



Child Safety and Wellbeing Complaints Management Policy

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Statement of Commitment to Child Safety and Wellbeing

All children and young people who come to Strathcona Baptist Girls Grammar School (“Strathcona”) have a right to feel and be safe. We are committed to the safety and wellbeing of all children and young people. We are committed to providing a child-safe and child-friendly environment, where children and young people are safe and feel safe and are able to actively participate in decisions that affect their lives.

We have a zero tolerance for child abuse and other harm (including discrimination and racism) and are committed to acting in students’ best interests and keeping them safe from harm.

The School regards its child safety and wellbeing responsibilities with the utmost importance and is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations and maintaining a child-safe culture.

Each member of the School community has a responsibility to understand the important and specific role that they play individually, and collectively, to ensure that the wellbeing and safety of all students is at the forefront of all that they do, and every decision that they make.

Purpose

Victorian Child Safe Standard 7 says that the School must have and implement child-focused processes for managing complaints and concerns. To meet this Standard, Ministerial Order 1359 (MO 1359) requires the School to (among other things):

- develop a complaints handling policy that meets a number of specific elements and that clearly outlines:
 - the process for making a complaint about the School, or the behaviour of any person within the School
 - the roles and responsibilities of leadership, “school staff” and Volunteers in relation to handling complaints
 - the process for dealing with different types of complaints, breaches of relevant policies or the [Adult Child Safety and Wellbeing Code of Conduct](#), and obligations to act and report
- have policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and cooperating with law enforcement
- ensure record keeping, reporting, privacy and employment law obligations are met when responding to complaints and concerns
- have a clear procedure or set of procedures for responding to complaints or concerns relating to “child abuse”
- ensure that complaints are taken seriously and responded to promptly.

The [Complaints Handling Policy](#) sets out how the School manages complaints in general.



However, child safety and wellbeing-related complaints and other complaints that involve children and young people often have additional or different management requirements.

This policy complements the [Complaints Handling Policy](#) and helps to create a child safe environment at the School by:

- setting out specific procedures for enabling and managing complaints that involve children and young people (including but not limited to child safety and wellbeing-related complaints)
- establishing processes for receiving, considering and responding to child safety and wellbeing-related complaints; and
- providing additional guidance on implementing the [Complaints Handling Policy](#) when a complaint involves a child, young person or student aged 18 or over (“child”).

They outline how the School and its Staff, Volunteers and Contractors must:

- implement a child-focused complaints handling system
- manage different types of child safety and wellbeing-related complaints
- ensure that child safety and wellbeing-related complaints are handled in a timely, fair and transparent manner.

Scope

Where a person falls within one of the categories set out in this policy, the relevant subsection applies to that person.

For the purposes of this policy, the terms “Staff” and “staff member” include all Staff, Volunteers and Contractors. It does not matter how often they work or volunteer at or for the School or whether, as part of their role, they have contact with students.

This policy applies in all school environments. School environments include the following physical, virtual and online places used during or outside school hours:

- a campus of the School
- online or virtual school environments made available or authorised by the School for use by a student (including email, intranet systems, software applications, collaboration tools and online services)
- other locations provided by the School or through a third-party provider for a student to use, including but not limited to:
 - camps
 - approved homestay accommodation
 - delivery of education and training such as registered training organisations, TAFEs, non-school senior secondary providers, another school
 - sporting events, excursions, competitions and other events.



Key Definitions

Complaint

A “complaint” is an expression of dissatisfaction with an action taken, decision made, or service provided, or with the failure to provide a service, take action or make a decision at the School.

A complaint can be made by anyone including a student, former student, parent/carer, other family member, staff member or member of the wider community.

Child Safety and Wellbeing-Related Complaint

For the purposes of this policy, a “*child safety and wellbeing-related complaint*” includes any disclosure, allegation, suspicion, concern or internal report of:

- a breach of the School’s Child Safety and Wellbeing Codes of Conduct
- a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the School or a School event
- a child safety incident or concern involving School Staff, Volunteers or Contractors
- Reportable Conduct
- other staff misconduct (such as a procedural breach of the Child Safety and Wellbeing Program)
- any complaint about the School’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with the [Child Safety and Wellbeing Reporting and Responding Obligations Policy](#).

Policy Statement

The School recognises that complaints are an important safeguard for children and young people, not a failure of systems of relationships. Listening to concerns, responding respectfully and acting transparently are fundamental to a strong child safe culture and help to build trust within the school Community.

The School encourages students, parents and families to raise child safety and wellbeing-related complaints and concerns and affirms that doing so will not disadvantage a student or limit access to support. Complaints are handled in a manner that maintains dignity, respect and psychological safety for all parties, and nothing in this policy discourages or limits a person’s right to make a report to external authorities or to seek support outside the School.

