

1. Policy Statement

We recognise that families, educators, other staff and the community need to feel confident that any concerns or issues they may raise will be handled promptly and professionally. We will provide effective complaints management which meets our families'/carers' needs.

1.1 Child-focused complaints culture

A positive complaints culture is at the core of our child-focused complaint handling approach. Our policy for Dealing with Complaints, puts children's safety, needs and interests at the forefront. We are committed to:

- Helping children understand their rights and to speak up when something is not right. Educators support children to raise any concerns or complaints. Educators are trained to respond to children verbally and non-verbally communicating that something is wrong
- Keeping children safe. Anyone raising a concern or making a complaint, including those related to a child's safety and well-being, will feel safe and supported by us. We will always act on harm or risk of harm to a child
- Letting everyone know that complaints are welcome and will be taken seriously
- Responding to complaints sensitively, impartially, professionally, transparently, promptly and thoroughly

2. Background

The Education and Care Services National Regulations require approved providers to ensure their services have policies and procedures in place for dealing with complaints. Our 'Dealing with Complaints Policy' means our educators, management, co-ordinators, other staff, families and the community can be confident that complaints and grievances are taken seriously and addressed effectively.

The Guide to the National Quality Framework describes how an effective system for dealing with complaints confirms to educators, staff, families and the community that complaints and grievances are taken seriously and investigated promptly, fairly and thoroughly. Effective complaints management is an efficient way to consider and act on feedback from families and inform quality improvement (Element 7.1.2: Management systems).



Complaints offer service leaders a valuable opportunity to improve the quality practices of their education and care. Each complaint serves as a springboard for reflection on our service's processes, procedures and practices, allowing for meaningful change.

3. Aims

- To ensure policies and procedures are in place for dealing with complaints and take reasonable steps to ensure those policies and procedures are followed.
- To ensure we manage complaints and concerns effectively, and that our complaints handling processes are clear and understood by children, families, communities and staff
- To ensure our complaint handling system is child focused and addresses the management of a complaint including where a child is alleged to exhibit harmful sexual behaviours (s 168(o))
- To ensure SPLASH has child-focused policies and procedures for complaints and concerns in place that align with the National Principles for Child Safe Organisations
- To ensure this policy fulfills its requirements when we lodge our child safe environment compliance statement with the Department of Human Services

4. Legislative Requirements

Education and Care Services National Law and Regulations

| Section/Regulation | Description |
|--------------------|--|
| Section 167 | Offence relating to protection of children from harm and hazards |
| Section 172 | Offence to fail to display prescribed information |
| Section 173 | Offence to fail to notify certain information to Regulatory Authority |
| Section 12 | Meaning of serious incident |
| Section 168(2)(h) | Education and care services must have policies and procedures in relation to providing a child safe environment |
| Section 168(2)(o) | Education and care services must have policies and procedures in relation to dealing with complaints, including matters relating to <ul style="list-style-type: none"> (i) the provision of a complaint handling system that is child focused; and (ii) the management of a complaint that alleges a child is exhibiting harmful sexual behaviours |
| Section 170 | Policies and procedures to be followed |



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| Section 171 | Policies and procedures to be kept available |
| Section 172 | Notification of change to policies and procedures |
| Section 173 (2)(b) | Prescribed information to be displayed: the name and telephone number of the person to whom complaints may be addressed |
| Section 175(d)(e) | Prescribed information to be notified to Regulatory Authority |
| Section 176 | Time to notify certain information to Regulatory Authority |
| Regulation 168 | Education and care service must have policies and procedures |
| Regulation 170 | Policies and procedures to be followed |
| Regulation 171 | Policies and procedures to be kept available |
| Regulation 172 | Notification of change to policies or procedures |
| Regulation 173 | Prescribed information to be displayed |
| Regulation 176 | Time to notify certain information to Regulatory Authority |

Other applicable laws and regulations

| Act/Regulation | Description |
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| Equal Opportunity Act 1984 (SA) Disability Inclusion Act 2018 (SA) Australian Human Rights Commission Act 1986 (Cth) (AHRC Act) | Human rights laws |
| Children and Young People (Safety) Act 2017 (SA) Children and Young People (Safety) Regulations 2017 | Principal relevant Act to child protection |
| Criminal Law Consolidation Act 1935 (SA) | Includes provisions for child-related criminal offences |
| Work Health and Safety Act 2012 (SA) | Workplace health and safety |

