



Geelong Lutheran College is committed to providing a safe environment for all students when they are in the care of the College.

## Definitions

<b>The College:</b>	Geelong Lutheran College St John's Newtown and Armstrong Creek
<b>Parents:</b>	Parents, Guardians, Caregivers
<b>Complaint/Grievance:</b>	Where an action or decision is considered to be unfair or inappropriate, there is the right to raise a complaint/grievance and have it considered seriously. The complaints/grievance process is intended to encompass any educational, behavioural, or school environment issues that may arise.
<b>Grievance:</b>	A complaint lodged by a staff member or volunteer.
<b>Complaint:</b>	A complaint lodged by a community member – parent, student or public.
<b>Dispute:</b>	Any argument or disagreement where a grievance (staff or volunteer) or complaint (family/student/community) has been formally raised.

## Receiving a complaint

### First Steps

- A complaint is an expression of dissatisfaction made to the College, where a response or resolution is reasonably expected or legally required. A complaint can be about any aspect of the services provided or contracted by the College, including the behaviour or decisions of staff, practices, policies and procedures or the way in which the College has handled a complaint.
- Anyone who works for the College may receive a complaint.
- Some complaints may fall outside the standard definition of a complaint, such as allegations of misconduct by a staff member, and therefore need referral or a report to be made.
- Complaints can be made in many different ways, e.g. in person, by telephone, in writing or online.

### Assessing Risk and referring certain matters

- Any staff member may receive a complaint.
- The receiving staff member should assess the complaint to identify any immediate health, safety or security risks.
- The person who receives a complaint should immediately action and/or escalate to the Executive Principal if there are risks. Any identified risks and risk management actions should then be documented by the Executive Principal.
- Some complaints are not dealt with by the College. Where there are allegations of criminal conduct, there must be a report to Police. Where there is a risk of significant harm to a student contact the Child Protection Helpline. For other risks of a child protection nature or if unsure, follow the Mandatory Reporting 2.12 CS and Child Safe Policy 2.01 CS, record the outcome and take any required action. See **[Complaints Flowchart Appendix One]**.
- Complaints may also need to be referred if the complaint is about:
  - allegations of a child protection nature against an employee
  - allegations of corrupt conduct
  - allegations of misconduct
  - possible criminal conduct
  - a risk of harm or significant harm to a child
  - privacy issues
  - early childhood complaints linked to the National Quality Framework
  - legal proceedings and requests for payment of damages
  - requests for information, including requests under the Government Information (Public Access) Act 2009.

