



Guildford Grammar School

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# Complaints Handling Policy and Procedure

Concerns, complaints and grievances

**Policy Name:** Complaints Handling Policy and Procedure  
– Concerns, complaints and grievances

**Adopted by:** Guildford Grammar School Strategic Leadership Team (SLT) on 21 June 2020

**Next Review Date:** November 2027

Revised	Details	Endorsed by
<b>June 2020</b>	Title revised from Managing Concerns, Complaints and Grievances Procedure (Students, parents and other external parties) School handbook: 2015.  Procedures reviewed against AISWA Concerns, Complaints and Disputes and the Guide to Registration Standards 2020.	Principal
<b>October 2020</b>	Design of The Complaint Management Flowchart updated	
<b>November 2020</b>	CRICOS Provider number added to document.	
<b>December 2020</b>	Address for the Chair of Council added.  Contact details for Complaints Manager updated.	
<b>June 2022</b>	Updated URL for website link to Tickit.  Added reference to Student Voice boxes.	J Buonocore, Compliance and Risk Manager
<b>September 2024</b>	Added grievance process infographic.  Added SEQTA tile for student voice.  Added procedural fairness.  Removed reference to “dispute” in wording.  Updated contact information for GGS contacts and Overseas student complaints.	H Miller, Deputy Principal Operations
<b>January 2025</b>	Updated Complaints Process flowchart.	

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## 1. Procedure statement

Guildford Grammar School welcomes feedback from all members of the School community and takes all complaints or concerns that may be raised seriously. This Complaints Handling Policy and Procedure is designed to assist you to understand how to make a complaint.

## 2. Scope

The School has established this procedure to ensure that concerns, complaints and grievances from students, parents and caregivers, and external parties are managed in a consistent way. The School values complaints, as many will provide an opportunity for improvement and engagement. Additionally, we recognise that effective complaint handling will benefit the reputation and administration of our School.

This procedure applies to all complaints made by students, parents and caregivers, and external parties regarding the actions of all workers of Guildford Grammar School.

## 3. Context

Guildford Grammar School recognises that from time-to-time issues will arise in the life of the School when parents, students and staff may feel especially concerned about or aggrieved about a particular matter. It is therefore important for the School to have an effective complaint handling policy and procedure, with equitable and transparent mechanisms that ensure all matters of this nature are addressed appropriately, fairly and in a timely manner by the School.

Many minor concerns may be addressed through a simple conversation or meeting where discussions bring about clarity, or adjustments are made to address a situation. At Guildford Grammar School we encourage and empower our staff to handle such matters using their professional judgment, keeping at the forefront of their mind the best interests of our students and the School.

This document does not address complaints relating to staff employment matters or grievances. These are managed through appropriate statutory provisions and the Schools' Grievance Management Policy (Employees).

## 4. What is a complaint?

A complaint is an expression of dissatisfaction made to Guildford Grammar School, related to our services or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

The complaints handling procedure may be used in circumstances involving:

- A minor concern that has not been resolved through conversation, meeting or standard school-based practices and is escalating
- A complaint by a party seeking a written response
- A complaint or grievance that involves potential safety, legal or insurance matters, or
- A matter that may involve community engagement or media.

Complaints may be received in various ways, including in person, by phone, via an online complaint form, by email or by social media.

## 5. Guildford Grammar School's commitment

Guildford Grammar School is committed to handling complaints effectively and efficiently. To manage complaints effectively, we have established a Complaints Handling Policy and Procedure in line with:

- Principle 6 of the National Principles for Child Safe Organisations, using the Office of Child Safety's "Complaints Handling Guide: Upholding the Rights of Children and Young People"
- The international complaints handling standard (ISO 10002:2018 Quality Management – Customer satisfaction – Guidelines for complaints handling in organisations), and
- The Australian/New Zealand complaints handling standard (AS/NZS 10002:2014 Guidelines for complaint management in organisations).

Guildford Grammar School supports the rights of parents to have their complaints listened to and taken seriously in good faith.

Our Complaints Handling Policy and Procedure includes the establishment of an online complaints management system which allows us to effectively capture, manage and report on complaints. Regular analysis of complaints received and the implementation of rectification action, where deficiencies are identified, are key to the School's commitment.

## 6. Informal complaints resolution

The vast majority of issues causing concerns can be handled quickly and in an informal manner. In most cases these issues can be resolved through informal discussions with appropriate staff members.

