

PADEA EDUCATION

# Complaints Handling Policy

## 1. Purpose

Padea's Complaints Handling Policy explains how anyone can raise a complaint, concern, disclosure or allegation about the safety and wellbeing of a child, or about any Padea service – and how Padea responds. This policy replaces all other pre-existing Padea complaints handling policies.

## 2. Scope

This Policy applies to all Padea workers, anyone acting on Padea's behalf and anyone who wants to raise a complaint, concern, disclosure or allegation.

## 3. The Policy

### a. What Can Be Raised, and by Whom

#### i. What Can Be Raised

Padea receives several kinds of matter. Terms defined in the Child Safety and Wellbeing Policy have the same meaning in every Padea child safety document, and are used in this policy as follows:

Type	Definition
Complaint	An expression of dissatisfaction with a Padea service, decision or worker.
Concern	A sense that something may be wrong for a child, where there is no specific incident or allegation.
Disclosure	When a child tells someone, directly or indirectly, that they or another child has been abused or harmed.
Allegation	A specific claim, not yet proven, that a person has abused or harmed or risked abusing or harming a child.
Incident	Any complaint, concern, disclosure or allegation relating to child safety or wellbeing.
Service Matters	Complaints, requests or feedback about Padea's services that do not concern a child's safety or wellbeing.

A matter may be raised about anyone, including the Director, the Coordinator, a Manager or a Tutor, and any adult who is not a Padea worker, such as a guardian or family member, a Partner School staff member or any other adult. It may also involve abuse or harm caused by one student to another. A matter need not be proven, formal or in writing: a suspicion that a child has been or may be abused or harmed is itself a concern, and no certainty or evidence is required to raise it. A matter may change type as more becomes known, and Padea handles it under whichever type fits as the facts emerge. A breach of the Code of Conduct may also be raised under this policy, whether or not it concerns a child's safety; the Code of Conduct sets out how it is handled. If in doubt, raise it.

#### ii. Who Can Raise It

Anyone may raise a matter, including students, families, guardians, workers, partner school staff and community, and there is no time limit on doing so: Padea receives

and acts on matters about events from any time in the past, including matters about people who are no longer at Padea.

Whatever a student's age, Padea treats every student as a child when a matter is raised, and workers follow the same steps. Where a student is 18 or over, the Director applies adult pathways from that point, and the student's own wishes govern external reporting and contact with their family.

## **b. Raising a Matter**

If a child is in immediate danger, call **000** first. You can raise a complaint, concern, disclosure or allegation with Padea through any of the channels below.

Channel	What it is and how to use it
Manager	The adult in charge of the session on site. Talk to them at any time during a session.
Coordinator	The first point of contact for all families and students, for every kind of matter. Contact via <a href="mailto:families@padea.com.au">families@padea.com.au</a> .
Director	Padea's Child Safety Officer, ultimately responsible and accountable for every child safety and wellbeing matter. Contact via <a href="mailto:dylan@padea.com.au">dylan@padea.com.au</a> .
IRF	Online at <a href="https://padea.fillout.com/incident-reporting-form">https://padea.fillout.com/incident-reporting-form</a> . Use it for any complaint, concern, disclosure or allegation, about anyone. A report can be anonymous, and Padea acts on each one; anonymity may limit how far Padea can follow up and means Padea cannot confirm back to you what was done.

Every Incident Reporting Form submission notifies both the Director and the Coordinator, so no ordinary matter rests with one person; a submission that names or concerns the Director is routed to the Coordinator, and to any engaged external child-safe adviser, alone, so the Director never sees it. If your matter involves the Director, or the Director has an actual or perceived conflict of interest, raise it with the Coordinator, flag it on the form, or take it outside Padea to the Queensland Family and Child Commission (QFCC, [www.qfcc.qld.gov.au](http://www.qfcc.qld.gov.au)), which handles concerns about Padea's child-safety practices, including concerns about the Director.

Nothing in this document, or in any Padea document, prevents or delays any person reporting directly to the authorities at any time; no one needs permission to report externally, and Padea does not need, and will not seek, anyone's consent before reporting a child-safety matter. Where the law requires more than this document, the law prevails, and certainty is never required before reporting. Every report comes back, in writing, to the person who raised it. You may also raise a matter through the partner school's own channels; doing so is never a breach of any Padea document.

If you believe a child sexual offence has been committed and no written confirmation reaches you within 24 hours, contact the police yourself. Doing so is never a breach of any Padea document and will never be criticised.

