# Reports and Resolution (Complaints Handling) Policy

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| **Purpose:** | The purpose of this policy is to:<br>(a) provide written processes about receiving, assessing, investigating and otherwise dealing with serious reports. | |
| **Scope:** | This policy applies to:<br>• Any person making or directly affected by the subject of a report associated with Montessori International College. Examples may include staff, students or a student's parent or guardian, contractors, or community members. | |
| **Status:** | ☐ In review<br>☑ Approved | **Supersedes**: Complaints Handling Process V2 |
| **Authorised by:** | School Governing Body | **Date of Authorisation**: 23/02/26 |
| **References:** | • *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)*<br>• *Fair Work Act 2009 (Cth)*<br>• *Work Health and Safety Act 2011 (Qld)*<br>• *Privacy Act 1988 (Cth)*<br>• *Anti-Discrimination Act 1991 (Qld)*<br>• *Australian Human Rights Commission Act 1986 (Cth)*<br>• *Sex Discrimination Act 1984 (Cth)*<br>• *Age Discrimination Act 2004 (Cth)*<br>• *Disability Discrimination Act 1992 (Cth)*<br>• *Racial Discrimination Act 1975 (Cth)*<br>• *Queensland Ombudsman – Complaint Management Guidance*<br>• *Standards Australia – AS 10002:2022 Guidelines for complaint management in organisations*<br>• *Australian Charities and Not-for-profits Commission (ACNC) Governance Standards*<br>• Child Protection Policy<br>• Anti Discrimination Policy<br>• Privacy Policy<br>• Staff Code of Conduct<br>• Positive Behaviour Policy<br>• College Constitution<br>• Board Director Discipline Policy | |
| **Review Date:** | Biennially | **Next Review Date**: March 2028 |
| **Policy Owner:** | School Governing Body | |

**POLICY STATEMENT:**

Montessori International College (MIC) acknowledges the right of students, parents/guardians, staff and others to make a serious report when dissatisfied with College services, including an action, inaction or decision of the College. The College encourages constructive criticism, feedback and complaints. MIC is committed to ensuring that reports received are handled in a responsive, efficient, consistent, effective, transparent and fair way.

MIC will ensure staff members can recognise, receive and appropriately refer reports to the informal or formal reports and resolution procedure.

MIC recognises that time spent on handling reports can be an investment in better service to students and parents/guardians and a better culture for staff members, and views reports as part of an important feedback and accountability process.

MIC's reports handling framework is developed in accordance with section *16(2)(a) of the Education (Accreditation of Non-State Schools) Regulation 2017 (Qld),* which requires non-state schools to have written processes for receiving, assessing, investigating and otherwise dealing with reports of a specific nature.

The College also aligns its report management practices with AS 10002:2022 Guidelines for complaint management in organisations, promoting accessibility, fairness, responsiveness and continuous improvement.

As a registered charity, MIC is committed to transparent and accountable reports handling consistent with the *ACNC Governance Standards*, particularly *Governance Standard 2 (accountability to members)* and *Governance Standard 5 (duties of responsible persons).*

**DEFINITIONS:**

***Report or Disclosure:*** An expression of dissatisfaction made to or about the College, related to the College services, staff or the handling of a report, where a response or resolution is explicitly or implicitly expected or legally required.

***Informal Report or Disclosure*:** A report about a matter that is likely to be simple, straight forward, easily manageable, or minor, where a simple or quick resolution is appropriate such as discussion of the matter with a relevant staff member.

***Formal Report or Disclosure:*** A report about a matter that is serious, complex or may pose a threat to the health and safety of any person. Examples include serious allegations or breaches of policy, reports against a senior staff member, including the Principal or an informal report that could not be resolved informally. Assessment of the report is required by the Principal, Executive or Board as appropriate.

***Reporter or Person Making a Disclosure:*** The person, organisation or their representative making a report.

***Respondent***: The person who is referred to in a report by a reporter or person making a disclosure as the person responsible for their concerns or who can best respond to their concern**.**

**REPORTS HANDLING PRINCIPLES:**

MIC will manage reports according to the following (which include principles of procedural fairness):

- Reports will be taken seriously, dealt with fairly and objectively, without judgement and addressed in a reasonable timeframe;
- Reports should be resolved with as little formality and disruption as possible, having regard to the nature of the report;
- Interested parties to the report (for example, the reporter and any respondent) will be heard and/or may provide relevant information in relation to the report;
- Confidentiality and privacy will be maintained as much as possible;
- The reporter and any respondent will be offered support as appropriate;
- Victimising behaviour towards a reporter, respondent or other people associated with the report, will not be tolerated;
- Reporters that lodge a report or disclosure on reasonable grounds will not suffer any other reprisals on the basis of lodging the report.

**Accessibility and Support**
The report and resolution process will be accessible to all members of the community, including those with disability, language barriers or other vulnerabilities. Reasonable adjustments will be made where required in accordance with the *Disability Discrimination Act 1992 (Cth)*.

**Impartiality and Objectivity**
Reports will be assessed and investigated impartially, and decision-makers will avoid actual or perceived conflicts of interest.

