

Complaints and Appeals Policy and Procedure

Contents

PART A - POLICY	3
1. Our commitment	3
4. Types of complaints and appeals	3
5. Non-retaliation	5
6. Confidentiality	5
7. Data protection	5
PART B - PROCEDURE	6
1. Complaints procedure	6
2. Appeals procedure	6
3. Contact details	7
4. Review	7

PART A - POLICY

1. Our commitment

The GCC Board Directors Institute (GCC BDI) is committed to providing high-quality education for individuals sitting on boards and board committees and those interacting with and/or supporting boards and board committees. This Complaints and Appeals Policy and Procedure (the Policy) establishes a framework within which participants, are able to raise matters of concern in relation to their dealings with GCC BDI, its staff, faculty and consultants.

Any person who uses Policy will be treated with dignity, respect, and professionalism. Filing a complaint in good faith will in no way be used against the complainant or have a negative impact on any future relationship between the complainant and GCC BDI.

2. Scope

This policy and procedure applies to:

- a) Current participants enrolled in any GCC BDI programme, workshop, tutorial or event
- b) Recent participants who have completed or left a GCC BDI programme, workshop, tutorial or event, provided that the complaint or appeal is submitted within 30 calendar days of the end of their GCC BDI programme, workshop, tutorial or event, whichever is the later.
- c) Organisations or individuals receiving or having received mentoring or consultancy services from GCC BDI, provided that the complaint is submitted within in 30 calendar days of the end of the mentoring or consultancy.

This policy and procedure does not apply to:

- a) Complaints relating to GCC BDI staff employment matters (which are governed by GCC BDI's HR policies and procedures)
- b) Matters that are, or have been, the subject of legal proceedings. Where a participant initiates legal proceedings in respect of a matter that is already the subject of an active internal complaint or appeal, GCC BDI reserves the right to suspend its internal procedure pending the outcome of those proceedings.

3. Guiding principles

GCC BDI will give careful consideration to all complaints and appeals ensuring that they are fully investigated in a transparent manner with open dialogue and mutual understanding.

GCC BDI will endeavour to:

- a) Make this policy and procedure easily accessible to all participants by publishing it on the GCC BDI website and the Learn GCC BDI platform.
- b) Make sure both the complaints and appeals procedures are simple to use and easy to understand.
- c) Carry out impartial investigations.
- d) Allow for swift handling of any complaints or appeals.
- e) Setting time-limits for action and keeping complainants informed of the progress of their complaint or appeal.
- f) Respect a complainant's desire for confidentiality, wherever possible (some information sharing may be necessary to carry out a thorough investigation).
- g) Address all points of issue, providing an effective response and appropriate redress, where appropriate.

4. Types of complaints and appeals

Distinction between a complaint and an appeal

A complaint is a formal expression of dissatisfaction with a service, process, action or behaviour of GCC BDI, its staff, faculty or consultants.

An appeal is a formal request to review an assessment result or outcome.

Where a submission contains both a complaint and an appeal element, GCC BDI will identify the applicable procedures for each element and inform the participant of how they will be managed, whether concurrently or sequentially.

Minor complaints

These types of complaints are not covered by this policy and procedure. They include, but are not limited to, issues relating to the venue, refreshments provided during the workshop, audio/visual issues, seating arrangements, security, and cleanliness of the facilities.

All minor complaints should be notified as soon as possible to the GCC BDI staff member responsible for the event/programme. This staff member will be identified at the start of the programme/event.

The GCC BDI staff member will seek to resolve the matter as soon as is practicable to the satisfaction of the complainant.

If the staff member is the cause of the complaint, or if the matter is unable to be resolved to the satisfaction of the complainant, the complainant may wish to make a formal complaint in writing to the CEO of GCC BDI whose contact details are provided at the end of this document.

Major Complaints

These types of complaints are covered by this policy and procedure and fall into three categories:

- a) **Misconduct complaints**, including but not limited to, theft, inappropriate behaviour, bullying, harassment, discrimination, fraud, assessment irregularities, breach of legislation and regulations or breach of GCC BDI policies and procedures.

Any alleged cases of assessment irregularities will automatically and immediately be referred to the Examinations and Awards Committee (EAC).

