

Complaints Policy and Procedures

Introduction

eQuality Solutions Group Ltd and all its subsidiaries are committed to upholding our pledge to this policy, ensuring that every action we take reflects our core values of Equity, Pride, Purpose, Integrity and Courage. This policy is more than just a statement, it is a reflection of who we are and what we stand for, guiding us toward meaningful impact and lasting change.

Policy Statement

eQuality Solutions Group Limited and all of its subsidiaries (collectively known as '**the Group**' in this policy and procedures document) are committed to providing a good standard of quality services to all users.

Users includes the Group's service users (such as students), website visitors, clients, suppliers, agencies and organisations that it works with. In addition, **users also include** any contracted individual such as salaried employee, zero hours worker, self-employed sole trader and personal service company (PSC) employee.

The Group is committed to take seriously any concern or complaint (stated or inferred) and will action it promptly, for resolution as quickly as possible.

It recognises that all users have the right to raise concerns or complaints about the Group's various services and will ensure that they have access to clear information on how to voice complaints and concerns.

The Group keeps a register of all complaints, which is reviewed regularly by the Executive Management Team and the Group Board.

It is also committed to ensuring that the Policy and Procedures are part of the process for monitoring the quality and effectiveness of all its services (internal or external).

All employees have read and understand this Policy and Procedures.

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The failure of any employee to follow this Policy and Procedures may lead to disciplinary action that could, ultimately lead to dismissal.

To ensure no confusion the Group has adopted the following as the definition of a complaint:

“Any expression of dissatisfaction or objection to a situation, product, service or behaviour that is perceived as unfair, unacceptable, or below normal standards”.

Objectives

The Group strives for exacting standards in service delivery and welcomes feedback from all users, about any aspect of its services. This is invaluable in helping to evaluate and improve.

The Policy objectives are to:

- Ensure that users know how to make a complaint, and how it will be handled;
- Ensure that complaints are dealt with consistently, fairly and sensitively, within clear timeframes;
- Provide users a fair and effective way to complain about any aspect of the Group;
- Ensure that complaints are monitored and reviewed to bring about improvements in services.

The Group is committed to:

- Listening carefully to complaints, and treating them all confidentially, where possible;
- Recording, storing, and managing all complaints accurately and in line with the Group’s Data Protection Policy and Data Retention and Deletion Policy;
- Investigating all complaints fully, objectively, and within stated timeframes;

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- Notifying the complainant of the results of the investigation, and any right of appeal;
- Informing the complainant of any action that will be implemented in order to ensure that there is minimal risk of the issue, that originally caused the need to complain, being repeated;
- Reporting monthly to the Executive Management Team and quarterly to the Group Board on the complaints received, the outcomes, and any action taken as a result.

The Complaints Procedures

The Group aims to settle the majority of complaints quickly and satisfactorily for all parties involved. This may be by way of an apology or by an acceptable explanation or resolution.

There are three stages to the Complaints Procedures:

- 1) Stage 1: The Complaint
- 2) Stage 2: The Investigation
- 3) Stage 3: Appeal

Further information on each stage of the procedures can be found in the Appendix to this Policy and Procedures document.

Further Information

The central point of contact is the Group's Compliance and Data Protection Manager (CDPM), who can be contacted using this email address: complaints@e-q-s.com

Monitoring and Review

This policy is reviewed annually and, if necessary, amended to ensure that it remains effective.

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This Policy and attached Procedures were created in March 2025 and will be reviewed again in March 2026, or sooner depending on changes to UK Laws, regulations and guidance.

Approval

Joy Saini

Group Head of IT

Signature: 

Date: 06/03/2025

APPENDIX:

The Group's Complaints Procedures

The Group aims to settle the majority of complaints quickly and satisfactorily for all parties involved. This may be by way of an apology or by an acceptable explanation.

There are three stages to the Complaints Procedure

- 1) Stage 1: The Complaint
- 2) Stage 2: The Investigation
- 3) Stage 3: Appeal

Stage 1: The Complaint

- A complaint can be made in writing (email or letter), or it can be verbal if the complainant makes an expression of dissatisfaction directly to a

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member of staff within the Group (or via anyone working on the Group's behalf).

- Initially, the Group would encourage complainants to discuss their concerns with the manager of the business area that provided the service to them. If their concerns are not resolved at this stage then a formal complaint will be opened and all detail passed to the Group's CDPM.
- Making the issues formally into a complaint can be instigated by the original complainant or by the manager of the business area.
- Complainants can bypass the business area completely if they wish by emailing the CDPM direct at Complaints@e-q-s.com or writing to:

The Compliance and Data Protection Manager, Equality Solutions Group Limited, 9 Apollo Court, Koppers Way Monkton Business Park South, Hebburn, NE31 2ES.

