Langley Hall Arts Academy

SSPo7

# SPECIAL EDUCATIONAL NEEDS and DISABILITY (SEND) POLICY

| POLICY | PROCEDURE | REFERENCE | FORMS |
|---|---|---|---|
| SSPo2 Child Protection and Safeguarding Children Policy and Procedure | | SEND Code of Practice | SEN referral Guidance |
| SSPo9 Equal Opportunities Policy | | Children & Families Act (2014) | |
| SSPo12 Examinations and Access Arrangements Policy | | Equality Act (2010) | |
| Curriculum Policy<br>Accessibility Policy and Plan<br>Positive Behaviour and Anti-Bullying Policy | | | |
| SSPo51 Admissions Arrangements Policy | | | |
| SSPo48 Accessibility Policy and Plan<br>Restrictive Intervention Policy | | | |

## About the Policy

**At Langley Hall Arts Academy, children and young people will be regarded as having special educational needs (SEN) if "they have a learning difficulty which calls for special educational provision to be made for them". This provision can include the involvement of extra teachers, or specific learning materials, special equipment, a different teaching strategy or external advice from specialist support staff e.g. speech and language teachers or Educational Psychologists.**

*A child of compulsory school age or a young person has a learning difficulty or disability if he or she:*

- *has a significantly greater difficulty in learning than the majority of others of the same age, or*
- *has a disability which prevents or hinders him or her from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.*

*The Equality Act 2010 sets out the legal obligations that schools, early years providers, post-16 institutions, local authorities and others have towards disabled children and young people:*

*• They must not directly or indirectly discriminate against, harass or victimise disabled children and young people*

*• They must make reasonable adjustments, including the provision of auxiliary aids and services, to ensure that disabled children and young people are not at a substantial disadvantage compared with their peers. This duty is anticipatory – it requires thought to be given in advance to what disabled children and young people might require and what adjustments might need to be made to prevent that disadvantage*

**SEND**

The SEND Code of Practice (2015) defines SEND as including four key areas:

1) Communication/Interaction
2) Cognition & Learning
3) Social, Mental & Emotional Health,
4) Sensory and/or Physical.

A pupil will receive SEND support if they require provision that is additional to the curriculum and they are not making expected progress. This applies to pupils regardless of whether they have an Education, Health and Care Plan (EHCP) or not.

The term 'learning difficulty' (also known as 'learning difference' or 'neurodiversity') may be used to reflect a range of needs or diagnosed conditions. These may include Dyslexia, Dyspraxia, Dyscalculia, Attention Deficit Disorder, Attention Deficit Hyperactive Disorder, Autism Spectrum Condition, as well as processing difficulties or other learning issues resulting from emotional/behavioural issues, mental health or medical conditions.

A pupil with a disability does not necessarily have a learning difficulty, but if they do, then they will be able to access the same support as any pupil with SEND.

The school's SENco is Ursula Andrew.

**Objectives**

*6.14 (CoP 2014) All schools should have a clear approach to identifying and responding to SEN. The benefits of early identification are widely recognised – identifying need at the earliest point and then making effective provision improves long-term outcomes for the child or young person.*

*6.16 (CoP 2014) Schools should assess each pupil's current skills and levels of attainment on entry, building on information from previous settings and key stages where appropriate. At the same time, schools should consider evidence that a pupil may have a disability under the Equality Act 2010 and, if so, what reasonable adjustments may need to be made for them.*

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*6.23 (CoP 2014) Slow progress and low attainment do not necessarily mean that a child has SEN and should not automatically lead to a pupil being recorded as having SEN.*

Langley Hall Arts Academy aims to ensure:

- Every pupil will have access to a broad and balanced curriculum, to which they are entitled.
- An ethos of equal opportunity is promoted
- Pupils will be regularly and appropriately assessed so that those with special educational needs are identified early. The identification of a young person's special educational needs is crucial in supporting that pupil's learning needs.
- A pupil identified as having special educational needs will be offered a graduated response of support for their special educational need.
- Strategies are developed that build on pupil's strengths and they will be encouraged to become self-motivated and independent.
- For children and young people with special educational needs, care will be taken to raise their self-esteem, encouraging a positive attitude and belief in themselves.
- Teachers will be aware that special provision must be made in their planning for pupils with special educational needs in relation to their individual learning plan.
- The school will work in open collaboration with pupils, parents and other agencies. A partnership between school and home is essential in providing the best education for the pupil.
- Where deemed to be necessary, the school will work in partnership with outside agencies to ensure the pupil's needs are met.
- The educational intervention will be regularly reviewed to assess its impact.
- The Form Tutor and subject teachers will monitor and record the progress of pupils with special educational needs.
- The Special Educational Needs Policy will be evaluated and monitored by the Principal and the SENCO and ratified by the school Governors annually.