Separately from raising a matter, free and confidential support is available to anyone affected. These are support services, not reporting channels, and contacting one is not the same as raising a matter with Padea or reporting to the authorities. Young people aged 5 to 25, including students, can reach Kids Helpline on 1800 55 1800 at

any time of day or night. Parents and carers in Queensland and the Northern Territory can reach Parentline on 1300 30 1300, from 8am to 10pm every day. Aboriginal and Torres Strait Islander people can reach 13YARN on 13 92 76 at any time of day or night, for crisis support run by Aboriginal and Torres Strait Islander people. To raise a matter with Padea, use one of Padea's channels above.

### **c. Internal Handling**

Padea handles every complaint, concern, disclosure and allegation by taking responsibility, responding without delay, supporting the people involved and recording what happened.

#### **i. Responsibility**

The Director is Padea's Child Safety Officer and is responsible for every child safety and wellbeing matter. The Director decides how each matter is handled and is accountable for the outcome. The Coordinator is Padea's Deputy Child Safety Officer and takes responsibility when the Director is unavailable or is the subject of the complaint, concern, disclosure or allegation.

A worker who receives a complaint, concern, disclosure or allegation reports it to their Manager or the Director without delay, does not investigate it and does not promise a child confidentiality. Many people may contribute to one matter, but Padea lodges one report per matter. Padea's Code of Conduct and training prepares every worker to prevent, recognise and respond to abuse and harm. The Child Safety Governance document sets out the full responsibilities and reporting requirements.

#### **v. Responding**

Padea acknowledges and acts on every complaint, concern, disclosure or allegation without delay, and dismisses none. The statutory timeframes for external reports still apply, and Padea meets them in full. Padea handles every matter with care, and keeps families informed, within the limits of confidentiality and the law, unless telling a family would put the child at greater risk.

Every matter is handled as set out above. External Reporting (3d) and Coordination with Partner School (3e) apply wherever relevant. The procedures below are specific to each type of matter.

Type	Procedure
Complaint	Padea looks into the complaint, responds to the person who raised it and explains the outcome. If the complaint reveals a risk to a child, Padea handles it as a concern.
Concern	The Director assesses the available information and decides whether there is a reasonable suspicion or belief that a child has been or may be abused or harmed. In the meantime, Padea takes all reasonable steps to protect the child's safety and wellbeing.
Disclosure	The worker who receives the disclosure calmly listens and takes the child seriously. The worker does not investigate the matter and does not promise the child confidentiality. The worker records what the child said in the child's own words as soon as

	possible and reports it to their Manager, the Director or using the <a href="#">Incident Reporting Form</a> without delay.
Allegation against a worker	Padea takes precautionary action to keep children safe as a safety measure, not a finding against the worker. Padea makes any external reports and informs the Partner School. It coordinates any conduct process with the relevant authorities, so it does not prejudice their investigation, and gives the worker a fair process.
Harm between students	Padea protects the child who was harmed and supports them. Padea sets clear boundaries for the child who caused harm and supports that child too. Padea tells the guardians of those involved and seeks specialist guidance where needed. Padea makes any external report and informs the Partner School.

#### v. Support

Padea supports everyone involved in a child safety and wellbeing matter. Padea keeps the child at the centre, supporting them and keeping them informed in language they understand. Padea takes the person who raised the matter seriously and keeps them informed within the limits of confidentiality and the law. Padea tells the subject of a complaint, concern, disclosure or allegation its substance, so far as that does not compromise a child's safety or an investigation, and gives them a fair chance to respond and a clear outcome.

Padea protects anyone who reports in good faith. Padea will not permit retaliation of any kind against anyone who reports in good faith or who similarly participates in the investigation of any such matter. A good-faith report carries no civil, criminal or administrative liability (Child Safe Organisations Act 2024 (Qld) s59). Taking detrimental action against a person because they reported is an offence (ss60–61).

Padea adjusts where needed so the process for raising a complaint, concern, disclosure or allegation is accessible to everyone, including students with disability, students and families from culturally and linguistically diverse backgrounds and LGBTIQ+ students.

#### vi. Confidentiality and Records

Padea keeps information about a complaint, concern, disclosure or allegation confidential and shares it only on a need-to-know basis or as required by law. Padea protects the identity of anyone who reports, so far as the law allows. Padea handles personal information in line with applicable privacy law. Padea records every complaint, concern, disclosure or allegation and how it was handled, and stores these records securely with controlled access. Padea retains records in line with legislative requirements.

