

POL06 Complaints Policy

Purpose of this Policy

The purpose of this policy is to provide written processes about receiving, assessing, investigating and otherwise dealing with complaints¹.

Scope

Students, parents and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements and community members.

Related Legislation and BIS Documents

Education (Accreditation of Non-State Schools) Regulations 2017

Fair Work Act 2009 (Cth)

Work Health and Safety Act 2011 (Qld)

Privacy Act 1988 (Cth)

Anti-Discrimination Act 1991 (Qld)

Australian Human Rights Commission Act 1986 (Cth)

Sex Discrimination Act 1984 (Cth)

Age Discrimination Act 2004 (Cth)

Disability Discrimination Act 1992 (Cth)

Racial Discrimination Act 1975 (Cth)

Standards Australia, Guidelines for complaint management in organisations (ISO100002:2022 NEQ)

CO01 Constitution

BL01 Bylaws

POL01 Anti Discrimination Policy

POL03 Relationship Based Behaviour Management Policy

POL04 Management Committee Code of Conduct

POL14 Privacy Policy

POL16 Sexual Harassment Policy

POL18 Workplace Bullying Policy

POL19 Workplace Health and Safety Policy

POL20 Child Protection Policy

POL21 Enrolment Contract

¹ Education (Accreditation of Non-State Schools Regulations 2017 (s.7)

POL22 Employment Teacher
POL23 Employment Teacher Aide
POL27 Disability Discrimination Policy
POL33 Staff Code of Conduct Policy
M05 Current Parent Handbook
GL12 Bullying Response Guidelines
GL17 Whole School Rules Guidelines
PRO05 Bullying Response
PRO06 Complaints Handling Procedure
F04 Complaint Form: Resolution Request
F04 Complaints Register
F05 Complaints Handling Tracking Form
F17 Bullying Report
F18 Behaviour Incident Form

Definitions

- **The School** – Brisbane Independent School Inc.
- **The Management Committee** – The Board of the Brisbane Independent School Inc.
- **Lodgement** – submitting an application or form for consideration
- **Confirmation** – written verification that the relevant step in the process is conclude
- **Complaint** – AN expression of dissatisfaction made to or about the school, related to the school's services, staff or the handling of the complaint, where a response or resolution is explicitly or implicitly expected or legally required².
- **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 quite 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 the principal or an informal complaint that could not be resolved informally. Assessment of the complaint is required by the Management Committee Chair.
- **Complainant** – The person, organisation or their representative making a complaint³
- **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.

² Standards Australia, Guidelines for complaint management in organisations (ISO100002:2022 NEQ) (s.4.3)

³ Standards Australia, Guidelines for complaint management in organisations (ISO100002:2022 NEQ) (s.4.2)

Change Register and Review Schedule

As a Policy this document is owned by the Brisbane Independent School Inc. Management Committee. Any changes to this document must be authorised by a Management Committee Meeting or as delegated by the Management Committee.

Document control is maintained by ensuring that Versions are saved by each person who has changed the document using the format - Author, yyyyymmdd, description of the change

- Annual
- Next Date: July 2025
- Review responsibility sits with: The Management Committee

Change Register			
Document Version	Change Description	Authorised By	Date Implemented
1.0	Policy Development	Management Committee/ J. Haynes. Principal/L. Bowie	2022/05/19
1.1	F04 converted from Google Form to Google Document (pdf for public).	Management Committee/A. Scown Principal/L. Bowie	2022/08/29
1.2	Policy review	Management Committee/S. Eastwell Principal/L. Bowie	2023/09/19
1.3	Policy update re: Standards Australia, Guidelines for complaint management in organisations (ISO100002:2022 NEQ)	Management Committee/A. Scown Principal/L. Bowie	2024/07/30

Rationale

As BIS is working within an Integral Philosophical perspective a quadrant analysis is used to highlight the relevant perspectives on this topic.

Upper Left - Individual's Experience	Upper Right - Individual Behaviour
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<ul style="list-style-type: none"> • Different people have varying experiences of conflict, not everyone feels able to talk about things • Memories of prior experiences can cloud judgement or impact on resolution • People often come with an assumption that BIS doesn't want feedback, as that has been their prior institutional experience 	<ul style="list-style-type: none"> • People may avoid coming onsite in tense situations • Staff may not join in with staff discussions • People may keep their head down
<p>Lower Left - Community Experience</p> <ul style="list-style-type: none"> • BIS often believes that everyone thinks the same thing but really there are lots of different perspectives • The BIS Values highlight the core principles for us to follow • BIS has a history of disruptions when the center of belief in the school changes from one to another; keep an eye out for this • The school survey provides a longitudinal view as do the life members 	<p>Lower Right - Community Behaviour</p> <ul style="list-style-type: none"> • Only including certain people in conversations and in positions of power can reduce feedback • Timely reporting of the Annual survey • Management Committee presence at WCMs to allow members to talk directly with the Board members • Refusing to hear complaints can make it easier to pretend that everything is fine; search them out. • Read "How the way we talk can change the way we work" - complaints tell you what matters to people

BIS is committed to providing high quality education and the wellbeing of its students, staff and the broader BIS community is central to ensuring that outcome. Adherence to wellbeing guidelines in addition to legislative reporting requirements helps to ensure the best support is provided to individuals and the ongoing health of the BIS community.



Brisbane Independent School has a strong set of Values that underpins all that we do and provides some core values in relation to how to handle challenges to the balance of individual freedom versus the needs of the wider society. A key test to always ask ourselves is to follow the Values Progression that moves from the Individual to the Community to the Wider Society:

- Has the decision erred on the side of Courageous Learning?
- Has the decision balanced both Freedom and Responsibility?
- Has the decision considered the impact on the individuals involved and their needs?
- Has the decision considered the impact on the needs of our community?
- Has the decision considered the needs of the external laws and values that guide our society, with the safety of the school at the centre of the discussion - we must follow the law.

