



Executive Summary

Our Commitment to Complaints Handling

Our ability to identify, manage and promptly resolve complaints, received from parents/carers, students, former students, former students' parents/carers and other key stakeholders, is an important aspect of a College's management practices.

St Mary's College's Leadership Team is committed to handling complaints effectively and efficiently. This commitment is demonstrated through:

- the establishment, implementation and maintenance of this Program
- the appointment of a Complaints Manager to oversee this Program
- the appointment and training of senior staff to act as Complaints Officers
- training of all staff and representatives about our complaints handling procedures
- the appointment and training of Complaints Officers and a Complaints Manager at the EREA level
- ensuring our complaints handling procedures are accessible to all parents/carers and other external parties
- the establishment of our online complaints management system, CompliSpace Assurance
- regular analysis of complaints received, and the implementation of rectification action where deficiencies in our internal systems and procedures are identified.

Our Complaints Handling Program includes:

- [What is a "Complaint"?](#)
- [Guiding Principles for Handling Complaints](#)
- [Why is it Important to Manage Complaints Properly?](#)
- [How Do We Encourage Feedback? \(Transparency and Accessibility\).](#)

- [Who Manages Complaints at St Mary's College?](#)
- [How St Mary's College Handles Complaints](#)
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- [Procedural Fairness in Complaints Handling](#)
- [Processes for Review of a Complaint's Resolution](#)
- [Complaints Manager Administration](#)
- [Complaints Handling Documents](#)

What is a “Complaint”?

We have adopted the definition of "complaint" from the Australian complaints handling standard (AS/NZS 10002:2014) which defines a complaint as an:

“expression of dissatisfaction made to or about an organisation, related to its products, services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.”

The term “complaint” is used to refer collectively to any enquiry, comment, complaint or dispute raised by a person expressing dissatisfaction as to a particular circumstance, or situation, related to our services or operations.

A “person” includes students, parents/carers, former students, parents/carers of former students, members of the wider College community, strategic partners, regulators, and can even extend to competitors and members of the public generally. A person may be a natural person, an organisation, or a representative of an organisation.

When is a complaint a “complaint”?

It is often difficult to establish when constructive feedback becomes a complaint. If you are in doubt as to whether a complaint is being made, you should attempt to clarify the situation as follows:

Ask yourself: “Does this feedback highlight a gap or deficiency in our service, operations and or procedures?”

If the answer is “Yes” you should log the feedback as a complaint, even though on its face, it may be considered more generally as constructive feedback.

For example:

A parent contacting the College and “complaining” that their child was not included in a sporting team, or not made a prefect, or did not get an “A” on a homework task, is not in itself a complaint as the particular incident does not suggest that the College could improve its service delivery or operations.

On the other hand, if the matter raised relates to alleged bias in selection or assessment criteria this would be classified as a complaint as the allegation of bias would need to be investigated, and, if substantiated, would reflect an area where the College could improve its service delivery or operations.

Frontline Complaints and Formal Complaints

Complaints can be generally classified as either frontline complaints or formal complaints.

A Frontline Complaint is a complaint that can be resolved either at the time the complaint is made and received, or very shortly after it's received. The majority of complaints are frontline complaints – addressed by frontline or first point of contact staff.

A Formal Complaint is a complaint that requires further investigation and/or a written acknowledgement and response.

Staff complaints are not “complaints” for the purpose of this Program

Internal suggestions and complaints received from staff are not managed through this Program.

Internal complaints about students are not “complaints” for the purpose of this Program

Internal complaints received with respect to student behaviour, such as bullying or aggressive behaviour, are not managed through this Program.

Child Safety and Safeguarding-Related Complaints

A child safeguarding-related complaint can be made by anyone including a student, former student, parent/carer, other family member, staff member, Volunteer, Contractor or member of the wider community.

A child safeguarding-related complaint therefore includes any disclosure, allegation, suspicion, concern or internal report of:

- a breach of the College’s Child Safeguarding Code of Conduct (Vic)
- a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the College or a College event
- child safety incidents or concerns Involving College Staff, Volunteers or Contractors
- other staff misconduct (such as a procedural breach of the Child Safety and Safeguarding Program).

For the purposes of this policy, we call these “Child Safety and Safeguarding-Related Complaints”.

A child safeguarding-related complaint also includes any complaint about the College’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with our procedures for responding to and reporting child safety incidents or concerns.

Child safeguarding-related complaints are managed through our [Child Safety and Safeguarding Complaints Management](#) policy and procedures in our Child Safety and Safeguarding Program.

