

# COMPLAINTS POLICY & PROCEDURE

*PMQ Regulated Qualifications*

*Apprenticeship Assessment Qualifications (AAQ)*

## Purpose

1. This policy outlines how you can raise a complaint or provide feedback about our processes, employees or others carrying out work for Propertymark Qualifications (PMQ). This policy explains how PMQ will handle your complaint and what to expect during the process.

## Scope

2. This policy forms part of PMQ's internal control and governance arrangements.
3. The PMQ Governing Body is committed to ensuring that effective policies operate throughout Propertymark Qualifications.
4. This policy is not contractual but is intended as a statement of current PMQ strategy, and its commitment to operate a fair procedure, considering statutory and other guidelines. PMQ therefore reserves the right to amend this policy and procedure, as necessary, to meet any changing requirements.
5. This policy and associated procedure sets out good practice in the management of complaints. The documents provide all parties with a set of guidelines which are applied fairly and consistently.
6. At PMQ we endeavour to provide high quality services to our customers, however, PMQ recognise that on occasion, despite PMQ's best efforts, mistakes can be made. By welcoming feedback through PMQ's Complaints Procedure, PMQ can try to remedy situations that have gone wrong and continue to improve our service design and delivery, as well as learn from examples of positive feedback about things that have been done well, which helps PMQ to develop our processes and practices.
7. PMQ strives to empower employees to act decisively to resolve complaints. Learning opportunities are available for all PMQ employees and representatives by way of additional training and workshops on our customer care processes, where required.
8. Whilst PMQ welcomes feedback on all aspects of customer care, this policy and procedure is mainly focused on complaint handling and shall apply to complaint handling for all services and products within PMQ, unless otherwise stated or overridden by legislative requirements.

## What is a complaint?

9. A complaint can sometimes be difficult to determine. As a guide, PMQ define a complaint as being an expression of dissatisfaction with the quality of service, or a product purchased and/or provided, usually falling under one of the following categories:
  - PMQ have failed to do something we should have.
  - PMQ have done something badly or in the wrong way.
  - You feel that you have been treated unfairly or discourteously.

## Policy Statement

10. PMQ is committed to responding to complaints about our products and services in a timely and open manner, ensuring that we look at the matters raised impartially, consistently, and thoroughly.
11. We view complaints as an important and useful source of feedback about how we have performed and how we can improve in future. When things go wrong, PMQ will acknowledge our mistakes and try to put things right. We promise that we will not treat you unfairly because you have raised a complaint with us, and that your matter will be dealt with sensitively, considering your individual circumstances and establishing the facts of your case. PMQ promises to listen to you, to understand the complaint and the outcome that you are seeking.
12. PMQ have a three-stage approach to dealing with complaints. Each stage must be followed in numerical order before it can be progressed to the next stage, and this should be signposted in the correct manner and at the right time by the person receiving the complaint.
13. When responding and providing the outcome to any given stage, PMQ will give reasons for our decisions based on our guidelines, policies, and statute (where applicable) and will always try to manage your expectations regarding timeframes and outcomes. PMQ will ensure that decisions are appropriate and fair, and that the remedies provided are proportionate.
14. PMQ will always act fairly regarding complaints made about staff members, as well as towards complainants, and will investigate objectively, impartially, and appropriately. When PMQ receive a complaint about a member of staff, we will inform them and give them an opportunity to respond.

15. Most people who contact PMQ are responsible and display acceptable behaviour. However, on rare occasions when this is not the case, PMQ accept that when contacting us to raise an issue, individuals may be distressed, upset, frustrated or angry, however, we expect to be treated as we would treat others.
16. PMQ will:
  - treat you politely and considerately.
  - respect your dignity and privacy.
  - listen and respect your views.
  - always try to provide information in a way that can be understood.
  - take into account any disabilities that you have, that may have a bearing on the situation or the nature of your complaint; and
  - where possible, make reasonable adjustments to our service, processes, or procedures in relation to your comments.

