

# Catholic Schools NSW Limited External Complaints Handling Policy and Procedures

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#### Document Authorisation

Name	Signature	Date
Board	By resolution	24 March 2021
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#### Document Review Process

Name	Comment	Date
CLRO	Triennial Review	12 January 2027

#### Policy Ownership

The Chief Legal and Risk Officer is responsible for the development and update of this policy.

#### Policy Application

Policy application is subject to approval by the Chief Executive Officer.

#### Policy Location

This policy is located at <https://csnsw.policyconnect.com.au>

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## 1 Background

Catholic Schools NSW Ltd (**CSNSW**) has been established by the Bishops of NSW (**Member Bishops**) for the purposes of:

- a) acting as an overarching entity for the purpose of advancing education and religion in Catholic schools in NSW; and
- b) ensuring that systemic Catholic schools meet their compliance requirements; and
- c) measuring activities in such a way as to maximise the educational and faith outcomes of students.

These purposes are reflected in the Constitution of CSNSW and are further supported by a canonical mandate from the Member Bishops of each of the 11 Dioceses across NSW.

## 2 Context

CSNSW is committed to implementing an external complaints handling process which is fair, efficient and effective.

CSNSW aims to create a culture which is responsive and welcoming of complaints and feedback from relevant stakeholders.

An efficient and effective complaints handling process is an opportunity to learn from, and improve upon, existing systems and processes. It is also an opportunity to identify emerging issues and potential systemic issues affecting the processes and functions of CSNSW and the entities it represents.

This External Complaints Handling Policy and procedures (**this Policy**), designed in accordance with Australian/New Zealand Standard AS/NZ 10002:2014, forms part of CSNSW's risk management program.

## 3 Purpose and Objective

The purpose of this policy is to describe how CSNSW handles complaints and explain who can complain, how complaints can be made, a description of the complaint process and the avenues for review.

This policy applies to all employees receiving or managing complaints made to, or about CSNSW, regarding CSNSW's functions, services and complaint handling.

This policy does not apply to complaints from current or former CSNSW employees.

Workplace grievances, code of conduct complaints and whistleblower disclosures are dealt with through separate mechanisms (please refer to the definition of complaint in the Key terms and Definitions section). CSNSW employees should refer to the relevant policies for more information.

Complaints made about CSNSW employees under this Policy are treated seriously and dealt with in the same manner as a complaint made by an employee of CSNSW.

CSNSW's complaint management system is intended to:

- enable CSNSW to respond to issues raised by people making complaints in a timely and cost-effective way;
- boost confidence in CSNSW's processes, and

- provide information that can be used by CSNSW to deliver quality improvements in its functions, services and complaint handling.

CSNSW expects all employees to be committed to fair, effective and efficient complaint handling.

## 4 Key Terms & Definitions

Term	Definition
<b>Complaint</b>	<p><i>An expression of dissatisfaction made to CSNSW related to its functions, services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.</i></p> <p>A complaint covered by this Policy can be distinguished from:</p> <ul style="list-style-type: none"> <li>• code of conduct complaints [see <b>CSNSW’s Employee Handbook</b> regarding CSNSW Code of Conduct]</li> <li>• workplace grievances [see <b>CSNSW’s Employee Handbook</b> for further information on grievances]</li> <li>• whistleblower disclosures [see <b>CSNSW’s Whistleblowing policy</b>]</li> <li>• responses to requests for feedback about the standard of CSNSW’s services [see the definition of ‘feedback’ below] and</li> <li>• requests for information [see <b>CSNSW’s Privacy policy</b>].</li> </ul>
<b>Dispute</b>	An unresolved complaint escalated either within or outside of CSNSW.
<b>Feedback</b>	Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about our functions, services or complaint handling where a response is not explicitly or implicitly expected or legally required.
<b>Reportable Conduct</b>	Information which gives rise to a suspicion concerning: <ul style="list-style-type: none"> <li>• misconduct (which includes fraud, negligence, default, breach of trust and breach of duty) or an improper state of affairs in relation to CSNSW or a related body corporate of CSNSW (if any); or</li> <li>• misconduct, or an improper state of affairs or circumstances, in relation to the tax affairs of CSNSW or an associate of CSNSW (Tax Disclosures).</li> </ul>
<b>Workplace Grievance</b>	A clear, formal written statement by an individual employee regarding matters at work including issues relating to discrimination, harassment, bullying, work relationships and decisions at CSNSW that affect your work.

