



Complaints Policy - Workplace

Author	ADS in consultation with Diocesan schools	
Risk Category	People safety and culture	
Relevant Legislation / Related information	Registered and Accredited Individual Non-government Schools (NSW) Manual - September 2023 – B8.2 Fair Work Act 2009 (Cth) Privacy Act 1988 (Cth) Disability Discrimination Act 1992 (Cth) Anti-Discrimination Act 1977 (NSW) Equal opportunities Act 1987(Cth) Crimes Act 1900 (NSW) Work health and safety Act 2011 (Cth & NSW) Work health and safety regulation 2017 (NSW) Fair Work Act 2009 (Cth) Australian Human Rights Commission - Good practice guidelines for internal complaint processes – November 2014 NSW Ombudsman - Effective Complaint Handling Guidelines, 3rd Edition - February 2017	
Related documents (Including but not limited to)	Code of Conduct - Personnel Child protection policies Bullying and Harassment (including sexual harassment) Policy and Procedure Investigations Policy and Procedure Whistleblower Policy and Procedure Privacy Policy Work Health and Safety Policy Employee Assistance Program Unreasonable Complainant Conduct Policy and Procedure	
Document location	SCAC\EXECUTIVE\Policies and procedures\21 Complaints – workplace SCAC\POLICIES & PROCEDURES\STAFF\21 Complaints - workplace	
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Feedback	Feedback on this policy can be emailed to the Principal	
Accessible	Board ☐ Staff ☒ Website ☐ Parent ☐	
Date Modified	Modified By	Modifications Made
10/06/2026	V Martin	• Addition of definitions • Addition of line manager information to the procedure to guide managers • Rewording of content for clarity

Purpose

This document outlines Sapphire Coast Anglican College's (SCAC) (the College) policy regarding the resolution of workplace complaints. It may be read in conjunction with the child protection policies of the College. SCAC's Reportable Conduct Policy states complainants are not required to assess whether their concern meets the threshold of reportable conduct before making a complaint. This policy and procedure must be read in conjunction with the *Investigations Policy and Procedure*.

Scope

This is an organisation-wide policy and applies to all personnel, including staff, volunteers and contractors. If this policy conflicts with another SCAC policy, a law, or a mandatory reporting requirement, the requirement with the highest authority will apply.

This policy does **not** apply to personal grievances between parents, guardians or other members of the school community. See: *Complaints Policy and Procedure – Community*. This policy also does **not** apply to complaints that constitute whistleblowing disclosures. See: *Whistleblower Policy and Procedure*.

Definitions

Bullying – see the *Bullying Harassment and Discrimination Policy*

Discrimination – see the *Bullying Harassment and Discrimination Policy*

Harassment - see the *Bullying Harassment and Discrimination Policy*

Personnel - all staff, volunteers and contractors

Victimisation – being treated badly, threatened, or disadvantaged because you made (or intend to make) a complaint about discrimination, harassment, or other unlawful or unreasonable behaviour. It is a separate unlawful act under Disability Discrimination Act 1992 (Cth) and in some cases it is a criminal offence.

Reasonable management action - Lawful and reasonable actions taken by management to direct, control or manage work - including performance management, operational decisions, and work allocation

Policy

Sapphire Coast Anglican College (SCAC) (the College) is an equal opportunity employer that promotes fair, equitable and respectful behaviour in the workplace. We aim to:

- create a working environment where all workers are treated with dignity, courtesy and respect
- implement training and awareness raising strategies to ensure that our people know their rights and responsibilities
- provide an effective procedure for complaints based on the principles of procedural fairness
- treat all complaints in a sensitive and timely and confidential manner i.e. on a need-to-know basis, in accordance with SCAC's legal obligations
- take all reasonable steps to prevent victimisation or reprisals
- encourage the reporting of behaviour which breaches our codes and policies
- always promote appropriate standards of conduct

Workplace conflict or disagreement with management decisions does not, of itself, constitute a workplace complaint. Reasonable management action carried out in a fair and lawful manner is not grounds for a workplace complaint.

Workplace complaints include:

- bullying, harassment, discrimination, victimisation and unreasonable behaviours
- behaviours which create harm to health and safety, both physical and psychological
- interpersonal conflict where the parties request assistance from others for resolution

- pay and workload issues
- Breaches of our policies or misconduct including failure to report compliance matters internally and externally
- General workplace conditions including concerns about resources, processes, training or treatment that affect an worker's ability to work effectively

SCAC recognises that **all personnel have the right to:**

- be treated with respect and courtesy
- disagree with management decisions
- lodge a workplace complaint at any time
- have that complaint taken seriously and appropriately assessed
- where required investigated – see Investigations Policy and Procedure
- resolved fairly, promptly and without delay.

