COMPLAINTS AND GRIEVANCES MANAGEMENT PROCEDURE

This *Complaints and Grievances Management Procedure* (Procedure) must be followed to support the implementation of *Complaints and Grievances Management Policy* (Policy).

1.0 PURPOSE

This Procedure supports the implementation of the *Complaints and Grievances Management Policy* and outlines the process for receiving, responding to and resolving complaints made under that Policy.

2.0 SCOPE

This Procedure applies to complaints made by students, parents/guardians/carers or community members in relation to St Brendan's Catholic Primary School, Lakes Entrance (the School).

This Procedure does not apply to:

- responses to critical incidents or emergencies
- alleged criminal offences
- conduct of religious clergy or other religious persons unless they are employees or Directors of Diocese of Sale Catholic Education Limited (DOSCEL).

Complaints, concerns or reports relating to suspected or alleged child abuse are reported to the Principal of the School or to the School's Child Safety Champion. Such reports are managed in accordance with DOSCEL's and the School's Child Safety policies and procedures.

This Procedure is informed by *Complaints and Grievances Management Policy*.

3.0 CONTEXT

At St. Brendan's Catholic Primary School, we believe all complaints and grievances should be acknowledged respectfully, treated seriously and addressed in a timely and transparent matter.

Establishing a clear and accessible procedure for raising concerns, ensures accountability within our school. It contributes to our positive school culture by reinforcing respectful relationships, encouraging open communication and demonstrating our school's commitment to justice and the wellbeing of all members of the community.

4.0 PROCEDURES

4.1 Managing Complaints at the School

4.1.1 The School welcomes feedback, both positive and negative, and is committed to continuous improvement. The School values open communication with families and community members and is committed to understanding complaints and addressing them appropriately.

4.1.2 Students attending the School who have a concern or complaint are encouraged to raise the issue with a trusted adult at the School (for example, their classroom teacher, Year Level Coordinator, Wellbeing staff, Learning or Education Support staff member).

4.1.3 This person takes the concern or complaint seriously and explains what steps the student can take to try to resolve the issue. Students can also ask their parent/guardian/carer or another trusted adult outside of the School to talk with the School on their behalf about the issue.

4.1.4 The School encourages parents, guardians, carers or other members of the school community who may wish to submit a concern or complaint to:

- carefully consider the issues you would like to discuss
- remember you may not have all the facts relating to the issues that you want to raise
- think about how the matter could be resolved
- be informed by checking the school policies and guidelines

4.1.5 Parents/guardians/carers of students attending the School who have a complaint, in the first instance, make the complaint to the School, except when the complaint is about the Principal of the School.

4.1.6 Concerns in the first instance should be directed to your child's teacher or home group teacher. Where possible, school staff will work with you to ensure that your concerns are appropriately addressed.

4.1.7 The Principal is responsible for the efficient and effective organisation, management of complaint-handling processes.

4.1.8 Formal complaints are to be made to the Principal in writing (by letter or email) or verbally (in person or over the phone).

4.1.1 The Principal considers whether a request for information sharing under the CISS or FVISS may be appropriate, having regard to any concerns relating to the wellbeing or safety of a child or a group of children or any risk of family violence, in line with MARAM.

4.1.1 Complaints will be acknowledged as soon as possible (usually within two school days), and the school will seek to resolve complaints in a timely manner.

4.1.2 Depending on the issues raised in the complaint, the Principal, Deputy Principal or delegate may need to gather further information to properly understand the situation. This process may also involve speaking to others to obtain details about the situation or the concerns raised.

4.1.3 Where possible, a resolution meeting will be arranged with the Principal (Principal Delegate) to discuss the complaint with the objective of reaching a resolution satisfactory for all parties.

4.1.1 The School will complete any necessary information gathering and hold a resolution meeting where appropriate within 10 working days of the complaint being raised.

4.1.2 If after the resolution meeting the complaint remains unresolved the school will work with the parent/guardian/carer to produce a written summary of the complaint in the event you would like to take further action. In some circumstances, the principal may determine that a resolution meeting would not be appropriate. In this situation, a response to the complaint will be provided in writing.

4.1.3 In situations where further time is required the School will consult with parents/guardians/carers and discuss any interim solutions to the dispute that can be put in place.

