

# **Complaints Management in Anglican Schools**

## **Procedures**

V2.0 (effective 28/01/2019)

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## 1. Introduction

These Procedures support the *Complaints Management in Anglican Schools Policy* (the Policy) and provide direction to relevant persons regarding their role and responsibilities when actioning the Policy.

Any individual can make a complaint, including students, staff, visitors, parents, guardians or other members of the community.

Throughout the Procedures, unless otherwise indicated, the term School staff includes the Principal/ Head of School and all other employees.

Information on definitions and key terms can be found in Appendix 1.

## 2. Four stage complaints management process

Unless additional action is described in Section 3, all complaints in relation to an action, behaviour, omission or decision by a School staff member, or volunteer will be managed in accordance with the following four stage complaints management process.

Refer to section 3.2 for information about complaints in relation to visitors to the School.

### Stage 1 - Discuss the matter with the relevant staff member or volunteer

Wherever possible, the complainant is encouraged, in the first instance, to discuss their complaint with the staff member or volunteer whose action, behaviour, omission or decision is in question. When resolving complaints at this stage:

1. the complainant is asked to speak with the staff member or volunteer and request a time to discuss their concern regarding the staff member or volunteer's action, behaviour, omission or decision;
2. the complainant and the staff member or volunteer may speak with the Principal, or another member of the School's leadership team, about obtaining support during the complaints management process, as outlined herein;
3. the staff member or volunteer must speak with the Principal, or another member of the School's leadership team, should any of the specific case management requirements apply, as per Section 3 of the Procedures;
4. if the Principal, or another member of the School's leadership team, is not involved in the discussion, the staff member or volunteer is to:
  - a) inform the complainant about these Procedures and the Complaints Management Policy, and
  - b) offer to inform the Principal, or another member of the School's leadership team, of the complaint raised, and the outcome of the discussion;
5. if the Principal, or another member of the School's leadership team is made aware of the complaint, they will:
  - a) ensure the complaint is documented; including the names of all parties involved, the nature of the concerns, the date and time of any discussion, the agreed outcomes and any required actions;
  - b) consider if any other policies, procedures or protocols are to be applied, particularly those referenced in the Complaints Management Policy regarding student protection and the conduct of staff and volunteers;
  - c) consider if it is appropriate to ensure the document outlining the management of the complaint is filed in the staff member or volunteer's personnel file and any agreed actions are completed;
  - d) consider whether the staff member or volunteer requires any additional training or support in relation to their role, or whether any other action is required; and
  - e) identify any issues or strategies to be incorporated in the School's quality improvement planning.

When the complainant determines that it is not appropriate to discuss the complaint with the staff member or volunteer, or in doing so they do not believe their complaint has been addressed to their satisfaction, they are asked to proceed to Stage 2 of the complaints management process.

## Stage 2 – Make a complaint to the Principal or another member of the School’s leadership team

When escalating a complaint to this stage, the complainant may raise their complaint with the Principal, or another member of the School’s leadership team, either in writing or verbally. When resolving a complaint at this stage:

1. the complainant is asked to inform the Principal, or leadership team member, of their complaint: including the names of all parties involved, the nature of the concerns, any specific dates and times when incidents occurred, the complainant’s feedback about their discussion with the staff member or volunteer, and the reason why the complaint remains unresolved;
2. the Principal or leadership team member will:
  - a) consider if any of the specific complaints management requirements (as per Section 3 of the Procedures); or other policies, procedures or protocols (particularly those referenced in the Complaints Management Policy regarding student protection and the conduct of staff and volunteers); are to be applied;
  - b) speak with the staff member or volunteer and obtain further information about their actions in relation to the complaint;
  - c) advise all parties involved about support available to them during the complaints management process, as outlined herein;
  - d) organise meeting/s with the complainant, or their advocate, and the staff member or volunteer, as soon as practicable; to gather further information about the ongoing complaint and develop a plan to satisfactorily resolve the complaint;
  - e) explain to the complainant, or their advocate, and the staff member or volunteer that they may have a support person present during any meeting;
  - f) ensure meetings are documented, including the agreed outcomes and required actions;
  - g) consider whether the staff member or volunteer requires additional training or support in relation to their role, or whether any other action is required;
  - h) ensure the agreed outcomes and required actions are communicated to the complainant;
  - i) ensure the records related to the complaint, e.g. meetings, reports, letters etc. are filed on the staff member or volunteer’s personnel file and any agreed actions are completed; and
  - j) incorporate relevant learnings into the School’s quality improvement planning.

