Complaints Policy

The purpose of this policy is to ensure that all complaints raised by students, personnel, and other stakeholders are handled in a fair, transparent, and consistent manner. The policy aims to promote a culture of integrity and continuous improvement.

This policy applies to all complaints received from students, personnel, industry partners, and other stakeholders regarding the services, operations, or conduct of the organisation. This policy and processes implemented are aligned to requirements outlined in *ISO 10002:2018 Quality management – Customer satisfaction – Guidelines for complaints handling in organizations.*

The organisation is committed to providing a safe, supportive, and high-quality environment for all stakeholders. All complaints will be managed professionally, confidentially, and in accordance with the principles of natural justice, ensuring that complainants and respondents are treated fairly and respectfully.

Scope – domestic VET students

This policy applies to Shafston School of Business domestic VET students, prospective students, former students, parents/guardians and authorised representatives, employees, trainers/assessors, partner schools and third parties delivering or supporting services on Shafston's behalf. It covers school-based, on-campus, virtual, workplace-based and third-party delivery.

Complaints can concern training and assessment experiences, student support, delivery arrangements, trainer conduct, marketing, enrolment, fees, credit transfer, RPL, discrimination, bullying, child safety and the conduct of students or third parties. Appeals against decisions are handled under POL003 Appeals Policy. Workplace grievances may also be managed under relevant HR/WHS procedures.

Guiding Principles

Anyone may raise a psychosocial safety concern through their manager, nominated support contact or an alternative senior contact outside the reporting line where that manager is involved. Shafston responds to immediate risks first, offers support, protects against victimisation and handles reports impartially. Information is shared only as needed for safety, lawful reporting and procedural fairness; absolute confidentiality is not promised. Hazard control does not wait for a formal grievance or a substantiated misconduct finding.

Psychosocial safety reports are handed promptly to the WHS Lead or deputy for immediate protection, hazard controls and required notifications under the Work Health and Safety Policy. These actions proceed alongside the complaints process and do not depend on a formal complaint or substantiation. A report involving the CEO is referred to the governing body or proprietor for an independent response.

Shafston's complaints process and appeals process (refer Appeals Policy) reflects the fourteen (14) guiding principles as outlined in ISO 10002:2018.

Commitment	The organisation is actively committed to defining and implementing a complaints-handling process.
Capacity	Sufficient resources are made available for and committed to complaints handling and are managed effectively and efficiently.
Transparency	The complaints-handling process is communicated to customers, personnel and other relevant interested parties. Individual complainants are provided with adequate information about the handling of their complaint.

Accessibility	The complaints-handling process is easily accessible to all complainants. Information is made available on the details of making and resolving complaints. The complaints-handling process and supporting information is easy to understand and use. The information is in clear language. Information and assistance in making a complaint is made available, in whatever languages or formats that services are offered or provided in, including alternative formats, such as large print, Braille, or audiotape where requested, so that no complainants are disadvantaged.
Responsiveness	The organisation addresses the needs and expectations of customers with respect to complaints handling.
Objectivity	Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process. Please refer to the principles of objectivity below for further information.
Charges	Access to the complaints-handling process is free of charge to the complainant.
Information integrity	The organisation ensures that the information about its complaints handling is accurate and not misleading, and that data collected are relevant, correct, complete, meaningful and useful.
Confidentiality	Personally identifiable information concerning the complainant is available where needed, but only for the purposes of addressing the complaint within the organisation and is actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure or disclosure is required by law.
Customer-focused approach	The organisation adopts a customer-focused approach with respect to handling complaints and is open to feedback.
Accountability	The organisation has established and maintains accountability for, and reporting on, the decisions and actions with respect to complaints handling.
Improvement	Increased effectiveness and efficiency of the complaints-handling process is a permanent objective of the organisation.
Competence	Organisation personnel have the personal attributes, skills, training, education and experience necessary to handle complaints.
Timeliness	Complaints are handled as expeditiously as feasible given the nature of the complaint and of the process used.

