2.4.1 Complaints and Appeals Policy and Procedures

This policy applies to Acknowledge Education and the International College of Hotel Management (ICHM).

1.0 Rationale

This policy and procedure is established to reinforce Acknowledge Education (AE) / Stott's College and International College of Hotel Management's (ICHM) (hereafter referred to as the Colleges) commitment to the fair and efficient resolution of complaints and appeals. The guiding principles highlight the values of fairness, transparency and continuous improvement in the Colleges' approach to handling complaints.

2.0 Scope

This Policy and Procedure applies to all students, including prospective students, regardless of campus location, place of residence, or mode of study, and across all courses offered by the Colleges, including accredited and non-accredited delivery and programs delivered to overseas students in accordance with the National Code of Practice for Providers of Education and Training to Overseas Students (2018). It includes specific obligations relating to students under 18 years of age and their parents, carers, or guardians. These procedures apply equally to all students, irrespective of eligibility for government subsidies, FEE-HELP, or VET Student Loans, and are implemented by staff and relevant members of the College community in the performance of their roles.

This Policy and Procedure covers complaints and appeals relating to both academic and non-academic matters. Academic matters include student progress and assessments, curriculum and its delivery, and other in-class matters. Non-academic matters include fees, non-academic services (including IT, counselling and facilities), personal information held by the Colleges, and appeals relating to decisions to report international students for non-compliance with visa requirements.

These procedures apply to complaints or appeals concerning College staff (academic and non-academic), admissions processes (including educational agents), programs delivered by third parties on behalf of the Colleges, related service providers, management, members of the corporate governing body, and complaints made by students about other students. Complaints, appeals and student conduct matters are distinct

processes that may overlap; where appropriate, matters may also be managed in accordance with the Student Code of Conduct.

This Policy and Procedure extends to the Student Resolution and Conduct Team , which is responsible for maintaining a comprehensive register of complaints and appeals, analysing outcomes and making recommendations for continuous improvement.

The Colleges recognise that some cohorts may require additional support to access complaints and appeals processes, including students with disability, culturally and linguistically diverse backgrounds, international students, students unable to live at home, and students who identify as LGBTIQA+. Reasonable support and adjustments are available on request.

This Policy and Procedure operates alongside the Colleges' Child Safety and Wellbeing Policy. Complaints or concerns relating to child abuse or child safety are managed in accordance with the Child Safety and Wellbeing Policy and the Guidelines for Responding to Incidents, Disclosures and Suspicions of Child Abuse, and are not managed through informal resolution pathways. The Colleges will take immediate action in response to any allegation, suspicion or disclosure of child abuse, including reporting to relevant authorities, taking protective action, and creating and retaining appropriate records in accordance with mandatory reporting obligations and child safety procedures. Allegations, suspicions or disclosures will be reported regardless of whether there is a legal obligation to report.

Fulfilling responsibilities under this Policy and Procedure does not displace or discharge any other legal or professional obligations that arise where a person reasonably believes a child is at risk of abuse. These procedures apply to complaints and concerns relating to child abuse made by or in relation to a child or student, staff, volunteers, contractors, service providers, visitors or any other person connected to a school or boarding premises environment.

This Policy and Procedure is Person-centred and Trauma-informed in its content and application and aligned with our Gender Based Violence (GBV) Whole-of-Organisation Prevention and Response Plan that reflects the needs, experience and agency of all members of the Provider's community, particularly those members who are disproportionally affected by Gender-based Violence, including women, First Nations people, culturally and linguistically diverse communities, people with disability and people of diverse sexual orientation and gender identity.

3.0 Regulatory Context

3.1 Higher Education Standards Framework (HESF) (2021)

3.2 National Code of Practice for Providers of Education and Training to Overseas Students (2018)

3.3 Standards for Registered Training Organisations (RTOs) 2015

3.4 Ministerial Order 1359 - Implementing the Child Safe Standards - Managing the Risk of Child Abuse in Schools and School Boarding Premises

3.5 National Higher Education Code to Prevent and Respond to Gender-based Violence 2025

3.6 TEQSA's Statement of Regulatory Expectations: Student grievance and complaint mechanisms

4.0 Guiding Principles

The Colleges are committed to complaints and appeals being resolved fairly and efficiently. The following guiding principles aim to uphold the values of fairness, transparency and continuous improvement in the Colleges' approach to handling complaints and appeals.

4.1 Fairness and Impartiality

The Colleges will ensure all complaints and appeals are treated with fairness and impartiality, irrespective of the parties involved.

4.2 Timeliness

The Colleges will handle complaints and appeals promptly, efficiently and with minimal delays, recognising the importance of timely resolution.

4.3 Consistency

The Colleges will ensure consistency in the application of the Complaints and Appeals procedures across all campuses.

4.4 Transparency

The Colleges will maintain a transparent and easily accessible process for submitting, processing and resolving complaints and appeals. All Complaints and Appeals will be clearly documented and recorded for transparency.
Staff members handling any complaints or appeals will report any conflict of interest.

