



Complaints Handling Policy

1. Introduction

The Queensland Independent Schools Block Grant Authority (QIS BGA) Board recognises the importance of prudent complaints handling as part of quality business practice. The potential risks associated with mismanagement of complaints, or not dealing with complaints at all, are acknowledged.

Complaints will be treated as a valuable source of feedback and are considered by the Board to be an important tool for business improvement and employee development. Due to the nature of the work carried out by QIS BGA, complaints may arise in areas such as privacy, whistleblowing, safety in the workplace and general dissatisfaction with service provision or employee actions.

2. Purpose

The purpose of this policy is to:

- (a) ensure employees are familiar with the Complaints Handling Framework
- (b) inform clients and stakeholders of the availability of the Complaints Management System
- (c) provide an avenue for client and stakeholder communication and feedback which is grounded in an efficient, fair and accessible framework
- (d) recognise, promote and protect the client/stakeholders rights
- (e) embed the Boards' commitment to continuous improvement.

3. Definitions

- (a) A **complaint** is an expression of dissatisfaction made to or about an organisation, related to its products, services, employee/s or the handling of a complaint, where a response or resolution is explicitly or implicitly expected.
- (b) **Complaints Handling Framework** is the corporate policy and related resources underpinning the complaints handling process to be implemented by the Board, General Manager and employees.
- (c) **Complaints Management System** is the procedure, personnel and technology used by QIS BGA in receiving, recording, responding to and reporting about complaints.
- (d) **Formal complaint** is one that is not able to be resolved at the first point of contact and where the client conveys that they are seeking further action to be taken. The complaint is submitted in writing to the General Manager or Board Chair either directly from the client or documented by another on behalf of the client.
- (e) **Informal complaint** is a complaint of a less serious nature, which can be acknowledged verbally and resolved without the need for a formal investigation.





4. Relevant Documentation and Legislation

- (a) *QIS BGA Staff Handbook*
- (b) *QIS BGA Prevention of Bullying, Discrimination and Sexual Harassment Policy*, June 2022
- (c) *QIS BGA APP Privacy Policy*, October 2022
- (d) *QIS BGA Internal Privacy Policy*, October 2022
- (e) *QIS BGA Data Breach Response Plan*, October 2022
- (f) *QIS BGA Whistleblower Protection Policy*, October 2020
- (g) *QIS BGA Workplace Consultation, Co-operation and Issue Resolution Policy*. February 2022
- (h) *QIS BGA Complaints Register*
- (i) *QIS BGA Complaint Form*

5. Scope

- (a) This policy overviews the *Complaints Handling Framework* and the established system of complaint management which supports clients and stakeholders, including government agencies, duly authorised representatives of schools or members of the public, to complain in relation to actions and decisions which may have adversely affected them.
- (b) The *Complaints Management System* will support the handling of lower-risk and higher-risk complaints such as, but not limited to:
 - (i) Lower-risk complaints, for example:
 - a disagreement with QIS BGA operational procedures*
 - perceived unfair treatment in the workplace
 - minor workplace safety concerns.
 - (ii) Higher-risk complaints:
 - workplace health and safety issues
 - significant threats to an individual's privacy
 - fraudulent corrupt practices such as bribery, illegal conduct, or improper conduct such as concealment of corruption.

*NOTE- Any complaints relating to the allocation of capital grants to schools will be addressed under the relevant QIS BGA policy for the review of grant based decision-making, which encompasses capital grant program guidelines. Where review requests are in relation to the grant based decisions made by the QIS BGA Capital Advisory Committees or Board of Directors, the relevant program guidelines will apply.

6. Procedure

6.1 KEY PRINCIPLES OF COMPLAINTS HANDLING

(a) The Principle of Natural Justice

- (i) Application of the principle of natural justice will ensure a genuine complaint will be handled in an equitable, objective and unbiased manner.
- (ii) QIS BGA promotes procedural fairness and consistency when managing client and stakeholder complaints.
- (iii) QIS BGA will be receptive to client and stakeholder complaints and encourage feedback, both positive and negative. QIS BGA also supports a 'complaint friendly' culture that respects the right to complain about any aspect of QIS BGAs operations.

(b) Continuous Improvement

- (i) The *Complaints Register* (refer Attachment 2) will be used to track and monitor the progress of complaint management against agreed timeframes, identify systemic and recurring problems, guide complaint reduction strategies and improve service delivery.
- (ii) Where potential system improvements are identified, such feedback shall be communicated by the General Manager to the Board for consideration and implementation.


6.2 THE COMPLAINTS HANDLING FRAMEWORK

(a) Training and Resources

- (i) Adequate physical and human resources, including technology and employees, will be available to assist complainants and to manage complaints.
- (ii) All employees will be trained in the *Complaints Management System* which will include:
 - identification of a complaint
 - how to handle a complaint on the frontline
 - when it is appropriate to informally manage a complaint
 - when a formal complaint should be escalated to the General Manager, as the *Complaints Officer*, or the Board Chair, as required.
- (iii) It is intended that QIS BGA employees are empowered through training to resolve less serious complaints at the outset.

(b) Complaints Resolution Protocols

- (i) Non-serious verbal complaints should be resolved at the frontline.
- (ii) Written complaints, serious or unresolved verbal complaints and complaints referred by external agencies must be progressed to the General Manager for resolution (refer Attachment 1). If the General Manager cannot resolve a complaint or the complaint refers to the General Manager, the Board Chair will assume the responsibilities of presiding and officiating over the process to resolve the complaint (refer Attachment 1).
- (iii) The General Manager will review complaints and deem the nature of the complaint. The General Manager may investigate and review written responses for consistency



and completeness and ensure the quality of the data recorded. Every reasonable effort will be made to investigate all the relevant circumstances and information surrounding a complaint.

