



"A lot of complaints processes take a really long time. It's exhausting when just getting basic support already takes forever."

"It needs to be specifics and not just jargon. There's a lot of words, but not a lot of meaning."

"To be able to have been heard and not risked the involvement of my parents when it was my parents."

"Not adaptive or supportive enough for being a young person."

Monitoring of Child-Focused Complaints Systems Report

"You don't want to further 'other' yourself."

"Being afraid [of] my care being compromised."

"I don't want to complain because what they're doing is discrimination, but they're lovely and I don't want to upset them."

"To not be looked down upon for doing it [raising complaints], being treated as a human."

"Didn't want to look ungrateful or be seen as a child by complaining about something 'minor and insignificant.'"

"Forms are too complex and dense."

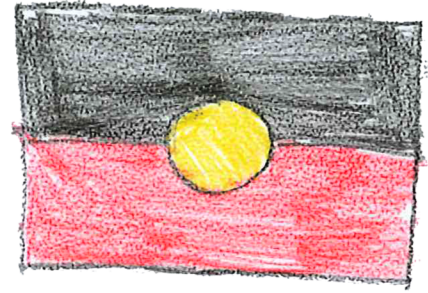
"If I tell someone something, I don't want it shared with others unless I agree."

"Knowing that it's anonymous – because if I tell someone something I don't want shared, if might get [back] to the person."

"Encouragement from authority figures that complaints are important and are taken seriously."

Acknowledgement of Country

The Commissioner for Children and Young People proudly acknowledges and pays respect to the Traditional Custodians of the lands across Western Australia and acknowledges the Whadjuk people of the Noongar nation upon whose lands the Commissioner's office is located.



She recognises the continuing connection to culture, lands, skies and waters, families and communities of all Aboriginal peoples. The Commissioner and her team also pay their respects to Elders, past and present and emerging leaders. The Commissioner and her team recognise the knowledge, insights and capabilities of Aboriginal people, and pay respect to Aboriginal ways of knowing, being and doing.

Who is the Commissioner for Children and Young People?

Jacqueline McGowan-Jones is the Commissioner for Children and Young People in Western Australia (WA). She has an important statutory role to monitor and review written laws, draft laws, policies, practices, and services affecting the wellbeing of children and young people under 18. The Commissioner has a duty to regularly consult with children and young people about issues that affect them and to promote the participation of children and young people in the making of decisions that affect their lives. She also has responsibility to encourage government and non-government agencies to seek the participation of children and young people in their work.

More information about the Commissioner and the work of her office is available from: ccyp.wa.gov.au.



A note about language

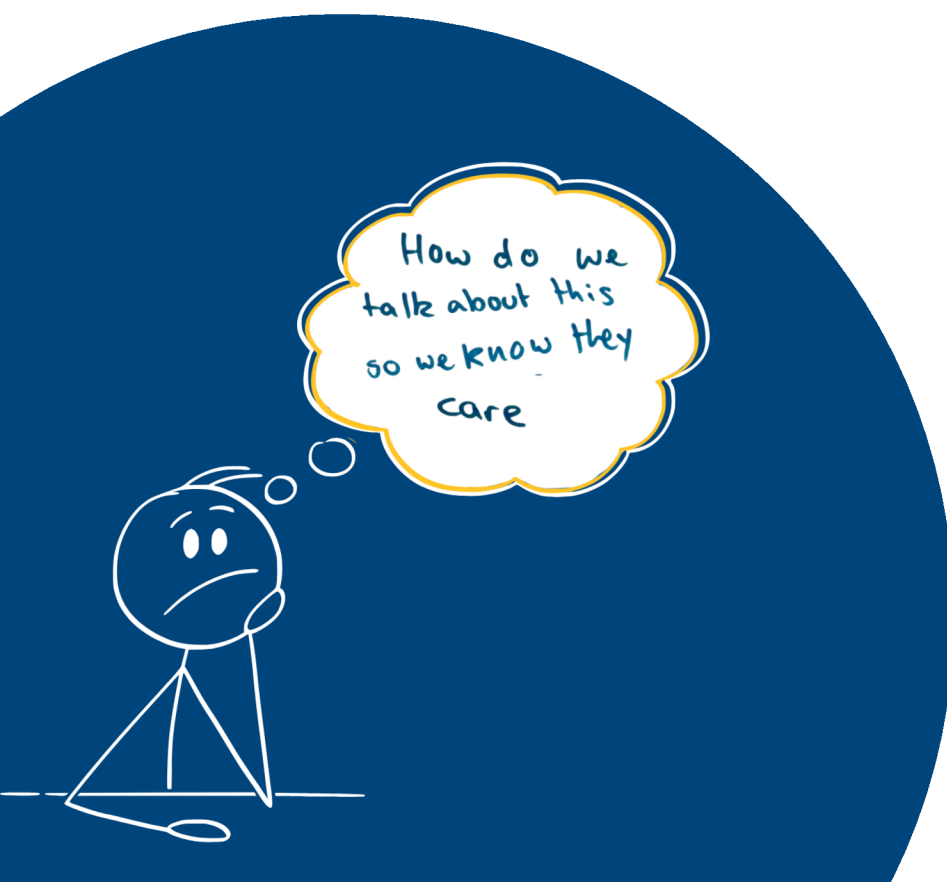
For the purposes of this report, the term 'Aboriginal' encompasses Western Australia's diverse language groups and recognises Torres Strait Islanders who live in Western Australia. The use of the term 'Aboriginal' in this way is not intended to imply equivalence between Aboriginal and Torres Strait Islander cultures, although similarities do exist.

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Message from the Commissioner

As the Commissioner for Children and Young People Western Australia, I have a statutory responsibility to ensure that the voices of children and young people are heard and acted upon. A critical part of this role is monitoring complaints made by children and young people to government agencies and organisations, assessing how these complaints are managed, investigated, and resolved.



In Western Australia, I have seen the consequences of inadequate complaints systems. It is essential that these processes are accessible, transparent, and child-friendly. Every child and young person should know where to raise concerns and have multiple avenues to do so, free from fear of harm or dismissal due to their age, race, ability or sexual orientation. They must also receive the information needed to make informed decisions.

Creating an effective complaints culture requires a whole-of-organisation approach. Leaders, management, and frontline staff all play a role in fostering an environment where children and young people feel safe and supported to speak up. Handling complaints effectively starts well before a formal process is initiated, it requires a proactive commitment to openness and continuous improvement.

This report builds on continued efforts to assess complaints systems and trends in government agencies and organisations. While some progress has been made, much work remains to ensure these systems are truly accessible, inclusive, and responsive to the needs of all children and young people, including those with disabilities and from culturally and linguistically diverse (CaLD) backgrounds. Clear and considered policies and procedures are vital to ensure complaints systems are genuinely responsive to their needs.

A critical concern is the lack of an independent oversight mechanism to ensure the implementation of the National Principles for Child Safe Organisations, as recommended by the Royal Commission into Institutional Responses to Child Sexual Abuse. I encourage the Ombudsman to drive accountability and improve complaints-handling processes across all organisations working with children and young people.

By committing to robust, child-friendly complaints mechanisms, we not only affirm their right to be heard but also address their concerns with the urgency they deserve. This is more than just a responsibility; it is an imperative. We must create a future where every young person feels empowered to raise concerns, confident that their voice will lead to meaningful change.

Jacqueline McGowan-Jones
Commissioner for Children and Young People WA

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Introduction

Monitoring the way organisations investigate complaints made by children and young people is one of the core functions of the Commissioner for Children and Young People in Western Australia.

The Commissioner works closely with government agencies and organisations to improve complaints processes to ensure children and young people feel safe and supported to raise complaints and speak up about their experiences.

When organisations handle complaints well, children and young people:

- Are treated with respect and dignity
- Have their complaints responded to promptly and thoroughly
- Have confidence in complaints systems
- Are at less risk of harm

Resolving complaints must be focused on the needs and rights of children and young people. Children and young people have a right to feel safe and to have their concerns heard and addressed.

“The ability to stand up and make a complaint is something young people struggle with.”

The Commissioner for Children and Young People Act 2006 WA (the Act) assigns the Commissioner the following complaints monitoring functions:

- | | |
|---------|---|
| s.19(d) | to monitor the way in which a government agency investigates or otherwise deals with a complaint made by a child or young person and the outcome of the complaint |
| s.19(e) | to monitor the trends in complaints made by children and young people to government agencies |

In undertaking these responsibilities, the Commissioner must also have regard for the United Nations Convention on the Rights of the Child which upholds the right of all children and young people to be protected from harm, to be safe, feel safe and be respected wherever they are, and to participate in decision making that affects them.ⁱ

Effective complaints systems are crucial for an organisation to continuously improve services to meet the needs of its users. Many organisations assess their complaint management processes against AS/NZS 10002:2014 Standard, which sets out a range of guiding principles.ⁱⁱ However, to meet the needs of children and young people, organisations must take a targeted child-focused approach in developing its complaints systems.

Agency progress since 2021

In 2021, the focus of the complaints monitoring survey centred on government agencies. A comparison since 2021 shows considerable, yet not consistent, improvement in child-focused complaints processes across agencies.

Eleven agencies (58 per cent of those engaged in child-related work) have made active steps towards improving the child-focused nature of their complaints systems for children and young people since 2021.

Four of those agencies have made significant improvements, and seven agencies have made considerable improvements in developing child-focused complaints systems in alignment with National Principle Six.

Critically, the Commissioner found that 42 per cent of agencies engaged in child-related work, as defined by the Royal Commission into Institutional Responses to Child Sexual Abuse (The Royal Commission), have not demonstrated taking active steps towards developing a child-focused complaints system since 2021.

Royal Commission into Institutional Responses to Child Sexual Abuse

The Royal Commission highlighted that children and young people face unique obstacles when using complaints systems. To address these barriers, organisations and agencies must tailor their complaints policies and processes to enhance accessibility and responsiveness.ⁱⁱⁱ

The Royal Commission recommended that organisations working with children and young people adopt child-safe practices.

