

3.20 Policy

Victory College Complaints Handling and Feedback (Staff) Policy



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Victory College Complaints Handling and Feedback (Staff) Policy

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| Purpose: | This Policy deals with reports as per the Student Protection Policy and exists to ensure that staff complaints are dealt with in a responsive, efficient, effective and fair way, providing a pathway for constructive feedback. |
| Scope: | This Policy applies to: 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. This Policy also covers, though not exhaustively, the use of the College computing and telephone facilities (including voicemail, email and the Internet). |
| References: | <ul style="list-style-type: none"> • 2.55 Privacy Policy • 3.02 Anti-Discrimination Policy • 3.13 Student Protection Policy • 3.16 Code of Conduct (Staff) Policy • 3.19 Community Complaints Handling and Feedback Policy • 3.59 Sexual Harassment Policy • 3.65 Performance Counselling Policy • 3.74 Disability Discrimination Policy • 3.90 Workplace Health and Safety Policy • 3.95 Workplace Bullying Policy • Parkes, J. (2023) "Presentation Paper - Best Practise Complaints Management for School", Hicksons Lawyers |
| Legislation | <ul style="list-style-type: none"> • Racial Discrimination Act 1975 (Cth) • Sex Discrimination Act 1984 (Cth) • Privacy Act 1988 (Cth) • Australian Human Rights Commission Act 1986 (Cth) • Anti-Discrimination Act 1991 (Qld) • Disability Discrimination Act 1992 (Cth) • Equal Opportunity for Women in the Workplace Act 1999 (Cth) • The Corporation Act 2001 (Cth) as amended in Treasury laws Amendments (Enhancing Whistleblower Protections Act 2019 (Cth) • Age Discrimination Act 2004 (Cth) • Fair Work Act 2009 (Cth) • Child Protection Act 1999 (Qld) • Summary Offences Act 2005 (Qld) • Education (General Provisions) Act 2006 (Qld) • Work Health and Safety Act 2011 (Qld) |



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| | <ul style="list-style-type: none">• <i>Industrial Relations Act 2016 (Qld)</i>• <i>Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)</i> | |
| Status: | Approved | Supersedes: Previous |
| Authorised by: | Victory College Committee of Management | Date of Authorisation: February 2026 |
| Review Date: | Biennially | Next Review Date: February 2028 |
| Policy Owner: | Victory College Committee of Management | |



1. INTRODUCTION

- 1.1 Victory College is dedicated to fostering a fair, safe, and harmonious Christian work environment. We value the importance of addressing complaints and feedback with sensitivity, promptness, transparency, and adherence to both Biblical principles and legislation. Our approach to resolving disputes and improving our practices is grounded in the teachings of Jesus, specifically Matthew 18:15-17:

If your brother sins against you, go and show him his fault, just between the two of you. If he listens to you, you have won your brother over. But if he will not listen, take one or two others along, so that 'every matter may be established by the testimony of two or three witnesses.' If he refuses to listen to them, tell it to the church; and if he refuses to listen even to the church, treat him as you would a pagan or a tax collector.

- 1.2 Additionally, the Bible encourages us to seek and provide feedback to promote growth and development. Proverbs 27:17 states, "Iron sharpens iron, and one person sharpens another." By embracing this scriptural principle, we recognize that feedback is a valuable tool for personal and professional improvement. We are committed to creating an environment where staff members feel encouraged and supported in giving and receiving feedback, thereby enhancing our collective effectiveness and fostering a culture of continuous learning.
- 1.3 By aligning our Complaints Handling and Feedback (Staff) Policy with these Biblical principles, we aim to promote reconciliation, understanding, improvement of service and the restoration of relationships within our community.