Shafston complaints process is free, and easily available, to manage and respond to allegations involving the conduct of:

- Shafston, its trainers, assessors or other personnel, or
- A Shafston contracted third party providing services of Shafston, including the third-party representatives' trainers, assessors or other personnel, or
- A student of Shafston.

Feedback management (Outcome Standard 2.7)

Students and stakeholders can offer feedback informally or formally through trainers, the VET Manager, school contacts, surveys, telephone, email or other accessible communication channels. Shafston provides assistance for language, disability, literacy, age and digital-access needs. Feedback does not need to become a formal complaint to be considered.

The VET Manager ensures feedback is captured in a feedback register or other approved continuous-improvement record, triaged for urgency, reviewed for trends and assigned to an owner when follow-up is required. Action taken, dates, feedback to the person where appropriate, and closure are documented. Feedback and complaints are analysed in management reviews and inform improvements to learning resources, delivery, assessment, services and third-party oversight.

Objectivity

Shafston is committed to the principles for objectivity in the complaints-handling process.

Openness	Well publicised, accessible, and understood by those involved in a complaint. The process is clear and well publicised so that both personnel and complainants can follow.
Impartiality	Avoiding any bias in dealing with the complainant, the person complained against, or the organisation. The process is designed to protect the person complained against from any biased treatment. Emphasis is placed on solving the problem and not on assigning blame. If a complaint is made about personnel, the investigation is carried out independently.
Confidentiality	The process is designed to protect the complainant's and customer's identity, as far as is reasonably possible. This aspect is very important to avoid deterring possible complaints from people who might be afraid that giving details could lead to inconvenience or discrimination.
Accessibility	The organisation sallow the complainant access to the complaints-handling process at any reasonable point or time. Information about the complaints process is readily available in clear language and in formats accessible to all complainants. When a complaint affects different supply chain participants, a plan to coordinate a joint response is made. The process allows any information arising from the complaints to be known by any suppliers of the organisation that are concerned by the complaint so that they are able to make improvements.
Completeness	Finding out the relevant facts, talking to people from both sides involved in the complaint to establish a common ground, and verifying explanations, whenever possible.
Equitability	Giving equal treatment to all people.
Sensitivity	Each case is considered on its merits, paying due care to individual differences, and needs and expectations.

School-based delivery, minors and parents/guardians

For students undertaking VET at a partner secondary school, a complaint can be made directly to Shafston, through the student's Trainer or the nominated school VET coordinator. Shafston remains responsible for complaints about training and assessment or services delivered on its behalf; school referrals must not delay Shafston's receipt, triage or investigation.

Students under 18 may lodge complaints independently and may choose a parent, guardian, school staff member or another support person to assist. Shafston will offer age-appropriate information and support, involve parents/guardians where appropriate and lawful, and consider the student's safety, maturity, wishes, privacy and any mandatory reporting responsibilities. Parental consent or participation is not a precondition to reporting safety issues. Where the complaint concerns a parent or guardian, information will not automatically be shared with that person.

Child safety or wellbeing allegations and immediate risks are referred without delay to the relevant child-safety/WHS lead and managed alongside this process, including any mandatory reporting or school notification obligations. A student is not required to confront an alleged perpetrator before lodging a formal complaint.

Where a school or third-party trainer/assessor is involved, the VET Manager liaises with the provider/school, ensures allegations and evidence are appropriately managed, checks conflicts of interest and documents Shafston's investigation, decision and communications. Confidentiality applies on a need-to-know basis.

Objectivity for Personnel

Complaints-handling procedures ensure that those complained against are treated objectively. This includes:

- Informing them immediately and completely on any complaint about their performance.
- Giving them the opportunity to explain the circumstances and allowing them appropriate support.
- Keeping them informed of the progress in the investigation of the complaint and the result.

It is vital that those against whom a complaint has been made are given full details of the complaint before they are interviewed. However, confidentiality should be observed.

Shafston personnel are reassured that they are supported by the process. Personnel are encouraged to learn from the complaints-handling experience and to develop a better understanding of the complainant perspectives.

The complaints-handling process ensures confidentiality in the case of complaints against personnel. The details of such complaints are known only by those directly concerned.

