



## Complaints Handling Policy

<b>Purpose:</b>	The purpose of this policy is to provide written processes about receiving, assessing, investigating and otherwise dealing with complaints. <sup>1</sup>	
<b>Scope:</b>	Any person directly affected by the subject of a complaint. Examples may include staff, students or a student's parent or guardian, contractors, or community members.	
<b>Status:</b>	Approved	<b>Supersedes:</b> Complaints Handling Policy 2024
<b>Authorised by:</b>	School Governing Body Chairperson	<b>Date of Authorisation:</b> 21/01/25
<b>References:</b>	<ul style="list-style-type: none"> <li>● <a href="#">Education (Accreditation of Non-State Schools) Regulations 2017 (Qld)</a></li> <li>● <a href="#">Fair Work Act 2009 (Cth)</a></li> <li>● <a href="#">Work Health and Safety Act 2011 (Qld)</a></li> <li>● <a href="#">Privacy Act 1988 (Cth)</a></li> <li>● <a href="#">Anti-Discrimination Act 1991 (Qld)</a></li> <li>● <a href="#">Australian Human Rights Commission Act 1986 (Cth)</a></li> <li>● <a href="#">Sex Discrimination Act 1984 (Cth)</a></li> <li>● <a href="#">Age Discrimination Act 2004 (Cth)</a></li> <li>● <a href="#">Disability Discrimination Act 1992 (Cth)</a></li> <li>● <a href="#">Racial Discrimination Act 1975 (Cth)</a></li> <li>● <a href="#">Standards Australia, Guidelines for complaint management in organisations (ISO 10002:2022, NEQ)</a></li> <li>● Discovery Christian College Work Health and Safety Policy</li> <li>● Discovery Christian College Privacy Policy</li> <li>● Discovery Christian College Anti-Discrimination Policy</li> <li>● Discovery Christian College Sexual Harassment Policy</li> <li>● Discovery Christian College Workplace Bullying Policy</li> <li>● Discovery Christian College Students with Disability Policy</li> <li>● Discovery Christian College Code of Conduct</li> </ul>	
<b>Review Date:</b>	Annually	<b>Next Review Date:</b> January 2026
<b>Policy Owner:</b>	School Governing Body	

<sup>1</sup> Education (Accreditation of Non-State Schools) Regulations 2017, s.7

## Policy Statement

Discovery Christian College acknowledges the right of students, parents/guardians, staff and others to complain when dissatisfied with the school's services, including an action, inaction or decision of the school. The school encourages constructive criticism and complaints. Discovery Christian College is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way.

Discovery Christian College will ensure employees can recognise, receive, and appropriately refer complaints to the informal or formal complaints procedure.

Discovery Christian College recognises that time spent on handling complaints can be an investment in better service to students and parents/guardians and a better culture for employees, and views complaints as part of an important feedback and accountability process.

## Definitions

Complaint	An expression of dissatisfaction made to or about the school, related to the school's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. <sup>2</sup>
Informal Complaint	A complaint about a matter that is likely to be simple, straight forward, easily manageable, or minor, where a simple or quick resolution is appropriate such as discussion of the matter with a relevant staff member.
Formal Complaint	A complaint about a matter that is serious, complex or may pose a threat to the health and safety of any person. Examples include serious allegations or breaches of policy, complaints against a senior staff member, including the principal or an informal complaint that could not be resolved informally. Assessment of the complaint is required by <<add role or roles e.g. a relevant member of the senior leadership team>>.
Complainant	The person, organisation or their representative making a complaint. <sup>3</sup>
Respondent	The person who is referred to in a complaint by a complainant as the person responsible for their concerns or who can best respond to their concern.

