




Policy	Complaints Policy
Policy Owner	Chair of the Safeguarding Committee
Approved Date:	DD Month YYYY

Version Control			
Next Policy Review:	<Insert DD Month YYYY – 2 years from effective date>		
	As per best practice, all Wesley College child safety policies are reviewed every 2 years. However, all policies can be subject to an earlier review if deemed appropriate.		
	Signature	Name and Position	Date
Approved By:		Charlotte Saunders, Deputy Principal and Chair of the Safeguarding Committee	19/03/2025
Endorsed By:	<Signature>	XXXX, Chair, School Trust Board	DD/MM/YYYY
	<Signature>	XXXX, Chair, Trust Board	DD/MM/YYYY

OTHER APPLICABLE DOCUMENTS

SUPPORT DOCUMENTS AND RESOURCES:	<p>The following documentation and resources underpin or support this Complaints Policy:</p> <ul style="list-style-type: none"> Complaint Processes Complaints Form Complaints Record Form Policy Review Schedule Safeguarding and Child Protection Procedures
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	<ul style="list-style-type: none"> ▪ Complaints Register ▪ Incident Form and Incident Form Body Maps ▪ Investigation Policy and Procedures ▪ Safeguarding Database. ▪ Staff Code of Conduct ▪ Student Code of Conduct
<p>OTHER APPLICABLE POLICIES AND PROCEDURES</p>	<p>The following policies and procedures align with this Complaints Policy:</p> <ul style="list-style-type: none"> ▪ Board Code of Conduct ▪ Disciplinary Rules and Procedures ▪ Historical Allegations of Abuse Policy ▪ Induction, Training and Education Strategy and Programme ▪ Policy Breach Protocols ▪ Protected Disclosures Policy ▪ Record Keeping Policy ▪ Recruitment, Selection and Onboarding Policy ▪ Social Media Policy ▪ Student Empowerment and Participation Policy <p>Additional information on any of these specific points needs to be sourced directly from these policies.</p>

GLOSSARY OF TERMS

The first time each defined term is used in this policy text, it will appear in **bold** type.

Term	Definition
A Child / Young Person	<p>Wesley College students reflect an age range of 12 – 19 years. As per the Children's Act 2014 and the UN Convention on the Rights of the Child, we recognise a child as someone aged from 0-18 years.</p> <p>We mostly recognise a child as a person under 14 years and a young person as someone aged 14 -18 years.</p> <p>However, this policy supports those aged 18 years or older when meeting additional Children's Act 2014 definitions, and we primarily define those aged 18 or over as a young adult.</p>
Child Abuse	<p>Section 2, Oranga Tamariki Act 1989 defines child abuse as: “child abuse means the harming (whether physically, emotionally, or sexually) ill-treatment, abuse, neglect or deprivation of any child or young person.”</p>
Child protection	<p>Is the activity taken to protect those individual children/young people who are at risk of, or who are suffering from, abuse and/or neglect.</p>
Child Safe	<p>Refers to an organisational/school environment that has an open and aware culture, understands child abuse, is supported by robust safeguarding policies, promotes the empowerment and participation of children, identifies and manages child safety risks, and expects all stakeholders to report any allegations, disclosures or concerns for the safety and well-being of children. A child safe environment also ensures that children and young people are culturally safe.</p>
Complainant:	<p>Refers to the person raising the complaint.</p>
Complaint:	<p>Refers to any matter ranging from a general expression of dissatisfaction with a service provided by Wesley College to a particular experience with a person or persons involved with the College to an allegation of misconduct, policy non-compliance, abuse or exploitation, to an issue with the complaints management process¹.</p>
Conduct	<p>The manner in which a person behaves, especially on a particular occasion or in a particular context.</p>
Contact	<p>As per the Children's Act 2014, we recognise 'contact' with students as including in-person or online contact (e.g. online learning, social media, etc.) or contact via technology resources (e.g. email, phones, imagery, etc.).</p>

¹ Complaints, as defined in the Australian and New Zealand (A/NZ) Standard Guidelines for complaint management in organisations (AS/NZS 10002:2014). Adapted from *Complaint Handling Guide: Upholding the rights of children and young people* (2019), Commonwealth of Australia, Department of the Prime Minister and Cabinet

