



# COMPLAINTS AND DISPUTE RESOLUTION PROCEDURE

## 1. Aim

Our school is committed to providing a safe, supportive, and respectful environment for all students, staff, and community members, built on a shared commitment to the common good (Mandate 6). In that spirit, Lumen Christi College welcomes feedback and recognises that from time to time there might be instances where individuals or organisations disagree with the way the College has managed matters and may wish to lodge a complaint.

The aim of this procedure is to outline the process to resolve disputes and complaints in a timely and fair manner in accordance with CEWA’s Dispute and Complaint Resolution Executive Directive and principles of procedural fairness, co-responsibility and subsidiarity.

## 2. Sources of Authority

CECWA POLICY	<a href="#">Community</a>
EXECUTIVE DIRECTIVE	<a href="#">Dispute and Complaints Resolution</a>
COUNCIL OF AUSTRALIAN GOVERNMENTS	<a href="#">Child Safe Organisations National Principles</a>
DEPARTMENT OF EDUCATION	<a href="#">Regulations for Non-Government School Standards</a>

## 3. Scope

This procedure applies to all students, staff, parents, caregivers, visitors, volunteers and members of the school community.

## 4. Definitions

TERM	DEFINITION
Informal Complaint	Is a concern or expression of dissatisfaction raised by a student, parent, staff member, or other stakeholder in a less structured manner—typically verbally or via informal channels (e.g., email, conversation). It is often addressed at the point of origin (e.g., with a teacher or staff member) and aims for a quick, practical resolution without invoking formal complaints procedure.
Formal Complaint	Is an expression of dissatisfaction submitted through or escalated via the College’s official complaints procedure. It typically follows unsuccessful informal resolution or involves serious or complex issues that require formal investigation and documentation
Dispute	Refers to a conflict where a belief held by one person/group of people is met with contrary claims and beliefs by another person/group of people

Procedural Fairness	Involves: (a) the right to be heard & (b) the right to an impartial decision ensuring that all individuals involved in a complaint are treated with respect, free from prejudice, intimidation, or harassment.
Complaints Register	A database that records all formal complaints and disputes where the information recorded includes specifics relating to the complaint, the process followed and the outcome.
Complainant	The person who is lodging the complaint
Respondent	The person against whom the complaint is lodged
Principal's Delegate	A staff member appointed by the Principal to act on their behalf in managing and/or resolving complaints. This is most likely a member of the Executive Leadership Team or the Executive Assistant to the Principal

## 5. Principles

The following key principles underpin a complaints process that honours the inherent dignity of every individual. They ensure that all concerns are addressed with respect, fairness, and confidentiality, in alignment with the College's Code of Conduct and commitment to a safe and supportive community

- A non-judgemental and non-adversarial, restorative approach will apply to resolving complaints and disputes following principles of procedural fairness and subsidiarity.
- The principle of subsidiarity requires that nothing should be done by a higher authority, agency or level that could be done as well or better by a lower one.
- All decisions are to reflect the paramount importance of the student(s).
- To ensure cultural safety, the College will endeavour to provide appropriate means for community members of all cultural backgrounds to make a complaint including, but not limited to, First Nations students, parents/caregivers and community members. The College will endeavour to ensure access to interpreters and other support people is available.
- Any person may complain orally or in writing about any matter. While complaints can be made anonymously, please be aware that doing so will limit the College's ability to investigate the complaint fully if we are unable to contact the complainant to obtain further details.
- Complainants are personally responsible and liable for the content of their complaints.
- The Principal ensures information about the complaints-handling process is readily available to students, staff and parents via the communication channels available.
- Where a CECWA policy statement or legislative ruling exists (such as an EBA) that addresses the issue raised, that policy statement or legislative ruling is followed.
- Once a decision has been made, parties may request a review of the decision, including escalating the dispute or complaint to the Executive Director of Catholic Education Western Australia (CEWA) or the Director General of the Department of Education.
- All formal complaints lodged with the College are recorded in the College Complaints Register.
- Disputes and complaints, and the resolution of such, contribute to continuous learning and improvement so that the potential for similar incidents to be repeated are minimised.
- Information about a complaint should only be disclosed to those parties who have a need to know in order to investigate and resolve the complaint. All parties must maintain confidentiality.
- Lumen Christi College holds the highest expectations of confidentiality and privacy in relation to complaints lodged. In keeping with CEWA's Records Disposal Authority, the College advises:
  - Reasonable steps are taken to ensure information is stored appropriately and is protected from misuse, modification, unauthorised access, disclosure; and
  - Records required as part of an investigation, inquiry or legal process be identified, preserved and not disposed of.