## 5 Principles for complaints handling

### 5.1 Facilitate Complaints

CSNSW is committed to seeking and receiving feedback and complaints about its functions, services, systems, practices, procedures and complaint handling.

Feedback and complaints will be managed within a reasonable time frame.

People making complaints are listened to, treated with respect by employees and actively involved in the complaint process where possible and appropriate.

People making complaints are provided with;

- information about the complaint handling process;
- multiple and accessible ways to make complaints; and
- reasons for decision/s and any options for redress or review.

CSNSW will, to the extent that it is possible, 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.

A person making a complaint may choose to remain anonymous and CSNSW will carry out an investigation of the issues raised where there is enough information provided.

Information about how and where complaints may be made to or about CSNSW will be well publicised.

CSNSW will ensure that its systems to manage complaints are easily understood and accessible.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, CSNSW 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).

There is no cost associated with making a complaint to CSNSW.

### 5.2 Respond to complaints

Wherever possible, CSNSW will strive to resolve complaints at first contact.

CSNSW will

- a) promptly acknowledge receipt of a complaint; and
- b) assess and prioritise that complaint 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.

CSNSW 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 actions,
- the progress of the complaint and reasons for any delay, and
- their likely involvement in the process.

CSNSW will advise people as soon as possible if CSNSW is unable to deal with any part of their complaint and provide advice about where those issues and/or complaints may be directed (if known and appropriate).

CSNSW will also advise people as soon as possible if CSNSW is unable to meet time frames for responding to complaints and provide a reason for the delay.

### 5.3 Objectivity and fairness

CSNSW will

- a) address each complaint with integrity and in an equitable, objective and unbiased manner; and
- b) ensure that the person handling a complaint is different from the employee against whom a complaint has been made.

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.

### 5.4 Responding flexibly

CSNSW employees are encouraged to resolve complaints promptly and with as little formality as possible. CSNSW adopts a flexible approach to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

Each complaint is assessed on its merits and involves people making complaints and/or their representative in the process as far as possible.

### 5.5 Confidentiality

To the extent that it is practical and appropriate, CSNSW protects the identity of people making complaints.

Personal information that identifies individuals is only disclosed or used by CSNSW as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

## 5.6 Manage the parties to a complaint

Where a complaint involves multiple organisations, CSNSW will work with the other organisation/s where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within CSNSW, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where CSNSW services are contracted out, CSNSW expects contracted service providers to have an accessible and comprehensive complaint management system. CSNSW accepts complaints about its service providers.

When similar complaints are made by related parties CSNSW will try to arrange to communicate with a single representative of the group.

## 5.7 Employees are authorised to handle complaints

All CSNSW employees are supported and encouraged to implement CSNSW's complaint management system within the scope and remit of their knowledge and position description.

Employees are encouraged to provide feedback on the effectiveness and efficiency of all aspects of the complaint management system.

## 5.8 Managing unreasonable conduct by people making complaints

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

- the ability to do its work and perform its functions in the most effective and efficient way possible
- the health, safety and security of employees, and
- the ability to allocate resources fairly across all the complaints CSNSW receives.

When people behave unreasonably in their dealings with CSNSW, their conduct can significantly affect the progress and efficiency of the work of the organisation. Behaviour by a current or former complainant which, because of its nature or frequency, raises substantial health, safety, resource or equity issues for the parties to a complaint will be considered by CSNSW to be unreasonable complainant conduct. In cases where unreasonable complainant conduct occurs, CSNSW will take proactive and decisive action to manage any conduct that negatively and unreasonably affects the organisation and will support our employees to do the same in accordance with this policy.



