Complaints Policy

Policy Created: June 2023

Last Reviewed: February 2026

Next Review: February 2027 (or sooner if significant changes in legislation, guidance, or organisational activities occur)

Reviewed by: Laurence Clark

Approved by: CEO

Main Contact for Queries: info@pathwaysassociates.co.uk

1. Introduction and Commitment

Pathways Associates CIC is a disabled-led organisation committed to enabling people with learning disabilities, autistic people, and their families to live the lives they choose as equals in their local communities.

We value feedback, including complaints, as essential opportunities to learn, improve, and ensure our services — such as co-produced training, policy development, strategy support, and capability building — are inclusive, effective, and responsive.

Our complaints procedure is designed to be accessible, fair, transparent, and timely, aligning with best practice for small Community Interest Companies (CICs) as recommended by the CIC Regulator, Fundraising Regulator (where relevant), and sector guidance from organisations like Disability Rights UK and ACAS. It also reflects our values:

- **Encourage** — We welcome views and input from everyone to improve how we resolve issues
- **Enable** — We approach problems with a positive, "can-do" attitude to achieve fair resolutions
- **Aim** — We strive for the best experience for those we support and our partners
- **Deliver** — We use feedback to enhance our services and outcomes
- **Include** — Everyone with an interest in our work can provide feedback safely and without fear of reprisal

We commit to handling complaints sensitively, confidentially, and without discrimination, ensuring accessibility for disabled people (e.g., easy-read formats, support for communication needs). This procedure will be reviewed annually, with lessons learned shared via our board and annual CIC report.

2. What is a Complaint?

A complaint is any expression of dissatisfaction about our services, actions, or lack of action that requires a response. This includes concerns about:

- Quality of training, events, or support

- Staff or associate behaviour
- Accessibility or inclusion
- Policies, decisions, or partnerships

We encourage complaints to be made as soon as possible, ideally within 6 months of the incident (or within 6 months of becoming aware, up to 12 months total). Time limits may be waived for good reason, such as accessibility needs.

3. Who Can Complain?

Anyone affected by our work can complain, including:

- Current or former clients, service users, or participants (e.g., disabled people, families, professionals)
- Partners, stakeholders, or members of the public
- Employees, volunteers, or associates (though employment-related issues may use our Grievance Procedure)

If someone cannot complain themselves (e.g., due to disability or vulnerability), a friend, family member, advocate, or representative can do so with their consent. We will provide support, such as independent advocacy if needed.

4. How to Make a Complaint

We accept complaints in accessible formats to suit your needs, including:

- Verbally (in person, by phone, or video call)
- In writing (email, letter, or form on our website)
- Via social media (e.g., X, Facebook)
- Through an advocate or third party

Contact us at info@pathwaysassociates.co.uk or 01254 790220. If received verbally, we will record it in writing and confirm details with you.

All complaints are treated confidentially, with no negative consequences for raising them.

5. Roles and Responsibilities

- **All colleagues, volunteers, and associates**
  - Promote the procedure and assist anyone wishing to complain
  - Report concerns on behalf of others if they witness poor practice, abuse, or neglect
  - Participate in investigations as required
- **CEO / Director**
  - Oversee complaints handling and appoint Investigating Officers
  - Ensure timely responses and learning implementation
  - Report to the Board quarterly
- **Investigating Officer (nominated by CEO)**
  - Conduct fair, impartial investigations
  - Interview relevant parties and gather evidence
  - Recommend actions and lessons
- **Board of Directors**
  - Review complaints quarterly for themes and improvements
  - Ensure annual reporting in our CIC34 Community Interest Report

If a complaint involves safeguarding, abuse, or regulated activities (e.g., CETR/CTR involving Experts by Experience), we will follow our Safeguarding Policy and our Patient Safety Incident Response Policy and refer to the CQC where required.

6. Handling and Investigating Complaints

We aim for quick, fair resolution, starting informally where possible.

- **Acknowledgement**
  - We will acknowledge your complaint within 3 working days, confirming details and outlining next steps
  - If needed, we will discuss support (e.g., easy-read response, interpreter)

- **Informal Resolution**
  - Many issues can be resolved quickly through discussion
  - We will aim to address simple concerns within 5 working days
- **Formal Investigation**
  - If informal resolution fails or the issue is serious, we appoint an Investigating Officer (independent if appropriate)
  - Investigations are completed within 20 working days (extendable with your agreement if delays occur, e.g., due to illness)
  - We interview all parties fairly, respecting confidentiality and accessibility
  - If the complaint involves discrimination or disability, we consider Equality Act 2010 duties
- **Response**
  - You will receive a full written response (in your preferred format) within 28 working days total
  - The response will:
    - Summarise findings
    - State if upheld (fully/partially/not)
    - Offer an apology where appropriate
    - Detail actions (e.g., changes, training)
    - Explain appeal rights

If we cannot meet timelines, we will update you regularly.

7. Learning and Improvement

We view complaints as opportunities to enhance our work:

- All complaints are recorded in a secure register
- Themes are analysed quarterly by the Board
- Lessons are shared with staff, associates, and (where relevant) co-produced with Experts by Experience
- Updates to policies, training, or services are implemented and monitored
- An annual summary is included in our CIC report and published on our website for transparency

8. Appeals and Escalation

If the complainant is unsatisfied with our response:

- Request an internal review by the Board within 28 days — we will respond within 20 working days
- Escalate to external bodies if needed:
    - Parliamentary and Health Service Ombudsman (PHSO) for health-related issues: www.ombudsman.org.uk, 0345 015 4033
    - Local Government and Social Care Ombudsman (LGSCO) for social care aspects: www.lgo.org.uk, 0300 061 0614
    - CIC Regulator for concerns about our community interest: cicregulator@companieshouse.gov.uk
    - CQC for regulated activities: www.cqc.org.uk, 03000 616161
- Independent advocacy support is available.

If litigation is threatened, we may pause the process and seek advice, but we aim for open resolution.

9. Publicity and Accessibility

We promote this procedure widely:

- On our website, social media (X, Facebook), and materials
- At events, training, and meetings (e.g., easy-read versions, large print)
- Through partners and networks

We ensure it's accessible, with training for staff on handling complaints.