



The Scots College

Sydney Australia

3.6.2 Complaints Handling and Appeals Policy

Source of Obligation

The NSW Registration Manual (3.6.2) requires the College to have in place and implement policies and procedures in relation to complaints or grievances, with specific reference to processes for raising and responding to matters of concern identified by students and/or parents/guardians.

Our Policy

The Scots College has a comprehensive Complaints Handling Program that ensures parents/guardians and other external complainants can raise matters of concern, lodge complaints and have them dealt with and responded to fairly and efficiently.

The Complaints and Disputes Handling Program is based on the principles set out in the International Standard ISO 10002:2014 and AS/NZS 10002:2014.

It is the College's policy that if a formal complaint is not resolved to the satisfaction of the complainant, it may, at the request of the complainant, be escalated to an internal Appeals Panel.

3.6.2 Complaints Handling Policy Procedures

1. The Definition of 'Complaint'

A complaint is:

"An expression of dissatisfaction made to The Scots College, related to its services or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected."

The term 'complaint' is used to refer collectively to any inquiry, comment, complaint or dispute raised by a person expressing dissatisfaction as to a particular circumstance, or situation, related to our services or operations.

A complaint can sometimes be difficult to distinguish from other communications such as critical feedback and queries. A complaint should be recorded and actioned where it relates to alleged failures in service delivery or operations, or inappropriate or unprofessional behaviour.





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2. Complaints Management Principles

When managing a complaint or an appeal, the College will seek to:

- provide information to the College community about how and where to complain and to make the complaints management process as simple and accessible as possible
- keep complainants informed as to the progress of their complaint and ensure that complaints are resolved as quickly as possible
- thoroughly investigate complaints and aim to understand the complaint from the complainant's point of view
- make sure all complaints are addressed, on its merits, in an equitable, impartial, objective and unbiased manner
- keep complaints confidential and ensure that personal identifiable information about complainants and about any person that is the subject of the complaints is only available for the purpose of addressing the complaint
- ensure staff members receiving complaints do not discuss these with other students or staff other than with the assigned Complaints Manager
- keep records of complaints and the information collected in the complaints handling process.

3. How The School Handles Complaints

Dealing with 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 the College's service or operations (and hence falls within the definition of a complaint), where a resolution can be quickly and easily achieved, usually through verbal communications.

Verbal Complaints

Staff members receiving a verbal complaint should listen to and acknowledge the complainants feelings, empathise without agreeing with the complainant and outline to the complainant the complaints handling process, record the complaint online using The Scots College Complaint Handling Report Form. The College's online complaints management system, CompliSpace Assurance, has been configured to automatically assign the complaint to the appropriate Complaints Manager, depending on the nature of the complaint being raised. The staff member should advise the complainant that the Complaints Manager will make contact.

Written Complaints





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All written complaints received by staff members must be logged online using The Scots College Complaint Handling Report Form and advise the complainant that the matter will be assigned to a Complaints Manager who will make contact.

Complaints regarding the Principal or the complaints handling process should be referred to the Chairman of the College Council at chairman@tsc.nsw.edu.au.

4. Key Steps in the School Complaints Handling Process

Complaints must be addressed promptly in accordance with their nature and level of urgency. In all cases, the College must aim to acknowledge receipt of a complaint, or dispute, immediately and seek to resolve all complaints internally within our predetermined timeframes for resolution of complaints.

Step 1 – Receiving and Logging Complaints

All complaints received (whether verbally or in writing), must be recorded and logged through The Scots College Complaint Handling Report Form. The College uses the CompliSpace Assurance system to log and manage its Complaints Register.

Complaints regarding the Principal or the complaints handling process should be referred to the Chairman of the College Council at chairman@tsc.nsw.edu.au.

Step 2 – Acknowledgement of the Complaint

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 assigned Complaints Manager must send a written acknowledgement of the complaint to the complainant as soon as possible.

Step 3 – Establishing the Facts and Communicating with the Complainant

Once a complaint has been logged in the system, the assigned Complaints Manager is required to conduct an internal investigation.

