

Living Waters Lutheran College

COMPLAINTS HANDLING POLICY



Living Waters Lutheran College is committed to working with all members of the community in a manner which upholds the importance of building and maintaining positive relationships. The College welcomes feedback from all members of the College community and takes all complaints or concerns that may be raised seriously.

This policy has been established to ensure that concerns, complaints and grievances from students, parents and/or external parties are managed in a consistent way. The College acknowledges that complaints often provide an opportunity for improvement and engagement. Additionally, we recognise that effective complaint handling will benefit the reputation and administration of the College.

For the purposes of this policy, we use the terms "staff" and "staff member" to include all teaching and non-teaching staff, College Board members, volunteers, contractors and external providers.

What is a complaint?

A complaint is an expression of dissatisfaction made to Living Waters Lutheran College, related to our services or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

Complaints about Child Safety

Complaints about child abuse, grooming or other harm, or other breaches of our Child Safe Codes of Conduct, relating to conduct by:

- current or former staff members
- current or former students
- other people on College premises or at College events

are managed differently from other complaints.

Refer to the section at the end of this policy – **Complaints About Child Safety Incidents or Concerns at or Involving the College or its Staff Members** – for more information.

Living Waters Lutheran College's Commitment

Living Waters Lutheran College is committed to handling complaints effectively and efficiently. To manage complaints effectively, we have established a Complaints Handling Program in line with:

1. Principle 6 of the National Principles for Child Safe Organisations, using the Office of Child Safety's "Complaints Handling Guide: Upholding the Rights of Children and Young People"
2. the international complaints handling standard (ISO 10002:2018 Quality management – Customer satisfaction – Guidelines for complaints handling in organizations), and
3. the Australian/New Zealand complaints handling standard (AS/NZS 10002:2014 Guidelines for complaint management in organisations).

To manage complaints efficiently, Living Waters Lutheran College responds to complaints promptly and thoroughly.

Our Complaints Handling Program includes the establishment of an online complaints management system which allows us to effectively capture, manage and report on complaints. Regular analysis of complaints received to identify causes and systemic failures so as to inform continuous improvement are key to the College's commitment.

When handling complaints, Living Waters Lutheran College ensures that reporting, record keeping, privacy and employment law obligations are met.

Living Waters Lutheran College's complaints handling process conforms to the rules of procedural fairness and confidentiality – information is only shared with those who need to know.

Informal Complaints Resolution

The vast majority of issues causing concern in schools can be handled quickly and in an informal manner. We therefore ask that, where appropriate, you first raise your concern directly with the relevant staff member. It is acknowledged that this will often be the teacher of a child.

General guidelines to parents for informal complaint resolution regarding their child are as follows:

1. In the first instance talk to the **class/course teacher**. This is the person who is familiar with the child and their routines on a day to day basis and in the case of course teachers, have in depth knowledge of the requirements of their studies. Discussions can take place via SEQTA direct message, telephone, the diary or in person by mutual arrangement.
2. If matters cannot be resolved with a teacher or further advice is needed the **Year Level Coordinator or Head of Learning Area** is the next person to speak to. They have a leadership role a child's year level or course learning area and daily direct contact with students and teachers.

Even if the issue is resolved informally, all staff are required to log issues through our complaints management system so we are able to identify any systemic issues arising, and take appropriate rectification action.

How do I make a Formal Complaint?

If you have been unable to resolve a matter informally, or simply wish to make a formal complaint you can do so by any of the following means:

1. Telephoning the College and asking to speak to the student's Year Level Coordinator, Pastoral Care Teacher, Subject Teacher/Class Teacher or the College's Complaints Manager.
2. Provide your feedback/details of the complaint via our public website.
3. Use the complaints link via [the College website \(parents\)](#).
4. Sending an email to complaints@livingwaters.wa.edu.au
5. Write a letter to the College addressed to "The Complaints Manager".

All formal complaints will be logged into our online complaints management system and managed in accordance with the following procedure.

Our Internal Complaints Handling Process

Step 1 Receiving and recording the complaint

All formal complaints are logged through our online complaints management system where they are screened by one of our Complaints Officers, or in the case of complaints against the Principal, by the Chair of the College Board.

Step 2 Acknowledge the complaint

All valid complaints will be acknowledged at the time of receipt or as soon as possible afterwards. Complaints are allocated a status, priority and target resolution date. It is our policy, where possible, to resolve all disputes within 14 days.

Step 3 Assess the complaint and address immediate risks

The Complaints Officer shall conduct an investigation into the issues raised, following principles of procedural fairness, and make a determination.

Step 4 Resolving complaints

Following the determination, if appropriate, the Complaints Officer shall formulate a resolution and provide a written response to the complainant. The matter will be closed if this response is accepted.

