

Avalon Boarding Pty Ltd

COMPLAINTS & GRIEVANCES POLICY

1. Purpose

Avalon College is committed to providing a clear, fair and accessible complaints and grievances process to ensure that all concerns raised by students, parents, staff and the wider school community are addressed appropriately.

This policy aligns with **VRQA standards, Ministerial Order No. 1359**, and the principles of **procedural fairness**.

It provides clear processes for responding to:

- General complaints and grievances
- Complaints relating to child safety, including allegations of abuse, neglect or grooming
- Breaches of the **Child Safety Code of Conduct (AC-CSP-002)** or other Avalon policies

This policy ensures all staff, volunteers, contractors, students and families understand their obligations to act and report.

This policy is consistent with expectations outlined in:

- **Avalon College Acceptance & Enrolment Policy (AC-ENR-001)**
 - **Enrolment Agreement (AC-ENR-002)**
 - **Refund Policy (AC-ENR-004)**
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2. Scope

This policy applies to:

- Current students and their families
- Staff, volunteers and contractors
- Any member of the Avalon College community wishing to lodge a complaint or grievance

It covers complaints made by or in relation to any student, staff member, volunteer, contractor, visitor or service provider connected to Avalon College.

3. Guiding Principles

Avalon College is committed to:

- Zero tolerance for child abuse
- Treating all complaints seriously, respectfully and confidentially
- Protecting complainants from victimisation or disadvantage
- Ensuring timely and transparent processes
- Acting in accordance with relevant legislation, including:
 - **Ministerial Order No. 1359**
 - ***Children, Youth and Families Act 2005 (Vic)***
 - ***Crimes Act 1958 (Vic)***

4. Types of Complaints

1. **General Complaints:** Relating to academic, boarding, administrative or facility matters
2. **Child Safety Complaints:** Allegations or concerns about abuse, neglect, grooming or failure to protect
3. **Breaches of the Code of Conduct:** Relating to breaches of the Child Safety Code of Conduct (**AC-CSP-002**) or other policies

5. Complaint-Handling Process

Avalon College follows a transparent step-by-step complaint-handling process for **general complaints, child safety concerns** and **breaches of conduct**.

Step 1: Receiving the Complaint

- Complaints may be made verbally or in writing using:
 - **AB-GOV-011 Complaint Form**
 - **AC-CSP-008 Child Safety Concern Form**
- All complaints are acknowledged within **2 working days**

Step 2: Initial Assessment

- Ensure immediate safety of any child involved
- Refer child safety complaints immediately to the **Child Safety Officer** or **Managing Director**
- Determine if mandatory or discretionary reporting is required

Step 3: Protective Actions

- Implement interim protection measures (e.g., supervision changes, support services) to ensure student safety during investigation.

Step 4: Investigation

- **General complaints:** investigated by the relevant manager or delegate
- **Child safety complaints:** managed per **AC-CSP-007 Mandatory Reporting Policy** and **Reportable Conduct Scheme**
- **Conduct breaches:** investigated internally and escalated to external authorities where required

Step 5: Recordkeeping

- All complaints and outcomes are documented and stored securely in line with **AC-CSP-009 Recordkeeping & Information Management Procedure**

Step 6: Outcome and Communication

- Complainant advised of the outcome in writing (where appropriate) within **20 working days**
- Outcomes may include corrective action, disciplinary measures, referral to external agencies or policy review

Step 7: Review and Feedback

- Complaints and outcomes reviewed at Leadership Team meetings
- Feedback used to strengthen school policy, culture and practices

Privacy & Confidentiality: All complaints are handled with sensitivity and confidentially, only staff directly involved have access to complaint information.

Cross-References:

- **AC-CSP-001 Child Safety & Wellbeing Policy**
- **AC-CSP-002 Child Safety Code of Conduct**
- **AC-CSP-007 Mandatory Reporting Policy**
- **AC-CSP-009 Recordkeeping & Information Management Procedure**

5.1 General Complaints

- Attempt informal resolution with the relevant staff member
- If unresolved, submit **AB-GOV-011 Complaint Form**
- Investigated within **10 working days**
- Written outcome provided
- Escalation options include:
 - Managing Director
 - VRQA
 - External authorities (e.g., Dispute Settlement Centre of Victoria)

5.2 Child Safety Complaints

- Report immediately to the **Child Safety Officer** or **Managing Director**
- Risk assessment and interim protective measures initiated
- **Mandatory reporting** required as soon as practicable to:
 - **Victoria Police**
 - **DFFH Child Protection**
 - In line with **AC-CSP-007**
- **Documentation:**
 - Use **AC-CSP-008 Child Safety Concern Form**
 - Log securely in **Orah**
- **Notifications:**
 - **Commission for Children and Young People (CCYP)** if allegation involves staff or volunteers
- Ongoing monitoring and support provided to the student

5.3 Breaches of the Code of Conduct

- All breaches of **AC-CSP-002** must be reported to the **Child Safety Officer** or **Managing Director**
- Investigated internally by the Managing Director or delegate.
- Outcomes may include:
 - Disciplinary action
 - Termination of employment or volunteer role
 - Referral to **Victoria Police, DFFH** or **CCYP** as required

5.4 Reporting to Authorities (Legal & Non-Legal Obligations)

Mandatory Reporting

- All staff must report suspected **physical or sexual abuse** in line with ss.182–184 of the *Children, Youth and Families Act 2005 (Vic)*
- Staff must comply with obligations under the *Crimes Act 1958 (Vic)* (Failure to Protect and Failure to Disclose)