## **Issues not covered by this policy:**

17. **Complaints about a PMQ Recognised Training Provider or Third Party**  
If a candidate/apprentice is not satisfied with the service which has been provided by a PMQ Recognised Training Provider (which relates to the delivery of a PMQ related product/service), the candidate/apprentice should initially seek to resolve any issues with them directly<sup>1</sup>.
18. **Complaints regarding examination and assessment results** are covered by the Enquiries about Results Policy and Procedure.
19. **Complaints regarding bullying, harassment and discrimination** are covered by the PM Anti-Bullying policy for internal matters if the allegation relates to a PMQ employee.
20. **Complaints regarding Non-Executive Directors** will be passed on to Human Resources for investigation.
21. **Complaints relating to an individual or a firm regulated by Propertymark** and concerns regarding the **Propertymark Code of Conduct** should be reported to **Propertymark Compliance Team**<sup>2</sup>. Please bear in mind they will not investigate issues regarding the service provided by firms and/or individuals. If you are unhappy about how they have dealt with your report, you can complain under the Propertymark Complaints Policy<sup>3</sup> found on Propertymark's website.

<sup>1</sup> Refer to Appendix A for further guidance

<sup>2</sup> Propertymark Compliance Team regulate Propertymark members

<sup>3</sup> Propertymark has its own separate complaints policy and procedure

## 22. **Social media comments**

We will not engage in complaint correspondence through social media channels; however, we may try to contact you directly to follow up on any comments you have made and to advise on the appropriate channels in which to raise a complaint.

## 23. **Anonymous complaints**

To ensure that we capture all the relevant and correct information we will not accept anonymous complaints.

Where a complaint has been made by a third party, e.g., an employer on behalf of a candidate/apprentice, PMQ will write to the third-party asking that they provide express consent from the individual that they have permission to act on their behalf and that PMQ has the individual's authority to investigate and report back the findings to the third party. The individual can withdraw this consent at any stage if they no longer want the person to represent them.

If we need to obtain information held by a third party relating to a complaint, we will ask the individual concerned to provide written permission to do so.

## 24. **Performance monitoring and reporting**

Key complaint data relating to volumes and circumstances is collated and analysed on an on-going basis. The data is regularly reported to the Risk Committee.

Learning from complaints is a powerful way of improving service, enhancing the reputation of PMQ, and increasing trust among the people using our services and products. Where complaints have led to a change in services, policies, or procedures, they may be discussed in more detail with the Governing Body and Risk Committee and reported internally to staff. The purpose of this is to:

- drive improvement in service delivery
- boost confidence in the complaints process.
- help to identify patterns in complaints.
- help to effect changes to prevent the problem from recurring.

# Responsibilities

25. It is the responsibility of all employees to be familiar with the Complaints Policy, and in the event that they receive a complaint, they should follow the correct procedure.
26. The relevant team and the Responsible Officer (RO) are responsible for Stage 1 and Stage 2 complaints. Mindful of any potential conflict of interest, members of the Executive Board<sup>4</sup> and/or any relevant Head(s) of Department are responsible for investigating Stage 3 complaints.

<sup>4</sup> Chief Executive Officer (CEO), or Head of Operations (HOO).

27. It is the responsibility of the PMQ Manager to ensure that this policy and procedure is reviewed at 18-month intervals and updated, when necessary, in response to feedback or regulatory requirements.

## Legal Obligations

28. PMQ will treat everyone the same, both during and after a complaint has been made, in line with The Equality Act 2010.

29. **UK Data Protection legislation**

The statutory and/or regulatory directives and legislation on which this Policy is based upon is the current UK Data Protection legislation.

This is all applicable UK Data Protection and Privacy legislation in force from time-to-time, including:

- General Data Protection Regulation (EU) 2016/679
- UK Data Protection Act 2018
- Privacy and Electronic Communications (EU Directive) Regulations 2003 (as amended) (PECR)

30. This also includes any superseding legislation and all other applicable laws, regulations, statutory instruments and/or any codes, practice or guidelines issued by the relevant data protection or supervisory authority, in force from time to time, applicable to a party, and relating to the processing of personal data and/or governing individual's rights to privacy.

