

CONCERNS, COMPLAINTS AND DISPUTES POLICY

Purpose

Perth College welcomes comments and feedback from the School community, including students, parents, external agencies and staff. All concerns and complaints are taken seriously. Most issues can be resolved easily by discussing them with the relevant people. However, if the matter is not resolved, members of the school community are encouraged to contact the relevant staff member in line with the School communication process (see Appendix 1, 2 & 3.) to raise the matter.

Policy Statement

Perth College implements the National Principles of Child Safe Organisations and is committed to providing a child friendly complaints process, which is child-focused and upholds the rights of young people. The School endeavours to overcome cultural barriers by fostering strong and safe partnerships with students, parents and the greater school community. These partnerships are based on inclusiveness, mutual respect and understanding. Any member of the school community, or the community at-large, who lodges a concern or complaint will be treated with respect, courtesy and sensitivity. Our aim is to ensure that:

- Perth College community members wishing to express a concern or complaint know how to do so.
- Complainants know that we listen and take complaints seriously.
- We respond to complaints promptly and in a courteous, respectful and sensitive way.
- Matters raised are investigated according to the School's policy and procedure.
- Outcomes are consistent with relevant school policies.
- Action is taken where appropriate.

Scope

This policy applies to:

- Current and former students of Perth College.
- Parents of current and former Perth College students.
- External agencies.
- Members of the Perth College community.

The Perth College Staff Handbook informs staff and volunteers of the procedure for internal complaints.

Definitions

Arbiter

A person who settles a dispute or has ultimate authority in a matter.

Arbitration

A voluntary process, involving a third person (arbitrator), who can impose a resolution. Arbitration may be undertaken after mediation, and/or conciliation.

Anonymous Complaint

A complaint lodged without a name or address of the complainant, or where the complainant states that they do not wish to be identified.

Complaint

An 'expression of dissatisfaction made to the School about its services, decisions, actions, or those of its staff, or about the complaint management process itself' (Source: Guide to Registration Standards for Non-Government Schools January 2020). This may be made about the school, about a specific department in the School, about a particular school activity, about an individual member of staff, or about one or more students. For the purpose of this policy, the term 'complaint' also refers to a 'concern' or dispute with Perth College arising out of or as part of the expression of dissatisfaction.

Complainant

A person who lodges a complaint.

Conciliation

A process whereby a third party assists the parties to a dispute to communicate their concerns to each other with the aim of finding resolutions.

Concern

A matter of interest raised informally to provide feedback or get clarification.

Child abuse

Physical abuse occurs when a child is severely and/or persistently hurt or injured by an adult or a caregiver.

Sexual abuse occurs when a child is exposed to, or involved in sexual activity that is inappropriate to the child's age and development level, and includes sexual behaviour in circumstances where:

- The child is the subject of bribery, coercion, threat, violence or exploitation.
- The child has less power than another person involved in the behaviour.
- There is a significant disparity in the developmental function or maturity of the child and another person involved in the behaviour.

Emotional abuse includes:

- Psychological abuse.
- Being exposed to an act of family and domestic violence.

Neglect is when children do not receive adequate food or shelter, medical treatment, supervision, care or nurturance to such an extent that their development is damaged, or they are injured. Neglect may be acute, episodic or chronic.

- Adequate care for the child.
- Effective medical, therapeutic or remedial treatment for the child.

Corporal Punishment

Any punishment in which physical force is used and intended to cause some degree of pain or discomfort, however light; typically involving hitting the child with the hand or with an implement; it can also include, for example, forcing the child to stay in an uncomfortable position. It does not include the use of reasonable physical restraint to protect the child or others from harm.

Degrading Punishment

Any punishment which is incompatible with respect for human dignity, including corporal punishment and nonphysical punishment which belittles, humiliates, denigrates, scapegoats, threatens, scares or ridicules the child.

Culturally safe complaint handling process

One which overcomes cultural barriers and taboos to disclosure, provides culturally appropriate means of making complaints, is managed by people who are aware of and sensitive to potential complainant's culture and cultural attitudes, including those arising from historical trauma and mistrust of authorities, and which facilitates access to culturally appropriate therapeutic and other services as required.' (Source: *The Royal Commission into Institutional Response to Child Sexual Abuse*)

Mediation

A process where the parties, assisted by a third person, listen to each other, define the dispute, find points of agreement, investigate what is important to each party with the goal of reaching a workable agreement through the development of satisfactory options for resolution for each party.

Parent

For the purpose of this policy, refers to parents, guardians and carers.

Procedural fairness

The rules of procedural fairness require:

- A hearing appropriate to the circumstances.
- Lack of bias.
- Evidence to support a decision.
- An enquiry into matters in dispute.

Principles

The following principles apply to all processing of all complaints received by Perth College:

- Complaints can be lodged either:
 - In person.
 - By telephone.
 - In any form of writing (e.g., letter, email, SMS).
 - Anonymously.
- All complaints will be listened to and taken seriously.
- All complaints will be responded to promptly and in a courteous, respectful, and sensitive way.
- Matters raised will be investigated according to the school's policy and procedure.
- Action will be taken where appropriate.
- Confidentiality will be maintained by all parties, unless in the case of a student complaint where it may be appropriate for the parent to be advised. Students will be made aware of any limits of confidentiality.
- Where required, reports will be made to relevant authorities and/or law enforcement agencies.
- Procedural fairness will apply.
- Records will be maintained in accordance with the School's Privacy Policy and Records

Management Policy.

- Complaints will be analysed to identify causes and to inform continuous improvement.
- Complaints will be reviewed and evaluated in order to continually improve child-safe practices.
- Relevant review findings will be reported to parents, students, staff and school community members.

Anonymous Complaints

The School encourages school community members to raise concerns directly, rather than anonymously, by giving a reassurance of confidentiality. In the event of an anonymous complaint, it will be at the Principal's discretion as to what action, if any, can and should be taken, depending on the nature and circumstances of the complaint. Anonymous complaints will be recorded in the complaint register and reviewed.

