



Swan Christian
EDUCATION ASSOCIATION

Complaints Management Policy

Published 10/12/2018
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Policy Details and Document Management

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Approved by: Board

Published: 10/12/2018

Review Due: 10/10/2025

Policy Level		Dissemination	For Application	For Information
Board	<input checked="" type="checkbox"/>	Board	<input type="checkbox"/>	<input checked="" type="checkbox"/>
CEO	<input type="checkbox"/>	CEO	<input checked="" type="checkbox"/>	<input type="checkbox"/>
School	<input type="checkbox"/>	Executive Administrators	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Access		All Staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Open	<input checked="" type="checkbox"/>	Association Members	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Restricted	<input type="checkbox"/>	School Members	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Public	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Revision History

Published	Version	Approved By	File Name
15/01/2019	1.0	CEO	15/01/2019
	1.1		06082019 (flowcharts and related text updated)
	1.2		26112019 (updated to align with 2020 Registration Standards) Reviewed 06102020 – SLT Changes made to Internal complaint Lodgement Process (p.8) to align with flowchart Appendix 4 (p.23) Grievance Committee Terms of Reference and procedure added (Appendix 6)
	1.3		02032023 Clarity differentiating between concern and complaint made including implications for record management and monitoring (p.7,9) Ratified by Board 26042023

Genealogy

This Policy replaces: A range of policy excerpts

This Policy was cancelled and superseded by: N/A

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Preamble

“Do not accuse a man without cause, when he has done you no harm” Proverbs 3:30

“If you are offering a gift at the altar and then remember that your brother or sister has something against you, leave your gift before the altar. First go and be reconciled to your brother, then come and offer your gift” Matthew 5:23, 24

Swan Christian Education Association (SCEA) is committed to providing and maintaining best practice in corporate governance, compliance and ethical behaviour.

This policy addresses our commitment to provide an open environment and a defined framework in which Board and association members, employees, parents, children and students, contractors, and service providers can raise concerns regarding unethical, unlawful or undesirable conduct without fear of retaliation.

Background

All Non-Government schools in Western Australia are legally required to have in place and implement a policy and procedures for complaints management. The implementation of an effective concerns and complaints policy and procedure serves to:

- provide and enable access to an open and responsive complaints’ handling process, for all within the school community, including a child-friendly process for students, as well as for those outside the community;
- ensure that complaints are dealt with in an expeditious and fair manner and do not escalate unreasonably;
- enhance the school’s ability to resolve complaints in a consistent, systematic and responsive manner;
- enable and encourage staff to improve their skills in complaints’ handling and recording;
- provide the school with helpful information to assist in the identification of trends and eliminate causes of complaints;
- provide a basis for continual review and analysis of the complaints’ handling process, the resolution of complaints and required improvement;
- ensure that the necessary improvements are implemented; and
- foster positive relationships and good channels of communication with students, parents, guardians, staff and others.

The Western Australian *School Education Act (1999)* includes a Non-Government school registration standard that relates to *‘the response to, and recording of, complaints and disputes at schools.’* Sec 159(1)(k). The requirements of this standard (9) are reflected in the *Guide to the Registration Standards and Other Requirements for Non-Government Schools 2020*, as described below:

Standard 9: Complaints

- 9.1 *The school has and implements a complaint-handling system which satisfies each of the key action areas of Principles 6 and 9 of the National Child Safe Organisations Principles: 6. Processes to respond to complaints and concerns are child focussed, and 9. Implementation of the national child safe principles is regularly reviewed and improved*
- 9.2 *the school's complaint handling system conforms to the rules of procedural fairness and includes a system of review*
- 9.3 *the school publishes information to the school community about the role of the Director General of Education in monitoring the school compliance with these standards including, but not limited to, standards 9.1 and 9.2 and her authority to respond to instances of non-compliance*

Purpose

The purpose of this policy is to ensure that people (including children) can raise concerns in good faith regarding actual or suspected improper conduct by an employee or someone who works with SCEA, without fear of reprisal.

The policy aims to:

- encourage employees to report an issue/lodge a complaint in good faith if they genuinely suspect improper conduct;
- outline how SCEA will deal with all reported suspected cases of misconduct;
- assist in ensuring that serious misconduct is identified and dealt with appropriately;
- support schools to develop and implement a child-friendly complaints system.

Scope

This policy applies to all SCEA Board Directors, employees at SCEA, whether full time, part time or casual at any level of seniority, including contractors as well as service providers, students and parents. The Board and Leadership Team encourages people to report any genuinely suspected improper conduct as it gives SCEA an opportunity to take corrective measures to remedy it.

Definitions

Concern

A concern is the expression of a worry, something that has made a person troubled or anxious about an issue and is usually expressed as a 'first level' worry i.e. to a class teacher at the classroom door or by telephone or email directly to the relevant staff member. Depending on the nature of the concern, it can often be resolved at this 'first level' in an informal manner. A concern regarding a child safety or child protection matter should be treated as a 'first level complaint'. NB: It would be prudent for the teacher or staff member concerned to make and file a brief note regarding the issue and interaction. This will assist in case of future escalation and in the identification of patterns emerging over time. (Those relating to child safety or child protection matters should be recorded on the complaints register).

Complaint

A complaint is 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' (as defined by the *AS/NZS 10002:2014 Guidelines for*

Complaint Management in Organisations). Within a school this would usually equate to an expression of protest, objection, dissatisfaction with a real or perceived problem, accusation, or criticism and is usually dealt with in a formal manner. More commonly a complaint would be expected to be in the form of a written communication, a letter or email, addressed directly to the relevant staff member, their supervisor, and finally the Principal. However, it should be noted that complaints, of a serious nature, may also be made verbally (in person or by telephone) and it would be inadvisable for a school to dismiss the matter because 'it wasn't written down.'

Grievance

A grievance is a belief

- by an employee that their complaint about treatment in the workplace has not been treated seriously or has been mis-handled by the school and/or CEO resulting in the complainant still feeling aggrieved; they should complain in writing to the Board who may engage the Grievance Committee to review processes used (see Appendix 4)
- by a parent and/or association member that their complaint about their school or an association matter has not been objectively handled or resolved by the school principal resulting in the complainant still feeling aggrieved – they should lodge a complaint with either the CEO or Board Chair in writing (see Appendix 5). The Board may engage the Grievance Committee to review processes used.

Complaint Lodgement/Reporting

For the purposes of this policy and procedures the term 'reporting' will be used broadly to mean 'lodging a complaint'.

Good Faith

Good faith is evident when a report is made without malice or consideration of personal benefit and the person has a reasonable basis to believe that the incident is true. A report does not have to be proven to be made in good faith. However good faith is lacking when the complaint is known to be malicious or false.

