# Student Complaints and Appeals Policy

**Version Number:** 3.8
**Effective Date:** 22 May 2026
**Review Date:** 16 February 2027
**Approved By:** VET Council and Academic Board
**Policy Owner:** Quality and Compliance Manager
**Policy Area:** VET/HE
**Audience:** Public

## 1. Purpose

1.1 This policy provides a framework for resolving complaints and appeals in a fair, transparent and equitable manner at Stanley College, and seeks to ensure that:

- 1.1.1 complaints and appeals are dealt with consistently, fairly and without reprisal;
- 1.1.2 the rights of all parties are protected;
- 1.1.3 complaints and appeals are resolved as promptly and efficiently as possible;
- 1.1.4 management of complaints and appeals follows standard procedures;
- 1.1.5 the internal and external complaints and appeals procedures are in accordance with legislated requirements and best practice.

## 2. Scope

2.1 This policy applies to:

- 2.1.1 all staff;
- 2.1.2 current, prospective and previously enrolled Vocational Education and Training (VET), ELICOS and Higher Education (HE) students.

## 3. Key Definitions

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| **Academic Board** | As the peak body of Higher Education academic governance at Stanley College, the Academic Board provides independent oversight of all academic matters for Higher Education activities of the College. It informs the College's executive and management staff in their attendance to these matters and provides advice on how the College can direct resources to support the student experience. |
| **Appeal** | A request for a decision to be reviewed by an independent area. Appeals can be lodged about academic and non-academic decisions made, including:<br>• student misconduct<br>• refused transfer requests<br>• course progress<br>• student enrolment cancellation. |
| **Appellant** | The person who lodges an appeal. |
| **Australian Consumer Law** | A national law guaranteeing consumer rights when buying goods and services to ensure consumers (including students) are not given false or misleading information. Education Services provided by Stanley College is covered by Australian Consumer Law. |

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| **Complainant** | The person who lodges a complaint or a grievance. |
| **Complaint** | A complaint can be informal (feedback) or formal (in writing), which require a process of review by Stanley College and a response to the Complainant within a required timeframe. |
| **Delegated Officers** | Complaints and Appeals will be investigated by an appropriate Delegated Officer(s) who is independent of the complaint or appeal under investigation. This officer is also responsible for making the final decision on the student case outcome. Delegated officers are dictated by the nature and location of the complaint/appeal within the organisation (i.e. Faculty or department). |
| **Domestic Student** | A student who is an Australian citizen, a New Zealand citizen, the holder of an Australian Permanent Resident visa or the holder of an Australian humanitarian visa.<br>A domestic student can include temporary visa holders, who do not hold a Student Visa issued by DoHA, including 485, 457, student dependents, working holiday and visitor visa holders. |
| **eCAFO** | Electronic Complaints and Appeals Form (eCAFO), accessible via the Stanley College website for the submission of all Complaints and Appeals. |
| **Education Agent** | A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers.<br>Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities). |
| **ELICOS** | English Language Intensive Courses for Overseas Students. |
| **Executive Management Team** | The Executive Management Team (EMT) comprises senior leaders responsible for strategic direction, operational oversight, and academic leadership across Stanley College. Membership may include roles such as the President, Vice Presidents, Deans, and other key departmental heads.<br><br>The full list of EMT members is detailed in the Stanley College Glossary of Terms. |
| **Formstack** | Formstack is a secure, cloud-based software platform that helps businesses streamline data collection, automate workflows, and generate documents. |
| **Funded Course** | A course that has been allocated funds by the State Government for Domestic Students to access. |
| **Funded Students** | Students who are studying a Funded Course. |
| **Grievance** | A problem or concern raised by a student about something affecting his or her studies or life as a student, for which the student is seeking resolution. The term complaint is often used interchangeably with grievance. |
| **HE** | Higher Education. |
| **Independent Reviewer** | A person who is not involved in the original investigation, assessment, or decision-making process of a complaint or appeal. The Independent Reviewer is responsible for independently |

