

Complaints Handling Policy and Procedure

1. Purpose

The purpose of this policy is to establish a structured, transparent and fair complaints handling framework that ensures all complaints are managed effectively, resolved in a timely manner and used to inform continuous improvement.

Immaculate Education and Training recognises that complaints are an important source of feedback and provide valuable opportunities to improve services, systems and student outcomes. The organisation is committed to ensuring that all complainants are treated respectfully, fairly and without disadvantage when raising concerns.

This policy ensures that:

- Information about how to provide feedback and make complaints is publicly available and easily accessible
- Complainants are supported to provide feedback and make complaints
- Complaints are handled in accordance with procedural fairness and natural justice
- Reasonable timeframes are applied for responding to and resolving complaints
- Options for further action through independent third parties are available where complaints are not resolved internally
- Outcomes of complaints are documented and communicated to relevant parties
- Feedback and complaints are used to inform continuous improvement

This policy is implemented in accordance with:

- Standards for RTOs 2025 – Standard 2.7
- Australian Consumer Law

2. Legislative Requirements

This policy is designed to ensure compliance with the following legislative requirement:

Standards for RTOs 2025 – Standard 2.7

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The RTO demonstrates:

- (a) information about how to provide feedback and make complaints is publicly available and easily accessible
- (b) complainants are supported to provide feedback and make complaints
- (c) a complaints management system that:
 - (i) ensures parties are afforded procedural fairness
 - (ii) identifies reasonable timeframes for responding to and resolving complaints
 - (iii) provides avenues for further action where complaints are not resolved
- (d) outcomes of complaints are documented and communicated to relevant parties
- (e) feedback and complaints are used to inform continuous improvement

Immaculate Education and Training also acknowledges its obligations under the **Australian Consumer Law**, which ensures that services are provided with due care and skill and that complainants retain the right to pursue external remedies where required.

3. Scope

This policy applies to all stakeholders interacting with Immaculate Education and Training and outlines the organisation's approach to managing complaints across all areas of operations. The policy ensures that any individual or organisation engaging with the RTO has access to a fair and transparent complaints handling process.

This policy applies to, but is not limited to, the following stakeholders:

- **Current students** – individuals who are actively enrolled in a course and receiving training and/or assessment services
- **Prospective students** – individuals who are seeking information, applying for enrolment, or participating in pre-enrolment processes
- **Staff members** – all employees of the organisation, including administrative and support personnel
- **Trainers and assessors** – individuals responsible for delivering training and conducting

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assessment activities

- **Education agents (where applicable)** – third parties representing or promoting the organisation's courses or services
- **Third party service providers** – organisations or individuals delivering services on behalf of Immaculate Education and Training
- **Employers** – organisations or individuals engaging with the RTO for training, assessment or workforce development
- **Members of the public** – any individual who interacts with the organisation or is affected by its operations
- **Any other individual or organisation** interacting with the RTO in any capacity

This policy applies to complaints relating to all aspects of the organisation's operations, including but not limited to the following areas:

Training Delivery

Complaints relating to the delivery of training services, including the quality and effectiveness of training, trainer performance, delivery methods, scheduling, access to learning resources, and suitability of the learning environment.

Assessment Decisions

Complaints relating to assessment processes and outcomes, including assessment results, assessment methods, fairness and validity of assessment, feedback provided to students, and Recognition of Prior Learning (RPL) decisions.

Student Support Services

Complaints relating to the provision of student support, including academic assistance, language, literacy and numeracy support, accessibility of services, responsiveness of staff, and handling of student enquiries.

Administrative Processes

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Complaints relating to administrative functions, including enrolment procedures, fee management, issuance of certification documentation, record accuracy, and communication with students and stakeholders.

Staff Conduct

Complaints relating to the behaviour, professionalism and conduct of staff, including ethical behaviour, inappropriate conduct, discrimination, harassment, breaches of organisational policies, or conflicts of interest.

Facilities and Resources

Complaints relating to training facilities, equipment, learning infrastructure and resources, including suitability, accessibility, safety, and adequacy of physical or virtual learning environments.

