



# **COMPLAINT HANDLING POLICY**

## **Dominican Sisters of Western Australia**

### **1. Introduction**

This Complaint Handling Policy establishes the overall framework by which the Dominican Sisters of Western Australia (Dominican Sisters WA) will welcome and respond to safeguarding complaints.

We aim to empower people to communicate their concerns and complaints without fear of retribution, discrimination or non-action by providing a transparent and responsive complaint-handling process, observing the principles of honesty, fairness and compassion for all involved parties, including the complaint maker and the person subject of the complaint.

Our complaint-handling prioritises the safety and wellbeing of children and adults at risk and have regard to any statutory obligations we may have to cooperate with other organisations.

### **2. Scope**

This Complaint Handling Policy has been approved by the Prioress and applies to all personnel engaged by the Dominican Sisters WA. It covers all aspects of activities of the Dominican Sisters WA, in any location.

It provides a process for personnel and members of the wider community to raise a safeguarding complaint, including disclosures, allegations or concerns about current or historical abuse of a child or adult related to the Dominican Sisters WA. It also details guidance on the response and action to be taken by the Dominican Sisters WA for different types of safeguarding complaints, recognising that the process for dealing with a particular concern will vary depending on the nature, circumstances and seriousness of the complaint.

The Complaint Handling Policy is supported by and should be read together with the following related documents:

- Safeguarding Children and Adults at Risk Policy
- Safeguarding Commitment Statement
- Code of Conduct<sup>1</sup>

Nothing in this policy affects the expectations outlined in other relevant Church documents or in civil law.

### **3. Definitions**

<b>Adult</b>	means any person 18 years or older, an inclusive term referring to all adults, including adults at risk. <sup>2</sup>
<b>Adult at risk</b>	means any person aged 18 years and over who is at increased risk of experiencing abuse, such as people: <ul style="list-style-type: none"><li>• who are elderly;</li><li>• with a disability,</li><li>• who suffer from mental illness;</li><li>• who have diminished capacity;</li><li>• who have cognitive impairment;</li></ul>

<sup>1</sup> Australian Catholic Safeguarding Ltd – *National Catholic Safeguarding Standards: 6.3.1 The Complaints Handling Policy is aligned, and operates in conjunction, with the Code of Conduct, HR, and other policies*, Ed 2, 2022.

<sup>2</sup> Australian Catholic Safeguarding Ltd, *National Catholic Safeguarding Standards, Edition 2*, 2022.

	<ul style="list-style-type: none"> <li>• who have suffered previous abuse;</li> <li>• who are experiencing transient risks;</li> <li>• who in receiving a ministry or service are subject to a power imbalance;</li> <li>• who identify as Aboriginal and/or Torres Strait Islander;</li> <li>• who are from a culturally and linguistically diverse background;</li> <li>• who are of diverse sexuality; and/or</li> <li>• who have any other impairment or adversity that makes it difficult for them to protect themselves from abuse.<sup>3</sup></li> </ul>
<b>Child</b>	means every human being below the age of eighteen years unless, under the law applicable to the child, majority is attained earlier. <sup>4</sup>
<b>Child Abuse</b>	<p>There are different legal definitions of child abuse in Australia. (<i>definition sourced from the Australian Institute of Family Studies: <a href="https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect">https://aifs.gov.au/cfca/publications/reporting-abuse-and-neglect</a></i>)</p> <p>Child abuse refers to any behaviour or treatment by parents, caregivers, other adults or older adolescents that results in the actual and/or likelihood of causing physical or emotional harm to a child. Such behaviours may be intentional or unintentional and can include acts of omission (i.e. neglect) and commission. Child abuse and neglect is commonly divided into five subtypes:</p> <ul style="list-style-type: none"> <li>• physical abuse;</li> <li>• emotional/psychological abuse;</li> <li>• neglect;</li> <li>• sexual abuse;</li> <li>• exposure to family violence<sup>5</sup></li> </ul>
<b>Child Sexual Abuse</b>	Sexual abuse occurs when an adult or someone physically stronger, bigger and/or older than the child uses power or authority over the child to involve the child in sexual activity. Physical force is sometimes involved. Contact offences include touching and fondling through to sexual penetration. Non-contact offences include verbal sexual harassment, indecent exposure, 'peeping' and exposure to pornography.
<b>Complainant</b>	means the person who has expressed the concern or made the report or disclosure on behalf of another affected person
<b>Complaint</b>	<p>means any safeguarding concern, report, allegation or disclosure about the [Dominican Sisters WA, including any behaviour by current or former personnel, including:</p> <ul style="list-style-type: none"> <li>• breaches of the Code of Conduct;</li> <li>• disclosures, allegations, or concerns of current abuse of a child;</li> <li>• an adult bringing forward a complaint of abuse suffered as a child; and</li> <li>• an adult bringing forward a complaint of current or past abuse experienced as an adult.</li> </ul>
<b>Dominican Sisters of Western Australia</b>	is a Pontifical Congregation in its own right, herein referred to as "the Dominican Sisters WA".
<b>Personnel</b>	includes Sisters, employees, volunteers and contractors engaged by the Dominican Sisters WA.
<b>Prioress</b>	refers to the elected Leader of the Congregation
<b>Respondent</b>	means a person against whom a complaint is made
<b>Safeguarding Advisor</b>	refers to the designated Sister, employee or volunteer who will take on the role of Safeguarding Advisor as outlined in this policy
<b>Australian Catholic Safeguarding Ltd</b>	refers to the independent body funded the Australian Catholic Bishops Conference, Religious Institutes and other Catholic organisations which sets and administers the National Catholic Safeguarding Standards and also deals with complaints of abuse by any Church personnel.

