



Complaints Management

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Procedure maintenance

This document is to be reviewed and updated as and when required by changing circumstances, with at least one review to be conducted every 24 months. Apart from minor revisions, all revisions to the procedure must be submitted for consideration by the Executive.

Date	Alteration	Rationale	Officer
Oct 2015	Inclusion of key terms (Section 4), the definition of a 'formal complaint' (Section 4), graphics (Section 6) and flowchart (Appendix 1). Updated process for handling a formal complaint and record keeping procedures. Change of policy owner, i.e. from Corporate Records to Policy and Planning. Minor edits to wording. Updated format to comply with Style Guidelines.	Scheduled review. Change of policy ownership. Definition of a formal complaint approved by Executive Group.	Krystyna Wichert
3/2/16 and 19/2/16	Minor edits to formatting, numbering and appendix	Similarity of policy document structures improves clarity of requirements	Alan Honeyman
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13/5/2020	Updated to reflect title changes and International Education and in the Complaints Management Process and the impact of Machinery of Government. The Disputes and Complaints Policy sits within the Department of Education.	Updated to include Appendix A and to change titles	Patricia Dunnett
18/06/2020	Updated to reflect title changes and International Education and in the Complaints Management Process	Updated to include Appendix B and C	Patricia Dunnett
23/6/2020	Final discussion with Manager – Strategic and External Relations resulted in further amendments to proposed inputs in relation to international education. Document sent to Assistant Executive Director, Curriculum, Assessment and Strategic Policy for approval.	Document updated	Patricia Dunnett
14/7/2020	Approved by Executive Group with minor edit. Edit completed. Management group advised of updated procedure.	Document update and distribution	Patricia Dunnett

Contents

1. PROCEDURE STATEMENT	1
2. SCOPE.....	1
3. BACKGROUND.....	1
4. KEY TERMS	1
5. PROCEDURES.....	2
5.1 Initial receipt of complaint.....	2
5.2 Processing of a formal complaint	3
5.3 Recordkeeping of complaints	5
6. RELEVANT DOCUMENTS.....	7
6.1 Authority documents.....	7
6.2 Legislation and other regulatory frameworks	7
APPENDIX A: PROCESS FOR MANAGEMENT OF COMPLAINT – INTERNATIONAL EDUCATION	8
1.1. Initial receipt of complaint.....	8
1.2. Processing of formal complaint in International Education	8

1. Procedure statement

All complaints about the operations of the School Curriculum and Standards Authority (the Authority) will be addressed in a timely and effective manner and recorded in the HPRM Complaints Register and in accordance to the Department of Education's *Disputes and Complaints Policy*.

2. Scope

- 2.1 All employees of the Authority have a responsibility to be aware of this document and the Authority's commitment to satisfactory resolution of any complaint received.
- 2.2 Designated employees have additional, specified responsibilities with respect to the management of complaints.

3. Background

The Authority recognises that its goal of continuous improvement is linked to customer feedback, and acknowledges the right of customers (both schools and students/parents) to complain if they are dissatisfied with a product or service for which the Authority is responsible.

It is an aspiration of the Authority, in the normal course of business, to minimise complaints through:

- clarity of its published documentation of its role and operations;
- timely communication of changes/revisions to its role and operations, and to requirements and deadlines associated with its operations; and
- timely responses to matters of concern or initial complaints.

While the Authority seldom receives complaints that require a formal response, the Authority is required to have in place a complaints management system that conforms to the principles of the Australian Standard on Complaints Handling (AS ISO 10002).

The intention of this document is to clarify and promote awareness of the Authority's requirements for the management of complaints about the Authority's operations.

4. Key terms

In the context of the operations of the Authority, the following terms have the associated definitions.