When the complainant determines that it is not appropriate to discuss the complaint with another member of the School’s leadership team, or in doing so they do not believe their complaint has been addressed to their satisfaction, they are asked to contact the Principal.

When the complainant, or their advocate, determines that it is not appropriate to discuss the complaint with the Principal, or in doing so they do not believe their complaint has been addressed to their satisfaction, they are asked to proceed to Stage 3 of the complaints management process.

## Stage 3 – Escalate the complaint to the Chair

When escalating a complaint to this stage, the complainant may raise their complaint with the Chair of the School’s council, either in writing or verbally. When resolving a complaint at this stage:

1. the complainant is asked to inform the Chair of their ongoing complaint, including their feedback on previous meetings with the School and the reason why the complaint remains unresolved;
2. the Chair will:
  - a) consider if any of the specific complaints management requirements (as per Section 3 of the Procedures); or other policies, procedures or protocols (particularly those referenced in the Complaints Management Policy regarding student protection and the conduct of staff and volunteers); are to be applied;

- b) advise the Principal and staff member or volunteer, that the complaint has now been escalated and obtain further information about the matter and the School's responses to the complaint, including copies of relevant documents or complaints management plans;
- c) advise all parties involved about support available to them during the complaints management process, as outlined herein;
- d) organise meeting/s with the complainant, or their advocate, the Principal and other relevant staff members and volunteers, as soon as practicable; to gather further information about the ongoing complaint and, if required, develop a complaints management plan to resolve the issues;
- e) explain to the complainant and the staff member or volunteer that they may have a support person present during any meeting;
- f) ensure meetings are documented, including the agreed outcomes and required actions;
- g) consider whether the staff member or volunteer requires additional training or support in relation to their role, or whether any other action is required;
- h) ensure the agreed outcomes and required actions are communicated to the complainant;
- i) ensure the records relating to the complaint, e.g. meetings, reports, letters etc. are filed on the staff member or volunteer's personnel file and any agreed actions are completed; and
- j) incorporate relevant learnings into the School's quality improvement planning.

#### **Stage 4 – Escalate the complaint to the Executive Director of the Anglican Schools Commission (Owned or Controlled Schools only)**

When escalating a complaint to this stage, the complainant may raise their complaint with the Executive Director, Anglican Schools Commission, either in writing or verbally. When resolving a complaint at this stage:

1. the complainant is asked to inform the Executive Director of their ongoing complaint, including their feedback on previous meetings with the School and the reason why the complaint remains unresolved;
2. the Executive Director will:
  - a) consider if any of the specific complaints management requirements (as per Section 3 of the Procedures); or other policies, procedures or protocols (particularly those referenced in the Complaints Management Policy regarding student protection and the conduct of staff and volunteers); are to be applied;
  - b) advise the, Chair, Principal and staff member or volunteer that the complaint has now been escalated and obtain further information about the matter and the School's responses to the complaint, including copies of relevant documents or complaints management plans;
  - c) advise all parties involved about support available to them during the complaints management process, as outlined herein;
  - d) organise meeting/s with the complainant, or their advocate, the Chair, Principal and other relevant staff members and volunteers, as soon as practicable; to gather further information about the ongoing complaint and, if required, develop a complaints management plan to resolve the issues. This meeting may occur remotely, e.g. over the telephone;
  - e) explain to the complainant and the staff member or volunteer that they may have a support person present during any meeting;
  - f) ensure meetings are documented, including the agreed outcomes and required actions;
  - g) consider whether the staff member or volunteer requires additional training or support in relation to their role, or whether any other action is required;
  - h) ensure the agreed outcomes and required actions are communicated to the complainant;
  - i) ensure the records relating to the complaint, e.g. meetings, reports, letters etc. are filed on the staff member or volunteer's personnel file and any agreed actions are completed; and
  - j) ensure relevant learnings are incorporated into the School's quality improvement planning.

