1. Background and Purpose

The purpose of this Policy is to provide direction and instruction on the requirements and expectations regarding the management of **complaints** related to relevant Anglican **Schools** and **Education & Care Services** (ECS).

A complaint is the expression of dissatisfaction made to or about a School or ECS, related to its service, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

2. Application

This Policy, developed by the Anglican Schools Commission (ASC) and approved by Diocesan Council, Anglican Church Southern Queensland (ACSQ) applies to all Anglican Schools and ECS in the Diocese, and any associated committee or business, such as ECS management committees, P&F committees, international colleges or sporting clubs.

Other Anglican Schools and ECS in Queensland have permission to use this Policy.

3. Policy Exclusions and Considerations

3.1 Whistleblowing

Whistleblowing is excluded from this Policy, and at times, may be an appropriate alternative to making a complaint. The Whistleblower Policy for Anglican Education applies when the ACSQ **owns** a School or is the Approved Provider for an ECS. **Other** Schools or ECS, including those **controlled** by the ACSQ, have specific legislative obligations and as such are responsible for having alternative whistleblower processes.

3.2 Application of other relevant Policies and processes

Certain complaints may trigger the application of other Policies and processes. Staff managing the complaint are responsible for this application where relevant. Examples of this include:

- Complaints related to the abuse or neglect of children and young people requires the application of the Protecting Children and Young People in Anglican Education Policy.
- Application of Record Retention Schedule.

3.3 Other actions

Complaints made under this Policy 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.

4. Policy Statement

This Policy provides a foundation for a complaints management system within each School or ECS, which is defined by guiding Principles. In doing so, this Policy seeks to enable:

a) a transparent, accessible and effective complaints process; and
b) review and analysis of complaints, and their outcomes, to deliver quality improvements.

4.1. Guiding Principles

4.1.1. Complaints enabling

At all levels there is a proactive approach to creating an operating environment that encourages the receipt of feedback and complaints; and seeks to enable complaints to be actively managed.

There is well publicised information on how and where a complaint can be made, including support available; and all reasonably practicable actions are taken for the complaints management system to be accessible, including for people who require assistance.

Complaints can be made by any person (**the complainant**), or by an authorised representative of the complainant; and complaints can be made anonymously, noting this may impact on the ability to address the content of such complaints.

4.1.2. People focussed

People's right to complain is fostered. In doing so, complainants are treated with respect, with their needs and expectations acknowledged; all reasonable steps are taken to prevent adverse effects to the complainant; and the complainant is involved in the process as far as practicable and appropriate.

All people are treated with courtesy, dignity and respect; and the needs of all people involved in the complaints process are recognised. In doing so, the conduct expectations of complainants, their representatives or support, and those responding to the complaint are communicated; and their support needs, where reasonably practicable, are met.

Where possible, people's personal information, including identity, is kept confidential and privacy maintained. Of note, information may need to be shared where allowed to by law and necessary, for example, to effectively manage the complaint, or support the safety of persons or the successful operations of the School or ECS.

4.1.3. Responsive

Complaints will be responded to within reasonable timeframes and in keeping with any legislated requirements. Complaints are assessed and priority given in accordance to the urgency of the issues raised. Complainants are advised of the complaints process; expected timeframes for actions; and their likely involvement in the process.

Where allowed by law and where reasonable, people involved in the management of the complaint/s will be kept informed of the progress and outcome of the matter. This includes the complainant, their authorised representative, those responding to or involved in the management of the complaint; or other persons identified as necessary to support the safety of persons, or the successful operation of the School or ECS.

4.1.4. Fairness

Complaints are sought to be managed in a manner than is equitable, impartial and unbiased. To do so, consideration is given to conflicting issues and actions taken to prevent interference, or the perception of interference, with the management or outcome of the complaint.

4.1.5. Risk Reduction

A risk management approach that aims to act in a preventative manner and reduce the likelihood of harm is applied. Information received is assessed and all appropriate actions taken to reduce a reasonably foreseeable danger to any persons.

4.1.6. Continuous improvement

Complaints management practices and outcomes are reviewed for their effectiveness. With a focus on continuous improvement, complaints and their outcomes are recorded in a manner that allows for analysis, evaluation and audit of the effectiveness of management practices; and an analysis and reporting framework is in place to facilitate such review.

5. Key Requirements

The following key requirements are to be met to implement this Policy.

5.1. Stages

Schools and ECS operate a staged approach to the management of complaints. In most circumstances, complainants are encouraged to progress their complaint by starting with stage one, with any exclusions that apply detailed below (5.1.2). Stage two is an optional stage for each school or ECS' local operating procedures, due to varying organisational structures.

