

SOUTHERN CROSS
GRAMMAR

Complaints Handling Policy and Procedures

Policy Control Information

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Version	Date	Status	Approval	Summary of Changes
2.0	September 2026	Approved	Board	New policy replacing the Complaints and Grievances Policy; aligned with the School complaints framework and child safety requirements.
1.0	June 2022	Superseded	Board	Complaints and Grievances Policy.

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1. Purpose

This Policy and Procedures sets out Southern Cross Grammar's (the School's) approach to receiving, assessing, managing and resolving complaints. It is intended to provide a clear, accessible and fair process for students, parents, carers and members of the School community, and to support the School's commitment to student safety, wellbeing, accountability and continuous improvement.

The Policy is designed to ensure that complaints are taken seriously, responded to promptly and thoroughly, and managed in accordance with procedural fairness, privacy, applicable legal and regulatory obligations and the School's child safety framework.

2. Scope

This Policy applies to complaints made by students, former students, parents, carers, family members and other members of the School community or public about:

- the School, its operations, services, decisions or activities
- the behaviour or conduct of a staff member, volunteer, contractor, service provider, visitor, parent/carer, student or other person connected with the School
- a breach of a relevant School policy, procedure or code of conduct
- the School's response to, or management of, a concern or complaint.

Complaints may relate to conduct occurring on School premises, at School activities or events, in online or virtual School environments, or in other circumstances where there is a sufficient connection with the School.

Workplace grievances raised by employees are managed separately under the Internal Grievance Resolution Policy and Procedures. Child safety-related complaints are managed in conjunction with the Complaints Management (Child Safety) Policy and Procedures and the Reporting and Responding Obligations (Child Safety) Policy and Procedures. A complainant is not expected to determine which policy applies; the School will assess the information received and direct the matter to the appropriate pathway.

3. Policy Principles

3.1 Accessible, Child-Focused and Culturally Safe

The School will maintain complaint pathways that are accessible, child-focused, culturally safe and easy to understand. The School will:

- provide age-appropriate and accessible ways for students to raise concerns or complaints
- support students to participate in decisions that affect them, having regard to age, maturity, capacity and individual needs
- take reasonable steps to address communication, language, disability, cultural and accessibility needs
- recognise and respond appropriately to the needs of Aboriginal and Torres Strait Islander students and families, culturally and linguistically diverse communities, students with disability and other students who may experience barriers to making a complaint
- ensure that a person is not victimised or disadvantaged because they make, support or participate in a complaint.

3.2 Fairness, Respect and Confidentiality

Complaints will be managed in a manner that is fair, respectful, proportionate and responsive to the nature and seriousness of the matter. The School will apply procedural fairness where a complaint may result in an adverse finding or decision about a person.

- complaints will be considered objectively and without unreasonable delay
- the person managing the complaint must be appropriately impartial and manage any actual, potential or perceived conflict of interest
- affected persons will be given a reasonable opportunity to understand and respond to relevant allegations before an adverse finding is made, subject to safety, legal and regulatory requirements
- information will be shared only with those who need it for the purpose of responding to the complaint, protecting safety, complying with law or administering the School's processes
- all parties are expected to communicate respectfully and in good faith.

4. Making a Complaint

Anyone may raise a concern or make a complaint. A complaint may be made in person, by telephone, by email or in writing. The School encourages concerns to be raised as early as possible so they can be addressed constructively and, where appropriate, resolved at the lowest appropriate level.

4.1 Students

A student may raise a concern or complaint at any time with any trusted adult at the School, including:

- a classroom teacher or Home Group teacher
- a Head of Year or Head of School
- a Child Safety Officer
- the School Psychologist, School Nurse or another member of the wellbeing team
- the Principal or any other staff member the student trusts.

The staff member will listen respectfully, take the concern seriously, explain the next steps and, where appropriate, help the student access additional support or refer the matter to the appropriate person for investigation.

Students who experience or witness racism, bullying, discrimination, harassment or any behaviour that makes them feel unsafe are encouraged to report it immediately to a trusted adult or through one of the reporting pathways above.

Students may also use the Anonymous Student Safety Report available through the Student Safety and Wellbeing page on Schoolbox, or ask a parent, carer or other trusted adult to raise a concern on their behalf. A student does not need to use particular words, complete a form or establish that something has occurred before the School will listen and consider what action is required.