## 6. Nature of Complaints

Many situations that cause concern within schools can be addressed informally and resolved swiftly through constructive and respectful conversation between the parties involved.

Similarly, most concerns do not need to be reported or escalated directly to the Principal or a Senior Leader. Instead, they can be effectively managed by other staff members at Lumen, as outlined in the [Complaint Handling Flowchart](#) (Appendix 1) and the steps below.

### INFORMAL COMPLAINTS

#### STEP 1:

- A complaint or dispute occurs, and the complainant brings their concerns directly to the person most able to address the issue. This is often a classroom teacher, homeroom teacher, colleague, line manager, HOLA or HOY
- If an informal complaint is raised with the Principal or a Senior Leader, it will be forwarded to the Lumen Christi College staff member best able to address the complaint with the intention of following Steps 1 and 2 of this procedure.
- The complainant is able to raise their complaint in a manner best suited to them via phone call, video call, email, letter, in person or via the form located on the College website.

#### STEP 2:

- An informal conversation or meeting takes place via email, phone or face-to-face between the affected parties aimed at addressing the complaint and reaching a resolution. This occurs within two working days of the complainant raising the complaint.
- **When a complaint involves a student**, staff should record a brief summary of the situation and its outcome in SEQTA under Communication Notes for the relevant student(s). Professional judgment should be used to determine whether the complaint warrants documentation in SEQTA or inclusion in the Complaints Register. Many minor complaints are easily resolved and may not require a written record. Staff should also consider whether a locked or private note is more appropriate to safeguard the privacy of colleagues.
- For **significant or more complex** complaints that began informally and are resolved after steps 1 and 2, the details of the situation and outcome is emailed to the Executive Assistant to the Principal for recording in the College's Complaints Register.
- If the complaint is **resolved**, the resolution process ends here.

### FORMAL COMPLAINTS

#### STEP 3:

##### Escalation of unresolved informal complaints

- If an informal complaint remains **unresolved** after Steps 1 and 2, the complaint is **elevated** to the person most able to further address the issue such as a middle leader, Deputy Principal, Business Manager, Vice Principal or the Principal.

##### Initiation of formal complaints

- More serious complaints and formal complaints commence at this step and are directed to the most appropriate middle or senior leader.

- The complainant is able to raise their complaint in a manner best suited to them via phone call, video call, email, letter, in person or via the form located on the College website.
  - College email: [lumen@lumen.cewa.edu.au](mailto:lumen@lumen.cewa.edu.au)
  - College phone: 9394 9330
  - PO Box 223, Gosnells, WA 6990
  - Paper-based form (located at Student Services and College Reception)
  - Online form found under 'Feedback & Complaints' on the Policies page of the College website.

#### STEP 4:

- Upon receiving the complaint, the middle or senior leader will:
  - Acknowledge receipt of the complaint within two working days.
  - In doing so, the middle or senior leader will outline the steps to be taken in addressing the complaint to all parties involved, including a target resolution timeframe.
  - Ensure all parties involved in the complaint are supported e.g. providing access to interpreter services for those whom English is not their first language.
  - Ensure the complaint is duly investigated and assistance from CEWA sought, if necessary. The investigation may involve:
    - Providing an opportunity for the complainant to fully communicate the complaint in detail.
    - Where a complaint is about the conduct of a staff member, providing details of the complaint to the staff member and seeking their response.
    - Accessing any other relevant information in relation to the complaint.

