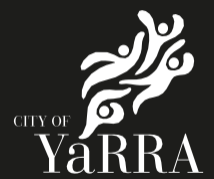


EXTERNAL

Child Safe Complaints Policy

2026



Yarra City Council acknowledges the Wurundjeri Woi Wurrung people as the Traditional Owners and true sovereigns of the land now known as Yarra. We also acknowledge the significant contributions made by other Aboriginal and Torres Strait Islander people to life in Yarra. We pay our respects to Elders from all nations and to their Elders past, present and future.

Document Details

Title:	Child Safe Complaints Policy
Type:	Policy
Description:	This policy outlines Council's approach to handling child safe complaints to support transparency, consistency and accountability.
Content Manager Ref:	D26/33840
Audience:	External
Approval Authority:	Council
Responsible Branch:	People and Culture
Document Owner:	Senior Advisor Workforce Equity and Inclusion (Child Safety)
Human Rights Compatibility	This Policy has been assessed and is compatible with the Victorian Charter of Human Rights Responsibilities. The United Nations Convention on the Rights of the Child (CROC) has also been considered in developing this policy.
Approval Date:	[10/08/2026]
Review Date:	[10/08/2028]
Version:	1

1. Purpose

The purpose of this policy is to clearly outline the principles and procedures for handling child safe complaints at Yarra City Council. It ensures that child safety concerns are addressed promptly, thoroughly and in a child-focused manner.

This policy should be read in conjunction with Yarra's Customer Complaints Policy; Children's Services Dealing with Complaints Policy; and the Model Councillor Code of Conduct.

2. Scope

This policy applies to:

- All Yarra City Council staff, volunteers and contractors engaged by Council;
- All Yarra City Council customers, including children, young people, families and visitors who attend the services, programs and events delivered by, and spaces owned or managed by Council; and
- Any other member of the community.

3. Policy Statement

3.1 Our Commitment to You

Yarra City Council is [committed to being a child safe organisation](#).

We recognise that children and young people who are unhappy about our services, or how they have been treated by our employees and representatives, have the right to make a complaint.

Children, young people and their families are integral to our community, and we are committed to:

- Having a child-focused complaints process that meets the needs of the children and young people who access our services, programs, events and facilities;
- Removing barriers to making child safe complaints by providing accessible information for children, young people, their families, and others so they can raise their concerns;
- Creating opportunities for children and young people to express their views in matters that affect them, and to exert influence and impact through the complaints process;
- Privileging the needs, rights, safety and wellbeing of children and young people above all;
- Being transparent and handling child safe complaints promptly and professionally;
- Addressing any issues arising from a child safe complaint; and
- Using child safe complaints data to drive decision making and continuous improvement.

We welcome child safe complaints as an opportunity to improve our child safe practices and reflect on how Council operates and how its services are delivered.

3.2 Guiding Principles

Principle	Description
Child-focused	We will uphold the right of children and young people to raise their concerns and make a child safe complaint if they are unhappy or feel they have been treated unfairly. We will prioritise their safety, wellbeing, best interests and developmental needs in our response.

Principle	Description
Accessible	We will ensure Council has a simple and effective system in place for children, young people and the community to raise their concerns. This includes proactively promoting a 'speak up' culture and addressing any barriers to making child safe complaints.
Transparent	We will be clear, open and honest about how and where to make a child safe complaint, and how they will be handled once received. This is to ensure children, young people, families and the community fully understand what to expect and feel informed throughout the complaints handling process.
Objective and Fair	We will address child safe complaints consistently, respectfully and without bias. All parties will be heard; and decisions will be made impartially by an objective decision-maker based on merit and reliable/factual information.
Continuous improvement	We will use child safe complaints as an opportunity to learn and make positive changes. We will regularly review complaints to identify patterns, risks and systemic issues, and take action to improve policies, procedures, services and practices so we can create safer environments for children and young people.