Culturally Safe Complaints Management

A culturally safe environment for making a complaint includes the cultural group's own assessment of their safety and capacity to engage meaningfully on their own terms with a person from a different cultural group. For an Aboriginal or Torres Strait Islander person (Australian Indigenous person) this means with a non-Indigenous person or organisation.

Guiding Principles

This policy and its procedures, is based on the following principles:

- The safety and educational wellbeing of children and young people is our first priority.
- Students, parents, staff, volunteers and contractors have the right to be treated with respect and courtesy.
- Parents have the right to raise concerns and complaints about their school or preschool life and be supported to do so, regardless of their cultural background
- Wherever possible, students, parents and staff complaints should be resolved at the school (or preschool) level.

- Complaints will be considered in a confidential, timely and impartial manner and in accordance with due process and principles of natural justice, underpinned by Biblical principles.
- The rights and responsibilities of all parties should be considered and balanced in finding a mutually acceptable outcome to complaints.
- Complaints are monitored, and their management evaluated so as to inform and drive SCEA system and performance improvement.

Policy Statement

SCEA Office and school sites will:

- Act in partnership with parents, staff, and volunteers, to deliver education and care that is of the highest quality, to students,
- Provide working and learning environments that are safe, fair and just
- Actively promote the development of positive and respectful relationships and seek to minimise the incidence of conflict that might otherwise give rise to a complaint
- Record concerns made by parents, community members and staff regarding student safety and child protection; these will be recorded in the school complaints register to enable immediate resolution where possible, a 'watchful eye' being kept on the matter, professional awareness being generated concerning the matter, not only to minimise escalation to complaint status, but to ensure inclusion in regular monitoring and analysis of complaints in the register
- Act on and report immediately any situation concerning a breach of the SCEA Code of Conduct (including for parents, students and volunteers) or contravenes SCEA's Statement of Commitment to Child Safety
- Attempt to resolve complaints in a safe, respectful and supportive way
- Maintain clear and timely communications and accurate record keeping in complaints management at both SCEA Office and school sites.
- Regularly review complaint records – including concerns - to determine and address patterns which may emerge

In addition, schools will

- Develop, as a priority, a *Child-Friendly Complaints System*, including procedures and practices that are child-focused and suit their specific school site, and in particular, are culturally safe and accessible by all children and young people.
- Review their *Child-Friendly Complaints System* periodically

Complaints Handling Procedures

Positive and respectful relationships

Schools and SCEA Office have an open, caring approach to relationships between members of their communities and the association, based on biblical principles. They are open to receiving complaints (and positive and negative feedback) so that they can maintain this approach and continue to strive for improvement.

Making a complaint

A complaint may be made if a complainant thinks that the school, SCEA Office, or someone from the SCEA broader community has, for example:

- done something wrong;

- failed to do something it/they should have done;
- acted unfairly or disrespectfully; or
- ignored their concern.

A complaint may be made about the SCEA Office as a whole, about a specific team in the Office, about a particular Office activity, or about an individual member of the Office staff.

A complaint may also be made about a school as a whole, about a specific department in the school, about a particular school activity, about an individual member of staff or about one or more students.

Taking a calm, positive approach to concerns and complaints and treating them as constructive suggestions can help to diffuse angst, the potential for acrimony and escalation. The receipt of a complaint, even an unjustified complaint, can be helpful to any part of SCEA in that it may indicate an area that can be improved.

If you become aware of any matter which you think contravenes the SCEA Staff or Student Codes of Conduct, SCEA or school policies, or the law, then you have the option of reporting it **internally** as indicated below. If you would prefer to make an anonymous report you can contact Beeson HR Consulting's Whistle-blower Service which is an **external**, independent agency appointed by the SCEA Board to assist you in reporting your concerns. (See Whistle-blower Policy).

The Role of the SCEA Human Resources Office

The role of the Chief Human Resources Officer (or other HR Team members as appropriate) is to provide advice about dealing with complaints under the policy/procedure. Advice may be provided to the complainant, respondent or to the complaint handler, subject to any conflict of interest. The role of the Chief Human Resources Officer will be strictly limited to an advisory capacity, unless instructed to engage directly in the handling of the complaint by the Chief Executive Officer.

Internal Complaint Lodgement/Reporting Procedure

Internal reporting of a suspected breach of the SCEA Code of Conduct should be kept at the lowest reasonable level in the following chain:

- your immediate supervisor or,
- their manager or,
- your Principal (for schools)

If you are a SCEA employee, volunteer or private contractor, and the matter concerns or is about someone in this chain of command, then a complaint/report should be made to the next person in the chain. (See Appendix 1 for details on a suggested structure for developing a report for a complaint).

If you feel that you are aggrieved against the school or Principal, or you believe that your complaint has not been treated seriously or is still unresolved, you should consider sending your complaint to the CEO who will investigate it (see Appendix 4), or reporting your grievance to the Whistle blower if you wish to remain anonymous (see Appendix 2).

If you are a parent and/or association member unhappy with a situation in a school, you are encouraged to initially discuss the matter directly with the person with whom you have an issue and attempt to resolve the matter. If this does not eventuate you should consider asking the school

principal to mediate or arbitrate. If the matter remains unresolved and you still feel aggrieved, you should forward your complaint to the CEO who will investigate the matter and make a formal ruling. If you believe the matter has still not been resolved you should lodge a grievance with the Board. The matter will then be handled by an the SCEA Grievance Committee, external to the school (see Appendix 5).

The Grievance Committee will consider the processes used in the CEO's investigation and provide a report to the Board on their finding. The Board Chair will then make a final ruling on the matter. (Grievance Process.Appendix 6)

The Role of the Director General

Schools should publish the following statement to their school community concerning the role of the Director General

“The Director General of the Department of Education is responsible for ensuring that the school observes the registration standards, including the standard about its complaints handling system. Any student, parent or community member is entitled to contact the Director General with concerns about how the school has dealt with a complaint. Information is available on the Department of Education website¹. While the Director General may consider whether the school has breached the registration standards, she does not have power to intervene in a complaint or override the school's decision.”

External Reporting Procedure

In the event you are not comfortable lodging a complaint internally, you can confidently and easily report it to the company's external independent Whistle-blower Service, at a time convenient to you, without fear of identification, retribution or reprisal.

Reporting to the external Whistle-blower Service can be done by calling the Hotline Number (see Appendix 2)

To protect the confidentiality of the information you can:

- remain completely anonymous; or
- disclose your identity only to the Whistle-blower Service and they will not disclose your identity to SCEA until they have your permission or until required by law; or
- disclose your identity to both the Whistle-blower Service and to SCEA.