2. DEFINITIONS

2.3 Definitions

- I. **Complaint:** Expression of dissatisfaction made to or about the College, related to its services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required¹.
- II. **Informal Complaint** is about a matter that is minor, where a discussion of the matter with a relevant staff member is likely to result in a simple resolution.
- III. **Formal Complaint** is about a matter that is serious, complex or may pose a threat to the health and safety of any person. Assessment of the complaint is required by a member of the College Executive, the Head of College or the College Committee of Management.
- IV. **Complainant** all staff of Victory College who makes a complaint on their behalf or on behalf of another person.
- V. **Respondent** is a 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.
- VI. **Feedback:** Information gathered from staff that provides the College organisation with information that may be used for growth and improvement.

3. POLICY

- 3.1 The College is committed to ensuring that staff complaints are dealt with in a responsive, efficient, and effective way, ensuring fairness for all parties.

¹ AS 10002:2022 Guidelines for complaint management in organisations



- 3.2 The College views complaints as part of an important feedback and accountability process.
- 3.3 The College acknowledges the right of staff when dissatisfied with an action, inaction or decision of the College and the College encourages constructive criticism, positive feedback and complaints.
- 3.4 The College recognises that time spent on handling complaints can be an investment in better service to student and parent.
- 3.5 The College is committed to raising awareness of the process for resolving complaints at the College, including by the development and implementation of this policy and related procedures, and via the clear support and promotion of the policy and procedures.
- 3.6 **Complaints Handling Principles** – The College is committed to managing complaints according to the following principles:
- I. all complaints will be treated seriously and sensitively, having due regard to procedural fairness², confidentiality and privacy. Requirements relating to confidentiality and privacy extend to the use and storage of any information and records related to a grievance;
 - II. complaints will be resolved with as minimal disruption as possible. Wherever possible, complaints should be resolved by a process of discussion, cooperation and conciliation. The aim is to reach an acceptable outcome that minimises any potential detriment to ongoing relationships;
 - III. all complaints are private and confidential. They will be managed in accordance with the Privacy and Confidentiality policy of the College (2.55 Privacy Policy);
 - IV. mediation, negotiation and informal resolution are optional alternatives;
 - V. the College will determine the appropriate person to deal with the complaint in the first instance;
 - VI. anonymous complaints will be treated based on the evidence available;
 - VII. complaints will be dealt with fairly and objectively and in a timely manner;
 - VIII. all parties to the complaints will be appropriately supported;
 - IX. the College will give reasonable progress updates;
 - X. appropriate remedies will be offered and implemented;
 - XI. Provide a review pathway for parties to the complaint if warranted;
 - XII. complainants, respondents and people associated with them will not be victimised as a result of lodging the complaints and they will not suffer any other reprisals;
 - XIII. the College will keep records of complaints; and
 - XIV. the College's insurer will be informed if a complaint could be connected to an insured risk.
- 3.7 **Complaints that may be Resolved under this Policy** – The College encourages staff to lodge complaints promptly. These complaints may include areas such as:
- I. the College, its employees having done something wrong;

² Procedural fairness focuses on the fairness of decision-making procedures rather than outcomes. It involves transparent, unbiased, and consistent processes that treat all parties fairly, allowing them to be heard and providing clear explanations. (*Good Decisions*, Queensland Ombudsman. 31 March 2023)



- II. the College, its employees having failed to do something they should have done;
- III. the College, its employees having acted unfairly or impolitely;
- IV. issues of employee behaviour that are contrary to their relevant Code of Conduct;
- V. issues related to learning programs, assessment and reporting of student learning;
- VI. issues related to communication between the College and its employees; and
- VII. general administrative issues.

3.8 Issues Outside this Policy - The following matters are outside the scope of this policy and should be managed as follows:

- I. child protection concerns or risks of harm to children should be dealt with in accordance with the law and the College's Student Protection Policy;
- II. sexual harassment, discrimination, workplace bullying complaints should be dealt with under the College's Anti-Discrimination Policy and Workplace Bullying, Sexual Harassment Policy;
- III. privacy breaches should be dealt with under the College's Privacy of Information Policy;
- IV. employee criminal matters should be directed to the Head of College who will involve the Police as appropriate; and
- V. formal legal proceedings.