**Staff Responsibilities**

*SEND Code of Practice 2014:*

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- *6.36 Teachers are responsible and accountable for the progress and development of the pupils in their class, including where pupils access support from teaching assistants or specialist staff.*
- *6.52 The class or subject teacher should remain responsible for working with the child on a daily basis. Where the interventions involve group or one-to-one teaching away from the main class or subject teacher, they should still retain responsibility for the pupil. They should work closely with any teaching assistants or specialist staff involved, to plan and assess the impact of support and interventions and how they can be linked to classroom teaching.*
- *6.36 Teachers are responsible and accountable for the progress and development of the pupils in their class, including where pupils access support from teaching assistants or specialist staff.*

- *6.37 High quality teaching, differentiated for individual pupils, is the first step in responding to pupils who have or may have SEN. Additional intervention and support cannot compensate for a lack of good quality teaching.*

"Provision for children with special needs is a matter for everyone in the setting.' (SEN Code of Practice).

All teachers at LHAA are responsible for the educational provision for pupils with individual needs within their classes/subject groups and will make reasonable adaptations for children and young people with special needs by:

- Developing and adapting plans and schemes of work to take proper account of the needs of all pupils, in terms of ability, need and aptitudes in collaboration with the Form Tutor.
- Implement strategies for supporting pupils with SEN needs in their learning
- Alerting the Form Tutor, Principal and SENCO of any cause for concerns regarding pupils experiencing difficulties in their subject, through year group and pupil progress meetings.
- Regularly referring to the Learning Support Register held on the School system.
- Reading and implementing the adaptation/recommendations listed on the student's Individual Learning Plan or from professional reports on file.
- Referring to Access Arrangements documentation prior to administering an assessment.
- Providing the nominated Examinations Officer with copies of pupils' completed examination scripts to act as evidence for Access Arrangements.
- Completing pupil Needs Audits as requested, as evidence for Access Arrangements.
- Ensuring confidentiality is maintained in all SEND matters.
- Attending training sessions when necessary in order to further understanding of SEND issues.

The Principal has overall responsibility for the admission and assessment procedures in the School. Together with the Governors, the Principal will support the SEND Policy and the SENCO in the role of ensuring the School implements the objectives it outlines.

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**SENCO responsibilities listed in the 2014 SEND Code of Practice**

*6.90 (CoP 2014) The key responsibilities of the SENCO may include:*

- *overseeing the day-to-day operation of the school's SEN policy*
- *co-ordinating provision for children and children and young people with SEN*
- *liaising with the relevant Designated Teacher where a looked after pupil has SEN*
- *advising on the graduated approach to providing SEN support*
- *advising on the deployment of the school's delegated budget and other resources to meet pupils' needs effectively*
- *liaising with parents of pupils with SEN*
- *liaising with early years providers, other schools, educational psychologists, health and social care professionals, and independent or voluntary bodies*
- *being a key point of contact with external agencies, especially the local authority and its support services*
- *liaising with potential next providers of education to ensure a pupil and their parents are informed about options and a smooth transition is planned*
- *working with the headteacher and school governors to ensure that the school meets its responsibilities under the Equality Act (2010) with regard to reasonable adjustments and access arrangements*
- *ensuring that the school keeps the records of all pupils with SEN up to date*

**Identification and assessment**

Early identification of SEN is crucial and it is built into the overall approach to monitoring progress and development of all pupils.

Through regular monitoring and assessment, teachers should identify pupils whose progress is a cause for concern. Advice should be sought from the SENCO and from previous teachers and other members of staff. A gradual approach to support and support procedures should then be followed. Guidance for observations and the relevant forms can be obtained from the SENCO.

