

Formal Complaints and Public Interests Disclosure

Policy and Procedure

1. Introduction

1.1 iPET Network is committed to delivering high-quality qualifications and apprenticeship assessment services. Constructive feedback, concerns and complaints play an important role in maintaining fairness, transparency and integrity across all awarding and apprenticeship assessment activities.

2. Purpose

2.1 The purpose of this policy is to ensure that iPET Network provides a fair, proportionate and transparent approach to handling concerns and complaints. It outlines responsibilities for Approved Centres and Training Providers/Apprenticeship Assessment Centres, describes the distinction between a formal complaint and a public interest concern, sets out how stakeholders may raise issues, and explains how iPET Network will respond and conclude matters within defined timeframes.

3. Scope

3.1 This policy may be used by Learners, Apprentices, personnel working within Approved Centres and Training Providers, Assessors, Internal Quality Assurers, Tutors, employers, End-point Assessment (EPA) staff, and any other stakeholder who wishes to raise a concern, a formal complaint or a public interest concern relating to iPET Network qualifications or services. It may also be used by iPET Network personnel responsible for reviewing formal complaints and public interest disclosures.

3.2 This policy covers:

- Informal concerns and feedback relating to iPET Network's Awarding Organisation (AO) and EPAO services.
- Formal complaints about iPET Network or the delivery of iPET Network qualifications by Approved Centres or delivery of apprenticeship assessments.

- Public interest concerns relating to malpractice, maladministration, fraud, safety risks, non-compliance or any issue that may compromise Learner or Apprentice welfare, qualification validity or assessment integrity.
- Complaints or concerns raised via regulators or external bodies.

3.3 The following fall outside the scope of this policy:

- Assessment decisions, which must follow the iPET Network's **Appeals Policy**.
- Internal employee whistleblowing within iPET Network.
- Employment disputes within Approved Centres or Training Providers.
- Complaints relating to apprenticeship training or the wider apprenticeship programme are not within scope. iPET Network can only consider complaints that relate specifically to the assessment activities it delivers as an End-point Assessment Organisation/Apprenticeship Assessment Organisation (EPAO). Any concerns about apprenticeship training delivery, coaching, on-programme learning, funding or employment matters must be raised with the relevant Training Provider or employer or escalated to Skills England.

4. Definitions

- 4.1 A **Formal Complaint** is an expression of dissatisfaction about iPET Network or the delivery of its qualifications or EPAs, raised where the complainant seeks a personal remedy or resolution. Individuals are encouraged to outline the outcome they are seeking.
- 4.2 A **Public Interest Concern** is a disclosure about wrongdoing, risk or non-compliance that may harm Learners or Apprentices, compromise assessment integrity or constitute malpractice or maladministration. These disclosures are raised for the protection of others rather than for personal remedy.
- 4.3 A **Complainant** is the person or party raising the complaint, and for the purposes of this policy, a public interest concern.
- 4.4 **Malpractice** refers to intentional wrongdoing or serious misconduct that compromises the integrity of qualifications or assessments.

- 4.5 **Maladministration** refers to errors, poor practice or procedural failures that may negatively impact Learners, Apprentices, qualifications and assessments.
- 4.6 **Approved Centre** refers to an organisation that has been formally approved by iPET Network to deliver, assess and claim certification for specified qualifications.
- 4.7 **Training Provider**, for the purposes of this policy, refers to an organisation approved to deliver aspects of apprenticeship training and will contract iPET Network's End-point Assessment/Apprentice Assessment services. The Training Provider may also be approved as an Assessment Centre for Apprenticeship Assessments.

5. Informal Concerns and Feedback

- 5.1 iPET Network encourages individuals to raise informal concerns or provide feedback at the earliest opportunity. Early communication helps address matters quickly and constructively.
- 5.2 Informal concerns can be submitted through iPET Network's contact form at <https://www.ipetnetwork.co.uk/contact-us/> and will be reviewed by the appropriate department.
- 5.3 Apprenticeship Training Providers can contact the Apprenticeship Assessment team at epao@ipetnetwork.co.uk
- 5.4 Approved Centres can send general centre and delivery queries to the External Quality Assurance team at ega@ipetnetwork.co.uk.
- 5.5 General enquiry channels may resolve queries and concerns promptly without the need for a formal complaint. Where the matter cannot be resolved informally, individuals will be advised to submit a formal complaint.

6. Contact From Regulators About Complaints

- 6.1 iPET Network recognises its regulatory obligation to cooperate fully with qualification regulators, including Ofqual, CCEA Regulation and Qualifications Wales. In accordance with the General Conditions of Recognition, iPET Network will provide timely, accurate and complete information to regulators when they contact the

organisation regarding complaints, concerns or intelligence received directly by them.

