

### Background

Clear, respectful, and consistent communication between centres and families is fundamental to building trust and the provision of quality early childhood education and care programs. Centres will actively foster a culture of openness, where feedback from families is encouraged, valued, and regularly shared. Managing complaints in a fair and transparent manner is essential to enable continuous improvement.

Our complaint management process is child-centred and guided by principles of social justice, inclusion and respect for the diverse identities and lived experiences of all individuals, particularly Aboriginal and Torres Strait Islander peoples, culturally and linguistically diverse children and families, and those requiring additional support. When needed, complainants are encouraged and supported to access the [National Relay Service](#) or [Translating and Interpreting Service \(TIS National\)](#).

C&K is dedicated to fostering inclusive and supportive learning environments where every child feels safe, respected and empowered to speak up if they feel unsafe or unhappy. All complaints raised by children are treated seriously and responded to with care, sensitivity and timely action.

C&K's commitment to child safety and protection aligns with the [Queensland Child Safe Standards](#), and the [Universal Principle for Cultural Safety](#). This procedure aligns with Standard 2: Voice of Children and Standard 6: Complaints Management.

This procedure is implemented alongside the [Complaint Management Policy](#), [Child Centre Incident Reporting Procedure](#), [Managing Complaints Relating to Child Sexual Behaviour Procedure](#), [Whistleblower Policy](#) and the [Child Protection and Safety Definitions and Indicators Guideline](#).

The following types of complaints fall **outside** the scope of this procedure:

- Complaints made by a C&K employee about another employee are considered grievances and managed in accordance with the [Employee Grievance Procedure](#).
- Privacy complaints are managed in accordance with [Privacy Policy](#).
- Complaints from external parties concerning the professional conduct of or services provided by C&K Central employees.

### What is a complaint?

A complaint is any expression of dissatisfaction or concern (verbal or written) regarding:

- The education and care provided at a C&K centre, including but not limited to an alleged circumstance posing a risk to the health, safety and/or wellbeing of a child.
- An incident, allegation, disclosure or complaint of child harm (i.e. physical abuse, sexual abuse, including grooming, emotional abuse or neglect) and use of inappropriate discipline occurring at a C&K centre.
- The conduct of a C&K employee.

### Who can make a complaint?

Complaints may be made by any individual (who is not a C&K employee) including not limited to a child, parent, guardian, visitor, student, volunteer, external contractor or a member of the community. These individuals are collectively referred to as a complainant.

Complaints can remain anonymous, but it does help if we can contact them for more details.

Children are supported to speak up and speak out about anything that makes them feel unsafe or worried and educators regularly remind children that they can speak with a trusted adult.

### Notifying Statutory Bodies

Depending on complaint type and assessed risk level, external regulatory bodies may need to be notified. Complainants will be advised that, while C&K will take all reasonable efforts to ensure confidentiality, it may be necessary for C&K to make disclosures in circumstances where it is reasonably required in order to conduct a proper investigation or where C&K is required to make disclosure to an external regulatory body.

### Privacy and Confidentiality

- Maintaining privacy and confidentiality when making, escalating and management complaints is essential. Complaints often involve personal and sensitive information, and it is vital to protect the dignity, safety, and rights of everyone involved. Information should only be shared with authorised individuals and relevant authorities responsible for managing and/or investigating the concern.
- Don't discuss the matter with anyone who does not have a legitimate role in the process.
- Upholding confidentiality ensures trust, fairness, and the integrity of any investigation or response.

## C&K Complaints management approach

C&K complaints management approach demonstrates a commitment to open and timely communication, listening with care and respect, taking all concerns seriously and working together to resolve concerns. To ensure effective and timely resolution of complaints, the Centre Director/Nominated Supervisor will work with complainants to resolve concerns. Where necessary, a Centre Director/Nominated Supervisor will be supported by C&K support teams including their Early Childhood Education Manager to effectively resolve concerns.

### Complaints Management Approach at a glance

#### Our Commitment

We are committed to open and timely communication, listening with care and respect, taking all concerns seriously, following required regulatory processes, and working together to resolve issues.

