

## **Complaint Management Framework Policy and Procedure (NSC020)**

### **Introduction**

We welcome your feedback about the services of Nautilus Senior College.

We strive to provide quality educational services and would appreciate learning about our efforts. To this end, your comments about what works well is always appreciated. It can be more challenging however to receive information about experiences that have been found to be less favourable and sometimes adverse. However, it is most important that this information is shared with us as we can only improve the quality of our services if we receive this important feedback.

Of particular concern are complaints or feedback regarding the welfare, safety and well-being of our students or other children especially allegations of reportable conduct.

**Reportable conduct** is defined as:

any sexual offence or sexual misconduct committed against, with or in the presence of a child (including a child pornography offence or an offence involving child abuse material);

- a) any assault, ill-treatment or neglect of a child; and
- b) any behaviour that causes psychological harm to a child whether or not, in any case, with the consent of the child.

These complaints should be directed to the Principal or Chief Executive Officer immediately. For more details about reportable conduct, please refer to our NSC014 Child Protection Policy Framework. In summary, our approach to receiving complaints is summarised below:

#### ***Enabling Complaints:***

We are committed to empowering people to share their experiences and impressions. This means that we strive to make the process of providing feedback as easy as possible, knowing that this at times requires courage and trust.

#### ***Responding to complaints:***

You will be treated respectfully when you provide your feedback. Information will be available so that you are clear about how the information provided may be used and what outcome you may expect as a result of providing us with your information.

#### ***Accountability and Learning:***

The feedback that you provide may contribute to the future development of the College.

This document consists of three important documents to guide our management of complaints:

### **1. Complaint Management Framework**

The framework summarises the processes and general principles that guide the development of complaint management systems at the College;

## 2. Complaint Management Policy

The Complaint Management Policy provides a general overview of the complaint management principles applied at the College.

## 3. Complaint Management Decision-Making Flow Chart

The Complaint Management Decision-Making Flow-chart provides a summary of the decision-making that informs the effective management of complaints.

## Complaint management framework

The Complaint Management Framework summarises the processes and general principles that guide the development of complaint management systems of the College.

### 1. Enabling Complaints

Building a culture that invites feedback

Making sure that people have access to the complaint management process and are supported if they need help

Providing guidance in a range of forms

Removing known impediments

### 2. Responding to Complaints

Ensuring that resources are in place so that we are responsive to complaints when they are received

Assessing the complaint to determine an appropriate course of action

Identifying and managing risks

Supporting stakeholders during the response process

Reporting complaint information as required

Engaging professional services as required

### 3. Accountability and Learning

Maintaining effective complaint record-keeping systems

Using feedback to inform planning and decision-making

Sharing complaint information when required

## Complaint management policy

### Introduction

#### Context and Purpose

This policy provides direction on fair, effective and efficient management of complaints received by Nautilus Senior College.

The complaint management processes and systems of the College are intended to:

- enable the College to respond to issues raised by people making complaints in a timely and effective way
- build confidence in our administrative process, and
- inform our future decision-making, policy development and planning.

#### Scope

This policy applies to all activities and services of Nautilus Senior College.

#### Statement of Commitment

Nautilus Senior College is committed to enabling people to provide feedback about their experience of our services by:

- Promoting a culture that values complaints, and their effective resolution
- Maintaining effective complaint management systems
- Empowering people to engage in our complaint management processes
- Engaging in ongoing review and development of our complaint management systems and processes
- Demonstrating respect for people who provide feedback about the College

### Terms and definitions

#### *Complaint*

Expression of dissatisfaction made to or about us, our services, staff or students.

A complaint covered by this Policy can be distinguished from:

- staff grievances
- requests for information.

#### *Complaint management system*

All policies, procedures, practices, used by us in the management of complaints.

#### *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.

#### *Grievance*

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

### *Policy*

A statement providing guidance on how we should fulfil our goals in accordance with our vision and mission.

### *Procedure*

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

### *Reportable conduct*

- a) any sexual offence or sexual misconduct committed against, with or in the presence of a child (including a child pornography offence or an offence involving child abuse material);
- b) any assault, ill-treatment or neglect of a child; and
- c) any behaviour that causes psychological harm to a child whether or not, in any case, with the consent of the child.

## Complaint Management Systems

Nautilus Senior College has devised effective complaint management processes that support our commitment to continuous improvement in complaint management.

