

# **Complaint Handling Policy**

Review Period	Last Review	Next Review
2 years	October 2022	October 2024

## **Section 1 - Purpose**

To ensure that student, parent, staff, employee and volunteer complaints and disputes at Ipswich Grammar School (The School) are dealt with in a responsive, efficient, effective and fair way.

### Section 2 - Overview

The School is committed to ensuring a safe and engaging learning environment, characterised by respect. Part of this commitment involves ensuring the overall School community has access to processes that allow for complaints to be managed appropriately, promptly and fairly. The School is a working community and inevitably concerns, complaints, disputes or allegations of inappropriate or illegal behaviour may arise.

This policy provides clear and transparent information about how a parent, student, staff member, volunteer, contractor or other member of the School community can raise complaints about the School, staff conduct, a student's education and/or student wellbeing, and about how such complaints will be managed and resolved.

The School takes all concerns and complaints received from staff, parents, students, staff members and other complaints from outside of the School, seriously. Our aim is to ensure that all complaints are handled objectively and with sensitivity. In doing so, we will seek to identify both the specific and systemic issues (where applicable) raised by complainants (thereby enabling future improvements to be identified and implemented).

**Ipswich Grammar School:** 

- acknowledges the right of staff, students, parents and employees to complain when dissatisfied with an action, inaction or decision of the School and the School encourages constructive criticism;
- views complaints as part of an important feedback and accountability process;
- recognises that time spent on handling complaints can be an investment in providing a better service or environment to students, parents and employees; and
- is committed to ensuring that student, parent and employee complaints are dealt with in a responsive, efficient, and effective and fair way.

# **Section 3 - Scope**

This policy applies to all School Board members, staff, contractors, volunteers, visitors, parents/guardians, students and other members of the School community.

This policy does not apply to:

- Staff disputes or grievances in respect to industrial matters, which are set out in the Dispute and Grievance Resolution Procedure of the Ipswich Grammar School Collective Agreement 2021;
- Concerns about child or student abuse and student safety, which will be addressed in accordance with the School's Student Protection Policy; or
- Legal matters, including requests for compensation, payment and redress.

To the extent that there are otherwise any inconsistencies between this policy and the School's other policies, schedules and appendices, this policy shall prevail.

## **Section 4 - Policy**

## **Principles**

Ipswich Grammar School is committed to managing complaints according to the following principles:

- all members of the School community are entitled to have access to appropriate and easily understandable information regarding the complaint resolution process being followed by the School;
- complaints will be resolved with as little formality and disruption as possible;
- complaints will be taken seriously;
- complaints raised by anonymous complainants will be treated on their merits;

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- complaints will be dealt with confidentially, fairly and objectively and in a timely manner;
- complaints will be considered impartially (with consideration of any power imbalances) and dealt with on the merits;
- the School will determine the appropriate person to deal with the complaint in the first instance; mediation, negotiation and informal resolution are optimal alternatives;
- confidentiality and privacy will be maintained as much as possible;
- all parties to the complaint will be appropriately supported, with a focus on maintaining the emotional wellbeing of any students involved;
- relevant parties will be kept informed of the progress and outcome of the complaints;
- · appropriate solutions will be offered and implemented;
- complainants, respondents and people associated with them will not be victimised or subject to reprisal as a result of lodging the complaints and they will not suffer any other reprisals;
- the School will keep records of complaints; and
- the School's insurer will be informed if a complaint could be connected to an insured risk.

In return, the School expects that a member of the School community who raises a complaint will:

- treat others (including staff members, students and parents, both former and present) with respect and courtesy;
- raise complaints in the appropriate forum, having regard to the below framework, and as soon as possible after the event giving rise to the complaint has occurred;
- provide complete and factual information about the complaint;
- ask for assistance or further information as needed;
- act in good faith to achieve a reasonable outcome; and
- be understanding and accepting of any outcome reached, being mindful that the School must sometimes manage the interests of a number of students and other individuals when making decisions, and may be privy to confidential information not known to the person raising the complaint.

Our aim is for the prompt resolution of concerns, ideally without there being a need for a formal complaint to be made. As the Board of Trustees appoints the Headmaster to manage the day-to-day operations of the School, a review by the Board Chair should be a last resort.

Time frames listed in this policy are only a guide, and may vary due to the nature of the complaint and surrounding circumstances. Where time frames set out in this policy cannot be met, the School will strive to communicate with the affected parties about the status of the complaint, and the steps taken (or to be taken) to progress a resolution.

Please note the processes outlined in this policy are intended to be conciliatory, non-adversarial and non-legal.