National Quality Standard

| Standard | Concept | Description |
|----------|------------------------|--|
| 2.2 | Safety | Each child is protected |
| 2.2.3 | Child Protection | Management, educators and staff are aware of their roles and responsibilities to identify and respond to every child at risk of abuse or neglect |
| 4.2 | Professionalism | Management, educators and staff are collaborative, respectful and ethical |
| 4.2.2 | Professional standards | Professional standards guide practice, interactions and relationships |
| 5.1 | Relationships between | Respectful and equitable relationships are maintained with each child |

Living and Learning Together in Christ



| Standard | Concept | Description |
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| | educators and children | |
| 5.1.1 | Positive educator to child interactions | Responsible and meaningful interactions build trusting relationships which engage and support each child to feel secure, confided and included |
| 5.1.2 | Dignity and rights of the child | The dignity and rights of every child is maintained |
| 5.2 | Relationships between children | Each child is supported to build and maintain sensitive and responsive relationships |
| 5.2.2 | Self-regulation | Each child is supported to regulate their own behaviour, respond appropriately to the behaviour of others and communicate effectively to resolve conflicts |
| 6.1 | Supportive relationships with families | Respectful relationships with families are developed and maintained and families are supported in their parenting role |
| 6.1.2 | Families are supported | Current information is available to families about the service and relevant community services and resources to support parenting and family wellbeing |
| 7.1 | Governance | Governance supports the operation of a quality service |
| 7.1.2 | Management systems | Systems are in place to manage risk and enable the effective management and operation of a quality service |
| 7.1.3 | Roles and responsibilities | Roles and responsibilities are clearly defined, and understood, and support effective decision-making and operation of the service |
| 7.2 | Leadership | Effective leadership builds and promotes a positive organisational culture and professional learning community |
| 7.2.1 | Continuous improvement | There is an effective self-assessment and quality improvement process in place |
| 7.7.3 | Development of professionals | Educators, co-ordinators and staff members' performance is regularly evaluated and individual plans are in place to support learning and development |

My Time, Our Place Learning Framework (MTOP) V.2.0

| EYLF outcome | Key Component |
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| 3: Children have a strong sense of wellbeing | <ul style="list-style-type: none"> Children become strong in their social, emotional and mental wellbeing Children become strong in their physical learning and wellbeing |

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| | <ul style="list-style-type: none"> Children are aware of and develop strategies to support their own mental and physical health and personal safety |
| 5: Children are effective communicators | <ul style="list-style-type: none"> Children interact verbally and non-verbally with others for a range of purposes |

National Principles for Child Safe Organisations

| Most relevant principles |
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| 2. Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously |
| 3. Families and communities are informed and involved in promoting child safety and wellbeing |
| 6. Processes to respond to complaints and concerns are child focused |

5. Principles informing our Policy

- Children’s safety, health and wellbeing is our key priority. In line with regulatory requirements, we notify the regulatory authority of any complaints alleging the occurrence of a serious incident or contravention of the Education and Care Services National Law.
- Our families are integral to our service. We welcome their input into all aspects of our service’s operation, including any complaints they may have.
- We welcome complaints as an opportunity to enhance the quality of our education and care practices. We reflect on each complaint received, identifying any issues or areas of improvement for our service.

6. Key terms

| Term | Meaning | Source |
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| ACECQA - Australian Children’s Education and Care Quality Authority | The independent national authority that works with all regulatory authorities to administer the National Quality Framework, including the provision of guidance, resources and services to support the sector to improve outcomes for children. | acecqa.gov.au |
| Complaint | Expression of dissatisfaction made to or about an organisation, related to its products, services, staff | Australian and New Zealand Standard Guidelines for |