4.1.4 In support of the resolution of the compliant where required the Principal consults with DOSCEL School Leadership Consultant to resolve or address the complaint. The Principal and DOSCEL School Leadership Consultant (SLC) will engage relevant Workplace Relations Manager (IR/ER), if required, to support resolution of the complaint.

4.2 Misconduct or Serious Misconduct

4.2.1 All complaints of alleged misconduct or serious misconduct by a teacher or staff member are to be reported to the Principal of the School who informs the DOSCEL Executive Director, via the Chief People Officer, DOSCEL.

4.2.2 Complaints about registered teachers can also be reported to the Victorian Institute of Teaching (VIT), which is the regulator in relation to the registration and investigation of serious misconduct—including conduct which is of a physical or emotional nature—of all registered teachers in the State of Victoria. If unsure if the complaint constitutes serious misconduct by a registered teacher, contact VIT on telephone 1300 888 067 or email vit@vit.vic.edu.au.

4.3 Complaints Against the Principal of the School

4.3.1 Complaints regarding the Principal of the School, are to be reported to the Chief People Officer, DOSCEL, immediately.

4.4 Complaints About Privacy or Information Sharing

4.4.1 Privacy complaints or complaints relating to the way in which the Child Information Sharing Scheme (CISS) or Family Violence Information Sharing Scheme (FVISS) are being applied are referred to the Principal or the Chief Governance Officer, DOSCEL.

4.4.2 If a complaint about privacy or information sharing is not resolved by the School or the DOSCEL Office, it may be referred to the Office of the Victorian Information Commissioner or the Health Complaints Commissioner (under Victorian law) or the Office of the Australian Information Commissioner (OAIC) (under Commonwealth law).

4.5 Complaints By, or On Behalf of, Students with a Disability

4.5.1 Students with disabilities have rights under the Disability Discrimination Act 1992 (Cth), the Disability Standards for Education 2005 (Cth) and the Equal Opportunity Act 2010 (Vic.) to access their education on the same basis as their peers, including the right to reasonable adjustments.

4.5.2 As with all complaints to which this Procedure applies, parents/guardians/carers raise any concerns or complaints regarding the treatment of a student with a disability with the School Principal in the first instance.

4.5.3 The School also recognises that parents/guardians/carers of students with a disability can raise complaints or concerns regarding a student with a disability in several forums, including:

- in consultation with the Principal and any established student support group, to the relevant School Leadership Consultant. This may relate to matters arising under the Program for Students with Disabilities, including applications, Years 6 to 7 reviews, reappraisals and appeal procedures.
- the Australian Human Rights Commission – in relation to complaints regarding compliance with the *Disability Discrimination Act 1992* (Cth) or the *Disability Standards for Education 2005* (Cth).
- the Victorian Equal Opportunity and Human Rights Commission – in relation to complaints regarding compliance with the *Equal Opportunity Act 2010* (Vic).

4.6 Anonymous Complaints

4.6.1 The School may not be able to fully address complaints that are made anonymously or without sufficient detail being provided to enable an investigation or resolution of the matter. To ensure procedural fairness, respondents have a right to know the particulars of the allegation(s) being made against them and be given an opportunity to respond to them.

4.7 Conduct of Parties During Complaint Resolution Process

4.7.1 When making and addressing a complaint, it is expected that parents/guardians/carers, students and school staff:

- show respect and understanding of each other's point of view
- operate within applicable legislation
- acknowledge that their goal is to achieve an outcome acceptable to all parties
- act in good faith and in a calm and courteous manner
- recognise that all parties have rights and responsibilities which must be balanced.

4.7.2 If, at any point in the process outlined in this Procedure, the decision-maker considers a parent/guardian/carer or student's behaviour to be unreasonable, the decision-maker communicates in writing the basis on which it has been determined that the parent/guardian/carer or student acted unreasonably. The decision-maker also indicates an acceptable procedure for future communication with the parent/guardian/carer or student about their complaint.

Behaviour is considered unreasonable when:

- it is clearly and significantly outside the expectations of cooperation, courtesy and respect
- it calls for staff resources and time unjustified by the nature or significance of the complaint
- an action or complaint is brought without merit, often to cause annoyance to another person
- it is oriented towards conflict.

