



# ST URSULA'S

COLLEGE | YEPPOON

## COMPLAINTS HANDLING POLICY

Date	Reviewed By	Approved	Version
06/10/2022	CLT: <ul style="list-style-type: none"><li>• D Pascoe</li><li>• B Connolly</li><li>• B Flanders</li><li>• P Tomkins</li><li>• D Ryan</li></ul>	Name: D Ryan Signed: <i>D Ryan</i> Title: Principal	1.0
Next Review to be Completed by:		06 October 2024	

*We acknowledge the traditional custodians of these lands and waterways, the Darumbal people. We pay respect to Elders past, present and emerging.  
May we walk gently on this land.*

CHANGES TO THIS POLICY	
DATE OF CHANGE	REASON

## 1. RATIONALE

At St Ursula's College complaints will be resolved in a manner that affirms the dignity of those involved and delivers outcomes that foster reconciliation and personal growth. Our policy for handling complaints seeks to give a voice to all parties and to deal with all complaints in a timely manner. The aim is to ensure that all complaints are dealt with promptly and sensitively in a manner that incorporates the principles of procedural fairness and natural justice.

## 2. ST URSULA'S COLLEGE COMMITMENT

St Ursula's College is committed to resolving all complaints effectively to ensure that individuals raising a complaint are supported, treated fairly and given ample opportunity to express their views and concerns.

Consistent with its Christian ethos, Catholic heritage and Presentation charism, the College is called to foster an atmosphere characterised by mutual respect for all. The College's core values are expressed in our Vision and Mission Statement and our six College Values – Faith, Respect, Excellence, Compassion, Hospitality and Simplicity. Christian values of justice, love, compassion, respect for individual dignity, and reconciling forgiveness lie at the heart of procedures designed to resolve complaints and grievances.

The College is committed to seeking and receiving feedback and complaints about our services and practices. All reasonable steps will be taken to ensure that people making a complaint are not adversely affected because a complaint has been made by them or on their behalf.

## 3. SCOPE

This policy applies to students, parents/guardians of students and staff of St Ursula's College.

A complaint covered by this policy is distinguished from some cases where other legislation applies eg:

- Matters relating to Child Protection (see Child Protection Policy)
- Student bullying complaints are dealt with in accordance with our Bullying Prevention & Intervention Policy, Student Code of Conduct and Student Behaviour Management Procedure
- Staff grievances (see Staff Grievance Policy, Resolution of Complaints Against Staff Policy, Staff Code of Conduct and Complaints Procedure). For all staff, the dispute resolution procedure as outlined in the Enterprise Bargaining Agreement will be honoured.
- Breaches of the Staff Code of Conduct
- Breaches of privacy (see Privacy Policy)
- Disclosures with respect to serious or dishonest or illegal activity within the College (see Whistleblower Policy)

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- Requests for feedback or information.

## 4. WHAT IS A COMPLAINT?

A complaint is an expression of dissatisfaction made to or about the College, our service and/or our staff or the handling of a complaint where the response or resolution is explicitly or implicitly expected or legally required.

## 5. OUR COMPLAINTS FRAMEWORK

Anyone making a complaint will be provided with information about our complaint handling process as detailed in this policy. The College will ensure that our processes to manage complaints are easily understood and accessible to everyone.

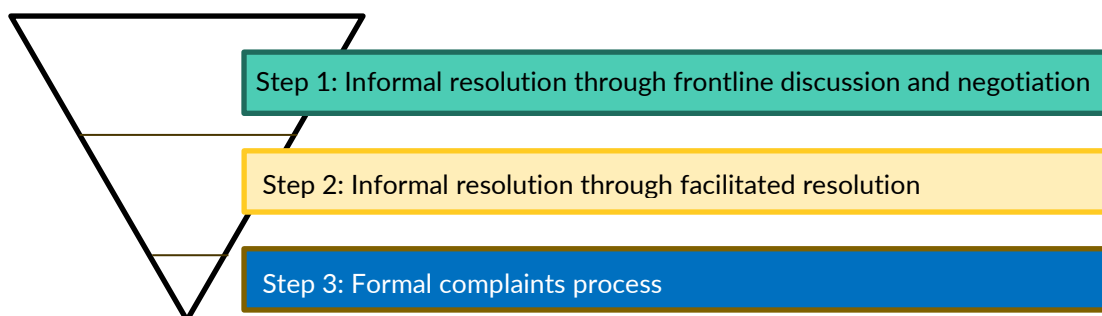
The College recognises that some complaints can be resolved promptly and will therefore adopt a flexible approach in order to maximise a timely resolution. Each complaint will be assessed on its merits and where possible the complainant will be involved in the resolution process.

