



# Child Safety and Safeguarding Program

## Child Safeguarding Complaints Management Policy and Procedures

### Background

St Patrick's College is a Catholic School in the Edmund Rice tradition. The charism of Blessed Edmund Rice expressed through the touchstones of Liberating Education, Gospel Spirituality, Inclusive Community, Justice and Solidarity, underpins our continued commitment to a safe and inclusive environment for all.

St Patrick's College is a Catholic day and boarding college for boys in the Edmund Rice tradition, established in 1893. St Patrick's College is committed to providing a caring, supportive, and safe environment where every student has a place, a voice and their story is known.

The EREA VSL Board, the College's and the Boarding School's governing authority, has approved St Patrick's College's Child Safeguarding Complaints Management Policy and Procedures, as set out in the Policy Administration section, below.

### St Patrick's College's Statement of Commitment to Child Safety

All children and young people have a right to feel safe and be safe.

St Patrick's College is committed to embedding a culture where the safety, wellbeing, and participation of all children and young people under our care is paramount. Particular attention is given to the needs of vulnerable children and young people, including Aboriginal and Torres Strait Islander children and young people, children and young people with disability and mental health

issues, children and young people from culturally and/or linguistically diverse backgrounds, children and young people who are unable to live at home, and those who identify as lesbian, gay, bisexual, transgender or intersex. We are committed to at all times acting in the best interests of children and young people.

We have no tolerance for child abuse and all allegations and safety concerns are treated very seriously and consistent with our robust safeguarding policies and procedures. St Patrick's College is committed to nurturing the wellbeing of all children and young people, respecting their dignity, ensuring their safety and protecting them from abuse and other harm. St Patrick's College and its School-Based Staff, Contractors and Volunteers have legal and moral obligations to respond swiftly, including contacting authorities where relevant when we are concerned about a child's safety, which we follow rigorously.

St Patrick's College is committed to providing a 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.

At St Patrick's College we have zero tolerance for child abuse and are committed to acting in our students' best interests and keeping them safe from harm.

St Patrick's College regards its child safeguarding, wellbeing, and protection responsibilities with the utmost importance and as such, is committed to providing the necessary resources to ensure compliance with all relevant child safety, wellbeing and protection laws and regulations and maintain a child-safe culture.

## Purpose

St Patrick's College (**the College**) is committed to providing a safe and supportive learning environment. From time to time, staff can sometimes feel aggrieved about something that is happening at the College particularly regarding child safeguarding that they believe requires attention, further investigation or change in procedures or a resolution.

The College endeavours to ensure that complaints are managed and resolved fairly and in a timely manner.

Under Standard 7 of the Victorian Child Safe Standards, the College must have and implement child-focused processes for managing complaints and concerns. To meet this Standard, Ministerial Order

1359 requires The EREA VSL 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 College or the Boarding School, or the behaviour of any person within the College or the Boarding School
  - the roles and responsibilities of leadership, School-Based Staff, School Boarding Premises Staff and Volunteers in relation to complaints handling
  - the process for dealing with different types of complaints, breaches of relevant policies or the Child Safeguarding Code of Conduct (Vic), 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 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.

A child-focused complaints handling system is important for helping students and others at the College make complaints, whether about child safety or otherwise.

This Policy and its Procedures support 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.

They set out how the College, as a child safe organisation:

- has and implements a child-focused complaints handling system
- manages child safeguarding-related complaints.

## Principles

EREA Victorian Schools Ltd. (EREA VSL) and St Patrick's College are committed to ensuring the safety, wellbeing, and participation of all students.

The EREA VSL Board and St Patrick's College have a moral, legal and mission-driven responsibility to create nurturing College environments where children and young people are respected and their voices heard, and where they are safe and feel safe.

Ministerial Order 1359 and the EREA VSL Safeguarding Framework set out the principles that guide The EREA VSL Board and St Patrick's College in the development and regular review of the Child Safeguarding Complaints Management Policy and Procedures.

## Scope

For the purposes this Policy and its Procedures, references to the College include the Boarding School.

This Policy and its Procedures apply to all School-Based Staff, including School Boarding Premises Staff, Volunteers and Contractors.

They apply in all College and Boarding School environments (together referred to as College environments) within the meaning of Ministerial Order 1359, including physical, virtual and online environments used during or outside school hours, on-site and off-site College grounds (e.g. extra-curricular activities such as sport and other programs, camps and excursions, interstate and overseas travel), and environments provided by External Education Providers and other Contractors.