4.2 Parents, Carers and Community Members

The School encourages parents, carers and members of the community to raise concerns as early as possible so they can be addressed promptly and constructively. Before raising a concern or complaint, it may be helpful to:

- clearly identify the issue or concern
- consider the outcome you are seeking
- recognise that you may not have all of the relevant information
- communicate respectfully and in good faith
- consider any relevant School policies or procedures.

A support person may accompany you to meetings. If you intend to bring a support person, please advise the School beforehand and provide their name and relationship to you.

The School can arrange reasonable support, including interpreter or translation services, where required to ensure our complaints process is accessible and inclusive.

Where appropriate, a parent, carer or community member should first raise a concern with the staff member closest to the matter, such as the relevant teacher, Head of Year or Head of School. Serious matters, matters involving a conflict of interest, or matters that are not suitable for local resolution may be raised directly with the Principal or an appropriate member of the School Executive.

A complaint may be made by contacting the School on (03) 8363 2000 or through the School's published contact channels. Complaints about the Principal should be directed to the Chair of the Southern Cross Grammar Board via board@scg.vic.edu.au.

4.3 Anonymous Complaints, Support and Accessibility

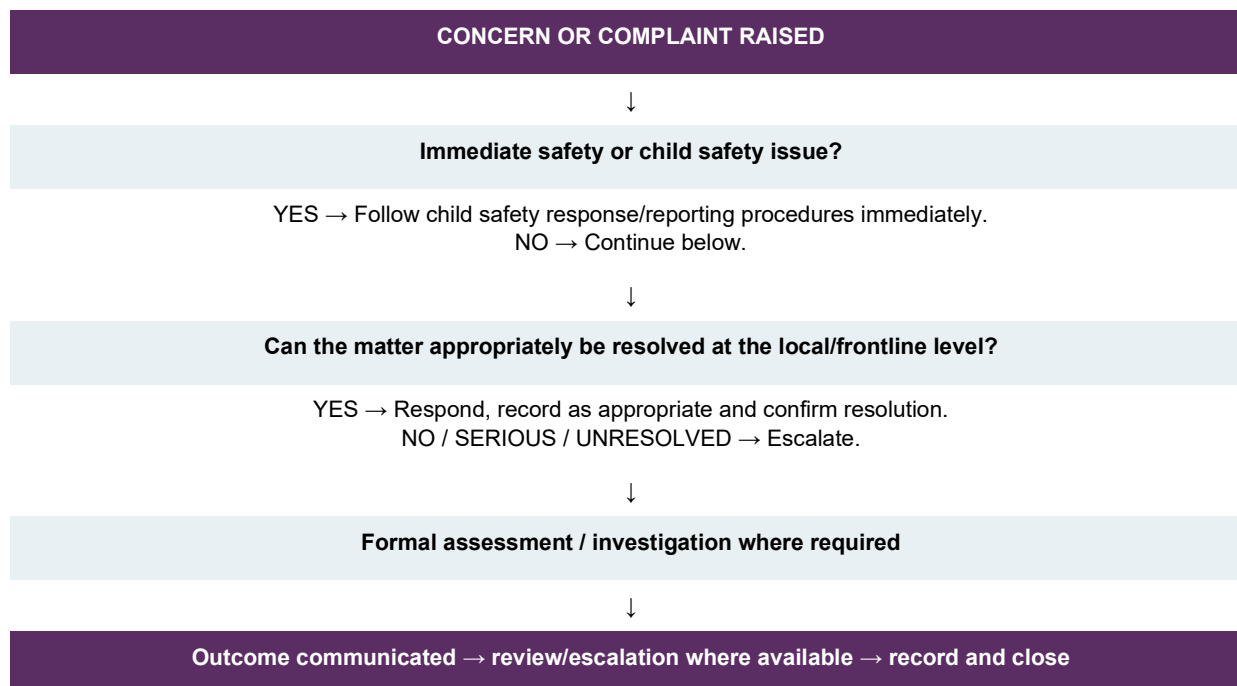
The School will accept anonymous or pseudonymous complaints. Anonymous complaints will be assessed and acted on where sufficient information is available, although anonymity may limit the School's ability to investigate fully or provide feedback about the outcome.

5. Complaints Handling Process

5.1 Initial Assessment and Pathway

The School will assess each complaint to determine its nature, seriousness, urgency, immediate safety needs, applicable policies and reporting obligations, and who is best placed to manage it. A straightforward concern may be resolved promptly by the staff member or leader closest to the matter. Serious, formal, disputed or unresolved complaints will be escalated.