6.2 Where a regulator initiates contact relating to a complaint about iPET Network's services, processes or decisions, iPET Network will respond promptly and transparently, supplying relevant evidence, documentation or clarification as required.

7. Reporting of Adverse Effects and Potential Adverse Effects (Event Notification)

7.1 iPET Network is required under Condition B3 of the General Conditions of Recognition to notify the appropriate regulator promptly when it has cause to believe that any event has occurred, or is likely to occur, which could have an Adverse Effect. This includes events identified through complaints, internal processes, Centre reports or any other credible source.

7.2 Where a complaint suggests the possibility of an Adverse Effect, such as prejudice to Learners, risks to assessment integrity, errors in assessment materials, or issues likely to undermine public confidence, iPET Network will assess the information and notify the relevant regulator if required.

7.3 If a complainant requests anonymity, iPET Network will take reasonable steps to protect their identity. However, such requests cannot prevent the organisation from fulfilling its regulatory obligation to report an actual or potential Adverse Effect to the regulator. Only information necessary to meet regulatory expectations will be disclosed, and personal details will be withheld wherever possible.

8. Responsibilities of Approved Centres and Training Providers

8.1 Approved Centres and Training Providers must maintain a clear internal complaints procedure accessible to all stakeholders.

8.2 Learners and Apprentices must be informed of the Approved Centre/ Training Provider's procedure at induction and throughout their programme.

- 8.3 Approved Centres and Training Providers must ensure that Tutors, Assessors, Internal Quality Assurers and administrative staff are trained in, and familiar with, the establishment's procedure and iPET Network's wider requirements. They must ensure that concerns and complaints are handled fairly, that appropriate evidence is gathered, and that outcomes are communicated clearly.
- 8.4 Approved Centres and Training Providers must cooperate with iPET Network during investigations, provide documentation when requested, and implement corrective actions or sanctions where required.

9. Submitting a Formal Complaint to iPET Network

- 9.1 Formal complaints must be submitted via the Complaints and Public Interest Disclosure web form which is located on the iPET Network website under Complaints. iPET Network will acknowledge receipt within five working days.
- 9.2 iPET Network will provide reasonable adjustments to support individuals raising concerns, formal complaints or public interest concerns. This includes providing alternative communication methods to submit a complaint or public interest disclosure and will supply information in alternative formats when required.
- 9.3 Where the complainant is a Learner, the Learner should normally raise their complaint with their Approved Centre in the first instance, unless there is a serious or immediate risk, a conflict of interest, a reasonable fear of retaliation, or the matter relates directly to iPET Network's services.
- 9.4 Where the complainant is an Apprentice and wishes to complain about an Apprenticeship Assessment conducted by their Training Provider, the Apprentice should normally raise their complaint with their Training Provider in the first instance, unless there is a serious or immediate risk, a conflict of interest, a reasonable fear of retaliation, or the matter relates directly to iPET Network's services.
- 9.5 If a Learner is dissatisfied with the Centre's complaint outcome, after the complaints process has been completed including any appeal or review processes, they may escalate the matter to iPET Network as a new formal complaint. iPET Network will consider whether the Centre/Training Provider followed its procedures correctly,

whether it met its obligations as an Approved Centre/Training Provider approved to assess apprenticeship assessments, and whether the issues raised indicate potential quality, compliance, malpractice or maladministration concerns. iPET Network will not re-investigate the same issues solely to provide a second opinion.

10. Timeframes for Submitting a Formal Complaint or Public Interest

Disclosure

10.1 To enable iPET Network to investigate concerns thoroughly, ensure accuracy, and mitigate any potential or actual Adverse Effect, complainants are encouraged to raise issues as early as possible.

10.2 Complaints will not normally be considered if:

- More than 3 months have passed since the event being complained about, or
 - More than 3 months have passed since the outcome of the complaint issued by an Approved Centre or Training Provider (including any appeals or reviews), or
 - More than 3 months have passed since new, relevant evidence came to light.
- iPET Network will apply the latest of the above three dates where more than one is relevant.

10.3 Complaints or disclosures submitted outside these timeframes may still be considered at iPET Network's discretion where there is a valid reason for the delay, such as exceptional personal circumstances, safeguarding concerns, or situations where the complainant could not reasonably have known the information sooner.

11. iPET Network Formal Complaints Procedure

11.1 Within ten working days of acknowledgement (see Section 9), iPET Network will conduct an initial review to determine the appropriate route and scope for investigation and may request further information. Formal complaints will be investigated by an impartial representative who was not involved with the matter under complaint. iPET Network will begin the investigation as promptly as possible and will progress it at the earliest opportunity.