Third Party Services

Complaints relating to services provided by third parties on behalf of Immaculate Education and Training, including training delivery, assessment services, partnership arrangements, and compliance of third-party operations.

Immaculate Education and Training remains responsible for ensuring that all third-party services meet regulatory and quality requirements and that complaints relating to such services are managed in accordance with this policy.

Exclusions

This policy does not replace other formal processes such as academic appeals, staff disciplinary procedures, or legal proceedings. However, complaints relating to these areas may initially be managed under this policy and referred to the appropriate process where required.

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4. Definitions

Complaint

A complaint is an expression of dissatisfaction with the organisation's services, staff, training, assessment, facilities, administrative processes or operations that requires formal resolution.

Complainant

A complainant is any individual or organisation making a complaint, including students, staff, employers, third parties or members of the public.

Procedural Fairness / Natural Justice

Procedural fairness requires that decisions are made impartially, transparently and based on evidence. All parties involved in a complaint must be given the opportunity to present their case, respond to allegations, and have their views considered before a decision is made.

Respondent

The person or party against whom a complaint has been made.

Independent Third Party

A person or organisation with no involvement in the complaint who is engaged to review the complaint in an impartial and objective manner.

5. Policy Statement

Immaculate Education and Training is committed to providing a fair, transparent, accessible and responsive complaints handling process that supports stakeholder confidence and promotes continuous improvement across all areas of operations.

The organisation recognises that complaints are a valuable source of feedback and play a critical role in identifying areas for improvement in training and assessment, student support, administrative processes, and organisational governance. All complaints are treated seriously, respectfully and without bias.

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Immaculate Education and Training ensures that all complainants are able to raise concerns without fear of disadvantage, victimisation or discrimination. Any individual who lodges a complaint in good faith will not be subject to any adverse treatment as a result of their complaint.

The organisation ensures that:

- No complainant is victimised, disadvantaged or treated unfairly for lodging a complaint
- Complaints are handled confidentially, and information is only disclosed to relevant personnel involved in the resolution process
- Complaints are managed in a consistent, impartial and unbiased manner
- All decisions are based on evidence and documented findings
- Complainants are informed in writing of the outcome and reasons for decisions
- Complaint records are securely maintained and access is restricted to authorised personnel
- Complaints are systematically reviewed and used to inform continuous improvement activities
- The complaints process is aligned with the principles of procedural fairness and natural justice
- All reasonable steps are taken to resolve complaints within defined and reasonable timeframes

This approach ensures compliance with Standards for RTOs 2025 – Standard 2.7, which requires that complaints are effectively managed, fairly assessed and used to inform continuous improvement.

6. Accessibility of the Complaints Process

Immaculate Education and Training ensures that the complaints handling process is clearly documented, publicly available and easily accessible to all stakeholders. The organisation is

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committed to ensuring that individuals understand how to lodge a complaint, what to expect during the process, and what outcomes may be available.

Information about the complaints process is made available through:

- The organisation's website
- Student Handbook
- Enrolment and induction materials
- Policy and procedure documents
- Direct communication with staff
- Orientation sessions (where applicable)

Complaints may be submitted through multiple channels to ensure accessibility and flexibility. These include:

- Written submission using the official complaint form
- Email communication
- Verbal communication to staff members
- Telephone communication
- Submission through an authorised representative

Where a complaint is made verbally, staff are responsible for documenting the complaint accurately and confirming the details with the complainant.

The organisation will provide reasonable assistance to individuals who require support in lodging a complaint, including assistance for those with language, literacy or accessibility needs.

7. Principles of Procedural Fairness

Immaculate Education and Training applies the principles of procedural fairness and natural justice at all stages of the complaints handling process to ensure that decisions are fair, reasonable and unbiased.