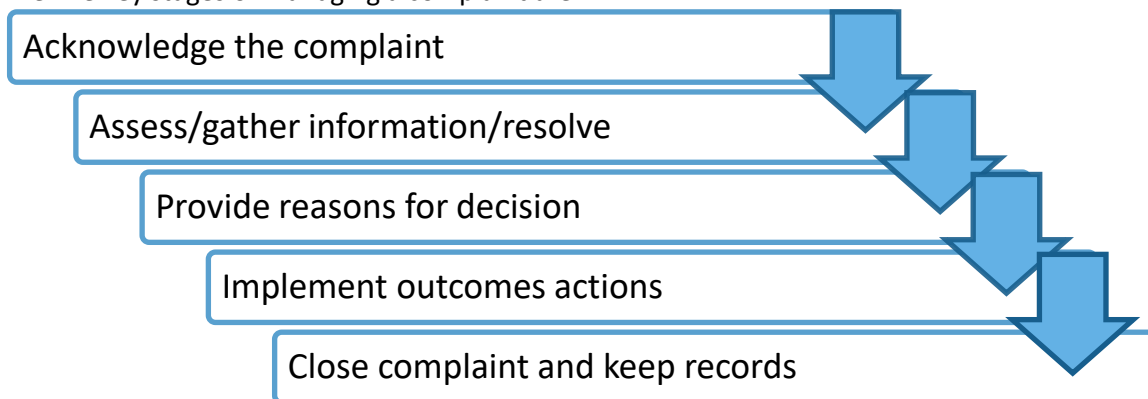


## Deciding who is the best person to manage the complaint

- If the complaint is not being referred to a specialist area as specified above and cannot be resolved directly by the staff member, a complaint manager should be identified by the Executive Principal. Any employee who has sufficient knowledge and authority about the complaint, may manage the complaint.
- Most complaints are best resolved promptly at the lowest possible level. The classroom or subject teacher is often the best person to handle routine concerns about matters within their classroom and/ or area of responsibility.
- Some complaints will need the involvement of the Executive Principal or another Leadership staff member. As issues are clarified, a complaint may be handed to another suitable complaint manager (for example, a teacher).
- Few complaints should require management at the Executive Principal level. Some complaints received at the Executive Principal or Leadership level are generally resolved more effectively at a lower level.
- In many cases, staff can manage a complaint made directly to them, even if the complaint relates to their actions. For example: where a parent complains to the classroom teacher about their programming or student behaviour management, the teacher may be able to respond to the complaint. This often also best meets the parent's needs.

## Managing the complaint

The five key stages of managing a complaint are:



## Acknowledging the complaint

When responding to a complaint it is important to deal with all complainants with respect and be helpful and positive at all times.

Complaint managers should:

- acknowledge the complaint as soon as possible, if possible within three working days. This can be done in person, by telephone, email or formally in writing. If acknowledgement was made verbally, it should still be documented by the complaint manager
- let the complainant know that they will be kept up to date with progress
- keep the matter as confidential as possible by only sharing information with those who need to know about the complaint issues
- listen carefully to the issues and resolve the complaint directly at the local level wherever possible.
- In some cases, the appropriate complaint manager may not be identified or available within 3 days. In these cases another person may acknowledge the complaint and advise the complainant who will be managing the complaint and invite them to contact the complaint manager if they have further details to provide.



## **Anonymous complaints**

Complaints can be made anonymously. If staff receive an anonymous complaint they still need to deal with the issues that are raised – to the extent possible. It is not appropriate to try to establish who made the complaint or approach anyone to ask them if it came from them. Sometimes anonymous complaints raise the most serious issues.

## **Assess, gather information and resolve**

### **Assess**

It is important to determine what the complaint is about. This may require going back to the complainant to clarify their concerns. For verbal complaints, it is useful to document the complaint issues, provide these to the complainant and ask them to confirm that the complaint has been characterised accurately.

If the process of clarifying/defining the complaint starts to indicate that the complaint issue is different from what was first raised, that should be documented and confirmed with the complainant. That way, there is agreement about the nature of the complaint.

Clarify the complainant's expected outcome. Provide information about likely outcomes for the type of complaint and be candid with the complainant if the desired outcome is not achievable.

Keep matters confidential as it is easier to handle and manage complaints when the information about the complaint is only shared on a need to know basis. While the complaint manager cannot enforce this with the complainant, it may be useful to remind them that it will assist the resolution process if only those who need to know are told about the complaint. Similarly, the complaint manager should try to maintain confidentiality to the extent that is possible.

### **Gather information**

Gather enough information to allow a proper assessment of the concerns as quickly as possible. Information to be gathered could include:

- policies and procedures
- copies of other departmental documents such as forms, reports, student records etc
- copies of previous correspondence
- information and/or accounts from students, staff or other areas
- further information from complainants.

All staff should assist the complaint manager and respond promptly and co-operatively when a complaint manager makes reasonable requests for information. Complaint Managers Toolkit: Gathering information gives further information.

If a staff member requests to have a support person present during a meeting refer to Complaint Managers Toolkit: Role of the staff support person. Complainants should also provide any additional information requested for a proper assessment of their concerns.

Complaint managers should assess each complaint issue on its merits.

### **Resolve – the complaint outcome**

Complaints should be finalised as soon as possible and no later than 20 working days. Complaint managers must keep people updated on the progress of their complaint. If a delay is anticipated, inform the complainant and other parties and provide reasons for the delay.

Consider any reasonable outcomes suggested by the complainant and any staff member complained about. However, ultimately the complaint manager determines how a complaint is to be resolved.



