Complaints Policy

APRIL WELL LIMITED — Company No. 11924473

Registered office: Unit 39c St Olavs Court Business Center, Lower Road, London, England, SE16 2XB

Director / Legal Representative: Xiaoying Chi

Designated Safeguarding Lead (DSL): Xiaoying Chi

(Deputy DSL: n/a – temporarily covered by the DSL)

24/7 emergency: 07930416543

Email: info@aprilwell.co.uk

This policy is publicly available. It may be shared with parents, agents, partner schools and inspectors on request.

Document Control

Title: Complaints Policy

Owner: Xiaoying Chi, Director / DSL

Approved by: Xiaoying Chi

Document ID: AWP-CP-02

Version: v2.0 (21 October 2026)

Issue date: 21 October 2026

Next review: 21 October 2027 *(or earlier if law/policy changes)*

Status: Public

Distribution: Company website; Student/Parent Handbooks; provided to schools and inspectors on request.

This document is reviewed at least annually in October and whenever statutory guidance, safeguarding requirements or AEGIS Standards change. This revision reflects the AEGIS Quality Standards, September 2026, including Standards 7.1–7.3.

Table of Contents

Policy Statement *1*

Complaints Procedure *2*

Stage 1: Informal Stage **2**

Stage 2: Formal Stage **2**

Stage 3: Referral of the matter to AEGIS **3**

Repetitious, Vexatious and Unreasonable Complaints *3*

Review *4*

Policy Statement

April Well Limited recognises that there may be legitimate concerns or complaints from students, staff, schools, parents or homestays relating to April Well Limited. As a company we encourage these concerns or complaints to be made known to April Well Limited staff so that they can be addressed in partnership with us and we can continuously improve our service. Safeguarding concerns must be reported immediately under our Safeguarding and Child Protection Policy, without waiting for these complaint stages or deadlines. Call 999 in immediate danger. Where the DSL cannot be contacted, or the concern relates to the Director/DSL's own conduct, contact the relevant Local Authority Designated Officer (LADO), police or children's social care directly as appropriate; do not rely on reporting to the person concerned.

At April Well Limited we:

• take all concerns and complaints seriously;

• make every effort to deal with concerns or complaints informally and at an early stage;

• aim to resolve formal complaints within 28 working days of receipt of the formal complaint. Timeframes are detailed at each stage of this policy; however, under circumstances in which the complaints are unusually complex or complicated, timeframes may be extended in order to complete a thorough investigation;

• ensure that complaints are dealt with in line with the procedures set out in this document;

• make reasonable adjustments for complainants who need support, such as accessible formats or meeting locations;

• make a copy of this policy and procedures available on our website at https://aprilwell.co.uk/policy;

• ensure that complaints are resolved either to the complainant's satisfaction or with an otherwise appropriate outcome;

• ensure that, where appropriate, a full and fair investigation of the issue is undertaken;

• ensure that no one, including students, is penalised for making a complaint in good faith;

• keep a written record, for at least three years, of all complaints, the action taken and at what stage they were resolved. Longer retention will apply where required for safeguarding, legal proceedings or a documented retention requirement;

• review regularly at senior management level the written record of complaints and their outcomes; and

• keep complaint records securely and confidentially, with access limited to those who need it and necessary, lawful disclosure to AEGIS or statutory agencies.

A record of formal complaints and their outcomes is kept by the Director (who also acts as Designated Safeguarding Lead) in secure electronic copy, regardless of whether they were upheld. The record includes the action taken and resolution stage. Complaints about the Director follow Stage 3; the Director must not investigate or decide a complaint about their own conduct. For those complaints, records follow the receiving body's procedures and lawful directions.

Complaints Procedure

Stage 1: Informal Stage

It is hoped that most concerns or complaints can be resolved informally. A concern or complaint can be made in person, in writing or by telephone. They may also be made by a third party acting on behalf of a complainant, as long as they have appropriate consent to do so. Working days are Monday to Friday, excluding public holidays in England. These working-day limits do not delay safeguarding or emergency action.