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The organisation ensures that:

- Complaints are handled by an independent and impartial person who is not directly involved in the matter
- All parties involved are given a fair opportunity to present their case and provide relevant information
- All relevant evidence is gathered, assessed and considered before a decision is made
- Decision-making is based on facts, evidence and organisational policies
- Individuals who are the subject of a complaint are informed of the allegations and given an opportunity to respond
- Both the complainant and respondent are treated with respect and without bias
- Decisions are communicated clearly, including reasons for the outcome
- Confidentiality is maintained throughout the process
- Any actual or perceived conflict of interest is identified and appropriately managed

Where a conflict of interest exists, the complaint will be escalated to another authorised person or referred to an independent third party.

8. Support for Complainants

Immaculate Education and Training recognises that the complaints process may be challenging for some individuals and is committed to providing appropriate support to ensure that complainants can participate effectively in the process.

Complainants are entitled to:

- Be accompanied by a support person at any stage of the complaints process
- Access assistance in preparing or lodging a complaint
- Receive clear and accurate information about the complaints process
- Receive updates on the progress of their complaint
- Request clarification of any part of the process or outcome
- Access further review options where applicable

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Support persons may include a friend, family member, colleague, advocate or support staff member. The role of the support person is to provide assistance and emotional support and not to act as a decision-maker unless formally authorised.

9. Informal Resolution

Immaculate Education and Training encourages the early resolution of issues wherever possible. Many concerns can be resolved quickly and effectively through open and respectful communication between the parties involved.

Informal resolution may include:

- Direct discussion between the complainant and the staff member involved
- Clarification of misunderstandings
- Immediate corrective action where appropriate
- Mediation facilitated by a staff member

Where a complaint cannot be resolved informally, or where the complainant is not satisfied with the outcome, the matter will proceed to the formal complaints process.

The availability of informal resolution does not limit or restrict the complainant's right to lodge a formal complaint at any time.

10. Complaint Handling Timeframes

Immaculate Education and Training is committed to resolving complaints as efficiently as possible while ensuring that all matters are properly investigated and considered.

The following timeframes apply:

- Written acknowledgement will be provided within 24 hours of receipt of the complaint
- Initial assessment and categorisation will occur within two (2) working days
- Investigation will commence within seven (7) calendar days

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- A written outcome will be provided within ten (10) to fourteen (14) working days
- Complaints will be finalised within thirty (30) calendar days

Where a complaint cannot be resolved within 30 calendar days:

- The complainant will be informed in writing
- Reasons for the delay will be clearly explained
- The expected timeframe for resolution will be provided
- Progress updates will be provided at least every fourteen (14) days

11. Complaint Handling Procedure

Immaculate Education and Training implements a structured complaints handling procedure to ensure all complaints are managed consistently, fairly, and within reasonable timeframes.

The process outlined below applies to all complaints received from students, staff, employers, third parties, or any stakeholder.

Step 1 – Receipt of Complaint

A complaint may be received in any format, including written, verbal, email, telephone communication, or through a third party. Staff receiving a complaint must treat the matter seriously and respectfully and ensure that the complainant is informed of the complaints process.

Where a complaint is made verbally, the staff member must document the details of the complaint, including:

- Name and contact details of the complainant
- Date and time the complaint was received
- Nature of the complaint
- Individuals involved (if applicable)
- Any supporting information provided
- Desired outcome (if stated)

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The complaint must then be forwarded to the Student Support Officer or designated responsible person for further action. Where the complaint involves serious allegations, it must be escalated immediately to the Chief Executive Officer.

Step 2 – Acknowledgement

Immaculate Education and Training will provide written acknowledgement of the complaint within 24 hours of receipt. The acknowledgement serves to confirm that the complaint has been received and is being reviewed.

The acknowledgement will include:

- Confirmation of receipt of the complaint
- Summary of the complaint (where appropriate)
- Outline of the complaints handling process
- Expected timeframes for investigation and resolution
- Contact details of the person managing the complaint
- Information regarding the complainant's rights and responsibilities

The acknowledgement will be provided via email or other agreed communication method.

Step 3 – Recording

All complaints will be formally recorded in the Complaints Register. The Complaints Register will include, at a minimum:

- Complaint reference number
- Date received
- Complainant details
- Nature of complaint
- Person receiving complaint
- Priority level
- Responsible officer
- Actions taken

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- Outcome
- Date finalised
- Continuous improvement actions (if applicable)

All supporting documentation related to the complaint will be stored securely in the designated complaints management folder.