Cultural Safeguarding	<p>Cultural Safeguarding promotes the positive recognition and celebration of cultures. It is more than just the absence of racism or discrimination and more than cultural awareness and cultural sensitivity. A culturally safe environment is socially and emotionally safe, as well as physically safe for tamariki/children and rangatahi/young people. It is underpinned by shared respect, shared meaning, shared knowledge and experience, and living and working together with dignity and truly listening.²</p>
Safeguarding	<p>Safeguarding means being proactive in adopting risk-reducing approaches to support and protect a person’s health, well-being and child/human rights, enabling them to live free from harm, abuse and neglect. Safeguarding also supports any concerns relating to harm, abuse and neglect that are present, being identified early and prevented from continuing or escalating via child/adult protection processes, which are part of the overall safeguarding process.</p>
Safeguarding Complaint:	<p>Any complaint that indicates or refers to:</p> <ul style="list-style-type: none"> ▪ Misconduct in relation to child/young person safety. ▪ Non-compliance with safeguarding policies. ▪ Child abuse or a belief(s), concern(s), suspicion(s) or allegation(s) related to child abuse. ▪ A belief(s), concern(s), suspicion(s) or allegation(s) related to child safeguarding misconduct/ non-compliance.
Staff	<p>Wesley College defines “Staff” as any person serving, working at or representing Wesley College or our Boards. Inclusive of whether that person is in a paid, voluntary or contracted position; a permanent or temporary role, a teaching or non-teaching position. Due to the nature of being a school, it is also irrelevant whether that person is in a direct or non-direct student-facing position.</p>
Subject of the complaint:	<p>The person whose conduct is the focus of a complaint.</p>
Vulnerable	<p>This policy notes the term vulnerable as meaning someone who is or could experience circumstances that increase theirs or those, they are responsible for, likelihood of risks that could impact on well-being or safety, including risks of possible harm, abuse or neglect.</p>
Well-being	<p>Well-being represents the whole person, their physical health, development and safety, their psychosocial and emotional development, their social development and behaviour, and their cognitive development and educational achievement. Well-being also includes the welfare of that person.</p>

² Revised from An Overview of the Victorian Child Safe Standards (November 2015) -State of Victoria, Department of Health and Human Services and A Guide for Creating a Child Safe Organisation (Version 2.0 December 2015)- Commission for Children and Young People

**Whaanau /
Family**

Extended family or family group. May include:

- Members of a child or young person's family network, including those who do not have kinship ties but are seen as part of the child or young person's group.
- All stakeholders engaged or associated with Wesley College.

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OUR COMMITMENTS

A. Our Vision	When service is my well-being, my well-being is served.			
B. School Motto	Fide By Faith	Litteris By Learning	Labore By Hard Work	
C. Kairangi / Values	Family	Respect	Excellence	Responsibility
D. Special Character	<p>This policy upholds our Special Character:</p> <ul style="list-style-type: none"> ▪ We are Christian in practice. ▪ We are Methodist in ethos. ▪ We are accepted as we are. ▪ We are called to be the people of God and to do God's work. ▪ We belong to the Wesley College family and the family of God. 			
E. Methodist Ethos	<p>This policy upholds our Methodist Ethos in:</p> <ul style="list-style-type: none"> ▪ Treasuring our Christian heritage and learning to express it relevantly. This includes religious observances. ▪ Openness to the future and to new insights, experiences and people. ▪ Support for values that respect the integrity of persons and communities. ▪ Consideration of the needs of others, especially the marginalised. ▪ Use of language and images that are inclusive and which express equality. ▪ Provision of safe environments in which students can learn to live and work together in harmony. ▪ Opposition to cultures of violence and to systems of domination and exclusion. ▪ Processes for dealing with conflict, harassment, abuse and violation. 			
F. Te Tiriti O Waitangi / The Treaty of Waitangi	<p>The Methodist Church of New Zealand - Te Haahi Weteriana o Aotearoa is a Treaty-based Church that expresses its governance in a bi-cultural, power-sharing partnership between Te Taha Māori and Tauīwi.</p> <p>Wesley College has an obligation and a commitment to develop policies and practices that reflect New Zealand's dual cultural heritage and expects all students, staff and its community to embrace and promote inclusivity, including the rights and responsibilities accorded by Te Tiriti o Waitangi/Treaty of Waitangi. Wesley College is committed to Ka Hikitia.</p>			