## Responsibilities

#### **The School**

The School has the following role and responsibilities:

- develop, implement, promote and act in accordance with this policy;
- appropriately communicate this policy to students, parents and staff members;
- ensure that this policy is readily accessible by staff members, students and parents;
- upon receipt of a complaint, manage the complaint in accordance with this policy;
- ensure that appropriate support is provided to all parties to a complaint;
- take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them;
- appropriately implement remedies;
- appropriately train relevant staff;
- keep records;
- conduct a review/audit of the Complaints Register from time to time;
- monitor and report to the Board of Trustees on complaints;
- report to the School's insurer when that is relevant; and

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refer to the School's Board of Trustees immediately any claim for legal redress.

#### **All Parties to a Complaint**

The complainant and respondent both have the following role and responsibilities:

- apply and comply with this policy;
- lodge the complaint as soon as possible after the issue arises;
- expect that the complaint will be dealt with fairly and objectively; in a timely manner; with procedural fairness wherever practicable; that confidentiality and privacy will be maintained as much as possible;
- provide complete and factual information in a timely manner;
- not provide deliberately false or misleading information;
- not make frivolous or vexatious complaints;
- act in good faith, and in a calm and courteous manner;
- act in a non-threatening manner;
- to be appropriately supported;
- acknowledge that a common goal is to achieve an outcome acceptable to all parties;
- recognise that all parties have rights and responsibilities which must be balanced;
- maintain and respect the privacy and confidentiality of all parties; and
- not victimise or act in reprisal against any party to the dispute or any person associated with them.

## **Staff Receiving Complaints**

#### Staff receiving complaints have the following role and responsibilities:

- act in accordance with this policy;
- inform the party lodging the complaint of how complaints can be lodged, when they should be lodged and what information is required;
- provide the complainant with information about any support or assistance available to assist them in lodging their complaint;
- provide the complainant with a copy of this policy and relevant contact information;
- maintain confidentiality;
- keep appropriate records;
- to forward complaints to more senior employees, including the Headmaster, as appropriate; and
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

# **Implementation**

To implement this policy, Ipswich Grammar School:

- is committed to raising awareness of the process for resolving complaints at the School, including by the development and implementation of this policy and related procedures, and via the clear support and promotion of the policy;
- is also committed to appropriately training relevant staff (especially senior staff) on how to resolve complaints in line with this policy and the related procedures;
- will keep appropriate records of complaints, will monitor complaints and their resolution and will report on a high-level basis to the Board of Trustees on complaint handling at the School; and
- will act to encourage students, parents and staff to contribute to a healthy school culture where complaints are resolved with as little formality and disruption as possible.

# **Section 5 – Procedures, Resources and References**

Refer to the following documents and resources which are established in accordance with this policy:

- Education (Accreditation of Non-State Schools) Regulations 2017 (Qld);
- Australian Education Regulations 2013 (Cth);
- Fair Work Act 2009 (Cth);
- Work Health and Safety Act 2011 (Qld);
- Privacy Act 1988 (Cth);

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- Anti-Discrimination Act 1991 (Qld);
- Australian Human Rights Commission Act 1986 (Cth);
- Sex Discrimination Act 1984 (Cth);
- Age Discrimination Act 2004 (Cth);
- Disability Discrimination Act 1992 (Cth);
- Racial Discrimination Act 1975 (Cth);
- Ipswich Grammar School Collective Agreement 2021;
- Ipswich Grammar School Student Protection Policy;
- Ipswich Grammar School Workplace Health and Safety Policy;
- Ipswich Grammar School Privacy Policy;
- Ipswich Grammar School Risk Management Procedure; and
- Ipswich Grammar School Incident Report Form.

## **Section 6 - Definitions**

For the purposes of this Policy, the following definitions apply:

Amendments	All changes made to the policy document or applicable legislation from time to time
Complaint	A statement that something is unsatisfactory or unacceptable, a reason for
	dissatisfaction, or an expression of dissatisfaction
Complainant	A person that makes a complaint
Dispute and Grievance	The Dispute and Grievance Resolution Procedure as listed in clause 1.10 of the Ipswich
Resolution Procedure	Grammar School Collective Agreement 2021
Incident	An incident is defined as: any occurrence that has resulted in or has the potential to result in, adverse consequences to people, the environment, community, property, reputation or a combination of these. A significant deviation from agreed operating procedures is also classed as an 'incident'. Ongoing conditions that have the potential to result in adverse consequences are considered incidents
Respondent	A person who responds or replies to a complaint
Student Protection	The Ipswich Grammar School Student Protection Policy
Policy	
The School	The School refers to Ipswich Grammar School

## **Section 7 – Document Information**

A complete list of the documents' metadata including author information, and approval and review dates is recorded in SharePoint. A summary of the current change is provided in the table below:

Version	Details of Change
1.0	New policy
2.0	Updated policy template and document review.