All parties to the complaint will be appropriately supported. Each complaint will be addressed with integrity and in an objective and unbiased manner. Any conflicts of interest will be managed responsibly. The person handling the complaint will be different from any staff member whose actions are the subject of the complaint.

The College will maintain the appropriate levels of privacy and confidentiality as far as practical and within all relevant laws and regulations.

## 6. THREE STEP COMPLAINTS PROCESS

The College operates a 3-step process to resolving complaints.



The College encourages informal resolution of complaints through direct frontline discussion and negotiation (Step 1). This does not prevent a complainant from deciding, at any time, to follow the facilitated resolution process (Step 2) or to make a formal complaint to the Principal (Step 3).

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## STEP 1: Informal Resolution Through Frontline Discussion & Negotiation

Wherever possible the College aims to resolve complaints informally through frontline discussion and negotiation. Most complaints will be able to be satisfactorily remedied through communication with staff, curricular and pastoral leaders and the College leadership team. Ideally, a person wishing to make a complaint is encouraged to approach the staff member concerned and attempt to resolve the issue through dialogue using an open, non-defensive and objective process.

Staff are trained and empowered to resolve complaints that are relevant to their roles and responsibilities. The approach may be made either in person, by phone or in writing. In order to give the process, the greatest chance of success, the parties should:

- Adopt an open, non-defensive and unbiased communication process.
- Focus on the issue or complaint and not on the personality.
- Have a clear idea of what the issue is and the grounds on which it was made.
- Work cooperatively to determine how best to resolve the issue.
- Look for constructive solutions.

Complainant	Initial approach may be to:
Student	Teacher, Coach, House Group Teacher, Boarding Supervisor, Head of Boarding, Head of School, Head of Department or Student Protection Contact Officers
Parent/Guardian	Teacher, Boarding Supervisor, Head of Boarding, Head of School or Head of Faculty
Staff	Principal, Deputy Principal – Teaching and Learning, Deputy Principal – Spirituality and Pastoral, Business Manager, Head of Boarding, Head of Faculty, Head of School if it is a House Group Teacher making the complaint, Chair of the Board if the complaint is about the Principal.

## STEP 2: Informal Resolution Through Facilitated Resolution Process

Step 2 provides for a facilitated resolution process. This option seeks to assess and investigate the complaint and facilitate a resolution. Either party can request an informal facilitated resolution process.

The facilitator is responsible for:

- Firstly, discussing the issue with a member of the Leadership Team.
- Informing the staff member that a complaint has been referred to her/him.
- Facilitating resolution of the issue through an open and transparent process of dialogue, mediation and negotiation. Parties concerned will cooperate in seeking a mutually acceptable solution.

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- Preparing a written record of the issue, its resolution and actions taken. A copy will be provided to all parties and to the Principal who will place a copy in the confidential employee file.

The facilitator may be one of the following people:

Area of concern	Facilitator
Curriculum/academic issue	Head of Department
Pastoral issue	Head of School
Boarding issues	Head of Boarding
Complaint is against a Head of Faculty	Deputy Principal- Teaching and Learning
Complaint is against a Head of House or Counsellors	Deputy Principal- Spiritual and Pastoral
Complaint is against a Deputy Principal, Director of Operations and Analytics or Business Manager	Principal
Complaint relates to administrative and support staff	Business Manager
Complaint is against the Principal	Chair of the Board

### STEP 3: Formal Complaints Process

Where the matter has not been resolved informally, or where a formal complaint is to be made, this may be done by any of the following means:

1. Sending an email to [principal@ursulas.qld.edu.au](mailto:principal@ursulas.qld.edu.au)
2. Writing a letter to St Ursula's College addressed to The Principal, or if the complaint is against the Principal, addressed to the Chair of the Board.
3. Telephoning St Ursula's College to register your concern and following this up in writing.