Information regarding pupils with a pre-existing need and any previous assessments will be requested from their previous school or from their parent/carers. Further information will be gathered in collaboration with the pupil, parents and previous/current school and support arrangements co-produced and agreed in partnership with pupil and parent. Additional information will be used to build picture of their strengths and challenges and may include:

- Review/discussion of the strategies in place
- Recommendation of new strategies
- Classroom observations
- Checklist audit of observed symptoms.
- Teacher and family questionnaire
- Pupil voice feedback
- Initial screening assessments.

Concerns regarding the individual learning needs for a pupil may come from a variety of sources, including transfer information from a previous school, information at application, pupil request, teachers, parents or other members of staff. These concerns should be

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brought to the attention of to the Principal and SENCO following the Learning Support referral procedure and during year group or pupil progress meetings.

Parents often pass on their concerns regarding speech, hearing, behaviour, sleeping, emotional difficulties, eyesight and other physical problems. Teachers should welcome this information and record any parental anxieties. These should then be monitored and reviewed.

After identification of a pupil's difficulty, SEND provision is put in place following a graduated response. Quality Teaching First is foremost in addressing the identified barriers to learning. When there is a need for further support, appropriate evidence-based interventions are implemented. Interventions are part of a graduated approach: Assess, Plan, Do, Review.

If appropriate following initial screenings, and in consultation with parents, the pupil may undertake a full diagnostic assessment to get a broader understanding of their strengths and challenges. This can either be completed by a Level 7 qualified Specialist Assessor or by one of the school's associated Educational Psychologists. Consultation with these external professionals are billed directly to parents.

Parents retain the right to seek an external assessment regardless of the outcomes from the initial investigations and screenings. LHAA discourages the private commissioning of assessments with an external assessor that does not have prior relationship/link with the school, since the school will not be able to accept it. This is because the JCQ Regulations in relation to Access Arrangements states that such reports may not be used as evidence in applications for Access Arrangements.

It is the responsibility of the Principal to decide whether or not a report may be accepted.

**Procedure for testing by Educational Psychologist**

1. A parent, Form Tutor, SENCO or the Principal can request that a pupil be tested by an Educational Psychologist.

2. If a parent makes a direct request to the SENCO an appointment is made accordingly.

3. If a teacher recommends that a pupil be tested by an Educational Psychologist, then they must inform the SENCO and the Principal.

4. If the graduated approach to support has been followed and there is agreement of the level of need for assessment, parents will be consulted. The options available for learning support within the school should be discussed and three cycles of Assess-Plan-Do-Review must have been completed.

5. If the parent agrees to their pupil being tested, then the SENCO will co-ordinate the testing to take place. The Educational Psychologist's fees will be charged direct to parents.

6. The procedure requires the following items to be sent to the parents:
    a. A standard school letter inviting the parents to a meeting.

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b. Referral form as relevant to the professional with request for parent permission
c. Strengths & Difficulties Questionnaire and background information query

7. When this information has been returned to the school, the SENCO must be informed and the information collated ready to send to the Educational Psychologist.

8. Internal testing/screening should also commence in order to provide relevant information for the Educational Psychologist, giving educational background and information on the pupil's strengths and weaknesses. The Form Tutor will be asked to complete a teacher checklist of strategies and interventions already implemented and an impact statement for each item.

9. When the information above is complete, the SENCO or nominated administrator will then forward all relevant information to the Educational Psychologist/external professional and co-ordinate an appointment.

10. Parents will be informed of the date, time and venue for meeting with the Educational Psychologist/external professional following which the test/assessment of their pupil will take place. This information should also be sent to the SENCO, Form Tutor and Principal

11. Testing takes place.

12. The SENCO will arrange a mutually convenient time for the parents, Educational Psychologist, SENCO, Form Tutor and other professionals involved with the pupil (as appropriate) to discuss the report. Parents will be sent confirmation of the time, date & venue for the meeting along with a copy of the Educational Psychologist's report.

**13.** At the meeting, the report will be discussed and the most appropriate course of action for the pupil will be planned.

**Graduated response for SEND provision**

LHAA aims to provide every pupil with identified SEND with a package of support to meet their needs.

If a pupil has progressed through the graduated stages of learning support and assessment shows that they have "significantly greater difficulty in learning than the majority of children and children and young people of the same age, or they have a disability which prevents or hinders them from making use of educational facilities of a kind generally provided for young people of the same age" then the parents and pupil will be consulted and a graduated response following an Assess, Plan, Do, Review approach will be followed and the pupil's name will be placed on the LHAA Learner Support register.