Step 4 – Making a Determination

After considering all the facts available, the assigned Complaints Manager must make a determination which addresses all aspects of the complaint.





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Step 5 – Formulation of Proposed Resolution

The extent of any remedy will depend upon the nature of the complaint. Some complaints are administrative in nature and the remedy may be to rectify the administrative error and issue a verbal apology or acknowledgement to the complainant. Other remedies are more complex and may involve financial compensation. School insurance notification obligations should be considered.

Step 6 – Presenting A Final Response

Notwithstanding the outcome of the investigation or subsequent determination, the complaint must be advised of the same in writing.

Step 7 – Escalation of Complaint: Appeals Process

If the College is unable to resolve the matter, or any offer of a remedy or redress is rejected, the complainant should be advised in writing of the internal complaints and appeals process available to them and any costs involved in such processes which are either minimal or at no cost.

An Appeals Panel will be assembled as needed, and will be made up of a minimum of three members who have the requisite independence from the issue at hand to address the appeal on its merits, in a professional, fair and transparent manner. Staff who hold the following positions are eligible to sit on the Appeals Panel:

- the Principal
- Deputy Principal
- Heads of Campus
- Director of Boarding
- Year Group Coordinators
- Director of Business and Operations.

The composition of the Appeals Panel will be determined by the Principal on a case-by-case basis, depending on availability and the nature and complexity of the complaint to be considered. The Principal has the discretion to assign an external person to the College to assist with the appeals process.

If the matter remains unresolved after the appeals process, the person making the complaint may pursue external dispute resolution alternatives.





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There is no avenue of appeal to the School Council (except where a complaint is in relation to the Principal).

Step 8 – Complaints Register

The College's online complaints management system, CompliSpace Assurance, is designed to capture the key data with respect to any individual complaint and to track the resolution process. The system automatically creates a Complaints Register that provides a summary of key data about all complaints in the system at any particular point in time.

Step 9 – Rectification and Risk Management

The College will consider the circumstances that led to a complaint arising and consider whether or not there exists an opportunity to improve internal systems and procedures, so as to reduce the risk of such a complaint occurring again in the future.

Step 10 – Closure

The complaint will be closed on our online complaints management system 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 where appropriate, the risk has been included on our risk register
- any recommendations with respect to rectification work have been recorded.

5. Timeframes for Managing Complaints Internally

Timeliness in responding to complaints is a key element of successful complaints handling.

Immediate Acknowledgement of Complaint

The College should immediately acknowledge the receipt of complaints and address them promptly in accordance with their degree of urgency and in any event within three working days.





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Target Resolution Timeframe

The College aims to resolve all complaints within 20 working days. If a resolution is not achievable within 20 days, the complainant will be provided with an update on the status of their complaint. It is the responsibility of the assigned Complaints Manager to work within these timeframes.

Complaints received during, or close to, school holiday periods may take longer to resolve, depending upon the availability of relevant members of staff. An extended timeframe may be required for more complex issues.

Appeals Process

Where the matter is escalated to an Appeals Panel, the Panel aims to resolve the complaint within 28 days from the date of referral and, in any event, no later than 42 days after the original complaint was received. The College will then provide a written response to the person making the complaint. The matter will be closed if the response of the Appeals Panel is accepted.

6. Overseas Students External Appeals Process

There are specific appeals procedures which apply to overseas students. If an overseas student is not successful in the College internal appeals process, the College must advise the overseas student within ten working days of concluding the internal review of the overseas student's right to access an external complaints handling and appeals process at minimal or no cost.

Refer to the *Overseas Students Complaints Handling and Appeals Policy* for further information.

7. Privacy Complaints

Information about the way the College manages personal information and the process for managing privacy complaints is contained in the *Privacy Policy*. However, if you are unhappy with the College's response or if you do not wish to send your complaint to the College, you are entitled to contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or other contact details on the OAIC's website www.oaic.gov.au.

