

Complaint Handling Policy

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Section 1 – Background

BlendED National Ltd is a Company Limited by Guarantee and is a registered not-for-profit with the Australian Charities and Not-for-Profit Commission ('ACNC').

The charism of Blessed Edmund Rice expressed through the touchstones of Liberating Education, Gospel Spirituality, Inclusive Community and Justice and Solidarity, underpins our continued commitment to a safe and inclusive environment for all.

BlendED National Ltd is committed to conducting its operations in an open and honest manner. It seeks to maintain the highest ethical standards in order to mitigate the regulatory, financial, legal and reputational risks of BlendED National Ltd. It is committed to a culture of integrity and accountability and systems that support transparency in decision-making, good governance and ethical behaviour.

Section 2 – Purpose

The purpose of this policy is to outline the Complaint handling principles, expectations, and requirements of BlendED National, its Schools and Staff.

Adherence with this policy is designed to ensure that best practice occurs for reporting, recording, investigating, finalising, reviewing, and monitoring Complaints, and their outcomes.

BlendED National adheres to the standards for School Registration in all jurisdictions for which BlendED National is the governing authority that requires all Schools to have evidence of their local policy and procedure in relation to complaints management.

Section 3 – Scope

This policy applies to all Young People, parents, carers, families, Staff, Volunteers, Contractors, and Board Directors, at BlendED National and in each of its Schools. This policy covers all physical, virtual, and online environments, encompassing on and off-site school premises.

This policy should be read in conjunction with the Complaint Handling Guidelines and Procedures. This policy covers concerns and complaints relating to:

- a wrongful act;
- failure to do something that should have been done;
- behaviour or conduct that is unfair or impolite;
- an act or behaviour that is contrary to the BlendED National Codes of Conduct, including Complaints from Young People, parents/carers or other members of the greater BlendED National community that pertain to bullying,
- discrimination, harassment, sexual harassment and victimisation;
- issues related to enrolments;
- communication issues;
- general administration issues; and/or
- any other concern or issue similar to the above that is not specifically listed below as outside the scope of this policy.

The following concerns and complaints are outside the scope of this policy:

- Child Safeguarding and wellbeing concerns or risks of harm to Children and Young People. Please refer to the suite of Child Safety policies for more information;

- Complaints by Staff members relating to their employment, to discrimination, bullying or harassment in the workplace, or other workplace related grievances.
- Formal legal proceedings.

Section 4 – Definitions and Interpretations

Where the following term(s) and acronym(s) are used within this policy they are intended to have the meaning(s) as outlined below:

4.1 Definitions

Term	Definition
Appeals Manager	means the Staff member who has been assigned the responsibility of considering and managing an initial Internal Appeals request.
Assurance	means the BlendED National software and digital storage system used to record, store and report on compliance related matters in the organisation.
Board	means the BlendED National Board.
Board Committee	means a Committee of the Board, which may include persons other than Board Directors.
Board Directors	means Directors of the Board.
Complainant	means the person making the Complaint.
Complaint	means a reasonable expression of dissatisfaction made to BlendED National, or one of its Schools, related to our services or operations, or the Complaints handling process itself, where a response or resolution is explicitly or implicitly expected.
Complaint Manager	means the Staff member who has been assigned the responsibility of managing and investigating a Formal Complaint.
Contractor	means someone engaged by BlendED National to perform specific tasks. Contractors are not employees of the BlendED National.
Effective Date	means the date of publication of the policy.
Final Appeals Manager	means the Staff member (usually a member of the NLT) who has been assigned the responsibility of considering and managing a final appeals request.
Formal Complaint	means a Complaint about a matter that is serious, complex or may pose a threat to the health and safety of any person, or where it is not appropriate to be handled by the informal management processes.
Principal	means the appointed authority of a BlendED National School.
Informal Complaint	means a complaint 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.
Internal Appeal	means the internal process available for a Formal Complaint outcome / resolution to be reviewed.
Procedures	refers to the Complaint Handling Guidelines and Procedures.
Procedural Fairness	also known as natural justice, requires decision-makers to be objective, unbiased, and have no personal interest in the matter being decided. An individual should be

