

Policy Title: Ulster University Student Complaints Procedure

Decision: Screen out (with mitigation)

Contact: Maria Lyons

Date of Completion: 01 October 2025

Part 1: Policy Scoping

Information about the policy

Name of the Policy

Ulster University Student Complaints Procedure

Is this an existing, revised, or new policy?

This is an existing procedure, revised through a task and finish working group.

What is it trying to achieve? (For example, intended aims and outcomes)

The procedure is designed to provide an accessible, structured and fair method by which students can raise complaints about any aspect of the academic or other services provided by the University. Previously, it did not cover grievances relating to personal harassment or discrimination on sexual, religious, racial or other grounds; requests for review of academic decisions; complaints relating to the Students' Union; appeals against decisions taken under disciplinary proceedings and complaints about businesses operating on University premises but not owned by the University.

Are there any Section 75 categories which might be expected to benefit from the policy? If so, explain how below.

Note: The Section 75 categories are:

- religious belief
- political opinion
- racial group
- age
- marital status
- sexual orientation
- sex (men and women generally)
- disability
- dependants

The procedure is likely to have a positive impact on equality of opportunity for all Section 75 categories. The revised procedure will enable complainants to raise complaints of discrimination.

Who initiated or wrote the policy?

The procedure was agreed the Academic Policy Committee (1996). It was subject to a update to correct information, with respect to how to make a complaint, in December 2024.

Who owns and implements the policy?

The Pro Vice Chancellor Academic Quality and Student Experience owns the procedure and it is implemented by the Student Academic Affairs Team. A report detailing complaints received is presented annually to Senate.

Implementation factors**Are there any factors which could contribute to or weaken the intended aim or outcome of the policy?**

Yes

If yes, are they financial, legislative or other?

Financial: Adequate resources to implement and manage the Procedure

Legislative: Changes to legislation. Public Services Ombudsman Act (NI) 2016 sections 5, 18 and 21.

Other: Requirements of NI Public Services Ombudsman, Competitions and Market Authority, Quality Assurance Agency for Higher Education Department for the Economy, Trading Standards, Advertising Standards Agency.

Main stakeholders affected

Who are the internal and external stakeholders (actual or potential) that the policy will impact upon?

- Staff
- Students (current or past within 6 months of graduation or exiting)
- Other public sector organisations (NIPSO, Department of Economy, Competition and Markets Authority, Quality Assurance Agency for Higher Education)
- Trade Unions (Reps)
- Other (Students Union)

Other policies with a bearing on this policy

What are they and who owns them?

Policy: Admissions Complaint Procedure

Policy owner: Pro Vice Chancellor Academic Quality and Student Experience

Policy: Academic Appeal

Policy owner: Pro Vice Chancellor Academic Quality and Student Experience

Policy: Procedures for Review of Decisions in Research Studies Handbook

Policy owner: PVC Research

Policy: Bullying and Harassment (Dignity at Work and Study) Policy

Policy owner: Chief People Officer

Policy: Students Union Complaint Procedure

Policy owner: Students Union

Policy: Student Conduct Ordinance XXXVI

Policy owner: Pro Vice Chancellor Academic Quality and Student Experience

Policy: People, Place and Partnership – Delivering Sustainable Futures For All Strategy

Policy owner: Vice Chancellor

Available evidence

What evidence or information (both qualitative and quantitative) have you gathered to inform this policy? Please specify details for each of the Section 75 categories below.

Note: Evidence can come from many sources. Examples include the University's management information systems, internal or external research, surveys or consultation exercises. The Equality Commission has produced a guide to [signpost to S75 data](#). Anecdotal evidence, such as feedback from service users may also be used.

Religious Belief

The University's EO data were reviewed. On 6 February 2024, our staff profile was 52.0% Catholic and 48.0% Protestant. Compared with 6 February 2019, this indicates a 2.9% increase in Catholic staff.