4. Legislative and Policy Context

4.1 Legislative Framework

This policy is informed by our legal obligations under child safety, criminal, privacy and local government laws in Victoria:

- Child Wellbeing and Safety Act 2005
- Crimes Act 1958
- Local Government Act 2020
- Local Government (Governance and Integrity) Regulations 2020
- Privacy and Data Protection Act 2014
- Wrongs Act 1958

4.2 Policy Context

Under Standard 7 of the Victorian Child Safe Standards (the Standards), Council must have an accessible, culturally safe and child-focused complaints handling policy. To comply with this Standard, Council must:

- Have an accessible, child-focused complaint handling policy which clearly outlines the roles and responsibilities of leadership, staff and volunteers.
- Set out approaches to dealing with different types of complaints, breaches of relevant policies or the Code of Conduct and obligations to act and report.
- Ensure complaint handling processes are understood by children, families, staff and volunteers, and are culturally safe.
- Ensure complaints are taken seriously and responded to promptly and thoroughly.
- Have 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.
- Ensure reporting, privacy and employment law obligations are met when responding to complaints and concerns.

5. Roles and Responsibilities of Staff

Role	Responsibilities
All staff	Familiarise themselves with this policy and the child safe complaints process. Assist children and young people, parents/carers and other members of the public to make a child safe complaint. Treat anyone who has or wishes to make a child safe complaint respectfully and professionally. Comply with this policy.
Frontline Staff	Receive and where possible resolve child safe complaints at the point of contact. Comply with this policy and ensure complaints are appropriately documented. Consider what child safety complaints may require an internal investigation and escalate according to the guidelines of this policy. Immediately notify the Senior Advisor Workforce Equity and Inclusion (Child Safety) and complete a Child Safety Incident Report where a child safe complaint they have received involves the: • Alleged child-related misconduct or reportable conduct by a Yarra employee or representative; or • Alleged breach of Yarra's child safe policies and reporting procedures by a Yarra employee or representative.
Team Leaders, Coordinators and Branch Managers	Appropriately triage child safe complaints that require investigation. Immediately notify line management and the Senior Advisor Workforce Equity and Inclusion (Child Safety) of the child safe complaint. Investigate the child safe complaint, liaise directly with the customer when a complaint is about staff or policies they manage, or when the issue is related to service delivery and cannot be resolved by frontline staff. Review and implement identified service improvements. Ensure their staff, volunteers, students and contractors understand this policy. Comply with this policy.
Directors	Investigate the matter and liaise directly with the customer when a child safe complaint involves a member of their senior leadership team (Branch Managers). Support service improvements that arise from child safe complaints. Oversee internal reviews, where appropriate. Review actions or results from previous investigations which resulted in an internal review. Comply with this policy.
Chief Executive Officer	Promote positive behaviours and practices relating to enabling, responding to, and learning from child safe complaints. Support service improvements that arise from child safe complaints. Review actions or results from previous investigations that resulted in an internal review.

Role	Responsibilities
	Manage any child safe complaints about their General Managers (Executive Leadership Team). Comply with this policy.
Senior Advisor Workforce Equity and Inclusion (Child Safety)	Act as Council's nominated Child Safe Complaints Person - alternate channel to directly receive and triage child safe complaints. Work in collaboration with frontline staff and leadership to resolve and/or investigate any child safe complaints they receive directly. Triage all child safe complaints about Children's Services to the Coordinator Children's Services as per regulations. Triage all child safe complaints involving Councillors to the appointed Council Conduct Officer as per regulations. Comply with this policy.
Council Conduct Officer	Work in collaboration with the Senior Advisor Workforce Equity and Inclusion (Child Safety) to manage child safe complaints about Councillors. Liaise directly with the Principal Councillor Conduct Registrar (PCCR), and other external authorities where Councillors are alleged to have engaged in child-related misconduct or a related criminal offence.
Councillors	Refer any child safe complaints they receive to the Council Conduct Officer to be dealt with in accordance with this policy.
Relevant Third-Party Contractors, Students and Volunteers	Immediately notify their City of Yarra Contract Manager or Contact Person of any child safe complaints they receive in accordance with the terms and conditions of the contract or agreement. Manage child safe complaints referred to them by the City of Yarra in accordance with their legal obligations and own complaints procedures. Notify their City of Yarra Contract Manager or Contact Person of the outcome of any child safe complaint investigated by them as per the terms and conditions of the contract or agreement.