#### STEP 5:

- At the conclusion of the investigation, the Principal or Principal's delegate makes a determination about the outcome of the complaint and shares this decision, in writing, including reasons for the determination, with all parties involved.
- If the complainant believes that the concern has been suitably addressed and **resolved**, the details of the situation are conveyed to the Executive Assistant to the Principal for recording in the college's Complaints Register. **The resolution process ends here.**

#### STEP 6:

- If the complainant does not accept the written response, the matter will be reviewed internally by the Principal (or Principal's delegate) who may seek additional information or submissions from the relevant parties. The Principal (or Principal's delegate) will seek to resolve all disputes within 15 working days from the date the review process is initiated. Should a resolution not be achieved within the specified timeframe, the complainant will be advised of the proposed course of action moving forward.
- If at the conclusion of this review process, the complainant believes the complaint remains **unresolved**, the complainant is encouraged to contact the following to ensure the complaint is suitably escalated:
  - The College Principal, if he or she has not thus far been involved in the complaint
  - The School Improvement Advisor for the college via [Make a Complaint - CEWA](#)
  - In writing to the Executive Director of Catholic Education Western Australia (CEWA) Ltd at PO Box 198, Leederville WA 6907
- Where a dispute or complaint is about the Principal, and there is no likelihood that it can be resolved with the Principal, the immediate parties may refer the dispute or complaint to the Executive Director CEWA.

## The Role of the Director General

The Director General (Department of Education) is responsible for ensuring that the College observes the Registration Standards, including the standard regarding its Complaints Handling System. Any student, staff member, parent/caregiver or community member is able to contact the Director General with concerns about how the College has dealt with a complaint. Information regarding this process is available on the [Department of Education website](#).

While the Director General may consider whether the College has breached the Registration Standards, they do not have the authority to intervene in a complaint or override the decision of the College.

## 7. Roles and Responsibilities of Staff

### Staff members:

#### Acknowledging and managing complaints promptly

- All staff are authorised to deal with informal complaints as outlined in Steps 1 and 2.
- Upon being made aware of a complaint, they must acknowledge receipt and initiate a conversation aimed at addressing and resolving the complaint within two working days.
- They may seek guidance or support from a more senior staff member when addressing the complaint.

#### Ensuring procedural fairness

- Staff must uphold principles of procedural fairness throughout the complaint process, ensuring all parties are treated respectfully and impartially, offering support where appropriate.

#### Reporting and record-keeping

- Staff are to record the details and resolution of informal complaints relating to students in SEQTA via the Communication Notes category. Professional judgment should be used to determine whether the complaint warrants documentation. Many minor complaints are easily resolved and may not require a written record. Staff should also consider whether a locked or private note is more appropriate to safeguard the privacy of colleagues.
- If staff have managed a more serious or complex complaint to its successful resolution, they should forward the details of that complaint to the Executive Assistant to the Principal for recording in the College Complaints Register.

#### Escalating complaints

- Where an informal complaint cannot be resolved by the staff member, they are to escalate the complaint or advise the complainant to lodge a formal complaint with the College as per Step 3 of this procedure.

### Middle and Senior Leaders:

**In addition to the points listed above, middle and senior leaders are responsible for:**

#### Receiving and managing escalated complaints

- Middle and senior leaders are responsible for handling complaints that have been escalated from informal resolution attempts (Steps 1 and 2) or those that are serious enough to begin at the formal stage (Step 3).

#### Acknowledging complaints promptly

- Upon receiving a formal complaint, they must acknowledge receipt of the complaint within two working days and communicate the steps to be taken, including a target timeframe for resolution.

#### Ensuring procedural fairness

- They must uphold principles of procedural fairness throughout the complaint process, ensuring all parties are treated respectfully and impartially, offering support where appropriate.

#### Conducting investigations

- Middle and senior leaders investigate complaints thoroughly. This includes:
  - Allowing the complainant to fully articulate their concerns.
  - Informing the respondent (e.g. staff member) of the complaint, seeking their response.
  - Accessing relevant information to inform the investigation.
  - Sharing the outcome of the investigation process with all parties.

#### Liaising with line managers and/or CEWA if necessary

- They may seek guidance or support from a more senior staff member and/or Catholic Education Western Australia (CEWA) during the investigation process.