### 3. Specific complaints management requirements

#### 3.1 Complaints in relation to non-compliance with Student Protection in Anglican Schools Policies and Procedures

The Student Protection in Anglican Schools Policy outlines the commitment to ensure the safety and wellbeing of students attending Anglican Schools and the School's obligation to respond appropriately to all suspected student protection concerns. This includes the School's obligations regarding child protection, concerns of sexual abuse or likely sexual abuse and the management of alleged inappropriate behaviour by a staff member or volunteer. The Student Protection Procedures outline the roles, responsibilities, processes and forms that are used when actioning the Policy and provide information on relevant definitions and key terms.

- a) As per the *Complaints Management Policy*, if the complaint relates to the non-compliance of the *Student Protection in Anglican Schools Policy and Procedures*, and relates to possible sexual abuse or likely sexual abuse of a student in an Anglican School, a complaint is to be made by writing to the Director of Professional Standards (DPS), Anglican Church Southern Queensland. Contact can be made through [gmlles@anglicanchurchsq.org.au](mailto:gmlles@anglicanchurchsq.org.au). Where applicable, the DPS will advise the Executive Director (ED), Anglican Schools Commission.
- b) As per the *Complaints Management Policy*, if the complaint relates to the non-compliance of the *Student Protection in Anglican Schools Policy and Procedures*, and does not relate to possible sexual abuse or likely sexual abuse of a student in an Anglican School:
  - i. for Anglican Schools owned or controlled by the Brisbane Diocese, a complaint is to be made by writing to the Executive Director (ED) of the Anglican Schools Commission, Anglican Church Southern Queensland. Contact can be made through [ASC@anglicanchurchsq.org.au](mailto:ASC@anglicanchurchsq.org.au).
  - ii. for separately incorporated or other Anglican Schools, a complaint is to be made by writing to the Chair of the School's governing body.

When resolving a complaint relevant to section 3.1, the following process will be undertaken:

1. the complainant is asked to inform the DPS or ED of their complaint; including the names of all parties involved, the nature of the complaint, any specific dates and times when incidents occurred, and their feedback on contact with the School;
2. DPS or ED will:
  - a) advise the Principal and/or the Chair that a complaint has been made; and obtain further information about the matter and the School's responses to the complaint, including copies of relevant documents;
  - b) where necessary, ensure that the School takes any action required to comply with the legal and policy requirements detailed in Student Protection in Anglican Schools Policy and Procedures;
  - c) advise all parties involved about support available to them during the complaints management process, as outlined herein;
  - d) organise meeting/s with the complainant, the Principal and/or Chair, and other relevant staff members and volunteers, as soon as practicable; to gather further information about the matter and, if required, develop a plan to resolve the issues. This meeting may occur remotely, e.g. over the telephone;
  - e) explain to the complainant, the Principal and/or Chair, and other relevant staff members and volunteers, that they may have a support person present during any meeting;
  - f) ensure meetings are documented, including the agreed outcomes and required actions;
  - g) consider whether the staff member or volunteer requires additional training or support in relation to their role, or whether any other action is required;
  - h) ensure the agreed outcomes and required actions are communicated to the complainant;
  - i) ensure the record of the complaint, e.g. meetings, reports, letters etc. are filed on the staff member or volunteer's personnel file and any agreed actions are completed; and
  - j) incorporate relevant learnings into the School's quality improvement planning.

### 3.2 Complaints in relation to visitors to the School

When a complaint is about a visitor to the School, the complainant is asked to inform the Principal, or another member of the School's leadership team, of their concerns including, where known, the name of the visitor, the organisation that the visitor works for, the names of any children involved, if relevant, and any dates and times of particular incidents related to their complaint.

The Principal or leadership team member will consider if any other policies, procedures or protocols are to be applied, particularly those referenced in the Complaints Management Policy regarding student protection.

The Principal or leadership team member will document the concerns and, unless the matter involves a criminal investigation, will forward the complaint to the organisation that employs the visitor who has been named in the complaint. If the matter does relate to a criminal investigation, direction will be sought from the Police.

The Principal or leadership team member will also consider the nature of the complaint and determine whether this may impact any future visits to the School by the person named in the complaint.

If the matter is being managed by another member of the leadership team, this member will brief the Principal as soon as practicable.

## 4. Providing support

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Appropriate support should be offered to all parties involved in a complaint management process.

Staff and volunteers may be referred to the Employee Assistance Service or like supports.

