

# Complaints Policy

---



Wales Safeguarding Procedures

The Independent School Standards (Wales) Regulations 2024

Additional Learning Needs and Education Tribunal (Wales) Act 2018

**Valid until March 2029**

## **Policy**

The school is committed to fostering a culture in which concerns and complaints are recognised as an important part of listening to pupils, families and stakeholders, and of improving the quality of education and care. The school actively encourages open communication and seeks to ensure that all members of the school community feel confident that their views will be taken seriously and acted upon appropriately.

In line with Pathways-2-the-Futures expectations, leaders ensure that the complaints process is not simply procedural, but contributes meaningfully to self-evaluation and school improvement. Particular emphasis is placed on ensuring that pupils with additional learning needs, including autism and learning disabilities, are supported effectively to express dissatisfaction in ways that reflect their communication profiles. This includes recognising that behaviour, withdrawal or distress may represent a complaint and must be explored sensitively.

## **Complaint**

A complaint is understood as any expression of dissatisfaction about the school's provision, whether expressed directly or indirectly. In a specialist setting such as this, where pupils may have complex communication needs, it is essential that staff interpret a wide range of behaviours and expressions as potential indicators of dissatisfaction.

For example, a pupil may communicate discomfort or disagreement through changes in behaviour, increased anxiety, disengagement from learning, or through alternative communication systems such as symbols or assistive technology. Staff are trained to recognise these as meaningful forms of communication and to respond with curiosity and care rather than assumption.

Complaints may relate to any aspect of the school's work, including educational provision, the implementation of Individual Development Plans, relationships with staff, the school environment, or wider aspects of wellbeing and support. The school does not restrict the scope of complaints and recognises that concerns may evolve over time.

## **Principles**

The school places the child at the centre of the process, ensuring that pupils are supported to participate in a way that is meaningful to them. This may involve adapting communication methods, providing additional time, or involving a trusted adult or advocate.

Accessibility is a central consideration. Information about how to make a complaint is provided in formats that are suitable for the school's pupil cohort, including simplified language, visual supports and verbal explanation. Families are also provided with clear guidance so that they understand how concerns will be managed.

The school is committed to resolving concerns at the earliest possible stage. Staff are encouraged to respond proactively and constructively to issues as they arise, while recognising when a matter requires

formal investigation. Throughout the process, fairness and transparency are maintained. Decisions are evidence-based, and complainants are kept informed of progress and outcomes.

Importantly, the school maintains a culture in which raising concerns is viewed positively. Individuals who make complaints are treated with respect and are not subject to any form of disadvantage. Safeguarding considerations remain paramount at all times, and any concern relating to the welfare of a child is addressed immediately through safeguarding procedures.

## **Making a Complaint**

Complaints may be made in a variety of ways, reflecting the needs of the school community. A concern may be raised verbally, in writing, through alternative communication systems, or via a representative. The school recognises that some individuals may find it difficult to articulate concerns formally, and therefore places emphasis on listening carefully and responding appropriately in all situations.

Pupils are supported to raise concerns through their relationships with staff, through structured opportunities such as review meetings, and through access to advocacy where appropriate. Parents and carers are encouraged to communicate openly with the school and are reassured that concerns will be handled sensitively and professionally.

## **Process**

The school adopts a staged approach to complaints, ensuring both flexibility and adherence to policies and procedures.

### **First Stage – Informal**

- Where concerns can be resolved informally, staff will seek to do so promptly, usually within five school days.
- This stage focuses on dialogue, understanding and early resolution, and is an important part of maintaining positive relationships.

### **Second Stage – Formal Hearing**

- Where a matter cannot be resolved informally, it becomes a formal complaint. At this point, the school acknowledges the complaint in writing and appoints an appropriate member of staff to carry out a thorough investigation. This will involve gathering relevant information, speaking to those involved, and ensuring that the views of the pupil/ person are captured in a way that reflects their communication needs and potential outcomes.
- The outcome of the investigation is provided in writing, usually within twenty school days, and includes clear reasoning and any actions to be taken.
- Possible complaint outcomes:
  - Upheld - there is evidence to support the complaint.
  - Partially Upheld - there is evidence to support aspects of the complaint.
  - Not Upheld - there is no evidence to support the complaint.

