

Policy No. 6.0

COMPLAINTS HANDLING POLICY

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Complaints Handling Policy

Purpose:	The purpose of this policy is to provide written processes about receiving, assessing, investigating and otherwise dealing with complaints. ¹	
Scope:	Any person directly affected by the subject of a complaint. Examples may include staff, students or a student's parent or guardian, contractors, or community members.	
Status:	Approved	Supersedes: GCC Complaints Handling Policy 18 February 2026
Authorised by:	GCC Board – Governing Body	Date of Authorisation: 7 July 2026
References:	• <i>Child Safe Organisations Act 2024</i> (Qld) • <i>Education (Accreditation of Non-State Schools) Regulation 2017</i> (Qld) • <i>Education Services for Overseas Students Act 2000</i> and National Code • Standards Australia, AS 10002:2022 Guidelines for complaint management in organizations (ISO 10002:2018 NEQ) • GCC Reporting Concerns of Harm and Abuse Policy • GCC Student Safety and Wellbeing Policy • GCC Student Behaviour Policy • <u>GCC Staff</u> Code of Conduct • GCC Workplace Bullying Policy • GCC Privacy Policy • GCC Board Charter • GCC Constitution • GCC Student Bullying Policy • GCC Work Health and Safety Policy • GCC Disability Discrimination Policy	
Review Cycle:	Annually	Next Review Date: 7 July 2027 or as required
Policy Owner:	GCC Board – Governing Body	

¹ *Education (Accreditation of Non-State Schools) Regulations 2017, s.7*

Definitions

Complainant	The person, organisation or their representative making a complaint. ²
Complaint	An expression of dissatisfaction made to or about the school, related to the school's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. ³
Formal Complaint	A complaint about a matter that is serious, complex or may pose a threat to the health and safety of any person. Examples include serious allegations or breaches of policy, complaints against a senior staff member, including the principal or an informal complaint that could not be resolved informally or allegations of reportable conduct involving a worker. Assessment of the complaint is required by Principal or member of Leadership Team.
Informal Complaint	A complaint about a matter that is likely to be simple, straight forward, easily manageable, or minor, where a simple or quick resolution is appropriate such as discussion of the matter with a relevant staff member.
Respondent	The person who is referred to in a complaint by a complainant as the person responsible for their concerns or who can best respond to their concern.
Worker	Has the same meaning as section 8 of the <i>Child Safe Organisations Act 2024</i> . A worker is a person who performs work of any kind for the school, including staff, volunteers, contractors, subcontractors, consultants, labour-hire workers, governing body members, and religious leaders.

² Standards Australia, AS 1002:2022 Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.2

³ Standards Australia, AS 1002:2022 Guidelines for complaint management in organizations (ISO 10002:2018, NEQ), s.4.3

Policy Statement

Gulf Christian College acknowledges the right of students, parents/guardians, staff and others to complain when dissatisfied with the College's services, including an action, inaction or decision of the College. The College encourages constructive criticism and complaints. Gulf Christian College is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way.

Gulf Christian College will ensure staff can recognise, receive, and appropriately refer complaints to the informal or formal complaints procedure.

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

Gulf Christian College promotes a safe, inclusive and culturally responsive environment for all students, ensuring their safety and wellbeing are prioritised. Gulf Christian College is committed to students exercising their right to speak up and participate in school processes and decisions that affect them.

Gulf Christian College recognises that some complaints may raise issues of child protection or reportable conduct involving workers. These matters will be managed in accordance with relevant legislation and the College's Reporting Concerns of Harm and Abuse Policy and Student Safety and Wellbeing Policy, including compliance with the *Reportable Conduct Scheme*.

Our Statement of Commitment

Gulf Christian College is dedicated to fostering a learning environment where every student feels safe, supported, and protected from foreseeable harm. We place the highest importance on student wellbeing and do not tolerate any form of abuse or harm. In line with the *Child Safe Organisations Act 2024 (QLD)*, we uphold the Child Safe Standards and the Universal Principle to ensure our College remains a respectful, inclusive, and accountable community. We actively listen to students, value their perspectives, and encourage them to be involved in decisions that influence their school experience.

