

## COMPLAINTS MANAGEMENT PROCEDURES – SAAC

### 1. PURPOSE

The purpose of these procedures is to detail the local operating procedures that must be followed when a complaint is received at St Andrew's Anglican College (the College)

### 2. REFERENCES

These local operating procedures are consistent with the staged approach described in the Complaints Management in Anglican Education Guidelines and Procedures:

- Stage One      Seek resolution with the staff member whose conduct is in question
- Stage Two      Complain to the appropriate Supervisor/Manager
- Stage Three     Complain to the Principal
- Stage Four      Complain to the College Council Chair
- Stage Five      Complain to the Executive Director – Anglican Schools Commission.

### 3. PROCEDURES

#### 3.1 Responsibilities of staff who receive a complaint

Any staff member, where it could be perceived\* that they are receiving a complaint, must take the following actions:

##### 3.1.1 Respond to the potential complainant, or their representative by:

- Being respectful and courteous
- Clarifying whether the intention of the person providing feedback, or general concern, is for the matter to be handled as a complaint
- Providing initial acknowledgement of the complaint received and assistance to make a complaint if necessary.

##### 3.1.2 Escalate a complaint to a later stage if required e.g.

- At complainant's discretion
- If the complaint is related to the safety of a child or young person
- If the complaint is related to an alleged breach of law (including regulations)
- If the complaint is related to a strategic risk to the College
- If the complaint relates to a Licensed Clergy or lay person.

##### 3.1.3 Follow other relevant requirements related to the information provided, such as applying the Protecting Children and Young People in Anglican Education Policy

##### 3.1.4 Follow any procedures (local, or those detailed in this document), that implement this Policy into practice.

*\*Note: If there is doubt - the matter is to be managed as a complaint and any relevant escalation to occur.*

### 3.2 Complainant's Discretion

As per the Policy, a complaint can proceed to a further stage where a complainant, or their authorised representative, determines:

- the stage is not appropriate, or
- the complaint has not been addressed to their satisfaction.

### 3.3 Complaints related to the conduct of a non- staff member

Stage one is not to be used for complaints related to the conduct of any person at the College who is not a staff member, for example, a child, volunteer or visitor.

In these circumstances, the complainant or their authorised representative is to escalate the complaint to stage two or further.

### 3.4 Complaints in relation to visitors to the College

When a complaint is about a visitor to the College, the complainant is asked to, where known, provide the name of the visitor, the organisation that the visitor works for, the names of any children involved, if relevant, and any dates and times of particular incidents related to their complaint. The person managing the complaint must:

- Consider the risk posed by the information provided in the complaint and follow other relevant requirements related to the information provided, such as following the Protecting Children and Young People in Anglican Education Policy
- Document the concerns and, unless the matter involves a criminal investigation, forward the complaint to the organisation that employs the visitor who has been named in the complaint. If the matter does relate to a criminal investigation, direction will be sought from the Police
- Consider the nature of the complaint and determine whether this may impact any future visits to the College, by the person named in the complaint
- If the matter is being managed by another member of the leadership team, as soon as practicable, this member must brief the Principal.

### 3.5 Complaints related to concerns for the safety of a child or young person

Stage one is not to be used for complaints related to concerns for the safety of a child or young person.

In these circumstances, the complainant or their authorised representative is to escalate the complaint to stage two or further.

The person receiving the complaint must consider whether the Protecting Children and Young People in Anglican Education Policy applies, and if so, this is to occur in tandem with the management of the complaint.

### 3.6 Complaints related to an alleged breach of law

In these circumstances, the complainant or their authorised representative is to escalate the complaint to stage two or further.

The person receiving the complaint must consider whether the Protecting Children and Young People in Anglican Education Policy applies; and if so, this is to occur in tandem with the management of the complaint.