Complaints will be managed in accordance with this Policy and, where applicable, the School's Complaints Handling Program. The Program provides more detailed internal procedures for complaint assessment, investigation, resolution, record keeping and continuous improvement.



5.2 Formal Complaints Handling Process

Where a formal response is required, the School will manage the complaint according to its nature, seriousness and urgency. The process may be adapted to the circumstances and not every complaint will require a formal investigation.

Step 1 – Acknowledgement

The School will ordinarily acknowledge receipt of a formal complaint within two (2) School days, where practicable.

Matters involving immediate safety, child safety or significant wellbeing concerns will be acted on without delay.

Step 2 – Assessment

The complaint will be assessed to determine:

- the nature and seriousness of the issues raised
- whether immediate protective, wellbeing or risk-management action is required
- who is best placed to manage or investigate the complaint
- whether a conflict of interest exists
- whether another School policy or procedure applies
- whether any statutory, regulatory or external reporting obligations arise.

Where a complaint raises a child safety incident, disclosure or concern, the School will immediately apply the child safety pathways described in section 5.3.

Step 3 – Investigation

Where investigation is required, the School will gather and consider relevant information. This may include:

- speaking with the complainant
- speaking with the person who is the subject of the complaint
- speaking with relevant witnesses
- reviewing relevant documents, records or other information
- seeking clarification or further information
- obtaining specialist advice where appropriate.

All parties will be afforded procedural fairness.

The School may appoint an appropriately qualified internal or external person to investigate, mediate, facilitate or review a matter where appropriate.

Step 4 – Response and Resolution

The School will determine an appropriate outcome having regard to the circumstances, the information available and any applicable privacy, confidentiality, employment or legal obligations.

Where appropriate, the School will communicate the outcome to the complainant and explain any next steps or review options.

The School aims to resolve formal complaints within 20 School days, where practicable. More complex matters may take longer. Where additional time is required, the complainant will be kept reasonably informed of progress and expected next steps.

The School will record the complaint, actions taken and outcome and consider whether any broader corrective, preventative or continuous improvement action is required.

The stated timeframes are indicative and do not override any shorter timeframe or immediate action required by law, child safety obligations or the circumstances of the complaint.

5.3 Child Safety-Related Complaints

A complaint may also raise a child safety incident, disclosure or concern, including an alleged breach of the Child Safety Code of Conduct, abuse or other harm, staff misconduct, or concerns about the School's response to a child safety matter. These matters must be managed in accordance with the School's Child Safety Program, including the Complaints Management (Child Safety) Policy and Procedures and the Reporting and Responding Obligations (Child Safety) Policy and Procedures.

The School will take appropriate steps to support and protect any student who raises, is affected by, or is otherwise connected with a child safety complaint or concern while the matter is being responded to.

Where a complaint raises an immediate child safety, safeguarding or external reporting obligation, the Reporting and Responding Obligations (Child Safety) Policy and Procedures takes precedence for those obligations. Required protective action or reporting must not be delayed while a complaint is being assessed or investigated. The general complaints process may proceed concurrently where it does not interfere with or delay the child safety response.

Complaints or concerns relating to child abuse or other harm may require internal escalation and reports to relevant authorities, including Victoria Police, DFFH Child Protection, the Social Services Regulator or the Victorian Institute of Teaching, depending on the circumstances and applicable obligations.

5.4 Other Complaint Pathways

Depending on the subject matter, a complaint may also be managed under another School policy or statutory process. This may include:

- student behaviour, bullying, harassment or discrimination matters
- employee workplace grievances or employment matters
- fraud, corruption or whistleblower matters
- privacy complaints
- criminal conduct or matters requiring referral to an external authority.

Where more than one policy applies, the School will coordinate the processes to avoid unnecessary duplication and to ensure that safety, legal and reporting obligations are addressed first.

6. Roles and Responsibilities

Role	Responsibilities
Board	Approve and regularly review this Policy; oversee the effectiveness of the School's complaints framework and receive appropriate information about significant, systemic or governance-related matters.
Principal	Ensure an effective complaints handling system is implemented; determine or delegate complaint pathways; ensure serious matters and reporting obligations are addressed; oversee systemic improvement.
School Executive / delegated complaint managers	Manage complaints escalated by staff or involving matters within their area of responsibility; assess, investigate and resolve matters as delegated; maintain appropriate records; identify and escalate significant or systemic issues.
Staff	Receive concerns respectfully; respond within the scope of their role; promptly escalate formal, serious or child safety matters; cooperate with investigations; maintain confidentiality.
Volunteers and Contractors	Take concerns seriously and promptly refer complaints or child safety concerns to an appropriate staff member; comply with applicable child safety and reporting obligations.
Students, parents, carers and community members	Raise concerns respectfully, provide relevant information where reasonably requested and participate constructively in the complaints process.