4.5 Natural Justice and Procedural Fairness

The Colleges are committed to adhering to principles of natural justice and procedural fairness throughout the complaints and appeals process.

4.6 Objectivity

Assessment of Complaints and Appeals will be conducted using a thorough, objective and unbiased evaluation of each complaint or appeal, ensuring a comprehensive understanding of the circumstances.

4.7 Continuous Improvement

Complaints and appeals will be viewed as an integral part of the Colleges' continuous improvement processes to ensure that the voice of students informs the improvement process and by extension enhances the quality of services and support provided by the Colleges.

5.0 Policy

5.1 Access to the Complaints and Appeals Process

5.1.1 All complainants have an unequivocal right to equal access to the complaints and appeals procedure, ensuring the process is open, accessible and available to every student, irrespective of background, status, or any other distinguishing factor.

5.1.2 Complainants have the right to request assistance in the form of a translator/interpreter, and both the complainant and respondent may bring a support person to meetings, provided the College is notified in advance. Support persons may attend solely in a support capacity and must not act in a legal or representative role.

5.1.3 Students under the age of 18 years can ask a parent, carer or another trusted adult outside of the school, to discuss the issue on their behalf.

5.1.4 Policy and Procedures will be accessible publicly on the website and information provided to students at various key points in their educational life-cycle (orientation, student handbook, LMS, website)

Further information and resources to support students to raise issues or concerns are available at:

- Report Racism Hotline (call 1800 722 476) – this hotline enables students to report concerns relating to racism or religious discrimination
- Reach Out
- Headspace
- Kids Helpline (call 1800 55 1800)
- Victorian Aboriginal Education Association (VAEAI)

5.1.5 Fulfilling the roles and responsibilities in this policy and the associated procedures does not displace or discharge any other obligations that arise if a person reasonably believes that a child is at risk of child abuse.

5.1.6 This policy and associated procedures are publicly available on the Colleges' website and are provided to students on request.

5.2 Student Resolution and Conduct Committee

5.2.1 Stage 3 appeals following a Stage 2 complaint are determined by the Student Resolution and Conduct Committee in accordance with section 6.5. Stage 3 appeals in relation to a Notice of Intent to Report (ITR) are determined by the relevant department.

5.2.2 The Student Resolution and Conduct Committee is a standing committee established under this Policy. The Committee comprises a minimum of three members for each matter, including the Chair or an Acting Chair where required.

5.2.3 The Student Resolution and Conduct Committee will comprise the following members:

- Chair: Student Resolution and Conduct Team Leader or Head of Operations
- Secretary: Student Resolution and Conduct Officer, Student Services Officer (SSO), or Administrative Officer
- Senior Academic Representative: Provost, Dean or Associate Dean
- Quality Office Representative: Head of Quality and Risk (HQR) or Quality and Accreditation Manager
- The Chair may invite additional members or subject matter experts to participate where relevant to the nature of the complaint or appeal. This may include, but is not limited to: Finance Representative, Head of Student Administration, CEO, Head of Engagement and Partnerships, Campus Operations Manager, Director of Teaching and Learning, Head of School, Head of Vocational Education and Training (VET), etc.

5.2.4 Committee members must not have:

- any personal involvement or connection with the student or the matters under consideration, or
- any prior involvement that could reasonably give rise to actual or perceived bias, prejudice, or a conflict of interest.

All members are required to declare conflicts of interest prior to consideration of a matter.

5.2.5 Where the Chair has had direct involvement in the investigation or was the decision maker at an earlier stage of the matter, the Chair must declare a conflict of interest and an Acting Chair will preside for that matter only.

5.2.6 Administrative and secretariat support for the Committee, including record keeping, is provided by the Student Resolution and Conduct Team. Records of deliberations and

decisions are maintained in accordance with recordkeeping, privacy, and information security obligations.

5.3 Resolution of a Complaint or Appeal

5.3.1 The resolution of a complaint or appeal is flexible, allowing for closure at any stage. However, in instances where further investigation is deemed beneficial for enhancing services, products, or processes, the involved manager may choose to continue the inquiry.

5.3.2 Complainants retain the right to appeal where there is evidence that their complaint has not been adequately addressed, with details of the stage 3 appeal process available in the Complaints and Appeals Procedure below.

5.3.3 External review pathways are available once internal processes are exhausted, except where required by law or where immediate external referral is appropriate. The complainant can then elevate their concerns to an external independent arbiter, who will review the complaint and may propose a resolution.

5.3.4 Complaints involving child safety, sexual misconduct, serious criminal conduct, threats to safety, or significant regulatory risk may be escalated immediately to senior leadership and managed outside standard resolution pathways. Refer to ***VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse.***

5.3.5 **Declining to progress a complaint:** A complaint may be declined for progression only where it is:

- clearly vexatious, abusive, or intended to harass; or
- repetitive with no new information after prior finalisation; or
- outside scope and no other internal pathway applies; or
- not supported by sufficient information to allow assessment after the Colleges have requested clarification.