Consistent with Recommendation 6.4, organisations should uphold the rights of the child and act with the best interests of the child as a primary consideration.^{iv} To achieve this, it is imperative that organisations implement National Principles for Child Safe organisations, as identified by the Royal Commission.

Recommendation 6.6 of the Royal Commission requires organisations to implement child-focused complaint-handling processes, ensuring that:

- Complaint handling systems are child-focused and understood by children, staff, volunteers, and families
- Complaint handling policies and procedures clearly outline roles and responsibilities, approaches to dealing with different types of complaints and obligations to act and report
- Complaints are taken seriously, addressed promptly and thoroughly, and comply with reporting, privacy and employment law obligations^v

In responding to these recommendations, the Council of Australian Governments (COAG) endorsed the National Principles for Child Safe Organisations (National Principles) in February 2019. A full list of the National Principles can be found in Appendix D.

The St. Andrew's Hostel Inquiry in 2012 into the sexual misconduct at St Andrew's Hostel Katanning highlighted the serious consequences that can arise when complaints processes for children and young people fail.^{vi} Of significance in this case was the apparent lack of an independent external "child-friendly" complaint mechanism through which children and young people could confidently make a complaint.^{vii}

Recommendations from the St. Andrew's Hostel Inquiry emphasised the need for the development of a comprehensive, child-focused complaint system that includes a model with multiple avenues for raising complaints, ensuring that children and young people have access to the support they need.^{vii} A comprehensive model must allow complaints to be made externally so that they can be addressed independently and children and young people can be supported throughout the complaint process.

This report highlights key gaps in current complaints systems and identifies the changes needed to ensure they are inclusive and effective. Critically, it identifies the importance of establishing an independent oversight mechanism to ensure implementation of the National Principles and hold organisations accountable for meeting these principles. Establishing clear mechanisms for both individual and systemic-level feedback, enables children and young people to voice concerns, complaints, disclosures, or suspicions of harm. Implementing child-safe measures is the foundation of a child-focused complaints system.

National Principles for Child Safe Organisations

The National Principles for Child Safe Organisations (specifically National Principle Six) requires organisations to establish child-focused processes for addressing complaints and concerns from children and young people. It outlines key areas of action for agencies and organisations to ensure that their complaints policies and processes are accessible, effective, culturally safe, and easily understood by children, young people, and their families.

Child-complaints processes should be responsive and clearly define roles and responsibilities including obligations to report and act on child safety concerns. Complaints systems should take child complaints seriously, be prompt, comply with legal obligations and uphold reporting, privacy, and employment standards.

Key action areas:

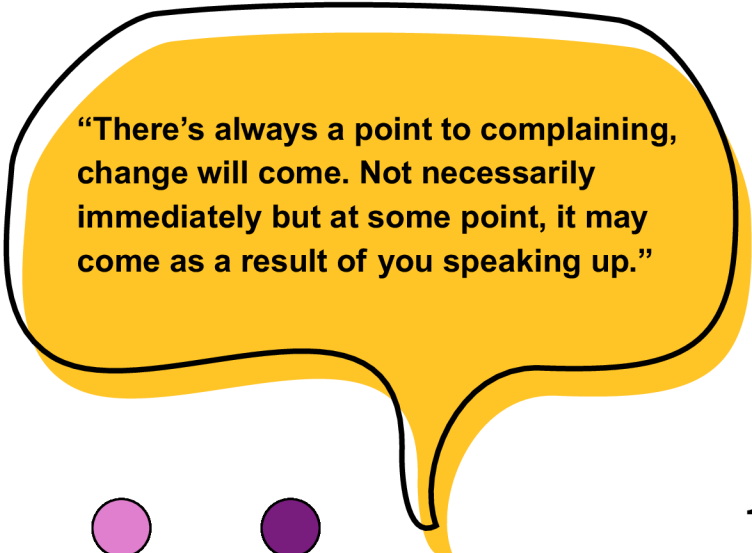
- 6.1 The organisation has an accessible, child-focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report
- 6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally-safe
- 6.3 Complaints are taken seriously and responded to promptly and thoroughly
- 6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, regardless of whether the law requires reporting, and co-operates with law enforcement
- 6.5 Reporting, privacy and employment law obligations are met

The Commissioner has published a range of resources to help government agencies and organisations understand and implement the expectations of the National Principles for Child Safe Organisations.^{ix} Information on the National Principles, including in different community languages, is available through the [National Office for Child Safety website](#).^x

Building a Complaint System that Works for Children and Young People

Through a series of focus groups and an online survey, children and young people shared their views with the Commissioner on child-friendly complaints systems.

Children and young people emphasise the need for child-focused complaints systems that are **safe**, ensure **confidentiality** and protection from retaliation; are **accessible**, with clear language, multiple formats and methods, and simple processes; and are **empowering**, fostering confidence in self-advocacy. They must also be **responsive**, ensuring complaints are heard, acted upon, and followed up with meaningful updates, and are **supportive**, shifting the culture from blame and confrontation to a culture of **collaboration**, problem-solving, and fairness.



“There’s always a point to complaining, change will come. Not necessarily immediately but at some point, it may come as a result of you speaking up.”



Background

In line with the statutory functions set out under the Act, former Commissioners surveyed government agencies on their complaint systems and the complaints received from children and young people in 2010, 2013, 2015, 2018, and 2021.

Table 1 summarises the incremental but limited improvement from 2010 to 2021 in recognising children and young people as potential or material complainants.

Table 1: Summary of Complaints Monitoring Surveys (2010 to 2021)

Year	Key findings
2010	Agencies were unable to report separately on complaints made by children and young people.
2013	Agencies identified provision for recognising children and young people in their complaints processes.
2015	40% of agency policies identified children and young people as potential complainants. Half of the agencies recorded the number of complaints received by, or on behalf of, children and young people.
2018	46% of agencies recorded the number of complaints concerning children and young people. 32% of complaints received were directly from children and young people.
2021	65% of agencies recorded the number of complaints concerning children and young people. 37% of complaints received were directly from children and young people.

The Commissioner's 2021 report on complaints monitoring highlighted that, while many government agencies had structured their systems on the AS/NZS 10002:2014 Standard, they often failed to adapt processes to meet the needs of children and young people.

The 2021 survey showed limited and inconsistent progress by agencies to ensure the concerns of children and young people are heard and acted upon. Consultation with young people demonstrated that there is much work to be done by agencies to improve the experience of children and young people when making a complaint.

In 2024, the Office of the Commissioner for Children and Young People streamlined the complaints monitoring process for organisations. Accordingly, some results are not directly comparable to previous complaint monitoring reports. Where applicable, these changes are explained in the relevant sections of the report.

Overview

In 2024, the Commissioner invited 43 government agencies, local governments, and non-government organisations to participate in the complaints monitoring process.

38 organisations completed the survey and were engaged in the 2024 monitoring process. This included:

- 4 TAFE providers
- 3 local governments
- 2 non-government organisations
- 4 accountability agencies
- 25 government agencies

Five organisations did not respond to the survey, with one organisation exempt from participation. A full list of organisations, government agencies and local governments invited to participate can be found in Appendix C.

Participation in Survey

Under the Act, the Commissioner has the power to request relevant information from government agencies and organisations regarding their handling of complaints from children and young people (s.21(1); s.22).

These powers provide the Commissioner with the authority to request information relevant to the Commissioner's functions to monitor the way in which government agencies and organisations investigate complaints from children and young people. This information enables the Commissioner to have oversight and advocacy for improvements in complaint-handling mechanisms to better support the rights and voices of children and young people.

Given several agencies and organisations did not respond or declined to participate, the Commissioner may enforce these powers in the next monitoring cycle in 2026. This will require all requested agencies and organisations to provide data relating to complaints received from children and young people, as well as relevant information relating to their child-focused complaints policies, processes and systems.

Complaints Monitoring Process 2024

The Complaints Monitoring Process 2024 involved a streamlined approach to assess and evaluate the implementation of child-friendly complaints processes across all organisations, in alignment with National Principle Six: Processes to respond to complaints and concerns are child focused. This alignment ensures that all agencies and organisations, particularly those identified as in child-related work, are monitored equally for their achievement towards child-focused complaint handling.

The monitoring cycle for 2024 took a new approach, moving away from self-assessment responses to a detailed process that:

- Examines specific data kept by organisations on complaints from children and young people or those made on their behalf
- Examines the child-focused nature of each complaints system, including policies and procedures on complaints handling
- Is inclusive of children and young people in the monitoring process
- Seeks feedback from children and young people about their actual experience in voicing concerns to organisations

The Commissioner's evaluation was based on the policies, evidence and commentary provided by organisations that demonstrated their child-focused complaint systems. Independent investigation of individual complaints systems was outside the scope of this review. It is acknowledged that some organisations may be actively working to progress the implementation of child-focused complaints processes.

Phase One (mid to late 2024)

Data Analysis

Organisations were asked to provide data on complaints received from, or on behalf, of children and young people during the 2023 calendar year (monitoring period), along with their complaints policies and procedures for children and young people.

Organisations answered questions about:

- How they engage with children and young people
- The number and main issues of complaints from, or on behalf of, children and young people
- Outcomes of the complaints process for children and young people
- Complaint management systems and processes

A full list of survey questions is available at Appendix A.

The Commissioner evaluated each organisation's performance by analysing the provided data, policies, procedures, and evidence against the indicators of National Principle Six.

A performance evaluation framework was used, outlining specific criteria for each indicator against five rating levels: starting point, developing, meets requirements, strong or proactive. This is provided at Appendix B.

Phase Two (early 2025)

Engagement with Children and Young People

In Phase Two of the Complaints Monitoring Process, the Commissioner sought direct input from children and young people to assess the child and youth-focused nature of complaints policies and processes.

The Commissioner and her team engaged with children and young people to hear their experiences in raising complaints and to listen to their ideas and perspectives about how organisations can improve child and youth-friendly complaints processes. Children and young people were invited to share their experiences in making complaints with government agencies and organisations. Their feedback is woven throughout this report.