Good Faith vs Malicious Reports

Anyone making a report must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a wrongdoing. While reports can be anonymous, any allegations which prove to have been made maliciously or knowingly to be false will be investigated and viewed as a serious disciplinary offence. No action will be taken where the report was made in good faith, but no wrongdoing was identified.

Consent and Confidentiality

SCEA may have to disclose the information you have provided to regulatory authorities without your consent.

Accessibility

¹ www.education.wa.edu.au/non-government-school-complaints

Information about the school and SCEA Office' complaints processes (including flowcharts) should be made available through a range of media. For example: on the SCEA/school website; in school newsletters, on posters and in parent/student handbooks. Accessibility for students might include posters (see Appendix 3, pp. 20,21). discussions in pastoral care groups, signs on office doors, etc.

Members of staff are encouraged to deal with parental concerns that lie within their area of responsibility. If approached about an area outside their responsibility, they should direct people to this policy and advise them of the next step.

Some complainants will wish to go straight to the principal with their concerns, and this should be respected. However, staff should be made aware that the principal will more than likely discuss the matter with others on the chain of command who can help and/or are involved.

Fairness

Fairness must be accorded to both the complainant and the person against whom the complaint is made. It requires that²

- Each party has an opportunity to be heard, in person or in writing, and to respond to the allegations and/or evidence offered by the other;
- Issues or facts which are disputed are investigated;
- The investigator is free from bias or the perception of bias and, in particular, does not make a judgement to serve their own ends;
- Any complaint outcome is supported by the evidence, necessitating a finding on the balance of probabilities in the event of a dispute or fact;
- The complaint outcome is finalised by an impartial adjudicator, who may also be the investigator, who is free from bias or the perception of bias; and
- The outcome is consistent with established SCEA Office or school policy.

Note that if either complainant or the person against whom the complaint is made is not happy about the initial outcome or the process used, they might contact the person next in the chain of command and request that the decision be reviewed. (See Appendix 4)

Responsiveness and Timeliness

The SCEA Office and schools should aim to reduce the anxiety of the complainant by initially being open to the receipt of the complaint and taking the matter seriously and dispelling uncertainty about how it will be resolved. This can be achieved by:

- Acknowledging the matter immediately or, for a written complaint, within 5 days of receipt
- Confirming the nature of the matter and the complainant's concerns
- Providing assurance to the complainant that the matter will be taken seriously, and
- Keeping the complainant informed on what is happening in the process. The issue should be dealt with as quickly as possible.

Confidentiality

The question of confidentiality should be discussed with sensitivity, depending on the nature of the complaint. The policy should be carefully explained, particularly if there is risk of harm to anyone involved.

² Taken from Standard 9, Guide to Registration Standards and other Requirements for non-Government Schools, 2020)

Every complaint must be treated in a respectful and confidential manner. Parents, in particular, often request assurance that their child will not suffer as a result of their complaint. Similarly, staff seek assurance that their employment, reputation and treatment will not be adversely affected as a result of their complaint while students often fear that other students will suffer as a result of their complaint. Fears of any retribution or adverse repercussions should be clearly and respectfully allayed. Training offered by the SCEA Office or school leaders should help staff deal with complaints made to them or about them. Schools must be prepared to offer support to staff against whom a complaint has been made.

If there is a situation involving the Police, then the Principal or their delegate (if Principal is not available), must take responsibility for the action to be taken within the school and the CEO should be informed as soon as possible.

Training

SCEA Office and Schools should offer awareness training to ensure that all staff, including support staff, carry out their responsibility to support and implement this policy. Training should cover:

- The documented complaints procedure and what information to give complainants;
- Knowing how to recognise complaints and be proactive in responding promptly and appropriately to expressions of dissatisfaction, in accordance to the policy;
- Complaints that are associated with child protection matters;
- Staff members roles, responsibilities and authorities in respect to complaints
- Communication skills such as listening, questioning and calming;
- Respectfully and courteously handling complaints, negotiation and mediation skills;
- Skills in observing, recording and reporting; and
- The benefits of handling complaints well and the consequences of handling them badly.

Redress

Sometimes putting something right in relation to a complaint may be challenging or seemingly impossible. Organisations may choose to seek legal advice on options for rectification or redress in these situations. Some options might include:

- Mediation between parties
- Making changes to processes and procedures to make sure the problem does not reoccur
- Waiving fees, charges or debts (for parents)

Keeping Records

SCEA Office and schools need to keep records of complaints, reports and allegations received, actions taken, decisions made and outcomes. Records should contain simple but clear notes of all communication with the complainant, including friendly chats and telephone conversations, as misunderstandings can easily arise. There should be a clear statement of what is concerning the complainant. Such notes can be agreed with the complainant.

It is important that the SCEA Office and each school develops a procedure for identifying, gathering, classifying, maintaining, reviewing, storing, securing and disposing of complaint-related records. Complaints and allegations must be recorded in such a way as to enable the detection of any patterns emerging over time. Training for staff on the school's dedicated complaint recording process is vital for consistency.

Methods for recording complaints, reports and allegations must be in such a way that makes for ease of review and identifying patterns. This may translate to the maintenance of a spreadsheet containing relevant *summary* information, separate from each confidential file on individual matters.

At a minimum, the register/log should contain the following information:

- date when the issue was raised and to whom it was raised;
- name of complainant and relevant parties involved;
- brief statement of issue;
- name of staff member handling the issue;
- name of the person/member of staff responsible for reviewing any decision made;
- brief statement of outcome including date of resolution/outcome;
- date of closure of the matter
- any referral to the SCEA Board of Directors; and
- location of the confidential detailed file (if applicable).
- information must be retained permanently for students of indigenous origin or in out-of-home care and for other students for a period 75 years from the date of birth of the student. For matters related to child protection (suspected harm or risk of harm to a student), all information must be retained permanently.

Child-friendly Complaints System for each SCEA school - Guidelines

1. Background

It is well recognised that “empowering children and young people to understand their rights, to report problems and concerns and effectively support them to address the issue raised is critical. Taking children and young people seriously if they raise a matter of concern and ensuring that staff and volunteers have appropriate training and processes to ensure that such matters are dealt with effectively”³ is of paramount importance.

Schools will develop a **Child-Friendly Complaints System** that ensures that their students' views are heard, their rights respected, and their safety and wellbeing prioritised, They will do this by building a complaints system that is accessible and responsive to the needs of children and young people.⁴ Schools will also ensure that students' parents/guardians are familiar with the school's child friendly process, so that they can support their child in the expression of a concern or complaint, as necessary.

2. Six Key Elements of a school's child-friendly complaint system

The child-friendly complaints system in the school should include the following key elements:

One: Focus on children and young people

Ensure children and young people in the care of adults are acknowledged as the key users of the education services provided, in policies and procedures.