**Continuous Improvement**
MIC will analyse reporting data periodically to identify systemic issues, trends or opportunities for service improvement.

**Protection from Reprisal**
MIC prohibits victimisation or retaliation against any person who makes a report or disclosure in good faith, consistent with anti-discrimination and workplace safety legislation.

**PROCEDURE:**

**Reports that may be resolved under this Policy**
MIC encourages anyone who feels impacted by an issue involving the College to file a report. Reports or disclosures can address matters such as:

- The College, its staff, contractors, or students having done something wrong;
- The College, its staff, contractors, or students having failed to do something they should have done;
- The College, its staff, contractors, or students having acted unfairly;
- Issues of student or staff behaviour that are contrary to their relevant behaviour management policy or Staff Code of Conduct, including inappropriate staff conduct as reported by a student;
- Issues related to learning programs, assessment and reporting of student learning;
- Issues related to communication with students or parents or between MIC staff or contractors;
- Issues related to College fees and payments;
- General administrative issues;

- Issues relating to non-compliance with a process outlined in MIC's policies or procedures, for example the Child Protection Policy, Anti Discrimination Policy, or Privacy Policy.

Student reports may be brought by students or by parents on behalf of their children, as appropriate in the circumstances.

**Issues Outside this Policy**
The following matters are outside the scope of this policy and should be managed as follows:

- Child protection concerns including allegations of sexual abuse or harm to children should be dealt with in accordance with MIC's Child Protection Policy.
- Student bullying reports should be dealt with under the MIC Student Bullying Policy.
- Student discipline matters, including matters involving suspension or expulsion, should be dealt with under the Positive Behaviour Policy.
- Student or staff member violence or criminal matters should be directed to the Principal who will involve the police as appropriate.
- Disputes between Board members should be dealt with in accordance with the Constitution and Board Director Discipline Policy.
- Disputes relating to a staff member's employment should be directed to their manager and dealt with in accordance with employment law and the contract of employment. This does not include disputes about work health and safety matters, which may be dealt with under the College's Report & Resolution Policy.
- Formal legal proceedings should be managed as appropriate in the circumstances.
- Reports relating to the education and training services provided by MIC to an overseas student should be dealt with in accordance with the *Education Services for Overseas Students Act 2000* and *National Code*.

**Responsibilities**

***College Governing Body***
MIC is responsible for:

- Approving and reviewing this Policy in accordance with regulatory requirements;
- Ensuring the College maintains compliant written reports handling processes in accordance with the *Education (Accreditation of Non-State Schools) Regulation 2017 (Qld);*
- Receiving and overseeing reports involving the Principal;
- Monitoring de-identified report data, trends and systemic risks; and
- Ensuring appropriate governance oversight of report management and resolution.

***Principal***
The Principal is responsible for:

- Implementing and administering this Policy;
- Ensuring reports are managed in a timely, fair and procedurally sound manner;
- Determining or providing advice on whether reports are managed informally or formally;
- Escalating significant or high-risk matters to the Board or an external investigator where required;
- Ensuring appropriate support is provided to reporters or people making a disclosure and respondents;
- Ensuring compliance with privacy, child protection and workplace legislation; and

- Reporting to the Board on reporting trends and systemic issues.

***Executive and Senior Leaders***
Executive and Senior Leaders are responsible for:

- Receiving and managing reports in accordance with this Policy;
- Maintaining accurate and confidential reporting records;
- Escalating reports that are serious, complex, high-risk or unresolved;
- Supporting early resolution at the individual or team level where appropriate; and
- Ensuring staff and contractors are informed of their responsibilities under this Policy.

***Staff Members***
All staff are responsible for:

- Acting in accordance with this Policy;
- Treating reporters and respondents respectfully and impartially;
- Maintaining confidentiality;
- Promptly referring reports or disclosures that cannot be resolved locally; and
- Avoiding victimisation or retaliatory behaviour.

***Reporters and Respondents***
All parties to a report are expected to:

- Act in good faith;
- Provide accurate and complete information;
- Treat all parties respectfully;
- Maintain confidentiality; and
- Participate constructively in the resolution process.

**All Parties to a Dispute**
The reporter and respondent both have the following role and responsibilities:

- Not provide deliberately false or misleading information;
- Not make frivolous or vexatious reports or retaliatory complaints;
- Act in good faith, and maintain a mutually beneficial relationship of trust and cooperation;
- Act in a calm, courteous and non-threatening manner;
- Acknowledge that a common goal is to achieve an outcome acceptable to all parties;
- Recognise that all parties have rights and responsibilities which must be balanced;
- Maintain and respect the privacy and confidentiality of all parties; and
- Not victimise or act in reprisal against any party to the dispute or any person associated with them.

**MIC Staff Receiving and/or Managing Reports**
MIC Staff receiving and/or managing reports have the following role and responsibilities:

- Act in accordance with MIC's Reports & Resolution Policy;
- Refer the reporter or person making a disclosure to MIC's Report & Resolution Policy and provide additional information as necessary;
- Maintain confidentiality as far as possible;
- Keep appropriate records;

- Forward reports to more senior staff members, including the Principal, if the report cannot be resolved at the initial level or if it involves serious issues that require the involvement of more senior staff; and
- Not victimise or act in reprisal against the reporter, respondent or any person associated with them.

