



SURKOVSKY CENTRE LTD

COMPLAINTS PROCEDURE

Complaints Handling, Investigation and Resolution Procedure

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1. Introduction

Surkovsky Centre Ltd is committed to maintaining the highest standards of professionalism, integrity, transparency and accountability in all aspects of its educational, scientific, research and professional activities.

The Company recognises that complaints provide valuable opportunities to identify weaknesses, improve organisational performance and strengthen confidence among students, researchers, partners, clients, employees and the wider public.

This Procedure establishes a clear, fair, transparent and consistent framework for receiving, assessing, investigating and resolving complaints concerning the activities, services, decisions or conduct of Surkovsky Centre Ltd.

The Company is committed to ensuring that every complaint is handled respectfully, objectively, confidentially and without unnecessary delay.

Individuals raising genuine concerns in good faith shall not suffer discrimination, retaliation or any other disadvantage as a consequence of submitting a complaint.

2. Purpose

The purpose of this Procedure is to establish a structured process for the effective management of complaints.

This Procedure aims to:

- provide a fair and accessible complaints process;
- ensure complaints are investigated consistently and objectively;
- protect the rights of complainants and other persons involved;
- encourage early resolution where appropriate;
- improve the quality of Company services;
- identify opportunities for organisational improvement;
- strengthen public confidence in the Company's governance.

Complaints shall be regarded as an important source of organisational learning and continuous improvement.

3. Scope

This Procedure applies to complaints arising from activities undertaken by Surkovsky Centre Ltd including:

- education and training;
- scientific research;



- consultancy services;
- conferences and seminars;
- academic publications;
- professional development programmes;
- online learning;
- customer services;
- administrative services;
- corporate communications;
- partnerships and collaborative activities.

This Procedure applies irrespective of whether the activity takes place:

- within the United Kingdom;
- internationally;
- online;
- at Company premises;
- at partner institutions;
- during events organised by the Company.

This Procedure applies to all persons acting on behalf of Surkovsky Centre Ltd.

4. Guiding Principles

The handling of complaints shall be governed by the following principles.

Fairness

Every complaint shall be considered objectively, impartially and without prejudice.

All individuals involved shall have the opportunity to present relevant information before decisions are reached.

Respect

Every person involved in the complaints process shall be treated with dignity, courtesy and professionalism.

The Company shall promote constructive dialogue and respectful communication throughout the investigation.

Independence



Complaints shall be investigated by individuals who are free from actual or perceived conflicts of interest.

Investigators shall remain impartial throughout the process.

Confidentiality

Information relating to complaints shall be disclosed only to persons with a legitimate need to know.

Confidential information shall be protected in accordance with Company Policies and applicable legislation.

Transparency

The complaints process shall be clear, understandable and accessible.

Complainants shall receive appropriate information regarding the progress and outcome of their complaint.

Timeliness

Complaints shall be acknowledged, investigated and resolved without unnecessary delay.

Unnecessary procedural delays undermine confidence in organisational governance.

Continuous Improvement

Lessons learned from complaints shall be used to strengthen:

- governance;
- policies;
- procedures;
- education;
- research;
- customer service;
- organisational effectiveness.

The Company is committed to learning from complaints rather than merely resolving them.



5. Definition of a Complaint

A complaint is any expression of dissatisfaction concerning the services, activities, decisions, conduct or omissions of Surkovsky Centre Ltd where the complainant seeks investigation, explanation, corrective action or another appropriate resolution.

Complaints may relate to:

- quality of services;
- professional conduct;
- administrative decisions;
- customer service;
- educational activities;
- research activities;
- publications;
- communication;
- delays;
- contractual matters;
- organisational procedures.

A complaint is distinct from:

- a request for information;
- general feedback;
- suggestions for improvement;
- routine enquiries.

6. Who May Submit a Complaint

Complaints may be submitted by:

- students;
- researchers;
- lecturers;
- employees;
- contractors;
- consultants;
- volunteers;



- conference participants;
- research participants;
- clients;
- suppliers;
- partner organisations;
- members of the public.

Complaints may also be submitted by authorised representatives where appropriate written authority has been provided.

7. Matters Covered by this Procedure

This Procedure applies to complaints concerning:

- educational services;
- scientific research;
- professional training;
- conferences and academic events;
- publications;
- administrative services;
- communication failures;
- unreasonable delays;
- professional behaviour;
- equality and discrimination;
- customer service;
- breaches of Company Policies;
- organisational decisions where no alternative appeal process exists;
- failures in service delivery;
- conduct of individuals acting on behalf of Surkovsky Centre Ltd.