Where a complaint is declined:

- the student will be advised in writing of the decision and reasons; and
- the student will be advised of their right to request a Stage 3 review of the decision to decline progression (limited to whether the decline was reasonable and procedurally fair).

5.3.6 All complaints will be made and dealt with in a timely manner in accordance with the Colleges' Complaints and Appeals Procedure.

5.4 Safety and Wellbeing of the Complainant

5.4.1 The Colleges promote the informal resolution where appropriate. This does not apply to GBV disclosures, which may be made confidentially or anonymously and will be managed in accordance with trauma informed and safety created principles.

5.4.2 All concerns will be treated seriously and sensitively, with the complainant afforded respect and empathy throughout the entire process.

5.4.3 The policy ensures that the complainant and respondent are not subjected to victimisation or discrimination, and strict confidentiality is maintained throughout the complaints and appeals process.

5.4.4 Students may seek confidential, independent professional advice at any stage of a complaint.

5.4.5 Students are permitted to continue their studies during the complaint and appeal process, except in circumstances where health or safety is potentially at risk.

5.5 Record Keeping

Comprehensive documentation of the complaint, investigation, and outcome is maintained on the student management system and Complaints and Appeals Register. Information regarding the status of the complaint can be requested by the complainant or respondent at any point in the process. Either party may access their own records at any time.

5.6 Financial Cost

All internal complaints, and appeals by students, parents, or prospective students are managed with no cost to the complainant.

5.7 Continuous Improvement

5.7.1 Potential causes of complaints and appeals will be thoroughly investigated, and corrective and preventive actions will be taken, viewing complaints and appeals as opportunities for improvement.

5.7.2 Outcomes of each complaint and appeal undergo analysis by the Student Resolution and Conduct Team, with recommendations for improvement recorded in the Continuous Improvement Register and implemented throughout College operations.

5.8 Delegations, Decision Makers and Conflicts of Interest

5.8.1 **Delegations Register:** The Colleges maintain an internal Delegations Register that specifies the authorised decision makers for complaints and appeals by category (academic, non-academic, fees/finance, admissions/agents, welfare, facilities/IT, compliance/ESOS) and their alternates.

5.8.2 **Decision-maker allocation:** The Student Resolution and Conduct Team allocates each formal complaint (Stage 2) to the relevant delegated decision maker based on subject matter, with oversight by the Head of Operations.

5.8.3 **Alternate decision maker:** Where the delegated decision maker is unavailable, conflicted, or the subject of the complaint, the matter must be allocated to an alternate decision maker specified in the Delegations Register. Where no alternate exists, the CEO appoints an appropriate independent decision maker.

5.8.4 **Conflict disclosure:** Any staff member involved in receiving, managing, investigating, advising on, or determining a complaint or appeal must disclose any actual, potential, or perceived conflict of interest as soon as it becomes known.

5.8.5 **Conflict management:** Where a conflict exists, the conflicted person must take no further part in the matter, other than to provide factual information if requested, and the matter must be reassigned.

6.0 Procedures

Complaints processes are provided in ways that are culturally safe, accessible and easy to understand. Support persons may assist, including where language, cultural safety, disability, vulnerability, or other access needs are relevant. Assistance to lodge a complaint is available on request.

Complaints may be lodged in writing, in person, by email, or via the published complaints lodgement method on the College websites.

Parallel processes: Where a matter involves both complaint and conduct, the Colleges may manage processes in parallel. The student will be informed in writing which pathway applies to each issue and what decisions are reviewable under this policy.

6.2 Timeframes, Receipt, Extensions and Pausing

6.2.1 **Date of receipt:** A complaint/appeal is ‘received’ when submitted through the relevant online form, available via the College website and Student Portal. Where concerns, complaints or appeals are received by email/in writing/verbally, students are to be

encouraged to resolve the matter in line with Stage 1 of these procedures (Refer 6.3) and to only submit an online complaint/appeal form when attempts to resolve informally have been exhausted.

6.2.2 **Acknowledgement:** Written acknowledgement will be issued within five (5) business days of receipt for all complainants, including current students. Workflow entry alone does not replace written acknowledgement.

6.2.3 **Commencement of assessment:** Assessment will commence within ten (10) business days of receipt unless immediate escalation applies.

6.2.4 **Extensions:** If a matter cannot be finalised within the stated timeframe due to complexity, staff availability, or required external information, the student will be notified in writing before the deadline with:

- reason for the extension
- updated expected decision date
- any interim safety/wellbeing measures

6.2.5 **Student non-response:** Where the Colleges have requested information necessary to progress the matter and the student does not respond within ten (10) business days, the Colleges may finalise the matter on available information, after issuing one written reminder.

