



Comments and Complaints Policy

Version 6.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	April 2020	April 2021	First Policy.
2.0	Rena Panesar	April 2021	April 2022	Updated.
3.0	Rena Panesar	April 2022	April 2023	Updated.
4.0	Rena Panesar	April 2023	April 2024	Updated.
5.0	Rena Panesar	April 2024	April 2025	Updated.
6.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated.



Introduction and Purpose

Pathways LDN is committed to maintaining a positive, professional, and high-quality training environment.

We sincerely hope that there will never be the need to complain about our services, but in the unlikely event, any complaints will be dealt with in a friendly, warm, and professional manner.

Beyond complaints, we welcome all feedback on what we are doing, whether it be related to what we are good at or could improve on, who or what is adding value or letting us down, what you would like to see more or less of or general feedback on how we can continuously improve.

This policy aims to provide all stakeholders with a means to make a complaint or provide other feedback and outlines how we manage such information.

Who and what this policy applies to

This policy applies to all stakeholders of Pathways LDN, including:

- Current and prospective Learners (including apprentices) and their parents/carers.
- Employers.
- Partners.
- Visitors and other members of the general public.

It covers complaints about our services, including the quality of training, staff conduct, adherence to policies (e.g., safeguarding, equality), and financial propriety related to DfE/ESFA-funded provision.

Definitions

A **complaint** is any expression of dissatisfaction which requires a response.

A **complainant** is a person making the complaint, whether on behalf of themselves or another.



Roles and Responsibilities

Directors

- To oversee the complaints process and ensure fair application.
- To review escalated or serious complaints.
- To refer complaints to our regulators, funders, the authorities, etc., as appropriate.
- To ensure lessons learned from complaints are implemented.

Managers

- To handle complaints at a local level wherever possible.
- To escalate safeguarding, serious, or unresolved complaints to the Directors.
- To ensure staff and umpires understand and comply with this policy.

Safeguarding Lead

- To take the lead on any complaints involving safeguarding or welfare concerns.
- To liaise with external safeguarding bodies (e.g., local authority) when appropriate.

All Staff

- To respond to complaints in a respectful, constructive, and professional manner.
- To report complaints promptly to their manager, a Director or the Safeguarding Lead.



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Policy

Core Principles

All feedback and complaints will be managed according to the following principles:

Transparency: The policy and process are clear and easily accessible to all stakeholders.

Fairness: All parties involved, including the complainant and the respondent, will be treated with impartiality, courtesy, and respect.

Confidentiality: All details will be kept confidential, shared only on a strict "need-to-know" basis for the purpose of investigation.

Support First: Complainants will be provided with information on how to access independent advocacy services, particularly where the complainant is a vulnerable adult or a young person.

Complaining on Behalf of Another (Third-Party Complaints)

Pathways LDN recognises that some individuals may need support to raise a complaint due to age, disability, or capacity. We are committed to ensuring that the voice of every learner, including the most vulnerable, is heard and acted upon.

A complaint may be submitted by a third party on behalf of a learner if the learner:

- **Is a Minor:** The learner is under the age of 18 (a minor or child) and the complaint is submitted by a **parent, legal guardian, or carer**.
- **Lacks Capacity:** The learner is unable to complain themselves due to a lack of mental capacity or a significant disability. In this case, the complaint may be raised by an individual legally authorised to act on their behalf (such as someone with a **Lasting Power of Attorney**), or by a person with a close connection and a legitimate interest in their welfare.
- **Is Deceased:** A complaint can be made by a relative or someone in a close personal relationship with the learner at the time of their death.

To protect the privacy and rights of the learner, the third party must provide the following written evidence when submitting a formal complaint:



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1. Written consent from the learner authorising the third party to act and to receive confidential information regarding the investigation (unless the learner is deceased or lacks capacity).
2. If consent cannot be provided (due to lack of capacity or age), the third party must clearly state their relationship to the learner and the justification for acting on their behalf (e.g., parental relationship, legal guardianship, or specific evidence demonstrating a legitimate interest in the learner's welfare).

We will treat third-party complaints with the same rigour, confidentiality, and commitment to fair investigation as a direct complaint.

Access to Advocacy Support

Pathways LDN recognises that navigating the complexities of a complaint or formal process can be challenging, particularly for young people, those with learning difficulties, or individuals with mental health concerns.

We believe learners should feel empowered and supported throughout any procedure, and therefore, we will ensure that all individuals are aware of their right to access independent advocacy. An advocate is an independent professional who can help the learner understand their rights, articulate their concerns clearly, gather evidence, and accompany them to meetings with staff or management.

We will proactively provide all learners, upon request or at the start of any formal procedure, with clear information and contact details for relevant, independent advocacy services that can assist them. This ensures that the learner is not alone and has access to impartial guidance.

Reasonable Adjustments

Any complainant or companion who requires a reasonable adjustment to access this policy or participate in the complaints procedure will be accommodated, where practicable, by implementing reasonable adjustments.

This policy may be provided in other, more accessible formats on request.



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Being Accompanied at Formal Meetings

At all formal meetings, complainants are entitled to be accompanied by a companion. This companion may support them and speak on their behalf if they wish.

Data Protection

All complaint-related personal and special category data will be stored securely (in secure Google Drive folders) and only accessible to those with a legitimate need-to-know.

Where a complaint is made by a minor or vulnerable adult, we would ask for their consent before sharing their information with their parents/guardians or other third parties unless there were good reasons not to (e.g. we have a lawful basis – see our Safeguarding Policy, Data Protection and GDPR Policy and Learner Privacy Notice for further information).

