



COMPLAINTS MANAGEMENT (CHILD SAFE) POLICY

The Child Safe Adult Code of Conduct outlines appropriate standards of behaviour for all adults in Good Shepherd Lutheran School Para Vista environment towards students. It serves to protect students, reduce any opportunities for harm or risk of harm to students to occur, and promote child safety in the Good Shepherd Lutheran School Para Vista environment. It provides guidance on how to best support students and how to avoid or better manage difficult situations.

It is the Good Shepherd Lutheran School Para Vista's policy that any breach of the Child Safe Code of Conduct is a child safe incident that must be reported internally. Any breach that meets the threshold for external reporting must also be reported to the relevant external authority.

The Child Safe Code of Conduct is published on our public website.

Our Child Safe Program also includes a Staff and Student Professional Boundaries Policy that provides detailed guidance for all Staff, Volunteers, Contractors and External Education Providers on how to maintain professional boundaries between students and adults at Good Shepherd Lutheran School Para Vista.

Good Shepherd Lutheran School Para Vista reviews the Child Safe Code of Conduct annually.

Purpose

The Children and Young People (Safety) Act 2017 (SA) requires Good Shepherd Lutheran School Para Vista to have appropriate policies and procedures to establish and maintain child safe environments. The National Principles for Child Safe Organisations (National Principles) set out the minimum requirements that the Good Shepherd Lutheran School Para Vista must meet to do this.

National Principle 6 requires Good Shepherd Lutheran School Para Vista 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.

In addition, the Education and Early Childhood Services (Registration and Standards) Act 2011 (SA) and the Education and Early Childhood Services (Registration and Standards) Regulation 2011 (SA) say that, to be registered, the Good Shepherd Lutheran School Para Vista must comply with the Standards for Registration and Review of Registration of Schools in South Australia (SA Registration Standards), published by the Education and Early Childhood Services Registration Board (Education Standards Board). The Education Standards Board also publishes an Evidence Guide for Review of Registration (Evidence Guide) to assist schools to demonstrate compliance.

With respect to child safety and child protection, the SA Registration Standards and the Evidence Guide say that the Good Shepherd Lutheran School Para Vista must have in place, and implement, policies and procedures for managing complaints and grievances from students, parents/carers and the community.

The Complaints Handling Policy sets out how Good Shepherd Lutheran School Para Vista meets these requirements with respect to complaints made about the Good Shepherd Lutheran School Para



Vista in general. However, child safe-related complaints often have additional or different management requirements. The Responding and Reporting Obligations (Child Safe) Policy and Procedures sets out how Good Shepherd Lutheran School Para Vista and its Staff, Volunteers and Contractors must respond to all child safety incidents or concerns, including child safe-related complaints.

This Policy and its Procedures complement the Complaints Handling Policy and help Good Shepherd Lutheran School Para Vista and its Staff, Volunteers and Contractors to comply with it and with the Responding and Reporting Obligations (Child Safe) Policy and Procedures.

They outline:

- the specific procedures used at Good Shepherd Lutheran School Para Vista to enable and encourage members of the Good Shepherd Lutheran School Para Vista community to make child safe-related complaints
- the Good Shepherd Lutheran School Para Vista's processes for managing different types of child safe-related complaints
- how the Good Shepherd Lutheran School Para Vista ensures that child safe-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".

However, the terms "Staff" and "staff member" do not include students who are volunteering with, coaching or tutoring younger students at the Good Shepherd Lutheran School Para Vista. If you are a student, you must instead comply with the Student Code of Conduct and other relevant Good Shepherd Lutheran School Para Vista policies.

This Policy and its Procedures apply in all Good Shepherd Lutheran School Para Vista environments, including physical and online environments, and on-site and off-site Good Shepherd Lutheran School Para Vista grounds (e.g. camps and excursions, and interstate and overseas travel).