Term	Definition
	informed of the allegation(s) against them and have the opportunity to respond to the allegations before a decision is made.
Purpose	means the purpose section of this policy.
Regional Director	means the appointed authority of BlendED National Schools within the Region.
Reporting Obligations	also known as reportable conduct, mandatory reporting, and means the definition under the relative jurisdictions in which each of the Schools operate. These include a sexual offence, sexual misconduct, ill-treatment of a child, neglect of a child, an assault against a child, failure to protect, failure to report under the respective legislative instruments applicable in each jurisdiction; and behaviour that causes significant emotional or psychological harm to a child.
Respondent	means the person who is referred to in a Complaint by a Complainant as the person responsible for their concerns or who can best respond to their concern.
School(s)	means the registered non-government schools (including Registered Training Organisations ('RTO') and other educational facilities) located in and operating within Australia that are listed in Schedule 1, and such other schools, RTO or educational facilities as BlendED National may establish in Australia or acquire, govern, and operate from time-to-time. This definition also applies to campuses of Schools and to a School operating across various sites.
Staff	also known as employee(s), means current BlendED National employees.
Teacher	means a person employed in a School who is qualified in that jurisdiction to practice as a teacher of children and Young People of school age.
Volunteer	means a person associated with a School who does unpaid work for that School by agreement with the School.
Young Person / Young People	also known as students, means those who are currently enrolled at one of the BlendED National Schools listed in Schedule 1.

4.2 Acronyms

Acronym	Full Reference
ACNC	means the Australian Charities and Not-for-Profit Commission.
CEO	means the BlendED National Chief Executive Officer (CEO).
COO	means the BlendED National Chief Operating Officer (COO)
NLT	means the BlendED National Leadership Team.
RTO	means Registered Training Organisation/s.
TEREA	means the Trustees of Edmund Rice Education Australia.

Section 5 – Policy Statement and Principles

5.1 Effect

This version of the policy replaces all previous versions, which are rescinded from the Effective Date of this policy.

5.2 Policy Statement

BlendED National acknowledges the right of persons associated with BlendED National to complain when dissatisfied with the manner in which it has managed its operations or services, including an action, inaction or decision. BlendED National encourages honest and constructive feedback and are committed to ensuring that Complaints received are handled in a way that is responsive, efficient, consistent, effective, and transparent.

BlendED National's approach to Complaint handling has been designed to be fair and robust, aiming at reaching supportive and mutually positive outcomes.

BlendED National will ensure that staff endorse this policy and can recognise, receive, and appropriately refer Complaints to the informal or formal Complaints procedures.

BlendED National recognises that time spent on handling Complaints can be an investment in better service to Young People and parents / carers, and a better culture for Staff and other person associated with BlendED National. BlendED National views

Complaints as a part of an important feedback and accountability process.

5.3 Governing Principles

BlendED National is committed to handling Complaints in a manner consistent with the following guiding principles:

- Complaints will be taken seriously, dealt with fairly and objectively, in a way that is culturally safe and sensitive, without judgment and addressed in a reasonable timeframe;
- Complaints should be resolved with as little formality and disruption as possible, having regard to the nature of the Complaint, with mediation, negotiation and informal resolution being optional alternatives;
- involved parties to the Complaint (e.g., the Complainant and any respondent) will be heard and/or may provide relevant information in relation to the Complaint;
- Complainants will have access to an appeals process, should they be dissatisfied with the outcome of the initial Complaint handling process;
- confidentiality, protection of privacy, respect, access, dignity and impartiality will form the basis of the Complaints raising, reviewing and resolution process;
- the Complainant and any Respondent will be offered support as appropriate;
- victimising behaviour towards a Complainant, Respondent or other related persons will not be tolerated;
- anonymous Complaints will be treated on their merits like any other Complaint, where possible; and
- Complainants that lodge a complaint in good faith and on reasonable grounds will not suffer any other reprisals on the bases of lodging the Complaint.