## 6 Complaint management system

Employees must act in accordance with CSNSW's complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Employees should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The key stages in CSNSW's complaints management system are set out below.

### 6.1 Receipt of complaints

Unless the complaint has been resolved at the outset, the complaint must be recorded along with its supporting information. Each complaint is assigned a unique identifier and is recorded in Complispace.

The record of the complaint includes:

- the contact information of the person making the complaint;
- issues raised by the person making the complaint and the outcome/s sought;
- any other relevant information; and
- any additional support which the person making the complaint requires.

### 6.2 Acknowledgement of complaints

Each complaint is promptly acknowledged, and preferably within 3 working days.

Consideration is given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

### 6.3 Initial assessment and addressing of complaints

After acknowledging receipt of the complaint, CSNSW will confirm whether the issue/s raised in the complaint is within the control of CSNSW. A table outlining the complaints which CSNSW can and cannot consider is included in Schedule 2 of this Policy.

CSNSW will also consider the outcome sought by the person making the 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, CSNSW 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, CSNSW will consider how to manage it and CSNSW may:

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

The person making the complaint will be provided with up to date information on the progress of the complaint, particularly if there are any delays. CSNSW will communicate the outcome of the complaint using the most appropriate medium. The actions which CSNSW decides to take will be tailored to each case and take into account any statutory requirements.

#### 6.4 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, the person making the complaint will be advised of:

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

If, during an investigation, there are any adverse findings made about an individual, CSNSW will consider any applicable privacy obligations before sharing the findings with the person making the complaint.

#### 6.5 Closing the complaint, record keeping, redress and review

CSNSW will keep comprehensive records about:

- how the complaint was managed
- 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.

CSNSW will ensure that outcomes are properly implemented, monitored and reported to the relevant person at CSNSW.

CSNSW will inform people who make complaints to or about us, of any internal or external review options available to them (including any relevant Ombudsman or oversight bodies).

## 6.6 The three levels of complaint handling

CSNSW aims to resolve complaints at the first level, the frontline. Wherever possible employees will be adequately equipped to respond to complaints, including being given appropriate authority, training and supervision.

Where this is not possible, CSNSW may decide to escalate the complaint to a more senior person within CSNSW. 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 CSNSW's review of their complaint, they may seek an external review of CSNSW's decision. This is the third level of complaint handling.

## 7 Accountability and learning

### 7.1 Analysis and evaluation of complaints

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

Quarterly reporting will be provided to the Audit and Risk Committee and include information 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 received for internal and/or external review of complaint handling.

Senior management will conduct regular analysis of the reports to monitor trends, measure the quality of CSNSW's functions and services and make improvements.

### 7.2 Monitoring of the complaint management system

CSNSW will continually monitor its complaints 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.

### 7.3 Continuous improvement

CSNSW is committed to improving the effectiveness and efficiency of its complaint management system.

To this end, CSNSW will:

- support the appropriate resolution of complaints;
- implement best practices in complaint handling;
- recognise and reward examples of good complaint handling by employees;
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of the analysis of complaints data.

## Schedule 1 – Wording for complaints handling – website and other publications

*Catholic Schools NSW is not responsible for the day to day running of Catholic Schools in NSW.*

*The Catholic Schools Office in the Diocese in which the child's school is located is responsible for the day to day running of the school.*

*Complaints that relate to a child attending a Catholic School in NSW must be referred directly to the child's school by following the procedure outlined in the school complaints policy which is located on the school website. Schools are responsible for managing complaints relating to enrolment, attendance, school fees, bullying, wellbeing and child protection.*