This provision is "additional to, or otherwise different from, the educational provision made for pupils in their year" (Code of Practice 2014). LHAA recognises that SEND is a continuum and therefore every individual's needs will be different.

> *6.37 High quality teaching, differentiated for individual pupils, is the first step in responding to pupils who have or may have SEN. Additional intervention and support cannot compensate for a lack of good quality teaching.(SEND Code of Practice 2014)*

The Form Tutor takes initial actions in drawing up an Individual Learning Plan (ILP) in collaboration with subject teachers, parents and the pupil to ensure reasonable adaptations within the classroom/learning space (Quality First Teaching) are implemented.

Co-produced ILPs are signed by the parent and pupil and reviewed termly together. This document is shared with the Principal and SENCO and a copy stored in the pupil's class file.

The ILP targets are initially implemented through appropriate adaptations/strategies within the classroom/learning space. This may be the adaptation of task, outcomes or learning styles (Wave 1 - Quality First Teaching). All subject teachers are responsible for catering for these needs and for supporting and monitoring progress accordingly and storing of pupil information in liaison with the Form Tutor.

If at review the pupil has reached the targets set and those concerned decide the pupil no longer requires the same level of intervention, then the pupil's name will be removed from the Learning Support register. They may however continue to receive learning support at an appropriate level.

If the pupil has made good progress towards targets set, but concerns remain, then a new ILP will be written incorporating new agreed targets. Staff will work in partnership with the parents and pupil.

If the pupil has not reached the targets set then support may be further supplemented with small group interventions (Wave 2) within the classroom or during lunchtime, and this is reviewed termly.

If the pupil continues to make inadequate progress, then an Educational Psychologist's or appropriate other professional's report may be recommended (if the pupil has not already been assessed). There will have been a minimum of three cycles of Assess-Plan-Do-Review prior to involvement of an external agency.

Further discussion with parents is held together with the SENCO and Principal when advice or assessment from outside agencies is required. Referrals to a range of NHS services may be made by the school on behalf of the family. Parents may privately commission an appropriate external professional for assessments. The exception to this is where the information may be required for evidence toward Access Arrangements (for example the Educational Psychologist or Specialist Teacher's report), in which case the professional already in association with the school will be commissioned, in line with the JCQ regulations. All external professional's fees will be cross-charged to parents.

When it is felt that a pupil would benefit from on-going specific specialist support, the SENCO and Principal will meet with parents to discuss how this will be implemented. With parent permission, the Principal authorises the commissioning of appropriate external Specialists for weekly interventions. The professional's fee will be cross-charged to the parent account on a half termly basis.

Specialist teaching and support may take the form of:

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a. One-to-one teaching for pupils with learning needs, speech and language needs or physical needs that are additional to and different to that normally on offer and requiring delivery by an appropriate external specialist (e.g. a neurodiversity specialist, Speech & Language Therapist or other appropriate therapist).
b. Small group sessions (no more than 4 pupils in a group) delivered by an appropriate external specialist

Literacy sessions will be delivered twice a week (40 minutes per session) outside of the core learning hours. Time and frequency of other external agencies will be by arrangement and coordinated by the SENCO.

**Review and monitoring**

Working with the staff, the Principal and SENCO take the lead in monitoring and reviewing information to inform co-ordination of staff to implement the pupil's individual learning provision.

Provision is monitored and reviewed termly and at each Key Stage. The SENCO, Heads of curriculum subjects, Form Tutors and Principal liaise regarding learners who may need support. This occurs on a termly basis to review the support and redirect it as necessary.

The Form Tutor will meet with parents at least termly to discuss pupil progress.

**More Able pupils**

Pupils who are 'significantly more able than the majority of children and young people their age' will also be recognised as having a 'special educational need' and the subject specialist teacher will include adaptations that provide 'stretch and challenge' for these pupils. The teacher may organise small group work for those who would benefit from additional extension work in maths or English

**English as an Additional Language**

A pupil for whom English is an additional language does not necessarily have a learning difficulty, but if they do, then they will be able to access the same support as any pupil with SEND.

At LHAA we draw on the resources available to us in the community and country as a whole to help and assist pupils with English as an additional language as a part of our quality first teaching.