## Complaints Handling Principles

Discovery Christian College will manage complaints according to the following (which include principles of procedural fairness):

- complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe
- complaints should be resolved with as little formality and disruption as possible, having regard to the nature of the complaint

<sup>2</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

<sup>3</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.2

- interested parties to the complaint (for example, the complainant and any respondent) will be heard and/or may provide relevant information in relation to the complaint
- confidentiality and privacy will be maintained as much as possible
- the complainant and any respondent will be offered support as appropriate
- victimising behaviour towards a complainant, respondent or other people associated with the complaint, will not be tolerated
- complainants that lodge a complaint on reasonable grounds will not suffer any other reprisals on the basis of the lodging the complaint

### **Complaints that may be Resolved under this Policy**

Discovery Christian College encourages anyone who feels impacted by an issue involving the school to file a complaint. Complaints can address matters such as:

- the school, its employees or students having done something wrong
- the school, its employees or students having failed to do something they should have done
- the school, its employees or students having acted unfairly or impolitely
- issues of student or employee behaviour that are contrary to the relevant <<behaviour management policy or code of conduct>>, including inappropriate staff conduct as reported by a student.<sup>4</sup>
- issues related to learning programs, assessment and reporting of student learning
- issues related to communication with students or parents or between employees
- issues related to school fees and payments
- general administrative issues
- issues relating to non-compliance with a process outlined in school policies or procedures, for example the child protection policy, discrimination policy, or privacy policy.<sup>5</sup>

Student complaints may be brought by students or by parents on behalf of their children, as appropriate in the circumstances.

### **Issues Outside this Policy**

The following matters are outside the scope of this policy and should be managed as follows:

- Child protection concerns including allegations of sexual abuse, likely sexual abuse or harm to children should be dealt in accordance with the school's Child Protection Policy.
- Student bullying complaints should be dealt with under the Anti-Bullying Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the Student Discipline Policy.
- Student or employee violence or criminal matters should be directed to <<the principal>> who will involve the Police as appropriate.
- Disputes relating to a staff member's employment should be directed to their manager and dealt with under the enterprise agreement and/or employment law.
- Disputes between board members, between association members and board members or between association members should be dealt with in accordance with the Constitution.
- Formal legal proceedings should be managed as appropriate in the circumstances.

<sup>4</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

<sup>5</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

## **Responsibilities**

### **College**

The College has the following role and responsibilities:

- develop, implement, promote and act in accordance with the College's Complaints Handling Policy and procedures
- appropriately communicate the College's Complaints Handling Policy and procedures to students, parents and employees
- ensure that the Complaints Handling procedures are readily accessible by staff, students and parents
- upon receipt of a complaint, manage the complaint in accordance with the process
- ensure that appropriate support is provided to all parties to a complaint
- take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them
- appropriately implement remedies
- appropriately train relevant employees
- keep records
- conduct a review/audit of the Complaints Register from time to time
- monitor and report to the governing body on complaints
- report to the College's insurer when that is relevant
- refer to the College's governing body immediately any claim for legal redress.

### **All Parties to a Dispute**

The complainant and respondent both have the following role and responsibilities:

- apply and comply with the College's Complaints Handling Policy
- provide complete and factual information in a timely manner
- not provide deliberately false or misleading information
- not make frivolous or vexatious complaints
- act in good faith and maintain a mutually beneficial relationship of trust and cooperation
- act in a calm, courteous and non-threatening manner
- acknowledge that a common goal is to achieve an outcome acceptable to all parties
- recognise that all parties have rights and responsibilities which must be balanced
- maintain and respect the privacy and confidentiality of all parties

### **Employees Receiving and / or Managing Complaints**

Employees receiving complaints have the following role and responsibilities:

- act in accordance with the College's Complaints Handling Policy
- refer the complainant to the College's Complaints Handling Policy and provide additional information as necessary
- maintain confidentiality as far as possible
- keep appropriate records
- forward complaints to more senior employees, including the Principal, if the complaint cannot be resolved at the initial level or if it involves serious issues that require the involvement of more senior employees.

- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

## **Implementation**

Discovery Christian College is committed to raising awareness of the process for resolving complaints at the College, including by the development and implementation of this policy and related procedures, and via the clear support and promotion of the policy and procedures.

