COMPLAINTS POLICY

BRISBANE GIRLS GRAMMAR SCHOOL

1 Purpose

The purpose of this Complaints Policy (the **Policy**) is to ensure that complaints received by Brisbane Girls Grammar School (the **School**) from students, parents and staff of the School, as well as the wider community, are handled in a responsive, efficient, effective and fair manner.

2 Scope

This Policy applies to all:

(a) students

(b) parents (including legal guardians)

(c) staff (including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at the School) (**Staff**), and

(d) other persons who make a complaint under this Policy.

3 Policy

The School promotes a safe, inclusive and culturally responsive environment for all students, ensuring their safety and wellbeing are prioritised.

The School is committed to students exercising their right to speak up and participate in school processes and decisions that affect them.

The School views complaints as part of an important feedback and accountability process, and is committed to providing a safe, fair and honest environment where complaints and grievances are dealt with promptly, sensitively and appropriately.

The School is committed to raising awareness of the process for resolving complaints at the School and ensuring Staff are appropriately trained in line with this Policy and the Complaints Handling Procedures contained in Appendix A (**Procedures**).

The School acknowledges the rights of students, parents and Staff to raise concerns, and encourages a healthy culture where constructive criticism and complaints are resolved with as little formality and disruption as possible.

3.1 Complaints that may be resolved under this Policy

Subject to Section 3.2, complaints may be made under this Policy in relation to any matters which impact the School, its Staff, students or the School community including:

(a) the School, its Staff or students having acted improperly, unfairly or impolitely

(b) the School, its Staff or students having failed to do something they should have done

(c) issues of student or Staff behaviour that are contrary to their relevant Code of Conduct

(d) issues related to learning programs, assessment and reporting of student learning (other than academic misconduct)

(e) issues related to communication with students or parents, or between Staff

(f) issues which may affect the reputation of the School

(g) issues related to School fees and payments

(h) general administrative issues, and

(i) any matters relating to health and safety.

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

3.2 Matters outside this Policy

This Policy does not apply to complaints or conduct covered by a specific complaints process under another School policy or industrial instrument, or to other matters specified in this clause. These include:

(a) child protection concerns or risks of harm to children will be dealt with in accordance with the School's *Child Protection Policy*

(b) allegations that may constitute reportable conduct involving a worker, as defined under the Child Safe Organisations Act 2024 (QLD), will be dealt with in accordance with the School's Child Protection Policy and Risk Management Strategy and the School's obligations under the Reportable Conduct Scheme, including notification to the Queensland Family and Child Commission

(c) student bullying complaints will be dealt with in accordance with the School's *Promoting Positive Relationships Policy*

(d) Staff complaints related to workplace bullying will be dealt with in accordance with the School's *Workplace Anti-Bullying Policy*

(e) Staff complaints related to sexual harassment will be dealt with in accordance with the School's *Sexual Harassment Policy*

(f) complaints of academic misconduct will be dealt with in accordance with the School's *Academic Assessment Guidelines*, and

(g) student discipline matters, including matters involving suspension or expulsion, will be dealt with in consultation with the Principal (or authorised delegate as appropriate)

(h) Staff complaints related to their employment will be dealt with in accordance with the School's *Employee Grievance Resolution Policy*

(i) matters requiring anonymity, or highly sensitive matters, will be dealt with in accordance with the School's *Whistleblower Policy*

(j) student or Staff violence or criminal matters will be directed to the Principal, who will involve the police as appropriate, and

(k) formal legal proceedings.

If required, the School can help complainants to determine how their complaint should be made. Any such enquiries should be directed to a member of the School's Senior Leadership Team.

Nothing in this Policy prevents a person from taking other lawful action in connection with a complaint, such as seeking advice or making a claim or report to an external party. However, where appropriate, the School encourages parties to make a complaint under this Policy before taking other action.

4 Roles and responsibilities

4.1 The Principal (or authorised delegate)

The Principal (or authorised delegate) is responsible for:

(a) developing, implementing, promoting this Policy and acting in accordance with it, including ensuring Staff are appropriately trained on the processes under this Policy

(b) appropriately communicating this Policy to students, parents and Staff and ensuring it is readily accessible on the School's Learning Management System (Minerva), as well as being published on the School's website

(c) ensuring all complaints are managed in accordance with this Policy

(d) ensuring appropriate support is provided to all parties to a complaint

(e) taking appropriate action to prevent victimisation or action in reprisal against any party to a complaint, or any person associated with them

(f) appropriately implementing resolutions

(g) maintaining a Complaints Register and all relevant information relating to complaints including, but not limited to, correspondence and actions taken / complaint resolution

(h) reporting to the School's insurer and external authorities when relevant, and

(i) reporting to the School's Board of Trustees immediately upon any claim for legal address, or other matters under this Policy as appropriate.