Step 5 Further investigation

If the initial response is not acceptable the matter will be reviewed internally by the Principal or the Principal's delegate, who may seek additional information or submissions from the relevant parties. The Principal or their delegate seek to resolve all disputes within 14 days from the date that the review process is initiated. The matter will be closed if the response of the Principal, or their delegate, is accepted.

Step 6 Continuous improvement

All complaints received will be entered into our Complaints Register and, where appropriate, a corrective action request will be made to address any underlying processes which the complaints investigation revealed may require improvement.

Step 7 External resolution

If the matter remains unresolved, the complainant may pursue external resolution alternatives.

Child Friendly Complaints

The principles that apply to complaints also are applied to complaints and concerns raised by students. Living Waters Lutheran College is committed to improving the visibility, accessibility and responsiveness of the complaints process for students.

Students are encouraged to report complaints by talking to a teacher or another staff member they feel comfortable with, the Family and Student Counsellor, the Chaplain, the Head of a Learning Area or Year Level Coordinator or Head of School.

Students can make a complaint in different ways:

- Face to face
- By phone
- In writing (letter, email, via the suggestion box at Student Services or via the **College portal**)

Complaints will be acknowledged at the time of receipt or as soon as possible afterwards. Children and young people are often wary about making a complaint and want to be assured they are being listened to straight away.

Complaints that appear trivial still need to be handled seriously. Young people may test the complaints procedures on relatively minor issues before finding the confidence to raise something painful such as bullying.

If the issue is a painful one, or if exploration of it is taking time, a student may need support from another student or from an adult. Students should be encouraged to choose a person with whom they feel comfortable to provide support.

In circumstances involving an allegation or complaint in relation to grooming, child abuse and breaches of the Code of Conduct, it is required that the Schools Child Safe Reporting Policy and Procedures are followed, and the matter is reported promptly to the responsible government authorities.

Confidentiality

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. The College is committed to maintaining the confidentiality of information throughout the complaints process.

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

Referral of a complaint to the College Board

Generally, the Chair of Board and Board members are not directly involved with the receipt, investigation or resolution of complaints other than complaints arising within or about the College Board itself.

In instances where a complaint is about the Principal, a person may, if they feel the matter cannot otherwise be resolved or feels it is appropriate to do so, lodge a formal complaint with the Chair of the Board. In turn, and in consultation with the parent, the Chair of the Board will expeditiously take all reasonable steps to have the complaint fully investigated and to facilitate a resolution.

Formal correspondence to the Chair of Council can be addressed to the following

*Chair of the Board
Living Waters Lutheran College
PO Box 997
Rockingham WA 6968*

Or email the Chair of the Board at board@livingwaters.wa.edu.au

Referral of a complaint to an external authority

When a complaint is not or cannot be resolved within the College, the parties may seek the assistance of external professional agencies e.g. Lutheran Schools South Australia, Northern Territory, Western Australia (LESNW) or other independent arbitrators.

Record keeping

Accurate, appropriate and secure records will be kept at the College on its Complaints Register.

Complaints About Child Safety Incidents or Concerns at or Involving the College or its Staff Members

Complaints about or allegations of:

- breaches of the Child Safe Codes of Conduct
- child abuse, grooming or other harm of a current or former student by
 - current or former staff members
 - current or former students
 - other people on College premises or at College events

are managed by the College in a different manner from other complaints.

This is because of the **additional confidentiality and privacy requirements** surrounding these kinds of matters.

We refer to these as *child safety related complaints*.

If your complaint is a child safety related complaint, please make your complaint to: the Principal (Senior Child Safety Officer), Mr Francois Pienaar at fpienaar@livingwaters.wa.edu.au or 0433 583 114, if this person is the subject of your complaint, please notify the Board Chairperson at board@livingwaters.wa.edu.au

For information about how the College manages child safety related complaints, as well as any child safety incidents or concerns at or involving the College or its staff members, please refer to our Procedures for Managing Child Safety Incidents or Concerns At or Involving the College or its Staff, Volunteers or Contractors, available on our public website.

The Role of the Director General

The Director General of the Department of Education is responsible for ensuring that the College observes the Registration Standards, including the standard about its complaints handling system. Any student, parent or community member is entitled to contact the Director General with concerns about how the College has dealt with a complaint. Information is available on the Department of Education website. While the Director General may consider whether the College has breached the Registration Standards, she does not have the power to intervene in a complaint or override the College's decision.

References

National Principles for Child Safe Organisations

International complaints handling standard (ISO 10002:2018)

Australian complaints handling standard (AS/NZS 10002:2014)

Related School Policies

Privacy Policy

Complaints		
<i>Version</i>	<i>Action</i>	<i>Date</i>
V1		
		<i>Review</i>