



Child-Focused Complaints Procedure

PROCEDURE NO.

CS 0028-01

1. Purpose

1.1 To provide a child-centered, culturally safe, trauma-informed and procedurally fair process for receiving, acknowledging, assessing, investigating and resolving complaints made by a child or on behalf of a child or young person.

1.2 Complaints are opportunities to improve services and strengthen child safety, wellbeing and trust, and to help children and young people feel heard, respected and taken seriously.

2.Scope

2.1 This procedure applies to complaints made by a child or young person, or by a parent, carer, advocate, family member or trusted person supporting them, where the complaint relates to a Council service, activity, program, facility, event, worker, volunteer, contractor or other Council-connected environment involving children and young people.

2.2 Complaints from adults that are not made by or on behalf of a child should be managed under the Council's general complaints process unless the matter also raises a child safety concern.

2.3 Where a complaint involves alleged harm, abuse, reportable conduct or criminal behaviour, Council will also respond under the Child Safe Reporting Policy and Procedure and any applicable external reporting obligations.

3. Definitions

For the purpose of this procedure:

3.1 Advocate: a person nominated by the child to support or act on their behalf, where appropriate.

3.2 Child: any person under 18 years. In Queensland, a child is legally defined as an individual under 18 years of age. However, specific legal ages for activities may vary: E.g. 10 for criminal responsibility, 18 for buying alcohol. The legal age for consent for having sex in Queensland is 16.

3.3 Child safe complaint: means any concern, allegation, suspicion, disclosure, complaint, incident, behaviour, practice or environmental issue that may affect the safety or wellbeing of a child or young person.

3.4 Child Safe Lead: the Council's nominated officer responsible for advising on child safety complaints, reporting pathways, escalation and support under the child safe framework.

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3.5 Council personnel / workers: means the persons listed in the scope section of this procedure.

Includes all council staff, representatives, members, managers, directors, volunteers, contractors, work experience students, apprentices, trainees, third-party providers, workers for hire (e.g. event staff).

This also includes all workers and personnel associated with council services, programs, facilities, land, events, workers, volunteers, contractors, labour-hire personnel, trainees, students, placement workers, facility hirers, tenants, lessees, user groups, event organisers and other third parties (all personnel and council related programs/activities and facilities).

3.6 Complaint: expression of dissatisfaction where a response is expected (AS/NZS 10002:2022 aligned).

3.7 Complaint made on behalf of a child: a complaint raised by a parent, carer, advocate, family member or trusted person in the interests of a child or young person.

3.8 Harm: includes physical harm, psychological or emotional harm, sexual abuse, neglect, exploitation, grooming, exposure to family violence, inappropriate conduct, and any other conduct or circumstance that places a child at risk.

3.9 Mandatory reporting: legal obligations under Queensland law requiring certain roles to report suspected child abuse or harm in specified circumstances.

3.10 Reportable conduct: as defined by the *Child Safe Organisations Act 2024* (Qld).

4. Commitments to Child Safety, Rights and Participation

4.1 Council aligns with the Queensland Child Safe Standards, the National Principles for Child Safe Organisations and the Universal Principle of Cultural Safety so that Aboriginal and Torres Strait Islander children are culturally safe and their cultural rights, identities and connection to family, community and Country are recognised and respected.

4.2 Children are informed of their rights, involved in decisions, and taken seriously. Council aims to ensure children and young people feel welcome, safe, valued, included and respected. Families and communities are engaged where safe and appropriate. Complaints inform continuous improvement and risk management.

5. Trauma-Informed Complaint Handling

5.1 Council will:

- provide safe, appropriate, child-friendly spaces;

- allow/expect the child to choose support (trusted adult, advocate, First Nations liaison, interpreter);
- explain the process in age-appropriate language and check understanding;
- minimise repetition; allow breaks; respect the child's pace; and
- recognise cultural, disability-related and linguistic needs.

5.2 Council will provide child-friendly information sheets or other accessible resources explaining the complaints process for children and young people.

