

**Appendix G – Examination Complaint/Feedback Policy**



**EXAMINATION COMPLAINT / FEEDBACK POLICY AND FORM**

## Revision History

Version	Date	Author	Comments
0.1	July 2017	Examinations Manager	New Policy
1.0	August 2017	Examinations Manager	Published Policy
1.1	January 2018	Theory Examinations Coordinator	Published Policy
1.2	August 2018	Theory Examinations Coordinator	Published Policy
1.3	September 2019	Examinations Manager	Published Policy
1.4	March 2020	Examinations Manager	Published Policy

**Review date:** March 2019 and then every year thereafter during the relevant Examinations Executive Committee

**Approval:** Examinations Executive Committee March 2019

Name	Date	Version	Comments
Examinations Executive Committee	July 2017	0.1	
Examinations Executive Committee	August 2019	1.3	
Examinations Executive Committee	March 2020	1.4	

## Relevant Policies, Templates and Forms:

The following policies, procedures and guidance should be used or referred to when necessary alongside this policy. All policies and templates are available on the RCPCH website once finalised and approved.

Name	Version	Date
MRCPCH and DCH: Regulations and Rules	2.1	August 2019
Theory examination re-marking policy	1.1	July 2017
Examination Results MRCPCH/DCH theory and clinical examinations	1.2	August 2019

## **Introduction**

**This policy consists of:**

- A policy 'Examinations' Candidate Complaints / Feedback Policy,'
- Process of appealing a complaint outcome
- Flowchart to illustrate timeline for complaint and complaint outcome appeal review
- A complaint/feedback form 'Examinations Complaints & Feedback Form'.
- A complaint outcome appeal form 'Candidate Complaint Outcome Appeal Form'.

# **Examinations Candidate Complaints / Feedback Policy**

## **1. Our Policy**

The RCPCH aims to deliver all MRCPCH and DCH examinations to a high standard and to ensure that they are fair, transparent and free from discrimination. The College strives to comply with best practice and is regulated in this regard by the General Medical Council (GMC). Final decisions regarding complaints received will be made in accordance with this policy and any other statutory requirements.

Whilst the College tries to respond to the wishes and aspirations of the healthcare professionals accessing our examinations, the College recognises that, on occasion, its service may fall short of expectations. If an examination candidate for MRCPCH and DCH examinations believes this has happened, they can use this complaints procedure, which outlines how to make a complaint, how it will be handled and how a complaint outcome can be appealed. All complaints received regarding the quality of delivery of a specific examination will be dealt with in a consistent and equitable way.

Candidates making a complaint should only do so having read and agreed to the RCPCH Examinations regulations, including this complaint procedure.

Candidate complaints, and all accompanying statements and records, will be kept confidential as far as is possible consistent with facilitating a fair and thorough investigation. Whilst candidate's privacy and confidentiality will be respected, this needs to be balanced with:

- The need for an open and fair investigation
- Any necessary remedial action being taken
- The outcome of the investigation to be reported appropriately
- Action to be taken to improve the College's processes and quality of service.

Candidate complaints may therefore need to be shared with other stakeholders who have been involved with the examination process and responsible for their design and delivery. Examples include invigilators, examiners, hosts, patients and carers and members of the RCPCH Examinations Executive Committee.

## **2. Scope of the policy**

Candidates can submit a complaint about any aspect of the examination process if they have evidence that published processes or procedures pertaining to their examination have not been followed correctly.

## **3. Limits of the policy**

The College excludes the following from its complaints process:

- (a) if candidates allege unfairness of practice and process but do not supply evidence to substantiate their allegation
- (b) anonymous complaints or complaints sent on behalf of the candidate.
- (c) exam results will not be reviewed during investigations into complaints.

If an issue arises on the day of a candidate's examination, the candidate should speak to the Senior Examiner (clinical examination) or Lead Invigilator (theory examination) on duty at their examination centre. These individuals can be identified by approaching any

member of staff present on the examination day to enquire. Any complaint issued to these identified leads will be documented on the day of the examination and submitted to the RCPCH Examinations Team for further investigation.

#### **4. How does a candidate make a complaint?**

Candidates who wish to submit a complaint or provide feedback must complete an RCPCH examination complaint/feedback form.

Candidates attempting to submit a complaint informally by telephone or email will be requested to use the standard form as it ensures consistent and appropriate investigations are conducted.