In the Academic Year (AY) 2023 - 2024, 58.3% of our students identified as Christian and 11.1% identified as having 'No Religion'. Compared with AY 2018-2019, this indicates an 18.2% decrease in students who identified as Christian and a 2.5% decrease in students who identified as having 'No Religion'.

Political Opinion

The University does not collect information on Political Opinion or make assumptions regarding Political Opinion based on Community Background.

Racial Group

The University's EO data were reviewed. On 6 February 2024, our staff profile was 92.8% White and 7.2% Black and Minority Ethnic (BME). This indicates a 1.8% increase in BME staff compared with 2019.

In AY 2023 - 2024, 9.9% of students identified as BME. This indicates a 4.9% increase in BME students compared with AY 2018 - 2019.

Our BME profile suggests that we are twice as diverse as the local population, as the Northern Ireland Census 2021 suggests that 3.4% of the NI population is BME.

Age

The University's EO data were reviewed. On 6 February 2024, 31.1% of our staff were in the 46-55 age band and 25.8% of staff were in the 36-45 age band. 26.2% of staff were aged '56 and above', which represents a 3.8% increase compared to 2019.

In AY 2023 - 2024, the majority of students (67.0%) were aged '21 and under 40'. This indicates a 5.6% increase in students within this age band compared with AY 2018 - 2019.

Marital Status

The University's EO data were reviewed. In February 2024, 56.0% of staff were 'Married or in a Civil Partnership', a decrease of 6.0% compared to 2019.

In AY 2023 - 2024, 63.8% of students were 'Single', a 14.6% decrease compared with AY 2018 - 2019.

Sexual Orientation

The University's EO data were reviewed. In 2024, 74.0% of staff were 'Heterosexual'; 4.3% were 'LGBT+' and 21.4% were 'Not Known'.

Although we collect student data on sexual orientation, this is not considered to be reliable.

Men and Women generally

The University's EO data were reviewed. In 2024, 58.0% of staff were 'Female'. This indicates a 2.0% increase in female staff compared with 2019.

In AY 2023 - 2024, 61.2% of students were 'Female', a 4.3% increase compared with AY 2018 - 2019.

Disability

The University's EO data were reviewed. In 2024, 6.0% of staff declared a disability, an increase of 1.2% compared with 2019.

In AY 2023 - 2024, 8.4% of students declared a disability, a decrease of 2.0% compared with AY 2018 - 2019.

Our disability declaration rate is lower than expected, compared with the local population. The NI Census (2021) found that 24% of the NI population stated that their day-to-day activities were limited because of a long-standing health problem or disability.

Dependants

The University's EO data were reviewed. In 2024, 43.8% of staff had dependants. This indicates a decrease of 3.9% compared with 2019.

In AY 2023 - 2024, 11.4% of students declared they had dependants, a decrease of 4.6% compared to AY 2018 - 2019.

Needs, experience and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular policy or decision?

Religious Belief

General research shows this category will want assurance they will not face discrimination on grounds of belief or may feel they will experience bias. Similarly, there may be concerns a particular complaint is not treated with enough significance due to religious differences.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of religious belief. In relation to peer review of other Higher Education Institutions there is mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from Human Resource (HR) partners.

If complaints are made external to the University (through the Court or Tribunal system), the [Equality and Human Rights Commission](#) notes priorities for protecting religious belief include the use of clear definitions, understanding and representation.

[In this guide](#), which relates to both political and religious discrimination, the Equality Commission Northern Ireland (NI) states '*Complaints relating to discrimination in respect of education, premises, the provision of goods, facilities or services, or where an employment relationship has come to an end must be made to the county court within six months of the date the discrimination took place.*'

Political Opinion

General research shows it is important to ensure the complaint procedure protects political freedoms and the right to make a complaint without being at a disadvantage.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of political opinion. In relation to peer review of other Higher Education Institutions there is mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

Racial Group

General research shows the complaint procedure and process needs to be accessible in terms of, but not limited to, language literacy level and formatting. It is also important to ensure the complainant can trust the procedure to be fair, accessible and equitable.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of racial group. In relation to peer review of other Higher Education Institutions there is mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

[The Equality Commission for Northern Ireland](#) (NI) notes being treated unfairly on racial grounds, includes colour, race, nationality, ethnic or national origins or being a member of the Irish Traveller community.