Non-Mandatory Reporting

- Avalon College may make discretionary reports to Victoria Police, DFFH or the Commission for Children and Young People in the best interests of child safety and wellbeing, even if not legally required
- Decisions made by the **Managing Director** or **Child Safety Officer**

Cooperation with Authorities

All staff, volunteers and contractors must:

- Cooperate fully with investigations by **Victoria Police, DFFH, CCYP or VRQA**
- Provide truthful information
- Preserve evidence
- Maintain confidentiality
- Not obstruct, delay or interfere with investigations

5.5 Legal Obligations – CYF Act

- All staff who are mandated reporters must comply with their legal obligations under the **Children, Youth and Families Act 2005 (Vic)**.
- **Mandatory reporters** must make a report to Child Protection or Victoria Police as soon as practicable if they form a **reasonable belief** that a child is at risk of physical or sexual abuse.
- This obligation is **personal** and must be fulfilled even if:
 - A report has already been made
 - Leadership does not agree
 - An internal investigation is underway

Avalon College policies do **not** override legal obligations.

6. Child Safety Complaints Procedure

Avalon College has a dedicated procedure for responding to **child safety-related complaints** including allegations of child abuse:

- **Receiving Complaints:** Immediate referral to **Child Safety Officer** or **Managing Director**
- If the complaint involves either of these roles, the complaint must be referred to the **Education Manager** as the alternative complaint manager.
- **Immediate Risk Assessment:** Conducted within 24 hours. Interim protective measure implemented.
- **Child Support:** Children are listened to, offered age-appropriate support and counselling. Children and families are updated regularly throughout the process.
- **Investigation & Reporting:**
 - **Mandatory reporting** to **Victoria Police** or **DFFH**
 - **Staff allegations** reported to **CCYP under the Reportable Conduct Scheme**.
- **Recordkeeping:** All complaints documented using **AC-CSP-008**; stored in line with **AC-CSP-009**
- **Monitoring:** Overseen by Business Manager; reviewed annually
- **Alternative Pathways:** Complaints may be made directly to:
 - **VRQA**
 - **CCYP**
 - **Victoria Police**
 - **DFFH**
- **Contacts:** Details - name, email and phone numbers for Child Safety Officers included in the Appendix and displayed on posters throughout the College

7. Legal and Ethical Obligations

All staff, volunteers and contractors must:

- Fulfil duties under the *Crimes Act 1958 (Vic)* and *Children, Youth and Families Act 2005 (Vic)*
- Comply with **Ministerial Order No. 1359**
- Act independently to report, regardless of whether leadership shares belief.
- Protect student privacy in line with the ***Privacy and Data Protection Act 2014 (Vic)***
- Uphold procedural fairness in disciplinary processes
- Never place the burden of reporting on a child

7.1 Independent Reporting Obligations

While Avalon College maintains clear internal roles and procedures for managing and responding to child safety complaints, these processes **do not displace or override** the individual legal responsibilities of staff, volunteers, contractors or leaders under **Victorian law**.

All individuals engaged by Avalon College retain a **personal legal duty** to report concerns regarding child safety and abuse, as outlined below:

- **Mandatory Reporting:**
All staff, volunteers, contractors, and leaders must make a report to **Victoria Police** or **DFFH Child Protection** if they form a *reasonable belief* that a child is at risk of **physical or sexual abuse**, in accordance with sections 182–184 of the ***Children, Youth and Families Act 2005 (Vic)***.
- **This legal obligation applies even when:**
 - The matter is already being addressed internally by the **Child Safety Officer, Managing Director**, or other designated leader
 - An internal investigation or reporting process is already underway
 - Another staff member has already made a report about the same concern
- **Nothing in Avalon College's complaints or reporting procedures may override or restrict an individual's obligations** under:
 - ***Children, Youth and Families Act 2005 (Vic)***
 - ***Crimes Act 1958 (Vic)***, including the **Failure to Disclose** and **Failure to Protect** provisions

All individuals must act **independently and without delay** to report concerns, regardless of organisational hierarchy, internal disagreement or existing reporting actions.

8. Recordkeeping

- Complaints documented using:
 - **AB-GOV-011 Complaint Form**
 - **AC-CSP-008 Child Safety Concern Form**
- Records stored securely in accordance with **AC-CSP-009** and access restricted
- Allegations of child abuse retained **indefinitely** or as legally required
- Access restricted to authorised personnel only.

9. Communication and Accessibility

- Policy available via Avalon College website and handbooks
- Translated versions available upon request
- Child-friendly posters and student materials distributed summarise the complaints process.
- Students informed of complaint options during orientation and wellbeing programs.

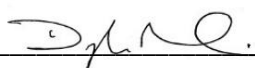
10. Responsibilities

Role	Responsibilities
Managing Director	Oversees policy implementation; ensures procedural fairness; notifies external agencies
Child Safety Officer	Manages child safety complaints, ensures protective actions, maintains records
Staff, Volunteers, Contractors	Report complaints, cooperate with investigations, preserve evidence, maintain confidentiality
Students and Families	Encouraged to raise concerns through appropriate channels without fear of reprisal.

11. Review and Continuous Improvement

- Policy reviewed **annually** or after significant complaints
- Feedback incorporated from staff, students, and families
- Regular audits to ensure compliance with legal and VRQA standards

Approved by: Avalon College Managing Director

Signature: 

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