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# Schedule 1 – Framework for The School's Complaints Resolution Procedure

#### **Framework**

The School's framework for dealing with complaints involves a three-step process, namely:

- Stage 1 A concern is raised with the School.
- **Stage 2** A formal written complaint is made to the Headmaster.
- Stage 3 A review by the Chair of the Board of Trustees is requested.

Further details about these Stages are set out in **Schedule 1**.

Common considerations when the School is managing complaints are set out in Schedule 2.

## **Recommendations for Initially Raising Concerns (Stage 1)**

At first instance, you should raise your concerns directly with the School. The School must be aware of a concern and of its substance in order to address it.

The School believes that a concern is often best resolved closest to its source, and encourages concerns to be raised directly with the person in the first instance. For example, when a concern relates to a student, the concern should be raised with the relevant classroom teacher.

However, depending on the nature and severity of an issue, and whether the person the complaint is about (ie a classroom teacher or an employee's direct supervisor) has a conflict of interest or the concern relates to their conduct, concerns may instead be raised directly with a senior staff member (eg a Head of Year, member of the Senior Leadership Team or Human Resources Manager).

For guidance on who to contact at first instance, refer below.

Nature of Complaint	Student Matters Designated staff member	
	Prep to Year 6	Years 7 to 12
Student-related matters	Head of Junior School	Head of Year
Enrolment related matters	Head of Junior School	Dean of Students
Student wellbeing matters	Deputy Head of Junior School	Head of Year
Curriculum matters and teaching matters	Junior School Curriculum	Head of Department or Dean
	Leader	of Academics
Staff related matters	Head of Junior School	Head of Department or Dean
		of Academics
Business operations or finance matters		
Headmaster or a member of the Board		
Business operations or finance matters		Business Manager
Headmaster or a member of the Board		Board of Trustees
Nature of Complaint	Staff Matters	
	Designated staff member	
	Prep to Year 6	Years 7 to 12
Employment, conduct or performance matters	Human Resources Manager	Human Resources Manager

A student can directly raise concerns with their classroom teacher or the relevant Head of Department or Head of Year, Dean of Academics or Dean of Students.

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The following considerations are relevant prior to, and when, raising a concern:

- Clearly identify the issue or problem prior to contacting the School;
- Decide whether the issue or problem is in the nature of a complaint, concern, enquiry or suggestion. This will help in finding a solution;
- Identify the party or parties involved;
- Consider the practical outcome you are trying to achieve (while being realistic and open to other outcomes and solutions);
- If there is more than one issue or problem, write a list so that you are adequately prepared and then decide which issue or problem matters most to you;
- Consider whether there are any interim measures you would like the School to consider whilst it
  makes enquiries about the issue or problem;
- Make an appointment to meet with the relevant staff member to discuss the concern;
- For parents the best way to do this is to contact Reception to arrange a mutually convenient time for a telephone call or meeting. When contacting Reception, please identify yourself and the student concerned, the subject of your concern, identify the person you would like to speak with, and provide a brief description of the issue you wish to speak about (for example 'homework', 'enrolment decision (including appeals)', 'wellbeing' or 'grounds maintenance');
- For employees, the best way to do this is to email the Human Resources Manager to arrange a mutually convenient time for meeting. When contacting Human Resources, please briefly explain the subject of your concern, and provide a brief description of the issue you wish to speak about; and
- Remain courteous and calm when conveying your concerns. The School is within its rights to terminate a conversation with the person raising the concern until such time that a courteous and calm conversation can continue.

