



PATHWAYX

COMPLAINTS HANDLING

POLICY & PROCEDURE

For students, parents and guardians, schools, employers and other contacts

Legal entity	PathwayX Ltd
Company number	NI742566
Registered office	8 Grange Road Lane, Dundonald, Belfast, BT16 1GH
Policy owner	Ben Glasgow, Founder & Director
Version and issue date	Version 1.0 - 4 August 2026
Next scheduled review	4 August 2027

Our commitment: PathwayX welcomes concerns and complaints, responds fairly and without retaliation, protects children and personal information, and uses what it learns to improve its services.

FINAL - ADOPTED, SIGNED AND PUBLICATION READY

Read with the Terms of Business, Privacy Notice, Data Protection & UK GDPR Policy and Child Protection & Safeguarding Policy.



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Need help to complain?: A complaint may be made verbally or in writing. A child or adult may use a trusted person, request an accessible format or ask PathwayX to write down a verbal complaint. Email pathwayx.coaching@gmail.com or write to the registered office.



Quick guide for making a complaint

You do not need legal language or a special form. Tell us what happened, when it happened, who was involved, how it affected you and what you would like us to do.

How to contact us

Email: pathwayx.coaching@gmail.com

Post: Complaints Lead, PathwayX Ltd, 8 Grange Road Lane, Dundonald, Belfast, BT16 1GH

Verbally: Tell a PathwayX representative or, during school delivery, ask a trusted member of school staff to help you. We will record the complaint and check that we understood it correctly.

What happens next

- We normally acknowledge a service complaint within 5 Business Days.
- We aim to give a substantive Stage 1 response within 15 Business Days after we have enough information, or explain the reason and revised date if more time is needed.
- If you disagree, you may request a Stage 2 review within 10 Business Days. We aim to issue the final response within a further 15 Business Days.
- We will explain the outcome, any action or remedy, and any relevant external option.

If a child may be unsafe: Do not wait for the complaints timetable. If there is immediate danger, serious injury or a crime in progress, call 999. Otherwise report the concern the same day to the PathwayX Designated Safeguarding Lead and, for school activity, the school's Designated Teacher. If the concern is about the PathwayX Director/DSL, contact the host safeguarding lead, the relevant HSC Trust Gateway Service and/or PSNI directly.

For children and young people

You can say when something feels wrong, unfair or unsafe. You will not get into trouble for making a genuine complaint. You can ask a parent, carer, teacher or another trusted adult to help. We will listen, explain what happens next in a way you can understand and only share your information with people who need it. If somebody may be unsafe, we may need to tell the right safeguarding person even if you ask us not to.



Document control and approval

Control	Current position
Policy owner	Ben Glasgow, Founder & Director
Complaints Lead	Ben Glasgow, Founder & Director
Independent route	A suitably independent reviewer appointed where the Director is involved, conflicted or has already decided the matter.
Status	Final - adopted and signed
Issue / review	31 July 2026 / no later than 4 August 2027
Early review triggers	Serious complaint, safeguarding or data incident, repeated theme, legal change, insurer requirement, new service or ineffective control.

1. Purpose, commitment and scope

This policy gives a clear, fair and accessible route for raising dissatisfaction about PathwayX Ltd and explains how concerns are assessed, investigated, reviewed, recorded and used for improvement. It supports accountability but does not replace the Terms of Business or remove any legal, contractual, safeguarding or regulatory right.

It applies to complaints from or concerning:

- students and adult learners using PathwayX One;
- parents, guardians, carers and adult purchasers;
- schools, colleges, employers and delivery partners using PathwayX Schools or PathwayX Reach;
- event participants, website users, prospective clients and members of the public; and
- conduct, communications, accessibility, service quality, administration, charges, privacy, safety or the actions of PathwayX personnel and authorised representatives.

