



RCTC-P13_25 COMPLAINTS MANAGEMENT POLICY

1.0 OBJECTIVE

- 1.1 The *Complaints Management Policy* ('Policy') outlines the Catholic Diocese of Townsville's ('Diocese') approach to handling and managing complaints. This includes:
- An accessible, transparent, timely, consistent, and effective complaints handling process.
 - A just and compassionate response, respecting the dignity of all individuals involved.
 - Clear roles and responsibilities for the complaints management process.
 - Mechanisms for monitoring, analysing, and evaluating the complaints management process to support continuous improvement.

2.0 SCOPE

- 2.1 This Policy applies to complaints related to decisions made by the Diocese or its personnel,¹ including those in Agencies, Ministries and Parishes. Complaints are subject to provisions of the diocesan *Whistleblower Policy* and, where relevant, the diocesan *Safeguarding Children and Vulnerable Adults Policy*. This Policy operates within the framework of the Code of Canon Law, organisational standards, and statutory requirements. It does not apply to disputes or claims referred to external bodies or employment-related issues.

3.0 POLICY STATEMENT

- 3.1 The Diocese values complaints and is committed to responding to and resolving complaints. Complaints provide opportunity and valuable insights that can help improve services, relationships and ministry, and strengthen diocesan operations.
- 3.2 All complaints received will receive a just, reasonable and compassionate response that respects the dignity and authenticity of all involved.
- 3.3 Matters relating to allegations of abuse will be handled with trauma-informed care, prioritising pastoral care and understanding.
- 3.5 Church personnel at all levels are expected to ensure a fair, effective and efficient complaints handling response.
- 3.6 The Diocese manages the diverse nature of its ministry and business undertakings across the Agencies as autonomous divisions. Each Agency is required to establish, implement, and review appropriate complaints management governance such as policies, guidelines, committees, reporting and systems to manage complaints in accordance with their regulatory obligations. Formal reporting structures are outlined in Schedule 2: Complaints Management Roles and Responsibilities.
- 3.7 *Complaints Management Principles for the Diocese*
- 3.7.1 *People-focused*: Complainants will be treated with respect, and all reasonable steps should be taken to ensure that complainants are not adversely affected because of a complaint made by them or on their behalf.
- 3.7.2 *Accessibility*: Information on how and where to make a complaint, as well as who to direct it to, will be readily available with ease of understanding.

¹ Australian Catholic Safeguarding LTD: *National Response Protocol*

- 3.7.3 *Responsiveness*: All complaints should be promptly acknowledged and assessed, and the expectations of complainants will be actively managed. The safety of others who may be at risk of harm should always be the priority response.
- 3.7.4 *Objectivity and Fairness*: Complaints will be managed in an objective and unbiased manner and all parties will be afforded natural justice/procedural fairness as part of the process.
- 3.7.5 *Recording Complaints*: All complaints, including those submitted anonymously, will be recorded on a Diocese or Agency Complaints Register.
- 3.7.6 *Managing Complaints*: Complaints will be managed according to their nature and level of severity and risk, with an emphasis on safeguarding and protecting those involved.
- 3.7.7 *Privacy and Disclosure*: Information about complaints and subject matters involved in a complaint will only be disclosed or used in compliance with all relevant principles/laws and ethical and regulatory obligations. The safety of others who may be at risk of harm should always be the priority.
- 3.7.8 *Accountability*: Personnel responsible for managing complaints are expected to fulfil their responsibilities with diligence and adherence to these principles.
- 3.7.9 *Continuous Improvement and Cultural Change*: Learning from complaints should be part of a commitment to continuous quality improvement, process development and positive cultural change.
- 3.7.11 *Personnel Involvement*: Appropriate to the nature and circumstances of a complaint, Church personnel subject to a complaint may be directed to have limited to no contact with the complainant. This will occur with the appropriate pastoral support provided to respondents facing a complaint or allegation.
- 3.7.12 *Abusive, trivial or unreasonable complainants*: A Responsible Person may refuse to investigate a complaint if it is seen to be abusive, vexatious, trivial, unreasonable, misleading, patently untrue, or where the complainant refuses to cooperate with efforts to investigate.

4.0 APPLICABILITY

- 4.1 The Policy applies to all Church personnel of the Diocese and its Agencies.²
- 4.2 Some larger agencies (e.g. Catholic Education, Centacare NQ) will have their own policy and procedures that meets their particular regulatory requirements and are in accord with the terms and intent of this Policy, including the reporting requirements in Schedule 2.