- (iv) The General Manager may determine that the complaint is serious enough to be addressed in counsel with the Board Chair. In this situation, or if a complaint is in relation to the General Manager, the Chair will determine whether to refer the complaint to the Board.
- (v) Complainants will not suffer any reprisal from QIS BGA or its employees for making a complaint.

(c) **Reporting Requirements**

- (i) All complaints made will be entered to the *Complaints Register*.
- (ii) The General Manager will report, at least, quarterly to the Board regarding complaints received and the subsequent resolutions and corrective actions. Any incidents within the quarter which pose a serious risk to the business are to be reported to the Board, at least, by the next meeting.

6.2 THE COMPLAINTS MANAGEMENT SYSTEM

(a) **Transparency and Access**

- (i) Information regarding access to and the flow of the complaints handling processes will be available on the QIS BGA website at www.bga.qld.edu.au.
- (ii) Written complaints will be provided to the General Manager through the e-mail address- bgaoffice@bga.qld.edu.au.
- (iii) Reasonable assistance will be available to complainants, including where complainants are unable to lodge a complaint in writing or people requiring interpreter service assistance.

(b) **Tracking**

- (i) All complaints will be tracked via the *Complaints Register* (refer Attachment 2) whether they are informal or formal.
- (ii) The register will record the nature and frequency of complaints, thereby providing information required for the identification of risks. Information such as,
 - complaint details
 - supporting documents
 - records of any investigation (such as witness statements)
 - outcomes/corrective actions
 - completion of reporting requirementswill form the entries to the register.
- (iii) For high risk complaints the register will also be a record of the progress of complaint resolution, within the documented timeframe.



(c) **Responsiveness**

- (i) Receipt of a complaint will be acknowledged to the complainant as soon as possible. Low-risk complaints may be acknowledged verbally and resolved without the need for a formal investigation or written response. High-risk complaints require formal written acknowledgement, followed by documentation of investigation and responses provided.
- (ii) Complaints will be dealt with in reasonable timeframes, which will, at the outset, be documented and known by those parties involved.
- (iii) All parties to a complaint will receive regular progress reports/updates throughout the process.
- (iv) When a complaint is justified, QIS BGA will take appropriate remedies that are timely, fair and reasonable to the parties involved. QIS BGA will always endeavour to resolve complaints quickly and without embarrassment and conflict.

(d) **Objectivity**

- (i) Complaints will be investigated without prejudice to any other right a complainant might have.
- (ii) Each complaint will be addressed in an equitable, objective and unbiased manner.
- (iii) Complaints will be managed in a fair and consistent way.

(e) **Confidentiality**

- (i) Complaints will be dealt with confidentially within the bounds of the required investigation, and complainants respectfully treated, in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988*, which underpins QIS BGAs *APP Privacy Policy*.
- (ii) Personal information collected as part of the complaints process will be managed in accordance with the *QIS BGA APP Privacy Policy*.

(f) **Feedback**

- (i) Complainants will be advised of outcomes as soon as possible after a decision is made. They will be given reasonable feedback including reasons for the complaint outcome.
- (ii) The complainant will be informed of any further review mechanism that is available should he/she be dissatisfied with action taken by QIS BGA in relation to their complaint (refer Attachment 1).

7. Responsibilities

- (a) The QIS BGA Board carries responsibility for monitoring and reviewing the policy.
- (b) The General Manager will:
 - (i) ensure that the *Complaints Handling Policy* is implemented.
 - (ii) ensure employees understand the nature of informal and formal complaints, their associated levels of risk and how to effectively manage any referrals and responses.
 - (iii) review and investigate all unresolved complaints.

- (iv) manage the documentation of all complaints received, through the *Complaints Register*, and how they were resolved, including any changes that may be required to delivery of service.
- (c) All employees:
 - (i) are responsible for receiving client and stakeholder complaints and feedback.
 - (ii) are to give priority to assist in the resolution of client and stakeholder complaints. They will resolve minor verbal (informal) complaints where appropriate or refer more serious written (formal) complaints directly to the General Manager. Where the position of General Manager is the basis of the complaint, the Board Chair will receive the complaint.

QIS BGA DOCUMENT CONTROL DETAILS		
VERSION: v4.0		Reference: OP/Pol/17
Last Revision Date: October 2022	Next Revision Date: October 2025	Review Frequency: 3 Years

Attachment 1

INFORMAL AND FORMAL INTERNAL CLIENT COMPLAINT MANAGEMENT



Informal complaint received verbally, such as via telephone



Complaint resolved on receipt at front line by employees or General Manager
Enter into Complaint Register

Informal complaint unable to be resolved **at front line**
OR
formal **written complaint** received



WHERE COMPLAINT IS IN RELATION TO POSITION OF GENERAL MANAGER

UNRESOLVED COMPLAINT REFERRED TO GENERAL MANAGER FOR INVESTIGATION

UNRESOLVED

UNRESOLVED COMPLAINT REFERRED TO BOARD OF DIRECTORS FOR INVESTIGATION

RESOLVED



Responsible person records complaint in the Complaint Register

FEEDBACK WILL BE PROVIDED TO ALL PARTIES

COMPLAINT REFERRED TO BOARD CHAIR