Definitions

Term	Definition
Complaint	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 Good Shepherd Lutheran School Para Vista. 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.
Child Safe-Related Complaint	A child safe-related complaint includes any disclosure, allegation, suspicion, concern or internal report of: • a breach of the Child Safe Codes of Conduct • a child safety incident or concern alleged to have occurred, be occurring or be at risk of occurring at the Good Shepherd Lutheran School Para Vista or a Good Shepherd Lutheran School Para Vista event • child safety incidents or concerns involving Good Shepherd Lutheran School Para Vista Staff • other staff misconduct (such as a procedural breach of the Child Safe Program) • any complaint about the Good Shepherd Lutheran School Para Vista's response to or management of a child safety incident or concern, including complaints alleging non-compliance with the Responding and Reporting Obligations (Child Safe) Policy and Procedures.

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 safe-related complaint
- understanding and complying with your internal and external reporting requirements relevant to child safe-related complaints
- complying with this Policy and its Procedures whenever you receive a child safe-related complaint.



Child Safety Contact Officers

If you are a Child Safety Contact Officer, you are responsible for:

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

The Principal

If you are the Principal, you are responsible for undertaking Child Safety Contact Officers' responsibilities above, as well as for ensuring the efficient and effective organisation, management and administration of the Good Shepherd Lutheran School Para Vista's child safe complaints handling processes.

You may authorise other people at the Good Shepherd Lutheran School Para Vista 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 Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board

If you are the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board, you are responsible for undertaking the Principal's responsibilities when they cannot perform them (for example, because they are absent or when a particular child safe-related complaint involves 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
- analysing Good Shepherd Lutheran School Para Vista's child safe-related complaints reports and, where appropriate, directing and monitoring improvements to the Good Shepherd Lutheran School Para Vista's approach to child safety incidents or concerns.



Policy Statement

1. Good Shepherd Lutheran School Para Vista's systems for handling child safe-related complaints that involve students and former students (whether as complainant, victim, witness or person being complained about) are:

- child-focused and follow 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 Good Shepherd Lutheran School Para Vista community
- regularly reviewed, to inform the continuous improvement of the Good Shepherd Lutheran School Para Vista's Child Safe Program and practices.

2. If you are the Principal, you **must** ensure that the Good Shepherd Lutheran School Para Vista:

- consults with relevant communities about how to enable, support and respond to child safe-related 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 child safe-related complaint, as set out in **Making a Child Safe-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 safe-related complaint in age and culturally appropriate ways, as set out in the **Responding and Reporting Obligations (Child Safe) Policy and Procedures**
- keeps appropriate records of all child safe-related complaints and the Good Shepherd Lutheran School Para Vista's response, as set out in **Managing Child Safe-Related Complaints - the Good Shepherd Lutheran School Para Vista's Obligations** in the **Procedures** below
- regularly reviews and analyses child safe-related complaints, as set out in the **Procedures** below
- reports all child safety incidents and concerns that occur at the Good Shepherd Lutheran School Para Vista or involve its staff members, including those raised in child safe-related complaints, to LESNW as soon as practicable after the Good Shepherd Lutheran School Para Vista becomes aware of the incident or concern
- complies with the following sections of the **Procedures** below:
 - Managing Child Safe-Related Complaints - the Good Shepherd Lutheran School Para Vista's Obligations
 - Internal Reviews of Child Safe-Related Complaint Outcomes



- o General Reviews of Child Safe Complaints Management .

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

4. If you are the Principal, the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board, or have been delegated responsibility for managing, investigating or responding to child safe-related complaints, you **must** manage child safe-related complaints as set out in **Managing Child Safe-Related Complaints – the Good Shepherd Lutheran School Para Vista’s Obligations** in the **Procedures** below.

Procedures

1. Making a Child Safe-Related Complaint

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

- to the Principal
- a Child Safety Contact Officer
- a trusted staff member

in person, in writing or over the phone.

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

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

- the Principal, who is the Good Shepherd Lutheran School Para Vista’s Senior Child Safety Contact Officer, by phoning 0422 398 640 or emailing principal@gspv.sa.edu.au; or
- if the concern relates to the Principal, the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board.