Outcomes will depend on the circumstances of each complaint and take into account any statutory requirements. Complaint managers should consider flexible approaches wherever possible.

**Provide Information about the complaint outcome**

Complaint managers should provide information about the outcome to the complainant. This may be in a meeting or by telephone or email.

When giving the outcome information, explain:

- the outcome of the complaint and any action that is going to be taken, by whom and when
- the reason/s for the decision
- any internal or external options for review

In any case, the complaint outcome should always be confirmed in writing. Email is acceptable.

Complex complaints may require additional record keeping (for example, file notes of contentious meetings).

While it's good practice to provide as much information as you can about outcomes, it is important keep confidential specific personal details about the management of staff.

If a person is the subject of a complaint, they should also be provided with information about the outcome.

**Implement outcome actions**

Take all reasonable steps to implement and monitor the outcomes of the complaint. Where the outcomes relate to whole of school or work area processes, the Executive Principal or other workplace manager should oversee progress and / or delegate responsibility to a specific member of staff with relevant responsibilities.

**Record Keeping**

Complaint managers should document:

- their contacts with the complainant
- how they managed the complaint
- the outcome of the complaint, including how and whether any concerns were substantiated, and the actions taken in response
- the steps taken to follow up any outcome actions

Staff resolving complaints immediately at the local level should use their professional judgment to decide what, if any, records to keep. For more information about documenting complaints, see Complaint Managers Toolkit: Meeting Record.

**Management of unreasonable conduct by people making complaints**

All staff should be accessible and responsive to people who make complaints. At the same time, proper resolution of complaints depends on:

- the College performing its functions efficiently and effectively
- the health, safety and security of the children and young people in the care of the College and the health safety and security of the college's staff
- the College's capacity to allocate resources fairly across all the complaints we receive

When people behave unreasonably in their dealings with the College, their conduct can significantly affect staff wellbeing and the progress and efficiency of the College's functions. As a result, the College will take proactive and decisive action to manage any unreasonable conduct connected with complaints and will support staff to do the same.



### **Reviews**

Complainants may request a review of the complaint outcome if they have information that:

- the complaint outcome was incorrect and/or
- the complaint handling process was unfair

Requests should be in writing and give the reasons for the request for review and which particular part of their complaint is the subject of their review request. The request should be addressed to the initial complaint manager or their supervisor. Requests for review should be made within 10 working days from the initial complaint decision, unless there are circumstances that may have reasonably prevented the complainant from requesting the review within 10 days (such as illness, needing advice from another person about seeking a review, an advocate or adviser being unavailable within the 10-day timeframe).

The review must be conducted by a more senior officer than or at least an equivalent level to the person who handled the complaint. The reviewing officer must not be the subject of the complaint in any way or have been involved in managing the complaint.

The review should be completed within 20 days of the receipt of the request, wherever possible.

### **Ongoing responsibilities**

All staff and managers have ongoing responsibilities to:

- respond to and manage complaints so that the complaints process is accessible to all members of the community
- take reasonable steps to prevent people making complaints being treated unfairly because a complaint has been made by them or on their behalf
- keep confidentiality about complaints at all times, including after a satisfactory resolution. This requires everyone, including the complainant, to ensure that information is restricted to those who genuinely need to know. People should only be told as much as they need to know and no more.
- support those involved. To the extent possible, the complaint managers should monitor the well-being of all parties involved in or impacted by the complaint and arrange support where available

### **Representation of Complaints**

Complainants may ask a representative to make a complaint on their behalf, for example, via an advocate, family member, legal or community representative or another organisation.

Wherever possible, the complainant should confirm in writing their consent to have a representative. Staff should allow the complainant to bring a nominated representative unless there are reasonable grounds to believe that their role as a representative is not appropriate, e.g. if that person poses a risk to health or safety or their entitlement to information about a child has been restricted by law. If the complainant is represented by a lawyer, it may be appropriate to seek advice from the Executive Principal, workplace manager or access legal services.