The School’s systems for handling complaints that involve students and former students (whether as complainant, victim, witness or person being complained about) are:

- child-focused and follow the National Office for Child Safety’s [Complaint Handling Guide: Upholding the rights of children and young people](#) (Complaint Handling Guide) and the Commission for Children and Young People’s [Including Children and Young People in Reportable Conduct Investigations](#) resources (when investigating and responding to child safety and wellbeing-related complaints involving Reportable Conduct)
- culturally safe
- confidential
- accessible to all members of the School community
- regularly reviewed, to inform the continuous improvement of the School’s child safety and wellbeing policies, procedures and practices.



Responsibility for implementing this policy, including receiving, managing, investigating, responding to and reviewing child safety and wellbeing-related complaints, is allocated in the [Roles and Responsibilities](#) section and detailed further in the relevant procedural sections below.

Child-Focused Complaints Handling

A child-focused complaints handling process is important for helping students and others at the School make complaints, whether about child safety, wellbeing or otherwise. This policy sets out how the School, as a child safe organisation, has and implements a child-focused child safety and wellbeing complaints handling system.

This Child Safety and Wellbeing Complaints Management Policy is communicated to and understood by students, Staff and parents/carers, and ensures that child safety and wellbeing-related complaints are handled in a timely, fair and transparent manner.

A child-friendly version of this policy is published on the student policy page on Maple (the School's internal digital information and communication platform).

Roles and Responsibilities

The following people have particular responsibilities under this policy (additional roles and responsibilities are set out in the subsections below):

School Board

The School Board is responsible for:

- approving this policy and overseeing its regular review, noting that the Board may delegate aspects of policy development and review in accordance with its delegations framework, while retaining ultimate accountability; and
- overseeing the School's management of child safety and wellbeing-related complaints, including monitoring trends and outcomes and, where appropriate, directing improvements to the School's systems, policies and practices relating to child safety incidents or concerns.

Principal

The Principal is responsible for undertaking the responsibilities of the Child Safety and Wellbeing Officers set out below, and for ensuring the efficient and effective organisation, management and administration of the School's child safety and wellbeing complaints handling processes.

The Principal may authorise other members of the School community to undertake specific complaints management responsibilities. Notwithstanding any such delegation, the Principal remains ultimately responsible and accountable for the implementation of this policy.

Where the Principal is unable to perform their responsibilities (including due to absence or where a child safety and wellbeing-related complaint involves the Principal), the Principal's delegate is responsible for undertaking the Principal's responsibilities under this policy.

The Principal's delegate may authorise other members of the School community to undertake one or more of these responsibilities, as appropriate.

Accordingly, references to the Principal in this policy include the Principal's delegate and any authorised persons when they are undertaking responsibilities under this policy.



Child Safety and Wellbeing Officers

Child Safety and Wellbeing Officers are responsible for:

- providing assistance and advice to Staff about their obligations under this policy
- ensuring that all child safety and wellbeing-related complaints are taken seriously, escalated, reported and responded to
- ensuring that the School responds appropriately to a student who raises or is affected by a child safety and wellbeing-related complaint
- where authorised by the Principal or their delegate, promptly and thoroughly managing the School's response to a child safety and wellbeing-related complaint as set out in this policy
- where authorised by the Principal, monitoring the School's compliance with this policy.

Staff Members

Staff Members are responsible for:

- responding appropriately to a student who raises or is affected by a child safety and wellbeing-related complaint
- understanding and complying with the internal and external reporting obligations that apply to them when responding to a child safety and wellbeing-related complaint
- complying with this policy whenever they receive a child safety and wellbeing-related complaint.

Making a Child Safety and Wellbeing-Related Complaint

1. **Anyone** can, at any time, make a child safety and wellbeing-related complaint to:

- the Principal
- a Child Safety and Wellbeing Officer
- a trusted staff member.

Complaints may be made in person, in writing or over the phone.

Non-child safety and wellbeing-related complaints should be made in accordance with the School's [Complaints Handling Policy](#).

2. **Parents/carers, family members and other community members** who have child safety and wellbeing concerns about the School or who wish to make a child safety and wellbeing-related complaint about the School, its students or its staff members are asked to contact:

- a Child Safety and Wellbeing Officer, the Child Safety and Wellbeing Champion, or the Principal; or
- if the concern relates to the Principal, the Deputy Principal – Learning and Teaching.

3. **Students** have multiple pathways to make a complaint, including child safety and wellbeing-related complaints, at the School. These include:

- disclosing child safety incidents or concerns, including the abuse or other harm of themselves or of any other child, to any staff member. This might be done:
 - verbally
 - in writing



- through electronic means (such as email)
- indirectly (such as in written assignments, in artworks or in any other way)
- making a disclosure anonymously through written or electronic means, where the student does not identify themselves. Anonymous reports are taken seriously, but may limit the School's ability to investigate the matter fully and provide direct support to the student.
- contacting external support services.

