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1. PURPOSE

1.1. The Complaints Handling Policy aims to offer a transparent, consistent and structured process to address concerns raised by the CRCA community, ensuring that voices are heard, valued and acted upon, and upholding the principles of justice, reconciliation and mutual respect.

1.2. This policy supports child-focused, accessible and culturally safe complaint pathways, so that children, young people, adults at risk, families, members, personnel and other participants can raise concerns in ways that are safe and appropriate to their circumstances.

2. BIBLICAL AND THEOLOGICAL BASIS

2.1. Proverbs 31:8-9 calls God's people to speak up for those who cannot speak for themselves. This policy gives practical expression to that calling by providing safe and accessible pathways for concerns to be raised and heard.

2.2. Micah 6:8 calls God's people to act justly, love mercy and walk humbly with God. Complaint handling must therefore pursue justice, mercy, truthfulness, dignity and protection for all involved.

3. SCOPE

3.1. This policy applies to all members, pastors, elders, office bearers, staff, volunteers, contractors, Safe Church Representatives, and any person participating in CRCA activities, events, ministries and services.

3.2. The complaint pathways in this policy are available to children, young people, adults at risk, families, members, personnel, visitors and other persons who raise safeguarding concerns, disclosures, complaints, allegations, or concerns about conduct within the CRCA context.

4. VALUES

4.1. The CRCA is committed to the following values so that the safety and well-being of all people remain at the forefront of decisions and actions.

4.1.1. **Scriptural teachings - upholding safety and dignity:** central to the Church's teaching is the call to embody love, mercy and justice. Colossians 3:17 calls all things to be done in the name of the Lord Jesus, and Luke 18:16 shows Jesus welcoming children and affirming their place in the kingdom. The responsibilities in this policy are therefore carried out in a way that honours the dignity, voice and safety of each person.

4.1.2. **Zero tolerance:** the CRCA has a zero-tolerance approach to abuse and harmful behaviour. The responsibilities in this policy must never be used to suppress, minimise or ignore concerns about safety, harm or abuse.

4.1.3. **Transparency and accountability:** the CRCA fosters a culture of openness, appropriate information sharing, feedback and accountable action.

4.1.4. **Shared responsibility:** safeguarding is everybody's responsibility and requires the participation of local churches, personnel, members and denominational safeguarding structures.

4.1.5. **Empowerment:** the CRCA supports people to understand their rights, speak up, raise concerns and contribute to the development of safer church environments.

4.1.6. **Integrity:** the CRCA fosters honest, ethical and respectful engagement at all levels of church life.

5. DEFINITIONS

5.1. Terms defined in the National Safeguarding Policy apply to this policy unless this section gives a more specific operational meaning.

5.2. **Complaint** means an expression of concern, dissatisfaction, allegation or grievance about conduct, safeguarding practice, policy implementation, decision-making, response, omission or treatment in a CRCA context.

5.3. **Complainant** means the person who makes a complaint, or on whose behalf a complaint is made.

5.4. **Respondent** means the person, role, body or entity whose conduct, decision, action or omission is the subject of a complaint.

5.5. **Safeguarding complaint** means a complaint that raises or may raise a safeguarding concern, including abuse, harm, risk of harm, unsafe conduct, boundary breach, failure to protect, retaliation or inappropriate response.

5.6. **Appeal or review** means a process for reconsidering a safeguarding finding, process, recommendation or action within the authority of the body conducting the review.

5.7. **Delegated safeguarding authority** means the authority expressly given to SCAC, SCU or another CRCA role to review, recommend or act on safeguarding matters within defined limits.

5.8. **Jurisdictional limitation** means a boundary showing that SCAC, SCU or another reviewer cannot amend, overturn or substitute a decision reserved to a Session / Church Council, Classis, Synod, employer, statutory authority, regulator, court, tribunal or other authorised decision-maker.

5.9. **Outcome** means the recorded result of a complaint, appeal or review, including any safeguarding action, recommendation, referral, support, corrective action or jurisdictional referral.

5.10. **Malicious complaint** means a complaint knowingly made with false information or improper purpose. A complaint is not malicious merely because it is not substantiated.