6.3 STAGE 1 – Concern / Informal Resolution

6.3.1 **NOTE:** For complaints relating to child abuse, refer to the clear actions and reporting obligations outlined in our ***Child Safety and Wellbeing Policy*** and ***Guidelines to responding to incidents, disclosures and suspicions of child abuse***.

6.3.2 In the first instance, the student should have an informal discussion with the party involved, where possible. If the student is uncomfortable or unable to do so, they are encouraged to informally raise the matter with the Student Services Officer Team Leader, Campus Operations Manager or Head of School for VCE students. Where the matter is academic in nature; students are encouraged to speak to the relevant lecturer, teacher, or Course Coordinator.

This informal discussion step does not apply to complaints or concerns involving child safety, child abuse, GBV, SASH, or risk of harm. These matters must be escalated immediately and managed in accordance with our ***Child Safety and Wellbeing Policy*** and ***Guidelines to responding to incidents, disclosures and suspicions of child***

abuse, Preventing and Responding to Sexual Assault and Sexual Harassment (SASH) Policy and Procedure, or ***Critical Incident Policy and Procedure.***

6.3.3 Informal Resolution and First Contact Process

The following steps apply to concerns or issues raised by students prior to the initiation of a formal complaint or appeal.

Step 1. Informal resolution where appropriate

a. Prior to initiating the formal complaint or appeal process, students and staff are encouraged to seek informal resolution of concerns where appropriate. It is expected that many matters will be resolved at this stage.
b. Informal resolution is encouraged but not required where the matter involves safety concerns, alleged misconduct, power imbalance, child safety matters, or regulatory risk. In such cases, the matter must proceed directly to the formal process.

Step 2. First point of contact responsibilities The staff member who receives the concern and is the first point of contact is responsible for:

a. arranging a meeting or discussion with the student, where appropriate
b. discussing the concern and attempting to resolve the matter at first contact
c. documenting the discussion, actions taken, and outcome
d. recording relevant notes in the Student Management System

Step 3. Where the matter is resolved at first contact

If the concern is resolved at first contact:

a. the staff member must confirm the outcome to the student, either verbally or in writing, depending on the nature of the matter
b. no further action is required unless the issue is raised again or new information emerges

Step 4. Where the matter is not resolved at first contact

If the concern cannot be resolved at first contact, or if the student remains dissatisfied:

a. the staff member must advise the student of their right to lodge a formal complaint
b. the student must be directed to the online Complaints or Appeals Form as required
c. the staff member must record the interaction and outcome in the Student Management System

d. no attempt should be made to discourage the student from lodging a formal complaint

Step 5. Escalation to formal process (move to Stage 2)

Once a formal complaint is lodged:

a. the matter is managed in accordance with the Complaints and Appeals Procedure
b. responsibility for the matter transfers to the Student Resolution and Conduct Team
c. the original staff member may be required to provide information or documentation but will not manage the complaint

6.4 STAGE 2 – Formal Complaint

6.4.1 **NOTE:** For complaints or concerns relating to child abuse, refer to the clear actions and reporting obligations outlined in our ***Child Safety and Wellbeing Policy*** and ***Guidelines to responding to incidents, disclosures and suspicions of child abuse***. Matters involving child safety, serious misconduct, threats to safety, or significant regulatory risk may bypass informal and standard complaint steps and be escalated immediately.

6.4.2 If the issue raised by the student cannot be resolved informally (Stage 1), the student is invited to submit a complaint using the Complaint Form (Stage 2). The online Complaints Form can be accessed from the College Websites or through the student management system. Please note, students may access Stage 2 without completing Stage 1.

6.4.3 Students under the age of 18 years may ask a parent, carer or another trusted adult outside of the school, to raise the issue on their behalf or to complete the online Complaints form on their behalf.

6.4.4 The complaint should be comprehensively documented in the Complaints Form and include the following details:
a. The student's name and contact details;
b. Any relevant documentation, dates, locations, and witnesses as appropriate;
c. And any previous efforts to resolve the matter.

6.4.5 The completed Complaint Form is deemed to be a formal complaint (Stage 2) and must be submitted for consideration and processing. A formal complaint must be submitted

within 20 business days of the decision or event, whichever is later. In exceptional circumstances, the Colleges may accept a formal complaint outside the 20 business days, for instance, where a student is unable to provide a written submission due to a special circumstance. Where a complainant formally withdraws a complaint, the matter may be closed, noting that the Colleges may still act where there are safety, regulatory, or systemic risk considerations.

6.4.6 If confirmation is not received within five business days, the complainant is advised to contact the Colleges to confirm that the complaint has been received.

6.4.7 Once receipt is confirmed, the internal review investigation will commence as soon as practicable and within a reasonable timeframe. The complainant may be invited to provide additional information or to discuss the matter with the reviewer where required.

