

Intereach Family Day Care Complaints Procedure



Applies to	Intereach Family Day Care (FDC)				
Policy	NQF Two: Children's Health and Safety Policy				
Version	1.0	Date approved	14/10/2025	Next review date	14/10/2028

1. Objective

The objective of this procedure is to ensure that all children, families, educators, staff, and community members feel confident that any concerns or grievances raised will be managed promptly, professionally, and respectfully. Our approach is child-focused, culturally safe and honours the diverse values of families and communities.

We are committed to:

- Actively listening to Aboriginal and Torres Strait Islander perspectives.
- Incorporating trauma-informed practices into all aspects of our response and resolution processes.
- Creating a safe and supportive environment where feedback is welcomed and valued.

Intereach views complaints and grievances as an opportunity to reflect, learn, and identify areas for quality improvement.

This procedure supports and aligns with the Intereach Feedback and Complaint Policy

2. Background

The Education and Care Services National Regulations require approved providers to have policies and procedures in place for managing complaints.

3. Definition

Complaint: An expression of dissatisfaction about the service, staff, or environment.

Notifiable complaint: A complaint alleging a serious incident or a breach of the National Law.

Anonymous complaint: A complaint where the identity of the complainant is unknown.

Complainant: The person making the complaint, including a child or their advocate.

Grievance: A formal expression of dissatisfaction or concern raised by individuals

4. Responsibilities

It is the responsibility of the Approved Provider to:

- ensure that complaints alleging that a serious incident or a breach of the Education and Care Services National Law are reported to the regulatory authority within the required timeframes.

It is the responsibility of the Nominated Supervisor to:

- ensure that regulatory obligations are met in relation to complaints and grievances including notifying the regulatory authorities in writing within 24 hours of any complaints alleging sexual or physical abuse of a child has occurred or is occurring at the service and of any complaint alleging a serious incident or a breach of the Law;
- implement and follow the Family Day Care Complaints Procedure, Intereach Feedback and Complaints policy, Complaint handling guide and Child Protection procedure;
- communicate the feedback and complaints policy and Complaints procedures to families and the wider service community;
- provide effective complaints management which meets the needs of the families/guardians and children;

- Notify the Approved Provider of notifiable complaints or unresolved complaints;
- ensure staff, educators, volunteers and students are well informed about their child protection responsibilities, reporting and privacy obligations;
- ensure the name and telephone number of the person to whom complaints can be made must be clearly displayed at each Family Day Care residence (Regulation 173, Section.172);
- Maintain confidentiality of all complaints and grievances. Ensure procedure fairness and natural justice in handling complaints and grievances and
- investigate and document complaints or grievances fairly and impartially;
- work co-operatively with the Approved provider, educators, staff and/or the complainant during the investigation and resolution of a complaint;
- ensure educators, staff, volunteers and students are aware of ways children may express concerns or disclose harm, and the processes for responding to disclosures;
 - regularly review policies and procedures to ensure prompt, fair and thorough investigations of complaints and grievances
- ensure all complaints result in reviews and improvements of relevant policies, procedures and practices;
- handle complaints involving actual or potential privacy breach in accordance with the Intereach Data Breach Response Procedure. These breaches will be dealt with the Data Breach Responsible team and Quality will be responsible for updating the Data Breach Spreadsheet with all breaches reported as interfering with privacy; and,
- identify and report actual and potential conflicts of interest in line with the Conflict-of-Interest Policy.

It is the responsibility of the Quality Team to:

- monitor the handling of the complaints or grievances to ensure they are handled in accordance with the Intereach Feedback and Complaint Policy;
- provide internal support and guidance to employees in complaint handling and investigation; and,
- analyse outcomes of complaints or grievances and provide relevant reports to the Approved Provider.