As a Registered Training Organisation (RTO), the College is required to implement a transparent complaints and appeals policy to ensure that all complaints and appeals are recorded, acknowledged and dealt with fairly, efficiently and effectively (Standards for Registered Training Organisations (RTOs) 2015, Standard 6).

Guiding Principles for Handling Complaints

To manage complaints effectively, we have established a Complaints Handling Program in line with both the international complaints handling standard (ISO 10002:2018), and the Australian complaints handling standard (AS/NZS 10002:2014) (collectively referred to as the Complaints Handling Standards).

When managing a complaint or an appeal, the College always aims to apply the following Guiding Principles as set out in the international complaints handling standard (ISO 10002:2018), and aspires to the values enshrined in [The Charter for Catholic Schools in the Edmund Rice Tradition](#).

These principles are mirrored in the Australian complaints handling standard (AS/NZS 10002:2014) in more detail, however, in the interests of ensuring that complaints handling at the College is as simple and efficient as possible, the College uses the (ISO 10002:2018) Guiding Principles.

Commitment	We are actively committed to defining and implementing a complaints handling process.
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Capacity	We make sufficient resources available for, and are committed to, complaints handling, and we manage those resources effectively and efficiently.
Transparency	Our complaints handling process is communicated to staff, volunteers and contractors, the College community and other relevant interested parties. We provide individual complainants with adequate information about the handling of their complaint.
Accessibility	We aim to make the complaints handling process simple and easily accessible to all. We make information available in relation to the details of making and resolving complaints and all complaints handling information is easy to understand and use.
Responsiveness	We address the needs and expectations of potential complainants with respect to complaints handling.
Objectivity	We address each complaint, on its merits, in an equitable, objective, and unbiased manner through our complaints handling process.
Charges	Access to our complaints handling process is free of charge to the complainant.
Information Integrity	We ensure that the information about our complaints handling process is accurate and not misleading, and that data collected is relevant, correct, complete, meaningful and useful.
Confidentiality	Personally identifiable information about complainants is only made available for the purpose of addressing the complaint within the College and, unless the complainant consents, actively protected from disclosure.
Complainant Focused Approach	We aim to put ourselves in the shoes of the complainant and understand the complaint from their point of view. We adopt a complainant-focused approach with respect to handling complaints and are open to feedback on our complaints handling process.
Accountability	We have established, and maintain, accountability for, and reports on, the College's decisions and actions with respect to complaints handling.
Improvement	One of the College's permanent objectives is the increased effectiveness and efficiency of our complaints handling process.

Competence	Our staff have the personal attributes, skills, training, education and experience necessary to handle complaints.
Timelines	The College handles complaints as quickly as possible given the nature of the complaint and the process used.
Respectful	Complaints are resolved in a manner that is respectful of the complainant and the person against whom the complaint is made.
Restorative	When dealing with a complaint, we aim to restore relationships which may have broken down.

Why is it Important to Manage Complaints Properly?

We Have an Obligation to Manage Complaints

The legislative and regulatory obligation to provide effective complaints handling stems from a number of sources.

The Guidelines to the Minimum Standards for Schools Registration and Other State and Federal Requirements for Victorian Catholic Schools require that the College has policies with respect to managing complaints, as evidence of compliance with Minimum Standard 4 – Care, Safety and Welfare of Students (schedule 4, clause 12 of the Education and Training Reform Regulations 2017).

Standard 10 of the ESOS National Code outlines detailed systems that schools must have in place relating to the implementation of complaints and appeals processes for overseas students.

As a Registered Training Organisation (RTO), the College is required to implement a transparent complaints and appeals policy to ensure that all complaints and appeals are recorded, acknowledged and dealt with fairly, efficiently and effectively (Standards for Registered Training Organisations (RTOs) 2015, Standard 6).

Why Do We Want to Know About Complaints?

Encouraging feedback from parties external to St Mary's College including complaints from parents/carers, parents/carers of former students, or members of the wider College community, can offer opportunities to improve our service levels and operations.

Complaints are a common indicator of low customer satisfaction, but their absence does not necessarily imply high customer satisfaction.

Research has found that more than 90 per cent of dissatisfied customers will not make a complaint. However, this does not mean that they won't share their experience with others. Therefore, when we resolve an individual complaint, we can significantly improve our general level of key stakeholder satisfaction.

Encouraging complaints, and having an effective system to receive and manage them:

- encourages constructive feedback
- enhances our ability to capture and resolve complaints in a consistent, systematic and responsive manner
- enhances our ability to identify systemic and recurring problems and to continually improve our internal systems and controls
- assists us to develop a customer-focused approach to resolving complaints and assists staff to improve their skills in working with parents/carers as well as other external parties
- ensures that we comply with our legal and regulatory obligations
- assists staff in dealing with difficult and/or aggressive people.

