



## Saint Stephen's College Complaint Resolution Procedure

**Purpose:** To outline the complaints handling process that underpin the Complaints Resolution Policy.

### Definitions

- **Adult Student** – a student who has attained the age of 16 years.
- **Complaint/s** - includes grievances or concerns about actions or omissions, reporting incident/s, occurrence/s, behaviours or conduct, or raising problems.
- **Complainant** - refers to the party wishing to make a complaint or raise a concern as defined.
- **Line Manager/s** – includes members of a leadership team as well as middle managers and supervisors who have staff reporting to them in terms of their position descriptions.
- **Guest** – this means anyone on Saint Stephen's College grounds or attending an event/activity at any other location ("off campus") whereby it is known the person is engaging with that event/activity because of their past, current or future relationship with Saint Stephen's College.
- **Respondent/s** - the person against whom a complaint is made.

### When should a Complaint be raised

The ultimate outcome in responding to any inappropriate or unlawful behaviour/conduct is for this behaviour/conduct to stop. To achieve this outcome, the College encourages employees, board members and directors, contractors, volunteers, students, parents/caregivers and community members to endeavour to resolve issues directly and informally through a process of discussion and understanding where possible.

For clarity, parent/caregiver and/or student complaints made against:

- an individual will be referred to the appropriate area/faculty Line Manager or to the Principal, if the individual is a Line Manager.
- If the individual is the Principal, the complaint will be referred to the Board for resolution.
- If the individual is a Board Member or Board Director, the complaint will be referred to the Saint Stephen's College Limited Company Secretary.
- If the complaint is regarding Saint Stephen's College Limited this will need to be managed via independent legal counsel.

For clarity, employees, as well as Board Members and Board Directors, contractor, volunteer and guest (including anyone undertaking work experience or vocational placements) complaints made against:

- an individual will be referred to an Equity Contact Officer, the Human Resources Department or to the Principal.
- If the individual is also a Line Manager or supervisor, the complaint will be referred to an Equity Contact Officer, the Human Resources Department or to the Principal.
- If the complaint is in relation to the Principal, the complaint will be referred to the Board for resolution.
- If the individual is a Board Member or Board Director, the complaint will be referred to the Saint Stephen's College Limited Company Secretary. The Human Resource Department and/or Principal can advise of the Company Secretary, and support the complaint process.

- If the complaint is regarding Saint Stephen's College Limited will need to be managed via independent legal counsel.

Adult students (an adult student means a student who has attained the age of 16 years) should follow the process outlined in the College's Procedures for Promoting Positive Student Behaviours. This is the same process for all students at Saint Stephen's College. The title of the actual procedure may be updated from time to time, as appropriate and as approved by the Principal.

### **Raising a Complaint**

Informal complaints can be raised by email, phone, or in person.

In terms of the formal resolution procedure, the person making the complaint is required to submit the complaint in writing for resolution as soon as possible after the actual incident/s occurred. When making the written complaint, the following information should be provided:

- a brief description of the circumstances of the complaint, including details of the alleged actions/incidents, and date/s of the occurrence/s;
- names and titles (as applicable) of any witnesses to the alleged action/s or incident/s;
- any relevant supporting documentation (if applicable); and
- the proposed solution, remedies or outcomes sought.

Please refer to the Appendix for contact details of relevant contact points.

### **Informal Resolution Procedure - General**

In the event that a person making a complaint wishes to maintain their anonymity, the resolution of their complaint can only be responded to in terms of the informal resolution procedure.

The informal procedure emphasises resolution and ideally restoration without the formality. Informal ways of resolving complaints include one or more of the following options:

- the person making the complaint initiates a discussion with the person against whom they have a complaint and attempts to resolve the matter amicably; and/or
- the parties agree to participate in a mediation, facilitated discussion or a restorative practice process which is conducted either internally or referred to an external facilitator.