Children and parents may be referred to local counselling and support services including the School Counsellor or Chaplain or other supports offered by the School.

## 5. Privacy and confidentiality

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All information disclosed or recorded as part of a complaints management process must be managed in accordance with privacy legislation and principles. Prior to the sharing of information, consent must be obtained from the relevant parties involved in the complaints management process, unless otherwise allowed by law.

## 6. Managing complaints records

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When recording information in relation to a complaints management process, ensure all records are factual and clearly indicate the names of all parties to the complaint, the details of the concerns or complaint, the processes used to resolve the complaint, required actions and responsible officers.

### Storing and accessing complaints records

The Principal, or other member of the School's leadership team, must ensure all information and documents in relation to the complaint are stored on the relevant staff member or volunteer's personnel file.

Prior to giving any individual access to a complaint record, a staff member will consult with the Principal. The Principal will consider any need to consult with the Chair.

## 7. Appeal a complaint process or outcome

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Any person who has made a complaint in accordance with this policy and who is dissatisfied with the complaint management may make an appeal to the Archbishop. The appeal is to be made in writing, clearly stating the grounds on which it is believed the complaint has not been properly dealt with and contain full details of all relevant information regarding the original complaint. If the Archbishop considers it necessary, assistance may be offered to the person to put the complaint in writing.

Contact details for the Archbishop can be found on the [Anglican Church Southern Queensland website](#).

The Archbishop will refuse to consider the appeal until:

- the Anglican Schools Commission (ASC) (for Schools owned or controlled by the Diocese), or
  - the Chair of the School's governing body (for separately incorporated Anglican Schools within the Diocese),
- has had a reasonable opportunity to review the original decision or action through its internal process - unless the complaint is about a decision or action of the Chair of the Anglican Schools Commission or School's governing body;

The Archbishop or delegate may make preliminary inquiries to the Executive Director of the ASC (the Executive Director), or to the Chair of the School's governing body (the Chair), to decide whether a matter should be reviewed without a formal investigation process, or dismissed. If a matter does not lead to a formal investigation, it may be dealt with at a later date if additional information is provided.

## Outcome

If the Archbishop considers that the action to which the matter relates was appropriate in the circumstances, he will advise in writing to both the complainant and the Commission of his reasons.

If the Archbishop considers that the action to which the matter relates -

- a) was taken contrary to law; or
- b) was contrary to any Church Canon; or
- c) was unreasonable, unjust, oppressive, or improperly discriminatory; or
- d) was in accordance with a practice that is or may be unreasonable, unjust, oppressive, or improperly discriminatory in the particular circumstance; or
- e) was taken for an improper purpose; or on irrelevant grounds; or having regard to irrelevant considerations; or was an action for which reasons should have been given, but were not given; or was based wholly or partly on a mistake of law or fact; or was wrong; or was pastorally inadequate;

the Archbishop may recommend:

- a) that the action be referred to the Executive Director and the ASC; or the Chair and the School's governing body, for further consideration; or
- b) that action can be, and should be, taken to rectify, mitigate or alter the effects of, the action; or
- c) that any practice in accordance with which the action was taken should be varied; or
- d) that reasons, or further reasons, should be given for the action; or
- e) that any other steps should be taken.

Without limiting possible recommendations, the Executive Director, or Chair, may be given an opportunity to respond in writing or attend a meeting with the Archbishop and the complainant, or separately, with a view to determining whether resolution of the complaint can be achieved by mediation. The meeting/s may be facilitated by a person who in the opinion of the Archbishop would by training or experience be suitable.

The matter may be resolved through mediation with all parties in the spirit of openness and fairness. A support person may accompany all or any of the parties. Written notes will be signed confirming they represent an accurate summary of the discussion and of any consensus reached.

Should mediation fail to result in resolution, the matter will be referred to the Archbishop, for consideration, who may then call a meeting of the parties either separately or together. The Archbishop may provide for further mediation which may include the Chair of the ASC or make a recommendation as to steps to be taken.

The Archbishop may ask the Executive Director (or Chair) to notify him within a stated time of:

- a) the steps taken, or proposed to be taken, to give effect to the recommendations; or

- b) if no steps, or only some steps, have been or are proposed to be taken to give effect to the recommendations, the reasons for not taking all the steps necessary to give effect to the recommendations.