#### **d. External Reporting**

Padea's internal handling never replaces or delays a report required by law. Padea makes its own external reports and, where a child may be at risk of abuse or harm, reports whether or not the law requires it. Padea reports each of these situations to the relevant authority:

- A child in immediate danger: Emergency Services, 000.

- A reasonable belief that a child sexual offence is being or has been committed against a child by another adult: Queensland Police, 131 444, as soon as reasonably practicable (Criminal Code s229BC).
- A reasonable suspicion that a child has suffered, is suffering, or is at unacceptable risk of suffering significant harm: the Department of Families, Seniors, Disability Services and Child Safety, your regional Child Safety Service Centre in business hours, or the Child Safety After Hours Service Centre on 1800 177 135.
- Criminal conduct by a Padea worker: Queensland Police, 131 444.
- A concern about a worker's suitability to work with children: Blue Card Services, 1800 113 611.
- A concern about Padea's child safety practices: the QFCC, [www.qfcc.qld.gov.au](http://www.qfcc.qld.gov.au).

Criminal Code s229BC binds every Padea worker personally, not only Padea. Padea workers are not mandatory reporters under the Child Protection Act, but Padea adopts its threshold and reports regardless. The Child Safety Governance document carries the full External Reporting table.

### **e. Coordination with Partner School**

Every Padea student is also enrolled at the Partner School where their session is held. The Partner School carries statutory obligations Padea does not. A matter can be missed or mishandled when each organisation assumes the other is handling it. To prevent this, Padea acts in this order for every incident:

1. Makes its own external reports first, as set out in Section 3d. Padea never assumes the school has handled or reported a matter, or that it will.
2. Notifies the Partner School's nominated child-safety contact (by default, the principal) without delay, whether or not any external report was required, and without waiting for business hours, so the school can meet its own child safety and wellbeing obligations.
3. Cooperates fully with the school or any authorities, within the law. Padea does not investigate the suspected abuse or harm itself, and never investigates school staff. Padea does not promise a family how the school or authorities will act. Padea takes all reasonable steps to protect the child and support the family in the meantime.

Notifying the Partner School is Padea's own policy, never a statutory duty, and Padea never states it otherwise. Padea informs the Partner School of every incident that involves its campus, its students or its arrangements with Padea; service matters are raised with the school only where relevant to the partnership. The one exception is where notification would put a child at risk or compromise a report to, or an investigation by, the authorities. This operates as a deferral, never an exemption: Padea records the reason and the decision-maker, tells the authority the school is awaiting notification, and notifies the school the moment the risk passes.

Padea notifies the school through a written notice prepared for that purpose, not by disclosing the Incident Reporting Form itself. The notice records what happened, in the terms of Section 3a; what Padea has reported externally, to whom and when, each identified as required by law or as Padea policy; the protective steps Padea has taken; the details the school needs for any obligations it has under the reportable conduct scheme; who at Padea is handling the matter and the agreed plan for communicating with the family; and anything Padea asks of the school.

Informing any school staff member of sexual abuse, or likely sexual abuse, of a student enrolled at the school engages the school's own statutory chain: the staff

member must report in writing to the principal immediately, and the principal immediately to the police (Education (General Provisions) Act 2006 (Qld), chapter 12, part 10). This obligation binds the school, not Padea, and is a further reason Padea's own reports always come first and no Padea adult relies on telling the school to discharge their own duty under Criminal Code (Qld) section 229BC. Where the Partner School is a reporting entity under the reportable conduct scheme, an allegation about a Padea worker may be notifiable by the school under its own obligations; Padea cooperates fully with any such investigation, providing information and records and making workers available, but has no reportable-conduct reporting obligation of its own. Padea keeps this regulatory position under review and re-checks it each year.

Where a matter involves a child who is not enrolled at the Partner School, Padea acts to protect that child as it would any child: it makes any external report the matter requires (Section 3d), which never depends on knowing the child's school or family. Where the child's own school or guardians are known to Padea and notifying them protects the child, Padea also does so; where they are not known, Padea informs the authorities of what it knows so they can identify and protect the child.

#### **4. Policy Ownership**

The Director owns this Policy and approves every change to it. For any questions about this Policy, please contact Dylan Chern at [dylan@padea.com.au](mailto:dylan@padea.com.au).

The current version of this document, and of every Padea child safety document, is publicly available at [www.padea.com.au/legal](http://www.padea.com.au/legal). A printed copy is available on request.

