



# **Complaints Handling Policy**

## COMPLAINTS HANDLING POLICY

This policy sets out the requirements with respect to management of complaints, as well as the various supports available to AllU staff when responding to concerns and complaints, and can be easily accessed on the AllU website [here](#), and is included in all student, host family and AllU staff orientation/induction starter packs.

**The Complaints Handling Policy is intended for all people who might need to access a complaint process, including students, host families, host schools, affiliated third-party organisations and AllU staff.**

**The Complaints Handling Policy does not prevent students, host families, host schools, affiliated third-party organisations and AllU staff from exercising their rights to other legal remedies.**

NB: Schools enrolling student exchange students are required to maintain an overseas student's enrolment (to comply with student visa conditions) and appropriate student welfare support arrangements until the relevant complaints or appeals process is resolved.

### Context

This Complaint Handling Policy which outlines the policy and procedures relating to the management of complaints. The policy:

- ensures procedural fairness (in accordance with good practice and the minimum standards for IQU accreditation)
- includes information on how to refer a complaint to the appropriate person/body if the complainant is not satisfied that their complaint has been resolved or addressed
- is accessible to all parties involved in the Student Exchange Program (in accordance with good practice and the minimum standards for IQU accreditation).

### Scope

The scope of the Complaints Handling Policy covers all matters of complaint as they relate to the implementation of AllU's policies, guidelines, programs and processes, including complaints about child abuse and child harm, breaches of relevant policies or the Code of Conduct and obligations to act and report.

### AllU's role

AllU may receive and need to manage complaints on a range of matters. Complaints are best addressed in an environment where all the relevant parties feel able to raise any relevant issues, particularly those concerning the welfare and safety of students.

There is a requirement that all concerns are treated seriously and that opportunities raised through complaints to change or improve policies, practices and learning opportunities for students, are considered by AllU.

AIU will foster an approach to complaints which:

- recognises that emotional, physical or sexual abuse and other negative life experiences such as racism or violence constitute a trauma
- understands that the impact of abuse on children can be profound, especially when it occurs at developmentally vulnerable times of their life
- uses strategies to help children participate in complaints processes without causing further trauma
- have a built-in process for the exchange student to lodge a formal complaint or appeal if a matter cannot be resolved informally
- will commence assessment of the complaint or appeal within 10 working days and finalise the outcome as soon as practicable
- ensures that the exchange student is given an opportunity to formally present their case in writing at minimal or no cost
- ensures that AIU conducts the assessment of the complaint or appeal in accordance with the requirements of procedural fairness
- ensures that the exchange student is given a written statement of the outcome of the internal appeal, including detailed reasons for the outcome
- keeps a written record of the complaint or appeal, including a statement of the outcome and reasons for the outcome
- explains the internal review process to the student and their parent or guardian
- informs the exchange student they can contact the IQU if they or their parent or guardian is concerned about the conduct of AIU
- gives a complainant the IQU's contact details.

## **AIU Leadership role**

Ultimately the General Manager and Assistant General Manager, together with the relevant Regional Manager/s, are responsible for the efficient and effective organisation, management and administration of AIU's complaint-handling processes.

The AIU leadership team will:

- actively communicate that complaints are welcome from anyone in AIU's community, are taken seriously and are a valuable source of information which can help improve the organisation
- always consider AIU's duty of care to the student/s involved in the complaint
- ensure all relevant AIU personnel are advised about the complaint
- develop and publish a complaints policy which explains the processes for raising concerns or complaints including:
  - who to contact to raise a concern or complaint
  - actions upon receipt of a complaint
  - timeframes for acknowledgement and resolution of a complaint
  - potential outcomes
  - escalation process if mutually agreed resolution is not reached, including access to an appeals process
- facilitate training all AIU staff, local coordinators, host families and students on complaint- handling procedures.

