

## Complaints and Feedback Policy

### Purpose

ECMS is committed to creating a culture that values reflection, feedback, ensures transparency, and prioritises the safety and wellbeing of children. This policy outlines how ECMS responds to complaints and concerns, with a focus on child safety and compliance with the Victorian Child Safe Standards (Standard 7). This policy aligns with the *Child Safety and Wellbeing Policy* and supports our commitment to ensuring all children feel safe, seen, heard and valued.

### Scope

This policy applies to:

- The Approved Provider, persons with management or control, Centre Director, Nominated Supervisor, and persons in day-to-day charge.
- Early Childhood teachers, educators, staff, contractors, students, volunteers, parents/guardians, children, and others enrolled and participating in ECMS programs and services, including during offsite excursions and activities.
- All ECMS-operated Early Learning Centres and Kindergarten programs.

### Guiding Principles

- **Child-Centred:** All processes prioritise the rights, voice, and safety of children, ensuring they feel safe, seen, heard and valued.
- **Culturally Safe and Inclusive:** Complaints can be made in culturally respectful, accessible ways.
- **Transparent and Fair:** All complaints are taken seriously and handled with procedural fairness.
- **Supportive:** Complainants are offered support, including interpreters, advocates, or staff guidance.
- **Continuous Improvement:** Feedback and complaints are used to identify systemic issues and strengthen practice.

## Definitions

Term	Definition
<b>Complaint</b>	Any expression of dissatisfaction about the service, behaviour, decisions, or actions.
<b>Child-related concern</b>	Any issue raised involving actual or potential harm to a child.

## Making a Complaint

Complaints can be made:

- In person
- Via email or phone
- Through the QR code at service locations
- Through developmentally appropriate, child-friendly mechanisms (e.g. visual prompts, trusted adult conversations)

These mechanisms are aligned with our commitment to child-friendly and culturally safe communication, as outlined in the Child Safe and Wellbeing Policy.

Complaints may be made anonymously. All complaints are treated confidentially and respectfully. ECMS recognise that individuals may feel more comfortable raising concerns anonymously and treats them with the same seriousness as identified complaints. ECMS encourages anyone providing anonymous feedback to include as much information as possible. Without sufficient details, ECMS may be limited in its ability to investigate or respond adequately. All complaints, anonymous or not, are assessed for risk and actioned appropriately, in line with our commitment to child safety and service quality.

## Responding to Complaints

Complaints are assessed and triaged as follows:

- **Child Safety Concern:** Immediate referral to Risk & Compliance. May require notification to CCYP, Child Protection, or Police.
- **Code of Conduct Breach:** Managed in line with disciplinary procedures.
- **Service Feedback:** Addressed at the local level and resolved promptly where possible.

All complaints will be acknowledged within 2 working days and resolved as promptly as possible.

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The way ECMS responds to complaints aligns with the ECMS Child Safeguarding Practice Framework, explicitly shared in the *Child Safety and Wellbeing Policy*.

Complainants will be kept informed throughout the process unless doing so would compromise safety, legal obligations, or privacy. ECMS is committed to closing the loop by communicating outcomes and actions taken to the relevant individuals and groups. Where appropriate, families and team members will be informed of the findings, any changes to prevent recurrence and how feedback has contributed to service improvement. While respecting privacy and confidentiality, ECMS aims to be as transparent as possible in sharing how concerns lead to meaningful outcomes.

### Support for Complainants

ECMS provides trauma-informed, culturally safe and inclusive support to all complainants, tailored to individual needs and circumstances. This may include:

- Assistance from a trusted staff member
- Access to a social worker or psychologist
- Interpreters or translated materials
- External advocacy referrals (e.g. Children and Young People's Commissioner)
- Trauma-informed response for those affected by harm

### Child-Friendly Processes

ECMS is committed to ensuring children:

- Know how to raise concerns and what will happen if they do
- Are supported to participate in ways that are safe and developmentally appropriate
- Can raise issues through trusted staff, drawings, stories, or tools tailored to their age and abilities

These processes reflect our commitment to creating environments where children are safe, seen, heard and valued, including through trusted adult relationships, visual supports and culturally responsive communication tools.

### Record Keeping and Privacy

All complaints are documented in line with privacy and information-sharing legislation. Records are retained securely and used to inform organisational learning and reporting.

### Analysis and Continuous Improvement

Complaint data is reviewed regularly to:

- Identify trends or systemic issues
- Inform training and policy updates

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- Strengthen risk mitigation strategies
- Support transparent reporting to Executive and the Board

Learning is used to improve systems and ensure children are protected, respected, and heard.

## Escalation and External Reporting

Where complaints involve significant risk or legal obligations, ECMS may notify:

- The Commission for Children and Young People (CCYP)
- Child Protection
- Victoria Police
- The Department of Education and Training (DET)

Families will be informed of this process unless it is unsafe to do so.

## Policy Review

This policy will be reviewed every 2 years or following a significant complaint, systemic failure, or legislative change.

## Roles & Responsibilities

Approved Provider/ Executive Team	Oversight of systemic risks and trends
Centre Directors/ Nominated Supervisors	Lead local responses, ensure records are kept, and escalate serious matters.
Risk and Compliance Team	Oversight of the complaints process, investigations, data analysis and reporting.
Employees, Volunteers, Contractors, Student Placement Workers, as well as Individuals sharing a common Workplace but not a common employer	Must report complaints or concerns and escalate where appropriate. Support a culture where children feel safe, seen, heard and valued.

## Related Legislation and Regulations

- Education and Care Services National Law Act 2010
- Education and Care Services National Regulations 2011
- Privacy Act 1988 (Cth)
- Child Wellbeing and Safety Act 2005 (Vic)
- Health Records Act 2001 (Vic)
- Information Privacy Act 2000 (Vic)
- Occupational Health and Safety Act 2004 (Vic)

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- Public Health and Wellbeing Act 2008 (Vic)
- Public Health and Wellbeing Regulations 2019 (Vic)
- National Quality Standard: QA2, QA3, QA6, QA7
- Child Safe Standards – Standard 2: Child Health and Safety

### Related Organisational Frameworks

- Assurance Framework
- Child Safeguarding Practice Framework
- Compliance Management Framework
- Financial Management Framework
- Incident and Complaint Management Framework
- Risk Management Framework

### Related Policies and Procedures

- Acceptable Use of IT and Online Safety Policy
- Child Health and Hygiene Policy
- Child Safe Handbook
- Child Safety and Wellbeing Policy
- Code of Conduct
- ECMS Reportable Matters Handbook
- Incident Reporting & Reportable Conduct Policy
- Interactions with Children Policy
- Participation of Students and Volunteers Policy
- Privacy and Confidential Information Policy
- Supervision of Children Policy
- Work Health & Safety Policy

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