Our School welcomes suggestions and comments from parents and takes seriously concerns, complaints and grievances that may be raised. A concern will be treated as a less serious matter that may be resolved with a more informal approach.

A complaint or grievance will be treated as an expression of genuine dissatisfaction that requires following a formal process as detailed below.

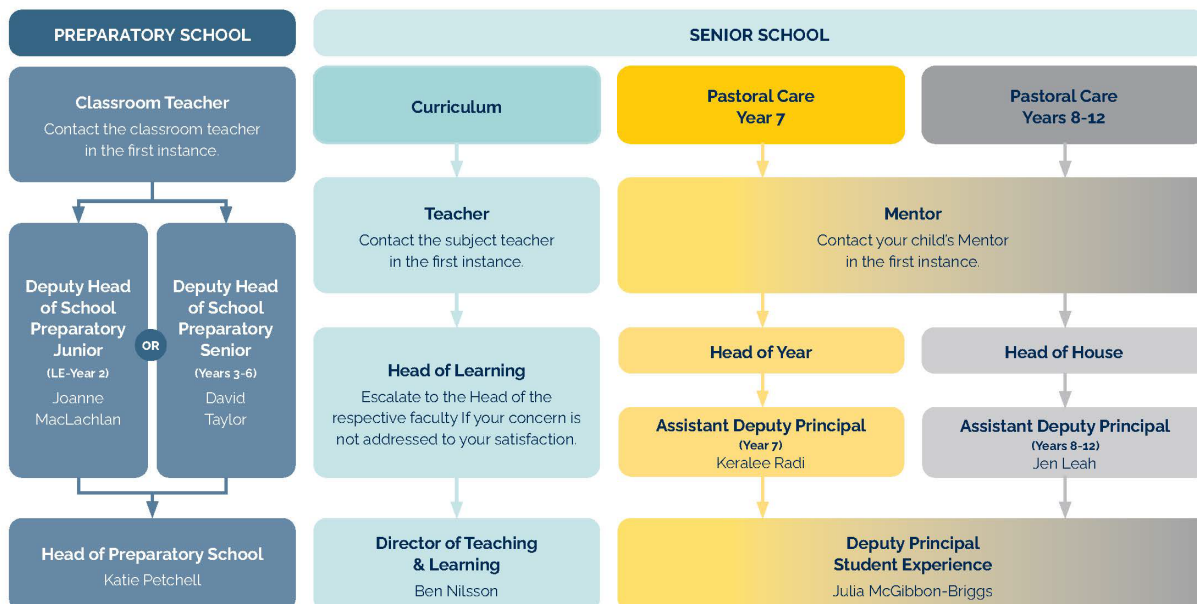
We encourage people to first treat their grievance as a concern when approaching the School, and then lodge a complaint if this is not handled to their satisfaction.

The Parent Enquiry or Concern guidelines are outlined below.



## Communication and Contact Parent Enquiry or Concern

Effective communication is crucial for a successful partnership between home and school. In the event that you encounter any concerns regarding your child's experience at school, **Please follow the below guidelines for efficient resolution.**



## 7. How to make a complaint

We ask that, where appropriate, you first raise the matter directly with the relevant staff member. If that is not appropriate or the issue was not addressed to your satisfaction, or you simply wish to make a formal complaint you can do so by any of the following means:

1. Lodge a complaint on the School's website [Contact Us - Guildford Grammar School \(ggs.wa.edu.au\)](https://www.ggs.wa.edu.au/contact-us). Submit feedback.
2. Contact our Complaints Manager via 08 9377 9222 or send an email to [complaints@ggs.wa.edu.au](mailto:complaints@ggs.wa.edu.au).
3. Write a letter to Guildford Grammar School addressed to The Complaints Manager, 11 Terrace Road, Guildford WA 6935.

## 8. Our internal formal complaints handling process

### Step 1 – Receiving and recording a complaint

All formal complaints are logged into our online complaints management system where they are screened by one of our Complaints Officers, or in the case of complaints against the Principal, by the Chair of the School Council.

### Step 2 – Acknowledge the complaint

All valid complaints will be acknowledged at the time of receipt or as soon as possible afterwards. Complaints are allocated a status, priority and target resolution date. It is our policy, where possible, to resolve all complaints within 14 days.

### **Step 3 – Assess the complaint and address immediate risks**

The Complaints Officer shall conduct an investigation into the issues raised, following principles of procedural fairness, and make a determination.