Outside scope

Employee grievances, disciplinary matters and protected disclosures are managed under the applicable employment or whistleblowing arrangements. A request for information, service change, refund, data right or safeguarding help is routed to the correct process, but will also be logged as a complaint when it expresses dissatisfaction requiring a response. Contract disputes and invoice queries remain subject to the Terms of Business as well as this procedure where relevant.



2. Principles and responsibilities

Our principles

- **Safety first.** Urgent safeguarding, emergency, criminal and data-breach duties are not delayed by complaint handling.
- **Accessible and child-aware.** People can complain verbally or in writing, use support and receive age-appropriate or accessible explanations.
- **Fair and impartial.** The person complained about will not decide the complaint or review their own decision. Conflicts are recorded and managed.
- **Prompt and proportionate.** The depth of investigation reflects the seriousness, risk, evidence and potential wider impact.
- **Confidential and lawful.** Information is shared only where needed for investigation, safety, law, insurance or fair response.
- **No retaliation.** A person is not disadvantaged for making or supporting a genuine complaint, raising a concern or acting as a witness.
- **Learning-focused.** PathwayX records themes, completes corrective action and reviews whether other people or services may be affected.

Responsibilities

Role	Responsibility
Director	Approve the policy, provide resources, consider serious or repeated themes, ensure corrective action and notify advisers or insurers where required.
Complaints Lead	Receive and log complaints, triage risks, acknowledge, define the issues, appoint an investigator/reviewer, communicate with the complainant and close the record.
Investigator	Act objectively, preserve evidence, make proportionate enquiries, give relevant people a fair opportunity to respond and reach evidence-based findings.
Independent reviewer	Review the process, evidence, findings and remedy without prior material involvement; identify any correction or further work needed.
All PathwayX personnel	Recognise dissatisfaction, record verbal complaints, preserve relevant material, report urgent concerns immediately, cooperate and maintain confidentiality.
Host / commissioning organisation	Follow its own safeguarding and complaints duties, share relevant information lawfully and coordinate routes where services were delivered on its behalf.
Conflict involving the Director: Because PathwayX is initially director-led, a complaint concerning the Director cannot be screened, investigated or reviewed solely by him. PathwayX will appoint a competent external person with no material prior involvement. For commissioned work, an appropriate senior contact at the school, employer or partner may coordinate or participate where the contract and confidentiality rules allow.	



3. What counts as a complaint

Complaint: An expression of dissatisfaction about an act, omission, decision, communication, standard of service, conduct, charge, delay or handling by PathwayX where a response or remedy is expected. The person does not need to use the word 'complaint'.

Concern: Information suggesting risk, poor practice or possible harm. A concern may be handled immediately even where the person does not want a formal complaint.

Complainant: The individual or organisation making the complaint, including an authorised representative. A child can complain in their own right.

Business Day: Monday to Friday, excluding public and bank holidays in Northern Ireland.

4. How to make a complaint

Email pathwayx.coaching@gmail.com, write to the registered office, tell a PathwayX representative, or use any complaint form made available on the PathwayX website. During school or partner delivery, a complaint may also be raised through the host's nominated contact. Complaints should be made as soon as possible and preferably within six months of the event or the complainant becoming aware of it. PathwayX may accept an older complaint where there is a good reason, a continuing issue, safeguarding significance or sufficient evidence to investigate. This preference does not shorten any legal or contractual time limit.

It helps to provide:

- the complainant's name and safe contact method, unless reporting anonymously;
- the participant's name and the representative's authority where relevant;
- the PathwayX service, date, location and people involved;
- what happened, what was expected and how the person was affected;
- copies of relevant messages, documents or other evidence;
- whether anyone may be unsafe or an urgent deadline applies; and
- the outcome or remedy sought.

Support, representatives and anonymous complaints

A complainant may use a parent, guardian, advocate, interpreter, teacher, colleague or other trusted person. PathwayX may ask for proportionate proof of authority before sharing confidential information. Anonymous complaints are considered using the information available, although anonymity may restrict enquiries or the ability to provide an outcome. A complainant may request reasonable adjustments or an alternative format and will not be charged for making a complaint.