Our internal formal complaints handling process operates as follows:

<b>A.</b>	All formal complaints will be logged into our complaints register. Formal complaints are reviewed by the Principal. Details of the procedure that will be followed are in Complaints Procedure. In the case of a complaint directly related to conduct of the Principal the complaint will be reviewed by the Chair of the College Board.
<b>B.</b>	Complaints will be acknowledged in writing, as soon as practicable (within 10 business days after receipt of written complaint). Complaints will be assessed and prioritised and complainants will be advised who will be managing the complaint and the target resolution date.
<b>C.</b>	The assessment and any subsequent investigation will examine the issues raised, following the principles of procedural fairness and natural justice.

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<b>D.</b>	<p>At the conclusion of the investigation a resolution will be formulated based on the findings and evidence and a written response will be provided to the complainant confirming:</p> <ul style="list-style-type: none"> <li>• the outcome of the investigation and any action taken</li> <li>• the reason for decisions taken</li> <li>• any corrective actions that have been proposed or implemented. The matter will be closed if this response is accepted.</li> </ul>
<b>E.</b>	<p>If the response is not accepted the matter may be referred to the Chair of the Board or the Chair's delegate (within 14 days of receipt of a written complaint about the resolution reached at stage D). The Chair, or delegate will make enquiry into the process undertaken and whether due process and natural justice were provided under our Complaints Policy. The Chair or delegate will seek to respond to the complaint within 20 business days of the acknowledgement of the complaint. The matter will be closed if the response of the Chair, or their delegate, is accepted.</p>

The decision of the College following this complaint process constitutes the conclusion of the matter in terms of the College's Complaints Handling Policy. If the matter remains unresolved or in the event of a dispute the complainant is able to pursue external resolution alternatives.

The College will investigate anonymous complaints if there is enough information in the complaint to carry out an investigation. Complainants are encouraged to provide as much information as possible so that issues raised can be addressed fairly and effectively. Ideally, a written complaint should include:

- complainant name and contact details
- date
- details of the complaint
- who was involved
- whether there were any witnesses
- other relevant documents or information that may assist the College with its investigation.

When faced with people who behave unreasonably or complaints that are found to be vexatious, the College will take proactive and decisive action to manage any conduct that unreasonably affects the College and staff will be supported to do the same.

## 7. CONFIDENTIALITY

The College will afford privacy and confidentiality to all parties to the extent required by and permitted by law. Information with respect to the complaint will remain confidential and only be disclosed to staff within the College on a need-to-know basis. Personally identifiable information about a complainant will only be made available for

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the purpose of addressing the complaint and, unless the complainant consents, will be actively protected from disclosure.

The College requires and expects that all parties will, when addressing concerns and complaints, maintain the confidentiality of all parties strictly in accordance with confidentiality and privacy policies and legislative requirements.

## 8. CONTINUOUS IMPROVEMENT

Complaints can provide a valuable source of information about the College's performance and any areas that need improvement. The College will ensure that complaints are recorded in a way that enables suitable analysis.

The College will prepare reports on complaints that will include:

- The number of complaints received in a given period
- The outcomes of the complaints including implementation of improvements
- Any systemic issues identified
- Timeliness of responding to and resolving complaints
- Any unresolved complaints

Complainants are encouraged to discuss their concerns with the relevant staff member in the first instance.

