

# Complaints Handling Policy



BRISBANE GIRLS GRAMMAR SCHOOL

## 1 Purpose

The purpose of this Complaints Handling Policy (**the Policy**) is to:

- (a) establish a framework for the handling of complaints that relate to the operation of Brisbane Girls Grammar School (the School);
- (b) endeavour to increase the level of satisfaction and improve the relationship between the School, parents and wider community;
- (c) recognise, promote and protect the right to comment and complain;
- (d) provide an efficient, fair and accessible mechanism for resolving complaints in accordance with the principles of natural justice;
- (e) ensure that the complaint handling process is transparent and comprehensive.

## 2 Scope

This Policy applies to all staff receiving or managing complaints from parents, other staff members, students or the wider community.

Employee grievances should be managed through the School's Employee Grievance Policy.

## 3 Policy statement

The School is committed to providing a safe, fair and honest environment where complaints and grievances are dealt with promptly and sensitively. Parents, guardians, staff, students and the wider community are encouraged to come forward with their concerns and grievances in the knowledge that the School will hear their complaints, and that action will be taken in the manner that the School deems as appropriate and lawful.

All members of staff are responsible for receiving complaints, treating them as a serious matter and dealing with them politely, appropriately and in a timely manner. Wherever possible, complaints should be resolved by a process of discussion and cooperation. The aim is to reach an acceptable outcome that minimises any potential detriment to ongoing relationships.

If a complaint or allegation is about a person's behaviour and concerns the protection of children and young people or any other behaviour which, if substantiated, could amount to an internal investigation (and possibly a crime), the Principal is to be notified immediately. Refer to the School's Child Protection Policy.

Details on procedures regarding the *Complaints Handling Policy* can be found in **Appendix A**.

## 4 Roles and responsibilities

### 4.1 The Principal (or authorised delegate)

The Principal (or authorised delegate) is responsible for:

- (a) ensuring the *Complaints Handling Policy* is implemented and communicated to staff, parents, students and the wider community;
- (b) ensuring complaints handling procedures are adhered to by staff;

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SPONSOR: Principal  
 AUTHOR: Director of C&E

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- (c) ensuring all complaints are acknowledged within 24 – 48 hours;
- (d) ensuring any complaints regarding the protection of children are addressed immediately in accordance with the School's *Child Protection Policy*;
- (e) initiating and authorising investigations, if necessary;
- (f) investigating complaints.

#### 4.2 Deputy Principal

The Deputy Principal is responsible for ensuring:

- (a) the *Complaints Handling Policy* and Procedures are being followed by staff;
- (b) all complaints or allegations regarding a person's behaviour which may impact the wellbeing and safety of students are reported to the Principal;
- (c) the complainant is fully informed of progress to the resolution of the complaint;
- (d) complaints register is maintained.

#### 4.3 Director of Communications and Engagement (C&E)

The Director of C&E is responsible for ensuring community sentiment regarding the School and school activities is monitored, and concerns/issues are addressed in order to prevent formal complaints.

### 5 Review and monitoring

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

### 6 Definitions

**Complaint:** an expression of dissatisfaction made to the School, related to any matter regarding the School's operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

**Complainant:** any person who has a complaint. A complainant may include any member of staff, parent, student or member of the community.

**Complaints Handling Policy:** the policy set out in this document.

**Complaint Procedure:** the procedures set out in this document.

**Natural Justice:** Natural Justice involves:

- (a) acknowledging and respecting that complainants are entitled to raise a complaint/s in good faith
- (b) complaints handling procedures being accessible, promoted within the School, and applied consistently and fairly to all those to whom these procedures apply
- (c) both complainant and respondent having the capacity to seek advice, have a support person and/or be represented throughout the process

- (d) sufficient particulars of the allegation/s made or relevant information relied upon to support the allegations being provided to enable the respondent to respond
- (e) both complainant/respondent being given a reasonable time to prepare and submit: the complaint (complainant); a response to allegations made (respondent); or information provided (both complainant and respondent)
- (f) genuine consideration being given to all information (including the respondent's response) prior to any decision being made.

**Particulars:** the particulars of an allegation must provide enough detail to enable the respondent to provide a response. Details such as who, what, when, where and how must be provided to ensure delivery of natural justice. Relevant particulars of the allegation/s or information relied on to support the allegation should be provided to the respondent in writing.

**Procedural fairness:** procedural fairness is concerned with the procedures used during an investigation and/or by a decision-maker, rather than the actual outcome. It requires a fair and proper procedure to be used when conducting an investigation and/or making a decision. A process that delivers procedural fairness requires a demonstration of transparency, equity in examination of evidence, and freedom from bias, perceived or otherwise, in the decision-making process.

**Policy and Procedures document:** this *Complaints Handling Policy* and Procedures document.

**Respondent:** any person against whom a complaint is brought.

## 7 Related documents

Child Protection Policy

Child Risk Management Strategy

Employee Grievance Policy

Code of Conduct

Privacy Policy

ISO 10002-2014 Complaints Handling Standard



## 1 Principles

The following principles inform the content of this policy:

### 1.1 Commitment

The School will investigate all complaints in accordance with this Policy. This will be reflected in the:

- (a) adoption and distribution of the *Complaints Handling Policy* and Procedures
- (b) appropriate training of staff in the implementation of this Policy
- (c) ongoing monitoring and evaluation of effectiveness of the *Complaints Handling Policy* and Procedures.

### 1.2 Responsiveness

Complaints will be acknowledged within 24-48 hours. The process and the time needed to resolve an issue will vary depending on the nature and complexity of the issue.

