



Last Review	November 2021
Next Review	November 2023
Approval	December 2021
Effective Date	1 January 2022

1. Statement of Commitment

Dilworth School is committed to providing a safe, caring and nurturing environment and school climate to ensure the wellbeing and prevent the harm of tamariki, rangatahi, their whānau/family and staff. This is our single greatest priority and responsibility.

- Dilworth is alert to potential child safety risks and takes immediate action when issues are identified.
- There is zero tolerance for abuse of any kind.
- All stakeholders are to report any child safety allegations, disclosures or concerns.
- All staff must adhere to and abide by the Student Safety Code of Conduct.
- We seek, value and respect diverse representation, views and experiences in tamariki/rangatahi and encourage individuality and choice.
- Tamariki/Rangatahi are empowered and encouraged to speak up and speak out.
- All services adhere to child rights principles of partnership, protection and participation; and the rights and responsibilities accorded by Te Tiriti o Waitangi.

The full version of our Statement of Commitment to Child Safety can be viewed on our website.

2. Purpose

Dilworth recognises that all Dilworth students and whānau/families have a right to express their views, give feedback and make complaints about the standard of services provided by Dilworth and its staff and volunteers.

This policy has been developed to ensure students and whānau/families have access to a complaint system that promotes their rights and prioritises the safety and wellbeing of Dilworth students.

This policy establishes and articulates Dilworth's complaint management approach. It is designed to ensure that staff can be informed about what is expected of them if a student or student's family contacts them regarding making a complaint. In addition, the complaint policy is communicated to students and students' whānau/families to ensure that they know how to make a complaint and what to expect from Dilworth's complaint management process.

3. Core Safeguarding Principles

3.1 Student-Focused Complaints System

Dilworth is committed to upholding the United Nations Convention on the Rights of the Child, of which New Zealand is a signatory. Dilworth is committed to embedding children's rights into policy practice and culture. In line with these commitments, the complaints policy and process have developed

through a child-rights lens, working towards ensuring a positive complaints culture is in place so that all students and their families feel supported and empowered to raise concerns and complaints.

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, Dilworth has worked with students and families to ensure the policy and process are fit for purpose, inclusive and remove or reduce the barriers to making complaints.

Dilworth also recognises that a complaints management system prioritising students' rights, safety, and wellbeing cannot exist in isolation and must form a part of the school's overarching student safeguarding culture, where student and whānau/families voice are listened to, valued, and welcomed.

3.2 Recognising and Addressing Barriers to Making Complaints

Dilworth recognises that there may be any number of reasons that a student and/or whānau/families may be reluctant to make a complaint. These reasons may include, but are not limited to:

- Feeling isolated from support systems, including whānau/families, friends and community.
- Feeling worried about being sent home or getting in trouble.
- Imbalance of power, particularly with Dilworth as the provider of the scholarship.
- Lack of awareness and knowledge about the complaints system.
- Being told by the school, whānau/families or via other channels not to complain.
- Worried about confidentiality.
- Worried that the repercussions may outweigh the benefit of disclosure.
- Worried about whānau/families and/or friends finding out about the complaint.
- Lack of awareness around students' rights, appropriate behaviours and what to expect from adults and students that 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 whānau/families.
- Embarrassed or ashamed, particularly if the issue of concern could amount to a breach of rules, resulting in loss of scholarship
- Previous negative experiences when making a complaint

To reduce the barriers for students and whānau/families to make a complaint, the complaints management process has been designed to be accessible and responsive to students and whānau/families needs. Dilworth will ensure that anyone who wishes to make a complaint is treated fairly and respectfully, focusing on responsive, efficient, and transparent complaint handling practice.

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

- Endeavour to ensure that anyone making a complaint does not suffer adverse consequences from making that complaint, including reprisals or loss of a scholarship, in line with other Dilworth policies and reporting obligations.
- Ensure all students and whānau/families can engage in the Complaints Management Process. Dilworth 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 complainant.
- Communicate the importance of complaints and feedback as a positive aspect of Dilworth's learning culture, where students and whānau/families are experts in their own experiences with invaluable contributions to the school's administration.
- Implementing strict confidentiality as outlined in this policy.
- Ensure students and whānau/families are aware of the appropriate standards of conduct for Dilworth and its staff, including sharing student and whānau/families friendly policies (e.g. Safeguarding Code of Conduct for Staff (5o).

- 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.

3.3 Accessible complaints management systems

Dilworth is committed to making the complaints system accessible to all students and whānau/families. Dilworth is committed to providing varied pathways and information about how to make a complaint including via:

- The Dilworth website.
- Personal interaction with staff members.
- Display the complaints process around campuses.
- Handbooks provided to students and whānau/families.