Do not send unnecessary sensitive material: Provide enough information to explain the issue, but do not send passwords, full payment-card details, original identity documents or unrelated information about other people. PathwayX will ask securely if further evidence is genuinely needed.



5. Triage and urgent or specialist routes

Every complaint is screened promptly for immediate safety, safeguarding, criminal, data-protection, insurance, contractual and conflict issues. A complaint may use more than one route at the same time; one process must not hold back another urgent duty.

Issue	Immediate route
Immediate danger, serious injury or crime in progress	Call 999. Take reasonable protective action without placing others at risk, then notify the host lead and PathwayX as soon as safely possible.
Child may be abused, harmed or at risk	Use the Child Protection & Safeguarding Policy immediately. Inform the PathwayX DSL and, in a school, the Designated Teacher. Contact the relevant HSC Trust Gateway Service and/or PSNI where required.
Concern about the Director / DSL	Do not report first to the implicated person. Contact the host safeguarding lead, HSC Gateway and/or PSNI directly. Preserve evidence and seek independent advice.
Personal-data complaint	Refer to the Data Protection Lead. Acknowledge within 30 calendar days, investigate and keep the person informed without undue delay, and communicate the outcome. ICO rights remain available.
Suspected personal-data breach	Report internally immediately under the Data Protection & UK GDPR Policy. Preserve evidence; do not promise that notification is or is not required.
Discrimination, harassment or accessibility barrier	Remove any immediate barrier or risk where possible, preserve evidence, investigate fairly and consider external deadlines. Do not require a person to complete the internal process before seeking advice.
Service, conduct, delay, fee or contract issue	Use this complaints process and the Terms of Business. Undisputed invoice sums and statutory consumer rights are handled as set out in the agreement and law.
Worker grievance or protected disclosure	Route to the applicable employment, grievance or whistleblowing arrangement without suppressing any safeguarding, criminal or regulatory report.
Safeguarding is not a customer-service dispute: PathwayX does not attempt to mediate an allegation of abuse, conduct its own criminal investigation or ask a child to repeat a disclosure for complaint purposes. Statutory and host safeguarding processes take priority, while service issues may be examined separately when safe to do so.	



6. Complaints process and timeframes

The timetable begins when PathwayX receives enough information to understand the complaint and contact the complainant. PathwayX will not delay acknowledgement merely because clarification is needed. If a deadline cannot be met, the complainant will be told the reason, work completed, outstanding steps and a realistic revised date.

1. **Step 1 - Receive and protect.** Record the complaint, preserve relevant evidence and take any immediate safety or service-continuity action.
2. **Step 2 - Acknowledge and clarify.** Normally acknowledge within 5 Business Days, confirm the issues and desired outcome, identify the handler and explain the next date.
3. **Step 3 - Stage 1 enquiries.** Seek early resolution where appropriate or carry out proportionate investigation. Aim to provide a substantive response within 15 Business Days after sufficient information is available.
4. **Step 4 - Stage 2 review.** If dissatisfied, the complainant may request a review within 10 Business Days of the Stage 1 response, explaining what appears wrong or incomplete.
5. **Step 5 - Final response and closure.** An independent person where practicable reviews the matter. PathwayX aims to issue a final response within 15 Business Days, records action and explains any external option.

Stage 1 - resolution and investigation

Simple issues may be resolved quickly through an explanation, correction, apology, rescheduling or other agreed action. Serious, disputed, repeated or wider-impact matters require a documented investigation. Early resolution does not mean minimising the concern or asking a complainant to withdraw it. The response will summarise the issue, enquiries, findings, outcome and action.

