



Bacchus Marsh
Grammar

School POLICY

CHILD PROTECTION AND SAFETY

Child Safe Complaints Management Policy and Procedures

Approved by the School Principal: 18 November 2025

Bacchus Marsh Grammar PO Box 214 Bacchus Marsh VIC 3340 **E** school@bmg.vic.edu.au
Maddingley Campus South Maddingley Road, Bacchus Marsh VIC 3340 **P** 03 5366 4800
Woodlea Campus and ELC 111 Frontier Avenue, Aintree VIC 3336 **P** 03 5366 4900

An Independent Ecumenical School
for Girls and Boys
Reg. No. 1919
ABN: 24 128 531 078
www.bmg.vic.edu.au

Child Safe Complaints Management Policy and Procedures

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1 Introduction

For the purposes of this Policy, we refer to School Staff, Volunteers or Contractors together as “Staff” or “staff members”.

2 Key Definitions

2.1 Child Abuse

2.1.1 For the purposes of this Policy, “child abuse” includes:

(a) all types of child abuse, namely:

- (i) a sexual offence committed against, with or in the presence of, a child, whether or not a criminal proceeding in relation to the offence has been commenced or concluded;
- (ii) sexual misconduct, committed against, with or in the presence of, a child;
- (iii) physical violence committed against, with or in the presence of, a child;
- (iv) any behaviour that causes significant emotional or psychological harm to a child;
- (v) significant neglect of a child.

2.2 Child Safe Complaint

2.2.1 A “child safe complaint” refers to any complaint, concern, allegation or disclosure made to the School about something that may be a risk to, or act of harm/abuse against a child or young person.

2.2.2 A complaint can be made by, or can be in relation to, anyone including a child or student, former student, parent/guardian, other family member, staff member, volunteer, contractor, service provider, visitor or member of the wider community.

2.3 Child Safe-Related Complaint

2.3.1 For the purposes of this Policy, a “child safe-related complaint” includes any disclosure, allegation, suspicion, concern or internal report of:

- a breach of the School’s Child Safe Codes of Conduct
- a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the School or a School event
- Reportable Conduct
- other staff misconduct (such as a procedural breach of the Child Safe Program)
- any complaint about the School’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with our procedures for Responding to and Reporting Child Safety Incidents or Concerns.

3 Background

3.1.1 Under Standard 7 of the Victorian Child Safe Standards, the School must have and implement child-focused processes for managing complaints and concerns. To meet this Standard, Ministerial Order 1359 requires Bacchus Marsh Grammar School Board to (among other things):

- develop a complaints handling policy that meets a number of specific elements and that clearly outlines:
 - the process for making a complaint about the School, or the behaviour of any person within the School
 - the roles and responsibilities of leadership, school staff, and Volunteers in relation to complaints handling
 - the process for dealing with different types of complaints, breaches of relevant policies or the Child Safety Code of Conduct, and obligations to act and report
- have policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and cooperating with law enforcement

- ensure that record keeping, reporting, privacy and employment law obligations are met when responding to complaints and concerns
 - have a clear procedure or set of procedures for responding to complaints or concerns relating to child abuse
 - ensure that complaints are taken seriously and responded to promptly.
- 3.1.2 A child-focused complaints handling process is important for helping students and others at the School make complaints, whether about child safety wellbeing or otherwise. This Policy supports the creation of a culture for students and their families to have their complaints heard, considered and responded to, and a culture of transparency in our complaints management processes.
- 3.1.3 It sets out how the School, as a child safe organisation:
- has and implements a child-focused complaints handling system
 - manages child safe-related complaints
- 3.1.4 This Child Safe Complaints Management Policy is communicated to and understood by students, Staff and parents/guardians, and ensures that child safe-related complaints are handled in a timely, fair and transparent manner.
- 3.1.5 This Policy is summarised in the School's public-facing Child Safe Program Quick Reference Guide. In the School's public-facing Complaints Handling Policy, details are included about how to make a Child Safe complaint.
- 3.1.6 A child-friendly version of this Policy is also provided to students.