When similar complaints are made by related parties, the Executive Principal or other workplace manager should consider if it is appropriate to communicate with a single representative of the group. This will only be possible where the parties agree, and the privacy of children or others involved in the process can be maintained.

### **Evaluation**

This procedure will be reviewed as part of the school's five-year review cycle.

Reviewed:

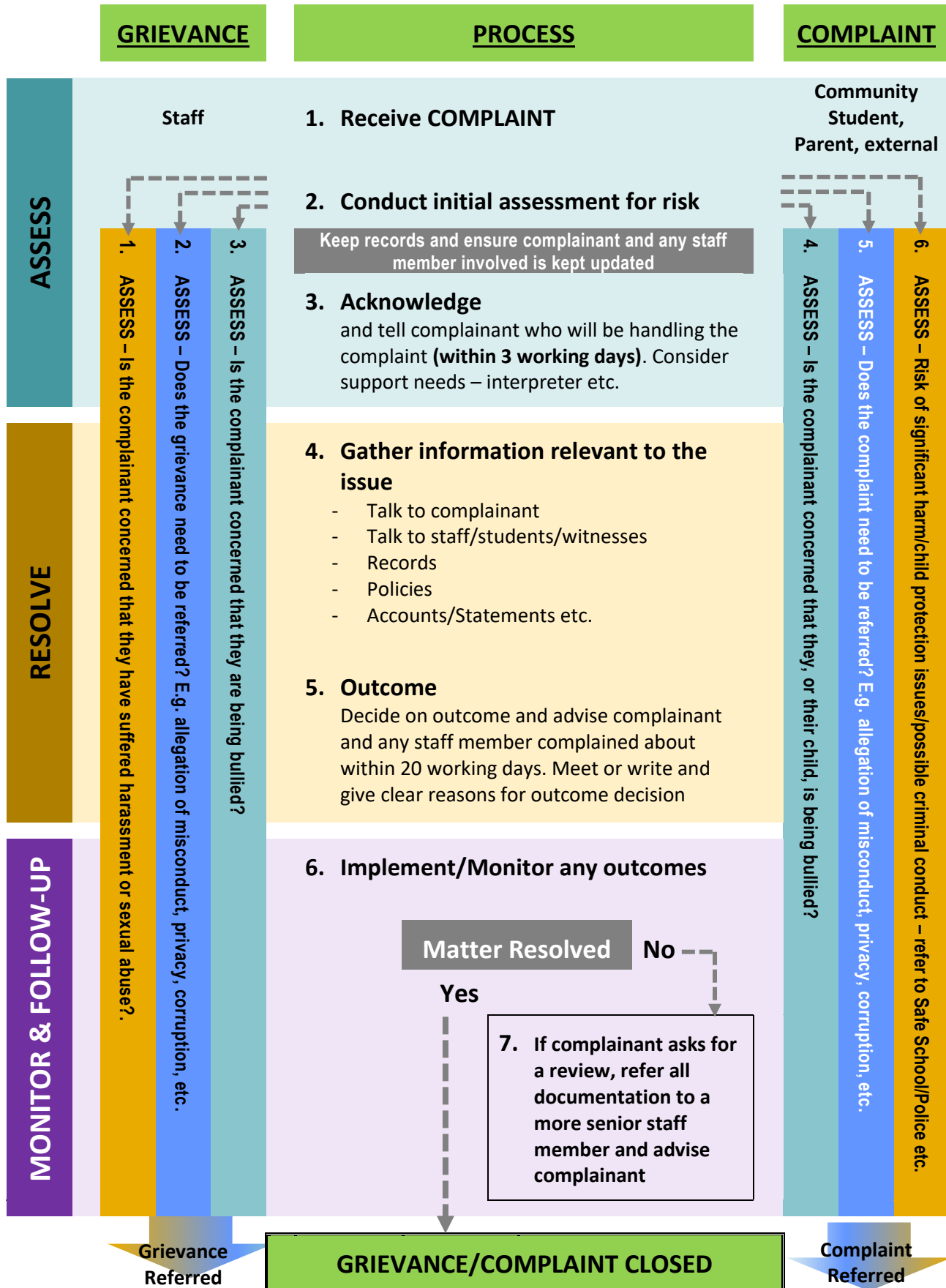
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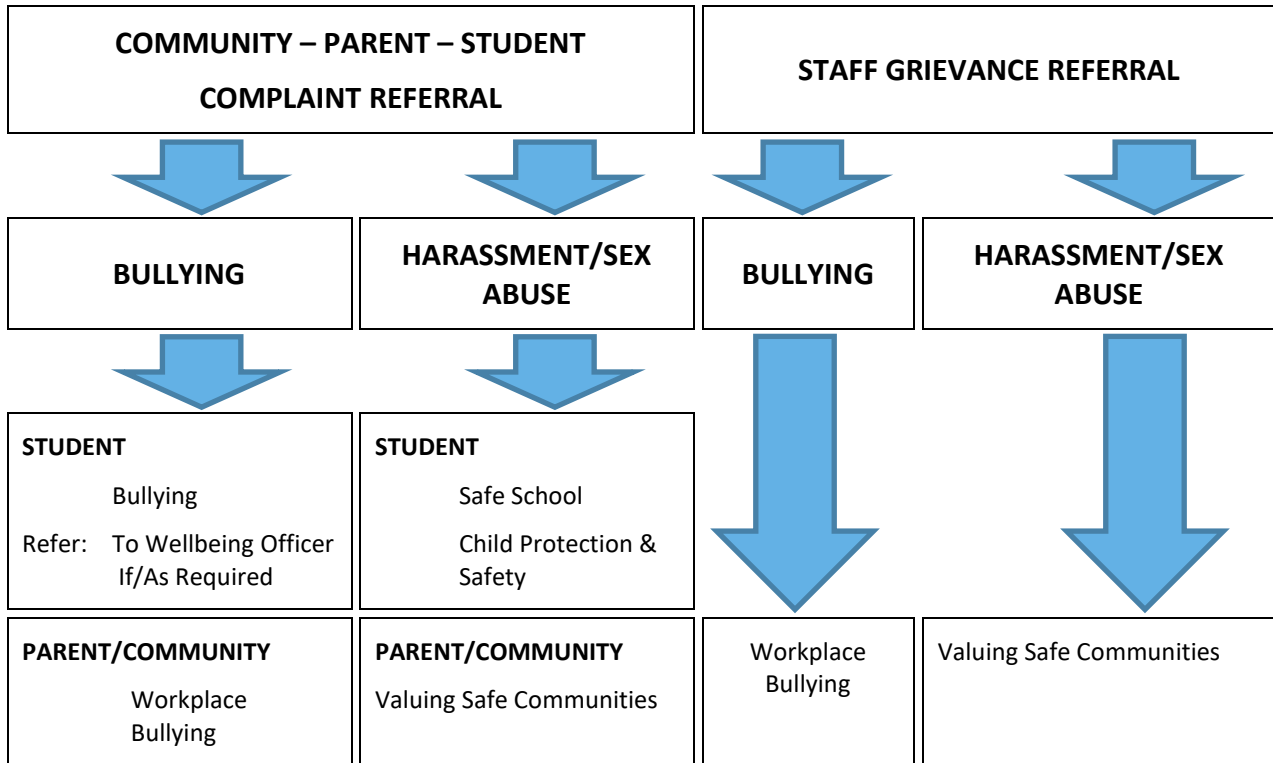


