

# Complaints Handling Policy and Procedure

## 1. Purpose

The purpose of this Policy and Procedure is to establish a fair, transparent, and accessible framework for the management of feedback, complaints, and appeals at Princeton International College.

Princeton International College is committed to ensuring that all students, staff, and stakeholders are provided with clear and accessible information on how to raise concerns, and that all complaints and appeals are managed in a timely, consistent, and procedurally fair manner.

This Policy and Procedure is developed and implemented in accordance with the requirements of:

- Standards for Registered Training Organisations (RTOs) 2025 (Outcome Standards)
- Education Services for Overseas Students (ESOS) Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Standard 10 – Complaints and Appeals)
- ELICOS Standards 2018, where applicable to English language delivery

This policy ensures that:

- Information on how to provide feedback and make complaints is publicly available and easily accessible
- Complainants are appropriately supported throughout the complaints and appeals process
- All parties are afforded procedural fairness and principles of natural justice
- Complaints and appeals are managed within defined and reasonable timeframes
- Outcomes are documented, evidence-based, and clearly communicated to all relevant parties
- Feedback and complaints are systematically reviewed and used to inform continuous improvement across the College

## 2. Scope

This Policy and Procedure applies to all complaints and appeals received by Princeton International College in relation to its operations, services, and delivery of education and training.

This includes, but is not limited to, matters relating to:

- Training and assessment services
- Student support and welfare services
- Administrative processes and enrolment management

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- Staff conduct and professional behaviour
- Facilities, resources, and learning environment

This policy applies to all stakeholders of the College, including:

- Domestic students and international students enrolled under CRICOS
- Staff, trainers, and assessors
- Education agents, employers, and third parties interacting with the College

This Policy and Procedure applies to both complaints and appeals, including appeals against assessment decisions, administrative decisions, and outcomes arising from College processes.

The CEO may delegate operational aspects of complaint handling; however, retains ultimate responsibility for all decisions and outcomes.

This policy must be read in conjunction with the College's broader governance, compliance, and operational framework, including but not limited to:

- Student Handbook
- Complaints and Appeals Forms and Registers
- Training and Assessment Policy and Procedure
- Student Support and Wellbeing Policy and Procedure
- Student Recruitment Policy and Procedure
- Continuous Improvement and Quality Assurance Policy and Procedure
- Records Management Policy and Procedure

### 3. Definitions

For the purpose of this Policy and Procedure, the following definitions apply:

- **Complainant**  
Any individual or organisation making a complaint. This may include students (domestic or international), staff, trainers, assessors, employers, education agents, or other third parties interacting with Princeton International College.
- **Complaint**  
An expression of dissatisfaction with the services, staff, processes, or operations of Princeton International College that requires formal acknowledgement, investigation, and resolution.
- **Appeal**  
A request for a review or reconsideration of a decision made by the College. This may include, but is not limited to, assessment outcomes, administrative decisions, or outcomes of a complaint.

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- **Procedural Fairness (Natural Justice)**

The process by which decisions are made in a fair, unbiased, and transparent manner. This includes ensuring that all parties are given the opportunity to present their case, respond to allegations, and have decisions made based on relevant evidence.

- **Internal Complaints and Appeals Process**

The formal process undertaken by Princeton International College to manage and resolve complaints and appeals prior to escalation to an external body.

- **External Complaints and Appeals Process**

An independent process available to the complainant if they are not satisfied with the outcome of the College's internal process, which may involve an external agency or third-party mediator.

### 4. Policy Statement

Princeton International College is committed to maintaining an open, transparent, and responsive environment in which feedback, complaints, and appeals are actively encouraged and recognised as valuable opportunities for continuous improvement.

The College ensures that all complaints and appeals are managed in a fair, consistent, and unbiased manner, in accordance with principles of procedural fairness and natural justice. All parties involved in a complaint or appeal are treated with respect, and are provided with the opportunity to present their case and respond to any relevant information before a decision is made.