6. Definitions

Contractor is a third party who carries out services on behalf of Council.

Complaint is an expression of dissatisfaction with an action taken, decision made, or service provided; or with the failure to provide a service, take action or make a decision.

Complainant/customer is any individual affected by the action or inaction of Council, including children and young people engaged in our services and programs (aged 0-25).

Frontline staff are employees who provide direct services, handle physical operations, or interact face-to-face with the public and customers.

7. Child Safe Complaints

7.1 What can a child safe complaint be about?

A child safe complaint is different to other types of complaints. For the purposes of this policy, a child safe complaint includes a complaint about:

- A Council service action or decision that directly affects the life of a child or young person;
- Any aspect of a Council-run service, program, event or facility accessed by children and young people that has or could raise the possibility of abuse or harm occurring;
- A non-compliance with organisational child safety and wellbeing legal obligations;
- A breach of Yarra's child safe policies and processes by a Yarra employee or representative;
- Alleged child-related misconduct or reportable conduct by a Yarra employee or representative; or
- Yarra's response to, or management of a child safe incident, or prior child safe complaint.

7.2 What can't a child safe complaint be about?

For the purposes of this policy, a child safe complaint does not include:

- General feedback;
- Service requests;
- Any complaint about Council and its services unrelated to child safety and wellbeing; or
- A child safe incident, including disclosures of abuse or harm made by a child or young person, protective concerns for a child or young person, or concerns about the problematic or harmful behaviours of a child or young person.

7.3 What is the difference between a child safe complaint and a child safe incident?

The core difference is that a complaint is a formal or informal expression of dissatisfaction, concern, or grievance regarding Council's child safety practices, culture, environment, or the conduct of our personnel. It focuses on accountability, policy breaches, and systemic issues and occurs when a child/young person, parent, or community member formally reports that Council has failed to maintain a child safe environment.

A child safe incident on the other hand is a specific, observable event, occurrence, or disclosure where a child has experienced abuse or harm, is actively at risk of abuse or harm, or where a severe, high-risk hazard or policy breach has just occurred. It focuses on immediate safety, crisis response, incident management, and mandatory reporting.

Child safe complaints and child safe incident can interact directly. For example, a child safe incident can trigger a complaint if someone feels the organisation managed the incident poorly. Conversely, a complaint can reveal a child safe incident if an internal investigation into a grievance uncovers historical or previously unknown child abuse that requires appropriate reporting and response.

Dimension	Child Safe Complaint	Child Safe Incident
Core Nature	A communication, report or allegation.	An event, occurrence or disclosure of child abuse.
Trigger	A person expresses dissatisfaction or concern.	Specific action has occurred, or a sign of child abuse is detected.
Focus	Organisational systems, culture, behaviour or policy breaches	Immediate physical, emotional and/or cultural safety.
Initial Action	Log the grievance and initiate an internal review or investigation – within 10 days.	Ensure immediate safety and reporting to the relevant authorities – within 24hrs.
Primary System	Managed via standard organisational complaint handling procedures.	Managed via emergency management, incident response, mandatory reporting.
Policy & Process	Child Safe Complaints Policy.	Child Safe Policy and Incident Reporting Process.

You should treat a child safety concern as a complaint if it involves:

- Allegations that council staff, volunteers, or contractors have breached the Child Safe Code of Conduct (e.g., sending private social media messages to a youth program participant).
- Concerns about council facilities or infrastructure (e.g., lack of visibility in a changing room or unmonitored blind spots in a public space).
- Dissatisfaction with how a previous child safety concern was handled or managed by Council.
- Structural or cultural safety concerns, (e.g., a Council service failing to provide a culturally safe environment for Aboriginal or Torres Strait Islander children and young people).