Complaints Relating to Grooming and Child Abuse

The procedure for handling a complaint received relating to grooming and child abuse of a current, or former student by a current or former school staff member, or by another person during a school-arranged activity, is described in the Perth College Child Protection Policy. The allegation may result in a mandatory or non-mandatory report. As defined in the Reportable and Critical Incident Policy, it is to be reported to the Director General as soon as practicable, and in any event within 48 hours of the incident. This also applies in the case of a formal warning being issued to a staff member for breach of the Perth College Code of Conduct in respect to grooming behaviour. Perth College explicitly forbids any form of child abuse, corporal punishment or other degrading punishment as defined in this policy. The Child Protection Policy and the Reportable and Critical Incident Policy are available on the School website (www.perthcollege.wa.edu.au). Copies may also be requested from the main reception.

Complaints about child abuse, grooming or other harm, or other breaches of our Codes of Conduct relating to students by:

- current or former staff members;
- current or former students;
- other people at Perth College premises or at events;

are managed differently from other complaints arising from the additional confidentiality and privacy requirements surrounding these kinds of matters.

If your complaint is a child safety-related complaint, please make your complaint to the Principal, principalpa@pc.wa.edu.au or 08 9471 2103 or if this person is the subject of your complaint please notify Chair of School Council, PCCouncilChair@pc.wa.edu.au.

Responsibilities

Principal

The Principal has a responsibility to:

- Comply with the Perth College Code of Conduct.
- Adhere to the Principles of Child Safe Organisations and uphold the rights of young people.
- Consult, develop and implement a child-friendly Concerns, Complaints and Disputes Policy and procedure, which is child-focused and culturally safe.
- Foster an open culture that encourages school community members to speak up about their concerns.
- Ensure the school community members know how to express a complaint and understand that these will be taken seriously.
- Ensure staff and volunteers are conversant with the School's complaint handling processes and well informed about their role and responsibilities.
- Ensure all complaints are taken seriously.
- Ensure the different ways that young people express concerns or distress and disclose harm are recognised and that staff and volunteers are adequately trained to respond appropriately.
- Ensure appropriate and timely action is taken if the complaint raises any immediate risks to the safety of the complainant or to a student.
- Ensure students are offered ongoing support throughout the complaint handling process.
- Ensure investigations of complaints are thorough and free from bias and as per policy and procedure.
- Ensure all parties are adequately informed and timeframes are clarified.
- Ensure confidentiality is maintained, unless in the case of a student complaint where it is deemed appropriate to advise the parent.
- Maintain a detailed complaint register.
- Ensure records are maintained in accordance with relevant school policies.
- Report complaints to relevant authorities and co-operate with law enforcement.
- Practice procedural fairness.
- Ensure outcomes are consistent with relevant school policies.
- Regularly evaluate and review complaint handling procedures.
- Ensure reporting, privacy and employment law obligations are met.

Staff

Staff have a responsibility to:

- Comply with the Perth College Code of Conduct.
- Adhere to the Principles of Child Safe Organisations and uphold the rights of young people.
- Understand the School's complaint handling process and be well informed about their role and responsibilities.
- Encourage an open culture that encourages school community members to speak up about their concerns.
- Take all complaints seriously.
- Recognise the different ways young people express concerns or distress and disclose harm.
- Ensure appropriate and timely action is taken if the complaint raises any immediate risks to the safety of the complainant or to a student.
- Ensure the student receives ongoing support throughout a complaint process.
- Ensure investigations of complaints are thorough, free from bias and as per policy and procedure.
- Keep all parties adequately informed and clarify timeframes.
- Maintain confidentiality, unless in the case of a student complaint, where it is deemed appropriate to advise the parent.
- Maintain records of any complaints in accordance with the relevant school policies.
- Report complaints to relevant authorities and co-operate with law enforcement.
- Practice procedural fairness.
- Ensure outcomes are consistent with relevant school policies.
- Regularly evaluate and review complaint handling procedures.
- Ensure reporting and privacy obligations are met.

Volunteers

Volunteers at Perth College have a responsibility to:

- Comply with the Perth College Code of Conduct.
- Adhere to the Principles of Child Safe Organisations and uphold the rights of young people.
- Understand the School's complaint handling process.
- Report any complaint received to their supervising staff member, or if appropriate, to the Principal. If the complaint is about the Principal, it should be referred to the Chair of College Council.

Continuous Improvement

Perth College seeks continuous improvement by:

- Welcoming feedback and suggestions from students, parents, staff, volunteers and external agencies.
- Analysing complaints to identify causes to inform continuous improvement.
- Reviewing and evaluating complaints in order to continually improve child-safe practices.
- Reviewing the complaint handling process

Suggestions and feedback may be:

- Conveyed to any member of staff, either by phone or in person. The School communication process should be used as a guide (See Appendix 1).

- Emailed to suggestions@pc.wa.edu.au
- Posted to Attn: The Principal, Perth College, 31 Lawley Crescent, Mt Lawley, WA 6050
- Students may also submit feedback via SPACE.

Lodging a Complaint – Students

- Students can speak to the Principal, or any member of school staff with whom they feel safe and comfortable, about anything that may make them feel unsafe, unhappy or worried.
- Complaints can be submitted verbally, or in writing by letter or email or via SPACE.
- Students may choose to remain anonymous when giving feedback via the student comment box. Although it may not be possible to obtain sufficient details when a complaint is lodged anonymously, it will still be accepted, recorded, evaluated and actioned to the extent possible, in respect to the information that it contains.
- The complaint will be investigated, and students will be offered ongoing support throughout the process. If the issue is deemed to be major, it may be escalated to the Principal.
- The outcome of the investigation and a resolution will be discussed with the student. If appropriate, the parent may be advised. Depending on the complaint, information may also need to be shared with other organisations, such as the police.
- If a resolution is not reached, or if the Principal is the subject of the complaint, it may be then escalated or appealed to the Chair of the Perth College Council.
- The School Council Chair will review the complaint and determine an outcome. If the Chair considers it appropriate, the Chair may refer the complaint to an independent reviewer. The determination of the Chair or independent reviewer (if referred), will be the final and binding step in the School's internal process.
- The student will be offered support throughout this process.

Lodging a Complaint - Parents and School Community Members

Parents and school community members can direct minor concerns or complaints to any staff member as per the School communication process (see Appendix 1, 2 & 3). If the matter has not been resolved informally, or if the complainant wishes to make a formal complaint, they may do so by writing to the Principal.