Complaints Process Approach

Shafston is open to receiving feedback and complaints and ensures information about how to provide feedback and make complaints is publicly available and easily accessible, including via the Shafston **Student Handbook** and website. Where Shafston uses third parties to deliver services, the organisation ensures complaints information is also made available to prospective clients.

The organisation takes a best practice approach that:

- Fostering a receptive, blame-free culture that is open to feedback and improvement.
- Ensures there is no detriment to people who complain.
- Makes it easy and accessible for people to provide feedback and make complaints.

Students are supported to provide feedback and make complaints. Allowing students to easily engage with the personnel of Shafston about any concerns they have can stop minor issues becoming larger. There are a range of avenues through which complaints can be made. This includes in person made directly to Shafston representatives, via phone or in writing, including via email or Shafston website.

The organisation actively seeks to remove any barriers to making complaints and any fear of repercussions to the complainant.

Complaints are handled impartially, with respect for all parties involved, reflecting procedural fairness and natural justice.

Shafston personnel are well trained and supported to manage complaints, acknowledging promptly and providing timely responses.

Complaints are resolved without unnecessary delay. Shafston recognises that some complaints may require more urgent attention than others, and that some complaints may take longer to resolve than others. Shafston's process includes triaging complaints where needed.

The organisation communicates transparently with stakeholders about the expected timeframes for acknowledging, resolving and communicating the outcomes of complaints. In any situation where timeframes are not being met (because the complaint is taking longer to resolve than anticipated) Shafston maintains regular contact with the complainant including to explain any delays.

All complaints are handled by an unbiased person.

Shafston will offer culturally safe and respectful complaint handling and seek appropriate culturally informed support or advice when requested or needed, with consent and appropriate privacy protections. Any specialist involvement will be arranged and documented on a case-by-case basis.

Shafston ensures the privacy of complainants, and the confidentiality of information included in a complaint.

Reflecting the principles of natural justice and procedural fairness, both the complainant(s) and the subject(s) of each complaint are given an opportunity to be heard and to provide relevant information before a decision is made.

The Shafston Principal Executive Officer (PEO) has overall accountability for complaints governance, with the VET Manager responsible for operational complaints management and communicating their value to the organisation. Shafston ensures:

- Personnel at all levels understand and comply with complaints management policies and procedures,
- Personnel have received appropriate guidance, training and support to handle complaints,
- Students are directed to the complaints process and supported to lodge complaints when they experience a problem or have an issue, and
- Personnel performance is monitored to ensure complaints are handled properly and appropriate remedies are provided.

Making a complaint will not, of itself, disadvantage a student or result in withdrawal from training. Enrolment and training normally continue while a complaint is investigated, subject to lawful and properly documented student safety, conduct or training arrangements.