You must treat a child safety concern as an incident if it involves:

- Disclosures or suspicions of child abuse or harm involving a child or young person participating in a Council-run service, program or facility.
- Peer-on-peer behaviours that could cause serious harm (e.g., severe physical violence, harmful sexualised behaviours, or serious bullying).
- Immediate, high-risk safety hazards or policy breaches (e.g., a child is left completely unsupervised during a program, or an unauthorised adult has entered a restricted child/youth space).

7.4 Who can make a child safe complaint?

A current or former customer of Council including a child or young person; parent, carer or guardian; service user, client or program participant; or a member of the public accessing Council facilities.

Yarra employees are required to report their child safe concerns as per Council's Child Safe Policy, Child Safe Incident Reporting Process, and the Child-Related Reportable Conduct Policy.

7.5 How to make a child safe complaint

Children and young people

You have the right to feel safe and happy at Yarra.

You also have the right to tell us when something has gone wrong or isn't working well.

If you ever feel unsafe or unhappy at a Yarra-run service, program, event or place; you have the right to make a complaint. Your complaint can be about:

- Any aspect of the service, program, event or place you attend;
- How someone who works at Yarra treated you; or
- How we have responded to a previous child safe incident involving you, or complaint made by you.

Before making your child safe complaint, you are encouraged to think about:

- What happened to make you feel unsafe or unhappy;
- What you think would help to fix the problem;
- Whether you need a trusted adult to help you make the complaint, or to do it for you;
- How involved you want to be in the complaints process;
- Whether you have any additional needs to support you to participate in the process; and
- What other support you might need while we look into the problem for you.

We know from talking to children and young people that if you're unhappy or worried about something, most of you would prefer to tell your family, or an adult who works for us that you like and trust, but there are other ways you can make a child safe complaint too. You can:

- Talk to a worker you know and trust; or
- Tell the person in charge (the boss) of the service, program, event or facility you attend; or
- You can contact our 'Child Safe Complaints Person' online, by phone, email or post.

They will listen carefully and tell you how they can help. They will also take action to ensure you are safe.

If you don't feel you can tell us what's wrong directly, or you're unhappy with how we managed your complaint, you can also contact an outside agency who can help.

You can find more information about what options are available to you in Section 8.3 of this policy, or on the [Child Safety and Wellbeing](#) page on our website.

Parents/carers and other adults

Where a child safe complaint is made by an adult, helpful information to include in the complaint includes:

- Full name;
- Contact information, such as mobile number, email address and/or postal address;
- The Council service, action or decision you are complaining about;
- Why you are dissatisfied;
- All known and relevant details, i.e., dates, times, locations, names, supporting evidence;
- Your desired outcome; and
- Any additional communication or accessibility needs.

Anonymous child safe complaints

Council recognises people's right to complain anonymously.

Council will still record and act on anonymous complaints but may be limited in what they can do to resolve the matter if insufficient information is provided; and will not be able to provide updates to customers if contact information is not supplied.

7.6 Complaint channels

We aim to make complaints as accessible and easy as possible and recognise that some people may have particular needs or require extra assistance in making a complaint. Below is a list of options.

Phone	03 9205 5555
Website	Customer complaints and feedback Yarra City Council
Email	info@yarracity.vic.gov.au
In Person	At any Council office or facility
Postal Address	Yarra City Council PO Box 168 Richmond VIC 3121
Interpreter Service	If you speak a language other than English, you can use our interpreter service .
National Relay Service	Choose your preferred NRS channel then ask for 03 9205 5555.

7.7 Fair and reasonable treatment

The safety and best interests of the child or young person will be privileged in all aspects of our response to a child safe complaint.

Processes to investigate and respond to child safe complaints will be child focused and will include accessible and culturally safe opportunities for them to participate in the process if they wish to.

Anyone who makes a child safe complaint will be treated fairly, with courtesy, respect and discretion throughout the complaints process.

We will work with you to address your complaint in a fair, transparent and timely manner.