This process is accessible and provided at no cost to the student. This written agreement, and the right to make complaints and seek appeals of decisions and action under various processes, does not affect the rights of the student to take action under the *Australian Consumer Law* if the *Australian Consumer Law* applies

A clear and accessible complaints and appeals process is available to all stakeholders through multiple channels, including written, verbal, and electronic communication. The College ensures that complainants are not subject to disadvantage, victimisation, or discrimination as a result of raising a concern.

Confidentiality and privacy are maintained throughout the complaints and appeals process, with information disclosed only to authorised personnel involved in the resolution of the matter.

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All decisions are based on relevant evidence and are appropriately documented to ensure transparency, consistency, and audit traceability. Outcomes are communicated in writing to all relevant parties, including the reasons for the decision.

The College promotes early and informal resolution of concerns wherever appropriate, while ensuring that formal processes are available and applied where required. All complaints and appeals are managed within defined and reasonable timeframes in accordance with regulatory expectations.

The Chief Executive Officer (CEO) acts as the primary point of contact for student support where required and maintains overall responsibility for the management and resolution of complaints and appeals. The CEO ensures that all complaints are handled in accordance with regulatory requirements and organisational procedures.

### 5. Principles of Complaint Handling

Princeton International College applies the following principles to ensure that all complaints are managed in a fair, consistent, and transparent manner, aligned with regulatory requirements and best practice.

#### 5.1 Procedural Fairness and Natural Justice

All complaints are managed in accordance with the principles of natural justice and procedural fairness. This ensures that decisions are made objectively, without bias, and based on relevant and verifiable information.

The College ensures that each complaint is handled by an impartial person, and that all parties involved are given a reasonable opportunity to present their case and respond to any information or allegations. Decisions are made based on evidence and are communicated to the relevant parties in writing, including the reasons for the outcome, prior to implementation.

#### 5.2 Accessibility and Support

Princeton International College ensures that the complaints process is accessible, inclusive, and supportive for all stakeholders.

Complaints may be submitted in a range of formats, including written, verbal, or electronic communication, to accommodate different needs and circumstances. Students and other complainants are supported throughout the process and are provided with clear guidance on how to raise and progress a complaint.

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Complainants have the right to be accompanied by a support person at any stage of the process. Where required, additional support is provided to ensure that vulnerable individuals, including younger students, are able to participate fully and effectively in the complaints process.

### 5.3 Early Resolution

The College promotes the early and informal resolution of concerns wherever appropriate. Issues that arise during training, assessment, or service delivery are encouraged to be addressed promptly through direct communication between the parties involved.

Where a matter cannot be resolved informally, or where the issue is of a more serious nature, it will be escalated and managed through the formal complaints process in accordance with this Policy and Procedure.

## 6. Complaint Handling Timeframes

Princeton International College is committed to managing complaints and appeals in a timely, efficient, and transparent manner, ensuring that all matters are addressed without unnecessary delay and in accordance with regulatory expectations.

Upon receipt of a complaint, the College ensures that:

- A written acknowledgement is provided to the complainant within 24 hours, confirming receipt of the complaint and outlining the next steps in the process
- An initial assessment and categorisation of the complaint, including consideration of severity, urgency, and nature, is conducted within 5 working days
- The complaint handling process, including any required investigation or consultation, commences within 5 working days of receipt
- A final outcome is provided in writing within 10 working days.

Where a complaint is complex or requires additional time for investigation, Princeton International College will inform the complainant in writing. This communication will include the reasons for the delay and an updated timeframe for resolution.

Throughout the process, the complainant is kept informed of the progress of their complaint at regular intervals, ensuring transparency and ongoing engagement.

## 7. CRICOS and ESOS Requirements

For international students enrolled under CRICOS, Princeton International College ensures that all complaints and appeals processes are managed in accordance with the Education Services for Overseas Students (ESOS) Act 2000 and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Standard 10 – Complaints and Appeals).

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The College ensures that international students are informed of their right to access both internal and external complaints and appeals processes. Information regarding these processes, including relevant contact details for external bodies, is provided through the Student Handbook, College website, and formal communication during the complaints process.