- 11.2 The investigation may involve reviewing documentation, contacting the complainant or Approved Centre or Training Provider (where the complaint is about another body and not directly regarding iPET Network), and gathering evidence. iPET Network will undertake these steps as quickly as practicably possible while ensuring that the investigation remains fair and thorough.
- 11.3 iPET Network aims to provide a written outcome within twenty working days of confirming the scope of the investigation. The outcome will summarise findings, explain conclusions and detail any actions taken or required. iPET Network will always seek to issue outcomes as soon as possible and will not wait until the twentieth working day if an earlier resolution is achievable.
- 11.4 Where it is not possible to complete the investigation within twenty working days, this will be explained to the complainant and updates will be provided at appropriate intervals, normally every ten working days.

12. Complaint Review (iPET Network)

- 12.1 Where a complainant is dissatisfied with the outcome issued by iPET Network, they may request a Complaint Review. This will be undertaken by a senior manager who has had no prior involvement in the investigation or in any aspect of the matter under complaint.
- 12.2 The scope of the complaint review is to assess whether the complaint was managed appropriately, whether relevant procedures were followed, and whether the outcome reached was reasonable. The review is not a fresh investigation, but it may direct that the matter be reinvestigated if procedural deficiencies are identified which could reasonably have affected the complaint outcome.
- 12.3 Requests must be submitted within ten working days of receiving the outcome. The outcome response will detail the contact information and process to submit a complaint review request.
- 12.4 iPET Network will acknowledge this request within five working days and aim to provide a complaint review outcome within twenty working days.

12.5 Where it is not possible to complete the investigation within twenty working days, this will be explained to the complainant and updates will be provided at appropriate intervals, normally every ten working days.

12.6 This is the final stage of iPET Network's complaints process.

13. Public-Interest Concerns Procedure

13.1 An initial triage will be completed to assess urgency, otherwise the disclosure will be acknowledged within five working days where contact details have been provided.

13.2 Where contact details have been provided and within ten working days of acknowledgement, the scope, handling requirements and level of updates and outcome will be outlined to the complainant.

13.3 Concerns may be investigated by iPET Network or directed through the Malpractice and Maladministration Procedure where appropriate.

13.4 It might not be appropriate to provide updates or outcomes, but where it is outcomes will only be shared at high-level to protect confidentiality and the integrity of the process.

13.5 Individuals should feel able to raise public interest concerns without fear of disadvantage, and retaliation against those who raise concerns in good faith is prohibited.

13.6 Some Approved Centre and Training Provider personnel may benefit from legal protections when making qualifying public interest disclosures. Learners may not have the same legal protections but will be supported appropriately under this policy.

14. Crossover with Malpractice and Maladministration Investigations

14.1 Where a complaint or public interest concern indicates potential malpractice or maladministration, iPET Network may reclassify the matter under the Malpractice and Maladministration Policy. Complaint handling may be paused while malpractice investigations proceed or, where appropriate, both routes may operate in parallel.

14.2 Investigative activities may include extraordinary quality assurance reviews, interviews, sampling, documentation checks or commissioning independent investigations. Costs for extraordinary investigations may be charged in accordance with the Terms and Conditions and Agreements between parties.

14.3 Actions resulting from malpractice investigations may include corrective measures, conditions, increased monitoring, sanctions, temporary suspension or withdrawal of approval.

15. Escalation to Regulators

15.1 Learners and Apprentices must complete all stages of iPET Network's internal complaints procedure before escalating their concerns to the appropriate qualification regulator (Ofqual, CCEA Regulation, or Qualifications Wales). Regulators normally require that any complaint is submitted within 12 months of the event being complained about, and complaints submitted after this period may not be accepted.

15.2 Learners and Apprentices should escalate their concerns only when they believe iPET Network has not followed its published procedures, has acted improperly, or has failed to meet regulatory requirements.

16. Data Protection Complaints

16.1 A data protection complaint is any expression of dissatisfaction where an individual believes that iPET Network has not handled their personal data in accordance with applicable data protection law.

16.2 This may include concerns about how personal data has been:

- collected, used, stored, retained, or kept accurate
- protected or secured (including concerns following a data breach)
- handled in response to a data subject rights request (e.g. a subject access request)

16.3 This section applies to complaints received from any individual whose personal data is processed by iPET Network, including Learners, Apprentices, customers, iPET Network personnel, Approved Centres, website users and other stakeholders.

16.4 Where a complaint includes both data protection and non-data protection concerns, it will be treated as a mixed complaint. The data protection aspects will be handled in accordance with this section.