6.4.8 The Student Resolution and Conduct Team verifies evidence for authenticity, accuracy, sufficiency and relevance, and determines whether a matter can proceed, requires escalation or referral, while an outcome decision rests with the delegated decision maker. The delegated decision maker is the person responsible for the category of complaint. As an example if the complaint relates to finance, the CFO is the delegated decision maker.

6.4.9 The reviewer will record details of the complaint in the Complaints and Appeals Register. The Register is centrally managed and reviewed by the Student Resolution and Conduct Team under the oversight of the Head of Operations.

6.4.10 Generally a decision will be made within 10 business days of the formal receipt of the complaint or finalised as soon as practicable. Where resolution may take longer than the 10 business days the student will be informed in writing of the progress of the complaint. Where a complainant does not respond within a reasonable timeframe after an outcome is issued, the complaint may be deemed finalised and closed, with records retained.

6.4.11 All parties to the complaint will be notified of the resolution and outcome of the complaint in writing. The correspondence will also outline avenues for appeal in the event the student is dissatisfied with the outcome of the resolution. Requests to progress an appeal may be assessed to confirm that grounds of appeal are met before referral to an Appeals Panel.

6.4.12 The complaint and outcome will be added to the Complaints and Appeals Register and documentation saved under the student's record on the Student Management System.

6.4.13 Records of the complaint or concern and all response actions are made promptly, stored securely with access controls, and retained in accordance with recordkeeping and privacy obligations outlined in the ***Student record management policy and procedures*** and the ***Child Safety and Wellbeing Policy*** and response guidelines.

6.5 STAGE 3 - Appeal

6.5.1 A Stage 3 Appeal is a process where a student disputes:

i. the outcome of a Stage 2 Formal Complaint, or
ii. a Notice of Intent to Report (ITR), or an unsuccessful application for; refund, leave of absence, provider transfer or credit & RPL.

Refer to 6.5.3 for processes to be followed for other kinds of appeals, e.g., Appeal of Grade.

6.5.2 Where a student wishes to submit a Stage 3 Appeal, they or a parent/carer must complete and submit the online Stage 3 Appeal form. The online Stage 3 Appeal form can be accessed from the College Websites, or Student Services Team in each campus.

6.5.3 **APPEAL OF GRADE -** If the student is appealing a decision regarding the grading of their assessments, they will need to speak with their lecturer and/or Unit Coordinator and follow the procedures outlined in ***1.4.1 Student Assessment and Grade Management Policy and complete that process***. Appeal of grade or other assessment-related appeals must be finalised through these procedures before being escalated to a formal Complaint.

6.5.4 After an outcome to the Stage 2 Complaint has been provided to the student, the student has 10 business days in which to indicate their desire to Appeal the outcome and escalate to Stage 3. If they do not respond within that time, it is assumed that the outcome has been accepted and the complaint will be closed.

This time restriction may be waived at the discretion of the Student Resolution and Conduct Committee where compelling or compassionate circumstances are demonstrated, with verifiable evidence.

6.5.5 The appeal must set out the grounds, which must be meet the appeal eligibility requirements, and provide supporting evidence. It should also specify the outcome sought.

6.5.6 An appeal of a decision may be made on one or more of the following grounds:

a) That the decision was made without due consideration of relevant facts, evidence, or circumstances
b) That there was bias, prejudice or a conflict of interest by the investigative or hearing body or person
c) That some significant policy/procedural irregularity occurred in the investigative or complaint handling process.
d) New, relevant evidence becomes available that was not reasonably accessible at the time of the original decision.

6.5.7 An appeal will not be upheld on the basis of disagreement with academic judgement alone where the original decision was made in accordance with approved academic policies and applied standards.

6.5.8 On receipt of a valid internal appeal, the student will be provided with written confirmation. The student will be given a reasonable opportunity to present their case in writing and, where appropriate, to attend a hearing in person or by alternative means at no cost. Students will not be discriminated against or victimised as a result of lodging an appeal.

6.5.9 All Stage 3 appeals are referred to the Student Resolution and Conduct Committee for determination. No further internal appeal is available once a decision of the Committee has been issued.

6.5.10 The Student Resolution and Conduct Committee will review the appeal based on the original decision, the grounds of the appeal and the material available. The Committee may:

- Confirm the original decision
- Vary the decision
- Set aside the decision and substitute a new outcome

- Refer the matter back to the original decision maker for reconsideration where a procedural defect is identified.

6.5.11 The student will be provided with a written statement of the outcome of the appeal, including clear reasons for the decision, within 20 business days of the appeal being lodged, unless an extension is required due to complexity or availability of Committee members.

6.5.12 If the student is not successful in the Colleges' internal complaints and appeals process, the Colleges will advise the student within 10 business days of concluding the internal review of the student's right to access an external complaints handling and appeals process at no cost. The student will be provided with the contact details of the appropriate complaints handling and external appeals body per 6.6.

6.5.13 All appeals and outcomes will be recorded in the Complaints and Appeals Register and stored securely on the Student Management System in accordance with recordkeeping, privacy, and information security obligations.

