaints procedure may be paused until the legal process is complete.
- Complainants wishing to withdraw their complaint must confirm in writing.

Record Keeping

Records of all formal complaints, including their outcomes, will be maintained with confidentiality, except in legal circumstances or when required for guardianship organisation inspections.

Stage 1: Informal Concerns

1.1 In the first instance, complaints should be made informally to the guardianship organisation or AEGIS. It is advised that a record is kept, in chronological order, of all correspondence, subsequent responses and action taken. It is hoped that the matter will be resolved satisfactorily between the parties involved at this stage. Open dialogue to resolve issues is encouraged

1.2 The complainant should clearly explain their concern and desired outcome. They may be invited to an informal meeting, in person or online, with the appropriate staff member.

1.3 Concerns about the AEGIS CEO should be directed to the Chair of Trustees at Stage 2.

1.4 Informal concerns should be resolved within 15 working days. If no resolution is reached, the complainant should escalate the concern to Stage 2 within 15 days.

Stage 2: Formal Written Complaints

2.1 If your concern is not resolved at Stage 1, a formal written complaint should be submitted, addressed to the CEO of AEGIS who will investigate your complaint. If the complaint is about the CEO, it should be escalated to the Chair of Trustees.

2.2 Your complaint should use the Complaint Form detailed in Annex 2 and must include:

A clear statement of your concern

- · Details of actions taken so far
- · Names of witnesses, dates, times, and relevant documents
- · The resolution you are seeking

2.3 For complaints against an AEGIS accredited guardianship organisation, the provided Complaint Form (Annex 2) must be completed detailing the relevant AEGIS Quality Standards which have been breached.

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

2.4 Complaints will be acknowledged within 5 working days, with a response within 15 days.

2.5 If necessary, the CEO may invite the complainant to a meeting, typically via Zoom, to discuss the complaint. A companion for support is permitted. This meeting should take place within 10 working days.

2.6 The investigation may involve interviewing witnesses. If the complaint concerns staff, they will be given a chance to respond.

2.7 Once the investigation is complete, the complainant will receive a written response outlining the outcome and any actions to be taken.

2.8 If the complainant is dissatisfied, they may escalate the complaint to Stage 3.

2.9 If the complaint involves an AEGIS-accredited guardianship organisation, an AEGIS employee, an AEGIS trustee or an independent inspector undertaking AEGIS inspection work, it may be shared with them for investigation purposes.

Stage 3: Complaints Panel Hearing

3.1 If the complainant is dissatisfied with the Stage 2 decision, they may request a review by the Complaints Panel, which will assess how the complaint was handled at previous stages.

3.2 A Complaints Panel, consisting of three trustees, one of whom will act as chair, will be appointed by the trustees to hear the grievance.

3.3 Both parties will be invited to make formal representations. The hearing will provide an opportunity for all parties to present their case to the Complaints Panel. The procedure will be explained in advance via email.

3.4 To request a hearing, the complainant must write to the Chair of Trustees within 15 working days of receiving the Stage 2 outcome, including relevant documents and the resolution sought.

3.5 The Chair will acknowledge the request within five working days and arrange a panel hearing within 15 working days.

3.6 Following the hearing, the Complaints Panel will deliberate and communicate their decision in writing within 5 working days to both the complainant and, where relevant, the subject of the complaint. The letter will set out the decision of the panel together with the reasons underpinning that decision. The panel can (by a majority if necessary):

- dismiss the complaint in whole or in part;
- uphold the complaint in whole or in part;
- decide on the appropriate action to be taken to resolve the complaint;
- recommend changes to the guardianship organisation or AEGIS or procedures to ensure that problems of a similar nature do not happen again.

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

Complaints Panel Guidelines

- The Chair of the Complaints Panel has a key role in ensuring that the meeting is conducted in a professional manner, is not adversarial, and that, if all parties are invited to attend, everyone is treated with respect and courtesy.
- The written material must be seen by everyone in attendance (provided it does not breach confidentiality or any individual's rights to privacy under the DPA 2018 or GDPR).
- Both parties are given the opportunity to make their case, and seek clarity, either through written submissions ahead of the meeting, or verbally in the meeting itself.
- The Complaints Panel is open-minded, acts independently and no panel member has an external/pecuniary interest in the outcome or any involvement in an earlier stage of the procedure
- The meeting is minuted.

4. Repetitious, Vexatious and Unreasonable Complaints

In rare cases, we may deviate from our usual Complaints procedure (Parts 1 and 2). This includes:

4.1 Repetitious Complaints

If a complaint has already been fully addressed and a clear response provided, the complainant will be informed in writing that the process is complete, and no further engagement will occur.

4.2 Vexatious Complaints

A complaint may be deemed vexatious if it is:

- Persistent, obsessive, or harassing
- Unrealistic or unreasonable in its demands
- Designed to cause disruption or annoyance

Examples include refusing to co-operate, changing the complaint repeatedly, making excessive demands, or spreading false information. In such cases, further engagement may be refused.

4.3 Unreasonable Conduct

If a complainant behaves in an aggressive, abusive, offensive, or threatening manner, the following actions may be taken:

- Inform the complainant that their pursuit of the complaint is unreasonable and request that they stop.
- Handle the complaint without a hearing.
- Refuse to consider the complaint further.

Additionally, contact may be restricted, such as limiting communication to letters or a named person, or banning the complainant from AEGIS events. If their behaviour poses a serious threat, the police may be involved, or legal action may be taken without prior warning.

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

Annex 1: Matters Excluded from the Scope of this Policy

Excluded Matters	Signposting
Child protection matters	Complaints about child protection matters are handled under our child protection and safeguarding policy and in accordance with relevant statutory guidance. If you have serious concerns, you may wish to contact the local authority designated officer (LADO) who has local responsibility for safeguarding or the Multi-Agency Safeguarding Hub (MASH).
Complaints about schools	Schools have their own complaints procedure to deal with complaints. Please contact them directly.
Whistleblowing	AEGIS upholds transparency, integrity and accountability in inspections and accreditation. Concerns about poor practice should follow this AEGIS complaints procedure. However, serious issues can be reported through the Whistleblowing Policy. Everyone has a duty to raise concerns without fear of reprisals. See the AEGIS Whistleblowing Policy for details.

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

Annex 2: Complaints Form

Your name:
Name of your organisation where applicable:
Your address and postcode:
Your daytime telephone number:
Your evening telephone number:
Your email address:
Please summarise your complaint: (if you have more than one complaint, please number these)
Please state the AEGIS Quality Standards (available here: AEGIS Quality Standards) which you believe have been breached: (please reference number & wording)
What action have you already taken to try and resolve your complaint(s) in accordance with Stage 1 of the AEGIS complaints procedure? (e.g. Who did you speak to and what was the response?)
What would you like as an outcome from your complaint(s)?

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

Are you attaching any paperwork? If so, give details here:

Your signature …… Date ……..

All functions of the complaints procedure must adhere to the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000.

Please complete and return to the AEGIS CEO or Chair of Trustees (as appropriate).

Chief Executive Officer:	Yasemin Wigglesworth yasemin@aegisuk.net
Chair of the Trustees:	Edward May edward@aegisuk.net

Copyright ©2025 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.