Individual Feedback to Organisations

During Phase Two, the final report was drafted outlining key findings and recommendations for organisations. Organisations also received individual feedback, providing tailored guidance on improving the accessibility, responsiveness and youth-friendly nature of complaints systems and processes to better support children and young people.

Phase Three (mid 2025 to mid 2026)

Ongoing guidance and support

Following this report and individual feedback to organisations, the Commissioner will continue working with agencies and organisations to support their ongoing progress in developing and improving child-focused complaints systems and processes. The Commissioner aims to foster a culture of continuous improvement towards child-focused complaints systems, that ultimately leads to a more supportive and accountable system for children and young people.

Key Findings and Recommendations

Based on the Commissioner's key findings, organisations should ensure the following items are addressed, as soon as possible, and no later than 2026 to ensure complaints mechanisms align with National Principle 6.

Key Findings	Recommendations
Finding One The Commissioner's evaluation of organisation's responses, evidence and documentation showed that: 63% of organisations are yet to take an intentional approach to developing child-focused complaints handling policies and processes for children and young people.	Recommendation One All agencies and organisations should implement child-focused complaints policies and processes that prioritises the safety and wellbeing of children and young people. Child-focused policies and processes should: • Identify 'children and young people' as potential complainants. • Promote the organisation's willingness to listen to complaints from children and young people and have their voices taken seriously. • Identify what constitutes a complaint by children and young people and explicitly identify approaches to dealing with different types of complaints made by children and young people. • Describe how complaints processes will be adapted for children and young people, including additional supports available. • Outline clear roles and responsibilities of leadership, staff and volunteers in relation to complaints made by children and young people. • Clearly identify response and resolution timeframes for complaints made by children and young people. • Identify risk-escalation and investigation processes for child-related complaints based on type and severity. • Describe the organisations approach to prioritising and maintaining child safety and wellbeing.
Finding Two 29% of organisations reported that they do not promote their child-friendly complaints systems to children and young people through any of the following modalities: face to face, text, email, app, social media or website.	Recommendation Two All agencies and organisations should: • Engage children and young people in the design and promotion of your child and youth-friendly complaints mechanisms, including adopting multiple modalities such as face-to-face, website, social media, app-based, email, text, and monitored website chat functions.

Finding Three 85% of organisations reported that they did not involve children and young people in the design, implementation and ongoing improvement of their complaints handling systems.	Recommendation Three • Engage with children and young people in the design, implementation and ongoing improvement of child and youth-focused complaints handling processes, including the development of child and youth-friendly resources. • Organisations should consider the Commissioner for Children and Young People's <u>Participation Guidelines</u> to guide engagement with children and young people.
Finding Four 40% of organisations reported that they do not have a data management system to record complaints made by or concerning children and young people.	Recommendation Four • Implement data management systems to record and systemically analyse complaints received from, or on behalf of, children and young people. This should include capability of systems to capture age and consent. • Include routine and consistent reporting to the executive and oversight of all complaints made by, or on behalf of, children and young people.
Finding Five 55% of organisations reported that they did not have information and resources about complaints processes for children and young people that is age and developmentally appropriate.	Recommendation Five • Develop child-friendly and age-appropriate complaints information and resources for children and young people in a range of accessible formats. • Provide information to adults who may make complaints on behalf of a child or young person, including culturally appropriate resources for Aboriginal and other culturally diverse families, carers, communities and support networks. • Where adults make a complaint on behalf of a child or young person, evidence should be provided to demonstrate that the child or young person is aware of the complaint being made on their behalf.
Finding Six 34% of organisations reported that they did not use any resources in the development of their complaints policies and processes for children and young people.	Recommendation Six All agencies and organisations should use the following resources to guide the development of child-focused complaints policies and processes: • Commissioner for Children and Young People's <u>Child Friendly Complaints Guidelines</u> • <u>National Principles of Child Safe Organisations</u>, specifically National Principle Six • National Office for Child Safety and Commissioner for Children and Young People's <u>Speak Up and Make a Complaint</u> resource • National Office for Child Safety, <u>Complaint Handling Guide: Upholding the rights of children and young people</u>

Finding Seven Many agencies engaged directly in child-related work lack complaints processes that are independent and external to the individual services provided to children and young people.	Recommendation Seven Many agencies engaged directly in child-related work lack complaints processes that are independent and external to the individual services provided to children and young people.
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Analysis

Engagement with children and young people

Complaints handling systems should be tailored to each organisation and its service environment. Every organisation is different in their level of engagement with, and the services provided to, children and young people.

Regardless of the size or complexity of an organisation, complaints handling systems should always seek to promote the rights, safety and wellbeing of children and young people across Western Australia.

Four organisations identified that they did not work with children and young people in any capacity, nor did they indicate that they worked with the broader community. However, the Commissioner identified areas of intersection with these agencies and children and young people. As such, the Commissioner's office will engage with these organisations to explore ways to further improve their child-focused complaints systems to ensure that they are meeting the needs of children and young people.

The Commissioner also has a statutory responsibility to monitor complaints systems in non-government organisations funded by government agencies. Twenty-nine per cent of government agencies reported that they contract, or otherwise fund an external organisation or body to provide services for children and young people. It is critical for all agencies to ensure that any non-government organisation they engage with also establishes child-friendly complaints systems for children and young people using their services.

Child-focused complaints systems

More than one-third of organisations demonstrated taking an intentional approach in establishing a child-focused complaints system for children and young people (37 per cent of organisations). These organisations were able to demonstrate that they met or strongly exceeded the requirements of National Principle Six. They clearly identified 'children and young people' as potential complainants and clearly outlined how their organisation's complaints process would be adapted for children and young people.

Twenty-one per cent of organisations demonstrated that they have taken some steps towards establishing a child-focused complaints system but require significant improvements to meet the requirements of National Principle Six.

Thirty-two per cent of organisations demonstrated that they had taken no or minimal steps towards establishing a child-focused complaints system. Many of these organisations failed to explicitly identify 'children and young people' as potential complainants and were not able to demonstrate how their complaints processes would be adapted for children and young people. Of these organisations, one identified that they work with children and young people as their core business, and five identified that they have a specific section that works directly with children and young people.

Two organisations did not provide evidence or documentation for assessment.

Data management systems

Organisations should have a clear system for recording and documenting complaints made directly by, or on behalf of, children and young people. This includes establishing a secure database for collecting, monitoring, and assessing data from complaints concerning children and young people. Monitoring complaints regularly helps organisations to identify trends and systemic issues that are arising for children and young people.

Sixty-three per cent of organisations reported that they have a data management system to record complaints made by or concerning children and young people. This is a similar finding to 2021, where 65 per cent of agencies reported recording complaints concerning children and young people.

It remains highly concerning that 37 per cent of organisations reported that they do not have a data management system to record complaints made by, or on behalf of, children and young people. Notably, five of these organisations reported having a dedicated section that works directly with children and young people, with one organisation identifying working with children and young people as their core business.

Furthermore, some organisations reported that they had no mechanism for collecting, collating, and recording complaints concerning children and young people. It was noted, however, that many organisations reported improvements to complaints mechanisms and data recording is currently in progress.

Executive boards should have direct oversight of complaints made by children and young people about the organisation's services and staff conduct. Seventy-six per cent of organisations stated they report complaints data to their executive board regularly, typically on a monthly or quarterly basis.

Organisations should be guided by National Principle One, embedding child safety and wellbeing in organisational leadership, governance and culture.

Total complaints received

Complaints processes must take a flexible approach, empowering children and young people to raise complaints and reduce barriers for children and young people to do so independently.

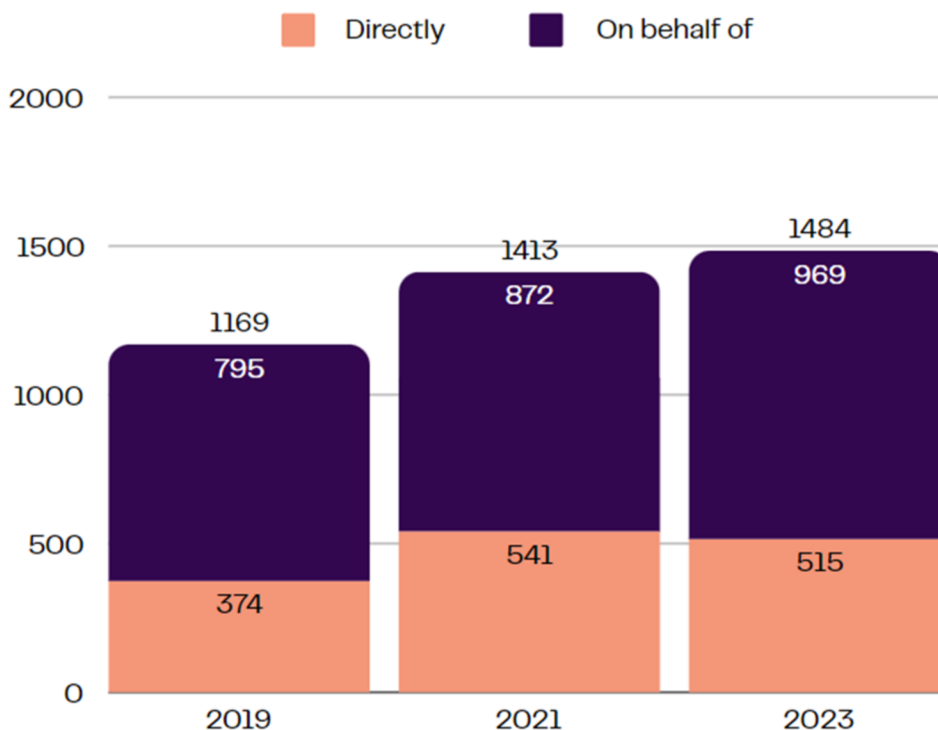
Complaints made by children and young people come from multiple avenues:

- Children and young people raising complaints independently
- Children and young people raising their own complaints with the support of their parents, carers, trusted adults or their peers
- Parents, carers or guardians raising complaints on behalf of children and young people, with the consent of children and young people where appropriate

A truly child-friendly complaints system should empower children and young people to raise concerns independently, while also supporting parents and guardians who need guidance in navigating the system to raise complaints on their behalf.

