



## Complaints Handling Policy and Procedure

<b>Purpose:</b>	The purpose of this policy and procedure is to provide written processes about receiving, assessing, investigating and otherwise engaging with complaints. Compass seeks to ensure that child/young person, parent/guardians and employee complaints and disputes are dealt with in a responsive, efficient, effective and fair way.	
<b>Scope:</b>	Any person directly affected by the subject of a complaint, which may include children/young people, parents/guardians, employees, contractors, volunteers and people undertaking work experience or vocational placements.	
<b>Appendices:</b>	See Appendix A for a summary of the Complains handling process.	
<b>Status:</b>	Approved	<b>Supersedes:</b> 4/11/2024
<b>Authorised by:</b>	Board Chair	<b>Date of Authorisation:</b> 28/05/2026
<b>References:</b>	<ul style="list-style-type: none"> <li>● <a href="#">Australian Education Regulations 2023</a></li> <li>● <a href="#">Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</a></li> <li>● <a href="#">Fair Work Act 2009 (Cth)</a></li> <li>● <a href="#">Work Health and Safety Act 2011 (Qld)</a></li> <li>● <a href="#">Privacy Act 1988 (Cth)</a></li> <li>● <a href="#">Anti-Discrimination Act 1991 (Qld)</a></li> <li>● <a href="#">Australian Human Rights Commission Act 1986 (Cth)</a></li> <li>● <a href="#">Sex Discrimination Act 1984 (Cth)</a></li> <li>● <a href="#">Age Discrimination Act 2004 (Cth)</a></li> <li>● <a href="#">Disability Discrimination Act 1992 (Cth)</a></li> <li>● <a href="#">Racial Discrimination Act 1975 (Cth)</a></li> <li>● <a href="#">Standards Australia, Guidelines for complaint management in organisations (ISO 10002:2022, NEQ)</a></li> <li>● Child Safe Organisations Act 2024 (Qld)</li> <li>● Child Safe Organisations   Queensland Family and Child Commission</li> <li>● Compass Independent School Board Constitution and Charter</li> <li>● Relevant Compass policies and procedures including: School Enrolment Contract, Complaints Handling Procedure, Child Protection Policy, Workplace Health and Safety Policy, Code of Conduct, Anti-Discrimination Policy, Sexual Harassment Policy, Disability and Inclusion Policy, Workplace Bullying Policy, Privacy Policy</li> </ul>	
<b>Review Date:</b>	Triennially	<b>Next Review:</b> 27/05/2029
<b>Policy Owner:</b>	School Governing Body	

1 Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

## Part A: Complaints Handling Policy

### Policy Statement

Compass Independent School acknowledges the right of children/young people, parents/guardians, staff and others to complain when dissatisfied with the school's services including an action, inaction or decision of the school. The school encourages constructive criticism and complaints. Compass Independent School is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way. Compass Independent School will ensure staff can recognise, receive, and appropriately refer complaints to the informal or formal complaints procedure

Compass Independent School recognises that time spent on handling complaints can be an investment in better service to children/young people and parents/guardians and a better culture for employees, and views complaints as part of an important feedback and accountability process.

Compass Independent School values an informal and collegial approach to resolving concerns whenever possible, as we believe this fosters open, respectful and caring communication between our community members. The school seeks to handle complaints with a focus on understanding, kindness and mutual respect with the aim of maintaining a positive school culture and supportive environment for each person.

### Definitions

Communication	Communication occurs regularly between the school and families and does not constitute a complaint. Communication refers to routine interactions, enquiries, feedback, requests for information or clarification and informal discussions regarding a child/young person, program, service, decision or school operation.
Complaint	An expression of dissatisfaction made to or about the school, related to the school's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required <sup>1</sup> .
Informal Complaint	A complaint about a matter that is likely to be simple, straight forward, easily manageable, or minor, where a simple or quick resolution is appropriate such as discussion of the matter with a relevant staff member.
Formal Complaint	A complaint about a matter that is serious, complex or may pose a threat to the health and safety of any person. Examples include serious allegations or breaches of policy, complaints against a senior staff member, including a principal or an informal complaint that could not be resolved informally. Assessment of the complaint is required by a principal, except in the cases that the complaint relates to the principal's conduct.
Complainant	The person, organisation or their representative making a complaint.