Our commitment extends to ensuring the safety and inclusion of all students, including those from diverse cultural backgrounds, students with disability, LGBTQIA+ students, and any student who may be experiencing vulnerability. We also affirm our strong commitment to the cultural safety of Aboriginal and Torres Strait Islander students, ensuring their identities, histories, cultures, and connections to Country are honoured, respected, and embedded within our College environment.

Our Child Safe Standards

At Gulf Christian College we:

1. Integrate child safety into our leadership, decision-making, and everyday practices.
2. Ensure children and young people are informed, heard, and supported to speak up.
3. Partner with families and our wider community in matters relating to student safety.
4. Promote equity, inclusion, and cultural safety for every student.
5. Carefully select, screen, train, and support all staff and volunteers.
6. Maintain clear, child-centred reporting and complaint procedures.

7. Provide continuous safeguarding education and professional learning for our team.
8. Create and monitor safe physical spaces and online environments.
9. Regularly review, assess, and strengthen our child safeguarding systems.
10. Clearly document our child safety commitments and make this information accessible to the public.

Complaints Handling Principles

Gulf Christian College will manage complaints according to the following (which include principles of procedural fairness):

- complaints will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe
- complaints should be resolved with as little formality and disruption as possible, having regard to the nature of the complaint
- interested parties to the complaint (for example, the complaint and any respondent) will be heard and/or may provide relevant information in relation to the complaint
- confidentiality and privacy will be maintained as much as possible
- a child-centred approach will be maintained, and all complaints will be managed in a manner that prioritises the student's safety, wellbeing, and voice
- a trauma-informed and culturally safe approach to managing complaints will be prioritised
- the complainant and any respondent will be offered support as appropriate
- victimising behaviour towards a complainant, respondent or other people associated with the complaint, will not be tolerated
- complainants who lodge a complaint on reasonable grounds will not suffer any other reprisals on the basis of the lodging the complaint.

Complaints that may be Resolved under this Policy

Gulf Christian College encourages anyone who feels impacted by an issue involving the College to file a complaint. Complaints can address matters such as:

- the College, its staff or students having done something wrong
- the College, its staff or students having failed to do something they should have done
- the College, its staff or students having acted unfairly or impolitely
- issues of student or staff behaviour that are contrary to the GCC Staff Code of Conduct Policy and/or GCC Student Behaviour Policy, including inappropriate staff conduct as reported by a student.⁴
- issues related to learning programs, assessment and reporting of student learning
- issues related to communication with students or parents or between staff
- issues related to College fees and payments
- general administrative issues

⁴ Education (Accreditation of Non-State Schools) Regulation 2017 s.16(2)(a)

- issues relating to non-compliance with a process outlined in College policies or procedures, for example the Reporting Concerns of Harm and Abuse Policy, Disability Discrimination Policy, or Privacy Policy.⁵

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

Issues Outside this Policy

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

- Child protection concerns including allegations of sexual abuse, likely sexual abuse or harm to children should be dealt in accordance with the College's Reporting Concerns of Harm and Abuse Policy.
- Allegations that may constitute *reportable conduct* involving a worker (as defined under the *Child Safe Organisations Act 2024* (Qld)) will not be managed solely under this policy and must be managed in accordance with the College's Reporting Concerns of Harm and Abuse Policy and the College's obligations under the *Reportable Conduct Scheme*, including notification to the Queensland Family and Child Commission within legislated timeframes.
- Student bullying complaints should be dealt with under GCC Student Bullying Policy or Student Behaviour Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the GCC Suspension and Exclusion Policy.
- Student or staff violence or criminal matters should be directed to the Principal who will involve the Police as appropriate.
- Disputes relating to a staff member's employment should be directed to their manager and dealt with under the enterprise agreement and/or employment law.
- Disputes between board members should be dealt with in accordance with the GCC Board Charter.
- Formal legal proceedings should be managed as appropriate in the circumstances.