G. Diversity, Equality and Inclusion

Wesley College is proud of the diverse communities it represents and believes that a balanced and inclusive approach to working with and for the community results in a just experience for all. Our Methodist special character is at the forefront of all we do. We seek to achieve equitable outcomes for all students. We ensure equal opportunities and provide inclusive and equitable means for all students to participate in and succeed in the full range of school activities. In addition, the College will adopt policies and practices that identify and cater for the individual needs of each student in the School.

H. To Child Safety

Wesley College provides educational and residential boarding services for approximately 250 rangatahi (youth) aged between 13 and 19. Wesley College is committed to creating a “Safe Environment” and to ensure the well-being of everyone under Wesley College’s care. Therefore, Wesley College has a zero-tolerance stance on **child abuse** and neglect as part of our commitment to a holistic approach to **safeguarding**. Wesley College takes all reasonable steps to ensure the welfare and well-being of rangatahi remains our priority.

Aotearoa/New Zealand has significantly high levels of child vulnerability, abuse, and neglect, and these **child safety** risks do not discriminate. They can be relevant to personal, professional and community environments. Our history has evidenced Wesley College as not being immune to these risks. Hence, we are committed to applying our learnings and strengthening our child safeguarding and protection processes and creating a culture that safeguards everyone, **children/young people**, whaanau/family, **staff** and the College.

We seek to advocate and uphold rangatahi’s rights to safety and protection and empower their voice and participation in our safeguarding journey. This includes us creating safe channels and environments to support rangatahi, whaanau and staff in speaking up and speaking out on any child safety complaints or concerns. Wesley College commits to providing designated safeguarding staff and to operating above legislative requirements by leading safeguarding and **child protection** best practices in all our undertakings.

1. PURPOSE

All children and young people have rights, including the right to be safe and protected from harm and abuse. At Wesley College, upholding student's rights to well-being and safety is paramount.

The purpose of this policy is to ensure the College provides a safe and effective child-focused complaints process for tamariki, rangatahi, whaanau, staff and the wider community. It is designed to ensure that:

- Tamariki, rangatahi and whaanau have access to a complaint system that promotes their rights and prioritises their safety and well-being.
- Staff are informed of the College's expectations should a student or whaanau member contact them to make a complaint.

2. SCOPE

This Complaints Policy and Procedures apply to:

- Wesley College staff (per this policy's definition) inclusive of whether that person has direct or indirect **contact** with students.
- All students and the whaanau/families of students who wish to make a complaint about Wesley College's services or staff.
- All staff and members of the community who wish to make a complaint about any aspect of Wesley College's services or staff.
- All our programmes, services and environments, including those utilising online platforms or E-Technology.

Wesley College seeks to ensure this Complaint's Policy is communicated to students, whaanau and staff to ensure they know how to make a complaint and what to expect from Wesley College's complaint management process.

Complaints can be made to Wesley College about:

- Any aspect of the services Wesley College provides.
- Any practice, policy or procedure.
- Staff behaviour or conduct.
- Any decision made about service changes, engagement or support.

3. PRINCIPLES

The requirements of this policy reflect child safety best practices and are designed to further support the College in creating and embedding a safeguarding culture. A culture that safeguards everyone, students, staff and the school. While not exclusive, this policy is reflective of the following child safety principles:

- Us taking every measure possible to ensure Wesley College is a safe school with zero tolerance for **child abuse**.
- We recognise and want to ensure that all College students and whaanau have a right to express their views, give feedback and make complaints about the standard of services Wesley College and its staff provide.
- Having a child-focused, accessible and responsive complaints system.
- Removing any possible barriers to making a complaint and ensuring
- Applying our responsibility to report child abuse concerns to **child protection** services.
- Applying positive practice expectations that uphold appropriate professional boundaries.

