



# Child Safe Program

## Complaints Management (Child Protection) Policy and Procedures

### Introduction

In the Lutheran learning communities the gospel is to "inform all programs, relationships and activities" (LCA and Its School statement). The love of God in Jesus Christ is to govern all that is done, in response to this love, people in the school community are directed to their fellow human beings. Where they love others, they love him. Christ's promise is that whatever is done for others is done for him. Informed and transformed by God's creative, redemptive and sanctifying love, God's people are concerned with the total needs of their fellow human beings.

The Child Safe Program in place at each learning community defines power as the capacity to set and care for boundaries. Boundaries are the structures which support human development within community; boundaries may be personal, communal, spiritual, psychological or physical. In Christ, there is an empowerment by the gospel to recognise boundaries and prevent their destructive crossing and to care for those who have been violated. Our responsibility of leadership is to care for professional boundaries through the establishment of structures that protect them. Structures provide for support, examination, and action to ensure that leaders, staff and students act according to boundaries that help, protect and uphold the dignity, worth and safety of each individual. (Valuing Safe Communities: Statement of values)

All children and young people who come to the Learning Community have a right to feel and be safe. We are committed to the safety and wellbeing of all children and young people. We are committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe, and are able to actively participate in decisions that affect their lives.

We have a zero tolerance for harm to children and young people and are committed to acting in students' best interests and keeping them safe from harm.

The Learning Community regards its child safety responsibilities with the utmost importance and is committed to providing the necessary resources to ensure compliance with all relevant child

protection laws and regulations and maintaining a child safe culture.

Each member of the Learning Community has a responsibility to understand the important and specific role that they play individually, and collectively, to ensure that the wellbeing and safety of all students is at the forefront of all that they do, and every decision that they make.

Good Shepherd Lutheran College NT is a co-educational, independent College operated by the Lutheran Church of Australia. The College is made up of three Junior Schools (Early Learning Centre to Year 5) located at Leanyer, Palmerston and Howard Springs and one Middle and Senior School located at Howard Springs.

At Good Shepherd Lutheran College, we inspire and equip students to flourish as compassionate, highly capable people who enrich the lives of others guided by Christian values of: Community, Respect and Service.

## **Statement of Commitment to Child Safety**

All children and young people who come to Good Shepherd Lutheran College have a right to feel and be safe. We are committed to providing a child safe and child friendly environment, where children and young people are safe and feel safe, and can actively participate in decisions that affect their lives.

We have zero tolerance for abuse and other harm and are committed to acting in students' best interests and keeping them safe from harm.

The College regards its child protection responsibilities with the utmost importance and is committed to providing the necessary resources to maintain a child safe culture and ensure compliance with all relevant child safe organisation and child protection laws and regulations.

Each member of the College community has a responsibility to understand the important and specific role that they play individually and collectively to ensure that the wellbeing and safety of all students is at the forefront of all that they do and every decision that they make.

## **Purpose**

Section 145B of the Education Act 2015 (NT) requires Good Shepherd Lutheran College Board NT INC to establish and maintain a policy for managing complaints made in relation to the College, and that provides for the timely management of complaints and for procedural fairness in the management of complaints.

Non-Government School Registration Standard 2.10 also requires the College to have a policy for managing complaints and to maintain a complaints register.

The **Managing Complaints and Grievances Policy** sets out how the College meets these requirements with respect to complaints made about the College in general.

The College must also apply and adopt the National Principles for Child Safe Organisations (National Principles). National Principle 6 requires the College to:

- have an accessible, child-focused complaint handling policy which clearly outlines roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report
- have effective complaint handling processes that are understood by students, families, Staff, and Volunteers, and are culturally safe
- take complaints seriously, respond promptly and thoroughly, and meet reporting, privacy and employment law obligations.

This Policy and its Procedures complement the Managing Complaints and Grievances Policy and help to create a child safe environment at the College by:

- setting out specific procedures for enabling and managing complaints that involve children and young people
- establishing processes for receiving, considering and responding to child protection-related complaints; and
- providing additional guidance on implementing the Managing Complaints and Grievances Policy when a complaint involves a child or young person.

They outline how the College:

- has and implements a child-focused complaints handling system
- manages different types of child protection-related complaints
- ensures that child protection-related complaints are handled in a timely, fair and transparent manner.