The increased growth and speed of communications through social media make it more important than ever that we capture complaints early and manage them effectively. Our reputation is one of our greatest assets, and our ability to effectively manage complaints relates directly to our ability to maintain our reputation.

How Do We Encourage Feedback? (Transparency and Accessibility)

It is important that information about how to complain is made publicly available.

The College has implemented the following steps to encourage feedback, and to make it easy for people to lodge a complaint.

- EREA has developed a [Complaints Handling Policy](#), which applies to all EREA-governed schools, including St Mary's College. The EREA Complaints Handling Policy is available on our public website.
- All staff are made aware of the importance of capturing and recording critical feedback. Many complaints are received via telephone, in person, or via email, and the ability of our staff to recognise a complaint, and to capture it effectively, is a central feature of our Complaints Handling Program.

- We have developed a [Complaints Handling Guide](#), which includes details of how to make a complaint. This plain English guide is provided to complainants to assist them during the complaints resolution process.
- Complaints or disputes do not need to be in writing. Insisting that complaints are in writing can be a disincentive for the complainant.
- Where we identify that a complainant has limited literacy skills, we give them help in expressing their complaint or dispute more clearly.
- Where complainants have special needs, the availability of interpreters and staff who are cross-culturally trained or trained to cater for special needs are provided.

We also encourage feedback from all members of the College by providing the option to make an anonymous complaint, or make a complaint using a pseudonym, in accordance with [Australian Privacy Principle 2](#).

Who Manages Complaints at St Mary's College?

Our Complaints Manager

We have appointed a Complaints Manager who's responsible for:

- ensuring that all staff are educated about our Complaints Handling Program
- investigating and, where necessary, escalating complaints when requested by the complainant
- where necessary, escalating complaints to the appropriate EREA Complaints Officer
- liaising with complainants and Complaints Officers
- maintaining accurate records in the Complaints Register
- regularly reporting to the Leadership Team about complaints
- ensuring systemic complaints are identified and rectified
- monitoring the effectiveness of, and continually improving, our Complaints Handling Program.

Deputy Principal, Shaun Lancashire is our designated Complaints Manager.

Our Complaints Officers

We have appointed a number of key senior staff members to act as Complaints Officers. These individuals are authorised to investigate and manage Formal Complaints once they have been logged.

Complaints Officers are responsible for:

- investigating and, where necessary, escalating complaints to the Complaints Manager
- liaising with complainants
- maintaining accurate records in the Complaints Register.

Our Complaints Officers are:

Name	Position Title
Shaun Lancashire	Deputy Principal
Deanne Telford	Acting Business Manager

All Staff

Complaints may be received by any member of staff, at any time, either over the telephone, email, or during face-to-face meetings. So that complaints can be handled properly, it is important for all staff members to:

- be trained on our complaints handling processes, and, in particular, be familiar with our policies for [Receiving and Logging Complaints](#)
- be aware of their roles, responsibilities and authorities with respect to complaints
- be aware of what information to give to complainants
- report all complaints they receive
- treat complainants in a courteous manner
- demonstrate good interpersonal and communication skills.

All staff are authorised to deal with Frontline Complaints. Where a person makes a Formal Complaint, this must be referred to a Complaints Officer.

EREA Complaints Officers

The Regional Directors and Chair of Youth Plus have been appointed to act as EREA's Complaints Officers, for complaints in relation to EREA-governed schools and Flexible Learning Centres respectively.

These individuals are authorised to investigate and manage Formal Complaints once they have been logged with, or escalated to them.

The EREA Complaints Officers are responsible for:

- investigating and, where necessary, escalating complaints to the Deputy Executive Director of EREA
- liaising with complainants
- maintaining accurate records in the Complaints Register.

Who Manages Complaints?

Complaints at the College are handled as follows:

- against a student, parent or volunteer – the Principal or one of the College's Complaints Officers;
- against a teacher – the Principal or one of the College's Complaints Officers;
- against a member of the Executive Team – the Principal or the Complaints Manager;
- against the Principal or Deputy Principal – the relevant EREA Complaints Officer;
- against a member of the College EREA Victorian Schools Board - the Principal and the relevant EREA Complaints Officer, who will work with the Chair of the College EREA Victorian Schools Board;
- against the Chair of the College EREA Victorian Schools Board – the relevant EREA Complaints Officer.

Complaints Made Involving the Principal or Deputy Principal

If a complaint is made that involves the Principal or Deputy Principal, the complaint will be directed to the appropriate EREA Complaints Officer, who will deal with the matter in consultation with the EREA Deputy Executive Director.