4.8 Support Persons

4.8.1 At any point of the complaint process, a parent/carer/guardian or student can be supported by a support person. The role of the support person in this process is a supportive and enabling one. A complainant's support person may be a member of the family, a friend, a community member or a person provided through an appropriate support/advocate agency (provided the person does not receive a fee for service).

An advocate/support person's role includes:

- assistance for the complainant to clarify the issues in the complaint
- discussion of difficulties being experienced by the complainant
- assistance in the development of a cooperative and collaborative working relationship between the complainant and the school community

- assistance for the complainant to understand the School and DOSCEL's policies and guidelines and the resolution being proposed for the complaint.

4.8.2 The complainant informs the Principal (or DOSCEL, during any complaint escalation process) if they want to include a support person in the complaint process and provides the name of the support person, contact details and the relationship to the complainant.

4.9 Record-keeping

4.9.1 The School is required to comply with record-keeping obligations in relation to complaints under the CISS, FVISS and Family Violence Multi-Agency Risk Assessment and Management Framework (MARAM) (for further information, see: Information Sharing and Family Violence Reforms Contextualised Guidance, Child Information Sharing Scheme Ministerial Guidelines, Family Violence Information Sharing Guidelines, and Family Violence Multi-Agency Risk Assessment and Management Framework).

4.9.2 The *Principal* treats parent/guardian/carer and student concerns seriously and reflects on the issues raised through complaints to, where appropriate, change their practices and improve the learning opportunities for students.

4.9.3 The School maintains and publicises a fair, effective and efficient complaint-handling process, so that complaints about events or decisions at the School can be addressed.

4.9.4 The School ensures that its school community is aware of the complaint-handling procedures, which are publicised on the School's website. The School also ensures that its school community is aware of processes for complaint escalation to DOSCEL.

4.9.5 The School reviews its complaint-handling procedures regularly.

4.10 Receiving Complaints Directly from Students

4.10.1 Students are encouraged to raise concerns with a trusted adult if anything makes them feel uncomfortable or unsafe.

4.10.2 School staff are expected to receive complaints thoughtfully, taking care to validate students' experiences – what may seem small to an adult might not be to a child.

4.10.3 The School ensures that student complaints are managed in accordance with the relevant school policies (e.g. Anti-Bullying and Bullying Prevention Policy, Child Safety policies and procedures), including ensuring processes are confidential to the parties involved.

5.0 ESCALATION OF COMPLAINTS

It is not always possible to resolve all complaints to the parent/guardian/carer or student's

satisfaction. Options for escalation of a complaint are detailed below.

5.1 Complaint Escalation to DOSCEL Office

5.1.1 When a complaint cannot be resolved using the School's complaint-handling procedures, the Principal seeks advice from the DOSCEL Office.

5.1.2 When a parent/guardian/carer or student is not satisfied with the manner in which their complaint has been treated by the School, is not satisfied that their complaint has been resolved by the School, or their complaint is about the Principal of the School, the parent/guardian/carer on behalf of a student contacts the DOSCEL Chief People Officer.

5.1.3 DOSCEL has responsibility to respond to complaints when:

- a complainant is not satisfied that the complaint has been addressed in accordance with the School's complaint-handling processes
- a complainant is not satisfied that an acceptable resolution has been reached
- the subject of the complaint relates to DOSCEL's educational policy outside the responsibility/management of the School
- the School requests assistance to resolve a complaint
- the subject of the complaint is the Principal of the School.

5.2 Actions to be taken following the receipt of a complaint by DOSCEL

Following receipt of a complaint by DOSCEL, the Chief People Officer (or delegate):

5.2.1 acknowledges receipt of the complaint as soon as possible, ensuring the complainant is aware of the complaint-handling procedures that will be used to respond to the complaint

5.2.2 assesses the complaint, which can result in the DOSCEL Office taking whatever action is considered appropriate to the resolve the complaint, including any of the 'resolution options' described below

5.2.3 where necessary, seeks advice from within DOSCEL and/or external agencies to determine how a complaint should be managed and whether other avenues of appeal/redress already exist (this may include seeking specialist or technical advice from external agencies and/or DOSCEL Office to support the School in addressing the complaint or to inform DOSCEL's decision-making where a complaint involves a student with a specialist area of need)