### **Informal Resolution Procedure – Employee Complainant**

In addition to the steps above, an employee can also access the following additional options:

- the person making the complaint speaks to an Equity Contact Officer for confidential support and advice; and/or
- together with an Equity Contact Officer, the person making the complaint raises the complaint with the person against whom they have a complaint; and/or
- the person making the complaint requests an Equity Contact Officer raise the complaint generically with the person against whom they have a complaint, without revealing the complainant's details to protect their preferred anonymity; and/or

- an Equity Contact Officer observes inappropriate behaviour occurring and requests the person in question to stop this behaviour occurring, even though no complaint has been made; and/or
- an Equity Contact Officer requests training is provided to a group of staff to address concerns relating to the complaint; and/or
- an Equity Contact Officer requests coaching or counselling is provided to a person to increase their level of self-awareness and the impact of their behaviour on others and to understand their obligations in terms of this Policy.

### **Informal Complaints – Record Keeping**

Appropriate file notes of informal complaints may be kept by the College's employees who initially receive a complaint, Equity Contact Officers, Human Resources, Principal, Board Chair or Company Secretary depending on the matter and the person/s involved.

### **Formal Resolution Procedure**

The formal resolution procedure is followed when the complaint is considered serious and may require disciplinary action being taken against the alleged offender. The formal resolution process requires a complaint to be put in writing, substantiated and investigated. The College will provide assistance to formalise a letter/report, where required.

The formal resolution procedure is also appropriate where:

- informal attempts at resolution have failed;
- the conduct is reportable in terms of the College's Child Protection Policies (please refer to the Child Protection Policy for further information) and/or criminal law;
- a person has made a complaint of discrimination, harassment, sexual harassment or bullying and has been subsequently victimised; and/or
- the complaint is against a more senior person. The formal procedure may help to ensure that the person making the complaint is not victimised or disadvantaged.

Formal complaints will be managed by the relevant staff members who does not have a conflict of interest that would compromise the integrity of the process. For example, if the Line Manager was a party to the complaint, it would be inappropriate that they manage the resolution of the complaint.

The respondent may be required to provide a written response to the complaint. Where a respondent refuses, or is unable to respond in writing, their responses will be documented by the person handling the complaint.

The complaint may then be investigated either internally or referred to an external investigator.

All formal complaints will be treated quickly, seriously, impartially and sympathetically.

Where complaints have been substantiated, appropriate management action may apply.

### **Formal Complaints - Record Keeping**

All formal complaints will be maintained in a confidential Complaints Register, managed by various members of the College Leadership Teams. The Complaints Register will include the following information:

- Date when the issue was raised
- Name of complainant
- Name of other relevant parties
- Name of respondent
- Brief description of the complaint raised
- Location of detailed file notes
- Name of the staff member handling the resolution of the complaint
- Brief description of the resolution of the complaint.

Records of formal complaints, including all investigation reports will be maintained by the staff member handling the resolution of the complaint, appropriate Leadership Team member, Principal, Board Chair or Company Secretary depending on the matter and the person/s involved.

### **Confidentiality**

Confidentiality is an important principle when raising and managing a complaint. It is essential that any complaint is treated with respect and in a confidential manner.

### **Notification of College Insurers**

Where appropriate, the College Insurers will be notified of the complaint and the nature of the complaint by the Business Manager.

### **Reporting**

Regular board reporting will be managed by the College Principal, where appropriate.

### **Frivolous or Vexatious Complaints**

If during the resolution of the complaint (either an informal or formal) it is determined that the original complaint is frivolous or vexatious:

- If an employee, volunteer or contractor disciplinary action may be taken under the Code of Conduct.
- If a Board Member and/or Board Director, as per the relevant clauses of the College Constitution.
- If a student, disciplinary action may be taken under the Student Code of Conduct.
- If a parent/caregiver or member of the community, the College may deem it necessary to ban the individual from attending the College grounds and College functions for a specified amount of time, as permitted under the *Education (General Provisions) Act 2006* (Qld). A parent/caregiver or member of the community can request for a review of this decision as per section 347 and section 349B of the *Education (General Provisions) Act 2006*.

## Version Control

Status	Version	Author	Date	Changes
Approved	v2.0	Director of Human Resources	14 November 2023	Approved by College Board.

## Appendix – Contact Points

College Contact Areas	Email Addresses
Board Chairperson	boardchair@ssc.qld.edu.au
Principal	principalsoffice@ssc.qld.edu.au
Company Secretary	companysecretary@ssc.qld.edu.au
Junior College	jnradmin@ssc.qld.edu.au
Senior College	snradmin@ssc.qld.edu.au
Financial	accounts@ssc.qld.edu.au
Bus	busenquiries@ssc.qld.edu.au