Appendix One: Complaint Flowchart





## Appendix 2: Complaints Referral Flowchart







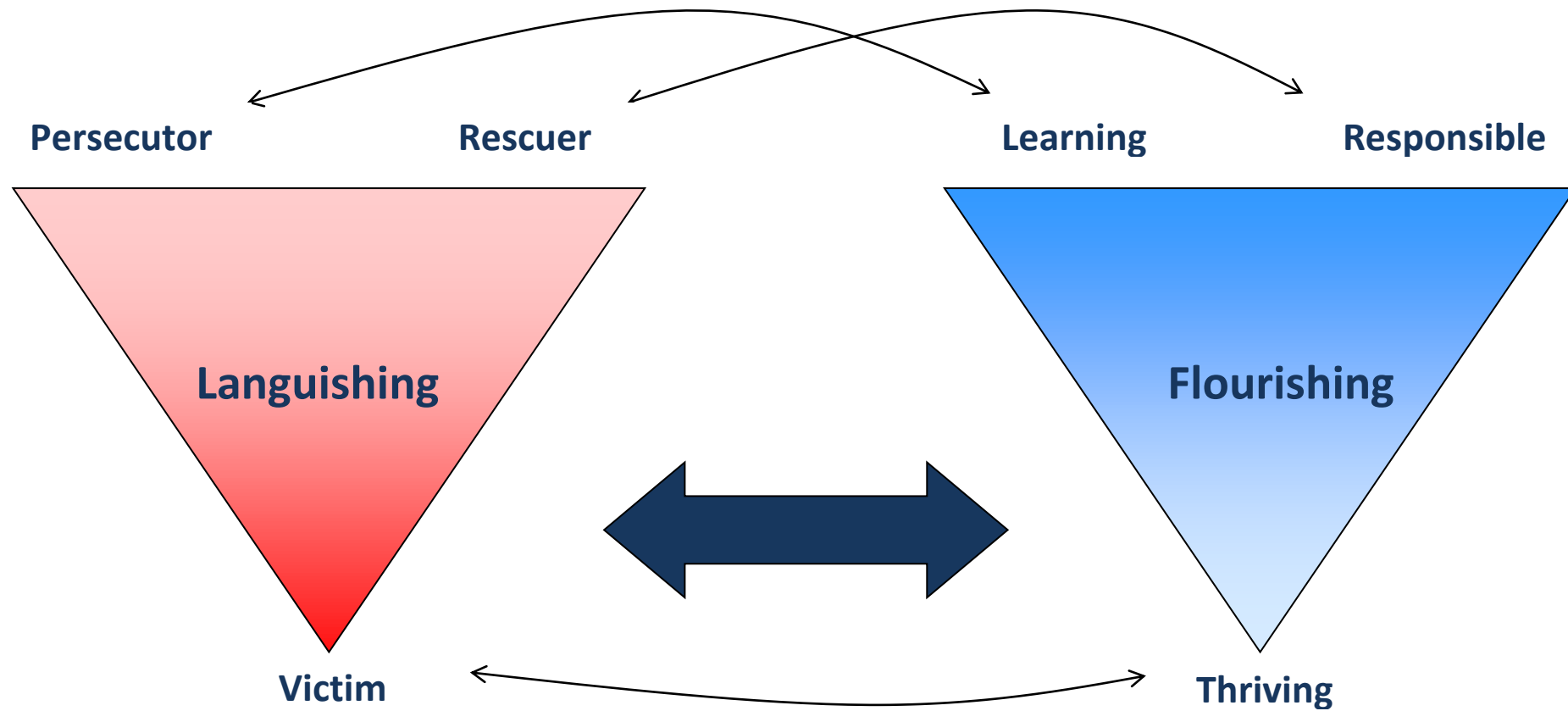
Appendix Three – Complaints Management Toolkit

# COMPLAINT MANAGER'S TOOLKIT





Complaint Manager's Toolkit  
**BEHAVIOUR TRIANGLE**





**Complaint Manager's Toolkit**  
**MEETING RECORD**

<b>Re:</b>		<b>DATE:</b>		<b>TIME:</b>	
<b>PARTICIPANTS:</b>		<b>1</b>	<b>2</b>	<b>3.</b>	
<b>4</b>	<b>5</b>	<b>6</b>		<b>7</b>	
<b>NOTES:</b>				<b>STRATEGIES</b>	
				<ol style="list-style-type: none"><li>1. Treat the other person with respect.</li><li>2. Listen until you experience the other side.</li><li>3. State your view, needs and feelings – Describe conflict in clear, concrete terms. Address who, what, where, when and why. Describe behaviours, feelings, consequences and desired changes. Start with I.</li><li>4. Explore alternative solutions – be non-judgemental.</li><li>5. Agree a solution</li><li>6. Evaluate over time.</li></ol>	
<b>AGREED ACTIONS:</b>					
<ul style="list-style-type: none"><li>•</li></ul>					
<b>FOLLOW-UP:</b>					
<ul style="list-style-type: none"><li>•</li></ul>					
<b>SIGNED</b>					