### **Step 4 - Resolving complaints**

Following the determination, if appropriate, the Complaints Officer shall formulate a resolution and provide a written response to the complainant. The matter will be closed if this response is accepted.

### **Step 5 - Further investigation**

If the initial response is not acceptable the matter will be reviewed internally by the Principal or the Principal's delegate, who may seek additional information or submissions from the relevant parties. The Principal or their delegate will seek to resolve all complaints within 14 days from the date that the review process is initiated. The matter will be closed if the response of the Principal, or their delegate, is accepted.

### **Step 6 - Continuous improvement**

All complaints received will be entered into our Complaints Register and, where appropriate, a corrective action request will be made to address any processes which the complaints investigation revealed may require improvement.

### **Step 7 - External resolution**

If the matter remains unresolved, the complainant may pursue external resolution alternatives.

## **9. Procedural fairness in complaints**

Throughout the entire complaints handling process the School will ensure procedural fairness is accorded to the complainant and the person/s who are the subject of the complaint.

Procedural fairness in complaints handling requires:

- Both the complainant and the person against whom the complaint is made are to have the opportunity to be heard, in person or in writing as appropriate, and to respond to the allegations and/or evidence offered by the other
- An objective investigation of issues or facts which are in dispute
- That the investigator is free from bias, or the perception of bias, and is not 'judge in his or her own cause'
- The evidence supports the complaint outcome, requiring a decision based on the balance of probabilities if there is a dispute over facts.
- That the complaint outcome is finalised by an appropriate delegate, who may also be the investigator, who is free from bias or the perception of bias
- That the outcome is consistent with the School's established policies and/or procedures relevant to the complaint.

While it is the School's policy that these elements of procedural fairness are to be applied to each complaint received by the School, procedural fairness should not otherwise dictate the outcome of a complaint.

## 10. Child friendly complaints

The principles that apply to concerns and complaints are also applied to those concerns and complaints raised by students. Guildford Grammar School is committed to improving the visibility, accessibility, and responsiveness of the complaints process for students at the School.

Students are encouraged to report complaints by:

- Talking to someone in the School they feel comfortable with, whether it is a mentor, classroom teacher, a member of the support staff, the Head of House or Head of Year, or the School Counsellor
- Talking to a staff Child Safe Committee Member
- Using the Student voice tile on SEQTA.

Students can make a complaint in different ways:

- Face to face
- By phone
- In writing (letter, email, or School website)
- Completing an online form via the Student Voice Box SEQTA tile.

Complaints should be acknowledged at the time of receipt or as soon as possible afterwards. Children and young people are often wary about making a complaint and want to be assured they are being listened to straight away.

Complaints that appear trivial still need to be handled seriously. Young people may test the complaints procedure on relatively minor issues before finding the confidence to raise something painful such as bullying.

If the issue is a painful one, or if exploration of it is taking time, a student may need support from another student or from an adult. Students should be encouraged to choose a person with whom they feel comfortable providing support.

In circumstances involving an allegation or complaint in relation to grooming, child abuse and breaches of the Code of Conduct, it is required that the Schools Child Safe Reporting Policy and Procedures are followed, and the matter is reported promptly to the responsible government authorities.

## 11. Overseas students

If an overseas student isn't satisfied with the outcome of Guildford Grammar School's internal complaints handling process, they may lodge an external appeal through the Commonwealth Ombudsman which investigates complaints about problems that overseas students or intending overseas students may have with private education and training in Australia. The services of the Commonwealth Ombudsman are free. The contact details are as follows:

**Call:** 1300 362 072 within Australia. Outside Australia call +61 2 5117 3600.

**Enquiries:** 10:00am to 4:00pm Monday, Tuesday, Thursday and Friday and 10.00am to 2.00pm Wednesday, Australian Eastern Standard Time (Australian Eastern Daylight Time when daylight savings is in effect)



**Postal:** Commonwealth Ombudsman, GPO Box 442, Canberra ACT 2601.

**Website:** [www.ombudsman.gov.au/complaints/international-student-complaints](http://www.ombudsman.gov.au/complaints/international-student-complaints).

Guildford Grammar School agrees to be bound to the Commonwealth Ombudsman's recommendations and will ensure that any recommendations made are implemented within 30 days of receipt of the report.

## 12. Confidentiality

Confidentiality applies with respect to both information relating to the person making the complaint and, if relevant, to the person against whom a complaint is made. Guildford Grammar School is committed to maintaining the confidentiality of information throughout the complaints process.

