



# Complaints Policy

## School Education (Foundation to Year 12)

**Version 1.3**  
effective 24 June 2024

**NEW SOUTH WALES**  
The Lakes Christian College

**SOUTH AUSTRALIA**  
Blakes Crossing Christian College  
Hope Christian College  
Seaview Christian College

**WESTERN AUSTRALIA**  
Cornerstone Christian College  
Dunsborough Christian College

**QUEENSLAND**  
Chinchilla Christian College  
Dalby Christian College  
Endeavour Christian College  
Groves Christian College  
Livingstone Christian College  
Staines Memorial College  
Warwick Christian College  
Whitsunday Christian College

<b>Version</b>	1.3	<b>Effective</b>	24 June 2024
<b>Classification</b>	Corporate Policy	<b>Policy Domain</b>	Business Operations
<b>Approved By</b>	Chief Executive Officer	<b>Responsible Officer</b>	Chief Operating Officer
<b>Distribution</b>	<a href="#">Public</a>	<b>Review Due</b>	24 June 2028

## 1 Purpose

- 1.1 This policy outlines the requirements for complaints made regarding services provided by the College, or against College staff members, which includes employees, contractors, and volunteers.
- 1.2 The purpose of this policy is to ensure that student, parent, carer and staff complaints and disputes are dealt with in a responsive, efficient, effective and fair way.
- 1.3 Following the complaints process as outlined helps to focus on issues in a constructive manner, and helps prevent negative unplanned and unproductive alternatives (e.g. threats, defamation, breaching privacy) that can inflame matters leading to a breakdown of relationships.

## 2 Context

- 2.1 Christian Community Ministries Limited ABN 96 105 961 135 (CCM) is a not-for-profit company limited by guarantee, registered with Australian Charities and Not-for-profits Commission (ACNC). CCM is the corporate member of other entities that together with CCM comprise the Christian Community Ministries Group (CCM Group). CCM schools seek to provide a distinctly Christian education from a Biblical worldview which transforms lives through spiritual formation, academic growth and character development.
- 2.2 CCM provides primary and secondary school education, and is an approved operator of Early Childhood Education and Care (ECEC) Services (Approved Provider PR-00001134). Christian Community Ministries Registered Training Organisation (RTO #31056) is nationally registered to provide a range of vocational education and training courses.

## 3 Scope

- 3.1 The arrangements outlined in this policy apply to:

- (a) All schools for which CCM is recognised as the governing body, including any school, for which CCM becomes the governing body subsequent to the effective date of this policy including:

Blakes Crossing Christian College	Blakeview, South Australia
Chinchilla Christian College	Chinchilla, Queensland
Cornerstone Christian College	West Busselton, Western Australia
Dalby Christian College	Dalby, Queensland
Dunsborough Christian College	Quedjinup, Western Australia
Endeavour Christian College	Cooktown, Queensland
Groves Christian College	Kingston, Queensland
Livingstone Christian College	Ormeau, Queensland
Seaview Christian College	Port Augusta, South Australia
Staines Memorial College	Redbank Plains, Queensland
The Lakes Christian College	Castlereagh, New South Wales
Warwick Christian College	Warwick, Queensland
Whitsunday Christian College	Cannonvale, Queensland

- (b) The following schools and entities within the CCM Group for which CCM is not currently the governing body but are to be included in the application of this policy as part of an integration and alignment process:

Hope Christian College Hope Christian College Incorporated ABN 66 024 052 510	Craigmore, South Australia
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- 3.2 This policy does not apply to the following ECEC services which are considered separately in accordance with the complaints policy for early childhood education and care services:

Chinchilla Christian College Kindergarten	Chinchilla, Queensland
Dalby Christian College Early Learning Centre	Dalby, Queensland
Groves Christian College Early Learning Centre, Kindergarten, and School Age Care Service	Kingston, Queensland
Hope Christian College OSHC	Craigmore, South Australia
Livingstone Christian College Early Learning Centre	Ormeau, Queensland
Seaview Christian College Preschool	Port Augusta, South Australia
Staines Memorial College Kindergarten	Redbank Plains, Queensland
Whitsunday Christian College Outside School Hours Care Service	Cannonvale, Queensland

- 3.3 This policy does not extend to personal grievances between parents, guardians, or other members of a College community.
- 3.4 Significant concerns regarding business operations of CCM or one of its Colleges, a breach of legislative responsibility, serious misconduct or unlawful activity are to be addressed in accordance with the *Whistleblower Policy*, which can be downloaded from the CCM website, College websites, or provided upon request. Concerns and complaints about conduct which do not rise to the level of illegality, dishonesty, fraud, or other serious misconduct covered by the *Whistleblower Policy* will be addressed in accordance with this Policy.
- 3.5 Disclosures about reportable conduct and concerns relating to child protection, including as required by relevant legislation, will be addressed in accordance with the College *Child Protection Policy* and *Child Protection Risk Management Strategy*. Disclosures or complaints that fall within the ambit of the *Child Protection Policy* must be dealt with in accordance with that Policy.
- 3.6 Disclosures regarding a grievance between staff members about work matters, including work relationships and decisions made by other staff members which impact on their work are to be addressed in accordance with the *Staff Grievance Policy*.