Letters are to be addressed to:

Attn: The Principal, Perth College, 31 Lawley Crescent, Mt Lawley, WA 6050

Emails are to be addressed to: principalpa@pc.wa.edu.au

Once received, a complaint will be forwarded to the Governance, Risk, Compliance and Safety Officer and acknowledged within three (3) working days of receipt. The Principal will determine which person such as the Governance, Risk, Compliance and Safety Officer or member of the Leadership Team or Principal (if necessary) will investigate the complaint. The Concerns and Complaints Management Procedures outlines the Steps to be taken by the School when dealing with a complaint.

If determination of the complaint is not acceptable, to the complainant, or if the Principal is the subject of the complaint, the complaint it may be escalated or appealed (as the case may be), to

the Chair of School Council.

Letters are to be addressed to:

Attn: Chair of Perth College Council, Perth College, 31 Lawley Crescent, Mt Lawley, WA 6050

Emails are to be addressed to: PCCouncilChair@pc.wa.edu.au

The Chair of School Council will review the complaint, all materials obtained in the investigation and any determination consequently made and notify the complainant of the outcome of their review within 14 days. A meeting with the Principal and the Chair of School Council may be arranged in order to discuss the matter further and potential alternative resolutions. As an alternative to conducting the Chair conducting the review, the Chair may if the Chair considers it appropriate, refer the appeal to an independent person to review the complaint, all materials obtained in the investigation and any determination consequently made.

The determination of the Chair or independent reviewer (if referred) will be the final and binding step in the School's internal complaints process.

All complaints are treated in a confidential manner and with respect. Knowledge of the matter will be limited to the Principal, Governance, Risk, Compliance and Safety Officer, those directly involved and if relevant, the Chair of School Council.

It is the School's policy to ensure that complaints made by parents do not adversely impact their children. The School will not tolerate victimisation or adverse consequences shown towards a person who raises a complaint.

Referral to the Department of Education

The Director General of the Department of Education is responsible for ensuring that Perth College observes registration standards, including the standard about its complaint handling system. Any student, parent or community member is entitled to contact the Director General with concerns about how the School has dealt with a complaint. Information is available on the Department of Education website (www.education.wa.edu.au/non-governmentschools-complaints). While the Director General may consider whether the School has breached the registration standards, the Director General does not have the power to intervene in a complaint or override the School's decision.

Associated Policies and Procedures

Child Protection Policy
Staff Code of Conduct
Student Complaints Procedure
Pastoral Care Policy and Procedures
Equal Employment Opportunity and Harassment Policy
Staff Harassment Procedures
Reportable and Critical Incident Policy
Mandatory Reporting of Child Sexual Abuse Procedures
Concerns and Complaints Management Procedure

Relevant Legislation and Authority

School Education Act 1999
School Education Regulations 2000
The National Quality Framework for Early Childhood Education and Care
National Code of Practice for Providers of Education and Training to Overseas Students 2018
Education Services for Overseas Students (ESOS) Act 2000
Education Service Providers (Full Fee Overseas Students) Registration Act 1991 (WA) (ESPRA)
The Privacy (Enhancing Privacy Protections) Act 2012
The Privacy Act 1988
National Principles for Child Safe Organisations

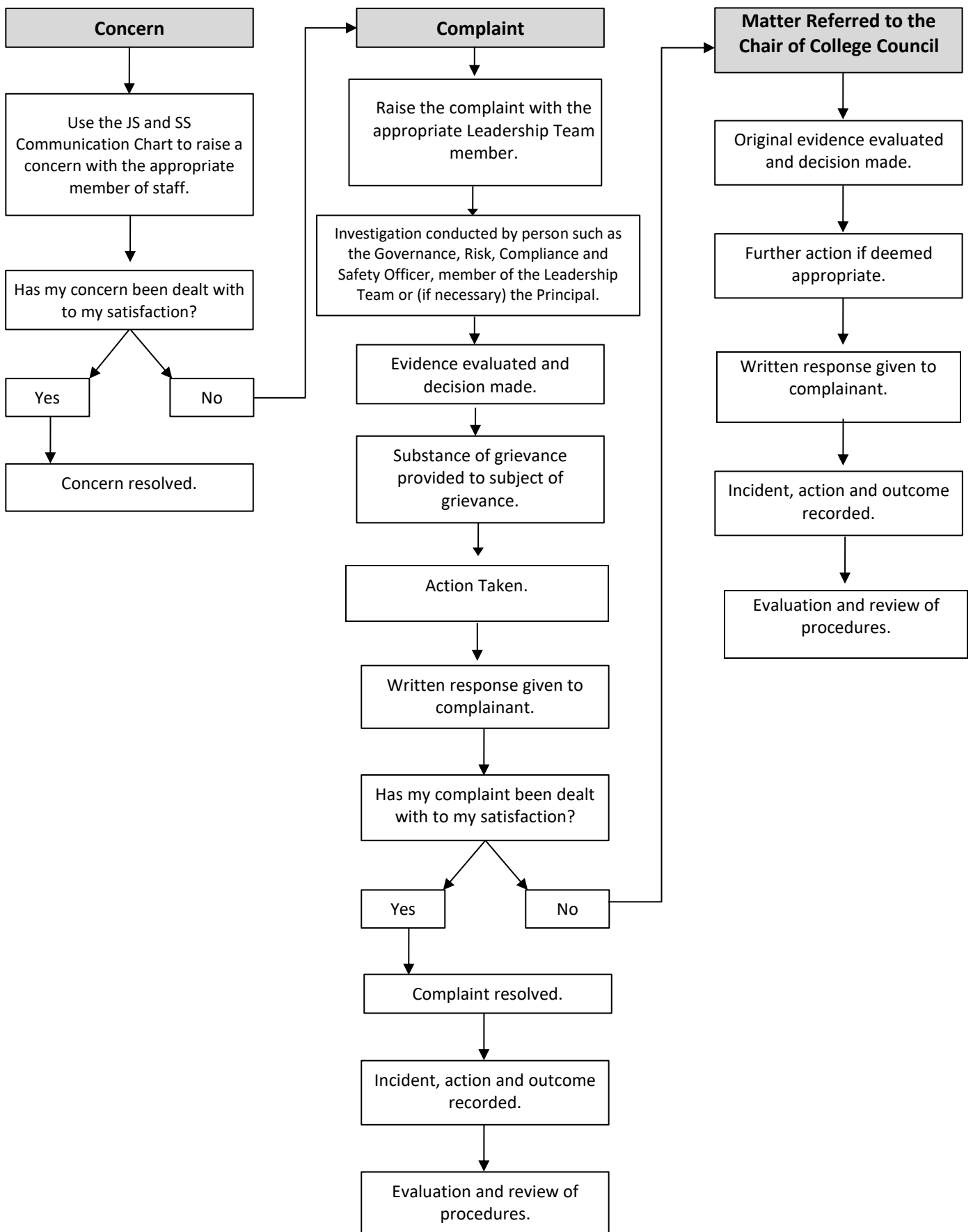
Since there are visa implications with Full Fee Paying Overseas Students (FFPOS) complaints are covered under the Education Services for Overseas Students (ESOS) Act 2000 and the National Code 2018, and handling of these are covered by the School's FFPOS Complaints and Appeals Procedures available from the School directly.