# Schedule 2- Further details about the School's Complaints Resolution Procedure

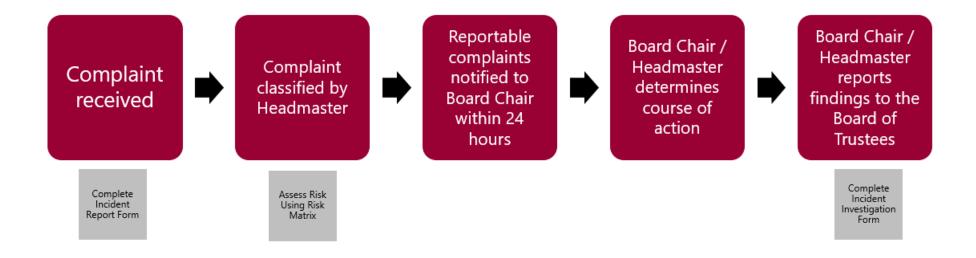
Stage 1:	Stage 1: Raise the concern		
Step 1	Identify the concern	Clarify your concern: "who, what, when, where, why, and how".  Identify the outcome you are trying to achieve by raising your concern.	
Step 2	Raise the concern	The School believes that a concern is often best resolved closest to its source and encourages concerns to be raised directly with the person in the first instance.	
		Depending on the nature and severity of an issue, and whether the person may have a conflict of interest, concerns may instead be raised directly with a senior staff member (e.g. a Head of Department, Head of Year, member of the Senior Leadership Team or Human Resources Manager). However, that senior staff member may decide to delegate responsibility for dealing with the concern to another appropriate staff member (e.g. the relevant Head of Year).	
Step 3	Acknowledgement	Once a concern is raised, the School will record (either by way of an electronic file note or written correspondence) the details of the concern including your name and contact details.	
		The School's focus will be on understanding the nature of the problem, the party or parties involved, and the nature of any agreeable solutions.	
Step 4	Outcome	Where an agreeable solution is available, this will usually be communicated in writing to you (being usually within five (5) business days of the outcome being reached).	
		Where a mutually agreed outcome between the School and the person raising the concern is not appropriate, or possible, the staff member handling the concern will make a decision that best aligns with the School's procedures and legal obligations. This decision will be communicated in writing to you (being usually within five (5) business days of the outcome being reached), and the communication will be kept on the relevant student's (and if applicable, staff member's) file.	

Stage 2: I	Make a complaint	
Step 1	Make a complaint	If you are not satisfied with the way your concern has been handled, you may choose to make a formal written complaint. Complaints should ordinarily be made within one (1) calendar month of the initial concern first being raised with the School.
		A formal complaint should at first instance be addressed to Headmaster. If the complaint concerns the Headmaster, the complaint should be made to the Board Chair (see Stage 3), in which case the Board Chair will manage the process outlined below.
		If a formal complaint is about the Board Chair, the complaint should be made to the Deputy Board Chair, who will manage the process outlined below.
		You may lodge a formal written complaint to the Headmaster at <a href="mailto:headmasterpa@ipswichgrammar.com">headmasterpa@ipswichgrammar.com</a>
		You may also telephone Reception on (07) 3813 9600 to arrange a meeting. Please note that if phoning to arrange a meeting, Reception staff will take your details and endeavour to confirm a meeting time as soon as it is practicable to do so.
Step 2	Acknowledge receipt	The Headmaster will acknowledge receipt of the formal written complaint as soon as practicable (being usually within five (5) business days).
Step 3	Review of complaint	When dealing with a formal written complaint, the School's objective is to achieve a resolution by:
		<ul> <li>Clarifying the substance of the complaint, and the steps taken by the School to address the initial concern;</li> <li>Identifying whether the complaint raises an issue regarding non-compliance with the School's procedures;</li> <li>Identifying whether the complaint raises an issue that would be more appropriately addressed under the School's Student Protection Policy;</li> <li>Communicating with you and relevant parent(s), student(s) and or staff, in an attempt to resolve the issue by agreement (where practicable); and</li> <li>Failing agreement, investigating the complaint and deciding appropriate outcomes in accordance with procedural fairness and natural justice principles.</li> </ul>
		The Headmaster may delegate parts of the complaint-management process, and seek the assistance of third parties, however any ultimate decision will still be made by the Headmaster.
		If the Headmaster or delegate arranges to speak with you, you may request to have someone else present as a support person. The support person can be a relative or a friend, but please note that the role of a support person is to provide you with support and not to act as an advocate.
Step 4	Outcome	The Headmaster or delegate will aim to communicate the outcome of a formal written complaint in writing within fifteen (15) business days where practicable.  The Headmaster will promptly report any formal written complaints, and relevant outcomes, to the Board of Trustees. This is part of the cyclical review and risk management process at the School.