How St Mary's College Handles Complaints

The 10 steps outlined in this section are intended to provide guidance about how to handle complaints generally.

[Section 1 – Receiving and Logging Complaints](#) is important for all staff

[Section 2 – Managing and Escalating Complaints](#) and [Section 3 – Recording and Reporting Complaints](#) are important for the College's Complaints Officers and the Complaints Manager.

Every incident will vary in degree of seriousness and not all the steps outlined below will be required to be undertaken in full in every circumstance. For example, when dealing with a Frontline Complaint (Step 1) it generally would not be necessary to send a written acknowledgement of the complaint to the complainant (Step 2).

Complaints must be addressed promptly in accordance with their nature and level of urgency. We aim to acknowledge receipt of a complaint immediately and seek to resolve all complaints internally within our pre-determined timeframes for resolution of complaints.

If we cannot resolve a complaint within these timeframes the complaint may become subject to external dispute resolution.

Receiving and Logging Complaints

This section is important for all staff at the College because any staff member can receive and log a complaint.

A Frontline Complaint is a complaint that can be resolved either at the time the complaint is made and received, or very shortly after it's received. The majority of complaints are frontline complaints – addressed by 'frontline' or first point of contact staff.

A Formal Complaint is a complaint that requires further investigation and/or a written acknowledgement and response.

All complaints should be addressed promptly and in accordance with their urgency. For example, significant health and safety issues should be processed immediately.

Complainants should be treated courteously and be kept informed of the progress of their complaint throughout the complaints handling process.

Logging a Complaint in CompliSpace Assurance

All complaints received (whether frontline or formal), must be logged through CompliSpace Assurance.

CompliSpace Assurance is designed to assist us in capturing all the information that is relevant, to allow the College to investigate and respond appropriately to a complaint.

Complaints logged through CompliSpace Assurance are automatically submitted to a Complaints Officer for screening and further action.

Step 1 - Dealing with Frontline Complaints

There are likely to be many occasions when someone makes a statement, or sends an email, that is an expression of dissatisfaction about some aspect of the College's service or operations that falls within the definition of a complaint, and a resolution can be quickly and easily achieved usually through verbal communications (i.e. no written response is required).

In many of these instances the person making the statement, or writing the email, may not even consider that they are making a "complaint". Often, they may simply be offering constructive feedback.

For example: A parent makes a complaint that their child's teacher kept the class in after school and the student missed the school bus.

This is clearly an expression of dissatisfaction about an aspect of the College's operations and therefore falls within the definition of a complaint.

It is also a relatively minor complaint that can be managed through a verbal acknowledgement and an explanation. In this circumstance, the parent would probably not expect to receive a formal written acknowledgement of their complaint, or for the matter to be escalated to a Complaints Officer.

This complaint may, on the surface, appear to be minor, however if the College was to receive 10 similar complaints from parents/carers, or parents/carers of former students, it would indicate a systemic issue which would require formal rectification action. It's for this reason that even minor complaints should be logged through CompliSpace Assurance.

When receiving verbal Frontline Complaints, it's important to apply the L.E.A.R.N.[™] Complaints Handling Technique.

Step 2 - Receiving and Logging Formal Complaints

Receiving a Formal Complaint

Formal complaints can be received in two ways:

- Verbal Complaint
- Written Complaint

A formal complaint is a complaint that requires further investigation and/or a written acknowledgement and response.

Formal complaints must be referred to a Complaints Officer. When a formal complaint is received a Complaints Officer must send a written acknowledgement of the complaint to the complainant.

In less serious instances, this written acknowledgement may be a relatively informal email communication. As the seriousness of the complaint increases, the formality of the communication should also increase.

When dealing with a more serious complaint that requires investigation and time to resolve, a more formal complaints acknowledgement communication should be forwarded to the complainant. Refer to our template [Complaint Response Letter](#).

A written acknowledgement should always be provided as soon as possible, and in any event within three business days of receipt of the complaint.

