

## Complaint Management Framework Policy & Procedure

Policy Number: SAS020

<b>Registered Entity</b>	Nautilus Senior College
<b>Policy Number</b>	SAS020
<b>Version</b>	6.0
<b>Policy Name</b>	Complaint Management Framework Policy and Procedure
<b>Compliance Standard</b>	3.6 Safe and Supportive Environment Management and Operation - General
<b>Date created</b>	11/5/2018
<b>Approved by / Date</b>	CEO under delegation / 26/6/2023
<b>Privilege level</b>	Public
<b>Date for next review</b>	June 2025
<b>Related Policies/Procedures</b>	SAS003 Withdrawal of Enrolment Policy and Procedures SAS014 Child Protection Policy and Procedure SAS017 Student Discipline and Procedural Fairness Policy
<b>Related Documents</b>	NSC Student and Staff Handbooks Feedback and Complaints Form (web and hardcopy)

This Policy applies to Mid North Coast Community College (MNCCC) and its trading arms.

### 1. Introduction

At MNCCC we offer a range of important services to young people in our local area. We need your feedback about the service we offer, so that we can learn about what you like and what we can do better. We see members of the community as important partners in the work that we do, and we value your feedback.

We strive to provide quality services and we are committed to continuous improvement. While your input about what works well is always appreciated, we are also interested in receiving complaints or concerns about our service delivery as we can only improve the quality of services if we receive this important feedback.

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## 2. Complaint Management Framework

The MNCCC Complaint Management Framework is intended to:

- enable MNCCC 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.

This Framework summarises the processes and general principles that guide the development of complaint management systems of MNCCC.

The key principles that guide the management of complaints are set out 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 provided may contribute to the review and development of our systems and processes, training and planning. The Board of Governance of the College is provided with information about feedback received which contributes to the oversight role it assumes.

These principles are described in further detail in the diagram below:

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### 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

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### 3. Complaint Management Policy

#### 3.1. Statement of Commitment

MNCCC 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 MNCCC.

#### 3.2. 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
- Reports to external authorities.

##### *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.

##### *Reportable conduct*

Reportable conduct is defined in the *Children’s Guardian Act 2019 (NSW)* and means certain defined conduct that requires notification to the NSW Office of the Children’s Guardian, as outlined below:

- a) a sexual offence,
- b) sexual misconduct,
- c) ill-treatment of a child,
- d) neglect of a child,
- e) an assault against a child,
- f) an offence under section 43B or 316A of the *Crimes Act 1900 (NSW)*,
- g) behaviour that causes significant emotional or psychological harm to a child.

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## 4. Complaint Management Guidelines

### 4.1. 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 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 (e.g., advocate, family member, legal or community representative, another organisation).

### 4.2. Responding to complaints

People will be treated respectfully when they register a complaint at MNCCC. Information will be circulated about the complaint management process so that there is clarity 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.

#### *Complaint resolution*

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

#### *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 the complainant 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.

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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 law including the relevant privacy laws, and any relevant confidentiality obligations.

*Allegations of Reportable Conduct*

Where an allegation of reportable conduct is made against an employee, contractor or volunteer, it should be directed to the Principal, any complaint regarding the Principal should be directed to the Chief Executive Officer (CEO) and any complaint about the CEO should be directed to the Chair of the Board, 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 allegations of reportable conduct, please refer to the SAS014 Child Protection Policy and Procedures

*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.

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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.

**4.3. 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 and 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.

*Whistleblowing*

MNCCC 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. Please review the MNCCC Whistleblowing Policy for further information.

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## 5. 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.

## 6. Nautilus Senior College Complaints

As a registered non-government school, Nautilus Senior College (covering all campus locations) is committed to providing a safe and supportive environment for its students and complies with legislative requirements in relation to child protection.

Complaints or feedback regarding the welfare, safety and well-being of our students or other children are given our highest priority. This includes any allegation of 'reportable conduct' as defined in the *Children's Guardian Act 2019 (NSW)*. Allegations of reportable conduct include certain allegations (see definition at section 3.2) made against employees, contractors or volunteers towards a child or group of children.

Complaints of this nature should be immediately directed to the Principal or Chief Executive Officer in accordance with the SAS014 Child Protection Policy and Procedures. For more details about reportable conduct, please refer to the Child Protection Policy Framework.