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Stage	3 – Request a R	Review
Step 1	Request a review by the Board Chair	If you are not satisfied that your formal written complaint has been adequately resolved by the Headmaster, you may request a review by writing to the Board Chair via email at <a href="mailto:dedwards@ipswichgrammar.com">dedwards@ipswichgrammar.com</a> or by post at: via post:
		The Board Chair Ipswich Grammar School Darling Street, Ipswich, Queensland 4305 Locked Bag 6300, North Ipswich, Queensland 4305
		Members of the School community who raise complaints with other members of the Board of Trustees will be directed to follow the procedures set out in this policy (eg raising a complaint with the Headmaster or requesting a review by writing to the Board Chair).
		Requests for review must be made in writing within ten (10) business days of the date the Headmaster communicated the outcome of your complaint in writing. The grounds for the review, and in particular any concerns you have with the way the relevant complaint was dealt with, must be clearly identified in the request for review.
Step 2	Review	Please note that in accordance with good governance, the Board entrusts the Headmaster with the day-to-day management of the School, and in particular its staff and students. The Headmaster is accorded significant discretion regarding such matters.
		Accordingly, any review of the Headmaster's decision under this policy will be confined to the Board Chair deciding whether there is evidence that the School's procedures have not been followed, in a way likely to have meaningfully influenced the Headmaster's decision, or that the Headmaster unreasonably exercised his or her discretion.
		The Board Chair may delegate parts of the review, or seek the assistance of third parties (such as Independent Schools Queensland), however any ultimate decision will still be made by the Board Chair.
		For the avoidance of doubt, the Board Chair will not delegate to the Headmaster a review of a decision they have already made. However, if the Board Chair is satisfied that a complaint has not been properly raised (or dealt) with by the Headmaster (and the Headmaster does not otherwise have a conflict of interest), the Board Chair may refer the matter to the Headmaster to make an initial decision (noting that decision would then create a right to request a review).
Step 6	Outcome	The Board Chair will aim to communicate the outcome of a request for review in writing within forty-five (45) business days where practicable. Wherever possible, reportable complaints will be resolved within a board cycle of the report being received.
		The Board Chair will promptly report any requests for review, and relevant outcomes, to the Board.

# **Board of Trustees - Complaints Handling Procedure**



## Schedule 3 - Relevant Considerations

## **Complaints**

#### What is a Complaint?

Ipswich Grammar School applies the following definition to a complaint:

- A statement that something is unsatisfactory or unacceptable, a reason for dissatisfaction, or an expression of dissatisfaction.
- A complaint may stem from an incident. An incident is defined as: any occurrence that has resulted in or has the potential to result in, adverse consequences to people, the environment, community, property, reputation or a combination of these. A significant deviation from agreed operating procedures is also classed as an 'incident'. Ongoing conditions that have the potential to result in adverse consequences are considered incidents.

#### Withdrawal of a Complaint

A complaint can be withdrawn at any stage during the processes outlined in this policy. A complaint can only be withdrawn by the person who made the complaint to the School.

Ideally, all complaints should be retracted in writing, however a dated notation on the School's systems, stating the complaint has been withdrawn verbally by the appropriate person can be made by a staff member at the School responsible for managing the complaint.

The School will notify affected parties if a complaint is withdrawn, where considered appropriate.

Regardless of a person's wish to withdraw a complaint, complaints that have disciplinary implications for a member of staff may still be followed up by the School.

#### **Recording Complaints**

Complaints received by the School will be retained in nominated directories within One-Note and TASS. As appropriate to the complaint, the following shall be available:

- Date of complaint;
- Name of complainant;
- Recipient of complaint;
- Statement of complaint;
- Description of how the complaint was handled / resolved; and
- Date closed.

Formal complaints are recorded on the Reportable Incident Dashboard for the Board of Trustees to see the incidents, types, number occurring per month and risk classification, based on the School's Risk Matrix.

#### **Anonymous Complaints**

The School is committed to dealing with complaints in accordance with the processes outlined in this policy. The School respects in some cases, complainants would prefer to remain anonymous and not put a name to their complaints.

The School treats complaints about the School, a staff member, a student's education, enrolment and/or a student's wellbeing with the utmost importance, and will investigate such complaints raised to the fullest extent practicable. However, anonymity can make it difficult for the School to effectively resolve complaints (particularly where the School is being asked to accept an anonymous source's version of events) and are accordingly discouraged.

#### **Previously Addressed, Stale or Vexatious Complaints**

Complaints that have been previously addressed by the School or externally, or which were not raised with the School within a reasonable period of time (having regard to the nature of the relevant complaint), will not be considered in the absence of highly relevant new information and/or evidence coming to light.

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The School does not tolerate vexatious complaints.

#### **External Complaints and Redress**

The School acknowledges that complaints relating to the School can also be made to an external body or be the subject of legal action. However, the School encourages its community to raise any complaints, and work to resolve such matters, in accordance with the procedures outlined in this policy.

#### Confidentiality

Appropriate confidentiality will be maintained by the School at all times when dealing with a complaint, with information only being provided to those who have a right or need to know.

#### Communication

This policy is available to parents, students and the School community via the School's website. This Policy will be available to staff via the School's Document Management System (DMS). This policy (or aspects thereof) will also feature in communications to employees and parents via Schoolbox, Parent Lounge, and School newsletters as required.