

CHILD SAFE COMPLAINTS MANAGEMENT POLICY AND PROCEDURES

Living Hope Church values and respects every child and young person and takes every concern and allegation seriously. At Living Hope Church we foster a child-rights-focused complaints culture among staff and volunteers at each level and ensure we do what is in the best interests of the child or young person—by valuing and listening to children and young people and respecting their rights.

Purpose

The purpose of this policy is to empower everyone at Living Hope Church to be confident that complaints made reporting inappropriate behaviour around kids will be received, recorded, managed, resolved and reported to the relevant authorities to take appropriate action.

Everyone at Living Hope Church should report any concerns about the safety or welfare of a child or young person immediately.

Policy

Living Hope Church is committed to investigating and fairly assessing every formal complaint and to take appropriate action where needed.

All individuals including children and young persons have the right to raise concerns, questions and complaints relating to such matters as behaviour, practices and decisions and to expect that each issue is handled with sensitivity and in a fair and balanced way. No child or young person should be victimised because they raise a complaint or are associated with a grievance.

What is a complaint?

The term 'complaint' should be interpreted broadly. It can include expressions of dissatisfaction about an organisation related to one or more of the following:

- its services or dealings with individuals
- allegations about the conduct of its staff, volunteers or other individuals engaged by the organisation
- another child or young person at the organisation, or the handling of a prior concern.

Child Safe Complaints Procedure

1. Receiving the complaint

Complaints may be received in various ways, including in person, by phone, via an online complaint form, by email or by social media. Matters involving allegations of, or suspected abuse, should be directly referred to the Church Safety Officer (CSO - refer to Schedule 1 for contact details). This notification should occur as soon as practicable.

If the disclosure comes from a child or young person, we will ensure to listen calmly, patiently and supportively as well as reassuring them that they are doing the right thing by speaking up and that we believe them. We will address any concerns about their safety and tell them that what happened is not their fault.

The child or young person will be asked what they need from the person receiving the complaint or Living Hope Church so they can feel safe and involved in the process. Finally, we will manage the child or young person's expectations by being clear that we may need to tell other people certain things about their experience to be able to keep them and other children and young people safe, but otherwise we will keep what they have told you private.

2. Recording the complaint and relevant information

Living Hope Church will record the key complaint details, such as details about the complainant, any additional communication or support required; details about the subject of the complaint, the complaint issues, how the complaint was resolved/investigated; risks managed and the complaint outcome.

Refer to:

Appendix 1 *Child safety reporting process flowchart on page 6* and

Appendix 2 *Complaint Handling overview process on page 7*

3. Acknowledging the complaint

Complaints will be acknowledged at the time of receipt or as soon as possible afterwards. Children and young people are often wary about making a complaint and want to be assured they are being listened to straight away. We will acknowledge the complaint by using the preferred communication method nominated, identify a contact point for the child or young person and their parent or carer as well as provide the child or young person with information about the complaint-handling process, next steps and expected timeframe.

4. Assessing the complaint and addressing immediate risks

The initial assessment of a complaint will involve the following questions being asked:

- a) Does the complaint raise any immediate risks to the safety or wellbeing of a child or young person or other person?
- b) What other issues does the complaint raise?
- c) What steps need to be taken to address and manage risks throughout the complaints process?

- d) Does the child or young person affected by the complaint (or other children involved or impacted) require any additional supports during the complaints process?
- e) What evidence needs to be immediately secured/protected/kept confidential?
- f) How serious, complicated or otherwise urgent are the issues raised in the complaint (from both the perspective of the complainant, involved child or young person and the organisation)?
- g) Are the issue/s raised within your organisation's control?
- h) Are the outcomes sought by the complainant viable? If more than one issue is raised, will they need to be separately addressed?
- i) What other authorities or agencies (e.g., police, health services) need to know about the issues raised by the complaint or be involved in the response?
- j) What type of information should the complainant be provided following your assessment?
- k) Is further information needed from the complainant in order to properly assess and resolve the complaint?

If the complaint is not about something Living Hope Church can respond to, we will ensure that the complainant is told this and (wherever possible) referred to a person or organisation that can help as quickly as possible.

Any complaint which involves an allegation of criminal conduct or creates a suspicion of criminal conduct, should be reported to the police.

5. Planning the involvement of the child or young person

Once the issues raised by the complaint have been assessed, Living Hope Church will develop a plan for involving the affected child or young person and their parent or carer at key stages of the complaint, including when and how information will be communicated to them throughout the process and how they will be supported.

A rationale for all decisions in this area will be recorded. It is critical that rapport is established with the child or young person early on by those involved in the complaints process. For example, with the contact person and the person undertaking an interview with the child or young person. It should also cover how the child's parents or carer will be involved in the process.