4 Child-Focused and Culturally Safe Complaints Handling

- 4.1.1 The School's system for handling complaints that involve students (whether as complainant, victim, witness or person being complained about) is child-focused, and follows the National Office for Child Safety's Complaint Handling Guide: Upholding the rights of children and young people and the Commission for Children and Young People's Including Children and Young People in Reportable Conduct Investigations resources.
- 4.1.2 The School's system for handling complaints that involve students (whether as complainant, victim, witness or person being complained about) is culturally safe. The School consults with relevant communities (the variety of communities that are relevant to the School, such as Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities, and other communities that make up its Staff and student cohort) about how to enable, support and respond to complaints in a culturally sensitive way.
- 4.1.3 In responding to child abuse complaints, the School will take particular measures in response to child safety incidents or concerns about an Aboriginal or Torres Strait Islander student, students from a culturally and linguistically diverse background, students with disability, and other vulnerable students (such as students who are unable to live at home or students who identify as lesbian, gay, bisexual, transgender or intersex).

5 Responsibilities for Child Safe Complaints Management

- 5.1.1 The Principal is responsible for ensuring the efficient and effective organisation, management and administration of the School's complaints handling processes.
- 5.1.2 All Staff are responsible for:
- responding appropriately to a student who raises or is affected by a child safe-related complaint
 - understanding their internal and external reporting requirements relevant to child safe-related complaints and for complying with this Policy.
- 5.1.3 Child Safety Officers and the Principal are responsible for:
- providing assistance and advice to Staff about their obligations under this Policy
 - ensuring that the School takes all child safe-related complaints seriously, and escalates, reports and responds to these appropriately

- ensuring that the School responds appropriately to a student who raises or is affected by a child safe-related complaint
- promptly and thoroughly managing the School's response to child safe-related complaints as set out below
- monitoring the School's compliance with this Policy.

5.1.4 Where a particular child safe-related complaint involves the Principal and they therefore cannot perform the above roles, the Company Secretary undertakes these responsibilities.

6 Making a Child Safe-Related Complaint

6.1.1 The School has developed complaints handling processes, to enable:

- simple and appropriate avenues for students, Staff, parents/guardians and the wider community to make a complaint, including child safe-related complaints confidentiality and accessibility for all members of the School community.

6.1.2 Anyone can, at any time, make a child safe-related complaint to:

- the Principal
- a Child Safety Officer
- a trusted staff member
- anonymously via the online Complaints Form available at www.bmg.vic.edu.au or via the secure drop box at Reception.

in person, in writing, over the phone or via the School's online complaints form at www.bmg.vic.edu.au.

6.1.3 Non-child safe-related complaints should be made to the Complaints Manager by emailing complaints@bmg.vic.edu.au or by completing the School's online Complaints form at www.bmg.vic.edu.au.

6.2 Parents/Guardians, Family Members and Other Community Members Complaints

6.2.1 **Parents/guardians, family members and other community members** who have child safe concerns or who wish to make a child safe-related complaint about the School, its students or staff members can contact:

- the School's Senior child safe Officer, Ros Pittard, by phoning (03) 5366 4800 or emailing pittardr@bmg.vic.edu.au,
- the Principal, Debra Ogston by phoning (03) 5366 4800 or emailing principal@bmg.vic.edu.au; or
- if the concern relates to the Principal, the Company Secretary – Greg Gough by phoning (03) 5366 4800 or emailing business@bmg.vic.edu.au.

6.3 Student Complaints

6.3.1 **Students** have multiple pathways to make a complaint, including child safe-related complaints, at the School. These include:

- disclosing child safety incidents or concerns, including abuse or other harm of themselves or of any other child or student aged 18 or over, to any staff member. This might be done:
 - verbally
 - in writing
 - online via the School's Complaints form at www.bmg.vic.edu.au
 - through electronic means (such as email). Should students wish to email their complaint to the School, they can do so by emailing the below staff:
 - Senior Child Safe Officer Ros Pittard: pittardr@bmg.vic.edu.au
 - Head of Maddingley Campus Andrew Pate: patea@bmg.vic.edu.au
 - Deputy Head of Maddingley Campus Lisa Foster: fosterl@bmg.vic.edu.au
 - Head of Woodlea Campus Danielle Copeman: copemand@bmg.vic.edu.au
 - Deputy Head of Woodlea Campus Sarah Hunter: hunters@bmg.vic.edu.au

Should a student wish to email a staff member not listed above, they should speak with their teacher or trusted staff member to obtain additional email addresses.