5.11. **Procedural fairness** means a fair process that provides notice of the matter, an opportunity to respond, impartial consideration, support where appropriate, and a decision or recommendation made within authority.

6. POLICY

6.1. **Commitment:** the CRCA is committed to listening and responding to complaints in a timely, fair and respectful manner.

6.2. **Transparency:** every complaint is handled through a clear process that gives the complainant, the respondent and relevant decision makers an appropriate understanding of the pathway being followed.

6.3. **Confidentiality and its limits:** complaints are treated confidentially, subject to lawful information-sharing, mandatory reporting, Reportable Conduct Scheme notification, Police direction, privacy and safeguarding obligations.

6.4. **Non-retaliation:** no person is to suffer retaliation, disadvantage or discrimination because they make a complaint in good faith or participate in a complaint process.

6.5. **Child-focused and accessible pathways:** children, young people and adults at risk may raise concerns in age-appropriate and accessible ways, including through a trusted adult, parent, support person, church worker, local church leadership, the Safe Church Representative, or the Safe Church Unit where denominational safeguarding support or escalation is required.

6.6. **Parallel statutory obligations:** acknowledging or internally handling a complaint does not delay or replace mandatory reporting, Reportable Conduct Scheme notification, Police reporting, notifiable data breach assessment, or other statutory obligations where a relevant threshold is met.

6.7. **Cultural safety and accessibility:** complaint handling is to be culturally safe and accessible for Aboriginal and Torres Strait Islander peoples, people from culturally and linguistically diverse backgrounds, people with disability, neurodiverse people, people who use English as an additional language, and any person who faces barriers to making a complaint.

7. PROCEDURES

7.1. **Lodging a complaint:** a complaint may be raised in writing, by email, verbally, in person, or through supported communication. Complaints may be raised with local church leadership, the Safe Church Representative, or the Safe Church Unit where denominational safeguarding support, triage or escalation is required. If a person is at immediate risk, Police or emergency services should be contacted first.

7.2. **Child-focused complaint methods:** children and young people may raise a concern themselves or through a trusted adult, parent, support person or church worker. The person receiving the concern supports the child, young person or adult at risk to describe the matter where assistance is needed, without asking leading questions or attempting to investigate at intake.

7.3. **Intake practice:** the person receiving a complaint or disclosure listens with care, patience and empathy; records the person's own words where possible; uses neutral language such as "alleged" and "reported" in any record made; notes the date, time, location, who was present and what was said; explains the limits of confidentiality; asks what support would be helpful; and explains next steps as clearly as possible.

7.4. **Intake limits:** the person receiving a complaint or disclosure does not promise confidentiality, does not investigate, does not ask leading questions, does not contact the alleged respondent at intake, does not delay mandatory reporting or internal escalation, and does not store complaint records on personal devices or unsecured channels.

7.5. **Acknowledgement:** where a complaint is raised locally, the responsible local church leadership acknowledges receipt within three working days where contact details are available. The Safe Church Representative may assist with local acknowledgement and referral where authorised by the Session / Church Council. Internal acknowledgement does not delay any statutory notification or reporting requirement that must occur on a separate timeframe.

7.6. **Initial assessment:** where a complaint is raised locally, the Session / Church Council or delegated local authority makes an initial assessment, with support from the Safe Church Representative and, where appropriate, advice or triage assistance from the Safe Church Unit. The assessment considers whether criminal conduct is alleged or suspected; whether Police must be contacted as a priority; whether a Reportable Conduct Scheme threshold may be met; whether mandatory reporting obligations are engaged; whether immediate safety steps or precautionary measures are required; and whether the matter proceeds under this policy, the Disciplinary and Breach Response Policy, or another pathway.

7.7. **Assessment and investigation:** where investigation is required, an investigator or team is appointed. External safeguarding professionals may be engaged where the matter is complex, high risk, conflicted, requires independent expertise, or concerns a complaint made against a senior leader. Evidence gathering and interviewing are conducted with regard to the rights, dignity, safety and well-being of those involved.

7.8. **Confidentiality during assessment and investigation:** confidentiality is maintained subject to the limits set out in this policy, the Information Sharing and Record Keeping Policy, statutory reporting obligations, Reportable Conduct Scheme obligations, Police requirements and lawful information-sharing pathways.

