



## Complaints Handling Policy

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### Introduction

Strathcona Girls Grammar School (“Strathcona”) welcomes feedback from all members of the School community and takes all complaints or concerns that may be raised seriously. This Complaints Handling Policy outlines how complaints may be made and how they are managed by the School.

In this policy, the terms “staff” and “staff member” include all teaching and non-teaching staff, School Board and Board Committee members, volunteers, contractors and external providers.

### Purpose

The purpose of this policy is to set out Strathcona’s overarching framework for receiving, managing and resolving complaints in a fair, timely and transparent manner.

This policy supports a consistent and proportionate approach to complaints handling, promotes procedural fairness, and ensures that complaints are addressed in a way that is respectful, responsive and aligned with the School’s values and governance obligations.

### Scope

This policy applies to all complaints raised by members of the school community or the broader public in relation to Strathcona, its operations, services or activities.

This includes complaints made by, or on behalf of, students, parents or carers, staff, volunteers, contractors, external service providers, other school community members and members of the general public.

This policy applies to complaints about matters within the School’s control. Certain complaints may be managed under separate policies or procedures where required by law or where a more specific policy applies, including complaints involving child safety and wellbeing, which are managed in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#).

For the purposes of this policy, grievances are managed as complaints and addressed through the appropriate formal handling pathways

### Pre-complaint Matters

Pre-complaint matters (“concerns”), are issues raised with the School that do not meet the definition of a complaint or grievance. These matters are typically resolved through explanation, clarification or informal discussion and do not require formal complaint handling processes.

Where a concern escalates, remains unresolved, or gives rise to an expectation of formal response or investigation, it may be reclassified as a complaint or grievance and managed in accordance with this policy.



## What Is a Complaint?

A complaint is an expression of dissatisfaction made to Strathcona, in relation to the School, its operations, services or activities, or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.

Matters that are raised as concerns only, where no response or resolution is expected, are not considered complaints for the purposes of this policy.

A complaint may include an additional child safety and wellbeing element, which gives rise to further legislative, regulatory and governance obligations. In such cases, the complaint is managed in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#).

## Policy Statement

The School's systems for handling complaints are:

- fair, timely and proportionate, and support procedural fairness for all parties
- accessible to members of the school community and the general public
- transparent and consistent, with clear avenues for raising complaints
- informed by recognised complaints handling standards and guidance, including the Australian Standard for complaints management (AS 10002:2022) and the Australian Privacy Principles
- managed in a manner that respects confidentiality and privacy, in accordance with applicable privacy obligations
- regularly monitored and reviewed to support effective governance oversight and continuous improvement.

Complaints should be raised with the School as soon as reasonably practicable, and generally within 12 months. The School may consider complaints made outside this timeframe where it is reasonable to do so, including where consideration is required by law, having regard to the circumstances of the complaint, the nature and seriousness of the issues raised, any reasons for delay, and the School's ability to fairly assess and respond to the matter.

The School may take reasonable steps to manage complaints that are assessed as vexatious, unreasonable or made in bad faith, while ensuring that all complainants are treated fairly and that access to legitimate complaint pathways is not restricted.

There is no fee associated with making a complaint. Complaints may be made anonymously or using a pseudonym, noting that anonymity may limit the School's ability to fully investigate a complaint or provide feedback on its progress or outcome.

Responsibility for implementing this policy is allocated in the **Roles and Responsibilities** section and supported by relevant procedures and guidance.



## Roles and Responsibilities

The School Board is responsible for oversight of the School's complaints handling framework.

The Principal is responsible for the implementation of this policy and for ensuring that appropriate procedures, resources and delegations are in place to support the effective management of complaints.

Operational responsibility for receiving, managing and resolving complaints is assigned in accordance with procedures approved by the Principal from time to time.

Where a complaint includes a child safety and wellbeing component, roles and responsibilities are allocated in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#), which sets out the specific governance, reporting and accountability arrangements that apply to child safety and wellbeing-related complaints.