Section 6 – Roles and Responsibilities

All members of the BlendED National community play a part in implementing and upholding the principles of this policy. The details of those key responsibilities are outlined below:

Role	Responsibilities
Board	<ul style="list-style-type: none"> • Approving this policy. • Ensuring this policy is implemented, reviewed, and updated, as required. • Reviewing the BlendED National’s and Schools’ compliance with this policy. • Monitoring Complaints trends, methods of rectification and compliance with this policy (reports from the CEO).
Chief Executive Officer ('CEO')	<ul style="list-style-type: none"> • Overseeing the development of procedures and guidelines supporting adherence with this policy. • Ensuring this policy is implemented nationwide. • Ensure that appropriate Staff training is implemented in relation to Complaints resolution. • Reporting to the Board on compliance with this policy. • Manages Complaints that are escalated above regional level.
Regional Director	<ul style="list-style-type: none"> • Overseeing the implementation this policy and associated guidelines and procedures within their assigned regions. • Manages Complaints that are escalated Principal level.
Principals	<ul style="list-style-type: none"> • Ensuring the implementation this policy and associated guidelines and procedures within their assigned School. • Manages Complaints and appeals that are escalated above Head of Campus level.
	<ul style="list-style-type: none"> • Develop, implement, and publish Complaints handling processes in their School in accord with this policy and any regulatory requirements of state and territory authorities. • Ensure Staff are trained and empowered to participate in Complaint resolution as appropriate to their role and responsibility.
Chief Operating Officer (COO)	<ul style="list-style-type: none"> • Management of development and implementation of this policy and the related procedures and guidelines. • Initial receipt and assessment of Complaints and appeals received. • Confirming receipt of Complaint or appeal by return email to Complainant. • Assigning the role of Complaint Manager and/or Appeals Manager onto the appropriate Staff member to manage and investigate a Complaint or appeal. • Monitoring the Complaint handling and appeals process to ensure a timely resolution.
Complaint Manager	<ul style="list-style-type: none"> • Investigation and management of a Complaint, including collecting and analysing • information, working collaboratively with all parties involved, documenting the investigative process.

Role	Responsibilities
	<ul style="list-style-type: none"> • Decide on the most appropriate course of action / resolution. • Communicate the Complaint resolution / outcome with all parties and implementing and resulting outcomes or actions that came out of the Complaint investigation process. • Keep appropriate records of their processes.
Appeals Manager / Final Appeals Manager	<ul style="list-style-type: none"> • Consideration and management of appeals. • Undertake an assessment to determine if the original Complaint handling process followed BlendED National policy and procedures and whether the Complaint outcome / resolution was a reasonable conclusion. • Communicate their findings with all relevant parties. • Keep appropriate records of their processes.
Staff	<ul style="list-style-type: none"> • Adherence to and endorsement of this policy. • Encourage the use of informal Complaint handling processes where appropriate, in the first instance. • Maintain confidentiality. • Not victimise or act in reprisal against any party to the dispute or any person associated with them.
Young People / Young Person	<ul style="list-style-type: none"> • Being aware of this policy and how it applies to them.
Parents / Carers	<ul style="list-style-type: none"> • Being aware of this policy and how it applies to them and their Young Person.
All other parties to a dispute	<ul style="list-style-type: none"> • Read and understand this policy and how it should be correctly applied. • Lodge the Complaint as soon as practicable after the issue arises using the prescribed form. • Not deliberately provide false or misleading information or make frivolous or vexatious Complaint. • Act in good faith, in a non-threatening, calm and courteous manner, not victimise or act in reprisal against any party to the dispute. • Acknowledge that the common goal is to achieve an outcome acceptable to all parties. • Recognise that all parties have rights and responsibilities which must be balanced, and access support as needed. • Maintain and respect the privacy and confidentiality of all parties.

Section 7 – Complaint Handling Management

BlendED National operates a 3-stage Complaint handling management system which includes informal processes, formal processes, and internal appeals processes.