5.2.4 where appropriate, considers whether a request for information sharing under the CISS or FVISS may be appropriate, having regard to any concerns relating to the wellbeing or safety of a child or a group of children or any risk of family violence, in line with the MARAM

5.2.5 where appropriate, informs the Principal of the receipt of the complaint and

provides an opportunity for the Principal to respond to the issues raised

5.2.6 advises the complainant of any delays that may occur in the DOSCEL Office's ability to respond within a reasonable timeframe

5.2.7 where appropriate, provides the complainant with an opportunity to respond to the Principal's response to the matters raised prior to making a decision about the complaint

5.2.8 where necessary, actively supports the complainant with additional needs in the complaint process by providing appropriate support

5.2.9 provides the complainant and the Principal of the School with the results of the DOSCEL Office's considered view of the complaint

5.2.10 keeps a record of each complaint and its outcome (the complainant should be advised that a record is being maintained).

5.2.11 At all times, DOSCEL retains discretion to manage complaints in any manner it considers appropriate, having regard to the principles of complaint management set out in the Complaints and Grievances Management Policy.

5.3 Resolution options

5.3.1 The DOSCEL Office takes whatever action is considered appropriate to the address the complaint, including by allowing more time for resolution at the School or by providing assistance to the School to resolve the complaint.

5.3.2 The DOSCEL Office allows more time for resolution at the School when:

- the issues have not been raised with the School
- the School is continuing to address the issues in the complaint
- the issues raised are the responsibility of the School (e.g. school uniform, canteen shop duty)
- the issues raised can be resolved at the school level.

5.3.3 The DOSCEL Office also provides assistance to the School to resolve the complaint, for example, when:

- support is requested by the Principal and/or complainant
- it is evident that there is a disruption to the learning program of the student involved in the complaint, including non-attendance at school
- the Chief People Officer is of the belief that the matter can be resolved with the support of the DOSCEL Office.

5.3.4 If the DOSCEL Office determines the action taken by the School is appropriate and assesses that no further action is required to address the complaint, the DOSCEL Office advises the parent/carer/guardian in writing and explains the

basis upon which that conclusion has been reached.

5.4 Complaint Escalation to DOSCEL Executive Director

5.4.1 If a complaint remains unresolved after referral to the DOSCEL Office, parents/ guardians/carers can request a review of process through the Executive Director, DOSCEL.

5.4.2 The DOSCEL Executive Director (or their delegate) takes whatever action is considered appropriate to resolve the complaint, including any of the 'resolution options' described above for the DOSCEL Office.

5.4.3 At all times, the DOSCEL Executive Director retains discretion to manage complaints in any manner considered appropriate, having regard to the principles of complaint management set out in the Complaints and Grievances Management Policy. The DOSCEL Executive Director (or their delegate), requires the undertaking of a review, for example, when:

- it appears that the School has not followed the l complaint-handling procedure
- the School and the complainant were unable to resolve the complaint in a way that was appropriate and fair and consistent with policy and procedure.

5.4.4 The complainant is informed about the scope and timing of the review.

5.4.5 All reviews will:

- provide the School Principal with a copy of the complaint or a summary of the issues being raised in the complaint
- provide opportunities for the School to explain the process followed when the School addressed the complaint and how the decision provided to the complainant was reached (the reviewer or DOSCEL Executive Director (or delegate of the DOSCEL Executive Director) may ask the School to provide a response in writing)
- provide an opportunity for the complainant to clarify and respond to the matters they have raised and to comment on the School's response to the complaint
- provide the Principal with the issues raised and give 10 school days for the Principal to respond to the reviewer in writing, when the complaint is about the Principal
- provide recommendations for the DOSCEL Executive Director, DOSCEL (or delegate of the DOSCEL Executive Director) to consider, to resolve the complaint, once the review has been completed
- provide a response to the complainant.

5.5 Independent investigation

5.5.1 The DOSCEL Executive Director (or their delegate) arranges for an independent investigation, for example, where:

- the complaint is particularly complex
- there is a difference of opinion about the facts in relation to the complaint
- the issues raised by the complainant are serious and/or appear to be in breach of DOSCEL policy and/or procedure
- the issues raised in the complaint concern the ability of a child or young person to participate fully in their educational program
- the complaint indicates the existence of a systemic problem.