6. Natural Justice and Procedural Fairness

6.1 Decision-makers must be impartial and free from actual or perceived conflicts of interest.

6.2 Relevant facts and issues should be shared with the child and/or their advocate, in a way that is age-appropriate and accessible, so they have a fair opportunity to respond before decisions are made, unless there is a safety, privacy or legal reason limiting what can be shared.

6.3 Reasons for decisions should be clearly explained in age-appropriate and accessible language.

7. Making a Complaint

7.1 Who can complain:

A complaint may be made by:

- any child or young person using, participating in, or affected by a Council service, activity, facility, event or other Council-connected environment;
- an advocate acting for a child or young person, with consent where appropriate; or
- a parent, carer, family member or trusted person supporting the child or young person.

7.2 How to complain:

7.2.1 A complaint can be made in the way that feels safest and easiest for the child or person supporting them. This may include:

- a Council feedback form;
- a Council email address or online complaints form;
- a letter;
- speaking face-to-face with a Council worker;
- contacting the nominated Child Safe Lead by phone; or
- another communication method that meets the child's needs.

7.2.2 Anonymous complaints are accepted and will be assessed to the extent possible.

7.2.3 Children and young people may request culturally appropriate support persons, including Aboriginal and Torres Strait Islander liaison support where available.

7.3 Accessibility: Council will provide Easy Read, visual supports, AAC, Auslan/interpreters, bilingual support and other disability-related or communication adjustments as needed.

8. Acknowledgement and Timeframes

8.1 Written complaints should be acknowledged promptly, ideally within 24 hours.

8.2 Verbal complaints should be acknowledged at the time they are made.

8.3 Council will aim to resolve complaints within 10 business days.

8.4 If the matter is complex, involves external reporting, or requires more time, the child, young person or their support person will be given regular progress updates, at least every 10 business days until the matter is finalised.

9. Assessment of Complaints

The Child Safe Lead conducts an initial assessment to:

- clarify the issues raised;
- identify any immediate or ongoing risks to the child or others;
- consider power imbalances;
- ask the child, where appropriate, how they would like the complaint to be resolved;
- consider cultural, trauma-related, safety, communication and accessibility needs;
- determine whether investigation is required and the expected timeframe; and
- determine whether the matter also raises a child safety concern requiring escalation under the Child Safe Reporting Policy and Procedure.

10. Investigation

10.1 Investigations must be impartial, confidential, transparent, timely and documented.

10.2 Any person who is the subject of a complaint must not conduct or influence the investigation. Depending on the nature of the complaint, the investigator may be the line manager, nominated Child Safe Lead, senior manager or another appropriately authorised person. Human resources and/or external advice from relevant parties, may be sought where relevant.

10.2.1 Council can use appropriate third parties to manage the complaints process, if this is in the best interest of the child and/or the complaint involves a council worker. The process of managing the complaint needs to be shared explicitly with the child and caregiver of the child.

10.3 If the complaint indicates potential criminal conduct, reportable conduct or another serious child safety concern, Council must follow the Child Safe Reporting Policy and Procedure and make any required external notifications before taking action that could compromise an external response.

11. Recording and Documentation

11.1 Record all complaints, including verbal complaints, in the Council's approved secure recordkeeping system within two business days.

11.2 Records should include the lodged form (as applicable), correspondence, relevant evidence, interview records, file notes, actions taken and outcomes. For complaints/allegations related directly to harm, risk of harm including sexual harm and/or grooming, the Mandatory Reporting Incident Form must be completed.

11.3 Apply role-based access controls and follow retention and disposal requirements in the Records Management Policy and against applicable legislation.

12. Resolution

12.1 The responsible manager will work with the child, young person and/or complainant towards an appropriate resolution.

12.2 Outcomes must be communicated in age-appropriate and accessible formats and should include:

- the outcome and any actions taken
- the reasons for decisions, where appropriate
- any improvements or follow-up actions arising from the complaint.