Responding to a Child Safety and Wellbeing-Related Complaint

Support for Complainants

Child safety incidents and disclosures can have a significant impact on the wellbeing of those involved. The School is committed to supporting all those who are affected by child safety incidents or concerns.

Support may be provided immediately following an incident or disclosure and on an ongoing basis, and may include reassurance, clear communication about next steps, referral to internal or external support services, and the development of individual support plans where appropriate. The nature and level of support provided will take into account the circumstances of the incident, the needs and wishes of the person affected, and any relevant cultural, disability-related or other individual considerations.

Where necessary to protect the complainant or others, the School may implement interim risk management measures in a manner that prioritises student safety and wellbeing, including temporarily restricting an individual's duties, supervision or access to students, while a child safety and wellbeing concern is being managed.

Where the complaint relates to a sexual offence or sexual misconduct that occurred before 1 July 2018, complainants will be informed about the [National Redress Scheme](#) for people who have experienced institutional child sexual abuse. The process for applications involving the School can be found by contacting the Business Manager.

Internal and External Reporting

All Staff must follow the School's procedures for responding to and reporting child safety incidents or concerns if any information contained in a complaint that is made to them raises a concern that a student may have been subject to, or may be at risk of, abuse or other harm at the School or a School event, or from a staff member.

This includes in particular:

- reporting a child safety incident or concern internally
- reporting to the Department of Families, Fairness and Housing (DFFH Child Protection)
- reporting to the Police
- taking steps to protect students from future risks of abuse or other harm, where those steps are within their power or responsibilities to take
- reporting Reportable Conduct to the Social Services Regulator (SSR)
- reporting teacher misconduct to the Victorian Institute of Teaching (VIT)
- providing information to other external agencies.

All Staff **must** report any child safety and wellbeing-related complaint that is made to them to a Child Safety and Wellbeing Officer, the Child Safety and Wellbeing Champion or the Principal in addition to making any required



external reports. If a complaint is about the Principal, the complaint must be referred to the Deputy Principal – Learning and Teaching.

How the School Manages Child Safety and Wellbeing-Related Complaints

Child safety and wellbeing-related complaints are managed by the School as follows:

Complaints involving child abuse or risk of other harm

The following child safety and wellbeing-related complaints must be managed pursuant to any relevant policies and procedures in the Child Safety and Wellbeing Program:

1. complaints involving, or raising the possibility of a risk of, child abuse or other harm occurring at the School or a School event, or by a staff member, Volunteer or Contractor
2. complaints alleging a breach of the Child Safety and Wellbeing Codes of Conduct that involves, or raises the possibility of a risk of, child abuse or other harm by a staff member, Volunteer or Contractor.

These kinds of child safety and wellbeing-related complaints must be immediately referred to the Principal (or if the complaint involves the Principal, the Deputy Principal – Learning and Teaching) to be managed pursuant to relevant policies and procedures in the Child Safety and Wellbeing Program.

The Principal may, where appropriate, delegate management of these kinds of child safety and wellbeing-related complaints to the Child Safety and Wellbeing Champion or another suitable delegate.

Procedures for managing these kinds of child safety and wellbeing-related complaints are summarised in the [Child Safety and Wellbeing Reporting and Responding Obligations Policy](#) which is available on the School intranet and public [website](#).

Other complaints that are managed under the Child Safety and Wellbeing Program

The following child safety and wellbeing-related complaints must also be managed pursuant to any relevant policies and procedures in the Child Safety and Wellbeing Program:

1. complaints about the School's investigation of and/or response to a specific incident of or concern about child abuse and other harm to a child
2. complaints that the School, or staff member, when responding to a specific incident of, or concern about, child abuse and other harm to a child, has not correctly followed the School's own policies and procedures
3. complaints that the School, or a staff member, has not correctly followed legislative or regulatory requirements regarding child safety and wellbeing in relation to a specific incident of, or concern about, child abuse or other harm to a child (for example, a complaint that the School shared information about a child safety incident or concern with an external agency when not permitted by law to do so).

These kinds of child safety and wellbeing-related complaints must be immediately referred to the Principal (or if the complaint involves the Principal, the Deputy Principal – Learning and Teaching) to be managed pursuant to relevant policies and procedures in the Child Safety and Wellbeing Program.

The Principal may, where appropriate, delegate management of these kinds of child safety and wellbeing-related complaints to the Child Safety and Wellbeing Champion or another suitable delegate.