5.0 RESPONSIBILITIES

Policy Owner	The Bishop is the Policy Owner for all diocesan policies.
Policy Manager	The Policy Manager for this policy is the Diocesan Director Safeguarding, Culture & Shared Services.
Communication	<ul style="list-style-type: none"> The Policy Manager is to advise all Agencies, Ministries and Parishes covered by this Policy and its enacted date. The Parish Priest or Parish Administrator is to advise the Parish staff and committees of this Policy and its compliance. The Senior Executives are to provide advice and communicate this Policy to all Agency/Division staff and volunteers.
Compliance	<ul style="list-style-type: none"> Each Senior Executive is responsible for implementing systems for their Agency/Division to effectively manage complaints. The Bishop must be informed of any complaint which may negatively impact the Diocese, its image or reputation. Non-compliance should be reported to the relevant Senior Executive (or their

² Australian Catholic Safeguarding LTD: *National Response Protocol*


	<p>delegate) and the Policy Manager who will report to the Bishop. In all instances of serious non-compliance matters the Bishop must be informed.</p> <ul style="list-style-type: none"> • If the matter relates to allegations of abuse, or misconduct in the management of an allegation of abuse, and directly implicates the Bishop, the Director, Professional Standards Office Queensland must be advised immediately.
Monitoring and Review	The Policy Manager has responsibility to review the Policy every three years (or sooner if required) to ensure it is compliant with relevant diocesan goals, legislation/regulation and diocesan requirements. The review will be undertaken in collaboration with Senior Executives.
Reporting	<ul style="list-style-type: none"> • The Policy Manager will report to the Bishop at the time of the policy review. • Reporting requirements for ongoing management of complaints across the Diocese are outlined in Schedule 2.
Accessibility	This Policy will be available to diocesan stakeholders and placed on the diocesan website.

6.0 RELATED POLICIES, PROCEDURES AND/OR LEGISLATION

- Catholic Diocese of Townsville Safeguarding Children and Vulnerable Adults Policy
- Catholic Diocese of Townsville Whistleblower Policy
- Catholic Diocese of Townsville Code of Conduct Policy

Version Date	Enacted Date	Comments
August 2022	August 2022	Original Policy and Guidelines
June 2025		Updated Policy. Guidelines rescinded.
Review Date:	June 2028	

Approved By:



Date: 12 June 2025

Most Rev Timothy Harris DD
Bishop of Townsville

DEFINITIONS

Church personnel: A cleric, member of a religious institute or other person (other than a cleric or a member of a religious institute) who is employed by the Roman Catholic Trust Corporation for the Diocese of Townsville or engaged on a contract, subcontract, voluntary or unpaid basis. (Australian Catholic Safeguarding LTD: *National Response Protocol*)

Code of Conduct: The Code, as outlined in the diocesan *Code of Conduct Policy*, is a key component of the organisational standards of the Diocese. It outlines the obligations, responsibilities, and standard of professional and personal behaviour the Diocese requires of all personnel, to uphold and achieve a safe, supportive, productive, and harmonious workplace and to uphold the values, integrity and reputation of the Diocese.

Complaint: A complaint is a statement made by an individual or group, about something they find to be unsatisfactory or unacceptable. Complaints generally relate to a service delivered, ministry relationships, personnel decisions, or behaviour, and policies, procedures, and practices.

Natural Justice: The Principles of Natural Justice are best summarised as follows:

- All parties should have the opportunity to be heard and all relevant information they present considered before a decision is made.
- All parties should have adequate opportunity to present their views and respond to any adverse/contrary material within a realistic timeframe.
- A person is considered innocent until evidence, material and/or interviews prove otherwise.

Procedural Fairness: The procedure used by a decision-maker, ensuring it is fair and proper.

Resolution: A complaint is resolved when the issue raised has been dealt with in line with the diocesan *Complaints Management Policy*. The resolution may or may not be to the complainant's satisfaction.

Responsible Person: One of the Church personnel who has responsibility both to resolve a particular Complaint Category and to ensure that the Complaint has been entered onto and maintained on the Diocesan and Agency Complaint Registers.

Safeguarding: Means providing Children and Vulnerable Adults with a dignity of life and respect and security from physical, emotional, spiritual, and psychological harm.

Subject Matter: Refers to the specific issue, action or situation that is the reason for the complaint. It is the core problem or concern being raised.

