SANTA MARIA COLLEGE PERTH

Policy #G12.0

Complaints Management Policy

1. Introduction

Mercy Education Limited (**MEL**) is committed to justice, accountability and the respectful resolution of concerns arising from complaints.

In responding to complaints, all who are associated with MEL are expected to act with compassion, respect and courage, consistent with the Mercy tradition and MEL's values. Effective complaints handling supports fair outcomes, helps prevent the escalation of conflict, and contributes to safe, transparent and accountable learning environments for students, families, staff and communities.

2. Purpose

This Policy establishes minimum standards for complaints handling across MEL and sets governance requirements and escalation pathways.

MEL operates a tiered complaints framework:

1. Colleges are responsible for managing complaints in the first instance under their local management policies, consistent with this Policy
2. Mercy Education Limited National Office (**MENO**) manages Escalated Complaints and provides system-level oversight, minimum standards and escalation pathways for complaints that cannot be resolved at College level or involve elevated risk

This Policy aims to ensure that MEL and its Colleges manage and respond to complaints in a way that:

- promotes the health, safety and wellbeing of students;
- ensures consistent and procedurally fair complaint management;
- improves the outcomes of complaints with a focus on collaboration and resolution; and
- meets its legal and regulatory obligations.

3. Policy Application

This Policy applies to MEL, including but not limited to, all MEL Board members, employees, contractors, consultants, volunteers, students and parents/guardians/carers and applies to formal complaints about MEL Colleges, the conduct of staff, students or community members and decisions, actions or services connected to MEL Colleges, subject to the below exclusions.

In the day to day running of a school, students, parents/guardians/carers may have routine queries, concerns or areas requiring clarification. Not all of these matters will be considered complaints under this Policy, and MEL encourages its staff to work collaboratively to resolve these informally with the wellbeing of the student being a paramount consideration.

This Policy does not apply to matters where a specific legislative or policy / procedural framework applies, such as, employee misconduct and employment matters, student critical incidents, criminal matters, child safeguarding matters or whistleblower disclosures. These matters must be managed under the relevant MEL policies and applicable legislation.

Where a matter overlaps with this Policy and another policy, MEL will determine the appropriate process or processes to be applied, having regard to legal obligations and procedural fairness.

Please see below details for further information regarding the process for specific matters.

Staff Misconduct
Allegations of misconduct or serious misconduct by staff or volunteers must be managed in accordance with applicable employment frameworks and regulatory obligations.

Complaints should ordinarily be reported to the Principal of the relevant MEL College, unless the allegation involves the Principal or is of a serious nature requiring immediate escalation to the Chief Executive Officer, or a member of the MENO Executive Team.

A complaint must be treated as an Escalated Complaint and referred to MENO where it involves:

- the Principal
- serious misconduct or reportable conduct
- risk to student safety or wellbeing
- potential legal or regulatory exposure

Where allegations may constitute criminal conduct, they must be reported to the appropriate authorities in accordance with legal obligations.

Complaints about teachers may also be referred to the relevant State regulatory authority.

This section does not limit mandatory reporting and reportable conduct obligations or the escalation requirements under this Policy.

Child Safety
Complaints, concerns, or reports that are of a child safeguarding nature, including, but not limited to, suspected or alleged Child Abuse, must be addressed in accordance with the associated MEL Child Safety and Wellbeing Policy and associated policies and procedures, relevant child safety legislation and reporting obligations.

Criminal Conduct
Allegations of criminal conduct must be reported to the appropriate authorities in accordance with legal obligations.

Whistleblower Disclosable Matters
Whistleblower Disclosable Matters must be addressed in accordance with legislation and the MEL Whistleblower Policy.

Critical Incidents
Critical Incidents must be addressed in accordance with legislation and the MEL Critical Incident Management Plan Policy, and reported to the appropriate authorities.

4. Principles

MEL's approach to complaints management is guided by the following principles and is developed with reference to the Australian Standard AS/NZA 10002:2022 (Guidelines for Complaints Management in Organisations)

Alignment with our Mission, Values and Catholic tradition
MEL is led by the teachings of Jesus Christ and the vision of Catherine McAuley, and is united by the Mercy charism. The way in which complaints are received, assessed and resolved must reflect this mission. Complaints management is not merely an administrative process, but an expression of Mercy in action, grounded in the values of ***Compassion***, ***Justice***, ***Respect***, ***Hospitality***, ***Service*** and ***Courage***. All those involved in complaints processes are expected to act in a manner consistent with the mission, vision and values of MEL and the ministerial works of the Mercy Ministry Companions.