Personally identifiable information about a complainant will only be made available for the purpose of addressing the complaint and (unless the complainant consents) will be actively protected from disclosure.

Children and young people have the same right to privacy, anonymity and confidentiality as adults. Children and young people may waive their right to privacy and confidentiality if they decide to involve somebody else in the complaints process, e.g. to access support.

If a complainant chooses to make a complaint without disclosing their identity, this will limit the options for proper and thorough investigation and resolution. It also raises issues in relation to procedural fairness for those who have a complaint made against them as they have the right to know of the particulars of the complaint and to respond. The School therefore cannot guarantee that anonymous complaints can or will be dealt with as effectively. Complainants are always encouraged to identify themselves.

As far as possible and appropriate, due discretion will be respected and maintained by all parties throughout the resolution process. This includes situations where information must be shared on a "need to know" basis or where legal, investigative, or statutory obligations require disclosure, reporting, or discussion of certain matters. Therefore, there can be no overriding legal obligation or right with respect to confidentiality. If the complaint falls within the scope of the mandatory reporting regime, this policy and the processes therein are not followed.

Where complaints are made in circumstances where an alleged crime may have been committed or the matter falls under the School Child Safe Reporting Policy and Procedures, the Police and Director General will be contacted and formally advised.

## 13. Referral of a complaint to the School Council

Generally, the Chair of Council and Fellows of School Council are not directly involved with the receipt, investigation or resolution of complaints other than complaints arising within or about the School Council itself.

In instances where a complaint is about the Principal, a person may, if they feel the matter cannot otherwise be resolved or feels it is appropriate to do so, lodge a formal complaint with the Chair of Council. In turn, and in consultation with the complainant, the Chair of Council will expeditiously take all reasonable steps to have the complaint fully investigated and to facilitate a resolution.

Formal correspondence to the Chair of Council can be addressed to:

Chair of Council  
 Guildford Grammar School Council  
 11 Terrace Road  
 Guildford WA 6935

#### 14. Referral of a complaint to an external authority

When a complaint is not or cannot be resolved within the School, the parties may seek the assistance of external professional agencies or other independent arbitrator.

#### 15. Withdrawal of a complaint

A complainant may withdraw a complaint at any stage of the resolution process. If a complaint is withdrawn, the matter will be deemed to be closed, unless the School, at its discretion, wishes to continue to address a matter raised.

#### 16. Record keeping by the School

Accurate, appropriate and secure records will be kept at the School on its Complaints Register by the Complaints Officers responsible for overseeing or managing the resolution process for a particular complaint. The Complaints Register is kept and managed by the Complaints Manager.

#### 17. Roles and responsibilities

Title	Responsibilities
<b>Principal</b>	Is accountable for ensuring that appropriate and relevant policies and procedures are developed, implemented and reviewed on a regular basis and relevant reporting is completed.
<b>Complaints Manager</b>	Is responsible for ensuring all staff are educated about the School's Complaints Handling Policy and Procedure; investigating and where necessary, escalating complaints when requested by the complainant, and maintaining accurate records in the Complaints Register. The Complaints Manager reports to the SLT and Principal to ensure systemic complaints are identified and rectified and monitors the effectiveness of, and continual improvement of, the Complaints Handling Policy and Procedure.
<b>Complaints Officer</b>	A number of key senior staff members act as Complaints Officers, and are authorised to record, investigate, and manage complaints. Complaints Officers are required to maintain accurate records in the Complaints Register and liaise with complainants.

Title	Responsibilities
<b>Staff Member</b>	All staff are authorised to deal with informal complaints. Where a person makes a formal complaint, this must be referred to a Complaints Officer.

### The Role of the Director General

The Director General of the Department of Education is responsible for ensuring that the school observes the registration standards, including the standard about its complaints handling system. Any student, parent/caregiver or community member is entitled to contact the Director General with concerns about how the school has dealt with a complaint. Information is available on the Department of Education website. While the Director General may consider whether the school has breached the registration standards, the Director General does not have power to intervene in a complaint or override the school's decision.

