

# Non-State Schools Accreditation Board

## Complaints Management Policy

Effective 3 August 2006

Updated 4 June 2015

Ref: 11/364095

## Table of Contents

PART 1 – POLICY BACKGROUND.....	3
1. Policy commitment statement.....	3
2. Policy ownership.....	3
3. Application / scope of policy.....	3
PART 2 – ABOUT THE NON-STATE SCHOOLS ACCREDITATION BOARD .....	3
4. Legislation.....	3
5. Functions of the Board.....	3
6. Decisions of the Board.....	4
7. Dissatisfaction with the Board’s response.....	4
PART 3 – PRINCIPLES OF COMPLAINTS MANAGEMENT .....	4
PART 4 – MANAGEMENT OF COMPLAINTS.....	4
8. Definitions .....	4
9. Modes for Complaints Management .....	5
10. Assessing Complaints.....	5
11. Complaints Register.....	5
12. Regular internal reporting on complaints trends .....	6
13. Communication.....	6
14. Safeguards against retribution .....	6
PART 5 - IMPLEMENTATION .....	6
15. Compliance / Policy Alignment .....	6
16. Authorisation.....	6
17. Resources.....	6
18. Effective date .....	6
19. Evaluation .....	6
20. Staff training.....	6
21. Updates .....	6

## PART 1 – POLICY BACKGROUND

### 1. Policy commitment statement

Non-state schooling is a vital and expanding component of Queensland education. It is essential that it retains the high standing in which it is held by the community.

The Non-State Schools Accreditation Board (the 'Board') is an independent statutory authority that regulates non-state schooling. The Board is responsible for making decisions on the accreditation and changes in accreditation attributes of non-state schools, as well as monitoring governance arrangements and compliance with accreditation criteria.

In the course of performing its duties, the Board receives complaints about non-state schools, including their governing bodies, as well as complaints relating to the performance by the Board of its statutory functions. In relation to these matters, the Board's policy affirms and supports the rights of students, parents and other persons acting in the interests of a school, or proposed school, to make inquiries, to provide relevant information, and to submit complaints and have them heard and dealt with by the Board.

Subject to the [Education \(Accreditation of Non-State Schools\) Act 2001](#) (the 'Act'), the Board may direct the person to an appropriate authority, where the enquiry or complaint does not fall within the Board's legislative jurisdiction.

The Board must record and analyse information about enquiries and complaints so it can improve its decision-making service, systems and staff skills.

### 2. Policy ownership

The Board is responsible for approving this policy.

### 3. Application / scope of policy

This policy applies to enquiries and complaints (hereafter referred to as "matters") made to the Board relating to:

- (a) Queensland non-state schools or their governing bodies.
- (b) The performance by the Board of its statutory functions.

## PART 2 – ABOUT THE NON-STATE SCHOOLS ACCREDITATION BOARD

### 4. Legislation

The Act establishes a regulatory framework for the accreditation and Government funding of Queensland non-state schools. It commenced at the beginning of 2002.

The purpose of the legislation is to:

- uphold the standards of education offered at non-state schools;
- maintain public confidence in the operation of non-state schools;
- foster educational choices in Queensland; and
- provide the basis for the efficient allocation of Government funding for non-state schools.

### 5. Functions of the Board

The functions of the Board are prescribed by section 106 of the Act and include:

- (a) assessing applications for accreditation of non-state schools;
- (b) accrediting provisionally accredited schools complying with the accreditation criteria;
- (c) keeping a register of provisionally accredited, and accredited, non-state schools; and
- (d) monitoring whether:
  - (i) accredited schools continue to comply with the accreditation criteria;
  - (ii) the governing body of a provisionally accredited, or accredited, school is suitable to be, or continue to be, the school's governing body;

- (iii) a Government funded school is a school not being operated for profit;
  - (iv) the governing body of a Government funded school is not a party to a prohibited arrangement in relation to the operation of the school; and
  - (v) there is no direct or indirect connection between the governing body of a Government funded school and a for-profit entity that could reasonably be expected to compromise the independence of the governing body when making financial decisions; and
- (e) examining, and advising the Minister about, the operation of the accreditation scheme under the Act.

## 6. Decisions of the Board

In carrying out its functions, the Board makes decisions on the accreditation of non-state schools and changes in accreditation attributes of non-state schools, as well as governance arrangements and compliance with accreditation criteria.

In accordance with chapter 4 of the Act, persons affected by decisions made by the Board in respect of these matters may apply to the Minister for a review of the Board's decision.

## 7. Dissatisfaction with the Board's response

If a person making an enquiry or complaint is dissatisfied with the Board's response, they may refer the matter to the Queensland Ombudsman, other than where the person making the enquiry or complaint is a person dissatisfied with a decision of the Board which is subject to review under chapter 4 of the Act.

## PART 3 – PRINCIPLES OF COMPLAINTS MANAGEMENT

The following principles apply in the Board's actions concerning the management of complaints:

### Fair Treatment

- complaints will be dealt with promptly, professionally, and in a fair, objective and equitable manner reflecting principles of natural justice;

### Confidentiality

- the Board will deal with complaints in a confidential manner that is respectful to both the complainant and the respondent;

### Transparent Process

- complainants will have easy access to information about how to complain and how the Board deals with complaints;

### Ease of Lodgement

- complainants will be able lodge complaints either in written or oral form through multiple methods and without charge – including anonymously; and

### Influence Business Processes

- complaints data will be regularly reported upon and will influence business improvement processes if appropriate.