Review

This policy will be reviewed on an annual basis.

Date Approved	2004
Date for Review	May 2024
Policy Owner	Principal
Authorisation	Council
Amendment History	
Date	Amendment
May 2023	Approved by School Council [Principal]
July 2022	Full review. Minor adjustments [Principal; Vice Principal]
February 2022	Policy approved by School Council [Principal]
January 2022	Annual policy review. Complainants feeling 'culturally safe' and our complaints process being culturally appropriate. (ensuring all recognize and understand how to make a complaint). Conduct analysis of complaints and incidents and share findings outlining continuous improvement measures to minimise concerns of parents, staff and students. (This acts to address the link between poor complaint handling and student safety and wellbeing - a Royal Commission on Child Abuse outcome). Role of DG in our compliance with complaints handling (recommended standard blurb included). Anonymous complaints need to be recorded and considered (within reason). [Principal]
January 2021	Annual policy review. No changes made. Procedures reviewed with minor updates. Amendment made to reflect that operational concerns and complaints to be handled by the School [Principal]
March 2019	Annual policy review. No changes made [Principal]
March 2018	Minor changes. [Principal]
March 2014	Policy amended to conform with enhanced federal Privacy legislation enforced from 12 March 2014. [Executive]
March 2013	Flowchart amended to include information on procedure if complaint is withdrawn. [Deputy Principal – Staff]
January 2013	Major re-working of both the policy statement and procedures undertaken to reflect current best practice.

FLOWCHART OF INTERNAL HANDLING OF CONCERNS AND COMPLAINTS



Note: If at any stage of the process the complaint is withdrawn by the complainant, written confirmation of this will be provided by the School to the complainant.

Student Complaints (available in the Student Diary)

Every student at Perth College has the right to feel speak up about how they feel about something that is affecting them. Everyone has the right to tell someone if they feel worried, afraid or if they do not feel safe. The School will take what you have to say seriously and wants to help.

How do I make a complaint?

- By talking about it – or by writing it down if that’s easier. You can speak to any staff member with whom you feel safe and comfortable, including the Principal.
- You can do it by yourself, with a friend, as part of a group, or through your parents or another adult that you trust and or feel safe with.

Who can I talk to?

- To anyone on staff, to anyone in the school that you feel safe and comfortable with, or you can talk to a family member who you trust and feel safe with.

Does it matter what the issue is?

- No, it can be a big problem, or a small one. Talking things over can often help to find solutions.

What will happen next?

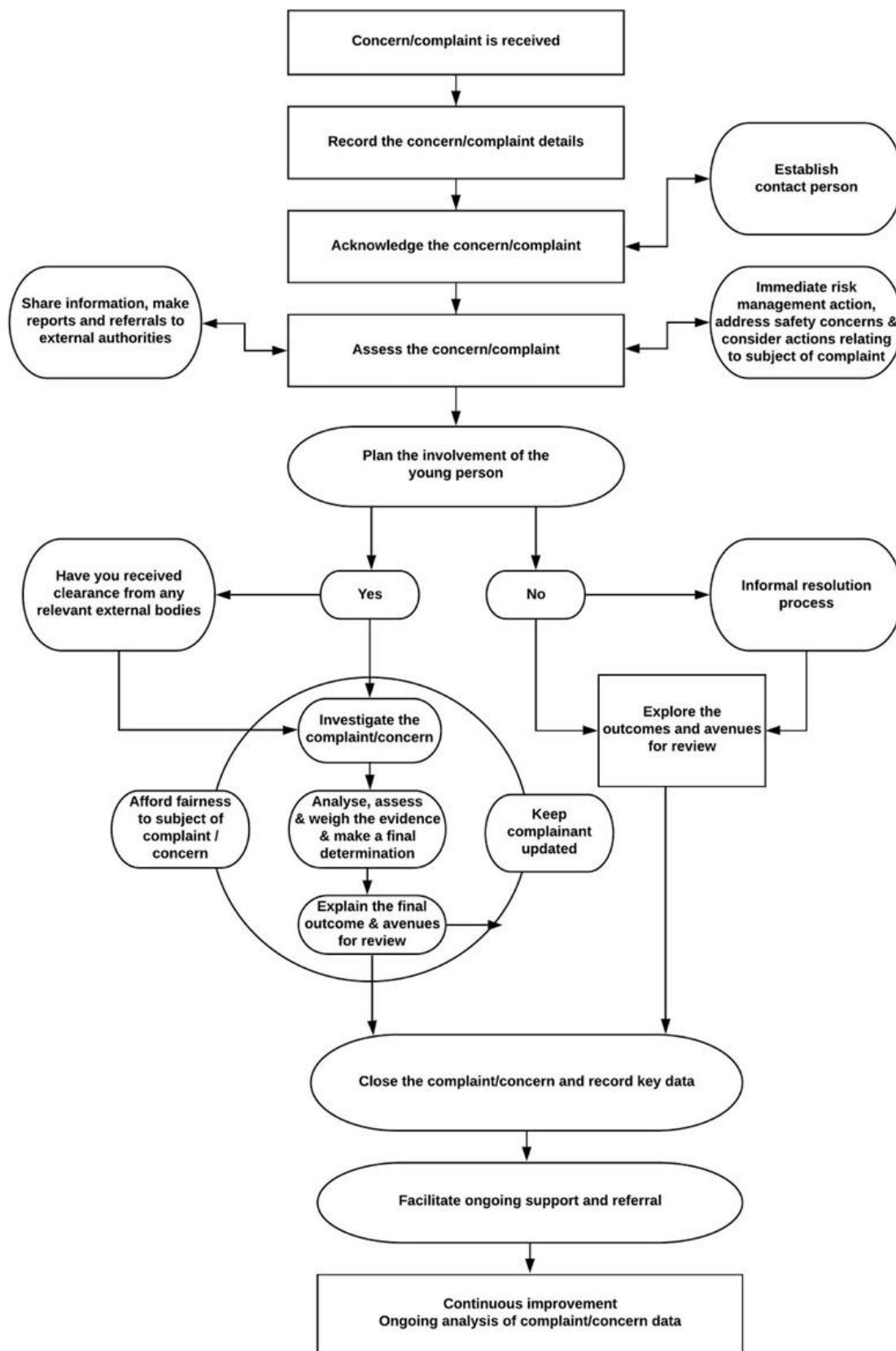
- If possible, the staff member will deal with it in person. If not, he or she will explain who it needs to go to and why.
- We will ask you how you would like us to keep you updated on what is happening with your concern or complaint. We will support you in managing whatever is troubling you.