3.9 Responsibilities

3.9.1 The College has the following role and responsibilities:

- I. develop, implement, promote and act in accordance with the College's Complaints Handling and Feedback (Staff) Policy;
- II. appropriately communicate the College's Complaints Handling and Feedback (Staff) Policy to staff;
- III. ensure that the College's Complaints Handling and Feedback (Staff) Policy are readily accessible by staff;
- IV. upon receipt of a complaint, manage the complaint in accordance with the College's Complaints Handling and Feedback (Staff) Policy
- V. ensure that appropriate support is provided to all parties to a complaint;
- VI. take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them;
- VII. appropriately implement resolutions;
- VIII. appropriately train relevant employees;
- IX. keep records;
- X. conduct a review/audit of the Complaints Register from time to time;
- XI. monitor and report to the College Committee of Management on complaints;
- XII. report to the College's insurer when that is relevant; and
- XIII. refer to the College Committee of Management immediately any claim for legal redress.

3.9.2 All Parties to a Dispute - The complainant and respondent both have the following role and responsibilities:

- I. apply and comply with the College's Complaints Handling and Feedback (Staff) Policy;



- II. lodge the complaint as soon as possible after the issue arises;
- III. expect that the complaint will be dealt with fairly and objectively, in a timely manner, with procedural fairness wherever practicable and that confidentiality and privacy will be maintained as much as possible;
- IV. provide complete and factual information in a timely manner;
- V. not provide deliberately false or misleading information;
- VI. not make frivolous or vexatious complaints;
- VII. act in good faith, and in a calm and courteous manner;
- VIII. act in a non-threatening manner;
- IX. to be appropriately supported;
- X. acknowledge that a common goal is to achieve an outcome acceptable to all parties;
- XI. recognise that all parties have rights and responsibilities which must be balanced;
- XII. maintain and respect the privacy and confidentiality of all parties; and
- XIII. not victimise or act in reprisal against any party to the dispute or any person associated with them.

3.9.3 Employees Receiving Complaints have the following role and responsibilities:

- I. act in accordance with the College's Complaints Handling and Feedback (Staff) Policy;
- II. inform the party lodging the complaint of how complaints can be lodged, when they should be lodged and what information is required;
- III. provide the complainant with information about any support or assistance available to assist them in lodging their complaint;
- IV. provide the complainant with a copy of the College's Complaints Handling and Feedback (Staff) Policy;
- V. maintain confidentiality;
- VI. keep appropriate records;
- VII. forward complaints to more senior employees, including the Head of College, as appropriate;
- VIII. not victimise or act in reprisal against the complainant, respondent or any person associated with them.

3.10 Feedback

3.10.1 The College values open and respectful communication as an essential component of the educational process. Feedback will be encouraged and received with respect and a commitment to address concerns in a timely and appropriate manner.

3.10.2 All feedback and complaints will be recorded. Feedback will be utilized as a valuable resource to drive continuous improvement in the quality of education and overall school experience. It will be used to identify areas of strength and areas that require improvement.

3.10.3 The privacy and confidentiality of individuals providing feedback will be respected to the greatest extent possible, while ensuring the necessary information is shared with relevant parties involved in addressing the feedback.

3.10.4 Feedback may be of a negative nature. If this is the case the option to lodge a complaint is not negated by the submission of negative feedback.