## AllU Staff member role

The relevant state-based Regional Manager/s have ultimate responsibility for working with the complainant to achieve a mutually agreed resolution when a complaint is raised, by:

- communicate with the complainant to ensure they are aware of the complaint policy, and to better understand the issues or problem.
- offer support to the complainant who reports and where it is the case, the accused staff member, volunteer or other party
- initiate internal processes to ensure the safety of all children including an alleged victim, clarify the nature of the complaint and commence disciplinary process and investigation (if required)
- decide, in accordance with legal requirements and duty of care, whether the matter should/must be reported to police, DCSSDS and/or the QFCC and make a report as soon as possible if required.
- if the complainant has not raised the issue with a relevant AllU staff member, ask the complainant to initiate discussions with the relevant AllU staff member in the first instance, if appropriate in the circumstances \*
- keep written records of complaints that require resolution actions and document all steps taken to achieve agreement
- arrange an initial meeting with the complainant and/or all other relevant parties to the complaint
- at the conclusion of the process, discuss any findings with the complainant in an attempt to reach an agreed resolution
- inform the complainant, in writing, of the outcome, and offer an opportunity for the complainant to appeal the decision according to AllU's Appeals Policy, which can be easily found on the AllU website [here](#)
- communicate to the complainant steps AllU have taken or intend to take to prevent a similar incident or issue from occurring again.

The relevant AllU staff member will:

- provide a prompt response, in writing, with indicative timelines relevant to the nature of the complaint
- speak with the complainant to ensure they understand the problem and provide any additional support to help resolve the complaint
- acknowledge the goal is to endeavour to achieve an outcome that supports the best interests and wellbeing of the complainant
- advise the complainant how the complaint will be addressed
- provide updates throughout the process as agreed with the complainant
- seek advice from appropriate personnel within the AllU, and beyond
- consider the wellbeing of all relevant parties to the complaint
- consult, in situations where further time is required, with the complainant and discuss any interim solutions.

## AllU Local Coordinator role

AllU Local Coordinators, may in some circumstances be seen by the complainant as the frontline personnel to channel a complaint to the relevant AllU staff:

The local coordinator will:

- work alongside the complainant, where the complainant is a student, host family and/or host school, to ensure that the complaint is clearly communicated to AllU
- assist the complainant complete and submit the AllU Complaint Form
- be slow to give advice but quick to listen, able to keep the confidence of the student, host family and/or host school and offer responsible and reliable advice
- speak with the student, host family and/or host school frequently throughout the process to hear their concerns, and liaise with the relevant AllU staff member to anticipate and resolve any process issues before they impact on the complaints handling procedure
- provide an understanding of any **cultural and/or consideration of diversity** of the student and/or host family regarding the impact of any social norms, beliefs or attitudes on the complaint or the complaints handling process
- offer any relevant information impacting on the complaint which has been documented by the local coordinator through their monthly programs reports, enabling a speedy resolution and to facilitate a flow of information to all parties concerned.

## Complainant's support person

A complainant can have a support person to assist at any time in the complaint process, including as an **alternative person** to report their concerns if necessary. This person **is not** the AllU's designated Local coordinator.

A support person's role may include:

- raising the complaint or safety concern on behalf of the complainant
- discussing difficulties the complainant is experiencing in relation to the complaint
- helping to develop a good working relationship between the complainant and any other relevant parties
- assisting the complainant to understand official policy and guidelines and the resolution being proposed for the complaint.

**A support person can be a family member, a friend, a community member or a person provided through a support or advocacy agency.**

AllU must be advised that the complainant wishes to nominate a support person, advocate or another representative when making a complaint, and provide the name, contact details and relationship to the complainant of the nominated person.

Failure to notify of the inclusion of third parties can result in the delay and rescheduling of the complaint.

## Interpreting services

Where applicable, AllU should engage the local Translating and Interpreting Service as required.

## Types of complaints

The complaints handling policy pertains to the different types of complaints or concerning behaviour that can be reported, including mandatory reporting obligations, through the Reportable Conduct Scheme, which can be easily accessed on the AllU website [here](#).

A complaint can include:

- expressions of dissatisfaction about AllU's services or dealings with individuals
- allegations of abuse or misconduct by an AllU staff member, a volunteer or another individual associated with the program
- disclosures of abuse or harm made by a child or young person i.e. a student
- the conduct of a student during the program
- the inadequate handling of a prior concern
- general concerns about the safety of a group of children or activity
- breaches or inadequacies of AllU policies and/or procedures
- breaches of the AllU's Code of Conduct
- breaches of AllU's record keeping obligations and privacy obligations.

## Complaint management conduct

When addressing a complaint, all parties are expected to:

- be considerate of each other's views and respect each other's role
- be resolution focused
- act in good faith and cooperation
- behave with respect and courtesy
- respect the privacy and confidentiality of those involved, as appropriate
- operate within and seek reasonable resolutions that comply with any applicable legislation and AllU policy.