4.2 Staff

All members of Staff are responsible for:

(a) acting in accordance with this Policy and associated Procedures when receiving complaints (where applicable),

(b) informing the party lodging the complaint of how complaints can be lodged, when they should be lodged, and what information is required

(c) providing the complainant with information about any support or assistance available to assist them in lodging their complaint

(d) ensuring the complainant has access to a copy of this Policy

(e) maintaining confidentiality in accordance with this Policy

(f) keeping appropriate records in accordance with this Policy

(g) forwarding complaints to more senior employees, including the Principal, as appropriate,

identifying and escalating matters that may involve child safety concerns or reportable conduct by a worker, in accordance with the School's Child Protection Policy and Risk Management Strategy; and

(h) not victimising or acting in reprisal against the complainant, the respondent or any person associated with them.

4.3 Parties to a complaint

All parties to a complaint are responsible for:

(a) complying with this Policy

(b) lodging a complaint as soon as possible after an issue arises

(c) providing complete and factual information in a timely manner

(d) not providing deliberately false or misleading information

(e) not making frivolous or vexatious complaints

(f) acting in good faith

(g) acting in a non-threatening, calm and courteous manner

(h) acknowledging that a common goal is to achieve an outcome acceptable to all parties

(i) recognising that all parties have rights and responsibilities which must be balanced

(j) maintaining and respecting the privacy and confidentiality of all parties, and

(k) not victimising or acting in reprisal against any party to the complaint or any person associated with them.

5 Review and Monitoring

This Policy shall be reviewed every year or in the event of any information, incident, legislative changes or organisational practice that would demonstrate the need for a review.

Document title	Complaints Policy	**Author**	Principal
Version	096.2006.006	**Approval**	Principal
Distribution	Website, Minerva	**Date**	July 2026

Any feedback on this Policy should be directed to the Deputy Principal.

6 Definitions

Complaint is an expression of concern or dissatisfaction with a real or perceived problem.

Complainant is a person who makes a complaint under this Policy. A complaint may be made about a matter directly affecting a person, or about a matter of which the person has become aware and which is of concern to them.

Respondent is the School and/or a person against whom a complaint is made under this Policy.

Reportable Conduct includes any conduct engaged in by a Staff member towards any child or young person that is reportable under the Reportable Conduct Scheme. Reportable Conduct may arise at any time from a single incident or a pattern of behaviour and may occur in person, online, or through the use of technology. Reportable Conduct categories are:

- a child sexual offence
- sexual misconduct committed in relation to, or in the presence of, a child
- ill-treatment of a child
- significant neglect of a child
- physical violence committed in relation to, or in the presence of, a child
- behaviour that causes significant emotional or psychological harm to a child.

Staff refers to employees, professional service providers, volunteers, contractors and other paid and/or unpaid education and care participants of Brisbane Girls Grammar School.

7 Related Documents

7.1 Relevant legislation

AS/NZS 10002:2014 Guidelines for complaint management

Education (Accreditation of Non-State Schools) Regulations 2017

Fair Work Act 2009

Work Health and Safety Act 2011 (Qld)

Privacy Act 1988 (Cth)

Anti-Discrimination Act 1991 (Qld)

Sex Discrimination Act 1984 (Cth)

Age Discrimination Act 2004 (Cth)

Disability Discrimination Act 1992 (Cth)

Racial Discrimination Act 1975 (Cth)

ISO 10002-2018 Complaints Handling Standard

Child Safe Organisations Act 2024 (QLD)

7.2 Relevant School policies

Appendix A: Complaints Handling Procedures

Child Safety and Wellbeing Policy

Child Protection Policy and Child Risk Management Strategy

Promoting Positive Relationships Policy

Academic Assessment Guidelines

Employee Grievance Resolution Policy

Code of Conduct

Privacy Policy and Standard Collection Notice

Whistleblower Policy

Workplace Anti-Bullying Policy

Sexual Harassment Policy

Anti-Discrimination Policy

APPENDIX A: COMPLAINTS HANDLING PROCEDURES

1 Lodging a complaint

Complaints can be lodged with the most appropriate staff member including:

(a) Junior School complaints should be lodged with the Principal, Head of Junior School, Year Level Advisor or Classroom Teacher.

(b) Senior School complaints should be lodged with the Principal, Deputy Principal, Dean of Students or Head of House.