7. Outcomes, Review and Escalation

Possible outcomes will depend on the nature of the complaint and may include:

- providing information or clarification
- an apology or acknowledgement
- review of a decision
- support for a student or family
- corrective or preventative action
- review of a practice or policy
- mediation or another response appropriate to the circumstances.

Resolution does not necessarily mean that all parties agree with the outcome.

Where a complainant is dissatisfied with the management or outcome of a formal complaint, they may request an internal review by writing to the Principal, unless the Principal managed or determined the complaint, in which case the request should be directed to the Board Chair.

The review will ordinarily be undertaken by a person who was not materially involved in the original decision and will consider whether the process was fair and whether the outcome was reasonably open on the information available.

A complaint about the Principal is managed by the Board Chair or an appropriate delegate. A complaint about a Board member should be directed to the Board Chair. A complaint about the Board Chair should be directed to an appropriate Board delegate who is not the subject of the complaint.

Depending on the matter, the School may also suggest independent mediation or another external dispute resolution avenue. Nothing in this Policy prevents a person from contacting an external regulator, authority, professional body or law enforcement agency where they are entitled or required to do so.

8. Record Keeping, Reporting and Continuous Improvement

The School will maintain appropriate records of complaints, actions taken and outcomes in accordance with applicable privacy, record-keeping, employment and child safety requirements. Access to complaint information will be limited to those who need the information to perform their role or comply with legal obligations.

Child safety incidents and concerns will be recorded in accordance with the School's Record Keeping (Child Safety) Policy and Procedures and will not be managed solely through the general complaints register where the Child Safety Program requires separate records.

Complaint information will be analysed periodically to identify recurring issues, systemic risks, service or process failures, training needs and opportunities for improvement. Significant or systemic matters will be escalated through the School's governance and risk management processes as appropriate.

9. Implementation, Monitoring and Review

This Policy will be communicated to our School community in the following ways:

- available on the School website
- included in staff induction processes
- made accessible through relevant School platforms so that it is easily accessible to parents, carers and students
- annual reference in school newsletter
- hard copy available from school administration upon request
- staff complaint handling training and the School's Complaints Handling Program.

Information about complaint pathways will be communicated to students in age-appropriate ways, including through Schoolbox and student wellbeing and child safety communications. The School will provide a child-friendly complaints pathway and ensure students know how to access trusted adults and Child Safety Officers.

The Principal is responsible for implementation of this Policy. The Policy will be reviewed at least every two years, or earlier following legislative or regulatory change, a significant complaint or incident, or an identified improvement need.

10. Definitions

Term	Definition
Complaint	An expression of dissatisfaction about the School, its services, operations, decisions, conduct, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.
Complainant	A person or organisation that makes a complaint. A complaint may also be made anonymously or using a pseudonym.
Child safety-related complaint	A complaint, disclosure, allegation, suspicion, concern or internal report that raises a child safety incident or concern, an alleged breach of a Child Safety Code of Conduct, staff misconduct affecting child safety, or concerns about the School's response to a child safety matter.
Procedural fairness	A fair process that gives an affected person a reasonable opportunity to understand and respond to relevant allegations and requires an impartial decision-maker, subject to safety, legal and regulatory obligations.

11. Related Policies and Resources

- Complaints Management (Child Safety) Policy and Procedures
- Complaints Handling Program - internal operational procedures and staff guidance
- Reporting and Responding Obligations (Child Safety) Policy and Procedures
- Child Safety and Wellbeing Policy
- Child Safety Code of Conduct
- Record Keeping (Child Safety) Policy and Procedures
- Internal Grievance Resolution Policy and Procedures
- Bullying Prevention and Intervention Policy and Procedures
- Student Code of Conduct
- Diversity, Inclusion and Respect for Others Policy
- Privacy Policy
- Ministerial Order 1359 - Implementing the Child Safe Standards
- Education and Training Reform Regulations 2017 (Vic)
- VRQA Guidelines to the Minimum Standards and Requirements for School Registration
- Australian Standard AS 10002:2022 - Guidelines for complaint management in organisations