#### Communication

We value communication as a key strategy to support effective management of complaints.

#### Let us know right away

If something doesn't feel right, please let us know. Raising concerns right away helps us understand and respond quickly.

#### We Listen

We will create the time and space to listen carefully to what you are telling us. Your experience, feelings, and perspective matter.

#### We seek to understand

What happened, what impact it had and what outcome is important to you.

#### Regulatory Notification

Some concerns must be reported to the relevant regulatory authority. If this is required, we will explain what this means and what will happen next.

#### Reviewing Your Concern

Some concerns can be addressed quickly. Others may require us to gather more information and speak with others involved. We will keep you informed about what is happening and any expected timeframes.

#### Moving Forward Together

We aim to agree on clear next steps, keeping you informed, and working towards a fair and respectful outcome.

## Complaint Management Process

### 1. Raising a Complaint

#### The complainant will:

- In the first instance, speak with the Centre Director/Nominated. If the matter relates to the conduct of the centre Director, speak with centre's C&K Early Childhood Education Manager. Contact details displayed in centre foyer, on centre profile.
- Share their concerns in a respectful manner. As outlined in the *C&K Parent and Community Code of Conduct*, the use of inappropriate, threatening, aggressive or abusive language and gestures, including swearing, yelling or throwing items, is not permitted.
- If the complaint is not satisfactorily resolved at the centre level, speak with centre's C&K Early Childhood Education Manager. If the complaint remains unresolved:
  - Contact C&K's Central Office on 3552 5300 OR [feedback@candk.asn.au](mailto:feedback@candk.asn.au)
  - Complete a [C&K online feedback form](#).
- Complainants may also contact the regulatory authority for the Qld early childhood education and care sector (Early Childhood Education Care) on 13 74 68 or [ecec@qed.qld.gov.au](mailto:ecec@qed.qld.gov.au).

### 2. Immediate response

#### Employee will:

- Actively listen and respond without judgement, in a professional and respectful manner.
- Ensure a culturally safe space is provided.
- Respectfully advise an alternate suitable place or time (i.e. non-contact or outside program time), when confidentiality cannot be maintained or focusing your attention on the complainant may compromise the safety and active supervision of children and/or to consider if an alternative space would provide greater cultural safety.
- Ask questions to clarify or improve your understanding of the complaint.
- Avoid being defensive or dismissive of complaint raised.
- Attempt to diffuse emotions by acknowledging what they are feeling, and state positively that you wish to seek a solution to the issue that is causing concern.

- Seek to understand and clarify complaint details including:
  - complainant(s) name, and if applicable, child's name and C&K employee involved/mentioned in the complaint
  - complaint location, activity, date, and time
  - why is the complainant dissatisfied
  - how the complainant has been impacted
  - any supporting information. A complainant may provide supporting information such as documents, photos, videos, and/or audio recordings. Images or recordings of children undressed, or genitalia exposed cannot be shared.
  - what outcome the complainant is seeking (Ask: *What outcome do you seek?*)
- Outline the option of putting their complaint in writing to the centre's email address, [feedback@candk.asn.au](mailto:feedback@candk.asn.au) or by completing the [C&K Online Feedback Form](#).
- Outline the importance of maintaining privacy and confidentiality at all times.
- Promptly make a written record of a verbal complaint via a Complaint Record. If complaint is raised by an enrolled child, complete a Child, Centre Incident Record.

### 3. Assess and escalate complaint

**As soon practical, within 24hrs from receipt of complaint**

#### Employee will:

- As soon as practical, immediately notify the Centre Director/Nominated Supervisor or Responsible Person in Charge.

#### Centre Director/Nominated Supervisor or Responsible Person in Charge will:

- Assess complaint risk using the C&K Risk Matrix outlined in [appendix one](#).
- Immediately notify their Early Childhood Education Manager (ECEM) or if unavailable, notify their Regional Manager (RM) of complaints assessed as moderate or high-risk.
- Lodge moderate or high-risk complaints on the Online Feedback Form with attached record of complaint and any other supporting documents. Upon submission of this form, the complainant will receive an automated email acknowledgment, including a complaint reference number.
- Maintain privacy and confidentiality at all times.