The sooner a candidate makes a complaint, the easier it is to investigate, and the sooner the College can address a candidate's concerns or potential issues with service delivery. For clinical exams, complaints are typically reviewed at Clinical Exam Board meetings held prior to exam results being made available to candidates. For theory exams, complaints will be formally reviewed by the Assistant Officer for Examinations, the Quality and Standards Manager and the Examinations Manager before examination results are published. Other senior theory examiners may also be required to assist in this review.

For these reasons, complaints regarding any specific exam diet must be submitted no later than 7 calendar days from the completion of the exam. If a complaint is received after this deadline it may not be possible to review it within the stated timelines within this policy and the complaint may be carried over to the next scheduled Clinical Exam Board meeting, the next Exam Complaints Review meeting or the next Examination Executive Committee meeting at the College's discretion.

Please note that any complaint submitted after the 7 day deadline may not be reviewed by the Examinations Team unless there are extenuating circumstances that account for the delay. Documented evidence supporting reasons for delay in submitting complaints within the 7 day time frame would need to be provided with the complaint.

#### **Please note the following for theory exam day issues:**

- BTL is the College's test centre and software provider. To notify them of an issue or incident - Complete **BTL Incident Form** at the test centre on the day of the exam. Failure to formally raise an issue and complete a BTL Incident Form may impact on the outcome of a complaint investigation.
- Formal complaint procedure - Complete **RCPCH Examination Complaint Form** and send to RCPCH within 7 days of the incident attached with **BTL Incident Form** from the day of the exam.
- RCPCH computer-based examination scores and grades are not processed automatically. Results analysis is undertaken once all results are extracted and the review of all centre invigilator reports has been completed. There are further results review meetings that are held following the examination date to ensure focused scrutiny of question performance.

#### **Please note the following for clinical exam day issues:**

- RCPCH Senior Examiners monitor the standard of exam delivery at each clinical exam centre. If candidates experience any issue on the day of a clinical exam they

must notify the Senior Examiner at that centre at the end of their exam. Senior Examiners are prepared to receive feedback after each exam session. The Senior Examiner should add details of the concern into the Senior Examiner Report Form for the centre. Failure to formally raise an issue with the Senior Examiner at the exam centre on the exam day may have an impact on the outcome of a complaints investigation.

- Formal complaint procedure: Complete the **RCPCH Examination Complaint Form** and send to RCPCH within 7 days of the incident indicating on the form that you had raised your concerns with the Senior Examiner at your clinical exam centre

## **5. How RCPCH (the College) will manage a candidate's complaint**

### **Stage 1**

The College will acknowledge the complaint within five working days of its receipt and confirm whether a candidate's complaint falls within the scope of this policy. If there are particular requirements which the candidate should have followed, but has not, the College will advise the candidate that the subject matter of their complaint falls outside the scope of this complaint procedure.

Complaints may vary in complexity, and in investigating them the College may need information from a variety of individuals. The College aims to answer complaints as swiftly as possible and will update the candidate as soon as it can as to the expected completion date for the investigation of their complaint.

The College aim to respond to all reviewed complaints within 30 working days from receipt of a completed complaint form.

Should for any reason there be a delay in sending the official complaint response as detailed above, the RCPCH Examinations Team will contact the complainant by email to inform them of the reason for the delay and provide assurance that the issue is continuing to be investigated providing a revised estimated completion date.

### **Stage 2**

The relevant Examination Team member and the Examinations Manager will be involved in the initial investigation of the candidate's complaint, and will gather facts relevant to the complaint, ensuring that the information gathered is accurate and complete. RCPCH Examination Team staff will refer to all key documentation. A decision will be made at this stage on whether sufficient evidence has been submitted to investigate further. Depending on the seriousness of the complaint, the Examinations Manager may decide to escalate it for review by the MRCPC Clinical Examinations Chair, the Officer for Examinations and/or the Director of Education and Training.

### **Theory Examinations**

For all RCPCH theory examinations the relevant test centre invigilator reports will be scrutinised. The College will contact our theory exam provider to gather further details on how the examination system performed on the examination day and further test centre statements if required.

If necessary, the RCPCH Psychometric Team and senior clinicians responsible for the production of content and analysis of performance will be informed of the complaint to

ensure that review of specified questions is undertaken if required. This review will be documented and referenced within the complaint response.

All complaints will be raised with the Assistant Officer for Examinations, Quality and Standards Manager and the Examinations Manager. Other Examinations Team and Quality and Standards Team staff may also be involved.