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| | or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required. | complaint management in organisations – AS/NZS 10002:2014 |
| Complaints handling | Effective resolution of a problem before it becomes worse and providing a remedy. | Commonwealth Ombudsman – Better practice complaint handling guide |
| Investigation | A formal and systematic inquiry to establish facts about a complaint by collecting, documenting, examining and evaluating evidence. An investigation is not an end in itself. Throughout an investigation, the investigator should keep an open mind about the possible outcomes of the investigation, such as education, compliance action, or a decision not to pursue the matter. | Guide to the NQF (Regulatory Authority Powers – Monitoring, compliance and enforcement) |
| Personal information | Information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. | Privacy Act 1988 (Cth) |
| Concern | Any potential issue that could impact negatively of the safety and well-being of children | |
| Harm and risk of harm | These terms are used in this policy as overarching terms that cover neglect and various forms of abuse. It includes physical, sexual and psychological abuse; neglect; ill-treatment; grooming; exposure to family violence; commercial child sexual exploitation; online child sexual abuse; and sexual abuse that is perpetrated by other children and young people | |
| Natural justice | The right to be made aware of, and respond to, information which will be used in the course of a decision that will negatively affect the person | |
| Parents | Includes guardians and persons who have parental responsibilities for the child under a decision or order of court | |
| Staff | Paid employees, volunteers, students, and third parties who are covered in the scope of this policy | |

7. Links to other Policies

- Child Protection Policy



- Child Safe Environment Policy
- Child Safe Code of Conduct
- Child Safe Risk Management Plan
- Recruitment, Induction and Training Policy
- Incident, Injury, Trauma and Illness Policy
- Enrolment & Orientation Policy
- Governance & Management of a Service Policy

8. Induction and ongoing training

- All staff are given access to the Dealing with Complaints Policy during induction.
- At the time of enrolling their child, families are told about the Dealing with Complaints Policy and how to access it.
- Training will follow any incident which demonstrates a lack of understanding by staff members of the policy and its procedures.
- When the policy is reviewed annually, it is an opportunity for ongoing training and information sharing to assist managers, coordinators, educators and other staff to fulfil their roles effectively, and for families to re-engage with the policy.

9. Policy Review

Last reviewed: March 2026

Date for next review: March 2027



Procedural Guidelines

1. Principles

- We are committed to the safety and wellbeing of children, and to implementing the National Principles for Child Safe Organisations and the National Quality Framework across all levels of our service
- We are committed to implementing the MTOP (My Time, Our Place Learning Framework)
- We comply with all relevant legislation, regulations and standards at all times
- We have a child focused culture that enables and empowers children, families, community members, staff, and volunteers to raise any concerns or complaints
- Anyone raising a concern or complaint, including those related to a child's safety and wellbeing, will feel safe and supported by us
- We listen to children and take their concerns seriously. Our complaint system prioritises the safety of children and we have a culture of reporting
- Every reasonable precaution is taken to protect children from harm and hazards in our physical and online environments
- We always act on harm and risk of harm to a child
- Staff are given the training, resources and support to act on child safety and wellbeing concerns and complaints
- Our governance, operations policies, risk management plans, procedures, systems and practices are best-practice and up-to-date

2. Roles and Responsibilities

| Roles | Responsibilities |
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| Approved provider | <ul style="list-style-type: none"> • ensure that obligations under the Education and Care Services National Law and National Regulations are met • ensure the name and contact number of the person to whom complaints can be made is clearly displayed at the service (and FDC residence or approved venue, if applicable) • ensure that the regulatory authority is notified in writing within 24 hours of any complaints alleging that a serious incident has occurred at the service or that the Education and Care Services National Law has been breached |



