BORDER RIVERS CHRISTIAN COLLEGE
Cnr Gibson Street and Lilly Drive
Goondiwindi Qld 4390

Complaints Handling Policy 4.1

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:	Draft	**Supersedes:** Complaints Policy & Procedures 3.0
Authorised by:	Board Chair	**Date of Authorisation: October 2026**
References:	• *Child Safe Organisations Act 2024* (Qld) • *Education (Accreditation of Non-State Colleges) Regulation 2017* (Qld) • *Education Services for Overseas Students Act 2000* and National Code • Standards Australia, AS 10002:2022 Guidelines for complaint management in organizations (ISO 10002:2018 NEQ) • BRCC Reporting Concerns of Harm and Abuse Policy • BRCC Student Safety and Wellbeing Policy • BRCC Behaviour Management Policy • BRCC Staff Code of Conduct • BRCC Student Code of Conduct • BRCC Sexual Harassment Policyh • BRCC Privacy Policy • BRCC Constitution • BRCC Board Charter • BRCC Anti-bullying Policy • BRCC Work Health and Safety Policy • BRCC Anti-Discrimination Policy • BRCC Disability Discrimination Policy	
Review Cycle:	Annually	**Next Review Date:** October 2027
Policy Owner:	College Governing Body	

Version History

3.0	January 2026	Amended & Approved
4.0	June 2026	Amended & Approved
4.1	October 2026	Amended and Approved

[1] *Education (Accreditation of Non-State Colleges) 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 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.[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 the principal. If the complaint is against the principal, the Chairman of the Board will assess the complaint.
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 *Child Safe Organisations Act* 2024. A worker is a person who performs work of any kind for the college, 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

Border Rivers 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. Border Rivers Christian College is committed to ensuring that complaints received are handled in a responsive, efficient, consistent, effective, transparent and fair way.

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

Border Rivers 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.

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

Border Rivers 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*.

Statement of Commitment to Student Safety & Wellbeing

Border Rivers Christian College is committed to providing a safe, supportive, and nurturing environment where all students can learn, grow, and flourish.

We affirm that the safety, wellbeing, and best interests of every student are our highest priority. We have zero tolerance for child abuse, harm, or neglect in any form.
Our College is committed to:

- Actively promoting the safety and wellbeing of all students, including those who are vulnerable
- Creating a culture where students feel safe, respected, and heard
- Ensuring all staff understand and fulfil their legal and moral obligations to protect children
- Implementing effective policies and procedures to prevent, identify, and respond to concerns about student safety
- Taking all concerns and disclosures seriously and responding promptly and appropriately
- Supporting students to develop confidence, resilience, and the ability to speak up about concerns
- Engaging with families and the broader community to promote student safety

We are committed to continuous improvement in our practices and to maintaining a child-safe culture grounded in our Christian values of care, respect, integrity, and compassion.

Statement of Commitment to Cultural Safety

Border Rivers Christian College is committed to fostering a culturally safe and inclusive environment where all students are respected, valued, and supported.
We recognise and honour the rich cultural diversity of our community, including Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land.
Our College is committed to:

- Providing an environment where students from all cultural backgrounds feel safe, respected, and able to fully participate
- Actively supporting the cultural safety of Aboriginal and Torres Strait Islander students
- Promoting understanding, respect, and appreciation of cultural diversity

- Ensuring that no student is disadvantaged, marginalised, or discriminated against because of their cultural identity
- Embedding inclusive practices across teaching, learning, and school life
- Engaging respectfully with families, communities, and cultural groups
- Continuously reflecting on and improving our cultural competence as a school community

We strive to build a community where diversity is celebrated, relationships are respectful, and every student feels a strong sense of belonging.

Complaints Handling Principles

Border Rivers 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 that 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

Border Rivers 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 Border Rivers Christian College Staff Code of Conduct, the Border Rivers Christian College Student Code of Conduct, 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
- issues relating to non-compliance with a process outlined in college policies or procedures, for example the Reporting Concerns of Harm and Abuse Policy, discrimination policies, or privacy policy. [5]

[4] Education (Accreditation of Non-State Colleges) Regulation 2017 s.16(2)(a)
[5] Education (Accreditation of Non-State Colleges) Regulation 2017 s.16(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 Border Rivers Christian College's Anti-Bullying policy & Border Rivers Christian College's Behaviour Management Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the college's Behaviour Management 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 the principal and dealt with under the enterprise agreement and/or employment law. This does not include disputes about work health and safety matters or complaints about relevant unlawful conduct under the college's Sexual Harassment Policy, which may be dealt with under the college's Complaints Handling Policy.
- Disputes between board members, between company members and board members or between company members should be dealt with in accordance with the Border Rivers Christian College Constitution. 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
- upon receipt of a complaint, manage the complaint in accordance with the Complaints Handling Policy
- treat all complaints seriously, fairly and in a transparent manner
- 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
- treat all complaints seriously, fairly and in a transparent manner
- 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 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

Border Rivers 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.