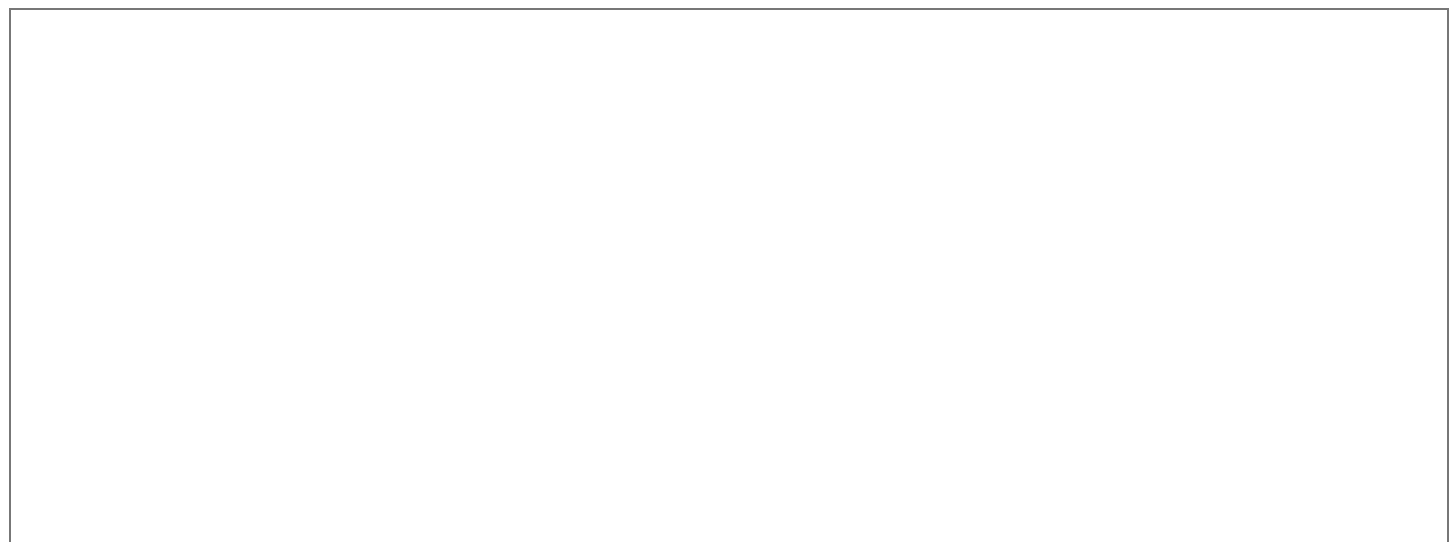
The nominated Complaints Officer should contact the complainant prior to the target resolution date, and keep in regular contact, advising of the status of the matter and each time confirming when the next communication should be expected.

Receiving and Acknowledging Verbal Complaints

Handling a verbal complaint efficiently requires patience and skill to avoid an initially negative situation becoming even more negative and escalating into a dispute.

Applying the L.E.A.R.N.™ Complaints Handling Technique ensures that all verbal complaints are effectively handled to minimise the likelihood of dispute.

Our Complaints Handling Program has been purposely designed to minimise the potential for complaints to escalate into disputes.



Applying the L.E.A.R.N.™ Complaints Handling Technique

When a verbal complaint is received, it is important to follow the L.E.A.R.N.™ Complaints Handling Technique.

The L.E.A.R.N.™ mnemonic is designed as a reminder that every complaint, whether frontline or formal, is an opportunity to learn, and find ways to improve the School's services and operations.

The infographic consists of five vertical grey rounded rectangles, each containing a large blue letter and a corresponding step of the L.E.A.R.N.™ technique. The steps are: Listen, Empathise, Acknowledge, Respond, and Notify. Each step includes a brief description of what to do and why it is important.

L
LISTEN
This is the first step in the complaints handling process. In face-to-face meetings, listening involves body language, as much as the ears. Allow the complainant to explain their position without being interrupted. Ask open-ended questions and focus on the details of the complaint, without thinking ahead to possible solutions or responses. If the complainant is agitated or aggressive, remain calm and level-headed.

E
EMPATHISE
Empathy is, at its simplest, awareness of the feelings and emotions of others. Put yourself in the shoes of the complainant. This is how you can attempt to understand what they are experiencing. Internally naming the emotions the complainant is feeling can help with this step. Showing empathy can help you to begin to resolve the situation.

A
ACKNOWLEDGE
It's important to acknowledge the complaint. You can do this by repeating the facts as you understand them. At this point you may acknowledge how the complainant may be feeling e.g. "that must have been very frustrating". In appropriate circumstances you may also offer an apology "I'm sorry for the inconvenience this has caused". If offering an apology, be careful not admit fault as this may lead to legal liability issues at a later time.

R
RESPOND
How you respond will very much depend on the circumstance of the complaint. Minor complaints may be dealt with immediately by providing an assurance that action will be taken. More significant complaints may require providing an overview of the school's complaints handling process and an undertaking to refer the matter on. At this stage you may ask the complainant what solution they would like to see.

N
NOTIFY
All complaints, including minor complaints, should be logged through CompliSpace Assurance. Keeping records of minor complaints can identify systemic issues. More serious complaints should be referred for action by a Complaints Officer.