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| | <ul style="list-style-type: none"> • discuss the complaint with the complainant and make notes from the meeting or discussion • take reasonable steps to ensure that nominated supervisors, educators and staff follow the Dealing with complaints policy and procedures • ensure that copies of the policy and procedures are readily accessible to nominated supervisors, coordinators, educators and staff, and available for inspection • notify families at least 14 days before changing the policy or procedures if the changes will: <ul style="list-style-type: none"> ○ affect the fees charged or the way they are collected or ○ significantly impact the service's education and care of children or ○ significantly impact the family's ability to utilise the service • regularly review the policy and procedures to ensure serious incidents and complaints are investigated promptly, fairly and thoroughly • ensure that complaints result in reviews of relevant policies, procedures and practices. |
| Nominated supervisor | <ul style="list-style-type: none"> • ensure that regulatory obligations are met in relation to dealing with complaints • implement procedures for dealing with complaints • inform families and the broader service community of the Dealing with complaints policy and procedures • discuss the complaint with the complainant • ensure the approved provider is aware of the complaint, if it is a notifiable complaint, or if a complaint cannot be resolved • ensure the complaint is documented • work co-operatively with the approved provider, educators, staff and/or the complainant during the investigation or resolution of a complaint • regularly review the policy and procedures to ensure serious incidents and complaints are investigated promptly, fairly and thoroughly • ensure that complaints result in reviews of relevant policies, procedures and practices. |
| Educators | <ul style="list-style-type: none"> • understand and implement the Dealing with Complaints Policy and Procedures • report all complaints received to the nominated supervisor and/or approved provider promptly so timeframes can be adhered to • support the nominated supervisor and approved provider in the investigation and/or resolution of complaints. • Always raise complaints using the procedures and appeal process first before approaching an external complaints body, such as a court or Tribunal • Complete necessary records when required. Provide them to the approved provider/nominated supervisor as soon as practicable |
| Families | <ul style="list-style-type: none"> • be familiar with and follow the Dealing with complaints policy and procedures |



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| | <ul style="list-style-type: none">• raise any issues or complaints in line with the policy and procedures• cooperate with service representatives dealing with complaints.• Contribute to policy and procedure reviews and risk assessments and plans. |
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3. Procedures

Procedures are attached to the Dealing with Complaints Policy and kept in the office and the School's Website.

3.1 An effective, accessible and culturally safe complaint system

- Our process for managing complaints is easy to understand, accessible and culturally safe
- Our Complaint Handling Procedure can be used by children, families, community members, visitors and staff if they want to raise a concern or make a complaint. It explains how to make the complaint, who to make it to, and how it will be dealt with. It gives staff clear steps to follow to manage any complaints they receive
- Our Complaint Handling Procedure is written in plain language. We provide appropriate versions for children and people from all backgrounds and abilities (e.g., pictures, diagrams, displays, audio, in different languages where needed) We have a child-friendly poster showing the complaint process displayed in the foyer area. We clearly display the name and contact details of the person to whom complaints should be made in the foyer area.
- Parents are told how they can make a complaint or raise a concern during their child's enrolment and orientation. They are given information on how to access the policy.
- Our complaint handling system is explained to staff at induction and in their ongoing program of professional development. We have clearly defined roles and responsibilities for staff, so they know what they need to do if someone has a concern or a complaint our staff are trained to respond to concerns and complaints in a culturally sensitive way. That means that, when they are dealing with complaints, they are expected to:
 - be open-minded and flexible in their attitudes to different cultural practices
 - understand that their own cultural values or practices are not the only way to solve a problem



- encourage and support everyone at the service to express and enjoy their cultural rights

3.2 Reporting complaints and concerns

- We take complaints and concerns about child safety and wellbeing seriously
- For concerns about harm or risk of harm to a child (either by adults or by other children), or allegations that a child is exhibiting harmful sexual behaviour, staff follow our Child Protection Policy and Procedures.
- Depending on the complaint, we may need to:
 - Make a report to the Child Abuse Report Line (CARL) and/or police
 - Make a referral to family services or exchange of information with certain professionals/organisations
 - Notify the regulatory authority
- As the approved provider we must, by law, notify the regulatory authority in writing
 - Within 24 hours of any complaints alleging that a serious incident has occurred or is occurring while a child was or is at SPLASH
 - Within 24 hours of any complaints that the National Law has been breached
 - Within 24 hours of the incident (or within 24 hours of the approved provider becoming aware of the incident) of any allegation that physical or sexual abuse of a child has occurred or is occurring while the child is at SPLASH using complaints to support continuous improvement
- We see complaints and concerns as a valuable source of information. They can highlight issues for our service, and we use them as a trigger for us to critically reflect on our infrastructure and operations (systems, documents, communication, practices, activities, policies, procedures)
- We keep accurate and full records of complaints and actions taken in response
- We review our complaints and reporting procedures regularly, in consultation with children, their families and the community
- We analyse the cause of complaints with a view to fixing any flaws or shortcomings in our infrastructure, documents or operations
- We track complaints to identify recurring issues within the Service.



