



Review Procedure

The Board and Principal will review the policy as required. The review schedule is directed in response to organisational and/or legislative changes and requirements. The review will be undertaken in consultation with employees and other relevant parties. All relevant persons will be made aware of changes made because of the review.

This policy will be reviewed if:

- There are changes in the workplace that may affect the policy;
- The policy is not effective;
- There are legislative changes that affect the policy; or
- There is a breach of this policy.

This policy is reviewed at least annually.

Document Number:	HR42_01a
Topic:	Complaint Handling
Approval Authority:	Board of Directors
Responsibilities	Blackheath & Thornburgh College
Last Approval Date:	May 2026
Review Date:	April 2027
Audience:	Any person directly affected by the subject of a complaint. Examples may include staff, students, student's parent or guardian, contractors or community members
Related Policies	Child Safe Statement of Commitment Work Health & Safety Policy Child Protection Policy Student Bullying Policy Anti-Discrimination Policy Sexual Harassment Policy Privacy Policy Workplace Bullying Policy Codes of Conduct
Document Web Links:	Education (Accreditation of Non-State Schools) Regulation 2017 (Qld) 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 organizations (ISO 10002:2022, NEQ) Child Safe Organisations Act 2024 (Qld) Child Safe Organisations Queensland Family and Child Commission
Notes:	



Policy statement

The College is committed to ensuring that student, parent, employee and other stakeholder complaints are dealt with in a responsive, efficient, effective, transparent and fair way.

The College views complaints as part of an important feedback and accountability process. The College acknowledges the right of students, parents, employees and other stakeholders to complain when dissatisfied with an action, inaction or decision of the College and encourages such feedback. The College will seek to resolve issues quickly and use principles of conflict resolution to ensure that complaints are resolved with the least amount of stress for those involved. Processes for dealing with a complaint may be formal or informal depending on the nature of the complaint. The College recognises the need to treat all parties with fairness. It views formal complaints as serious.

The College recognises that time spent on handling disputes can be an investment in better service to students, parents, employees and other stakeholders.

The College promotes a safe, inclusive and culturally responsive environment for all students, ensuring their safety and wellbeing are prioritised. The College is committed to students exercising their right to speak up and participate in school processes and decisions that affect them.

Definitions

Complaint	An expression of dissatisfaction made to or about the school, related to the school's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. ¹
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 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 a relevant member of the senior leadership team.
Complainant	The person, organisation or their representative making a complaint. ²
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.
Procedural Fairness	Is concerned with the procedures used by a decision-maker, rather than the actual outcome reached. It requires a fair and proper procedure to be used when deciding.

¹ Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

² Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.2



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Natural justice Is technical terminology for the rule against bias and the right to a fair hearing and is associated with procedures used by courts of law. The terms procedural fairness and natural justice are commonly used interchangeably.

Scope

This policy is applicable to 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.

Complaint Handling Principles

The College is committed to managing complaints according to the following principles:

- Complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe
- Complaints should 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
- A child-centred approach will be maintained, and all complaints will be managed in a manner that prioritises the student's safety, wellbeing, and voice
- A trauma-informed and culturally safe approach to managing complaints will be prioritised
- The complainant and any respondent will be offered support as appropriate
- 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 the lodging the complaint

The College notes that complaints made without substantiation or accusations made without any basis are unprincipled and this will be viewed by the College as a serious matter.

Types of complaints that may be resolved under this policy

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

- The College, its employees or students have done something wrong
- The College, its employees or students have failed to do something that they should have done
- The College, its employees or students have acted unfairly or disrespectfully
- Issues of student or employee behaviour that are contrary to their relevant Code of Conduct, including inappropriate staff conduct as reported by a student.³

³ Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)



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- Issues concerning learning programs, assessment and reporting of student learning
- Issues concerning communication with students or parents or between employees
- Issues concerning fees and payments
- General administrative issues
- Issues relating to non-compliance with a process outlined in school policies or procedures, for example the child protection policy, discrimination policy, or privacy policy.⁴

Student complaints may be brought by students or by parents on behalf of their children, as appropriate in the circumstances.

Issues Outside of this Policy

The following matters are outside of the scope of this policy and will be managed as follows:

- Child protection concerns or risks of harm to children will be dealt with in accordance with the law and the College's Child Protection Policy
- Student bullying complaints will be dealt with under the Student Anti-Bullying & Harassment Policy
- Employee complaints of discrimination, sexual harassment or workplace bullying will be dealt with under the Anti-Discrimination, Sexual Harassment and Workplace Bullying Policy
- Student discipline matters, including matters involving suspension or expulsion, will be dealt with under the Code of Conduct for Students
- Employee complaints related to their employment will be directed to their supervisor;
- Student or employee violence or criminal matters will be directed to the Principal who will involve the police as appropriate
- Formal legal proceedings should be managed as appropriate in the circumstances
- Complaints relating to the education and training services provided by the school to an overseas student should be dealt with in accordance with the *Education Services for Overseas Students Act 2000* and National Code and the school's Overseas Student's Complaints and Appeals Policy and Process.