Stage	Who complaint is provided to (the receiver)	
	Schools	**ECS**
One	Seek resolution with the staff member whose conduct is in question.	
Two	Complain to an **Appropriate Authority**	
Three	Complain to the **Principal**	Complain to the **Nominated Supervisor**
Four	Complain to the school's Council Chair	Complain to the: • Principal (co-located ECS), or • Chair of the ECS Management Committee (if present)
Five	Complain to the: • Executive Director, ASC (where a school is owned or the ACSQ, or the ACSQ is the Approved Provider of the ECS), or • Chair of the governing body (Board) (other schools or ECS)	

5.1.1. Responsibilities of those who receive complaints

Delegates for receiving complaints are responsible for:
a) Clarifying whether the intention of the person providing feedback, or general concern, is for the matter to be handled as a complaint.
b) Escalate a complaint to a later stage if required under this Policy (see 5.1.2).
c) Escalate a complaint to at least stage 3 where:
   • it is reasonable to identify a strategic risk to the School or ECS, or
   • the complaint relates to **Licensed Clergy or lay person**
d) Following other relevant requirements related to the information provided, such as following the Protecting Children and Young People in Anglican Education Policy.
e) Following Procedures that implement this Policy into practice.

5.1.2. Stage Exclusions and Considerations

a) Complainant's discretion

Where a complainant, or their authorised representative, determines the stage is not appropriate or the complaint has not been addressed to their satisfaction, then the matter can proceed to a further stage.

b) Matters where Stage One is not to be used

Stage one is not to be used when the complaint relates to any of the following circumstances:
   i.   Complaints related to the conduct of any person at the school who is not a staff member, for example, a child, volunteer or visitor
   ii. Complaints related to concerns for the safety of a child or young person
   iii. Complaints related to an alleged breach of law (including Regulations).

Note, if the complaint relates to non-compliance with the Protecting Children and Young People in Anglican Education Policy, refer to the 5.1.2 (c).

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

For Schools owned or controlled by the ACSQ, or where either the ACSQ or an owned or controlled School is the Approved Provider of the ECS, a complaint is to be made, in writing, to the Executive Director, ASC. 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 or ECS, a complaint is to be made, in writing, to the Chair of the School or ECS' governing body (the Board).

5.2 Appeals

For Schools or ECS within the **ACSQ catchment**, any person who has made a complaint in accordance with this Policy and is dissatisfied with the complaint management, may make an appeal to the Archbishop of the Diocese of Brisbane (ACSQ).

For other Queensland Anglican Schools or ECS, an appeal can be made with the respective Bishop (e.g. the Bishop for North Queensland).

5.3 Guidelines and Procedures

This Policy is operationalised in the Complaints Management in Anglican Education Guidelines and Procedures. This document is approved and maintained by the Anglican Schools Commission, and details the following mandatory requirements:

a) Guidelines that are to be met by local operating procedures within each School, ECS or associated business
b) Procedures for Stage 5, where ACSQ is the Approved Provider of the ECS
c) Procedures for Stage 5, where a School is owned or controlled by the ACSQ
d) Procedures for Appeals to the Archbishop of the Diocese of Brisbane

5.3.1 Approval of local operating procedures

Local operating procedures are to be approved by:
a) In Schools, the School Council, or in the absence of a Council, their governing body (Board)
b) In ECS, the delegate/s of their Approved Provider. For ECS, where ACSQ is the Approved Provider, this is both the Executive Director (ASC), and the Nominated Supervisor's line Manager.

5.4 Assurance

5.4.1 Quarterly Reporting

On at least a quarterly basis, Principals and Nominated Supervisors will ensure each School and ECS reports on:
a) Number of complaints, from stage 2 on, that have been received
b) The concerns associated with the complaints
c) The actions taken by the School or ECS to respond to the concerns raised, including response timeframes.

This will occur through a written report to:
a) In Schools, the School Council, or in the absence of a Council, their governing body (Board)
b) In ECS, the delegate/s of their Approved Provider. For ECS, where ACSQ is the Approved Provider, this is both the Executive Director (ASC), and the Nominated Supervisor's line Manager.

5.4.2 Annual Reporting

On an annual basis an analysis will be made by each School and each ECS, of complaints from stage 2 on, that have been managed in the preceding twelve months. At minimum, consideration will be given to:
a) Effectiveness of the management of the complaints
b) Trends or themes associated with the complaints, or their management
c) Identification and rectification of systemic issues
d) The identification of risks to the School or ECS, and associated actions to mitigate such risks.