#### Early Childhood Education Manager will:

- Moderate-Risk complaint - notify their RM.
- High-Risk complaint - Notify their RM, Chief Operating Officer (COO) and Risk and Safety Panel (RSP).
- When a complaint is an allegation of child harm, use of inappropriate discipline or a circumstance that poses an immediate risk to the safety and/or wellbeing of a child, go to step 4 of the *Reporting an Allegation of Child Harm Occurring at a C&K Branch Centre Procedure* AND continue to follow remaining steps and responsibilities outlined in this procedure.

### 4. Notify Regulatory Authority (if applicable)

**As soon practical, within 24hrs from receipt of complaint**

#### Centre Director/Nominated Supervisor or Responsible Person in Charge will:

- Complete appropriate C&K Online Notification Form (with attached record of complaint and any other supporting documents) on the NQF intranet page:
  - Complaint alleging a serious incident has occurred or is occurring
  - Complaint alleging a breach of Law or Regulation
  - Allegation of physical or sexual abuse of a child/ren has or is occurring
  - Any circumstance posing a significant risk to a child's health, safety and wellbeing

#### Quality, Regulation and Safeguarding team will:

- Complete notification via NQAITS and email notification receipt to ECEM.

## 5. Assign case manager to review the complaint

### Centre Director/Nominated Supervisor or Responsible Person in Charge will:

- Case-manage low-risk complaints. Refer to [appendix two](#) of this procedure.

### Quality, Regulation and Safeguarding team will:

- Assign appropriate case manager\* to manage moderate or high-risk complaints.
- Assign an alternative case manager where a conflict of interest has been identified.
- Send case manager an email with a link to view the online feedback submission and a link to manage the feedback

**\*Note:** Case managers do not investigate complaints alleging child harm or the use of inappropriate discipline occurring at a C&K centre. These matters are investigated in accordance with the [Workplace Investigation Procedure](#). Appointed investigators will provide the case manager updates throughout the investigation process. At the conclusion of the investigation, the C&K Risk and Safety Panel will promptly inform the case manager, and other relevant managers, of the outcome and, where applicable, next steps.

## 6. Communication and record keeping

### Case manager will:

- Promptly declare any conflict of interest to the Quality Regulation and Safeguarding team.
- While maintaining privacy and confidentiality, communicate clearly and honestly with all relevant stakeholders. Whenever possible, facilitate face-to-face communication with (adult) complainant. As detailed in the *Parent and Community Code of Conduct*, complainants will meet (face to face, online or telephone) with case manager.
- Maintain regular communication with complainants. Provide updates via the telephone or meeting face to face. Outline process, approximate timelines and the importance of maintaining confidentiality.
- When applicable, inform the complainant if their complaint (including their name and contact details) has been notified to the regulatory authority or any other statutory body.
- Update *Online Feedback Register* case file (moderate or high-risk complaints only): status changes, documentation, or other relevant information to maintain an accurate and continuous record.
- When images or recordings are provided by the complainant:
  - Treat any recordings including a child's image or voice as sensitive personal information.
  - Store the recordings in a secure C&K directory and retain as per the [Archiving and Storage Procedure](#).
  - Restrict access to the recordings to employees directly involved in the complaint or investigation.
  - With the assistance of Legal, Risk and Governance team, determine its authenticity as original and unedited, considering meta-data including the date, time and location of recording.
  - Determine its relevance to the complaint and corroborate with other evidence where possible.
  - Document how the recordings were received and how they have been handled to maintain integrity.