*CSNSW as the single registration authority may enquire as to whether a school has appropriate policies and procedures in place to meet its registration requirements. CSNSW has no ability to make determinations on issues set out above. You should direct your enquiries in respect of those matters to the school in the first instance or to the relevant Catholic Schools Office in the Diocese in which your school is located.*

*Parental complaints which have not been satisfactorily resolved by the school must be directed to the relevant Catholic Schools Office. You can find contact details of the relevant Catholic Schools Office by clicking on this [link](#).*

*A complaint is an expression of dissatisfaction made to an organisation related to its functions, services, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.*

*You can make a complaint by*

*Completing a feedback form on our website <https://www.csnsw.catholic.edu.au/>*

*Telephoning us on 1800 427 679*

*Writing to us at PO Box 20768, World Square NSW 2002*

*Emailing us at [ccsnew@csnsw.catholic.edu.au](mailto:ccsnew@csnsw.catholic.edu.au)*

*If we receive your complaint verbally and we consider it appropriate, we may ask you to put your complaint in writing.*

*When we are investigating your complaint, we will be relying on information provided by you. In some circumstances, we may also hold some information in relation to your complaint. We may need to contact you to clarify details or request additional information where necessary. To help us investigate your complaint quickly and efficiently we will ask you for the following information:*

- Your name and contact details;*
- The name of the person you have been dealing with regarding the subject of your complaint;*

- *The nature of the complaint;*
- *Details of any steps you have taken to resolve your complaint;*
- *Details of conversations you may have had with us that may be relevant to your complaint;*
- *Copies of any documentation which supports your complaint.*

*You may also make a complaint anonymously. This may delay the resolution of your complaint or the extent to which we are able to investigate.*

*The person receiving or managing your complaint will provide you with any assistance you may need to make your complaint.*

*When taking a complaint, we will record your name and contact details. We will also record all details of your complaint including the facts and the cause/s of your complaint, the outcome and any actions taken following the investigation of your complaint. We will also record all dates and times relating to actions taken to resolve the complaint and communications between us.*

*As part of our on-going improvement plan, complaints will be monitored for any identifying trends and rectification/remedial action taken to mitigate any identified issues.*

*If you lodge a complaint, we will record your personal information solely for the purposes of addressing your complaint. If you require further information on how we manage your personal information please refer to our [Privacy Policy](#).*

*Catholic Schools NSW is committed to resolving your issues at the first point of contact; however, this will not be possible in all circumstances, in which case a more formal complaints process will be followed.*

*We will acknowledge receipt of your complaint within three (3) business days. Once your complaint has been received, we will undertake an initial review of your complaint.*

*There may be circumstances during the initial review or investigation of your complaint where we may need to clarify certain aspects of your complaint or request additional documentation from you. In such circumstances, we will explain the purpose of seeking clarification or additional documentation and provide you with feedback on the status of your complaint at that time.*

*We are committed to resolving your complaint within 10 business days of you lodging your complaint, however, this may not always be possible on every occasion. Where we have been unable to resolve your complaint within 10 business days, we will inform you of the reason for the delay and specify a date when we will be able to finalise your complaint.*

*During the initial review or investigation stage, we may need to seek further clarification or documentation from you to assist us in resolving your complaint. If we are waiting on you to provide this information, we may not be able to meet our 10-business day finalisation commitment. Upon receipt of your clarification or additional documentation we will indicate to you when we expect to be able to finalise your complaint.*

*Once we have finalised your complaint, we will advise you of our findings and any action we have taken. We will do this in writing, unless it has been mutually agreed that we can provide it to you verbally. You have the right to make enquiries about the current status of your complaint at any time by contacting us.*