We will engage with you in a meaningful, culturally sensitive and respectful way to resolve the issue.

Our response to child safe complaints recognises your right to be heard fairly, to have an unbiased decision made by an objective decision-maker, and to have a decision made based on the available evidence.

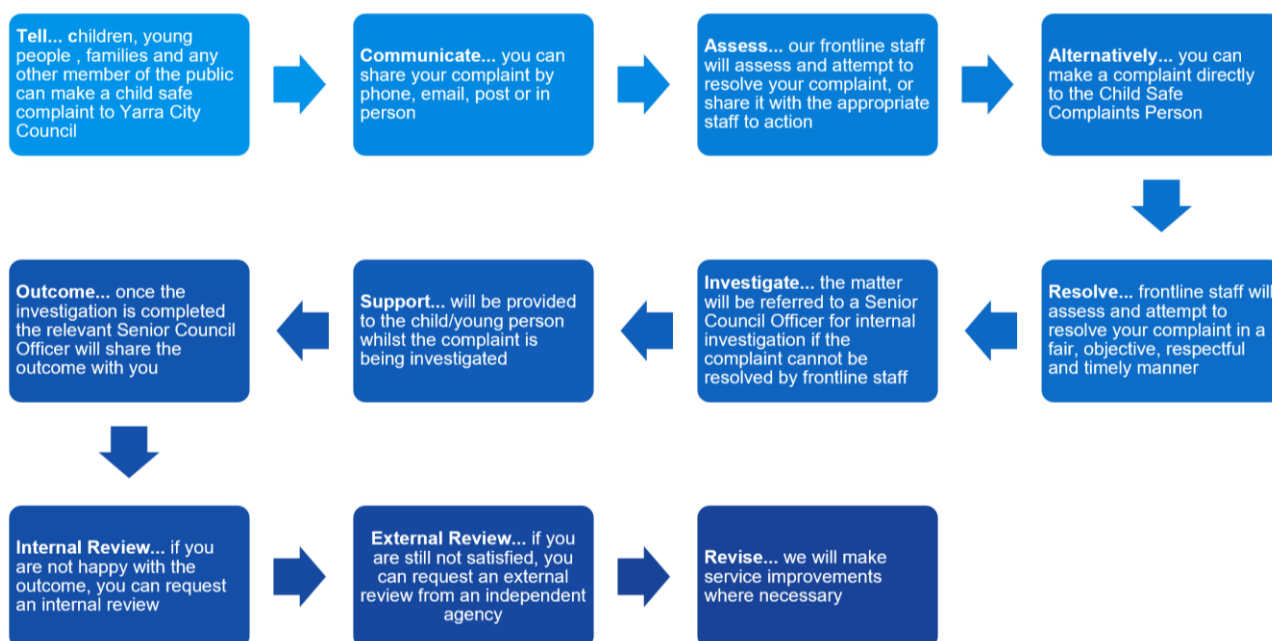
We will refer any child safe matters to the relevant authorities where required to do so.

7.8 Support and managing risks to children and young people

When we receive a child safe complaint, we will offer the child, young person and/or their family appropriate assistance and support during and after the complaints process. This may include making referrals to relevant external support services where requested/required.

Depending on the nature and seriousness of the complaint, a risk assessment may be undertaken to ensure appropriate steps are taken to protect the child and/or to support a safe re-entry into the service/program.

8. Child Safe Complaints Process



Level 1 – Frontline resolution

Initially raise your concern directly with frontline staff. They will assess and attempt to resolve your complaint straight away based on the information available. Alternatively, you can lodge your complaint directly with the Child Safe Complaints Person and they will triage the matter as appropriate. If the complaint is resolved, then no further response is required. Some actions which may be taken include, but are not limited to:

- Provide an outcome to your complaint (lodge a service request in our CRM).

- Advise of an alternative process to manage your complaint if it falls under another legislative/regulatory review process (see Section 8.1).
- Refer your complaint to an appropriate Senior Council Officer for further investigation and where possible resolution.