## Confidentiality and Privacy

The School manages complaints in a manner that respects confidentiality and privacy. Information relating to a complaint is handled sensitively and disclosed only on a need-to-know basis, in accordance with applicable privacy obligations and the School's [Privacy Policy](#).

The handling of complaints that include a child safety and wellbeing component is subject to additional confidentiality and information-sharing requirements, as set out in the [Child Safety and Wellbeing Complaints Management Policy](#) and associated procedures.

## Recordkeeping and Reporting

The School maintains appropriate records of complaints received and their management, in accordance with approved complaints handling procedures and applicable record-keeping obligations.

Complaints submitted through the School's online complaints notification form are treated as formal complaints and are recorded in the School's Complaints Register.

Some complaints may be raised and resolved informally. Where a matter is managed informally and resolved at that stage, it may not be recorded in the Complaints Register.

In some circumstances, a complaint may be received verbally or in writing. Depending on the nature of the complaint, where formal management is required, the complaint is recorded in the Complaints Register through manual entry by relevant school staff assigned with complaints handling responsibilities.

Information from the Complaints Register is reported to the Risk and Compliance Committee at the time of scheduled committee meetings where new complaint records have been registered, and is reported annually to the School Board to support governance oversight.

Complaints information may be monitored and analysed at an aggregate level to identify trends, systemic issues and opportunities for improvement, and to support continuous improvement.

Records relating to complaints that include a child safety and wellbeing component are maintained and reported in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#) and relevant child safety record-keeping requirements.



## Complaint Handling Procedures

Complaints are received, managed and resolved in accordance with the School's complaints handling procedures. These procedures are set out in the following appendices:

- [Appendix 1: Making an informal complaint](#)
- [Appendix 2: Making a formal complaint](#)
- [Appendix 3: Making a complaint about the Principal](#)
- [Appendix 4: Making a complaint about a Board or Board Committee member](#)
- [Appendix 5: Making a complaint to the Overseas Student Ombudsman](#)

## Policy review

This policy is reviewed at least every three years, or earlier if required due to changes in legislation, VRQA guidelines, the School's governance structure, or business requirements.

## Version Control

Version	Date	Author	Comments
1.0	01.04.2016	-	Approved as <b>Resolution of Grievances Policy</b>
2.0	01.05.2019	Complaints Manager	Approved as <b>Complaints and Grievances Policy and Procedures</b>
3.0	21.02.2023	Phong Pham	Approved as <b>Complaints Handling Policy</b>
4.0	20.03.2026	Phong Pham	Approved



## **Appendix 1: Making an informal complaint**

In most cases, complaints raised at the School can be resolved quickly through informal means. The steps below set out how an informal complaint may be raised and managed.

Where the complaint relates to the Principal, refer to [Appendix 3](#).

Where the complaint relates to a Board or Board Committee member, refer to [Appendix 4](#).

Where the complaint relates to child safety and wellbeing related complaint, refer to the [Child Safety and Wellbeing Complaints Management Policy](#).

### **Step 1: Raise the complaint**

Where appropriate, a complaint should first be raised directly with the relevant staff member / individual.

If the complaint relates to a matter where direct contact is not appropriate, or the person raising the complaint does not feel comfortable doing so, the complaint may proceed directly to Step 2.

### **Step 2: Seek informal assistance if needed**

If the matter is not resolved, or if direct contact is not appropriate, the complaint may be raised with the person's line manager, an appropriate School Leader or with Human Resources.

### **Step 3: Clarify what the person is seeking**

At this stage, the person raising the complaint may indicate whether they are:

- seeking informal resolution, or
- raising the complaint **for noting only** (i.e. to have the matter recorded and monitored, without seeking action at this stage).

This helps inform how the complaint is managed, but does not limit the School's ability to take further action where required.

### **Step 4: Informal resolution (where sought)**

Where informal resolution is sought and considered appropriate, the relevant line manager, School leader or Human Resources may, but is not limited to:

- discuss the complaint with the person raising it and, where appropriate, raise it with the relevant staff member or individual
- speak separately with the parties involved to seek resolution
- facilitate a meeting between the parties to support conciliation.