Step 4 – Initial Assessment

Following receipt and recording of the complaint, an initial assessment will be conducted to determine the severity, urgency and nature of the complaint. This assessment will assist in determining the priority level and appropriate course of action.

The initial assessment will consider:

- Whether the complaint involves safety risks
- Whether the complaint involves misconduct or breach of policy
- The impact on students or stakeholders
- Whether immediate action is required
- Whether external authorities may need to be notified

Priority levels are defined as follows:

Critical – Matters involving safety risks, legal implications, serious misconduct, discrimination, harassment or issues that may cause significant harm. These complaints require immediate action.

High – Complaints with significant impact on training quality, student experience, or organisational operations.

Medium – Operational issues that require investigation but do not pose immediate risk.

Low – Minor administrative concerns or requests for clarification.

The priority level will determine the urgency and timeframe for investigation.

Step 5 – Investigation

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The complaint will be investigated by an independent and unbiased person who is not directly involved in the matter. The investigator may be the Training Manager, CEO, or another authorised person depending on the nature of the complaint.

The investigation may include:

- Reviewing relevant policies and procedures
- Examining documentation and records
- Interviewing the complainant
- Interviewing staff or other individuals involved
- Gathering supporting evidence
- Consulting subject matter experts if required

Where the complaint involves allegations against an individual, that person will be informed of the complaint and provided with an opportunity to respond.

All investigation activities will be documented.

Step 6 – Decision

Following the investigation, a decision will be made by the Chief Executive Officer or an authorised delegate. The decision will be based on:

- Findings of the investigation
- Relevant evidence
- Organisational policies and procedures
- Principles of procedural fairness
- Regulatory requirements (where applicable)

Possible outcomes may include:

- Complaint upheld
- Complaint partially upheld
- Complaint not upheld
- Corrective action required

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- Staff training or counselling
- Policy or process changes

The decision and reasoning will be documented.

Step 7 – Communication

The outcome of the complaint will be communicated to the complainant in writing. The communication will include:

- Summary of the complaint
- Summary of investigation undertaken
- Decision and reasons for the decision
- Actions to be taken (if applicable)
- Information on further review options
- Contact details for follow-up queries

The written response will be provided within the defined timeframe unless delays are communicated.

Step 8 – Implementation

Any corrective actions arising from the complaint will be implemented promptly. These actions may include:

- Changes to procedures
- Staff training
- Review of assessment practices
- Service improvements
- Administrative corrections

The responsible person will ensure that actions are completed and documented.

Step 9 – Continuous Improvement

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Immaculate Education and Training recognises that complaints provide valuable information for improving organisational practices. Following closure of the complaint:

- The complaint will be reviewed for systemic issues
- Opportunities for improvement will be identified
- Actions will be recorded in the Continuous Improvement Register
- Improvements will be monitored for effectiveness
- Trends in complaints will be analysed during management meetings

The complaint will only be closed once all actions have been implemented and recorded.

12. Independent Third-Party Review

Where a complainant is not satisfied with the outcome of the internal complaints process, they may request a review by an independent third party.

Immaculate Education and Training will:

- Facilitate the engagement of an appropriate independent reviewer
- Provide all relevant documentation required for the review
- Consider and implement the recommendations of the independent reviewer where appropriate
- Ensure the review process is conducted in accordance with procedural fairness principles

Immaculate Education and Training will bear the reasonable cost of engaging the independent third party to ensure that the complainant is not financially disadvantaged in accessing an independent review.

The independent third party must be impartial, have no prior involvement in the matter, and be suitably qualified or experienced to review the complaint.

The outcome of the independent review will be considered final within the organisation.

Following the completion of the independent review, any required corrective actions will be implemented and recorded in the Continuous Improvement Register.