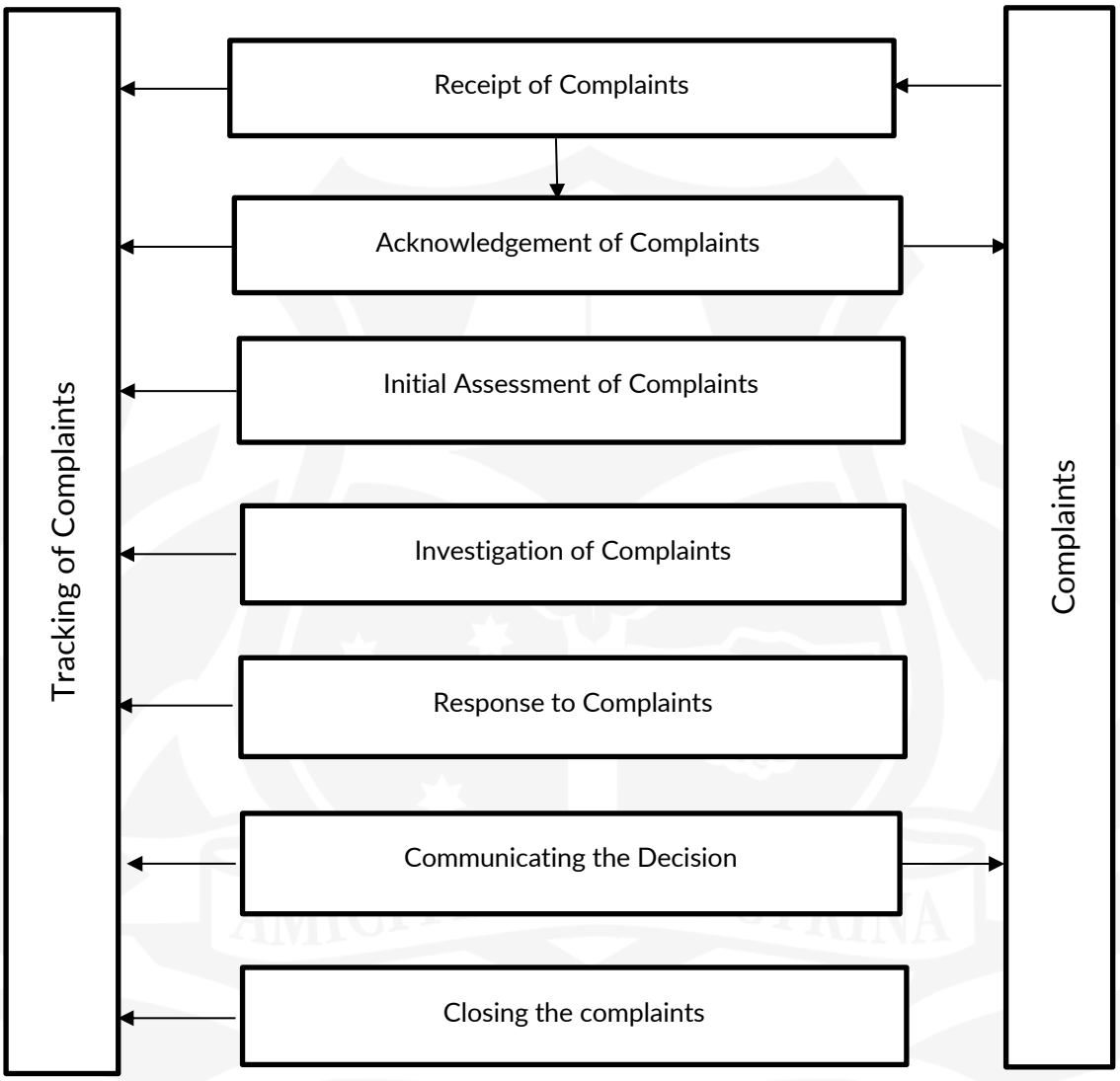
Responsibility, escalation and review

The Trainer or receiving staff member records and promptly refers formal complaints to the VET Manager. The VET Manager manages triage, impartial investigation, communications, register entries and corrective actions. Serious, systemic, safeguarding or unresolved matters are escalated to the PEO (Peter Wei). When the complaint concerns the VET Manager or PEO, the matter is referred to a suitably independent senior person or the governing body, rather than being investigated by the subject of the complaint.