## Complaint Manager's Toolkit RECOMMENDATIONS

### A. COMPLAINTS PROCEDURE – PARENTS

The following guidelines are to assist parents if they have a concern.

Follow the recommended College 'Complaints Management' procedure

#### Complaint made to the classroom teacher

- The teacher in question should convey to the parent in question that their concerns are duly noted and will be taken seriously.
- No admissions as to the acceptability or otherwise of the teacher's actions should be made. However, the teacher should not seek to transfer blame to another member of staff, the student or the parents themselves.
- The teacher should assure the parent that their concerns will be investigated further in a prompt manner, following which, further contact will be made with the parent in order to address their concerns.
- The teacher should ask the parent whether they are happy for the matter to be dealt with by the teacher or whether they would prefer the Head of School or another member of staff to be involved in the process. As far as practicable, the requests of all parties should be complied with.

#### Complaint made to another staff member ('the Complaint Manager')

In this situation, the matter should be dealt with by the teacher against whom the complaint has been made, in conjunction with the Complaint Manager and the Executive Principal.

- The Complaint Manager should convey to the parent in question that their concerns are duly noted and will be taken seriously.
- No admissions as to the acceptability or otherwise of the actions of the teacher in question should be made. The Complaint Manager should not seek to transfer blame to another member of staff, the student or the parents themselves.
- The Complaint Manager should assure the parent that their concerns will be investigated further in a prompt manner, following which, further contact will be made with the parent in order to address their concerns.
- The Complaint Manager should indicate that the concern will be brought to the attention of the teacher against whom the complaint has been made.
- The parent should also be informed that, the complaint may also be brought to the attention of the Executive Principal (to prevent internal staff conflict).

#### Complaint made to the Executive Principal

In this situation, the matter should be dealt with by the Executive Principal.

- The Executive Principal should convey to the parent in question that their concerns are duly noted and will be taken seriously.
- No admissions as to the acceptability or otherwise of the teacher's actions should be made. The Executive Principal should not seek to transfer blame to another member of staff, the student or the parents themselves.
- At their discretion, the Executive Principal may encourage the parent to speak with the teacher directly.
- The Executive Principal should assure the parent that their concerns will be investigated further in a prompt manner, following which, further contact will be made with the parent in order to address their concerns.



- The Executive Principal should promptly meet with the teacher against whom the complaint has been made in order to investigate the cause of the complaint. A decision should then be made as to how to proceed.

Under no circumstances should the teacher against whom the complaint has been made make contact with the parent until this meeting has taken place, and then only in circumstances where the Executive Principal has reached an informed decision that such contact would be beneficial to the prompt resolution of the matter. In the event that contact with the parent is made by the teacher against whom the complaint has been made, such contact should occur in the presence of the Executive Principal.

### Helpful recommendations

- It is important that all complaints are kept confidential, and although at times parents may wish to seek support from friends or an advocate, it is very important to do this wisely. Respect for the role of the parent, teacher and the College must be maintained, and the welfare of the student must be upheld at all times. The College can only deal with issues that are raised through the recommended procedure. If staff do not receive information, then they assume that all is well.
- Make an appointment to talk to the classroom teacher at a mutually convenient time.
- Let the teacher know the matter they wish to discuss since this will facilitate the process. (This makes the most productive use of the time available – when the teacher is free to give parents his/her full attention).
- If parents consider that the issue which they have raised is still unresolved, it is important that they state this to the teacher at the conclusion of the meeting.
- Results of this meeting may include the following:
  - ◆ *The situation is monitored;*
  - ◆ *Further discussions with the people involved (e.g., Executive Principal/Head of School and teacher);*
  - ◆ *Outside support for the child or family may be sought.*
- If parents are still dissatisfied with the outcome of the meeting, they should telephone or write to the Executive Principal again to express their ongoing concerns.
- If the school does not receive further information, it is reasonable for the issue to be considered resolved.