6.5.14 Records of the complaint or concern and all response actions and outcomes are made promptly, stored securely with access controls, and retained in accordance with recordkeeping and privacy obligations and the Child Safety and Wellbeing Policy and response guidelines.

6.5.15 Where an overseas student lodges an internal appeal relating to a decision that may affect their enrolment status (including course progress, suspension, cancellation), the Colleges will manage the student's status in accordance with the National Code of Practice for Providers of Education and Training to Overseas Students (2018).

6.5.16 Where required under the National Code, the Colleges will not finalise reporting of the student to the relevant authority until:

i. the internal appeals process is completed; and
ii. where the student accesses an external appeal within the required timeframe, the external process is finalised, unless exceptional circumstances apply, including serious risk to health or safety.

6.6 External Appeals

Once internal avenues have been exhausted, students may access an appropriate external complaints handling and appeals body relevant to their course type and complaint category. The list below are a few contacts that students may approach for external resolution of complaints and/or appeals:

Provider	Service and Contact Information
National Student Ombudsman *(domestic and international students)*	The National Student Ombudsman works to resolve student complaints about higher education providers. We are a free and independent service available to all higher education students. https://www.nso.gov.au/ Call: 1300 395 775
Commonwealth Ombudsman *(International students only)*	The Commonwealth Ombudsman receives complaints from intending, current or former overseas students at private higher education providers. https://www.ombudsman.gov.au/complaints/international-student-complaints https://www.nso.gov.au/making-a-complaint/tips-for-making-a-complaint Call: 1300 362 072

6.6.1 VCAA Appeals for breaches of VCAA examination rules or school-based assessment authentication rules (VCE Students)

A student may appeal to the VCAA against a decision by the school, and any penalty imposed by the school, in respect of a contravention of the VCAA assessment rules relating to school-based assessments.

This right of appeal does not apply to decisions about the satisfactory completion of a course arising from a student's attendance, or other disciplinary decisions of a school not arising from a contravention of VCAA assessment rules. In these instances, please follow the procedures outlined in ths document at 6.3-6.5.

An appeal against a school decision must be made in writing to the VCAA Chief Executive Officer (CEO) no later than 14 days after the student receives written notice of the decision from the school. On receipt of a notice of appeal from a student, the VCAA will respond to interview the parties to the appeal and attempt to resolve the matter.

6.7 Record Management

6.7.1 Any determination made in relation to a formal complaint, or an appeal will be documented in the Complaints and Appeals Register, and correspondence records retained on the Student Management System.

6.7.2 Complaints and Appeals records will be maintained for five years for audit purposes in line with the ***Student record management policy and procedures***.

7.0 Roles and Responsibilities

Board of Directors

- Ensure the organisation maintains compliant, transparent, and effective complaints and appeals processes.
- Monitor trends, systemic issues, and outcomes of complaints and appeals through regular reporting.
- Assure that corrective actions are implemented and that continuous improvement processes are effective.
- Oversee that complaints, including those relating to child safety, are handled in accordance with legislative and regulatory requirements.
- Ensure summary information is made publicly available where appropriate.
- Receive periodic reports on complaint trends, systemic risks, and external appeal outcomes.

Chief Executive Officer (CEO)

- Provide overall leadership, resources, and oversight to ensure effective implementation of the Complaints and Appeals Policy.
- Ensure AE meets all regulatory obligations related to complaints, including for overseas students and child safety.
- Foster an organisational culture that supports fairness, transparency, and procedural fairness.
- Escalate and act on systemic risks or issues identified through complaints data.

Head of School / VCE Coordinator

- Implement the policy within the school/VCE environment and ensure processes are child-safe and accessible.
- Ensure timely, fair management of complaints within their area and support staff to follow procedures.
- Support students (including minors and vulnerable students) in accessing complaints pathways.
- Ensure concerns relating to child abuse are handled in line with Child Safety and Wellbeing requirements and mandatory reporting duties.
- Monitor compliance with complaints procedures and report trends or concerns to the CEO and/or governing body.

Head of Operations

- Form and oversee Student Resolution and Conduct Committee and ensure availability to meet procedural timelines.
- Ensure all complaints and appeals follow regulatory and child-safety requirements.
- Maintain confidentiality, procedural fairness and accurate records.
- Identify issues from complaints and support continuous improvement actions.

- Refer all eligible appeals to the Student Resolution and Conduct Committee for Stage 3 determination.