Schedule 2 – Complaints to CSNSW

EXAMPLES OF THE TYPES OF COMPLAINTS TO BE MADE TO CSNSW	
Types of Complaints	Specific complaints
<p><b>Privacy</b> You may make a complaint regarding the way in which CSNSW has managed your personal information by contacting CSNSW's Privacy Officer by email: <a href="mailto:privacy@csnsw.catholic.edu.au">privacy@csnsw.catholic.edu.au</a></p>	Use of Personal information
<p><b>Participating in Catholic School Sports activities</b> Students and their parents/carers participating in CSNSW Sports activities may make a complaint to CSNSW regarding any of the matters described in the adjacent column by contacting the Director of CSNSW Sport.</p>	Child Protection
	Student Wellbeing
	Health and Safety
	Student and Parent behaviour
	Sports organisation and management
<p><b>Services or functions</b> You may make a complaint to CSNSW about any of the services it provides or the functions it carries out on behalf of Catholic Schools in NSW. Some examples of the types of complaints are shown in the adjacent column (<b>note</b>: this is not an exhaustive list).</p>	Social Media
	Training (e.g. governance)
	Vocational Education Training (VET)
	Census Collection
<p><b>Approved registration system authority for Catholic systemic or member schools</b> You may make a complaint to CSNSW in respect to compliance with the registration requirements of member schools (as set out in the NSW Education Standards Authority Registration requirements of NSW Registration Systems and Member Non-government Schools Manual). CSNSW will investigate the degree to which a school has appropriate policies and procedures in place to meet NESA requirements. (<b>note</b>: this is not an exhaustive list).</p>	National Consistent Collection of Data (NCCD)
	Security and supervision
	Curriculum and learning needs
	Teaching and learning facilities
	Discipline



### Complaints to Other Parties

<p><b>Parental complaints</b></p> <p>The Catholic Schools Office in the Diocese in which the child’s school operates is responsible for the day to day running of the school.</p> <p>Complaints that relate to a child attending a Catholic School in NSW must be referred directly to the child’s school in the first instance.</p> <p>Parental complaints which have not been satisfactorily resolved by the school must be directed to the relevant Catholic Schools Office.</p>	Enrolment	<p>Refer to the school in the first instance</p> <p>If unresolved, refer to relevant Catholic Schools’ Office</p>
	Attendance	
	School fees	
	Bullying	
	Wellbeing	
Child Protection		
<p><b>Diocesan and school employees</b></p> <p>Diocesan employees are employed by their respective Diocese and must follow Diocesan processes and procedures for making complaints or raising issues.</p>	Workplace grievances	<p>Refer to relevant Catholic Schools’ Office</p>
	Bullying	
	Harassment	
	Discrimination	

**Schedule 3 – Other complaints**

<p><b>Capital grants</b></p> <p>CSNSW is the block grant authority which administers funding for capital expenditure for member Catholic schools in NSW. Funding is distributed in accordance with the CBGA Principles. Complaints or a review of a decision regarding CBGA grants are not dealt with under this Policy but in accordance with the CBGA Principles.</p>	
<p><b>Whistleblower disclosures</b></p> <p>A person who seeks to make a disclosure of Reportable Conduct may do so on a confidential basis in any one of the following ways:</p> <ul style="list-style-type: none"> <li>➤ By calling CSNSW’s dedicated toll-free number within Australia on 1800 945 077 which is available to receive calls 24 hours, 7 days per week; or</li> <li>➤ By making a report online via the SpeakUp website at SpeakUp; or</li> <li>➤ By emailing CSNSWspeakup@deloitte.com.au; or</li> <li>➤ By sending a letter via reply paid post to  CSNSW SpeakUp, Reply paid 12628, A’Beckett Street, Victoria 8006.</li> </ul> <p>You can find more information about CSNSW’s Whistleblower policy by clicking on this <a href="#">link</a>. Importantly, if you are employed by another entity or you are a supplier to another entity, and you wish to make a disclosure of reportable conduct about that entity, CSNSW may not be able to extend the protections of the Whistleblowing regime to you.</p> <p>Your complaint will be dealt with in confidence but may be referred to your employer for investigation.</p>	Fraud
	Offences
	Tax Disclosures
	Misconduct
	Public Interest Disclosure
Emergency Disclosure	