When we receive a complaint about the College you will be kept informed about what you can expect to happen as a result of bringing forward your complaint.

Our approach to receiving complaints is summarised as follows:

### Enabling Complaints

We are committed to empowering people to share their experiences and impressions. This means that information will be available to make the process of providing feedback as easy as possible, knowing that this at times requires significant courage and trust.

### 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 and will strive to gather information about the issues raised where there is enough detail available to progress the complaint. In circumstances where there is insufficient information available to progress the complaint, the anonymous information will be logged and recorded.

### Accessibility

We will ensure that information about how and where complaints may be made is well publicised. 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, another organisation).

#### Responding to complaints

People will be treated respectfully when they register a complaint in Nautilus Senior College. Information will be available to people who make a complaint so that they are clear about how the information provided may be used and what outcome they may expect as a result of providing us with information related to the complaint.

#### Early resolution

Where possible, complaints will be resolved at first contact with College.

#### Responsiveness

We will promptly acknowledge receipt of complaints.

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 complaint management process
- the expected timeframe for our response
- the progress of the complaint at critical stages
- 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 timeframes 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.

The person handling the complaint will be different from any staff member whose service or conduct is being complained about. Conflicts of interests, whether actual or perceived, will be managed responsibly.

#### Responding flexibly

Our staff will strive to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches 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 appropriate. Personal information that identifies individuals will only be disclosed or used as permitted under the relevant privacy laws, and any relevant confidentiality obligations.

## Allegations of Reportable Conduct

Reportable conduct is defined as:

- a) any sexual offence or sexual misconduct committed against, with or in the presence of a child (including a child pornography offence or an offence involving child abuse material);
- b) any assault, ill-treatment or neglect of a child; and
- c) any behaviour that causes psychological harm to a child whether or not, in any case, with the consent of the child.

These complaints should be directed to the Principal or Chief Executive Officer immediately. When you make a complaint of this kind, support will be made available to you and we will respond in writing acknowledging receipt of your complaint.

For more details about reportable conduct please refer to our Child Protection policy suite.

## Training of staff

All staff managing complaints undertake training to ensure that they have the capacity to implement our complaint management system.

## Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control.

We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- how serious, complicated or urgent the complaint is
- whether the complaint raises concerns about people's health and safety
- how the person making the complaint is being affected
- the risks involved if resolution of the complaint is delayed, and
- whether a resolution requires the involvement of other organisations.

## Addressing complaints

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- give the person information or an explanation
- gather information from the person or area that the complaint is about, or
- investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress particularly if there are any delays.

We will also communicate the outcome of the complaint management process. The actions we decide to take will be tailored to each case and will take into account any statutory requirements.

#### Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised (if appropriate), we will contact the person making the complaint and advise them of:

- the outcome of the complaint and any action we took
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

#### Closing the complaint, record keeping, redress and review

We will keep records about:

- how we managed the complaint
- the outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- any outstanding actions that need to be followed up.

We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

#### A Note on Whistleblowing

When a disclosure of serious wrong-doing is made regarding of a person who holds a senior decision-making role in an organisation this is known as whistleblowing.

The integrity of the services offered by Nautilus Senior College and its reputation in the community is seriously compromised if a person in a senior decision-making is involved in wrong-doing. It is therefore expected that all employees know how to respond if they observe or receive information about such conduct. Failure to comply with this expectations is regarded as a serious misdemeanour.

To make a disclosure about serious wrongdoing of a senior employee of the College can be very challenging for an individual. For this reason support services are in place for people who make whistleblowing disclosures.

When making whistleblowing disclosures the College aims to achieve the following:

- Protect individuals who, in good faith, report wrongdoing which they reasonably believe to be corrupt, illegal or unethical on a confidential basis, without fear of reprisal, dismissal or discriminatory treatment.
- Assist in ensuring that matters of wrongdoing and/or unethical behaviour are identified and dealt with appropriately.

- Establish procedures that enable:
  - protection for those that make serious wrongdoing disclosures
  - independent inquiry/investigation of disclosures made
  - resolution of the issue(s) identified.