### **Step 5: For noting (where no resolution is sought)**

Where a complaint is raised **for noting only**, the matter may be documented by Human Resources as a file note and monitored.

Complaints recorded for noting may be reviewed if further information or related complaints arise.



### Step 6: Outcome

- Where an informal complaint is resolved, it is considered closed and is **not recorded** in the Complaints Register.
- Where a complaint is raised for noting, it is documented and monitored but is **not recorded** in the Complaints Register.
- If the complaint cannot be resolved informally, or if the person raising the complaint wishes to pursue the matter further, a **formal complaint** may be made in accordance with the School's complaints handling procedures.

### Important note

Regardless of whether a complaint is raised for noting or informal resolution, the School may take further action where required to meet its legal, safety or governance obligations.

This process is summarised in the following decision tree:

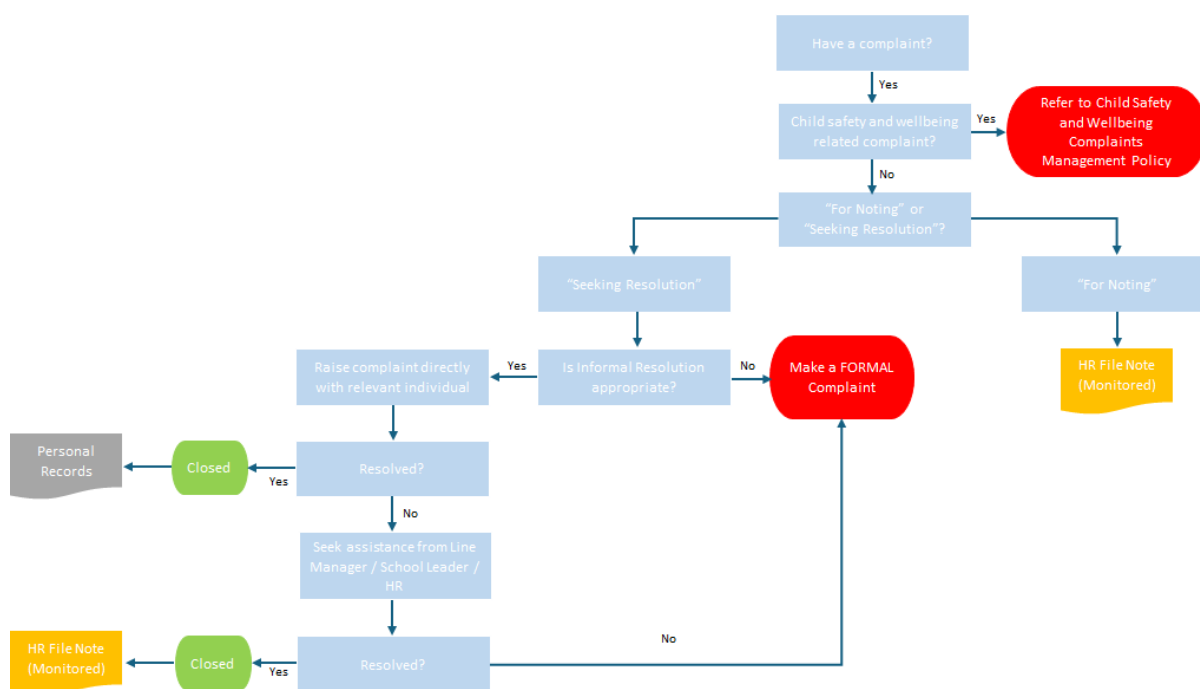


Diagram 1: Making an informal complaint



## Appendix 2: Making a formal complaint

The steps below set out how a formal complaint may be made and managed by the School.

Where the formal complaint relates to the Principal, refer to [Appendix 3](#).

Where the formal complaint relates to a Board or Board Committee member, refer to [Appendix 4](#).

Where the formal complaint relates to child safety and wellbeing related complaint, refer to the [Child Safety and Wellbeing Complaints Management Policy](#).

### Step 1: Decide to make a formal complaint

A formal complaint may be made where:

- a complaint cannot be resolved informally;
- informal resolution is not appropriate; or
- the complainant wishes to have the matter formally recorded and managed by the School.