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13. External Complaints Options

Immaculate Education and Training is committed to resolving complaints internally wherever possible. However, if a complainant remains dissatisfied after the completion of the internal complaints process, including any independent third-party review, the complainant has the right to refer the matter to an appropriate external body for further investigation.

The organisation will inform complainants of their right to access external complaint options and will provide relevant contact information where appropriate. Access to external complaint mechanisms does not limit the complainant's right to pursue other legal remedies.

Relevant external agencies may include, but are not limited to:

- **National Training Complaints Service** – for matters relating to vocational education and training services
- **Australian Skills Quality Authority (ASQA)** – for concerns about compliance with the Standards for RTOs and quality of training and assessment
- **Relevant state or territory consumer protection agencies** – for consumer related matters
- **Office of the Australian Information Commissioner** – for privacy-related complaints
- Any other relevant regulatory or dispute resolution body depending on the nature of the complaint

Immaculate Education and Training will cooperate fully with any external investigation. This includes:

- Providing requested documentation and records
- Responding to requests for information within specified timeframes
- Participating in any review or mediation process where required
- Implementing any recommendations or directions where appropriate

The organisation will also ensure that:

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- The complainant's enrolment or access to services is not affected during an external complaint process (where applicable)
- All relevant records relating to the complaint are maintained securely
- Any outcomes arising from external review are documented
- Improvement actions identified through external complaints are recorded in the Continuous Improvement Register

Where a complainant chooses to access an external complaint body, Immaculate Education and Training will continue to support the complainant and provide reasonable assistance in supplying documentation relevant to the complaint.

The organisation acknowledges that external complaint mechanisms form part of ensuring transparency, accountability and continuous improvement in service delivery.

14. Record Management

Immaculate Education and Training maintains comprehensive records of all complaints to ensure transparency, accountability and compliance with regulatory requirements. All complaint-related documentation is managed in a secure and confidential manner and is accessible only to authorised personnel involved in the complaints handling process.

Complaint records are maintained to provide evidence of procedural fairness, appropriate decision-making, and implementation of corrective actions. These records also support monitoring of trends and identification of continuous improvement opportunities.

Complaint records include, but are not limited to:

- Details of the complaint, including complainant information and nature of the issue
- Date the complaint was received and method of submission
- Investigation notes and findings
- Correspondence with the complainant and relevant parties
- Evidence gathered during the investigation
- Outcome of the complaint and reasons for the decision
- Corrective actions implemented

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- Continuous improvement actions identified
- Dates of resolution and closure
- Name of responsible officer managing the complaint

All complaint records are:

- Stored securely in electronic systems with restricted access
- Maintained confidentially to protect the privacy of all parties involved
- Accessible only to authorised staff members such as the CEO, Training Manager and Student Support Officer
- Maintained in accordance with organisational record management policies
- Protected against unauthorised access, alteration or disclosure
- Backed up regularly to prevent loss or damage
- Stored in clearly labelled folders for ease of retrieval and audit purposes

Where hard copy documentation is received, it will be scanned and stored electronically, and the original document securely retained where required.

15. Retention of Records

Immaculate Education and Training retains complaint records for a minimum period of five (5) years from the date of resolution to ensure compliance with regulatory requirements and to support organisational review and audit processes.

Records may be retained for a longer period where:

- Required by legislation
- Required for legal proceedings
- Required for ongoing regulatory investigation
- Identified as necessary for organisational risk management

During the retention period:

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- Records will remain securely stored
- Confidentiality will be maintained
- Access will be restricted to authorised personnel only

After the retention period has elapsed, records may be securely destroyed in accordance with the organisation's record destruction procedures. Destruction of records must be authorised by the Chief Executive Officer and carried out in a manner that preserves confidentiality.

16. Continuous Improvement

Immaculate Education and Training recognises complaints as an important source of feedback that contributes to continuous improvement of training, assessment and operational processes. Complaint outcomes are systematically reviewed to identify trends, recurring issues and opportunities for improvement.