The [Equality Commission NI](#) notes public authorities have due regard to the need to promote equality of opportunity between various groups, including persons of different racial groups. It is noted complaints relating to racial discrimination in respect of education must be made to the county court within 6 months of the date the discrimination took place. It should be noted this applies to external complaints of discrimination rather than how to deal with a complaint of discrimination internally.

The [Equality Commission NI](#) also notes that a public authority should respond to a complainant within the specific timescales as detailed in its complaint procedure contained within its equality scheme.

Age

General research shows mature students may face challenges with family or work commitments. Younger students may need extra guidance in navigating the complaint procedure and understanding how to engage with the process.

The priorities for both groups show the need for accessible support services, and a complaint procedure that is free from bias.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of age. In relation to peer review of other Higher Education Institutions there is

mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

The [Equality Commission NI](#) outlines that it is unlawful for universities to discriminate in the terms on which they offer to admit a person as a student, by refusing to accept and application as admission, in the way in which it affords access to any benefits and by excluding that person from the establishment. It notes complaints about discrimination must be made to the County Court. It should be noted this applies to external complaints of discrimination rather than how to deal with a complaint of discrimination internally

The [Equality Commission NI](#) also notes that a public authority should respond to a complainant within the specific timescales as detailed in its complaint procedure contained within its equality scheme.

Marital Status

General research shows that persons in this category may have familial responsibilities which impact on meetings or deadlines. They may also have experienced challenges in terms of academic performance due to competing priorities. As such, the complaint procedure needs to be transparent and flexible.

Sexual Orientation

General research shows this group may have concerns over confidentiality if the sexual orientation of the complainant is not commonly shared. Furthermore, anecdotal evidence would suggest complainants in this group may have concerns they have been treated unfairly in the past.

The complaint procedure should align itself with broader University policies and procedures on inclusion and equality.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of sexual orientation. In relation to peer review of other Higher Education Institutions there is a mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

The [Equality Commission NI notes](#) that complaints relating to discrimination in respect of education, must be made to the county court within six months of the date the alleged discrimination took place. It is also noted that where a complaint relates to certain public sector education, there is a requirement to give two months' notice to the Department of Education, and in these circumstances, the time limit is extended to eight months.

Men and Women generally

General research shows gender specific issues including unconscious bias and under reporting. Anecdotally, persons in this group may have experienced gender specific discrimination in the past or issues relating to mental health struggles which may impact ability to complain. Priorities for this group would be to ensure inclusive, gender neutral procedures

The previous complaint procedure did not facilitate complaints of discrimination on grounds of sexual orientation. In relation to peer review of other Higher Education Institutions there is a mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

The [Equality Commission NI notes](#) that a public authority should respond to a complainant within the specific timescales as detailed in its complaint procedure contained within its equality scheme.

Disability

Research generally shows persons with a disability may require reasonable adjustments to engage with a complaint procedure. This might include revised timeframes, in-person meetings or online meetings. Particular needs in relation to a disability may also be required. Furthermore, support with formats, deadlines and accessibility.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of disability. In relation to peer review of other Higher Education Institutions there is a mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

In its guidance on the [Special Educational Needs and the Disability Order](#), the Equality Commission NI notes that concerns about disability discrimination can often be resolved informally through a university's internal complaint system. However legal time limits still apply and if the complaint is not dealt with satisfactorily, an application should be made to the County Court.