(c) Complaints about the Head of Junior School should be lodged with the Principal.

(d) Complaints about the Principal should be lodged in writing and addressed to the Chair of the Board of Trustees.

(e) Complaints received by the Board of Trustees must be referred to the Chair of the Board of Trustees, who will handle the complaint, so far as practicable, in accordance with these Procedures.

Complaints can be lodged through various methods including phone, email and in-person (by appointment):

Chair of the Board of Trustees	(07) 3332 1300 bggschair@bggs.qld.edu.au
Principal	(07) 3332 1300 principal@bggs.qld.edu.au
Deputy Principal	(07) 3332 1300 deputyprincipal@bggs.qld.edu.au
Head of Junior School	(07) 2100 7100 headofjuniorschool@bggs.qld.edu.au
Dean of Students	(07) 3332 1330 deanofstudents@bggs.qld.edu.au
Head of House	(07) 3332 1330 studentreception@bggs.qld.edu.au

2 Anonymous complaints

If an anonymous complaint is made to the School, complainants will be encouraged to identify themselves in order for the Procedures to be implemented fully. If they choose to remain anonymous, then it is at the School's sole and absolute discretion whether any action will be taken in response to the complaint.

Should any matters require anonymity or be highly sensitive in nature, reference may also be made to the School's *Whistleblower Policy*.

3 Confidentiality

The School is committed to the confidentiality of complaints, at all steps in the process of their resolution.

Complainants, respondents and other parties (such as recipients of the complaint and witnesses) must maintain strict confidentiality during the complaints process. This means that parties must not discuss any details of a complaint or the progress of its resolution with any person who is not directly involved in the complaints process.

There are some exceptions to this. For example, parties to a complaint may discuss the complaint with a support person, professional advisor, close family member or with a counsellor who is assisting them.

Further, there may be some circumstances where it is not possible for the School to maintain strict confidentiality. The disclosure of information about the complaint may be necessary:

(a) to ensure that complaints are able to be handled in a procedurally fair way

(b) to properly investigate the complaint

(c) to comply with the School's legal obligations to notify or report certain information to external authorities or other third parties

(d) for the School to seek professional advice (including from its lawyers, insurers and auditors)

(e) to protect members of the School community (such as where the complaint involves criminal activity or reveals a possible risk to health and safety).

4 Acknowledgment and handling of complaints

The staff member receiving the complaint will offer support to the complainant. If a student is the

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.

The staff member receiving the complaint will acknowledge the complaint and outline the next steps.

When assessing a complaint, the staff member must consider whether the complaint raises a potential reportable conduct allegation involving a worker. Where this threshold may be met, the matter must be immediately escalated and managed under the School's Child Protection Policy and Risk Management Strategy, including consideration of notification obligations to the Queensland Family and Child Commission.

5 Informal complaints

The School acknowledges that concerns and issues exist that may be resolved informally without the need to follow a formal complaints process.

In such cases, complainants are encouraged to initially raise issues or concerns informally with the relevant person at the time of the issue arising. Discussing the issue or concern immediately and face-to-face may clarify the situation and resolve any misunderstandings satisfactorily.

In the event that this does not resolve the issue, or should the complainant not wish to try to resolve the complaint informally, the formal complaints process set out in these Complaints Handling Procedures (Procedures) should be followed.

6 Formal complaints

If the complainant is uncomfortable directing the complaint to the most appropriate member of staff, or wants to make a formal complaint, they can submit a complaint in writing.

This Procedure details how the School will address/capture a formal complaint.

There may be cases where, due to the sensitivity or complexity of the issues raised by the complainant, the procedure is not appropriate, and other actions may be taken.

The School will determine on a case–by-case basis the most appropriate method of handling the complaint.

7 Making a formal complaint

Formal complaints should be made in writing and include:

(a) The complainant's name and contact details

(b) The nature and circumstances of the complaint

(c) Any correspondence or documents directly relevant to the complainant

(d) Any steps that have already been taken to address the complaint, and

(e) The outcome the complainant is seeking to resolve the complaint.

The complainant should also clearly state that they are raising a complaint under the Policy.

Any Staff members (or members of the Board of Trustees) receiving a complaint verbally should encourage the complainant to make a formal complaint in writing in accordance with these Procedures. They should also notify the most relevant member of the Senior Leadership Team about the discussion so that the complaint can be received appropriately when it does arrive.

There is an underlying assumption that complaints are made in good faith and with an intention for resolution as opposed to retribution. If a complaint is made in good faith, complainants will be protected from detrimental action including victimisation and unfair treatment.