<sup>3</sup> Ib id.

<sup>4</sup> United Nations, *Convention on the Rights of the Child (Article 1)*, 1989.

<sup>5</sup> Australian Catholic Safeguarding Ltd, *National Catholic Safeguarding Standards, Edition 2*, 2022.

## 4. Principles

The Dominican Sisters WA acknowledges the potential for power imbalances between complainants and institutions and to address this will:

- have clear lines of accountability for handling complaints;
- uphold the right of individuals to complain and ensure that our complaint handling process is well promoted and accessible;
- apply the principles of procedural fairness to facilitate a just and impartial complaint handling process;
- promptly acknowledge complaints and address them according to urgency, keeping complainants and other involved parties informed throughout the process;
- offer and provide a just and compassionate response to complainants which safeguards the involved parties throughout the process, recognising that some complainants may need additional pastoral and other support;
- provide fair and proportionate responses to complainants; and
- comply with any relevant statutory and policy requirements, and canonical processes.

## 5. Making a Complaint

For emergency assistance or if someone is in immediate danger, call 000.

To report a non-urgent crime, call Police on 131 444.

A person wishing to report a safeguarding complaint related to the Dominican Sisters WA may do so by contacting:

- Western Australian Professional Standards Office (established by the Catholic dioceses of Western Australia) – call 1800 072 390
- any member of the Congregation Leadership Team; or
- the Prioress.

To raise concerns directly with the Dominican Sisters WA, call or email:

- +61 8 9446 7689
- [safeguarding@domsiswa.org.au](mailto:safeguarding@domsiswa.org.au)

### 5.1 Anonymous complaints

Complaints may be made anonymously. However, the Dominican Sisters WA recognises the difficulty with anonymous complaints in verifying relevant facts and being satisfied as to the legitimacy of the complaint, as well as the challenges that may arise in affording fairness to the person the subject of complaint in circumstances where the identity of the complainant is a central issue.

### 5.2 Whistle-blower provisions

A person who has raised a concern about suspected wrongdoing or made a formal complaint, has the right to continue to work in a discreet, safe and collegiate environment without the threat of intimidation, judgement or victimisation.<sup>6</sup>

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<sup>6</sup> National Catholic Safeguarding Standards (NCSS) 6.3.6 The Complaints Handling Policy and procedures empower and support personnel to raise, in good faith, concerns and allegations about unacceptable behaviour towards children and adults by other personnel.

## 6. Allocating Responsibility for Managing Complaints<sup>7</sup>

### 6.1 The complaint-handler

The Prioress will ensure that a suitable person(s) is appointed to manage a complaint. The complaint-handler is required to:

- be a point of contact for the complainant and the person the subject of complaint (and other involved parties) including police or external agencies (if relevant)
- conduct an initial assessment of the complaint, including carefully listening to the complainant's concerns and their desired outcomes
- seek advice from relevant external authorities (e.g., police, child protection authorities) when required and share relevant information
- keep appropriate, confidential records of the matter
- inform the complainant of their rights and support options (see sections 8.5.1 and 8.5.2 for supporting complainants and persons the subject of complaint)
- meet with and listen to the person the subject of complaint, fully informing them of the allegations made against them, making them aware of their right to a support person at the meeting and providing them with an opportunity to respond (see sections 8.5.1 and 8.5.2 for supporting complainants and persons the subject of complaint)
- respond to and resolve the complaint or, if it is not appropriate for the complaint-handler to resolve it, arrange for an appropriate person of authority to review, respond to and resolve the complaint
- keep those involved appropriately and regularly informed about the progress of the matter
- monitor the situation during and for the time soon after the resolution process, or longer as is deemed necessary.