Level 2 – Investigation

If the complaint has not been resolved by frontline staff or the Child Safe Complaints Person, it will be referred to an independent Senior Council Officer for investigation. At this stage you will receive a response within 10 business days of the date the complaint was referred to them with either an outcome, or a response to indicate that further time is needed where the complaint is of a sensitive or complex nature. Some actions which may be taken include, but are not limited to:

- Contacting you through your preferred channel to advise you of the investigation and seek further information where necessary.
- Take ownership of your complaint and setting reasonable timeframes for response.
- Reviewing the complaint against relevant policies, procedures and legal obligations.
- Bringing relevant parties together to discuss the issues and possible solutions where appropriate.
- Provide an outcome of your complaint in writing.

Level 3 – Internal review

If you are dissatisfied with the investigation process and outcome, you can request an internal review verbally or in writing. We ask that you include all relevant information and supporting documentation in your request. Internal reviews will be assigned to a Senior Council Officer who will be independent of the person who took the action; made the decision; and or provided the service.

The officer will undertake a complete review of the complaint and seek expert advice where necessary.

The officer will provide you with an outcome in writing at the conclusion of the review. The outcome letter will contain a decision and explain Council's reasons for the decision. It will also contain information about any external review options available specific to the nature of the complaint.

Level 4 – External review

If no satisfactory outcome is achieved, or at any other time, you can request an external review from an independent agency. There are different options available to you depending on the nature of the complaint (see Section 8.2 below).

8.1 Notifying the right people for review

Any matter received that does not fall within the definition of a child safe complaint under this policy, or where other legal obligations apply, the complaint will be referred on for action as follows:

- Where a matter relates to the alleged abuse of a child or young person, it will be referred to the Nominated Supervisor and responded to in accordance with our Child Safe Policy and Incident Reporting Process.
- Where a matter relates to the alleged conduct of a Yarra employee, volunteer or representative, it will be referred to the Nominated Supervisor and responded to in accordance with Council's Child Safe Code of Conduct and Child-Related Reportable Conduct Policy.
- Where a matter relates to the alleged conduct of a Yarra Councillor, it will be referred to the Council Conduct Officer and will be responded to in accordance with the Model Councillor Code of Conduct as required under the *Local Government Act 2020*. Any member of the public who has been affected by the behaviour of a Councillor or group of Councillors can make a complaint, however complaints about our Councillors follow a different process.

- Where a complaint relates to Children's Services, the matter will be referred to the Nominated Supervisor and responded to in accordance with their Dealing with Complaints Policy as required under Education and Care Services laws and regulations.
- Where a complaint is not directly related to child safety and wellbeing, it will be referred to the responsible Nominated Supervisor to be responded to under Council's Customer Complaints Policy.
- Where a complaint involves an alleged criminal offence, it will be reported to Victoria Police.

8.2 If you're dissatisfied with our response

If you do not feel you can share your concern with us directly, or are not satisfied with how we handled your child safe complaint, you can contact one of the agencies below for an external review:

Complaint Type (Council)	External Review Option
Council's compliance with the Victorian Child Safe Standards and Reportable Conduct Scheme	Social Services Regulator (SSR) • Phone: 1300 310 778 • Email: childsafeorgs@ssr.vic.gov.au To report a concern or allegation under the Reportable Conduct Scheme go directly to the secure webform
Early childhood services	Victorian Early Childhood Regulatory Authority (VECRA) • Phone: 1300 307 415 • Online: using the online complaint form Contacting your local VECRA office – use the interactive map to locate your local office.
Council's failure to comply with one or more of the Information Privacy Principles (breach of privacy)	Office of the Victorian Information Commissioner (OVIC) • Phone: 1300 666 444 • Email: privacy@ovic.vic.gov.au • Online: using the privacy complaint form
Actions, decisions and inaction of Council, Council staff and/or contractors if: - you have already tried to resolve the matter with Council first; and - you're not happy with our response and the issue continues to affect you	Victorian Ombudsman • Phone: 1800 806 314 • Online: using the complaints form

8.3 Where to direct child safe complaints about outside (non-Council) agencies

If your child safe complaint relates to a government department or agency outside of Council, you must make a complaint directly to those bodies.