## Definitions

Definitions of particular terms used in this Policy and its Procedures can be found in the [Child Safety and Safeguarding Policy: Master Definitions List](#) and [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#).

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

### Child Abuse and Other Harm

The term "child abuse" means:

- any act committed against a child involving:
  - a sexual offence
  - grooming offences under section 49M(1) of the Crimes Act 1958

- the infliction, on a child, of:
  - physical violence
  - serious emotional or psychological harm
- the serious neglect of a child.

As the definition of “child abuse” in the Child Wellbeing and Safety Act 2005 (Vic) (CWA Act) is quite limited, “other harm” refers to other kinds of harm to children and young people, that must be reported internally to the College and that must be responded to in accordance with the Child Safeguarding Reporting and Responding Policy and Procedures.

“Other harm” includes:

- children and young people who may be “in need of protection”, as set out in the Children, Youth and Families Act 2005 (Vic) (CYF Act)
- children and young people who may be “in need of therapeutic treatment for sexually abusive behaviours,” as set out in the CYF Act
- other situations in which there are significant concerns for the wellbeing of a child or young person such that a report should be made to DFFH Child Protection under the CYF Act or to Child First/the Orange Door
- children and young people who may be subjected to sexual orientation or gender identity change or suppression practices, which are prohibited by the Change or Suppression (Conversion) Practices Prohibition Act 2021 (Vic).

For more information, refer to the Definitions section of [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#).

## Complaint

A “complaint” means an expression of dissatisfaction made to EREA VSL or one or more of its schools, related to our services or operations, or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.

A complaint might come from a number of sources, such as a student, former student, parent/carer, other family member, School-Based Staff member, Volunteer, Contractor or member of the wider community.

## Child Safeguarding-Related Complaint

A “child safeguarding-related complaint” means any disclosure, allegation, suspicion, concern or internal report of:

- a breach of the College’s Child Safeguarding Codes of Conduct
- 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
- child safety incidents or concerns involving School-Based Staff, Volunteers, Contractors or students
- other School-Based Staff misconduct related to the Child Safety and Safeguarding Program (such as a procedural breach of the Child Safety and Safeguarding Program).

A child safeguarding-related complaint also includes any complaint about the College’s response to or management of a child safety incident or concern, including complaints alleging non-compliance with our [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#).

## Roles and Responsibilities

Roles and responsibilities relevant to child safeguarding at the College in general are set out in the College’s [Child Safeguarding Safety and Wellbeing Policy and Procedures](#), available on our public website.

The following roles have additional responsibilities under this Policy and its Procedures:

- All [School-Based Staff and Volunteers](#) are responsible for responding appropriately to a student who raises or is affected by a child safeguarding-related complaint
- All [School-Based Staff and Volunteers](#) are responsible for understanding their internal and external reporting requirements relevant to child safeguarding-related complaints and for complying with this Policy and its Procedures and the Child Safeguarding Reporting and Responding Obligations Policy and Procedures
- The [Complaints Officer](#) is a School-Based Staff member who receives complaints and refers them to the appropriate Complaints Manager (as directed by the Principal) either within the College or at the EREA VSL office. The Complaints Officer is usually a nominated member of School-Based Staff, likely from the Administrative team, but in their absence may be any School-Based Staff member
- The [Complaints Manager](#) is appointed by the Principal (or in their absence the Deputy Principal) on a case-by-case basis, being the most appropriate person to respond to the complaint. For child safeguarding-related complaints, this will most often be one of the College’s Child

Safeguarding Officers. The Complaints Manager manages the confidential and complete response, including by providing a final report to the Principal and associated parties, to complaints raised at the College level

- The College's Child Safeguarding Officers and the Principal are responsible for:
  - providing assistance and advice to Staff about their obligations under this Policy and its Procedures and the Child Safeguarding Reporting and Responding Obligations Policy and Procedures
  - ensuring that all child safeguarding-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 safeguarding-related complaint
  - promptly and thoroughly managing the College's response to child safeguarding-related complaints as set out in the Procedures below
  - monitoring the College's compliance with this Policy and its Procedures
- The Principal is responsible for monitoring the overall compliance of the College's services with this Policy and its Procedures at the College level
- Where a particular child safeguarding-related complaint involves the Principal and they therefore cannot perform the above roles, the Director of Human Resources, Risk and Compliance Mr. Jamie Bobrowski undertakes these responsibilities
- The EREA VSL Board ensures that the College captures, analyses and, where appropriate, acts on child safety incidents and concerns that occur at or involve the College, as well as any child safeguarding-related feedback, comments or complaints from College community members and relevant stakeholders, as set out in the EREA VSL Safeguarding Framework
- The EREA VSL Board is the College's and the Boarding School's "governing authority" for the purposes of Ministerial Order 1359, and is responsible for approving this Policy and its Procedures.

