

COMPLAINTS HANDLING POLICY & PROCEDURE

Document Control

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Standards & Legislation Mapping

This policy declares the specific requirements it gives effect to under Britts College's self-assurance obligations.

Framework	Reference(s)
Standards for RTOs 2025	Quality Area 2 (VET Student Support) – Outcome Standard 2.7 (effective feedback and complaints management addresses concerns and informs continuous improvement); Quality Area 4 (Governance) – Standard 4.2 (roles and responsibilities) and Standard 4.4 (self-assurance monitoring).
National Code 2018	Standard 10 (Complaints and appeals) – Britts College maintains an accessible internal complaint handling and appeals process, and the option of an external, independent review, for overseas students.
ESOS Act 2000	The framework establishing Britts College's obligations to overseas students, under which complainants must be afforded accessible, fair and timely complaint handling.
Other legislation	Privacy Act 1988 (Cth) – confidential handling of personal information collected from complainants and other parties during the complaint handling process.

Quality Area key: QA1 Training & Assessment · QA2 VET Student Support · QA3 VET Workforce · QA4 Governance.

1. Purpose

The purpose of this policy and procedure is to ensure:

- information about how to provide feedback and make complaints is publicly available and easily accessible;
- complainants are supported to provide feedback and make complaints;
- persons making a complaint are afforded procedural fairness;
- complaints are handled within a reasonable timeframe for responding to and resolving complaints;
- options for further action through relevant third parties are provided where complaints are not resolved;
- outcomes of complaints are documented and communicated; and
- feedback and complaints are used to inform continuous improvement and prevent recurrence.

2. Scope

This policy applies to:

- all complaints received by Britts College, in any form, from any complainant – including students, staff, trainers or any other associated person;
- all staff, trainers, assessors and management involved in receiving, handling, resolving or reviewing complaints; and
- all delivery locations and modes.

This policy applies equally to complaints from domestic and overseas (CRICOS) student cohorts. There are no differing complaint handling obligations for CRICOS students; however, accessible, fair and timely complaint handling directly supports Britts College's obligations to overseas students under the ESOS framework and the National Code 2018.

3. Definitions

Term	Definition
Complainant	The person making a complaint. This may be a student, employer, trainer or any other person, and is not limited to complaints made by students only.
Complaint	Generally, negative feedback about services or people which has not been resolved locally.
Procedural fairness	The requirement that a complaint is handled by an unbiased person, that all parties are given an opportunity to be heard, that like complaints are treated consistently, and that complainants are informed of any outcome before it is implemented.
Natural justice	The principle that decision-making is fair and reasonable, observed where a decision affects the rights, interests or legitimate expectations of individuals.
Third-party review	A review of a complaint outcome by a body or person independent of Britts College, available where the complainant is not satisfied with the internal handling of the complaint.
Complaints and Appeals Register	The controlled record that identifies the complainant, their relationship with Britts College, the nature of the complaint, findings/outcomes, any link to continuous improvement, and the dates received and closed.
Continuous Improvement (CI) Report / Register	The controlled record and central register used to log, track and close out opportunities for improvement identified through complaint handling and other quality assurance activities.

4. Policy Statement and Principles

Britts College is open to receiving feedback and complaints and is committed to providing a fair and transparent complaint handling process. Britts College's approach is guided by the following principles:

- **No detriment.** There is no detriment to people who complain.
- **Receptive, blame-free culture.** Britts College fosters a culture that is open to feedback and improvement.

- **Multiple avenues.** A range of avenues is provided through which people may make complaints — for example via email, or verbally to trainers, the Student Support Officer or other relevant staff.
- **Transparency.** Information on the complaints handling process is publicly available on the Britts College website and in the Student Handbook, setting out how complaints are handled, what complainants can expect, and expected timeframes for resolution.

Britts College implements the following mechanisms to ensure **procedural fairness** when handling complaints:

- the complaint is handled by an unbiased person;
- both the complainant and the subject of the complaint (where this is a person) are given an opportunity to be heard and to provide relevant information;
- similar complaints are treated in a consistent manner to ensure fairness and reliability in the resolution process;
- a person making a complaint is informed of any outcome or decision before the decision is implemented and has the option to respond; and
- the privacy of complainants is protected, and the information included in a complaint is kept confidential.

5. Legislative and Regulatory Framework

This policy gives effect to Britts College's obligations under the following instruments:

- **Standards for RTOs 2025** — Outcome Standard 2.7, which requires that effective feedback and complaints management addresses concerns and informs continuous improvement.
- **National Code 2018** — Standard 10, which requires an accessible internal complaints and appeals process and the option of independent external review for overseas students.
- **ESOS Act 2000** — the framework under which Britts College's obligations to overseas students, including fair and timely complaint handling, arise.
- **Privacy Act 1988 (Cth)** — governs the confidential handling of personal information collected during the complaint handling process.