6. Resolving complaints

After assessing the complaint, Living Hope Church will plan the actions required to manage and resolve it. Wherever possible, we should try to resolve complaints promptly with a complainant and—particularly where the matter is minor—as soon as possible after the complaint is made. However, where the complaint relates to a serious allegation or incident, this may not be appropriate. It is critical that we keep the complainant adequately informed about what is happening with their complaint and clarify timeframes where there are delays.

Staff will be required to keep records of any reasons for delays in responding to complaints, and any communication with the person making the complaint.

More serious complaints will require an evidence-based rather than an outcome-focused approach.

7. Conducting an investigation

The following steps will be undertaken as part of an investigation:

- a) Living Hope Church will action the relevant issues identified through the assessment process, starting with any immediate safety risks posed to a child, young person or class of children, and undertaking any risk management associated with the subject of complaint.
- b) Living Hope Church shall select the appropriate investigative approach by looking at any statutory requirements, consulting relevant external bodies (e.g. police and child protection agencies) and considering the nature of the issue or allegations raised and the likely outcome of the investigation.
- c) We will develop an investigation plan, ensuring that, where appropriate, relevant authorities are consulted and involved in its design and implementation to ensure an organisation's actions do not compromise a police or child protection investigation.
- d) We will obtain and protect evidence, including identifying relevant witnesses and putting the allegations to the subject of complaint at the appropriate point in time—affording them fairness.
- e) We will analyse, assess and weight all of the evidence gathered.
- f) We will make findings about the allegations and explain them to the subject of complaint and the complainant.

8. Providing regular updates throughout the complaints process

Living Hope Church will let the complainant and—depending on the complainant's needs, also their family, guardian and/or support person—know what is happening with their complaint, when they can expect to hear from you and who to contact for more information or if they have questions about the process.

The frequency of updates and the nature and quantity of information provided to the complainant should be determined in accordance with their specific needs and wishes, and privacy and confidentiality obligations.

9. Providing the final outcome

Living Hope Church will report final findings to the complainant, the subject of complaint and other stakeholders, considering privacy, confidentiality and procedural fairness obligations. We will explain to the complainant and the subject of complaint—using the most appropriate communication channel and putting in place any necessary supports—the key steps taken to investigate the complaint, the outcome (including the reasons for your decision), and available avenues for review and/or appeal if they are dissatisfied with the outcome and/or the complaints process.

10. Closing the complaint and record the outcome

Living Hope Church will close the complaint and keep comprehensive records about:

- how the complaint was managed
- the outcome
- any recommendations and/or outstanding actions and how they have been addressed.

Living Hope Church will make a record of any systemic issues identified and invite people to provide feedback at the conclusion of the complaints process.

11. Facilitating ongoing support for those involved in the complaint

As part of our process for finalising complaints, we will consider whether the person who made the complaint or a child or young person involved in the complaint (or their parents/carers) is likely to need or want ongoing support. This might include support you can provide within your organisation, as well as referrals that you can facilitate to other organisations where required (for example, referrals for counselling).

12. Continuous improvement

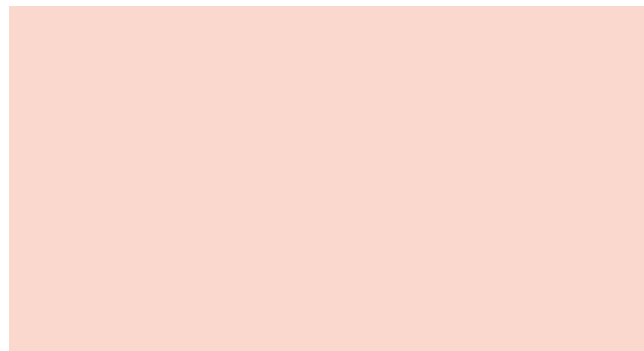
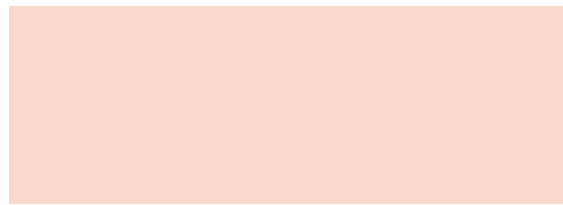
In addition to making adjustments to any systems or practice weaknesses identified by a specific complaint or general feedback, Living Hope Church will have a system for collecting, maintaining and reviewing complaints data to identify any broader trends with the aim of improving service delivery/performance. We will look for opportunities to communicate with people who have made complaints, and with stakeholders broadly, about any changes or improvements brought about through the handling of complaints, or review of complaint data.