It is the responsibility of the educators to:

- understand and implement the FDC complaints procedure and the Intereach Complaints and feedback policy;
- report all complaints or grievances received to the nominated supervisor and/or approved provider to ensure timeframes are met;
- support the nominated supervisor and approved provider in the investigation and resolving complaints or grievances.
- understand and be aware of child protection law and individual responsibilities
- recognise signs of concern or disclosures, respond appropriately and support children to identify trusted adults.
- assist families and children in raising a complaint when a concern arises or is identified;
- provide guidance to families and children in lodging a complaint whenever a concern is noted, including helping children understand how to raise complaints or concerns;
- promptly record feedback using the complaint handling form in line with this process.
- maintain privacy and confidentiality; and,
- comply with record keeping and reporting practices

It is the responsibility of parents/guardians to:

- be familiar with and follow the complaints policy and procedures;
- raise any complaints or grievances in line with the policy and procedures;
- raise any unresolved concerns with the Nominated Supervisor;
- cooperate with the Nominated Supervisor or staff dealing with complaints or grievances; and,
- maintain confidentiality at all times.

5. Procedure

5.1. Child Safe Practice

When a complaint is received refer to [Appendix 2 Child centred and Improvement focused child friendly complaints handling principles Poster.](#)

Complaints or grievances can be received through a variety of channels:

- email
- phone
- social media,
- conversations
- surveys,
- Intereach Website, in person.

And may relate to a variety of topics, including but not limited to:

- The quality of education and care provided
- Health, safety, and wellbeing concerns
- Communication between educators, families, and staff
- Cultural safety and inclusion
- Breaches of the National Education and Care Regulation and Law
- Intereach policy or procedure
- Complaints alleging that a child is exhibiting harmful sexual behaviour (See appendix)
- Educators conduct or professionalism
- Placement decisions or enrolment processes
- Fees, payments, or administrative matters
- Access to services or support
- Any other issue impacting a child, family, educator, or community member's experience with the Family Day Care service

All complaints or grievances regardless of how they are received or the topic they relate to, must be recorded in the Online Complaint System

5.2. Acknowledgement of complaints

Prompt acknowledgement of a complaints is essential to manage expectations and reduce dissatisfaction.

All complaints must be acknowledged:

- no later than three business days from the date the complaint was received; or,
- at the time of receipt, where received verbally.

Let the complainant know that the complaint is received, and action will be taken as soon as possible.

Acknowledgement can be made using the preferred contact method either verbally or in writing. Complaints are assessed and prioritised according to complexity and seriousness of the issues raised, which determines the urgency in which it is dealt with. Complaints are assessed under three levels as outlined in the table below:

Levels	Description	Handled by	Resolution time frame
1	Minor complaints that can be easily remedied and where a formal response is not requested; they do not require detailed investigation and are most often resolved quickly by providing an explanation or an apology.	Person receiving the complaint or Nominated Supervisor	24 hours
2	More complex, may involve multiple issues and require further investigation, or where a level 1 complaint is unresolved.	Nominated Supervisor	14 days
3	Complex, serious and sensitive issues including a complaint that: • is received from an Ombudsman, or a state or Federal Minister or Member of Parliament; • is received by a CEO or a Director; • involves multiple issues that require intensive investigation or involve other agencies; • is urgent or a potential high risk or a high-profile issue that may adversely affect the reputation of the organisation (for example involving media); • alleges a breach of the Intereach Code of Conduct, which includes; ▪ unauthorised access or disclosure of private and/confidential information, ▪ conflicts of interest, ▪ serious misconduct, and/or ▪ fraud. • is persistent and/or requires intensive management to progress or resolve it; or • is required by contract, regulation and/or legislation to be reported or referred to an authorised third party.	A Senior Manager or where there is no Senior Manager the relevant General Manager.	21 days

5.3. Recording the complaint

All complaints must be recorded using the e Intereach *Complaint Handling Form*, available on Intereach Intranet.

Once relevant information is gathered input the information into the Complaint System (Refer to *Intereach Complaint Guide*)

- Section one of the system will be completed by the person receiving the complaint.
- Section two to be completed by the person handling the complaint.
- A Quality officer will be allocated to assist in completing the investigation section of the Complaint System.