During the monitoring period (2023 calendar year), a total of 1484 complaints were made by, or on behalf of, children and young people to 23 organisations. Fifteen organisations did not receive any complaints from children and young people.

Graph 1: Total complaints made directly, or on behalf of, children and young people (2019-2023), as reported by organisations



It was encouraging to see that children and young people were able to access and navigate the complaints systems of 23 organisations to raise a complaint. Of the 1484 complaints received, 710 were to organisations who reported working with children and young people as their core business, 925 complaints were to organisations with a specific section working with children and young people.

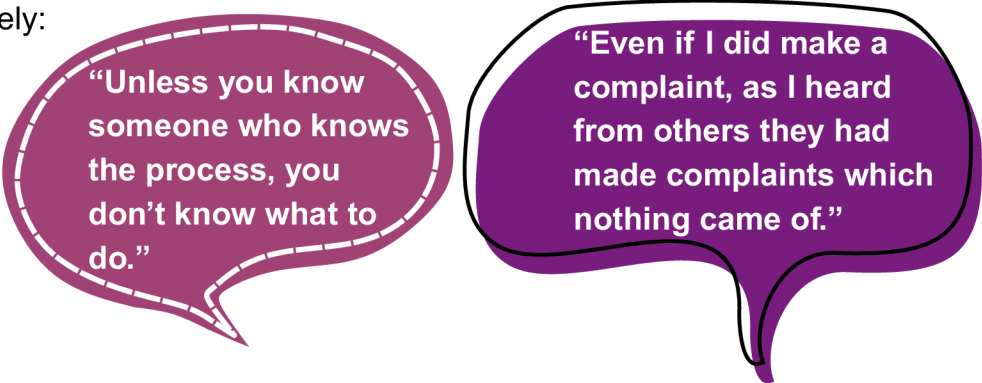
While most organisations were able to identify that a child or young person had made the complaint, many were unable to specify the ages of complainants.

Sixteen organisations reported that they received no direct complaints from, or on behalf of, children and young people. Of these 16 organisations, 13 reported working with children and young people, either directly or indirectly.

It is important to note that although many organisations reported receiving few or no complaints from children and young people, this is not necessarily an indication that organisations are successfully meeting the needs of children and young people.

It may be that an organisation is failing to effectively engage with children and young people, that they do not have a child-friendly complaints process, or that children and young people are unaware they can make a complaint to the organisation.

Many children and young people have reported they faced barriers to raising concerns and complaints effectively:



Many children and young people have expressed concerns they felt **“like nothing would be done”** if they raised a complaint, that they **“were unsure if it will be taken seriously or enough action towards [an] issue”** or that they didn’t **“even know where to go to raise a complaint”**.

Graph 2: Number of complaints received per organisations



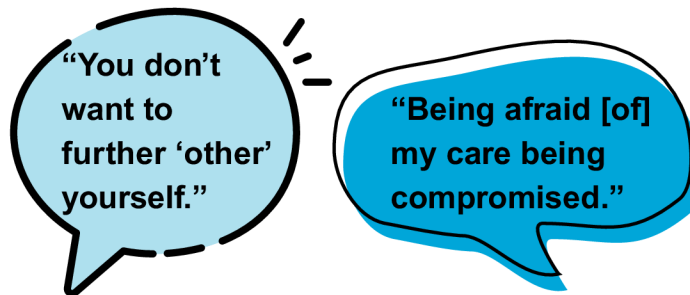
For organisations who did not receive any complaints from children and young people, this may be because:

- Children and young people are satisfied with the services provided and have no reason to raise a complaint
- Children and young people have informally raised their concerns directly with staff and are satisfied with the way they were handled, and these concerns were not captured in the organisation's complaint system

Other reasons for an organisation having no reported complaints from children and young people may include:

- The organisation does not have a feedback and complaints process that is easy to use or accessible for children and young people
- Children and young people do not feel safe and supported to speak up and raise their concerns to the organisation
- The organisation discourages children and young people from making complaints
- Children and young people are not aware of independent oversight bodies to make complaints to or how to make complaints to an oversight body

Many young people have also expressed concerns around the fear and stigma of raising a complaint.



Organisations should actively seek to understand why they may not have received any complaints from children and young people.

- Do children and young people feel confident to be able to come forward and make a complaint? Do they know how to make a complaint?
- Do children and young people feel like they will be heard?
- Are children and young people confident that their issue can be resolved thoroughly?

Many young people were reluctant to complain because they fear it will damage relationships or upset people.



Complaints made directly by children and young people

A total of 515 complaints were made directly by children and young people to 16 organisations. This constituted 33 per cent of all complaints made by, or on behalf of, children and young people.

Table 2: Complaints made directly by children and young people (by age group)

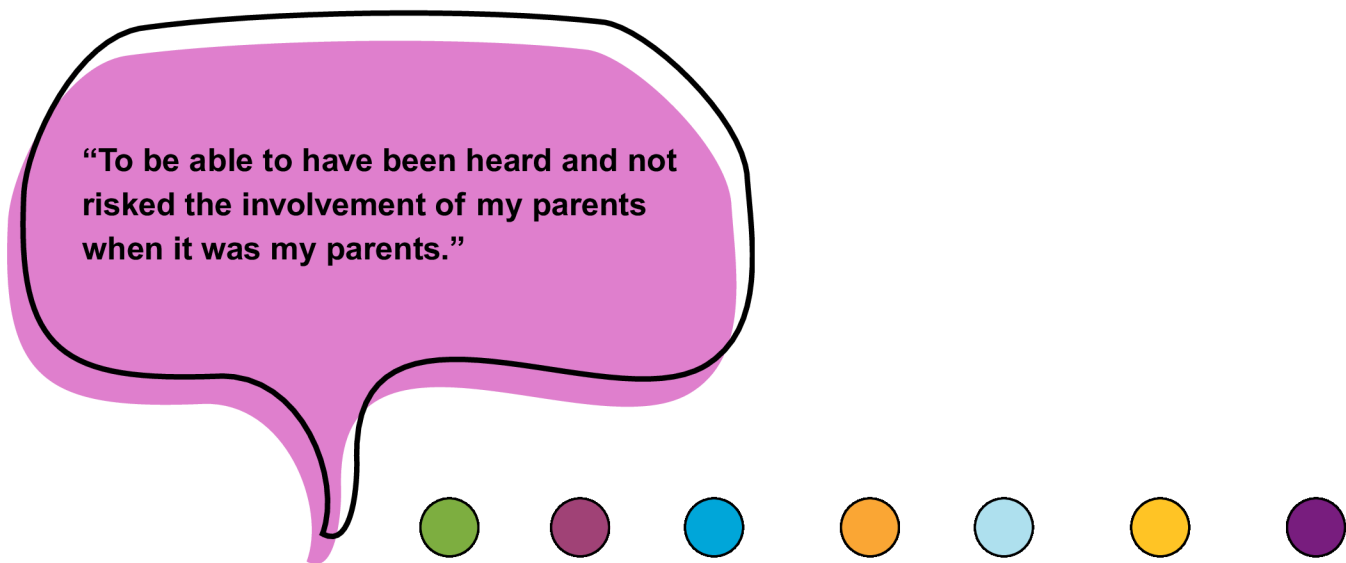
0-5 years	6-11 years	12-17 years	Total
1	11	488	515

Six of these organisations reported working with children and young people as their core business, nine organisations reported they have a dedicated section that works with children and young people.

The breakdown by age indicates that organisations must significantly improve complaints processes to ensure young children have accessible, age-appropriate and inclusive mechanisms to raise concerns and complaints. This includes appropriately capturing complaints and concerns raised by young children within data management systems.

One organisation reported that complaints made by children and young people at the local level were often resolved informally and therefore did not enter the formal complaints process and were unable to be captured by the data.

It is critical that all complaints made directly by children and young people are captured in the data management system so that systemic issues can be identified.



Complaints made on behalf of children and young people

969 complaints were made on behalf of children and young people to 19 organisations. This constituted 67 per cent of all complaints made by, or on behalf of, children and young people. Seven of these organisations reported working with children and young people as their core business, with 13 organisations reporting having a specific section that works directly with children and young people.

Understandably, a significant proportion of the complaints reported in the 0-5 years age range were made on their behalf by an adult.

Table 3: Complaints made on behalf of children and young people by an adult (by age group)

0-5 years	6-11 years	12-17 years	Total
300	199	363	969

Notably, a similar proportion of the complaints reported in the 12-17 years age range were also made on their behalf by an adult. The high number of complaints made on behalf of young people (aged 12-17 years) by an adult may be due to the barriers young people face in accessing complaint processes, fear of repercussions, lack of awareness about their rights, or dependence on trusted adults to advocate for their concerns.

There was considerable discrepancy among organisations regarding what can be defined as a complaint made on behalf of a child or young person’. One organisation reported that they received complaints from adults operating independently of the young person, who was often not aware of the complaint being made on their behalf.

Organisations should take guidance from the terminology outlined in the [National Office for Child Safety \(NOCS\) ‘Complaints Handling Guide’](#) to support data captured on complaints made on behalf of children and young people, or ‘adult-initiated complaints’.^{xi}

Adult-initiated complaints are those involving a child or young person’s parent, carer or guardian or other adult making a complaint on behalf of, or that concerns, a child or young person. For these types of complaints, NOCS notes that it is important to identify with the complainant whether the child is aware that the concerns have been raised on their behalf, and the nature of any discussions that complainant has already had about the complaint with the child or young person.^{xii}

All complaints concerning children and young people to an organisation should be captured within their data management system, including age and whether consent has been provided by the child or young person.

Trends in complaints concerning children and young people

By collecting data on complaints, and analysing it regularly, organisations can identify trends and systemic issues for children and young people. This information also strengthens the ability of the Commissioner to identify systemic issues affecting the wellbeing of children and young people across Western Australia.

