

Complaint management procedure

This is a mandated procedure under the operational policy framework. Any edits to this page must follow the process outlined on the [creating, updating and deleting policy documents page](#).

Overview

The department promotes and values feedback and works to manage complaints to improve performance, systems and service delivery.

This procedure aims to:

- identify the key processes required to support staff (including corporate office staff, principals, preschool directors, education directors) to consistently and effectively manage feedback and resolve complaints
- clarify the roles and responsibilities of staff in complaint handling
- encourage and support where possible, the resolution of complaints at a local level by the original decision maker.

The complaint management procedure aligns with the [complaint management policy](#).

Scope

This procedure applies to all department staff including corporate office and preschools and schools.

The development and review of local procedure documents at a school or partnership level must be consistent with the [complaint management policy](#) and this procedure.



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Detail

The department endorses a 3 level approach to complaint handling recognised as best practice in the Australian Standard 10002:2022 Guidelines for complaint management in organisations (ISO 10002:2018, NEQ).

Level 1 complaint management – responsibilities of school, preschool and corporate office staff

Schools and preschools

Complaints are aimed to be resolved at the first (school and preschool) level wherever possible, before proceeding to [level 2 complaint management](#). Parents often approach teachers and support staff first with a concern or complaint, and staff should make every effort to achieve an early resolution where possible.

All school or preschool complaints received, and the decisions or actions taken to address the complaints, must be documented in the school complaints register and reported annually. Refer to the [recording complaints](#) section.

Customer Feedback staff will refer complaints back to the original decision maker and/or site leadership if they have not been raised or addressed at this level already. This gives the original decision maker an opportunity to explain their decision or action and attempt resolution. In circumstances where the original decision maker and/or site leader does not think it appropriate that they review or manage a complaint, contact is to be made with Customer Feedback to determine the best course of action.

School and preschool staff responsibilities

Parents should raise any concerns or complaints about their child's education with their child's teacher. It is expected that teachers will:

- acknowledge the complaint
- make a time available (face-to-face, by phone) as soon as reasonably possible to discuss with the parent/s their complaint
- consider relevant legislation, departmental policy and guidelines and school or preschool processes and/or seek advice from your site leader
- identify and discuss with the parent possible courses of action that could be taken to resolve their complaint and the timeframe for this to occur
- where practicable, follow up with the parents, after a reasonable period of time for any changes to take effect, to ensure that the parent is satisfied with the outcome. For example, at parent interview, telephone or email.
- if appropriate (depending on the nature of the concern or complaint) keep a written record of the complaint, its progress and outcomes (refer to the [recording complaints](#) section)

- if a parent is not satisfied with the outcome of the complaint management process or decides that it is more appropriate to discuss their complaint directly with a member of the leadership team, then the person hearing the complaint must follow up by scheduling a meeting or phone call with the school leader (if applicable).
- The [raising a complaint with the department \(PDF 232KB\)](#) brochure is mandated for use in all schools and preschools. This information must be easily accessible for parents:
 - on the department's website
 - on each school and preschool website
 - in the school or preschool administrative office.

Online staff training in complaints management and resolution for education sites is available on [plink \(login required\)](#).

For more advice refer to [appendix 1 – strategies for dealing with unreasonable customer conduct](#).

Concerns and complaints received by a staff member about another staff member or an issue outside their responsibility to resolve, must be reported to a member of their leadership team.

Refer to [resolving employee complaints and requesting reviews](#) (staff login required) for more information about employee complaints.

The [Incident Management Directorate](#) (staff login required) receives and assesses cases of suspected or alleged serious misconduct against department employees.

School leadership staff responsibilities

It's expected that when leadership staff handle a complaint they will:

- wherever possible, make every reasonable effort to resolve parent concerns or complaints at the local level in a timely and effective manner
- ensure that staff are familiar with the department's complaints policy and that school or preschool websites have a link to the policy and associated information including the [raising a complaint with the department \(PDF 232KB\)](#) process
- ensure staff understand the complaint process and are aware of and have access to appropriate training advise all relevant parties once a complaint has been received
- consider whether the parent may require a support person at a meeting, ensuring the complaint is documented and appropriate action determined
- recommend to the Education Director, any system improvements at a broader level that may reduce the likelihood of similar complaints
- seek advice and support from the Partnerships, Schools and Preschools Division, phone 8226 1290, refer to the [school and preschool complaints](#) page and contact Customer Feedback as required
- advise the parent of their right to contact Customer Feedback, if a resolution at the school or preschool can't be found.