- Being inclusive, providing equity and valuing diversity.
- Being legally compliant and, where possible, exceeding these requirements with child safety best practices.
- Upholding our safeguarding culture and helping to safeguard everyone.

4. CORE SAFEGUARDING PRINCIPLES

This Complaints Policy and our Complaints Procedures have been developed through a child-rights lens, working towards ensuring a positive complaints culture is in place so that all students and whaanau feel supported and empowered to raise concerns and complaints.

Our complaints procedures expand further on the below core safeguarding principles:

- Student-Focused Complaints System
- Accessible complaints management systems
- A Responsive Complaints System
- Managing Risks to Students
- Confidentiality and Privacy
- Levels of Complaint Handling
- Continuous Improvement

5. LEGISLATION AND GUIDANCE

Under the [United Nations Convention on the Rights of the Child 1989 \(UNCRC\)](#) and the [Human Rights Act 1993](#), all people have the right to safety and protection from risks of harm, abuse and neglect. Students also have the same rights to privacy, anonymity and confidentiality as adults (subject to child protection and police reporting obligations).

At Wesley College, we take the implementation and advocacy of these rights seriously and comply with all internal reporting requirements, reportable conduct regulatory requirements and external child protection reporting requirements or expectations. We seek to demonstrate child safety best practices by applying the globally recognised Australian [10 Child Safe Organisation Principles](#). However, we do so in a manner that is tailored to Aotearoa and incorporates the recommendations from [New Zealand \(NZ\) Abuse in Care Royal Commission of Inquiry, final report - Whanaketia – Through Pain and Trauma, from Darkness to Light](#) (July 2024).

However, our practices are also informed by various New Zealand and International Acts noted below and expanded further in **Section 1 of our Complaints Procedures**.

- | | |
|---|--|
| ▪ Australian 10 CSO Principles | ▪ Family Violence Act 2018 |
| ▪ Crimes (Child Exploitation Offences) Amendment Act 2023 | ▪ Harmful Digital Communication Act 2015 |
| ▪ Crimes Act 1961 | ▪ Health and Disability Services (Safety) Act 2001 |
| ▪ Education (Hostels) Regulations 2005 | ▪ Health and Safety at Work Act 2015 |
| ▪ Education and Training Act 2020 | ▪ Oranga Tamariki Act 1989 |
| ▪ Education and Training Amendment Act 2023 | ▪ Te Tiriti o Waitangi / Treaty of Waitangi |
| ▪ Employment Relations Act 2000 | ▪ The Privacy Act 2020 |
| | ▪ The Teaching Council Rules 2016 |

6. DIVERSITY, EQUALITY AND INCLUSION

As noted in the International [Human Rights Act 1993](#) and the [United Nations Convention on the Rights of the Child 1989 \(UNCRC\)](#), all staff are to protect the well-being of all students regardless of ethnicity, age, gender and background. The College asserts that all students have equal rights to protection from abuse and exploitation regardless of their gender, race, religion, political beliefs, age, physical or mental health, sexual orientation, family and social background, and culture or economic status.

We expect all staff to demonstrate inclusivity, provide equity, embrace diversity and ensure our operations and practices uphold **cultural safeguarding**. Being a child safe school also means ensuring students are culturally safe. While cultural safeguarding promotes the positive recognition and celebration of cultures, it is more than just the absence of racism or discrimination; it is more about cultural awareness and cultural sensitivity. A culturally safe environment is socially and emotionally safe, as well as physically safe for children and young people. It is underpinned by shared respect, shared meaning, shared knowledge and experience, and living and working together with dignity and truly listening.³

7. STUDENT EMPOWERMENT AND PARTICIPATION

This Complaints Policy and Procedures have been developed with the engagement and participation of students and whaanau. We are committed to ensuring that all complaints that indicate misconduct concerning child safety, non-compliance with child safety policies, child abuse and/or concerns, suspicions or allegations related to child abuse are reported to our Leadership and, where applicable, child protection services and our Board. **See Section 2 of our Complaint Procedures for more information.**

8. STAFF ROLES AND RESPONSIBILITIES

All Wesley College staff are responsible for:

- Understanding and complying with our complaint handling processes.
- Helping people make a complaint and receiving complaints as per this Complaints Policy and our Complaints Procedures.
- Where applicable, escalating complaints as per the complaint's level and the identified escalation lines.
- Ensuring all complaint data is recorded.