7.1 Informal Processes

BlendED National recognises that often Complaints are simple misunderstandings that are easily resolved through effective communication. We will actively aim to resolve Complaints informally wherever possible and encourage individuals to seek out informal Complaint resolution avenues in the first instance where it is appropriate to do so.

BlendED National staff are trained and empowered to play an active role in the informal Complaint process, as relevant to their roles and responsibilities.

Informal processes are designed to resolve issues promptly and collaboratively at the school level and may involve discussion, mediation and/or negotiation between the involved parties.

For more information about the Informal Complaint Handling Processes, including the types of informal processes and how to access them, please refer to the related Complaint Handling Guidelines and Procedures document.

7.2 Formal Processes

When an informal approach could not reach a satisfactory resolution, or the Complainant is not comfortable with the informal approach, or where the seriousness of the Complaint is not suitable for informal resolution, the Complaint will be handled using a formal Complaint handling process.

BlendED National Staff whose roles and responsibilities require it, are trained, and empowered to manage and resolve formal Complaints in accordance with this policy and the related Complaint Handling Guidelines and Procedures document.

Formal processes are designed to resolve issues in a more structured manner and may be managed at the School level, regional level or national level depending on the nature and seriousness of the Complaint.

For more information about the Formal Complaint Handling Processes, please refer to the Complaint Handling Guidelines and Procedures document.

7.3 Internal Appeals Processes

BlendED National acknowledges that in some instances a party to a Complaint may not be satisfied with the outcome of the Complaint handling process and resolution. Whenever a formal Complaint handling outcome is communicated, it will include information about the availability of an internal Complaint appeals processes.

BlendED National offers Complainants 2 levels of internal appeals, which will be assigned to the most appropriate level above that which handled the initial Complaint handling process. It is important to note that the role of the internal appeals processes is to review the resolution(s) and/or outcome(s) and the Complaint handling processes used, not to undertake a second investigation of the original Complaint.

For more information about the Internal Appeals Processes, please refer to the Complaint Handling Guidelines and Procedures document.

7.4 External Appeals Avenues

There are several external Complaint handling avenues available in instances where a person is not satisfied with the internal Complaint resolutions or appeal outcomes. Complainants can seek out advice from external parties such as the regulatory authorities for the jurisdiction of the related school, for example, in Queensland that would be the Non-State Schools Accreditation Board ('NSSAB'), the Queensland Human Rights Commission or the Fair Work Commission, or may seek their own independent legal advice.

7.5 Anonymous Complaints

BlendED National will investigate anonymous complaints if there is enough information in the Complaint submission to do so. Complainants are encouraged to provide as much detail as possible, particularly when wishing to remain anonymous so that issues raised can be addressed fairly and effectively.

When faced with people who behave unreasonably or Complaints that are found to be vexatious, BlendED National will take proactive and decisive action to manage any conduct that unreasonably affects BlendED National or its Schools and involved parties will be supported to do the same.

7.6 Confidentiality

BlendED National will afford privacy and confidentiality to all parties to the extent required by and permitted by law. Information with respect to the Complaint will remain confidential and only be disclosed to persons within BlendED National and its Schools on a need-to-know basis. Personally identifiable information about a Complainant will only be made available for the purpose of addressing the Complaint and, unless the Complainant consents, will be actively protected from disclosure.

All parties have a right, under Procedural Fairness, to know about Complaints that might be damaging to their reputation. Such Complaints will be known only to themselves and those who are consulted as part of the process.

BlendED National requires and expects that all parties will, when addressing concerns and Complaints, maintain the confidentiality of all parties strictly in accordance with confidentiality and privacy policies and legislative requirements.

7.7 Access to Support and Representation

BlendED National acknowledges that raising issues of conflict may be difficult for some people. Therefore, the option exists for a support person to be included, upon request and where relevant, for both the Complainant and Respondent(s), in any meetings investigating the Complaint.