5.5.2 An independent investigation will:

- Will established Terms of Reference developed by the DOSCEL Executive Director, DOSCEL (or their delegate)
- develop an investigation plan that defines the subject of the investigation
- comply with relevant privacy laws and maintains confidentiality
- provides procedural fairness
- gathers evidence, including oral, documentary and expert (technical advice)
- provides an Investigation Report to the DOSCEL Executive Director, DOSCEL, which includes a summary of the investigation, its findings and recommendations (if applicable).

5.5.3 At the conclusion of an independent investigation, the DOSCEL Executive Director (or their delegate) considers the information provided in the Investigation Report to determine the outcome of the complaint.

5.5.4 The outcome is provided to the complainant and the School Principal and to any others deemed to require a response because of their involvement in the complaint.

5.5.5 Every effort is made to ensure that there is no actual or perceived conflict of interest in the selection and appointment of an independent investigator.

5.6 Possible Outcomes of a Complaint

5.6.1 Where the DOSCEL Office or DOSCEL Executive Director (or their delegate) (as applicable) determines that the complaint is justified, advice is provided to the School for action. This could include:

- an apology or expression of regret
- a change of decision
- a change of policy, procedure or practice
- a refund of payments

- the provision of counselling or other support.

5.6.2 Where the DOSCEL Office or DOSCEL Executive Director (or their delegate) (as applicable) determines that the complaint is not justified, the decision of the School is confirmed. This could include:

- an explanation of how the decision is consistent with policy and/or procedure
- an explanation that the decision taken is realistic and is supported by an external agency that specialises in the area under consideration
- an explanation that policy, guidelines and/or procedures support the decision.

5.6.3 It is not the role of the DOSCEL Office to 'sanction' the School and this is not a possible outcome of a complaint.

5.6.4 Due to DOSCEL's obligations under privacy laws, it is not appropriate for the DOSCEL Office to disclose details of disciplinary proceedings relating to its employees. For this reason, it may not be lawfully possible for the DOSCEL Office to inform a complainant of any specific action that has been taken in relation to individuals about whom complainants have raised complaints.

5.7 Complaint Escalation to External Bodies

5.7.1 If a parent/guardian/carer is dissatisfied with the outcome or response from the DOSCEL Office, or if they feel their complaint is not being handled properly or in a timely manner, they may take their complaint to an external agency such as the VIT, Victorian Equal Opportunity and Human Rights Commission (VEOHRC), the Australian Human Rights Commission (AHRC) or the Victorian Registration and Qualifications Authority (VRQA).

5.7.2 Where a parent/guardian/carer has real and substantial concerns that, as a result of raising a complaint, they may suffer a detriment and the allegations relate to corrupt conduct, they are made aware that they are able to take their complaint to an external agency such as VIT, VEOHRC, the AHRC or VRQA.

6.0 ROLES, RESPONSIBILITIES AND ACCOUNTABILITIES

ROLE	RESPONSIBILITY	ACCOUNTABILITY
School Principal	Receives and manages complaints (except complaints in relation to the School Principal)	DOSCEL Executive Director
School Leadership Consultant	Advises and supports the Principal.	DOSCEL Deputy Executive Director
DOSCEL Chief People Officer (or another appropriate delegate of	Manages escalated complaints that are unable to be resolved at	DOSCEL Executive Director

the DOSCEL Executive Director)	the school level.	

7.0 COMMUNICATION

This Procedure is available to parents on the School website

This Procedure is available to staff via the staff portal and staff are briefed annually on this policy.

