



Part XVI: IQA Accreditation Appeals, Complaints and Dispute Resolution Management Measures

Document No.: IAPUC/IQA/ADR-2026-001

Version: 1.0

Effective Date: Pending Official Release

Formulating Institution: IAPUC Quality Accreditation Committee, International Association of Private Universities and Colleges

Applicable Scope: All higher education institutions participating in IAPUC-IQA accreditation activities, peer review experts, members of the decision-making body, and staff of the IQA Office

Preface

Fairness is not only the core value of the IAPUC-IQA accreditation system, but also the institutional cornerstone for its operation. A complete accreditation system requires not only rigorous standards and transparent procedures, but also adequate remedy channels for stakeholders. Institutions shall have the right to appeal when they have objections to accreditation decisions; any party shall have a safe channel to report violations within the accreditation system or by accredited institutions; and standardized procedures shall be available to resolve disputes arising from accreditation activities. This is the original intention of formulating these Management Measures.

IAPUC formulates these Management Measures based on three core institutional concepts. First, **procedural justice priority** — regardless of the final outcome, the review process itself must be independent, impartial and transparent to ensure that claimants are fully heard and treated seriously. Second, **full right remedy** — provide clear, accessible and time-bound remedy channels for institutions and relevant parties to avoid unaddressed rights protection or delayed relief. Third, **whistleblower protection** — establish a safe reporting environment and effective protection mechanisms to encourage bona fide reports, curb retaliatory acts, and safeguard the integrity of the accreditation ecosystem.

Built upon Chapter X "Appeals and Arbitration" of the *IAPUC-IQA Accreditation Procedure Specifications*, these Management Measures conduct systematic expansion and procedural refinement, extending the original appeal provisions into a full-function system covering appeals, complaints and dispute resolution. Together with the *IAPUC-IQA Academic Ethics and Code of Conduct* and *IQA Peer Review Expert Selection and Code of Conduct*, these Measures form an interconnected accountability and violation disposal system, constituting the right protection and integrity defense line of the IAPUC-IQA system.

Chapter I General Provisions

Article 1 Purposes and Basis

These Management Measures are formulated for the following purposes:

- (1) To provide accredited institutions with formal appeal channels for accreditation decisions and relevant disposal rulings, and safeguard their due procedural rights;
- (2) To establish a complaint, reporting and handling mechanism for suspected violations by accredited institutions, peer review experts, members of decision-making bodies and IQA staff in accreditation-related activities;
- (3) To set up consultation and mediation channels for resolving other disputes arising from accreditation activities;
- (4) To protect the legitimate rights and interests of bona fide whistleblowers and prevent and dispose of retaliatory acts;

(5) To ensure that all reviews of appeals, complaints and disputes adhere to the principles of independence, impartiality, timeliness and confidentiality.

These Management Measures are formulated based on:

- The core values and appeal mechanism framework stipulated in the *IAPUC-IQA Accreditation Manual*;
- Chapter X "Appeals and Arbitration" of the *IAPUC-IQA Accreditation Procedure Specifications*;
- Provisions on violation reporting and investigation specified in the *IAPUC-IQA Academic Ethics and Code of Conduct*;
- Provisions on expert violation disposal stipulated in the *IQA Peer Review Expert Selection and Code of Conduct*;
- Guiding principles for appeal and complaint handling specified in the *Code of Good Practice* of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

Article 2 Scope of Application

These Management Measures apply to:

(1) Appeals submitted by institutions applying for or holding valid IQA accreditation against the following decisions made by the IQA accreditation system:

- Accreditation grade decisions (including non-accreditation, provisional accreditation, formal accreditation and comprehensive accreditation) issued by the Accreditation Decision Committee (ADC);
- Decisions on suspension or revocation of the right to use the Accreditation Mark issued by the ADC or the IQA Office;
- Other formal decisions made in the accreditation process that produce substantial adverse impacts on institutions.