Should the complaint relate to something other than an exam day issue we will ensure to investigate this in full.

### **Clinical Examinations**

For all RCPCH clinical examinations, the relevant examination centre Senior Examiner's Report will be scrutinised. The administrator may also contact the relevant clinical examination host / host team and senior examiner to gather further statements related to observations of the examination day. If necessary, the RCPCH Psychometric Team and senior clinicians responsible for the production of content and analysis of performance will be informed of the complaint to ensure that review of specified scenario content is undertaken if required. This review will be documented and referenced within the complaint response.

All complaints received by the deadline will be raised at that diet's Clinical Examination Board. Clinical Examination Boards are meetings held at the RCPCH where senior examiners and the Chair of the MRCPCH Clinical Exam discuss the content of senior examiner reports from the relevant exam including any issues that were experienced on the examination day.

Should the complaint relate to something other than an exam day issue we will ensure to investigate this in full.

### **Stage 3**

The response from the College will contain reasons for either upholding or rejecting the candidate's complaint. Where the candidate's complaint was upheld, the Examinations Team will provide confirmation of this to the candidate along with any potential redress. In addition, if the complaint is upheld, the action taken and the lessons learned will be logged for future purposes.

## **6. Withdrawal of complaints**

A candidate can withdraw their complaint at any time by writing to the relevant RCPCH Exam Team member of staff that the candidate has been directly corresponding with regarding their complaint quoting their RCPCH reference number, examination type, examination date and name of examination centre. The candidate's complaint will then be closed permanently and will not be re-opened.

## **7. Confidentiality, data protection and retention**

Candidates are assured that they have the opportunity to raise matters of concern through the Complaint Procedures without risk of disadvantage or criticism. The RCPCH Examinations Team recognises the importance of confidentiality when handling complaints and will maintain this as far as is possible during investigations.

Complainant's data will be anonymised when considering complaints, although it may on occasion be necessary to disclose a complainant's identity to progress an investigation

further. Candidates who are not willing for their identity to be disclosed should make this clear within the complaint feedback form.

In line with RCPCH data management policies, all materials relating to complaints will be deleted upon completion of MRCPCH/DCH qualification.

## **8. Outcomes**

RCPCH examinations are taken by those wishing to demonstrate subject knowledge understanding and clinical decision-making abilities to ensure they have reached the standard of someone entering their core specialist training. For this reason, competence cannot be assumed but must be clearly demonstrated by a pass grade in the examination. It is not the policy of the RCPCH to adjust examination grades.

Complaints requesting an adjustment to a candidate's grades will not be considered.

Where a significant issue is identified that may have impacted on candidate performance whilst the outcome will stand, the examination sitting or attempt will not be counted and the details of the issue can be made available to the candidate's Educational Supervisor, Head of School, specified overseas examination training body or if required ARCP Panel. This will only take place with the candidate's express permission/consent. If appropriate a candidate's seven-year registration period may also be extended.

As previously stated the official RCPCH response to submitted complaints will be sent within 30 days from the receipt of the complaint.

If a complainant is not satisfied with the outcome of their formal complaint as reviewed at the relevant complaints meeting, there is provision for further review through the following route.

## **9. Appealing against exam complaint outcomes**

The RCPCH Examinations Team will consider appeals against complaint outcomes where there is evidence of:

- Procedural irregularity in the delivery of the examination which may have adversely affected a candidate's performance; or
- Other exceptional circumstances for which clear evidence must be provided as soon as possible after the examination day;

The outcomes of complaint investigations will be communicated to candidates in a timely manner in order to provide candidates the opportunity to appeal the outcome.

Candidates are reminded that there is a right of withdrawal from examinations and that by appearing on the day of examination and undertaking the examination they are certifying themselves as fit to do so.

### **Types of complaint outcomes MRCPCH/DCH candidates cannot appeal against**

Appealing complaint outcomes based on the following grounds:

- failing the examination by a narrow margin
- questioning academic or professional judgement



- previous candidate performance in the workplace or other examinations
- candidate position in training

Disagreeing with examination results or marks awarded by examiners does not constitute grounds for appeal.

The Exams Complaint Review Panel will not review decisions made by examiners regarding candidate marks in MRCPCH/DCH Clinical encounters or decisions made at relevant theory examination Angoff Panels at which they were not present.