Education Director responsibilities

In cases where a Principal or Preschool Director has exhausted all avenues at a local level, they may contact the Education Director for advice and support to resolve a complaint. If the matter is referred to the Education Director, the Principal or Preschool Director should ensure that they advise the parent when they will be next contacted.

The Education Director is responsible for managing:

- complaints relating to the conduct of the Principal or Preschool Director
- an escalation about enrolment issues where students are denied access to a school within their zone or a request for a review against a decision not to enrol a student into a school outside their zone, (refer to the [school and preschool enrolment policy \(PDF 286KB\)](#)). An Education Director may also refer enrolment issues to enrolment officers of the department, where applicable
- an escalation about a school decision to deny transport to a student and the decision has been confirmed in writing by the school to Customer Feedback. Customer Feedback will give this information to the Education Director via email and ask them to communicate their response to the parent or carer. For more information, refer to the [school transport policy \(PDF 895KB\)](#)
- grievances made in relation to the exclusion of a student from a school (for more information refer to [suspension, exclusion and expulsion of students procedure \(PDF 1.4MB\)](#) and the [behaviour support policy \(PDF 647KB\)](#))
- a matter Customer Feedback referred or escalated due to level of risk or sensitivity of the complaint, by negotiation.

Corporate offices

On receipt of a complaint, corporate office staff must ensure that a complaint record is completed outlining details about the matter including resolution. You can use the [corporate office complaint record template \(PDF 1.3MB\)](#) (staff login required).

Corporate office staff must make every effort to resolve complaints as soon as possible. Where required (for example if the customer is not satisfied that their matter has been addressed), provide customers with an appropriate escalation point. This could be to their line manager or executive.

Corporate office staff will record all complaints received on their own copy of a [corporate complaint register \(XLSX 64KB\)](#). If you're unsure of the process, actions or escalation options, contact Customer Feedback for advice on 1800 677 435.

Corporate office staff responsibilities

Corporate offices must have a process for managing complaints received in relation to their own business area. On receipt of a complaint, staff must:

- acknowledge the complaint within 2 business days and make a time as soon as possible (if unable at the time) to discuss the complaint further
- consider relevant legislation, departmental policy and guidelines

- identify and discuss possible courses of action that could be taken to resolve their complaint and the timeframe for this to occur
- if appropriate (depending on the nature of the concern or complaint) keep a written record of the complaint, its progress and outcomes
- if a customer is not satisfied with the outcome of the complaint management process or decides that it is more appropriate to direct their complaint to a member of the leadership team, then the staff member hearing the complaint is to provide escalation details.

Recording complaints

Each school, preschool and corporate business area must have a process for effectively and appropriately documenting complaints and the action taken to resolve the complaint.

[Site complaint records \(PDF 1.3MB\)](#) providing the parent's details and an outline of the complaint must be completed and documented on the [site complaints register \(XLSX 112KB\)](#) for schools and preschools.

For corporate staff, use the [corporate office complaint record template \(PDF 1.3MB\)](#) to record complaints. Actions taken and/or escalation details once the complaint is finalised must be recorded on the [corporate complaint register \(XLSX 65KB\)](#). Complaint registers must be kept in business units.

In instances when the complaint is easily resolved over the phone or by front line staff, recording of the issue may not be required. Staff may, however, wish to record a brief note of these issues and the resolution to monitor any potential ongoing issues or trends. If unsure, seek advice from your line manager or leadership staff.

Level 2 complaint management – responsibilities of Customer Feedback

If a customer is not satisfied that their complaint has been addressed after they have exhausted options at the school or preschool and with the Preschool Director or Principal, Customer Feedback is the next level contact.

Customer Feedback is responsible for:

- actively liaising with complainants, schools and preschools to help all parties to explore appropriate options for resolution, once all avenues to resolve have been exhausted at the local level
- providing advice on request to leaders regarding complaint management, resolution options and managing unreasonable conduct
- gathering, analysing and reporting on Customer Feedback complaint and feedback data.