The [Equality Commission NI](#) also notes that a public authority should respond to a complainant within the specific timescales as detailed in its complaint procedure contained within its equality scheme.

Dependants

Research shows in general terms this group requires flexibility with timelines and formats for making a complaint. Furthermore, consideration would have to be given to the removal of any unfair barriers within the complaint procedure.

The previous complaint procedure did not facilitate complaints of discrimination on grounds of having dependents. In relation to peer review of other Higher Education Institutions there is a mixed view. Some Institutions permit complaints of discrimination under the complaint procedure and others do not. It is noted in some circumstances where the complaint procedure permits an avenue for complaints of discrimination to be considered, input is required from HR partners.

Persons within this group would have priorities which include a clear, accessible and flexible procedure, ensuring necessary accommodations are made.

The [Equality Commission NI](#) notes that a public authority should respond to a complainant within the specific timescales as detailed in its complaint procedure contained within its equality scheme.

Consultation

Consultation with relevant groups, organisations or individuals about the policy can provide useful information about issues or opportunities which are specifically related to them (that is evidence to inform the policy).

Please indicate whether you carried out or intend to carry out any consultation exercises prior to equality screening?

Yes, the following groups were consulted during the revision of this procedure:

- Policy Clinic
- Task and finish working group made up of academic and professional services staff from across the University
- JUCNC and HSW Policy Working Group
- Students Union
- University Senate

Part 2: Screening questions

Introduction

The answers to the following screening questions will assist the University in making a decision whether or not there is a need to carry out an equality impact assessment on the policy. The following information is provided to help you to identify and comment on the level of likely impact of the policy in question 1 to 4.

Select 'major' impact if:

- f) The policy is significant in terms of its strategic importance;
- f) Potential equality impacts are unknown, because, for example, there are insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
- f) Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
- f) Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
- f) The policy is likely to be challenged by way of judicial review;
- f) The policy is significant in terms of expenditure.

Select 'minor' impact if:

- e) The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
- e) The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;

- e) Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunities for particular groups of disadvantaged people;
- e) By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations;
- e) Differential impact observed and opportunities exist to better promote equality of opportunity and/or good relations.

Select 'none' if:

- b) The policy has no relevance to equality of opportunity or good relations;
- b) The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations.

Taking into account the evidence presented in Part 1, please complete the screening questions (Question 1 to 4).

Screening questions

1. What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 categories?

Details of the likely policy impacts on **Religious Belief**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

What is the level of impact?

Minor +

Details of the likely policy impacts on **Political Opinion**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact

Minor +

Details of the likely policy impacts on **Racial Group**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact

Minor +

Details of the likely policy impacts on **Age**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact

Minor +

Details of the likely policy impacts on **Marital Status**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact

Minor +

Details of the likely policy impacts on **Sexual Orientation**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact

Minor +

Details of the likely policy impacts on **Men and Women generally**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact
Minor +

Details of the likely policy impacts on **Disability**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact
Minor +

Details of the likely policy impacts on **Dependants**

The revised procedure is likely to have a positive impact on equality of opportunity for this group. It will enable complainants to raise complaints of discrimination.

Level of impact
Minor +

2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?

Religious Belief

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Political Opinion

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Racial Group

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Age

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Marital Status

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Sexual Orientation

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Men and Women generally

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Disability

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

Dependants

No, the procedure has been revised so that complainants are able to raise a complaint of discrimination.

3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion or racial group?

Religious Belief

Details of the likely policy impacts on **Religious Belief**

The procedure is unlikely to impact on good relations between people of different religious belief; it bears no relevance to good relations.

Level of impact
None

Political Opinion

Details of the likely policy impacts on **Political Opinion**

The procedure is unlikely to impact on good relations between people of different political opinion; it bears no relevance to good relations.

Level of impact
None

Racial Group

Details of the likely policy impacts on **Racial Group**

The procedure is unlikely to impact on good relations between people of different racial groups; it bears no relevance to good relations.