The RCPCH provides copies of mark sheets to all MRCPCH and DCH Clinical examination candidates. These are intended to provide feedback to help candidates improve their skills. It is therefore strongly recommended that all candidates discuss/share their mark sheet feedback with their educational supervisor, sponsor or senior colleague before submitting any complaint outcome appeal.

Any extraordinary circumstances falling outside of the stated policy may be reviewed by the Examinations Executive Committee.

### **Procedure candidates must follow to appeal their complaint outcome**

In order for an appeal to be considered by the RCPCH, a candidate is expected to have:

- If relevant, raised the irregularity or exceptional circumstance on their exam day with the Invigilator, Senior Examiner or Host; and
- Submitted an RCPCH candidate complaints form to the RCPCH Exams Team within 7 days of the relevant exam date; and
- Submitted their complaint outcome appeal form within the time frame listed below.

MRCPCH and DCH examination candidates sitting the exam in the UK who wish to appeal against their complaint outcome must do so within 10 working days of receipt of their complaint outcome letter (calculated from the date of the letter/email).

An Exams Complaint Review Panel will be convened as soon as possible after the complaint outcome appeal deadline. Exams Complaint Review Panel meetings are typically scheduled for May, September and January each year. It is therefore the case that AKP and DCH Clinical examination candidates and some overseas based clinical exam candidates lodging a complaint outcome appeal may have to wait longer for the appeal to be considered.

### **Submissions to the Exams Complaint Review Panel must include:**

- A completed Complaint Outcome Appeals Form. The form should include the circumstances of the appeal. For clinical examinations, please provide details for each station you tick on the form stating clearly why you wish to appeal against the complaint outcome for that/these station/s. For theory examination appeals, please provide relevant details of the specific examination paper sat (e.g. FOP and/or TAS - AKP paper 1 and/or AKP paper 2). Examination Executive Committee have determined that all Complaint Outcome Appeals forms are limited to no more than 1000 words in total. If any form is received that exceeds this, the additional text will be disregarded. Testimonials, letters of support, or any additional documents and materials not on the form will not be considered by the Panel and should not be submitted.

- Ideally payment should be made via a UK personal cheque in Great British Pounds (GBP). Bank drafts and overseas cheques cannot be used to make payment for re-marks.
- If you are unable to make payment via UK personal cheque, you should call the Exams Team on 020 7092 6000 and request to speak to the administrator of the exam (either MRCPCH Clinical or DCH Clinical) to discuss alternative methods of payment.

UK cheque payments should be sent to:

Examinations Team

MRCPCH/DCH Exams Complaint Review Panel

Royal College of Paediatrics and Child Health

5-11 Theobalds Road

London WC1X 8SH

Please write your RCPCH number, name of examination (e.g. MRCPCH Clinical) and exam centre on the back of the cheque. It should be sent by registered post (DHL, UPS, Royal Mail trackable) so that you can track delivery. Please take a photograph/scan/photocopy of the cheque and proof of postage before sending, for your records and keep a note of the tracking number.

## **Investigation**

The process for investigating a complaint outcome appeal is:

- The RCPCH Exams Team will carry out an initial review to consider whether the evidence submitted meets the criteria above. The candidate will be informed if it is considered that there are no grounds for appeal and their fee will be returned to them.
- Where there are grounds for further review, it will be fully investigated by the relevant Examinations staff. Invigilators, examiners or other individuals present on the exam day may be contacted for comments. These will be included in a summary report which is submitted to the Exams Complaint Review Panel for review.
- The Panel will decide whether the appeal should be upheld based on this evidence.
- A decision will be communicated to candidates as soon as possible.

## **The Process**

The Exams Complaint Review Panel consists of 3 or 4 experienced examiners (theory/clinical) and is chaired by the Officer for Examinations. In the event that the Officer for Examinations is unable to chair the panel, a suitable deputy would be appointed. None of the Panel members will have acted as examiners for the cases that they review or have been present at the relevant Angoff Panel.

The Panel considers all complaint outcome appeals carefully, reviewing all of the evidence submitted and gathered in detail. If an appeal is related to the running of the examination, additional information will be sought from the invigilator, host centre and senior examiner.

Appeals cannot be upheld on grounds relating to the personal circumstances of candidates on the day. If candidates are acutely unwell or otherwise indisposed, they should not sit the examination and should explain their situation to the Senior Examiner.