The following complaints pathways are available to students and their whānau/families:

- Via email (feedbackandcomplaints@dilworth.school.nz)
- Via post (Complaints, Dilworth School, Private Bag 28-904, Remuera 1541, Auckland)
- Via telephone (phone 09 5231060)
- Via Stymie (student only).
- Via the Dilworth website *Feedback and Complaints*
- Via the complaints forms located next to the locked boxes in boarding houses
- Using the Dilworth Complaints Form
- Using the [Dilworth Complaint Google Form](#)

Dilworth seeks to ensure that any student and their whānau/families are:

- Provided with information about our complaint handling process in easy-to-understand language.
- Provided with multiple, accessible pathways to make complaints, including student-friendly complaint forms and explanations of the policy and related process.
- Where identified, provide a translator to the complainant or other relevant party.
- Able to include a support person in the complaints process.

3.4 Responsive Complaints System

Dilworth is committed to ensuring all complaints are responded to as quickly as possible, including at the initial receipt of a complaint. Dilworth seeks to ensure that any student and their whānau/families who make a complaint are:

- Acknowledged within 2 business days (and no later than 5 business days) following receipt of the complaint
- Informed as to how they will be involved in the process and estimated time frames for resolution
- Listened to, treated with respect by Dilworth staff and actively engaged in the process where possible and appropriate
- Communicated with and given updates in line with confidentiality and privacy requirements throughout the process
- Provided with reasons for complaint outcomes and decisions, as well as any options for redress or review

3.5 Managing Risks to Dilworth Students

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

Dilworth understands that safeguarding risk management is an ongoing process and that complaints may function as an avenue for identifying 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.

3.6 Confidentiality and Privacy

Dilworth recognises 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 Dilworth’s reporting requirements and the need to conduct investigations aligned with New Zealand legislation and Dilworth policy.

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

3.7 Levels of Complaint Handling

Dilworth will always aim to manage and resolve complaints upon initial receipt, as efficiently and directly as possible in the first instance.

Complaints are managed along the following levels:

Level 3	<p>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.</p> <p>Any concern or suspicion that a complaint involves a potential or actual child safeguarding issue must be immediately categorised as a Level 3 complaint.</p>	<p>Headmaster</p> <p>Director of Student Services</p> <p>Director of Human Resources</p> <p>Safeguarding Officer</p>
Level 2	<p>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 Manager, who will seek to resolve the complaint.</p>	<p>Director of Student Services</p> <p>Head(s) of Campus</p> <p>Director of Boarding</p> <p>Director of Human Resources</p>
Level 1	<p>Dilworth recognises that the most efficient and effective way to resolve complaints and/or feedback is to deal with them at initial receipt.</p>	<p>All staff</p>

Any concern or suspicion that a complaint involves a potential or actual child safeguarding issue must be immediately categorised as a Level 3 complaint.

Training (formal and informal) is provided to all staff to ensure they are aware of how to manage and assess the level of complaints.

3.8 Continuous Improvement

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

Dilworth seeks 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 for trends and risks across Dilworth
- Provide positive feedback to staff who appropriately apply the complaints process
- Involve students in the review of the complaint system

4. Policy

This policy applies to Dilworth Trust Board, staff and contractors (or volunteers), who may receive a complaint from a student and/or whānau/families involved in, or otherwise in connection with the school.

The policy also applies to all students and the whānau/families of students who wish to make a complaint about Dilworth's services or staff.

Complaints can be made to Dilworth about:

- Any aspect of the services Dilworth provides, including the services of Isabella Dilworth Lodge
- Any practice, policy or procedure
- Staff behaviour or conduct
- Any decision made about service changes, enrolment or learning support

Dilworth is committed to ensuring all policies and related procedures are up to date, and fit-for-purpose. Dilworth will review the Complaints Policy and associated procedures annually to ensure it remains up to date with current research, legislation, and contemporary views on best practice. Dilworth seeks to involve the views of Dilworth staff, students, and whānau/families in the review process through surveys, consultation with small groups of students and parents/caregivers in Dilworth Family Connect and parent advisory groups.

Other events that might trigger a review include but are not limited to low numbers of complaints or feedback being directed to the school, non-compliance, or false complaint handling processes.

Dilworth will ensure that all relevant updates or policy changes are communicated to the broader Dilworth school community.

5. Roles and Responsibilities

The Trust Board is responsible for:

- Ensuring systems and structures are in place within the school to implement and monitor the effectiveness of the Complaint Management Policy.
- Monitoring the effectiveness of complaints handling processes via reports from the Headmaster.
- Overseeing complaints handling where complaints are escalated to Board level.
- Responding to and overseeing complaints made about or referring to the Headmaster.