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| | reviewing the outcome to ensure procedural fairness, adherence to Stanley College policies and procedures, and impartiality, before the decision is communicated to the student. |
| **International Student** | A student studying in Australia on a student visa issued by DoHA. |
| **Natural Justice Principles** | The principles and procedures that decision makers and investigators must follow in order to make a decision that is fair and morally correct. These are broadly summarised as:<br>• All parties to the matter(s) in dispute, including respondent(s) shall have a right to be heard before a decision is made, including the right to respond to any statements or evidence that may prejudice their case.<br>• All relevant submissions, information and evidence to be considered by the decision-maker should be disclosed, where requested, to all parties to the complaint prior to a hearing. Matters that are not relevant shall not be considered by the decision-maker.<br>• The decision maker(s) shall not be biased or appear to be biased (by a reasonable and informed bystander) nor have any vested interest or personal involvement in the matter being considered.<br>In addition to these principles, there should be no undue delay in responding to complaints or appeals and all parties to such matters shall have the right to a representative of their choice, other than a currently practicing solicitor or barrister (except in extraordinary circumstances at a hearing with the prior leave of the Chair). |
| **Respondent(s)** | One or more persons or an organisation against whom a complaint or appeal is made. |
| **Representative** | Another member of staff, a union representative, or another person providing support (family member, friend, advocate, counsellor or other professional support person) and where the representative is not a currently practicing solicitor or barrister. |
| **VET** | Vocational Education and Training |
| **VET Council (VETC)** | The VET Council (VETC) has the responsibility of overseeing and ensuring the excellence, financial viability, and effectiveness of Stanley College's Vocational Education and Training (VET) courses. |

## 4. Policy Principles

### Principles

4.1 Where this policy and the associated *Student Complaints and Appeals Procedure* refer to both Complaints and Grievances at the same time, they will be referred to as 'Complaints'.

4.2 Stanley College provides a complaints and/or appeals process that is transparent, fair and equitable. Subject to the complaint and/or appeal being heard and investigated within Stanley College in the first instance, further complaints or appeals may be referred to an independent external body if requested by the complainant/appellant at no or low cost to the student. Stanley College's complaints and appeals processes are:

4.2.1 available to all students;
4.2.2 confidential;
4.2.3 free of cost.

4.3 The process set out in the accompanying *Student Complaints and Appeals Procedure* do not replace or modify procedures or any other responsibilities which may arise under Stanley College's policies or under statute or any other law. Nothing in these procedures limits the rights of individuals to take action under any applicable Australian law such as the Australian Consumer Law. Also, these procedures do not circumscribe an individual's rights to pursue other legal remedies.

4.4 Stanley College will respond to any complaint or appeal a student makes regarding their dealings with the College. This includes any decisions made by Stanley College, third parties (including Education Agents) that deliver a course or related services, and any person employed or contracted by Stanley College, where those decisions adversely affect the student.

4.5 The College provides complaints and appeals handling processes that adhere to the following principles. The College will:

4.5.1 respond to complaints and appeals submitted via the eCAFO (electronic Complaints and Appeals Form);
4.5.2 commence the assessment of the complaint or appeal within 5 working days of lodgement of the eCAFO via the Stanley College website and finalise the outcome as soon as possible, however as a standard of practice, cases will be resolved within 20 working days of lodgement;
4.5.3 where more than 20 working days are required to finalise the complaint or appeal, the complainant/appellant will receive formal extension notification detailing the reason why additional time is required beyond the 20 working days' time period;
4.5.4 aim to develop a culture where complaints and appeals are viewed as an opportunity for improvement at the College;
4.5.5 provide an environment in which students may make complaints without fear of reprisal or discrimination at any time;
4.5.6 ensure that staff are aware of complaints and appeals processes and are trained appropriately to ensure that processes are consistently applied;
4.5.7 require respectful behaviour amongst all parties when handling complaints and appeals;
4.5.8 communicate effectively in a timely manner to keep all parties up to date with the progress of the complaint or appeal, supported by the Formstack system, which enables transparent tracking throughout the process;
4.5.9 take measures to hold information in the utmost confidence and respect for privacy;
4.5.10 apply the principles of procedural fairness – that is, ensure that a fair and proper procedure is followed at each stage of decision-making, with all actions recorded and auditable through Formstack;
4.5.11 apply the principles of natural justice – that is, to give all parties the chance to present their case and have an opportunity to reply;
4.5.12 aim to resolve complaints and appeals to the satisfaction of all parties; and
4.5.13 ensure complaints and appeals are investigated by an appropriate Delegated Officer(s) and then independently reviewed by an appropriate Independent Reviewer(s) prior to finalisation. Further details concerning this can be found at the end of this policy in the '*Guideline 1 – Delegated Officers and Independent Reviewers*'.