Two: Visibility

Publicising complaints systems need to include strategies that are effective in communicating with young people and children such as SMS, email, telephone.

Make sure children and young people are invited to make comments; put a sign on the door in big, bold letters for example, saying “*Come and talk to us anytime*”. Make sure they know they have a right to complain by, for example, putting a few facts on a card. Keep written communications bright and appealing. Make sure they are age-appropriate (e.g. with different language and graphics). Use relevant technology to engage them such as on-line surveys, SMS functions.

Three: Accessibility

Make sure children and young people know who they can make a complaint to, and how.

Your system should have a number of methods for lodging a complaint including the opportunity to talk to someone face-to-face and that they are accessible and available. Make 'comic-strip-style' publications outlining the process and steps for making a complaint using key messages that are age-appropriate.

Make sure the school has an opportunity for children to use an advocate to make a complaint, but they know that they can do it themselves if they want to.

³ Taken from Summary – [Creating Child Safe Organisations Report on Consultation with Children and Young People June 2015](#), WA Commissioner for Children and Young People

⁴ WA Commissioner for Children and Young People – [Complaints Guidelines](#)

Four: Responsiveness

Staff should be trained to respond quickly once children have complained. Child safety is paramount; time can be precious in keeping children safe.

Makes sure staff involved in dealing with child complaints are experienced, caring, understanding and responsive. They should check that children and young people understand information provided and are invited to ask questions. They should be asked to choose how they would like to be informed of progress regarding the investigation of the complaint

Five: Confidentiality

Children and young people often don't make complaints due to concerns about this. This becomes complex when children and young people are involved. Staff cannot agree to a student's demands for confidentiality or requests that parents, police or other agencies not be informed when the welfare or safety of the student or other students may be threatened. Staff should clearly explain this to students at appropriate times throughout the complaints process.

Six: Accountability and Continuous Improvement

It is important that the specific needs of children and young people are recognised in accountability and continuous improvement processes. Ensure that appropriate data is kept enabling reporting of complaints of children and young people.

3. Dealing with student complaints

The principles that apply to parental complaints are applied to concerns and complaints from students (see p.7).

Child-friendly approaches

Students are able to raise concerns with any member of staff with whom they feel comfortable. The process will be included in student handbooks, simple flow diagrams are used, e.g. on posters etc. Schools will develop and hang their own site-specific posters of how children and young people can make a complaint. These should be placed around the school. (An exemplar/template is found at Appendix 3, p.20/21)

Retaining Anonymity

Some students will want to make a complaint anonymously. They can do this by phoning or emailing a Whistle-blower. Schools will advertise their own or SCEA's Whistle-blower process which should be included in their student Handbook (Exemplar at Appendix 2).

Taking children's complaints seriously

Complaints that appear trivial will be handled seriously. Young people may test the complaints procedures on relatively minor issues before finding the confidence to raise something painful, such as bullying. The school will be responsive, by promptly acknowledging the complaint and treating the student with understanding and helpfulness.

Do they want an advocate?

A student may need a person to complain on their behalf but should also be given the option of participating directly, to the extent they desire. In making a complaint themselves, a student may need/want support from another student or from an adult. Students should be encouraged to choose a person with whom they feel comfortable to provide support. The school will consider providing students with an advocate, independent from the complaint investigation and

management process, when they do not have one. (*Guide to Registration Standards January 2020*)

Keeping students updated on progress

It is expected that a student is also given a choice on how they wish to be kept updated on the progress of their complaint. Provision for confidentiality of the student's complaint, as well as for making the student aware of the limits of confidentiality as the process progresses, will be made.

Informing students of the outcome

Once the matter is resolved, the outcome will be discussed with the student by a member of staff. To make sure that it is fully understood, a written record may be shared. Monitoring by the school will occur to ensure that steps put in place to rectify/assist are having the desired effect.

Referrals

In situations where it is believed that the matter needs to be referred on to an external authority it is essential that, at an appropriate time, the staff member will explain this to the student, from the perspective of being in the best interests of the student's welfare and safety. This sort of situation is handled sensitively and in a supportive manner and the staff member follows the school's policy and fulfils all applicable legal obligations.

Informing parents/carers

The school will decide if the student's parents are to be informed or involved and at what point in the process this should take place, as is appropriate. It should be noted that, in circumstances involving an allegation/complaint related to staff code of conduct breaches, grooming and child abuse, it is required that *'consultation is undertaken with the relevant government authorities to determine when, what and by whom information related to an allegation of child abuse and its investigation may be given, against whom the allegation is made, the complainant and his or her parents/guardians, other affected students and their parents and guardians, and the wider school community.'*

4. Reasons for children and young people not reporting

It is important to be mindful that there are a variety of reasons why children and young people may not report concerns

- not believing their problem is big enough to warrant an 'official' complaint;
- not understanding they are allowed to make a complaint or how to go about it;
- concern about not being believed;
- fear of getting into trouble or getting others into trouble;
- embarrassment or shame;
- worry about confidentiality and privacy;
- fear of repercussions and that things will get worse (especially about bullying).

School staff will be aware of these reasons and support children accordingly.

Promoting a 'Complaint-free' Environment and Culture

Schools should be wary of creating an environment where children complain about whatever they do not like. Although children have a right to complain, they also have a responsibility to support each other in creating an environment where they are so content and happy that they do not feel the need to complain about anything.

Schools should create opportunities for students to do the opposite of complain and teach children that, as part of being a community, they have a responsibility to support each other, thank each other (and staff), and generally be part of a caring community.

For every 'You can complain' poster, for example, schools might have another one that says "Have you thanked someone today?". Schools might teach students – as part of health promotion – to ask, "Are you OK?" if they sense or see someone is down or feeling bad.

There are myriad ways that schools can promote a 'complaint-free' culture and environment. Schools might invite students to be part of this and 'brain-storm' opportunities to support and care for each other.

For an example of a School Child-Friendly Complaints System, see Appendix 6

Reviewing the Child-Friendly complaints system periodically

To review their Child-Friendly Complaints System they will annually use pages 9 &10 of the Commission for Children and Young People Complaints Guidelines retrieved from;

<https://www.cryp.wa.gov.au/media/1414/report-are-you-listening-guidelines-for-making-complaints-systems-accessible-and-responsive-to-children-and-young-people-june-2013.pdf>

To inform this review schools will use feedback obtained from a range of sources including their Annual Student Survey results and those gathered from students concerning the application of their Child Friendly Complaints System in their school.