Documentation must include

- Date of complaint
- Summary
- Actions to be taken
- Outcome

Reportable complaints

- A complaint alleging that the National Law has been breached may include:
 - the physical environment;
 - the adequacy of education and care and programming;

- interactions between staff and children, including inappropriate behaviour or inappropriate discipline;
 - educator qualifications;
 - staffing arrangements and educator-to-child ratios;
 - children's supervision;
 - matters that impact the health, safety and wellbeing of children at the service;
 - how interactions between children are managed and supported; or
 - how behavioural challenges or medical needs of a child are managed and supported.
- An actual breach of the law does not have to be proven before a notification is made. Once an allegation is made of a breach of the National Law, you must notify the Regulatory Authority.
 - A breach of a law other than the National Law does not need to be notified to the Regulatory Authority but may need to be notified to other bodies for example not using the appropriate car restraints, theft

Upload all relevant documents relating to the complaint to the Complaint System in accordance with the Complaint Handling Guide. (Refer to 3.8.2). For example, a copy of the original complaint (if received in writing), evidence of actions being taken in response to the complaint, and any outstanding risks to the safety, health and wellbeing of children.

5.4. . Investigation

The nominated supervisor or approved provider will investigate the complaint/ grievance by:

- developing an investigation plan which consults necessary bodies, considers the child's needs, safety and wellbeing and does not compromise a police or child protection investigation.
- analysing and assessing the evidence gathered and make an assessment, where the complaint meets the reporting threshold report to the regulatory authority
- discussing the nature of the complaint (or breach) and giving the person identified in the complaint (FDC educator, staff member, volunteer, parent or visitor) an opportunity to respond. staff members who are the subject of a complaint will be treated with fairness and provided with access to support, including debriefing or HR referral as required.
- permitting the person identified in the complaint to have a support person present during the consultation
- providing the complainant with a clear written statement outlining the outcome of the investigation.
- ensuring the procedure is child-focused and addresses concerns of any child
- ensuring children are taken seriously and any disclosures of harm from any other person including other children will be addressed effectively (including a complaint of a child exhibiting sexual behaviours that may be harmful to the child or another child.)
- ensure the complaint system is updated with detailed information and all relevant documents attached.

5.5. Outcome

- Consider privacy, confidentiality and procedural fairness when providing the outcome of the complaint to the complainant and other stakeholders.
- Explain the outcome of the complaint to the complainant / child in their preferred method of communication and provide them with any necessary supports.
- Ensure the complainant is aware of the avenues for reviewing and/or appealing if they aren't satisfied with the outcome.
- Provide the complainant the opportunity to comment on any adverse information.

5.6. Closure of the complaint

Inform the complainant of the outcome of the investigation in a manner that they understand. Ensure that when delivering the outcome, the child has support available to them and their wellbeing is prioritised.

- Record details and update the complaint system including.
- outcome
- How the complaint was managed
- Recommendations or outstanding actions
- Ask the complainant to give feedback on how they felt their complaint was handled.
- Provide ongoing support to the complainant if they require or want it.
- Provide a written response to the complaint. A copy of the letter/email must be uploaded as an attachment to the related complaint record. The Complaint Template Response Letter can be used as a guide to develop the response specific to the complaint and can be emailed or posted to the complainant.
- In instances where a written response to a complaint has not been completed, it's imperative to provide an explanation within the complaint record explaining the reason for the delay or absence of response
- Update QIP or Intereach Continuous Improvement if any improvements or review of documentation are identified.

5.6.1. Escalation

If unresolved, complaints may be escalated to the State/Territory Regulatory Authority;

NSW

Phone: 1800 619 113

Email: ececd@det.nsw.edu.au

Victoria

Phone: 1300 307 415

Email: licensed.children's.services@education.vic.gov.au

5.7. Confidentiality and Privacy

Only permit the disclosure of information about a child or young person in accordance with the Intereach Privacy Policy. Intereach Children's Services will respect the right of children to lodge a complaint anonymously, and their personal information will not be revealed unless it is required to resolve or investigate the complaint or where statutory obligations apply.

The services will take reasonable measures to protect personal information from loss, unauthorised access, use, disclosure or any other misuse during the complaint-handling process.

