



Child Safe Program

Complaints Management (Child Safety) Policy and Procedures

Introduction

At Southern Cross Grammar, we believe that safeguarding children is the responsibility of everyone in our community. Together, we are deeply committed to creating an environment where all children and young people are free from harm and nurtured to thrive.

The aim of our Child Safety Program is to ensure that every member of the School community:

- Understands their shared responsibility to protect children and young people from abuse and harm;
- Is aware of the School's procedures and expectations for identifying, responding to, and reporting child safety concerns; and
- Actively contributes to a child-safe culture that promotes the rights, safety, and wellbeing of every child and young person.

While Southern Cross Grammar's Child Safety Program applies to all members of the School community, specific roles and groups, including the Principal (Child Safety Champion), Executive Team, Child Safety Officers, staff, volunteers and contractors, have defined responsibilities and obligations under the School's Child Safety Program.

This Program supports Southern Cross Grammar's compliance with the Child Wellbeing and Safety Act 2005 (Vic) and the Victorian Child Safe Standards, and sets out the reasonable steps the School takes to prevent and respond to child abuse and other harm in all School environments, including online and offsite activities.

Statement of Commitment to Child Safety and Wellbeing

At Southern Cross Grammar, we are committed to creating environments where students feel safe, supported, and valued. We ensure that all students' views are respected, their voices are heard, and their diverse needs are addressed through inclusive child safety policies, strategies, and practices.

We maintain a zero-tolerance approach to child abuse and take proactive measures to identify and manage any risks of harm to students within all school environments.

We foster positive relationships between students and adults, as well as among peers, built on trust, respect, inclusion and kindness.

We give particular attention to the safety and wellbeing of Aboriginal and Torres Strait Islander students, students from culturally and linguistically diverse backgrounds, students with disabilities, those affected by family violence, LGBTIQA+ students, and other vulnerable groups.

We are committed to creating culturally safe environments where Aboriginal and Torres Strait Islander students, and students from all cultural backgrounds, feel respected, valued, and able to express their identity. We recognise that racism, discrimination, and prejudice can cause significant harm to children's safety and wellbeing and have no place in our School community.

Inappropriate, discriminatory, or harmful behaviour directed at students on the basis of race, ethnicity, culture, religion, disability, gender, sexual orientation, or any other personal characteristic, including racism in any form, will not be tolerated. Reports of racism or discriminatory behaviour will be taken seriously, responded to promptly, and addressed in accordance with the School's policies and procedures.

We are committed to identifying and addressing any potential risks to students' safety and wellbeing and to responding promptly and seriously when concerns are raised.

Purpose

Victorian Child Safe Standard 7 says that the School must have and implement child-focused processes for managing complaints and concerns. To meet this Standard, Ministerial Order 1359 (MO 1359) requires Southern Cross Grammar Board to (among other things):

- develop a complaints handling policy that meets a number of specific elements and that clearly outlines:

- the process for making a complaint about the School, or the behaviour of any person within the School
- the roles and responsibilities of leadership, “school staff” and Volunteers in relation to handling complaints
- the process for dealing with different types of complaints, breaches of relevant policies or the Child Safety Code of Conduct, and obligations to act and report
- have policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and cooperating with law enforcement
- ensure record keeping, reporting, privacy and employment law obligations are met when responding to complaints and concerns
- have a clear procedure or set of procedures for responding to complaints or concerns relating to “child abuse”
- ensure that complaints are taken seriously and responded to promptly.

The **Complaints Handling Policy and Procedures** sets out how the School manages complaints in general.

However, child safety-related complaints and other complaints that involve children and young people often have additional or different management requirements.

This Policy and its Procedures complement the Complaints Handling Policy and Procedures and help to create a child safe environment at the School by:

- setting out specific procedures for enabling and managing complaints that involve children and young people (including but not limited to child safety-related complaints)
- establishing processes for receiving, considering and responding to child safety-related complaints; and
- providing additional guidance on implementing the Complaints Handling Policy and Procedures when a complaint involves a child or young person.

They outline how the School and its Staff, Volunteers and Contractors must:

- implement a child-focused complaints handling system
- manage different types of child safety-related complaints
- ensure that child safety-related complaints are handled in a timely, fair and transparent manner.

Of particular importance to this Policy and its Procedures is the phrase “child safety-related complaint”. A child safety-related complaint includes any disclosure, allegation, or internal report of:

- a breach of the **Child Safety Codes of Conduct**
- a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the School or a School event
- a child safety incident or concern involving School Staff, Volunteers or Contractors
- other staff misconduct (such as a procedural breach of the Child Safety Program)
- a complaint about the School’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with the **Reporting and Responding Obligations (Child Safety) Policy and Procedures**.