NB. Fulfilling the roles and responsibilities contained in this Policy and its Procedures does not displace or discharge any other obligations that arise if a person reasonably believes that a child is at risk of child abuse or other harm.

## St Patrick's College's Policy

1. The College'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.

2. The College's system for handling complaints that involve students (whether as complainant, victim, witness or person being complained about) is culturally safe. We consult with relevant communities (the variety of communities that are relevant to the College, such as Aboriginal and Torres Strait Islander communities, culturally and linguistically diverse communities, and other communities that make up our School-Based Staff and student cohort) about how to enable, support and respond to complaints in a culturally sensitive way.

3. If the complaint relates to concerning or harmful sexual behaviour by a student, we follow the procedure set out in the [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#).

4. As set out in **Making a Child Safeguarding-Related Complaint** below, the College provides:

- simple age and culturally appropriate avenues for students, School-Based Staff, Volunteers, Contractors, parents/carers and the wider community to make a complaint, including child safeguarding-related complaints
- confidentiality and accessibility for all members of the College community.

5. The College supports students, families, and relevant School-Based Staff, Volunteers and Contractors involved in a child safeguarding-related complaint in age and culturally appropriate ways, as set out in the Support Following Child Safety Incident or Disclosure section of our **Managing Your Initial Response to a Child Safety Incident or Concern Policies and Procedures** (Appendix 1) and outlined in Critical Action 4 of PROTECT.

6. The College, and its School-Based Staff members, **must** respond to child safeguarding-related complaints by following our [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#) together with the **Procedures** set out below in:

## • **Responding to Child Safeguarding-Related Complaints – School-Based Staff Members' Obligations**



- **Managing Child Safeguarding-Related Complaints – the College’s Obligations**
- **Internal Reviews of Child Safeguarding-Related Complaint Outcomes**
- **External Reviews for Overseas Students**

7. Records of complaints that contain information about child safety incidents or concerns must not be held within our general Complaints Handling record keeping system, because of the confidentiality and privacy issues that arise with respect to child safety incidents and concerns. These complaints are instead recorded as a child safety incident or concern, and retained and secured under our [Child Safeguarding Record Keeping Policy and Procedures](#).

8. The College regularly reviews and analyses child safeguarding-related complaints to inform the continuous improvement of the College’s Child Safety and Safeguarding Program and practices, as set out in **General Reviews of Child Safeguarding Complaints Management**, below, and [Child Safeguarding Regular Reviews and Continuous Improvement Policy and Procedures](#).

9. The Principal reports all child safety incidents or concerns that occur at the College or involve its School-Based Staff members, including those raised in child safeguarding-related complaints, to EREA VSL as soon as practicable after the College becomes aware of the incident or concern.

10. The EREA VSL Board analyses the College’s child safeguarding-related complaint reports and, where appropriate, directs and monitors improvements to the College’s approach to child safety incidents or concerns. It also regularly reviews the College’s Child Safeguarding Complaints Management Policy and Procedures. For more information, refer to [Child Safeguarding Regular Reviews and Continuous Improvement Policy and Procedures](#).

## Procedures

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

(a) Anyone can, at any time, make a child safeguarding-related complaint to:

- the Principal
- a Child Safeguarding Officer
- a trusted staff member
- the Complaints Officer

in person, in writing or over the phone.

Non-child safeguarding-related complaints should be made to the Complaints Officer.

(b) Parents/carers, family members and other community members who have child safeguarding concerns or who wish to make a child safeguarding-related complaint about the College, its students or School-Based Staff members are asked to follow the procedures set out in our Child Safeguarding Safety and Wellbeing Policy and Procedures and to contact:

- the College's Senior Child Safeguarding Officer Director of Human Resources, Risk & Compliance - Mr Jamie Bobrowski, by phoning **03 5322 4477 / 4022004244** or emailing [jbobrowski@stpats.vic.edu.au](mailto:jbobrowski@stpats.vic.edu.au)
- the Boarding School Senior Child Safeguarding Officer Acting Deputy Principal - Carol Roberts by phoning **03 5322 4432** or emailing [caroberts@stpats.vic.edu.au](mailto:caroberts@stpats.vic.edu.au)
- the Principal or, if the concern relates to the Principal, the EREA VSL Chief Executive Officer or the Director of Human Resources, Risk and Compliance Mr. Jamie Bobrowski.