Customer Feedback use 7 stages for central complaint management:

1. Receive and acknowledge

On receipt of a complaint to Customer Feedback an officer will:

- be allocated to a case
- contact the customer within 2 business days to confirm details of the complaint (or feedback) ensuring it is clearly understood and:
 - explain the complaint process (including approximate timeframes)
 - clarify what the outcome sought is
 - advise when they will likely hear back from the officer.

2. Assess

The Customer Feedback officer will consider:

- whether the complaint falls within scope of the complaint management policy or needs to be redirected elsewhere
- whether reasonable efforts (as outlined in the [school and preschool staff responsibilities](#) section) have been made to resolve the complaint at the local level in the first instance, and if not, refer the customer to the school/preschool for resolution
- whether the determination at the school/preschool level is consistent with department policy and procedure
- whether there are factors that should raise the priority of the complaint or there are timeframes that cannot be altered
- the outcome sought and determined if this is reasonable. If necessary, an alternative solution will be discussed.

3. Plan

The Customer Feedback officer will:

- identify whether the resolution needs to be managed by another division
- note any special considerations that apply to the complaint, for example sensitive information and/or special supports required
- seek cultural advice if necessary
- estimate the time it may take to resolve the complaint
- identify steps involved and who more information should be requested from.

4. Gather and review information

The Customer Feedback officer will:

- weigh up facts and contentions in support of a complaint
- access and collect timely information from school, preschool, education office, divisions and other relevant sources.

- Customer Feedback must receive requested information **within 3 days** to enable a timely response, within policy timeframes to the customer, unless negotiated otherwise
- review the steps taken by the school/preschool to resolve the complaint, confirming compliance with departmental policies, procedures and regulatory framework
- apply confidentiality and privacy obligations
- update the customer on steps and provide an opportunity for comment
- seek advice from the Customer Feedback Manager on complex and sensitive matters. The Customer Feedback Manager will assess and escalate matters to appropriate business areas and executives as needed.

5. Response and resolution

The Customer Feedback officer will:

- provide progress reports to customers, within 5 working day periods, particularly if there are any delays
- apply specialised communication and negotiation techniques, if deemed appropriate.
- aim to inform customers of the outcome to their complaint within 20 working days. Where this cannot occur due to the complexity of the matter or other extenuating circumstances such as school closures or failure to receive requested information on time, the customer is informed and provided with regular updates
- provide, in writing or verbally, a clear response to all parties involved explaining the assessment and final outcome.
- inform relevant Principal or Preschool Director or Education Director involved, when matter is closed.

Requests for the [facilitation of a meeting between the school and the parent](#), must be forwarded in writing from either the parent or school leader to the Manager Customer Feedback for consideration. Current concerns must be outlined between parties, why facilitation by Customer Feedback staff may be effective in this situation, and type of resolution sought.

6. Options for redress

The Customer Feedback officer will advise the customer of their escalation options if they are not satisfied that their matter has been addressed. This could include an [internal or external review process](#).

7. Systemic issues

The Customer Feedback officer will:

- ensure recording is accurate and timely for reporting purposes
- identify and record the case topic and causal factor to support the improvement of policies, practices and identification of common system and specific site complaint patterns.

When the subject of feedback or a complaint from a customer is about an executive or Customer Feedback, the matter may be forwarded by email to education.complaints@sa.gov.au for the attention of the Customer Feedback Manager. The Customer Feedback Manager will assess the complaint and forward to the appropriate senior executive for follow up and/or action.

Customer Feedback is not a disciplinary or investigative body. Customer Feedback does not resolve complaints directly related to a corporate office.

Level 3 complaint management – role of Ombudsman SA (OSA)

If a customer is not satisfied with the outcome of their complaint after exhausting level 1 and level 2 avenues within the department, they must be provided with the option to contact and seek advice or independent review from the [Ombudsman SA](#) or another appropriate external body. This may include the [Education Standards Board](#) or the [Teachers Registration Board](#). The circumstances of the complaint will determine whether these options are available.

Roles and responsibilities

Senior Executive Group

Ensure the establishment, maintenance and promotion of an effective and impartial feedback and complaints management system.

Ensure there is a process for regular reporting and to regularly review reports.

Support and link recommendations arising from analysis of complaint handling data in program/policy review and service delivery to improvements.

Leadership staff

Ensure the promotion of an effective feedback and complaint management system. Ensure corrective action is taken and recorded within area of responsibility.