Note on Confidentiality

Confidentiality is an important issue for all parties. It is essential that any complaint is treated in a confidential manner as much as possible, and with respect.

Parents often seek an assurance of confidentiality before expressing their concerns. If, for example, they wish to discuss a particular member of staff, they may fear that their child will suffer in some way because they have complained.

The College's policy is that complaints made by parents should not rebound adversely on their children and similarly that complaints raised by students should not rebound on them or on other students.

⁴ Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)



It may be possible to deal with a problem without naming individuals. However, even if no names are given, the source of the complaint may be clear and thus confidentiality cannot be assured. Depending on the nature of the complaint and on the circumstances, it may be impractical to investigate without identifying the member of staff or the child. It may also be in the interest of the child to do so.

Members of staff have a right, under procedural fairness, to know about complaints that might be damaging to their reputation. Such complaints will be known only to themselves and to those who have to be consulted. The College will provide support for staff against whom a complaint is made, upon request. This will be provided by a colleague who is not otherwise involved.

If there is a situation involving the Police, the Principal or Risk & Compliance Officer will take responsibility for action in the College. The Chair of the Board will be informed as soon as possible.

Note on Anonymous Complaints

Anonymous complaints may be where there is no indication of either name or address, or where the complainants say that they do not wish to be identified. They may come from members of the public, from parents or from students. If complainants wish to remain anonymous, it may limit the action that can be taken.

Responsibilities

College

The College has the following role and responsibilities:

- Develop, implement, promote and act in accordance with the College's Complaint Handling Policy and Procedure
- Appropriately communicate the College's Complaint Handling Policy and Procedure to students, parents, employees and other stakeholders
- Ensure that the Complaints Handling procedures are readily accessible by staff, students and parents
- Upon receipt of a complaint, manage the complaint in accordance with the Complaint Handling Policy and Procedure
- Ensure that appropriate support is made available to all parties to a complaint
- Take appropriate action to prevent the 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 received from time to time
- Report to the College's insurer when that is relevant
- Refer to the College's Board immediately any claim for legal redress



All Parties to a Dispute

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

- Comply with the school's Complaints Handling Policy
- Provide complete and factual information in a timely manner
- Not provide deliberately false or misleading information
- Not make frivolous or vexatious complaints or retaliatory complaints
- Act in good faith and maintain a mutually beneficial relationship of trust and cooperation
- Act in a calm, courteous manner 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
- 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 and/or managing complaints have the following role and responsibilities:

- Act in accordance with the College's Complaint Handling Policy and procedures
- Refer the complainant to the College's Complaints Handling Policy and provide additional information as necessary
- Maintain confidentiality as far as possible
- Keep appropriate records
- Forward complaints to more senior employees, including the Principal, if the complaint cannot be resolved at the initial level or if it involves serious issues that require the involvement of more senior employees
- Not victimise or act in reprisal against the complainant, respondent or any person associated with them

Implementation

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 through display of the policy on our website.

The College is also committed to regular training of employees (especially senior staff) on the implementation of this policy including through induction and annually thereafter.

The College will keep appropriate records of complaints, will monitor complaints and their resolution and will report on a high-level basis to the Board on complaint handling at the College.

The College will act to encourage students, parents and employees to contribute to a healthy school culture where complaints are resolved with as little formality and disruption as possible.



Complaint Register

The College will maintain a complaint register with details such as the date, source and description of complaints, the employee managing the complaint, the actions taken, outcome and the date the complaint was closed.

The complaint register will be stored securely.

Complaints shall be entered onto the complaint 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 Board with access restricted to the Board.

To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire complaint register will be limited to the Principal and the Risk & Compliance Officer.

The Principal may authorise the sharing of specific, relevant entries from the 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 respondents to a complaint do not gain inappropriate access to information about the allegations against them.

Complaint Handling Procedure

All members of the College community are strongly encouraged to maintain respectful and collaborative working relationships and quickly address any misunderstandings should they arise. However, a person may feel aggrieved during his/her engagement with the College and believe that the situation is serious enough to warrant external assistance to remedy the issue. The source of the complaint may be varied, ranging from conflict over professional or academic issues; concern over an employment condition or application of a College policy through to serious discrimination or harassment.