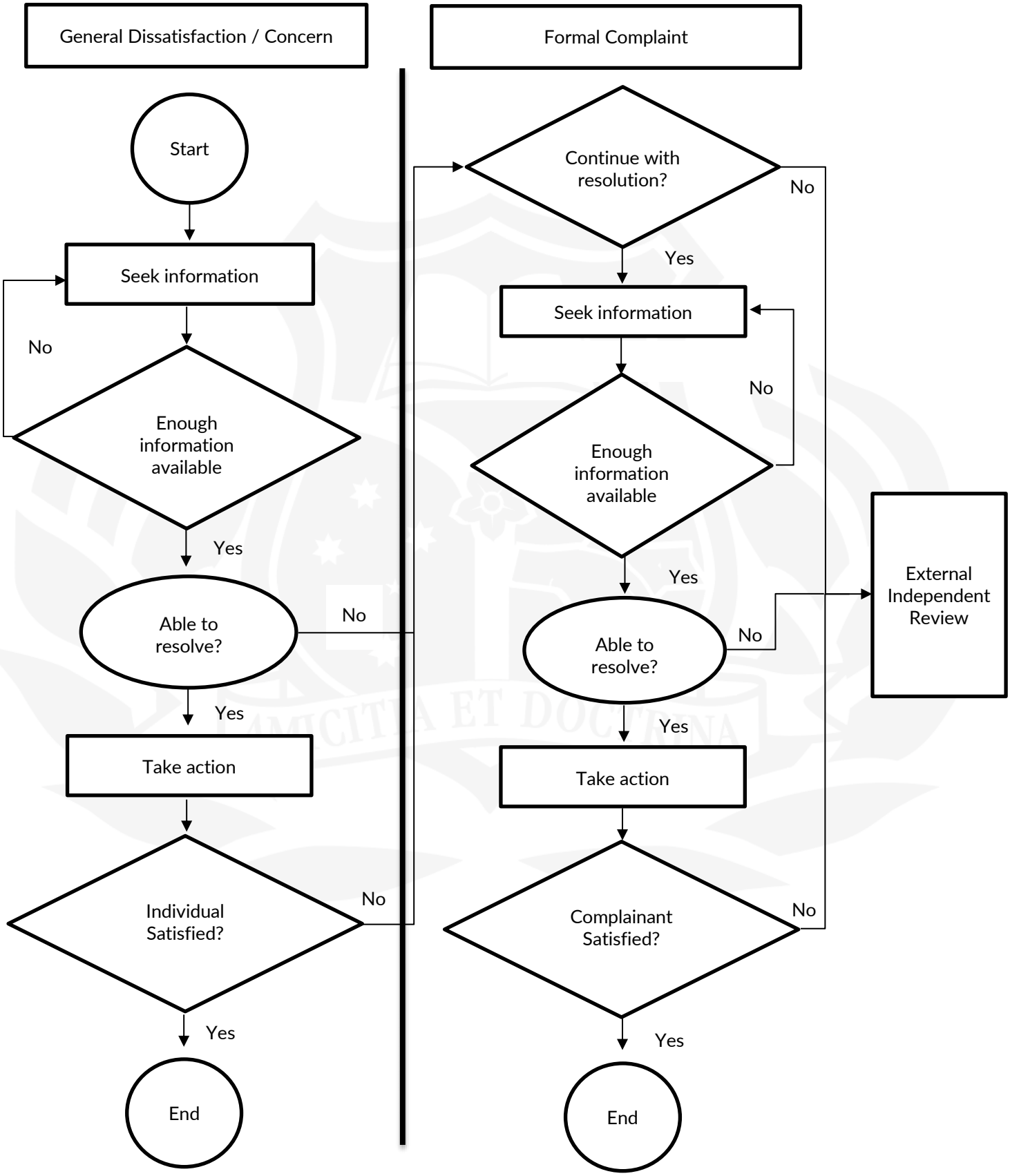
A dissatisfied complainant may seek internal reconsideration by the PEO or an uninvolved delegate and may make a complaint to a relevant external body, including ASQA where appropriate. ASQA is a regulator and does not act as Shafston's individual dispute resolution service. Where a formal adverse decision is being challenged, the matter is referred to the Appeals Policy without requiring the student to restart or repeat the complaint.

Complaint, Grievance and Dispute Resolution Procedure

Complaints Handling Flowchart



Escalation Flowchart



The following complaints handling framework has therefore been implemented for any stakeholder raising a complaint or issue. This procedure applies to all complaints, including those about:

- Academic matters from students,
- Non-academic matters from students, and
- Non-academic matters from persons seeking to enrol with the Shafston in a VET course or unit of study.

No fees are applicable or levied to the student or other complainant for any stage of the complaints process.

1. Where safe and appropriate, the complainant may discuss the matter with the person concerned. This is not required for bullying, harassment, violence or other safety concerns. The complainant may report directly to management or the independent contact where management is involved.

   If the complainant is satisfied with the outcome of the discussion, it would mean that the matter is resolved.