## Scope

If you are one of the people set out in the subsections of this Policy and its Procedures, the relevant subsection applies to you.

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

This Policy and its Procedures apply in all College environments. College environments include physical and online environments, and on-site and off-site College grounds (e.g. camps and excursions, and interstate and overseas travel).

## Roles and Responsibilities

The following people have particular responsibilities under this Policy and its Procedures (additional roles and responsibilities are set out in the subsections below):

### Staff Members

If you are a staff member, you are responsible for:

- responding appropriately to a student who raises or is affected by a child protection-related complaint
- understanding and complying with your internal and external reporting requirements relevant to child protection-related complaints
- complying with this Policy and its Procedures whenever you receive a child protection-related complaint.

### Child Protection Officers

If you are a Child Protection Officer, you are responsible for:

- providing assistance and advice to Staff about their obligations under this Policy and its Procedures
- ensuring that all child protection-related complaints are taken seriously, escalated, reported and responded to
- ensuring that the College responds appropriately to a student who raises or is affected by a child protection-related complaint
- where authorised by the Principal or Chair of the Board, promptly and thoroughly managing the College's response to a child protection-related complaint as set out in the **Procedures** below
- where authorised by the Principal, monitoring the College's compliance with this Policy and its Procedures.

## The Principal

If you are the Principal, you are responsible for undertaking Child Protection Officers' responsibilities above, as well as for ensuring the efficient and effective organisation, management and administration of the College's child protection complaints handling processes.

You may authorise other people at the College to undertake certain complaints management responsibilities, however you remain ultimately responsible and accountable for implementing this Policy and its Procedures.

References to the Principal in this Policy and its Procedures therefore include these other people when they are undertaking responsibilities under this Policy and its Procedures.

## The Chair of the Board

If you are the Chair of the Board, you are responsible for receiving, investigating, managing and responding to child protection-related complaints that involve the Principal.

You may authorise other people at LESNW to undertake one or more of these responsibilities.

## LESNW

LESNW is responsible for:

- approving and regularly reviewing this Policy and its Procedures, as set out in the **Annual Reviews and Continuous Improvement (Child Protection) Policy and Procedures**
- analysing the College's child protection-related complaints reports and, where appropriate, directing and monitoring improvements to the College's approach to child safety incidents or concerns.

## Policy Statement

1. The College's system for handling complaints that involve students and former 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 (Complaint Handling Guide)
- culturally safe
- confidential

- accessible to all members of the College community
- regularly reviewed, to inform the continuous improvement of the College's Child Protection Program and practices.

2. If you are the Principal, you **must** ensure that the College:

- consults with relevant communities about how to enable, support and respond to complaints in a culturally sensitive way
- has simple age and culturally appropriate avenues for students, Staff, parents/carers and the wider community to make a complaint, including child protection-related complaints, as set out in Making a Child Protection-Related Complaint in the **Procedures** below
- has developed, in consultation with students, a child-friendly version of this Policy and its Procedures, and provides this to all students
- supports students, families, and relevant staff members involved in a child protection-related complaint in age and culturally appropriate ways, as set out in the **Support Following Child Safety Incident or Disclosure** section of the **Managing Your Initial Response to a Child Safety Incident or Concern Policies and Procedures** (Annexure 1)
- keeps appropriate records of all child protection-related complaints and the College's response, as set out in Managing Child Protection-Related Complaints - the College's Obligations in the **Procedures** below
- regularly reviews and analyses child protection-related complaints, as set out in the **Procedures** below
- reports all child safety incidents and concerns that occur at the College or involve its staff members, including those raised in child protection-related complaints, to LESNW as soon as practicable after the College becomes aware of the incident or concern
- complies with the following subsections of the **Procedures** below:
  - Managing Child Protection-Related Complaints – the College's Obligations
  - Internal Reviews of Child Protection-Related Complaint Outcomes
  - General Reviews of Child Protection Complaints Management .

3. If you are a staff member, you **must** respond to child protection-related complaints as set out in Responding to Child Protection-Related Complaints – Staff Members' Obligations in the **Procedures** below.

4. If you are the Principal, the Chair of the Board, or have been delegated responsibility for managing, investigating or responding to child protection-related complaints, you **must** respond to a child

protection-related complaint as set out in Managing Child Protection-Related Complaints – the College’s Obligations in the **Procedures** below.