Complaints to Staff Members	External Resolution	
<p>Staff member name St Ursula's College Queen Street, Yeppoon, 4703 College email: administration@stursulas.qld.edu.au College Reception: 07 49399600</p>	<p><b>Complaints about the College Governing Body</b> Complaints about the governing body may be directed to our member Mercy Partners: Mercy Partners Council Chair PO Box 39, Nundah Qld 4012</p>	
<p><b>Complaints to the Principal</b> The Principal St Ursula's College Queen Street, Yeppoon 4703 Email: principal@stursulas.qld.edu.au</p>	<p><b>Non-State Schools Accreditation Board (NSSAB)</b> Please refer to the NSSAB website for more information on how to lodge a complaint and the jurisdiction of NSSAB in handling complaints. Non-State School Accreditation Board (NSSAB), PO Box 15347, City East QLD 4002 Email: <a href="mailto:Admin@nssab.qld.edu.au">Admin@nssab.qld.edu.au</a> Web: <a href="http://www.nssab.qld.edu.au">www.nssab.qld.edu.au</a></p>	
<p><b>Complaints to the Chair of the Board</b> Complaints About the Principal or a Director should be addressed to: The Chair St Ursula's College Board St Ursula's College, Queen Street, Yeppoon 4703</p>		
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## 9. ACCOUNTABILITY

Role	Responsible for
Board	Oversight and review.
Principal	Implementation of this policy. Managing formal complaints in accordance with this policy. Reporting to the Board on complaint trends and issues arising from complaints. Ensuring training and adequate support is provided to all staff who deal with complaints.
Leadership Team Heads of School Heads of Department	Compliance with this policy and the complaints handling process. Facilitating complaint resolution as appropriate. Ensuring adequate reporting is completed for any complaint received. Implementing changes identified from individual complaints.
All staff	Treating all people with respect, including those making a complaint. Complying with this policy. Assisting people to make a complaint if needed. Providing feedback to the leadership team on issues arising from complaints.

Linking documents

Child Protection Policy

Description	Document Type
	Policy
Bullying Prevention & Intervention Policy	Policy
Privacy Policy	Policy
Staff Grievance Policy and Procedure (one document)	Policy/Procedure
Staff Code of Conduct	Code of Conduct
Whistleblower Policy	Policy
Complaints Register	Register
Education (Accreditation of Non-State Schools) Regulation 2017	Regulation

## 10. GLOSSARY OF TERMS

Term (Listed Alphabetically)	Definition
<i>Complainant</i>	The person making the complaint.
<i>Complaints Manager</i>	A delegate appointed by the Principal to manage a specific complaint. This could be a staff member or an external, independent person.
<i>Dispute</i>	A dispute is an unresolved complaint which is escalated for external resolution.
<i>Staff Grievance</i>	A staff grievance is a clear, formal statement by a staff member specifically in relation to unfair treatment.
<i>Feedback</i>	Feedback relates to opinions, comments and expressions of interest made directly or indirectly to or about the College, where a response is not explicitly or implicitly expected or legally required.
<i>Leadership Team</i>	<p>The College Leadership Team comprises:</p> <ul style="list-style-type: none"> <li>• The Principal</li> <li>• Deputy Principal –Teaching and Learning</li> <li>• Deputy Principal – Spirituality and Pastoral</li> <li>• Director of Operations and Analytics</li> <li>• Business Manager</li> </ul>
<i>Mercy Partners</i>	Mercy Partners is the sole member of St Ursula's College Limited. It is incorporated under the Roman Catholic Church (Incorporation of Church Entities) Act 1994 (Qld) and given status as a Public Juridic Person by the Congregation for Institutes of Religious Life and Societies of Apostolic Life.

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Term (Listed Alphabetically)	Definition
<i>Natural Justice</i>	Natural justice protects against arbitrary exercise of power by ensuring fair play. It is based on two fundamental rules: (1) Audi alteram partem (Latin for, hear the other side): no accused, or a person directly affected by a decision, shall be condemned unless given full chance to prepare and submit his or her case and rebuttal to the opposing party's arguments; (2) Nemo iudex in causa sua (Latin for, no man a judge in his own case): no decision is valid if it was influenced by any financial consideration or other interest or bias of the decision maker.
<i>Non-State Schools Accreditation Board (NSSAB)</i>	The NSSAB is an independent statutory body under the Education (Accreditation of Non-State Schools) Act 2017. The Board monitors whether non-State schools continue to comply with the requirements for accreditation.
<i>Procedural Fairness</i>	Procedural fairness means fairness in the procedures followed when arriving at an administrative decision. Procedural fairness requires decisions to be consistent with: <ul style="list-style-type: none"> <li>• the bias rule— free from bias or apprehension of bias by the decision-maker.</li> <li>• the evidence rule—rational or based on evidence that is logically capable of supporting the facts.</li> <li>• the hearing rule—providing people likely to be adversely affected by decisions an opportunity to present their case and have their response taken into consideration before the decision is made.</li> </ul>
<i>St Ursula's College Board</i>	The governing body of the College.
<i>Whistleblowing</i>	A disclosure raised against any wrongdoing, illegal act or gross misconduct taking place at the College.