(2) Complaints submitted by any individual or organization regarding the following matters:

- Accredited institutions committing deliberate false statements, data falsification or other serious dishonest acts in accreditation applications, self-evaluation reports, annual reports or any materials submitted to IQA;
- Accredited institutions seriously violating the requirements of IQA accreditation standards and normative documents, where such violations may affect accreditation status or student rights and interests;
- Peer review experts violating the *IQA Peer Review Expert Selection and Code of Conduct* during the review process;
- Members of the ADC or IQA staff engaging in fraud, information leakage or other improper acts in accreditation work.

(3) Other disputes arising from accreditation activities between institutions and the

IQA system or among accredited institutions, where both parties agree to submit such disputes to this mechanism for resolution.

Article 3 Basic Principles

These Management Measures implement the following basic principles:

Principle	Core Connotation
Independent Review	Institutions and personnel responsible for reviewing appeals and complaints are independent of the original decision-making or involved institutions and individuals, and shall not be subject to any improper influence.
Procedural Justice	Reviews shall follow due procedures and guarantee the rights of all parties to fully state opinions, present evidence, cross-examine materials and know the ruling results.
Timeliness and Efficiency	All cases shall be reviewed and concluded within the prescribed time limits to avoid delayed remedy.
Confidentiality Protection	Information obtained during the review process shall be kept strictly confidential. Whistleblower information is subject to special protection to prevent retaliatory acts.
Finality and Enforceability	Rulings are final decisions within the IAPUC-IQA system and shall be observed and enforced by all parties.

Chapter II Appeals

Article 4 Scope of Appeal Acceptance

Accredited institutions may file appeals against the following matters:

- (1) Accreditation grade decisions issued by the Accreditation Decision Committee (ADC);
- (2) Decisions on non-renewal or downgrade of accreditation in expiry re-evaluation;
- (3) Decisions on suspension or revocation of the right to use the Accreditation Mark due to violations of the *IAPUC-IQA Accreditation Mark Usage and Brand Management Code*;
- (4) Other formal decisions that produce substantial adverse impacts on an institution's accreditation status or accreditation-related rights and interests.

Institutions shall not file appeals against the following matters:

- (1) Formulation and interpretation of accreditation standards — objections to the standards themselves shall be submitted through the standard revision proposal channel;
- (2) Non-substantive disputes over on-site visit schedules or review panel composition, unless such arrangements involve procedural violations or conflicts of interest that have a substantial impact on accreditation results;
- (3) Matters exceeding the appeal time limit without valid reasons for extension.

Article 5 Initiation of Appeals

- (1) Appeals shall be submitted in writing to the Appeals and Arbitration Committee within 30 working days from the date of receiving the notice of accreditation decision or disposal ruling.
- (2) The appeal letter shall specify the following contents:
 1. Name, accreditation number and contact information of the appealing institution;
 2. Specific decision subject to appeal and its issuance date;
 3. Specific grounds for appeal, corresponding to one of the following circumstances with detailed explanations and supporting evidence:
 - Procedural violations in accreditation decision-making that may have substantially affected the decision result;
 - Major factual errors in the review report on which the accreditation decision is based, which have substantially affected the decision result;
 - Undisclosed major conflicts of interest among participating decision-making body members or review experts;
 - Major omissions of evidence on which the decision is based, which have substantially affected the decision result.
 4. Appeal claims of the institution — request for revocation of the original decision, modification of the original decision or re-review;
 5. Signature of the authorized representative of the appealing institution.

Article 6 Acceptance and Review of Appeals

- (1) The Appeals and Arbitration Committee shall conduct a formal review within 10 working days upon receiving the appeal letter. Qualified appeals shall be placed on file; unqualified appeals shall be notified in writing with reasons for non-acceptance.
- (2) After case filing, the Appeals and Arbitration Committee shall set up a review panel independent of the original Peer Review Team (PRT) and Accreditation Decision Committee (ADC) members within 15 working days. The review panel shall consist of 3 members selected from committee members of the Appeals and Arbitration Committee or independent experts appointed by the Committee.
- (3) All review panel members shall sign a *Declaration of Independence and*

Confidentiality, confirming no interest connection with the original case and undertaking confidentiality obligations for all information obtained during the review process.