(c) Students have multiple pathways to raise a concern or make a complaint, including child safeguarding-related complaints, at the College, which are included in the child-friendly version of our Child Safeguarding Complaints Management Policy and Procedures. 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 School-Based Staff member. This might be done:
  - verbally
  - in writing
  - through electronic means (such as email)
  - indirectly (such as in written assignments, in artworks or in any other way)
- using the College's anonymous 'Let's Talk' is a St Patrick's College initiative designed for students to anonymously access help internally and externally of St Patrick's College., which is located Significant and easily available locations around the College including YLC offices,

Counsellor offices, 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
  - Headspace - [https://headspace.org.au/?gclid=EAlaIqObChMlylvz-vyN-AIVNIZLBR0JswCrEAAYASAAEgKn\\_vD\\_BwE](https://headspace.org.au/?gclid=EAlaIqObChMlylvz-vyN-AIVNIZLBR0JswCrEAAYASAAEgKn_vD_BwE)
  - The Orange Door - <https://www.orangedoor.vic.gov.au/>
  - eSafety Commission - [https://www.esafety.gov.au/?gclid=EAlaIqObChMloKiApP2N-AIVCplmAh05hgW3EAAYASAAEgLYZyFD\\_BwE&gclsrc=aw.ds](https://www.esafety.gov.au/?gclid=EAlaIqObChMloKiApP2N-AIVCplmAh05hgW3EAAYASAAEgLYZyFD_BwE&gclsrc=aw.ds)
  - Beyond Blue – Young People - <https://www.beyondblue.org.au/who-does-it-affect/young-people>

NB. At St Patrick's College, the process for reporting a complaint or concern does not:

- prohibit or discourage School-Based Staff, School Boarding Premises Staff or Volunteers from reporting a complaint or concern relating to child abuse to a person external to the College or Boarding School
- state or imply that it is the victim's responsibility to inform the Police or other authorities of an allegation relating to child abuse
- require School-Based Staff, School Boarding Premises Staff or Volunteers to make a judgment about the truth of a complaint or concern relating to child abuse
- prohibit School-Based Staff, School Boarding Premises Staff or Volunteers from making records in relation to a complaint or concern relating to child abuse.

## **2. Responding to a Child Safeguarding-Related Complaint – School-Based Staff Members' Obligations**

### **(a) Support for Complainants**

Whenever a complaint containing information about child safety incidents or concerns is received, the School-Based 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 our [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#) and the Support Following Child Safety Incident or Disclosure section of our [Managing Your Initial Response to a Child Safety Incident or Concern Policies and Procedures](#) (Appendix 1).

Where the complaint relates to a historical 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.

## **(b) Internal and External Reporting of Complaint Information**

All School-Based Staff members must follow the College's [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#) 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 College or a College event, within the home or community, or from a School-Based Staff member. This includes in particular:

- Reporting a Child Safety Incident or Concern Internally
- Mandatory Reporting to Child Protection
- Non-Mandatory Reporting to Child Protection
- Reporting to Police
- Reporting Reportable Conduct internally or to the CCYP
- Reporting Teacher Misconduct to the Victorian Institute of Teaching

All School-Based Staff members must also report any child safeguarding-related complaint that is made to them to a Child Safeguarding Officer or the Principal.

If a child safeguarding-related complaint is about the Principal, the complaint must be referred to the Director of Human Resources, Risk and Compliance Mr. Jamie Bobrowski.

## **3. Managing Child Safeguarding-Related Complaints – The College's Obligations**

The College manages child safeguarding-related complaints as follows:

### **(a) Child safeguarding-related complaints that involve, or raise the possibility of a risk of, child abuse or other harm to a child or young person are managed under the Child Safety and Safeguarding Program**

The following child safeguarding-related complaints must be managed pursuant to any relevant policies and procedures in this Child Safety and Safeguarding Program:

1. complaints involving, or raising the possibility of a risk of, child abuse or other harm occurring at the College or a College event, or by a School-Based Staff member
2. complaints alleging a breach of the Child Safeguarding Codes of Conduct that involves, or raises the possibility of a risk of, child abuse or other harm by a School-Based Staff member.