### 3.7 Complaint relates to non-compliance with the Protecting Children and Young People in Anglican Education Policy

A complaint is to be made, in writing, to the Executive Director, ASC. This can occur through:

- Email to the Executive Director: [asc@anglicanchurchsq.org.au](mailto:asc@anglicanchurchsq.org.au)
- Mail to the Executive Director: GPO Box 421, Brisbane, Qld, 4001.
- Contact details can also be obtained through the Anglican Schools Commission website: <https://www.ascqld.org/>

If the complaint relates to child sexual abuse, consistent with the Protocol for Responding to Child Sexual Abuse or Sexual Misconduct, the Executive Director will report the matter to the Director of Professional Standards, ACSQ.

For other Anglican Schools, a complaint is to be made, in writing, to the Chair of the School's governing body (the Board). Local procedures include relevant contact details.

### 3.8 Where it is reasonable to identify a strategic risk

Complaints where it is reasonable to identify a strategic risk to College, are to be managed by stage 3 or further.

When being managed by Stage 3, the Principal must, as soon as practicable, brief stage 4 and 5 delegates.

### 3.9 Where the complaint relates to Licensed Clergy or lay person

- Licensed Clergy or lay person is a person holding the Archbishop's licence to any special charge or cure or to the performance of any spiritual duty or service within the Diocese.
- Complaints related to Licensed Clergy or lay person are to be managed by stage 3 or further.
- Details of the complaint are to be provided to the relevant regional Bishop by the person responsible for managing the complaint.
- When being managed by Stage 3, the Principal must, as soon as practicable, brief stage 4 and 5 delegates.

## 4. RESPONSE MANAGEMENT REQUIREMENTS

### 4.1 Complaints Register

A Complaints Register will be kept by the College. The Register is to keep a log of complaints and summarises the key information about each complaint, including, at minimum:

- Complainant/s
- Authorised representative/s (if applicable)
- Any relevant identifying numbers, e.g. enrolment or account number
- Person responsible for managing complaint

- Date complaint received
- Date complaint closed
- Location of detailed documentation.

#### 4.2 Information to collect regarding a complaint

Where possible, the following information is to be collected from a complainant or their authorised representative:

- Date complaint received
- Complainant's personal details
- Who should be contacted regarding the complaint and their preferred contact details, e.g. the complainant or their authorised representative
- Any relevant identifying number, e.g. enrolment or account number
- Any special assistance or support needed by the complainant to properly interact about the complaint
- Whether the issue has been raised previously and any response, e.g. through an earlier stage
- Details/reasons for the complaint
- Details of outcome sought.

#### 4.3 Minimal information to be recorded about handling a complaint

- Details of person responsible for managing the complaint
- Evidence of acknowledgement of receipt of the complaint
- Review to identify any need for escalation
- Review to identify any application of other relevant requirements related to the information provided, such as following the Protecting Children and Young People in Anglican Education Policy
- Assessment of complaint and associated decision as to the method for handling the complaint
- Any new relevant information obtained that influences the complaint's management
- Relevant information from the method used to handle the complaint, including, where relevant, analysis and conclusions
- Updates provided to the complainant or their authorised representative
- Outcomes of the complaint, including, where relevant, recommendations
- Other relevant actions taken
- Date complaint closed.

#### 4.4 Record Keeping

When recording information in relation to a complaint, all records must be accurate and filed in a manner that is retrievable and in keeping with any privacy and record retention requirements.

#### 4.4 Allocating a Complaint Manager

Each complaint will be allocated to an appropriate staff member to manage. This allocation is to be consistent to the staged process and any applicable exclusions or considerations.

The person managing the complaint will be responsible for the following, consulting with other relevant staff or leaders where of benefit to the effective management of the complaint:

- Deciding method for complaint handling and if so, by whom
- How quickly it will be dealt with, the priority and resources it will be given
- The appropriateness of the outcome achieved.

Persons responsible for managing complaints must:

- Be able to identify and respond to people's support and communication needs
- Treat complainants, their representatives in a respectful and courteous manner
- Follow policy, guidelines and procedures.