Agent	A person or organisation authorised to act on behalf of a school and/or recognised by the tertiary or training sector as such.
Complainant	An individual who makes a complaint.
Complaint	An expression of dissatisfaction which may be general in nature or relate to product or service or actions or behaviour of an employee, a part of the organisation, a policy or a decision. A complaint is sometimes used synonymously with the word 'grievance', though at other times, a complaint is said to be based on a 'grievance' which is considered to be grounds for a

	complaint. A complaint can generally be addressed at the time of being raised without the need for more involved consideration.
Formal complaint	A written complaint received by the Authority that is expressing dissatisfaction about the Authority products or services, or the complaints handling process itself, that need to be fully explained, examined, dealt with and finalised in the normal course of business through actions of the relevant officer.
Grievance	Grounds for a complaint.
HPE Records Manager	Hewlett Packard Records Manager (HPRM) is an electronic document and records management system that manages the Authority's documents and records throughout the document life-cycle, from creation to destruction.
Investigation	The formal examination of a complaint by an authorised person/s.
International Education Advisory Committee (IEAC)	A sub-committee of the Authority Board, established to provide advice and support to the Board related to the Authority's international education program.
Management of a complaint	Coordination all the processes involved in managing the complaint to its conclusion/resolution.
Record-keeping of Complaints	The Authority's official record-keeping system located on HPRM supports the complaints-handling process. It consists of a Complaints Register and a filing system that is housed in a dedicated subfolder for each formal complaint received.
Unresolved complaint	A formal complaint that is undergoing the resolution process and where a decision has not been made.

5. Procedures

5.1 Initial receipt of complaint

5.1.1 In the normal course of business, an Authority officer receiving a verbal complaint will try to resolve the issue when it is first raised, without further need for more involved consideration.

5.1.2 If discussion does not satisfy the complainant, or an agreement cannot be negotiated, the staff member will suggest that the complainant may wish to consult with the officer's line manager or submit a formal complaint.

5.1.3 A complainant wishing to make a formal complaint will be advised that it must be submitted in the form of a letter or an email and this may be completed via the 'Complaints' link (<http://www.scsa.wa.edu.au/complaints> provided on the front page of the Authority website, which leads to info@scsa.wa.edu.au).

5.1.4 A customer wishing to make a formal complaint is required to provide

- the name of the complainant
- provide a means of contact (address, phone number, email address)
- relate the complaint to a function of the agency (e.g. a complaint against a teacher would not be handled by the Authority)
- qualify the merit of the complaint in terms other than that of a personal opinion.

5.2 Processing of a formal complaint ¹

(See Figure 1 below for diagrammatic summary)

5.2.1 The **Principal Consultant, Curriculum, Assessment and Strategic Policy (CASP)** responsible for complaint management will:

- create a dedicated subfolder within the complaint file for complaint management
- register the complaint in the HPRM management system by selecting the Complaint Register Record Type (see 6.3.1) and save the complaint document to the subfolder
- send an acknowledgement letter to complainant within five working days and save a copy of that communication into the subfolder
- send an email with the complaint attached (use the HPRM Records reference option) to the Executive Director and/or relevant Assistant Executive Director/s summarising the complaint.

5.2.2 The Executive Director and/or relevant Assistant Executive Director/s will nominate an officer to manage the complaint, and will send an email about the complaint (with HPRM Record reference included) to the officer.

5.2.3 The nominated officer will:

- investigate the substance of the complaint
- draft the response and save it to the subfolder, and
- email the response to the relevant Director/s for review and approval.

5.2.4 Once approval has been received from the Assistant Executive Director or Executive Director, the nominated officer will email the approved draft response (with HPRM Record reference) to the Principal Consultant, Policy and Planning for referral, proof-reading and/or incorporation of any comments/feedback. Any changes requested by Principal Consultant, CASP must be authorised by the relevant Assistant Executive Director.