- Ideally the complaint should provide contact details for the complainant (such as address, email address, telephone number etc.) the nature of the complaint, the date the issue occurred, and how they feel it should be resolved.
- Complaints relating to the CDPM will be handled independently by the Group Head of IT.
- Complaints relating to Executive Management Team members will be handled independently by the CEO and/or Managing Director.
- Complaints relating to the CEO and/or Managing Director or other Board members will be handled by the independent Non-Executive Director(s) appointed by the Board.
- On receipt each complaint will be allocated a reference number and logged on a central complaints log. Complainants will normally receive an

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acknowledgement within 3 working days of receipt of the complaint by any business area.

- As no area of the Group records telephone conversations, it encourages complainants to always use email, wherever possible, to ensure that they have an accurate record of discussions.

Stage 2 – Investigation

- All complaints will be dealt with initially by the Group's CDPM, with assistance from the manager of the business area that the complaint is about (unless the complaint is regarding the manager). If the Group's CDPM needs to discuss the complaint with the complainant, this would normally happen within seven working days of receipt of the complaint, and this will mainly be by email to ensure accurate records are kept.
- Complaints will be managed by the Group's CDPM where:
 - The complainant has asked for an immediate referral to the CDPM;
 - The complaint is in respect of any personal data issue;
 - There is a conflict of interest between a complainant and an employee, contractor or director;
 - The issues are of a complex nature where local resolution of a concern would be inappropriate;
 - The complaint represents a high or serious risk to the Group;
 - The complainant is identified as being vulnerable;
 - There has been media contact or attention;
 - The issues do, or may, affect many more people (whether identified or not).

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- Complaints will always be fully investigated, and written response (by email) provided to the complainant within ten working days of receipt by the CDPM.
- The response will confirm any recommendations or remedies being made (such as a review of Policies, staff development, training programmes, or appropriate improvements to services).
- Where the complaint is upheld a full apology will also be offered.
- There will be occasions where an investigation will take longer, particularly if the complaint is complex. If this is the case a holding communication will be sent after 10 working days and a final date will be estimated as to when a conclusion might be reached.
- If the complainant remains dissatisfied with the outcome of Stage 2 they have the right of appeal, within 14 working days of the date of the outcome of Stage 2.

Stage 3 – Appeal

- If the complaint cannot be resolved satisfactorily at Stage 2, or if the CDPM considers the complaint to be of a serious nature, or concerns a senior manager, then it will be referred to the CEO and Managing Director.
- The CEO and Managing Director will have the complaint acknowledged within three working days of it being referred under Stage 3.
- The CEO and Managing Director will have the Stage 2 investigation reviewed by a senior manager from a business area unconnected to that where the complaint originated. The senior manager will recommend one of the following actions within 10 working days of the complaint reaching Stage 3:
 - Uphold the action taken at Stage 2;

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- Make changes to the Stage 2 recommendations or actions.
- The complainant will be informed in writing (by email) from, or on behalf of, the CEO and Managing Director, of the outcome of Stage 2, with the decision made about the complaint at Stage 3 being final.

Anonymous Complaints

Complaints that are received anonymously will be recorded and considered, but action may be limited if further information is required to ensure a full and fair investigation.

Data Protection

To process a complaint the Group will hold personal data about the complainant, which the individual will provide, and which other people may provide during the complaint investigation. The Group will hold the data securely and only use it to address the complaint.

The identity of the complainant will only be known to those who need to consider the complaint and will not be revealed to other people or made public.

However, it may not always be possible to preserve confidentiality in some circumstances, for example where relevant legislation applies, or allegations are made which involve the conduct of third parties.

The Group will normally destroy complaint records in a secure manner six years after the complaint has been closed.

Monitoring

Complaints are a valuable tool which, along with data provided by satisfaction surveys, stakeholder, service user, and focus group feedback, will allow the Group to understand the quality of the services provided. They provide a useful source of information about how individuals see the services and how the Group services them. To ensure that it learns from complaints the following data will be collected:

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- Name and address of complainant;
- Name of person managing the complaint on behalf of the Group;
- Nature of the complaint;
- Date of the complaint and date and content of the response;
- Action(s) taken and recommendations made in response to the complaint, and lessons learnt.

The Executive Management Team and the Group Board will consider complaints information regularly, and where appropriate, use it to improve and develop the Group's services.