Stage 2 - review

The review is not automatically a complete reinvestigation. It considers whether the issues were understood, the process was fair, relevant evidence was considered, findings were reasonable and the remedy was proportionate. The reviewer may uphold the Stage 1 decision, change it, require further enquiries or substitute a different remedy. A late review request may be accepted where there is a good reason or significant new evidence.

Complex matters: A complex complaint may require additional time because of school holidays, witness availability, specialist advice, legal or insurer input, linked safeguarding or regulatory work, or substantial evidence. An extension is not open-ended: PathwayX will provide updates and a target date, normally seeking to complete each stage within no more than a further 15 Business Days unless an external process prevents it.



7. Investigation, review and decision-making

Planning the investigation

The handler records the agreed issues, scope, relevant standards, evidence sources, risks, conflicts, people to be consulted and target date. Investigation is proportionate: not every complaint needs interviews or a lengthy report, but serious allegations require a clear audit trail and appropriate advice.

The investigator or reviewer will, as appropriate:

- preserve original messages, documents, attendance or booking records and relevant system information;
- distinguish fact, allegation, opinion, professional advice and inference;
- invite the complainant to clarify material points and provide evidence;
- tell any person criticised the substance of relevant allegations and give a fair opportunity to respond, subject to safety, confidentiality and legal restrictions;
- consider service standards, the agreement, PathwayX policies, host requirements and applicable law;
- avoid leading a child, promising secrecy or duplicating a statutory safeguarding interview; and
- record the reasons for findings, remedy and any information that cannot safely or lawfully be disclosed.

Standard and possible findings

For an internal service decision, PathwayX normally decides what is more likely than not on the available evidence. This does not determine criminal guilt, civil liability, professional fitness or a statutory safeguarding outcome. Where an external body is investigating, PathwayX may pause only the parts that could prejudice that work while continuing necessary protective action.

Finding	Meaning
Upheld	The evidence supports the complaint in whole.
Partly upheld	The evidence supports some, but not all, material parts.
Not upheld	The available evidence does not support the complaint on the internal standard. This does not mean the complaint was dishonest.
Inconclusive	There is not enough reliable evidence to reach a finding, or accounts cannot fairly be reconciled.
Resolved / withdrawn	An agreed resolution was reached or the complainant chose not to continue. PathwayX may still act on safety, legal or wider-service issues.

The response

The written response will normally state the issues considered, key evidence or enquiries, findings and reasons, remedy or corrective action, anything that remains confidential, the review or external route and relevant deadline. PathwayX may provide an age-appropriate version to a child and a separate version to an adult or organisation where authority and confidentiality require it.



8. Outcomes, remedies and learning

PathwayX selects a remedy that is lawful, fair and proportionate to the impact and the service agreement. Making a complaint does not guarantee the particular outcome requested. Possible action includes:

- an explanation, acknowledgement or apology;
- correction of information, communication, administration or a record;
- rescheduling, re-performance or an agreed alternative service;
- a fee reduction, refund or credit where required or appropriate under the agreement and consumer law;
- a reasonable adjustment or change to accessibility, supervision or communication arrangements;
- training, additional oversight, policy or process change;
- contractor, personnel or disciplinary action where appropriate and lawful;
- notification to a host, insurer, regulator, safeguarding body or law-enforcement authority where required; and
- checking whether other participants, clients or records are affected and correcting any wider issue.

Corrective action is assigned to an owner and due date and is checked to completion. Complaint reports do not normally disclose confidential personnel action or another person's personal information.

9. Confidentiality, data and records

Complaint information is processed under the PathwayX Privacy Notice and Data Protection & UK GDPR Policy. Access is limited to people who need it for handling, review, safety, legal advice, insurance, audit or statutory duties. PathwayX cannot promise absolute confidentiality: information may need to be shared to investigate fairly, protect a person, comply with law or respond to a regulator, court, insurer or commissioning organisation.