Student Resolution and Conduct Team

- The Student Resolution and Conduct Team is the central coordination and case management function for complaints, appeals and student conduct matters.
- The Resolution and Conduct Team does not make determinations on the merits of complaints, appeals or conduct matters, does not assess credibility, and does not impose outcomes or sanctions. Decision making authority rests with the delegated decision maker in accordance with this policy.
- Receive, triage and coordinate all student complaints, appeals and student conduct matters in accordance with this policy and relevant procedures.
- Maintain and monitor the Complaints and Appeals Register, ensuring records are complete, secure, accurate and up to date.
- Acknowledge receipt of complaints/appeals and provide clear information to students about process steps, timeframes, support options and escalation pathways.
- Facilitate procedural fairness by ensuring matters are managed impartially, relevant parties are informed and conflicts of interest are identified and managed.
- Coordinate investigations and information gathering, including requesting statements and documentation and ensuring evidence is appropriately managed and stored.
- Manage the handling and verification of evidence, including receipt, collation, secure storage and provision to decision makers, and making judgments about authenticity, accuracy, sufficiency and relevance to determine whether a matter can proceed or requires escalation, with final outcome decisions made by the delegated decision maker.
- Support decision-makers and panels by preparing documentation, scheduling meetings/hearings (where applicable), and recording outcomes.
- Monitor compliance with timeframes and escalate delays or procedural risks to the appropriate senior staff member.
- Ensure appropriate referrals are made for matters involving risk, wellbeing, child safety, critical incidents or regulatory reporting obligations.
- Where matters involve child safety, serious risk, or mandatory reporting obligations, the team's role is limited to triage, documentation and immediate escalation in accordance with relevant policies, and does not extend to investigating allegations.
- Communicate outcomes to students in writing, including reasons (where appropriate), any corrective actions and further review options.
- Analyse complaints and appeals data, identify trends/systemic issues, and provide reporting and recommendations to support continuous improvement.
- Continue to coordinate internal complaint or appeal processes where an external complaint has been lodged, unless directed otherwise by senior management or legal advice.
- Support audits, regulatory reviews, and external oversight processes by providing accurate records, timelines and documentation as required.
- The education provider ensures that a formal process is in place to analyse complaints, concerns, and safety incidents in order to identify contributing factors, root causes, and systemic issues, and to inform continuous improvement. This includes maintaining a complaints register with fields for

root cause analysis and corrective actions, undertaking regular trend analysis reporting, and documenting continuous improvement actions arising from that analysis.

- Outcomes and learnings from relevant reviews are communicated to staff and volunteers and, where appropriate, to students, families and the school community. Communication is provided in a de identified manner and through suitable channels, for example staff updates and regular student notices, to support continuous improvement and transparency.

All Staff

- Treat all complaints seriously, respectfully, and with procedural fairness.
- Support students to understand and access complaint pathways, including interpreters/support persons.
- Maintain confidentiality, impartiality, and accurate recordkeeping.
- Report conflicts of interest and withdraw from a matter where a conflict exists.
- Respond appropriately to disclosures of child abuse and follow reporting obligations immediately.
- Cooperate with internal investigations and external authorities when required. This includes providing evidence required to the Student Resolution and Conduct Team for determination of complaint in a timely manner

Agents, Contractors, and Volunteers

- Adhere to AE's complaints and appeals processes and support complainants to access them.
- Immediately report concerns, incidents, or disclosures, including child safety concerns.
- Cooperate with investigations and maintain confidentiality.
- These responsibilities apply to staff, volunteers, contractors, visitors and any other persons connected to the school environment.

8.0 Definitions

Term	Definition
Academic Judgment	A decision made by appropriately qualified academic staff about academic standards, assessment requirements, or academic performance, exercised in accordance with approved policies, procedures, and professional standards. Disagreement with academic judgement alone does not constitute grounds for a complaint or appeal.
Appeal	A formal request for a review or reconsideration of a decision that has been made.
Arbiter	An external independent entity responsible for reviewing complaints and proposing resolutions.

Business days	Monday to Friday excluding weekends, public holidays in the relevant campus state/territory, and approved College closure periods. Where campuses operate in different jurisdictions, the relevant campus calendar applies unless the matter is centrally managed.
Child Safe Standards	Definitions published by the Victorian Government outlining requirements for organisations to protect children from abuse: https://www.vic.gov.au/child-safe-standards-definitions
Commonwealth Ombudsman	Provides an independent external review service for international students who have completed a provider's internal complaints and appeals process and remain dissatisfied with the outcome.
Complaint	An expression of dissatisfaction, objection, or grievance raised by an individual or group regarding a particular situation, action, decision, or service.
Complaint Resolution	The process of addressing and resolving concerns, complaints, or disputes raised by students or stakeholders.
Conduct Matter	A matter involving an alleged breach of the Student Code of Conduct or other behavioural standards, including academic misconduct, dishonesty, harassment, threats, or conduct posing a risk to safety. Conduct matters may be managed outside standard complaints resolution pathways in accordance with this policy.
Decision maker	The staff member, officer, panel, or committee authorised under this policy to determine a complaint, appeal, or conduct matter at a particular stage.
Delegated decision maker	A decision maker who has been formally authorised to exercise decision making powers under this policy on behalf of Acknowledge Education.
Final internal decision	The outcome reached at the final stage of review available under this policy. Once a final internal decision has been issued, there are no further internal avenues for review or reconsideration.
Grounds for appeal	The permitted basis on which an appeal may be lodged under this policy. Grounds for appeal are limited to procedural error, factual error, bias, or misapplication of policy or procedure.
Misconduct	Serious behaviour that may warrant disciplinary action, including academic misconduct, falsification of documents, dishonesty, harassment, threats, or conduct posing a risk to others.
National Student Ombudsman	An independent body that reviews complaints from higher education students about their provider, offering an external avenue for review after internal processes have been completed.
Natural Justice and Procedural Fairness	Principles ensuring fairness, impartiality, and due process in handling complaints and appeals.
New evidence	Information that was not reasonably available at the time the original decision was made and that could have materially affected the outcome. Information that existed but was not provided at the time does not constitute new evidence.