### 6.2 The complaint decision-maker

For complaints that do not involve alleged conduct of a serious nature (e.g. allegations of abuse of children or adults at risk), the complaint-handler and the decision-maker can be the same person, particularly when informal resolution is adopted and disciplinary action regarding a member of personnel is an unlikely outcome of the complaint-handling process.

However, for complaints that are more serious (for example, complaints which have been the subject of an investigation process or where the outcome sought may require actions such as issuing a formal written apology or financial redress), a "complaint decision-maker" should be appointed.

In more serious matters, the decision-maker should not be directly involved in the investigation or resolution process but may receive updates about progress and give guidance and direction to the investigator. The decision-maker's role is primarily to review the relevant issues, evidence and recommendations arising from the complaint-handling/investigation process, and then make a final determination about the appropriate outcomes.

If the decision-maker decides to make a different finding or substitute a different outcome from what has been recommended by the complaint-handler/investigator, the rationale for this should be documented.

A decision-maker must not be involved in a decision where a conflict of interests exists, even if the decision-maker has the proper delegation or authority.

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<sup>7</sup> NCSS 6.1.5 The Complaints Handling Policy spells out who has responsibilities in relation to handling complaints and when procedures are enacted.

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### 6.3 Positions responsible for handling complaints about particular roles

Complaints made about individuals occupying the positions listed below should be reported to and handled by the 'responsible person' indicated.

Position	Responsible Person for receiving report & managing complaint
Prioress	Western Australian Professional Standards Office
Member of Leadership Team	Prioress

**NOTE:** Complaints made about the Prioress will be managed in line with the apostolic letter motu proprio [\*Vos Estis Lux Mundi\*](#).

## 7. Handling disclosures, allegations, or concerns of abuse

Any personnel who becomes aware of a concern about the safety of a child or adult at risk, whether by a direct or indirect disclosure or any other means, must report it as soon as practical to the Prioress.

If the concern relates to the Prioress, see section 6.3 above for alternative reporting options. Those required to make a report under legislation, policy or pursuant to any other requirement (reporters) may also contact the [Western Australian Professional Standards Office](#) for general advice.

The Prioress will provide advice and guidance on how the matter should be handled, including whether the conduct is 'reportable' and external authorities need to be notified (see below). The Prioress may contact the [Western Australian Professional Standards Office](#) for general guidance about external reporting obligations.

### 7.1 Current concerns about children

#### ***Reporting criminal conduct to Police***

Conduct towards a child/children which may be a criminal offence if proven<sup>8</sup> will be reported to Police as soon as possible (and before making a mandatory child protection report). The Prioress is responsible for ensuring that the Police report is made.

#### ***Reporting children at risk of harm***

Where there are reasonable grounds to suspect that a child or young person or a 'class of children' is at risk of harm, according to the reporting threshold for WA Department of Communities – [Child Protection](#), a report will be made to the child protection authorities.

The Prioress is responsible for determining if a child protection report is required and if so, ensuring that the report is made. However, this responsibility does not prevent personnel from immediately making a child protection report.

A mandatory reporter has a duty to report, as soon as practicable, the name, or a description, of the child and the grounds for suspecting that the child is at risk of harm. Mandatory reporters are legally protected against retribution for making or proposing to make a report.

#### ***Notifying reportable conduct***

The notification must be made within the timeframe stipulated in legislation. The Prioress is responsible for determining if a notification of reportable conduct is required and if so, ensuring the notification is made.

The Dominican Sisters WA must investigate the reportable allegation and report findings to the WA Ombudsman according to their requirements.

The Prioress may contact the [Western Australian Professional Standards Office](#) for general guidance about meeting their reportable conduct obligations, including engagement of an independent investigator.