Complaints may concern both individual conduct and organisational practice.

8. Matters Outside the Scope of this Procedure

This Procedure does not normally apply where another formal Company Policy or legal process provides a more appropriate mechanism for resolving the matter.



Examples include:

- employee disciplinary proceedings;
- employee grievances managed under the Grievance Procedure;
- protected disclosures managed under the Whistleblowing Policy;
- allegations of academic misconduct managed under the Academic Integrity Policy;
- allegations of research misconduct managed under the Research Ethics Policy;
- appeals against academic assessment where a separate appeals procedure exists;
- contractual disputes governed by contractual dispute resolution provisions;
- matters currently subject to legal proceedings;
- complaints previously investigated unless significant new evidence becomes available.

Where a complaint is more appropriately dealt with under another Company Policy, the complainant shall be informed and, where appropriate, directed to the relevant procedure.

9. Complaint Submission

9.1 General Principle

Complaints should be submitted as soon as reasonably practicable after the event giving rise to the complaint.

Prompt reporting assists in preserving evidence, identifying relevant witnesses and facilitating a timely resolution.

Delayed complaints may still be considered where there are reasonable grounds for the delay.

9.2 Methods of Submission

Complaints may be submitted:

- by email;
- in writing;
- through an official Company complaint form;
- through an online complaints system, where available;
- by any other communication method approved by the Company.

Where exceptional circumstances exist, verbal complaints may be accepted and formally documented by the Company.

9.3 Information to be Provided



To enable an effective investigation, complainants should provide, where possible:

- full name and contact details;
- date of submission;
- date and location of the incident;
- a clear description of the complaint;
- names of individuals involved, where known;
- supporting documents or evidence;
- details of any previous attempts to resolve the matter;
- the outcome sought.

The absence of some information shall not automatically prevent a complaint from being considered where sufficient information exists to commence an investigation.

9.4 Anonymous Complaints

Anonymous complaints may be accepted where:

- the allegation appears credible;
- sufficient information is available;
- the alleged matter is serious;
- independent verification appears possible.

Anonymous complaints may, however, limit the Company's ability to investigate fully or provide feedback regarding the outcome.

9.5 Complaints Submitted by Representatives

A complaint may be submitted by an authorised representative acting on behalf of another individual.

The Company may require written evidence confirming the representative's authority before processing the complaint.

10. Complaint Assessment

10.1 Initial Assessment

Upon receipt of a complaint, the Company shall undertake an initial assessment to determine:

- whether the complaint falls within the scope of this Procedure;
- whether sufficient information has been provided;



- whether immediate action is required;
 - whether another Company Policy is more appropriate;
 - whether informal resolution may be suitable.
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10.2 Acknowledgement

The Company shall acknowledge receipt of a complaint within a reasonable period.

The acknowledgement should normally include:

- confirmation that the complaint has been received;
 - the complaint reference number;
 - confirmation that an assessment is underway;
 - details of the next stages of the process;
 - contact details for further communication.
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10.3 Early Resolution

Where appropriate, complaints should be resolved at the earliest possible stage.

Early resolution may include:

- clarification of misunderstandings;
- correction of administrative errors;
- provision of additional information;
- informal discussion;
- mediation where appropriate;
- prompt remedial action.

Early resolution shall only be used where consistent with the seriousness of the complaint.

10.4 Escalation

Where informal resolution is unsuccessful or inappropriate, the complaint shall proceed to formal investigation.

Complaints involving allegations of:

- discrimination;
- harassment;
- fraud;



- corruption;
- safeguarding concerns;
- serious misconduct;
- criminal activity;
- significant reputational risk,

shall normally proceed directly to a formal investigation.

11. Investigation Procedure

11.1 Principles of Investigation

Every investigation shall be conducted:

- fairly;
- impartially;
- independently;
- confidentially;
- objectively;
- proportionately.

The investigation shall seek to establish facts rather than assumptions.

11.2 Appointment of Investigator

The Director shall appoint an investigator possessing appropriate knowledge, experience and independence.

The investigator shall:

- have no conflict of interest;
- act impartially;
- respect confidentiality;
- conduct the investigation professionally;
- comply with Company Policies and applicable legislation.

Where necessary, the Company may appoint an external independent investigator.

11.3 Investigation Activities



The investigator may undertake any activities reasonably necessary to establish the facts, including:

- interviewing relevant individuals;
- examining documentary evidence;
- reviewing electronic records;
- analysing correspondence;
- inspecting relevant locations or facilities;
- consulting technical or professional experts;
- reviewing applicable Company Policies and Procedures.