## Procedures

### 1. Making a Child Protection-Related Complaint

1.1 Anyone can, at any time, make a child protection-related complaint:

- to the Principal
- a Child Protection Officer
- a trusted staff member

in person, in writing or over the phone.

Non-child protection-related complaints should be made to the Principal.

1.2 Parents/carers, family members and other community members who have child protection concerns about the College or who wish to make a child protection-related complaint about the College, its students or its staff members are asked to follow the procedures set out in our **Child Safe Policy** and to contact:

- the College’s Deputy Principal, Jason Mustin, by phoning 08 8983 0300 or emailing [jason.mustin@gslc.nt.edu.au](mailto:jason.mustin@gslc.nt.edu.au), or the Principal; or
- if the concern relates to the Principal, the Chair of the Board by [collegeboard@gslc.nt.edu.au](mailto:collegeboard@gslc.nt.edu.au).

1.3 Students have multiple pathways to make a complaint, including child protection-related complaints, at the College. These include:

- disclosing child safety incidents or concerns, including the abuse or other harm of themselves or of any other child, young person or student aged 18 or over, to any staff member. This might be done:
  - verbally
  - in writing
  - through electronic means (such as email); or
  - indirectly (such as in written assignments, in artworks or in any other way)
- disclosing child safety incidents or concerns, including the abuse or other harm of themselves or of any other child, young person or student aged 18 or over, anonymously using the Students

may provide anonymous feedback via the [Community Feedback](#) mechanism found on the College's website. which is located College website

- by contacting Office of the Children's Commissioner: Northern Territory 1800 700 250.

## 2. Responding to a Child Protection-Related Complaint – Staff Obligations

### 2.1 Support for Complainants

If you receive a complaint containing information about a child safety incident or concern, you **must** offer the complainant and any student involved in the complaint (if they are not the complainant) age and culturally appropriate support and assistance following the **Support Following Child Safety Incident or Disclosure** section of the **Managing Your Initial Response to a Child Safety Incident or Concern Policies and Procedures** (Annexure 1).

If the complaint relates to historical sexual abuse, a sexual offence or sexual misconduct that occurred before 1 July 2018, you **must** inform the complainant about the [National Redress Scheme](#) for people who have experienced institutional child sexual abuse. The process for applications involving the College can be found through [Lutheran Church of Australia and New Zealand.](#)

### 2.2 Internal and External Reporting

If you receive a complaint that a student may have been subject to, or may be at risk of, abuse or other harm:

- at the College or a College event
- from a staff member; or
- from another student

you **must** follow all relevant Policies and Procedures in **Responding to and Reporting Child Safety Incidents or Concerns Policies and Procedures**.

In particular, you **must**:

- comply with all responding and reporting obligations that apply to you. Depending on the circumstances, these obligations may include:
  - reporting to the Department of Territory Families, Housing and Communities (Territory Families)
  - reporting to the Police

- taking steps to protect students from future risks of abuse or other harm, where those steps are within your power or responsibilities to take (to meet your duty to protect obligations)
- reporting teacher misconduct to the Teacher Registration Board of the Northern Territory
- providing information to other external agencies
- report the child protection-related complaint to:
  - a Child Protection Officer or the Principal; or
  - the Chair of the Board, if the complaint involves the Principal

in addition to making any external reports.

### **3. Managing Child Protection-Related Complaints – The College’s Obligations**

3.1 Child Protection-related complaints that involve, or raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over **must** be managed following relevant policies and procedures in the Child Protection Program

The following child protection-related complaints fall into this category:

- complaints involving, or raising the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over occurring at the College or a College event
- complaints involving, or raising the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over or by a staff member or another student
- complaints alleging a breach of the Child Protection Codes of Conduct by a staff member and that involve, or raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over.

Relevant policies and procedures for managing these kinds of child protection-related complaints include, but are not limited to:

- Mandatory Reporting to Territory Families Policy and Procedures
- Reporting to Police Policies and Procedures
- Duty to Protect Policy and Procedures
- Child Safety Incidents or Concerns Involving the College Policies and Procedures
- Reporting Teacher Misconduct to the Teacher Registration Board of the Northern Territory Policy and Procedures.