This analysis will be provided as a written report to:
a) In Schools, the School Council, or in the absence of a Council, their governing body (Board)
b) In ECS, the delegate/s of their Approved Provider. For ECS, where ACSQ is the Approved Provider, this is both the Executive Director (ASC), and the Nominated Supervisor's line Manager.

6   Definitions

Key terms in this Policy are indicated in bold when first used and defined as follows.

Term	Definition
ACSQ catchment	The ACSQ catchment covers an area of more than a half a million square kilometres, from Bundaberg in north central Queensland to Coolangatta on the New South Wales border and west to the borders of South Australia and the Northern Territory.
Appropriate Authority	An Appropriate Authority in a School refers to members of the senior or executive leadership team who include, but are not limited to: • The Principal • The Deputy Principal, Heads of 'Schools' (e.g. Junior, Middle, Senior), Assistant Heads, Deputy Heads, Deans and Directors. An Appropriate Authority in an ECS refers to the Director/Coordinator or Nominated Supervisor of the Service.

Approved Provider	An Approved Provider holds provider approval for the Education and Care Service under the *Education and Care Service National Law Act* 2010. The ACSQ is the Approved Provider for: • Carey Lane Early Learning Centre (ELC) • Coomera Anglican College ELC and Outside School Hours Care (OSHC) • Fraser Coast Koala Kindy and Roos Care OSHC • Little Angels Salisbury ELC • Riverwalk Robina ELC • St Alban's Wilston Early Childhood Centre • St Andrew's Little Saints ELC and OSHC • St Luke's ELC • St Hilda's Pre-preparatory and OSHC • St Paul's ELC • Sunnybank Anglican Parish OSHC • The Glennie Community Kindergarten and Pitstop OSHC • The Southport School Pre-preparatory and OSHC • Toowoomba Anglican School Kindergarten and OHSC
Complainant	A complainant is a person or organisation making the complaint, or having the complaint made on their behalf by an authorised representative.
Complaint	A complaint is the expression of dissatisfaction made to or about a School or ECS, related to its service, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. (ISO 10002)
Education & Care Services (ECS)	Commonly referred to as an Early Learning Centre, Kindergarten or Outside Hours School Care Service (including Vacation Care), an ECS is a service regulated by the *Education and Care Service National Law Act* 2010.
Licensed Clergy or lay person	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. Note, for other Queensland Dioceses (outside of ACSQ) this would be a Bishop's licence.
Nominated Supervisor (ECS)	Nominated Supervisor means an individual who is nominated by the Approved Provider of the ECS under the *Education and Care Service National Law Act* 2010 to be a Nominated Supervisor of that ECS; and who has provided written consent to that nomination.
Principal	Consistent with the *Education (General Provisions) Act* 2006, a Principal is the person responsible for the entire school's day-to-day management. Also known as a Head of the School, Headmaster/mistress or other similar title.
School	A School is a non-state school administered by the *Education (Accreditation of Non-State Schools) Act* 2017.
School: controlled	• Cannon Hill Anglican College • St John's Anglican College • The Springfield Anglican College

School: other	Anglican Schools which are not owned or controlled by ACSQ and have adopted this Policy.
School: owned	• Anglican Church Grammar School (Churchie) • Coomera Anglican College • Fraser Coast Anglican College • St Andrew's Anglican College • St Hilda's School • St Luke's Anglican School • St Paul's School • The Glennie School • The Southport School • Toowoomba Anglican School • West Moreton Anglican College
Strategic Risk	Strategic risk is the risk that an internal or external event may prevent the School, ECS or ACSQ from executing or achieving its strategic objectives. For example, through financial or reputational impact.
Whistleblowing	Whistleblowing is the deliberate, voluntary disclosure of individual or organisational Wrongdoing by a person who has or had privileged access to data, events or information about an actual, suspected or anticipated Wrongdoing within or by an organisation that is within its ability to control. Wrongdoing is behaviour within or by an organisation that is within its ability to control that is not legal, ethical or moral; and is serious in nature.

7 Related Documents

- Complaints Management in Anglican Education Guidelines and Procedures, ASC
- Protecting Children and Young People in Anglican Education Policy, ASC
- Diocesan Governance Canon, ACSQ

8 Legislative References

- *Education (Accreditation of Non-State Schools) Act* 2017
- *Education and Care Services National Law* 2018

9 Document Approval / History

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