The investigation shall remain proportionate to the complexity and seriousness of the complaint.

11.4 Rights of Individuals

Every individual who is the subject of a complaint shall have the opportunity to:

- understand the substance of the complaint;
- provide their account of events;
- submit relevant evidence;
- identify witnesses;
- comment upon significant factual findings before conclusions are reached.

The Company shall observe the principles of procedural fairness throughout the investigation.

11.5 Investigation Report

Following completion of the investigation, the investigator shall prepare a written report containing:

- a summary of the complaint;
- the scope of the investigation;
- evidence considered;
- findings of fact;
- conclusions;
- recommendations, where appropriate.

Recommendations may include:

- corrective action;



- service improvements;
 - policy revisions;
 - additional training;
 - mediation;
 - disciplinary referral;
 - referral under another Company Policy where appropriate.
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12. Complaint Resolution

12.1 General Principle

Following completion of the investigation, the Company shall determine an appropriate outcome based upon the evidence available.

Every decision shall be:

- fair;
- objective;
- proportionate;
- evidence-based;
- consistent with Company Policies;
- compliant with applicable legislation.

The purpose of complaint resolution is not only to resolve the individual complaint but also to improve organisational performance and prevent recurrence.

12.2 Possible Outcomes

Following investigation, a complaint may be:

- upheld;
- partially upheld;
- not upheld;
- resolved through informal agreement;
- resolved through mediation;
- withdrawn by the complainant.

The outcome shall be supported by documented reasons.



12.3 Corrective Actions

Where a complaint is upheld, the Company may implement one or more corrective actions, including:

- correction of administrative errors;
- formal apology;
- revision of decisions where appropriate;
- improvement of administrative processes;
- revision of Company Policies or Procedures;
- additional staff training;
- enhanced supervision;
- implementation of preventative measures;
- disciplinary action under the appropriate Company Policy;
- referral to another internal procedure.

Corrective actions shall be proportionate to the seriousness of the issues identified.

12.4 Communication of Outcome

The complainant shall normally receive written notification of the outcome.

The response shall include, where appropriate:

- a summary of the investigation;
- the findings;
- the decision reached;
- reasons supporting the decision;
- any actions taken or proposed;
- information regarding the right of appeal.

The Company may withhold confidential information where disclosure would:

- breach legal obligations;
 - infringe the rights of another individual;
 - compromise confidentiality;
 - prejudice future proceedings.
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12.5 Resolution Timescales



The Company shall seek to resolve complaints as promptly as reasonably practicable.

Where additional time is required due to:

- the complexity of the investigation;
- the availability of evidence;
- involvement of external organisations;
- legal considerations;

the complainant shall be informed of the reasons for the delay and provided with an updated expected timescale.

13. Appeals

13.1 Right of Appeal

A complainant who is dissatisfied with the outcome of a complaint may request a review where they believe:

- relevant evidence was overlooked;
- procedural errors occurred;
- the investigation was not impartial;
- new evidence has become available;
- the outcome was unreasonable based upon the evidence.

An appeal is not intended simply to repeat the original complaint.

13.2 Appeal Submission

Appeals should normally:

- be submitted in writing;
- clearly identify the grounds for appeal;
- include any supporting evidence;
- specify the outcome sought.

Appeals should normally be submitted within a reasonable period following notification of the original decision.

13.3 Appeal Review

Appeals shall be considered by a person who was not directly involved in the original investigation wherever reasonably practicable.



The appeal reviewer may:

- uphold the original decision;
- amend the decision;
- require further investigation;
- overturn the original outcome;
- recommend additional corrective actions.

The appeal decision shall normally represent the final stage of the Company's internal complaints process.

14. Confidentiality

14.1 General Principle

All complaints shall be handled confidentially.

Information shall only be shared with individuals who require access in order to:

- investigate the complaint;
- make decisions;
- provide appropriate support;
- comply with legal obligations.

14.2 Protection of Personal Information

Personal information obtained during the complaints process shall be processed in accordance with:

- UK data protection legislation;
- the Company's Data Protection Policy;
- applicable confidentiality obligations.

The Company shall take appropriate measures to prevent unauthorised disclosure.

14.3 Confidential Records

Complaint files shall be securely stored and protected against:

- unauthorised access;
- alteration;
- loss;



- destruction;
- accidental disclosure.

Access shall be restricted to authorised personnel.

14.4 Confidentiality Obligations

Individuals participating in the complaints process shall not disclose confidential information obtained during an investigation unless authorised to do so or required by law.

Unauthorised disclosure may result in disciplinary action.

