



# Complaints Handling Policy

# Complaints Handling Policy

<b>Purpose:</b>	The purpose of this policy is to provide written processes about receiving, assessing, investigating and otherwise dealing with complaints. <sup>1</sup>	
<b>Scope:</b>	Any person directly affected by the subject of a complaint. Examples may include staff, students or a student's parent or guardian, contractors, or community members.	
<b>Supersedes:</b>	Complaints Handling Policy – 2 <sup>nd</sup> May 2024	
<b>Status:</b>	Approved	<b>Date of Authorisation:</b> 4 <sup>th</sup> September 2025
<b>Authorised by:</b>	Townsville Christian College Limited Board of Directors	
<b>References:</b>	<ul style="list-style-type: none"> <li>• <a href="#"><i>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</i></a></li> <li>• <a href="#"><i>Fair Work Act 2009 (Cth)</i></a></li> <li>• <a href="#"><i>Work Health and Safety Act 2011 (Qld)</i></a></li> <li>• <a href="#"><i>Privacy Act 1988 (Cth)</i></a></li> <li>• <a href="#"><i>Anti-Discrimination Act 1991 (Qld)</i></a></li> <li>• <a href="#"><i>Australian Human Rights Commission Act 1986 (Cth)</i></a></li> <li>• <a href="#"><i>Sex Discrimination Act 1984 (Cth)</i></a></li> <li>• <a href="#"><i>Age Discrimination Act 2004 (Cth)</i></a></li> <li>• <a href="#"><i>Disability Discrimination Act 1992 (Cth)</i></a></li> <li>• <a href="#"><i>Racial Discrimination Act 1975 (Cth)</i></a></li> <li>• <a href="#"><i>Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2022, NEQ)</i></a></li> <li>• Townsville Christian College Enrolment Form</li> <li>• Townsville Christian College Child Protection Policy</li> <li>• Townsville Christian College Work Health and Safety Policy</li> <li>• Townsville Christian College Disability Discrimination Policy</li> <li>• Townsville Christian College Privacy Policy</li> <li>• Townsville Christian College Anti Bullying Policy</li> <li>• Townsville Christian College Student Behaviour Management Policy</li> <li>• Townsville Christian College Staff Code of Conduct</li> </ul>	
<b>Review Date:</b>	Annually	<b>Next Review Date:</b> September 2026
<b>Policy Owner:</b>	Townsville Christian College Limited Board of Directors	

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<sup>1</sup> [Education \(Accreditation of Non-State Schools\) Regulations 2017, s.7](#)

### Version control and document history

Date	Summary of modifications made	Version
4 <sup>th</sup> September 2025	<ul style="list-style-type: none"> <li>• Wording change</li> <li>• Updates to procedures</li> </ul>	4 <sup>th</sup> September 2025
2 <sup>nd</sup> May 2024	<ul style="list-style-type: none"> <li>• Major update to bring in line with the current ISQ Policy</li> </ul>	2 <sup>nd</sup> May 2024
16 <sup>th</sup> May 2023	<ul style="list-style-type: none"> <li>• Minor wording change</li> </ul>	16 <sup>th</sup> May 2023
1 <sup>st</sup> December 2021	<ul style="list-style-type: none"> <li>• Addition of accessibility</li> <li>• Addition of avenues for review beyond the Principal (Step 5 in the Procedure)</li> </ul>	1 <sup>st</sup> December 2021
7 <sup>th</sup> October	<ul style="list-style-type: none"> <li>• Minor wording change</li> </ul>	7 <sup>th</sup> October 2021
1 <sup>st</sup> June 2021	<ul style="list-style-type: none"> <li>• Addition of Appendix 1</li> </ul>	1 <sup>st</sup> June 2021

## Policy Statement

Townsville Christian College acknowledges the right of students, parents/guardians, staff and others to complain when dissatisfied with the college's services, including an action, inaction or decision of the college. The college encourages constructive criticism and complaints. Townsville Christian College is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way.

Townsville Christian College will ensure employees can recognise, receive, and appropriately refer complaints to the informal or formal complaints procedure.

Townsville Christian College recognises that time spent on handling complaints can be an investment in better service to students and parents/guardians and a better culture for employees, and views complaints as part of an important feedback and accountability process.