Do others have to know?

- Depending on the situation or complaint, the person you talk to might need to refer the problem to someone else.

Even if you find the issue hurtful or embarrassing, we encourage you to talk to us, as we want to make sure you feel safe and happy at the School.

PROCEDURE FOR HANDLING COMPLAINTS/CONCERNS RECEIVED FROM STUDENTS



Source: National Office for Child Safety: Complaint Handling Guide: Upholding the rights of children and young people

CONCERNS AND COMPLAINTS MANAGEMENT PROCEDURES

The steps outlined below (together with the flowchart) are intended to provide guidance as to how Perth College handles complaints.

Culturally Safe Complaints Management

Perth College values diversity and does not tolerate any discriminatory practices. To achieve this, we support the cultural safety, participation and empowerment of Aboriginal and Torres Strait Islander students and their families.

The School's complaint handling system is one which is culturally safe and overcomes cultural barriers and taboos to disclosure – our complaints handling process is managed by people who are aware of and sensitive to potential complainant's culture and cultural attitudes.

Every incident will vary in degree of seriousness and not all parts of the steps outlined below will be required to be undertaken in every circumstance.

Step 1 – Dealing with Concerns (Informal Complaints)

There are likely to be many occasions where someone makes a statement, or sends an email, that is an expression of dissatisfaction as to some aspect of Perth College's service or operations where a resolution can be quickly and easily achieved, usually through verbal communications. In many of these instances the person making the statement, or writing the email, may not even consider that they are making a 'complaint'. Often, they may simply be offering 'constructive feedback'.

By way of example:

In a meeting with a teacher a parent notes that the information on SPACE is often not updated. This has led to conflicts at home as the parents have not been able to monitor whether or not the child has completed their homework on time.

This is clearly an expression of dissatisfaction as to an aspect of the School's operations and thus falls within the definition of a complaint.

It is also a relatively minor complaint that can probably be managed through a verbal acknowledgement and undertaking to 'rectify the issue'. In this circumstance, the parent would probably not expect to receive a formal written acknowledgement of their complaint and most certainly would not expect the matter to be escalated.

Whilst this complaint may on the surface appear to be minor, if the School was to receive numerous such complaints from parents, it would indicate a systemic issue which would require formal rectification action. It is for this reason that even minor complaints should be recorded.

Step 2 – Receiving and Logging Complaints

All complaints received (whether verbally or in writing), must be forwarded to the Governance, Risk, Compliance and Safety Officer for logging in the complaints register.

In the event that a complaint, whether it be written or verbal, is received and is not an informal complaint that can be resolved immediately, the Governance, Risk, Compliance and Safety Officer must send a written acknowledgement of the complaint to the complainant within three (3) business days of receipt of the complaint. In less serious instances this written acknowledgement

may be a relatively informal email communication. As the seriousness of the complaint increases the formality of the communication should also increase.

A copy of the School's Concern's, Complaints and Disputes Policy and these Procedures must be included in the initial communication to the complainant.

Verbal Complaints

When a complaint is received verbally, either over the telephone or during a face-to-face meeting, it is important to follow the general guidelines below for dealing with the complainant's feelings:

- **Listen** – this is the first step in reducing the tension. In face-to-face meetings, listening involves body language as much as the ears.
- **Acknowledge the complainant's feelings** – denying that the complainant is upset, or has the right to be upset, may antagonise them.
- **Empathise** – put yourself in the shoes of the complainant. This relieves tension so opens channels of communication.
- **Do not offer excuses, or argue** with the complainant.

It is important that the facts of the incident be gathered without judgement. The following guidelines are designed to assist in this regard.

- Ask open questions to elicit the facts about the complaint in a polite and even-handed manner.
- Record the facts you gather and confirm the details you have recorded before you finish the conversation with the complainant.
- Outline the process for investigating the complaint without appearing to dictate terms.

Staff should use their initiative as to how to proceed having regard to these guidelines. Where the complaint is more serious, staff should without delay, refer to the matter to a member of the Leadership Team and the Governance, Risk, Compliance and Safety Officer.

Written Complaints

- All written complaints must immediately be forwarded to the Governance, Risk, Compliance and Safety Officer.
- The Governance, Risk, Compliance and Safety Officer will log details in the Complaints Register.
- The Governance, Risk, Compliance and Safety Officer will acknowledge receipt of the complaint and consult with the Principal about the procedure to be followed with an investigation or otherwise responding to the complaint.

Step 3 – Establishing the Facts and Communicating with the Complainant

Once a complaint has been accepted an internal investigation will be carried out.

In the event the complaint involves a specific member of staff the investigation will be conducted as follows:

- Stage 1** A member of the Leadership Team or delegated staff member will immediately contact the relevant staff member (if applicable) named within the complaint and agree a time (within 48 hours), to meet to discuss the matter and gain access to relevant documentation.
- Stage 2** At this meeting the staff member will be provided with details of the complaint and asked to provide their version of events. The meeting will be documented.
- Stage 3** The facts of the complaint with the staff member's response will be matched and, through communication with the staff member and the complainant clarify why any facts differ.
- Stage 4** A report summarising key findings of the investigation will be prepared by the member of Leadership undertaking the investigation and submitted to the Principal and Governance, Risk, Compliance and Safety Officer.