Additional training will be given to staff who are working with children who have English as an additional language and every effort will be made by us to understand, appreciate and meet their needs.

**Homework**

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Homework should be set at an appropriate level for each pupil within the class whether it is set by subject teachers or special needs teachers. All teachers should be aware of a pupil's special needs and have a strategy in place for meeting them.

**Access Arrangements**

Disclosure of SEND at application is encourage, so that Access Arrangements can be put in place, where appropriate, for any admission assessments and for future external exams. A meeting can be held prior to entry to discuss needs and support provision.

Access Arrangements have to be applied for separately direct to the relevant external awarding body to ascertain if the criteria for eligibility are met, in accordance with their regulations and guidance.

**An Education, Care and Health Plan (EHC)**

Where a prospective pupil has an Education and Healthcare Plan (EHC plan) and the local authority is in agreement to placement in an independent school, then the School will consult with the parents and the Local Authority (where appropriate) in order to determine whether the identified provision in the EHC plan can be honoured by the school.

If a child enters the school with an EHC plan, additional support will be offered and an ILP written to ensure that the child's needs are met in relation to the EHC plan objectives.

- The ILP will be reviewed at least termly by the Form Teacher and parents.
- The school will cooperate and liaise with the Local Authority (LA) to carry out the statutory Annual review. The summary of this meeting will be sent to the LA so that any recommendations and amendments can be considered and amendments to the EHC plan can be made by them.
- Should any additional services be required to meet the details of support specified in the EHC plan, these will be charged to the Local Authority (if the LA is responsible for the fees and LHAA is named in the plan), otherwise charges will be made to parents for services outside what is deemed to be 'reasonable adjustments'.

Where the LA is responsible for the fees and LHAA is named in the plan, the EHC remains active until the pupil is 25 or the LA ceases to maintain it in line with ceasing criteria.

**Links with outside agencies**

The school does not have daily access to outside agencies, but as and when appropriate will work and liaise closely with the following NHS and other professional agencies from the local offer, for the purpose of assessments, referrals, time-limited direct therapy support and emergency support: For example:

- MPT Multi-Professional Team
- Educational Psychologist
- Learning and Language Support Services
- Behaviour Management
- Paediatric Occupational Therapy
- Speech and Language
- English as a Second Language Service

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- Physical and Sensory Support
- Child Assessment Service
- School Doctor
- School Nurse
- Paediatric Consultant
- Social Services

Parents of young people who require a specialist assessment or treatment are given the opportunity to access these services or will be signposted to services on the local authority's 'local offer' website, as appropriate for the individual's level of need.

Where parents' consent to the involvement of non-NHS external professionals, the professional's fee charged to pupil accounts for the associated assessments and/or therapy sessions.

Outside professionals should liaise with the school to help inform the assessment. The school are happy to consider a private report from such professionals to raise awareness/understanding of an individual's need. This will be recorded and compared to our own assessments and information on how the pupil is developing. However, this will not automatically mean your pupil is eligible for higher levels of support or that Access Arrangements will be awarded based on it.

For clarity: An independent report on its own is not an automatic guarantee that a student will receive a higher level of support or the Access Arrangements requested

**Extra-curricular activities**

Children and young people should not be excluded from any extra-curricular activities because of their special needs.

**Resources and their use**

Every Form Tutor will have access to a wide range of resources specifically designed to help children and young people with special needs. Where necessary, reasonable adjustments will be made through the purchase of additional resources to meet children and young people's needs.

**Information Sharing and Transition**

The Academy recognises the importance of effective information sharing in supporting children and young people with SEND. Accurate and timely sharing of information enables receiving schools, colleges and other providers to understand a pupil's identified needs, support strategies, safeguarding considerations, reasonable adjustments and successful approaches to learning.

When a pupil transfers to another school, college or educational provider, the Academy will seek to ensure that relevant SEND information is transferred securely and without unnecessary delay. Where needs are significant, complex or ongoing, the SENCO may liaise directly with the receiving setting in order to support effective transition planning and continuity of provision.

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Information sharing will be undertaken in accordance with safeguarding requirements, data protection requirements and the Child Protection and Safeguarding Children Policy and Procedure. The Academy recognises that effective transition arrangements are particularly important for pupils with SEND, who may be more vulnerable to disruption in educational provision and support.