(4) The review panel shall perform the following duties:

1. Review all original case files, including institutional self-evaluation reports, peer review reports, institutional response opinions, and ADC decision records;
2. Provide opportunities for both the appealing institution and the original decision-making body (ADC) to submit supplementary written opinions;
3. Hear oral or remote statements from both parties when necessary and summon relevant personnel for inquiry;
4. Independently form review opinions and ruling suggestions within the framework of laws and institutional rules.

Article 7 Time Limits for Appeal Review

(1) The review panel shall complete the review work and submit the review report and ruling suggestions to the Appeals and Arbitration Committee within 60 working days after its establishment. For complex cases requiring extension, a one-time extension of no more than 30 working days may be granted upon approval by the Appeals and Arbitration Committee.

(2) The Appeals and Arbitration Committee shall issue a final ruling within 20 working days upon receiving the review report.

(3) Appeals against decisions of "non-accreditation" or "accreditation revocation" shall have suspensive effect — the original decision shall not take effect pending the appeal ruling. For appeals against other decisions, the original decision shall remain in force during the appeal period, unless the Appeals and Arbitration Committee rules to suspend execution upon application or on its own initiative.

Article 8 Appeal Rulings

(1) The Appeals and Arbitration Committee shall issue rulings by majority vote. The ruling results may include:

1. Uphold the original decision: The appeal grounds are untenable, and the original decision is maintained;
2. Revoke the original decision and remand for re-review/re-decision: The appeal grounds are valid, the original decision is revoked, and a new review or decision shall be made by personnel independent of the original review/decision team;
3. Modify the original decision: Directly adjust the original decision with sufficient and clear evidence (e.g., change non-accreditation to provisional accreditation or adjust the accreditation grade);
4. Partial maintenance and partial adjustment: Support part of the appeal claims and dismiss the rest.

(2) The written ruling shall specify the ruling result, reasons and issuance date, and shall be served on the appealing institution and the original decision-making body.

(3) The ruling of the Appeals and Arbitration Committee is the final decision within the IAPUC-IQA accreditation system, and the appealing institution shall not file a repeated appeal for the same matter.

Article 9 Appeal Fees

The appealing institution shall pay a review fee upon submission of the appeal letter. If the appeal is fully or partially upheld, the review fee shall be fully refunded; if the appeal is fully dismissed, the review fee shall not be refunded. Specific fee standards shall be published on the official IAPUC website.

Chapter III Complaints

Article 10 Scope of Complaint Acceptance

Any individual or organization (hereinafter referred to as the "complainant") may submit complaints to the IQA Office or the Appeals and Arbitration Committee regarding the following matters:

(1) Complaints against accredited institutions:

1. Deliberate false statements, data falsification or other serious dishonest acts in accreditation applications, self-evaluation reports, annual reports or any materials submitted to IQA;
2. Serious violations in the use of the Accreditation Mark that cause substantial misleading impacts on students and employers;
3. Failure to report major institutional changes in accordance with regulations during the accreditation validity period, where such changes produce actual adverse impacts on school-running quality and student rights and interests;
4. Systematic and organized academic misconduct by the institution without effective disposal;
5. Retaliatory acts against whistleblowers or dissenters in accreditation-related activities.

(2) Complaints against peer review experts:

1. Violations of the *IQA Peer Review Expert Selection and Code of Conduct* during the review process, including but not limited to failure to disclose conflicts of interest, acceptance of improper hospitality or benefits from institutions, leakage of review confidential information, and deliberate distortion of facts in reviews;
2. Serious factual errors in review reports caused by gross negligence or deliberate intent;
3. Violation of post-review communication restrictions by accepting employment or

consulting invitations from reviewed institutions within one year after completing review tasks (excluding normal academic exchanges).