4. PROCESS

4.1 Guidelines for lodging complaints

- 4.1.1 All complaints are confidential and are considered to be a matter between the parties concerned and those directly involved in the complaints handling process.
- 4.1.2 Recognising that complaints can have varying natures, the College acknowledges that the steps involved in resolving them may also vary. Therefore, the steps outlined below serve as a guide and can be tailored to fit specific complaints. Any modifications made to the listed steps must be documented, along with a clear explanation of the reason behind the changes.
- 4.1.3 If the complaint is against a person listed in the steps outlined below or a conflict of interest is evident, an appropriate delegate will be appointed by either the Head of College, The College Committee of Management or the National Executive of the International Network of Churches (INC). If an appropriate delegate cannot be found the College will have an outside impartial consultant address the complaint.
- 4.1.4 The following steps should be followed:

Steps 1 to 2 contain the process for the addressing of **Informal Complaints**. At any time during Steps 1 to 2 the complainant can escalate the complaint to **Step 3 – Commencement of Formal Complaint Handling Procedure**.

NB: The complainant may withdraw their complaint at any time during the process. If the complaint has been put in writing the withdrawal must also be in writing.

Step 1: The complainant, after prayer and if appropriate, should privately go to the person with whom they have the grievance or, in the case of a grievance with the College Committee of Management, to the appropriate supervisory person³ and seek resolution.

Step 2: In the event that the dispute is still unresolved after going through Step 1 above, supervisors should (initially) be involved in dealing with complaint.

Supervisors include:

- a. The Operations Manager (Admin/Ancillary Staff);
- b. Head of Primary (Primary Staff);
- c. Head of Middle (Middle Staff)
- d. Head of Secondary (Secondary Staff);

The supervisor is to keep detailed records of the complaint and any meetings concerning the complainant.

Step 3 - Commencement of Formal Complaint Handling Procedure: If the complaint is unresolved after the competition or Steps 1 and 2 and the appropriate support at the College has been unsuccessful, the matter may be referred to the Head of College in writing. To facilitate the complaint process, a "Complaint Form" is provided at the end of this policy for the Complainant's convenience. However, please note that complaints may be submitted in any written format. Rest assured that all complaints will be dealt with impartially, regardless of the format in which they are submitted.

³ Ultimately within the College this is the Head of College



Step 4: The Head of College is to review the complaint. Staff may request an external professional mediator to review the complaint. The College reserved the right to appoint the external professional mediator. The Head of College may form a Grievance Committee to assist with this review. The Grievance Committee can consist of supervisors relevant to the College area and other key stakeholders. Any conflict of interest, perceived or actual, would disqualify a person serving on a grievance committee. The Grievance Committee would limit itself to the complaint it was formed to address and the committee would be dissolved once the complaint was satisfactorily resolved.

Step 5: After the initial review, the complainant will have an opportunity to present the case before the Head of College and/or Grievance Committee as part of the official investigation. A support person can be present at the meeting to assist with interpretation and providing support only.

Step 6: It is the aim of the College that the complaint will be investigated and addressed within 10 working days from the date of receipt (by the Head of College) of the written complaint and an official response will be provided to the complainant within 20 working days. However, if the resolution is not acceptable to the complainant, the complainant can bring the matter to the attention of the College Committee of Management and in turn the National Executive of the INC. If the complaint is about the College not meeting its requirements as a Non-State School, then the complainant can submit the matter to the Non- State School Accreditation Board for further review.

Step 7: If, after discussion between the two parties and having exhausted the avenues for redress listed above the complaint remains unresolved, and it relates to one of areas below, then contact can be made with the Fair Work Australia⁴.

- a. awards;
- b. agreements;
- c. the Australian Fair Pay and Conditions Standard (Standard);
- d. workplace determinations;
- e. legislative entitlements to meal breaks, parental leave and public holidays;
- f. during negotiations for a collective agreement; and
- g. performance review and expectation.

If the complaint results in a disciplinary or dismissal meeting with management, staff have the right to request a support person to sit in during the management meetings as per College Performance and Counselling Policy.