## 18. References

National Principles for Child Safe Organisations  
 International complaints handling standard (ISO 10002:2018)  
 Australian complaints handling standard (AS/NZS 10002:2014)

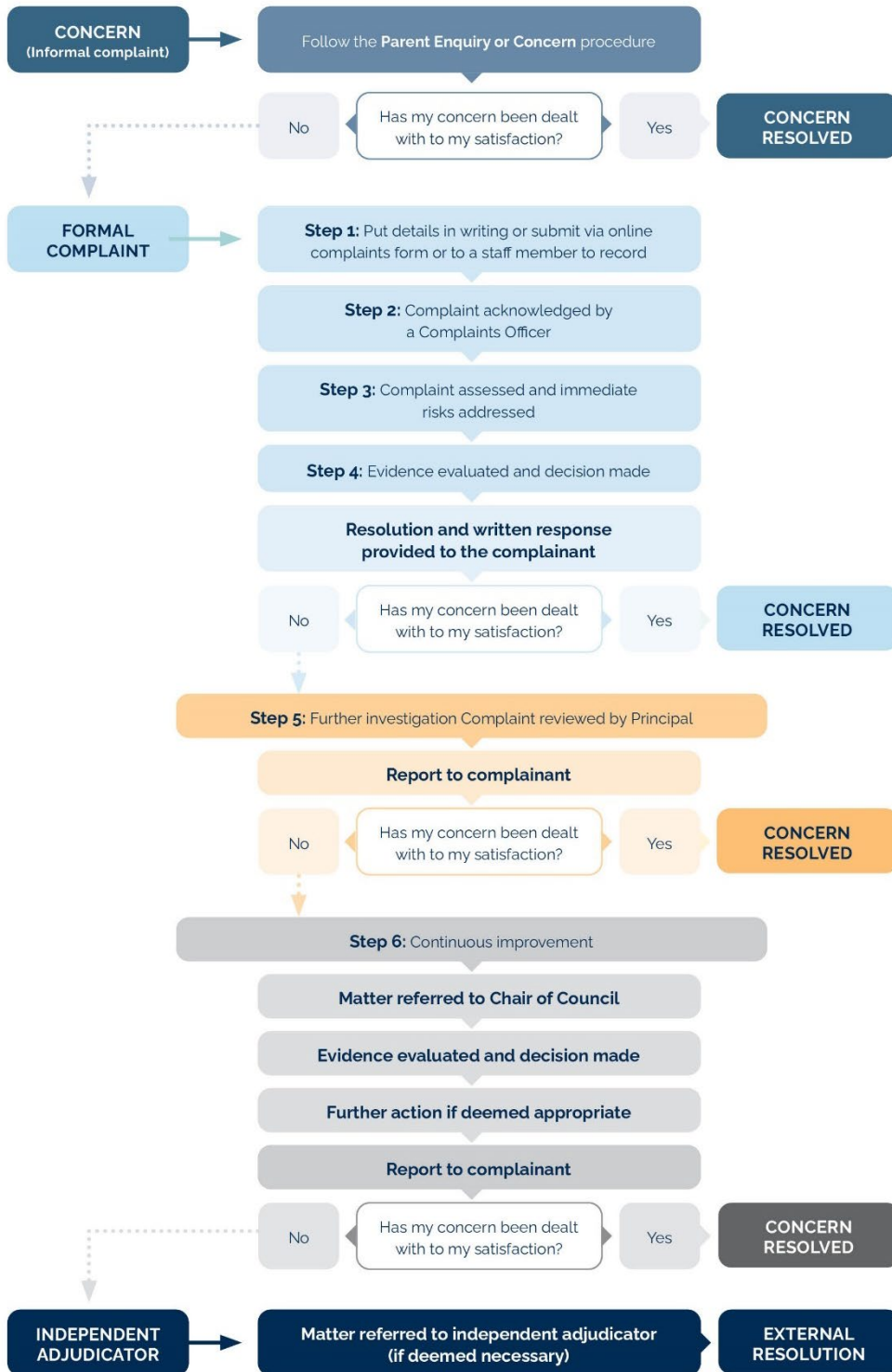
## 19. Related School Policies

Child Safe Reporting Policy and Procedures  
 Grievance Management Policy Employees (PolicyPlus)  
 Privacy Policy  
 Whistleblower Policy

Appendix A: The complaints process flowchart



Communication and Contact  
**Complaints Process**



## Appendix B: Questions and answers

### **How should I raise a concern or lodge a complaint?**

When raising a concern, we suggest contacting the School and asking to speak to a member of staff with whom you feel comfortable. Members of staff will be happy to help. It may be best to start with the person most closely connected to the issue. For example, you can raise House matters with the Head of House or sports concerns with the Director of Sport, and in our Preparatory School you may wish to raise matters related to activities in the classroom with the Classroom Teacher.