## Competency

31. It is important that all employees understand their role and responsibilities and where they are able to, resolve any issues. Where they are unable to do so, they should notify their manager as soon as possible.

## Complaints Procedure

32. To ensure making a complaint is accessible to all candidates/apprentices and PMQ Recognised Training Providers, PMQ will accept complaints in the format that is most preferred by the complainant; in writing, by email or in person (by appointment only).

33. All complainants will be asked their preferred method of communication to ensure that we continue to communicate in the most accessible way. Where the complaint leads to formal investigations, it may be appropriate for us to communicate with you in writing. If this is the case, we will also communicate with you by your preferred method where this differs.
34. Complaints regarding PMQ Recognised Training Providers must first be raised with the PMQ Recognised Training Providers themselves. All PMQ Recognised Training Providers are required to publish and comply with their own Complaints Policy. Complaints received which have not yet been heard by the PMQ Recognised Training Provider will be referred, unless the candidate/apprentice has not been able to communicate with the PMQ Recognised Training Provider under exceptional circumstances.
35. Complaints regarding PMQ products and services can be made by using the contact information below:
  - Propertymark Qualifications  
Arbon House  
6 Tournament Court  
Edgehill Drive  
Warwick  
CV34 6LG
  - [pmqgovernance@propertymark.co.uk](mailto:pmqgovernance@propertymark.co.uk)
  - 01926 417 787
36. **What happens next?**

PMQ will acknowledge your complaint within 7 working days of its receipt and will investigate the circumstances associated with it. A written response will be sent to you by your chosen method of communication once the investigation has concluded, normally within 20 working days. PMQ reserves the right to extend this timescale depending on the nature/complexity of the complaint being investigated.
37. Once PMQ has investigated your complaint, we will contact you to explain what went wrong, explain the reasons why, apologise where it is appropriate, and take action to remedy the situation as soon as possible.
38. The full reply will include details of what you can do next if you believe that your complaint has not been dealt with properly, i.e. stage 2 or stage 3 complaint.

39. In the event that you are dissatisfied with the response from PMQ, you may escalate the issue to the appropriate Regulator. Contact information for this is provided below:

- The Office of Qualifications and Examinations Regulation (Ofqual) in England ([public.enquiries@ofqual.gov.uk](mailto:public.enquiries@ofqual.gov.uk))
- Council for the Curriculum, Examination & Assessment (CCEA) in Northern Ireland ([jmcgovern@ccea.org.uk](mailto:jmcgovern@ccea.org.uk))
- Qualifications Wales/Gymwysterau Cymru in Wales ([enquiries@qualificationswales.org](mailto:enquiries@qualificationswales.org))

## **Appendix A – Guidance on Complaints about PMQ Recognised Training Providers & Third Parties**

40. The first stage of raising a complaint about a Centre/Training Provider would typically be an informal process where the candidate/apprentice would discuss their issues with their tutor, or other individuals at the PMQ Recognised Training Provider. If a candidate/apprentice is unable to discuss any issues with their tutor or other individual, or remains dissatisfied after doing so, they should then follow the PMQ Recognised Training Provider's formal complaints procedure (this would typically involve two formal stages and an appeals process).
41. After a candidate/apprentice has completed their PMQ Recognised Training Provider's full complaints procedures (and if they still remain dissatisfied with their training provider's response), the candidate/apprentice is entitled to contact Propertymark Qualifications (PMQ) by email.
42. Any complaints about a PMQ Recognised Training Provider can then be sent to the **Compliance, Governance & Risk Team** via email ([pmqgovernance@propertymark.co.uk](mailto:pmqgovernance@propertymark.co.uk)), detailing the complaint and including any other relevant information. Complaints from candidates/apprentices concerning PMQ Recognised Training Providers are recorded and managed through PMQ's training provider risk management procedures.
43. PMQ will carry out an investigation into the complaint which will involve contact with the training provider concerned.