Trauma-informed care: A response that creates a respectful and supportive environment, to ensure safety, trustworthiness and empowerment for all involved.

Vexatious Complaint: A vexatious complaint can be, but is not limited to, a groundless complaint that causes distress, detriment or harassment to the subject of the complaint; or a complaint that is unduly repetitive, burdensome, or unwarranted when compared to its merits.

SCHEDULE 1: COMPLAINTS MANAGEMENT PROCESS

S.1.1 Overview

The Catholic Diocese of Townsville is committed to promoting a culture of fairness, accountability, and continuous improvement in handling complaints. This process aims to ensure all complaints are addressed consistently and transparently, in alignment with this policy, canon law, statutory obligations, and Safeguarding responsibilities.

The diocesan process for managing complaints encompasses a people-focused, accessible, and responsive approach. Complainants are to be treated with respect and fairness, and the process should be transparent and clearly communicated, with prompt acknowledgment, regular updates, and clear explanations of outcomes. Objectivity, natural justice, and privacy are essential, ensuring information is managed ethically and in compliance with relevant laws.

Table 1: Diocesan Complaints Management Pathways

Issue	Initial Contact	Other Options	Policy
Disclosable Matters or Suspected Misconduct	<ul style="list-style-type: none"> If enacting whistleblower protections: STOPline or Eligible Persons Other: Senior Executive 	<ul style="list-style-type: none"> Diocesan Whistleblower email address Whistleblower Governance Officer 	<ul style="list-style-type: none"> Diocesan Whistleblower, Complaints Management, Safeguarding Children and Vulnerable Adults and/or Code of Conduct Policies Agency Policies/Codes of Conduct
Safeguarding Children & Adults	<ul style="list-style-type: none"> Queensland Police Service or applicable regulator 	<ul style="list-style-type: none"> STOPline Diocesan Director, Safeguarding Culture and Shared Services Professional Standards Office Queensland (if relating to the Bishop) 	<ul style="list-style-type: none"> Diocesan Safeguarding Children and Vulnerable Adults, Whistleblower and/or Code of Conduct Policies Agency Policies/Codes of Conduct
Workplace conflicts or grievances	<ul style="list-style-type: none"> Supervisor or Manager 	<ul style="list-style-type: none"> Agency Senior Executive 	<ul style="list-style-type: none"> Diocesan Workplace Discrimination, Harassment and Bullying, Complaints Management and/or Code of Conduct Policies Agency Policies/Codes of Conduct
Workplace Health & Safety	<ul style="list-style-type: none"> Supervisor, Manager or School Principal 	<ul style="list-style-type: none"> Diocesan People & Safety Team STOPline 	<ul style="list-style-type: none"> Diocesan Work Health & Safety Policy Agency Policies/Codes of Conduct Commonwealth/State Legislation
Complaints	<ul style="list-style-type: none"> Diocesan Office, diocesan complaints email, Church personnel, Parish Priest, School Principal or Agency office 	<ul style="list-style-type: none"> Parish Priest Diocesan Complaints Officer Agency Senior Executive 	<ul style="list-style-type: none"> Diocesan Complaints Management Policy Agency Policies/Codes of Conduct Commonwealth/State Legislation

S.1.2 Receiving Complaints

- Complaints may be made in writing or verbally (including, but not limited to, letter, SMS, email, website feedback, any form of social media submission, in-person or phone) and may be made anonymously.
- Complaints received in writing must be retained in electronic format and filed in a manner that is easily retrievable.
- Complaints received will be acknowledged within five (5) business days by the Diocesan Complaints Officer. A copy of the acknowledgement will be saved with the complaint.

S.1.3 Recording Complaints

S.1.3.1 Diocesan Complaints Form

- All complaints will be recorded on a diocesan Complaint Form either:
 - Directly via the diocesan website, or
 - By the Church personnel receiving the complaint and having initial contact with the complainant, if in person.

- All complaints will then automatically be recorded on the Diocesan Complaints Register, identifying the date received.

S.1.3.2 Anonymous Reports

Individuals are permitted to lodge their complaint anonymously; however, it may limit the capacity to reasonably investigate the complaint. Anonymous complaints must still be investigated and recorded to a reasonable extent.

S1.4 Assessing Complaints

S.1.4.1 Diocesan Complaints Officer (DCO)

Upon receipt, the DCO will assess the complaint. The DCO is the Director, Safeguarding, Culture and Shared Service or their delegate. In their absence, another member of the diocesan Executive Team will assume the responsibilities of the DCO.