The Principal (or, if the complaint involves the Principal, the Chair of the Board) is responsible for managing these kinds of child protection-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the College (such as a Child Protection Officer) or LESNW.

### 3.2 Certain other child protection-related complaints **must** be managed following relevant policies and procedures in the Child Protection Program

The following child protection-related complaints fall into this category:

- complaints about the College's investigation of and/or response to a specific incident of or concern about abuse and other harm to a child, young person or student aged 18 or over
- complaints that, when responding to a specific incident of, or concern about, abuse and other harm to a child, young person or student aged 18 or over, the College, or a staff member, did not correctly follow the College's own policies (for example, a complaint that a staff member did not report a child safety incident or concern internally when required to by College policy)
- complaints that the College, or a staff member, did not correctly follow legislative or regulatory requirements regarding child safety in relation to a specific incident of, or concern about, abuse or other harm to a child, young person or student aged 18 or over (for example, a complaint that the College shared information about a child safety incident or concern with an external agency when not permitted by law to do so).

Relevant policies and procedures for managing these kinds of child protection-related complaints include, but are not limited to:

- Child Protection Program Breach Management Policy and Procedures
- Annual Reviews and Continuous Improvement (Child Protection) Policy and Procedures.

The Principal (or, if the complaint involves the Principal, the Chair of the Board) is responsible for managing these kinds of child protection-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the College (such as a Child Protection Officer) or LESNW.

### 3.3 Certain Child Protection-related complaints **may** be managed under other College policies and procedures

The following child protection-related complaints fall into this category:

- complaints alleging a breach of the Child Protection Codes of Conduct that **do not** involve, and **do not** raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over by a staff member (for example, a complaint that a staff member has expressed personal views on sexuality in the presence of students)
- complaints alleging procedural breaches of the Child Protection Program by Staff that **do not** involve, and **do not** raise the possibility of a risk of, abuse or other harm to a child, young person or student aged 18 or over (for example, a complaint that a staff member has not renewed their RWVP)
- general complaints about our Child Protection 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).

Relevant policies and procedures for managing these kinds of child protection-related complaints include, but are not limited to, the College's general Complaints Handling and/or Human Resources policies and procedures.

The Principal usually manages these kinds of child protection-related complaints. However, they, or whoever else may be managing the complaint, must – where appropriate – consult with a Child Protection Officer as part of their investigation.

With respect to the final dot point above, given the high risk to the College of not having a compliant Child Protection Program, it is likely that the College will need to report the outcome of these kinds of complaints to Good Shepherd Lutheran College Board NT INC, using the College's usual governance reporting processes.

### **3.4 Record Keeping About Child Protection-Related Complaints**

The College does not hold records of complaints that contain information about child safety incidents or concerns within its general Complaints Handling record keeping system, because of the confidentiality and privacy issues that arise with respect to child safety incidents and concerns.

If you are responsible for managing a child protection-related complaint, you must record it, and the College's response as a child safety incident or concern, following the **Record Keeping (Child Protection) Policy and Procedures**.

### **3.5 Guidance and Resources for Managing Child Protection-Related Complaints**

The Managing Complaints and Grievances Policy provides guidance on complaints handling principles and a step-by-step guide to managing complaints in general.

The National Office for Child Safety's Complaint Handling Guide provides guidance on handling complaints that involve children and young people.

The **Child Safety Incidents or Concerns Involving the College Policies and Procedures** and **Reporting Teacher Misconduct to the Teacher Registration Board of the Northern Territory Policy and Procedures** set out procedures that the College will follow for complaints about inappropriate conduct by Staff.

#### **4. Internal Reviews of Child Protection-related Complaint Outcomes**

If a complainant or other person involved in a child protection-related complaint (such as a staff member whose behaviour is the subject of the complaint, a student who is the victim of the alleged behaviour or the parent/carer of a student involved in the complaint) is not satisfied with its management or its outcome, they may request an internal review.

This review could be of the:

- procedures undertaken
- findings made
- disciplinary actions proposed or taken; and/or
- other outcomes (including a decision not to make a finding or to take disciplinary or other action).

People who want an internal review must make their request to Principal.

College Board undertakes these internal reviews.

#### **5. General Reviews of Child Protection Complaints Management**

Regular reviews of child protection-related complaints ensure that the College captures, analyses and, where appropriate, acts on child safety-related feedback, comments or complaints from the College community members and relevant stakeholders.