1.3 Students have multiple pathways to make a complaint, including child safe-related complaints, at Good Shepherd Lutheran School Para Vista. These include:

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



- disclosing child safety incidents or concerns, including harm to themselves or to any other child, young person or student aged 18 or over, anonymously using the Insert a Description of the Anonymous Child Protection Mechanism which is located Insert Location of Anonymous Feedback Mechanism
- Kids Helpline
Phone 1800 55 1800 (free call, 24 hours)
- Beyond Blue
Phone 1300 22 4636
www.beyondblue.org.au/getsupport
- Lutheran Care – Family Zone (Ingle Farm)
Phone (08) 8349 6099
Email inglefarm@lutherancare.org.au
Website lutherancare.org.au/family-zone/

2. Responding to a Child Safe-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 **Response and Reporting Obligations (Child Safe) Policy and Procedures**.

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 Good Shepherd Lutheran School Para Vista can be found [here](#).

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, harm:

- at Good Shepherd Lutheran School Para Vista or a Good Shepherd Lutheran School Para Vista event; or
- from a staff member

you **must** follow the **Response and Reporting Obligations (Child Safe) Policy 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 for Child Protection (Department for Child Protection's) via the Child Abuse Report Line (CARL)
 - reporting to the Police



- o taking steps to protect students from future risks of harm, where those steps are within your power or responsibilities to take (to meet your duty to protect obligations)
 - o reporting teacher misconduct to the Teachers Registration Board (TRB)
 - o providing information to other external agencies
- after first making any required external reports to CARL or the Police, report the child safe-related complaint to:
 - o a Child Safety Contact Officer or the Principal; or
 - o the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board, if the complaint involves the Principal.

3. Managing Child Safe-Related Complaints –Good Shepherd Lutheran School Para Vista’s Obligations

3.1 Child safe-related complaints that involve, or raise the possibility of a risk of, harm to a child, young person or student aged 18 or over must be managed following the Response and Reporting Obligations (Child Safe) Policy and Procedures.

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

- complaints involving, or raising the possibility of a risk of, harm to a child, young person or student aged 18 or over occurring at the Good Shepherd Lutheran School Para Vista or a Good Shepherd Lutheran School Para Vista event
- complaints involving, or raising the possibility of a risk of, harm to a child, young person or student aged 18 or over or by a staff member
- complaints alleging a breach of the Child Safe Codes of Conduct by a staff member and that involve, or raise the possibility of a risk of, harm to a child, young person or student aged 18 or over.

Relevant response and reporting obligations that apply to these kinds of child safe-related complaints include, but are not limited to:

- Duty to Protect/the Failure to Protect Offence
- Mandatory Reporting to Department for Child Protection’s
- Voluntary Reporting to Department for Child Protection’s
- Mandatory Reporting to Police
- Non-Mandatory Reporting to Police
- Child Safety Incidents or Concerns Involving the Good Shepherd Lutheran School Para Vista
- Reporting Teacher Misconduct to the TRB
- Recognising and Responding to Sexual Behaviour in Children and Young People



The Principal (or, if the complaint involves the Principal, the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board) is responsible for managing these kinds of child safe-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the Good Shepherd Lutheran School Para Vista (such as a Child Safety Contact Officer) or LESNW.

3.2 Certain other child safe-related complaints **must** be managed using relevant policies and procedures in the Child Safe Program.

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

- complaints about the Good Shepherd Lutheran School Para Vista's, or a staff member's, investigation of and/or response to a specific incident of or concern about harm to a child, young person or student aged 18 or over
- complaints that, when responding to a specific incident of, or concern about, harm to a child, young person or student aged 18 or over, the Good Shepherd Lutheran School Para Vista, or a staff member, did not correctly follow this Policy and its Procedures (for example, a complaint that a staff member did not report the complaint internally when required to by Good Shepherd Lutheran School Para Vista policy)
- complaints that the Good Shepherd Lutheran School Para Vista has not correctly followed legislative or regulatory requirements regarding child safety in relation to a specific incident of, or concern about, harm to a child, young person or student aged 18 or over (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).

