

MATER DEI COMPLAINT HANDLING POLICY

Source of Obligation

The NSW Registration manual (3.6.2) requires that a registered non-government school have in place and implement policies and procedures in relation to complaints, with specific reference to processes for raising and responding to matters of concern identified by students and/or parents/guardians.

Our Policy

Mater Dei is committed to ensuring that its students and their parents/guardians have the right to lodge a complaint or to appeal a decision of the Organisation and to have their concerns addressed in ways that ensure access and equity, fairness, accountability and transparency.

Mater Dei will provide a Complaints Management System that:

- is simple and easy to use
- enables us to respond to issues raised by people making complaints in a timely way
- provides information that can be used by us to deliver quality improvements in our services, staff and complaints handling processes
- is effectively communicated and promoted to all clients and stakeholders
- ensures complaints or appeals are fairly assessed and responded to promptly
- is procedurally fair and follows principles of natural justice, and
- complies with legislative requirements.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

Who does this Policy apply to?

This policy applies to all staff receiving or managing complaints about our services and/or our staff. Mater Dei expects all staff to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
CEO/Principal Head of Mater Dei	Promote a culture that values complaints and their effective resolution	Report publicly on Mater Dei's complaint handling. Provide adequate support and direction to key staff responsible for handling complaints. Regularly review reports about complaint trends and issues arising from complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. Encourage staff to make recommendations for system improvements. Recognise and reward good complaint handling by staff. Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaint data.

<p>Executive Assistant to the CEO/Principal</p>	<p>Establish and manage our complaint management system.</p>	<p>Provide regular reports to the CEO/Principal on issues arising from complaint handling work.</p> <p>Ensure recommendations arising out of complaint data analysis are canvassed with the CEO/Principal and implemented where appropriate.</p> <p>Train and empower frontline staff to resolve complaints promptly and in accordance with Mater Dei's policies and procedures.</p> <p>Encourage staff to provide suggestions on ways to improve the organisation's complaint management system.</p> <p>Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Recognise good complaint handling by staff.</p>
<p>Staff whose duties may include frontline complaint handling</p>	<p>Demonstrate exemplary complaint handling practices</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Assist people make a complaint, if needed.</p> <p>Comply with this policy and its associated procedures.</p> <p>Keep informed about best practice in complaint handling.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Provide suggestions to management on ways to improve the organisation's complaints management system.</p> <p>Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</p>
<p>All staff</p>	<p>Understand and comply with Mater Dei's complaint handling practices.</p>	<p>Treat all people with respect, including people who make complaints.</p> <p>Be aware of Mater Dei's complaint handling policies and procedures.</p> <p>Assist people who wish to make complaints access Mater Dei's complaints process.</p> <p>Be alert to complaints and assist staff handling complaints resolve matters promptly.</p> <p>Provide feedback to management on issues arising from complaints.</p> <p>Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</p>

Terms and Definitions

Complaint - Expression of dissatisfaction made to or about us, our service and/or our staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- staff grievances [see our Managing Grievance Policy]
- breaches of code of conduct
- matters relating to child protection [see our Child Protection Policy Suite]
- responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback']
- service requests [see definition of 'service request' below], and
- requests for information.

Complaint management system - All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

Dispute - An unresolved complaint escalated either within or outside of our organisation.

Feedback - Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our services or complaint handling where a response is not explicitly or implicitly expected or legally required.

Service request - A request regarding an organisation's core business that may include:

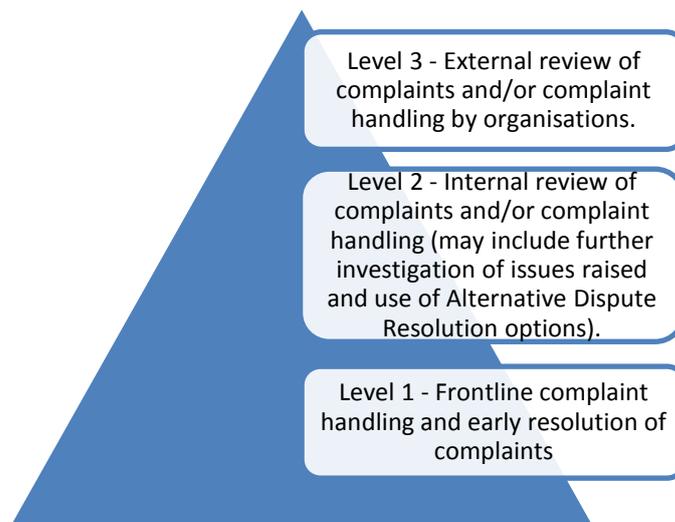
- routine inquiries about the organisation's business
- requests for the provision of services and assistance
- reports of failure to comply with laws regulated by the organisation
- requests for explanation of policies, procedures and decisions.