### B. COMPLAINTS PROCEDURE- STUDENTS

Follow the recommended College Complaints procedure.

#### Helpful recommendations

- Talk with the person concerned (Student or Staff)
- Students should say what the problem is, i.e. say how they feel.
- They should say what they would like him/her to do about it. If this is too difficult, they are encouraged to take a friend with them OR speak to a trusted adult such as the school pastor, Executive Principal or teacher.
- Students should listen to the other's side of the story.
- Students should think seriously about whether there is any wrong on their side.
- Students should try to reach an agreement with the other person where they both feel OK about the outcome.
- If students still have a concern, they should go to someone in authority for assistance.
- Some Helpful Hints for Students
  - ◆ *Do not talk about the person to others – talk directly to the person.*
  - ◆ *It is better not to talk while you are angry or in public.*
  - ◆



- ◆ *Remember to pray for the right words to say, for understanding and for the issue to be resolved.*
- ◆ *All students have the right to question the assessment that the teacher has made of their work in assignments and tests. If they are not satisfied that the assessment was correct and accurate, they should:*
  - ◆ *Approach the teacher and ask for clarification;*
  - ◆ *Ask for a reassessment of the work by the teacher;*
  - ◆ *Ask the teacher to have the teacher in charge of that Learning Area – or another teacher - reassess the work;*
  - ◆ *Accept the decision as final.*

### **C. COMPLAINTS PROCEDURE – LOCAL COMMUNITY**

- Good relationships between the school and its local community give students greater opportunities to succeed and to contribute to that community. Whilst community members may at times have concerns about what happens at the school and its impact in the community, in order to restore and maintain good relationships, conflicts and complaints should be resolved so that all parties achieve satisfactory results.
- The following guidelines outline a process to assist members of the local community if they have a complaint.
- All concerns, whether they relate to students, parents, staff or programs offered by the school should be raised directly with the school. The Executive Principal is the first point of contact.
- Complaints should be kept as confidential as possible; however, the Executive Principal may need to share the concern with relevant others in the school community.
- Support from bodies within the school, such as College Board, may be sought.
- Any party has the right to be accompanied by another person in a support role at any meetings convened to discuss the resolution of the complaint.
- Where both parties determine the need for and agree to the role of a mediator in the resolution of the complaint, a mediator acceptable to both shall be appointed in consultation with LEVNT.
- Accurate records of the complaint and meetings convened must be kept.
- It is important that the complaint is dealt with as promptly and amicably as possible – the welfare and learning of students should be kept as a key focus.
- Where a satisfactory resolution to the complaint is not possible within the resources of the College, the matter should be referred to LEVNT.
- If all processes have been followed and a resolution to the complaint has not been determined, both parties may seek legal process.



## Complaint Manager's Toolkit ROLE OF THE SUPPORT PERSON

### Role of the support person at an interview or meeting

- The staff member who is the subject of the interview or meeting can have a support person or observer present, but this is not mandatory.
- When advising the staff member of the need for a meeting, they should be advised they can have a support person present and given reasonable notice to allow them to arrange for a support person to attend.
- The role of the support person is that of providing moral support and as an observer of process. The support person should not act as an advocate for the staff member they are supporting. This applies to anyone who acts as a support person including, solicitors etc.
- The role of the support person should be explained at the beginning of the meeting or interview. The support person should be advised that if they do not comply the meeting may be suspended.
- A support person can request a short time out from a meeting or interview if they see that the staff member, they are supporting needs a break or they wish to provide the staff member with advice.
- The support person's attendance at the meeting or interview should be recorded in the minutes or record of interview.
- A support person should not be someone otherwise involved in the matter being addressed. They must be independent. It is not appropriate for the staff member's supervisor to act as support person.