4.2 **Role of the “Support Person” in the event of discipline or dismissal meeting with management**

- 4.2.1 If a staff member is engaged with the College in a dismissal meeting, they will have the rights to request for the presence of a support person. A Support person is a person the staff member can have attend a meeting relating to dismissal to assist the employee with “any discussions relating to dismissal”, including assisting the employee during the discussions at the meeting, which may include; assisting the employee's preparations for the meeting, talking to the employee during the meeting, helping the employee

⁴ <https://www.fwc.gov.au/>



formulate what to say during the meeting, providing advice to the employee during the meeting and also other supportive actions (for example, taking notes)⁵⁶.

4.2.2 The “support person” is as the term suggests “a support”. This individual is not permitted to act as an advocate and does not speak on behalf of the staff.

4.3 Guidelines for Feedback

4.3.1 **Feedback Channels:** Staff will have the following avenues available to them to provide feedback:

- I. **One-on-One Meetings:** Staff are encouraged to make an appointment with their supervisor to share their feedback directly.
- II. **Email:** Staff are encouraged to send their feedback directly to the appropriate department or designated person via email.
- III. **Focus Groups:** from time to time small groups of employees from different departments or levels will be formed to gather specific feedback on particular topics or initiatives.
- IV. **Anonymous Surveys:** From time to time the college will conduct surveys using online tools or internal platforms to gather feedback anonymously.

4.3.2 **Review and Analysis:** Feedback will be reviewed by the appropriate personnel, such as teachers, administrators, College Leadership or relevant departments or committees. Feedback will be analysed to identify patterns, themes, and areas of improvement.

4.3.3 **Action and Response:** Not all feedback will require action or response. Feedback that requires action or response will be addressed promptly by the appropriate personnel within the College, as determined by the subject of the feedback.

4.4 Record Keeping and Staff Training

4.4.1 **Complaints:** The College will keep appropriate records of complaints, will monitor complaints and their resolution and will report on a high-level basis to the College Committee of Management on complaint handling at the College using a Complaints Register. The College Committee of Management is to approve the completed Complaint Forms annually.

4.4.2 **Feedback:** All actions, decisions, and outcomes resulting from feedback will be appropriately documented for future reference and accountability.

4.4.3 **Staff Training:** The College is also committed to appropriately training relevant employees (especially senior staff) on how to resolve complaints in line with this policy and the related processes.

5. POLICY REVIEW

5.1 This policy will be reviewed every 2 years unless otherwise advised.

⁵ Fair Work Commission clarifies differences between a support person and advocate (2014), Parliament of Australia https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/FlagPost/2014/May/FWC_support_person_and_advocates

⁶ Qantas Airways Limited v Carter [2012] FWAFB 5776 (17 July 2012) <http://www6.austlii.edu.au/cgi-bin/viewdoc/au/cases/cth/FWAFB/2012/5776.html>



COMPLAINT FORM

The College subscribes to a process of fairness in receiving, assessing, investigating and addressing complaints made by staff, students, parents or the wider College community.

All complaints will be treated seriously and sensitively, having due regard to procedural fairness, confidentiality and privacy. Requirements relating to confidentiality and privacy extend to the use and storage of any information and records related to a grievance. Wherever possible, grievances should be resolved by a process of discussion, cooperation and reconciliation. The aim is to reach an acceptable outcome that minimises any potential detriment to ongoing relationships.

The College endeavours to resolve all complaints with an approach that is aligned with the Christian ethos of the College.

Including your name and contact is preferred for the purpose of validation of the complaint and any follow up correspondence. Your complaint may be escalated to the authorities if it is related to child protection matters.

Process

The formal process is to lodge an official written complaint to the College. The complaint will be reviewed by the Head of College and Grievance Committee. After the initial review, the complainant will have an opportunity to present the case before the Head of College/Grievance Committee prior to an official investigation. A support person can be present at the meeting to assist with interpretation and providing support only. It is the aim of the College that the complaint will be addressed within 10 working days and an official response will be provided to the complaint within 20 working days.

All complaints are private and confidential. They will be managed in accordance with the Privacy and Confidentiality policy of the College (2.55 Privacy Policy).