Policy and Procedures Review

A regular review of both this policy and its procedures will occur. This review will include:

- review of how complaints have been made (analysis of data)
- review of how they have been handled (analysis of reports and data)
- review of procedures in place to ensure confidentiality and prompt responses (review and analysis of data and reports).

Records Management

Records will be regularly maintained, with consideration given to the systems for record management and their ease of use and reliability.

Records will be analysed to reveal patterns, resolution times and on-going disputes in the school.

The School's complaints management systems and records will be additionally reviewed through Non-government Schools Registration processes.

The school will review its Child Friendly Complaints system annually by using the tool provided in *Are you Listening* (pp.10,11):

<https://www.cyp.wa.gov.au/media/1414/report-are-you-listening-guidelines-for-making-complaints-systems-accessible-and-responsive-to-children-and-young-people-june-2013.pdf>

The school will provide this audit to the SCEA Board as requested. The board may ask the schools to indicate how it attends to the requirements of the *Six Key Elements of a Child-Friendly Complaints System* (see p.13).

Further Information

For more detailed information on your obligations, refer to the following policies and documents:

- Corporations Act 2001
- Australian Securities and Investment Commission Act 2001
- ASX Corporate Governance Principals (Principal 7 Recognise and Manage Risk)
- Fair Work Act 2009
- SCEA Staff Code of Conduct
- SCEA Student Code of conduct
- Whistle-blower Policy

Implementation

SCEA Principals will be alerted to this Board policy at a Leadership Team meeting. Implications for their school registration process will be highlighted.

From time to time, principals will be asked to report to the Board on their Child-friendly complaints system.

Aspects of this Policy will be discussed at Staff induction training.

Schools will implement their Child Friendly Complaints System according to their documented system to meet requirements for school Registration.

Contact Officer

Chief Education Officer/ Chief Human Resources Officer

Appendix 1: Structure for reporting a complaint; SCEA Internal Contact Details

The report may be made orally or in written format.

Reporters should try and be succinct and objective in their presentation of the facts. A **suggested structure** for the oral or formal report might be:

- clearly state your name and position
- outline any background information you believe to be pertinent to the complaint
- clearly state your complaint and how the other party has breached the SCEA Code of Conduct; you should have evidence/records of discussions, dates of meetings etc
- make sure your information is factual, objective and not maligning or malicious

A report may be communicated internally in person, by post, over the phone, or digitally using an email. For a grievance

SCEA	To:	Email	Phone
Internal	Your immediate supervisor	As applicable	As applicable
Internal	Their manager	As applicable	As applicable
Internal	Your Principal (for schools)	As applicable	As applicable

Appendix 2: External Whistle-blower Service to whom Whistle-blower reports can be made

(i) (Staff and Parents)

SCEA's dedicated **Whistle-blower service hotline number** is **0487 548 758**.

(ii) (Children and Young People).... Exemplar

For making site-specific and inclusion in student Handbook

What is 'whistle-blowing'?

Telling someone about something bad or wrong that is happening in your school or on a school activity such as a camp, is called 'Blowing the whistle' or 'Whistle-blowing'.

You can do this by calling **0487 548 758** or emailing help@SCEA.wa.edu.au

What to expect?

A person who understands how schools work and knows the rights of children and young people, will take your call/email and get back to you.

They will discuss your concerns with you and

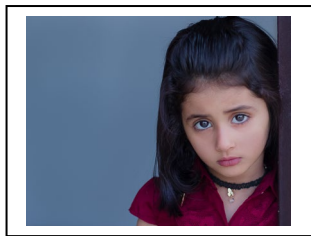
- Talk you through what you need to do next
- Take details of your concern
- Explain the protection available to you if you need it

You don't have to tell us who you are if you don't want to. If you do want to tell us who you are you can ask us not to share this with anyone else.

If you think a child is in immediate danger

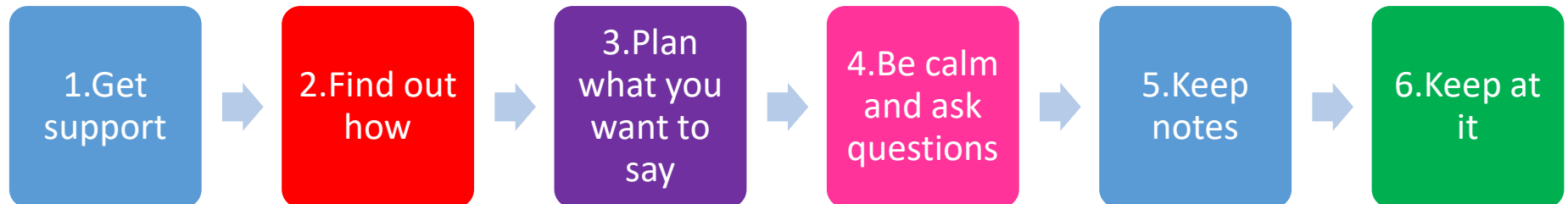
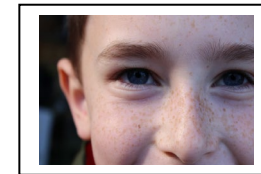
Don't delay – call the police on 000 or call us straight away on 0487 548 758

Appendix 3: Top Tips for Making a Complaint (Children and Young People) *Exemplar*



Southern Hills Christian College

When you want to
Make a Complaint



Are you unhappy about something?
You can talk about it to someone you trust if you want to.

You can complain if you like - take a friend with you if you want to.

Sometimes it is hard to complain about something. Find out who to talk to. You can make a complaint to someone, or by writing or texting, or even phoning. The person in charge of complaints is Chaplain, Kate and her number is

You can go and see her and talk to her or write your complaint on a piece of paper and give it to her.

You can make it anonymous if you like by emailing help@scea.wa.edu.au

Write down what you are not happy about and how it makes you feel. This will help you know what to say to Chaplain Kate

Be calm and polite when you make a complaint. Ask questions if you like such as:

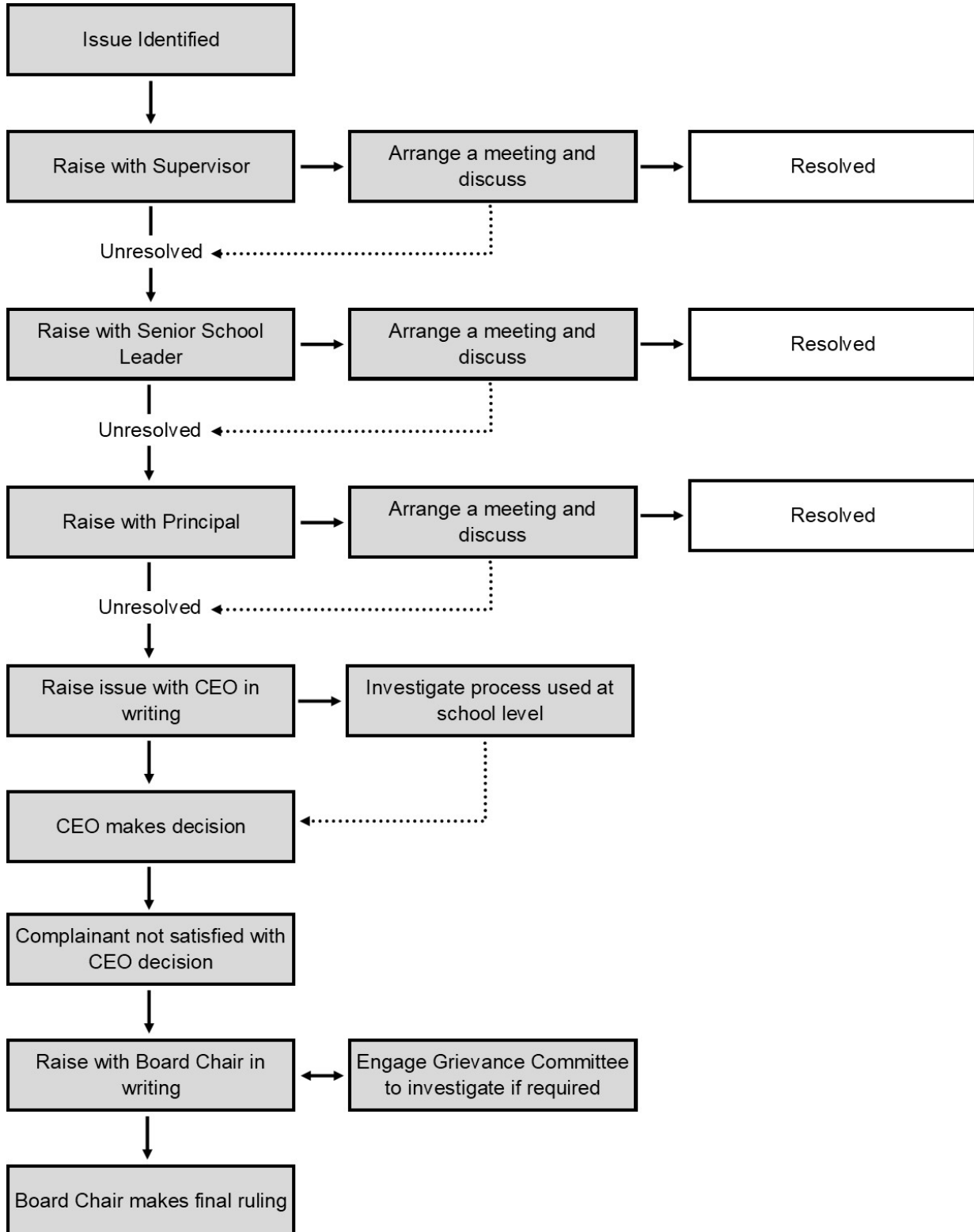
Can you keep it quiet? What happens next?

When will you get back to me?

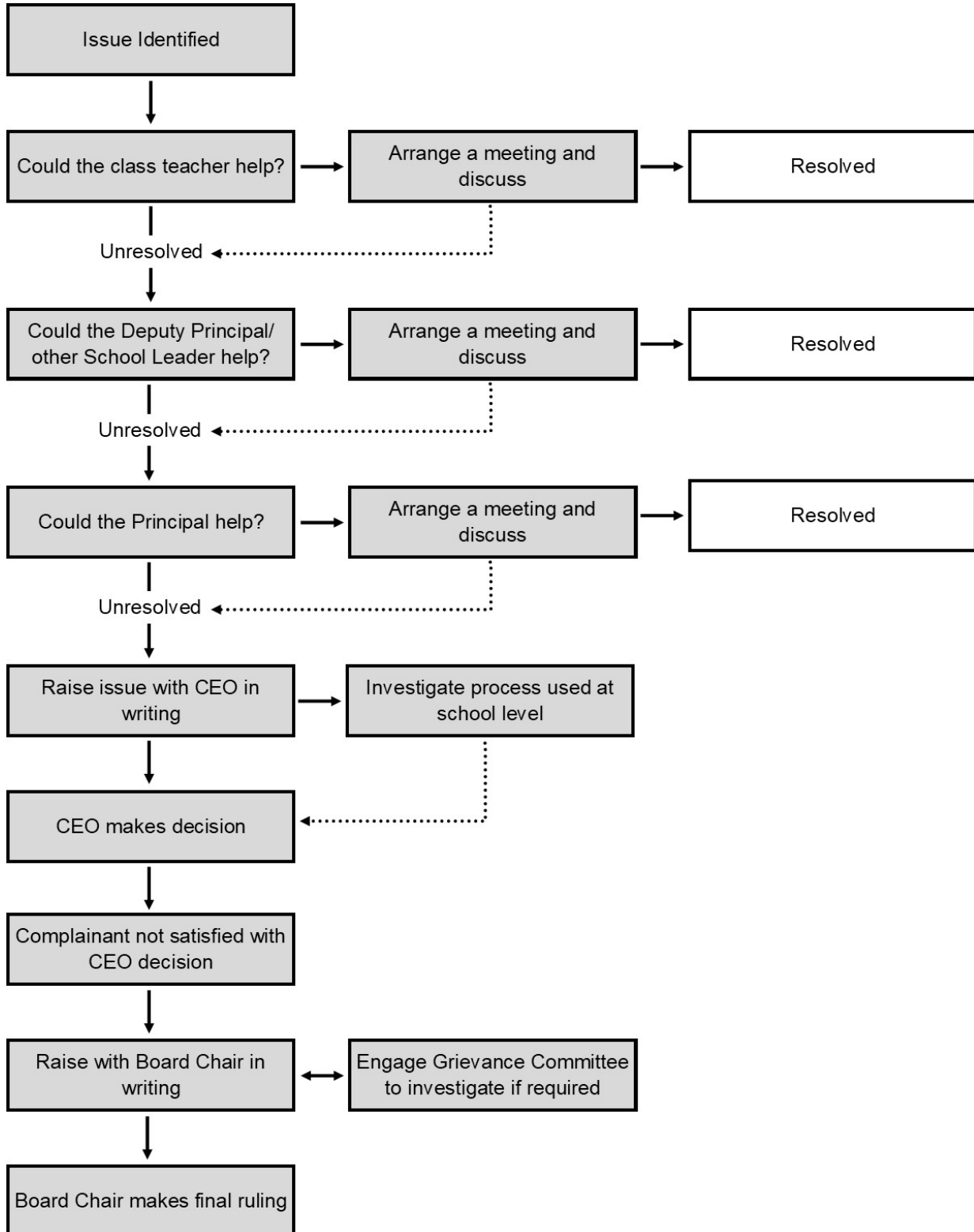
Write down who you talk to, the date and what they say they'll do. Write down how you feel about what they said. This will help you keep track of it all.