## 7. Review Compliant

### Case manager will:

- Review complaint in a professional, respectful, and timely manner, ensuring the process is conducted fairly and impartially, with a balanced and unbiased assessment of all relevant information.
- Complete an initial desk-top review of complaint and relevant C&K policies/procedures.
- Review any supporting information provided by the complainant.
- When appropriate, request [witness statements](#) from, or meet with, relevant stakeholders.
- When necessary, complete a site assessment of complaint location.
- When applicable, obtain additional information from the complainant to clarify details of the complaint.
- When required, schedule face-to-face meetings with the complainant to confirm details of the complaints.
- Review evidence and determine appropriate finding/outcome.

## 8. Finalise

### Case manager will:

- Schedule a face-to-face meeting with the complainant to communicate findings, recommendations and actions without breaching the [privacy/confidentiality](#) of children, families and employees. Face to face meetings is preferred to communicate findings, recommendations and actions.
- If complainant is unhappy with resolution, outline the [appeal process](#).
- Update the *Online Feedback Register* case file:
  - Record all communication with the complainant.
  - Findings, recommendations and actions (and agreed time frames)
  - Attach relevant documents/evidence
  - Complainant's level of satisfaction with resolution
  - Resolve the *Online Feedback Register* case file.
- Ensure all agreed recommendations and actions are completed by due date.
- Confidentially destroy any hard copy records once uploaded to the complaint file.

## Complaint appeal process

- Where a complainant requests an appeal, the matter is escalated to the next level of management or another appropriate delegate nominated by RSP.
- The relevant manager will conduct a review of the complaint management review process, findings, and any recommendations and/or actions.
- If relevant manager or RSP supports the complaint management review process, findings, and recommendations and/or actions they will contact the complainant to outline their decision/s reached.
- If the relevant manager or RSP does not support the complaint management review process, findings, and recommendations and/or actions, the relevant manager or RSP will appoint a new/appropriate case manager to commence a new complaint management review process. The relevant manager or RSP will inform the complainant that a new complaint management review process will be completed.

## References and resources

- ACECQA Information Sheet – *Using Complaints to Support Continuous Improvement*
- Australian Government - *Responding to children and young people's disclosure of abuse*
- Standards Australia (2014) - *Australian Standard AS/NZS 10002:2014 Guidelines for complaint management in organisations.*
- The State of Queensland - (Office of the Ombudsman) (2006). *Guide to Developing Effective Complaints Management Policies and Procedures*

## Appendix One – Risk Matrix and Escalation/Notification Pathway

		Consequence				
		Insignificant	Minor	Moderate	Major	Catastrophic
Likelihood	Almost Certain	Low	Moderate	Moderate	High	High
	Likely	Low	Low	Moderate	Moderate	High
	Possible	Low	Low	Low	Moderate	Moderate
	Unlikely	Low	Low	Low	Low	Low
	Rare	Low	Low	Low	Low	Low

Risk level	Complaint Examples
<b>Low Risk</b>	<ul style="list-style-type: none"> <li>• A parent requested their child not to be allowed to sleep. Their child is asleep when they arrive to collect their child.</li> <li>• A parent is upset that their child's shoes are always missing at pick-up.</li> <li>• A parent complains that an educator is rude and unprofessional.</li> <li>• A parent believes their child does not have enough to eat and comes home hungry.</li> <li>• A parent is unhappy with the cleanliness of their child's centre.</li> </ul>
<b>Moderate Risk</b>	<ul style="list-style-type: none"> <li>• A parent complains that an external photographer took a photo of their child without their authorisation.</li> <li>• A community member alleges they saw an educator smoking outside a C&amp;K centre in close proximity to children.</li> </ul> <p>A complaint relating to a serious child injury at the centre not reported</p>
<b>High Risk</b>	<ul style="list-style-type: none"> <li>• Parent alleges an educator has harmed their child.</li> <li>• Parent alleged a medical action plan is not followed resulting in medical treatment being required</li> <li>• Parent alleges a serious head injury did not have adequate first aid</li> </ul>
<b>High Risk or Critical Incident</b>	<ul style="list-style-type: none"> <li>• A child absconds from a service and is hit by a car</li> <li>• An educator is arrested for allegedly possessing child pornography</li> </ul>