The role of a support person is to provide physical and emotional support to the Complainant or respondent and will assist them throughout the meeting. They are not typically entitled to speak or advocate on their behalf during the meeting – an exception is made where the support person is a parent or carer providing support to a Young Person who is the Complainant.

A support person for a Young Person could be a parent or carer, friend, or other family member. A support person for a Staff member could be a colleague, friend, family member or union representative.

BlendED National may refuse a Complainant and/or Respondents' choice of support person if there is a potential conflict of interest.

Section 8 - Compliance and Accountability

8.1 Implementation

It is the responsibility of each School and office to ensure that their Staff, Volunteers and Contractors, and where relevant, Young People and their parents/carers, are trained in accordance with this policy. This policy will be made available to Schools through the BlendED National SharePoint portal.

On occasion where this policy undergoes major / key changes and updates, the BlendED National COO will communicate those changes with the relevant School level managers who will then be responsible for disseminating that information to their Staff, and where relevant, Young People and their parents/carers. Where major policy change makes it necessary, policy training modules will be developed by the BlendED National Policy Committee and will be made available to all relevant Staff via the SharePoint portal.

8.1.1 Continuous Improvement

Complaints can provide a valuable source of information about BlendED National and its Schools performance and any areas that need improvement. BlendED National will ensure that Complaints are recorded in a way that enables suitable analysis.

BlendED National will prepare regular reports on complaints that will include:

- the number and types of Complaints received in a given time period;
- the outcomes of the Complaints including implementation of improvements;
- any systemic issues identified;
- timeliness of responding to, and resolving Complaints; and
- any unresolved Complaints, or Complaints that have escalated to an appeals process.

8.2 Breach of this Policy

Individuals who breach this policy may be subject to disciplinary action, including and up to termination of their employment.

Individuals who become aware of an actual or suspected breach of this policy are obliged to report it. They may speak to their relevant manager or lodge a Whistleblower report (where the issue or concern is eligible), in accordance with the Whistleblower Policy.

8.3 Record Keeping

All records pertaining to this policy will be managed and maintained in accordance with the Records Management Policy and the related Retention, Archival, and Disposal schedule.

When handling all Complaints, BlendED National and its Schools will keep and maintain any records as required in compliance with statutory authority requirements.

BlendED National will keep records, in accordance with the Records Management Policy, of all policy review processes, including records and notes from policy audits, feedback and consultation processes, and any subsequent changes.

8.3.1 Complaint Register

BlendED National will maintain a Complaint register on our Assurance Platform, that can be separated out to School level, regional level, and national level. Each will include details such as the date, source and description of Complaints, the Staff member responsible for managing the complaint, the actions taken, outcome and date the complaint was closed.

Each Complaint register will be stored securely.

All Complaints shall be entered onto the Complaint register as soon as practicable after the Complaint is received.

To safeguard confidentiality and maintain the integrity of the Complaint handling process, access to the Complaint register will be limited to the COO and the CEO, with exceptions extending to regulatory authorities who make requests as a part of audit or registration processes.

Section 9 – Associated Information

This policy aligns with, and is supported and complimented by, the following Commonwealth and State/Territory legislation, standards, regulations, BlendED National policies and procedures, and other supporting forms and documentation:

Related Legislation, Policies and Procedures	
Relevant Legislation, Legislative Instruments, Standards and Regulations	<p>Commonwealth</p> <ul style="list-style-type: none"> • Age Discrimination Act 2004 • Australian Education Act 2012 and Regulation 2013 • Australian Human Rights Commission Act 1986 • Disability Discrimination Act 1992 • Disability Standards for Education • Family Law Act 1975 • Privacy Act 1988 • Racial Discrimination Act 1975 • Sex Discrimination Act 1984 • Standards Australia, Guidelines for complaint management in organisations (ISO 1002:2002, NEQ)
	<p>Queensland</p> <ul style="list-style-type: none"> • Anti-Discrimination Act 1991 • Child Protection Act 1999 • Civil Liability Act 2003 • Criminal Code Act 1899 • Domestic and Family Violence Protection Act 2021 • Education (Accreditation of Non-State Schools) Act and Regulation 2017 • Education (QCT) Act 2005 and Regulation 2016 • Education (General Provisions) Act 2006 • Public Health Act 2005 • Work Health and Safety 2011
	<p>Northern Territory</p> <ul style="list-style-type: none"> • Anti-Discrimination Act 1992 • Care and Protection of Children Act 2007 • Care and Protection of Children (Screening) Regulations 2010 • Criminal Code Act 1983 • Education Act and Regulations 2015

