

Approved by:	Principal	Date approved:	22/3/2022	Next review:	22/3/2024
Document No:	1.10 POL		Version No:	2.0	
References and Supporting documents	Education Act 1990 (NSW) Registered and Accredited Individual Non-government Schools (NSW) Manual 1.10 FORM Complaint Form 2.1 Child Protection Policy WEA Illawarra-Novo Education Space Child Safe Program – Child Safety Complaints Management WEA Illawarra-Novo Education Space Child Safe Program – Reportable Conduct Policy and Procedures WEA 1P22 Whistleblower Policy WEA 1WI08 Whistleblower Procedure WEA 1P15 Workplace Discrimination, Harassment and Bullying WEA 1WI06 Discrimination Harassment and Bullying Procedures				

1. Purpose

The School's policies which are made from time to time are made pursuant to the requirements set out in Section 47 of the Education Act 1990 (NSW) and of the NSW Education Standards Authority (NESA) for registration and accreditation of the School.

This policy is intended to ensure that WEA Illawarra-Novo Education Space handles complaints fairly, efficiently and effectively.

This policy provides guidance to our staff and to people who wish to make a complaint on the key principles and concepts of our complaint management system.

2. Scope

This policy applies to all staff (paid and volunteer), contractors and our governing body, receiving or managing complaints from the public and clients made to or about us, regarding our products, services and staff, or our complaint handling process.

This policy does not extend to personal grievances between parents, guardians or other members of the school or college community.

3. Whistleblowing complaints

This policy does not extend to complaints which are whistleblowing disclosures. The procedure for processing whistleblowing complaints are dealt with in the organisation's Whistleblowing Policy.

In summary, a whistleblowing disclosure is a disclosure which:

- Is made by a Board member, staff member, a person who supplies goods or services to the organisation, including a volunteer, an employer of a supplier or a relative of any of these people;
- Involves alleged misconduct, an improper state of affairs or circumstances, or illegal activity, and
- Is made to an executive staff member, or board member, or the College's auditor or a person who the College has authorised to collect such disclosures.

4. Organisation Commitment

WEA Illawarra-Novo Education Space expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
CEO/ Principal or chair of the Board	Promote a culture that values complaints and their effective resolution	Report to the governing body on our complaint handling. Provide adequate support and direction to key staff responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. Encourage staff to make recommendations for system improvements. Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.
Staff whose duties include overseeing and managing of complaints (may include CEO/ Principal, Chair of the board or Executive Leadership Team members)	Demonstrate exemplary complaint handling practices	Treat all people with respect, including people who make complaints. Assist people to make a complaint, if needed. Comply with our policy and associated procedures. Provide regular feedback to management and/or the governing body on issues arising from complaints. Provide suggestions to management on ways to improve our complaints management system. Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.
All staff	Understand and comply with our complaint handling practices.	Treat all people with respect, including people who make complaints. Be aware of our complaint handling policies and relevant procedures. Assist people who wish to make complaints access our complaints process. Be alert to complaints and assist staff handling complaints resolve matters promptly.

5. Terms and Definitions

Complaint - A complaint or grievance is an expression of dissatisfaction made to the organisation about an educational and/or operational matter relating to services provided by the organisation or the behaviour or decisions of a staff member, contractor or volunteer, including misconduct.

Complaint handling/management system - All policies, procedures, practices, staff, hardware and software used by our organisation in the management of complaints.

Dispute - An unresolved complaint escalated either within or outside of our organisation.

Feedback - Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling system where a response is not explicitly or implicitly expected or legally required.

Grievance - A clear, formal written statement by an individual staff member about another staff member or a work-related problem.

Policy - A statement of instruction that sets out how we should fulfil our vision, mission and goals.

Procedure - A statement or instruction that sets out how our policies will be implemented and by whom.

6. Guiding Principles

An effective complaint handling system must be modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into organisational culture.

6.1. Facilitate Complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for review or appeal.

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

Accessibility

We will ensure that information about how and where complaints may be made to or about us is well publicised, on our website. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (eg advocate, family member, legal or community representative, member of Parliament, another organisation).

