



COMPLAINTS HANDLING POLICY

CDR-001

Document title	Complaints Handling Policy
Document ID	CDR-001
Version	8.0
Status	Current
Effective date	27 July 2026
Purpose	The purpose of this policy is to provide written processes about receiving, assessing, investigating and otherwise dealing with complaints.
Scope	Students, parents/guardians and employees, including full-time, part-time, permanent, fixed-term and casual employees, as well as contractors, volunteers and people undertaking work experience or vocational placements.
Authorised by	St Patrick's College Townsville Limited (Governing Body) Date of Authorisation: October 2019
References	Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland); Fair Work Act 2009 (Commonwealth); Work Health and Safety Act 2011 (Queensland); Privacy Act 1988 (Commonwealth); Anti-Discrimination Act 1991 (Queensland) (as amended by the Respect at Work and Other Matters Amendment Act 2024 (Queensland)); Australian Human Rights Commission Act 1986 (Commonwealth); Sex Discrimination Act 1984 (Commonwealth); Age Discrimination Act 2004 (Commonwealth); Disability Discrimination Act 1992 (Commonwealth); Racial Discrimination Act 1975 (Commonwealth); Child Safe Organisations Act 2024 (Queensland); Child Safe Organisations Regulation 2025 (Queensland); Child Protection Act 1999 (Queensland); Education (General Provisions) Act 2006 (Queensland); Standards Australia, Guidelines for complaint management in organisations (AS 10002:2022); Catholic Employing Authorities Single Enterprise Collective Agreement – Religious Institute Schools of Queensland 2023–2026; Complaint and Dispute Resolution Procedure; CP-006 Child Safety and Wellbeing Policy; CP-001 Reportable Conduct Procedure; CP-007 Reportable Conduct Scheme Governance and Delegation Statement; Work Health and Safety Policy; Workplace Bullying Policy; Privacy Policy; Sexual Harassment Policy; Staff Code of Conduct; Student Code of Conduct; Respectful Relationships, Anti-Bullying, Harassment and Discrimination Policy.
Review date	Annually Review due: 27 July 2027
Policy owner	St Patrick's College Townsville Limited (Governing Body)



POLICY STATEMENT

St Patrick's College Townsville 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. St Patrick's College Townsville is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way. St Patrick's College Townsville will ensure employees can recognise, receive, and appropriately refer complaints to the informal or formal complaints procedure.

St Patrick's College Townsville recognises that time spent on handling complaints can be an investment in better service to students and parents/guardians and a better culture for employees, and views complaints as part of an important feedback and accountability process.

DEFINITIONS

Terms used in this Policy:

- **Complaint:** an expression of dissatisfaction made to or about the College, related to the College's services, staff or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.
- **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.
- **Formal Complaint:** a complaint about a matter that is serious or complex, or that an informal complaint has escalated into because it could not be resolved informally. A formal complaint is assessed by the appropriate College Leadership Team member. Refer also to *Issues Outside this Policy*. Where the matter involves an allegation of reportable conduct under the Child Safe Organisations Act 2024 (Queensland), the matter is dealt with under CP-001 Reportable Conduct Procedure, not as a Formal Complaint under this Policy.
- **Complainant:** the person, organisation or their representative making a complaint.
- **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.

COMPLAINT HANDLING PRINCIPLES

St Patrick's College Townsville 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 complainant 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;
- 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 lodging the complaint.



Complaints that may be Resolved under this Policy

St Patrick's College Townsville encourages anyone who feels impacted by an issue involving the College to file a complaint. Complaints can address matters such as:

- the College, its employees or students having done something wrong;
- the College, its employees or students having failed to do something they should have done;
- the College, its employees or students having acted unfairly or impolitely;
- issues of student or employee behaviour that are contrary to the relevant Code of Conduct, including inappropriate staff conduct as reported by a student;
- issues related to learning programs, assessment and reporting of student learning;
- issues related to communication with students or parents/guardians or between employees;
- issues related to school fees and payments;
- general administrative issues;
- issues relating to non-compliance with a process outlined in the College policies or procedures, for example the Child Safety and Wellbeing Policy (CP-006), Anti-Discrimination Policy, Sexual Harassment Policy, or Privacy Policy. Where the matter involves an allegation that meets the reportable conduct threshold, see *Issues Outside this Policy* below.

