



For Christ's Crown & Covenant

Complaints Procedures

Operational

Version 2: 25 July 2023

INTRODUCTION

Complaints handling is a key governance tool. Effective management of complaints will protect relationships within the school community; improve the school's services and performance; highlight key risks within the school; and enhance the decision-making capacity of the Senior Executive and School Council.

The school seeks to respond to complaints in a professional, timely and appropriate way, promoting continual improvement.

DEFINITIONS

Complaint: an expression of concern, dissatisfaction or frustration with the policies, procedures or service provided by the school, or the conduct of an employee. Complaints may be oral or written.

Complaints may relate to:

- student safety and wellbeing
- student disciplinary procedures
- schoolwork
- quality of teaching
- student bullying
- school management, policies and procedures, and school fees
- breach of privacy
- School resources
- work health and safety issues
- breach of a relevant law
- School Chaplaincy

Misconduct or Corruption Allegations: complaints alleging misconduct or corruption which may involve issues of probity or other matters which have the potential to seriously compromise the school's professional reputation. Examples include:

- Theft or misuse of resources
- Corrupt behavior
- Behaviour which is in breach of legislative requirements or school policy, or which may otherwise be detrimental to the reputation of the school

Procedural Fairness: refers to a person who is the subject of an allegation being given an opportunity to defend themselves and raise any other mitigating circumstances before a decision is reached. This term is also often referred to as 'natural justice'.

Reportable Conduct Allegation: a complaint that relates to specific behaviour under the ACT Reportable Conduct Scheme. Examples include:

- Sexual offences and convictions
- Offences against a person including physical assault
- Reportable convictions
- Offences relating to providing a safe environment for children
- Ill-treatment of a child
- Psychological harm
- Misconduct of a sexual nature

Whistleblower: a person, whether a staff member, Council member, volunteer, student, parent or carer, who exposes any kind of information or activity that is deemed illegal, unethical, or not correct within the School.

Exceptions

This Procedure applies for all circumstances except the following:

- Suspected risk of harm, or risk of significant harm to a child, which is addressed according to procedures set out in the Child Protection Policies
- Performance and discipline of employees, which are managed by processes set out in the relevant staffing documentation, and
- Requirements of any other industrial or legal instruments.

PROCEDURES

1.1 Receiving Complaints

- (a) Staff receiving complaints over the phone, or verbally, should note: name and contact details of person making complaint, nature of complaint, desired outcome/ resolution. (e.g. use Complaints Form in Appendix / Google Docs)
- (b) Written or emailed complaints should be retained with the file of the complaint, along with any other information.
- (c) Complaints which need referring should be directed to the person about whom the complaint is made; or as indicated by the person making the complaint.
- (d) Completed Complaints Forms, or non-directed complaints, should be forwarded to the Business Manager. Confidential or sensitive complaints should be sealed in an envelope marked 'Confidential'.
- (e) The staff member dealing with the complaint shall maintain good communication with complainants, and seek to finalise the matter as quickly as possible.
 - If a complaint is received in writing, acknowledge receipt.
 - Outline how the complaint will be handled.
 - Offer a time frame (within a week) for responding to the complaint.
 - Contact the person again if the resolution will be delayed.
- (f) All staff members receiving complaints must retain confidentiality about the issue and the person making the complaint.
- (g) In addition, whistleblowers, whether these are students, parents/carers or staff, must be protected from retribution as far as is reasonably practical.

1.2 ELC Complaints

Complaints about any aspect of the ELC, should be raised with an educator or the Director of the ELC.

Complaints that relate to issues such as fees, waiting lists or priority of access to services should be directed to the Principal, Covenant Christian School.

Complaints which relate to:

- the safety, health or wellbeing of a child or children was or is being compromised while being educated and cared for by the ELC; or
- the National Law and/or National Regulations have been contravened

must be investigated, but also be reported to the ACT Regulatory Authority, Children's Education and Care Assurance (CECA).

Parents may also choose to make direct contact with CECA via the complaints dedicated telephone line (02) 6207 7581 or email complaints_CECA@act.gov.au

1.3 Assessing Complaints

A process shall be determined to deal with the complaint by:

- (i) Assessing the seriousness of the complaint:
 - Level 1 – simple; resolved at first point of contact
 - Level 2 – more complex; requires consultation/ further inquiry
 - Level 3 – serious matters; significant or legal implications
- (ii) Assessing the appropriateness of each option for resolution
- (iii) Keeping the resolution as close to the source of the complaint as possible

1.4 Record keeping

Records shall be kept of every complaint, including: the description of the complaint, supporting documents if any; notes of informal discussions; immediate action taken; and outcomes. (See Summary Table below)

Records will be kept at the School in a secure access file.