Responsibilities

College

The College has the following roles and responsibilities:

- develop, implement, promote and act in accordance with the College's Complaints Handling Policy
- appropriately communicate the College's Complaints Handling Policy to students, parents and staff
- ensure that the Complaints Handling Policy and processes are readily accessible by staff, students and parents

⁵ Education (Accreditation of Non-State Schools) Regulation 2017 s.16(5)

- upon receipt of a complaint, manage the complaint in accordance with the Complaints Handling Policy
- ensure that appropriate support is made available to all parties to a complaint
- take appropriate action to prevent victimisation or action in reprisal against the complainant, respondent or any person associated with them
- appropriately implement remedies
- appropriately train relevant staff
- keep records
- conduct a review/audit of the Complaints Register at regular intervals
- report to the College's insurer when relevant.

All Parties to a Dispute

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

- comply with the College's Complaints Handling Policy
- provide complete and factual information in a timely manner
- not provide deliberately false or misleading information
- not make frivolous or vexatious complaints or retaliatory complaints
- act in good faith and maintain a mutually beneficial relationship of trust and cooperation
- act in a calm, courteous and non-threatening manner
- acknowledge that the common goal is to achieve an outcome acceptable to all parties
- recognise that all parties have rights and responsibilities which must be balanced
- maintain and respect the privacy and confidentiality of all parties
- not victimise or act in reprisal against any party to the dispute or any person associated with them.

Staff Receiving and/or Managing Complaints

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

- act in accordance with the College's Complaints Handling Policy
- refer the complainant to the College's Complaints Handling Policy and processes and provide additional information as necessary
- maintain confidentiality as far as possible
- keep appropriate records
- forward complaints to more senior staff, including the Principal, if the complaint cannot be resolved at the initial level or if it involves serious issues that require escalation
- identify and escalate matters that may involve child safety concerns or reportable conduct by a worker, in accordance with the College's Reporting Concerns of Harm and Abuse Policy
- not victimise or act in reprisal against the complainant, respondent or any person associated with them.

Implementation

Gulf Christian College is committed to raising awareness of the process for resolving complaints at the College, including by the development and implementation of this policy and via the clear support and promotion of the policy. This policy will be promoted with all staff during their initial Induction and then annually through our Staff Retreat. This policy will be promoted with students and families via our fortnightly newsletter and also published on our GCC website for easy accessibility. GCC website address is: www.gulfcc.qld.edu.au

Gulf Christian College is also committed to regular training of employees on the implementation of this policy. Training with employees will occur during New Staff Induction Processes and annually thereafter generally during our annual Staff Retreats.

Complaint Register

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

The complaint register will be stored securely.

All complaints shall be entered onto the complaint register as soon as practicable after the complaint is received. The complaint register will not contain complaints about the Principal. Records of complaints about the Principal will be maintained by the Board with access restricted to the Board.

To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire complaint register will be limited to the Principal, Board Chair and other specific senior staff.

The Principal may authorise the sharing of specific, relevant entries from the complaint register with other designated staff members (such as the senior leadership team), provided measures are taken to protect the confidentiality of all parties involved, particularly ensuring that respondents to a complaint do not gain inappropriate access to information about the allegations against them.