S.1.4.2 Assessment and allocation

- The DCO will categorise the complaint by severity and risk, with priority given to safeguarding and protecting those involved.
- Complaints will be categorised into one of the below complaint categories and allocated to a Responsible Person by the DCO.

Complaint Category	Responsible Person
<ul style="list-style-type: none"> • <i>Matters relating to Agency personnel and operations</i> 	Agency Senior Executive
<ul style="list-style-type: none"> • <i>Matters relating to a diocesan Senior Executive</i> 	Managed by an alternative Senior Executive/external assessor as required by the Conflict of Interest provisions in the diocesan <i>Code of Conduct Policy</i> .
<ul style="list-style-type: none"> • <i>Harm, Abuse, or Breach of Safeguarding Procedures</i> <ul style="list-style-type: none"> ○ Life threatening or alleged abuse just occurred ○ Suspicion of Harm ○ Historic abuse ○ Breach in Safeguarding Procedures 	Agency Senior Executive or Diocesan Director Safeguarding, Culture & Shared Services
<ul style="list-style-type: none"> • <i>Issues relating to People and Safety Matters</i> <ul style="list-style-type: none"> ○ Dissatisfaction with a HR decision, Code of Conduct issues (e.g. Conflict of Interest, Church personnel behaviour) or HR Policy breaches. 	Agency Senior Executive or Diocesan People & Safety Team
<ul style="list-style-type: none"> • <i>Other</i> <ul style="list-style-type: none"> ○ Dissatisfaction with a non-HR decision, policy breach or other complaint. 	Appropriate Responsible Person to be determined by the DCO.

- Complaints about Senior Executives and/or leadership staff will be referred to the Diocesan Complaints Officer and will be managed in accordance with the Conflict of Interest provisions in the diocesan *Code of Conduct Policy*. Where the complaint relates to the Diocesan Complaints Officer, an alternative Senior Executive will be nominated to assess the complaint.

S.1.5 Responsible Persons

Every complaint that is managed by this process will have a person responsible for it being addressed and resolved.

S.1.5.1 Key responsibilities of the Responsible Person

- Address and resolve the complaint.
- Maintain entries in Diocesan Complaints Register.
- Delegate tasks to appropriate personnel but retains overall responsibility as required.
- If unresolved, forward to the DCO for determination.

S.1.6 Resolving Complaints

S.1.6.1 Steps for resolution

- a) Conduct and initial assessment to determine the nature, risk and severity of complaint.
 - b) Gather relevant information through interviews, documentation, or other investigative methods.
 - c) Make informed decisions based on evidence, policies, and guidelines to resolve the complaint.
 - d) Ensure all documentation about the complaint, investigation and resolution are appropriately secured and remain confidential.
- Church personnel involved in complaints may face restrictions in contact with complainants, with appropriate pastoral support provided.
 - A decision not to investigate a complaint will be made with the Responsible Person and the DCO. The Complaint and the decision to not investigate, must be recorded on the Diocesan Complaints Register for transparency and accountability.
 - The DCO will regularly review the Diocesan Complaints Register and liaise with Responsible Persons, to ensure complaints are being managed in accordance with this Policy.

S.1.6.2 Timeframes for responding and resolving

- The Responsible Person will establish specific timeframes for each stage of the complaint resolution process to ensure timely responses, depending on the complexity of the issue (e.g., 30 business days).
- Delays must be communicated promptly, providing reasons and updated expectations for resolution.

S.1.6.3 Communication methods for outcomes

- The resolution outcome will be shared with all relevant parties in a clear, respectful, and professional manner.
- Appropriate communication channels will be used, such as formal letters, emails, or face-to-face meetings, based on the sensitivity of the issue.

S.1.7 Escalation and Appeals

S.1.7.1 Complaint escalation

- The DCO will determine if a complaint should be escalated when the needs of the complainant cannot be resolved by the person handling the complaint.
- A complaint involving threats, aggression or behaviour that causes a safety concern may be escalated, and where necessary referred to legal representatives or regulatory agencies

S.1.7.2 Options for appeal or review

- If the complainant is dissatisfied with the resolution, the Diocesan Complaints Officer assess options for appeal or review.

S.1.8 Safeguarding and Whistleblower Reporting

- In cases where the complaint involves serious misconduct, illegal activities, or breaches of ethical or regulatory conduct, individuals can refer to the diocesan *Whistleblower Policy*.