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<sup>8</sup> See Glossary

## 7.2 Historical child abuse

Where the Dominican Sisters WA becomes aware of an allegation of historical child abuse (abuse experienced by a child who is now an adult), it will take the following steps:

- A child protection/risk of harm report will be made to the relevant statutory child protection body if there are grounds for suspecting that a child or class of children are at current risk of harm (eg. because an alleged offender has current access to children)
- A report will be made to Police in the following circumstances:
  - If Dominican Sisters WA knows or believes that a child under 18 years has been abused (sexual abuse, serious physical abuse or extreme neglect of a child) or knows or believes that they have information that might materially assist in securing the apprehension, prosecution or conviction of the offender, unless there is a 'reasonable excuse' for not reporting to Police, according to the relevant legislative definition.
  - If the Dominican Sisters WA knows that an adult working with them poses a serious risk of abusing a child (sexual or serious physical abuse).

The Prioress is responsible for ensuring that a child protection/risk of harm and/or Police report is made, if required, in response to a historical child abuse matter in accordance with legislative requirements.

## 7.3 Concerns about adults at risk

The Prioress is responsible for assessing if a concern about the safety of an adult at risk should be reported to an external agency such as Police, a health service or adult safeguarding agency. The assessment will have regard to:

- legislative requirements;
- whether an alleged offender is employed or engaged by the Dominican Sisters WA;
- the views and wishes of the involved adult;
- any diminished capacity on the part of the involved adult to make an informed decision;
- the seriousness of the concerns; and
- any potential or actual risks to children or other adults.

### ***Criminal offences***

Where the concerns involve a potential criminal offence (eg. physical or sexual assault) by a person engaged by the Dominican Sisters WA, a report will be made to Police as soon as possible.

Where the concerns involve a potential criminal offence by any other person, the Prioress will offer to source the support for the alleged victim to report the matter to Police.

In circumstances where we identify that the alleged victim has diminished capacity to make an informed decision about whether to report the matter to Police, the Dominican Sisters WA will do so on their behalf.

The Prioress is responsible for ensuring that the Police report is made.

### ***Safety concerns about older people or adults with disability***

Several cohorts of adults at risk are covered by legislative schemes and regulatory/oversight bodies, these include:

- Safety concerns for an adult in an aged care facility, respite and day care service or support services delivered in the home should be reported to the Aged Care Quality and Safety Commission
- Safety concerns that relate to the provision of a National Disability Insurance Scheme (NDIS) service should be reported to the NDIS Quality & Safeguards Commission

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- Safety concerns that relate to the abuse, neglect or exploitation of an adult with disability or older person living in their home (conduct by a member of the person's family, other informal supports, or members known to them from the community) should be reported to the relevant external body.

The Prioress is responsible for ensuring that a report about the safety of an older person or person with a disability is made, if required.

***Concern that an adult at risk may harm themselves or another person***

In an emergency, the Dominican Sisters WA will contact Police if there is concern that an adult at risk may harm themselves or another person.

***Other concerns about adults at risk***

Where appropriate, the Dominican Sisters WA may seek specialist advice and/or provide referrals to other agencies that can provide support to adults at risk. To facilitate this, we will ensure that we have access to community-based services, government agencies or other organisations that can offer information, advice and/or receive referrals.

## **8. Responding to Complaints**

When a safeguarding complaint is received by the Dominican Sisters of Western Australia, the complaint will be recorded, acknowledged and initially assessed by the Prioress or referral to the Western Australian Professional Standards Office

### **8.1 Recording the complaint**

The Dominican Sisters WA will make a record of the complaint, including:

- the name and contact details of the complainant;
- the issues raised in the complaint;
- the name of any person who is the subject of the complaint;
- the outcome sought by the complainant;
- information about any additional support required by the complainant;
- any other relevant information, including the names and contact details of potential witnesses, existing or potential sources of evidence; and
- the date and method of acknowledgement of the complaint.

The Prioress has overall responsibility for ensuring complaints are appropriately handled.

### **8.2 Acknowledging the complaint**

The Dominican Sisters WA will acknowledge the complaint as soon as possible and within five days of receipt.

The acknowledgement will include:

- a contact point for the complainant
- timeframe in which action will be taken
- the likely next steps
- if applicable (and known at the time), whether the matter must be reported to any external authorities (e.g., police, child protection authorities, regulatory/oversight bodies)
- advice about support options

The Prioress is responsible for ensuring complaints are appropriately acknowledged.