### Step 2: Lodge the complaint

A formal complaint may be made either by:

- lodging the complaint using the online [Complaint Notification Form](#)
- writing to the School
- contacting the School by telephone.

### Step 3: Clarify what the complainant is seeking

At the time the complaint is lodged, the complainant may indicate whether they are:

- **seeking a resolution**, or
- raising the complaint **for noting** (i.e. to have the matter formally recorded, without seeking a resolution at this stage).

This assists the School in determining how the complaint is handled.

### Step 4: Complaint recorded

All formal complaints are recorded on the School's **Complaints Register**.

### Step 5: Handling the complaint

#### Where a resolution is sought

- The complaint is assessed and managed in accordance with the School's complaints handling procedures.
- This may include investigation and the provision of a resolution.
- The complainant is advised of the outcome.

#### Where the complaint is raised for noting

- The complaint is assessed and recorded.
- The matter is monitored, and no further action is taken at that stage unless required.



- The complaint remains visible for governance oversight and may be reviewed if further information or related complaints arise.

### Step 6: Outcome

- Where a complaint is resolved, it is considered closed.
- Where a complaint is recorded for noting, it remains on the Complaints Register for monitoring purposes and may be closed following consultation with the person making the complaint.

### Step 7: If the complainant is not satisfied

If the complainant is not satisfied with the handling or outcome of a formal complaint, further **review or external options** may be available in accordance with the School's procedures.

### Important note

Regardless of whether a formal complaint is raised for noting or to seek a resolution, the School may take further action where required to meet its legal, safety or governance obligations.

This is summarised in the following decision tree:

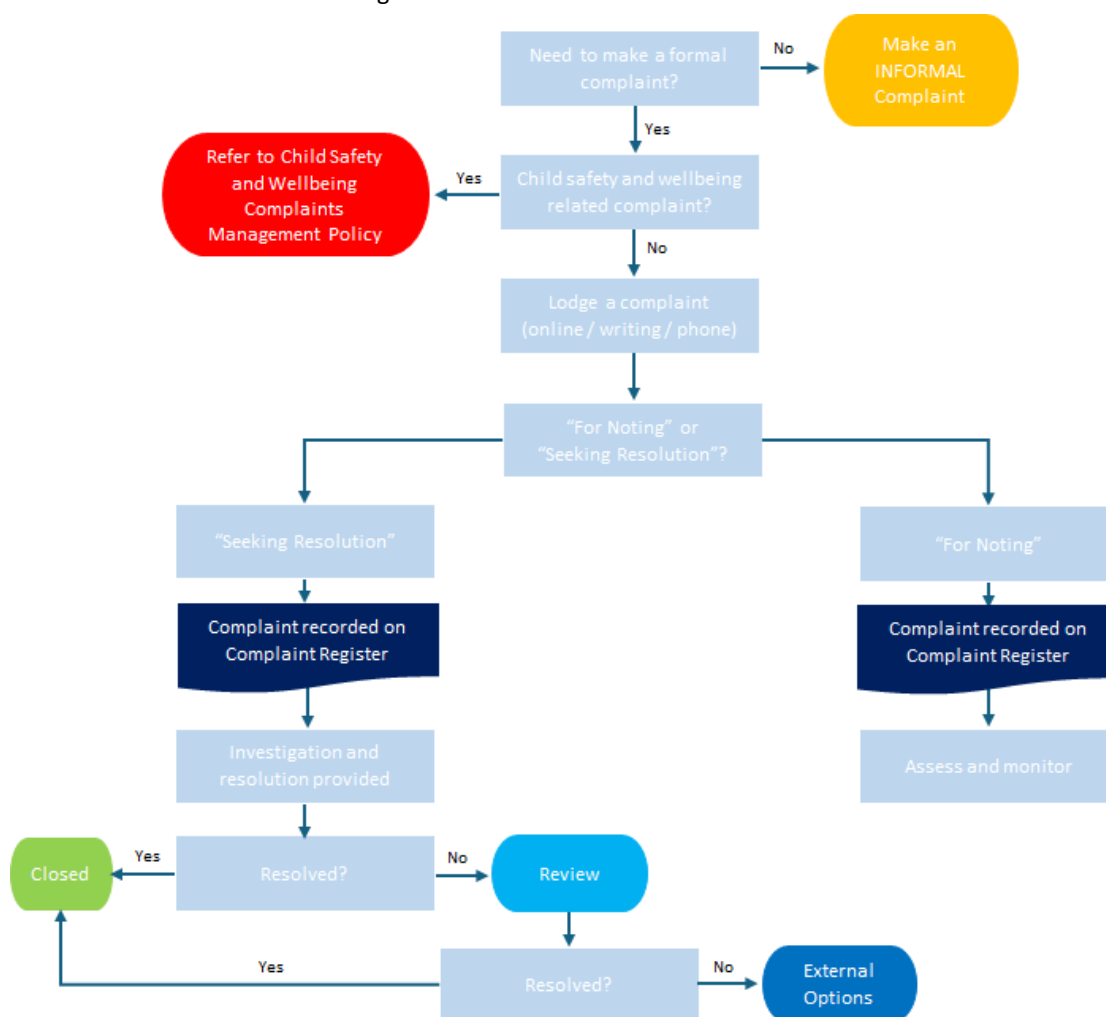


Diagram 2: Making a formal complaint



## Appendix 3: Making a complaint about the Principal

This appendix sets out how a complaint about the Principal may be made and how such complaints are handled. Complaints about the Principal are raised through the same **informal** and **formal** pathways as other complaints but are subject to additional arrangements to ensure independence, procedural fairness and appropriate governance oversight.

### Step 1: Decide how to raise the complaint

A complaint about the Principal may be raised:

- informally, where the matter is suitable for informal management; or
- formally, where:
  - the complaint cannot be resolved informally,
  - informal resolution is not appropriate, or
  - the complainant wishes the matter to be formally recorded.

Where a complaint relates to child safety or wellbeing, it must be managed in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#).

### Step 2: Making an informal complaint about the Principal

Where an informal approach is appropriate, complaints about the Principal should not be raised directly with the Principal.

Instead, informal complaints about the Principal should be raised through Human Resources.

Informal complaints about the Principal may be raised:

- for noting, where the complainant wishes the complaint to be documented and monitored without seeking action at that stage; or
- seeking informal resolution, where the complainant wishes the complaint to be addressed informally.

Informal complaints about the Principal are managed in accordance with [Appendix 1: Making an informal complaint](#), subject to the additional handling arrangements that apply to complaints involving the Principal.

### Step 3: Making a formal complaint about the Principal

A formal complaint about the Principal may be made by:

- lodging the complaint using the School's online [Complaint Notification Form](#)
- writing to the School; or
- contacting the School by telephone.

At the time the complaint is lodged, the complainant may indicate whether they are:

- seeking a resolution; or
- raising the complaint for noting (i.e. to have the matter formally recorded, without seeking a resolution at that stage).

All formal complaints about the Principal are recorded on the School's Complaints Register.



Formal complaints about the Principal are managed in accordance with [Appendix 2: Making a formal complaint](#), subject to the additional handling arrangements that apply to complaints involving the Principal.

#### **Step 4: Independent handling and assessment**

To ensure independence and avoid conflicts of interest:

- the Principal has **no involvement** in receiving, assessing or handling a complaint about themselves;
- complaints about the Principal are subject to **independent assessment** to determine the appropriate handling pathway; and
- complaints are handled proportionately, having regard to the nature of the complaint and the complainant's stated intent.

Where a complaint is raised **for noting**, it is assessed and monitored.

Where a complaint is raised **seeking resolution**, it is managed in accordance with the School's complaints handling procedures, which may include investigation and resolution.

#### **Step 5: Notification of the Principal**

The Principal is **not notified** of a complaint at the time it is received.

The Principal is notified **only after**:

- an independent assessment has occurred; and
- the handling pathway has been determined.