2. Any stakeholder may submit a formal complaint to Shafston. Complaints information captured includes:
   - Submission date of complaint,
   - Name of complainant,
   - Nature of complaint,
   - Date of the event / activity which lead to the complaint,
   - The products and services or related organisation practices complained about,
   - A description of the complaint and relevant supporting data,
   - Any other relevant information or attachments (if applicable),
   - The requested remedy,
   - Immediate action taken (if any), and
   - The due date for a response.

   All stages of the complaints process are documented. Complaints may be lodged via various channels including in-person via Shafston personnel, via telephone and via email.

   All complaints are immediately recorded in the Shafston **Complaints Register.**

3. Shafston commences processing of complaints as soon as practicable and within two (2) business days of a complaint being made and finalises the outcome as soon as practicable, preferably on the first contact if the complaint is straightforward. Complaints are assessed on a risk-based approach to assign them priority, considering items such as severity, safety implication, complexity, impact, and the need and possibility of immediate action. Personnel are alert in particular to the needs of students who are vulnerable or require special assistance.

   Simple complaints may be easily addressed by the personnel who has received the complaint. More complex complaints are allocated to the Shafston VET Manager in the first instance. Serious complaints are immediately reported to the Shafston Principal Executive Officer (PEO), who may allocate alternate or additional resourcing to the investigation and processing of the complaint.

4. Shafston acknowledges receipt of complaints in writing immediately, as soon as practicable, and:
   - Arranges a suitable time if needed to discuss the complaint,
   - Advises complainants of expected timeframes, and
   - Gives complainants the contact details of the allocated contact person they can speak to about their complaint.

5. The Shafston VET Manager investigates complaints or refers matters to appropriate Shafston personnel for investigation. In either case, investigations are expected to be resolved, and decisions made on the complaint as soon as practicable and within twenty (20) working days of the complaint being received in writing.

Complainants are given an opportunity to formally present their case at no cost and be accompanied and assisted by a support person at any relevant meetings.

An up-to-date status is made available to the complainant upon request and at regular intervals.

Decisions and outcomes of all complaints are merit-based decisions that consider all available evidence. Shafston ensures complaints are considered with an open mind and without bias arising from any past issues with the complainant.

Issues raised in complaints are analysed to determine cause(s) and the root cause evident.

6. Complainants are advised on the outcome of complaints in writing, including detailed reason(s) for the outcome, explanations for decisions and remedies where appropriate.

   The organisation ensures appropriate responses to complaints are provided promptly, addressing the needs and expectations of complainants while aligning with organisational policies and legal obligations.

   Responses are designed to resolve the complaint effectively and prevent recurrence where applicable.

   Types of Responses

   Depending on the nature and severity of the complaint, the organisation's responses may include, but are not limited to:

   - Issuing refunds where justified.
   - Providing replacements for faulty or unsatisfactory products/services.
   - Conducting repairs or rework to address service/product issues.
   - Offering substitute products or services.
   - Delivering technical assistance to resolve specific concerns.
   - Sharing information to clarify the issue and its resolution.
   - Making referrals to relevant personnel, departments, or external parties.
   - Providing financial assistance where appropriate.
   - Offering other assistance as deemed necessary.
   - Awarding compensation for damages or inconvenience caused.
   - Issuing an apology to acknowledge the organisation's responsibility.
   - Offering a goodwill gift or token as a gesture of sincerity.
   - Implementing changes to products, services, processes, policies, or procedures based on the complaint.

   Implementation Considerations

   The organisation will take into account the following when deciding on and implementing responses:

   - Addressing all aspects of the complaint comprehensively to ensure resolution.
   - Conducting follow-ups where appropriate to confirm complainant satisfaction and resolution effectiveness.
   - Determining if it is suitable to extend remedies to others who might have been similarly affected but did not file formal complaints.
   - Ensuring the level of authority required for approving various types of responses.
   - Ensuring the dissemination of information about the response to relevant personnel for proper action and future prevention.