#### 4.5 Acknowledge complaint and advise of intended method for complaint handling.

In a timely way, meeting any legal requirements and where at all practicable within a maximum of three business days, acknowledge receipt of complaint to the complainant or their authorised representative.

- confirmation of person who is responsible for managing the complaint
- intended method for handling the complaint
- likely process to be followed, included any steps to provide an update or outcome.

### 5. **METHODS FOR HANDLING COMPLAINTS**

The complaint will be assessed by the person managing the complaint and a decision made as to the appropriate method for handling the complaint. This decision may be revisited during the response management, for example, when new information is being considered. Information, usually provided by the complainant, will be used to determine if and how the complaint can be dealt with. Issues to be considered include:

- Nature, complexity, seriousness and urgency of the matters alleged
- The complainants desired outcome
- Whether there is any utility in taking the matter further
- The adequacy of the information provided
- The options available to address the complainant's concerns
- The appropriate level at which the matters alleged can be addressed.

#### 5.1 Internal Options

- Internally facilitated resolution. Where the person managing the complaint talks with the complainant, or their authorised representative, to see if a mutually acceptable resolution can be achieved. Where appropriate, this process may include facilitating a discussion between staff and the complainant.
- Internal investigation. Investigating allegations that raise significant issues for the complainant or for the operations of the School, ECS or associated business.

- Depending on the circumstances, such investigations may be undertaken by another appropriate staff member.
- Internal review. People who receive complaints in stages 2 to 5, or a senior member of staff with whom they have delegated, may review the decisions made and make recommendations for previous decisions to be changed or other remedies applied.

## 5.2 External Options

- Externally facilitated Alternative Dispute Resolution (ADR). An independent third party, such as a professional mediator, may be engaged to help resolve an escalating dispute. The mediator, through a formal face to face process of discussion, helps the parties to clarify the issues and reach mutually acceptable solutions.
- External investigation. Investigating allegations that raise significant issues for the complainant or for the operations of the School, ECS or associated business. Depending on the circumstances, such investigations may be undertaken by an external investigator, under contact.

## 5.3 Complaint Analysis

In seeking to identify the reasons why a complaint has been made, and in seeking to prevent a problem reoccurring, problems should be analysed. To do so, the following process will be used:

- Use the information from the complaint to define the problem/s
- Identify the goal/s that have been impacted
- Collect information that is reasonably able to be obtained and relevant
- Identify possible causal factors for the problem
- Seek to identify the root causes of the problem

In seeking to identify the root cause, each possible causal factor should be analysed separately, asking why it occurred, until the root cause is identified. Recommendations for change or remedy should be focused on causes, including root causes, of problems identified.

## 6. OUTCOMES

### 6.1 Informing complainants of outcomes

When the person managing the complaint is of the view that the complaint has been addressed, inform the complainant of the outcome. If the complaint is not resolved to the complainant's satisfaction, explain the reasons for the decision and offer possible alternatives to the complainant, such as escalation to a further stage or appeal.

### 6.2 Recognition of wrongdoing

When things go wrong, many complainants want to be listened to, understood, respected and where appropriate, provided with an explanation or apology. A prompt and sincere apology may avoid an escalation of a dispute. Effective apologies describe and recognise the wrongdoing and acknowledge the impact to the complainant. Where appropriate, the complainant should be also provided with:



- An explanation of the cause or reasons for the problem, or a commitment for these causes to be further explored or investigated.
- An appropriate and sincere expression of regret (apology).
- Provision of redress, such as the action taken or intended to be taken to address the problem, mitigate the impact and/or avoid future occurrences.

### 6.3 Appeals and Other Actions

In addition to progressing through the stages of complaints, any person who has made a complaint and is dissatisfied with the complaint management or outcome, may make an appeal to the Archbishop of the Diocese of Brisbane

Complaints and appeals do not limit the complainant's ability to take actions they consider appropriate in the circumstances, such as contact with an appropriate statutory authority; contact with a legal practitioner to obtain advice; or other action required or authorised by law.

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