However, as detailed in our complaints procedures, some staff do hold specific responsibilities in accordance with this policy.

See Section 3 of our Complaint Procedures for more information.

8.1 Induction, Training and Education

Our child safety induction, training and education strategy, and annual child safety training programme drive our staff's child safety professional development requirements. This includes mandatory child safety induction, training and refresher training. Formal and informal training is also provided to all staff to ensure they are aware of how to assess and manage the level of a complaint.

See our [Child Safety Induction, Training and Education Strategy and Training Programme](#) for more information.

9. STUDENT-FOCUSED COMPLAINTS SYSTEM

Wesley College is committed to upholding children's rights in policy, practice, and culture. In line with these commitments, as stated, our complaints policy and procedures have been developed through a child-rights lens, working towards ensuring a positive complaints culture so that all students and their whaanau feel supported and empowered to raise concerns and complaints.

³ Revised from An Overview of the Victorian Child Safe Standards (November 2015) -State of Victoria, Department of Health and Human Services and A Guide for Creating a Child Safe Organisation (Version 2.0 December 2015)- Commission for Children and Young People

All complaints are taken seriously, emphasising the fair, efficient, transparent, and objective management of all complaints.

In developing this policy and its related procedure and tools, the College has worked with students and whaanau to ensure the policy and process are fit for purpose, inclusive and remove or reduce the barriers to making complaints.

We also recognise that a complaints management system prioritising students' rights, safety, and well-being cannot exist in isolation and must form a part of the school's overarching student safeguarding culture, where student, whaanau and staff voices are listened to, valued, and welcomed.

9.1 Recognising Possible Barriers to Making Complaints

Wesley College recognises there can be any number of reasons that a student and/or their whaanau/ may be reluctant to make a complaint. These reasons may include, but are not limited to:

- Feeling isolated from support systems, including whaanau, friends and community.
- Feeling worried about being sent home or getting in trouble.
- Imbalance of power, particularly with the College as the provider.
- Lack of awareness and knowledge about the complaints system.
- Being told by the College, whaanau or others not to complain.
- Worried about confidentiality.
- Worried that the repercussions may outweigh the benefit of disclosure.
- Worried about whaanau and/or friends finding out about the complaint.
- Lack of awareness around students' rights, appropriate behaviours and what to expect from adults and students they live and work with.
- Complaints processes are not being presented in culturally safe ways.
- Staff not demonstrating cultural safety and sensitivity in engagement with students and whaanau.
- Embarrassed or ashamed, particularly if the issue of concern could amount to a breach of rules.
- Previous negative experiences when making a complaint.

9.2 Addressing Barriers to Making Complaints

To reduce the barriers for students and whaanau to make a complaint, the complaints management process has been designed to be accessible and responsive to students' and whaanau needs. The College will ensure that anyone who wishes to make a complaint, including staff, are treated fairly and respectfully, focusing on responsive, efficient, and transparent complaint-handling practices.

To address barriers that may arise in making a complaint or the response process, Wesley College will:

- Endeavour to ensure that anyone making a complaint does not suffer adverse consequences from making that complaint, including reprisals or loss in line with other College policies and reporting obligations.
- Ensure all students and whaanau can engage in the Complaints Management Process. The College will always seek to make reasonable adjustments to the process to minimise any potential barriers to making a complaint.
- Ensure that all complainants have access to a support person when making a complaint.
- Communicate the importance of complaints and feedback as a positive aspect of Wesley College's learning culture, where students and whaanau are experts in their own experiences with invaluable contributions to the College's administration.
- Implementing strict confidentiality as outlined in this policy.
- Ensure students and whaanau are aware of the appropriate standards of conduct for Wesley College and its staff, including sharing student and whaanau friendly policies (e.g., Staff Safeguarding Code of Conduct).
- Offer all complainants the opportunity to have their complaint outcome reviewed and/or identify

external pathways where the complaint can be taken.