Grievance - A clear, formal written statement by an individual staff member about another staff member.

Staff grievances by an individual staff member about another staff member are dealt with through the Mater Dei Managing Grievance Policy.

Grievances about unlawful discrimination, harassment or bullying are dealt with through the Mater Dei Discrimination, Harassment and Bullying Statement for Employees, Contractors and Volunteers

The three levels of complaint handling



Mater Dei aims to resolve complaints at the first level, the frontline.

Where this is not possible, we may decide to escalate the complaint. This second level of complaint handling will provide for the following internal mechanisms:

- assessment and possible investigation of the complaint and decision/s already made, and/or
- facilitated resolution (where a person not connected with the complaint reviews the matter and attempts to find an outcome acceptable to the relevant parties).

Where a person making a complaint is dissatisfied with the outcome of Mater Dei's review of their complaint, they may seek an external review of our decision (by the Ombudsman for example).

Guiding Principles



Step 1 - Facilitate complaints

Mater Dei is committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

A person wishing to make a complaint may do so in writing or verbally to

- the staff member they were dealing with at the time
- the Program Manager of that staff member

- the CEO/Principal
- the Mater Dei Board of Directors, or
- The NSW Ombudsman

Telephone: 02 9286 1000

Toll free 1800 451 524

(TTY) 02 9264 8050

nswombo@ombo.nsw.gov.au

Written complaints may be sent to:

The Executive Assistant to the CEO/Principal
 Mater Dei
 229 Macquarie Grove Road
 CAMDEN NSW 2570
 PO Box 3090 NARELLAN NSW 2567
karent@materdei.org.au

A Complaint Handling Brochure Form is available in hard copy in the School Reception or as a soft copy on the school website.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- provided with information about our complaint handling process
- provided with multiple and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- provided with reasons for our decision/s and any options for redress or review.

Mater Dei will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Mater Dei will accept anonymous complaints and will carry out an investigation of the issues according to the 5 steps of the Complaint Management System where there is enough information provided.

Mater Dei will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance, including those people with disability, intellectual impairment and/or from culturally and linguistically diverse backgrounds.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their consent (e.g. advocate, family member, legal or community representative, member of Parliament, another organisation).

Step 2 – Respond to Complaints

Where possible, complaints will be resolved at first contact with Mater Dei.

Mater Dei will promptly acknowledge receipt of complaints and will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

Mater Dei is committed to managing people's expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and
- the possible or likely outcome of their complaint.

Mater Dei will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

Mater Dei will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

Mater Dei will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Mater Dei recognises that some complaints can be resolved promptly and with little formality and will therefore adopt flexible approaches to problem solving in order to enhance accessibility for people making complaints and/or their representatives.

Mater Dei will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

We will protect the identity of people making complaints where this is practical and appropriate and will ensure that personal information that identifies individuals will only be disclosed or used by Mater Dei as is permitted under the relevant privacy laws and any relevant confidentiality obligations.

Step 3 - Manage the parties to a complaint

All Mater Dei staff are empowered to implement our complaint management system as relevant to their role and responsibilities and are encouraged to provide feedback on the efficacy of all aspects of our complaint management system.

Mater Dei is committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible
- the health, safety and security of our staff, and
- our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

For further information on managing unreasonable conduct by people making complaints please see the Ombudsman's Managing Unreasonable Complainant Conduct Model Policy 2012.

Mater Dei Complaint Management System



When responding to complaints, Mater Dei staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

1. Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information on a **Complaints Record**.

The record of the complaint will document:

- the contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant and
- any additional support the person making a complaint requires.

2. Acknowledgement of complaints

Mater Dei will acknowledge receipt of each complaint promptly, and preferably within 28 working days. Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

3. Initial assessment and addressing of complaints

After acknowledging receipt of the complaint, Mater Dei will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

After assessing the complaint, Mater Dei will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

Complaints involving specific staff members or volunteers

External complaints by parent/guardians, students or stakeholders made against a staff member or volunteer will be managed by the CEO/Principal who will

- notify the staff member or volunteer of the complaint and its nature
- investigate the complaint and provide the staff member or volunteer with an opportunity to respond to any issues raised
- attempt to mediate the dispute (if appropriate) and/or attempt to resolve the matter to the satisfaction of the outside party, and
- take any other action necessary to resolve the issue.

Complaints involving the CEO/Principal will be managed by the Mater Dei Board of Directors.