## Accountability and Learning:

### 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.

### Monitoring of the complaint management system

We will continually monitor our complaint management system to:

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

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts

### Continuous improvement

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

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

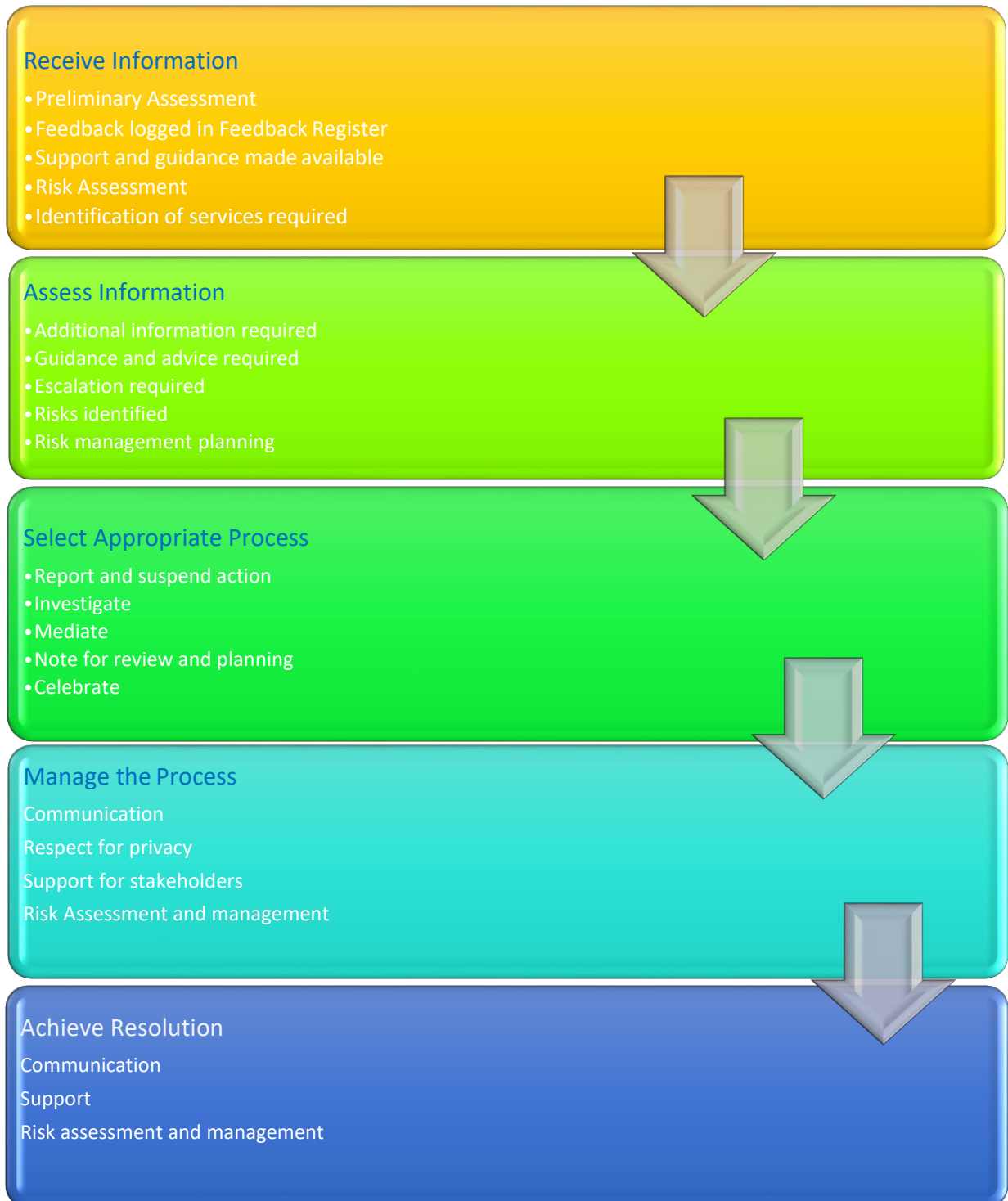
## Acknowledgements

The development of this policy has been informed by the following:

- Australian and New Zealand Standard *Guidelines for complaint handling in organizations* AS/NZS 10002:2014
- NSW Ombudsman *Complaint Management Framework and Model Policy*, June 2015
- Ombudsman Western Australia *Guidelines on complaint handling*, November 2010



## Attachment A: Complaint Management Decision-making Flowchart



## Attachment B: Suggestions and complaints process