- indirectly (such as in written assignments, in artworks or in any other way)
- using the School secure drop box which is located at Reception to disclose child safety incidents or concerns, including abuse or other harm of themselves or of any other child or young person, anonymously.
- by contacting:

Kids Helpline Ph: 1800 55 1800
website: <https://kidshelpline.com.au>
Police: 000

7 Responding to a Child Safe-Related Complaint

7.1 Support for Complainants

- 7.1.1 Whenever a staff member receives a complaint containing information about child safety incidents or concerns, the staff member must offer the complainant and any student involved in the complaint (if they are not the complainant) age and culturally appropriate support and assistance under the School's Support Following Child Safety Incident or Disclosure policy. The School will also support students, families and relevant Staff involved in a child safe-related complaint as set out in that policy.
- 7.1.2 Where the complaint relates to a sexual offence or sexual misconduct that occurred before 1 July 2018, complainants must be informed about the National Redress Scheme for people who have experienced institutional child sexual abuse. The process for applications involving the School can be found in the Principal's Office.

7.2 Internal and External Reporting

- 7.2.1 All Staff must follow the School's Procedures for Responding to and Reporting Child Safety Incidents or Concerns if any information contained in a complaint that is made to them raises a concern that a student may have been subject to, or may be at risk of, abuse or other harm at the School or a School event, or from a staff member. This includes in particular:
 - Reporting a Child Safety Incident or Concern Internally
 - Duty to Protect/Failure to Protect
 - Mandatory Reporting to Child Protection
 - Non-Mandatory Reporting to Child Protection
 - Reporting to Police
 - Reportable Conduct
 - Reporting Teacher Misconduct to the Victorian Institute of Teachers
- 7.2.2 The School's internal reporting and Reportable Conduct policies require all Staff to report any child safe-related complaint that is made to them to a Child Safety Officer or the Principal in addition to making any required external reports. If a complaint is about the Principal, the complaint must be referred to the delegate.

8 How the School Manages Child Safe-Related Complaints

The School manages child safe-related complaints as follows:

Child safe-related complaints that involve, or raise the possibility of a risk of, child abuse or other harm to a child are managed under the School's Child Safe Program.

- 8.1.1 The following child safe-related complaints must be managed pursuant to any relevant policies and procedures in the Schools Child Safe Program:
 - 1. complaints involving, or raising the possibility of a risk of, child abuse or other harm occurring at the School or a School event, or by a staff member, Volunteer or Contractor

2. complaints alleging a breach of the Child Safe Codes of Conduct that involves, or raises the possibility of a risk of, child abuse or other harm by a staff member, Volunteer or Contractor.
- 8.1.2 The above kinds of child safe-related complaints in Section 8.1.1 must be immediately referred to the Principal (or if the complaint involves the Principal, the delegate) to be managed pursuant to relevant policies and procedures in the School's Child Safe Program.
- 8.1.3 The Principal may, where appropriate, delegate management of these kinds of child safe-related complaints to a Child Safety Officer.
- 8.1.4 Relevant policies and procedures for managing child safe-related complaints listed on Section 8.1.1 include, but are not limited to, Reportable Conduct, Reporting Teacher Misconduct to the Victorian Institute of Teaching, Mandatory Reporting to Child Protection, Reporting to Police and Duty to Protect/Failure to Protect.

9 Other child safe-related complaints that are managed under the Child Safe Program

- 9.1.1 The following child safe-related complaints must also be managed pursuant to any relevant policies and procedures in the School's Child Safe Program:
 1. complaints about the School's investigation of and/or response to a specific incident of or concern about child abuse and other harm to a child
 2. complaints that the School, when responding to a specific incident of, or concern about, child abuse and other harm to a child, has not correctly followed the School's own policies (for example, a complaint that we did not follow our Reporting Teacher Misconduct to the Victorian Institute of Teaching or Reportable Conduct policies)
 3. complaints that the School has not correctly followed legislative or regulatory requirements regarding child safe in relation to a specific incident of, or concern about, child abuse or other harm to a child (for example, a complaint that we shared information about a child safety incident or concern with an external agency when not permitted by law to do so).
- 9.1.2 These kinds of child safe-related complaints must be immediately referred to the Principal (or if the complaint involves the Principal, the delegate) to be managed pursuant to relevant policies and procedures in the School's Child Safe Program.
- 9.1.3 The Principal may, where appropriate, delegate management of these kinds of child safe-related complaints to a Child Safety Officer.
- 9.1.4 Relevant policies and procedures for managing these kinds of child safe-related complaints include, but are not limited to, Disciplinary Actions (Child Safe), Child Safe Program Breach Management and Regular Reviews and Continuous Improvement.