- Provide staff with training to ensure responses to complaints are respectful, fair and culturally safe.
- Accept and work to investigate anonymous complaints to the extent possible with the information provided.
- Build a school culture that focuses on equity and celebrates the diversity of our school community.

10. MAKING A COMPLAINT / ACCESSIBLE COMPLAINT MANAGEMENT SYSTEMS

Wesley College is committed to making the complaints system accessible to all students, whaanau and staff and providing various pathways and information about how to make a complaint. This includes but is not exclusive to:

- Talking to a staff member.
- Via Stymie (student only).
- Via email feedbackandcomplaints@wesley.school.nz or the phone [09 2370224](tel:092370224).
- Via our [website](#) feedback and complaint resources.
- Via our [complaint form](#).

We seek to ensure that any student and their whaanau and staff:

- Are provided information about our complaint handling process in easy-to-understand language.
- Can see information/signage on our complaints process around College environments.
- Have complaint information and resources integrated into their handbooks, resources, etc.
- Have multiple, accessible pathways to make complaints, including student-friendly complaint forms and explanations of the policy and related process.
- Where identified, are provided with a translator for the complainant or other relevant party.
- Able to include a support person in the complaints process.

10.1 Our Complaints Management Process



See Section 5 of our Complaint Procedures for our Complaints Management System.

11. ACKNOWLEDGING AND RESPONDING TO COMPLAINTS

We are committed to ensuring all complaints are responded to as quickly as possible, including at the initial receipt of a complaint. Wesley College seeks to ensure that anybody who makes a complaint:

- Wherever possible, have their complaints resolved at first contact with us, and when appropriate, we may offer an explanation or apology to the person making the complaint at that time.
- Receive an acknowledgement of receipt of the complaint within 2 business days (and no later than 5 business days) following receipt of the complaint (this includes any complaints that have not been able to resolve the matter at first contact).
- Be informed as to how they will/can be involved in the process and estimated time frames for resolution.
- Be listened to and treated with respect by staff and actively engaged in the process where possible and appropriate.
- Have any conflicts of interest, actual or perceived, managed responsibly. This includes ensuring their complaint addressed in an unbiased manner, and the person handling a complaint is different from any staff member who may be the subject of or associated to the complaint.
- Be communicated with and given updates in line with confidentiality and privacy requirements throughout the process.
- Be provided with reasons for complaint outcomes and decisions, as well as any options for review or, where applicable, redress.

See Section 5 of our Complaint Procedures for Receiving A Complaint and Section 6 for our Complaint Record Form.

12. MANAGING COMPLAINTS

Wesley College will:

- Aim to manage and resolve complaints upon initial receipt as efficiently and directly as possible in the first instance.
- Endeavour to ensure that anyone making a complaint does not suffer adverse consequences from making that complaint.
- Implement strict confidentiality as outlined in this policy and our complaint procedures.
- Offer all complainants the opportunity to have their complaint outcome reviewed and/or identify external pathways where the complaint can be taken.
- Accept and work to investigate anonymous complaints to the extent possible with the information provided.
- If a complaint involves multiple organisations, we will work with other organisations where possible. We will ensure that communication with the complainant (or their representative) is clear and coordinated and that, subject to privacy and confidential considerations, communication and information sharing between the parties will be organised to facilitate a child-centred, timely response.

See Section 7 of our Complaint Procedures for Acknowledging a Complaint.

13. LEVELS OF COMPLAINT HANDLING

In assessing complaints, the College will ensure all complaints are evaluated to understand any existing or potential risks raised in the complaint (directly or indirectly).

We understand that complaints may be an avenue for identifying safeguarding risks or issues with current risk management processes. An investigation or an assessment of a complaint includes reviewing systemic and/or environmental issues that may have contributed to incidents or issues identified in a complaint and where applicable our safeguarding and child protection procedures.

All staff receive training (formal and informal) to ensure they are aware of how to manage and assess the level of complaints.