**Promoting welfare and safeguarding**

All young people want to be respected, their views to be heard, to have stable relationships with professionals built on trust and for consistent support provided for their individual needs. This guides the behaviour of Langley Hall Arts Academy staff. Anyone working with children should see and speak to the pupil; listen to what they say; take their views seriously; and work with them collaboratively when deciding how to support their needs and wellbeing.

Effective child protection is essential as part of wider work to safeguard and promote the welfare of children and young people. However, all agencies and individuals should aim to proactively safeguard and promote the welfare of children and young people so that the need for action to protect children and young people from harm is reduced. Staff at Langley Hall Arts Academy has an up-to-date understanding of safeguarding.

The Academy recognises that children and young people with SEND are statistically more likely to experience safeguarding challenges and may face additional barriers in communicating worries, reporting concerns or understanding that they are experiencing harm. Staff should be alert to the fact that safeguarding concerns may present differently in children with SEND and should avoid making assumptions that behaviours, communication difficulties, emotional responses or changes in presentation are solely a consequence of a child's identified need.

The Academy also recognises the close relationship between special educational needs, mental health and wellbeing. Some pupils with SEND may experience anxiety, emotional distress, low mood, dysregulation, isolation or other mental health difficulties which may affect their learning, attendance, relationships and wider wellbeing. Staff will work collaboratively with families, safeguarding leads, external agencies and relevant professionals to ensure that both educational needs and wellbeing needs are identified and supported appropriately.

Where concerns arise regarding a pupil's welfare, attendance, behaviour, emotional wellbeing or family circumstances, consideration will be given to whether Early Help, Family Help or other multi-agency support may be appropriate. The Academy recognises that pupils with SEND are over-represented amongst children requiring additional support and early intervention services and will work proactively with families and partner agencies when concerns emerge.

Staff at Langley Hall Arts Academy is encouraged to share their concerns regarding safety and wellbeing of children and young people. The appropriate actions are taken when the issues have been raised. Staff is aware of the need to maintain privacy and confidentiality.

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**Restrictive Interventions**

The Academy is committed to promoting positive behaviour through understanding individual needs, reasonable adjustments, proactive support and de-escalation strategies. The school recognises that children and young people with SEND may be disproportionately represented in incidents involving distress, dysregulation, behavioural escalation and restrictive intervention.

All staff are expected to consider whether a pupil's special educational needs, disability, communication needs, sensory needs, mental health needs or other vulnerabilities may be contributing to the behaviour being presented and to take these factors into account when planning support and responding to incidents.

The school's arrangements relating to restraint, seclusion, recording, monitoring and review are set out in the Restrictive Intervention Policy. Where restrictive intervention is used, records will include SEND status and any relevant needs that may have informed decision making before, during or after the incident.

The Academy recognises that any use of restrictive intervention involving a pupil with SEND requires careful review to ensure that appropriate support, planning, risk assessment, reasonable adjustments and preventative strategies are in place. The lessons learned from such incidents will inform future planning and support arrangements.

**School Special Needs Governor**

The Special Needs Governor is Sally Morrison who will with the SENCO keep themselves informed about SEN issues in the school and the statutory obligations placed on us by the Government. The Governing and Proprietary Body will also monitor the SEN provision (see Governor's Monitoring Action Plan) within the school and submit a report on this in the Governors' Annual Report to Parents.

**Accessibility and Inclusion**

The Academy is committed to ensuring that disabled pupils are able to participate fully in school life and access educational opportunities alongside their peers. The SEND Policy should therefore be read alongside the Accessibility Policy and Three-Year Accessibility Plan. The Accessibility Plan sets out the Academy's arrangements for improving access to the curriculum, improving the physical environment and improving the availability of information for disabled pupils and their families. The planning, monitoring and review of SEND provision will take account of the objectives contained within the Accessibility Plan in order to ensure a coordinated and inclusive approach.

The Academy recognises that accessibility planning and SEND provision are closely linked and share the common objective of reducing barriers to participation, promoting equality of opportunity and supporting successful educational outcomes.

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**Complaints**

Complaints about the Special Needs Provision should be addressed in the first instance to the SENCO. If this is not resolved then it should be taken to the Principal and ultimately to the Chair of the Governing Body who will follow the complaints procedure.

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