All School-Based Staff members must immediately refer these kinds of child safeguarding-related complaints to the Principal to be managed pursuant to relevant policies and procedures in our Child Safety and Safeguarding Program. If the complaint involves the Principal, the complaint must be referred to the EREA VSL Chief Executive Officer or the Director of Human Resources, Risk and Compliance Mr. Jamie Bobrowski).

The Principal may, where appropriate, delegate management of these kinds of child safeguarding-related complaints to a Child Safeguarding Officer.

Relevant policies and procedures for managing these kinds of child safeguarding-related complaints include, but are not limited to, the **Reportable Conduct, Reporting Teacher Misconduct to the Victorian Institute of Teaching, Mandatory Reporting to DFFH Child Protection, Reporting to Police and Duty to Protect/Failure to Protect** sections of the [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#).

## **(b) Other child safeguarding-related complaints that are managed under the Child Safety and Safeguarding Program**

The following child safeguarding-related complaints must be managed pursuant to any relevant policies and procedures in this Child Safety and Safeguarding Program:

1. complaints about the College's investigation of and/or response to a specific incident of or concern about child abuse and other harm to a child or young person
2. complaints that the College, when responding to a specific incident of or concern about child abuse and other harm to a child or young person, has not correctly followed the College'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 Policy and Procedures)
3. complaints that the College has not followed specific legislative or regulatory requirements regarding child safeguarding in relation to a specific incident of or concern about child abuse or

other harm to a child or young person (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).

These kinds of child safeguarding-related complaints must be immediately referred to the Principal (or if the complaint involves the Principal, the EREA VSL Chief Executive Officer or the Director of Human Resources, Risk and Compliance Mr. Jamie Bobrowski) to be managed pursuant to relevant policies and procedures in the Child Safety and Safeguarding Program.

The Principal may, where appropriate, delegate management of these kinds of child safeguarding-related complaints to a Child Safeguarding Officer.

Relevant policies and procedures for managing these kinds of child safeguarding-related complaints include, but are not limited to, Child Safeguarding Compliance and Breach Policy and Procedures and Child Safeguarding Regular Reviews and Continuous Improvement Policy and Procedures.

*(c) Child safeguarding-related complaints that may be managed under other College policies and procedures*

The following child safeguarding-related complaints may be managed pursuant to other relevant College policies and procedures:

1. complaints alleging a breach of the Child Safeguarding 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 or young person by a School-Based Staff member (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 Safety and Safeguarding Program by School-Based Staff that **do not** involve, and **do not** raise the possibility of a risk of, child abuse or other harm to a child or young person (for example, a complaint that a School-Based Staff member has not renewed their WWC clearance)
3. general complaints about our child safeguarding 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).

Although these kinds of child safeguarding-related complaints may be managed pursuant to other relevant College policies, the Complaints Officer or other person managing the complaint should – where appropriate - consult with a Child Safeguarding Officer as part of the investigation.

With respect to 3. above, given the high risk to the College of not having a compliant Child Safety and Safeguarding Program, it is likely that the outcome of these kinds of complaints will need to be

reported to The EREA VSL Board.

Relevant policies and procedures for managing these kinds of child safeguarding-related complaints include, but are not limited to, our [Complaints Handling Program](#) and/or our [Human Resources](#) policies and procedures.

## **(d) Guidance and Resources for Managing Child Safeguarding-Related Complaints**

The [Complaints Handling Program](#) provides guidance on complaints handling principles and a step-by-step guide to managing a complaint.

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](#).

Our Reportable Conduct Policies and Procedures and Reporting Teacher Misconduct to the Victorian Institute of Teaching Policy and Procedures set out procedures that the College will follow for complaints about inappropriate conduct by School-based Staff members.

### **4. Internal Reviews of Child Safeguarding-Related Complaint Outcomes**

Complainants or other persons who are involved in the matter (for example, a School-Based 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) and who are not satisfied with the management of a child safeguarding-related complaint or its outcome may request an internal review of:

- 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).

Requests for internal reviews should be made to the The Principal.

Internal reviews are undertaken by the College Executive.

## 5. General Reviews of Child Safeguarding Complaints Management

The College's review and analysis of child safeguarding-related complaints aims to identify causes and systemic failures to inform continuous improvement.

The Incident Notification Policy sets out how the College reports child safety incidents or concerns that occur at the College or involve its School-Based Staff members, including those raised in child safeguarding-related complaints, to EREA VSL.