Complaint Type (Outside Organisation)	External Review Option
Children/young people in care services (previously called out-of-home care) who are unhappy or concerned about their care or how a person looks after them	Department of Families, Fairness and Housing - Phone: 1300 884 706 - Email: feedback@dffh.vic.gov.au - Online: using the complaints form
Your health and health information	Health Complaints Commissioner Phone: 1300 582 113 TTY service for people with hearing or speech difficulties
Complaints about the department's services and staff	Department of Justice and Community Safety - Phone: 8684 0000 Child safety concerns and complaints can be made directly to the Child Safety Contact Officer - Phone: 9136 3666 - Email: childsafe@justice.vic.gov.au
Complaints about a public mental health service	Mental Health and Wellbeing Commission Phone: 1800 246 054
People with a disability and disability services	Disability Services Commissioner - Phone: 1800 677 342 (free call) - Email: complaints@odsc.vic.gov.au TTY service for people with hearing or speech difficulties
Discrimination complaints	Victorian Human Rights & Equal Opportunity Commission Phone: 1300 292 153
Your experience with Victoria Police, including concerns about the actions or behaviour of protective service officers, police custody officers or any other person working for Victoria Police	Police Conduct Unit - Speak with the police officer in charge of your local police station - find your local police station - Make complaint directly to the Police Conduct Unit Make an online complaint - Make a complaint by email or post - Phone: 1300 363 101

9. Privacy, Confidentiality and Information Sharing

Council has a duty to protect the personal information of all parties involved in a child safe complaint, however limits to confidentiality apply where:

- A reasonable belief that a child is experiencing or is at risk of experiencing abuse is formed;
- There is an unacceptable or significant ongoing risk to the child, family, employee or organisation;
- The complaint involves an allegation of employee misconduct (breach of Yarra's Child Safe Code of Conduct or Staff Code of Conduct), reportable conduct, or a criminal offence and is subject to either a criminal, regulatory or internal investigation; and
- Where other laws override privacy law, i.e., child safe records are subpoenaed by the court, requested by a relevant authority (i.e., police, child protection, regulator), or are requested by a

prescribed information sharing entity under the [Victorian Family Violence Information Sharing \(FVISS\)](#) and [Child Information Sharing Scheme \(CISS\)](#).

- Although we can legally share information under these circumstances without your consent, we will tell you of our intent to do so where appropriate and/or authorised to do so.

When investigating and responding to child safe complaints we will ensure:

- Council officers are informed of a child safe complaint on a “need to know” basis, i.e., they are the Nominated Supervisor of the service, program, event, facility or employee subject to the complaint.
- Information is used to deal with the complaint or address systemic issues arising from the complaint.
- Only disclose/share information pertaining to certain types of complaints as permissible by law.
- Only report on child safe complaint data in a collated and de-identified manner.

10. Records Management, Monitoring and Evaluation

All child safe complaints requiring investigation (i.e., matters that could not be resolved by frontline staff, or were referred directly to the Child Safe Complaints Person) are recorded in Council’s CRM.

Child safe complaints data is routinely analysed and used to improve our child safe policies, procedures, practices and organisational culture.

Our Executive Leadership Team are provided with quarterly child safe reports which includes deidentified and collated child safe complaints data.

All child safety records held by Council, including child safe complaints are retained for a minimum of 45 years in line with best practice.

11. Related Documents

Child-Related Reportable Conduct Policy
Child Safe Policy
Child Safe Code of Conduct
Customer Complaints Policy
Dealing with Complaints Policy (Children’s Services)
Model Councillor Code of Conduct

12. Document History

Version:	1
Date:	10 August 2026
Changes:	New Policy
Position Title:	Senior Advisor Workforce Equity and Inclusion (Child Safety)
Branch:	People and Culture