Where a complaint or appeal relates to a decision that may affect the student's enrolment, including decisions relating to course progress or attendance, the College will maintain the student's enrolment while the internal complaints and appeals process is ongoing, in accordance with National Code requirements.

If the student is not satisfied with the outcome of the internal process, Princeton International College will advise the student in writing of their right to access an independent external complaints and appeals process within 10 working days of the conclusion of the internal review. The College will provide the student with the contact details of the appropriate external body, including its arrangements with Resolution Institute for independent mediation and review. Where the appeal relates to the College's intention to report the student to the Department of Home Affairs, the student's enrolment will be maintained until the external appeals process is completed and has supported or not supported the College's decision.

If the outcome of any internal or external complaints or appeals process results in a decision in favour of the student, Princeton International College will immediately implement the decision or recommendation and will advise the student in writing of the action taken.

All complaints and appeals involving international students are documented, monitored, and managed in a manner that ensures compliance with ESOS obligations and supports the protection of student rights.

### 8. External Complaints and Appeals

Where a complaint or appeal is not resolved through the College's internal complaints and appeals process, the complainant has the right to access an independent external review.

Princeton International College has a **formal agreement with Resolution Institute**, an independent and nationally recognised dispute resolution body, to provide external complaints handling and mediation services. This arrangement ensures that complainants, including overseas students enrolled under CRICOS, have access to an impartial, transparent, and structured external review process.

Where a complainant is not satisfied with the outcome of the internal process, the College will:

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- Inform the complainant in writing of their right to access an external complaints and appeals process
- Provide the relevant contact details for Resolution Institute or another appropriate external body
- Facilitate access to the external process where required
- Maintain appropriate records of the referral and outcome

The external review process is conducted independently of the College to ensure fairness, objectivity, and transparency in the resolution of the matter.

In addition to Resolution Institute, complainants may also seek assistance or lodge complaints with relevant external agencies, including:

- National Training Complaints Service
- Australian Skills Quality Authority (ASQA)
- Office of Fair Trading
- Office of the Australian Information Commissioner (for privacy-related matters)

Princeton International College will cooperate fully with any external investigation and will provide all relevant documentation as required.

### 9. Record Management

Princeton International College maintains comprehensive and accurate records of all complaints and appeals to ensure transparency, accountability, and compliance with regulatory requirements.

Records relating to complaints and appeals include, but are not limited to:

- Complaint and appeal application forms and supporting documentation
- All correspondence and communication records, including emails, letters, and meeting notes
- Investigation records, including evidence reviewed and actions taken
- Outcomes and decisions, including reasons for decisions
- Records of any internal or external appeals processes
- Continuous Improvement actions and outcomes arising from complaints and appeals

All records are:

- Stored securely within the College's approved record management systems, including the Student Management System and secure electronic document management systems
- Maintained in a manner that ensures confidentiality, integrity, and protection of personal information
- Accessible only to authorised personnel in accordance with role-based access controls
- Retained in accordance with the College's Records Management Policy and Procedure and applicable legislative and regulatory requirements

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Records are maintained in a format that allows for efficient retrieval for audit, review, and continuous improvement purposes. All complaints and appeals are also recorded in the Complaints and Appeals Register for monitoring, reporting, and continuous improvement purposes.

Retained for a minimum of five (5) years in accordance with the College's Records Management Policy and Procedures.

### 10. Continuous Improvement

Princeton International College recognises complaints and appeals as a valuable source of feedback and uses them to inform ongoing improvements to its systems, processes, and service delivery.

Complaints and appeals are managed within the College's Continuous Improvement and Quality Assurance Framework, and are subject to the structured improvement cycle of:

PLAN → MONITOR → ANALYSE → ACT → VERIFY → CONTROL

All complaints and appeals are:

- Recorded in the Complaints and Appeals Register
- Reviewed and analysed to identify trends, recurring issues, and root causes
- Assessed to determine any impact on compliance, service quality, or student outcomes
- Used to inform corrective, preventive, or improvement actions where required

Improvement actions arising from complaints are:

- Documented in the Continuous Improvement Register
- Assigned to responsible personnel with defined timeframes
- Monitored for implementation and effectiveness
- Verified prior to closure to ensure the issue has been resolved

The Chief Executive Officer (CEO) maintains oversight of all continuous improvement activities and ensures that outcomes from complaints and appeals are appropriately reviewed, actioned, and integrated into the College's governance and quality assurance processes.