The organisation analyses complaints data to:

- Improve training and assessment practices
- Enhance student support services
- Strengthen administrative and operational processes
- Improve communication with stakeholders
- Update policies and procedures where required
- Identify staff training and professional development needs
- Reduce the likelihood of recurrence of similar complaints
- Improve overall service quality and student experience

Where a complaint identifies an opportunity for improvement:

- The improvement action is recorded in the Continuous Improvement Register
- Responsibility for implementing the action is allocated
- A target completion date is assigned

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- Implementation is monitored for effectiveness
- Outcomes are reviewed in management meetings

The Continuous Improvement Register will record:

- Source of improvement (complaint reference)
- Description of issue identified
- Recommended action
- Responsible person
- Target completion date
- Status of implementation
- Review of effectiveness

Complaints and associated improvement actions are reviewed periodically by management to ensure that systemic issues are addressed and improvements are embedded into organisational practices.

Complaint records are not closed until any required continuous improvement actions have been considered

17. Responsibilities

Immaculate Education and Training assigns clear roles and responsibilities to ensure that complaints are managed effectively, fairly and in accordance with organisational policies and regulatory requirements. All staff are responsible for supporting the complaints handling process and ensuring that complaints are treated seriously and handled professionally.

Chief Executive Officer (CEO)

The Chief Executive Officer has overall responsibility for the implementation, monitoring and effectiveness of the complaints management system. The CEO ensures that complaints are handled in accordance with organisational policy, regulatory requirements and principles of procedural fairness.

The CEO is responsible for:

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- Ensuring the organisation maintains an effective complaints management system
- Ensuring compliance with the Standards for RTOs 2025
- Reviewing serious or complex complaints
- Making final decisions on complaint outcomes where required
- Approving escalation to independent third party review
- Appointing independent reviewers where applicable
- Ensuring corrective actions are implemented
- Monitoring trends in complaints and identifying systemic issues
- Authorising destruction of complaint records after retention period
- Ensuring complaints contribute to continuous improvement activities
- Reporting significant complaints to management where required

Training Manager

The Training Manager is responsible for managing complaints related to training and assessment and ensuring that academic concerns are investigated appropriately.

The Training Manager is responsible for:

- Investigating complaints relating to training delivery and assessment practices
- Reviewing assessment decisions where complaints are received
- Consulting with trainers and assessors during investigations
- Gathering relevant academic evidence
- Recommending corrective actions where required
- Implementing improvements to training and assessment practices
- Supporting procedural fairness during academic complaint investigations
- Providing investigation findings to the CEO
- Contributing to continuous improvement activities

Student Support Officer / Administration Officer

The Student Support Officer or Administration Officer is responsible for the administration of the complaints handling process and ensuring timely communication with complainants.

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Responsibilities include:

- Receiving complaints and ensuring they are documented
- Providing written acknowledgement within required timeframe
- Maintaining the Complaints Register
- Recording complaint details and updates
- Coordinating communication between parties
- Providing progress updates to complainants
- Assisting complainants in understanding the process
- Maintaining confidentiality of complaint records
- Ensuring documentation is stored securely
- Supporting implementation of corrective actions
- Updating the Continuous Improvement Register where required

Trainers and Assessors

Trainers and assessors play an important role in resolving complaints early and supporting the complaints process where required.

Trainers and assessors are responsible for:

- Attempting informal resolution of concerns where appropriate
- Reporting complaints to the Student Support Officer or management
- Cooperating with investigations
- Providing relevant documentation when requested
- Participating in corrective actions where required
- Implementing improvements to training delivery where identified

All Staff

All staff members are responsible for supporting the complaints handling process and ensuring that complaints are treated respectfully and professionally.

All staff must:

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- Direct complainants to the appropriate complaints process
- Treat complaints seriously and without bias
- Maintain confidentiality of complaint information
- Cooperate with investigations
- Provide accurate information when requested
- Support implementation of improvement actions
- Promote a culture of openness and continuous improvement

Complainant Responsibilities

Complainants are expected to:

- Provide accurate information about the complaint
- Participate in the process respectfully
- Provide supporting evidence where available
- Cooperate with reasonable requests for information
- Allow reasonable timeframes for resolution