Level 1 Complaints:

Personal staff files/ day books

Student issues are noted on FACTS

Level 1 complaints may be logged at the Director of Studies' (DoS) discretion.

Level 2 Complaints:

Records of complaint filed by name/ date the complaint was received the Complaints Register on Google Docs.

Summary logged by DoS on the Complaints Register on Google Docs – also reference to Complaints File where the complaint form and any information or correspondence is saved.

If complaints involve student issues – reference on FACTS to Complaints File and the Complaints Register.

Level 3 Complaints:

If the complaint is investigated, documentation relating to the investigation and/or review segment of the process will be kept in a restricted access file.

Records of complaint filed by name/ date the complaint was received in a secure file on *Google Docs*.

Summary logged by Business Manager on the *Complaints Register*

These records must be kept permanently.

1.5 Complaints Log or Register

Level 2 Complaints should be recorded on the Complaints Register.

Level 3 Complaints are recorded on the Complaints Register.

Entries should be made as soon as practicable after the matter has been reported to the School. The status of the process is indicated, and the date of finalization inserted when complete.

Complaints shall be classified and analysed to identify systemic, recurring and single incident problems and trends in order to identify key risk areas, and help eliminate the underlying causes of complaints through corrective actions.

1.6 Reporting

Level 1 Complaints

Report to the Director of Studies (DoS) or immediate supervisor regularly to identify any patterns of issues or problems occurring.

Level 1 complaints may be entered into the Complaints Log if the DoS considers it necessary.

Level 2 Complaints

Reported to the Director of Studies or immediate supervisor as soon as practicable to facilitate rapid resolution.

Level 2 complaints would usually be entered into the Complaints Log.

Level 3 Complaints

The Principal shall report to the School Council with respect to:

- all Level 3 complaints
- the status of other existing complaints
- summarizing complaints by key stakeholders
- analyzing any particular trends or systemic issues, and
- corrective actions that have been put in place.

1.7 Complaints Summary

Level	Description	Report to	Records	File
1	Simple, minor matters Generally dealt with at point of contact	Director of Studies/ or Immediate Supervisor	Keep notes All student issues	Staff member's personal file PCSchool
2	Unable to be resolved at point of contact and/ or require consultation Escalated issues More serious matters or potential consequences Legislative implications or potential e.g. WHS, anti-discrimination acts, Privacy, safety of ELC children, or breach of National Standards or Regulations relating to the ELC Requires investigation	Director of Studies or Immediate Supervisor; or Business Manager	Keep file of complaint, other evidence, discussions, investigation, actions taken Coordinator/ Exec maintain log	Google Docs Reference student matters in FACTS Confidential Google Docs drive
3	Escalated complaint without resolution Repeated complaints Major legislative implication e.g. anti-discrimination acts; WHS; Education Act; Privacy; crime, safety of ELC children, or breach of National Standards or Regulations relating to the ELC Requires significant investigation Requires involvement of Principal Principal reports to Council May require external agency referral, investigation or review If ELC-related, likely to require report to the ACT Regulatory Authority, CECA. May require legal advice/ action	Director of Studies or Immediate Supervisor; Senior Executive; Council	Keep file of complaint, other evidence, discussions, investigation, statements, proceedings, actions taken Business Manager maintains register	Confidential Google Docs drive Complaints Register Reference student matters in FACTS if relevant

1.8 Protections for Whistleblowers

The School supports the inclusion of whistleblower protections for complaints and grievances. These protections are:

- confidentiality and anonymity for the whistleblower
- the provision of a supportive environment
- protection from harassment, retaliation and victimisation, and
- not subjecting whistleblowers to disciplinary action for “blowing the whistle”.

1.9 References:

Children's Education and Care Assurance (CECA), ACT Education Directorate
<https://www.education.act.gov.au/>

Complaints Policy

Reportable Conduct Policy and Procedures [link](#)

AS/NZS 10002:2014 Quality Management - Customer Satisfaction: Guidelines for Complaints Handling

Whistleblower Protections Act 2019

APPENDIX - COMPLAINTS HANDLING: AUSTRALIAN STANDARD

AS/NZ 10002-2014 Quality Management - Customer Satisfaction: Guidelines for Complaints Handling - is currently recognised by government, non-government and business organisations across Australia.

