



TOOWOOMBA  
GRAMMAR SCHOOL

# Complaints Handling Policy



# Contents

- Introduction ..... 3
- Purpose..... 3
- Scope of Policy ..... 3
- Policy Statement ..... 3
- Definitions ..... 4
- Complaints Handling Principles ..... 5
- Complaints that may be Resolved under this Policy ..... 5
- Issues Outside this Policy..... 6
- Confidentiality ..... 7
- Anonymous Complaints..... 7
- Responsibilities ..... 7
- Referral to the Crime and Corruption Commission..... 9
- Training..... 9
- Implementation ..... 9
- Complaint Register..... 9
- References and Related Documents..... 10
- Review..... 10
- Document History ..... 11
- Appendix A: Complaints Handling Procedures ..... 12



## Introduction

The Complaints Handling Policy (“Policy”) may apply in the event a complaint is received by Toowoomba Grammar School (the “**School**”), including complaints made in relation to Staff, complaints received by parents in relation to their children at the School and complaints made by Staff, students, parents, guardians or a member of the community about services or actions of the School.

This Policy details the School’s approach to receiving, assessing, responding to and addressing complaints made by its Staff, students or a student's parent or guardian.

## Purpose

The purpose of this Policy is to ensure that student, parent or staff complaints are dealt with in a responsive, efficient, effective, transparent and fair way.

The School 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 School recognises the need to treat all parties with fairness. It views formal complaints as serious.

## Scope of Policy

This Policy applies to all students (regardless of age), parents, guardians, and Staff (including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements at the School) (“**Staff**”), and members of the Board of Trustees of Toowoomba Grammar School (“the **Board**”).

## Policy Statement

The School acknowledges the right of students, parents and Staff and others to complain when dissatisfied with the School’s services, including an action, inaction or decision of the School. The school encourages constructive criticism and complaints. The School is committed to ensuring that student, parent and Staff complaints are dealt with in a responsive, efficient, effective, transparent and fair way.

The School will ensure Staff can recognise, receive and appropriately refer complaints to the informal or formal complaints procedure.

The School recognises that time spent on handling complaints can be an investment in better service to students and parents/guardians and a better culture for staff, and views complaints as part of an important feedback and accountability process.

The School aims to promote a safe, inclusive and culturally responsive environment for all students, ensuring their safety and wellbeing is prioritised. The school 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 the School about a real or perceived problem related to the School's services, the behaviour of a member of Staff, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected<sup>1</sup>. It may be made orally or in writing. It may be made in person, on behalf of someone else or anonymously. It can be raised with the Headmaster, a member of Staff or a member of the Board. Complaints can be raised by students, Toowoomba Grammar School families and community members and by the public or regulators.

**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 Headmaster or an informal complaint that could not be resolved informally. Assessment of the complaint is required by a member of the Executive, the Headmaster or the Chair of the Board.

**Complainant** - The person, organisation or their representative making a complaint.<sup>2</sup>

**Natural Justice** - refers to the principles of procedural fairness that ensure complaints are handled fairly, impartially and without bias.

**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. Where required, the proper respondent to a complaint will be assessed and determined by the person managing the complaint.

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<sup>1</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s4.3

<sup>2</sup> Standards Australia, Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s4.2



## Complaints Handling Principles

The School 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 will 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
- anonymous complaints will be treated on their merits
- 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 who lodge a complaint on reasonable grounds will not suffer any other reprisals on the basis of the lodging the complaint
- the School will determine the appropriate person to deal with the complaint in the first instance
- mediation, negotiation and informal resolution are optional alternatives
- the School will give reasonable progress updates
- appropriate remedies will be offered and implemented
- provide a review pathway for parties to the complaint if warranted

## Complaints that may be Resolved under this Policy

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

- the School, its Staff or students having done something wrong
- the School, its Staff or students having failed to do something they should have done
- the School, its Staff or students having acted unfairly or impolitely
- issues of Staff behaviour that is contrary to the Code of Conduct, including inappropriate staff conduct as reported by a student<sup>3</sup>
- issues of student behaviour that is contrary to the Student Behaviour Management Policy and relevant procedures
- issues related to learning programs, assessment and reporting of student learning
- issues related to communication with students or parents or between Staff
- issues related to school fees and payments
- general administrative issues

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



- issues relating to non-compliance with a process outlined in school policies or procedures, for example child protection policy, discrimination policy, or privacy policy<sup>4</sup>.