In the event the complaint concerns a matter which is not related to a specific member of staff (e.g. misleading material in a publication), the Governance, Risk, Compliance and Safety Officer after consulting with the Principal, will conduct an investigation based on the incident priority considering criteria such as severity, complexity, impact and the need and possibility of immediate action.

The Governance, Risk, Compliance and Safety Officer member of the Leadership Team responsible for addressing a complaint will within reason keep in contact with the complainant, advising the status of the matter and each time confirming when the next communication should be expected.

Step 4 – Making a Determination

After considering the report provided under Stage 4 and any other relevant factors, the Principal must make a determination about the complaint and any action or resolution necessary as a result of the investigation and findings

Step 5 – Presenting the final Response

The outcome of the investigation determination by the Principal, must be advised to the complainant in writing. This communication should set out:

- the substance of the original complaint;
- an outline of the investigation undertaken;
- the findings of the investigation; and
- any proposed action or resolution.

The outcome can as considered appropriate, be provided to the complainant at a meeting.

Step 6 – Complaints Register

A Complaints Register will be maintained by the Governance, Risk, Compliance and Safety Officer.

The Complaints Register is reviewed in Leadership meetings and key information provided to the School Council on a regular basis with a focus on patterns and trends emerging over time.

Step 7 – Rectification Risk Management

Whether a complaint has been resolved internally or not, it is important to consider the circumstances that lead to the complaint arising and as to whether or not there exists an opportunity to improve our internal systems and procedures, so as to reduce the risk of such a complaint occurring again.

In order to clarify whether or not rectification work is required, the Governance, Risk, Compliance and Safety Officer will meet with the person responsible for the relevant area of work, review the underlying factors leading to the complaint being made, and make a recommendation to the Principal as to what, if any, rectification work is required.

Step 8 – Closure

The complaint will be closed once:

- the complaint has been resolved with the complainant (either internally or externally) or all reasonable internal and external options of recourse have been exhausted;
- all relevant information has been captured in the relevant complaint instance;
- consideration has been given to the underlying risk associated with the complaint; and
- any recommendations with respect to rectification work have been recorded.

Timeframes for Managing Complaints Internally

The School endeavours to immediately acknowledge the receipt of complaints and address them promptly in accordance with their degree of urgency.

Acknowledgement should be made as soon as practicable and in any event within three (3) working days.

The School aims to resolve all complaints within 14 working days with the initial investigation completed within seven (7) days. However, the circumstances of the complaint may change the timeline for the process.

If the School is unlikely to be able to resolve a complaint within 14 working days, the person

managing the complaint will, prior to the 14 day period:

- contact the complainant by telephone if possible, or otherwise in writing;
- advise them of the reasons for the delay in resolution of their complaint; and
- advise them of a new target resolution date.

The person managing the complaint will then keep the complainant regularly apprised of the status of their complaint.

Maintaining Confidentiality

Maintenance of confidentiality of information throughout the complaints management process is critical.

Confidentiality applies with respect to both information relating to the complainant, and, if relevant, to a person against whom a complaint is made.

Personally identifiable information about a complainant will only be made available for the purpose of addressing the complaint and (unless the complainant consents) be actively protected from disclosure.

Where a staff member receives a complaint and logged the complaint with the Governance, Risk, Compliance and Safety Officer, they will not discuss the complaint with students, other parents or any person who does not have the authority to investigate or manage complaints on behalf of Perth College. In addition, the details of the complaint will not be discussed with other staff members who are not authorised to manage the complaint.

All written communications relevant to the complaint must also be kept confidential.

Record Keeping

Complete records of all individual complaints received, together with data regarding the overall performance of our complaints handling process are recorded and accessible to management, if required.

The School applies the guiding principles that whenever dealing with a complaint, and in particular when recording information relating to a complaint, that the information may at some time in the future, be requested by the complainant or a regulator, or may be made public as a result of litigation (whether related or unrelated to the particular complaint). The School complaint records are maintained in a format which allows them to be provided to a regulator or complainant if so requested.

In the event that any particular information relating to a complaint is requested by an external party we will consider all of the circumstances of the request and if necessary, seek legal advice as to what, if any information, we are legally required to provide.

All records are maintained for a minimum of seven (7) years.

Maintenance

All complaints are classified and then analysed to identify systemic, recurring and single incident problems and trends, and to eliminate the underlying cause of complaints.

The School continually monitor the overall performance of our complaints handling processes having regard to the size, nature and complexity of our organisation and to historical complaints data. This includes taking action to determine the levels of satisfaction of complainants.

Improvement

The program is reviewed periodically to ensure that it continues to be effective and efficient. The information obtained from these reviews is used to continually improve the program.