Scope

If you are one of the people set out in the subsections of this Policy and its Procedures, the relevant subsection applies to you.

For the purposes of this Policy and its Procedures, the terms “Staff” and “staff member” include all Staff, Volunteers and Contractors. It does not matter how often they work or volunteer at or for the School or whether, as part of their role, they have contact with students.

However, the terms “Staff” and “staff member” do not include students who are volunteering with, coaching or tutoring younger students at the School. If you are a student, you must instead comply with the Student Code of Conduct and other relevant School policies.

This Policy and its Procedures apply in all School environments. School environments include the following physical, virtual and online places used during or outside school hours:

- a campus of the School
- online or virtual School environments made available or authorised by Southern Cross Grammar Board (or the Principal on its behalf) for use by a student (including email, intranet systems, software applications, collaboration tools and online services)
- other locations provided by the School or through a third-party provider for a student to use, including but not limited to:
 - camps
 - approved homestay accommodation
 - delivery of education and training such as registered training organisations, TAFEs, non-school senior secondary providers, another school

- sporting events, excursions, competitions and other events.

Roles and Responsibilities

The following people have particular responsibilities under this Policy and its Procedures (additional roles and responsibilities are set out in the subsections below):

Staff Members

If you are a staff member, you are responsible for:

- responding appropriately to a student who raises or is affected by a child safety-related complaint
- understanding and complying with the internal and external reporting obligations that apply to you when responding to a Child Safety-related complaint
- complying with this Policy and its Procedures whenever you receive a child safety-related complaint.

Child Safety Officers

If you are a Child Safety Officer, you are responsible for:

- providing assistance and advice to Staff about their obligations under this Policy and its Procedures
- ensuring that all child safety-related complaints are taken seriously, escalated, reported and responded to
- ensuring that the School responds appropriately to a student who raises or is affected by a child safety-related complaint
- where authorised by the Principal or Deputy Principal, promptly and thoroughly managing the School's response to a child safety-related complaint as set out in the **Procedures** below
- where authorised by the Principal, monitoring the School's compliance with this Policy and its Procedures.

The Principal

If you are the Principal, you are responsible for undertaking Child Safety Officers' responsibilities above, as well as for ensuring the efficient and effective organisation, management and administration of the School's child safety complaints handling processes.

You may authorise other people at the School to undertake certain complaints management responsibilities, however, you remain ultimately responsible and accountable for implementing this Policy and its Procedures.

References to the Principal in this Policy and its Procedures therefore include these other people when they are undertaking responsibilities under this Policy and its Procedures.

The Deputy Principal

If you are the Deputy Principal, you are responsible for undertaking the Principal's responsibilities when they cannot perform them (for example, because they are absent or when a particular child safety-related complaint involves the Principal).

You may authorise other people at the School to undertake one or more of these responsibilities.

Southern Cross Grammar Board

Southern Cross Grammar Board is responsible for:

- approving and regularly reviewing this Policy and its Procedures, as set out in the **Regular Reviews and Continuous Improvement (Child Safety) Policy and Procedures**
- analysing child safety-related complaints and, where appropriate, directing and monitoring improvements to the School's approach to child safety incidents or concerns.

Policy Statement

1. The School's systems for handling complaints that involve students and former students (whether as complainant, victim, witness or person being complained about) are:

- child-focused and follow the National Office for Child Safety's [Complaint Handling Guide: Upholding the rights of children and young people](#) (Complaint Handling Guide) and the Commission for Children and Young People's [Including Children and Young People in Reportable Conduct Investigations resources](#) (when investigating and responding to child safety-related complaints involving Reportable Conduct)
- culturally safe
- confidential
- accessible to all members of the School community

- regularly reviewed, to inform the continuous improvement of the School's child safety and wellbeing policies, procedures and practices.

