

# SMARTPATH UK GUARDIANSHIP

## COMPLAINTS POLICY

### POLICY STATEMENT

SmartPath UK Guardianship recognises that there may be legitimate concerns or complaints from students, staff, schools, parents or homestays relating to SmartPath UK Guardianship. As a company we encourage these concerns or complaints being made known to SmartPath UK Guardianship staff so that they can be addressed in partnership with us, and we can continuously improve our service.

At SmartPath UK Guardianship 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 all complaints within 28 working days of the complaint being received. Timeframes are detailed at each stage of this policy, however under circumstances in which the complaints are unusually complex or complicated time frames 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, ideally on our website;

- 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, are 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;
- Review regularly at senior management level the written record of complaints and their outcomes;
- Keep confidential all records relating to individual complaints;
- A record of formal complaints and their outcomes is kept by Meng-Ting Chang (Director) in electronic copy regardless of whether they were upheld.

## 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. Concerns should be raised with the relevant SmartPath UK Guardianship staff member who will:

- Keep a record of the complaint and any action taken;
- Respond to all complaints or concerns within 24 hours;
- Investigate the concern or complaint;
- Report back to the complainant within (add number of days) working days.

If the issue remains unresolved, the next step is to make a formal complaint.

### STAGE 2: FORMAL STAGE

If the complainant is not satisfied with how the complaint has been handled, they can make a formal complaint. This should be sent in writing to SmartPath UK Guardianship or if it is about Meng-Ting Chang to Wei-Ling Chang. They will:

- o Keep a record of the complaint and any action taken;
- o Respond initially to the complainant within 24 hours;
- o Investigate the concern or complaint – this may take some time but in any event they will keep the complainant informed of progress made;
- o Report back to the complainant formally in writing no later than 28 working days;
- o If the issue remains unresolved, the next step is to refer the matter to AEGIS.

### STAGE 3: REFERRAL OF THE MATTER TO AEGIS

If complainants are not satisfied with the outcome as decided by SmartPath UK Guardianship at stage 2, they can contact AEGIS to report their concerns if they wish to do so. Relevant contact details are set out below:

Yasemin Wigglesworth

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

[www.aegisuk.net](http://www.aegisuk.net)

### 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.

## VEXATIOUS COMPLAINTS

A complaint may be deemed vexatious if it is:

- o Persistent, obsessive, or harassing
- o Unrealistic or unreasonable in its demands
- o 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.

## UNREASONABLE CONDUCT

If a complainant behaves in an aggressive, abusive, offensive, or threatening manner, the following

actions may be taken:

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

## REVIEW

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

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*This policy was last reviewed In January 2026 by Limin Chen.*