Level 3	Where complaints cannot be resolved at Level 2 or where the complaint is of a very serious nature, they will be escalated to Level 3. Any concern or suspicion that a complaint involves a potential or actual child protection issue must be immediately categorised as a Level 3 complaint.	The Principal Deputy Principal Head of Boarding Safeguarding Officer
Level 2	Where complaints cannot be resolved on first contact and/or present staff with particular complexity, potential systemic or serious issues, those complaints can be escalated to the appropriate Senior Leadership staff member, who will seek to resolve the complaint.	Applicable Senior Leadership
Level 1	Wesley College recognises that the most efficient and effective way to resolve complaints and/or feedback is to deal with them at initial receipt.	All staff

See Section 8 of our Complaint Procedures for Assessing a Complaint, Section 9 for Addressing a Complaint and Section 10 for Investigating and Resolving a Complaint.

14. CONFIDENTIALITY AND PRIVACY

Personal or sensitive information held by the College is protected under the Privacy Act 2020. Confidentiality also extends to any documentation being shared upholding privacy rights by redacting or removing material that would breach the privacy rights of other persons.

Privacy Act 2020 – Principle 11 – Disclosure of Personal Information

Principle 11 states that an organisation may only disclose personal information in limited circumstances. This includes when a disclosure is necessary to avoid endangering someone's health or safety.

In accordance with Principle 11 of the Privacy Act 2020, our Safeguarding and Child Protection Policy and our safeguarding culture, we are expected to share relevant information related to known or suspected child abuse. The College will aim to share this information with consent when doing so does not permit or increase any safety risks to any person(s) or any potential investigation.

We recognise that children and young people have the same right to privacy, anonymity and confidentiality as adults (subject to child protection and police reporting obligations). However, absolute confidentiality cannot be assured due to reporting obligations and procedural fairness in investigations.

Therefore, complaints will be kept confidential to the extent possible, consistent with Wesley College's reporting requirements and the need to conduct investigations aligned with New Zealand legislation and College policies.

Internal dialogue about complaints will be on a 'need to know' basis, and all involved must hold any such information in the strictest confidence. Any breaches of confidentiality will be treated seriously, and disciplinary action will be taken in such circumstances, in line with the Disciplinary Referral Policy (4a).

See Section 11 of our Complaint Procedures for more information.

15. POLICY EXCEPTIONS

Wesley College is committed to being accessible and responsive to all people who approach us with feedback or complaints. However, we remain mindful to:

- The health, safety and security of students and our staff.
- Our ability to allocate our resources fairly across any complaints received and adhere to ongoing commitments.

Therefore, if in their dealings with us, a person behaves in a manner deemed to be unreasonable and/or that questions the well-being and safety of others, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

See Section 12 of our Complaint Procedures for information on Closing a Complaint and Section 13 for Record Keeping.

16. CONTINUOUS IMPROVEMENT

Wesley College is committed to continuous improvement across student safety and experiences and will analyse and utilise complaints to ensure the continuous improvement of the College's complaint system and overall child safe culture.

We seek to ensure continuous improvement in the following ways:

- Analyse complaints to check that relevant policies and processes are being followed, are relevant and fit for purpose.
- Analyse complaints to assess identified timeframes for resolution are being met.
- Analyse complaints about trends and risks across Wesley College.
- Provide positive feedback to staff who appropriately apply the complaints process.
- Involve students in the review of the complaint system.

See Section 14 of our Complaint Procedures for more information.

17. POLICY MONITORING AND REVIEW

Per our **Policy Review Schedule**, which monitors and drives compliance with our policy review expectations, this Complaints Policy is reviewed every 2 years alongside our Safeguarding and Child Protection Policy.

The review process seeks to ensure continued compliance with legislation, other College policies and practices, stakeholder feedback, and current best practices regarding child safeguarding.

Circumstances that may trigger an earlier or additional review include, but are not limited to, legislative changes, organisational changes, incident/case learnings, etc. All student and whaanau consultation data, case learnings, and sector developments are also utilised to inform our policy and procedural reviews and our continuous improvement.

We communicate any policy and procedural updates via the implementation and dissemination elements noted in our Policy Review Schedule. These may include staff briefings, staff management meetings, staff training, organisational signage, and communication resources, e.g. the College website, newsletters, social media, etc.