Support staff members to respond effectively to complaints.

Consider complaint data and systemic issues as part of strategic planning.

Director, Customer and Information Services

Promote a positive culture that values complaint handling.

Integrate feedback and complaint information to support evaluating existing systems or implementing new processes.

Monitor and analyse complaints data.

Report to senior executives to ensure transparency and public accountability.

Ensure continuous training and proper support is available to feedback and complaint handling staff.

Manager, Customer Feedback

Provide high-level leadership, direction and effective operational management to Customer Feedback.

Provide regular staff supervision. Support, recognise and reward good complaint handling by staff.

Liaise with external and internal key stakeholders on complex and sensitive customer feedback and complaint matters.

Provide high-level policy and operational advice on complaint handling to directors and executives.

All staff

Ensure that they are familiar with the complaint management system and local complaint procedures. Help customers who wish to make complaints and document as per school/department processes.

Definitions

complaint management system

Encompasses all aspects of the policies, procedures, practices, staff and infrastructure used by the department in the management of complaints.

complaint

An expression of dissatisfaction made to or about an agency, relating to its products, services, employees or the handling of a complaint, where a response or resolution is explicitly or implicitly expected or legally required.

Customer Feedback

Manages level 2 complaints made by a parent, carer or community member who is directly affected by a decision or action taken by a school or preschool.

customer

Parent, carer or community member directly affected by a decision or action of the department.

enquiry

A request for information or assistance, where a response is expected, without an expression of

dissatisfaction about a service or action.

facilitation

Third-party action between conflicting parties to promote reconciliation or compromise.

feedback

An opinion, comment or expression of interest or concern, made directly or indirectly to or about the agency, about its products, services, employees or its handling of a complaint. A response is not explicitly or implicitly expected or legally required. Feedback can be either positive or negative.

leadership staff

Preschool Director, Principal, Deputy Principal, delegated site leader, Supervisor, Manager, Director, member of leadership group.

original decision maker

The employee who made the original decision.

Ombudsman of South Australia (OSA)

An independent agency that investigates complaints made about government agencies.

Supporting information

[Raising a complaint with the department \(PDF 232KB\)](#)

Related legislation

[Children and Young People \(Safety\) Act 2017 \(SA\)](#)

[Education and Children's Services Regulations 2020 \(SA\)](#)

[Education and Early Childhood Services \(Registration and Standards\) Regulations 2011 \(SA\)](#)

[Freedom of Information Act 1991 \(SA\)](#)

[State Records Act 1997 \(SA\)](#)

[Teachers Registration and Standards Act 2004 \(SA\)](#)

Related policies

[Department of the Premier and Cabinet Circular PC012: Information Privacy Principles \(IPPs\) Instructions](#)

[Assault, weapons, sexual, drug and other offences reported onsite – site responsibilities procedure \(PDF 238KB\)](#) (staff login required)

[Complaint management policy](#)

[Employee complaints procedure \(PDF 421KB\)](#) (staff login required)

[Managing protections for teachers, staff and students procedure \(PDF 262KB\)](#) (staff login required)

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Contact

Customer Feedback

Phone: 8226 1000

Free call: 1800 088 158

Email: education.customers@sa.gov.au

Appendix 1 – Strategies for dealing with unreasonable customer conduct

What is unreasonable conduct?

Unreasonable conduct is behaviour, which because of its nature and frequency, raises substantial health, safety, resource or equity issues for those involved. Dealing with unreasonable conduct can have profound effects on efficiency levels and the productivity and wellbeing of staff.

Unreasonable complainant conduct can be divided into 5 broad categories:

- unreasonable persistence
- unreasonable demands
- unreasonable lack of cooperation
- unreasonable arguments
- unreasonable behaviours (including extreme anger, aggression and threats).

Strategies for managing unreasonable conduct

The following strategies may help staff manage unreasonable complainant conduct.

