

Complaints handling policy and procedures

1. Introduction

1.1. Purpose and scope

This policy applies to The German International School Sydney (GISS) in handling complaints made in respect of services provided and decisions made by the school or against the operations and/or conduct of staff members, which includes employees, contractors and volunteers.

Matters that are solely personal disputes between parents/guardians are not managed under this policy unless they raise school-related safety, wellbeing, discrimination, harassment, child protection, or operational concerns that GISS is required to address.

Complaints for overseas students are not managed under this policy, refer to related policies below.

1.2. Whistleblowing complaints

This policy does not extend to complaints which are whistleblowing disclosures. The procedure for processing whistleblowing complaints are dealt with in the school's "Whistleblowing Policy".

In summary a whistleblowing disclosure is a disclosure which:

- is made by a board member, staff member, a person who supplies goods or services to the school, including a volunteer, an employer of a supplier or a relative of any of these people;
- involves alleged misconduct, an improper state of affairs or circumstances, or illegal activity, and
- is made to a senior staff member, or officer of the school, the school's auditor or a person who the school has authorised to collect such disclosures.

1.3. Related policies

Complaints about reportable conduct will be addressed in accordance with the school's "Child Protection Policy".

Complaints regarding a grievance between students will be addressed in accordance with the school's "Code of Conduct", "Behaviour Guidance Policy", "Discipline Policy", "Anti-bullying Policy" and "Care and Supervision Policy".

Complaints regarding a grievance between staff members about work matters, including work relationships and decision made by other staff members which impact on their work, will be addressed in accordance with the school's Staff Grievance Policy.

Complaints regarding unlawful discrimination, harassment or bullying between staff are generally addressed in accordance with the school's Discrimination, Harassment and Bullying Statement.

Complaints regarding teacher accreditation processes will be addressed in accordance with the school's Teacher Accreditation Procedures.

Overseas students (students with primary student visa - subclass 500) should also refer to the "Overseas Student Complaints and Appeals Policy and Procedure".

1.4. Confidentiality

All parties involved in complaints handling are required to maintain appropriate confidentiality, including in relation to handling and storing records.

1.5. Privacy

GISS complies with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs), as well as relevant state-based legislation such as the *Health Records and Information Privacy Act 2002 (NSW)*. These laws require schools to handle personal and sensitive information—such as that collected during complaints processes—in a lawful and transparent manner. This includes:

- Collecting, using and disclosing personal information only for purposes directly related to the complaint, unless consent is given or required by law.
- Informing individuals about how their information will be used, who it may be disclosed to, and their rights to access and correct their information.
- Taking reasonable steps to protect personal information from unauthorised access, misuse, loss or disclosure, including secure storage of records.
- Retaining complaint records only as long as necessary and securely disposing of them when no longer required.
- Respecting the privacy of all parties involved throughout the complaints process, except where disclosure is required by law (for example, mandatory reporting obligations or court orders).

For further information, refer to the school's Privacy Policy, which outlines how the school manages personal information in accordance with applicable privacy laws.

2. Complaints

A complaint or grievance is an expression of dissatisfaction made to the school about an educational and/or operational matter relating to services provided by the school or the behaviour or decisions of a staff member, contractor or volunteer, including misconduct.

If a parent/carer or student has a concern about the conduct of a staff member, they should raise their concern with the school in accordance with section 3.

If a complaint that concerns the behaviour of a staff member may constitute reportable conduct, the matter will be addressed by the school's Child Protection Policy in accordance with section 1.3. A complaint about a reportable conduct matter may be current or historical. Timeframes for investigation of complaints relating to reportable conduct are dependent on the individual matter and may be over an extended period of time, particularly in the case of a historical allegation. The school is bound by privacy or other confidentiality requirements when conducting investigations of reportable conduct allegations, which may limit the information that can be shared with the complainant regarding the outcome of an investigation. Please refer to the school's Child Protection Policy for information about reportable conduct.