12.3 All final documentation must be saved in the Council's approved recordkeeping system.

13. Appeals and Escalation

13.1 If a complaint is not resolved, it may be escalated to a more senior manager or other nominated Council decision-maker for further review. Children, young people and their support person should be told how to request a further review and who will consider it.

13.2 Where a complaint involves alleged worker misconduct relating to a child, Council must also assess whether the matter needs to be managed under the Child Safe Reporting Policy and Procedure, including any applicable reportable conduct obligations.

14. External Complaints Options

14.1 Depending on the Council service area, complaint type or regulatory setting, external complaint avenues may also be available. These may include:

- **The Queensland Ombudsman:** If a child, parent, or advocate believes the Council's internal handling or investigation of their complaint was unfair, delayed, or procedurally flawed. The Ombudsman reviews the fairness of Council's administrative processes rather than the conduct of individual workers.
- **Early Childhood Education and Care (ECEC), Queensland Department of Education:** If a complaint or safety concern relates to Council-operated early childhood or childcare services (such as the Curry Kids service) and involves non-compliance with the Education and Care Services National Law or National Quality Standard.
- **The Queensland Human Rights Commission (QHRC):** If a complainant alleges that a Council service, policy, or complaint resolution has breached a child's or family's protected rights under the *Human Rights Act 2019* (Qld).

14.2 Children, young people and their support person should be told about any relevant external complaint option in an accessible and age-appropriate way.

15. Reporting Pathways (when a complaint raises safety/criminal issues)

15.1 Where a complaint raises concerns about immediate danger, abuse, neglect, criminal conduct, serious child safety risk or reportable conduct, Council must also respond under the **Child Safe Reporting Policy and Procedure**. This may include reporting to:

- **Queensland Police**
 - Emergency: **000**
 - Non-urgent police matters / Policelink: **131 444**
 - Online reporting: [Queensland Police / Policelink online reporting](#)
- **Department of Child Safety**
 - During business hours: contact the relevant **Regional Intake Service**
 - After hours and weekends: **1800 177 135**
 - Reporting information: [Report child abuse](#)
 - Regional Intake Services: [Regional Intake Services contact list](#)
- **Queensland Family and Child Commission (QFCC)**, where reportable conduct obligations apply
 - General enquiries: **(07) 3900 6000**
 - Reportable Conduct Scheme information: [QFCC Reportable Conduct Scheme](#)

15.2 Staff handling complaints must seek advice from the nominated Child Safe Lead where these pathways may apply.

16. Accessibility, Monitoring, Review and Improvement

16.1 Council will monitor complaints, themes, risks and improvement actions through its nominated governance and reporting processes.

16.2 Complaint information may be reviewed in de-identified form where appropriate to identify patterns, barriers, service issues and child safety improvements.

16.3 Procedures and practice should be reviewed after critical incidents and at regular intervals, including at least biannually.

16.4 This procedure must be adhered to by all council personnel and will be made available electronically.

17. Roles

17.1 Children and young people, and those supporting them can raise complaints safely, choose supports, and receive updates and outcomes in accessible ways.

17.2 Workers support the child or complainant, respond appropriately, lodge or record complaints promptly, and maintain records in accordance with this procedure.

17.3 Child Safe Lead assess complaints, manage immediate risks, ensure communication occurs, determine whether escalation or reporting is required, and close out actions.

17.4 Chief Executive Officer provides system oversight and ensures any applicable reportable conduct obligations are met.

18. Related Documents

18.1 (Internal Documents – Available to the Public)

This Procedure should be read together with related child safe documents, including as applicable:

- Child Safety and Wellbeing Statement of Commitment Policy
- Child Safe Code of Conduct Policy
- Information Privacy Policy
- Records Management Policy

18.2 (Internal Documents – For Council Personnel Use Only)

- Child Safety Risk Management Framework
- Supervision and Duty of Care Procedure
- Child Safe Reporting Policy and Procedure

POLICY VERSION AND REVISION INFORMATION

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1	Council Resolution 121.2026	16.06.2026	June 2028

Policy approved by: Tammy Parry



Title: Chief Executive Officer