The Headmaster is responsible for:

- Ensuring the Complaints Management Policy is implemented and is operating across the school.
- Receiving and responding to complaints in line with the Complaints Management Policy.
- Monitoring and ensuring all reporting requirements are met as outlined in Child Abuse Prevention and Response Protocols.
- Reporting complaint trends and information to the Board.

The Child Safeguarding Officer is responsible for:

- Maintaining oversight of child safeguarding related complaints.
- Ensuring any child safeguarding related complaints are responded to as outlined in the Child Abuse Prevention and Response Protocols
- Receiving and responding to complaints in line with the Complaints Management Policy.

The Director of Student Services is responsible for:

- Receiving and responding to complaints in line with the Complaints Management Policy
- Following the complaints management process as outlined in this policy
- Ensuring any child safeguarding complaints are responded to as outlined in the Child Abuse Prevention and Response Protocol
- Ensuring that the complaints policy and pathways to complaints are communicated with Dilworth students and whānau/families
- Overseeing the management of the Complaint Register
- Overseeing the management of Stymie complaints and concerns
- Overseeing continuous improvement of the Complaints Policy

All staff are responsible for:

- Receiving complaints in line with the Complaints Management Policy
- Following the Complaints Management Process as outlined in this policy
- Escalating complaints in line with the complaint level and identified escalation lines
- Ensuring any child safeguarding complaints are responded to as outlined in the Child Abuse Prevention and Response Protocol

6. Definitions

Classified Information: Dilworth recognises 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 Dilworth's reporting requirements and the need to conduct investigations aligned with New Zealand legislation and Dilworth policy.

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

Complaint: refers to any matter ranging from a general expression of dissatisfaction with a service provided by Dilworth to a particular experience with a person or persons involved with Dilworth to an allegation of misconduct, policy non-compliance, abuse or exploitation, to an issue with the complaints management process¹.

Complainant: refers to the person raising the complaint.

Subject of the complaint: the person whose conduct is the focus of a complaint.

Safeguarding Complaint: any complaint that indicates or refers to:

- misconduct in relation to student safety,
- non-compliance with safeguarding policies,
- child abuse
- a belief(s), concern(s), suspicion(s) or allegation(s) related to child safeguarding misconduct/non-compliance
- a belief(s), concern(s), suspicion(s) or allegation(s) related to child abuse

Annex 1 includes the broad range of definitions related to the Complaints Management Policy and Process.

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

Annex 1: Policy Definitions

- **Child (tamariki)** – any person under the age of 18.
- **Child Safe** – refers to an organisational 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 wellbeing of children. A child safe environment ensures that children and young people are **culturally safe**.
- **Child Abuse:** An act(s) or omission which endangers a child’s health, wellbeing and/or development.
- **Child Protection** – usually refers to a statutory authority responsible for investigating and responding to reports of child abuse in the community.
- **Code of Conduct** – a policy which specifies behaviours expected of all employees, volunteers, contractors and directors in the organisation.
- **Complaint:** refers to any matter ranging from a general expression of dissatisfaction with a service provided by Dilworth, to particular experience with a person or persons involved with Dilworth, to an allegation of misconduct, policy non-compliance abuse or exploitation, to an issue with the complaints management process.²
- **Cultural Safety** – 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 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
- **Culturally and/or Linguistically Diverse Background (CaLD)** – identification with particular cultural or linguistic affiliations by virtue of place of birth, ancestry or ethnic origin, religion, preferred language or language spoken at home or because of parents’ identification on a similar basis.
- **Misconduct** – behaviours that breach Dilworth’s code of conduct(s), or other policy relating to acceptable standards of behaviour.
- **Oranga Tamariki** - the statutory authority responsible for receiving and investigating reports of child abuse.
- **Procedural fairness:** refers to acting fairly in decision making process related to a complaint
- **Staff** – refers to any individual employed by Dilworth
- **Student** – refers to any person currently enrolled at Dilworth school.
- **Safeguarding Complaint:** any complaint that indicates:
 - misconduct in relation to student safety,
 - non-compliance with safeguarding policies,
 - child abuse
 - a belief(s), concern(s), suspicion(s) or allegation(s) related to child safeguarding misconduct/non-compliance
 - a belief(s), concern(s), suspicion(s) or allegation(s) related to child abuse

Subject of a complaint: the person or persons whose conduct is the focus of a complaint.

² Adapted from *Complaint Handling Guide: Upholding the rights of children and young people* (2019), Commonwealth of Australia, Department of the Prime Minister and Cabinet

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