- b) **Assessment results complaints**

An assessment results complaint may be made where there is evidence to show one or more of the following:

- i. That there was an error in the assessment paper.
- ii. That the subject matter is not within the scope of the module being examined, noting that the participant manual serves as a guide rather than an exhaustive reference, and that candidates are expected to demonstrate broader critical understanding of the subject.
- iii. Performance was affected by mitigating circumstances, such as but not limited to, ill-health or technology, that a participant could not report at the time for valid reasons, and that the mitigating circumstances have not been taken into account in awarding the result.
- iv. The approved regulations and procedures for the examination were not followed.

Where mitigating circumstances is relied upon as the grounds for appeal, evidence of the mitigating circumstances must be compelling and substantiated by an independent third party.

Further information on assessments can be found in the Assessment Policy and Procedure, a copy of which is available on the GCC BDI website and Learn GCC BDI platform.

Once major complaints are notified in writing to GCC BDI as per the complaints procedure below, they will be referred to in this policy and procedure as formal complaints.

- c) **General Complaints**, including but not limited to misrepresentation of events in marketing materials, health and safety, data/privacy protection infringements, and non-compliance with laws, regulations, standards and codes of practice.

5. Non-retaliation

GCC BDI will not tolerate any adverse action against anyone as a result of a complaint, appeal, or investigation. Any employee, faculty, or consultant of GCC BDI who retaliates will be disciplined appropriately, up to and, for severe cases, including termination of their employment or contract for services. Any person who believes they are experiencing negative or adverse action as a result of submitting a complainant or appeal should contact the GCC BDI CEO or in the case that the GCC BDI CEO is the cause of the adverse action, the chair of GCC BDI board. Contact details for both can be found at the end of this document.

6. Confidentiality

During the complaint and appeals procedures, the confidentiality of information received and any express wishes of the complainant for confidentiality will be protected to as great an extent as possible. However, confidentiality cannot be guaranteed in light of GCC BDI's obligation under this policy and procedure to act upon the complaint and to investigate it. This is consistent with the need to conduct a thorough and impartial investigation. Wherever possible, confidentiality will be strictly maintained by GCC BDI and those involved in the investigation. During an investigation, especially one into misconduct, GCC BDI requests that the complainant, any person(s) being investigated, and any witnesses also maintain confidentiality in respect to the investigation, refraining from discussing the investigation with anyone not involved in the investigation.

7. Data protection

A complainant consents to GCC BDI holding and using as appropriate their personal data to be used in connection with a complaint and/or appeal.

Personal data includes data relating to a natural person who can be identified, directly or indirectly, by the information, including, but not limited to, an identification number, or one or more factors specific to his physical, physiological, mental, economic, cultural, or social identity.

GCC BDI and the complainant shall comply with any Data Protection Laws, that apply to any personal data used in or emanating from any investigation relating to any person involved or affected by the investigation and render such assistance as is reasonably requested by the other party, including, but not limited to, the provision of information regarding the existence, applicability and extent of application of Data Protection Laws in any applicable jurisdictions to that personal data.

8. Monitoring, reporting and enhancement

GCC BDI will systematically record all formal complaints and appeals, including their type, outcome and the time taken to reach resolution. The EAC has oversight responsibility for the implementation of this policy and will receive regular reports on the number, nature and outcomes of the compliments and appeals.

GCC BDI will use the data gathered through the complaints and appeals process to:

- a) Ensure and enhance the fairness and effectiveness of these procedures.
- b) Identify recurring issues and act on them at an operational or strategic level where necessary.
- c) Enhance the overall quality of the participant learning and assessment experience.
- d) Foster participant confidence in the integrity of GCC BDI's governance and quality processes.

Where complaints are resolved through informal or alternative means, GCC BDI will consider, to the extent practicable, how learning from those resolutions can be captured and acted upon.

PART B - PROCEDURE

1. Complaints procedure

GCC BDI encourages participants to seek early, informal resolution before invoking the formal complaints procedure. Informal resolution may involve a direct conversation with the relevant member of staff, faculty member, or consultant or a facilitated dialogue arranged by the Chief Governance Officer.

Major complaints should always be formalised in writing and addressed to the GCC BDI Chief Governance Officer whose contact details are provided at the end of this document. If the complaint relates to the Chief Governance Officer, then the complainant should write to the GCC BDI CEO, whose contact details are also provided at the end of this document.

Formal complaints must be received within one month of the occurrence of the event the complaint relates to. This will enable GCC BDI to fully investigate the complaint.