If it appears to the Archbishop that no steps he considers appropriate have been taken within a reasonable time, after giving the Executive Director and the ASC; or the Chair and the School's governing body, the report; and within that time, the Archbishop has considered any comments made by or for the Commission; and the Archbishop considers it appropriate; the Archbishop may refer the matter to the Archbishop-in-Council for consideration.

### Investigation Procedures

If the Archbishop decides that an investigation into a complaint is necessary, he will give the Executive Director and the ASC; or the Chair and the School's governing body, written notice informing them of the investigation and providing in general terms, the nature and extent of the complaint.

The Archbishop may seek assistance from the Executive Director; or the Chair, in the investigation of a complaint, including the production of;

- a) a particular document or other particular thing relevant to the investigation, or a copy of a particular document; or
- b) all documents of a particular type containing information relevant to the investigation, or copies of documents of the particular type.

The Archbishop, when responding to a complaint:

- a) will satisfy himself that the matter is not being or likely to be dealt with in a criminal, civil or industrial court or before a tribunal; and
- b) will satisfy himself that the matter is not one more properly dealt with under the provisions of the *Professional Standards Canon 2009* as amended; and
- c) will conduct the investigation in a way that maintains confidentiality; and
- d) will not be constrained by the rules of evidence, but will observe the rules of natural justice; and
- e) is not required to hold a hearing for the investigation; and
- f) may obtain information from the persons, and in the way he considers appropriate; and
- g) may make all inquiries he considers appropriate.

The Archbishop may refuse to investigate a complaint or, having started to investigate a complaint, may refuse to continue the investigation if he considers that:

- a) the complainant has not given the Executive Director and the Commission (or the Chair and the School's governing body) a reasonable opportunity to consider the matter of complaint; or
- b) the matter of complaint pertains to a civil, criminal or industrial issue, or is before or is likely to go before an appropriate adjudicative body; or
- c) the complaint does not have serious purpose, is vexatious or is not made in good faith; or
- d) the complainant does not have a sufficient interest in the action complained of; or
- e) the complainant has a right of appeal, reference or review, or another remedy, that the person has not exhausted and it would be reasonable in the circumstances to require the person to exhaust the right or remedy before the Archbishop investigates, or continues to investigate, the complaint; or
- f) the complainant had a right of appeal, reference or review, or another remedy that is exhausted and in the circumstances, the investigation, or the continuance of the investigation, of the action complained of is unnecessary or unjustifiable; or
- g) the complainant first had notice of the subject matter of the complaint more than 12 months earlier than the day on which complaint is made to the Archbishop. The Archbishop may accept a complaint outside the period

referred to above if he considers it is proper to accept the complaint because of the existence of special circumstances.

If the Archbishop cannot investigate a complaint; or refuses to investigate a complaint; or refuses to continue an investigation of a complaint; then he will inform the complainant, in writing, of the decision and the reasons for the decision as soon as reasonably practicable.

If it appears to the Archbishop that irretrievable consequences could result from the exercise of particular action, he may recommend to the Executive Director; or Chair, that the particular action be held in abeyance until the investigation is concluded. Without being exhaustive, unauthorised expenditure or the deletion or destruction of records are situations which might require this recommendation.

### **Pastoral Support**

If the Archbishop decides to conduct an investigation, he may appoint one or more persons to make contact with and provide pastoral support to the complainant; the Executive Director; or the Chair; and relevant School staff or volunteers.

### **Natural Justice**

If the Archbishop proposes to make an adverse comment about a person in a report, he will not make the proposed adverse comment unless, before the report is prepared, the Archbishop gives the person an opportunity to make submissions about the proposed adverse comment. If the person makes submissions and the Archbishop still proposes to make the adverse comment, he must ensure the person's defence is fairly stated in the report.

If, during an investigation of a complaint, the Archbishop considers there may be grounds for making a report and recommendations on the investigation that may affect or concern the ASC or the School, the Archbishop before making his report, will give the Executive Director and the ASC; or the Chair and the School's governing body, an opportunity to comment on the proposed report and recommendations.

If, during or after the investigation, the Archbishop considers there is evidence of a breach of duty or misconduct on the part of an employee or member of the ASC or School, he will give a report about the breach of duty or misconduct to the Executive Director; or Chair; and may, if he considers it appropriate in the circumstances, send a copy of the report to the ASC; or School's governing body.