If you're not happy with what happens, you can talk to Mr Valence or Mr Pitman or anyone else who you trust - keep trying, especially if you don't feel safe or you don't think it's fair.

Appendix 4: Flowchart for making a complaint (Employees)



Appendix 5: Flowchart for making a complaint (Parents/Association Members)



Appendix 6: Grievance Committee; Terms of Reference and Dispute Resolution Procedure

Source of Obligation: SCEA Constitution 2018

In the case of employees or Parent/Association Members cases (see Appendices 4,5), where a complainant believes that the CEO has not followed a fair and reasonable process in arriving at a decision, that person may lodge a complaint in writing to the Board asking for review of the process followed by the CEO.

If following the Board's review and communication the complainant is dissatisfied with the outcome, the Board may engage the Grievance Committee to review the processes followed by the CEO and SCEA Board. Their role will be to determine whether the processes followed by have been reasonable. The committee consists of independent people who will review the processes, but not the original decisions of the CEO and SCEA Board.

After conducting its review, the Grievance Committee may then instruct the Board to ask the CEO to revise it's process in deciding the grievance. If this occurs, the Board will make its final ruling on the grievance. If the Grievance Committee finds that the process was reasonable, they will inform the Board, and the arbitrated resolution of the CEO will stand.

Primary Purpose of the Grievance Committee

The Grievance Committee's primary purpose is to review the process used in investigating a complaint at the staff or administrative levels. It is the job of the Committee to evaluate the method used, comprehensiveness, and fairness in a thoughtful, unemotive and respectful manner without bias or prejudice. The Committee will be as impartial as possible and strive not to prejudge any individual or situation.

Primary Responsibilities of the Grievance Committee

Review of formal complaint made initially	The Committee receives initial complaint to CEO and subsequent grievance lodged with the Board
Fact finding	The Committee receives and reviews any and all documentation related to the complaint; received and generated by the complainant and responses by relevant parties, including the CEO and SCEA Board
Grievance process	<ul style="list-style-type: none"> The Committee considers the processes used by the CEO in investigating the complaint. Processes include written

	<p>documentation, interview transcripts, records of meetings, relevant policies and any third-party contributions</p> <ul style="list-style-type: none"> • The Committee considers procedures and communications in terms of <ul style="list-style-type: none"> ○ Method used ○ Comprehensiveness and thoroughness ○ Triangulation of sources: written/oral/ between complainant and investigator and from third party witnesses ○ Fairness and lack of bias ○ Objectivity ○ Respect shown to the complainant
	The Committee considers the final ruling concerning the complaint by the CEO and SCEA Board; the majority of the Committee must support the ruling of the CEO on the complaint for it to be upheld
Decision by Grievance Committee	The Committee informs the Board of their decision
Board Chair considers the decision by Committee	Board Chair considers the decision by the Grievance Committee and makes final ruling
Complainant informed of Board's ruling	<ul style="list-style-type: none"> • Ruling made; complainant informed in writing • All records of process and decision are managed and stored confidentially

Appendix 7: Child Friendly Complaints System

Source of Obligation

The Western Australian Registration Standards for Non-government Schools (Standard 9.1) requires that SHCC has a child-friendly, complaints handling policy and procedures.

In addition, the SCEA Complaints Management Policy requires that each school

- Develop, as a priority, a *Child-Friendly Complaints System*, including procedures and practices that suit their specific school site, and are accessible by children and young people, and
- Review their *Child-Friendly Complaints System* periodically

Six key elements of a child-friendly complaints system have been identified as follows:

One: Focus on children and young people

At Southern Hills we ensure children and young people in our care are acknowledged as the key users of the education services provided, in our policies and procedures. We care about the children in our care.

Two: Visibility

Publicising complaints systems need to include strategies that are effective in communicating with young people and children such as SMS, email, telephone.

At Southern Hills we invite children and young people in our care to make comments. Signs on door of Mr Vallance, Dean of Students, and Chaplain Kate, clearly state “*Come and talk to us anytime*”.

We ensure that the children and young people in our care know they have a right to complain. We have created a booklet entitled “*Child Friendly Complaints Procedure*” (see p.27) that is bright and appealing and is written for children and young people.

We make sure all children are aware of it;

- they work through it during their Pastoral Care class at least once a year.
- They know where to obtain a copy at any time while at school.
- They can work through it with the Chaplain and during other one-on-one sessions with teachers at any time.

This booklet is also available on our website so that parents can access it and work through it with their child if they wish.

In addition, we have created and hang posters (see Appendix 3, this policy) which are aligned to the booklet, in clearly visible places around the school.

As well, children and young people are informed about our Complaints procedure in newsletters and at assemblies, and in emails from the principal and other staff in the leadership team.

Three: Accessibility

Make sure children and young people know who they can make a complaint to, and how. This is included in the booklet in clear, step by step procedures that can be followed by all children

and young people. The language used is age-appropriate, large font size and graphics and layout that make children want to engage with it.

Children and young people know they can take an advocate with them for support when they make a complaint. They also know that they can do it on their own if they want to.

Our students can choose how they want to complain

- In person (they have names and photos of the most appropriate person for their year group, and can also speak with our chaplain or Dean of Students regardless of what year they are in)
- In writing using a form provided and placed in a box in the Student Services Office

Southern Hills gives all students frequent opportunities to have a voice and provide feedback concerning the activities of the college.

Four: Responsiveness

Staff should be trained to respond quickly once children have complained. Child safety is paramount; time can be precious in keeping children safe.

The staff that children and young people at Southern Hills can complaint to – as indicated in the booklet – are experienced in counselling, very caring, and responsive.

They check that children and young people understand the information that is provided and given and are invited to ask questions. They are told by staff they choose to speak with and in the booklet, that they can choose how they would like to be informed of progress regarding the investigation of the complaint.

Staff handling complaints know that they must promptly acknowledge a student's complaint if it is verbal or given in writing. Timelines are quickly established and communicated to students to assure them that they have been heard and taken seriously.

Students who complain are treated with kindness, respect, understanding and helpfulness. Our staff dealing with complaints investigate and check information provided by students and clarify this as necessary. They give students the choice of how they want to be kept informed of the process.

In general, it is only the more serious complaints that require formal acknowledgment, investigation and responses.