Discovery Christian College is also committed to appropriately training relevant employees on how to resolve complaints in line with this policy and the related procedures.

Discovery Christian College will keep appropriate records of complaints, will monitor complaints and their resolution and will report on a high-level basis to the College Board on complaint handling at the College.

Discovery Christian College will act to encourage students, parents and employees to contribute to a healthy College culture where complaints are resolved with as little formality and disruption as possible.

## **Complaint Register**

Discovery Christian College will maintain a complaint register with details such as the date, source and description of complaints, the employee managing the complaint, the actions taken, outcome and the date the complaint was closed.

The complaint register will be stored securely.

All complaints shall be entered onto the complaint register as soon as practicable after the complaint is received. The complaint register will not contain complaints about the Principal. Records of complaints about the Principal will be maintained by the Board with access restricted to the Board.

To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire complaint register will be limited to the Principal, Heads of School and the Business Manager.

The Principal may authorise the sharing of specific, relevant entries from the complaint register with other designated staff members (such as the senior leadership team), provided measures are taken to protect the confidentiality of all parties involved, particularly ensuring that respondents to a complaint do not gain inappropriate access to information about the allegations against them.

# Complaint Handling Procedure

## 1. Lodging a Complaint

- a) Complaints can be lodged with the most appropriate staff member at the local level, for example, the initial contact point for many complaints is the student's relevant classroom teacher.
- b) Complaints about the principal must be lodged with the Board via email - an email can be provided by contacting the College Administration Team.
- c) Complaints can be lodged through various methods, including
  - i. Phone
  - ii. Email
  - iii. In-person (by appointment)
- d) If the complainant is unsure where to direct their complaint, they can contact the College Administration Team for guidance.
- e) If the complainant is uncomfortable directing the complaint to the most appropriate member at the local level, or wants to make a formal complaint, they can submit a complaint by contacting the Principal in writing (via email) or by making an appointment with the Principal by contacting the College administration to arrange an appointment.
- f) Where an anonymous complaint is lodged, the school will follow the complaints handling policy, when there is sufficient information to do so.

## 2. Acknowledgement, Assessment and Referral

- a) The staff member receiving the complaint will:
  - i. acknowledge the complaint within two (2) business days, outlining the next steps and where possible the estimated time frames.
  - ii. assess the complaint, using the definitions of informal and formal complaints in this policy, and refer the complaint to the informal or formal complaints process.

## 3. Registration and Support

- a) The recipient of the complaint will promptly enter it onto the complaints register, regardless of whether it proceeds through the informal or formal process.
- b) The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.
- c) If a student is a complainant, respondent or victim, or the child of a complainant, respondent or victim of a matter being managed through this policy, the school may offer the student support where appropriate e.g. discussing suitable adjustments with parents/caregivers.

## 4. Informal Complaints Handling Process

- a) The informal process is designed to resolve issues promptly and collaboratively at the local level.
- b) It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s).
- c) If the complaint cannot be resolved informally, it will be escalated to the formal process.

## **5. Formal Complaints Handling Process**

- a) The formal process begins with the assessment of the complaint by a designated staff member (e.g., a member of the senior leadership team or the board chair for complaints against the principal)
- b) The staff member may gather additional information through investigation, interviews, or evidence review
- c) The staff member will determine appropriate action, which may include:
  - i) Mediation
  - ii) Disciplinary measures
  - iii) Implementation of policy changes
  - iv) Referral to external agencies (e.g., police)
  - v) Provision of written updates to the complainant throughout the process
  - vi) Other actions the Principal or delegate determine as appropriate in the circumstances.

## **6. Complaint Closure**

- a) The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome.
- b) The complainant will receive written notification of the outcome and any actions taken where appropriate.

## **7. Appeals Process**

- a) Complainants may appeal the outcome of a complaint by writing to:
  - i. the principal (for complaints not previously managed by the principal,)
  - ii. the board chair (for complaints previously managed by the principal, or complaints about the principal).