8 Acknowledging and handling a formal complaint

On receipt, the School will acknowledge the complaint (where possible, within 24 to 48 hours).

The School is committed to providing procedural fairness to the parties at each stage of the complaints process.

The requirements of procedural fairness will differ in each case depending on the circumstances of the complaint and the stage of the complaints process that is engaged.

However, the School will use its best endeavours to ensure that the complaints process is conducted in such a manner that:

(a) parties to a complaint have an opportunity to present their views and be heard

(b) parties to a complaint have an opportunity to respond to any allegations

(c) complaints are assessed by the School in an objective and unbiased manner

(d) parties can have a support person at any stage of the complaints process (being a person who is not themselves directly involved in the complaint)

(e) any decisions made by the School in relation to a complaint are made objectively having regard to relevant information, and

(f) parties to a complaint are made aware of the Policy (including these Procedures).

The School may appoint an internal or external party to investigate a complaint.

The School may seek additional information from a complainant, respondent or third party at any stage during the complaints process, if required.

All parties to a formal complaint will be appropriately supported (including counselling for Staff and students) and provided with reasonable updates on the progress of the process (where appropriate).

The School may in its sole and absolute discretion decide at any time that a complaint is, on the evidence available, vexatious, frivolous, misconceived or without substance, or that the Policy (including these Procedures) do not apply. If so, the complaint will no longer progress under the Policy and these Procedures. This will be communicated in writing to all parties to the complaint.

9 Withdrawal of complaint

A complainant may at any time withdraw their complaint. Where a complaint is withdrawn, or the complainant is not actively participating in the complaints process, the School may in its sole and absolute discretion decide to either continue to deal with the complaint, or to take no further action.

10 Timing

The School will endeavour to resolve all complaints as quickly as reasonably possible. However, the timeframe for resolution of a complaint will depend on a range of factors including the nature, scope and complexity of the complaint.

If a complaint is in respect of any changes proposed by the School, the School is not prevented from implementing those changes while the complaint is being dealt with by the School.

11 Outcomes

The School may resolve complaints in any way it considers appropriate in the circumstances, having regard to the Policy (including these Procedures), and any other relevant policies or procedures of the School.

The outcome of a complaint will vary on a case-by-case basis depending on the circumstances surrounding the grievance.

However, outcomes could include:

(a) the complainant being provided with an explanation or further information about a complaint and as a result no longer feeling aggrieved

(b) the complainant receiving an apology or statement of regret where appropriate

(c) disciplinary action being taken against the respondent, where appropriate

(d) a review of policies, procedures or practices, or further training of Staff, if required

(e) mediation services, counselling or other support as appropriate, and/or

(f) where the complaint concerns the actions of students, the involvement of the School's Student Care team may be recommended.

The School will inform the complainant and respondent of the outcome of the complaint.

However, in some cases, it may not be appropriate for the School to disclose details of the specific action taken in relation to a complaint. For example, where the School takes disciplinary action against a student or Staff member, or resolution of the complaint otherwise gives rise to issues of confidentiality or privacy.

Complainants, respondents and people associated with them will not be victimised because of lodging a complaint, nor will they suffer any other reprisals.

The School will manage any conflicts of interest that may arise during the course of investigation of any complaint.

Nothing in the Policy (including these Procedures) prevents the School from taking action to investigate or address matters of which it is aware, but which have not been raised as complaints made under the Policy.

12 Review process

If a party to a complaint is unsatisfied with the outcome of any investigation, they may refer the matter to the Principal for review.

If a party to a complaint remains unsatisfied with the outcome after the Principal's review, they may refer the matter to the School's Board of Trustees for review.

Any review will be managed as deemed appropriate by the Principal or the Board of Trustees (as the case may be) in the circumstances.

For complaints against the Principal, the outcome of the Board of Trustees' initial investigation into the complaint will be final.

13 Recordkeeping and reporting

The School maintains a Complaints Register where all formal complaints are recorded, classified and analysed to identify systemic, recurring and single incident problems. Any trends are noted to identify key risk areas and help eliminate the underlying causes of complaints.

Confidential records are kept including details of the description of a formal complaint, supporting documents if any, immediate action taken, records relating to any investigation undertaken including witness statements if applicable, and a log of all interactions during the complaints process.

The Board of Trustees will receive regular reports (as appropriate) with respect to the status of existing complaints, any underlying statistical trends, and any relevant information with respect to resolutions that have been implemented.

The School's *Privacy Policy* and *Standard Collection Notice* provides for how the School manages personal information covered by the *Privacy Act 1988* (Cth).