Organisations reported on the main issues arising from complaints concerning children and young people in the monitoring period.

Complaints from children and young people included concerns about:

- Communication or a failure to communicate (e.g. failure to listen, inappropriate communication)
- Accessibility (e.g. poor access to services, lack of support, delays or long wait times to access services)
- Service delivery (e.g. staff shortages, wait times, incorrect information provided)
- Quality of service provision (e.g. inadequate standard of performance, program quality)
- Policies and procedures (e.g. perceived inconsistency in application)
- Inappropriate behaviour of other children and young people
- Professional conduct of staff and/or volunteers (e.g. unprofessional behaviour, lack of politeness/kindness, lack of support by caseworkers)
- Costs (e.g. for public transport fares, parking, fees to access services)

A concerning finding was that 369 complaints were raised about an employee or volunteer of an organisation, yet only 45 per cent of organisations said that improving training and staff capability was an outcome of complaints received.

Complaints outcomes

While complaints vary from one to the next, it is important that organisations make decisions and deliver outcomes that are consistent for children and young people. Outcomes should be fair for all parties and should be determined in the best interests of the child or young person.

Providing reasons for how an organisation has reached a decision or an outcome in relation to an investigation or resolution of a complaint is a critical element of a child-focused complaints system. Children and young people are more likely to be satisfied with an outcome of a complaint and have confidence in the process, if they understand why decisions were made or actions taken.

Organisations were asked to report the types of outcomes of the complaints. The most common outcomes provided by organisations to complaints concerning children and young people were:

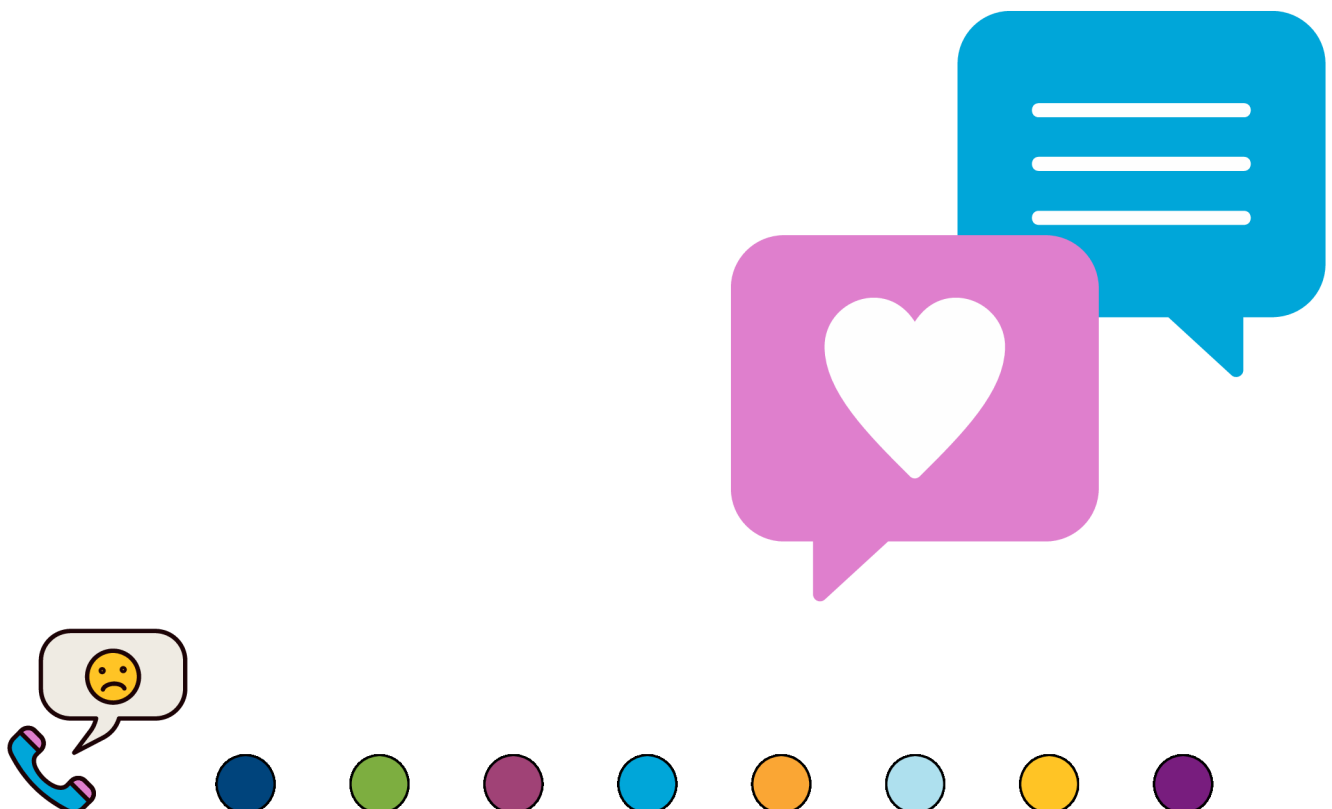
- Acknowledgement – 61% reported this as an outcome provided
- Apology – 50% reported this as an outcome provided
- Explanation – 50% reported this as an outcome provided
- Action – 50% reported this as an outcome provided
- Improved training and staff capability – 42% reported this as an outcome provided

These outcomes were utilised more often than improvement actions such as:

- Improving policies or processes – only 39% reported this as an outcome provided
- Reviewing communication methods used with children and young people – only 26% reported this as an outcome provided
- Analysing feedback and complaints data and identify trends for performance/service improvement – only 26% reported this as an outcome provided
- Reviewing code of conduct for all staff - only 8% reported this as an outcome provided

Some organisations reported they respond to all complaints concerning children and young people with acknowledgments and apologies as appropriate.

Only 26 per cent of organisations reported that they analysed feedback and complaint data concerning children and young people to identify trends for performance or service improvement.



Feedback to children and young people

Organisations were also asked to report on how they provide feedback to children and young people about their complaint.

Most organisations reported providing children and young people with an outcome using the method of communication of the original complaint. Some organisations went a step further to provide children and young people with an option for how they would like to receive feedback on their complaint, whether via email, in writing, in person, social media, or by phone.

Only two organisations advised their feedback is provided to children and young people in 'age-appropriate' language.

There was evidence of good practice reported by several organisations, including:

- Providing children and young people with an outcome letter in age-appropriate language
- Providing ongoing updates to children and young people throughout the investigation process
- Asking children and young people about their preferred communication methods
- Asking children and young people whether they would like to receive updates during the investigation process
- Providing feedback to children and young people through supported face to face meetings
- Providing timely feedback to children and young people, including prompt initial response and final resolution timeframes

Young people have emphasised the importance of knowing what happens after they make a complaint, not just receiving generic responses.



"It needs to be specifics and not just jargon. There's a lot of words, but not a lot of meaning."

Assisting children and young people to make complaints

A key component of National Principle Six is ensuring children and young people feel safe and supported to raise concerns or make complaints. This means that they know who to talk to if they are feeling unsafe and know what will happen (the complaints process). Complaints information must be accessible and developmentally appropriate for children and young people, and supports are available for children and young people who make a complaint.

Children and young people are often not provided with information about how to complain, confidentiality issues, their right to a remedy or resolution or what to expect when they complain.

For children and young people, confidentiality is important. Many children and young people expressed the fear and confusion they feel when dealing with authority figures and the lack of confidentiality they face, particularly amongst teachers and principals.

“Knowing that it’s anonymous – because if I tell someone something I don’t want shared, if might get [back] to the person.”

“If I tell someone something, I don’t want it shared with others unless I agree.”

They also shared there is a lack of clear pathways for young people to voice concerns, especially when the complaint is about an authority figure.

“You might be scared to tell someone because there might be an overreaction. They might share the story with a teacher or someone who then targets you.”

Supports provided to children and young people

Organisations were asked to report on three types of additional supports provided to children and young people to make a complaint.

Table 4: Types of support available to children and young people (by organisation)

Type of support available	% of organisations who offer this support
Engaging an interpreter	53%
Advocate involved	47%
Support person provided	47%

A young person shared that complaints systems are often **“not adaptive or supportive enough for being a young person (talking to older, unapproachable in unsure methods)”**.

“Providing multiple forms of reporting and ensuring a dedicated person to contact and be approachable for a young person, and informing the complainant either before or during the process of the steps taken and actions that will be done.”

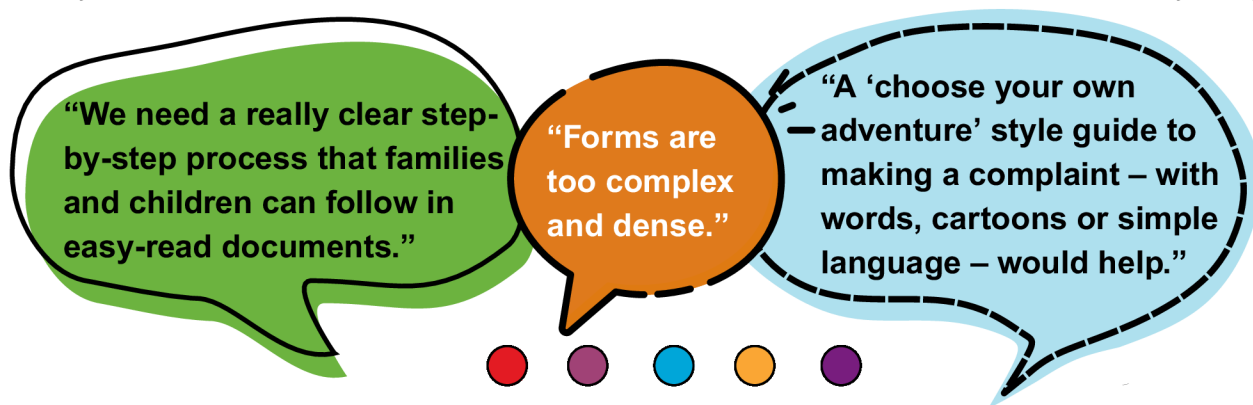
There was evidence of good practice reported by several organisations, including:

- Staff taking a relational approach ensuring young people feel included, valued and safe to approach staff with feedback or complaints
- Children and young people having the right to be represented and supported by a third person (such as a family member, friend, counsellor or other professional support person) at all stages of the complaints process
- Staff members having the appropriate skills and experience to provide individualised support to a child or young person making a complaint
- Providing an accessible child-friendly easy-to-read version of complaints handling policy and procedures for children, young people and families
- Providing one point-of-contact for all children and young people to raise concerns (e.g. a caseworker)
- Developing child-friendly complaints websites, resources, online complaint forms, and feedback forms
- Ensuring a culturally safe environment for children and young people, where they feel safe and heard
- Using picture cards or drawings to assist children and young people in raising a concern or making a complaint
- Ensuring senior officers are assigned to the complaint and that the case officer managing the complaint remains the same throughout the process
- Treating children and young people with additional sensitivity
- Prioritising or escalating complaints made by children and young people

Child-friendly information and resources

Only 45 per cent of organisations reported having information and resources about complaints processes for children and young people that are age and developmentally appropriate.