- Where appropriate, we request feedback on the complaint process using a questionnaire.

3.3 SPLASH Complaints Process

The following guidelines will assist you if you have a concern.

1. Make a time to talk privately to the person with whom you have a concern, or with whom your concern is closely related. Let them know what subject you wish to discuss as this will facilitate the process. This makes the most productive use of the time available – when the individual is free to give you his / her full attention.
2. Meet with the SPLASH staff member and use appropriate problem solving and/or conflict resolution strategies to formulate positive action for future.
That is:
 - Identify the facts
 - Explore why the facts present a problem
 - Share feelings
 - Jointly commit to some future action and goals within the guidelines of SPLASH policy, procedure and importantly, by observing school and SPLASH values.
3. If you consider that the issue you have raised is still unresolved, it is important that you state this to the person at the conclusion of the meeting.
4. If the issues are not resolved, make an appointment with the SPLASH Director. Let him/her know what subject you wish to discuss as this will facilitate the process.
5. Meet with the SPLASH Director. Results of this meeting may include the following.
 - the situation is monitored;
 - further discussions with the people involved; and/or
 - outside support for the child or family may be sought.
6. If you are still dissatisfied with the outcome of the meetings, write to the SPLASH Director to air your concerns. If SPLASH does not receive further information it is reasonable to assume that the issue has been resolved.
7. If after steps 1-6 you are still dissatisfied, approach the School Principal who will try to resolve the situation further. The expectation of you by the Principal will be that the above steps have been followed.

Steps 1-6 are considered appropriate toward the resolution of all grievances. If there is the case where a parent feels uncomfortable meeting with the appropriate SPLASH staff member, then an



agreed mediator should be sought. Example: another SPLASH staff member, SPLASH Director, pastor or agreed professional.

In the rare event that a person feels steps 1-6 did not result in a satisfactory conclusion, the final point of call is to contact the Regulatory Authority – the Education Standards Board of SA.

3.4 Other Considerations

It is important that these complaints are kept confidential, and although at times you may wish to seek support from friends or an advocate, it is very important to do this with discretion.

When the matter is discussed in the student's hearing, it is important that the student understands that you have confidence that this issue will be resolved confidentially at the SPLASH level.

Whilst constructive criticism, appropriately shared and in line with this policy is welcomed, denigration or defamation of the SPLASH service and staff does not support best practice of the child's care as it undermines trust and confidence. SPLASH can only deal with issues that are raised in the ways outlined above. If we do not receive information then we assume that all is well.

In the event that a parent persists in airing grievances in an inappropriate manner, the parents/s will be required to attend a meeting with the SPLASH Director, School Principal and/or Chair of School Council. Consultation by the principal and/or chairperson for the benefit of maintaining confidence, trust and confidentiality, will occur and this policy will be highlighted as an expectation for all.

Due to the importance that the SPLASH service places on the building and maintenance of positive community relationships, repeated deviation from policy may result in the termination of enrolment from the SPLASH service.

4. Policy Communication, Training and Monitoring

- This policy and related documents can be found in the staff shared folder.
- The approved provider and nominated supervisor provide information, training and other



resources and support regarding the Dealing with Complaints Policy and Procedures and related documents

- All staff (including volunteers and students) are formally inducted. They are given access to, review, understand and formally acknowledge this Dealing with Complaints Policy and Procedures and related documents
- The nominated supervisor runs a professional development program annually for staff members, which covers this policy and procedures and provides an opportunity to update if necessary.
- Roles and responsibilities are clearly defined in this policy and in individual position descriptions. They are communicated during staff inductions and in ongoing training
- The approved provider and nominated supervisor monitor and audit staff practices which may include performance reviews and supervision sessions and address non-compliance. Breaches to this policy are taken seriously and may result in disciplinary action against a staff member
- At enrolment, families are given access to our Dealing with Complaints Policy and Procedures and related documents
- Families are notified in line with our obligations under the National Regulations, when changes are made to our policies and procedures.

5. Procedures Review

Last reviewed: March 2026

Date for next review: March 2027

6. Sources

[ACECQA Dealing with Complaints policy guidelines](#)