In the first instance, concerns should normally be raised with the relevant April Well Limited staff member. They will:

• keep a brief record of the concern or complaint and any action taken;

• acknowledge and respond to the complainant within 24 hours (Monday to Friday, UK time);

• investigate the concern or complaint; and

• report back to the complainant within 5 working days, either with a resolution or with an explanation of next steps.

If the issue remains unresolved, or if the complainant does not feel comfortable raising the matter informally, the next step is to make a formal complaint under Stage 2.

Stage 2: Formal Stage

If the complainant is not satisfied with how the complaint has been handled at Stage 1, or if they prefer to raise the matter formally from the outset, they can make a formal complaint.

Except where the complaint concerns the Director or there is a conflict of interest (see Stage 3), formal complaints should be sent in writing, by email or letter, to the Director. Help with putting a complaint in writing is available:

Director: Xiaoying Chi

Email: info@aprilwell.co.uk

Postal address: April Well Limited, Unit 39c, St Olavs Court Business Center, Lower Road, London, SE16 2XB

For complaints handled at Stage 2, the Director will:

• keep a record of the complaint and any action taken;

• acknowledge receipt of the complaint within 24 hours (Monday to Friday, UK time);

• investigate the concern or complaint – this may take some time, but in any event the complainant will be kept informed of progress;

• report back to the complainant formally in writing no later than 28 working days from receipt of the formal complaint (unless the case is unusually complex and a longer timescale is agreed with the complainant).

If the complaint is about the Director, or the complainant does not feel able to raise it with the Director, they may contact AEGIS directly under Stage 3. The Director will not lead the independent consideration of a complaint about their own conduct and will cooperate with the receiving body. Safeguarding concerns must use the immediate external reporting route above.

Stage 3: Referral of the matter to AEGIS

If complainants are not satisfied with the outcome as decided by April Well Limited at Stage 2, they can contact AEGIS to report their concerns. AEGIS applies its own current complaints procedure and timescales. April Well Limited must notify AEGIS within 1 working day of complaints or investigations that may damage AEGIS's reputation, and self-report significant safeguarding concerns, compromising or potentially misconstrued situations, and behaviour below expected standards without waiting for the internal outcome. Relevant contact details are set out below:

Yasemin Wigglesworth
Chief Executive Officer, Association for the Education and Guardianship of International Students (AEGIS)
The Wheelhouse,
Bond's Mill Estate,
Bristol Road,
Stonehouse,
Gloucestershire,
GL10 3RF
+44 (0) 1453 821293; Email: info@aegisuk.net
https://aegisuk.net/policies/

Repetitious, Vexatious and Unreasonable Complaints

In rare cases, we may deviate from our usual Complaints procedure (as outlined above). This includes:

Repetitious Complaints

If a complaint has already been fully addressed and a clear response provided, the complainant will be informed in writing that the process is complete, and no further engagement will occur. This applies to repeated points only; material new information, safeguarding concerns and referral to Stage 3 remain available.

Vexatious Complaints

A complaint may be deemed vexatious if it is:

- Persistent, obsessive, or harassing
- Unrealistic or unreasonable in its demands
- Designed to cause disruption or annoyance

Examples include refusing to co-operate, changing the complaint repeatedly, making excessive demands, or spreading false information. In such cases, further engagement may be refused. Persistence, criticism or a complaint not being upheld does not alone make it vexatious; any restriction must be based on the conduct and be proportionate.

Unreasonable Conduct

If a complainant behaves in an aggressive, abusive, offensive, or threatening manner, the following actions may be taken:

- Inform the complainant that their pursuit of the complaint is unreasonable and request that they stop.
- Handle the complaint without a hearing.
- Refuse to consider the complaint further.

Additionally, contact may be restricted, such as limiting communication to letters or a named person. If their behaviour poses a serious threat, the police may be involved, or legal action may be taken without prior warning. Restrictions must be proportionate and explained in writing; they must not prevent safeguarding reports, consideration of material new information or referral to AEGIS.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 21/10/2026

Signed: 

Name: Xiaoying Chi

Role: Director and Designated Safeguarding Lead (DSL)

Date: 21/10/2026