### **Third Stage – Appeal of Formal Hearing**

- If the complainant remains dissatisfied, the complaint may be escalated to a third stage, which involves an independent review. This stage is a key requirement of The Independent School Standards (Wales) Regulations 2024. The review is conducted by individuals (usually the Proprietor) who has not been involved in the original investigation and includes two other

people including one independent person. The process is conducted fairly and transparently, with the complainant given the opportunity to present their case. A final decision is issued following this review with reports sent to all involved.

### **Final Stage – External escalation**

- Where concerns remain unresolved after this stage, the complainant may choose to refer the matter to an external body such as the Local authority (for EHCP complaints) and Welsh Government. The school will provide information and support to enable access to these routes.

Initial written complaints can be emailed to:

- Aimee Burton - Head Teacher - [head.somersault@pathways-2-the-future.co.uk](mailto:head.somersault@pathways-2-the-future.co.uk).

If the complaint relates to the Head Teacher, then they should be sent to:

- Rachel Ellacott, Proprietor at [rachel.ellacott@pathways-2-the-future.co.uk](mailto:rachel.ellacott@pathways-2-the-future.co.uk).

They may be made anonymously or in person, verbally or in writing. If alternative communication methods are needed to submit complaints, then contact is be made to Rachel Ellacott, Proprietor - 07816398412.

### **Safeguarding Considerations**

The school recognises that some complaints may raise safeguarding concerns. In such cases, the matter is immediately referred to the Designated Safeguarding Person and managed in accordance with safeguarding procedures:

- Aimee Burton - Head Teacher - [head.somersault@pathways-2-the-future.co.uk](mailto:head.somersault@pathways-2-the-future.co.uk).
- Rachel Ellacott, Proprietor at [rachel.ellacott@pathways-2-the-future.co.uk](mailto:rachel.ellacott@pathways-2-the-future.co.uk).

This process may then involve external agencies, including social services or the police. The complaints process does not replace safeguarding responsibilities, and in all cases the welfare of the child is the primary consideration.

### **Legal Intervention**

Where it is immediately apparent that the complaint is to be referred, by the complainant, to a Solicitor, the internal complaints process is immediately compromised. If such a situation arises, either at the outset, or during the complaints procedure, then the complainant will be informed that the complaints procedure is no longer in operation, and that the matter is to be immediately referred to Solicitors and/or Insurers who represent the interests of the school.

### **Disciplinary Action**

Pathways 2 the Future Ltd have employment policies in place designed to deal with allegations of abuse and/or discrimination. If, during any investigation into a complaint made by a young person, it becomes apparent that some form of disciplinary action is to be taken against an employee of the school, this will be taken in accordance with the most appropriate and relevant policy. The complainant will be informed of such action.

## **Disciplinary and Grievance processes**

Complaints against the Head Teacher will be referred directly to the Proprietor who will make the necessary arrangements to ensure an appropriate, open and transparent investigation.

## **Complaints from Outside**

Where complaints are made from outside of the company then they must be referred immediately to the Head Teacher, who will contact the complainant and confirm the nature/seriousness of the complaint. Where necessary an investigation will be undertaken by the Headteacher or his/her nominee.

## **Recording, Monitoring and Use of Information**

Accurate and detailed records of complaints are maintained in a central register. These records include the nature of the complaint, the actions taken, the outcome, and the timescales involved.

The Proprietor will review complaint information regularly in order to identify patterns or recurring themes. This analysis forms part of the school's self-evaluation processes and contributes directly to improvement planning. For example, repeated concerns about a particular aspect of provision may lead to changes in practice, additional staff training, or revisions to policy.

The school will ensure that there is clear evidence of how feedback, including complaints, leads to tangible changes in provision and improved outcomes for pupils.

## **Confidentiality and Professional Conduct**

All complaints are handled with appropriate sensitivity. Information is shared only with those who need to be involved in the investigation, and records are stored securely. Staff are expected to maintain professionalism throughout the process, ensuring that all parties are treated with dignity and respect.

## **Review of Policy**

This policy is reviewed annually, or sooner if required by changes in legislation or following significant incidents or inspection findings. The review process includes consideration of feedback from pupils, families and staff, ensuring that the policy remains effective and relevant to the needs of the school community.

## **Linked Policies and Guidance**

- Safeguarding Policy
- Whistleblowing Policy