Level of impact
None

4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?

Religious Belief

No, the procedure bears no relevance to good relations.

Political Opinion

No the procedure bears no relevance to good relations.

Racial Group

No the procedure bears no relevance to good relations.

Additional considerations

Multiple identity

5. Generally speaking, people can fall into more than one Section 75 category. Taking this into consideration, are there any potential impacts of the policy or decision on people with multiple identities? (For example, disabled minority ethnic people; disabled women; young Protestant men, and young lesbians, gay and bisexual people).

Yes

Please specify the relevant Section 75 categories concerned below.
Provide details of the policy impact and data which describes the policy impact.

All those impacted by this procedure hold multiple identities. It is envisaged that the procedure will benefit all Section 75 categories as it has been revised so that complainants are able to raise a complaint of discrimination.

Disability Duties

6. Does the policy provide an opportunity to encourage disabled people to participate in University life?

Yes, the procedure offers disabled people the opportunity to raise complaints of discrimination.

7. Does the policy provide an opportunity to promote positive attitudes towards disabled people?

No, the procedure is designed to provide an accessible, structured and fair method by which students can raise complaints about any aspect of the academic or other services provided by the University.

Part 3: Screening decision

Based on the evidence considered and outlined in Part 1 and the responses to the screening questions (Part 2), please indicate the screening decision for this policy.

Note: The University should take particular care not to screen out policies that have a procurement aspect if there is potential to promote equality of opportunity through the procurement of services.

☐

Screen in the policy (that is, subject to an Equality Impact Assessment). The likely impact is **major** in respect of one, or more of the equality of opportunity or good relations categories.

☐

Screen out the policy without mitigation or an alternative policy proposed to be adopted (that is, **no** Equality Impact Assessment). The likely impact is **none** in respect of all of equality of opportunity or good relations categories.

☒

Screen out the policy and **mitigate the impacts on equality by amending or changing the policy**, or by **developing an alternative policy or action** (that is, **no** Equality Impact Assessment). The likely impact is **minor** in respect of one or more of the equality of opportunity or good relations categories.

If the decision is to subject the policy to an equality impact assessment (that is, 'screen in' the policy), please provide details of the reasons.

Not applicable

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), please provide details for the reasons.

Not applicable

If the decision is not to conduct an equality impact assessment (that is, 'screen out' the policy), and mitigate the impacts on equality of opportunity by amending or changing the policy, or by developing an alternative policy or action, please provide reasons to support your decision, together with the proposed changes, amendments or alternative policy.

The likely impact is **minor** in respect of one or more of the equality of opportunity or good relations categories, however this impact is likely to be positive.

The procedure is designed to provide an accessible, structured and fair method by which students can raise complaints about any aspect of the academic or other services provided by the University.

In line with University policy, this procedure will be reviewed two years after it has been implemented and if necessary amended.

Timetabling and prioritising

If the policy had been '**screened in**' for an equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1 to 3, with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

Priority rating for timetabling the equality impact assessment in terms of effect on equality of opportunity and good relations:

Not applicable

Priority rating for timetabling the equality impact assessment in terms of social need

Not applicable

Priority rating for timetabling the equality impact assessment in terms of effect on people's daily lives

Not applicable

Priority rating for timetabling the equality impact assessment in terms of relevance to the University's functions

Not applicable

Note: The Total Rating Score will be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the University in timetabling. Details of the University's Equality Impact Assessment Timetable will be included in its quarterly Screening Reports.

Is the policy affected by timetables established by other relevant public authorities?

Not applicable

Approval and authorisation

Screened by: 

Position or Job Title: PVC Academic Quality and Student Experience

Date screened: 29 September 2025

Approved by: 

Position or Job Title: Chief People Officer

Date approved: 01 October 2025

Review

This policy is due for review (in terms of its impact on equality of opportunity and good relations) by the policy owner on: 01 October 2027