Response Authorisations		
Response Type	Approval Level Required	Notes
Refunds	Supervisor or Manager	All refunds require approval under the current Shafston financial delegations before confirmation.
Substitutes	Supervisor	Substitutes must be of equal or greater value than the original product/service.
Technical Assistance	All personnel	No additional approval required for standard technical assistance requests.
Information Requests	All personnel	Information shared must comply with privacy and confidentiality policies.
Referral to External Parties	All personnel	Ensure referral agreements are in place before providing details to external parties.
Other Assistance	Supervisor or Manager	Assistance must align with organisational policy and available resources.
Apology	All personnel	Standard apologies can be issued; escalations require Supervisor approval.
Policy/Process Changes	Principal Executive Officer (PEO)	Significant changes require consultation and formal approval by the governing body.

All approvals must be recorded in the **Complaints Register**, including the name and role of the approver.

If an approver is unavailable, the request should be escalated to the next level of authority.

This procedure ensures all responses are effectively authorised, documented, communicated effectively to the complainant, and aligned with the overall complaints-handling framework.

With this notification, all complainants receive information on how they can progress their compliant if still unhappy.

If a complainant is not satisfied with the outcome, they may appeal the decision.

Please refer to the **Appeals Policy** for further information.

Shafston securely maintain records of all details of the complaints process and retains evidence of all documentation relevant. Each complaint and its outcome is recorded via the **Complaints Register**. This register is located at: Staff Portal - Sharepoint

Complaints Processing Delays

If at any stage Shafston considers more than twenty (20) working days are required to process and finalise a complaint, Shafston:

- Informs the complainant in writing, including reasons why more time is required, and
- Regularly updates the complainant on the progress of the matter.

Shafston retains records of all complaints and grievances for a period of at least ten (10) years, allowing parties to the complaint or grievance appropriate access to these records.

Privacy, records and review

All records are securely maintained in Shafston's staff SharePoint portal, with access restricted to authorised personnel and managed in accordance with the Privacy Policy, Records Management requirements and applicable retention obligations. Investigation notes, evidence, decisions, outcome letters, notices to schools/parents where lawful, corrective actions and closure dates must be retained. Only factual and necessary information is shared with external parties.

This domestic-student policy excludes CRICOS and Overseas Students Ombudsman processes. The student-facing summary and current complaint lodgement contact must be published on the domestic website and in the domestic Student Handbook.

Complaints Key Contacts

If a complainant is not satisfied with the resolution of a complaint, they may seek further assistance from the following additional parties as relevant:

Organisation	Details
Australia Skills & Quality Authority (ASQA)	1300 701 801 www.asqa.gov.au
Skills ACT	www.act.gov.au/skills/home
NSW Department of Education & Training	https://www.nsw.gov.au/education-and-training/vocational
NT Department of Education and Training	https://education.nt.gov.au
QLD Department of Trade, Employment and Training	https://dtet.qld.gov.au/
Skills South Australia	https://mytraining.skills.sa.gov.au
Skills Tasmania	www.skills.tas.gov.au
Victorian Department of Education & Training	www.skills.vic.gov.au
WA Department of Training and Workforce Development	https://www.wa.gov.au/organisation/department-of-training-and-workforce-development

Improvement Actions

Shafston is committed to take appropriate action in any case where a complaint is substantiated. In cases where a complaint is upheld, Shafston endeavours to identify the root cause of the complaint and takes appropriate action to prevent the situation happening again.

All improvement actions arising from complaints are raised via an **Improvement Record.** Shafston maintains a **Continuous Improvement Register** for recording the receipt and management of improvement records.

Shafston:

- Regularly analyses complaints to identify trends and any further improvements needed,
- Audits the complaints process on an annual basis to assess its effectiveness and improve the complaints process as needed.

Please refer to the **Quality Policy** for further information on the continuous improvement process.

Monitoring and Evaluation

Shafston monitors and evaluates the complaints handling process to ensure complaints are handled objectively.

A process of performance monitoring, evaluation, and reporting has been established and implemented.

The organisation continually improves the effectiveness and efficiency of processes. Process performance and outcomes are regularly audited to identify and remove causes of existing and potential problems, as well as to uncover any opportunities for improvement.

Please refer to the **Quality Policy** for further information on the monitoring and evaluation process.