The complaint log records receipt, category, people and services affected, risk and routing, acknowledgements, issues, evidence, conflicts, decisions, communications, remedy, external contact, lessons and closure. Routine complaint and related legal records are normally retained for six years after closure. A longer period may apply for safeguarding, insurance, litigation, regulatory action, a legal hold or another documented requirement. Safeguarding records are stored separately and follow the safeguarding retention rules; unnecessary working duplicates are securely deleted.

Recording meetings or calls: A participant must not secretly record, publish or redistribute a complaint meeting where this would infringe privacy, confidentiality or safeguarding. PathwayX will consider a reasonable request to record for accessibility, accuracy or support, agree how it will be used and protect the recording as personal information.



10. Fair access and unacceptable behaviour

PathwayX distinguishes a persistent or distressed complainant from unacceptable behaviour. Repetition, emotion, disability-related communication, limited English, youth or lack of legal knowledge is not by itself unreasonable. PathwayX will make reasonable adjustments and explain boundaries clearly.

PathwayX may restrict the method or frequency of contact where conduct is abusive, discriminatory, threatening, harassing, knowingly disruptive, excessively repetitive after a final response, or prevents a fair investigation. Any restriction will be proportionate, recorded, normally time-limited and communicated in writing with a contact route for genuinely new information or urgent safety issues. Threats, violence or suspected crime may be reported to PSNI. A restriction never prevents a safeguarding report, data-protection complaint or exercise of a legal right through the proper route.

Good-faith complaints are protected: A complaint that is mistaken, not upheld or difficult to prove is not malicious. PathwayX will only consider bad-faith action where there is clear evidence of deliberate fabrication or abuse, and never as a response to criticism or whistleblowing.

11. External options and legal rights

PathwayX encourages internal resolution where safe and appropriate, but the internal process is not a condition for contacting emergency, safeguarding, law-enforcement, regulatory or legal services. It does not pause court, tribunal, limitation or regulator deadlines. People should obtain independent advice promptly where a deadline may apply.

- **Consumer advice.** Northern Ireland consumers can contact Consumerline for free advice and to report a trader issue. Consumerline is not PathwayX's appeal body and may refer suitable matters to Trading Standards.
- **Data protection.** A person may complain to the Information Commissioner's Office. PathwayX would welcome an opportunity to respond first, but that is not mandatory.
- **Safeguarding.** Contact the relevant HSC Trust Gateway Service, PSNI, emergency services, host Designated Teacher or NSPCC as appropriate. A concern about the Director/DSL must bypass him.
- **Commissioned services.** A school, employer or partner may use its own complaint, procurement or contract-escalation route. This does not make that organisation responsible for every PathwayX decision.
- **ADR and mediation.** PathwayX is not currently committed to a particular consumer ADR scheme. After an unresolved consumer contract complaint, the final response will state whether an ADR or mediation arrangement is available and whether PathwayX is willing or obliged to use it. Any consumer-contract ADR provider must meet the current accreditation or exemption rules.
- **Courts and legal rights.** Nothing in this policy limits a mandatory consumer remedy, contractual claim, discrimination right, application to a court or tribunal, or report to an appropriate authority.



Useful contacts

PathwayX complaints	pathwayx.coaching@gmail.com 8 Grange Road Lane, Dundonald, Belfast, BT16 1GH
Consumerline NI	0300 123 6262 nidirect.gov.uk/services/contact-consumerline-make-complaint-or-ask-advice
Information Commissioner	0303 123 1113 ico.org.uk/make-a-complaint/
Child safeguarding	Emergency: 999 nidirect.gov.uk/articles/reporting-child-abuse-and-neglect

12. Monitoring, review and adoption

The Director reviews complaints at least annually for volume, category, service, age group where proportionate, response performance, outcomes, repeat themes, safeguarding or data links, accessibility, remedies and completion of corrective action. Reporting should use anonymised or aggregated information where possible. This policy is reviewed at least annually and sooner after a serious complaint, legal or guidance change, material service change, insurer requirement or evidence that the procedure is ineffective.