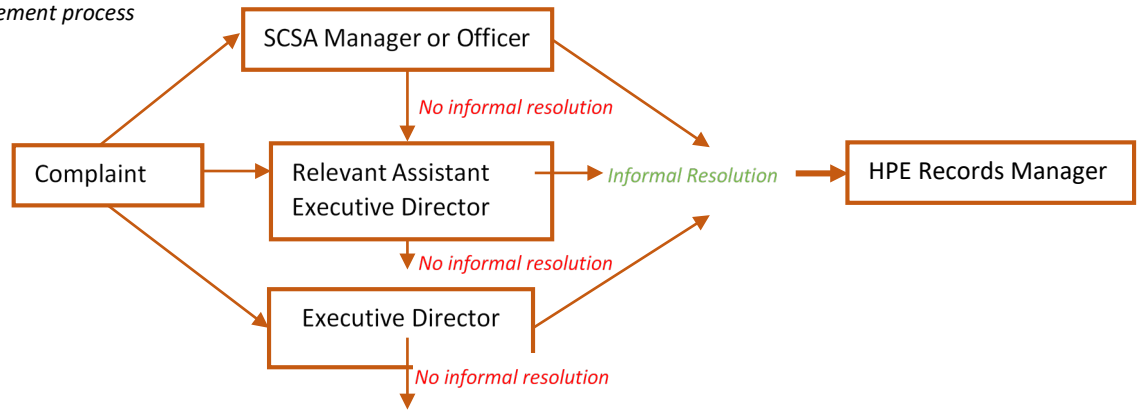
5.2.5 The Principal Consultant, CASP will email the approved response to the Executive Director for approval and/or editing.

5.2.6 Once approval has been received from the Executive Director, the Principal Consultant, Curriculum, Assessment and Strategic Policy will send the approved response letter to the complainant and save a PDF signed copy of the response as the latest version of the response document.

5.2.7 The Executive Director and/or relevant Assistant Executive Director/s will manage any further interaction with the complainant.

¹ Although similar in principle, it is understood that, for reasons of security and sensitivity, the Examination Services Directorate maintains its own procedures and database for the management of formal complaints. The process for the management of formal complaints relevant to International Education – see Appendix A

Figure 1. Complaints Management process



Formal Complaint Submission (requirements)

- Written format (letter, email, or entry via 'complaints' link on front page of SCSA website, leading to info@scsa.wa.edu.au)
- Complainant identified
- Contact details of complainant included
- Related to function of the Authority

Principal Consultant, Curriculum, Assessment and Strategic Policy (CASP)

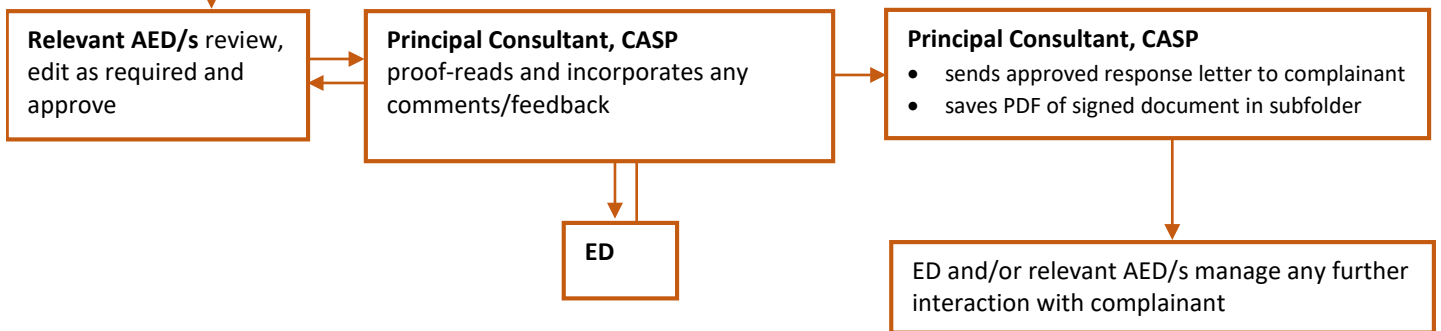
- creates a dedicated subfolder within the complaint file for complaint management
- registers the complaint in HPRM using the Complaint Register Record Type and save the complaint document to the subfolder
- sends an acknowledgement letter to complainant within five working days and saves it into subfolder
- sends an email with attached complaint (using HPRM records reference option) to the Executive Director (ED) and/or relevant Assistant Executive Director/s (AED) summarising the complaint and causing a workflow to be initiated.

Executive Director, School Curriculum and Standards

- nominates an appropriate officer to investigate the substance of the complaint and draft a response
- sends email about complaint (with HPRM record reference) to the nominated officer.