The **Annual Reviews and Continuous Improvement (Child Protection) Policy and Procedures** sets out Good Shepherd Lutheran College NT Board Inc's and the College's procedures for conducting

these reviews, as well as for reviewing this Policy and Procedures (as part of the regular reviews of the Child Protection Program).

During these reviews, the College analyses child protection-related complaints, to identify causes and systemic failures and to inform continuous improvement.

## Implementation

The College implements this Policy and its Procedures through:

- making them available to all Staff, via the College's Intranet
- including information about them in induction training and in ongoing refresher training for Staff and relevant Volunteers and Contractors
- making them available to parents/carers, students and the wider College community in summary in our Child Safe Policy and [Managing Complaints and Grievances Policy](#), which are available on our public website
- including information about them in a child-friendly version, and providing this to all students
- providing a hard copy by request.

## Breach

If you breach this Policy and its Procedures, the College can investigate your conduct. You could face disciplinary action, such as (depending on the severity of the breach):

- attending remedial education
- attending counselling
- increased supervision
- restriction of duties
- suspension
- in the case of serious breaches, termination of employment, contract or engagement.

For more information, refer to **Child Protection Program Breach Management Policy and Procedures**.

## Definitions

Definitions of particular terms used in this Policy and its Procedures can be found in **Child Protection Program Definitions** and **Definitions and Key Indicators of Abuse and Other Harm**.

Of particular relevance to this Policy and its Procedures are the following additional key definitions:

Term	Definition
Complaint	<p>A “complaint” is an expression of dissatisfaction with an action taken, decision made, or service provided, or with the failure to provide a service, take action or make a decision at the College.</p> <p>A complaint can be made by anyone including a student, former student, parent/carer, other family member, staff member or member of the wider community.</p>
Child Protection-Related Complaint	<p>A child protection-related complaint includes any disclosure, allegation, suspicion, concern or internal report of:</p> <ul style="list-style-type: none"> <li>• a breach of the Child Protection Codes of Conduct</li> <li>• a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the College or a College event</li> <li>• child safety incidents or concerns involving College Staff</li> <li>• other staff misconduct (such as a procedural breach of the Child Protection Program)</li> <li>• any complaint about the College’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with our Responding to and Reporting Child Safety Incidents or Concerns Policies and Procedures.</li> </ul>

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## Source of Obligation

This Policy and its Procedures help the College and its Staff, Volunteers and Contractors to meet obligations in:

- Education Act 2015 (NT), sections 4 and 125
- Non-Government School Registration Standards, Standards 2.3, 2.10 and 8
- National Principles for Child Safe Organisations, Principle 6

## Related Policies

- [Child Safe Policy](#)
- [Codes of Conduct \(Child Protection\) Policies and Procedures](#)
- [Mandatory Reporting to Territory Families Policy and Procedures](#)
- [Working with Children Clearance \(Ochre Card\) Policy and Procedures](#)
- [WWC Clearances \(Ochre Cards\) Procedures for Staff](#)
- [Risk Management \(Child Protection\) Policy and Procedures](#)
- [Record Keeping \(Child Protection\) Policy and Procedures](#)
- [Compliance, Review and Improvement \(Child Protection\) Policies and Procedures](#)
- [Child Protection Program Definitions](#)
- [Annual Reviews and Continuous Improvement \(Child Protection\) Policy and Procedures](#)
- [Definitions and Key Indicators of Abuse and Other Harm](#)
- [Managing Complaints and Grievances Policy](#)

## Related Documents

Insert Content

## References

- Registrar Non-Government Schools, [Non-Government School Registration Standards](#)
- National Office of Child Safety, [Complaint Handling Guide: Upholding the rights of children and young people](#)
- Royal Commission into Institutional Responses to Child Sexual Abuse, [Final Report Volume 7 – Improving Institutional Responding and Reporting](#)

## Policy Administration

<b>Status</b>	<b>Assurance Key</b>	<b>Approver(s)</b>	<b>Approval Date</b>	<b>Version Number</b>	<b>Last Reviewed</b>	<b>Review Frequency</b>	<b>Next Review Date</b>
Current	GSLC-PR-245	Board	22/05/2025	1	May 2025	Annual	May 2026

## **Annexure 1**

### Support Following Child Safety Incident or Disclosure