7.9. **Accessibility and support:** reasonable adjustments may include interpreters, advocates, accessible formats, alternative intake channels, support persons and age-appropriate communication. Local churches seek to make the process understandable and accessible to the person making the complaint. The Safe Church Administrator may provide approved accessible-format resources, and the Safe Church Unit may provide safeguarding response advice where escalation, triage or denominational support is required.

7.10. **Cultural safety:** where a complaint, engagement or pastoral matter concerns Aboriginal or Torres Strait Islander children, young people or families, local churches consider whether consultation with

appropriate Aboriginal community-controlled organisations or cultural authorities is needed, with safeguarding advice or escalation support from the Safe Church Unit where appropriate. The same posture of respect and cultural safety applies to children and families from culturally and linguistically diverse backgrounds.

7.11. **Resolution:** the investigation or review process produces findings and recommended actions. The complainant and the respondent are informed of the outcome as appropriate, subject to privacy, safety, confidentiality, statutory restrictions and the Information Sharing and Record Keeping Policy.

7.12. **Review and appeal:** where a party is not satisfied with the outcome, the review or appeal pathway in Appendix A may be used. Internal review does not override regulator findings and does not pause statutory notifications.

7.13. **Documentation and records:** complaint details, intake notes, assessment records, investigation records, decisions and outcomes are securely held in accordance with the Information Sharing and Record Keeping Policy and Privacy Policy. Safeguarding complaint records are retained for at least 45 years from the date of the last action on the file, or longer where law or regulator direction requires. Access is restricted to people with a defined role-based need.

7.14. **Complaints Intake Practice Guide:** the Safe Church Administrator maintains a practical Complaints Intake Practice Guide under the oversight of the Safe Church Advisory Committee. The guide supports consistent complaint intake but does not replace the requirements of this policy.

8. ROLES AND RESPONSIBILITIES

8.1. Role definitions used in this policy are consistent across the CRCA policy suite.

8.2. **Session / Church Council:** ensures this policy is implemented locally; supports access to complaint pathways; manages local conflict-of-interest considerations; and remains accountable for local governance action where a complaint or safeguarding concern is raised locally.

8.3. **Safe Church Representative:** acts as the local safeguarding contact; receives or assists with complaints locally where appropriate; helps people access complaint pathways; and refers matters through the relevant CRCA safeguarding pathways.

8.4. **Safe Church Administrator:** maintains approved complaint forms, templates, intake resources, records-management tools, accessible-format materials, training records and administrative resources that support consistent complaint handling across the CRCA safeguarding framework.

8.5. **Safe Church Unit:** provides safeguarding response support, triage assistance, advice on response pathways, and escalation support where complaints raise safeguarding concerns, statutory reporting issues, Reportable Conduct Scheme matters, Police matters, privacy issues or other denominational safeguarding risks. The Safe Church Unit supports, but does not replace, local church governance responsibility.

8.6. **Safe Church Advisory Committee:** provides oversight, high-risk review, and review or appeal functions where given by this policy and where the matter falls within delegated safeguarding authority; considers high-risk or complex matters; engages external experts where required; and monitors complaint trends through the Continuous Quality Improvement Policy. SCAC may make safeguarding recommendations to the relevant decision-maker but does not amend, overturn or substitute decisions reserved to a Session / Church Council, Classis, Synod, employer, statutory authority, regulator, court, tribunal or other legally authorised decision-maker.

8.7. **Investigator or investigation team:** conducts objective assessment, gathers evidence, interviews relevant parties, prepares findings and recommendations, and maintains confidentiality subject to lawful reporting and information-sharing requirements.

8.8. **Personnel and members:** understand the complaint pathways, report safeguarding concerns, cooperate with complaint processes, and act respectfully and without retaliation.

9. PROTECTION AGAINST MALICIOUS COMPLAINTS

9.1. The CRCA recognises the importance of safeguarding everyone, including people who may be falsely accused. A complaint that is not substantiated does not, of itself, mean that the complaint was malicious or made in bad faith.

9.2. A finding that a complaint was malicious requires a specific assessment of procedural fairness, evidence and intent. Where malicious intent is found, disciplinary action may be taken under the Disciplinary and Breach Response Policy, while care is taken not to discourage legitimate complaints or disclosures.