The person handling the complaint will seek to balance fairness and confidentiality requirements and where possible, safeguard the interests of all parties and will not give information about a reportable allegation to the parent or carer of a child except with the consent of the child protection authority.

5.8. Systemic Improvement

Trends and recurring themes from complaints will be reviewed quarterly to identify systemic issues and inform policy, practice, and quality improvement planning

6. Monitoring, evaluation, and review

This procedure will be reviewed every three years or where a requirement under regulation changes and incorporate feedback and suggestions from children, families, educators, coordinators, volunteers, students and community.

7. National Quality Framework

Element	Concept	Description
2.1	Health	Each child's health and physical activity is supported and promoted.
2.2	Safety	Each Child is protected
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practised and implemented
2.2.3	Child Safety and protection	Management, educators and staff are aware of their roles and responsibilities regarding child safety, including the need to identify and respond to every child at risk of abuse or neglect.
4.1	Staffing arrangements	Staffing arrangements enhance children's learning and development.
4.2	Professionalism	Management, educators and staff are collaborative, respectful and ethical.
4.2.1	Professional collaboration	Management, educators and staff work with mutual respect and collaboratively, and challenge and learn from each other, recognising each other's strengths and skills.
4.2.2	Professional standards	Professional standards guide practice, interactions and relationships.
5.1	Relationships between educators and children	Respectful and equitable relationships are maintained with each child.
5.1.1	Positive educator to child interactions	Responsive and meaningful interactions build trusting relationships which engage and support each child to feel secure, confident and included.
5.1.2	Dignity and rights of the child	The dignity and rights of every child are maintained.
5.2	Relationships between children	Each child is supported to build and maintain sensitive and responsive relationships
5.2.1	Collaborative learning	Children are supported to collaborate, learn from and help each other.
5.2.2	Self-regulation	Each child is supported to regulate their own behaviour, respond appropriately to the behaviour of others and communicate effectively to resolve conflicts.
6.1	Supportive relationships with families	Respectful relationships with families are developed and maintained and families are supported in their parenting role.
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe.
7.2.1	Continuous improvement	There is an effective self-assessment and quality improvement process in place.

8. Context	
8.1. Standards or other external requirements	▪ Australian Children's Education and Care Quality Authority <i>National Quality Standards</i> ▪ Australian Children's Education and Care Quality Authority <i>Guide to the National Quality Framework</i> ▪ Department of Education, Child Care Provider Handbook 2024 ▪ Early Childhood Australia (2016). <i>Code of Ethics</i>
8.2. Legislation or other requirements	▪ Education and Care Services National Regulations - Regulations 174A,143B,168,169,170,171,172,173,173A,176 ▪ Education and Care Services National Law Act 2010 – ▪ Children, Youth and Families Act 2005 (Vic) ▪ Children and Young Persons (Care and Protection) Act 1998 ▪ <i>Privacy Act 1988</i>
8.3. Internal Documentation	Intereach Feedback and Complaint Policy Intereach Complaint Handling Guide Intereach Conflict of Interest Procedure Intereach Privacy policy Intereach Child Protection Procedure Intereach Abuse and Neglect Policy Intereach Data Breach Procedure Complaint template – response letter Complaint no response letter template Complaint investigation form and Complaint handling form

9. Document control			
▪ Version	Date approved	Approved by	Next review date
1.0	14/10/2025	Kerri-Anne Hyde - General Manager, Operations	14/10/2028

Appendix 1

Concerns Or Complaints Involving Children Exhibiting Sexual Behaviours

All complaints alleging that a child is exhibiting harmful sexual behaviours will be taken seriously, actioned immediately and ensure confidentiality is maintained.

When receiving a complaint or grievance alleging a child is exhibiting harmful sexualised behaviours, the person receiving the complaint will.

- Acknowledge the complaint
- listen without preconceive judgement, allowing the child, family member, or other personal to describe the incident
- Reassure the complainant that their concern has been taken seriously
- Do not make assumptions or promises about outcomes
- Use objective language, avoiding interpretation or diagnoses

Assess the Behaviours

Ensure informed professional judgements are made regarding sexualised behaviour involving children taking into consideration that not all sexual behaviour involving children poses a risk to their safety. It may be age-appropriate and expected sexualised behaviour.