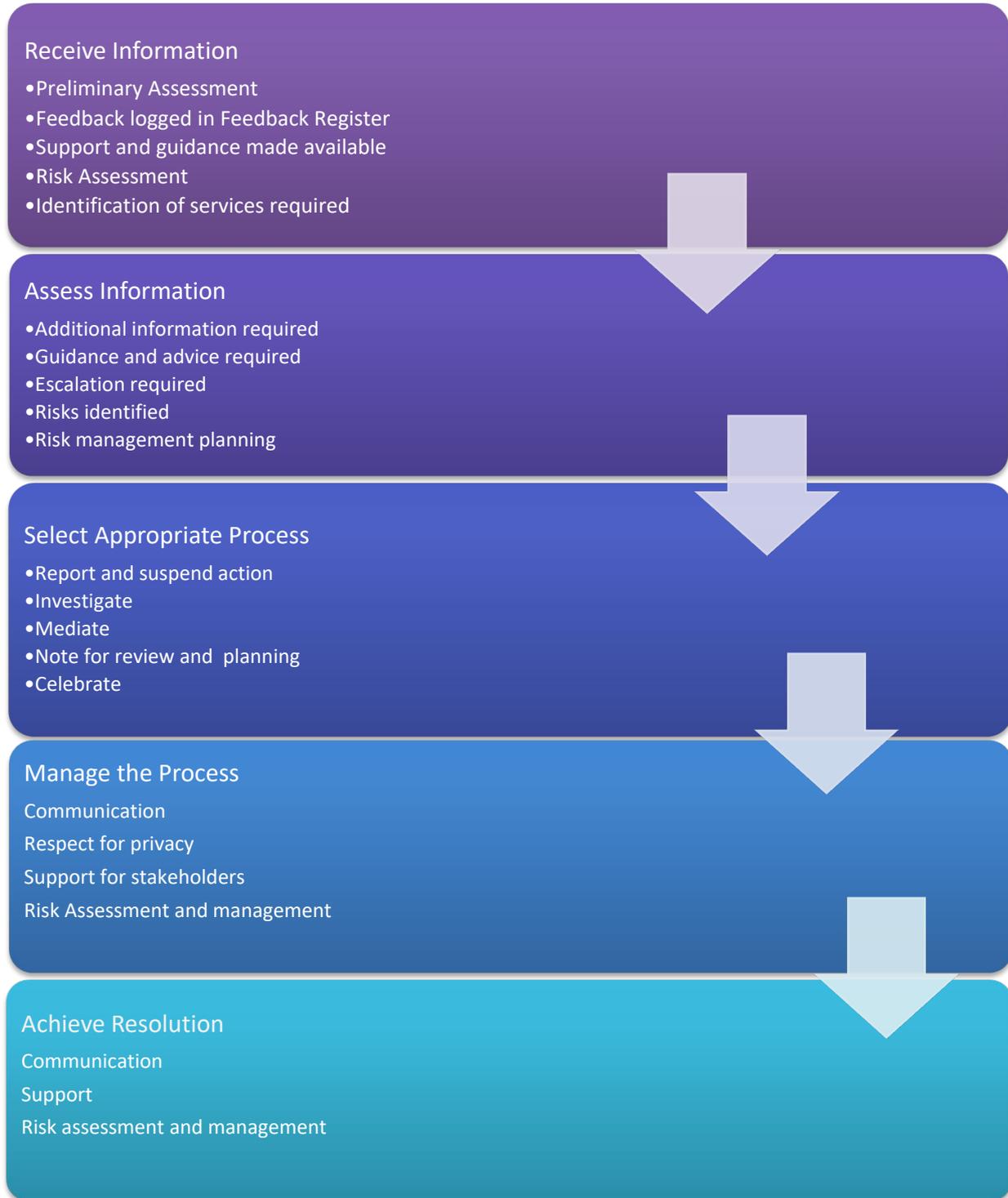
## 7. Acknowledgements

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

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**8. Attachment A: Complaint Management Decision-making Flowchart**



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## 9. Version History

Version No.	Implemented By	Revision Date	Approved By	Approval Date	Reason
1	V Byrnes	13/04/2018	V Byrnes	11/05/2018	
3.1	V Byrnes	08/08/2017	Board	9/10/2017	
4	P Davis/ C Parkin	11/03/2019	V Byrnes	15/03/2019	Complete re-write, formatting and addition of procedural flowcharts
5	John Beaumont	18/1/2021	V. Byrnes	12/2/21	Slight amendments and corrections
6.0	Integro Partners	31/5/2023	V Byrnes	26/6/23	Review against regulation and legislation changes

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