## Dispute Procedure

1. The complainant is required to make the complaint in writing to the Principal.
  - In cases where the complaint is regarding the Principal, the relevant documentation is to be addressed to the Chairman of the Executive Management Committee, marked “Confidential – Formal Complaint”. All documentation is to be handed to College Administration, which will document the receipt of the complaint and forward it on. This may also be sent electronically and marked Confidential - Formal Complaint in the subject line of the email.
2. The complaint and any other documentation are to be submitted to the Principal by the Complainant.
3. The Principal and another senior staff member (with, as necessary, external advice) will decide how best to manage the complaint. This may include:
  - Handling the complaint under a specific College Policy – if applicable
  - Mediation
  - Internal investigation by appropriate senior staff
  - Engaging an external person to investigate the complaint.
4. The Principal will meet the alleged Offender/Respondent to inform him/her of the complaint and all details and copies of documents.
  - The Principal will invite the Respondent to respond then and there, if he/she wishes or at a later time.
5. The Principal will inform both Complainant and Respondent of the Formal Complaint Management Plan decided upon, to address the complaint.
6. Both parties are invited to have support persons of their choice at all stages of the proceedings.
7. If mediation has been decided upon, an outside mediator or other mediator agreeable to both parties will be engaged.
  - The mediation will take place.
  - Both parties will be requested to support any outcome.
  - Both parties will be requested to sign on the outcome agreed upon.
  - The matter will be monitored at set intervals subsequently.
8. If the Principal decides the matter needs to be looked into internally, a senior staff member will be delegated as Complaint Case Manager for the complaint in question.
  - Relevant members of staff will be interviewed.
  - The Complaint Case Manager will meet with College senior staff to give a summary of the matter.
  - The Principal and College senior staff (at the discretion of the Principal) and external adviser will decide on the outcomes.



- The Principal will put such outcomes in place.
9. If an investigation by an outside investigator is decided to be appropriate:
- The outside investigator will be engaged as the Complaint Case Manager
  - The investigator will attend the College to interview both parties and relevant witnesses as nominated by complainant, respondent and investigator.
10. Where a formal complaint has been lodged, the following type of evidence may be relevant, or required.
- Supporting evidence provided by a medical practitioner, counsellor, family member, friend or co-worker.
  - Supervisor's report and personnel records (e.g. sudden increase in sick leave).
  - Complaints or information provided by other employees about the behaviour of the alleged person causing the concern.
  - Records kept by the person who has the concern.
  - Whether the parties presented the evidence in a credible and consistent manner.
  - The absence of evidence where it should logically exist.
11. The investigator will provide a report of the investigation including recommendations to the Principal.
- The report is privileged to the Principal and Executive Management Committee.
12. The Principal will:
- Decide on the most appropriate outcomes in view of the report and recommendations
  - Inform the Complainant and the Respondent of the outcomes
  - Put in place any outcomes of the investigation. These may include disciplinary outcomes for staff and students.

Outcomes may include any combination of the following:

- Counselling
- Disciplinary action against the person complained about (e.g. demotion, suspension, probation or dismissal)
- Official warnings that are noted on the personnel file
- Disciplinary action against the person who complained if there is strong evidence that the complaint was vexatious or malicious
- Formal apologies
- Reimbursing any costs associated with the issue of concern.

Outcomes decided upon will depend on factors such as:

- The severity and frequency of the issue causing concern
- The weight of the evidence
- The wishes of the person who is making the complaint
- Whether the person causing the problem could have been expected to know that such behaviour was a breach of policy/unprofessional conduct
- The level of contrition

- Whether there have been any prior incidents or warnings.

NB: There may be times when a complainant does not want to continue with any process or investigation. If the issues raised are such that the health and wellbeing of staff or students is being adversely affected, the College reserves the right to instigate an investigation, irrespective of the wishes of the complainant or other parties.