Complainants are not required to assess whether their concern meets the threshold of reportable conduct before making a complaint. Any concern about a child's wellbeing or

the conduct of an employee, volunteer, contractor or member of the school community may be reported under this policy.

Complaints may be made by a student or parent/carer or any member of the school community.

The school will seek to resolve complaints informally where possible but acknowledges that in some cases a person may wish to make a formal complaint.

3. Raising a complaint

3.1. The complainant

Complaints may be raised by a complainant directly with the person involved. However, if the complainant does not feel comfortable doing so or the matter is one where it may not be appropriate to do so a complaint can be made to the Principal. Any complaint about the conduct of a staff member should be raised directly with the Principal in the first instance.

Should the matter not be resolved between the parties directly in the first instance, the complainant may raise the matter with the school. A complaint can be made in writing to the Principal, via email to principal@giss.nsw.edu.au.

Where a person wishes to make a complaint concerning the Principal, or a conflict of interest is identified, the complaint should be made in writing to the Chair of Board, via email to boardchair@giss.nsw.edu.au. In this situation, the references in this policy relating to the role of the Principal should be read as references to the Chair of Board.

Anonymous complaints will be assessed and addressed to the extent possible based on the information provided.

3.2. The school

The School will acknowledge written complaints within 2 business days where practicable. The School will provide an initial response outlining next steps and indicative timeframes within 5 business days. The School will provide progress updates at least every 10 business days until the matter is finalised, unless the nature of the matter requires otherwise.

4. Handling complaints

4.1. Assessing a complaint

The Principal generally will assess the complaint and determine:

- whether the complaint is one to be addressed under this policy or is a staff grievance or reportable conduct matter, or another matter identified in section 1.3 which are dealt with by the relevant policies, see section 1.3; and
- the priority of the complaint in accordance with the urgency and/or seriousness of the matter raised; and
- whether the school may be required to report the matter to the Office of the Children's Guardian, Police, Department of Communities and Justice or other relevant authorities should the complaint relate to possible unlawful conduct or other reportable matters.

4.2. Managing a complaint

The Principal generally will manage a complaint by:

- a. advising the complainant of the likely steps that will be undertaken by the School in relation to the complaint;
- b. if appropriate, advising the relevant parties of the complaint at the relevant time and providing them with an opportunity to respond;
- c. collecting any additional information the School considers necessary to assess the complaint;
- d. making a decision about how the complaint will be resolved ("resolution decision"); and
- e. if appropriate, advising the complainant in writing, and any other relevant parties as appropriate, of the resolution decision of the Principal and if appropriate, any proposed action to be taken.

There may be circumstances where some of the steps outlined above are not appropriate and the school will determine, on a case-by-case basis the most appropriate method of handling the complaint.

A complainant and the relevant parties that the complaint is about may choose to have an appropriate support person present at any meeting with representatives of the School about the complaint. However, the School maintains the right to determine whether the person's preferred support person is appropriate and may not approve the attendance of a support person where they are determined by the School to be inappropriate.

If a complainant is dissatisfied with GISS's response, they may escalate the complaint to the Board Chair. Where the concern relates to potential non-compliance with non-government school registration requirements and local avenues have been exhausted (or there is a compelling reason), a complaint may be raised with the appropriate Government Authorities (including NESAs).

4.3. Record keeping

Any complaints and related reports are securely stored by the Principal in a restricted-access location (secure digital system). Access to these records is strictly limited to authorised personnel (Chair of Board, Principal). All information is to be treated with strict confidentiality.

5. Contact

If you have any queries about this policy, you should contact the HR Services Manager for advice.

Document Management

Policy name	Complaints Handling Policy and Procedures
Version	1.1
School responsible	Michael Cordes (Principal)
Board portfolio	Governance and Strategy
Related documents	Child Protection Policy Child Protection Procedures Overseas Student Complaints and Appeals Policy and Procedure Discipline Policy Anti-Bullying Policy Code of Conduct Behaviour Guidance Policy
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