2. If you are the Principal, you **must** ensure that the School:

- consults with relevant communities about how to enable, support and respond to complaints in a culturally sensitive way
- has simple age and culturally appropriate avenues for students, Staff, parents/carers and the wider community to make a complaint, including child safety-related complaints, as set out in Making a Child Safety-Related Complaint in the **Procedures** below
- develops, in consultation with students, a child-friendly version of this Policy and its Procedures, and provides this to all students
- supports students, families, and relevant staff members involved in a child safety-related complaint in age and culturally appropriate ways, as set out in Support Following Child Safety Incident or Disclosure (Annexure 1)
- keeps appropriate records of all child safety-related complaints and the School's response, as set out in Managing Child Safety-Related Complaints - the School's Obligations in the **Procedures** below
- regularly reviews and analyses child safety-related complaints, as set out in the **Procedures** below
- reports all child safety incidents and concerns that occur at the School or involve its staff members, including those raised in child safety-related complaints, to Southern Cross Grammar Board as soon as practicable after the School becomes aware of the incident or concern
- complies with the following sections of the **Procedures** below:
 - Managing Child Safety-Related Complaints – the School's Obligations
 - Internal Reviews of Child Safety-Related Complaint Outcomes
 - General Reviews of Child Safety Complaints Management.

3. If you are a staff member, you **must** respond to child safety-related complaints by following Responding to Child Safety-Related Complaints – Staff Members' Obligations in the **Procedures** below.

4. If you are the Principal, the Deputy Principal, or have been delegated responsibility for managing, investigating or responding to child safety-related complaints, you **must** respond to a child safety-related complaint as set out in Managing Child Safety-Related Complaints – the School's Obligations in the **Procedures** below.

Procedures

1. Making a Child Safety-Related Complaint

1.1 Anyone can, at any time, make a child safety-related complaint:

- to the Principal
- a Child Safety Officer
- a trusted staff member

in person, in writing or over the phone.

Non-child safety-related complaints should be made to the Complaints Handling Officer.

1.2 Parents/carers, family members and other community members who have child safety concerns about the School or who wish to make a child safety-related complaint about the School, its students or its staff members are asked to follow the procedures set out in the **Child Safety and Wellbeing Policy** and to contact:

- the School's Senior Child Safety Officer (Deputy Principal, Secondary), Emma Kannar, by phoning (03) 8363 2000 or emailing headofsecondary@scg.vic.edu.au, or the Principal; or
- if the concern relates to the Principal, the Deputy Principal by emailing the headofsecondary@scg.vic.edu.au.

1.3 Students have multiple pathways to make a complaint, including child safety-related complaints, at the School. These include:

- disclosing child safety incidents or concerns, including the abuse or other harm of themselves or of any other child, young person or student aged 18 or over, to any staff member. This might be done:
 - verbally
 - in writing
 - through electronic means (such as email); or
 - indirectly (such as in written assignments, in artworks or in any other way)
- disclosing child safety incidents or concerns, including the abuse or other harm of themselves or of any other child, young person or student aged 18 or over, anonymously using the [Southern Cross Grammar - Anonymous Student Safety Report](#) which is located on Schoolbox via the [Student Safety and Wellbeing](#) page.
- by contacting [The Orange Door](#).

2. Responding to a Child Safety-Related Complaint – Staff Obligations

2.1 Support for Complainants

If you receive a complaint containing information about a child safety incident or concern, you **must** offer the complainant and any student involved in the complaint (if they are not the complainant) age and culturally appropriate support and assistance, following **Support Following Child Safety Incident or Disclosure** (Annexure 1).

2.2 Internal and External Reporting

If you receive a complaint that a student may have been subject to, or may be at risk of, abuse or other harm:

- at the School or a School event; or
- from a staff member

you **must** follow the Reporting and Responding Obligations (Child Safety Policy and Procedures).

In particular, you **must**:

- comply with all responding and reporting obligations that apply to you. Depending on the circumstances, these obligations may include:
 - reporting to the Department of Families, Fairness and Housing (DFFH Child Protection)
 - reporting to the Police
 - taking steps to protect students from future risks of abuse or other harm, where those steps are within your power or responsibilities to take (to meet your duty to protect obligations)
 - reporting Reportable Conduct to the Social Services Regulator
 - reporting teacher misconduct to the Victorian Institute of Teaching (VIT)
 - providing information to other external agencies
- report the child safety-related complaint to:
 - a Child Safety Officer or the Principal; or
 - the Deputy Principal, if the complaint involves the Principal

in addition to making any external reports.

3. Managing Child Safety-Related Complaints – The School's Obligations

3.1 Child safety-related complaints that involve, or raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over **must** be managed following the **Reporting and Responding Obligations (Child Safety) Policy and Procedures**.

The following child safety-related complaints fall into this category:

- complaints involving, or raising the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over occurring at the School or a School event
- complaints involving, or raising the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over or by a staff member
- complaints alleging a breach of the Child Safety Codes of Conduct by a staff member and that involve, or raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over.