## REPORT RESOLUTION PROCESS

### 1. Lodging a Report

a) Reports can be lodged with the most appropriate staff member at the site of the concern, for example, the initial contact point for many reports is the student's relevant Classroom Guide. Reports can be lodged through various methods, including:
   i. Phone
   ii. Email
   iii. In-person (by appointment)

b) Reports about the Principal must be lodged with the Board (board.chair@mic.qld.edu.au)

c) If the reporter is unsure where to direct their report or disclosure, they can contact College Administration (admin@mic.qld.edu.au) for guidance.

d) If the reporter is uncomfortable directing the report to the most appropriate member at the site of the concern, or wants to make a formal report, they can submit a report by phone, email, or in-person (by appointment).

e) Where an anonymous report is lodged, MIC will follow this Policy, when there is sufficient information to do so.

### 2. Acknowledgement, Assessment and Referral

a) The Principal or member of the Executive upon receipt of the report will:
   - Acknowledge the report within two (2) business days, outlining the next steps and where possible the estimated timeframes; and
   - Assess the report, using the definitions of informal and formal reports in this policy, and refer the reporter to the informal or formal reporting process.

### 3. Registration and Support

a) The recipient of the report will promptly enter it onto the formal reports register regardless of whether it proceeds through the informal or formal process.

b) The recipient of the report will offer procedural support to the reporter as appropriate, which may include assistance with completing forms or understanding procedures, or the College's Employee Assistance Program (TELUS Health).

c) If a student is a reporter, respondent or victim, or the child of a reporter, respondent or victim of a matter being managed through this Policy, MIC may offer the student support where appropriate (e.g., discussing suitable adjustments with parents/guardians).

### 4. Informal Reports Handling Process

a) The informal process is designed to resolve issues promptly and collaboratively at the immediate level (i.e., the site of the concern).

b) It may involve constructive discussion and negotiation between the reporter and the relevant staff member(s).

c) If the report cannot be resolved informally, it will be escalated to the formal process.

**5. Formal Reports Handling Process**

- The formal process begins with the assessment of the report by a designated staff member (e.g., a member of the senior leadership team or the Board Chairperson for reports against the Principal).
- The staff member may gather additional information through investigation, interviews, or evidence review.
- The staff member will determine appropriate action, which may include:
    - Mediation
    - Disciplinary measures in alignment with relevant Policy or regulation
    - Implementation of Policy changes
    - Referral to external agencies (e.g., police)
    - Provision of written updates to the reporter throughout the process
    - Other actions the Principal or Board Chairperson determines as appropriate in the circumstances

**6. Report Closure**

a) The report register will be updated with the date the report is closed and a brief summary of the outcome.
b) The reporter will receive written notification of the outcome and any actions taken where appropriate.

**7. Appeals Process**

a) Reporters or persons making a disclosure may appeal the outcome of a report by writing to:
    i. The Principal (for reports not previously managed by the Principal)
    ii. The Board Chairperson (for reports previously managed by the Principal or reports about the Principal) or for reports already handled and resolved by the full Board.

**Record Management and Reporting**

Report information will be collected, stored and handled in accordance with the *Privacy Act 1988 (Cth)* and MIC's Privacy Policy. Access to report records will be restricted to authorised staff members only and retained in accordance with record-keeping requirements.

Personal information will only be disclosed where required by law, for procedural fairness, or where necessary to resolve the report.

MIC is committed to raising awareness of the process for resolving reports at the College, including by the development and implementation of this Policy and related procedures, and via the clear support and promotion of the Policy and procedures.

MIC is also committed to appropriately training all staff on how to resolve reports in line with this policy and the related procedures.

MIC will maintain a formal report register with details such as the date, source and description of reports, the staff member managing the report, the actions taken, outcome and the date the report was closed.

The report register will be stored securely and electronically.

All reports shall be entered onto the report register as soon as practicable after the report is received. The report register will not contain reports about the Principal. Records of reports about the Principal will be maintained by the Board with access restricted to the Board.

To safeguard confidentiality and maintain the integrity of the reporting process, access to the entire report register will be limited to the Executive.

The Principal may authorise the sharing of specific, relevant entries from the report register with other designated staff members (such as the senior leadership team), provided measures are taken to protect the confidentiality of all parties involved, particularly ensuring that respondents to a report do not gain inappropriate access to information about the allegations against them.

**Managing Unreasonable or Vexatious Conduct**

While MIC encourages the raising of concerns, the College may take reasonable steps to manage reports that are frivolous, vexatious, malicious, or involve unreasonable conduct (e.g., aggressive, repetitive or abusive behaviour). Such management steps may include:

- Limiting communication to written correspondence
- Nominating a single point of contact
- Setting reasonable boundaries on communication frequency
- Refusing to engage in repetitive reports that have been fully investigated and finalised, limited to one appeal process.

Any such decision will be made proportionately and documented appropriately.