Complaints that may be managed under other School policies and procedures

The following child safety and wellbeing-related complaints may be managed pursuant to other relevant School policies:

1. complaints alleging a breach of the Child Safety and Wellbeing Codes of Conduct that **do not** involve, and **do not** raise the possibility of a risk of, child abuse or other harm to a child by a staff member, Volunteer or Contractor (for example, a complaint that a staff member has expressed personal views on sexuality in the presence of students)
2. complaints alleging procedural breaches of the Child Safety and Wellbeing Program by Staff that **do not** involve, and **do not** raise the possibility of a risk of, child abuse or other harm to a child (for example, a complaint that a staff member has not renewed their WWC clearance)
3. general complaints about the child safety and wellbeing policies and procedures themselves (for example, a complaint that the policies and procedures do not accurately reflect the law or that they do not take into account the needs of a particular student or community cohort).

Although these kinds of child safety and wellbeing-related complaints may be managed pursuant to other relevant school policies, the person managing the complaint would - where appropriate - consult with the relevant Child Safety and Wellbeing Officer as part of the investigation.

With respect to the final dot point above, given the high risk to the School of not having a compliant Child Safety and Wellbeing Program, the outcome of these kinds of complaints will be reported to the School Board through its governance reporting processes.

Resources for Managing Child Safety and Wellbeing-Related Complaints

The [Complaints Handling Policy](#) provides guidance on complaints handling principles and a step-by-step guide to managing a complaint in general.

The National Office for Child Safety publishes a guide for complaints that involve children and young people: [Complaint Handling Guide: Upholding the rights of children and young people](#).

The [Child Safety and Wellbeing Reporting and Responding Obligations Policy](#), sets out procedures that will be followed for complaints about inappropriate conduct by Staff.

Internal Reviews of Child Safety and Wellbeing-Related Complaint Outcomes

If a complainant or other person involved in a child safety and wellbeing-related complaint (such as a staff member whose behaviour is the subject of the complaint, a student who is the victim of the alleged behaviour or their parent/carer) is not satisfied with its management or its outcome, they may request an internal review.

This review could be of the:

- procedures undertaken
- findings made
- disciplinary actions proposed or taken
- other outcomes (including a decision not to make a finding or to take disciplinary or other action).

Requests for internal reviews should be made to the Principal (or Deputy Principal – Learning and Teaching if the complaint relates to the Principal).



The Principal or their delegate (or the Deputy Principal – Learning and Teaching if the complaint relates to the Principal) undertakes these internal reviews.

External Reviews for Overseas Students

If an overseas student is not satisfied with the outcome of the School's internal complaints handling process, they may lodge an external appeal through the Overseas Students Ombudsman (OSO) 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 OSO are free. The contact details for the OSO are as follows:

- Email: ombudsman@ombudsman.gov.au
- Call: 1300 362 072 within Australia. Outside Australia call +61 2 6276 0111.
- Postal: Commonwealth Ombudsman, GPO Box 442 Canberra ACT 2601.
- Website: <https://www.ombudsman.gov.au/How-we-can-help/overseas-students>

The School agrees to be bound by the OSO's recommendations and will ensure that any recommendations made are implemented within 30 days of receipt of the report.

Record Keeping about Child Safety and Wellbeing-Related Complaints

Because of the confidentiality and privacy issues that arise with respect to child safety and wellbeing-related complaints, records of complaints that contain information about child safety incidents or concerns are not held within the School's general complaints handling record keeping system.

Child safety and wellbeing-related complaints are instead managed and documented in accordance with the School's *Child Safety and Wellbeing Record Keeping Policy*.

Child safety and wellbeing-related complaints are also recorded in a separate Child Safety and Wellbeing Complaints Register.

General Reviews of Child Safety and Wellbeing Complaints Management

The School regularly reviews child safety and wellbeing-related feedback, comments and complaints to ensure that any child safety-related feedback, comments or complaints from the School community members and relevant stakeholders are captured, analysed and acted on where appropriate.

In particular, child safety and wellbeing-related complaints are regularly analysed to identify causes and systemic failures to inform continuous improvement.

This policy is also regularly reviewed as part of the review of the Child Safety and Wellbeing Program.

For more information, refer to the *Child Safety and Wellbeing Regular Reviews and Continuous Improvement Policy*.



Policy Review

The School Board has strategically delegated aspects of its child safety and wellbeing policy review responsibilities to the School executive team, to support operational efficiency in policy development, while retaining ultimate oversight and approval authority for the Child Safety and Wellbeing Program.

All policies and procedures that make up the Child Safety and Wellbeing Program will be reviewed by the relevant approval authorities (School Board or executive team) **at least once every 2 years** or earlier if required, such as if a significant child safety incident occurs at the School or due to changes in legislation.

Version Control

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1.0	25.05.2023	Phong Pham	Approved
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