4.6 Stanley College will advise students of their right to access an external complaint and appeals handling process by an independent party. Students are reminded that they can contact these parties within 10 working days from the receipt of the outcome of the internal review process. However, it does not restrict them from contacting these parties after 10 working days. Stanley College will maintain a register of all complaints and appeals, and it will ensure that the outcomes of complaints and appeals are used to inform continuous improvement.

### Third-party representative

4.7 Students have the right to be represented by a third-party representative such as a family member, friend, advocate, counsellor or other professional support person, other than a legal representative.

4.8 A third-party representative may act as a support person or advocate for the student during the complaints or appeals process.

4.9 This is applicable for all types of complaints and appeal, and at all stages during the process.

### Grounds for a complaint or appeal

4.10 Complaints or appeals may be lodged against decisions made under Stanley College policies or procedures.

4.11 Complaints may be lodged due to, but not limited to, the following:

- 4.11.1 academic matters, including teaching quality, intellectual property, plagiarism and cheating;
- 4.11.2 administrative matters regarding policies, procedures, decisions and access to required resources;
- 4.11.3 a Stanley College third-party provider's actions;
- 4.11.4 staff members' or another student's behaviour or actions (including intimidation or bullying);
- 4.11.5 discrimination; harassment or related matters protected by law; false or misleading information or advice in relation to marketing by the College or one of its authorised Education Agents;
- 4.11.6 stealing or damage to property;
- 4.11.7 IT and resources available (including internet and hardware);
- 4.11.8 facilities and resources;
- 4.11.9 class scheduling;
- 4.11.10 collective complaints by a number of students with a similar issue;
- 4.11.11 breach of privacy;
- 4.11.12 finance-related matters including fee payments, refunds;
- 4.11.13 conduct or decisions that have an unreasonable negative impact on the student.

4.12 Complaints and Appeals may be lodged by a student due to a decision made by Stanley College including, but not limited to, the following:

- 4.12.1 an assessment/ exam outcome or result;
- 4.12.2 a complaint/appeal outcome;
- 4.12.3 admission or enrolment;
- 4.12.4 unsatisfactory course progress;
- 4.12.5 unsatisfactory course attendance (ELICOS only);
- 4.12.6 transfers or withdrawal;
- 4.12.7 credit;

4.12.8 exclusion;
4.12.9 student discipline matters (including misconduct, cheating, unfair advantage and plagiarism);
4.12.10 special consideration;
4.12.11 fees and charges;
4.12.12 refunds.

## Possible Outcomes

4.13 Possible outcomes of a Complaint or Appeal may include at least one of the following:
4.13.1 dismissal of the case;
4.13.2 written undertaking or apology;
4.13.3 written agreement on future behaviours or actions;
4.13.4 disciplinary action, including possible expulsion from the College where a student is found to have acted in a way that is a serious breach of the *Stanley College Code of Conduct* (available in the applicable Student Handbook)*;*
4.13.5 remedial action (e.g. correction of records, revised policies or procedures) or new internal policies, procedures or guidelines;
4.13.6 conciliation and/or mediation under the guidance of a mutually accepted third party representative (internal or external).

4.14 Unless there are valid reasons for Stanley College to believe that there is a risk to other students or staff of the College, the student will remain enrolled, pending the outcome of any appeal process.

4.15 Complainants, appellants or respondents (where there is a respondent) who require support through a complaint or appeal process are referred to appropriate support services and/or protection when required.

4.16 Complainants, appellants or respondents are encouraged to contact Stanley College for further information, support or to provide feedback.

## External Avenues for Complaints and Appeals

4.17 All students have the right to lodge an external complaint or appeal within 10 working days from the date Stanley College issues written notification of the final outcome arising from the internal complaint or appeal. External avenues of action for complaints or review for an appeal, are only available to students who have submitted an internal complaint or appeal with Stanley College in the first instance.

4.18 Grounds for an external complaint or appeal include:
4.18.1 there was a lack of natural justice – that is, there was insufficient opportunity to present their case;
4.18.2 there was evidence of bias or discrimination in the decision;
4.18.3 the process was not carried out in line with Stanley College Policy;
4.18.4 the decision was contrary to the evidence provided;
4.18.5 the penalty was excessive under the circumstances.