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The L.E.A.R.N.™ mnemonic is used because the acronym itself is an important stage in the complaints handling process.

It acts as a 'meta mnemonic' to remind complaint handlers that every complaint, whether frontline or formal, is an opportunity to learn, and find ways to improve the College's services and operations.

Receiving and Acknowledging Written Complaints

When a written complaint is received, follow these guidelines:

1. All written complaints must immediately be forwarded to a Complaints Officer.
2. The Complaints Officer will review the complaint and log its details through CompliSpace Assurance, and allocate the complaint to another staff member, where appropriate.
3. The Complaints Officer will contact the complainant by telephone (if possible) to acknowledge receipt of the complaint and to obtain additional information which may assist in expediting the matter internally. The College's guidelines for the management of verbal complaints should then be followed.
4. If it is not possible to contact the complainant by telephone, additional information should be sought through appropriately worded correspondence.

Managing and Escalating Complaints

This section is important for our Complaints Officers and the Complaints Manager because they will manage and escalate complaints as appropriate.

Step 3 - Screening Complaints

All complaints logged through CompliSpace Assurance will automatically be submitted to a nominated Complaints Officer.

As we encourage staff to log all complaints through CompliSpace Assurance, it is important that complaints are reviewed at the earliest possible opportunity to ensure that appropriate action is taken.

After the complaint is submitted and accepted, a Complaints Officer will screen the complaint and either accept or reject the complaint. If the complaint is accepted it will be managed through CompliSpace Assurance.

Step 4 - Establishing the Facts and Communicating with the Complainant

Once a Formal Complaint has been accepted, a Complaints Officer is nominated to conduct an internal investigation.

If the complaint involves a staff member, the investigation will be conducted as follows:

Stage 1	The Complaints Officer will immediately contact the named staff member and agree on a time (within 48 hours) to meet to discuss the matter, and gain access to relevant documentation.
Stage 2	At this meeting, the Complaints Officer will provide the staff member with details of the complaint, interview the staff member, and ask them to provide their version of events. The meeting will be documented. Refer to Record Keeping.
Stage 3	The Complaints Officer will match the facts of the complaint with the staff member's response and if the facts vary, through communication with the staff member and the complainant, clarify why they differ.
Stage 4	The Complaints Officer will prepare a report summarising key findings of the investigation. A summary of these findings will be entered into CompliSpace Assurance.

If the complaint concerns a matter which is not related to a staff member, the Complaints Officer will conduct an investigation based on the incident priority considering criteria such as severity,

complexity, impact and the need, and possibility, of immediate action.

The Complaints Manager will contact the complainant prior to the target resolution date and keep in regular contact, advising of the status of the matter, and each time confirming when the next communication should be expected. Refer to [Timeframes for Managing Complaints Internally](#).

Step 5 - Making a Determination

After considering all the facts available, a Complaints Officer must make a determination which addresses all aspects of the complaint. The following options are available:

- accept the complaint and take rectification action without offering redress
- accept the complaint and offer redress
- offer redress without accepting the complaint
- reject the complaint and provide reasons for such rejection.

Offers of redress or remedies may include:

- refunds
- technical assistance
- information
- referral
- financial assistance
- financial compensation
- apology
- goodwill gift or token
- indication of changes in services, process, policy or procedure arising from complaints.

Step 6 - Formulation of Proposed Resolution

The extent of any remedy will depend upon the nature of the complaint. Some complaints are administrative in nature and the remedy may be to rectify the administrative error and issue a verbal apology or acknowledgement to the complainant. Other remedies are more complex and may, for example, involve financial compensation. Where a financial remedy is considered appropriate, the aim is to provide fair compensation for any loss suffered.

In formulating a proposed resolution, matters to be considered include:

- the extent to which others may have suffered in the same way as the complainant but whom did not make a formal complaint

- the level of authority required internally to implement the proposed resolution
- the implementation of a strategy for following up where appropriate
- how information will be disseminated to relevant personnel within the organisation.

Step 7 - Presenting a Final Response and/or an Offer of Redress

The complainant must be advised of the outcome of any investigation or subsequent determination. This communication should set out:

- the substance of the original complaint
- an outline of the investigation undertaken
- the finding of the investigation
- any proposed resolution or offer of redress.

Where the resolution includes an offer of a financial remedy, a Complaints Officer may discuss the proposed offer with the complainant prior to providing the offer formally. This will allow a Complaints Officer to clearly explain the reasons behind the decision and allow a complainant to have any queries they may have answered directly.