## Definitions

<b>Complaint</b>	An expression of dissatisfaction made to or about the college, related to the college's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. <sup>2</sup>
<b>Informal Complaint</b>	A complaint about a matter that is likely to be simple, straight forward, easily manageable, or minor, where a simple or quick resolution is appropriate such as discussion of the matter with a relevant staff member.
<b>Formal Complaint</b>	A complaint about a matter that is serious, complex or may pose a threat to the health and safety of any person. Examples include serious allegations or breaches of policy, complaints against a senior staff member, including the Principal or an informal complaint that could not be resolved informally. Assessment of the complaint is required by the Principal or delegate, or College Board if the complaint is about the Principal.
<b>Complainant</b>	The person, organisation or their representative making a complaint. <sup>3</sup>
<b>Respondent</b>	The person who is referred to in a complaint by a complainant as the person responsible for their concerns or who can best respond to their concern.

## Complaints Handling Principles

Townsville Christian College will manage complaints according to the following (which include principles of procedural fairness):

- complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe
- complaints should be resolved with as little formality and disruption as possible, having regard to the nature of the complaint
- interested parties to the complaint (for example, the complaint and any respondent) will be heard and/or may provide relevant information in relation to the complaint

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<sup>2</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

<sup>3</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.2

- confidentiality and privacy will be maintained as much as possible
- the complainant and any respondent will be offered support as appropriate
- victimising behaviour towards a complainant, respondent or other people associated with the complaint, will not be tolerated
- complainants that lodge a complaint on reasonable grounds will not suffer any other reprisals on the basis of the lodging the complaint

### **Complaints that may be Resolved under this Policy**

Townsville Christian College encourages anyone who feels impacted by an issue involving the college to file a complaint. Complaints can address matters such as:

- the college, its employees or students having done something wrong
- the college, its employees or students having failed to do something they should have done
- the college, its employees or students having acted unfairly or impolitely
- issues of student or employee behaviour that are contrary to the relevant behaviour management policy or code of conduct, including inappropriate staff conduct as reported by a student.<sup>4</sup>
- issues related to learning programs, assessment and reporting of student learning
- issues related to communication with students or parents or between employees
- issues related to college fees and payments
- general administrative issues
- issues relating to non-compliance with a process outlined in college policies or procedures, for example the child protection policy, discrimination policy, or privacy policy.<sup>5</sup>

Student complaints may be brought by students or by parents on behalf of their children, as appropriate in the circumstances.

### **Issues Outside this Policy**

The following matters are outside the scope of this policy and should be managed as follows:

- Child protection concerns including allegations of sexual abuse, likely sexual abuse or harm to children should be dealt in accordance with the college's Child Protection Policy.
- Student bullying complaints should be dealt with under the Anti-Bullying Policy or Student Behaviour Management Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the Student Behaviour Management Policy.
- Student or employee violence or criminal matters should be directed to the Principal who will involve the Police as appropriate.
- Disputes relating to a staff member's employment should be directed to the Business Manager and dealt with under employment law. This does not include disputes about work health and safety matters, which may be dealt with under the college's Complaints Handling Policy.
- Disputes between board members, between company members and board members or between company members should be dealt with in accordance with the Constitution.
- Formal legal proceedings should be managed as appropriate in the circumstances.

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<sup>4</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

<sup>5</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

# Responsibilities

## College

The college has the following roles and responsibilities:

- develop, implement, promote and act in accordance with the college's Complaints Handling Policy
- appropriately communicate the college's Complaints Handling Policy to students, parents and employees
- ensure that the Complaints Handling Policy are readily accessible by staff, students and parents
- upon receipt of a complaint, manage the complaint in accordance with the Complaints Handling Policy
- ensure that appropriate support is made available 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 employees
- keep records
- conduct a review/audit of the Complaints Register in regular intervals
- report to the college's insurer when that is relevant
- refer to the college's governing body immediately any claim for legal redress.

## All Parties to a Dispute

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

- comply with the college's Complaints Handling Policy
- provide complete and factual information in a timely manner
- not provide deliberately false or misleading information
- not make frivolous or vexatious complaints or retaliatory complaints
- act in good faith and maintain a mutually beneficial relationship of trust and cooperation
- act in a calm, courteous manner and non-threatening manner
- 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
- not victimise or act in reprisal against any party to the dispute or any person associated with them.