6.2. Respond to complaints

Early resolution

Where possible, complaints will be resolved at first contact with us. When appropriate we may offer an explanation or apology to the person making the complaint. If the complaint cannot be resolved initially it will be escalated accordingly through a formal process.

Responsiveness

We will promptly acknowledge receipt of complaints in writing.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

6.3. Managing the parties to a complaint

Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of our service providers.

Empowerment of staff

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

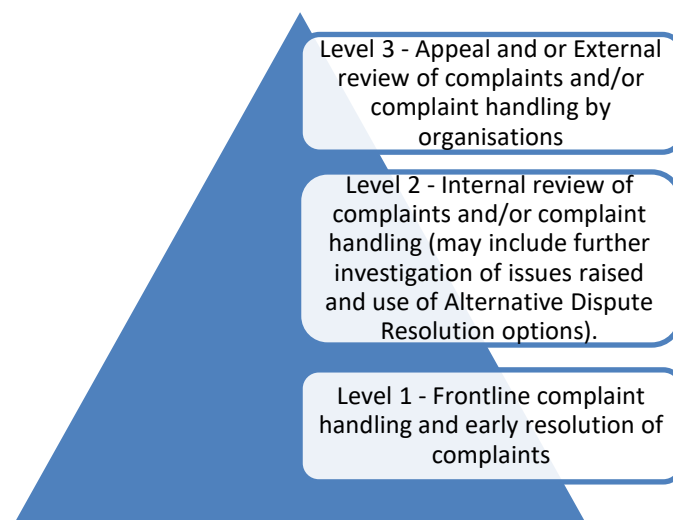
- our ability to do our work and perform our functions in the most effective and efficient way possible;
- the health, safety and security of our staff; and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them (including any relevant Ombudsman or oversight regulatory bodies).

The three levels of complaint handling



Level 1

We aim to resolve complaints at the first level, the frontline. Wherever possible staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Level 2

Where this is not possible, we may decide to escalate the complaint to a member of the Executive Leadership Team within our organisation. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Level 3

Where a person making a complaint is dissatisfied with the outcome of our review of their complaint, they may seek an appeal directly escalated to the CEO/Principal, or if the matter concerns the CEO/Principal, to the Chair of the Board. In order to save cost and time for all parties involved we encourage all complaints to be handled internally where possible. Alternatively, where this is not possible, an external review of our decision can be conducted by contacting a relevant external organisation such as (but not limited to):

- NSW Ombudsman
<https://www.ombo.nsw.gov.au/contact-us>
- NSW Education Standards Authority (NESA)
<https://www.educationstandards.nsw.edu.au/wps/portal/nesa/about/who-we-are/contact-nesa>
- Fair Work Ombudsman
<https://www.fairwork.gov.au/about-us/contact-us>

7. Accountability and Quality Reviews

7.1. Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis by management and the governing Board members.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to our CEO/ Principal, executive leadership and to our governing Board for review, at least annually.

7.2. Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints
- identify and correct deficiencies in the operation of the system

7.3. Continuous improvement

We are committed to improving the way our organisation operates, including our management of the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- regularly review the complaint management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Acknowledgements

This policy has been informed by the following:

- Australian and New Zealand Standard Guidelines for complaint handling in organisations AS/NZS 10002:2014
- 'Handling Privacy Complaints' Office of the Australian Information Commissioner (October 2016)
- NSW Ombudsman Complaint Handling Model Policy 2015
- 'Building better relationships through complaints' The Society for Consumer Affairs Professionals Australia (SOCAP) and The Australian Centre for Justice Innovation (ACJ), Monash University

Version	Date Approved	Approved By	Brief Description
1.0	4/2/2011	Principal	Creation of original document
	4/2/2013	Principal	Reviewed
	5/8/2013	Principal	Reviewed
2.0	30/3/2022	Principal	Updated: Major revision of content and closer alignment with Australian Standards and other best practice guidelines.