Respect for human dignity and voice
All people have the right to be heard and treated with dignity and respect. Complaints processes must be accessible, responsive and sensitive to the vulnerability that may arise when concerns are raised.

Justice, fairness and procedural integrity
Complaints must be managed in a manner that is fair, impartial and timely. Procedural fairness will underpin all stages of complaints handling, including clear communication, impartial decision making and

proportionate outcomes.

Compassionate and restorative approach
Where appropriate, complaints will be addressed through respectful, non adversarial and restorative approaches that promote understanding, resolution and reconciliation, rather than blame.

Safety, wellbeing and non victimisation
No person will be disadvantaged or victimised for raising a complaint in good faith. The safety and wellbeing of all parties, particularly children and young people, is paramount and will take precedence where risks or legal obligations arise.

Transparency and accountability
Complaints management processes must be transparent, appropriately documented and subject to oversight. Complaints handling supports accountability, organisational learning and continuous improvement.

Shared responsibility and subsidiarity
Complaints management is a shared responsibility across Colleges, leadership and governance. Consistent with subsidiarity, complaints should be addressed at the most appropriate level, with clear escalation pathways where required.

5. Policy Requirements

5.1 Access to complaints processes

Colleges must maintain accessible and publicly available complaints processes.

Complaints processes must be communicated in a manner that is appropriate to the needs of students, parents or carers, staff and community members, and must support the raising of concerns without fear of reprisal.

Complaints will be managed in a way that is culturally safe and sensitive to the diverse circumstances of students and their families, as well as providing support to vulnerable students and families.

5.2 Local management

Colleges are responsible for managing complaints in the first instance in accordance with their local complaints policies.

5.3 Local resolution and escalation

A complaint becomes an Escalated Complaint and must be referred to MENO where it:

- involves a Principal or MENO staff member
- involves serious misconduct or reportable conduct
- presents significant legal, safety or reputational risk
- involves systemic issues affecting more than one school
- cannot be resolved at College level

MENO will determine how the Escalated Complaint is managed, including investigation, oversight, or referral to external bodies.

Complaints concerning MENO staff below CEO level are to be escalated to the CEO.

Complaints concerning the CEO are to be referred to the MEL Board Chair.

Complaints concerning any member of the MEL Board must be escalated to the MEL Board Chair. If the complaint concerns the MEL Board Chair, the MMCL Trustee Chair must be informed.

5.4 Procedural fairness

All complaints must be managed in accordance with the principles of procedural fairness.

This includes:

- timely acknowledgment and response
- impartial and unbiased consideration of the complaint
- providing affected parties with sufficient information about the substance of the complaint to enable a meaningful response
- decisions based on relevant information and evidence
- proportionate and reasoned outcomes
- providing parties with a reasonable opportunity to respond to information that is credible, relevant and adverse to their interests

5.5 Safety, wellbeing and mandatory reporting

The safety and wellbeing of all parties, particularly children and young people, is paramount in the handling of all complaints. Where a complaint raises concerns relating to child safety, reportable conduct, criminal behaviour or other mandatory reporting obligations, associated legal obligations must be complied with immediately and override all other considerations.

5.6 Support for parties

Both the complainant and the subject of a complaint must be treated respectfully and provided with appropriate information and support throughout the complaints process. Appropriate support must be provided to all parties, having regard to vulnerability, power imbalance and cultural safety.

5.7 Conflict of Interest

Any actual, potential or perceived conflict of interest in the handling of a complaint by a person responsible for managing that complaint must be identified and disclosed as soon as practicable.

Where a conflict exists, the person must not be involved in the assessment, investigation or determination of the complaint, and an alternative appropriate decision-maker must be appointed.

Conflicts of interest must be managed in accordance with MEL's Conflict of Interest Policy.

5.8 Confidentiality and information sharing

Complaints must be handled confidentially and sensitively and in accordance with applicable privacy legislation and the MEL Privacy Policy.

Information may be disclosed where required by law or where reasonably necessary to ensure the safety and wellbeing of any person.

5.9 Anonymous or vexatious complaints

Anonymous complaints will be managed and assessed to the extent reasonably possible.

Complaints may be declined where:

- insufficient information is provided; or
- the complaint is frivolous, vexatious or malicious

Such decisions must be documented.

Notwithstanding the above, where an anonymous complaint raises a child safety concern or triggers a mandatory reporting obligation, the complaint must be referred in accordance with the MEL Child Safety and Wellbeing Policy and applicable legislation regardless of whether the complainant can be identified.