While the complaint is being acknowledged, the staff member involved may provide a document to the complainant that describes the nature of the complaint and an overview of how the school will handle it. This helps the complainant to have clear expectations of what will be done and any outcomes.

Five: Confidentiality

Children and young people often don't make complaints due to concerns about this. This becomes complex when children and young people are involved.

Staff at Southern Hills cannot agree to a student's demands for confidentiality or requests that parents, police or other agencies not be informed when the welfare or safety of the student or

other students may be threatened. Our staff clearly explain this to students at appropriate times throughout the complaints process.

If students wish to remain anonymous, they are informed in the booklet how to do this using an email or phone call to our Whistleblower.

Six: Accountability and continuous improvement

It is important that the specific needs of children and young people are recognised in accountability and continuous improvement processes.

At Southern Hills we make sure that appropriate data is kept enabling reporting of complaints of children and young people. Records are taken during interviews of the complainant's lodgement of the complaint, witness accounts and statements, and a record of the outcome of the investigation.

Review and Continuous Improvement

Southern Hills Christian College reviews our *Child-Friendly Complaints System* periodically in order to ensure we are satisfied that our procedure is the best it can be.

We ask students who have made complaints to provide feedback about the steps involved, how they were treated, whether they were happy with the outcome etc. Students are encouraged, in the booklet, to "Keep at it" and keep trying if they continue to be unhappy with something that is happening to them; not to give up.

To review our Child-Friendly Complaints System we annually use pages 9 &10 of the Commission for Children and Young People Complaints Guidelines retrieved from;

<https://www.cyp.wa.gov.au/media/1414/report-are-you-listening-guidelines-for-making-complaints-systems-accessible-and-responsive-to-children-and-young-people-june-2013.pdf>

To inform this review Southern Hills uses feedback obtained from a range of sources including our annual Student Survey results and those gathered from students concerning the application of our Child Friendly Complaints System in their school.

Child Friendly Complaints Procedure



SOUTHERN HILLS
Christian College

PAGE

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2.What should I do before I make a complaint?	3
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1. What is a complaint?

At school you have the right to feel safe and secure and to tell someone how you feel, including if you are unhappy or have a concern about your care.

If you are not happy with something that happened, or is happening, at school, you have a right to complain about it. This means explaining and describing something that happened to you that you didn't like.



2. What should I do before I make a complaint?

You might talk to someone else about it first - to another student or friend or to a teacher or adult at the school - someone you trust.

Making a complaint can be scary, so you could ask them to come with you when you make the complaint if you like.

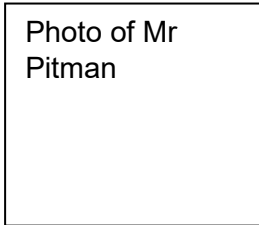
3. How can I make a complaint?

- You can talk to someone (see the next page),
or
- You can email someone, or
- You can go to the Student Services Office and ask Mrs Hasluck to help you, or
- You can phone **0487 548 758** or send an email to help@scea.wa.edu.au if you want to be anonymous (don't want anyone to know it is you that is complaining)
- You can fill in the form at the end of this booklet and put it in the box in the Student Services Office

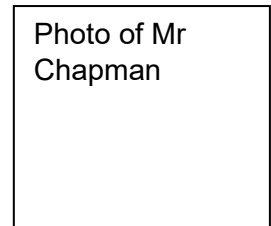


4. Who should I complain to?

If you are in Year 1 or 2, talk to [Mrs Enright](#)



If you are in years 3,4,5 or 6, talk to [Mr Pitman](#).



If you are in years 7-9, talk to [Mr Chapman](#)



If you are in year 10 - 12, talk to [Mr Mills](#)

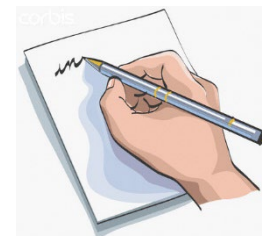
If you don't want to talk to Mrs Enright or Mr Pitman, you can go and see [Chaplain Kate](#) or [Mr Vallance](#).



5. Steps in making a complaint

Step 1. Plan what you want to say

- a. Write down what you are not happy with
- b. or what happened that you didn't like and when it happened
- c. Write how it made/makes you feel



Step 2. What would you like to happen?

What would make you happy?

Step 3. Go and see the person you want to talk to or make a time to talk to them later

Step 4. Be calm

Try not to get upset or cry because they won't clearly hear what you are saying

Step 5. Ask questions

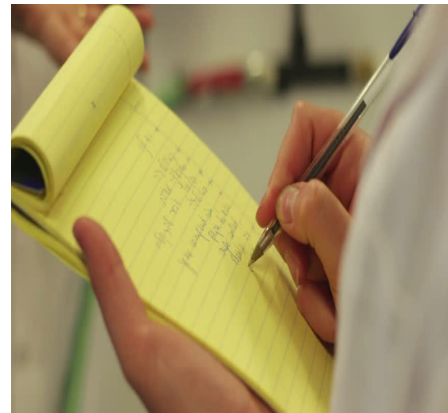
- Such as:
- What will happen next?
 - When will you get back to me?
 - Will you tell my Mum and Dad?
 - Can you talk to my Teacher/Mum please?



6. Keep notes

Write down

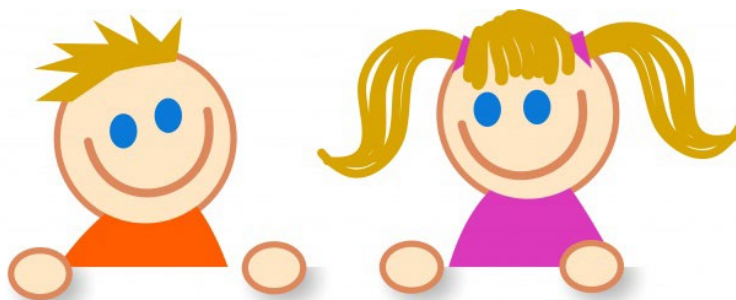
- who you talked to
- the date and time
- what they promised they'd do
- When they said they'd get back to you
- how you feel about what they said
- anything else you remember



This will help you to know that they listened to you and are doing what they said they'd do.

7. Keep at it

If you're not happy with what happens next (or if nothing happens), you can talk to another person like Mr Vallance or Mr Beacham.



We care about what happens to you.

Complaint Form for Children and Young People

(If you need help to fill in this form, see Mrs Hasluck)



1. Tell us about you

First Name _____ Last Name _____

Class _____

Teacher _____

Mobile phone _____

Email _____

2. Tell us about your complaint

Who or what are you unhappy with? _____

When did it happen? _____



3. What would make you happy?

Tell us what you would like to happen _____

Put this form in the box marked 'Student Complaints' inside the Student Services Office