S.1.9 Reporting

- The Director, Safeguarding, Culture and Shared Service will prepare an Annual Complaints Management Summary Report for the Diocesan Office and Parishes, for review by the DFC and the Bishop. This Report will summarise the status of the Diocesan Complaints Register.
- The Bishop must be informed of any complaint which may negatively impact the image or reputation of the Diocese as soon as practically possible.

S.1.10 Abusive, trivial or vexatious complaints

A Responsible Person may refuse to investigate a complaint if it is seen to be abusive, trivial, unreasonable, misleading, patently untrue, or where the complainant refuses to cooperate with efforts to investigate. The decision not to investigate will be made in consultation with the DCO and the decision recorded on the Diocesan Complaints Register.

S.1.11 Important things to consider when receiving and managing a disclosure of harm³

All Church personnel have a responsibility to be informed on what to do when managing a disclosure of harm. Key steps to note and apply are:

Receive:

- Remain calm and be welcoming to the person.

Respect:

- Listen attentively, supportively and non-judgmentally;
- Ensure a private conversation occurs, respecting confidentiality, whilst remaining in an open space if possible.

Record:

- Encourage the person to talk in their own words and ensure just enough open-ended questions are asked to act protectively (e.g. 'Can you tell me what happened'... or 'Can you tell me more about that'). Don't ask leading questions which tend to suggest an answer.
- Document the disclosure as clearly as possible – it may be more appropriate to wait until after the person has disclosed before documenting or they may give you permission to take notes. You should try and accurately record:
 - The relevant dates, times, locations of alleged offences and who was present;
 - Exactly what the person disclosing said, using 'I said,' 'they said' statements;
 - The questions you asked;
 - Any comments you made;
 - Your actions following the disclosure.
- Do not attempt to investigate or mediate an outcome. The Queensland Police Service may want to know the following:
 - Name, age and address of the vulnerable person making the disclosure;
 - Whereabouts of the vulnerable person at that point in time;
 - Any identifying information of the alleged perpetrator;
 - Details of person reporting the harm.

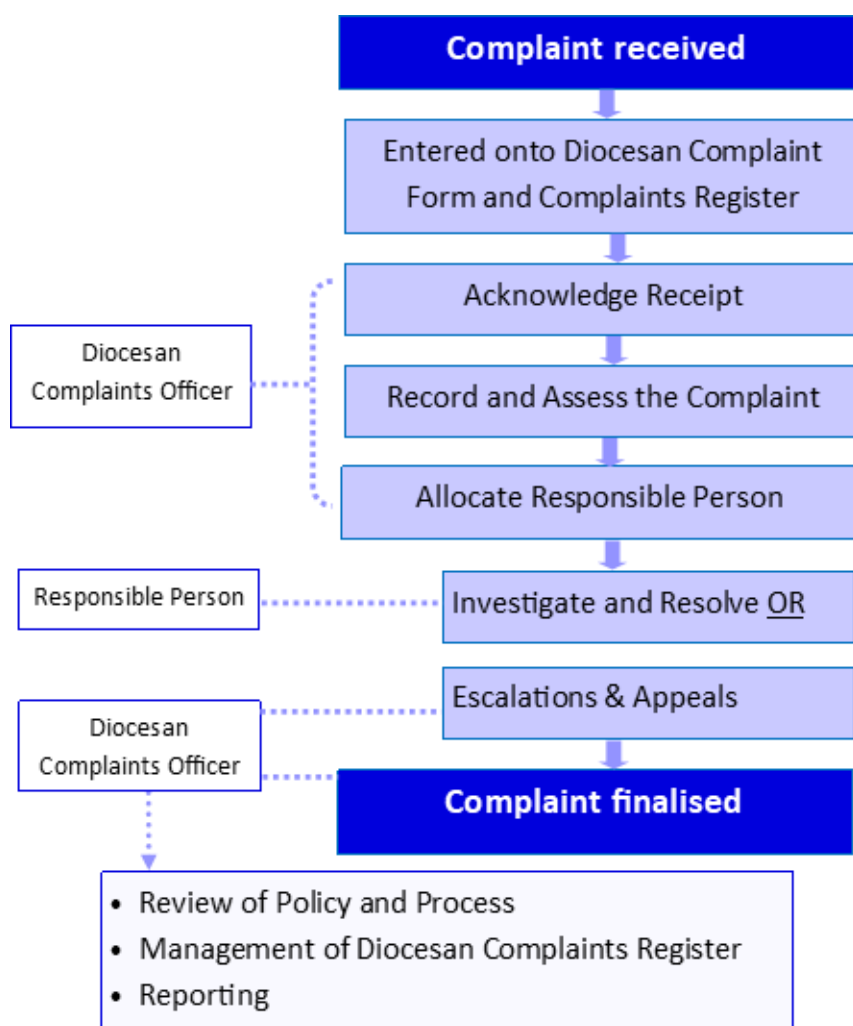
Reassure:

- If the person is a child, ensure you advise and reassure them that the disclosure cannot remain a secret and it is necessary to advise a suitable person in order to get help for them;
- Reassure the person they have done the right thing by telling you;
- If the person is over 18 years, explain that you would like to tell someone else who can help and seek their consent to report the concerns and to provide them support.

Refer:

- **If the child or vulnerable adult is in a life-threatening situation, you should immediately notify Queensland Police Service on 000.**
- If the person is over 18 and is not at risk of immediate harm, but does not seek assistance, provide the person with the details for the Queensland Professional Standards Office: 1800 337 928 – 9am-5pm Mon-Fri. If you have concerns about their mental health or decision-making capacity contact the Diocesan Director Safeguarding, Culture & Shared Service;
- For a child under 18 years, mandatory reporting requirements apply. Contact the Queensland Police Service or Child Safety Services;
- In all cases, advise the Diocesan Director Safeguarding, Culture & Shared Service who can assist in making the report to authorities, or follow the Agency's reporting procedures where relevant.

³ Catholic Diocese of Townsville: *Safeguarding Children and Vulnerable Adults Policy and Procedures*



SCHEDULE 2: COMPLAINTS MANAGEMENT ROLES AND RESPONSIBILITIES

Role	Diocesan Complaints Management Policy Responsibilities	Frequency
Bishop	<ul style="list-style-type: none"> Approve Complaints Management Policy 	Every three Years
DFC & DCLG	<ul style="list-style-type: none"> Review Complaints Management Policy 	Every three Years
Agency Council	<ul style="list-style-type: none"> Review and endorse Agency complaints management policies/guidelines. 	Every three years
Agency Senior Executives	<ul style="list-style-type: none"> Responsible for implementing systems for their Agency/Division to effectively manage complaints. Provide advice and communicate this Policy to all Agency staff and volunteers. Receive reports of non-compliance and report all instances of serious non-compliance to the Bishop. Advise the Bishop of any complaints that negatively impact the Diocese, its image or reputation. Coordinate complaints management training for relevant persons within the Agency. 	Ongoing
Priests and Parish Administrators	<ul style="list-style-type: none"> Advise the Parish staff and committees of this Policy and its compliance. 	As required
Diocesan Director, Safeguarding, Culture & Shared Services	<ul style="list-style-type: none"> Policy Manager for the Complaints Management Policy. Advise all Agencies, Divisions and Parishes covered by this policy and its enacted date. Review the Complaints Management Policy every three years or sooner, in consultation with Agency Senior Executives. 	Every three Years
	<ul style="list-style-type: none"> Perform the duties of the Diocesan Complaints Officer, including: <ul style="list-style-type: none"> Maintaining the Diocesan Complaints Register. Assessing complaints as received. Allocating complaints to Responsible Persons. Reviewing the Diocesan Complaints Register and liaising with Responsible Persons, to ensure complaints are being appropriately managed. Reviewing/supporting decisions on complaints which are not to be investigated. Determining options for complaint escalation, appeal or review. Facilitate complaints management training for personnel where required. 	Ongoing
Responsible Person(s) (As assigned by the DCO)	<ul style="list-style-type: none"> Establish timeframes for complaint resolution to ensure timely responses. Address and resolve the complaint. Maintain entries in Diocesan Complaints Register and ensure complaint documentation is appropriately secured and confidential. Recommend to the DCO complaints which are not to be investigated. Forward unresolved complaints to the DCO for determination/escalation. 	As required
Director, Professional Standards Office Qld	<ul style="list-style-type: none"> Responsible for addressing complaints with regard to the Bishop, relating to allegations of abuse or the management of allegations of abuse. 	As required
External Review (external provider)	<ul style="list-style-type: none"> Third party review of Complaints Management Policy. Complaints Management Health Check, to determine the adequacy of nominated controls, and identification of complaints management issues. 	As required