6. Roles and Responsibilities (RACI)

Britts College does not have a governing board. Control and influence over Britts College, and all decision-making authority, rest solely with the CEO and the Director. Accountability under this policy therefore sits exclusively with the CEO and the Director; all other roles are responsible for carrying out activities, or are consulted or informed, under the direction of the CEO and the Director.

R Responsible (does the work) **A** Accountable (owns the outcome – one per row) **C** Consulted **I** Informed

Activity / Decision	CEO / Director	Training Manager / Compliance	Student Support Officer	Trainers & Assessors	Admin / Office Support	Independent Third Party
Approve this policy	A	R	I	I	I	—
Make complaints information publicly available	A	R	C	I	R	—
Receive complaint	A	C	R	C	C	—
Acknowledge receipt (within 24 hours)	A	C	R	I	C	—
Assess, categorise and prioritise complaint	A	C	R	I	I	—
Record complaint in the Complaints and Appeals Register	A	I	R	I	C	—
Review and investigate complaint	A/R	C	R	C	I	—
Provide regular updates to the complainant	A	I	R	I	C	—
Give the subject of a complaint the opportunity to respond	A	C	R	I	I	—
Refer matters to police / external authorities (if applicable)	A/R	C	I	I	I	—

Activity / Decision	CEO / Director	Training Manager / Compliance	Student Support Officer	Trainers & Assessors	Admin / Office Support	Independent Third Party
Determine response and communicate outcome (within 30 days)	A/R	C	C	I	I	—
Facilitate independent third-party review (if required)	A/R	I	C	I	I	R
Implement outcome and advise complainant	A	C	R	I	C	—
Record-keeping, retention and evidence	A	C	R	I	C	—
Identify and implement continuous improvement actions	A	R	C	C	I	—

7. Procedure / Policy in Practice

7.1 Early resolution of complaints

In all cases, issues that arise during training and assessment that are a source of frustration or are in dispute should be resolved at the time they occur between the persons involved. It is often the case that complaints can be avoided by proper communication and respect between the persons involved. Where the issue cannot be resolved locally, a complaint is to be made in accordance with the following section.

7.2 Making a complaint

A complaint may be received by Britts College in any form and does not need to be formally documented by the complainant in order to be acted on. Complaints may be made by any person. The complaints policy must be publicly available — it is published on the Britts College website and communicated to complainants within the Student Handbook.

Complaints are to be handled in the strictest confidence. No Britts College representative is to disclose information to any person without the permission of the CEO. A decision to release information to third parties can only be made after the complainant has given written consent.

Britts College shall maintain the enrolment of the complainant during the complaint handling process. The complainant is entitled to be heard with access to all relevant information and with the right of reply, ensuring procedural fairness is applied at every stage of the complaint process. The complainant may be accompanied and/or assisted by a support person at any relevant meeting. Where the complainant is a child or young person, they may be accompanied by a family member or carer at any relevant meeting.

7.3 Communicating the complaint handling policy and procedure

The complaints handling policy will be:

- publicly available on the Britts College website;
- integrated into the Britts College Student Handbook; and
- included in the Britts College policies and procedures.

Complainants are also encouraged to provide feedback to their trainer, the Student Support Officer or any other Britts College staff member at any time, as outlined in the Student Handbook and the Continuous Improvement Policy and Procedure.

7.4 Complaint handling timeframe

Britts College is committed to resolving complaints in a reasonable timeframe and without unnecessary delay. While all complaints are responded to in a timely manner, some may require more urgent attention, and some may take longer to resolve than others.

- **Written acknowledgement** – provided no later than 24 hours from the time the complaint is received. The acknowledgement assures the complainant that the complaint has been received and will be reviewed and informs them that they will receive a written response.
- **Initial assessment and categorisation** – conducted within 2 working days, triaging complaints by severity, urgency and nature, and prioritising cases that need immediate attention.
- **Handling the complaint** – complaints categorised as severe with a critical priority rating are acted on immediately. Handling of all complaints commences within seven (7) calendar days of lodgement, with a written response provided within fourteen (14) calendar days of lodgement.
- **Regular updates** – the complainant is provided with updates at a minimum of two (2) weekly intervals.