Nominated Officer

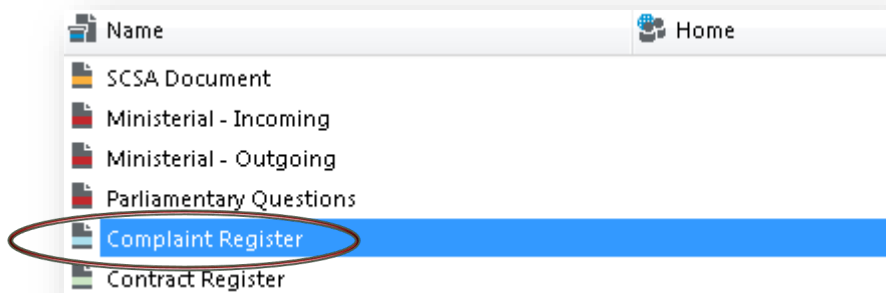
- investigates substance of complaint
- emails draft of response to the relevant AED/s for review and approval
- (when approved) emails approved draft response (with HPRM record reference) to Principal Consultant, CASP for referral, proof-reading and/or incorporation of any comments/feedback. International Education see Appendix A



5.3 Recordkeeping of complaints

5.3.1 Complaint register

- The Authority will maintain Complaint Register, which will
 - assist the Authority in identifying key risk areas
 - help eliminate the underlying causes of complaints through corrective actions, and
 - provide adequate data for audit purposes and the annual report.
- All complaints will be recorded on the Authority's complaints register in HPRM by the **Principal Consultant, CASP**. The complaints are to be registered using the Complaint Register Record Type and assigned to the appropriate subfolder created especially for management of that complaint.



A screenshot of the 'New Complaint Register' dialog box. The form contains the following fields and options:

Record Actions	Contacts	Update Security and Access Policy
SCSA Complaint	Display and/or Modify Notes	Related Records

Subject of complaint: [Text Field]

Date Registered: 22/01/2016 1:05:43 PM

Date Created: 22/01/2016 1:05:43 PM

Complaint Format: Email

Area of complaint: [Text Field]

Author: [Text Field]

Actioning Officer: [Text Field]

Responding Officer: [Text Field]

File Number: [Text Field]

Enclosed?

Date Response Sent: [Text Field]

Buttons: OK, Cancel, Help

5.3.2 Filing system for complaint management

- At the beginning of each financial year, the Corporate Records Management team will create an electronic file for the management of complaints (e.g. CR0134 COMMUNITY RELATIONS – PUBLIC REACTION – Complaints – 2020/2021)
- Because the file that houses complaint documentation is electronic only, hard copy incoming correspondence, once captured on HPRM, must be forwarded to the Corporate Records Management team for further processing and storage purposes.
- The Principal Consultant, Policy and Planning will create an appropriate subfolder within the complaints electronic file for each complaint received.
- The subfolder must be adequately titled to enable efficient records retrieval, e.g. [Name of complainant] [Subject].

Table 1. An example of complaint filing system

HPRM file title	Subfolder
CR0134 COMMUNITY RELATIONS – PUBLIC REACTION – Complaints – 2015/2016	CR0134/01
	Adam Walker – Media Production and Analysis course content
	CR0134/02 Julie Black (parent) – History WACE exam 2015
	CR0134/03 Sue Flu – Web design and accessibility

- Examples of records to be filed include, but are not restricted to, the following:
 - correspondence or email received with provided description of the issue of complaint
 - acknowledgment letter of complaint received forwarded to the complainant
 - records of discussion with the complainant, both via phone/face-to-face or electronic, in order to clarify or resolve the lodged complaint (e.g. Telephone Conversation Form 2010/10435), if applicable
 - supporting documents, if any
 - records of immediate action taken
 - records of investigation, including witness statements, if any, and
 - drafts and final written response sent to the complainant.