SCAC **personnel have a responsibility to:**

- treat everyone with respect and courtesy
- accept that disagreeing with a management decision does not make the management decision wrong
- raise complaints with supporting information at an early stage
- cooperate fully with the investigation in order to resolve the complaint promptly

Victimisation or reprisal against a person who raises a complaint or participates in a complaint process is a serious breach of this policy and may result in disciplinary action, up to and including termination of employment.

Employees may request a support person to attend formal meetings relating to workplace complaints. The role of a support person is to provide support, not to advocate or represent the employee. The support person cannot be a person who will be involved in decision making about the workplace complaint.

Personnel should also refer to the *Bullying Harassment and Discrimination Policy and Procedure* and the *Investigations Policy and Procedure* where applicable.

Responsibilities

All personnel

- identify topics, gaps and areas where policy, procedure and instruction are needed
- manage effectively their own health and safety
- comply with this document
- maintain confidentiality if they provide information during the investigation of a complaint

Line managers

- monitor the work environment to ensure that acceptable standards of conduct are observed at all times and identify and manage issues with appropriate support
- treat all complaints seriously and take immediate action to document, assess risk, and resolve or escalate the matter in accordance with this document

ADS Risk & Compliance

- Ensure the document is reviewed every two-years using organisation wide consultative processes prior to approval
- Oversight of complaint trends
- Escalation of systemic risks

- Triage complaint information assigning to an appropriate manager for action

Principal

- policy owner and approver (biennially)
- Ensure this policy is implemented and effective
- identifies and manages any issues with appropriate support
- assigns resources for effective management of complaints within the College

Board

- Manage complaints involving the Principal

External avenues for appeal

Personnel may seek external advice from the Fair Work Ombudsman regarding their workplace rights. Dispute resolution processes may also be available under applicable industrial instruments.

Fair Work Ombudsman - www.fairwork.gov.au

Procedural information

Timeframes

SCAC aims to manage workplace complaints **as promptly as reasonably practicable**. Managers will acknowledge complaints within 3 working days. Timeframes for resolution will vary depending on the nature and complexity of the complaint. The manager will provide updates where appropriate.

Where delays are anticipated, all relevant stakeholders will be informed.

Should an investigation be required SCAC's *Investigations Policy and Procedure* is applicable.

Resolution

Workplace complaints will be found to be sustained, not sustained or a mediated outcome. These findings will be communicated to the complainant and person subject to allegation.

A workplace complaint is considered resolved when:

- all relevant stakeholders agree to the outcome, **or**
- the Principal determines that the matter has been appropriately addressed

Vexatious or Bad-Faith Complaints

Complaints found to be vexatious or made in bad faith may be dealt with under SCAC's disciplinary processes. However, SCAC's may still act on any complaint that identifies a genuine risk, even if the allegation is not ultimately sustained.

Support

SCAC recognises that raising or responding to workplace complaints may be challenging. The following supports may be accessed where appropriate:

- Employee Assistance Program (EAP)
- A support person at formal complaint or investigation meetings

Support person's role

A support person:

- may provide emotional or pastoral support
- may take notes

A support person must not:

- act as an advocate or representative

- be involved in decision making about the complaint
- answer questions on behalf of the employee
- actively participate in discussions, unless expressly agreed

Appeals

SCAC does not offer unlimited opportunities for appeal.

A complainant may appeal the resolution of a workplace complaint by writing to the Board Chair within 7 days of receiving the outcome of outcome.

An appeal will only be considered where there is evidence of a **procedural issue** in the handling or investigation of the complaint.

The Board Chair may:

- direct that the complaint be re-examined, or
- determine that the matter is closed

Confidentiality

Workplace complaints will be managed confidentially **to the extent reasonably practicable**.

Information may be disclosed on a **need-to-know basis** to:

- manage the complaint
- ensure safety
- ensure procedural fairness
- comply with legal or regulatory obligations (e.g. criminal or child protection matters)
- complaints must not be discussed generally with colleagues.

Mandatory External Reporting Pathways

Complaints must be escalated to:

- **NSW Police** - criminal matters
- **Department of Communities and Justice (DCJ)** - child protection
- **Office of the Children's Guardian** - reportable conduct

Withdrawing a complaint

A complainant may withdraw their complaint at any time by notifying the complaint or line manager in writing. SCAC may still act on or continue investigating the matter where appropriate.

Communication strategy

The most current approved version of the *Complaints Policy and Procedure - Workplace* will be available in the policy folder.

All personnel can provide feedback via the [Feedback](#) form on SCAC's website.

Induction and training

On induction and annually, personnel will receive or review the current *Complaints Policy and Procedure - Workplace*.

Compliance

Noncompliance with this policy and procedure may result in disciplinary action up to and including dismissal.