1. Lodging a Complaint

- a) Complaints can be lodged with the most appropriate staff member at the local level, for example, the initial contact point for many complaints is the student's relevant classroom teacher.⁵
- b) Complaints can be lodged through various methods, including:
 - i. Phone
 - ii. Email
 - iii. In-person (by appointment)

⁵ Further examples for initial complaints:

- Staff with their immediate supervisor, or if a grievance is with a supervisor, the issue should be raised with the Risk & Compliance Officer
- Students with the class teacher, Head of Junior School, Head of Secondary School or Head of their Boarding house
- Students or parents with academic complaints first with the class teacher, then Head of Secondary School or Head of Junior School
- Contractors with the person who has engaged them at the College
- Parents and volunteers with the relevant member of staff overseeing the area of concern or with the Risk & Compliance Officer or Principal
- External stakeholders with the Risk & Compliance Officer or Principal



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- c) If the complainant is unsure where to direct their complaint, they can contact the Reception on 07 4787 5100 or via email at reception@btc.qld.edu.au for guidance.
- d) If the complainant is uncomfortable directing the complaint to the most appropriate member at the local level, or wants to make a formal complaint, they can submit a complaint by
 - i. Emailing: complaints@btc.qld.edu.au
 - ii. Phoning: (07) 4787 5100
 - iii. Sending a letter to: PO Box 339, Charters Towers, QLD, 4820
- e) Where an anonymous complaint is lodged, the College will follow the complaints handling policy, when there is sufficient information to do so.

2. Acknowledgement, Assessment and Referral

- a) The staff member receiving the complaint will:
 - i. acknowledge the complaint within two (2) business days, outlining the next steps and where possible the estimated timeframes.
 - ii. assess the complaint, using the definitions of informal and formal complaints in this policy, and refer the complaint to the informal or formal complaints process.⁶

3. Registration and Support

- a) The recipient of the complaint will enter it onto the complaints register, regardless of whether it proceeds through the informal or formal process.
- b) The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.
- c) If a student is a complainant, respondent or victim, or the child of a complainant, respondent or victim of a matter being managed through this policy, the school may offer the student support where appropriate e.g. discussing suitable adjustments with parents/caregivers.⁷

4. Informal Complaints Handling Process

- a) The informal process is designed to resolve issues promptly and collaboratively at the local level.
- b) It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s).
- c) If the complaint cannot be resolved informally, it will be escalated to the formal process.

⁶ It is noted if appropriate, the person dealing with the complaint may elect to seek to resolve the issue informally by meeting with the parties singly and/or together, providing advice or strategies for action. Such an approach is not an option for dealing with matters related to Child Protection or formal complaints of harassment, bullying or discrimination which should always progress immediately to the formal policy processes.

⁷ The option is available for a support person to be included in any meetings with the person investigating the complaint. The role of a support person is to provide support to the complainant, for example by discussing the issue with him/her or taking notes in the meeting. In this situation, a support person is not an advocate for the complainant and should not become actively involved in the discussions. A support person could be a colleague or friend and in the case of students, parents or guardians.



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5. Formal Complaints Handling Process

- a) The formal process begins with the assessment of the complaint by a designated staff member (e.g., a member of the senior leadership team or the Board Chair for complaints against the Principal).
- b) The staff member may gather additional information through investigation, interviews, or evidence review.
- c) The staff member will determine appropriate action, which may include:
 - iii. Mediation
 - iv. Disciplinary measures
 - v. Implementation of policy changes
 - vi. Referral to external agencies (e.g. police)
 - vii. Provision of written updates to the complainant throughout the process
 - viii. Other actions the Principal determines as appropriate in the circumstances.

6. Complaint Closure

- a) The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome.
- b) The complainant will receive written notification of the outcome and any actions taken where appropriate.

7. Appeals Process

- a) Complainants may appeal the outcome of a complaint by writing to:
 - i. the Principal (for complaints not previously managed by the Principal)
 - ii. the Board Chair (for complaints previously managed by the Principal)

The College does not offer unlimited opportunities for review if a complainant is unhappy with the resolution of a complaint. Any appeal against the resolution of a complaint should be made in writing to the Principal. An appeal is only likely to be considered if there is evidence that there was a procedural problem with the investigation.

The Principal, at their discretion, will consider the application for a review and will either direct that the complaint be re-examined or direct that the matter be closed.

Please note: If the complaint involves the Principal, then it should be raised with the Chair of the Board via a letter sent to the Company Secretary at comsec@btc.qld.edu.au or PO Box 339, Charters Towers, QLD, 4820.