If the complainant is a child or young person i.e. a student, the recommended actions to take, especially if the complaint raises a safety concern, or discloses abuse, include:

- let the child talk about their concerns in their own time and in their own words. Give them full attention, time and a quiet space in which to do this
- maintain a calm appearance and do not be afraid of saying the 'wrong' thing
- be supportive, reassuring and comforting if they are upset
- tell them it is not their fault and that they were right to tell you
- ask open-ended questions and not leading questions
- do not make promises you cannot keep
- let them know you will act on this information, that you may need to let other people know, and explain why that is the case
- write down what the child told you as soon as you can, using their words as best as you can remember. Take note of their behaviour and appearance at the time
- take notes of physical evidence, for example, bruising if the child shows you
- help the child and/or their family to get appropriate support, such as counselling
- thank or commend the child for helping make your organisation safer.

There are a number of supports available to manage difficult, vexatious or malicious complaints. In these circumstances, AllU should engage with independent third-party mediation and conflict resolution services, as appropriate.

## **Record keeping, reporting and privacy requirements**

AllU will ensure that proper recording and documenting of all complaints and related outcomes is maintained, according to AllU's Record Keeping and Procedural Guidelines and Privacy Policy, both which can easily be accessed on the AllU website [here](#).

Full and accurate records are created about all complaints or safety concerns that are raised, and kept even if an investigation does not uphold a complaint. Documents and other types of records will be kept so there is a full account of how the complaint or safety issue arose, what response was taken and what happened.

This includes:

- all letters or emails raising, or about, a complaint or safety concern
- notes of meetings or conversations where complaints or safety concerns are raised or discussed
- incident reports, witness statements, transcripts or notes of interviews with witnesses, or submissions
- investigation reports as well as briefings, notes, letters or other records created as part of an investigation
- referrals to authorities, copies of information shared with authorities and records of any interactions with authorities
- reports received from medical practitioners, health professionals, psychologists, teachers, coaches, social workers, legal officers, counsellors, chaplains and case officers in relation to a complaint or safety concern
- records about support provided to any parties and any other action taken in response to the complaint or safety concern (such as compensation, redress, counselling, apologies and acknowledgements, insurance claims and assessments)
- records of proceedings or decisions by bodies, tribunals or courts.
- relevant records which may help with the investigation of a complaint or safety concern e.g. rosters, sign on sheets, personnel records of staff and volunteers (including relevant security checks and Working with Children Check/QLD Blue Card)
- student enrolment, attendance and absence records
- permission forms from parents and carers
- surveillance images and footage
- program flyers, location maps, photographs
- any other supporting documentation relevant to the complaint.

All records are dated and clearly list the details of participants and witnesses and maintained with context in an 'indexed, logical and secure manner', so they cannot be interfered with or destroyed.

Records are also kept of the outcome of any investigations, or the resolution of the complaint, including any findings made, reasons for decisions and actions taken e.g. this may include whether the complaint led to a review of AllU's risk management plan or Child Safety and Wellbeing Policy and practices. AllU's leadership team has oversight of complaints raised, allowing reviews of how complaints were handled to provide quality assurance and enable continuous improvement.

NB: In Queensland there is no time limit on when a person can bring a civil action based on a child abuse claim.

It can be a criminal offence to destroy evidence required for a legal proceeding. The Royal Commission recommended that records relating to child sexual abuse be kept for 45 years.

When responding to complaints and safety concerns AllU is aware of its confidentiality, privacy and employment law obligations, noting the following:

- Whilst confidentiality is important for complaints processes, especially where people wish to remain anonymous, or may not want information shared with authorities such as police, whether information needs to be kept confidential will depend on the circumstances and the nature of the complaint, in order to best protect children or so that the subject of a complaint can be treated fairly.
- Personal information that identifies a child or another individual associated with a complaint will only be disclosed by AllU as permitted under the relevant laws. However, an individual's right to privacy is not absolute. Sometimes other concerns are given priority, such as the safety of others, or the interests of justice.
- AllU's complaint handling policy and processes are required to be in line with any employment law obligations that apply to AllU staff and volunteers, ensuring that any investigation into an employee's conduct complies with procedural fairness.

## Outcomes of raising a complaint with AllU

Outcomes are any actions consistent with AllU, policies and relevant government legislation that are intended to support the complainant.

Complainants must be provided with an explanation as to the steps taken to resolve the matters raised.