Student complaints may be brought by students or by parents/guardians 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 any harm to a child, are dealt with under the **Child Safety and Wellbeing Policy (CP-006)** and the **Student Protection Procedure (CP-004)**.
- Allegations of *reportable conduct*, conduct by a worker that meets any of the six categories defined at section 26(1) of the Child Safe Organisations Act 2024 (Queensland), are dealt with under the **Reportable Conduct Procedure (CP-001)**. Where the allegation concerns the Principal, you may report directly to the Queensland Family and Child Commission under section 33(2)(b) of that Act. The alternate arrangements are set out in CP-007.
- Sexual harassment complaints are dealt with under the **Sexual Harassment Policy**. Where the conduct also meets the reportable conduct threshold (for example, where it involves a child or a worker who is a child), both this carve-out and the carve-out above apply, and the matter is managed under CP-001 and the Sexual Harassment Policy concurrently.
- Workplace bullying complaints are dealt with under the **Workplace Bullying Policy**.
- Student bullying complaints should be dealt with under the Respectful Relationships, Anti-Bullying, Harassment and Discrimination Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the Enrolment Agreement, Student Code of Conduct and Respectful Relationships, Anti-Bullying, Harassment and Discrimination Policy.
- Student or employee violence or criminal matters should be directed to the Principal who will involve the Police as appropriate.
- Disputes between Board Members should be dealt with in accordance with the Board Constitution.
- Formal legal proceedings should be managed as appropriate in the circumstances.
- Privacy complaints are dealt with under the **Privacy Policy**. Where the College has not been able to resolve a privacy concern internally, the complainant retains the right to make a complaint to the Office of the Australian Information Commissioner under the Privacy Act 1988 (Commonwealth).
- Complaints relating to the education and training services provided by the College to an overseas student should be dealt with in accordance with the Education Services for Overseas Students Act 2000



(Commonwealth) and National Code and the College's Overseas Student's Complaints and Appeals Policy and Process.

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/guardians and employees;
- ensure that the Complaints Handling Policy is readily accessible by staff, students and parents/guardians;
- 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 employees;
- keep records;
- conduct a review/audit of the Complaint Register at regular intervals;
- report to the College's insurer when that is relevant.

Complainant

The complainant is expected to:

- provide complete and accurate information about the matter, to the best of their knowledge;
- not provide deliberately false or misleading information;
- not make frivolous, vexatious or retaliatory complaints;
- act respectfully and not threaten or intimidate any person involved in the complaint;
- maintain confidentiality during the resolution process;
- not victimise or act in reprisal against the respondent or any person associated with them.

Respondent

The respondent is expected to:

- comply with the College's Complaints Handling Policy and Complaint and Dispute Resolution Procedure;
- provide complete and factual information in a timely manner;
- not provide deliberately false or misleading information;
- act in good faith and engage cooperatively with the resolution process;
- act in a calm, courteous and non-threatening manner;
- acknowledge that a common goal is to reach an outcome that fairly addresses the complaint;
- maintain and respect the privacy and confidentiality of all parties;
- not victimise or act in reprisal against the complainant or any person associated with them.

Employees Receiving and/or Managing Complaints

Employees 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 provide additional information as necessary;
- maintain confidentiality as far as possible;
- on receiving a complaint, check whether the matter falls under *Issues Outside this Policy* before initiating any informal resolution. If it does, refer the matter to the relevant procedure (in particular, refer any allegation of reportable conduct directly to the Principal under CP-001. Do not invite the complainant to approach the alleged respondent);
- keep appropriate records;



- forward complaints to more senior employees, including the Principal, if the complaint cannot be resolved at the initial level or if it involves allegations of serious issues that require the involvement of more senior employees;
- not victimise or act in reprisal against the complainant, respondent or any person associated with the complaint.

IMPLEMENTATION

St Patrick's College Townsville 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 is achieved through communication to families from time to time, for example College Newsletters, and having the policy available on the College website.

St Patrick's College Townsville is also committed to regular training of employees on the implementation of this policy. This is achieved by highlighting the policy as part of the induction of new staff and including it in compulsory annual compliance training.

COMPLAINT REGISTER

St Patrick's College Townsville will maintain a Complaint Register with details such as the date, source and description of complaints, the employee 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. Where a complaint about the Principal also meets the reportable conduct threshold under section 26(1) of the Child Safe Organisations Act 2024 (Queensland), the matter is reported directly to the Queensland Family and Child Commission under section 33(2)(b) of that Act and is governed by CP-007 Reportable Conduct Scheme Governance and Delegation Statement.

To safeguard confidentiality and maintain the integrity of the complaint process, access to the entire Complaint Register will be limited to the Principal and persons authorised by the Principal for governance, audit and child safety oversight purposes (including the Reportable Conduct Scheme Coordinator designated under CP-007 and members of the Finance, Audit and Risk Committee acting in their assurance role).

The Principal may authorise the sharing of specific, relevant entries from the Complaint Register with other designated staff members (such as the College 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.

Complaint Handling Procedure

St Patrick's College Townsville Complaint & Dispute Resolution Procedure.

Notes

1. Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland), section 7.
2. Standards Australia, Guidelines for complaint management in organisations (AS 10002:2022, NEQ), section 4.3.
3. Standards Australia, Guidelines for complaint management in organisations (AS 10002:2022, NEQ), section 4.2.
4. Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland), section 16(2)(a).
5. Education (Accreditation of Non-State Schools) Regulation 2017 (Queensland), section 16(5).