Recurring or Vexatious Complaints

Whilst we are committed to resolving any genuine issues that arise, we must be clear that repeat complaints about the same issue (that have been fully investigated and deemed resolved by us) will not be reinvestigated or reheard unless circumstances have changed.

In addition, complaints that are deemed vexatious will not be pursued.

The complainant will be notified of this decision in writing within 2 working days.

Non-Retaliation

Pathways LDN will not tolerate the victimisation of anyone who makes a complaint in good faith.



Complaints Procedure

Informal Resolution (Stage 1)

We encourage resolving issues informally at the earliest opportunity.

- Minor Concerns should first be raised directly with the Tutor, Mentor, or immediate Service Manager.
- Where an error is acknowledged, a sincere apology will be provided, and practical steps will be taken immediately to rectify the issue.

Formal Complaint (Stage 2)

If informal resolution fails or the issue is serious, a formal complaint must be submitted. Complaints should ideally be raised within three months of the incident occurring.

- Wherever possible, complaints must be made in writing to a Director. However, Pathways LDN recognises that not everyone will be able to submit a written complaint. Therefore:
 - Complaints made in person or via phone are equally valid.
 - Where needed, staff will offer to help the complainant write down their concerns accurately and ensure the written record reflects their words.
- Complainants are asked to include as much information as possible in their complaint, for example:
 - A detailed description of the incident or issue that led to the complaint.
 - The names of any staff members or others involved.
 - The date, time, and address (if relevant) associated with the incident or issue.
- An acknowledgement will be sent within 2 working days.
- A Director will investigate the complaint, which may involve reviewing records, speaking to relevant staff, and meeting the complainant. A record of any investigation, as well as a record of its outcome, will be maintained.
- A written response will be provided as soon as possible and within 20 working days, setting out findings, conclusions, and any actions to be taken.



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- The final response will detail:
 - The findings of the investigation (whether the complaint was upheld or not)
 - An unreserved apology if the complaint is upheld.
 - The specific actions taken or changes implemented to prevent a recurrence.
- In some instances, a complaint may not be upheld if it is found to be unsubstantiated, leading to no further action. However, the process may still yield insights leading to improvements or preventive measures, which will be addressed as appropriate.

Our Contact Details – Where to Formally Complain

Email: paul@pathwaysldnld.com

Postal Address: Belmont Building, Belmont Road, Uxbridge, Greater London, England, UB8 1HE

Telephone: 07508114160

External Escalation and Appeals (Stage 3)

Once a learner has exhausted the internal complaints process at Pathways LDN and they remain dissatisfied with the final written outcome, they have the right to escalate their complaint to an appropriate independent external body. The relevant external body depends entirely on the nature and funding source of the training programme, but may include:

- Learners may escalate complaints concerning the quality of training, breaches of funding rules, or financial impropriety directly to the **Department for Education (DfE)/Education and Skills Funding Agency (ESFA)** via their official complaints procedure.
- Apprentices have the option of raising concerns about the quality of their training directly through the official **Apprenticeship Helpline**.
- If the training or programme was funded or commissioned by a Local Authority (e.g., through Adult Education Budget contracts or similar local schemes), the complaint may be referred to the **Local Government & Social Care Ombudsman** for independent investigation.

Learners will be provided with the appropriate contact details for the relevant external body in the final outcome letter issued by Pathways LDN.



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Onward Referral of Serious Complaints

Pathways LDN reserves the right to refer serious complaints directly to external regulatory bodies or law enforcement where the nature of the allegation falls outside the organisation's direct authority or poses a significant risk to individuals or public funds. This ensures compliance with all legal and safeguarding duties. The Directors will lead the referral process, passing the matter onto the appropriate external authority:

- A serious safeguarding complaint will be **referred immediately to the Local Authority Children's Social Care** and the police.
- A serious complaint regarding fraud, financial malpractice, or misuse of DfE/ESFA funding will be referred directly to the **DfE/ESFA** via their official complaints channel.
- Allegations involving serious crimes will be reported to the **Police** and/or the **Information Commissioner's Office (ICO)**.
- A complaint regarding a major breach of contract or safety standards by an employer will be escalated to the appropriate **governing body** or **regulatory authority** for that sector.

Note: In such cases, our internal investigation may be paused to allow statutory authorities to lead.

Matters Outside the Scope of This Policy

Pathways LDN is committed to helping resolve issues that directly affect a learner's training, welfare, and experience of our programs. However, there are some matters that we cannot assist with. For example:

- Where an apprentice's complaint relates to their employer's internal policy or procedure, and there is no wrongdoing on the employer's behalf.
- Where the complaint relates to personal disagreements, feuds, or conflicts with other individuals (e.g., other learners) and does not involve bullying/harassment or an immediate safeguarding risk.

In these situations, Pathways LDN will offer initial guidance and refer the individual to the correct external body or legal professional for assistance.



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Whistleblowing and Grievances

Pathways LDN provides distinct but overlapping channels for staff to raise workplace concerns, internal complaints, and instances of serious malpractice, ensuring every issue can be addressed appropriately and safely.

- Concerns relating to a staff member's own employment, working conditions, relationships with colleagues, etc., should be raised directly through the **Grievance Policy and Procedure**.
- Our **Whistleblowing Policy** is reserved for concerns of wrongdoing raised by staff that are in the public interest, such as suspected financial crime, failure to comply with a legal obligation, danger to safety, or misuse of public funds (like DfE/ESFA grants).

In cases where a staff member is unsure which policy applies, they are encouraged to contact a Director, who will direct them to the appropriate mechanism.

Monitoring

All complaints and feedback received will be logged, reviewed (at least every 6 months), and used as a tool for continuous improvement.

This data will inform staff training, policy reviews, and strategic planning to ensure Pathways LDN consistently delivers high-quality, professional, and ethical services.

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.