Complaints involving members of the Mater Dei Board of Directors

Complaints made against a member of the Mater Dei Board of Directors will be referred to the Chairperson of the Mater Dei Board of Directors. The Chairperson, or their delegate, will

- notify the person about whom a complaint is being made of the complaint and its nature
- investigate the complaint and provide the Board Member with an opportunity to respond to any issues raised, and
- attempt to mediate the dispute (if appropriate) and/or attempt to resolve the matter to the satisfaction of the outside party..

Where the Chairperson of the Mater Dei Board of Directors is the subject of a complaint, the complaint should be referred to the Chair of Members of mater Dei Company.

If the matter remains unresolved, the Chairperson or notified office bearer will raise the matter at the next Board meeting. Depending on the seriousness of the complaint, the

Board may

- deal with the matter at its meeting, or
- refer the matter to the NSW Ombudsman.

Mater Dei will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

4. Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, Mater Dei will contact the person making the complaint and advise them:

- the outcome of the complaint and any action taken in response
- the reason/s for our decision
- the remedy or resolution/s that we have proposed or put in place, and
- any options for review that may be available to the complainant, such as an internal review, external review or appeal.

If in the course of investigation, we make any adverse findings about a particular individual, we will consider any applicable privacy obligations under the *Privacy and Personal Information Protection Act 1998* and any applicable exemptions in or made pursuant to that Act, before *sharing* our findings with the person making the complaint.

5. Closing the complaint, record keeping, redress and review

Mater Dei will keep comprehensive records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.

Mater Dei will ensure that outcomes are properly implemented, monitored and reported.

6. Alternative avenues for dealing with complaints

Parents/guardians, students or stakeholders may lodge an appeal if they disagree with a decision made by the Organisation, or by a staff member, related to Mater Dei

- in the way it provides a service
- if it fails to provide a service
- by withdrawing a service
- by varying a service, or
- in the way it administers a service.

An appeal should be made in writing using the Complaints Form and submitted to
Tony Fitzgerald
CEO/Principal
Mater Dei
229 Macquarie Grove Road
CAMDEN NSW 2570
PO Box 3090 NARELLAN NSW 2567

Alternatively they can seek an external review option available to them. Such options may include:

The NSW Ombudsman
Telephone: 02 9286 1000
Toll free 1800 451 524
(TTY) 02 9264 8050
nswombo@ombo.nsw.gov.au

Complaints Resolution and Referral Service CRRS
www.crrs.org.au

Abuse and Neglect Hotline
www.disabilityhotline.org

Australian Human Rights Commission
www.hreoc.gov.au

NSW Anti-Discrimination Board
Telephone: 02 9268 5544
Toll Free 1800 670 812
www.lawlink.nsw.gov.au/adb

7. Accountability and Learning

Mater Dei will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complaints received
- the outcome of complaints, including matters resolved at the frontline
- issues arising from complaints
- systemic issues identified, and
- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to Mater Dei's CEO/Principal and the Mater Dei Board of Directors for review.

Mater Dei will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, and
- identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

Mater Dei are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- support the making and appropriate resolution of complaints
- implement best practices in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

IMPLEMENTATION

This policy is implemented through a combination of:

- Informing students, parents/guardians of their rights and responsibilities with regards to complaints and appeals at the earliest possible stage of their involvement with the Organisation, including:

- how to make a complaint or lodge an appeal;
- the identified contact person for lodging a complaint or appeal;
- how Mater Dei will deal with the complaint or appeal, the steps involved and the timelines;
- their rights to an advocate, support person or interpreter;
- how they will be informed about the outcome of their complaint or appeal; and
- how to make a complaint to an external body including contact details.

The information will also be made available to clients through plain English, easy read and accessible versions of the document.

- Informing staff and management of their rights and responsibilities with regards to complaints at the earliest possible stage of their involvement with the Organisation.;
- Effective communication and notification procedures;
- Effective record keeping procedures; and
- Initiation of corrective actions where necessary.

RELATED POLICIES/STATEMENTS

Mater Dei Complaints Register

Mater Dei Grievance and Disputes Register

Mater Dei Staff Code of Conduct

Mater Dei Complaint Handling Process Brochure

Do you need to make a complaint about something happening at Mater Dei Brochure

Tell Someone Brochure

Mater Dei Discrimination, Harassment and Bullying Statement for Employees, Contractors and Volunteers

Approved at Leadership Team YES / NO / NA	Signed	Date
Approved at Board YES / NO / NA	Signed	Date
Staff Briefed YES / NO	Signed	Date
Review Date February 2019		