

1 Policy Statement

The purpose of this policy is to provide a clear statement of intent with regards to the assessment, handling, and investigation of all complaints and expressions of dissatisfaction received by Lifetime. Lifetime's complaint handling policy and procedure has been created to meet the standards and requirements of the relevant regulating bodies.

The aim of this policy is to ensure that all complaints, regardless of how they are received (verbal or written, and via any media), are documented and handled in a consistent and regulated manner and that further incidents are mitigated against and prevented.

2 Purpose

Lifetime is committed to delivering a fair, open, and clear process for complaints and to ensure a satisfactory outcome for anyone who raises a complaint. We provide staff training in our internal complaint handling procedures and support staff in how to handle complaint situations in a face-to-face, written and/or telephone environment, where role-relevant.

This policy sets out our intent and objectives for how we handle complaints, from offering a clear and approachable system for individuals to complain, through to conducting root cause analysis on all complaints received, to identify the reason(s) for the subject(s) of the complaint arising and to implement measures to prevent reoccurrences where applicable.

3 Scope

The policy relates to any expression of dissatisfaction or complaint with Lifetime, regarding a service (or lack of service) provided or a member of staff (meaning permanent, fixed-term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with Lifetime in the UK or overseas).

This policy has been created to ensure that staff dealing with the area that this policy relates to, do so in accordance with legal, regulatory, contractual, and business expectations and requirements.



4 Objectives

Lifetime's objectives are laid out below regarding handling of all complaints.

4.1 HIGH-PRIORITY COMPLAINT

For the purposes of this policy, a "high-priority complaint" is defined by the handling agent whereby the subject of the complaint requires urgent resolution. This could include, but is not limited to, situations where there is a safeguarding concern, where there have been allegations of misconduct or inappropriate behaviour, or where there is a risk to a learner continuing on programme. The individual may, but does not have to, formally address their communication as an official/urgent/formal complaint for Lifetime Training to treat the incident as a high-priority complaint and to follow the related procedures.

Lifetime's objectives for internal handling of high-priority complaints are: -

- Complaints received into the business will be passed to the Customer Support (CS) Team in order for a complaint handler and case reference number to be assigned;
- Complaints will be investigated and a response provided within a maximum of five working days from the initial receipt of the complaint;
- Where necessary to contact persons internally as part of this investigation, the initial contact will be made by telephone with this person, by the handler, within one working day of the receipt of the complaint;
- Updates on the progress of the complaint will be provided to the complainant every 48 hours maximum;
- Complaint procedures and forms will be available via the Lifetime website as well as on request;
- All complaints will be investigated by a member of the CS Team who will provide the final response to the complainant. These responses will always be provided in writing;
- All complaint records will be used to revise company procedures and to improve communication and business practices where applicable;
- All complaints will be reported monthly to the Quality Director for senior management to identify trends and mitigate recurrence or escalation.

4.2 COMPLAINT

With the addition of the high-priority complaint to this policy, there will be no reduction in, or change to, the level of service accorded all other complaints. For the purposes of this policy, a "complaint" is defined as any expression of dissatisfaction where it is clear the individual expects us to identify the cause of the problem and provide a formal resolution. The individual may, but does not have to, formally address their communication as an official/formal complaint for Lifetime Training to treat the incident as a complaint and to follow the related procedures.

Lifetime's objectives for internal complaint handling are: -

- Complaints received into the business will be passed to the Customer Support (CS) Team in order for a complaint handler and case reference number to be assigned;
- Complaints will be investigated and a response provided within a maximum of ten working days from



the initial receipt of the complaint;

- Complaint procedures and forms will be available via the Lifetime website as well as on request;
- All complaints will be investigated by a member of the CS Team who will provide the final response to the complainant. These responses will always be provided in writing;
- All complaint records will be used to revise company procedures and to improve communication and business practices where applicable;
- All complaints will be reported monthly to the Quality Director for senior management to identify trends and mitigate reoccurrence or escalation.

4.3 Handling Process

Lifetime's objectives for the complaint handling process are: -

- To provide a fair complaints procedure which is clear and easy to use for anyone wishing to make a complaint;
- To ensure that our complaints procedure is fully accessible so that people know how to contact us to make a complaint;
- To ensure everyone at Lifetime understands the definition of, and difference between, a high-priority complaint and complaint;
- To make sure everyone at Lifetime knows what to do if a high-priority complaint or complaint is received;
- To gather and record information which helps us to improve what we do;
- To make sure all complaints are investigated fairly and in a timely way.



5 Procedures & Guidelines

5.1 RAISING A COMPLAINT

Individuals who request Lifetime's complaint handling procedure will be provided a copy of the procedure and online form and will be asked to raise their complaint as soon as possible after the incident.

Complaints can be raised in any format or media (e-mail, letter, phone etc) with no time limit from the time that the subject of the complaint (event/incident/etc) occurred.

5.2 HOW TO RAISE A COMPLAINT

Individuals can make a complaint in whichever way is easiest for them; for example by telephone, e-mail, or letter. There is also a simple online form which is located on Lifetime's website: https://lifetimetraining.co.uk/about-us/policies/complaints/. Or they can e-mail: support@lifetimetraining.co.uk/about-us/policies/complaints/.