### **Delegations**

The Archbishop may delegate to an officer of the Diocese or to an external person or agency, his powers to review a matter but not the power to make a report or recommendation to the ASC, or School's governing body.

### **Confidentiality**

The Archbishop, his delegate, the ASC, the School or an officer or employee thereof who obtains information in the course of a preliminary inquiry or an investigation will not disclose the information other than as a part of:

- a) the performance of the function; or
- b) formulating a report about the performance of the function; or
- c) formulating a recommendation arising out of the performance of the function; or
- d) as otherwise allowed by law.

## APPENDIX 1 Key Terms

### Complaint

A complaint, for the purpose of this Policy and Procedures, is a report of a grievance, problem, difficulty or concern made in relation to:

- an action, behaviour, omission or decision by the Principal or another School staff member or volunteer; or
- the actions or behaviour of a visitor to the School.

### Complainant

Any person who makes the complaint or their parent/guardian.

### Member of the School's leadership team

A member of the School's leadership team who is an appropriate authority in a School includes, but is not limited to:

- The Principal as the Head of the School. Also commonly referred to as the Headmaster
- The Deputy Principal, Heads of School, Assistant Heads, Deputy Heads, Deans and Directors

### Owned or Controlled Anglican Schools

Include:

Brisbane Diocesan Owned	Brisbane Diocesan Controlled
Anglican Church Grammar School	Cannon Hill Anglican College
Coomera Anglican College	St John's Anglican College
Fraser Coast Anglican College	The Springfield Anglican College
St Andrew's Anglican College	
St Hilda's School	
St Luke's Anglican School	
St Paul's School	
The Glennie School	
The Southport School	
Toowoomba Anglican College & Preparatory School	
West Moreton Anglican College	

### Principal

Means the person occupying the position of Principal or Head of the School.

### Procedural fairness

The right to be given a fair hearing and the opportunity to present one's case, the right to have a decision made by an unbiased decision-maker and the right to have that decision based on logically probative evidence.

### Separately Incorporated or Other Anglican Schools

Anglican Schools which are not Owned or Controlled Anglican Schools and have adopted this Complaints Management Policy and Procedures.

### Student Protection in Anglican Schools Policy and Procedures

The Student Protection in Anglican Schools Policy and Procedures details how the school will respond to concerns of harm or risk of harm to a student, including the reporting to Child Safety when there is a reasonable suspicion a student is in need of protection, the reporting to Police when there is a reasonable suspicion a student has been or is at risk of being sexually abused, and the management of reasonable suspicions of inappropriate behaviour by a school staff member or volunteer towards a student.

Reference to **sexual abuse** in this context refers to sexual behaviour involving the student and another person where:

- the other person bribes, coerces, exploits, threatens or is violent toward the student; or
- the student has less power than the other person; or
- there is a significant disparity between the student and the other person in intellectual capacity or maturity.

Reference to **sexual misconduct** is as per the Protocol for Dealing with Sexual Misconduct and includes conduct constituting sexual abuse of a student, as well as any:

- alleged conduct by a staff member, volunteer or other Church worker, wherever or whenever occurring involving sexual harassment or assault, or sexually inappropriate behaviour, grooming, or the possession, making or distribution of child exploitation material;
- alleged inappropriate or unreasonable conduct or omission by a staff member, volunteer or other Church worker, who had knowledge of conduct of another worker involving sexual harassment or assault, or sexually inappropriate behaviour, grooming, or the possession, making or distribution of child exploitation material;
- conduct relating to an alleged process failure.

### Visitor

A visitor to the School is any person who visits the School on a one-off or regular basis to provide services [paid or unpaid] to the School and is not considered a staff member or volunteer. This includes contractors, consultants and presenters of one-off programs.

### Volunteer

Consistent with the *Working with Children (Risk Assessment and Screening) Act 2000*, a person undertaking work for a School without receiving financial reward. 'Undertaking work' is understood to mean holding a position or performing a function with the actual or apparent authority of the School.

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This procedures document was published in **December 2018**.

Should additional information, material or assistance be required please contact:

Anglican Schools Commission

Email: [asc@anglicanchurchsq.org.au](mailto:asc@anglicanchurchsq.org.au)

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