It is concerning that more than half of organisations (20 out of 38) reported not having child-friendly information and resources about complaints processes for children and young people.



Promotion of complaints processes

Child-friendly complaints processes should be visible, accessible, and promoted where children and young people live, learn, work, and play. Children and young people must understand what they can complain about, where to go to make a complaint and how to do so, without fear of consequences. Organisations should support and encourage children and young people to raise their concerns.

Engagement and communication strategies should be dynamic, responsive, and continuously informed by children and young people. This includes the promotion of child-friendly complaints systems to children and young people.

The St. Andrew's Hostel Inquiry provided recommendations for having a visible and accessible child-focused complaints system. These included:

- Developing multiple avenues for raising complaints, using a variety of modern technologies and modalities including texting, email and web presence
- Providing interaction and a 'face to a name' for complaints so that the child or young person can have confidence in the process
- Promoting disclosure of complaints through appropriate and diverse avenues including using technology and social media

Young people have shared with the Commissioner that having a child-friendly accessible website and social media are important for engagement.^{xiii}

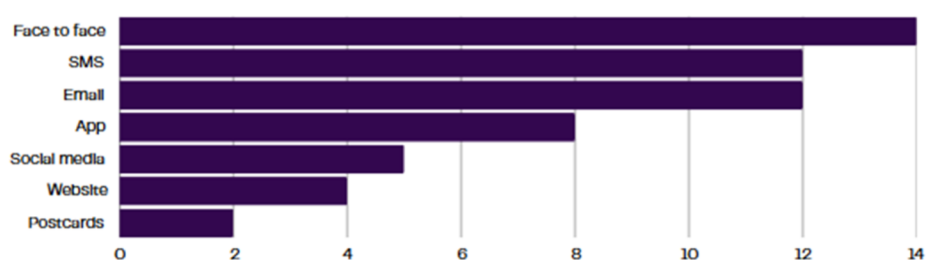
Organisations were also asked to report on how they promote their child-friendly complaints systems to children and young people. Many organisations indicated they promote their complaints systems in person through face-to-face experiences and educational programs. However, only 20 organisations promoted their child-friendly complaints systems to children and young people through their website, and only five used social media pages.

Organisations shared ways in which they promoted their child-friendly complaints systems to children and young people, including:

- Child-friendly webpage
- Child-friendly policy and information sheet
- Child-friendly feedback forms and comments cards
- QR codes and posters displayed publicly
- Child-friendly comic strips



Graph 3: Methods of Promoting Complaints Systems to Children and Young People



Complaint management systems and processes

Timeframes for responding to children and young people

Complaints should be acknowledged at the time of receipt or as soon as possible. Children and young people may be hesitant to raise their concerns, so it is important to reassure them immediately that they are being heard.

Some organisations made a distinction between the timeframe for initially acknowledging the complaint and a timeframe for resolution of the complaint.

Acknowledgment on initial receipt of a complaint varied from two to five working days. Timeframes for the resolution of complaints varied from two days to 90 days, with most organisations reporting that resolution would take place within 30 working days.

Some organisations distinguished timeframes for minor and complex complaints, or standard and urgent complaints. Only one organisation categorised complaints by children and young people as a higher priority, with those complaints escalated immediately.

“When I don’t have a record of my complaint, no matter which organisation, a lot of the time that complaint will go missing like it was never made. [I] used to be a verbal complainer until they went nowhere”

“A lot of complaints processes take a really long time. It’s exhausting when just getting basic support already takes forever”



Involving children and young people

Engaging children and young people in designing, implementing, and improving child-friendly complaints systems upholds their right to be heard and involved in decisions affecting them.

Only 16 per cent of organisations involved children and young people in the design, implementation and ongoing improvement of their complaints handling systems.

There was also evidence of good practice reported by several organisations. Examples included:

- Department of Communities reported hosting young people as interns to review and update their Complaints Management Policy for Children and Young People and review their child-friendly complaints process.
- Department of Fire and Emergency Services reported consulting with young people in the drafting phase of the development of a Children and Young Peoples Complaint Policy. Feedback was also considered in the final version.
- Department of Local Government, Sport and Cultural Industries (DLGSC) conducted extensive consultation with young people, holding six consultation sessions with 31 members across eight different local government youth advisory groups. Participants, aged seven to 24 years, provided feedback on a draft child-focused complaints web page, easy-read complaints policy and procedure documents, and awareness raising posters, and shared their views on how they would raise a complaint about their safety.
- Child and Adolescent Health Service involved their Youth Advisory Group in a recent complaints management improvement project and involve young people in a Consumer Working Group.
- Indigo Junction incorporated feedback received from young people at consultation into their complaints policies and procedures.

Use of resources in the development of complaints handling policy

It was pleasing to see that most organisations had used the available child-focused complaints resources in the development of their complaints handling policies and systems.

- 61 per cent used the Commissioner for Children and Young People's Child Friendly Complaints Guidelines
- 55 per cent used the National Principles for Child Safe Organisations
- 47 per cent used the 'Speak up and make a complaint' resources developed by the Commissioner for Children and Young People and the National Office for Child Safety

Most organisations rated as meeting or exceeding requirements for a child-focused complaints handling system had used all three resources to guide the design, implementation and ongoing improvement of their systems. In contrast, those rated at a starting point or developing were less likely to have used the resources.

An extensive list of resources used by agencies and organisations in developing child-focused complaints systems is available in Appendix F.

Child-focused complaints handling policy

The Commissioner's evaluation showed that only 37 per cent of organisations have taken an intentional approach in developing child-focused complaints handling policies and processes.

Sixty per cent of organisations provided evidence indicating that they had explicitly identified 'children and young people' as potential complainants in their complaints handling policies and processes. For many organisations this was as far as their policies progressed towards child-focused complaints processes.

While there has been considerable progress from some organisations since 2021, most organisations have significant work to do to align their child-focused complaints processes with National Principle Six.

Several organisations, particularly those who work directly with children and young people, demonstrated strong performance in developing a child-focused complaints handling policy. Policies that demonstrated a clear consideration of the needs of children and young people in making complaints and adapted their mechanisms accordingly were rated highly.

Strong complaints policies:

- Clearly outlined various ways for providing children and young people with support and assistance to make a complaint
- Clearly defined roles and responsibilities of leadership and staff throughout the complaints process
- Designated oversight of all complaints made by children and young people to senior leadership

Some organisations had a dedicated section within their complaints handling policy addressing complaints made by children and young people. Other organisations had a specific child-focused complaints handling policy separate from their overarching complaints handling policy.

DGLSC had developed an 'easy-read' complaints handling policy procedure in child-friendly language that explains the steps taken when a complaint is received concerning a child or young person.

There was further evidence of good practice reported by several organisations, including:

- Having a publicly available complaints handling policy in child-friendly and easy-to-read language
- Clearly explaining how the complaints process is adapted for children and young people and the supports available, including interpreters, options for information to be provided in a different way, or advocates
- Outlining the range and types of complaints that children and young people can make
- Providing clear oversight of all complaints made by children and young people and analysis of any systems issues within an organisation

- Clearly outlining the roles and responsibilities of leadership, staff, and volunteers in relation to complaints made by children and young people
- Clearly committing to child safety and wellbeing, including the development and implementation of a child safe policy

Child Wellness and Safety Policy

Thirty-nine per cent of organisations could not provide evidence of child safety, reportable conduct or similar policies addressing their process for reporting concerns for children and young people, and for managing mandatory reporting. This is an alarming finding, considering 89 per cent of organisations reported working with children and young people in some capacity.

The remaining organisations provided sufficient information and had processes in place to address child wellness and safety concerns. Most of these organisations had a clear statement of commitment in their policies that outlines the safety and wellbeing of children and young people as a key priority.



Information for children and young people

It is important to speak up and raise concerns

Your voice is important. When you share your thoughts, you're helping to make things better for yourself and others!

You should always have a say in how things are done, and the people looking after you should listen to what you think and feel. You know what's best for you – whether it's about school, spending time with friends, going to the doctor, or getting help with a problem.

It's okay to speak up if something isn't right or if you have ideas about how things could be better. If something isn't working, or you feel unsafe or uncomfortable, or someone has hurt you, it's important to tell someone.

You should always feel safe and comfortable sharing your thoughts, whether it's kind words, suggestion, feedback or a complaint. The support you receive should meet your needs, respect your individuality, and support your rights.

You're the expert about your life and know what works best for you – especially when it comes to school, education, health, and mental health. You have the right to be heard in decisions that affect you. No one is allowed to treat you unfairly just because you speak up. If that happens, let someone you trust know, and they will take it seriously.