When all reasonable avenues have been exhausted and a mutually agreed resolution cannot be reached, the complainant may contact independent third-party mediation or a conflict resolution service to assist with resolution.

AllU can also engage a mediator or other conflict resolution service where appropriate.

NB: If a mutually agreed resolution cannot be reached, the complaint can be escalated to the General Manager, AllU for resolution.

## Raising a complaint with the International Quality (Schools) Unit (IQU)

The complainant has the right to contact the International Quality (Schools) Unit (IQS) at **any time** regarding a complaint.

The Regional Manager, AllU will inform the exchange student that they can contact the International Quality (Schools) Unit (IQS) if the exchange student or parent/guardian is concerned about AllU's conduct. This will be reiterated by the Local Coordinator.



The IQS, under part 6, division 1 of the Education (Overseas Students) Act 2018 [Qld] may suspend or cancel AllU's registration as a secondary student exchange organisation; and that the complaints handling and appeals process described in AllU's policies and procedures does not prevent an exchange student from exercising the student's rights to other legal remedies.

The International Quality (Schools) Unit (IQS) can be contacted as follows:

Street address: Education House, 30 Mary Street, BRISBANE QLD 4000

Postal address: PO Box 15033 City East QLD 4002

Phone: +61 (07) 3513 6748

Email: [InternationalRegistration@qed.qld.gov.au](mailto:InternationalRegistration@qed.qld.gov.au)

The IQU, in turn, will investigate the complaint, specifically in relation to AllU's compliance with the Student Exchange Organisation Standards and Child Safe Standards (CSS).

## Policy Review

This policy will be **reviewed every year** and following significant incidents if they occur.

Complaints, concerns and safety incidents are regularly analysed to identify causes and systemic failures to inform continuous improvement, and feed into an annual review (or a review following a significant incident or legislation changes) of the *Complaints Handling Policy*, *Appeals Policy*, *Recordkeeping Procedural Guidelines*, *Privacy Policy* and the *Empowerment and Participation Guidelines*. This analysis and review contribute to overall organisational effectiveness ensures AllU's compliance with all accredited student exchange organisation and child safety and wellbeing related laws, regulations and standards.

The General Manager, AllU has overall responsibility to ensure that these reviews form part of core business for the organisation and to delegate the facilitation of these reviews to the Regional Managers. Once a policy or procedure has been reviewed, and if needed, updated, the General Manager is the designated 'Approver'.

Changes to policies and procedures are made based on review findings to better protect the children and young people we engage with.

As part of AllU's commitment to a culture of continuous improvement, child safe practices, including the policies and procedures aforementioned is a standing item on the agenda of all scheduled leadership and staff meetings.

Where possible, AllU does its best to seek feedback from all stakeholders throughout this process, including students, host families, host schools, parents/carers, third-party affiliated organisations, and where appropriate local Aboriginal communities, culturally and linguistically diverse communities and people with a disability.

AllU collects data regarding the quality of its programs and the effectiveness of its policies and procedures, as well as the frequency and types of safety and wellbeing issues that are experienced by our students, so that we can measure the success or otherwise of our strategies and identify emerging trends or needs.

Sources of data that are assessed on an annual basis include but are not limited to:

- AllU staff, volunteers, students, parents/carers, host families, host schools and third-party partners survey/feedback data
- Participation data
- Incidents data
- Qualitative reports
- Anecdotal commentary through business-as-usual interactions.

AllU utilises a formal *Evaluation Framework: Policies, Guidelines and Programs* to record, review and analyse complaints, issues, concerns and safety incidents, and in accordance with the processes outlined in its *Engagement Overview*, reports on and shares findings and actions taken with students, parents/carers, staff, host families, host schools, volunteers and third-party partner organisations, including those related to child safety incidents.

POLICY APPROVER  
General Manager, AIIU

Approved: 1 July 2025

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REVIEW

This policy is to be reviewed by 30 June 2026

## Appendix 1: Flowchart: complaint reporting process

This chart outlines a process for reporting a complaint to an AllU.