16.5 iPET Network encourages individuals to raise data protection complaints using the Formal Complaints and Public Interests Disclosure form available on its website, as this approach ensures that all necessary information is captured at the outset and helps to minimise delays caused by the need for further clarification.

16.6 However, in line with Information Commissioner's Office (ICO) expectations, iPET Network will also accept data protection complaints submitted through other reasonable channels, including email, post, or other standard contact methods, where individuals choose not to use the website form.

16.7 iPET Network does not monitor or manage data protection complaints submitted via social media channels and these are not considered a formal or secure route for raising such complaints. Individuals are therefore encouraged to use the website form or other recognised contact methods outlined above. However, where a data protection complaint is received via social media and is reasonably identifiable as such, iPET Network will take appropriate steps to respond in line with its obligations under data protection law.

16.8 Data protection complaints will be handled in line with iPET Network's overall complaints procedure, with the following specific requirements:

- iPET Network will acknowledge receipt of the complaint within 30 days
- iPET Network will investigate the complaint without undue delay, making appropriate enquiries
- iPET Network will keep the individual informed of progress where appropriate
- iPET Network will communicate the outcome of the complaint without undue delay

16.9 Where a data protection complaint is upheld, iPET Network will take appropriate corrective action. This may include improving internal processes, correcting or updating personal data, or implementing measures to prevent recurrence.

16.10 If an individual is not satisfied with the outcome of the complaint, they have the right to raise their concern with the Information Commissioner's Office (ICO), which is the UK's independent regulator for data protection.

17. Confidentiality and Data Handling

17.1 iPET Network handles all information sensitively and in accordance with data protection legislation. Information is shared only on a need-to-know basis and only for the purpose of managing the concern, formal complaint or public interest concern. Further information on iPET Network handle personal data can be found in iPET Network's Privacy Notice at <https://www.ipetnetwork.co.uk/privacy-notice/>

17.2 Anonymous concerns may be submitted, and iPET Network will consider them where there is sufficient information to enable an investigation. Anonymous concerns are not automatically treated as public interest concerns. However, raising an issue anonymously may limit iPET Network's ability to investigate fully or to provide any meaningful outcome. In particular:

- iPET Network may be unable to contact the individual to gather further information or clarify details.
- Some allegations cannot be progressed without corroboration, which may not be available if the reporter is anonymous.
- Anonymous submissions cannot usually lead to a personal remedy, as iPET Network cannot verify the individual's identity, circumstances or consent.
- If the matter relates to dissatisfaction with Approved Centre service or personal impact, anonymity may prevent iPET Network from addressing the issue specifically or providing personalised feedback.

17.3 Individuals may provide their identity to iPET Network but request that iPET Network does not share their details with an Approved Centre or Training Provider. iPET Network will respect this request where possible, however the reporter must understand the following limitations:

- iPET Network may be unable to progress certain types of concerns, especially Formal Complaints seeking a personal remedy, without disclosing information to the centre responsible.
- iPET Network may be restricted in the nature of any investigation it can undertake and may not be able to fully resolve the issue.
- Where iPET Network cannot disclose relevant details, the Approved Centre or Training Provider may be unable to respond, correct or comment on the matter, which may limit the action iPET Network is able to take.
- Personal remedies, including service corrections, individual follow-up or tailored responses may not be possible without identifying information being shared.
- In cases where non-disclosure limits the investigation, iPET Network will explain what actions can and cannot be taken so that the individual understands the constraints.

17.4 Personal information will be processed lawfully, fairly and securely. Only information necessary for the investigation will be shared, and only with those involved in reviewing or resolving the matter.

17.5 The identity of individuals raising public interest concerns will be protected wherever possible.

17.6 Retaliation against any individual who raises a concern in good faith will not be tolerated.

17.7 All records will be retained in accordance with iPET Network's data retention schedule, which is three years from the completion of the Formal Complaints or Public Interest Disclosure process. Anonymous outcomes, learnings and quality improvement reports may be retained for longer.

18. Monitoring

18.1 Themes and trends arising from concerns, complaints and public interest matters will be reviewed regularly to inform quality assurance, risk management and continuous improvement.

19. Policy Review

19.1 This policy will be reviewed annually or sooner if required by regulatory changes, feedback, or operational learning.

Contact Information



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Version Control

| Date of Amendment | Version Number | Amendments |
|-------------------|----------------|--|
| 20/03/2026 | 1.0 | Amalgamated policies P4, P10, EPA11, EPA31 Enhanced clarity regarding Public Interest Disclosures Enhanced clarity regarding Complaints Review if dissatisfied with outcome Enhanced clarity regarding escalation Timeframes updated to provide transparency |
| 12/06/2026 | 1.1 | Added reference to Data Protection Complaints Policy in line with new ICO legislation |