Reporting to the College Council

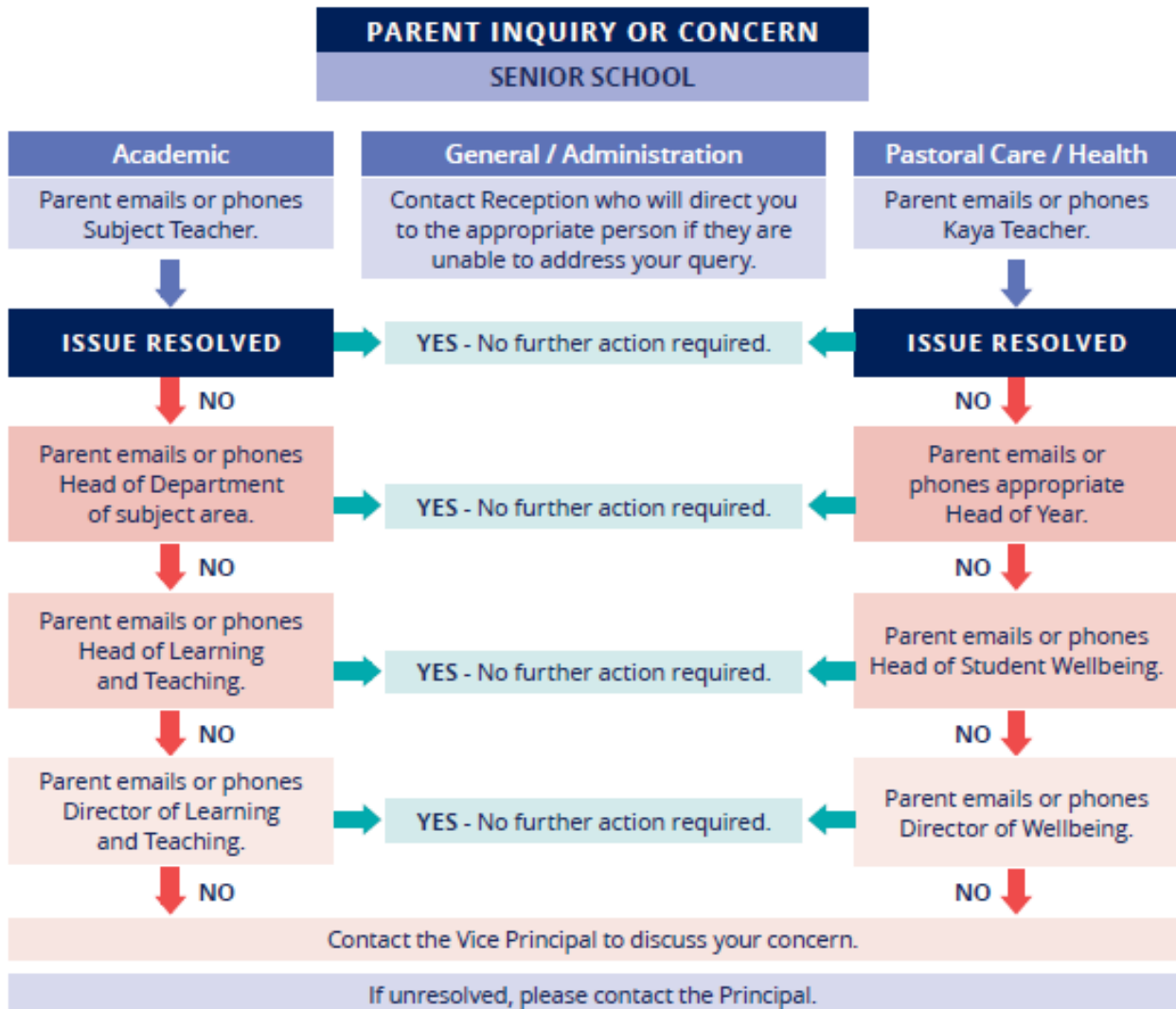
It is critical that the Chair of College Council, Principal and Leadership Team are notified of significant complaints as quickly as possible and regularly informed as to Perth College's performance with respect to complaints handling.

It is the Governance, Risk, Compliance and Safety Officer's responsibility to provide to the Principal and the Leadership Team and School Council on a quarterly basis, a report summarising the complaints received.

Appendix 1:

Senior School Communication Process

For questions or concerns, the communication flowchart below provides the process to follow.



EMAIL CONTACT

Staff can be contacted by email using the following: firstname.surname@pc.wa.edu.au
It is reasonable to expect a reply to a parent communication within two working days.