5.10 Record keeping and reporting

All complaints and their outcomes must be documented and retained in accordance with record keeping obligations, school registration standards and applicable legislation. Complaints data must be used to

support oversight, risk management, continuous improvement and compliance reporting at school and system levels.

5.11 Review and external options

Where a complainant is dissatisfied with the outcome of an Escalated Complaint, or where appropriate in the circumstances after internal processes are exhausted (College and MENO level), they may be informed of available internal review mechanisms and relevant external complaint or oversight bodies.

External options will depend on the nature and location of the complaint and may include relevant state or territory school regulators, anti-discrimination bodies, or other statutory authorities.

6. Implementation and Accessibility

The Policy will be the subject of induction and subsequent in-service refresher training.

The Policy is accessible to all people connected with MEL and the public. This includes being available on the MEL Intranet site, public website and College websites.

This Policy may be varied by MEL from time to time pursuant to the MEL Policy Review and Implementation Framework.

MMC will be informed of any amendments to this Policy and their role in the Policy as it relates to the Board Chair.

7. Failure to Comply with this Policy

Failure to comply with this Policy may result in disciplinary or other management action, up to and including dismissal or termination of a contractual arrangement.

8. Definitions

Term	Definition
Child Abuse	as defined in the MEL Child Safety and Wellbeing Policy
College	a school governed by MEL
Complaint	a formal expression of dissatisfaction with an action taken, decision made, service provided or handling of an issue, where a response or resolution is expected
Complainant	the person or persons who raise a complaint under this Policy
Critical Incidents	as defined in the MEL Critical Incident Management Plan Policy
Escalated Complaint	a complaint that must be referred to MENO due to its subject matter, risk profile, or inability to be resolved at College level
Executive Team	senior leadership team of MEL, including the Chief Executive Officer, Chief Financial Officer, Head of Education, Head of Legal, Company Secretary, Manager of Digital Design & Transformation and any other employee of MEL designated as such
GOVCOM	the Governance and Strategy Committee of the MEL Board
MEL	Mercy Education Ltd (ABN 69 154 531 870)
MENO	Mercy Education Limited National Office, located at Suite 2.02, Level 2/289 Wellington Parade S, East Melbourne VIC 3002.
MMCL	Mercy Ministry Companions is the public juridical person of pontifical right established under the Code of Canon Law of the Catholic Church – MMCL (ACN 646 217 790) is the civil body of Mercy Ministry Companions.
Policy	G12.0: Complaints Management Policy
Principal	the Principal of a MEL-governed College
Whistleblower Disclosable Matters	as defined in the MEL Whistleblower Policy

9. Related Documents

This Policy should be read in conjunction with the following MEL documents:
Delegations of Authority Policy
Complaints Handling Flow Chart
Complaints Management Procedure
Operational Instructions – Complaints Management
Policy and Implementation Framework
Conflict of Interest Policy
Whistleblower Policy
Privacy Policy
Sexual Harassment Policy
Workplace Health, Safety and Wellbeing Policy
Critical Incident Management Plan Policy
Child Safety and Wellbeing Policy
Code of Conduct - Employees & Volunteers
Code of Conduct - Suppliers
Code of Conduct - Parents

10. Policy Review History

This is the fourth version of this Policy. The Policy was prepared in consultation with the MEL Executive Team before being presented to the Governance and Strategy Committee (**GOVCOM**) of the MEL Board for recommendation to the Board.

This Policy is in alignment with the new MEL Policy and Implementation Framework developed in early 2026.

This Policy will be reviewed in accordance with the MEL Policy and Implementation Framework, at least every three years, or earlier if required to:

1. ensure that it remains current with respect to legal and regulatory requirements; m
2. ensure complaints are appropriately recorded, investigated and responded to;
3. ensure that it operates effectively; and
4. confirm whether any changes are required.

Any amendments to this Policy must be done in consultation with the MEL Executive Team, endorsed by GOVCOM and approved by the MEL Board.

Version	Approval Date	Next Review	Subject Matter Expert	Exec Team Sponsor	Approver
1.0	Nov 2015	Jan 2020		MEL Executive	MEL Board
2.0	May 2020	Jan 2023		Chief Executive Officer	MEL Board
3.0	Feb 2023	Feb 2026		Chief Executive Officer	MEL Board
4.0	Aug 2026	Aug 2029	Head of Legal	Head of Legal/Head of Education	MEL Board