#### Reporting and record-keeping

- Once a formal complaint is resolved, they ensure that the outcome is documented and forwarded to the Executive Assistant to the Principal for entry into the College's Complaints Register.

### Principal:

#### In addition to the points listed above, the principal is responsible for:

##### Developing and communicating details about the procedure

- The Principal is accountable for ensuring that appropriate and relevant procedures are developed, implemented and reviewed on a regular basis and relevant reporting is completed.
- The Principal is responsible for ensuring that all staff are informed about the College's Complaints Handling Procedures and that they understand the requirement to maintain accurate records regarding a complaint or dispute.

##### Reporting and record-keeping

- The Principal (or Principal's delegate) is authorised to record, investigate and manage complaints. They are required to maintain accurate records in the College Complaints Register and liaise with parties to a dispute or complaint.
- The Principal must regularly analyse the complaints register and SEQTA complaints records in order to inform continuous learning and improvement.
- The Principal must notify the Executive Director of a complaint for recording on the CEWA Complaints Register.

##### Reviewing and investigating unresolved complaints

- If a complainant is dissatisfied with the outcome, the Principal or their delegate (often a senior leader) will conduct an internal review and seek resolution within 15 working days.

##### Upholding external directives

- The Principal and Deputy Executive Director must suspend this process if notified by a law enforcement or external agency (other than the Department of Education) that all or part of the complaint is the subject of their inquiry, and resume when that agency authorises it.
- Principal and Deputy Executive Director must suspend this process if continuing may put at risk the safety and wellbeing of a student, and resume when it is safe to do so.

## 8. Student Complaints

Students are encouraged to raise concerns or complaints in the following ways:

- Talk to a trusted staff member who will support them through Steps 1 and 2 of this procedure and resolve the issue through discussion.
- If the complaint remains unresolved or is of a more serious or complex nature, the student can:
  - Email their concerns to the relevant Head of Year, Head of Learning or Deputy Principal
  - Email [lumen@lumen.cewa.edu.au](mailto:lumen@lumen.cewa.edu.au) and outline their complaint which will be forwarded to the Executive Assistant to the Principal who will instigate Step 3 of this procedure
  - Lodge a complaint via the MS form on the College website which will be triaged by the Executive Assistant to the Principal, instigating Step 3 of this procedure.

## 9. Child-Safety Related Complaints

Aligned with the Child Safe Framework, child safety related complaints will be addressed according to CEWA Child Protection Procedures for investigating, reporting and recording complaints, including liaison with external agencies such as WA Police and the Department of Communities.

College staff appreciate their responsibilities regarding all forms of child abuse, whether sexual, physical, emotional or psychological. When handling complaints, the wellbeing of the child or young adult is the priority, and it is important that confidentiality is maintained.

Child safety related complaints include, but are not limited to, complaints about, or allegations of:

- child abuse, grooming or other harm of a current/former student by a current/former staff member, current/former students or other people on College premises or at College events.
- ‘Reportable Conduct’ as defined in the Parliamentary Commissioner Act 1971 (WA).
- breaches of the College Code of Conduct relating to inappropriate conduct toward students.
- other child safety related staff misconduct.

## 10. Code of Conduct

All parties involved in the complaints process are expected to engage respectfully and in accordance with the College’s Code of Conduct. This includes maintaining a courteous tone, using appropriate language, and refraining from any form of rudeness, aggression, or personal attacks. Disrespectful behaviour towards College staff or any other party will not be tolerated and may result in the suspension of the complaint process or referral to further disciplinary or legal procedures. Upholding a respectful and constructive environment is essential to ensuring a fair and effective resolution process.

## 11. Review

Review of this procedure will take place on a 2-year cycle and recorded in the Procedure Review spreadsheet. In addition, after every 10 complaints, the ELT will analyse the Complaints Register to identify causes and/or systemic failures in order to inform improvement. Relevant findings from these analyses will be communicated to the various stakeholders in the appropriate forums.

Authorised by:	Peter Sackett	Signature:	
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