If you need to make a complaint or share your thoughts, the people who help you should make it easy for you to do so. They should:

- Listen to what you say and take it seriously
- Let you share your thoughts however you feel comfortable – talking, writing or any other way you need
- Be happy to hear good and not-so-good feedback so they can make things better for you and others
- Let you know what they will do next and when they will follow up with you
- Try to fix any problems as quickly as they can



It's not always easy to speak up, especially if you feel unsure or nervous. If you find it hard to raise concerns by yourself, your family, friends, or others who care about you can help. They can share your concerns for you or support you to raise a complaint yourself.

Having someone speak up for you, or support you to speak up for yourself, can make a big difference. Sometimes, other people might notice things you didn't.

Raising complaints is an important part of making sure things are working well for you. We are working with organisations and agencies to make it easier for children and young people to make a complaint.

If you are having problems raising a complaint with a government agency, you can go to the Ombudsman. The Ombudsman is a person who works to help make sure things are fair. They do not take sides and are not part of the government. The Ombudsman listens to and solves problems when people, including children and young people, have complaints about government agencies (such as the Department of Education), local councils, or universities.

The Commissioner for Children and Young People is here to help. The Commissioner can't get involved in individual complaints about other organisations but she and her team will try their best to find someone who can help you.



Information for organisations and agencies

Defining a ‘complaint’

The way complaints are defined and identified varies between children and adults. Establishing a child-friendly complaint system begins with understanding these differences and creating mechanisms that support the needs of children and young people when handling complaints.

For adults, a complaint typically involves a formal, often written, statement explaining why they feel their rights have been violated and who they believe is responsible.

For children and young people, complaints are usually less formal, may not be written, and are often expressed indirectly. They could take the form of a phone call, a face-to-face conversation, an email, message via a social media platform, or may be expressed indirectly through a question or general comment. Sometimes these casual questions or comments may be part of a bigger problem and should be treated as a potential complaint.

Children and young people often express their worries by asking questions “on behalf of someone else” or speaking in general terms, rather than directly saying, “I have a problem.” These questions can sometimes be a way of seeking help.

Agencies and organisations have a duty to identify these as potential complaints and ensure they have the right processes to handle them. This includes creating effective systems to track and manage each complaint.

It is important to:

- Address any concern raised by a child or young person as if it could be a complaint and take appropriate action
- Recognise the complaint system as a valuable resource for understanding children’s everyday experiences and consider evaluating how well the system upholds and protects their rights
- Leverage the complaint system as a powerful tool for advocacy and effective communication

Children and young people have expressed that the word ‘complaint’ often has negative connotations and have suggested using alternative phrasing such as “I want to voice out”, “speak up” or provide “feedback” to make the process feel less intimidating. Other children and young people have pointed out that ‘complaints’ is a recognised formal process, so any new terminology should still ensure that issues are taken seriously.

Encourage discussions about complaints from children and young people within your organisation

To support meaningful discussion, consider these questions:

- What trends emerge from our complaints data from children and young people?
- Are there identifiable patterns that emerge over time?
- Do we communicate complaints data and trends with our executive board, advisory groups, staff, children, young people or families?
- What changes or improvements have we implemented based on the complaints or feedback received from children and young people?

Developing a child-focused complaints system

Consider how your organisation can strengthen its long-term capability to support children and young people effectively.

● Put children and young people at the centre

Align decisions, services and complaints processes with the needs of children and young people. Involve children and young people in the design, implementation and evaluation of your complaints systems to provide valuable perspectives and ensure you are meeting their needs.

● Foster trust through open, honest and transparent communication

When children, young people, or their families raise concerns, you should always respond with clear, honest explanations, and planned steps to address the issue. Maintaining open communication throughout the complaints process is important in fostering trust with children and young people.

● Encourage positive outcomes and continuous improvement

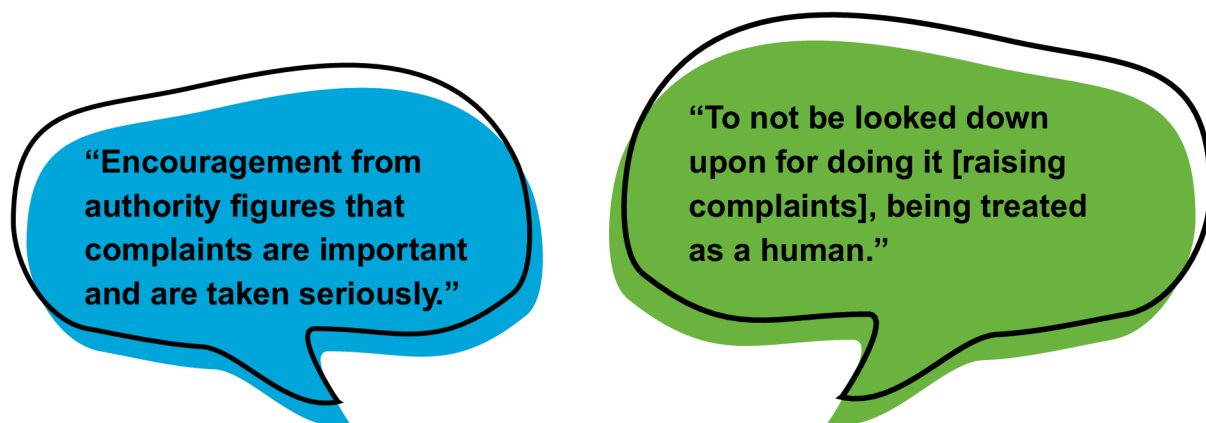
Ensure complaints policies and procedures support a culture of respect for children and young people, and incorporate best practice principles. Regularly review, evaluate and refine complaints processes, involving children and young people, to adapt and improve practices. Highlight positive outcomes achieved through complaints resolution and regularly collect feedback from children and young people.

● Use data to improve programs and services for children and young people

Complaints and feedback offer important insights for organisations and agencies. They reflect the experiences of children, young people, and their families. By analysing this data, you can identify areas for improvement, build trust with children and young people, and take meaningful steps to improve services and promote positive outcomes.

● Foster a positive organisational culture

Organisations that have strong child-focused complaints systems prioritise children and young people and consistently treat them with dignity and respect. Model strong leadership and accountability in placing children and young people in the centre of decision-making.



Next steps for the Commissioner

The Commissioner will continue to support organisations and agencies across Western Australia to improve their child-friendly complaints mechanisms by:

- Providing this report to the Directors General or Commissioners of all participating agencies, and to the Chief Executive Officers of local governments and non-government organisations.
- Consulting with agencies and organisations individually on their progress in developing child-friendly complaints mechanisms and providing individual feedback.
- Reviewing the Commissioner's complaints resources, including providing best practice case studies and examples of good practice to provide further guidance to agencies and organisations.
- Pending implementation of a Model of Independent Oversight of Child Safe Organisations, continue to provide support to agencies and organisations in implementing child friendly complaints systems in alignment with National Principle Six: Processes to respond to complaints and concerns are child focused.
- Reviewing the 2024 Complaints Monitoring process to enhance future monitoring processes.
- Reviewing the implementation of key recommendations by organisations and agencies in the next round of Complaints Monitoring in 2026.
- Advise funding agencies of the outcomes for non-government and Aboriginal Community Controlled Organisations from the complaints monitoring process. This includes advising which organisations did not provide information.

Definitions

Organisation

For the purposes of this report, the term 'organisation' will be used when referring to all agencies, local governments and non-government organisations engaged in this process. A full list of the government agencies, local governments and non-government organisations is available in Appendix C.



Appendix A: Module One Survey Questions

Module One: Agency user demographics and complaints data (2024)

Agency engagement with children and young people

1. Does your agency/organisation work with children and young people, **either directly or indirectly**?
2. Which of the following options explains how your agency works with children and young people:
 - Works with children and young people as the core business
 - Has a specific section that works with children and young people
 - Works with the community in general, including children and young people
 - Contracts, or otherwise funds, an external organisation or body to provide services for children and young people
 - Is contracted, or under another arrangement, to provide services for, or on behalf of a government agency for children and young people
 - Please explain how your agency/organisation works, either directly or indirectly, with children and young people.

The following questions refer to complaints made **directly** by children and young people.

Complaints made on behalf of children and young people

3. 0-5 years: How many complaints did your agency receive on behalf of children and young people in this age range, in 2023?
4. 6-11 years: How many complaints did your agency receive on behalf of children and young people in this age range, in 2023?
5. 12-17 years: How many complaints did your agency receive on behalf of children and young people in this age range, in 2023?
6. In total, how many complaints did your agency receive on behalf of children and young people in the 2023 calendar year?
7. Would you like to provide any further comments around complaints received on behalf of children and young people?

Complaints made directly by children and young people

8. 0-5 years: How many complaints did your agency receive directly from children and young people in this age range, in 2023?
9. 6-11 years: How many complaints did your agency receive directly from children and young people in this age range, in 2023?
10. 12-17 years: How many complaints did your agency receive directly from children and young people in this age range, in 2023?
11. In total, how many complaints did your agency receive directly from children and young people in the 2023 calendar year?
12. Would you like to provide any further comments around complaints received directly from children and young people?

Source of Complaint: 0-5 years

13. Did your agency receive any complaints from children in the 0-5 years age range, for the 2023 calendar year?
14. How many complaints did your agency receive in person from children in the 0-5 years age range in person, by phone, via online form, by email, by social media, other?
15. Would you like to specify any other ways in which complaints were made by children and young people in the 0-5 years age group?
16. Would you like to provide any comments about complaints received directly from children in the 0-5 years age range?

Source of Complaint: 6-11 years

17. Did your agency receive any complaints from children in the 6-11 years age range, for the 2023 calendar year?
18. How many complaints did your agency receive in person from children in the 6-11 years age range in person, by phone, via online form, by email, by social media, other?
19. Would you like to specify any other ways in which complaints were made by children and young people in the 6-11 years age group?
20. Would you like to provide any comments about complaints received directly from children in the 6-11 years age range?

Source of Complaint: 12-17 years

21. Did your agency receive any complaints from children in the 12-17 years age range, for the 2023 calendar year?
22. How many complaints did your agency receive in person from children in the 12-17 years age range in person, by phone, via online form, by email, by social media, other?
23. Would you like to specify any other ways in which complaints were made by children and young people in the 12-17 years age group?
24. Would you like to provide any comments about complaints received directly from children in the 12-17 years age range?