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### 8.3 Initial Assessment

The following factors will be considered as part of the assessment:

- did the issues raised occur within the person's role with the Dominican Sisters WA?
- is there any immediate or ongoing risk to any person's safety or wellbeing?
- does the complaint need to be reported to another agency (e.g., police or child protection authorities)?
- are the issue/s raised within the Dominican Sisters WA control to address?
- are the outcomes sought by the complainant viable?
- if more than one issue is raised, whether these will need to be addressed separately
- the seriousness of the complaint and whether it should be resolved urgently
- how the complainant is being affected by the issue/s raised and any additional support needs
- if there are any risks if resolution of the complaint is delayed
- if further information is needed to properly assess and resolve the complaint
- whether the complaint needs to be investigated or can be resolved informally via an alternative process without an investigation.

### 8.4 Options for resolving a complaint

After assessing the complaint, the complaint-handler will plan the actions required to manage and resolve it. Wherever possible, the Dominican Sisters WA will try to resolve complaints as soon as possible after they are made.

In some cases, it will be appropriate to informally resolve a complaint using an outcomes-based process. At other times, an evidence-based, formal investigation will be required. It may not always be clear at the outset of managing a complaint which is the best process and sometimes, it may be appropriate to move from an informal process to an investigation, or vice versa.

The nature and scope of any action taken will depend on a number of factors including:

- the circumstances of each case, including the risks involved
- any statutory requirements and whether other organisations (eg police/child protection authorities) are involved
- the issue(s) complained about
- the parties involved
- the likely outcome

#### 8.4.1 Disclosures, allegations, or concerns of abuse

Any disclosures, allegations, or concerns of abuse will be immediately responded to in accordance with the procedures outlined in section 6 of this policy.

#### 8.4.2 Informal resolution

The complaint-handler will determine the best way of informally resolving the complaint. Relevant considerations will include:

- the nature of the person's concerns
- how the person raised their concerns
- the person's preferences and what outcomes they are seeking.

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Sometimes, the person making the complaint may be satisfied with the opportunity to express themselves and be heard. Other possible options include providing an explanation, apology and/or making a practical change that addresses the person's concerns.

It may be appropriate to arrange a facilitated discussion between the relevant parties, for example a conciliation or mediation. This could be handled by the complaint-handler or another senior representative of the Dominican Sisters WA, or it may be more appropriate to bring in an external, independent party.

The Prioress is responsible for approving the proposed resolution method before it commences.

#### **8.4.3 Investigating a complaint**

If a complaint is unable to be resolved informally (or it is not appropriate to do so), the Dominican Sisters WA may decide to commence a formal investigation.

The appropriate investigative approach will depend on a range of factors including:

- the seriousness and/or complexity of the complaint
- the people affected by the complaint
- the possible outcomes including those sought by the complainant
- whether an independent investigation is required
- whether other authorities or agencies need to know about the complaint or be involved in responding to it.

The Prioress is responsible for approving a complaint investigation before it commences. The Prioress may contact the Western Australia Professional Standards Office, for assistance with engaging an independent investigator.

### **8.5 Supporting complainants and persons the subject of complaint**

The Dominican Sisters WA is committed to the wellbeing of all parties during the complaint handling process.

#### **8.5.1 Support for the complainant**

Appropriate steps will be taken to support and safeguard the welfare and dignity of complainants and their families. We recognise that some complainants may be highly vulnerable. We strive to identify when this is the case and to provide a compassionate response that is tailored to their needs.

Support for the complainant may include, but is not necessarily limited to:

- the offer of an independent support person to assist the complainant through the process;
- medical treatment and/or psychological support and counselling;
- referrals to support services;
- in appropriate cases, interim payments to assist the complainant with certain expenses (such as counselling) or to ameliorate financial hardship;
- advising the complainant that he or she has a right to independent legal advice;
- an explanation of the range of options available to the complainant to pursue the matter or obtain redress, e.g., criminal charges, civil claim for damages, application to the National Redress Scheme, or request for ex gratia compensation; and
- ongoing communication about the progress of the complaint process.

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In some cases, it may be appropriate to offer support to other people involved in or affected by the complaint, such as family members of the complainant or staff or volunteers affected by the disclosure.

It is the responsibility of the Prioress to communicate with the complainant (or other involved parties) in relation to offers of support and, where necessary, put measures in place to make the support available.

When a complaint is finalised, the Prioress will consider whether any form of ongoing support should be offered to the complainant or other people involved in or affected by the complaint.