The written complaint should contain the following information to enable GCC BDI to deal with it as efficiently as possible:

- a) Your name, address, mobile number and email address for correspondence.
- b) Details of the complaint.
- c) What action, if any has been taken by you/GCC BDI to try and resolve the complaint (who has been spoken to and the response)
- d) What action you feel might resolve the problem at this stage.

GCC BDI will acknowledge receipt of the complaint within 5 working days of receiving it. With the receipt you will be provided with a copy of the GCC BDI Complaints and Appeals Policy and Procedure.

The complaint will be investigated by the CEO of GCC BDI if a misconduct complaint and the EAC for assessment complaints.

Where the complaint relates to the CEO, the chair of the Board of Governors will constitute a panel comprising members of the Board of Governors and Education Committee who will be responsible for investigating the complaint.

The complainant may be invited to attend meetings to discuss the complaint and/or furnish further details relating to it. In the case of a misconduct complaint, you will have the right to be accompanied by one person (for example, a friend, relative or colleague) who has the right to speak on your behalf. You must, however, always be present at the meetings, unless there is a good reason why this is not possible, and such reason has been notified to GCC BDI.

A group of participants may use this procedure to make a collective complaint, but the group must nominate one person to be the main contact for the purposes of communication and the spokesperson for the group, representing the group in all matters relating to the complaint.

A formal outcome letter will be sent to you within one month of receipt of the complaint by GCC BDI. If it is not possible to conclude the investigation within this timeframe, GCC BDI will keep you advised of the investigations progress and a mutually agreed date for resolution will be set. The outcome letter will:

- a) Set out the findings of the investigation with clear reasons.
- b) State the decision reached
- c) Where the complaint is upheld (in whole or in part), explain the remedy to be implemented, including its timeline, and whether an apology will be offered.
- d) Advise the complainant of their right to appeal the outcome under the appeals procedure set out below.

If the matter is unable to be resolved to the satisfaction of the complainant, the complainant may wish to appeal the resolution.

2. Appeals procedure

Appeals must be submitted in writing to the appropriate person named under this policy and procedure within 14 calendar days of receipt of the outcome letter from a formal complaint.

The grounds for appeal should be clearly stated. An appeal may only be made where there is evidence to challenge the factual basis of the findings of the investigation conducted as a result of a formal complaint.

A written response to your appeal, setting out actions taken or to be taken, will normally be sent to you within one month of receipt of the appeal. If it is not possible to conclude the appeal within this timeframe, you will be advised of the investigations progress and a mutually agreed date for resolution will be set. An appeals verdict is final.

There are two appeals procedures one for misconduct appeals and the other for assessment results appeals:

1. Misconduct appeals

These appeals will be dealt with by the board of GCC BDI. Appeals should be submitted in writing to the Chief Governance Officer, copied to the CEO of GCC BDI, within 14 calendar days of receipt of the outcome letter from a formal complaint. Contact details for both can be found at the end of this document.

2. Assessment results appeals

These appeals will be dealt with by the EAC. Appeals should be submitted in writing to the Chief Governance Officer, copied to the CEO of GCC BDI, within 14 calendar days of receipt of the outcome letter from a formal complaint. Contact details for both can be found at the end of this document.

A fee of USD 100 is payable for an exam results appeal. The fee should be paid on submission of the appeal request. This fee will be returned to the participant if the appeal is successful.

A written response to the appeal will normally be issued within 30 calendar days of receipt. If it is not possible to conclude the appeal within this period, the appellant will be notified of the delay and a revised date agreed. The appeal outcome letter will set out the findings, the decision, and the reasons for that decision, together with any remedy where the appeal is upheld.

The appeal verdict is final.

3. Contact details

All complaints and appeals should be sent via the Chief Governance Officer at complaintsandappeals@gccbdi.org.

With the exception of complaints relating to the Chief Governance Officer which should be sent to the CEO of GCC BDI at john.gollifer@gccbdi.org.

4. Review

The EAC is the owner of this document. This policy and procedure will be reviewed at least every three years, or sooner if triggered by:

- a) A significant complaint or series of complaints indicating a systemic issue.
- b) A material change in GCC BDI's accreditation framework or applicable regulatory requirements
- c) A substantive change in the structure or delivery of GCC BDI's programmes.

Management has authority to make changes to this policy that do not impact on the substance of the policy, including, but not limited to, those of an administrative nature.

Version control

Version number	Approving body, date reviewed and approved	Next review date
V6	Examinations and Awards Committee: 16 June 2026	June 2029