<sup>1</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

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

<sup>3</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

Respondent	The person who is referred to in a complaint by a complainant as the person responsible for their concerns or who can best respond to their concern.
Complaint about a staff member	A complaint about a staff member refers to an allegation concerning the personal or professional conduct in the course of their duties, such as inappropriate behaviour, misconduct, or failure to meet expected standards of conduct. It does extend to concerns about the operations of the school, such as the educational program, curriculum delivery, or teaching, leadership or administrative decisions. These matters constitute complaints about the school and are managed accordingly.
Delegate	<p>A staff or board member who has been authorised by a Principal to perform specific functions or make decisions on their behalf in relation to this complaints handling process.</p> <p>Delegation may be general (for a category of matters) or specific (for an individual complaint) and will remain consistent with a Principal’s overall responsibility for the school.</p> <p>A Principal may delegate aspects of complaints handling where:</p> <ul style="list-style-type: none"> <li>● the matter does not require Principal-level decision-making due to its seriousness or complexity</li> <li>● delegation supports timely and effective resolution of the complaint</li> <li>● the delegated staff member has appropriate seniority, expertise or role responsibility</li> <li>● there is no conflict of interest affecting the delegate’s ability to act impartially</li> <li>● the delegation is consistent with school governance requirements and relevant policy.</li> </ul> <p>Delegation is not appropriate where:</p> <ul style="list-style-type: none"> <li>● the complaint involves allegations against a Principal (or where the Principal’s conduct is central to the complaint)</li> <li>● the matter requires final determination that, under policy or regulation, must be made by a Principal or governing body</li> <li>● the complaint is of a serious nature where independent or higher-level oversight is required (e.g. significant safety, conduct or legal risk issues)</li> <li>● a conflict of interest would reasonably be perceived to affect the delegate’s impartiality</li> <li>● external procedures, regulatory requirements, or escalation pathways specify that a Principal must retain responsibility.</li> </ul>
Board appointed complaints contact	An individual designated by the Board to receive, manage or oversee complaints at an appropriate level of independence from the school’s day-to-day administration. This role may include handling complaints relating to a principal, supporting the escalation of formal complaints and ensuring that complaints are managed in accordance with this policy where independent oversight is required. The Board-appointed complaints contact acts on behalf of the Board within the scope of their delegated authority.

1 Standards Australia, *Guidelines for complaint management in organizations (ISO 10002:2018, NEQ)*, s.4.3

2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

## Complaints handling principles

Compass Independent School will manage complaints according to the following (which include principles of procedural fairness):

- complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe
- complaints should be resolved with as little formality and disruption as possible, having regard to the nature of the complaint; and consideration be given to options including mediation, negotiation and informal resolution are optional alternatives
- interested parties to the complaint (for example, the complainant and any respondent) will be heard and/or may provide relevant information in relation to the complaint
- procedural fairness will be ensured wherever practicable, including the right of interested parties to the complaint to be heard
- while there is no right to anonymity in this process, confidentiality and privacy will be maintained as much as possible
- a child-centred approach will be maintained and all complaints will be managed in a manner that prioritises the child/young person's safety, wellbeing, and voice
- trauma-informed and culturally safe approach to managing complaints will be prioritised
- the complainant and any respondent will be offered support as appropriate
- victimising behaviour towards a complainant, respondent or other people associated with the complaint, will not be tolerated.