This will help people to see the tangible benefits from making complaints and may help people to feel more comfortable about raising other concerns in the future.

| Organisation / Office | Phone Number |
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| Australian Charities and Non-for-Profits Commission | 13 ACNC (13 22 62) |
| C3 Australia | 1300 232 878 |
| Child Protection Helpline | 13 21 11 |
| Kids Helpline | 1800 551 800 |
| National Redress Scheme (People who have experienced child sexual abuse) | 1800 737 377 |
| National <i>Sexual Assault</i> , Family & Domestic Violence Counselling Line | <u>1800 RESPECT /</u> <u>1800 737 732</u> |
| Office of Fair Trading | 13 32 20 |
| Safer Church National Helpline | 1800 070 511 |

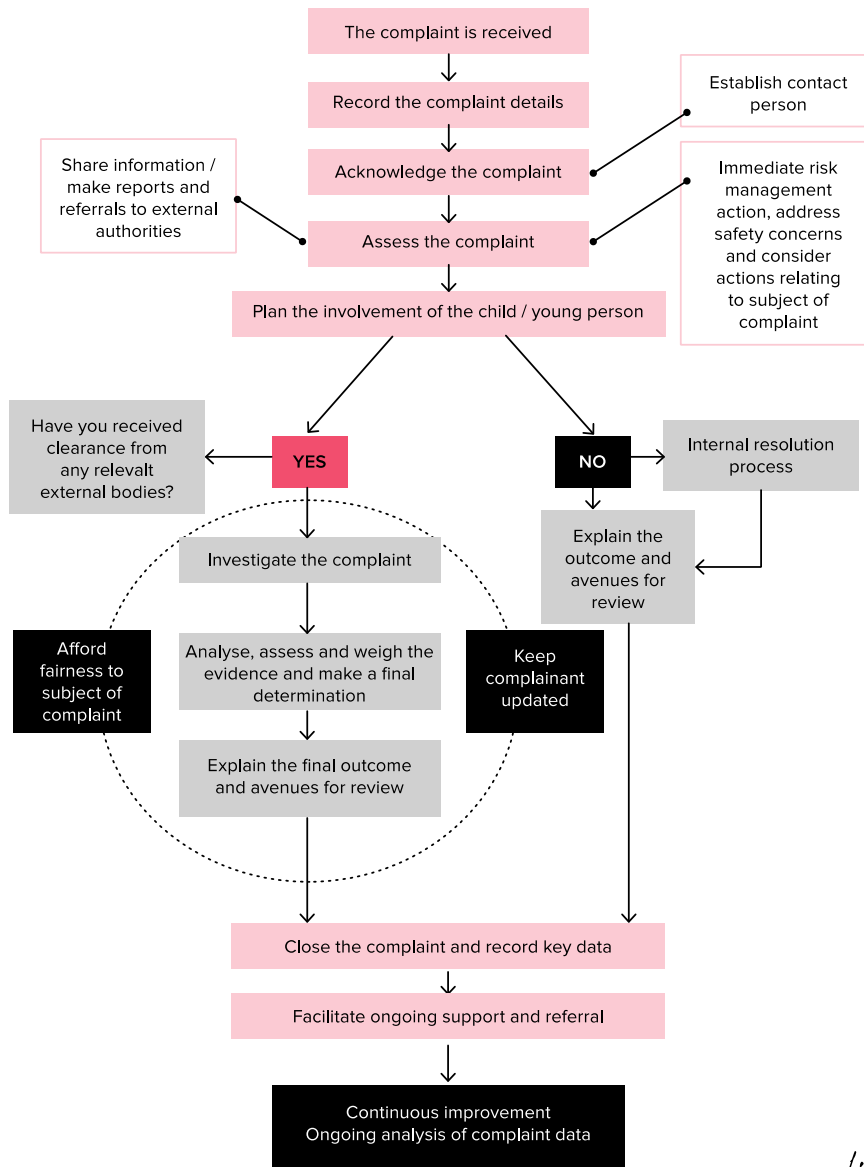
APPENDIX 1 – Child safety reporting process flowchart
REMEMBER! Always call 000 if a child is in immediate danger

Child Safety Reporting Process



APPENDIX 2 - Complaint Handling overview process

Complaint handling overview process



Legislation

- Children and Young Persons (Care and Protection) Act 1998 (NSW)
- Children’s Guardian Act 2019
- Child Protection (Working with Children) Act 2012
- Crimes Act 1900 (NSW)
- Family Law Act 1975 (Cth)

Other Related Documents

- <https://childsafety.pmc.gov.au/resources/complaint-handling-guide-upholding-rights-children-and-young-people>
- Children and Young Person Safety Policy
- Code of Conduct
- Complaints Policy
- Known Sex Offender or Person of Concern Attending Church Services
- Privacy and Confidentiality policy
- Whistle-blower Policy
- WHS Policy

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