## PART 4 – MANAGEMENT OF COMPLAINTS

### 8. Definitions

**Codes of conduct** – the codes of conduct developed by the Board under the [Public Sector Ethics Act 1994](#) for members of the Board, the Eligibility for Government Funding Committee (the Funding Committee) and other committees, and for Authorised Officers of the Board.

**Complaint** – a matter raised as a formal expression of dissatisfaction by a complainant about a non-state school, governing body or the Board. There should be sufficient detail provided to support investigation. A complaint may be initiated either orally or in writing, for the Board's consideration.

**Complainant** – the person or organization lodging a complaint with the Board.

**Complaints Management System** – the documentation concerning how the Board manages complaints. It includes the policy, procedures and information on the website.

**Concerned party** – the person or organisation lodging an enquiry with the Board.

**Enquiry** – a communication or contact between the Board and the concerned party to clarify an issue regarding the Board's functions or a non-state school's policy, procedures or practices. This interaction may result in referral to another agency if the matter is outside the Board's jurisdiction.

**Intake Officer** – the officer receiving the enquiry or complaint in the first instance.

**Matter** – refers generally to an enquiry or complaint.

## 9. Modes for Complaints Management

### (1) Enquiries

- (a) A matter is classified as an enquiry if the nature of the contact is the seeking of information or the asking of a question.
- (b) The intake officer receiving an enquiry from a concerned party must identify and clarify the issues raised
- (c) The intake officer must advise the concerned party of his/her options (for example, if an enquiry may be more appropriately handled by another agency) and that a written or oral complaint may be made to the Board
- (d) The intake officer must keep a written record of the enquiry on the Board's database for later analysis.

### (2) Complaints

- (a) A matter is classified as a complaint if the nature of the contact is an expression of grievance or displeasure made about the decisions, actions and/or services of the organisation. It can be in either written or oral form.
- (b) The intake officer receiving a complaint from a complainant

must seek to identify and clarify the issues.

- (c) If a complaint cannot be dealt with under this policy, the Board must advise the complainant of his/her resolution options, including review by the Queensland Ombudsman, or other avenue of appeal or review.
- (d) The Board may request further information if insufficient detail is provided initially. Investigation of a complaint may be delayed until this information is provided.
- (e) The Board is committed to dealing with complaints in a manner that enables due process

## 10. Assessing Complaints

If a complaint is referred to the Board, it must assess the complaint and decide on an appropriate course of action. Appropriate actions may include resolution, investigation, referral to another agency or a decision not to progress the complaint. When a course of action is decided, the complainant should be notified. Expected timeframe and the Board's contact details should also be provided at this time.

When a complaint is finalised, the complainant should be notified promptly. Outcomes of complaints cannot always be conveyed, however, due to confidentiality provisions.

## 11. Complaints Register

The Board maintains records of its operations and the operations of the Funding Committee in accordance with the [Public Records Act 2002](#).

The Complaints Register will be the primary tool for the collection of data. A current and accurate record of enquiries and complaints will be maintained to:

- (a) ensure data quality and integrity;
- (b) identify any recurring or system-wide problems;
- (c) fulfil Queensland Government annual reporting requirements;
- (d) provide non-identifiable reports where necessary; and
- (e) provide data for inclusion with Board performance indicators as required.

## 12. Regular internal reporting on complaints trends

A status report from the Register will be submitted to the Board at least on a quarterly basis.

## 13. Communication

The Board's website ([www.nssab.qld.edu.au](http://www.nssab.qld.edu.au)) provides information in relation to accreditation and funding of non-state schools in Queensland, as well as information about the Board and the Funding Committee. It also provides information on complaints handling by the Board including copies of this document, the procedures and an electronic form for lodgement of complaints. If required, a printed copy of this information is available from the Board's secretariat.

## 14. Safeguards against retribution

The Board is committed to processes that ensure complainants are not victimised. All complaints will be treated confidentially, in accordance with section 173 of the Act. Personal information will be treated in accordance with the principles contained in the [Information Privacy Act 2009](#).

in providing adequate resources and trained personnel.

## 18. Effective date

This policy commenced on 3 August 2006 and was reviewed on 4 June 2015.

## 19. Evaluation

The Board monitors the quality and effectiveness of its complaints management system. It does this through acting on appropriate feedback, and regularly reviewing and updating its policies and procedures.

## 20. Staff training

Intake officers and Board members will receive regular training in the requirements of this policy and its associated procedures.

## 21. Updates

Any changes to this policy must be approved by the Board. Intake officers will be notified when any changes are made.

## PART 5 - IMPLEMENTATION

### 15. Compliance / Policy Alignment

This policy is consistent with the strategic goals of the Board and the codes of conduct.

### 16. Authorisation

Section 40 of the Act in relation to investigations and section 106 of the Act in relation to the functions of the Board, provide the legislative authority for this policy.

### 17. Resources

In accordance with section 127 of the Act, the Board is committed to excellence in dealing with complaints and recording and analysing complaints data. It works with the Department of Education and Training,