4.19 External avenues

| Student Group | External Appeal Body | How to Appeal |
|---|---|---|
| Domestic Student (VET Fee for Service) | The National Training Complaints Hotline | Website- https://www.dewr.gov.au/national-training-complaints-hotline phone -13 38 73 |
| Domestic Students – VET Student Loans | The VET Student Loans Ombudsman | Website- https://www.ombudsman.gov.au/complaints/vet-student-loan-complaints Phone - 1300 362 072 In Person – Commonwealth Ombudsman* |
| International Students (VET) | Overseas Students Ombudsman | Website-www.ombudsman.gov.au Phone - 1300 362 072 In Person – Commonwealth Ombudsman* |
| International and Domestic Students (Higher Education) | National Student Ombudsman services | Website – www.nso.gov.au Phone - 1300 395 775 (Monday to Friday 10am to 4pm (AEDT) except Wednesdays where we close at 2pm In Person – Commonwealth Ombudsman* |

* Students can visit the Commonwealth Ombudsman office locations listed below between 10am and 4pm Monday to Friday:

- Adelaide - Level 11, 25 Grenfell Street
- Canberra - Level 5, 7 London Circuit
- Brisbane - Level 22, 215 Adelaide Street
- Sydney - Level 20, 60 Castlereagh Street
- Melbourne – Level 2, 452 Flinders Street

Note – There is currently no Commonwealth Ombudsman office in Perth (Western Australia)

### Record Keeping

Records of all complaints and appeals will be kept and accessible for all interested parties for a period of five years. All evidence of completion will be securely stored on Stanley College servers (no references to a complaint/appeal should be stored on the Student Management System, eBECAS).

## 5. Roles and Responsibilities

5.1 **Quality & Compliance Manager:** responsible to oversee the overall student complaints and appeals process including record keeping and managing external avenues for complaints and appeals when required.

5.2 **Compliance Team:** responsible for monitoring processes through the Formstack system and day to day management of the complaints and appeals process, including ensuring compliance and meeting standard timelines.

5.3 **Delegated Officers:** as detailed in *Guideline 1 – Delegated Officers and Independent Reviewers* included in this policy, are responsible for the investigation of each complaint/appeal applicable to their designated business area with full compliance to the policies, processes and regulatory frameworks applicable.

5.4 **Independent Reviewers:** as detailed in *Guideline 1 – Delegated Officers and Independent Reviewers* included in this policy, are responsible for independently reviewing and finalising the outcome of each complaint/appeal applicable to their designated area.

5.5 **Faculty Managers/Academic Program Managers/Operational Heads of Department:** are responsible for monitoring and closing continuous improvement actions required because of complaints and appeals.

## 6. Reference Documents

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| **Supporting documents, procedures, work guidelines and forms** | Student Complaints and Appeals Procedure<br>Quality and Continuous Improvement Policy (VET & ELICOS)<br>Quality and Continuous Improvement Procedure (VET & ELICOS)<br>Continuous Improvement Registers<br>electronic Complaints and Appeals Form (eCAFO)<br>Complaints and Appeals Register<br>Student Record Management Policy (VET)<br>Student Handbook (International Students / Local Students / International Students / ELICOS Students)<br>How to Guide - Formstack Complaints and Appeals Process |

## 7. Version History

| Version | Date | Changes Summary |
|---|---|---|
| Old 4.0 | 19 March 2025 | Higher Education (HE) policy and procedure on Student Complaint and Appeals<br>Date first approved: 28 May 2018<br>Historical dates of amendments<br>28 September 2021<br>2 September 2024<br>19 March 2025<br>Approved to combine the VET and HE policies to a single policy: July 2025 |
| 3.0 | | HE Version 4.0 and VET version 2.2 is updated as the latest version 3.0 in Novarore and published as a single policy document |
| 3.1 | 11 February 2026 | Addition of new content - section 4.2<br>Update to existing content - definition of representative and NSO details |
| 3.2 | 16 February 2026 | Removal of existing content - definition of third-party |
| 3.3 | 16 February 2026 | Update to existing content - section 8.2 |
| 3.4 | 10 March 2026 | Update to existing content - Guideline 1 – Delegated Officers and Independent Reviewers |
| 3.5 | 08 April 2026 | Update to existing content - – Delegated Officers and Independent Reviewers |
| 3.6 | 01 May 2026 | Update to existing content - Update to the policy/procedure template |
| 3.8 | 22 May 2026 | Update to existing content - reporting to AB is quarterly |