All final responses and/or offers of redress should be approved by the Complaints Manager and the Principal or, in their absence, or if the complaints involves the Principal, the Deputy Principal. Where appropriate, offers of redress should be made in writing.

Recording and Reporting Complaints

This section is important for our Complaints Officers, and for the Complaints Manager who has ultimate responsibility for complaints records and complaints reporting at the College.

Step 8 - Complaints Register

CompliSpace Assurance is designed to capture the key data with respect to any individual complaint and to track the resolution process. CompliSpace Assurance automatically creates a Complaints Register that provides a summary of key data about all complaints in the system at any particular point in time.

The information contained in our Complaints Register can be used to identify trends in complaints and any systemic issues. This helps us determine where to focus attention on improving our internal processes (refer to Step 9 - Rectification and Risk Management) and improve our levels of stakeholder satisfaction.

The Complaints Register is reviewed in Leadership Team meetings and key information is provided to the Leadership Team on a regular basis (refer to [Complaints Reporting](#)).

Step 9 - Rectification and Risk Management

Regardless of whether a complaint has been resolved internally or not, it is important that we consider the circumstances that led to the complaint arising, and whether or not an opportunity exists to improve our internal systems and procedures, to reduce the risk of a similar complaint occurring again.

To clarify whether or not rectification work is required, the Complaints Manager will meet with the person responsible for the relevant area of work, review the underlying factors leading to the complaint being made, and make a recommendation as to what, if any, rectification work is required.

Where it is agreed that rectification work is required, the Complaints Manager will make a corrective action request by creating a task through CompliSpace Assurance. The use of corrective action tasks allows the College to monitor and report on the progress of rectification work.

Step 10 - Closing a Complaint

The complaint will be closed on CompliSpace Assurance once:

- the complaint has been resolved with the complainant (either internally or externally) or all reasonable internal and external options of rectification or remedy have been exhausted
- all relevant information about the complaint has been captured
- consideration has been given to the underlying risk associated with the complaint and, where appropriate, the risk has been included on the College's Risk Register
- any recommendations with respect to rectification work have been recorded in a corrective action task.

Procedural Fairness in Complaints Handling

It is critically important that throughout the entire complaints handling process, procedural fairness is accorded to the complainant and the person/s who are the subject of the complaint.

Procedural fairness in complaints handling requires:

- both the complainant and the person against whom the complaint is made to have the opportunity to be heard, in person or in writing as appropriate, and to respond to the allegations

and/or evidence offered by the other

- an objective investigation of issues or facts which are in dispute
- that the investigator is free from bias, or the perception of bias, and is not 'judge in his or her own cause'
- that any complaint outcome is supported by the evidence, necessitating a finding on the balance of probabilities in the event of a dispute of fact
- that the complaint outcome is finalised by an adjudicator, who may also be the investigator, who is free from bias or the perception of bias
- that the outcome is consistent with the College's established policies and/or procedures relevant to the complaint.

While it is the College's policy that these elements of procedural fairness are to be applied to each complaint received by the College, procedural fairness should not otherwise dictate the outcome of a complaint.

Processes for Review of a Complaint's Resolution

Part of the College's complaints handling process includes the option for review of a complaint's management and resolution.

Complainants are afforded a number of avenues throughout the complaints handling process should they feel that the complaint is not being handled as they see fit, including:

- seeking alternative dispute resolution other than through the College's Complaints Handling Program, for example through mediation which involves the assistance of an independent third party who helps parties to negotiate a settlement of the complaint or dispute
- seeking legal advice, should a complaint escalate to a dispute, to ensure that they know their rights relating to the issue at hand
- making a request for an alternative investigator for the complaint where the complainant perceives a conflict of interest, or potential for conflict of interest.

Complaints Manager Administration

Timeframes for Managing Complaints Internally

Timeliness in responding to complaints is a key element of successful complaints handling.

Immediate Acknowledgement of Complaint

We strive to immediately acknowledge the receipt of complaints and address them promptly in accordance with their degree of urgency.

Where we cannot acknowledge a complaint immediately, acknowledgement should be made as soon as practicable and, in any event, within ten business days.

Target Resolution Within 20 Days

We aim to resolve all complaints within 20 Days, with the initial investigation completed within 10 business days.

Extension Beyond 20 Days

If we are unable to respond to a complaint within 20 Days, a Complaints Officer will, prior to the end of the 20 Days period:

- contact the complainant by telephone, if possible, or otherwise in writing
- advise them of the reasons for the delay in resolution of their complaint
- advise them of a new target resolution date.

A Complaints Officer will then keep the complainant regularly updated on the status of their complaint.