15. Records Management

15.1 Record Keeping

The Company shall maintain accurate and complete records relating to complaints.

Records shall normally include:

- the complaint;
 - supporting evidence;
 - investigation notes;
 - correspondence;
 - decisions;
 - corrective actions;
 - appeal documentation where applicable.
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15.2 Retention

Complaint records shall be retained for a period consistent with:

- legal requirements;
- regulatory obligations;
- contractual commitments;
- the Company's Records Management arrangements.

Records shall be securely disposed of once retention periods expire.

15.3 Organisational Learning

Complaint records shall also be analysed periodically to identify:



- recurring issues;
- service weaknesses;
- procedural deficiencies;
- training needs;
- opportunities for organisational improvement.

The Company shall use complaint data to strengthen governance and improve service quality.

16. Responsibilities

16.1 Responsibility of the Company

Surkovsky Centre Ltd is responsible for establishing and maintaining an effective, fair and transparent complaints management system.

The Company shall:

- ensure that this Procedure is implemented effectively;
 - promote awareness of the complaints process;
 - provide appropriate training to relevant personnel;
 - allocate adequate resources for complaint handling;
 - monitor complaint outcomes;
 - use complaints to improve organisational performance;
 - promote a culture of openness, accountability and continuous improvement.
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16.2 Responsibilities of the Director

The Director has overall responsibility for the effective operation of this Procedure.

The Director shall:

- ensure compliance with this Procedure;
- appoint suitably qualified investigators where appropriate;
- ensure that complaints are handled fairly and consistently;
- approve corrective actions where necessary;
- ensure that lessons learned are incorporated into Company Policies and Procedures;
- report significant complaints where required by law or regulation.

The Director shall promote an organisational culture in which complaints are regarded as opportunities for improvement rather than criticism.



16.3 Responsibilities of Managers

Managers are responsible for:

- responding promptly to complaints within their area of responsibility;
- cooperating fully during investigations;
- implementing corrective actions;
- monitoring improvements following complaint resolution;
- supporting staff throughout the complaints process;
- promoting respectful communication.

Managers shall never discourage individuals from submitting legitimate complaints.

16.4 Responsibilities of Employees

Every employee shall:

- cooperate honestly during investigations;
- provide accurate information;
- maintain confidentiality;
- comply with Company Policies;
- assist in implementing agreed improvements;
- treat complainants respectfully.

Employees shall never knowingly provide false or misleading information during a complaints investigation.

16.5 Responsibilities of Investigators

Investigators appointed under this Procedure shall:

- act independently;
- avoid conflicts of interest;
- investigate objectively;
- maintain confidentiality;
- gather relevant evidence;
- prepare clear and evidence-based reports;
- make impartial recommendations.



Investigators shall conduct investigations with professionalism, integrity and procedural fairness.

16.6 Responsibilities of Complainants

Individuals submitting complaints are expected to:

- provide truthful information;
- cooperate during the investigation;
- submit relevant evidence where available;
- communicate respectfully;
- avoid malicious or vexatious complaints.

The submission of knowingly false or malicious complaints may itself constitute misconduct under the Company's Policies.

17. Monitoring and Review

17.1 Continuous Improvement

Surkovsky Centre Ltd is committed to continually improving its complaints management processes.

Complaint outcomes shall be reviewed regularly in order to identify:

- recurring themes;
- systemic weaknesses;
- opportunities for service improvement;
- training requirements;
- policy improvements;
- governance risks.

Lessons learned shall be incorporated into future organisational planning.

17.2 Performance Monitoring

The Company shall periodically monitor:

- the number of complaints received;
- complaint categories;
- investigation times;
- complaint outcomes;



- implementation of corrective actions;
- recurring organisational issues.

Monitoring information may be used to support strategic planning and quality assurance activities.

17.3 Review of this Procedure

This Procedure shall normally be reviewed:

- annually;
- following significant legislative changes;
- following significant organisational changes;
- following serious complaints;
- where internal audits identify improvement opportunities.

Revised versions shall replace previous editions from the date of approval.

18. Related Company Documents

This Procedure should be read together with:

- Code of Conduct
- Academic Integrity Policy
- Research Ethics Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Information Security Policy
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy
- Quality Assurance Policy
- Risk Management Policy
- Records Management Policy
- Grievance Procedure

Where another Company Policy provides a more specific process for dealing with a particular matter, that Policy shall take precedence over this Procedure.



19. Approval

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Approved by: Board of Directors

Authorised by: Director

Surkovsky Centre Ltd

Signature:

Name: Jozef SURKOVSKY

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