(3) Complaints against ADC members or IQA staff:

1. Fraud, undisclosed conflicts of interest, information leakage or other improper acts in accreditation decision-making and management work;
2. Improper treatment or retaliatory acts against accredited institutions or complainants.

Article 11 Initiation of Complaints

(1) Complaints shall be submitted in writing. Upon approval by the IQA Office under special circumstances, complaints may be submitted via recordable methods such as audio and video recordings. Complaints may be real-name or anonymous. Anonymous complaints shall provide reasonable preliminary evidence; otherwise, the accepting authority may decline to place the case on file.

(2) A complaint letter shall include the following contents as far as possible:

1. Name and contact information of the complainant (excluded for anonymous complaints);
2. Name of the complained party;
3. Detailed description of the complaint matter, including the time, location, specific acts and relevant evidence or clues;
4. Signature or equivalent electronic confirmation of the complainant (excluded for anonymous complaints).

(3) Complainants shall submit complaints in good faith. Malicious false accusations and fabricated facts, once verified, will result in IAPUC's pursuit of corresponding liabilities, and internal personnel of the accreditation system will be disposed of in accordance with relevant norms.

Article 12 Acceptance and Preliminary Review of Complaints

(1) The IQA Office is the authority for accepting complaints. Complaints involving the IQA Office itself or its staff shall be directly accepted by the Appeals and Arbitration Committee.

(2) The IQA Office shall complete a preliminary review within 15 working days upon receiving a complaint to verify the following matters:

1. Whether the complaint matter falls within the acceptance scope specified in these Management Measures;
2. Whether the complaint provides reasonable grounds and preliminary evidence to initiate an investigation;
3. Whether the complaint is a repeated submission of the same matter without new

evidence.

(3) After the preliminary review, the IQA Office shall make one of the following decisions:

1. File for investigation: The complaint matter is within the acceptance scope with reasonable grounds, and a formal investigation procedure is initiated;
2. Decline filing: The complaint matter is outside the acceptance scope, lacks reasonable grounds or preliminary evidence. Real-name complainants shall be notified in writing with reasons for non-acceptance;
3. Referral handling: The complaint matter is outside the scope of these Measures but falls under the jurisdiction of other IAPUC mechanisms or is suitable for prior handling via internal institutional mechanisms. The complainant shall be informed of the referral channels in writing.

(4) Complainants may apply to the Appeals and Arbitration Committee for a review of the IQA Office's preliminary review decision within 15 working days upon receiving the non-filing decision.

Article 13 Complaint Investigation

(1) After case filing, the IQA Office or the Appeals and Arbitration Committee shall set up an investigation team consisting of no fewer than 2 interest-independent professionals.

(2) The investigation team shall perform the following duties:

1. Collect and review documents, records and evidence related to the complaint matter;
2. Interview complainants, complained parties and relevant witnesses, and grant all parties full opportunities to state opinions and provide evidence;
3. Consult independent expert opinions on professional and technical issues when necessary;
4. Compile an investigation report specifying investigation findings and disposal recommendations upon completion of the investigation.

(3) The investigation shall protect the due procedural rights of complainants and complained parties:

1. The complained party has the right to be informed of the alleged charges (not necessarily including the complainant's identity information in cases of anonymous complaints or whistleblower protection) and to provide written explanations and evidence within a reasonable time limit;
2. Evidence and statements submitted by all parties shall be treated prudently and impartially.

(4) The investigation shall be completed within 90 working days after case filing. For complex cases requiring extension, a one-time extension of no more than 45 working

days may be granted upon approval by the Appeals and Arbitration Committee.

