



COMPLAINTS HANDLING POLICY

2016

1. INTRODUCTION

1.1 Purpose

The Diocesan Schools System (DSS) is committed to providing an harmonious and safe environment for all students, parents and staff. This policy is intended to ensure that complaints are handled fairly, efficiently and effectively. The complaints management system is intended to:

- enable schools and the Catholic Schools Office (CSO) to respond to issues raised by people making complaints in a timely way; and
- provide information that can be used to deliver quality improvements in schools, systems, practices, procedures and complaint handling.

This policy provides guidance on the key principles and concepts of the complaint management system to both staff and parents and others who wish to make a complaint.

1.2 Scope

This policy applies to all DSS staff receiving or managing complaints from parents, other staff members or the wider community made about schools or the CSO, their services, or how the DSS handles complaints.

There are specific policies that establish processes for handling child protection issues, enrolments, staff grievances, harassment, workplace bullying or other employment relations matters. This policy does not apply to those types of matters.

1.3 DSS Commitment

The DSS expects staff at all levels to be committed to fair, effective and efficient complaint handling.

Director of Schools

The Director of Schools is committed to promoting a culture that values complaints and their effective resolution by:

- providing adequate support and direction to key staff responsible for handling complaints.
- regularly reviewing reports about complaint trends and issues arising from complaints.
- encouraging staff to make recommendations for system improvements.
- supporting recommendations for system improvements arising from analysis of complaint data.

Manager responsible for complaint handling

The Manager responsible for complaint handling is committed to establishing and managing the complaint management system by:

- providing regular reports to the Director of Schools on issues arising from complaint handling work.
- ensuring recommendations arising out of complaint data analysis are canvassed with the Director of Schools and implemented where appropriate.
- training and empowering staff to resolve complaints promptly and in accordance with DSS policies and procedures.
- encouraging staff managing complaints to provide suggestions on ways to improve the DSS complaints management system.

Staff whose duties include complaint handling

Staff whose duties include complaint handling are expected to be committed to demonstrating exemplary complaint handling practices by:

- treating all people with respect, including people who make complaints.
- complying with the DSS Complaints Handling Policy.
- keeping informed about best practice in complaint handling.
- providing suggestions to the Director of Schools on ways to improve the DSS complaints management system.

All staff

All DSS staff are expected to be committed to understanding and complying with DSS complaints handling practice by:

- treating all people with respect, including people who make complaints.
- being aware of DSS complaint handling policies.
- assisting people who wish to make complaints to access the DSS complaints process.
- assisting staff handling complaints to resolve matters promptly.
- providing feedback to their principal/head of service on issues arising from complaints.
- implementing changes arising from individual complaints and from the analysis and evaluation of complaint data.

2. TERMS AND DEFINITIONS

Complaint

A complaint is an expression of dissatisfaction made about a school, the CSO and/or complaint handling processes, where a response or resolution is explicitly, implicitly or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances (see Policy for Addressing Employee Performance and Disciplinary Matters, Policy for Addressing Performance of Principals and Disciplinary Matters).
- responses to requests for feedback about DSS schools (see the definition of 'feedback' below).
- reports of problems or wrongdoing merely intended to bring a problem to the notice of a school or the CSO with no expectation of a response.
- requests for information or explanations about school or DSS activities, decisions, procedures or policies.

Complaints Management System

The Complaints Management System is comprised of all policies, procedures, practices, staff and software used in the management of complaints.

Feedback

Feedback includes opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about schools or the CSO, or DSS complaint handling where a response is not explicitly or implicitly expected or legally required.

Grievance

A grievance is a clear, formal written statement by an individual staff member about another staff member or a work related problem.

3. GUIDING PRINCIPLES

3.1 Facilitating Complaints

People focus

The DSS is committed to seeking and receiving feedback and complaints about practices, procedures and complaint handling at schools and/or the CSO.

Any concerns raised in feedback or complaints will be dealt with within a reasonable timeframe.

People making complaints will be:

- provided with information about the complaints handling process;
- listened to, treated with respect by staff and actively involved in the complaint process where practicable and appropriate; and
- provided with reasons for decision/s and any options for redress or review.

No detriment to people making complaints

All reasonable steps will be taken to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

Anonymous complaints will be accepted and there will be an investigation of the issues raised where there is enough relevant information provided, including the identity of the school or CSO service area to which the complaint relates.

Visibility and transparency

Information about how and where complaints may be made will be readily available and publicised in schools and on the DSS website.

Accessibility

The DSS is committed to ensuring that its complaints management process is easily understood and accessible to everyone, particularly people who may require assistance, for example, people for whom English is not their first language.

If a person prefers or needs another person to assist them in the making and/or resolution of their complaint, the school or CSO 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.

3.2 Respond to Complaints

Early resolution

Where possible, complaints will be resolved at first contact with the particular school or, in the case of complaints about the CSO, first contact with the CSO.

Responsiveness

Complaints will be assessed and prioritised 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.

The DSS is committed to managing people's expectations and will inform them as soon as possible, of the following:

- the complaints process;
- the expected timeframes for actions;
- the progress of the complaint and reasons for any delay; and
- their likely involvement in the process.

The school or CSO will advise people as soon as practicable when it is unable to deal with any part of their complaint.

Objectivity and fairness

Each complaint will be addressed with integrity and in an equitable, objective and unbiased manner. Each complaint will be assessed on its merits.