## Complaints that may be Resolved under this Policy

Compass Independent School encourages anyone who feels impacted by an issue involving the school to raise their complaint. Complaints can address matters such as:

- the school, its employees or children/young people having done something wrong
- the school, its employees or children/young people having failed to do something they should have done
- the school, its employees or children/young people having acted unfairly or impolitely
- issues of child/young person or employee behaviour that are contrary to their relevant code of conduct, including inappropriate staff conduct as reported by a student<sup>2</sup>
- issues related to learning programs, assessment and reporting of child/young person learning
- issues related to communication with children/young people or parents/guardians or between staff
- issues related to school fees and payments
- general administrative issues
- issues relating to non-compliance with a process outlined in school policies or procedures, for example the child protection policy, discrimination policy, or privacy policy.<sup>3</sup>

<sup>1</sup> Standards Australia, *Guidelines for complaint management in organizations (ISO 10002:2018, NEQ)*, s.4.3

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

<sup>3</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

Complaints by child/young person complaints may be brought by parents/guardians on behalf of their child/young person, as appropriate in the circumstances.

### **Issues Outside this Policy**

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

- Child protection concerns including allegations of sexual abuse, likely sexual abuse or harm to children should be dealt in accordance with the school's Child Protection Policy.
- Bullying complaints should be dealt with under the Code of Conduct
- Discipline matters, including matters involving suspension or expulsion, should be dealt with under the Code of Conduct.
- Violence or criminal matters should be directed to a Principal (or delegate), who will involve the Police as appropriate.
- Disputes relating to a staff member's employment should be directed to their manager and dealt with under the relevant agreement and employment law. This does not include disputes about work health and safety matters, which may be dealt with under the school's Complaints Handling Policy.
- Disputes between board members should be dealt with in accordance with the Constitution and Charter.
- Formal legal proceedings should be managed as appropriate in the circumstances.
- Complaints relating to the education and training services provided by the school to an overseas student should be dealt with in accordance with the Education Services for Overseas Students Act 2000 and National Code and the school's Overseas Student's Complaints and Appeals Policy and Process.

Where a complainant has identified that their concern is out of scope with this policy and is unsure of the appropriate process or point of contact, they are encouraged to contact a principal (or delegate) for guidance on the relevant procedure under the school's policies.

### **School Responsibilities**

The school has the following role and responsibilities:

- develop, implement, promote and act in accordance with the school's Complaints Handling Policy and Procedure
- appropriately communicate the school's Complaints Handling Policy and Procedure to children/young people, parents/guardians and employees
- ensure that the Complaints Handling Policy and Procedures are readily accessible by staff, children/young people and parents/guardians
- upon receipt of a complaint, manage the complaint in accordance with the Complaints Handling Procedure
- ensure that appropriate support is provided to all parties to a complaint
- take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them
- appropriately implement remedies
- appropriately train relevant employees

*1 Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3*

*2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)*

*3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)*

- keep records, including maintaining the Complaints Register
- conduct an annual review/audit of the Complaints Register
- monitor and report regularly to the governing body on complaints
- report to the school's insurer when that is relevant.

## **School Board Responsibilities**

The Board is responsible for governance oversight of the school's complaints management framework, ensuring it is fair, transparent and consistent with relevant legislative, regulatory and accreditation requirements in Queensland. The Board does not manage day-to-day complaints and is not a first point of contact for complaints, unless it is a complaint about a principal. The Board also maintains oversight of complaint trends, systemic issues and matters requiring governance-level attention.