## 8. Compliance Monitoring Summary

| Overview | Frequency |
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| Circulation of monthly Continuous Improvement formstack report to all academic and operational departments, detailing identified continuous improvement actions **and** confirming which occurrences have been added to continuous improvement registers | Monthly, first Monday |
| Review of year-on-year complaints and appeals live data **and** preparation of quarterly reporting to be submitted to the VET Council (VETC) and Academic Board (AB) for a periodic review and decision making. | Quarterly submission to VET Council<br>Quarterly submission to Academic Board |

## 9. Link to Standards

### Standards for RTOs 2025

| Quality Area | Outcome Standard | Focus Area | Standard | Performance Indicator |
|---|---|---|---|---|
| VET Student Support | VET students are treated fairly and are properly informed, supported and protected. | Feedback, complaints and appeals | Standard 2.7 | (a) – i, ii, iii, iv<br>(b)<br>(c)<br>(d)<br>(e) |
| VET Student Support | VET students are treated fairly and are properly informed, supported and protected. | Feedback, complaints and appeals | Standard 2.8 | (a) – i, ii, iii, iv<br>(b)<br>(c)<br>(d) |

### Higher Education Standards Framework (Threshold Standards) 2021

| Domain | Section | Standards |
|---|---|---|
| 2. Learning Environment | 2.4 Student Grievances and Complaints | 1, 2, 3, 4 |
| 5. Institutional Quality Assurance | 5.3 Monitoring, Review and Improvement | 5 |
| 6. Governance and Accountability | 6.1 Corporate Governance | 4 |
| 6. Governance and Accountability | 6.2 Corporate Monitoring and Accountability | 1 (j) |
| 7. Representation, Information and Information Management | 7.2 Information for Prospective and Current Students | 1, 2 (f, g) |
| 7. Representation, Information and Information Management | 7.3 Information Management | 3(c) |

### National Code of Practice 2018

| Standard (Number) | Standard (Descriptor) | Standards (Individual) |
|---|---|---|
| Standard 10 | Complaints and Appeals | 10.1, 10.2, 10.3, 10.4 |

Guideline 1 – Delegated Officers and Independent Reviewers

The table provides a guide to identify the appropriate Delegated Officer responsible for investigating a case, and the Independent Reviewer responsible for independently reviewing and finalising the eCAFO outcome, which will be sent to the student via Formstack.

| Category of Complaint/Appeals | Area of Complaint or Appeal | Delegated Officer for Investigation | Independent Reviewer for Reviewing and Finalising Outcome |
|---|---|---|---|
| Faculty/Program Area (Academic/Assessment) | Attendance, Assessment Outcome/Results (Unit), Delivery, Assessment Resources, Marking or Results, Work-Based Training, Internship, Award Issuance, Work-Integrated Learning, Clinical Work Placement, Lecturer/Trainer/Staff | • Relevant Faculty Manager; or<br>• Relevant Academic Program Manager | • VET - Dean VET<br>• HE - Registrar |
| Faculty/Program area | Complaint concerning Senior Investigating Officers or Leaders | • Dean (VET); or<br>• Dean (HE); or<br>• Vice President Wellbeing & Engagement | • Vice President Wellbeing & Engagement; or<br>• Applicable member of Executive Leadership Team (ELT) |
| Finance | Cancellation Fees, Tuition Fees, Non-payment of Fees (Notice), Non-payment of Fees (Cancellation Advice Letter) | • Head of Finance & Accounts<br>*(cc email for decision sent to Chief Financial Officer and Financial Controller)* | • Vice President Wellbeing & Engagement |
| IT | LMS, IT Support, WIFI, Equipment | • ICT Manager | • Vice President Wellbeing & Engagement |
| Maintenance/Campus/ Facilities | Campus Facilities, Campus Condition, Equipment, Cleanliness | • Operations Manager | • Vice President Wellbeing & Engagement |
| Admissions/Student Services | Admissions Experience, Award Issuance, Student Services Staff, Code of Conduct (Notice), Orientation, Enrolment Conditions (Notice), Student Services Experience, Class Schedule, Attendance (Notice), Course Progress (Notice), Other Students | • Student Support Officer<br>*(cc email for decision sent to Vice President Wellbeing & Engagement)* | • Manager, Student Services Team |
| Other Business areas | Complaint concerning Leader from another business area (i.e. Student Services, Finance, Admissions, WHS, ICT) | • Vice President Wellbeing & Engagement | • Vice President Wellbeing & Engagement; or<br>• Applicable member of Executive Leadership Team (ELT) |
| Note : When managing complaints and appeals related to course progress, it is recommended to coordinate with Faculty Managers or Academic Program Managers where appropriate | | | |