### 1.3 Visibility

The existence of the *Complaint Handling Policy* and Procedures, its purpose and the method of accessing it will be promoted internally for staff and externally to the community via the School's website.

### 1.4 Procedural fairness

The principles of procedural fairness will be followed in all aspects of complaint handling. Procedural fairness includes:

- (a) giving the complainant and respondent the opportunity to share their perspective on the issue
- (b) offering reasonable assistance to the complainant to enable the complaint to be made, and to ensure the complainant and respondent are aware of the complaint handling procedures

## Appendix A: Procedures

- (c) informing the respondent of the substance of the complaint and providing an opportunity to respond
- (d) providing the respondent with information about the complaint investigation process including outcomes
- (e) handling the complaint process confidentially in compliance with the *Information Privacy Act 2009 (Qld)*
- (f) determining complaints as expeditiously as possible and advising the complainant and the respondent of the outcome of the investigation
- (g) assessing the facts and circumstances of the situation objectively and determining the complaint fairly and equitably
- (h) providing all parties with details of the determination and reasons for the decision
- (i) informing the complainant and the respondent of any avenue for review.

### 1.5 Confidentiality and Privacy

Confidentiality is an obligation to the provider of information while privacy is an obligation to the subject of the information. Privacy will be in line with the principles outlined in the School's Privacy Policy. In making a complaint a complainant can feel secure that their complaint will remain confidential. Confidentiality will be respected at all times within the constraints of the need to fully investigate the complaint. The obligation to maintain confidentiality extends both to the complainant and to the respondent.

### 1.6 Access and equity

The *Complaints Handling Policy* needs to be accessible and assistance may be available to complainants who require additional support (e.g. if from a culturally diverse background, have a disability or are a minor).

### 1.7 No victimisation

If a complainant makes a complaint in good faith, they will be protected from detrimental action including victimisation or unfair treatment.

### 1.8 Vexatious or malicious complaints

There is an underlying assumption that complaints are made in good faith (and with good will) and with an intention for resolution as opposed to retribution.

### 1.9 Anonymous complaints

Anonymous complaints do not reflect the principles outlined above. If an anonymous verbal complaint is made to the School, complainants will be encouraged to identify themselves in order for the procedures outlined in this Policy to be implemented fully. If they choose to remain anonymous, then in the case of verbal complaints, they will be informed that the complaint may not be pursued further and in any case, the complainant will not be able to be kept informed of any progress on the matter.

Please note: complaints relating to Child Protection matters (not covered by the *Complaints Handling Policy* and Procedures) may be managed differently.

## 2 Informal complaints resolution

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, the Formal Complaints Process should be followed.

## 3 Formal Complaints Process

The following procedures are a guide explaining how the School will address/capture a complaint.

There may be cases where the procedure is not appropriate and other actions will be taken. The School will determine on a case-by-case basis the most appropriate method of handling the complaint.

### 3.1 Making the complaint

The School has determined that any issue raised in writing (by email or letter) that is an expression of dissatisfaction, should be considered a complaint and managed in accordance with complaints handling procedures.

Complaints can be addressed to the Executive as follows:

- (a) The Principal
- (b) The Deputy Principal
- (c) The Deputy Principal (Students)
- (d) The Deputy Principal (Academic)
- (e) Director of C&E

If a complainant is in any doubt of the best person to contact, the complaint should be addressed to the Principal.

Any staff members receiving a complaint verbally should encourage the complainant to present them to the School in writing. They should also notify the most relevant Executive listed above about the discussion so that the matter can be received appropriately when it does arrive.

Should a complaint be made against the Principal, this complaint should be put in writing and addressed to the Chair of the Board of Trustees. Complaints received by the Board of Trustees must be referred to the Chair, who will discuss the matter/s with the Principal.

### 3.2 Acknowledging and handling the complaint

On receipt, The Principal, Deputy Principal, Deputy Principal (Students), Deputy Principal (Academic) or Director of C&E will acknowledge the complaint and advise an approximate timeframe to investigate the matter.

They should also:

- (a) carefully listen to the complainant's concerns and their desired outcomes
- (b) request further information from the complainant and/or from third parties if required
- (c) keep appropriate, confidential records of the matter
- (d) refer the complaint to a more senior staff member or the Principal where appropriate
- (e) keep all parties informed in regards to the progress of the complaint.

The School keeps a Complaints Register.

### 3.3 Outcomes

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 understanding the situation and no longer feeling aggravated or upset
- (b) the complainant receiving a written response, and where appropriate an apology
- (c) where appropriate, the respondent receiving disciplinary action where a School Policy or *Code of Conduct* has been breached
- (d) where the complaint is regarding the actions of another parent, if appropriate a mediation process may be initiated by the School in an attempt to address the concerns, acknowledging that the School cannot enforce an outcome
- (e) where the complaint is regarding the actions of students, the involvement of the School Counsellors may be recommended.

## 4 Record keeping

### 4.1 Record keeping

Records should be kept of every complaint, including details of the description of the complaint, supporting documents if any, immediate action taken, records relating to the investigation, including witness statements if any, etc.

### 4.2 Complaints Register

All complaints should be recorded on the Complaints Register, classified and analysed to identify systemic, recurring and single incident problems. Any trends should be noted to identify key risk areas and help eliminate the underlying causes of complaints through corrective actions.

### 4.3 Management reporting

The Board of Trustees and Executive should receive regular reports (as appropriate) with respect to the status of existing complaints, any underlying statistical trends, as well as information with respect to corrective actions that have been implemented.