Appendix A - Complaint form

This form is optional. A complaint can be made in another reasonable way. Return it to pathwayx.coaching@gmail.com or the registered office. Do not include unnecessary sensitive information or original identity documents.

Complainant name	
Safe contact details	
Preferred contact / format	
Participant name, if different	
Relationship / authority	
Service	PathwayX One / PathwayX Schools / PathwayX Reach / Other
Relevant date and location	
People involved	
What happened?	
How were you affected?	
What outcome would help?	
Evidence attached	
Accessibility / support needed	

Urgent safety check

- ☐ Someone may be in immediate danger or need urgent medical help.
- ☐ This includes a concern that a child may be abused, harmed or at risk.
- ☐ This includes a possible personal-data loss, disclosure or security incident.

If immediate danger or serious injury exists, call 999 now. Do not rely on sending this form. Safeguarding concerns must also follow the same-day reporting route in the safeguarding policy.

Signature / name	
Date	
PathwayX reference	For PathwayX use



Appendix B - Internal handling checklist

Complete proportionately for every complaint. The detailed complaint record may be held in an approved restricted system; do not duplicate safeguarding material into the general log.

- ☐ Receipt date, channel, complainant and safe contact recorded.
- ☐ Verbal complaint written down and understanding checked.
- ☐ Immediate danger, safeguarding, data breach, crime, insurance and legal deadlines screened.
- ☐ Host / commissioning organisation route considered.
- ☐ Conflict check completed; person complained about excluded from decision-making.
- ☐ Acknowledgement sent within 5 Business Days; data complaint deadline separately diarised.
- ☐ Issues, scope, desired outcome and relevant standard agreed or recorded.
- ☐ Evidence preserved; legal hold considered; unnecessary sensitive material avoided.
- ☐ People criticised given a fair opportunity to respond where safe and lawful.
- ☐ Child communication, trusted-adult support and best interests considered.
- ☐ Stage 1 response issued within target or reason, update and revised date provided.
- ☐ Stage 2 request and independence assessed; reviewer appointed where required.
- ☐ Findings, reasons, remedy, confidentiality limits and external routes explained.
- ☐ Corrective action assigned to an owner and due date.
- ☐ Wider impact on other participants, clients, systems or records checked.
- ☐ Insurer, adviser, regulator, HSC/PSNI or other authority notified where required.
- ☐ Complainant informed of closure; retention and deletion date recorded.
- ☐ Learning/theme entered into periodic review without unnecessary identifying detail.

Closure record

Complaint reference	
Handler / reviewer	
Outcome	Upheld / Partly upheld / Not upheld / Inconclusive / Resolved / Withdrawn
Response and closure dates	
Corrective action owner / due	
Retention / legal hold	



Appendix C - References and adoption record

PathwayX documents

PathwayX Terms of Business

PathwayX Child Protection & Safeguarding Policy

PathwayX Privacy Notice

PathwayX Data Protection & UK GDPR Policy

Legal and good-practice sources

[ICO - How to deal with data protection complaints](#)

[ICO - Make a complaint](#)

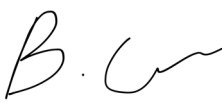
[nidirect - Contact Consumerline](#)

[nidirect - Reporting child abuse and neglect](#)

[GOV.UK - Digital Markets, Competition and Consumers Act 2024 ADR reforms](#)

Document status: Final - formally adopted and signed for publication. PathwayX must keep the complaint route accessible, follow this procedure in practice, record learning and review the policy after material legal, safeguarding, insurance or service changes.

Formal adoption

Approved by	Ben Glasgow
Role	Director
Signature	
Approval date	4 August 2026
Operational from	4 August 2026
Next review	4 August 2027

Publication: Publish the current approved version with an accessible complaint route. Archive superseded versions clearly and brief every person who receives or handles complaints before they undertake service delivery.