The EREA VSL Board ensures that the College captures, analyses and, where appropriate, acts on any child safeguarding-related feedback, comments or complaints from College community members and relevant stakeholders, as set out in the EREA VSL Safeguarding Framework.

For more information, refer to [Child Safeguarding Regular Reviews and Continuous Improvement Policy and Procedures](#).

## 6. External Reviews for Overseas Student

If an overseas student is not satisfied with the outcome of the College's internal complaints handling process, they may lodge an external appeal through the Overseas Students Ombudsman (OSO) which investigates complaints about problems that overseas students or intending overseas students may have with private education and training in Australia. The services of the OSO are free. The contact details for the OSO are as follows:

- Email: [ombudsman@ombudsman.gov.au](mailto:ombudsman@ombudsman.gov.au)
- Call: 1300 362 072 within Australia. Outside Australia call +61 2 6276 0111.
- Enquiries: 9:00am to 5:00pm Monday to Friday, Australian Eastern Standard Time (Australian Eastern Daylight Time when daylight savings is in effect)
- Postal: Commonwealth Ombudsman, GPO Box 442 Canberra ACT 2601.
- Website: <https://www.ombudsman.gov.au/complaints/international-student-complaints>

The College agrees to be bound to the OSO's recommendations, and will ensure that any recommendations made are implemented within 30 days of receipts of the report.

## Implementation



This Policy and its Procedures are made available to all School-Based Staff, Volunteers, and Contractors, via the College's PolicyConnect site. The policies and procedures are included in induction training and in ongoing refresher training for School-Based Staff and relevant Volunteers and Contractors. For more information, refer to [Child Safeguarding Training and Supervision Policy and Procedures](#).

These policies and procedures are made accessible to parents/carers, students and the wider College community in summary in our Child Safeguarding Safety and Wellbeing Policy and Procedures, our Available on College website. and our Child Safeguarding Complaints Management Policy and Procedures (a community friendly version of our Child Safeguarding Reporting and Responding Policy and Procedures), which are available on our public website, as well as by communicating them through Complispace-PolicyConnect and Staff Learning Systems, SafeTripBuilder, Passtab, College Website, Contracts, Newsletters, Annual Reports, Annual briefings and the Crest..

They are also available in hard copy by request.

The College makes this Policy and its Procedures accessible to students by providing a child-friendly version to all students and by communicating them through Policy Connect.

A child-friendly version of this Policy and its Procedures is also provided to students.

## **Breach of Child Safeguarding Complaints Management Policies and Procedures**

St Patrick's College enforces this section of our Child Safety and Safeguarding Program. In the event of any non-compliance, we will instigate a review, in a timely and fair manner, that may result in a range of measures including (depending on the severity of the breach):

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

For more information, refer to [Child Safeguarding Compliance and Breach Policy and Procedures](#).

# Policy Review

A review of the Child Safeguarding Complaints Management Policy and Procedures is conducted every two years or earlier if required, such as due to changes in legislation or after any significant child safety incident.

The EREA VSL Board is responsible for ensuring that this Policy and its Procedures are reviewed and updated as needed and for approving this Policy and its Procedures.

## EREA VSL and St Patrick's College Policy and Procedures Linkages

- [Child Safeguarding Reporting and Responding Obligations Policy and Procedures](#)
- [Sharing Information Relating to a Student's Safety and Wellbeing Policies and Procedures](#)
- [Child Safeguarding Compliance and Breach Policy and Procedures](#)
- [Child Safeguarding Regular Reviews and Continuous Improvement Policy and Procedures](#)
- Anonymous Feedback Mechanism

## Source of Obligation and Related Legislative Instruments

- [Ministerial Order 1359](#), Clauses 11.1 and 11.2

## Related Forms and Documents

- Available on College website.

## Resources and References

National Office of Child Safety, [Complaint Handling Guide: Upholding the rights of children and young people](#)

# Policy Administration

<b>Responsible Officer</b>	<b>EREA VSL Chief Executive Officer</b>
Policy Owner	EREA VSL Director of Safeguarding
Approving Body	EREA VSL Board
Approval Date	February 2024
Risk Rating	High
Date of next review	February 2026
<b>Policy Database Information</b>	
Version	1.0
Related Documents	
Superseded Documents	

## Appendices

### Appendix 1

## Managing Your Initial Response to a Child Safety Incident or Concern Policies and Procedures: Support Following Child Safety Incident or Disclosure