10 Child safe-related complaints that may be managed under other School policies and procedures

- 10.1.1 The following child safe-related complaints may be managed pursuant to other relevant School policies:
 1. complaints alleging a breach of the Child Safe Codes of Conduct that do not involve, and do not raise the possibility of a risk of, child abuse or other harm to a child by a staff member, Volunteer or Contractor (for example, a complaint that a staff member has expressed personal views on sexuality in the presence of students)
 2. complaints alleging procedural breaches of the Child Safe Program by Staff that do not involve, and do not raise the possibility of a risk of, child abuse or other harm to a child (for example, a complaint that a staff member has not renewed their WWC clearance)
 3. general complaints about our Child Safe policies and procedures themselves (for example, a complaint that our policies and procedures do not accurately reflect the law or that they do not take into account the needs of a particular student or community cohort).
- 10.1.2 Although these kinds of child safe-related complaints may be managed pursuant to other relevant School policies, the Complaints Manager or other person managing the complaint should – where appropriate – consult with a Child Safety Officer as part of the investigation.

- 10.1.3 With respect to 3. above, given the high risk to the School of not having a compliant Child Safe Program, it is likely that the outcome of these kinds of complaints will need to be reported to the School Board.
- 10.1.4 Relevant policies and procedures for managing these kinds of child safe-related complaints include, but are not limited to, our Complaints Handling Program and/or our Human Resources policies and procedures.

11 Guidance and Resources for Managing Child Safe-Related Complaints

- 11.1.1 The Complaints Handling Program provides guidance on complaints handling principles and a step-by-step guide to managing a complaint.
- 11.1.2 The National Office for Child Safety publishes a guide for complaints that involve children and young people: Complaint Handling Guide: Upholding the rights of children and young people.
- 11.1.3 The School's Reportable Conduct and Reporting Teacher Misconduct to the Victorian Institute of Teaching policies set out procedures that will be followed for complaints about inappropriate conduct by Staff.

12 Reviews of Child Safe-Related Complaint Outcomes

12.1 Internal Reviews

- 12.1.1 Complainants or other persons who are involved in the child safe-related complaint (for example, a staff, member whose behaviour is the subject of the complaint, a student who is the victim of the alleged behaviour or the parent/guardian of a student involved in the complaint) and who are not satisfied with the management of a child safe-related complaint or its outcome may request an internal review of:
 - the procedures undertaken
 - findings made
 - disciplinary actions proposed or taken
 - other outcomes (including a decision not to make a finding or to take disciplinary or other action).
- 12.1.2 Requests for internal reviews should be made to the Principal and / or the Senior Legal Counsel.

13 Record Keeping about Child Safe-Related Complaints

- 13.1.1 Because of the confidentiality and privacy issues that arise with respect to child safe-related complaints, records of complaints that contain information about child safety incidents or concerns are not held within our general complaints handling record keeping system.
- 13.1.2 Child safe-related complaints are instead recorded under our Child Safe Record Keeping policy.
- 13.1.3 Child safe-related complaints are also recorded in a separate Child Protection Complaints Register.

14 General Reviews of Child Safe Complaints Management

- 14.1.1 The School regularly reviews child safe-related feedback, comments and complaints to ensure that any child safety-related feedback, comments or complaints from the School community members and relevant stakeholders are captured, analysed and acted on where appropriate.
- 14.1.2 In particular, the School and the Grammar School Board regularly analyse child safe-related complaints to identify causes and systemic failures to inform continuous improvement.
- 14.1.3 The School's Child Safe Complaints Management Policy is also itself regularly reviewed as part of the School's review of its Child Safe Program.

15 Related Documents

Child Safe Policy
Child Safe Program Quick Reference Guide
Child Safe Record Keeping Policy
Child Safe Responding and Reporting Obligations and Procedures
Child Safe Standards Toolkit
Complaints Handling Policy
Mandatory Reporting to Child Protection Policy
Staff and Student Professional Boundaries Policy
Student Child Safe Code of Conduct

16 Authorisation

School Document Name	Child Safe Complaints Management Policy and Procedures	
Approval Authority	CEO	
Approval Signature	Andrew Neal CEO Bacchus Marsh Grammar	
Administrator	Company Secretary	Greg Gough
Approval Date	18 November 2025	
Date of Next Review	18 November 2026	To be reviewed annually

17 History

Date	Amendment
25 September 2025	1. New policy
18 November 2025	2. Updated to include types of abuse and updated the complaints process