Article 14 Complaint Handling Decisions

(1) Upon completing the investigation report, the investigation team shall submit it to the competent authority for decision-making:

1. Complaints against accredited institutions: The IQA Office shall submit the investigation report to the Accreditation Decision Committee (ADC), which shall issue a handling decision within 30 working days upon receipt;
2. Complaints against peer review experts: The IQA Office shall issue handling decisions in accordance with the *IQA Peer Review Expert Selection and Code of Conduct*;
3. Complaints against ADC members: The Appeals and Arbitration Committee shall directly issue handling decisions;
4. Complaints against IQA Office staff: The IAPUC Board of Directors shall issue handling decisions.

(2) The handling decisions may include:

1. Dismiss the complaint as untenable;
2. Uphold the complaint and impose corresponding disposal measures on the complained party in accordance with the provisions of relevant normative documents (including but not limited to the *IQA Peer Review Expert Selection and Code of Conduct* and *IAPUC-IQA Accreditation Mark Usage and Brand Management Code*);
3. Partially uphold the complaint and adopt corresponding disposal measures for the valid parts.

(3) The handling decision shall be served on real-name complainants and complained parties in writing. The written decision shall specify the handling results and brief reasons while complying with confidentiality requirements and protecting restricted information.

(4) Real-name complainants dissatisfied with the handling decision may submit one review application to the Appeals and Arbitration Committee within 30 working days upon receiving the decision. The review ruling is final.

Article 15 Whistleblower Protection

(1) IAPUC strictly protects the legitimate rights and interests of bona fide whistleblowers.

(2) Protection measures include:

1. Strict confidentiality of real-name whistleblowers' identity information; no disclosure to any third party including the complained party without the written consent of the whistleblower;
2. Disclosure of whistleblower identity information only within the necessary scope of

the investigation team during the investigation, with all relevant personnel signing confidentiality commitments;

3. Strict prohibition of any form of retaliation or adverse treatment against whistleblowers by the complained party or any other person due to whistleblowing acts.

(3) Any person who suffers retaliation due to bona fide whistleblowing or investigation cooperation may apply for protection through the complaint channels specified in these Measures. Verified retaliatory acts will result in serious sanctions against the institutional or individual perpetrators based on circumstances, including but not limited to written condemnation, notification to institutional governing bodies, suspension of accreditation-related rights, and recommendation for removal from post.

(4) Malicious false accusers are not entitled to the protection provisions of this Article. IAPUC will pursue corresponding liabilities for verified malicious false accusations.

Chapter IV Dispute Resolution

Article 16 Scope of Dispute Resolution

Except for appeal and complaint matters, other disputes arising from accreditation activities between institutions and the IQA system or among accredited institutions may be submitted to this dispute resolution mechanism upon mutual consent of both parties. Such disputes include but are not limited to:

(1) Disputes over accreditation fees and refunds;

(2) Disputes over improper treatment of institutions during the review process that do not constitute formal appeal matters;

(3) Disputes among accredited institutions arising from the use of Accreditation Marks or representation of accreditation status;

(4) Other accreditation-related disputes submitted upon mutual consent of all parties.

Article 17 Consultation and Mediation

(1) All parties to a dispute shall first conduct direct consultation in good faith and cooperation to reach mutually acceptable solutions.

(2) If consultation fails, any party may apply to the Appeals and Arbitration Committee for mediation in writing, specifying the dispute matter, consultation process and mediation claims.

(3) The Appeals and Arbitration Committee shall decide on case acceptance within 15 working days upon receiving the mediation application. If accepted, one or more interest-independent committee members or independent experts will be appointed as mediators.

(4) Mediation shall follow the principles of voluntariness, confidentiality and non-

confrontation. Mediators shall propose non-binding settlement suggestions after understanding the positions of all parties. A written settlement agreement shall be signed and performed voluntarily by all parties if a consensus is reached.

(5) If mediation fails, any party reserves the right to resolve the dispute through other legal channels after the termination of mediation.