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

- Child Safe Program Breach Management Policy and Procedures
- Regular Reviews and Continuous Improvement (Child Safe) Policy and Procedures.

The Principal (or, if the complaint involves the Principal, the Executive Director of LESNW, Chief Executive of AISSA, Chair of the Board) is responsible for managing these kinds of child safe-related complaints.

They may, where appropriate, delegate management of the complaint to another person at the Good Shepherd Lutheran School Para Vista (such as a Child Safety Contact Officer) or LESNW.

3.3 Certain Child safe-related complaints may be managed under other Good Shepherd Lutheran School Para Vista policies and procedures.

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

- complaints alleging a breach of the Child Safe Codes of Conduct that **do not** involve, and **do not** raise the possibility of a risk of, 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 Safe Program by Staff that **do not** involve, and **do not** raise the possibility of a risk of, to a child, young person



or student aged 18 or over (for example, a complaint that a staff member has not renewed their WWCC)

- general complaints about the child safe 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 safe-related complaints include, but are not limited to, the Complaints Handling Policy and/or Human Resources policies and procedures.

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

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

3.4 Record Keeping About Child Safe-Related Complaints

The Good Shepherd Lutheran School Para Vista 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 safe-related complaint, you must record it, and the Good Shepherd Lutheran School Para Vista's response:

- following the **Response and Reporting Obligations (Child Safe) Policy and Procedures** if it involves a child safety incident or concern
- following the **Child Safe Program Breach Management Policy and Procedures** if it does not involve a child safety incident or concern; and
- in the Good Shepherd Lutheran School Child Protection Complaints Register.

3.5 Guidance and Resources for Managing Child Safe-Related Complaints

The Complaints Handling 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 Good Shepherd Lutheran School Para Vista and Reporting Teacher Misconduct to the TRB** subsections of the **Response and Reporting Obligations (Child Safe) Policy and Procedures** set out procedures that the Good Shepherd Lutheran School Para Vista will follow for complaints about inappropriate conduct by Staff.

4. Internal Reviews of Child Safe-Related Complaint Outcomes

If a complainant or other person involved in a child safe-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 the Principal and Directors.

The Principal. undertakes these internal reviews.

5. General Reviews of Child Safe Complaints Management

Regular reviews of child safe-related complaints ensure that the Good Shepherd Lutheran School Para Vista captures, analyses and, where appropriate, acts on child safety-related feedback, comments or complaints from the Good Shepherd Lutheran School Para Vista community members and relevant stakeholders.

The **Regular Reviews and Continuous Improvement (Child Safe) Policy and Procedures** sets out Good Shepherd Lutheran School Board and the Good Shepherd Lutheran School Para Vista's procedures for conducting these reviews, as well as for reviewing this Policy and Procedures (as part of the regular reviews of the Child Safe Program).

During these reviews, the Good Shepherd Lutheran School Para Vista analyses child safe-related complaints, to identify causes and systemic failures and to inform continuous improvement.

Implementation

The Good Shepherd Lutheran School Para Vista implements this Policy and its Procedures through:

- making them available to all Staff, via the Good Shepherd Lutheran School Para Vista'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 Good Shepherd Lutheran School Para Vista community in summary in the Child Safe Policy and Complaints Handling 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 Good Shepherd Lutheran School Para Vista 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.

Source of Obligation

This Policy and its Procedures help the Good Shepherd Lutheran School Para Vista and its Staff, Volunteers and Contractors to meet obligations in:

- Children and Young People (Safety) Act 2017 (SA) section 114
- National Principles for Child Safe Organisations, Principle 6
- Education and Early Childhood Services (Registration and Standards) Act 2011 (SA)
- Education and Early Childhood Services (Registration and Standards) Regulation 2011 (SA), regulation 36A
- [Standards for Registration and Review of Registration of Schools in South Australia](#)

References

- 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](#)



Review

Development/Review Team:	LESNW/ CompliSpace	
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