### 11. Procedure – Complaints and Appeals Process

Princeton International College follows a structured and transparent process to ensure that all complaints and appeals are managed fairly, consistently, and in a timely manner.

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| Step | Stage                                  | What Happens                                                                                                                                                                                    | Responsibility                           | Records                                          |
|------|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------|--------------------------------------------------|
| 1    | <b>Information Provision</b>           | Students and stakeholders are informed about how to make a complaint or appeal through the Student Handbook, website, orientation, and direct communication with staff.                         | Student Support Officer / Administration | Handbook, website content, communication records |
| 2    | <b>Lodgement of Complaint / Appeal</b> | The complainant submits a complaint or appeal in writing using the Complaints and Appeals Form, or via email or other acceptable communication channels. Assistance is provided where required. | Complainant / Student Support Officer    | Complaint form, email, supporting documents      |
| 3    | <b>Acknowledgement</b>                 | The College acknowledges receipt of the complaint or appeal in writing within 24 hours and provides information                                                                                 | Administration Officer                   | Acknowledgement email/letter                     |

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| Step | Stage                                | What Happens                                                                                                                                                                                      | Responsibility                | Records                                        |
|------|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------------------------------------------------|
|      |                                      | about the process and expected timeframes.                                                                                                                                                        |                               |                                                |
| 4    | <b>Initial Review and Assessment</b> | The complaint or appeal is reviewed to determine its nature, seriousness, and whether it can be resolved informally or requires formal investigation.                                             | CEO / Student Support Officer | Review notes, classification records           |
| 5    | <b>Investigation and Resolution</b>  | The complaint is investigated, which may include gathering evidence, consulting relevant staff, and allowing all parties to present their case. Where possible, informal resolution is attempted. | CEO / Student Support Officer | Investigation records, evidence, meeting notes |
| 6    | <b>Outcome Decision**</b>            | A decision is made based on evidence. The outcome, including reasons for the                                                                                                                      | CEO / Student Support Officer | Outcome letter, decision records               |

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| Step | Stage                            | What Happens                                                                                                                                                                                                               | Responsibility                | Records                         |
|------|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------|
|      |                                  | decision, is provided in writing to the complainant.                                                                                                                                                                       |                               |                                 |
| 7    | <b>Appeal (if applicable)**</b>  | If the complainant is not satisfied, they may lodge an internal appeal. The appeal is reviewed by an independent or senior staff member not involved in the original decision.                                             | CEO / Independent Officer     | Appeal form, review notes       |
| 8    | <b>External Review</b>           | If the matter remains unresolved, the complainant is advised of their right to access an external appeals process through Resolution Institute or other relevant bodies. The College provides contact details and support. | CEO / Student Support Officer | Referral records, communication |
| 9    | <b>Implementation of Outcome</b> | Any decision or recommendation arising from the complaint or appeal (internal or external) is                                                                                                                              | CEO / Relevant Staff          | Action records, updated files   |

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| Step | Stage                    | What Happens                                                                                                                                                        | Responsibility      | Records                      |
|------|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------|
|      |                          | implemented promptly by the College.                                                                                                                                |                     |                              |
| 10   | Record Management and CI | All records are stored securely. The complaint is reviewed for trends and recorded in the Complaints Register and Continuous Improvement Register where applicable. | CEO / Admin Officer | Register entries, CI actions |

## 12. References

This Policy and Procedure is developed and implemented in accordance with the following legislation, standards, and regulatory frameworks:

- Standards for Registered Training Organisations (RTOs) 2025 (Outcome Standards)
- Education Services for Overseas Students (ESOS) Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Standard 10 – Complaints and Appeals)
- ELICOS Standards 2018
- Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010 (Cth))
- Privacy Act 1988 (Cth)