- **Assessment criteria.** The initial assessment and categorisation considers:
- **Severity** – whether the complaint involves safety, harassment, discrimination or legal concerns requiring urgent action.
- **Urgency** – how soon the issue needs to be resolved, including impacts on ongoing training or reputation.
- **Nature** – whether it relates to training and assessment, trainer behaviour, administrative issues or facilities.
- **Prioritisation.** A priority level is assigned based on the assessment:
- **Critical** – complaints with legal or safety implications, or those that could harm complainants' well-being.
- **High** – issues with significant impact on training quality or participant experience, such as trainer behaviour or course content.
- **Medium** – less urgent issues, such as scheduling or minor logistical concerns.
- **Low** – minor complaints, often administrative or preference-based, which do not require immediate resolution.

Complaints must be resolved to a final outcome within thirty (30) calendar days of the complaint being initially received. Where the CEO considers that more than 30 calendar days are required, the CEO must inform the complainant in writing – including the reasons why – and maintain regular fortnightly contact with the complainant, including to explain any further delays.

7.5 Principles of natural justice and procedural fairness

A complainant is to be provided an opportunity to formally present their case at no cost. The principles of natural justice and procedural fairness must be incorporated into the complaint handling process to ensure decision-making is fair and reasonable. The following principles apply:

CEO and bias. Where the CEO feels there may be bias or a perception of bias, or where the complainant is not satisfied with how the matter has been handled, the complainant is to be referred directly to an independent third party for consideration and response.

Responding to allegations. Where a complaint involves one person making allegations about another, Britts College must hear both sides before making any judgement. A person affected

by a decision has the right to be fully informed of any allegations and given adequate opportunity to be heard and respond, including the right to:

- put forward arguments in their favour;
- show cause why a proposed action should not be taken;
- deny allegations;
- call for evidence to disprove allegations and claims;
- explain allegations or present an innocent explanation; and
- provide mitigating circumstances.

Britts College must fully consider the substance of allegations and the response provided before making a decision. Decisions must be communicated in writing to the complainant and to any person subject of allegations, including advice of their right to seek a third-party review.

Referring matters to authorities. Where an allegation involves alleged criminal or illegal activity considered outside the scope and expertise of Britts College to investigate, Britts College reserves the right to report the allegations to law enforcement authorities. Persons related to the matter will be advised in writing if this course of action is taken.

Third-party review. Where the complainant is not satisfied with Britts College's handling of the matter, they may have an independent body or person review the complaint following completion of the internal process. The complainant should first allow Britts College to fully consider and respond to the complaint in writing. If still not satisfied, they may request an independent review by informing the Office Manager, who will initiate the process with the CEO. The CEO will appoint an appropriate independent party, who is required to respond with recommendations within fourteen (14) working days. This advice is accepted by Britts College as final, advised to the complainant in writing and implemented without prejudice. Where Britts College engages an independent reviewer, it will meet the full cost of the review.

7.6 Unresolved complaints

Once the complaint handling process has concluded, where the complainant remains dissatisfied with the outcome, they are to be advised of their right to refer the matter to any relevant external authority or agency. The following external agencies are nominated in the first instance as relevant points of referral:

- In relation to consumer-related issues — the Office of Fair Trading.

- In relation to the delivery of training and assessment services – the National Training Complaints Service (13 38 73, dewr.gov.au/national-training-complaints-hotline) or the Australian Skills Quality Authority (asqaportal.asqa.gov.au/Make-a-Report).
- In relation to privacy matters – the Office of the Australian Information Commissioner (oaic.gov.au or 1300 363 992).

This guidance is also communicated to complainants within the Student Handbook and the publicly available policies and procedures on the Britts College website. Britts College will cooperate fully with agencies such as the National Training Complaints Service, the Office of Fair Trading or ASQA that may investigate the handling of a complaint, and will ensure the complainant is provided with a written response they may use for this purpose.

7.7 Complaint handling procedure steps

Step	Action	Responsible
Step 1- Inform complainants of the process	Publish the complaints handling policy and procedure on the website and provide it to complainants in the Student Handbook.	CEO
Step 2- Receive complaint	A complaint may be received in any form (written or verbal); complainants are encouraged to complete the Complaint Form available on the website or from the office. There is no time limitation on making a complaint. Where a complainant has difficulty, they are advised to contact Britts College immediately.	Student Support Officer
Step 3- Acknowledge receipt	Provide written acknowledgement as soon as possible and no later than 24 hours from receipt, informing the complainant they will receive a written response within 14 days and explaining the process and their rights and obligations.	Student Support Officer
Step 4- Determine handling priority	Conduct initial assessment and categorisation within 2 working days based on severity, urgency and nature, and assign a priority level (critical, high, medium, low).	Student Support Officer
Step 5- Record complaint	Enter the complaint into the Complaints and Appeals Register, recording the complainant, nature of complaint, findings/outcomes, links to continuous improvement, and dates received and closed. Check for any prior or duplicate submission. Store records securely.	Student Support Officer/ Campus Manager