If you feel your concern has not been dealt with satisfactorily, you may wish to lodge formal complaint. A formal complaint should be made in writing, clearly outlining the details of the grievance, and this should be lodged with the Principal.

### **I do not want to complain as such, but there is something bothering me.**

The School is open to communication for all members of the School Community, and we want to hear your views and your ideas. Contact a member of staff, as described above.

Alternatively, you can log your concern on the Feedback link on the School website.

### **I am not sure whether to complain or not.**

If you have concerns, you are entitled to raise them. If in doubt, you should contact the School as we are here to help.

### **How long will it take to receive a response from the School?**

If you raise a concern face to face or by telephone, it may be possible to resolve the matter immediately and to your satisfaction.

If you lodge a complaint in writing, we will make a written response within 14 days to acknowledge your complaint and, unless further exploration of the issue is needed, detail what action is proposed or will be taken and the timeline for this action.

### **Will my concern or complaint be treated appropriately?**

Procedural fairness is of the utmost importance and all parties will be treated justly and reasonably within the law and the School's rules. In the interest of finding a just resolution, complaints will be examined and investigated by an authorised person. A hearing appropriate to the circumstances will be held free of any bias. Substance of the complaint will be provided to the subject of the grievance and a clear record of the incident, the action taken, and the outcome will be kept. An evaluation of the action will be carried out and any related procedures will be reviewed.

### **What if I am not satisfied with the outcome?**

We hope that you will feel satisfied with the outcome or, at least, that your concerns have been fully and fairly considered.

If you are not satisfied, the Principal will offer to refer the matter to the Chair of the School Council. Alternatively, you may wish to write directly to the Chair of Council. The Chair of Council will call for a full report from the Principal and will examine matters thoroughly before responding.

Guildford Grammar School recognises and acknowledges your right to complain, and we hope to work with you to resolve your concerns.

In extreme circumstances, if deemed necessary by both parties, final arbitration can be sought through an independent adjudicator. The adjudicator must have no relationship with either party, no personal or professional interest in the outcome of the complaint, no influence on the policy setting of the School, be financially and administratively independent of the School and the complainant and does not have the same governance as the School.

The School's internal process for handling concerns and complaints is conciliatory and non-legal. Therefore, if a complainant is not satisfied that their grievance has been heard justly, they may choose to pursue a legal remedy.

Appendix C: Top tips for making a complaint

**Top tips for making a complaint**

**1 Get support**  
 Talk to a parent, carer, friend or someone you trust and ask them to help you. They can even be with you when you complain. You can also use an interpreter if you need to.

**2 Find out how.**  
 Sometimes it is tricky to know how to make a complaint. It is usually best to talk to the organisation you are dealing with first.

- a. Talk to someone in the organisation you feel comfortable with or check out the website to find out about their complaints system.
- b. Find out who is the person responsible for complaints. This will save you from having to tell lots of people your full story.
- c. What are the different ways you can make a complaint (face-to-face, by phone, in writing - letter, email, any others)?

If you are not safe or do not want to talk to someone in the organisation there are other agencies that can help you. Check out our website [ccyp.wa.gov.au](http://ccyp.wa.gov.au)

**3 Plan what you want to say**  
 Write down what you are not happy about and how this has affected you. Also decide what you think should be done.

This will help you when you have to talk about it. You may need to tell a couple of people in the process, so it will also help you remember what you've said before.

  
 Commissioner for  
 Children and Young People  
 Western Australia

## 4 Be calm and ask questions

When you make your complaint, try to be calm and polite even if you feel upset. Staff of the organisation should also treat you with respect.

Ask as many questions as you like. You may want to know:

- How they will keep your complaint private?
- What will happen next?
- Who will get back to you and your support person?
- When will they get back to you?
- If you're not happy about the result of your complaint what is the next step - who will review your complaint then?



## 5 Keep notes

Write down who you speak or write to, the dates, anything they promise they will do and the date they say they will get back to you. This will help you keep track of things. You can also write down how you feel about the complaint process, this may be useful later.

## 6 Keep at it

Don't be afraid to complain further if you are still not safe or feel the matter has not been resolved fairly.



From the Commissioner for Children and Young People WA

Ground Floor, 1 Alvan Street, Subiaco WA 6008 | Telephone 08 6213 2297 | Facsimile 08 6213 2220  
Freecall 1800 072 444 | [www.ccp.wa.gov.au](http://www.ccp.wa.gov.au)