#### **8.5.2 Support for the respondent**

The Dominican Sisters WA will take appropriate steps to support and safeguard the welfare of any person who is the subject of a complaint, recognising that this can be a stressful experience.

Support for the person who is the subject of a complaint may include, but is not necessarily limited to:

- an offer to develop and implement a support plan;
- medical treatment and/or psychological support and counselling;
- arrangements for a trusted friend or colleague to assist the person through the process;
- advising the person that he or she has a right to independent legal advice;
- an explanation of the process for managing the complaint, including the likely timeframe for resolution and what will be required of the person in the process; and
- ongoing communication about the progress of the complaint process.

It is the responsibility of the Prioress to communicate with the respondent in relation to their welfare and support needs.

#### **8.6 Conclusion of a complaint**

At the conclusion of a complaint resolution/investigation process, the complainant (and their parent/carer if the complainant is under 18, and it is safe and appropriate to do so) will be informed of the outcome, reasons for the decision, remedies available and options for review.

The respondent will also be advised of the outcome, reasons for decision, and review options.

The Prioress will determine what, if any, action should be taken as a result of the outcome of the investigation process. Action resulting from a complaint may include:

- an acknowledgement
- explanation
- an agreement between the parties
- a verbal or written apology
- criminal action or child protection action
- disciplinary action
- management action (eg providing/referring the person the subject of the complaint with counselling, professional training)
- offering ongoing support to the complainant (eg counselling)
- offering financial redress to the complainant
- improved policies or processes

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**NB: NCSS requires the following:**

*6.3.7 Where a complaint related to the sexual abuse of a child or adult against clergy or religious is substantiated under a civil standard, the Church Authority undertakes a risk management process to determine the appropriate action, in keeping with Church protocols.*

*6.3.8 Where a cleric or religious is convicted of a canonical offence relating to sexual abuse, the respondent is to be prohibited from the exercise of ministry until such time as the process for imposing a penalty is completed by the relevant dicastery.*

The Prioress is responsible for ensuring that complaints are satisfactorily finalised.

## 9. Complaint review options

If an individual is not satisfied with the outcome of a complaint, they may request an internal review be conducted by the Dominican Sisters WA. The request for review must be made within 14 working days from the date the outcomes of the process is made known to the individual. Reasons outlining why the review is being requested are to be included in the request.

The Prioress has responsibility for making the final decision on a complaint, including whether to conduct the review, based on the information provided to them.

The Prioress may decide to refer the request for a review to [Australian Catholic Safeguarding Ltd.](#)

A complainant or respondent can also request a review through [Australian Catholic Safeguarding Ltd.](#)

If an individual remains dissatisfied with how their complaint was handled, they may be able to take their complaint to an external agency such as a Court or Tribunal or the Australian Human Rights Commission.

## 10. Confidentiality and privacy

All parties involved in a handling a complaint must maintain strict confidentiality throughout the complaint process, including after an outcome is provided and actions taken. Information may be shared if it is necessary to address an immediate risk to the safety or wellbeing of any person, but only to the minimum extent necessary to address the risk.

This does not prevent the Dominican Sisters WA from requesting relevant information from external agencies, subject to legislative provisions, to facilitate necessary information sharing, or from fulfilling obligations to report relevant information to bodies such as the police or child protection services, or to other prescribed bodies.

The Dominican Sisters WA Privacy Policy applies.

## 11. Maintaining documentation

Documentation relating to complaints must be maintained, securely stored and kept confidential. Documentation must include sufficient information about the complaint, any steps taken to manage the complaint and any approach taken to resolve it.

Complaints that relate to incidents, allegations, disclosures, or concerns about the abuse of children or adults will be stored, protected and retained according to the Privacy Act, for a minimum of 50 years.

The Prioress is responsible for ensuring that documentation is maintained appropriately.

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## 12. Further Guidance

Safeguarding Children and Adults at Risk Policy

Code of Conduct

[Australian Catholic Safeguarding Ltd](#)

[Commissioner for Children & Young People WA](#)

NDIS Quality & Safeguards Commission - [For Participants - Make a Complaint | NDIS Quality and Safeguards Commission \(ndiscommission.gov.au\)](#)

## 13. Review of Complaint Handling Policy

The Complaint Handling Policy will be updated as required and reviewed at least every three years. The Dominican Sisters WA will consult stakeholders as part of reviewing the Complaint Handling Policy and related documents.

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