### **Outcome of Complaint Outcome Appeals**

There are two possible outcomes for appeals:

- **Not upheld** - candidates will receive a formal letter explaining the decision not to uphold their appeal;
- **Upheld** - the attempt is expunged from the candidate's record and the Panel will determine appropriate compensation

**Any extraordinary circumstances falling outside of the stated policy would be reviewed by the Examinations Executive Committee.**

Candidates will normally be informed of the outcome of their appeal by email within 2-3 days of the Panel meeting. This may take longer where additional investigation is required. An explanation of the Panel's findings will be sent in writing approximately 15 working days after a Panel meeting.

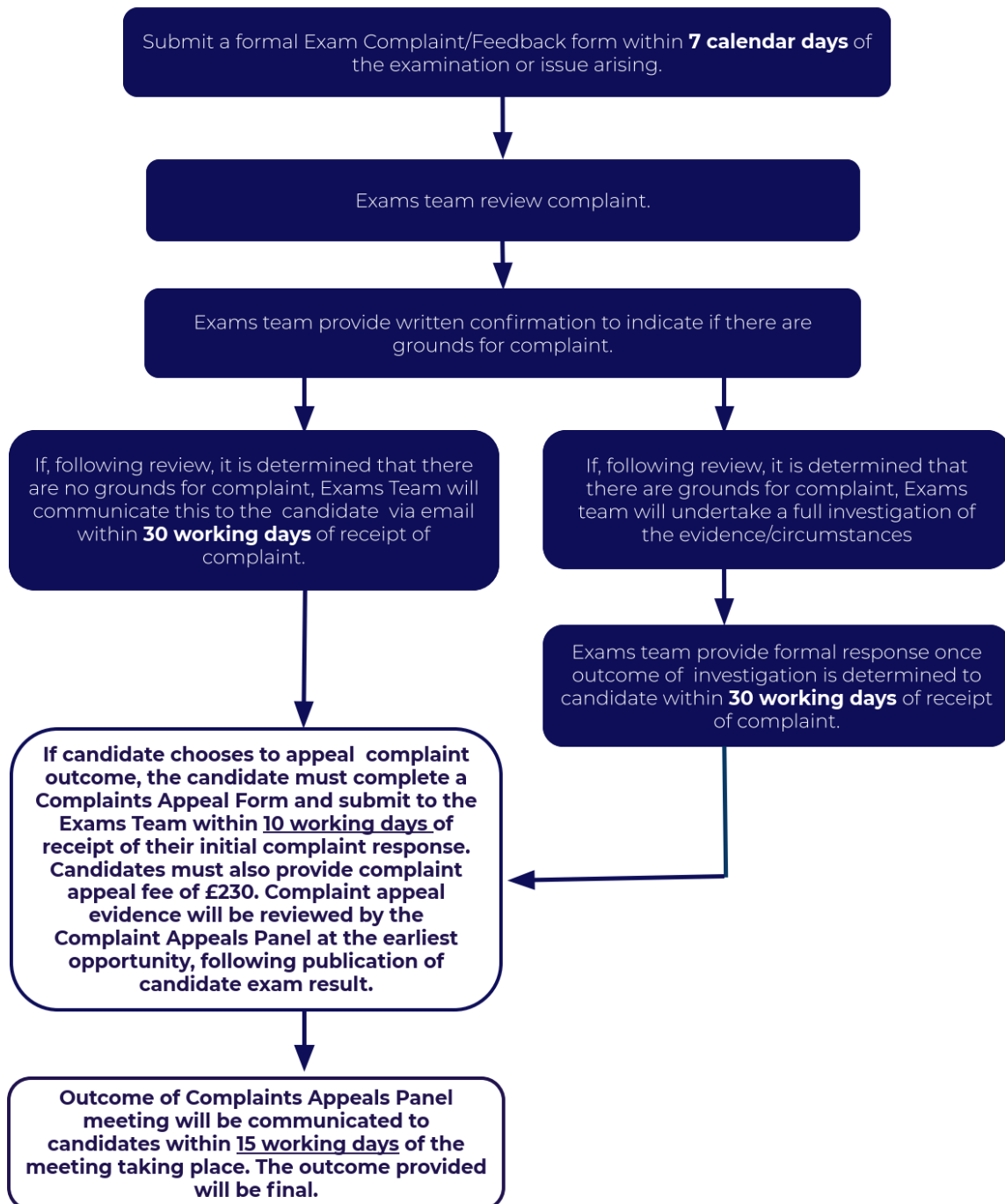
**Candidates should note that this decision is final and constitutes the end of the process. No further correspondence will be considered.**

Candidates are asked not to telephone the College regarding their appeal during this time. College staff are not able to inform candidates of the outcome of their appeal over the phone.