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

## Issues Outside this Policy

The following matters are outside the scope of this Policy and should be managed as follows:

- child protection concerns including allegations of sexual abuse, likely sexual abuse or harm to children should be dealt with in accordance with the law and the School's Student Safety and Wellbeing Policy
- student bullying complaints should be dealt with under the Anti-Bullying Policy
- student discipline matters, including matters involving suspension or expulsion, should be dealt with under the Student Behaviour Management Policy
- student or Staff violence or criminal matters should be directed to the Headmaster who will involve police as appropriate.
- disputes relating to a staff member's employment should be directed to their manager and dealt with under the Enterprise Agreement and/or employment law. This does not include disputes about work health and safety matters or complaints about relevant unlawful conduct under the sexual harassment policy, which may be dealt with under the School's Complaints Handling Policy.
- formal legal proceedings should be managed as appropriate in the circumstances
- disputes between board members, should be dealt with in accordance with the Board Charter
- 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

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



## Confidentiality

All parties have an interest in maintaining confidentiality in respect of complaints and the process of managing complaints. For example, parents may seek an assurance of confidentiality before they express a concern about a particular member of staff as they may fear that their child will suffer in some way because they have complained. The School's policy is that complaints made by parents or students should not impact adversely on the student or the family. It may be possible to deal with a problem without naming or identifying those involved to the person the complaint is about; however, even if no names are given, the source of the complaint may be obvious and thus confidentiality cannot be completely assured. While every effort will be made to avoid doing so, to enable a respondent to understand an allegation, it may be necessary to name complainants. Where this is the case, the school representative managing the complaint will consult with the complainant before taking that step.

The School will provide directions to the complainants and the respondents to maintain confidentiality and not to take any retaliatory action. Respondents and complainants alike will face discipline if they do not comply with such directions.

For situations involving the police, the Headmaster (or delegate) will act as the School's representative and point of contact. The Chairman of the Board of Trustees will be informed as soon as possible.

## Anonymous Complaints

The School is committed to dealing with complaints in accordance with this Policy and related procedures. If an anonymous complaint is made to the School, complainants will be encouraged to identify themselves in order for the Policy and procedures to be implemented fully. Anonymous complaints will be addressed to the fullest extent practicable, but it may not be possible to effectively resolve complaints and to communicate outcomes with complainants if their contact details are not provided. Complaints from the public will be dealt with on a general basis.

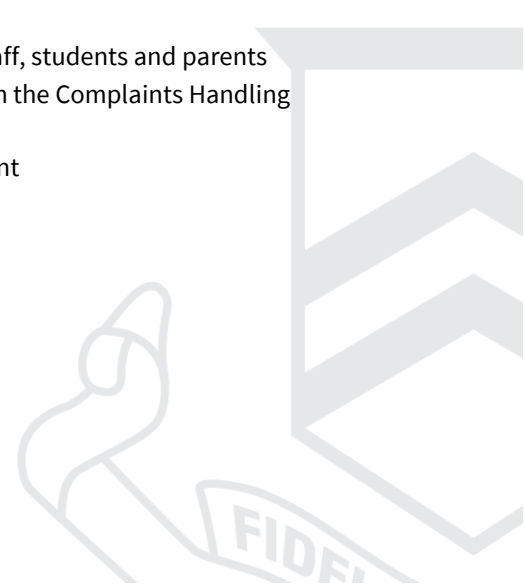
Complainants are encouraged to give their names. If they persist in wishing to remain anonymous, it is at the Headmaster's sole and absolute discretion as to what action, if any, should be taken, depending on the nature of the complaint.