6. Relevant documents

6.1 Authority documents

School Curriculum and Standards Authority 2015, *Policy Register* (TRIM No: 2014/20738v2), Perth

School Curriculum and Standards Authority 2014, *Regulatory frameworks for SCSA policies and policy-related documents* (TRIM No: 2014/6347v3), Perth

Disputes and Complaints Policy Department of Education 2007

<http://det.wa.edu.au/policies/detcms/policy-planning-and-accountability/policies-framework/policies/disputes-and-complaints.en?cat-id=3457094>

6.2 Legislation and other regulatory frameworks

School Curriculum and Standards Authority Act 1997, viewed 5 December 2015

https://www.slp.wa.gov.au/legislation/statutes.nsf/main_mrtitle_233_homepage.html

School Curriculum and Standards Authority Regulations 2005, viewed 5 December 2015

http://www5.austlii.edu.au/au/legis/wa/consol_reg/scasar2005560/

School Education Act 1999, viewed 5 December 2015

https://www.slp.wa.gov.au/legislation/statutes.nsf/main_mrtitle_11599_homepage.html

Public Sector Commissioner's Circular 2009–27 – Complaints Management, viewed 5 December 2015

<https://publicsector.wa.gov.au/document/public-sector-commissioners-circular-2009-27-complaints-management>

Australian Complaint Handling Standard ISO AS 10002–2006, viewed 5 December 2015

<https://www.saiglobal.com/PDFTemp/Previews/OSH/AS/AS10000/10000/10002-2006.pdf>

A whole of government complaints management policy

<https://www.wa.gov.au/content/complaints>

Public Service Management Act 1994

Appendix A: Process for Management of complaint – International Education

The Authority's International Education team engage with a diverse range of overseas schools that seek to expand their international curriculum offerings through the delivery of Western Australian (WA) curriculum programs. In addition to curriculum delivery, these schools oversee the management of the school, staff, students and infrastructure.

Procedures are required to address potential complaints associated with the licencing of Western Australian curriculum programs.

This procedure explains how the Authority will manage complaints related to the International Education program.

The following process may assist Authority officers in International Education School Curriculum and Standards Authority in the management of a complaint delegated to them by the Manager, Strategic and External Relations.

1.1. Initial receipt of complaint

1.1.1. Any Authority officer receiving a complaint either face-to-face, by phone or electronically will try to resolve the complaint at the first point of contact, in accordance with the Complaint Management procedure, without the need for internal escalation, where appropriate to do so.

At the first point of contact, an Authority officer may attempt to resolve complaints at the first point of contact such as those related to:

- a course syllabus
- the Expression of Interest (EOI) process for schools applying for Authority licencing
- locating resources or application forms on the Authority website
- clarification of Authority processes such as document reviews
- the timing of professional development or moderation activities
- feedback via email or phone call from an Authority officer that is yet to be received
- Authority emails being blocked or access to SIRS not being available.

1.1.2. A complainant wishing to make a formal complaint will be advised that it must be submitted in the form of a letter or an email and this may be completed via the 'Complaints' link (<http://www.scsa.wa.edu.au/complaints> provided on the front page of the Authority website, which leads to info@scsa.wa.edu.au).

1.2. Processing of formal complaint in International Education

1.2.1. When a complaint has been delegated to an officer by the Manager, Strategic and External Relations, the delegated officer will discuss:

- the formal complaint with the Manager, Strategic and External Relations
- with relevant members of the International Education team and other stakeholders identified in discussion with Manager.

1.2.2. The delegated officer will commence the investigation and:

- review previous communication with the complainant
- if applicable, review school data such as school/teacher engagement with Authority professional learning and/or moderation processes, subject-specific Course achievement or student achievement data, as appropriate
- determine the appropriate communication strategy to address the complaint
- draft a response to the complainant and save in the designated HPRM folder
- email the draft response to the Manager, Strategic and External Relations.

1.2.3. The Manager, Strategic and External Relations, will:

- review the draft response
- escalate, if appropriate, to the Assistant Executive Director (CASP)
- submit draft response to Assistant Executive Director, CASP

Note: the complaint will be discussed at the next International Education Advisory Committee (IEAC) meeting.

1.2.4. Once approval has been received from Assistant Executive Director, the Manager, Strategic and External Relations, will:

- email the approved draft response (with HPRM Record reference) to the Principal Consultant, CASP.

1.2.5. The Principal Consultant, CASP will email the approved response to the Executive Director for approval and/or editing.

1.2.6. Once approval has been received from the Executive Director, the Principal Consultant, CASP will send the approved response letter to the complainant and save a PDF signed copy of the response as the latest version of the response document.

1.2.7. The Executive Director and/or relevant Assistant Executive Director/s will manage any further interaction with the complainant.