Policy

The School acknowledges the right of students, parents and employees to complain when dissatisfied with an action, inaction or decision of the school and the school encourages constructive criticism and complaints.

Brisbane Independent School is committed to ensuring that complaints are dealt with in a responsive, efficient, and effective and fair way.

The School recognises that time spent on handling complaints can be an investment in better service to students, parents/guardians and employees and views complaints as part of an important feedback and accountability process.

Complaints Handling Principles

Brisbane Independent School is committed to managing complaints according to the following principles (which includes principles of procedural fairness):

- The complaint will be handled from a BIS Values perspective (refer to rationale);
- complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe;
- complaints will be resolved with as little formality and disruption as possible, having regard to the nature of the complaint;
- 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;
- confidentiality and privacy will be maintained as much as possible;
- Victimising behaviour towards a complainant, respondent or other people associated with the complaint, will not be tolerated;
- Complainants that lodge a complaint on reasonable grounds will not suffer any other reprisals on the basis of lodging the complaint.

Complaints that may be Resolved under this Policy

Brisbane Independent School encourages anyone who feels impacted by an issue involving the school to file a complaint. Complaints can address matters such as:

- the school, its Management Committee, its employees or students having done something wrong;
- the school, its Management Committee, its employees or students having failed to do something they should have done;
- the school, its Management Committee, its employees or students having acted unfairly or impolitely;

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- issues of Management Committee, employee or student behaviour that are contrary to their relevant code of conduct, including inappropriate staff conduct as reported by a student⁴;
 - issues related to learning programs, assessment and reporting of student learning;
 - issues related to communication with students or parents or between employees;
 - issues related to school fees and payments;
 - general administrative issues; or
 - Issues relating to non-compliance with a process outlined in school policies or procedures, for example POL20 Child Protection Policy, POL01 Anti-Discrimination Policy or POL14 Privacy Policy⁵.

Student complaints may be brought by students or by parents on behalf of their children, 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 or risks of harm to children should be dealt with in accordance with the law and the school's **POL20 Child Protection Policy**;
- Student bullying complaints should be dealt with under the **POL03 Relationship Based Behaviour Management or POL18 Workplace Bullying Policy**;
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the **POL03 Relationship Based Behaviour Management**;
- Student or employee violence or criminal matters should be directed to the Principal who will involve the Police as appropriate;
- Disputes between Management Committee members, between Association members and Management Committee members or Association members should be dealt with in accordance with **STD03 Bis Values** and **CO01 Constitution**;
- Matters relating to Public Interest Disclosures pertinent to **POL32 Whistleblower Policy**;
- Formal legal proceedings should be managed as appropriate in the circumstances;
- Employee complaints related to their employment should be directed to their supervisor.

⁴ Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

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



Brisbane Independent School Inc.

Author: Management Committee

This Version: 2024/07/30

Next Review: July 2025

Authorised: Management Committee

Policy Owner: Management Committee

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Responsibilities

School

The school has the following role and responsibilities:

- develop, implement, promote and act in accordance with the school's Complaints Handling Policy and procedures;
- appropriately communicate the school's Complaints Handling Policy and procedures to students, parents and employees;
- ensure that the Complaints Handling Policy and procedures are readily accessible by staff, students and parents;
- upon receipt of a complaint, manage the complaint in accordance with **PRO06 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;
- keep records;
- conduct a review/audit of the **Complaints Register** in regular intervals;
- monitor and report to the governing body on complaints;
- report to the school's insurer when that is relevant; and
- refer to the school's governing body immediately any claim for legal redress.

All Parties to a Dispute

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

- apply and comply with the school's Complaints Handling Policy and procedures;
- provide complete and factual information in a timely manner;
- not provide deliberately false or misleading information;
- not make frivolous or vexatious 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; and

- not victimise or act in reprisal against any party to the dispute or any person associated with them.

Employees Receiving and/or Managing Complaints

Employees receiving complaints have the following role and responsibilities:

- act in accordance with the school's Complaints Handling Policy and procedures;
- Refer the complainant to the school's Complaints Handling Policy and procedures and provide additional information as necessary;
- maintain confidentiality as far as possible;
- keep appropriate records;
- forward complaints to more senior employees, including the Principal, as appropriate and in accordance with **PRO06 Complaints Handling Procedure**;
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

Implementation

The 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 related procedures, and via the clear support and promotion of the policy and procedures. This policy is publicly available on the school website and discussed as a part of the onboarding process for new staff and families.

The School is also committed to appropriately training relevant employees (especially senior staff and Management Committee members) on how to resolve complaints in line with this policy and the related procedures.

F04 Complaints Register

Brisbane Independent School will maintain F04 Complaint Register with details such as the date, source and description of complaints, the employee managing the complaint, the actions taken, outcomes and the date the complaint was closed.

F04 Complaint Register will be stored securely. To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire complaint register will be limited to the Principal.

The Principal may authorise the sharing of specific, relevant entries from F04 Complaint Register with other designated staff members (such as the senior leadership team), provided measures are taken to protect the confidentiality of all

parties involved, particularly ensuring that all respondents to a complaint do not gain inappropriate access to information about the allegations against them.

All complaints shall be entered onto F04 Complaints Register as soon as practicable after the complaint is received. The complaint register will not contain complaints about the Principal. Records of complaints about the Principal will be maintained by the Management Committee, with access restricted to the Management Committee.