Notification occurs before any response is sought from the Principal, to ensure procedural fairness.

#### **Step 6: Governance oversight**

Complaints about the Principal are managed under arrangements that ensure appropriate governance oversight. Where required, matters may be escalated for Board-level consideration in accordance with the School's governance arrangements.

#### **Important note**

Regardless of whether a complaint about the Principal is raised informally or formally, and regardless of whether it is raised for noting or seeking resolution, the School may take further action where required to meet its legal, safety or governance obligations.



## Appendix 4: Making a complaint about a Board or Board Committee member

This appendix sets out how a complaint about a **School Board member** or **Board Committee member** may be made and how such complaints are handled. Complaints about Board members are raised through the same informal and formal pathways as other complaints but are subject to additional arrangements to ensure independence, procedural fairness and appropriate governance oversight.

### Step 1: Decide how to raise the complaint

A complaint about a School Board or Board Committee member may be raised:

- informally, where the matter is suitable for informal management; or
- formally, where:
  - the complaint cannot be resolved informally,
  - informal resolution is not appropriate, or
  - the complainant wishes the matter to be formally recorded.

Where a complaint relates to child safety or wellbeing, it must be managed in accordance with the [Child Safety and Wellbeing Complaints Management Policy](#).

### Step 2: Making an informal complaint about a Board or Board Committee member

Informal complaints about a Board or Board Committee member should **not** be raised directly with the subject of the complaint.

Instead, informal complaints about Board or Board Committee members may be raised through **Human Resources** or another appropriate School contact.

Informal complaints about a Board or Board Committee member may be raised:

- for noting, where the complainant wishes the complaint to be documented and monitored without seeking action at that stage; or
- seeking informal resolution, where the complainant wishes the complaint to be addressed informally.

Informal complaints about Board or Board Committee members are managed in accordance with [Appendix 1: Making an informal complaint](#), subject to the additional handling arrangements set out below.

### Step 3: Making a formal complaint about a Board or Board Committee member

A formal complaint about a Board or Board Committee member may be made by:

- lodging the complaint using the School's online [Complaint Notification Form](#)
- writing to the School; or
- contacting the School by telephone.

At the time the complaint is lodged, the complainant may indicate whether they are:

- seeking a resolution; or
- raising the complaint for noting (i.e. to have the matter formally recorded, without seeking a resolution at that stage).



All formal complaints about Board or Board Committee members are recorded on the School's Complaints Register.

Formal complaints about Board or Board Committee members are managed in accordance with [Appendix 2: Making a formal complaint](#), subject to the handling arrangements set out below.

#### **Step 4: Independent handling and assessment**

To ensure independence and avoid conflicts of interest:

- the subject Board or Board Committee member has **no involvement** in receiving, assessing or handling the complaint;
- complaints about Board or Board Committee members are subject to **independent assessment** to determine the appropriate handling pathway; and
- complaints are handled proportionately, having regard to the nature of the complaint and the complainant's stated intent.

Where a complaint is raised **for noting**, it is assessed and monitored.

Where a complaint is raised **seeking resolution**, it is managed in accordance with the School's complaints handling procedures, which may include investigation and resolution.

#### **Step 5: Governance oversight**

Complaints about School Board or Board Committee members are handled under **Board level governance arrangements** to ensure independence and procedural fairness.

- The subject Board or Board Committee member must not participate in any discussion or decision making relating to the complaint.
- Where appropriate, the handling pathway is determined by the **Board Chair** or another non-conflicted Board member.
- Where a complaint involves the Board Chair, the Board determines the appropriate handling arrangements.

#### **Important note**

Regardless of whether a complaint about a School Board or Board Committee member is raised informally or formally, and regardless of whether it is raised for noting or seeking resolution, the School may take further action where required to meet its legal, safety or governance obligations.



## **Appendix 5: Making a complaint to the Overseas Student Ombudsman**

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 latest contact details for the OSO is available [here](#).

Further information for Overseas Students on the OSO is available [here](#).

To make a complaint with the OSO, the online OSO Complaint Form is available [here](#).