Who can report?	<ul style="list-style-type: none"> <li>• Child/Student/Peer</li> <li>• Parent/Carer</li> <li>• Host Family</li> <li>• AllU Local coordinator</li> <li>• AllU Staff member</li> <li>• Host School</li> <li>• Third-Party Affiliated Organisations</li> <li>• Others in the community</li> </ul>
What to report?	<p><b>Call 000 if a child is in immediate danger</b></p> <p>Any concerns or complaints, including:</p> <ul style="list-style-type: none"> <li>• expressions of dissatisfaction about AllU's services or dealings with individuals</li> <li>• allegations of abuse or misconduct by an AllU staff member, a volunteer or another individual associated with the program</li> <li>• disclosures of abuse or harm made by a child or young person i.e. a student</li> <li>• the conduct of a student during the program</li> <li>• the inadequate handling of a prior concern</li> <li>• general concerns about the safety of a group of children or activity</li> <li>• breaches or inadequacies of AllU policies and/or procedures</li> <li>• breaches of the AllU's Code of Conduct</li> <li>• breaches of AllU's record keeping obligations and privacy obligations.</li> </ul>
How to report?	<p><b>A choice of ...</b></p> <p>Face-to-face verbal report, letter, email, telephone call, meeting.</p> <p>The complainant must eventually complete the AllU Complaints Form.</p>
Who to report to?	<p>The relevant state-based Regional Manager/s, who will acknowledge receipt of a complaint, in writing, within two days.</p> <p>If a complaint needs to be made about the relevant state-based Regional Manager/s, then it is reported to the General Manager, AllU.</p>

<p>What happens next?</p>	<p>The relevant state-based Regional Manager/s will:</p> <ul style="list-style-type: none"> <li>• communicate with the complainant to ensure they are aware of the complaint policy, and to better understand the issues or problem.</li> <li>• offer support to the complainant who reports and where it is the case, the accused staff member, volunteer or other party</li> <li>• initiate internal processes to ensure the safety of all children including an alleged victim, clarify the nature of the complaint and commence disciplinary process and investigation (if required)</li> <li>• decide, in accordance with legal requirements and duty of care, whether the matter should/must be reported to police, DCSSDS and/or the QFCC and make a report as soon as possible if required.</li> <li>• Ask the complainant to initiate discussions with the relevant AllU staff member in the first instance, if appropriate in the circumstances *</li> <li>• keep written records of complaints that require resolution actions and document all steps taken to achieve agreement</li> <li>• arrange an initial meeting with the complainant and/or all other relevant parties to the complaint</li> <li>• at the conclusion of the process, discuss any findings with the complainant in an attempt to reach an agreed resolution</li> <li>• inform the complainant, in writing, of the outcome, and offer an opportunity for the complainant to appeal the decision according to AllU's Appeals Policy, which can be easily found on the AllU website <a href="#">here</a></li> <li>• communicate to the complainant steps AllU have taken or intend to take to prevent a similar incident or issue from occurring again.</li> </ul> <p><b>* The AllU staff member assigned to the complaint will:</b></p> <ul style="list-style-type: none"> <li>• provide a prompt response, in writing, with indicative timelines relevant to the nature of the complaint</li> <li>• speak with the complainant to ensure they understand the problem and provide any additional support to help resolve the complaint</li> <li>• acknowledge the goal is to endeavour to achieve an outcome that supports the best interests and wellbeing of the complainant</li> <li>• advise the complainant how the complaint will be addressed</li> <li>• provide updates throughout the process as agreed with the complainant</li> <li>• seek advice from appropriate personnel within the AllU, and beyond</li> <li>• consider the wellbeing of all relevant parties to the complaint</li> <li>• consult, in situations where further time is required, with the complainant and discuss any interim solutions.</li> </ul>
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Outcome	<ul style="list-style-type: none"> <li>• Investigation completed (AllU commits to an assessment of the complaint taking place within 10 working days and that the outcome be finalised as soon as practicable).</li> <li>• Outcome decided (Regional Manager inform the complainant, in writing, of the outcome).</li> <li>• Relevant child/student/peer, parents/carers, AllU staff, AllU local coordinators, host families, host schools and/or third-party affiliated, as well as any other parties are notified of outcome of investigation.</li> <li>• Disciplinary action taken and/or policies, procedures reviewed and updated where necessary.</li> </ul>
Appeals	<ul style="list-style-type: none"> <li>• The Regional Manager will offer an opportunity for the complainant to appeal the decision according to AllU's Appeals Policy, which can be found on the AllU website <a href="#">here</a></li> <li>• A person who wishes to appeal a decision must lodge a notice of appeal directly with the General Manager, AllU within 20 business days of the original decision.</li> <li>• Assessment of a notice of appeal lodged will commence within 10 Business days of lodgment and be finalised as soon as reasonably practicable.</li> </ul>