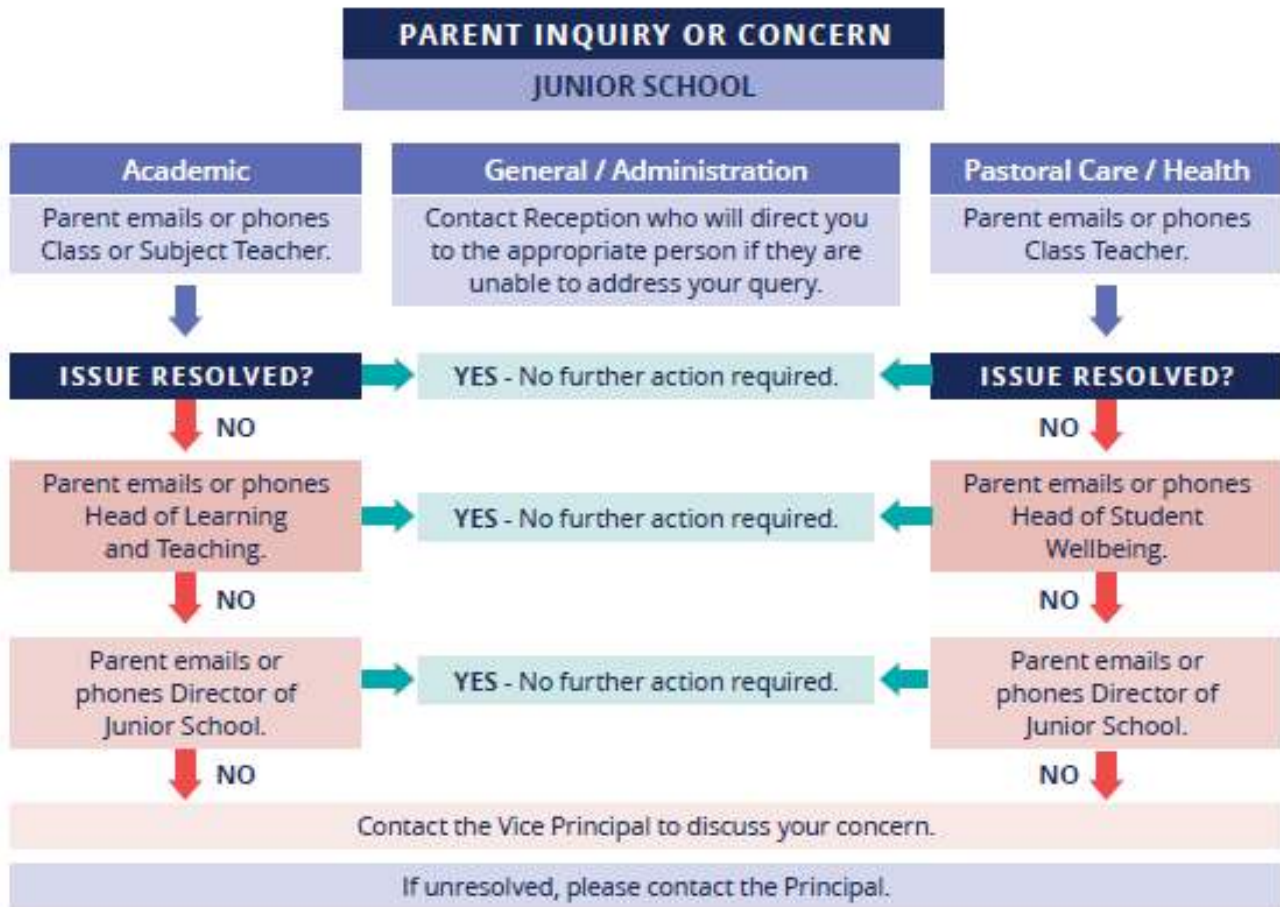
PARENT-TEACHER CONTACT

Learning Conferences are held once a year and offer an opportunity for feedback and discussion between parents and teachers about each student's progress.

Appendix 2:

Junior School Communication Process

For questions or concerns, the communication flowchart below provides the process to follow.



EMAIL CONTACT

Staff can be contacted by email using the following: firstname.surname@pc.wa.edu.au
It is reasonable to expect a reply to a parent communication within two working days.

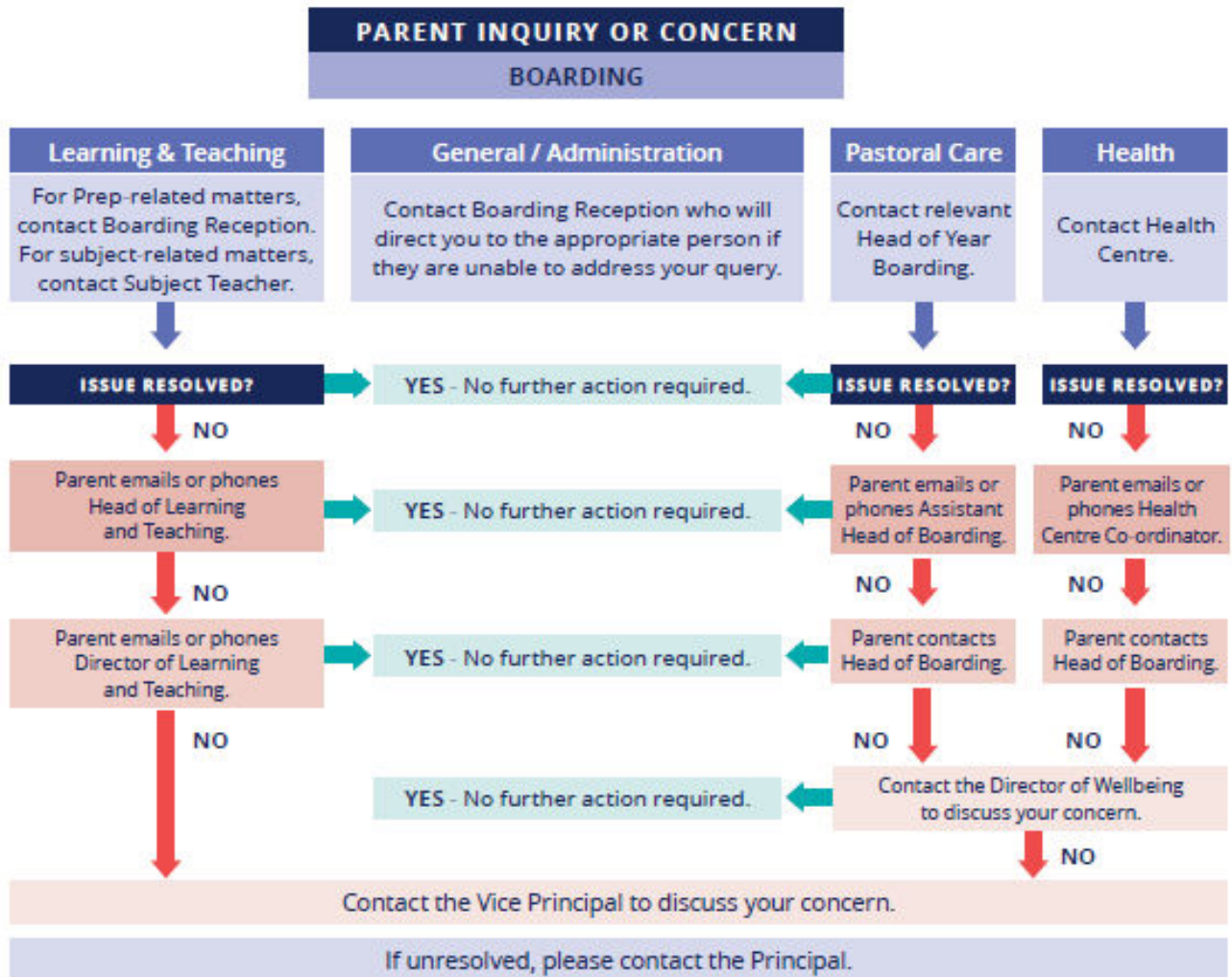
PARENT-TEACHER CONTACT

Learning Conferences are held three times per year in the Junior School and offer an opportunity for feedback and discussion between parents and teachers about each student's progress. Teachers can be contacted via email or phone outside of these formal discussions as necessary.

Appendix 3:

Boarding Communication Process

For questions or concerns, the communication flowchart below provides the process to follow.



USEFUL CONTACTS

Boarding Reception
(08) 9471 2180
boarding@pc.wa.edu.au

Head of Boarding
(08) 9471 2197
jill.miller@pc.wa.edu.au

Assistant Head of Boarding
(08) 9471 2180
tal.ashby@pc.wa.edu.au

Head of Years 7/8 Boarding
(08) 9471 2180
di.blackburn-hillier@pc.wa.edu.au

Head of Years 9/10 Boarding
(08) 9471 2180
mary.mynott@pc.wa.edu.au

Head of Years 11/12 Boarding
(08) 9471 2180
alexandra.handreck@pc.wa.edu.au

Health Centre
(08) 9471 2155
healthcentre@pc.wa.edu.au
Health Centre Co-ordinator
(08) 9471 2144
amanda.bright@pc.wa.edu.au