Complaint information and outcomes

25. Of the complaints received for the 2023 calendar year, what were the complaints about? List the main issues in the text box below.
26. Of the complaints received, how many complaints identified a concern raised by a child or young person about another child or young person's behaviour or conduct?
27. Of the complaints received, how many complaints are about an employee or volunteer of the agency?
28. How many complaints were referred to another agency or organization?
29. What were the outcomes of the complaints?
30. Would you like to specify any other outcomes of the complaints?
31. Do you have information and resources about your complaints processes for children and young people that is age and developmentally appropriate?
32. How do you promote your child-friendly complaints systems to children and young people? Face to face? SMS? Email? Postcards? App? Social media? Website?

33. Would you like to specify any other ways in which you promote your child-friendly complaints system to children and young people?
34. How are children and young people involved and provided feedback about their complaint?
35. What additional supports do you provide to children and young people to assist them in making the complaint: Engaging an interpreter? Advocate involved? Support person involved?
36. Would you like to specify any additional supports you provide to children and young people to assist them in making a complaint?
37. Did your agency use any of the following resources in the development of your complaints handling policy and system?
- CCYP Child Friendly Complaints Guidelines?
 - National Principles of Child Safe Organisations?
 - National Office for Child Safety Speak up and make a complaint resources?
38. Would you like to specify any other resources your agency may have used in the development of your complaints handling policy and system?
39. What positive practices have you implemented to make your complaints processes more child friendly? What actions is your agency taking to improve the child-friendliness of your complaints system?
40. Do you report complaints data to your Executive Board? If so, at what frequency do you report?

Complaint management systems and processes

41. What is your agency's specified timeframe for responding to complaints by children and young people (as per your Complaints Handling Policy)
42. Does your agency have a data management system to document all complaints made by children and young people?
43. Are children and young people involved in the design, implementation, and ongoing improvement of your agency's complaints handling systems?

Evidence documents

Each agency/organisation is required to submit the following documentation:

- Complaints Handling Policy
- Code of Conduct
- Child Safe Policy
- Any Child-friendly Complaints Publications
- Any additional evidence of positive practices implemented e.g. complaints processes informed by the voices of children and young people; de-identified case studies that illustrate child-friendly and focused processes.

Appendix B: Evaluation Framework

National Principle Six

Processes to respond to complaints and concerns are child focused

Action Area 6.1	The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report
Action Area 6.2	Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe
Action Area 6.3	Complaints are taken seriously and responded to promptly and thoroughly
Action Area 6.4	Complaints and concerns are reported to relevant authorities, whether or not the law requires reporting
Action Area 6.5	Reporting, privacy and employment law obligations are met in policy and practice

Ratings

1 Starting Point	Clear gaps evidence
2 Developing	Some strengths with many areas for improvement
3 Meets requirements	Acceptable performance with potential for improvement
4 Strong	Good performance in virtually all aspects; no weaknesses of any real consequence

Appendix C: List of Organisations Invited to Participate

- Art Gallery of WA
- Central Regional TAFE
- Chief Psychiatrist of Western Australia
- Children's Court of WA
- City of Vincent
- City of Greater Geraldton
- City of Mandurah
- Corruption and Crime Commission
- Department of Biodiversity, Conservation and Attractions
- Department of Communities
- Department of Education
- Department of Training and Workforce Development
- Department of Fire and Emergency Services
- Department of Jobs, Tourism, Science and Innovation
- Department of Justice
- Department of Local Government, Sport and Cultural Industries
- Department of Health - Child and Adolescent Health Service
- Department of Health WA
- Department of Health - East Metropolitan Health Service
- Department of Health - North Metropolitan Health Service
- Department of Health - PathWest
- Department of Health - South Metropolitan Health Service
- Department of Health - WA Country Health Service
- Department of Transport
- Department of Transport - Main Roads
- Department of Transport - Public Transport Authority
- Department of Planning, Lands and Heritage
- Family Court of WA
- Health and Disability Services Complaint Office (HaDSCO)
- Indigo Junction
- Legal Aid Western Australia
- Kimberley Development Commission
- Mental Health Commission
- North Metro TAFE
- North Regional TAFE
- Office of the Information Commissioner
- Ombudsman
- Parkerville
- State Library of Western Australia
- South Metropolitan TAFE
- South Regional TAFE
- Western Australia Police Force
- Western Australian Museum

Appendix D: National Principles for Child Safe Organisations

National Principles for Child Safe Organisations

- 1.** Child safety and wellbeing is embedded in organisational leadership, governance and culture.
- 2.** Children and young people are informed about their rights, participate in decisions affecting them and are taken seriously.
- 3.** Families and communities are informed and involved in promoting child safety and wellbeing.
- 4.** Equity is upheld and diverse needs respected in policy and practice.
- 5.** People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.
- 6.** Processes to respond to complaints and concerns are child focused.
- 7.** Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.
- 8.** Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.
- 9.** Implementation of the national child safe principles is regularly reviewed and improved.
- 10.** Policies and procedures document how the organisation is safe for children and young people.

Appendix E: National Principle Six

Article 42 of the CRC: Children have the right to know their rights! Adults should know about these rights and help children learn about them, too.

Principle 6

Processes to respond to complaints and concerns are child focused.

This principle provides guidance on how human resource management policies and practices and effective complaints management processes should be accessible, responsive to and understood by children and young people, families, staff and volunteers. Complaint management processes will be linked to the Code of Conduct and provide details about where breaches of the Code have occurred. Training will help staff and volunteers to recognise and respond to neglect, grooming and other forms of harm, provide appropriate support to children and young people in these instances and meet legal requirements. This includes training to assist in responding to different types of complaints, privacy considerations, listening skills, disclosures of harm and reporting obligations.

Key action areas:

- 6.1 The organisation has an accessible, child focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers, approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.
- 6.2 Effective complaint handling processes are understood by children and young people, families, staff and volunteers, and are culturally safe.
- 6.3 Complaints are taken seriously, and responded to promptly and thoroughly.
- 6.4 The organisation has policies and procedures in place that address reporting of complaints and concerns to relevant authorities, whether or not the law requires reporting, and co-operates with law enforcement.
- 6.5 Reporting, privacy and employment law obligations are met.

Indicators that this principle is upheld:

- Staff and volunteers are well-informed about their roles and responsibilities, reporting and privacy obligations and processes for responding to disclosures. They feel empowered and supported to draw attention to breaches of the Code of Conduct within the organisation and to challenge these behaviours.
- The complaints handling policy prioritises the safety and wellbeing of children and young people and recognises the role of families and communities in understanding and using the policy.
- Policies and procedures demonstrate regard for fairness to all parties to a complaint or investigation including support and information as appropriate.
- Staff and volunteers have a good knowledge of the different ways children and young people express concerns or distress and disclose harm.
- Information about all complaints and concerns, including breaches of relevant policies or the Code of Conduct, is recorded and analysed, including in relation to processes, timeframes and record keeping practices. Systemic issues are identified and mitigated through this process.
- Children and young people know who to talk to if they are feeling unsafe and know what will happen.
- Timely feedback is provided to children and young people, families, staff and volunteers who raise concerns or complaints. This includes reporting back on incidents, concerns and complaints.

Appendix F: Complaints Resources List

- Standards Australia, 'Guidelines for complaints management in organisations (AS/NZS 10002: 2014', SAI Global, 2014.
- P Blaxell Inquiry Report, 'St Andrew's Hostel Katanning: How the system and society failed our children' 2012.
- Convention on the Rights of the Child (CRC) (1989).
- CREATE Foundation, 'Child-centred Complaints Handling: Best Practices Guide', 2015.
- UNICEF, 'National human rights institutions (NHRIs) Series: tools to support child-friendly practices', 2018.
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- Disability Discrimination Act 1992 (Cth).
- Human Rights and Equal Opportunity Commission Act 1986 (Cth).
- National Office for Child Safety, Complaints Handling Guide: Upholding the rights of children and young people, 2019.
- Ombudsman Western Australia, Reportable Conduct Scheme.
- Ombudsman Western Australia, Guidelines: Effective handling of complaints made to your organisation – an overview, 2020.
- Racial Discrimination Act 1975 (Cth).
- Royal Commission into Institutional Responses to Child Sexual Abuse, Final Report -Volume 7, 2017.
- Standards for Registered Training Organisations (RTOs) 2015.
- Equal Opportunity Act 1984 (WA).

References

- ⁱ Convention on the Rights of the Child (CRC) (1989).
- ⁱⁱ Standards Australia, 'Guidelines for complaints management in organisations (AS/NZS 10002:2014)', SAI Global, 2014.
- ⁱⁱⁱ Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report - Recommendations*, 2017.
- ^{iv} Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report - Recommendations*, 2017, Recommendation 6.4
- ^v Royal Commission into Institutional Responses to Child Sexual Abuse, *Final Report - Recommendations*, 2017, Recommendation 6.6
- ^{vi} P Blaxell, *St Andrew's Hostel Katanning: How the system and society failed our children*, WA Government, 2012, p. 289.
- ^{vii} P Blaxell, *St Andrew's Hostel Katanning: How the system and society failed our children*, WA Government, 2012.
- ^{viii} P Blaxell, *St Andrew's Hostel Katanning: How the system and society failed our children*, WA Government, 2012.
- ^{ix} Commissioner for Children and Young People, *National Principles for Child Safe Organisations WA: Guidelines*, 2019, Perth.
- ^x Australian Human Rights Commission, *National Principles for Child Safe Organisations*, 2018.
- ^{xi} Commonwealth of Australia, *The National Office for Child Safety, Complaint Handling Guide: Upholding the rights of children and young people*, 2019.
- ^{xii} Commonwealth of Australia, *The National Office for Child Safety, Complaint Handling Guide: Upholding the rights of children and young people*, 2019.
- ^{xiii} Commissioner for Children and Young People, *Final recommendations of the Youth Steering Group*, 2024, Perth.



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