People who would prefer to make a verbal complaint can telephone the CS Team on 0117 304 8558. Lines are open 09.00-17.30 Monday to Friday (excluding bank holidays and between Christmas and New Year).

Those who would prefer to submit a complaint in writing should send it to: Customer Support Complaints, Lifetime, Clifton Heights, Triangle West, Bristol, BS8 1EJ.

5.3 RESPONDING TO A COMPLAINT

Where a complaint has been received, a written acknowledgement must be sent to the individual within three working days (one working day for high-priority complaints). The response should detail the complaint handling procedure, provide a copy of this policy and provide approximate timelines and expectations for the investigation and future responses.

5.4 INVESTIGATING THE COMPLAINT

A CS Team member will be assigned the role of investigating complaints and will gather all necessary documents, recordings, and information to make an independent review of the incident.

If internal interviews are to be conducted, a note taker will be present alongside the investigator and interviewee and a copy of the interview notes will be written up and signed by the interviewer and interviewee prior to them being added to the complaint history.

Investigations must utilise all the facts and any previous, related information to produce an unbiased outcome and an expected course of action. A complaint reference should be assigned and all documents relevant to the complaint should have the reference written on them for continuity. The reference will also be added to the Complaints Register so that complaint and documents can be audited and traced back in the future.

Lifetime reserves the right to pass on relevant information to a third party where there is a valid legal reason to do so and any request for information will be investigated prior to any personal information being passed on.



5.5 DECISION LETTER (FINAL RESPONSE)

After the complaint has been investigated in full and an outcome and action decision has been arrived at the investigator will draft a final response letter to the complainant with both their findings and their decision on any action to be taken.

The final response must be sent within ten working days of the initial complaint being raised (five working days for a high-priority complaint) and should also contain the below information (section 7) should the complainant be unhappy with the decision received.

6 Complaint Recording

All complaints are recorded on CRM in the first instance, which generates a case reference. The fields within CRM consist of the below information and should be audited on a frequent basis to ensure that incidents are not being repeated and improvements are being made.

- Date
- Priority level
- Nature of Complaint
- Department(s) Involved
- Complaint Reference
- Lead Investigator
- Root Cause and Action Taken
- Decision Letter Sent (Y/N)
- Date Complaint Resolved/Closed

All complaint records must be kept and be available for three years following resolution.



7 Escalating a Complaint

In the event you are not fully satisfied with the outcome of your complaint, you should first raise an appeal, which can be made by e-mail, letter or phone (to the same details as the initial complaint).

The Customer Support Manager will receive this complaint and compile all necessary documents (including, but not limited to, the original complaint, the original investigation notes, the initial complaint response and the contents of the appeal) and this will be sent to an independent senior manager/director, who will assess the appeal and whose decision will be final.

Where an appeal comes from, or is made in relation to, a learner, this senior person will be the Operations Director for the sector relevant to the programme the learner was most recently engaged on. Otherwise, or if this person is not available at that time, the appeal will be raised to either Lifetime's Quality and Curriculum Director, or its Operations Delivery Director.

This person will assess all the evidence provided and judge whether the original complaint response was correct. The outcome of this will be considered final within Lifetime, and the result of the appeal cannot itself be appealed.

However, if you are not satisfied with the outcome of your appeal, you can escalate your complaint to the relevant Governing Body.

7.1 AWARDING ORGANISATION

If you are a learner and wish to make an appeal against an assessment decision, please refer to the Learner Appeal policy provided at the start of your course.

7.2 FUNDING AGENCY

7.2.1 EDUCATION AND SKILLS FUNDING AGENCY

If you are an Apprentice or studying a work-based learning programme based in England who receives funding from the Education and Skills Funding Agency (ESFA) please follow the complaints procedure as set by the governing body.

https://www.gov.uk/government/organisations/skills-funding-agency/about/complaints-procedure

7.2.2 SKILLS DEVELOPMENT SCOTLAND

If you are an Apprentice or work-based learner based in Scotland who receives funding from Skills Development Scotland (SDS) please follow the complaints procedure as set by the governing body.

https://www.skillsdevelopmentscotland.co.uk/about/policies/complaints/

Candidates on regulated qualifications also have the right to complain to SQA Accreditation, Ofqual, or Qualifications Wales once they have exhausted their centre's complaints procedure and the SQA Awarding Body's complaints procedure.



8. Responsibilities

Lifetime will ensure that staff are provided with the time, resources and support to learn, understand and deal with customer complaints and that full training will be provided for new and existing employees on the complaint handling policy, procedures and expectations, where applicable to their role.

The staff member handling the complaint will be appointed the role of overseeing the investigation and recording of all customer complaints and is responsible for regular auditing of the complaints log to ensure mitigating actions and improvements are put into place where possible.

9. Associated Policies

Lifetime Complaint Handling Policy & Procedure Regulated

We also have an external whistleblowing service.

If you wish to alert our third-party whistleblowing company to anything please contact Ethics Point - Navex Global:-

- o via telephone (0800 069 8209)
- o via e-mail at <u>lifetimetraining@ethicspoint.com</u>
- o online via http://lifetimetraining.ethicspoint.com/.

David Smith, Chief Executive Officer

Lifetime Training Group Limited 31/01/2025

Date for next Policy review 30/01/2026