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## 4 Definitions

- 4.1 The **Board** means the Directors of any legal entity within the CCM Group associated with the Colleges (schools) and ECEC services included in this policy.
- 4.2 **Principal** means the position of most senior person in authority at the relevant College at any given time.
- 4.3 **Senior Leadership Team** consists of the College Principal and other senior management staff which may include a Head of School, or other College Leader(s).
- 4.4 **College Leader** is the relevant staff member with authority to deal with a complaint. The nature of the complaint will dictate who this person is.
- 4.5 A **Parent**, in relation to a student, includes a guardian and any person who has parental responsibility for the student including parental responsibility under the *Family Law Act* of the Commonwealth, and any person with whom a student normally, or regularly resides.
- 4.6 A **Grievance or Concern** is an expression of dissatisfaction, either written or verbal, with an action taken, a decision made, or a service provided by the College, or the failure to do so.
- 4.7 A **Complaint** is a matter submitted to the College Principal, which includes specific details of the alleged issue, together with – where possible – particulars about times, places, quotations of what was said or done, and details of any witnesses.
- 4.8 A **Complainant** is the person making the complaint.
- 4.9 **Culturally Safe** encompasses both cultural awareness and cultural sensitivity in the handling of complaints by the College.
- 4.10 **Natural justice and rules of procedural fairness** ensure that:
- Decision-makers provide an appropriate opportunity for affected parties to present their cases.
  - Decision-makers are impartial and free from actual or apparent bias.

- (c) Decisions are based on relevant evidence.
- (d) Decision-makers investigate and consider relevant issues that are in dispute.

4.11 **Due process** includes consideration of:

- (a) Maintaining respectful interactions/communications with all involved parties.
- (b) Ensuring the privacy of meetings and meeting places.
- (c) Protecting the privacy of witnesses.
- (d) The need to offer a support person.
- (e) Providing updates to the Complainant of the progress on the matter.
- (f) Responding to matters in a timely manner
- (g) Clarity and sequences of what will happen next.
- (h) Keeping appropriate records and notes of outcomes.

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## 5 Policy Statement

### 5.1 CCM Colleges:

- (a) Acknowledge every person is unique and created by God, in His image. Therefore, all members of the College community are to be treated with the utmost respect and courtesy – regardless of their race, gender, religion, physical appearance, socioeconomic status, or academic ability.
- (b) Are committed to the effective management of student or parent/guardian grievances and complaints in a respectful, culturally safe, accountable, transparent, timely and fair manner, while protecting the health and safety of staff through proactive management of unreasonable complainant conduct.
- (c) Seek to provide a high-quality service and preserve a positive atmosphere within the College where open communication with community members is valued.
- (d) Will ensure staff, students, parents, and other College community members are aware of the complaints processes and have access to them.
- (e) Recognise the grievance and complaints process provides an opportunity for reflection and learning and will regularly review complaints received to identify any patterns emerging over time.
- (f) Are committed to following the principles of natural justice, due process, and the rules of procedural fairness throughout the investigation of all grievances and complaints.
- (g) Will act in the best interests of a student individually and all students generally. This may mean they do not always act in accordance with individual requests.
- (h) Value and encourage open, positive and trusting relationships with college community members.

### 5.2 CCM recognises parents and students have a right to raise a grievance or a complaint. CCM Colleges are committed to ensuring that:

- (a) Training is provided to staff and volunteers on the grievance and complaint process.
- (b) Matters raised are received in a positive manner and are dealt with promptly and thoroughly, the outcome, the complainant or the subject is not pre-judged and those who have raised them are kept informed about progress.
- (c) Matters raised involving students are managed with a focus on student wellbeing and to support students to remain engaged in learning.
- (d) Where possible, matters raised are resolved in a manner that enables members of the College community to maintain positive relationships and active engagement in education.
- (e) Mandatory reporting obligations when receiving, responding to, and investigating complaints of child harm or abuse are adhered to.

### 5.3 When addressing a grievance or complaint, it is expected all parties will:

- (a) Apply and comply with this policy.
- (b) Be considerate of each other's views and respect each other's role.