The Board's responsibilities include:

- approving the school's Complaints Handling Policy and any subsequent amendments
- ensuring the complaints framework is appropriate, accessible and aligned in-principle with regulatory and accreditation expectations for independent schools in Queensland
- ensuring the complaints system supports compliance with relevant legislative and accreditation obligations, and enables appropriate oversight of risk and governance matters
- maintaining a clear separation between its governance oversight and the School's operational complaint handling to ensure the Board is not involved in routine complaint resolution (unless the complaint is about a principal)
- monitoring complaints data and registers to identify trends, systemic issues and matters relevant to school improvement, risk management and strategic planning
- ensuring complaints are managed with procedural fairness, independence and appropriate escalation pathways
- receiving and overseeing complaints about a principal (see definition)
- appointing a Board member or Board sub-committee to manage, oversee or investigate complaints involving a principal and ensuring independence and procedural fairness
- hearing or determining appeals or reviews of complaints that have been managed through the school's internal complaints process, where escalation to Board level is provided for under this policy
- receiving assurance from the School that complaints are being managed in accordance with this policy and in line with principles of procedural fairness, confidentiality and relevant regulatory expectations.

## **All Parties to a Dispute**

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

- comply with the school's Complaints Handling Policy and Procedure
- provide complete and factual information in a timely manner
- lodge the complaint as soon as possible after the issue arises
- provide complete and factual information in a timely manner
- not provide deliberately false or misleading information
- not make frivolous or vexatious complaints or retaliatory complaints
- act in good faith and maintain a mutually beneficial relationship of trust and cooperation

- act in a calm, courteous and non-threatening manner
- acknowledge that a common goal is to achieve an outcome acceptable to all parties
- recognise that all parties have rights and responsibilities which must be balanced
- maintain and respect the privacy and confidentiality of all parties
- not victimise or act in reprisal against any party to the dispute or any person associated with them.

### **Employees Receiving Complaints**

Employees receiving complaints have the following role and responsibilities:

- act in accordance with the school's Complaints Handling Policy and Procedure
- refer the complainant to the school's Complaints Handling Policy and provide additional information as necessary
- maintain confidentiality as far as possible
- keep appropriate records
- forward complaints to a principal (or delegate) if the complaint cannot be resolved at the initial level or if it involves serious issues that require the involvement of a principal (or delegate)
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

### **Implementation**

Compass Independent School is committed to raising awareness of the process for resolving complaints at the school, including by the development and implementation of this policy, and via the clear support and promotion of this policy which is available on the school's website.

Compass Independent School is also committed to appropriately training relevant employees on how to resolve complaints in line with this policy and procedure.

### **Complaint register**

Compass Independent School will maintain a digital school complaint register with details such as the date, source and description of complaints, the employee managing the complaint, the actions taken, outcome and the date the complaint was closed.

All complaints shall be entered onto the complaint register as soon as practicable after the complaint is received.

To safeguard privacy, confidentiality and maintain the integrity of the complaint process, the school complaint register will be stored in a secure drive with access limited to a principal/s (or delegate) and directors of the School Board.

The school's complaint register will not contain complaints about a principal; these complaints will be maintained by the board, with access restricted to the Board.

A principal or School Board member may authorise the sharing of specific, relevant entries from the school or board complaint register with other designated staff members, provided measures are taken to protect the confidentiality of all parties involved, particularly ensuring that respondents to a complaint do not gain inappropriate access to information about the allegations against them.

*1 Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3*

*2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)*

*3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)*

Where a complaint is about a principal, the Board will also maintain a separate register/record in the Board's meeting papers/minutes.

*1 Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3*

*2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)*

*3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)*

## Part B: Complaints Handling Procedure

### 1. Lodging a Complaint

a) Complaints can be lodged with the most appropriate staff member at the local level, for example, the initial contact point for many complaints is the child/young person's relevant classroom teacher.

b) Complaints about the principal must be lodged with the Board. Before lodging a complaint with the Board, please refer to *Complaints about a staff member* in the Definitions section of this Policy and Procedure to ensure your complaint falls within the scope of matters to be addressed under this process.