In the case of:

- Unreasonable persistence:
 - repeat the same word or short phrase over and over until the customer hears and processes your message
 - make it clear that the matter is finalised
 - avoid the customer re-framing the complaint to keep the matter alive unless there are significant new issues
 - request for the behaviour to stop.
- Unreasonable demands:
 - set limits about what can be done, for example what issues will be followed up, by whom and how communication will occur
 - be clear in advance what resolution is practical and can be achieved
 - end telephone calls that are unproductive with a warning first
 - if applicable, explain that an immediate response is not possible and provide rationale

- be clear that the department decides how the complaint should be handled (in that the department and staff own the complaint, the complainant owns their issue)
- advise that assessments and follow ups are based on facts (not rumours, emotions or gossip).
- Unreasonable lack of cooperation:
 - set limits before proceeding with the matter
 - request customer to define what their issues are or summarise information before the complaint will be looked at and specify a timeframe
 - clearly state that a particular outcome is not possible
 - acknowledge that the customer views the situation differently. However, based on the information you have, you have formed a different viewpoint.
- Unreasonable arguments:
 - decline or discontinue progressing the matter
 - reflect back to customer what has been said
 - advise that you must be provided with clear and tangible evidence to support the claim
 - if unreasonable issues are mixed with reasonable, ensure that they are clearly identified and separated and only deal with the reasonable ones.
- Unreasonable behaviour:
 - advise threats are unacceptable and may be reported to police
 - use non-threatening words and a calm tone
 - try to refocus attention on the issue or an action, move the customer from an 'emotional' state to a 'thinking' state
 - advise inappropriate communication will not be responded to. Request customer to reframe their complaint in more moderate or respectful terms
 - warn that behaviour is unreasonable and if conduct continues, the call or meeting will be terminated
 - end the call if behaviour continues to be unreasonable. Advise your leader of this action.

Avoiding escalating conflict

Use a non-confronting, non-resistant communication style.

- Find something to agree with, without necessarily agreeing with the complainant's point of view. For example 'I agree that not hearing back from ... would be very annoying'.
- Acknowledge feelings and actions. For example 'I can hear that you are very upset about this'.

- Be careful about saying, 'I understand'. Saying it about the information conveyed is okay, but about the complainant's situation is probably not okay.
- Listen with interest, engage and repeat key words back.
- Clarify, get more information, do not interpret or assume.
- Check understanding. For example 'as I understand it, the situation is is this correct?'
- Do not argue or debate. State your position. For example 'I can see that you believe ... We have come to a different conclusion'.
- Be careful about justifying or denying. Only do this if it's necessary to clarify the departments position or action.
- Let the complainant know if there has been a mistake, omission or delay and explain how the situation will be rectified.
- Remain calm, no matter how the complainant behaves. Set limits when rudeness, anger and aggression transgress your personal boundaries.

Referring customers to another business unit or agency

It's not helpful to refer a customer to another agency or area of the department if their behaviour is unreasonable and they are not able to clearly articulate the outcome or the issue they want to raise. Referrals should only occur when the customer is able to discuss their concerns clearly and calmly.

For example, you may want to suggest to a caller that you'll call them back at a pre-arranged convenient time. This will give them time to process the information that you've given them. Alternatively, with their agreement, you might want to give their details to the appropriate business area for them to return the call within the next 24 or 48 hours.

In some instances you may not be able to refer the caller and you'll need to terminate the call.

Staff support and debriefing

After a difficult or complex discussion with a complainant, it's important for the officer involved to debrief either formally or informally depending on the severity of the issue. In some instances this may involve the officer talking through the situation with a work colleague or their manager to help process the discussion and actions taken in an informal environment.

For other situations a more formal debriefing may be necessary and this may be at the request of the officer themselves or as a referral by their line manager if they are concerned for the officers health and wellbeing. Formal debriefing can be undertaken with a line manager who has capacity to deal with such matters or via an appointment with the EAP or other professional health provider.

External professional support service is available to all staff by contacting the [Employee Assistance Program](#).

Complaint handling training

Complaint handlers can benefit from:

1. online staff training in complaints management and resolution for education sites available on [plink](#)
2. understanding the department's [complaints management policy](#) and procedure and local processes in place
3. discussing any complaint training requirements with a line manager or leader.

Customer wellbeing concerns

Where a customer making a complaint expresses thoughts of suicide or other self-harm, the matter should immediately be reported to the Mental Health Triage Service/Assessment and Crisis Intervention Service by phoning 131 465.

If there is any doubt about reporting the matter, staff should speak with their leader. Staff must follow the [Information Sharing Guidelines for promoting safety and wellbeing](#) when sharing information so that risks are appropriately understood, managed and documented.