## 11. APPENDIX A – FORMAL COMPLAINTS HANDLING PROCEDURE

Step	Procedure
1.	<p>The complainant submits the complaint in writing. This should include as much information as possible, including:</p> <ul style="list-style-type: none"> <li>• Complainant name and contact details</li> <li>• date and time</li> <li>• details of the complaint including who was involved</li> <li>• whether there were any witnesses</li> <li>• other relevant information and/or documentation</li> </ul>
2.	<p>The Principal will assess the complaint. The Principal may decide whether to appoint a delegate to manage the process and conduct interviews (the Complaint Manager). If the complaint is against the Principal, it will be assessed by the Chair of the Board. If the complaint relates to a staff member, they will be informed promptly by the Principal:</p> <ul style="list-style-type: none"> <li>• that there will be an investigation</li> <li>• that it will follow the Complaints Handling Policy and/or other relevant Policies</li> <li>• who the Complaint Manager will be</li> <li>• the general nature of the complaint and full particulars of the alleged offences</li> </ul>
3.	<p>The College will acknowledge receipt of the complaint to the complainant</p>
4.	<p>An assessment will be undertaken by the Principal or the Complaint Manager to decide on the most appropriate course of action. All parties will be advised of the process to be followed to resolve the complaint. The process will follow the principles of procedural fairness and natural justice. When assessing complaints, the following will be considered:</p> <ul style="list-style-type: none"> <li>• the seriousness or urgency of the complaint</li> <li>• whether the complaint relates to people's health and safety</li> <li>• how the person making the complaint is being affected</li> <li>• the risks involved if resolution is delayed or unable to be reached internally</li> <li>• who needs to be notified about the complaint</li> <li>• any investigations to be undertaken</li> <li>• the appropriate levels of involvement of the parties in the resolution process</li> </ul> <p>If the issue relates to an immediate risk to safety or security the response will be immediate, and it will be escalated appropriately.</p>
5.	<p>The Principal or Complaint Manager will gather the evidence from the parties and witnesses and decide whether to:</p> <ul style="list-style-type: none"> <li>• attempt to resolve the complaint through resolution strategies such as mediation</li> <li>• take no further action if the complaint is not substantiated</li> <li>• refer the complaint to the relevant internal or external agency if required</li> <li>• initiate any further internal investigation of the complaint if further information is required</li> </ul>

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6.	<p>If a further investigation is required, it must include:</p> <ul style="list-style-type: none"> <li>• collecting and analysing information relevant to the matter</li> <li>• working collaboratively with all parties involved</li> <li>• finding the facts relating to the matter</li> <li>• identifying any contributing factors to the matter</li> <li>• documenting the investigation report or outcome.</li> </ul> <p>Either party may request the presence of a support person and should be encouraged to have one. All parties will be asked to treat the matter sensitively and with the appropriate levels of confidentiality. All statements taken will be cited as a “true record” of information given.</p>
7.	<p>The Principal, or if it a complaint against the Principal, the Chair of the Board, will decide on the most appropriate outcomes and will inform the parties in writing within 28 days of receipt of the complaint. This will include reasons for the outcomes.</p>
8.	<p>The Principal will put in place any outcomes resulting from the decision. These may include disciplinary outcomes for staff and students.</p>
9.	<p>If the complainant is not satisfied with this response, they are encouraged to discuss it further with the College Principal and/or request that it is referred to the Chair of the Board.</p>