The objective of the Standard is to provide guidance on complaint handling related to products or services within an organisation, including planning, design, operation, maintenance and improvement.

The Standard defines a complaint as:

[An] expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

A 'complaint management system' encompasses all aspects of the policies, procedures, practices, staff, hardware, and software used by an organisation for the management of complaints.

The Standard outlines guiding principles for effective complaint management. In summary, they are:

Enabling complaints

- People focus – everybody has a right to complain; a people-focussed and proactive approach to seeking feedback and complaints is required from the organisation
- Ensuring no detriment to the complainant – no detriment should be suffered by the complainant for making a complaint
- Visibility and Transparency – there should be well-publicised information about how and where a complaint can be made to the organisation
- Accessibility - the organisation should ensure that its complaint management system is accessible to everyone, particularly people who might require assistance
- No charges – no fees are to be charged for making a complaint

Managing complaints

- Responsiveness – the organisation should promptly acknowledge each complaint received and assess and advise complainants about process and timelines
- Objectivity and fairness – each complaint should be managed by the organization in an objective and unbiased manner; conflicting interests should not interfere with, or be perceived to interfere with, the management and resolution of complaints
- Equity – complaints should be addressed in an equitable manner and in accord with the organisation's complaint management policy; policy should address the issue of unreasonable complainant behaviour
- Privacy and disclosure – personal information about any individual should only be disclosed or used in compliance with relevant privacy laws and ethical obligations
- Communication – to facilitate early resolution, the organisation should provide explanations for policies/procedures and decisions in its communication with complainants, particularly for the benefit of frontline complaint handling staff

Managing the parties

- Conduct of parties – the organisation should make clear in complaint management policies/procedures the behaviour expected of both its staff and complainants

- Work health and safety – the organisation should develop policies/procedures to ensure the health and safety of complaint handling staff
- Complaint involving multiple parties – where a complaint involves multiple parties or multiple areas within the organisation, communication and information exchange should be pre-arranged and coordinated to facilitate investigation and response to a complaint
- Empowerment of staff – the organisation should empower staff to implement the complaint management system relevant to their role

Accountability, learning and prevention

- Accountability – the organisation should ensure that accountability for the operation of its complaint management system is clear
- Continuous improvement – responding to and learning from complaints is essential for the organisation's commitment to continual quality improvement
- Prevention of ongoing disputes – the organisation should develop and implement systems to prevent complaints escalating into ongoing disputes.

In addition to these principles, most complaint handling procedures should stipulate that reasonable efforts should be made to investigate all relevant circumstances and information surrounding a complaint; and that appropriate corrective action or resolution is important to closure if a grievance is found to be justified.

The Standard also looks to:

- encourage development of organisational complaint management systems that include appropriate policies and procedures, clear lines of responsibility, and appropriate delegations
- assign responsibility to the Chief Executive and other senior managers for the organisation's complaint management framework
- establish reporting to senior management on significant complaints and systemic issues or trends identified through the receipt of complaints and service problems, with recommendations for improvements where appropriate
- organisational planning for the identification and allocation of resources needed for an effective and efficient complaint management system.

The Guidelines document includes information to aid the effective implementation of the Standard. Advice is provided in relation to issues such as data collection, unreasonable complainant conduct and the use of apologies and other options for redress.

There is also recognition that many small organisations will receive few complaints, and have limited resources to set up and maintain a complaint management system. The Standard highlights key areas where small organisations can focus their attention to achieve maximum effectiveness and efficiency in their complaint management system.



Covenant Christian School Complaint Form

YOUR DETAILS	
Family name	Given name(s)
Address	
Contact number	
Email	
PLEASE GIVE DETAILS OF THE COMPLAINT	
(Attach additional page and/or further documentation if you wish.)	
PLEASE GIVE DETAILS OF THE OUTCOME YOU ARE SEEKING	
(Attach additional page if space is insufficient.)	
HAVE YOU PREVIOUSLY RAISED THIS CONCERN WITH A STAFF MEMBER? (TICK)	
No <input type="checkbox"/>	Yes <input type="checkbox"/>
<i>If yes, when:</i>	
Who dealt with the matter?	
What was the result?	

Signature: _____ Date: _____

Please return this form addressed to the Business Manager

<i>Office use only</i>										
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COMPLAINTS REGISTER

Filed in the School Executive Folder

No. (yr/00x)	Date of Complaint	Complainant Name	Received by	Complaint	Category	Action Taken	Status/ Date Finalised	Further Recommendation	Complaints File Ref:

COMPLAINTS REGISTER

Filed in the School Executive Folder

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