Conflicts of interests, whether actual or perceived, will be managed responsibly and in accordance with the DSS Conflicts of Interest Policy. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Confidentiality

The identity of people making complaints will be protected where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by the DSS as permitted under privacy legislation.

3.3 Manage the Parties to a Complaint

Empowerment of staff

All staff managing complaints are empowered to implement the complaints management system as relevant to their role and responsibilities. Staff are empowered to resolve complaints promptly and with as little formality as possible.

Staff are encouraged to provide feedback on the effectiveness of our complaints management system.

Managing unreasonable conduct by people making complaints

Schools and the CSO are committed to being accessible and responsive to all people who approach them with feedback or complaints.

When people behave unreasonably in their dealings with either a school or the CSO, their conduct can significantly affect the progress and efficiency of the school or CSO's work. As a result, any conduct that negatively and unreasonably affects a school or the CSO will be proactively and decisively managed by staff.

4. COMPLAINT MANAGEMENT SYSTEM *to deal with complaints not resolved at first point of contact*



4.1 Stages of Managing a Complaint

When responding to complaints, staff should act in accordance with this Policy. There are five key stages in the complaint management system:

- Receipt of complaints
- Acknowledgement of complaints
- Initial assessment and addressing of complaints
- Providing reasons for decisions
- Closing the complaint, records keeping, redress and review

4.2 Receipt of Complaints

Unless the complaint has been resolved at first point of contact, it will be recorded as a complaint together with its supporting information. Initially verbal complaints will be accepted but with serious complaints the person making the complaint may subsequently be asked to set out their complaint in writing.

The record of the complaint will identify:

- the contact information of the person making the complaint;
- issues raised by the person making the complaint;
- the school or service area of the CSO to which the complaint relates;
- the outcome/s sought;
- any other information required to properly respond to the matter; and
- any additional support the person making the complaint requires.

4.3 Acknowledgement of Complaints

The receipt of each complaint will be acknowledged promptly and usually within five working days.

Consideration will be given to the most appropriate medium for communicating with the person making a complaint, taking into account the needs of the school or the CSO and the expressed views of the person making the complaint.

4.4 Initial Assessment and Addressing of Complaints

After acknowledging receipt of the complaint, the staff member handling the complaint will confirm whether the issue/s raised in the complaint is/are within the school's or CSO's control. The outcome/s sought by the person making a complaint will be considered and, where there is more than one issue raised, there will be a determination whether each issue needs to be separately addressed.

When determining how a complaint will be managed, the issues raised will be assessed against the following criteria:

- severity
- complexity
- health and safety implications
- impact on the individual or wider school community
- potential to escalate

Addressing complaints

The methodology for addressing the complaint may include:

- working with the person making the complaint to see how the issues can be appropriately addressed;
- making inquiries with the person or area that is the subject of the complaint; and/or
- conducting an investigation into the issues raised in the complaint.

The nature and scope of any action taken will depend on a number of factors including:

- the circumstances of each case;
- any statutory requirements;
- the issue/s complained about;
- the parties involved; and
- the likely outcome.

4.5 Providing Reasons for Decisions

Following consideration of the complaint and any investigation into the issues raised, the person making the complaint will be contacted in a timely manner and advised of:

- the outcome of the complaint and any action that was taken arising out of the complaint so far as permitted under privacy legislation;
- the reasons for any decisions that have been made; and
- any remedy or resolution that has been offered.

4.6 Closing the Complaint, Record Keeping, Redress and Review

At the time of closing the complaint a record will be made of the following:

- steps taken to address the complaint;
- the outcome of the complaint; and
- any undertakings or follow up action required.

4.7 Three Levels of Complaint Handling

Where possible, complaints will be resolved by staff at the appropriate school/CSO service area level. Staff will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where early resolution of a complaint is not possible, however, due to the complexity of the issues raised, dissatisfaction with the complaint outcome or how the complaint was dealt with, the complaint may be escalated to a more senior officer within the DSS, usually a Schools Consultant or Head of Service. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of the Schools Consultant or Head of Service's review of their complaint they may seek a further review from the Director of Schools. In some instances the Director of Schools may engage a third party to review a matter and provide a report.

5. ACCOUNTABILITY AND LEARNING

5.1 Analysis and Evaluation of Complaints

Complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complaints received
- the outcome of complaints
- issues arising from complaints
- systemic issues identified and
- the number of requests received for internal and/or external review of complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of service and make improvements.

Both reports and their analysis will be provided to the Director of Schools for review.

5.2 Monitoring of the Complaint Management System

The complaints management system will be monitored to:

- ensure its suitability for responding to and resolving complaints; and
- identify and correct deficiencies in the operation of the system

5.3 Continuous Improvement

The DSS is committed to improving the effectiveness and efficiency of its complaints management system. To this end, the DSS will:

- support the making and appropriate resolution of complaints;
- implement best practices in complaint handling;
- regularly review the complaints management system and complaint data; and
- implement appropriate system changes arising out of analysis of complaints data and continual monitoring of the system.

RELATED POLICIES

Conflicts of Interest Policy
Model Complaints Handling Policy Ombudsman NSW
Privacy Policy
Sustaining Strong Catholic Communities Policy

POLICY REVIEW

This policy will be reviewed not less frequently than once every five years.

POLICY DATES

Policy date of completion of formulation and adoption	2006
Date of current version of policy	2016
Date of next review	2021

authorised by
Peter Hamill
Director of Schools