Each classroom displays an age-appropriate poster explaining how students can make a complaint or raise a concern. Information is also shared periodically in the College Newsletter, and this policy is available on the front page of the Border Rivers Christian College website.

Border Rivers Christian College also provides staff training on this policy. New staff receive training during induction and are given the Staff Code of Conduct and Staff Handbook, both of which include a summary of this policy. All existing staff members have been provided with a copy of this policy and asked to sign an acknowledgement, stating they have read, understood and will abide by the policy.

Complaint Register

Border Rivers 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 and the Compliance Officer.

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 Colleges) Act 2017* (Qld)
- *Education (Accreditation of Non-State Colleges) Regulation 2017* (Qld)
- *Education (General Provisions) Act 2006* (Qld)
- *Privacy Act 1988* (Cth)

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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, including allegations of reportable conduct must be lodged with the Board.
Julie Hoffmann
Business Manager
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c) 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.

d) Complaints can be lodged through various methods, including :
   i. Phone
   ii. Email
   iii. Online – Through Compass the school management system
   iv. In-person (by appointment)

e) If the complainant is unsure where to direct their complaint, they can contact the College's administration office for guidance.

   i. 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 either

      a. Completing the online complaint form (available on Compass)
      b. Requesting an appointment with the Principal

f) Where an anonymous complaint is lodged, the school will follow the complaints policy, when there is sufficient information to do so.

2. Acknowledgement, Assessment and Referral

a) The staff member receiving the complaint will:

   i. acknowledge the complaint within two (2) business days, outlining the next steps and where possible the estimated timeframes.

ii. 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.

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.

c) 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 school 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

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)

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

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 determine as appropriate in the circumstances.

6. Procedural Fairness

Border Rivers Christian College is committed to ensuring that formal complaints are managed in a fair, impartial, transparent and reasonable manner.

When managing a formal complaint, the College will, where appropriate to the circumstances:

i. **Act impartially:** Ensure the person investigating or determining the complaint is impartial and has no actual or reasonably perceived conflict of interest. Where necessary, an alternative person will be appointed to manage the complaint.

ii. **Provide an opportunity to respond:** Inform the respondent of the substance of the allegations or concerns that may affect them and provide a reasonable opportunity to respond before an adverse finding is made. Information will be provided in a manner that protects privacy, confidentiality and the safety of those involved.
iii. **Conflict of Interest:** ensure that any actual, perceived or potential conflict of interest is identified and managed appropriately.
iv. **Consider relevant information:** Give appropriate consideration to relevant information provided by the complainant, respondent and other relevant sources. Decisions will be based on the available evidence and the circumstances of the complaint.
v. **Make reasonable enquiries:** Undertake enquiries proportionate to the seriousness and complexity of the complaint, which may include reviewing documents, interviewing relevant people and seeking clarification of disputed information.
vi. **Make a fair and reasoned decision:** Ensure the decision-maker considers the relevant evidence objectively and records the findings, reasons for the decision and any actions to be taken.
vii. **Communicate the outcome:** Provide the complainant and, where appropriate, the respondent with written notification of the outcome and relevant reasons, subject to privacy, confidentiality and legal obligations.
viii. **Provide an avenue for review:** Inform the complainant of the applicable appeal process and how an appeal may be lodged.
ix. **Maintain appropriate records:** Keep records of the steps taken to ensure procedural fairness, including opportunities provided to respond, information considered, decisions made and reasons for the outcome.

Procedural fairness will be applied proportionately, having regard to the nature and seriousness of the complaint, the potential consequences for the parties, and the needs and circumstances of any student involved.
Nothing in this provision prevents the College from taking immediate protective or risk-management action where necessary to safeguard a student or another person. Child protection concerns, allegations of reportable conduct and other matters subject to mandatory reporting or specialist procedures will be managed in accordance with applicable legislation and the College's relevant policies.

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).