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|  | Feedback and Complaints Policy and Procedure |
| | Version: 3.4 |
| Department: Sarina Russo Institute | Latest Amendment: 18/05/2023 |

Policy Statement

Sarina Russo Institute (SRI) is committed to developing and maintaining an effective, timely, fair and equitable complaints handling system which is easily accessible and offered at no charge. All SRI staff are responsible for ensuring that the policy is read, adhered to and publicised to all customers.

The procedures set out in this document do not replace or modify procedures or any other responsibilities which may arise under other policies or under statute or any other law. Nothing in this policy and procedure limits the rights of individuals to take action under Australia's Consumer Protection laws. Also, these procedures do not circumscribe an individual's rights to pursue other legal remedies.

Purpose

The policy ensures the principles of natural justice and procedural fairness are adopted at each stage of the complaints and appeals process.

Scope

This policy is designed to cover all complaints, including both academic and non-academic matters, such as:

- the enrolment, induction/orientation process;
- the quality of education provided;
- academic issues, including student progress, assessment decisions, curriculum and awards in a VET course of study;
- handling of personal information and access to personal records; and
- the way someone has been treated.


This policy is designed to cover all complainants, including:

- Individuals who are, or would be, entitled to VET Student Loans
- Individuals who are not eligible for VET Student Loans assistance
- Individuals who are classified as international students as defined by the Education Services for Overseas Students Act 2000
- Individuals who are Participants in the Career Transition Assistance (CTA) Program and Employability Skills Training (EST) Programs

Underpinning Legislation and Contractual Requirements

This Policy is underpinned by the:

- VET Student Loans Act 2016
- VET Student Loans Rules 2016
- VET Student Loans Manual for Providers
- National Code of Practice for Providers of Education and Training to Overseas Students 2018
- Workforce Australia – Career Transition Assistance Deed 2022 -2027
- Workforce Australia – Employability Skills Training Deed 2022 - 2027
- Standards for Registered Training Organisations (RTOs) 2015

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Definitions

Career Transition Assistance (CTA) is a Commonwealth Government Program designed to help people aged 45 years and over to improve their confidence and skills to become more competitive in the local labour market.


Employability Skills Training (EST) is a Commonwealth Government Program to help Participants become job ready by providing intensive pre-employment training including practical support to develop job search skills and workplace skills.

Policy

1. In the process of administering a feedback and complaints procedure, SRI will ensure that:
 - a. the complainant and any respondent will not be victimised or discriminated against;
 - b. the complainant has an opportunity to formally present their case and each party to a complaint may be accompanied and assisted by a support person at any relevant meetings;
 - c. complaints and requests for appeal are acknowledged in writing or by electronic means as soon as practicable;
 - d. the assessment of the complaint or appeal will be conducted in a professional, fair and transparent manner;
 - e. a full explanation in writing for decisions and actions taken as part of the process will be provided if so requested by the complainant or a respondent;
 - f. where the internal or external complaints handling or appeal process results in a decision that supports the complainant, SRI will immediately implement any decision and/or corrective and preventative action required and advise the complainant of the outcome;
 - g. there is no cost to the complainant to utilise this complaints procedure when lodged internally or externally;
 - h. complaints are resolved in a timely manner;
 - i. if more than 60 days are required to process and finalise the complaint or appeal, SRI will inform the complainant or appellant in writing including reasons why more than 60 calendar days are required and will regularly update the complainant or appellant of the progress of the matter;
 - j. parties who have utilised the complaints procedure are entitled to access records SRI has retained during that process. These records are otherwise kept confidential;
 - k. each party to the complaint has the right to be accompanied by a support person of their choosing at any stage, at that party's cost;


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- l. where a current student chooses to access this policy and procedure, SRI will maintain that person's enrolment while the complaints handling process is ongoing;
 - m. a written record of all complaints handled under this procedure and their outcomes shall be maintained for a period of at least five years to allow all parties to the complaint appropriate access to these records, upon written request to the RTO Director;
 - n. all records relating to complaints will be treated as confidential and will be covered by SRI's Privacy and Personal Information Procedures.
2. For individuals who are classified as international students, in addition to the above, the following will also apply:
- a. SRI will respond to any complaint or appeal the overseas student makes regarding his or her dealings with SRI, or SRI's Education Agents, or any related party that SRI has an arrangement with to deliver the overseas student's course or related services.
 - b. SRI will commence assessment of the complaint or appeal within 10 working days of it being made and finalise the outcome as soon as practicable.
 - c. SRI will ensure the overseas student is given a written statement of the outcome of the internal appeal, including detailed reasons for the outcome.
 - d. If the overseas student is not successful in SRI's internal complaints handling and appeals process, then SRI must advise the overseas student within 10 working days of concluding the internal review of the overseas student's right to access an external complaint handling and appeals process at minimal or no cost. SRI must give the overseas student the contact details of the appropriate complaints handling and external appeals body.
 - e. If the internal or any external complaints handling or appeal process results in a decision or recommendation in favour of the overseas student, SRI must immediately implement the decision or recommendation and/or take the preventive or corrective action required by the decision and advise the overseas student of that action.
3. For CTA and EST Participants, participants may also make a complaint directly to the Department's National Customer Service Line.