Relevant response and reporting obligations that apply to these kinds of child safety-related complaints include, but are not limited to:

- Duty to Protect /the Failure to Protect Offence
- Mandatory Reporting to DFFH Child Protection
- Non-Mandatory Reporting to DFFH Child Protection
- Obligation to Report Sexual Offences Against Children to the Police
- Non-Mandatory Reporting to the Police
- Reportable Conduct
- Reporting Teacher Misconduct to the VIT
- Recognising and Responding to Sexual Behaviour in Children and Young People Policies and Procedures.

The Principal (or, if the complaint involves the Principal, the Deputy Principal) is responsible for managing these kinds of child safety-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the School (such as a Child Safety Officer).

3.2 Certain other child safety-related complaints **must** be managed using other relevant policies and procedures in the Child Safety Program

The following child safety-related complaints fall into this category:

- complaints about the School's investigation of and/or response to a specific incident of or concern about abuse and other harm to a child, young person or student aged 18 or over
- complaints that, when responding to a specific incident of, or concern about, abuse and other harm to a child, young person or student aged 18 or over, the School, or a staff member, did not correctly follow the Reporting and Responding Obligations (Child Safety) Policy and Procedures (for example, a complaint that a staff member did not report a child safety incident or concern internally when required to by School policy)
- complaints that the School, or a staff member, did not correctly follow legislative or regulatory requirements regarding child safety in relation to a specific incident of, or concern about, abuse or other harm to a child, young person or student aged 18 or over (for example, a complaint that the School shared information about a child safety incident or concern with an external agency when not permitted by law to do so).

Relevant policies and procedures for managing these kinds of child safety-related complaints include, but are not limited to:

- Reportable Conduct Policies and Procedures
- Regular Reviews and Continuous Improvement (Child Safety) Policy and Procedures.

The Principal (or, if the complaint involves the Principal, the Deputy Principal) is responsible for managing these kinds of child safety-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the School (such as a Child Safety Officer).

3.3 Certain Child safety-related complaints **may** be managed under other School policies and procedures

The following child safety-related complaints fall into this category:

- complaints alleging a breach of the Child Safety Codes of Conduct that **do not** involve, and **do not** raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over by a staff member (for example, a complaint that a staff member has expressed personal views on sexuality in the presence of students)
- complaints alleging procedural breaches of the child safety and wellbeing policies and procedures by Staff that **do not** involve, and **do not** raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over (for example, a complaint that a staff member has not renewed their WWC Clearance)

- general complaints about the child safety and wellbeing policies and procedures themselves (for example, a complaint that our policies and procedures do not accurately reflect the law or that they do not take into account the needs of a particular student or community cohort).

Relevant policies and procedures for managing these kinds of child safety-related complaints include, but are not limited to, the School's general Complaints Handling and/or Human Resources policies and procedures.

The Complaints Handling Officer usually manages these kinds of child safety-related complaints. However, they, or whoever else may be managing the complaint, must – where appropriate – consult with a Child Safety Officer as part of their investigation.

With respect to the final dot point above, given the high risk to the School of not having compliant child safety and wellbeing policies and procedures, it is likely that the School will need to report the outcome of these kinds of complaints to Southern Cross Grammar Board, using the School's usual governance reporting processes.

3.4 Record Keeping About Child Safety-Related Complaints

The School does not hold records of complaints that contain information about child safety incidents or concerns within its general Complaints Handling record keeping system, because of the confidentiality and privacy issues that arise with respect to child safety incidents and concerns.

If you are responsible for managing a child safety-related complaint, you must record it, and the School's response, as a child safety incident or concern, following the [Record Keeping \(Child Safety\) Policy and Procedures](#).

3.5 Guidance and Resources for Managing Child Safety-Related Complaints

The Complaints Handling Policy and Procedures provides guidance on complaints handling principles and a step-by-step guide to managing complaints in general.

The National Office for Child Safety's [Complaint Handling Guide](#) provides guidance on handling complaints that involve children and young people. The CCYP's [Including Children and Young People in Reportable Conduct Investigations resources](#) provide guidance about managing child safety-related complaints involving Reportable Conduct.

The Reporting and Responding Obligations (Child Safety) Policy and Procedures set out procedures that the School will follow for complaints about inappropriate conduct by Staff.

4. Internal Reviews of Child Safety-related Complaint Outcomes

If a complainant or other person involved in a child safety-related complaint (such as a staff member whose behaviour is the subject of the complaint, a student who is the victim of the alleged behaviour or the parent/carer of a student involved in the complaint) is not satisfied with its management or its outcome, they may request an internal review.