- (c) Be focused on reaching resolution, with the interests of the student involved at the centre.
  - (d) Act in good faith and cooperation.
  - (e) Behave with respect and courtesy.
  - (f) Respect the privacy and confidentiality of those involved, as appropriate.
  - (g) Seek reasonable resolutions that comply with applicable legislation and/or organisational policy.
  - (h) Recognise the College may be subject to legal constraints on its ability to act or disclose information in some circumstances.
- 5.4 Anonymous complaints will be accepted, recorded, and actioned. However, action may be limited where sufficient detail cannot be obtained.
- 5.5 Grievances and complaints will be treated confidentially. The information provided will only be used to assess and respond to the matter raised. Privacy obligations may mean that some details cannot be shared with the complainant. Where this is the case, this will be identified in any response. When necessary, and either allowed or required by law, information may be disclosed to third parties (e.g. police, contracted parties, government authorities) outside the College complaints process.
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## **6 General Responsibilities**

- 6.1 All College community members - students, staff, volunteers, and parents, share the responsibility of making the educational partnership a successful one. When working with children and young people, most issues that arise between home and school are due to poor communication. While the College works hard to ensure communication is clear, sometimes there is the need to clarify something that has been said, handled, missed, overlooked, or simply not explained well enough. Despite best efforts, people – including College community members – do not always achieve their best in every situation.
- 6.2 As a condition of enrolment, all parents or guardians are contracted to support the policies and procedures of the College. To raise matters of concern, parents and/or community members should follow the process outlined in this policy to seek a resolution which restores a positive educational partnership with the College, rather than threaten legal, media, or outside authority action.
- 6.3 The College will not tolerate threatening or abusive behaviour against any of its community members. There is no room for threats, negative targeted comments, or physical abuse against anyone. Such behaviour may result in civil or criminal consequences and may trigger a review of the abusive party's enrolment contract.
- 6.4 Parents and community members are required to engage with the College complaints process rather than resort to unhelpful methods such as social media comments. Personal grievances aired on these forums are damaging to the College's reputation and can adversely impact the wider community. Such action constitutes a breach of the enrolment contract with the College and may result in the termination of the contract. Negative behaviour may also lead to litigation should publicly-posted comments be defamatory or breach privacy laws.

# Complaints Process

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## 7 Stage 1: Raise a Grievance or Concern

- 7.1 Concerns can be communicated to the College in writing (email or letter) or by visiting or phoning the College administration.
- 7.2 Depending on the nature of the matter raised, a staff member may be able to resolve it immediately. Where this is not possible, a staff member will refer the matter to the appropriate person to address the issue and provide a response.
- 7.3 The College will endeavour to collect the necessary information from the concerned person to enable the concern to be investigated. It is important that persons with a concern remember to:
  - (a) Be clear about the issue they want resolved.
  - (b) Focus on the things that are genuinely affecting them or their child.
  - (c) Remain calm and remember they may not have all the facts relating to the issue.
  - (d) Consider what would be an acceptable outcome for them and their child.
- 7.4 Most issues can be resolved at this stage. Those that cannot, and those of a more serious or complex nature, will progress to Stage 2.
- 7.5 Depending on the nature of the concern, the College may arrange for the concern to be treated as a complaint due to its serious or complex nature.

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## 8 Stage 2: Submit a Complaint

- 8.1 If the concern is not resolved to the satisfaction of the parties concerned during Stage 1 and the person concerned indicates that they would like to escalate it to a complaint, or if the person concerned wishes to submit a complaint in the first instance, the College will ask the complainant to provide either verbally, or preferably in writing, as much of the following information as possible:
  - (a) Their name and contact details
  - (b) Details of the complaint, including the names of any people involved
  - (c) Measures already taken to resolve the complaint, including the names of people involved during Stage 1.
  - (d) What they would consider to be a suitable resolution
  - (e) Any supporting documents or additional information
- 8.2 Following receipt of the required details, the College will consider the complaint received and will record the complaint on the College's complaints register. The College will also arrange a suitable time for the complainant and relevant college leader(s) to meet (in person or via phone) and work through the process to:
  - (a) Acknowledge the receipt of the complaint.
  - (b) Gather enough information to be clear about the specifics of the complaint.
  - (c) Provide the Complainant with feedback regarding the complaint.
- 8.3 The college leader will investigate the complaint and make determinations regarding the matter. Unresolved issues and/or those of a very serious nature will progress to Stage 3.

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## 9 Stage 3: Internal Review

- 9.1 If the complaint is not resolved to the satisfaction of the parties concerned during Stage 2, a member of the College Senior Leadership Team will speak with the complainant to discuss the complaint further. This reviewer will require time to review the situation and will inform the complainant of their timeline (and any adjustments to it). The reviewer will communicate his or her decision to the complainant.

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## 10 Stage 4: Decision Review

- 10.1 If the complainant remains unsatisfied with the determinations made, they may request a review of the decision. The review will be undertaken by the College's Senior Leadership Team (including the Principal).

- 10.2 Should the complainant be dissatisfied with the decision reached at the conclusion of the appeal review, the complainant may seek a review by the Board. It should be noted that in such cases, the Board's position is not to re-open or initiate a further investigation but to enquire into the process undertaken and ensure that due process and natural justice were provided under this policy, and in compliance with relevant regulations.
- 10.3 For Colleges in Western Australia only, the Director General of the Department of Education is responsible for ensuring that the College observes the registration standards, including the standard about its complaints handling system. Any student, parent or community member is entitled to contact the Director General with concerns about how the College has dealt with a complaint. Information is available on the [Department of Education website](#). While the Director General may consider whether the College has breached the registration standards, there is no power to intervene in a complaint or override the decision of the College.