External Dispute Resolution

In circumstances where a complaint cannot be resolved within a reasonable timeframe, the complaint may become subject to external dispute resolution.

St Mary's College may engage the services of one of the following organisations for the purposes of external dispute resolution:

- private conciliators or dispute resolution counsellors; or
- a complaints and appeal body established by a peak industry body.

It is St Mary's College's policy that when an external resolution process needs to be implemented, it is done having regard to the nature of the complaint.

Maintaining Confidentiality

Maintenance of confidentiality of information throughout the complaints management process is critical.

Confidentiality applies with respect to both information relating to the person making the complaint, and, if relevant, to a person against whom a complaint is made.

Personally identifiable information about a complainant should only be made available for the purpose of addressing the complaint and (unless the complainant consents) be actively protected from disclosure.

Where a staff member receives a complaint, and has logged the complaint through CompliSpace Assurance, they should not discuss the complaint with students, other parents/carers or any person who does not have authority to investigate or manage complaints on behalf of the College. In addition, the details of the complaint should not be discussed with other staff members who are not authorised to manage the complaint.

All written communications relevant to the complaint must also be kept confidential.

Program Maintenance, Record Keeping and Improvement

In designing our Complaints Handling Program, we considered our:

- legal and regulatory obligations as well as obligations to meet various guidelines, codes of practice, and standards, published or referenced by regulators
- objectives to improve internal processes and approval levels
- College's context by:
 - identifying and addressing external and internal issues that are relevant to the College's purpose and that affect our ability to achieve our objectives to improve internal processes
 - identifying the interested parties that are relevant to our complaints handling processes, for example parents, carers and community members, and addressing the relevant needs and expectations of these interested parties
 - identifying the scope of the complaints handling process, including its boundaries and applicability to various types of feedback received by the College and internal grievance procedures.

Record Keeping

Complete records of all complaints received, together with data regarding the overall performance of our complaints handling process, are recorded through CompliSpace Assurance and are readily

accessible to the Leadership Team.

We adopt the Complaints Handling Guiding Principle that whenever dealing with a complaint, and, in particular, when recording information relating to a complaint, this information may at some time in the future be requested by the complainant or a regulator, or may be made public as a result of litigation (whether related to or unrelated to the particular complaint). Our complaint records are maintained in a format which allows them to be provided to a regulator, or a complainant, if so requested.

If any particular information relating to a complaint is requested by an external party, we consider all of the circumstances of the request and, if necessary, seek legal advice as to what, if any information, we are legally required to provide.

Records with respect to training undertaken by our staff and representatives relating to this Complaints Handling Program are maintained through CompliSpace Assurance.

All records are maintained for a minimum of seven years. Child protection records are maintained indefinitely.

Maintenance

All complaints are categorised, and then analysed to identify systemic, recurring and single incident problems and trends, and to eliminate the underlying cause of complaints (refer to [Step 9 - Rectification and Risk Management](#)).

We continually monitor the overall performance of our complaints handling processes having regard to the size, nature and complexity of our organisation and to historical complaints data. This includes taking action to determine the levels of satisfaction of complainants after going through the complaints handling process.

Review and Improvement

The Leadership Team reviews this Program on a regular basis (at least annually) to:

- ensure its continuing suitability, adequacy, effectiveness and efficiency
- identify and address instances of non-conformity with health, safety, environmental, customer, statutory, regulatory and other relevant requirements
- identify and correct systemic issues that have been identified through complaints
- evaluate the effectiveness of the actions taken in relation to the complaints received, and risks and opportunities identified through complaints

- evaluate potential changes to the Program.

The Complaints Manager and the Leadership Team are responsible for providing relevant information, including changes in legislative and regulatory requirements, and complaints reports for the review.

The information obtained from these reviews is used to continually improve the Program.

Complaints Reporting

All complaints are logged through CompliSpace Assurance, which is maintained in real-time allowing a variety of reports to be produced that analyse complaints as they occur. These reports can be produced as needed.

Complaint Status

Complaints are either categorised as rejected, open or closed.

A complaint may be rejected from the outset as not being a complaint within the definition.

A complaint will be closed once it has been resolved, or once all reasonable options of recourse have been exhausted.

Reporting to EREA

It is critical that the Principal, Leadership Team and, where necessary, EREA, are notified of significant complaints as quickly as possible, and regularly informed as to the College's performance with respect to complaints handling.

It's the Complaints Manager's responsibility to report to the Leadership Team, to the College EREA Victorian Schools Board as and when required, and to EREA.

Complaints Handling Documents

[EREA Complaints Handling Policy and Guidelines](#)

[Complaints Handling Guide](#)

[Complaint Response Letter](#)