8.0 PROCEDURE INFORMATION

Procedure Owner	St Brendan's Catholic Primary School, Lakes Entrance
Approving Authority	Principal
Risk Rating	Medium
Implementation	March 2026
Review Date	2028

PROCEDURE DATABASE INFORMATION	
Supporting Documents	Complaints and Grievances Management Policy Child Safety and Wellbeing Policy Behaviour Management Policy and Procedures Child Safety Code of Conduct Parent, Guardian and Carer Code of Conduct Student Code of Conduct

APPENDIX 1- COMPLAINTS MANAGEMENT FLOWCHART

COMPLAINT PROCEDURE			
STEPS	**COMPLAINANT**	**SCHOOL (Principal / Delegate)**	**DOSCEL**
1	**Raise a concern or complaint** Student raises issue with trusted adult at school or parent/guardian/carer raises with teacher / home group teacher or lodges formal complaint with Principal	**Receive complaint** Encourage open communication and treat complaint seriously *Timeframe callout:* Acknowledge as soon as possible (usually within 2 school days)	**Provide support to the School** DOSCEL School Leadership Consultant supports Principal, where required.
2	**Provide information** Provide information (as requested) and participate in information gathering / meeting.	**Gather information** Principal / Deputy Principal / delegate gathers further information as required *N.B. Consider information sharing* *Consider CISS/FVISS request where appropriate, in line with MARAM*	**Provide support to the School** DOSCEL School Leadership Consultant supports Principal, where required.
3	**Attend resolution meeting** Attend meeting (with support person if desired) and discuss resolution options.	**Hold resolution meeting** Arrange a resolution meeting where possible (4.1.3). *Timeframe callout:* Complete information gathering and hold meeting (where appropriate) within 10 working days of the complaint being raised **Decision:** *Resolved?* **If YES:** confirm outcome and close out complaint	**Provide support to the School** DOSCEL School Leadership Consultant supports Principal, where required.

		If NO: provide written summary / written response and advise escalation options	
4	**If unresolved:** request written summary and/or choose to escalate	**Seek support / escalate** Principal seeks advice from DOSCEL Office Workplace Relations Manager (IR/ER) where complaint cannot be resolved *Timeframe callout:* If further time is required, consult with parents/guardians/carers and discuss interim solutions	**Provide support to the School** DOSCEL School Leadership Consultant supports Principal.
COMPLAINT ESCALATION			
5	**Escalate to DOSCEL Chief People Officer** When not satisfied with how the School handled/resolved the complaint, or where the complaint is about the Principal).	**Request further DOSCEL advice/support** Principal seeks advice from DOSCEL Office when unable to resolve.	**DOSCEL assumes responsibility to respond** Triggers for DOSCEL response are set out in 5.1.3.
6	**Participate in DOSCEL process** Complainant may be asked for clarification and may respond to the School's response before a decision is made (5.2.1–5.2.9).	**Provide information to DOSCEL** Principal is informed and given opportunity to respond where appropriate **Decision:** *Is the matter suitable to return to School for more time or support?* If **YES**, DOSCEL may allow more time or provide assistance **Continue local resolution** School continues to address issues, potentially with DOSCEL assistance (5.3.1–5.3.3).	**Actions following receipt by DOSCEL** Chief People Officer (or delegate) undertakes actions in 5.2.1–5.2.11 (acknowledge, assess, seek advice, manage delays, provide outcome, keep records). **Resolution options applied** DOSCEL may determine no further action is required and advise in writing (5.3.4), or apply resolution options (5.3).

7	**Escalate to Executive Director review** If complaint remains unresolved after referral to DOSCEL Office, request review of process	**Respond to review requests** School may be asked to provide process explanation and/or written response	**Executive Director review** Executive Director (or delegate) manages review and may take action to resolve **Decision:** *Is an independent investigation required?* This may occur for complex/serious/systemic matters **Independent investigation** Executive Director (or delegate) arranges and considers investigation and outcomes are communicated (5.5.1–5.5.5).
8	**Outcome received** Complainant receives outcome and, where applicable, explanation of decisions and limits on disclosure	**School action (if required)** If complaint is justified, School may be advised to take action (5.6.1).	**Possible outcomes** Possible outcomes are set out in 5.6 (including apology, change of decision, change of policy/practice, refund, support).
9	**External escalation (optional)** If dissatisfied with DOSCEL outcome/response, complainant may escalate to an external body (5.7.1) and in limited circumstances may go directly to an external body where detriment is feared (5.7.2).		**External bodies** Examples include VIT, VEOHRC, AHRC and VRQA (5.7.1–5.7.2). See *Appendix 2 External Escalation Flowchart*.

Note: This flowchart is a summary only. Detailed requirements and responsibilities are set out in **Sections of the procedure**