Related Legislation, Policies & Other Resources

- *Australian Education Act 2013* (Cth)
- *Australian Human Rights Commission Act 1986* (Cth)
- *Disability Services Act 2006* (Qld)
- *Education (Accreditation of Non-State Schools) Act 2017* (Qld)
- *Education (Accreditation of Non-State Schools) Regulation 2017* (Qld)
- *Education (General Provisions) Act 2006* (Qld)
- *Privacy Act 1988* (Cth)
- GCC Enrolment Policy
- GCC Parent/Student Code of Conduct (noted in Parent Handbook)
- GCC Staff Code of Conduct
- GCC Statement of Commitment to Student Safety and Wellbeing
- GCC Volunteer-External Youth Support Policy
- QFCC Guidelines for Implementing the Child Safe Standards in Queensland

Complaint Handling Procedure

1. Lodging a Complaint

- a) Complaints can be lodged with the most appropriate staff member at the local level, for example, the initial contact point for many complaints is the student's relevant classroom teacher.
- b) Complaints about the Principal must be lodged with the Board via the Board Chair's email address: Ps Kerry Evans – kerrye.tribe@gmail.com
- c) Allegations of *reportable conduct* by the Principal can be lodged with the Board via the Board Chair's email address: Ps Kerry Evans – kerrye.tribe@gmail.com
- d) In addition to 1.a) and c) allegations of reportable conduct by a worker or the Principal can be made directly to the [Queensland Family and Child Commission](#).
- e) Complaints can be lodged through various methods, including:
 - i. Phone: 07 4745 1180
 - ii. Email: principal@gulfcc.qld.edu.au or business@gulfcc.qld.edu.au
 - iii. In-person (by appointment): Mr Andrew Evetts (Principal)
- f) If the complainant is unsure where to direct their complaint, they can contact the College administration office for guidance.
- g) If the complainant is uncomfortable directing the complaint to the most appropriate member at the local level, or wants to make a formal complaint, they can submit a complaint by:
 - i. Completing the online complaint form (available on the College website) www.gulfcc.qld.edu.au
 - ii. Using the anonymous reporting system (eg. anonymous letter posted to PO Box 210, Normanton Qld 4890)
 - iii. Other method e.g. report to member of the executive, via the email business@gulfcc.qld.edu.au
- h) Where an anonymous complaint is lodged, the school will follow the complaints handling policy, when there is sufficient information to do so.

2. Acknowledgement, Assessment and Referral

The staff member receiving the complaint will:

- a) acknowledge the complaint within two (2) business days, outlining the next steps and where possible the estimated timeframes.
- b) assess the complaint, using the definitions of informal and formal complaints in this policy, and refer the complaint to the informal or formal complaints process.
- c) as part of the assessment, the staff member must consider whether the complaint raises a potential reportable conduct allegation involving a worker.
- d) where this threshold may be met, the matter must be immediately escalated and managed under the College's Reporting Concerns of Harm and Abuse Policy, including consideration of notification obligations to the Queensland Family and Child Commission.

3. Registration and Support

- a) The recipient of the complaint will promptly enter it onto the complaints register, regardless of whether it proceeds through the informal or formal process.
- b) The recipient of the complaint will offer support to the complainant as appropriate, which may include assistance with completing forms or understanding procedures.

If a student is a complainant, respondent or victim, or the child of a complainant, respondent or victim of a matter being managed through this policy, the College may offer the student support where appropriate e.g. discussing suitable adjustments with parents/caregivers.

4. Informal Complaints Handling Process

- a) The informal process is designed to resolve issues promptly and collaboratively at the local level.
- b) It may involve constructive discussion and negotiation between the complainant and the relevant staff member(s).
- c) If the complaint cannot be resolved informally, it will be escalated to the formal process.

5. Formal Complaints Handling Process

- a) The formal process begins with the assessment of the complaint by a designated staff member (e.g., a member of the senior leadership team or the board chair for complaints against the principal)
- b) The staff member may gather additional information through investigation, interviews, or evidence review. The staff member may consult with appropriate members of the student's or the family's community
- c) The staff member will determine appropriate action, which may include:
 - i. Mediation
 - ii. Disciplinary measures
 - iii. Implementation of policy changes
 - iv. Referral to external agencies (e.g., police)
 - v. Provision of written updates to the complainant throughout the process
 - vi. Other actions the Principal or suitable person of authority may determine as appropriate in the circumstances.