Related Legislation, Policies and Procedures	
	<ul style="list-style-type: none"> • Teacher Registration (NT) Act and Regulations 2004 • Personal Injuries (Liabilities and Damages) Act 2003 • Work Health and Safety Act NUL 2011
	<p>New South Wales</p> <ul style="list-style-type: none"> • Anti-Discrimination Act 1977 • Child Protection (Working with Children) Act 2012 • Children and Young Persons (Care and Protection) Act 1988 • Civil Liability Act 2002 • Crimes Act 1900 • Crimes (Domestic and Personal Violence) Act 2007 • Education Act 1990 • Education Standards Authority Act 2013 • Teacher Accreditation Act 2004 • Work and Health and Safety Act 2011
	<p>Tasmania</p> <ul style="list-style-type: none"> • Anti-Discrimination Act 1998 • Children, Young Persons and Their Families Act 1997 • Civil Liability Act 2002 • Criminal Code Act 1924 • Education Act 2016 and Education Regulations 2017 • Family Violence Act 2004 • Registration to Work with Vulnerable People Act 2013 and Regulations 2014 • Teachers Registration Act 2013 • Work Health and Safety Act 2012
	<p>South Australia</p> <ul style="list-style-type: none"> • Children and Young People (Safety) Act and Regulations 2017 • Child Safety (Prohibited Persons) Act 2016 and Regulations 2019 • Civil Liability Act 1936 • Criminal Law Consolidation Act 1935 • Education and Children's Services Act 2019 and Regulations 2020 • Equal Opportunity Act 1984 • Intervention Orders (Prevention of Abuse) Act 2009 • Teachers Registration and Standards Act 2004 and Regulations 2021 • Work Health and Safety Act 2012
	<p>Western Australia</p> <p>Children and Community Services Act 2004 and Regulations 2006</p> <ul style="list-style-type: none"> • Civil Liability Act 2002 • Criminal Code Act Compilation Act 1913 • Equal Opportunity Act 1984 • Registration Standards for Non-Government Schools • School Education Act 1999 and Regulations 2000 • Teacher Registration Act and Regulations 2012 • Working with Children (Criminal Record Checking) Act 2004 and Regulations 2005 • Work Health and Safety Act 2020
Relevant BlendED National Policies and Procedures	<ul style="list-style-type: none"> • Code of Conduct – Staff and Affiliates • Young Person Code of Conduct Agreement • Enrolment Agreement

Related Legislation, Policies and Procedures	
	<ul style="list-style-type: none"> Complaint Handling Guidelines and Procedures Records Management Policy Whistleblower Policy
Other Relevant Reference Documents, Websites and Forms	<ul style="list-style-type: none"> Complaint Handling Report Form (Assurance online) National Principles for Child Safe Organisations

Section 10 – Review

This policy will be reviewed annually, and amendments and updates made as required. Reviews may occur more regularly where a legislative or regulatory change requires it. Any related procedures, guidelines, or forms are also reviewed at least annually, or more regularly as required by change to legislation.

The BlendED National Policy Committee is responsible for ensuring that the annual review of this policy is undertaken, which includes applying any relevant legislative and/or regulatory changes, thorough consultation with relevant stakeholders, and having the policy reviewed and approved by the BlendED National CEO and Board.

Section 11 – Further Assistance

Policy queries should be directed to the Chief Operating Officer.

Document Control

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Policy Administration

Status	Document Owner	Approver	Approval Date	Version Number	Last Reviewed Date	Review Frequency	Next Review Date
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