Procedural error	A failure to follow the applicable policy, procedure, or required process that may have materially affected the outcome of a decision.
Registered Provider	An educational institution or organization officially registered and recognized by the relevant authorities.
Stage 1 complaint	An initial complaint managed through informal or local resolution processes.
Stage 2 complaint	A formal complaint submitted in writing, requiring documented consideration and a written outcome by an authorised decision maker.
Stage 3 appeal	A formal appeal of a Stage 2 decision considered by the Student Resolution and Conduct Committee . Stage 3 represents the final internal review stage.
Standards for Registered Training Organisations	Prescribed standards for Registered Training Organisations (RTOs) to ensure quality education and service delivery.
Student Resolution and Conduct Team	A team responsible for analysing outcomes of complaints and appeals, providing recommendations for improvement, and maintaining a register.
Unsubstantiated complaint	A complaint that is not supported by sufficient information or evidence to allow the matter to proceed or be upheld.

9.0 Related Documents

Document Name
Student Handbooks
Teaching Staff Guidelines
1.1.0 Framework for Student Recruitment
1.1.1 Admissions Policy and Procedures
1.3.1 Student Orientation Policy
1.4.1 Student Assessment and Awarding of Grades Higher Education Courses Policy
2.2.1 Respecting Diversity and Facilitating Access and Equity Policy and Procedure
2.3.4 Student Health and Wellbeing Strategy
6.2.1 International Student Refund of Fees Policy and Procedure
7.1.3 Engagement of Educational Agents Procedure
7.3.3 Student record management policy and procedures
Complaints and Appeals Register
Continuous Improvement Register
Risk Register
Child Safety Risk Register Stotts College (Acknowledge Education)
Emergency Management Plan (EMP)_Stott's College VCE
VCE-CC-03 Child Safety Code of Conduct
VCE-POL-01 Child Safety and Wellbeing Policy
VCE-GUI-06 Guidelines to responding to incidents, disclosures and suspicions of child abuse

10.0 Document Information

Document Name	Complaints and Appeals Policy and Procedure
Document Number	2.4.1
Purpose	This document articulates the Colleges' dedication to resolving complaints and appeals in a fair, transparent, and efficient manner.
Audience	☒Staff | ☒Students| ☒Public
Category	Learning Environment
Subcategory	Student Complaints and Appeals
Approval Date	22 January 2024
Effective Date	22 January 2024
Last date of approval	26 March 2026
Next Review Date	26 March 2028. Next scheduled review after 2 years from re-approval date
Policy Advisor	Head of Operations
Endorsing Bodies	Academic Board (Mandatory) VET Quality and Compliance Committee (Depending on nature of changes) VCE Quality and Compliance Committee (Depending on nature of changes)
Approving Authority	Board of Directors
Contact	Quality Assurance Regulator.compliance@ae.edu.au

11.0 Change Log

Date	Version	By	Notes
21/04/2026	1.2	HQR	• Added 6.6.1 regarding VCAA Appeals for breaches of VCAA examination rules or school-based assessment authentication rules (VCE Students)
16/04/2026	1.1	HQR	• Updated Student Complaints and Conduct Team / Committee to Student **Resolution** and Conduct Team / Committee • Revised Procedures to refer appeals of ITR directly to Stage 3 Appeal for the purposes of practicality and timely compliance reporting.
On 13/03/2026, the following policy documents were consolidated into this combined policy and procedure for AE / ICHM: • 2.4.1 Complaints and Appeals Policy (AE) • 2.4.2 Complaints and Appeals Procedure (AE) • ICHM Academic Grievance Policy • ICHM Non-Academic Grievance Policy Please refer to full change log in archived documents.			
13/03/2026	1.0	HQR	• As above, plus comprehensive review and strengthening of the policy and associated procedures, including clearer processes and defined timeframes for each stage of the complaints process. Stage 1 processes have been enhanced to better support early resolution through concerns and informal resolution mechanisms. The update also incorporates preliminary considerations relating to gender-based violence (GBV) to strengthen the framework for identifying and responding to such matters. • Additional updates made throughout following Governing Board feedback.

Appendix (Flowchart)