9.3. The CRCA seeks to respond to difficult matters with fairness, prayerful discernment, justice, love and restoration where appropriate.

10. PROTECTION AGAINST RETALIATION

10.1. Retaliation against a person who makes a complaint in good faith or participates in a complaint-handling process is prohibited.

10.2. A person who believes they have been subjected to retaliation may report it to local church leadership, the Safe Church Representative, or the Safe Church Unit where denominational safeguarding support or escalation is required.

11. BREACHES

11.1. Breach of this policy, including failure to report complaints, breach of confidentiality, retaliation, suppression of complaints, or misuse of the complaint process, may result in action under the Disciplinary and Breach Response Policy and, where applicable, the CRCA Church Order.

11.2. Where a breach engages a statutory threshold, including failure to disclose, failure to protect, failure to report, a Reportable Conduct Scheme threshold, a mandatory reporting obligation, a Police matter or another lawful reporting requirement, the statutory or scheme pathway operates in parallel with any internal disciplinary or governance process.

12. RELATED POLICIES

12.1. National Safeguarding Policy. Safeguarding Governance and Leadership Policy. Code of Conduct. Whistleblower Policy. Safe Environment and Risk Management Policy. Disciplinary and Breach Response Policy. HR / Recruitment Policy. Learning and Development Policy. Information Sharing and Record Keeping Policy. Privacy Policy. Continuous Quality Improvement Policy.

13. MONITORING AND REVIEW

13.1. This policy is reviewed every three years, or earlier where required by legislative change, regulator guidance, audit findings, serious incidents, a substantiated complaint, material safeguarding risk, or a decision of the Safe Church Advisory Committee. Feedback on this policy may be sent to the Safe Church Unit at scu@crca.org.au at any time.

14. APPENDIX A - APPEAL OR REVIEW OF FINDINGS

14.1. **Review authority and jurisdiction:** an appeal or review under this policy is limited to safeguarding findings, process, recommendations and actions that fall within the expressly delegated authority of the Safe Church Advisory Committee or Safe Church Unit. Nothing in this policy authorises SCAC or SCU to amend, overturn or substitute a decision reserved to a Session / Church Council, Classis, Synod, employer, statutory authority, regulator, court, tribunal or other legally authorised decision-maker. Where a review concerns a decision reserved to one of those bodies, the matter must be referred to the applicable Church Order, employment, statutory or legal pathway. SCAC may make safeguarding recommendations to the relevant decision-maker and may review whether CRCA safeguarding process, information sharing, referral, support and escalation obligations have been followed.

14.2. **Timeframes:** appeals should be lodged within 30 days of the initial findings. No appeal may be lodged more than three months after the initial findings, unless extraordinary circumstances are accepted by the Safe Church Advisory Committee.

14.3. **Grounds for appeal:** procedural irregularity, new evidence, disproportionate outcome, bias, prejudice, conflict of interest, or another ground accepted by the Safe Church Advisory Committee.

14.4. **Process:** the appeal may involve review of records, consideration of new evidence, response from the relevant parties, and advice from external counsel or specialists where appropriate.

14.5. **Outcomes:** if an appeal concerns a safeguarding decision within SCAC's delegated authority, SCAC may confirm the finding, vary the safeguarding recommendation, request further assessment, or refer the matter to the appropriate decision-maker. If the matter concerns a reserved decision, SCAC may record safeguarding recommendations and refer the matter to the authorised pathway, but must not amend, overturn or substitute the reserved decision. SCAC must record the basis for the outcome, any jurisdictional limitation, and the pathway used.

14.6. **Records:** appeal records are maintained in accordance with the Information Sharing and Record Keeping Policy.

External framework reference: National Principles for Child Safe Organisations.

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0.1	16/09/2025	16/09/2025	Not approved	Align Safeguarding	Initial consultation draft.
0.2	09/07/2026	09/07/2026	SCAC	Align Safeguarding	Statuary updates
0.3	28/07/2026	28/07/2026	SCAC (SIC)	Align Safeguarding	SCAC feedback
1.0	16/09/2026	16/09/2026	SCAC (SIC)	Align Safeguarding	First approved issue.