Candidates who are successful on appeal and have submitted a cheque to cover the fee will have their appeal fee cheque returned to them with their outcome letter.

To see all MRCPCH and DCH examination rules and regulations, go to [www.rcpch.ac.uk/exam-rules](http://www.rcpch.ac.uk/exam-rules)

## Flowchart/timeline of 'Complaint' and 'Appealing Complaint Outcome' Process



## Examinations Complaints & Feedback Form

This form should be used to provide feedback about examinations at the RCPCH or to lodge a formal complaint about an exam or related issue. Formal complaints will be responded to as per the complaint procedure detailed in the 'Examination Complaint/Feedback Policy'

If you wish to appeal a complaint outcome, you should refer to the relevant sections of the Complaint policy.

Please note that any information candidates submit on this form will be received in the strictest confidence and dealt with entirely separately from the RCPCH marking and results delivery process.

### RCPCH Candidate Details

RCPCH Number

First Name

Last Name

Contact Email Address

Telephone Number

### RCPCH Examination Details (please tick relevant box below)

FOP

TAS

AKP

MRCPCH Clinical

DCH Clinical

Country exam was held in

Exam Centre

Exam Date

Station(s) (MRCPCH or DCH Clinical only)

Please confirm if you are providing feedback or lodging a formal complaint. A formal complaint must follow the guidelines of the RCPCH Examinations Complaints Procedure and must be submitted within 7 days of the incident taking place.

Please tick

Feedback

Formal Complaint

**Details of your complaint or feedback**

No more than 1 side of A4 (hand-written or typed separately no smaller than 11-point font).

\*Theory Exams: Please tick to confirm that you raised your concerns on the day of the exam with an invigilator

\*Clinical Exams: Please tick to confirm that you raised your concerns on the day of the exam with the Senior Examiner

**Confirmation**

Please sign and date this form. An electronic signature is not acceptable. The form should be printed, signed, and scanned for return to [exams@rcpch.ac.uk](mailto:exams@rcpch.ac.uk).

I confirm that the account provided in this form is an accurate account of my experience in relation to examinations at the RCPCH.

Signed:

Date:

This form should be used to file an appeal against the outcome of a complaint submitted about your examination and must be submitted within 10 working days of their receipt of a complaint outcome.

**RCPCH Candidate Details**

RCPCH Number	
Candidate Number	
First Name	
Last Name	
Contact Email Address	

**RCPCH Examination Details (please tick relevant box below)**

FOP <input type="checkbox"/>	TAS <input type="checkbox"/>	AKP <input type="checkbox"/>
MRCPCH Clinical <input type="checkbox"/>	DCH Clinical <input type="checkbox"/>	
Country exam was held in		
Exam Centre		
Exam Date		
Station(s) (MRCPCH or DCH Clinical only)		

Tick for Yes <input type="checkbox"/>	Was the complaint/concern raised on the day of the exam with the invigilator (theory)/senior examiner (clinical)?
Tick for Yes <input type="checkbox"/>	Was a complaint form completed and sent to the exams team within 7 days (if related to an exam)?

**APPEALS PAYMENT**

- Ideally payment should be made via a UK personal cheque in Great British Pounds (GBP).
- Bank drafts and overseas cheques cannot be used to make payment for appeals.
- If you are unable to make payment via UK personal cheque, you should call the Exams Team on 020 7092 6000 and request to speak to the administrator of the exam (Clinical, DCH, FOP, TAS or AKP) to discuss alternative methods of payment.
- UK cheques should be sent to: Examinations Team/MRCPH Clinical Exams Complaint Appeal Panel/ Royal College of Paediatrics and Child Health/5-11 Theobalds Road/London/WC1X 8SH

**Details of your complaint outcome appeal**

Please detail below your grounds for appealing your complaint outcome. Please do not repeat your complaint. You must provide different grounds for why you believe the complaint outcome should be changed.

Please keep to no more than 1 side of A4 (hand-written or typed separately in no smaller than 11-point font).

**Confirmation**

Please sign and date this form. An electronic signature is not acceptable. The form should be printed, signed, and scanned for return to [exams@rcpch.ac.uk](mailto:exams@rcpch.ac.uk).

I confirm that the account provided in this form is an accurate account of my experience in relation to examinations at the RCPCH.

Signed:

Date:



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