Article 18 Connection between Mediation and Ruling

If a dispute matter identified during mediation falls within the scope of appeal or complaint acceptance specified in these Measures, the mediator shall refer the matter to the corresponding appeal or complaint procedure, and the mediation may be suspended pending the final ruling result.

Chapter V Supplementary Provisions

Article 19 Filing and Archiving

(1) All case materials of appeals, complaints and dispute resolution, including application documents, investigation reports, rulings and settlement agreements, shall be uniformly archived and preserved by the IQA Office.

(2) Case files shall be retained for at least 10 years after case closure. Upon expiration, files shall be disposed of in accordance with the *IQA Accreditation Archive and Data Retention Management Rules*.

Article 20 Relationship with Other Normative Documents

These Management Measures form a unified IAPUC-IQA normative system with the following documents, serving as mutual basis and supplement:

Document	Relationship with These Management Measures
<i>IAPUC-IQA Accreditation Procedure Specifications</i>	These Measures comprehensively expand and refine the procedures of Chapter X "Appeals and Arbitration" of the Procedure Specifications
<i>IQA Peer Review Expert Selection and Code of Conduct</i>	Disposal classification for expert violation complaints follows the Code, while investigation procedures are governed by these Measures
<i>IAPUC-IQA Accreditation Mark Usage and Brand Management Code</i>	Appeals against disposal of Mark usage violations are governed by these Measures

<i>IAPUC-IQA Academic Ethics and Code of Conduct</i>	Reporting channels and investigation principles for academic and ethical violations are aligned with these Measures
--	---

Article 21 Term Definitions

Term	Definition
Appeal	A formal remedy procedure through which accredited institutions raise objections to adverse decisions made by the accreditation system and request re-review
Complaint	Reports submitted by any individual or organization to the accreditation system regarding suspected violations in accreditation-related activities
Dispute	Other differences of opinion or conflicts of interest arising from accreditation activities, excluding appeal and complaint matters
Appeals and Arbitration Committee	An independent specialized body established by IAPUC responsible for hearing appeals, complaints and disputes
Bona Fide Report	Reports submitted by whistleblowers based on reasonable beliefs and honest motives, which shall not be deemed malicious even if the final investigation result does not fully support the report content

Article 22 Interpretation and Revision of These Measures

(1) These Management Measures shall be interpreted by the IAPUC Quality Accreditation Committee.

(2) Revision of these Management Measures shall be subject to approval by the IAPUC Council.

Article 23 Effective Date and Transitional Arrangements

These Management Measures shall take effect upon approval by the IAPUC Council. All pending appeal and complaint cases at the time of implementation shall be continued and reviewed in accordance with the procedures stipulated in these Measures.

Appendix A: Appeal Letter Template

An appeal letter shall include the following contents:

1. Basic information of the appealing institution
2. Specific decision subject to appeal (attached with a copy of the decision letter)
3. Appeal grounds (itemized explanations and supporting evidence corresponding to the circumstances specified in Article 5)
4. Appeal claims
5. Signature of the authorized representative
6. List of attachments

Appendix B: Complaint Letter Template

A complaint letter shall include the following contents:

1. Complainant information (for real-name complaints)
2. Information of the complained party
3. Detailed description of the complaint matter
4. List of evidence or clues
5. Signature of the complainant (for real-name complaints)

Document Approval

Role	Name/Position	Date
Compiled by	Legal and Procedural Standards Working Group, IAPUC Quality Accreditation Committee	May 2026
Reviewed by	IAPUC Quality Accreditation Committee	Pending
Approved by	IAPUC Council	Pending

Copyright Statement

The intellectual property rights of this document and the *IQA Accreditation Appeals, Complaints and Dispute Resolution Management Measures* contained herein belong to the International Association of Private Universities and Colleges (IAPUC). Without

written authorization from IAPUC, no institution or individual may copy, modify or use this document for commercial purposes. Accredited institutions and relevant parties may freely use this document for the purpose of understanding their rights and obligations.