## Responsibilities

### School

The School has the following role and responsibilities:

- develop, implement, promote and act in accordance with the School's Complaints Handling Policy and procedures
- appropriately communicate the School's Complaints Handling Policy and procedures to students, parents and staff
- ensure that the Complaints Handling Policy is readily accessible by Staff, students and parents
- upon receipt of a complaint, manage the complaint in accordance with the Complaints Handling Policy and procedures
- ensure that appropriate support is provided to all parties to a complaint



- take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them
- appropriately implement remedies
- appropriately train relevant Staff
- keep records
- conduct a review/audit of the Complaints Register at regular intervals
- monitor and report to the Board of Trustees on complaints
- report to the School's insurer when that is relevant
- refer to the Board of Trustees immediately any claim for legal redress.

### **All Parties to a Dispute**

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

- apply and comply with the School's Complaints Handling Policy and procedures
- provide complete and factual information in a timely manner
- lodge the complaint as soon as possible after the issue arises
- 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

### **Staff Receiving and/or Managing Complaints**

Staff receiving and/or managing complaints have the following role and responsibilities:

- act in accordance with the School's Complaints Handling Policy and procedures
- refer the complainant to the School's Complaints Handling Policy and provide additional information as necessary
- provide the complainant with information about any support or assistance available to assist them in lodging their complaint
- maintain confidentiality as far as possible
- keep appropriate records
- forward complaints to more senior staff, including the Executive or Headmaster, if the complaint cannot be resolved at the initial level or if it involves serious issues that require the involvement of more senior staff
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.



## Referral to the Crime and Corruption Commission

As Toowoomba Grammar School is a statutory body of the Queensland Government, any complaints regarding alleged corrupt conduct will be referred to the Crime and Corruption Commission (CCC) for investigation.

## Training

The School will train its staff on this Policy and any Procedures relating to complaints handling on their induction and will refresh training annually. Staff who have a role in the receipt or management of complaints will receive appropriate additional training.

## Implementation

The School is committed to raising awareness of the process for resolving complaints at the School, including by the development and implementation of this policy and related procedures, and via the clear support and promotion of the policy and procedures.

The School is also committed to regular training of staff on the implementation of this policy and the related procedures.

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

The School will act to encourage students, parents and Staff to contribute to a healthy school culture where complaints are resolved appropriately .

The School will develop and communicate child-friendly and age-appropriate documents capturing the key principles and steps of this Policy to ensure that students are able to participate and contribute to the improvement of the school via raising issues and making complaints.

## Complaint Register

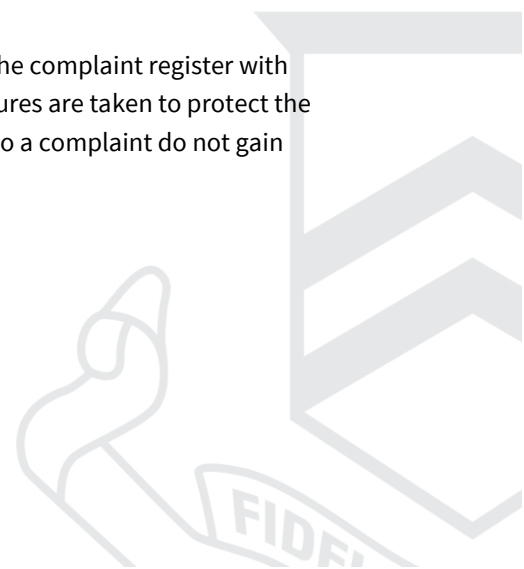
The School will maintain a complaint register with details such as the date, source and description of complaints, the staff managing the complaint, the actions taken, outcome and the date the complaint was closed.

The complaint register will be stored securely.

All 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 Headmaster. Records of complaints about the Headmaster 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 Headmaster, Headmaster's Executive Assistant and the Secretary to the Board of Trustees.

The Headmaster may authorise the sharing of specific, relevant entries from the complaint register with other designated staff members (such as the Executive 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.