Steve Richards (Chair): [srichards@compassindependentschool.com](mailto:srichards@compassindependentschool.com)

Kim Summers (Secretary): [kim@compassindependentschool.com](mailto:kim@compassindependentschool.com)

Nicci Beardmore (Treasurer): [treasurer@compassindependentschool.com](mailto:treasurer@compassindependentschool.com)

Shaun Nykvist (Director): [snykvist@compassindependentschool.com](mailto:snykvist@compassindependentschool.com)

Alicia Gilbert (Director): [alicia@compassindependentschool.com](mailto:alicia@compassindependentschool.com)

c) Complaints can be lodged through various methods, including

i. Phone

ii. Email

iii. In-person (by appointment)

d) If the complainant is unsure where to direct their complaint, they can contact the school's administration office for guidance.

e) If the complainant is uncomfortable directing the complaint to the most appropriate member at the local level, or wants to make a formal complaint, they can submit a complaint in writing to a principal, or, in the case where the complaint is about the principal, to the Board.

f) Where an anonymous complaint is lodged, the school will follow the complaints handling policy, when there is sufficient information to do so.

<sup>1</sup> Standards Australia, *Guidelines for complaint management in organizations (ISO 10002:2018, NEQ)*, s.4.3

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

<sup>3</sup> Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

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

a) The staff member receiving the complaint will:

- i. acknowledge the complaint within five (5) school days, outlining the next steps and where possible the estimated timeframes.
- ii. using the definitions of informal and formal complaints in this policy, determine and advise the complainant whether the matter can be resolved through the informal/local resolution process or whether it should proceed directly to the formal complaints process.

## **3. Registration and Support**

a) To maintain privacy of the register, a principal or principal's delegate will promptly enter received complaints onto the complaints register, regardless of whether it proceeds through the informal or formal process. In the case of complaints about a principal, a Board member will enter the complaint into the Board's register.

b) The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.

c) If a child/young person is a complainant, respondent or victim, or the child/young person of a complainant, respondent or victim of a matter being managed through this policy, the school may offer the child/young person support where appropriate e.g. discussing suitable adjustments with parents/caregivers.

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

a) The informal process is designed to resolve issues promptly and collaboratively at the local level.

b) It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s).

c) If all parties agree that the complaint is resolved informally, the process concludes.

d) If the complaint cannot be resolved informally, it will be escalated to the formal complaint process. Examples of unresolved informal complaints may include:

- acknowledgement of the complaint/concern not received (within five (5) school days)
- the complainant remains dissatisfied after engaging in discussion with the relevant person
- after discussion, the complaint/concern appears to be more serious (safety, misconduct, repeated pattern)
- information comes to light during the informal process that the complainant feels aligns with a complaint about a staff member (see definition).

## 5. Formal Complaints Handling Process

a) The formal process begins with the assessment of the complaint by a designated staff member/s or by a designated board member/s in the case of a complaint about a principal.

b) The person/s may gather additional information through investigation, interviews or evidence review. The designated person/s may consult with appropriate members of the child or young person's or the family's community.

c) The designated person/s will determine appropriate action, which may include:

- . Mediation
- . Disciplinary measures
- . Implementation of policy changes
- . Referral to external agencies
- . Provision of written updates to the complainant throughout the process
- . Other actions as determined as appropriate in the circumstances.

d) Estimated timeframes will be provided in the **Acknowledgement, Assessment and Referral** stage (see 2 above) and will be updated throughout the process as appropriate.

e) For formal complaints lodged with the Board, the Board Chair will acknowledge receipt of the complaint then determine with other relevant members of the Board the required steps to manage the formal complaint including recognising the roles and obligations of all parties under this Policy.

## 6. Complaint Closure

a) The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome.