- Use the 'Traffic Light Tool' Child-Protection-Guide-Traffic-Lights-Sexual-Behaviours.pdf
- Assess if the behaviour is:
 - **Green** (developmentally typical),
 - **Amber** (concerning, needs monitoring)
 - **Red (serious, needs immediate intervention).**

Document the complaint including date and time, name of complaint (if known), details of the behaviour alleged (who, what, when, where)

Refer to Child Protection Procedure

- Follow the Intereach Child Protection procedure on mandatory reporting requirements, including contacting emergency services if required
 - Document that a report was made

Report to the Nominated Supervisor for further guidance and support, who will ensure the Regulatory Authority is notified via the NQAITS within 24 hours of the complaint alleging that a serious incident has occurred whilst a child is educated and cared for or complaints alleging that the Law has been contravened

Maintain confidentiality and privacy in accordance with the Service's Privacy and Confidentiality Policy

Ensure Immediate Safety and Supervision

- Separate children calmly, if the behaviour could recur.
- Maintain normalcy and avoid labelling the child with alleged Problematic Sexual Behaviour (PSB)

Notify Parents/Guardians Appropriately

- Communicate with both sets of parents (those of the child with PSB and the affected child), unless it poses a risk.
- Use language that is sensitive and non-accusatory.
- Refrain from sharing personal information about other children.

Support and Referral

- Provide emotional support to families and staff.
- Arrange referrals for (if required)
 - Child psychology or specialist services.
 - Family support services.

Appendix 2

Child centred and Improvement focused child friendly complaints handling principles



For everyone under 18	All complaints affecting any child will be handled in a way that meets their rights under the UNCRC This includes complaints raised directly by a child, as well as complaints raised by an adult, either on a child's behalf, or about matters that affect a child
Focused on Children's Best Interest	The best interests of any children affected will be at the heart of the complaints process. This means all decisions made or actions taken will treat the best interests of any children affected as a top priority
Trusting and inclusive	Trust will be placed in children to make decisions they can manage, recognising their increasing ability to make their own choices. Complaints will be handled in a way that empowers children to realise their rights. They will also be handled in a way that respects the rights of their parent/s or other responsible adult/s to guide, support and direct them. A child may not wish their parent/s or other responsible adult/s to be made aware of their complaints. If this is the case, adult involvement will be decided by carefully weighing the child's views, best interests, age, and capacity, with the rights of others involved
Centred on Children's Voices	Children will be given the chance to express their views, feelings and wishes in all matters that affect them, to the extent they wish to. Children's voices and views will always be listened to and taken seriously. The impact of their views will be shared with them and explained.

	Children will be asked how they want to communicate and things will be done their way whenever possible. Children's communication needs will be met in a way that makes them feel safe and involved. Informed consent will be sought from the child affected where a complaint has been raised by parent/s or other responsible adult/s on behalf of the child
Kind and Supportive	Children will be treated with kindness and always understanding, and they will never be treated differently for raising a complaint. This is essential to foster trust and help children to feel able to openly express themselves Every effort will be made to ensure children feel comfortable to express their thoughts and opinions freely and openly. Wherever possible, children will be supported to complain or voice concerns by people they know and trust. Where a child does not feel they have anyone to support them, they will be offered a referral to independent advocacy
Private and confidential	Nothing a child shares will be passed on without their permission, unless doing so is required to raise a child protection concern or meet another legal duty. Before speaking with any child about a complaint, explanations will be given about when things may need to be passed on without their permission. This will include explaining what happens if they say something that suggests they are at risk. If a child's complaints must be shared, or their parent/s or other responsible adult/s involved, they will be told this, and why it needs to happen. If a child's complaints are shared this will be done as far as possible without identifying them. Where an investigation might mean other people could identify the child, this will be discussed with them for their views on whether they wish to continue
Knowing about Rights	Information will be provided to children and any parent/s or other responsible adult/s about their rights, and they will be helped to understand what this means for them