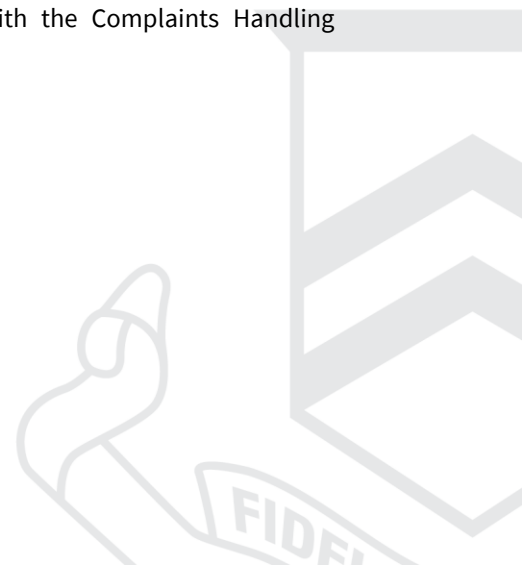
## References and Related Documents

- *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*
- Student Safety and Wellbeing Policy
- Child Safe Standards – Statement of Commitment
- Complaints Handling Procedures
- Student Safety and Wellbeing Policy
- Complaints about the Public Official Policy
- Whistleblower Policy
- TGS Enterprise Agreement
- Code of Conduct
- Anti-Bulling Policy
- Student Behaviour Management Policy
- Privacy Policy
- Sexual Harassment Policy
- Work Health and Safety Policy
- Board of Trustees – Board Charter

## Review

This Policy will be reviewed every 2 years by the Director of Business and Operations or earlier if:

- The procedure, processes and arrangements change;
- Application of the Policy fails to deliver the required outcomes;
- There are changes in requirements, legislation and standards; or
- An area for improvement is identified and agreed.
- Any update to this policy must be undertaken in conjunction with the Complaints Handling Procedures.



## Document History

Version	Section/s Modified	Brief Description of Amendment	Author	Approver	Issue Date
9	Entire Policy	Update and align with ISQ template. Review by legal adviser.	CFO	Board	9 June 2022
10	Entire Policy	Review by ISQ and updated procedures	CFO	Board	16 June 2023
11	Entire Policy	Full review against ISQ updated template. Incorporated Child Safe Standards recommendations.	DoBO	Board	February 2026



## Appendix A: Complaints Handling Procedures

### Lodging a Complaint

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.

Complaints about the Headmaster must be lodged with the Board of Trustees. This complaint should be put in writing and addressed to the Chairman of the Board of Trustees. Complaints received by the Board of Trustees must be referred to the Chairman of the Board of Trustees, who will handle the complaint, so far as practicable, in accordance with these Procedures. The written complaint can be posted to the School's postal address or emailed to [board@twgs.qld.edu.au](mailto:board@twgs.qld.edu.au).

Complaints can be lodged through various methods, including:

- Telephone
- Email
- In-person (by appointment)

If the complainant is unsure where to direct their complaint, they can contact the School's Reception for guidance.

Where an anonymous complaint is lodged, the School will follow the Policy when there is sufficient information to do so.

### Acknowledgement, Assessment and Referral

The staff member receiving the complaint will:

- acknowledge the complaint as soon as possible, outlining the next steps and where possible the estimated timeframes.
- 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.

### Registration and Support

The recipient of the complaint will ensure that it is promptly entered into the complaints register, regardless of whether it proceeds through the informal or formal process.

The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.

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.



Complaints about the Headmaster are recorded and maintained by the Board, not the School, with strictly limited access.

### **Informal Complaints Handling Process**

The informal process is designed to resolve issues promptly and collaboratively at the local level. It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s).

If the complaint cannot be resolved informally, it will be escalated to the formal process.

### **Formal Complaints Handling Process**

The formal process begins with the assessment of the complaint by a designated staff member (e.g., a member of the Executive Leadership Team or the Board Chairman for complaints against the Headmaster).

The staff member may gather additional information through investigation, interviews, or evidence review. The staff member may consult with appropriate members of the student's or the family's community.

The staff member will determine appropriate action, which may include:

- Mediation
- Disciplinary measures
- Implementation of policy changes
- Referral to external agencies (e.g. Police)
- Provision of written updates to the complainant throughout the process
- Other actions the Headmaster determines as appropriate in the circumstances.

### **Complaint Closure**

The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome.

The complainant will receive written notification of the outcome and any actions taken where appropriate.

### **Appeals Process**

Complainants may appeal the outcome of a complaint by writing to:

- the Headmaster (for complaints not previously managed by the Headmaster,)
- the Board Chairman (for complaints previously managed by the Headmaster, or complaints about the Headmaster).