Step	Action	Responsible
Step 6- Review and investigate	Forward the complaint to the CEO for review. The CEO determines whether further investigation or consultation is required or whether the matter can be resolved internally.	Student Support Officer, CEO
Step 7- Keep the complainant up to date	Provide regular updates not less than every two weeks advising the complainant of the status and progress of the complaint.	Student Support Officer, CEO
Step 8- Give opportunity to respond (if applicable)	Where a complaint involves allegations about another person, inform that person and provide them the opportunity to respond and present information in response to the issues raised.	CEO, Student Support Officer
Step 9. Refer to police (if applicable)	Where a complaint involves allegations of criminal conduct, recommend the complainant refer the matter to the relevant State or Territory Police Service.	CEO
Step 10. Determine and communicate response	The CEO reviews the outcomes of the investigation and determines the response within 30 days, communicating the findings and outcomes using the Complaints Response Letter template.	CEO
Step 11. Independent third-party review (if required)	Where the complainant is not satisfied, an independent third party may review the complaint and respond with recommendations within fourteen (14) calendar days. Advise the complainant using the Third Party Written Acknowledgement template.	CEO, Independent Third Party
Step 12. Implement response and advise complainant	Implement decisions or outcomes immediately and advise the complainant in writing using the Complaints or Appeals Response letter.	Student Support Officer
Step 13. Obtain written acknowledgement	Request written acknowledgement from the complainant once the complaint has been resolved.	Student Support Officer
Step 14. Consider opportunities for improvement	Record any opportunities for improvement in a Continuous Improvement Report for consideration at a future management meeting.	Student Support Officer, Campus Manager, CEO
Step 15. Document response	Update and record the complaint in the Complaints and Appeals Register, retaining all associated documents including records of continuous improvement.	Student Support Officer

8. Records Management

Records relating to complaints exist in two formats: electronic records (email correspondence and documents communicated electronically) and hard-copy records submitted by the complainant or generated by Britts College. A record of each complaint is also maintained within the complaints management system, including the complaint details, a diary log recording progress and closure, and identified opportunities for improvement.

All records, regardless of format, are saved in digital format into a secure folder on Britts College's file storage. Each file is clearly labelled with the document title or subject and the date received or generated. The folder is only accessible to persons authorised by the CEO, and records in the complaints management system are accessible only to administrators and managers. To ensure records are maintained safely:

- records are kept securely to prevent access by non-authorised personnel;
- records are kept confidential to safeguard information and protect complainants' privacy;
- records are protected against damage by fire, flood, pests or other hazards; and
- electronic data is protected against destruction and single device failure and is backed up off site.

A correspondence record is made for each complainant, with all email and letter communication retained within the complaint handling file.

Retention. Britts College retains records relating to complaints handling for a minimum of five (5) years. **Destruction.** Only the CEO can authorise (in writing) the destruction of complaint handling records, and only after the retention period has lapsed.

9. Monitoring, Review and Continuous Improvement

- Frequently, the complaint handling process exposes weaknesses in training and assessment or administrative systems that flow into the continuous improvement system as opportunities for improvement. Complaints should be seen in a positive light and as opportunities for improvement.
- At the end of each complaint, consideration is given to opportunities for improvement that can be applied to prevent recurrence, recorded in the Continuous Improvement Register as a standing agenda item at management meetings.

- An internal audit is conducted at least annually to confirm compliance with this policy and relevant legislative and regulatory requirements.
- This policy is reviewed at least every two years, and sooner where changes to the Standards, legislation, regulatory guidance or practice indicate revision is required. Revisions are approved by the CEO and recorded in the Document Control table.

Self-assurance review questions:

- How are complaints acknowledged, categorised and resolved within the required timeframes?
- How is procedural fairness demonstrated across the handling of individual complaints?
- How is feedback from complaints used to inform actual changes to training, assessment and administration?
- How is the effectiveness of improvement actions, once acted on, verified?

Consequences of non-compliance:

- For Britts College — breaches of legislation or regulatory requirements may result in regulatory action by ASQA and reputational damage.
- For staff — disciplinary action, which may include formal warnings, suspension or termination of employment, where complaint handling obligations are not met.

10. Related Documents

Policies:

- Management Meeting Policy and Procedure
- Third Party Management Policy and Procedure
- Continuous Improvement Policy and Procedure

Forms:

- Complaint Form
- Complaints and Appeals Register
- Complaints Response Letter template
- Continuous Improvement Report / Register

11. Approval

This policy is approved by the Chief Executive Officer of Britts College. Approval of each version is recorded in the Britts College Policy Register.