## Employees Receiving and/or Managing Complaints

Employees receiving and/or managing complaints have the following roles and responsibilities:

- act in accordance with the college's Complaints Handling Policy
- refer the complainant to the college's Complaints Handling Policy and provide additional information as necessary
- maintain confidentiality as far as possible
- keep appropriate records

- forward complaints to more senior employees, including the Principal, if the complaint cannot be resolved at the initial level or if it involves serious issues that require the involvement of more senior employees
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

## **Implementation**

Townsville Christian College is committed to raising awareness of the process for resolving complaints at the college, including by the development and implementation of this policy and via the clear support and promotion of the policy. The policy is available on our website, on the administration drive and Workhub platform.

Townsville Christian College is also committed to regular training of employees on the implementation of this policy. The college will inform staff of its processes relating to complaints during inductions, and annually thereafter.

## **Complaint Register**

Townsville Christian College will maintain a complaint register with details such as the date, source and description of complaints, the employee managing the complaint, the actions taken, outcome and the date the complaint was closed.

The complaint register will be stored securely.

All complaints shall be entered onto the complaint register as soon as practicable after the complaint is received. The complaint register will not contain complaints about the Principal. Records of complaints about the Principal will be maintained by the Board with access restricted to the Board.

To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire complaint register will be limited to the Principal, Business Manager, WHS Manager and Office Manager.

The Principal may authorise the sharing of specific, relevant entries from the complaint register with other designated staff members (such as the senior leadership team), provided measures are taken to protect the confidentiality of all parties involved, particularly ensuring that respondents to a complaint do not gain inappropriate access to information about the allegations against them.

## **Complaint Handling Procedure**

### **1. Lodging a Complaint**

- a) Complaints can be lodged through various methods, including
  - i. Phone
  - ii. Email
  - iii. In-person (by appointment)
  - iv. Complaint Form (available at the College Administration Office)
- b) If the complainant is unsure where to direct their complaint, they can contact the College's administration office for guidance
- c) Complaints about the Principal must be lodged with the Board – [secretary@tsvcc.qld.edu.au](mailto:secretary@tsvcc.qld.edu.au)
- d) Where an anonymous complaint is lodged, the college will follow the complaints handling policy, when there is sufficient information to do so.

### **2. Acknowledgement, Assessment and Referral**

- a) All complaints and any documentation will be forwarded to the Principal
- b) The Principal will decide how to best manage, assess and investigate the complaint
- c) At any point in time the Principal can delegate a Staff Member to assist
- d) Acknowledgement of the complaint will be forwarded to the complainant in writing

### **3. Registration and Support**

- a) The complaint will be promptly entered it onto the complaints register
- b) The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.
- c) If a student is a complainant, respondent or victim, or the child of a complainant, respondent or victim of a matter being managed through this policy, the school may offer the student support where appropriate e.g. discussing suitable adjustments with parents/caregivers.

### **4. Informal Complaints Handling Process**

- a) The informal process is designed to resolve issues promptly and collaboratively
- b) It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s)
- c) If the complaint cannot be resolved informally, it will be escalated to the formal process.

### **5. Formal Complaints Handling Process**

- a) The formal process begins with the assessment of the complaint by Principal or delegate (e.g., a member of the senior leadership team or the Board Chair for complaints against the Principal)
- b) The Principal or delegate may gather additional information through investigation, interviews, or evidence review
- c) The Principal will determine appropriate action, which may include:
  - i. Mediation
  - ii. Disciplinary measures
  - iii. Mentoring
  - iv. Re-training
  - v. Implementation of policy changes
  - vi. Referral to external agencies (e.g., police)
  - vii. Provision of written updates to the complainant throughout the process



viii. Other actions the Principal determines as appropriate in the circumstances.

## **6. Complaint Closure**

- a) The Principal or delegate will finalise the investigation and inform the relevant parties of the outcome
- b) The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome
- c) The Principal will provide a report to the Board including the date, summary and outcome of complaint

## **7. Appeals Process**

- a) Complainants may appeal the outcome of a complaint by writing to:
  - i. the Principal (for complaints not previously managed by the principal,)
  - ii. the Board Chair (for complaints previously managed by the Principal, or complaints about the Principal).