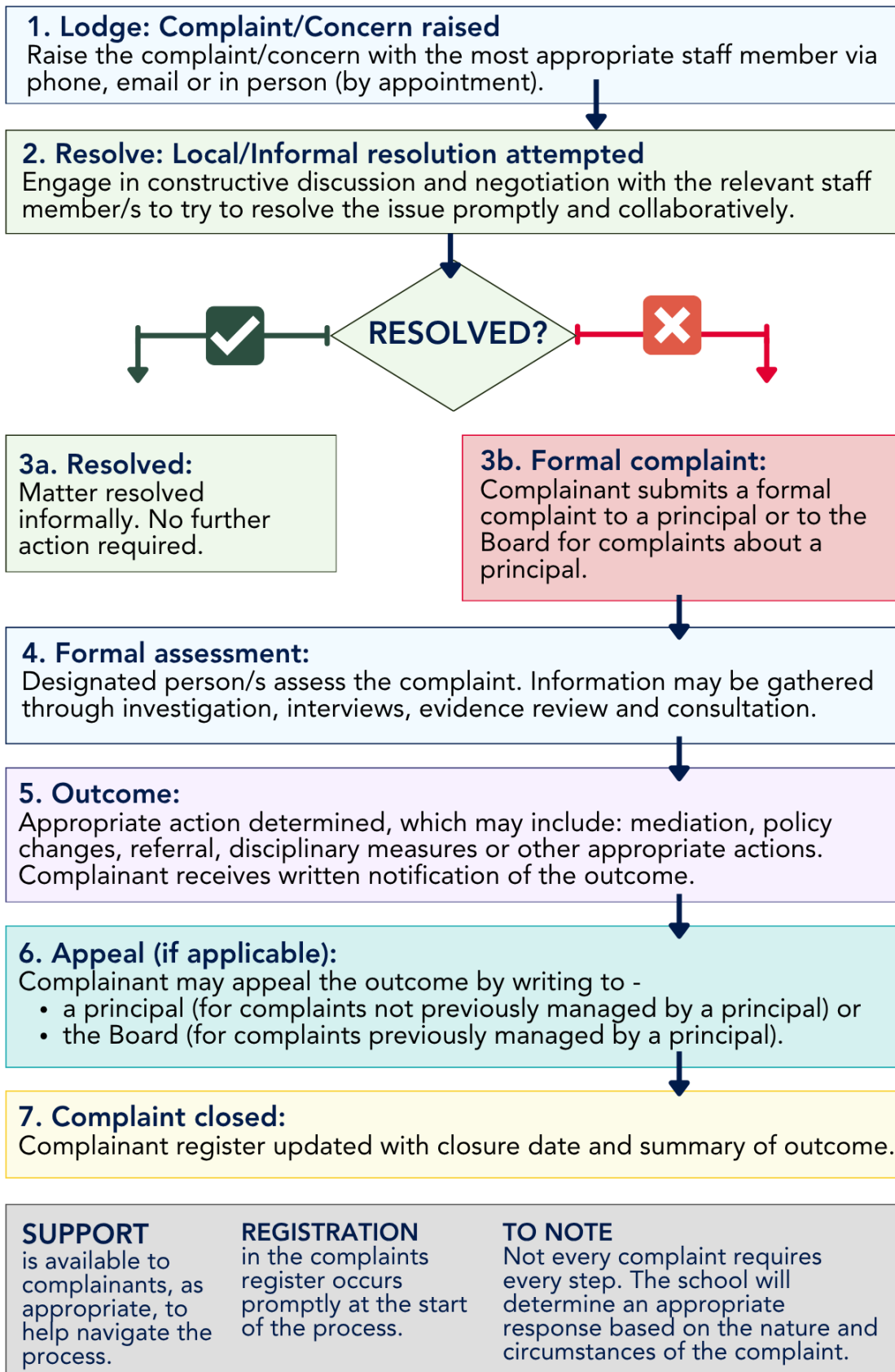
b) The complainant will receive written notification of the outcome and any actions taken where appropriate in response to formal complaints.

## 7. Appeals Process

a) Complainants may appeal the outcome of a complaint by writing to:

- i. a principal (for complaints not previously managed by a principal)
- ii. the Compass Board via post or email (for complaints previously managed by a principal, or complaints about a principal).

Appendix A: Complaints Handling Procedure Chart



1 Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3  
 2 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)  
 3 Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)