6. Complaint Closure

- a) The complaint register will be updated with the date the complaint is closed and a brief summary of the outcome.
- b) The complainant will receive written notification of the outcome and any actions taken where appropriate.

7. Appeals Process

- a) Complainants may appeal the outcome of a complaint by writing to:
 - i. the Principal (for complaints not previously managed by the Principal,)
 - ii. the Board Chair (for complaints previously managed by the Principal, or complaints about the Principal).

ANNEXURE A

FORMAL COMPLAINTS FORM

For completion by person making complaint

Date:

Complete this form if you have a concern about Gulf Christian College. Please consult the Complaints Handling Policy before completing and submitting the form. While principles of confidentiality are observed in handling complaints, the disclosure of personal or identifying information to relevant staff will generally be necessary in responding to your complaint.

Please ensure you have read how to resolve any issues informally before you complete this form.

INCIDENT DETAILS:

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Details about receiving complaint (For completion by office staff)

Date of receipt of complaint: _____

Name of person who received the
Complaint at the first instance: _____

The complaint was referred to: ☐ The Principal
☐ The Board Chair

Name of who finalised this complaint: _____

Date of filing: _____

ANNEXURE B

CONFIDENTIALITY PROTOCOL FOR PARTIES AND WITNESSES

This interview is being conducted by Gulf Christian College into due to a formal complaint and will be carried out based on the principles of procedural fairness and in good faith.

PLEASE NOTE THE FOLLOWING

1. True and accurate disclosure and co-operation is essential in establishing the facts.
2. Confidentiality is to be maintained at all times to protect privacy and avoid defamation. Only people required to know the information (Principal, Board Chair and Complaints/Liaison Officer) should be told the details of the alleged problem. No discussion about the fact that there has been an interview or what has been said at the interview must occur.
3. If confidentiality is breached, you could be sued for defamation.
4. The College will regard breaches of confidentiality as serious and may take disciplinary action.
5. You are requested to proceed in a professional manner and observe appropriate workplace behaviours. No "victimisation" of anyone must arise during or after the investigation of this complaint.
6. Concise notes will be taken of what you say and will be shown to you at the end of the interview for accuracy.
7. You can contact your support person / union member at any stage of the process. You have been advised of your right to have a support person present at this or any subsequent interview.

I have read and understand this protocol.

Name

Telephone

Signed

Date

Complaints Manager

Date

Signed

ANNEXURE C

FORMAL COMPLAINTS CHECKLIST

For Complaints / Liaison Officer

Name of Matter _____

Investigator is to check that the following has been complied with:

1. Process has been explained to both parties and witnesses.
2. Confidentiality has been explained.
3. The process of procedural fairness has been explained.
4. The role of the support person has been explained.
5. The investigation will be carried out in good faith.
6. All persons will be treated with respect.

In respect of the process of investigation explain the normal sequence to be followed to each of the parties.

The sequence **USUALLY** is:

- Respondent is made aware of complaint and the nature of the complaint, with such particulars as may be known at that time and at the earliest opportunity.
- Confirmation of existence of the complaint and the pending investigation will be given to the parties, in writing.
- Complainant is asked for particularised allegations in writing or interview.
- Respondent provided with particularised allegations in writing as soon as they are available.
- Relevant witnesses interviewed.
- Signing of confidentiality protocol (Annexure B) requested of all witnesses.
- Complaints / Liaison Officer weighs evidence and writes report with findings and reasons.
- Findings must reflect the evidence.
- Report provided to the employer.
- Parties do not receive the names of witnesses or witness statements in this College process.
- The parties may receive feedback derived from the report by the Principal or their delegate.
- Decision of Employer / Board: re outcomes.
- The Principal may meet with each party to inform them of the outcomes decided.
- Complainant and respondent will also be informed in writing that the complaint has been investigated and dealt with accordingly.
- Remedies/consequences/outcomes put into action by employer