This review could be of the:

- procedures undertaken
- findings made
- disciplinary actions proposed or taken; and/or
- other outcomes (including a decision not to make a finding or to take disciplinary or other action).

People who want an internal review must make their request to the Principal.

The School Executive Team undertakes these internal reviews.

5. General Reviews of Child Safety Complaints Management

Regular reviews of child safety-related complaints ensure that the School captures, analyses and, where appropriate, acts on child safety-related feedback, comments or complaints from the School community members and relevant stakeholders.

The **Regular Reviews and Continuous Improvement (Child Safety) Policy and Procedures** sets out The Southern Cross Grammar Board and the School's procedures for conducting these reviews, as well as for reviewing this Policy and Procedures (as part of the regular reviews of the Child Safety Program).

During these reviews, the School analyses child safety-related complaints, to identify causes and systemic failures and to inform continuous improvement.

Definitions

Definitions of particular terms used in this Policy and its Procedures can be found in [Definitions and Key Indicators of Abuse and Other Harm](#) and the [Child Safety Program Definitions List](#), which are annexed to the **Reporting and Responding Obligations (Child Safety) Policy and Procedures**.

Of particular relevance to this Policy and its Procedures are the following additional definitions:

Term	Definition
Complaint	A “complaint” is an expression of dissatisfaction with an action taken, decision made, or service provided, or with the failure to provide a service, take action or make a decision at the School. A complaint can be made by anyone including a student, former student, parent/carers, other family member, staff member or member of the wider community.
Child Safety-Related Complaint	A child safety-related complaint includes any disclosure, allegation or internal report of: • a breach of the Child Safety Codes of Conduct • a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the School or a School event • a child safety incident or concern involving School Staff • other staff misconduct (such as a procedural breach of the Child Safety Program) • a complaint about the School’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with the Reporting and Responding Obligations (Child Safety) Policy and Procedures and Complaints Management (Child Safety) Policy and Procedures.

Implementation

The School implements this Policy and its Procedures through:

- making them available to all Staff, via the School's Schoolbox
- including information about them in induction training and in ongoing refresher training for Staff and relevant Volunteers and Contractors
- making them available to parents/carers, students and the wider School community in summary in the Child Safety and Wellbeing Policy and Procedures for Managing Child Safety Incidents Involving the School or its Staff Members (Summary), which are available on our public website as well as Schoolbox, and induction packs for Board members, staff members and direct contact volunteers.
- providing all students with a child-friendly version of this Policy and its Procedures
- providing a hard copy by request.

Breach

If you breach this Policy and its Procedures, the School can investigate your conduct. You could face disciplinary action, such as (depending on the severity of the breach):

- attending remedial education
- attending counselling
- increased supervision
- restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

You could also face civil or criminal penalties.

Definitions

Definitions of particular terms used in this Policy and its Procedures can be found in [Definitions and Key Indicators of Abuse and Other Harm](#) and the [Child Safety Program Definitions List](#), which are annexures 1 and 4 to the Reporting and Responding Obligations (Child Safety) Policy and Procedures.

Additional key definitions are set out in the relevant subsections above.

Source of Obligation

- Ministerial Order 1359, Clause 11

Related Policies

- **Child Safety and Wellbeing Policy**
- **Codes of Conduct (Child Safety) Policies and Procedures**
- **Reporting and Responding Obligations (Child Safety) Policy and Procedures**
- **Record Keeping (Child Safety) Policy and Procedures**
- **Student Participation and Empowerment (Child Safety) Policy and Procedures**
- **Regular Reviews and Continuous Improvement (Child Safety) Policies and Procedures**
- **Complaints Handling Policy and Procedures**

Related Documents

- Procedures for Managing Child Safety Incidents or Concerns Involving the School or its Staff Members (Summary)
- Child Protection Reporting Obligations: Summary of the School's Procedures for Responding to and Reporting Child Safety Incidents or Concerns

References

- Commission for Children and Young People, Victorian Child Safe Standards
- Commission for Children and Young People, Resources and Support for the Child Safe Standards
- Department of Education, Child Safe Standards Templates and Resources
- National Office for Child Safety, Complaint Handling Guide: Upholding the rights of children and young people
- Commission for Children and Young People, Including Children and Young People in Reportable Conduct Investigations resources

Policy Administration

Status	Document Owner	Approver	Approval Date	Version Number	Last Reviewed	Review Frequency	Next Review Date

Active	Board	Board	Sept 2026	1.0	Aug 2026	Two yearly	Aug 2028
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Annexure 1

Support Following Child Safety Incident or Disclosure