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Procedure

| Step | Action |
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| 1 | <p>Informal Complaint is received by SRI</p> <p>Complainants are encouraged, wherever possible, to resolve concerns or difficulties informally with the person(s) concerned. Staff are available to assist with the resolution of issues at this level. Complainants are encouraged to speak to staff members including their Teacher/Trainer, Student Services, Administration, Academic Counsellor, the nominated Senior Manager for the relevant program area, or their CTA Career Coach.</p> <p><i>If complaint is not resolved informally, proceed to Step 2.</i> <i>If complaint is resolved informally, END PROCESS.</i></p> |
| 2 | <p>A Formal Complaint is lodged with SRI</p> <p>A Formal Complaint may be lodged in a number of ways, including:</p> <ul style="list-style-type: none"> • By phone – 1800 078 776 • By email – <ul style="list-style-type: none"> ◦ VET@sri.edu.au; or ◦ english@sri.edu.au for SRI English students • By letter – using the below mail address: <p>Sarina Russo Institute RTO Director 349 Queen Street Brisbane QLD 4000</p> <p>Receipt of the complaint will be acknowledged in writing within <i>five working days</i>. The complaints handling process will commence within <i>ten working days</i> of the receipt of the Formal Complaint.</p> <p>The relevant Admin Team will lodge the Formal Complaint in the Feedback Register and update with the progress of the complaint as it progresses, including a statement of the outcome and reasons for the outcome.</p> <p>Where the feedback relates to CTA, the Admin Team will forward the complaint on to the CTA Program Coordinator.</p> <p><i>Proceed to Step 3.</i></p> |
| 3 | <p>Complaint investigated, and formal response provided</p> <p>The RTO Director, or their nominee (who must be independent of the complaint), will then seek to clarify the outcome that the complainant hopes to achieve.</p> |

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| | <p>Such clarification may be sought by written or verbal request or by a face-to-face interview with the complainant. When such clarification occurs in a face-to-face interview, both the complainant and any respondent may ask another person to accompany them (at the requesting party's cost).</p> <p>The RTO Director or their nominee will endeavour to resolve the complaint and will provide a written report to the complainant within <i>20 working days</i> of receipt of the complaint on the steps taken to address the complaint and the reasons for the decision made.</p> <p>The report will further advise the complainant of their right to access the internal appeals process if they are not satisfied with the outcome of their formal complaint.</p> <p><i>If complainant is dissatisfied with formal response, proceed to Step 4.</i> <i>If complainant is satisfied with formal response, proceed to Step 7.</i></p> |
| 4 | <p>Complainant lodges Internal Appeal</p> <p>If a complainant is dissatisfied with the outcome of their Formal Complaint, they may lodge an appeal with the Education Group CEO (who is senior to the original decision maker) within <i>20 working days</i> of receiving notification of the outcome of their formal complaint.</p> <p>Appeals must be submitted in writing (including by email) and marked to the attention of the CEO by the contact method provided in the initial response.</p> <p><i>Proceed to Step 5.</i></p> |
| 5 | <p>Appeal investigated, and formal response provided</p> <p>The Education Group CEO will appoint an appropriate person or committee (who is independent from the complaint) to consult with the complainant and other relevant parties within <i>ten working days</i>.</p> <p>Where possible such consultations should take the form of face-to-face interviews. Both the complainant and any respondent may ask another person to accompany them to these interviews (at the requesting party's cost).</p> <p>Following the consultation, the CEO, or their nominee, will provide a written report to the complainant within <i>20 working days</i> of receipt of the appeal, or <i>10 working days</i> of its conclusion (whichever is sooner) advising the further steps (if any) taken to address the complaint, the reasons for the decision, and the complainants right to access the external appeals process if they are not satisfied with the outcome of their internal appeal.</p> <p><i>If complainant is dissatisfied with the formal response to their internal appeal, proceed to Step 6.</i> <i>If complainant is satisfied with the formal response to their internal appeal, proceed to 7.</i></p> |

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| 6 | <p>Complainant lodges External Appeal</p> <p>If the complainant is dissatisfied with the outcome of their appeal, they may lodge an external appeal with the Queensland State Ombudsman. For information and contact details please visit www.ombudsman.qld.gov.au. There is no fee for this service.</p> <p>Each party to the external appeal process may ask another person to accompany them during any stage of this review (at the requesting party's cost).</p> <p>For international students, an external appeal can be lodged with the Overseas Student Ombudsman. The use of this service is free. For more information and contact details, please visit http://www.ombudsman.gov.au/How-we-can-help/overseas-students</p> <p>For CTA, Complainants may make an external complaint via the Departments National Customer Service Line 1800 805 260 or nationalcustomerservice@employment.gov.au.</p> <p>At the conclusion of the external appeal process each party will receive a written notice of the decision on review, including the reasons for the decision.</p> <p><i>Proceed to Step 7.</i></p> |
| 7 | <p>Implementation of processes</p> <p>SRI will implement any decisions made following a formal complaint to the company's policies and procedures.</p> <p><i>End Process.</i></p> |

Summary

| Complaints and Appeals Procedure | |
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| | 1. Talk to a staff member |
| If unhappy | 2. Write down your problem and submit your formal written complaint to RTO Director |
| If unhappy | 3. Lodge appeal to the Chief Executive Officer (CEO) |
| If unhappy | 4. Contact an independent external body – Resolution Institute/Student Ombudsman |