

# Student Complaints and Grievances Procedure

## Purpose

1. This Procedure gives effect to the complaints and grievances provisions of the **Student Complaints, Grievances and Appeals Policy** and outlines the processes at Global Higher Education (GHE) for the raising and management of complaints or grievances in relation to an academic and administrative decision or advice received.

## Scope

2. This Procedure applies to:
  - a) prospective GHE students;
  - b) current GHE students;
  - c) GHE graduates whose enrolment ended no more than six months before the complaint or grievance was lodged.

## Definitions

3. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

## Suite documents

4. This Procedure is linked to the following suite documents:
  - a) Student Complaints, Grievances and Appeals Policy;
  - b) Student Appeals Procedure;
  - c) Student Complaints and Grievances Procedure – Schedule One – Data collection for complaints, grievances and appeals
  - d) Student Complaints and Grievances Procedure – Schedule One: Complaints and grievances process flowchart.

## Procedure

### Grounds for complaints or grievances

5. Grounds for complaints include, but are not limited to:
  - a) a student being dissatisfied with the quality of service provided by GHE or an agent of GHE;
  - b) a student being dissatisfied with the quality of facilities or resources provided by GHE;
  - c) a student being dissatisfied with the timeliness of information and communication from GHE or an agent of GHE;
  - d) a student being dissatisfied with an aspect of academic delivery.
6. Grounds for grievances include, but are not limited to, the following:
  - a) a student being affected by a failure of GHE staff or an agent of GHE to adhere to published policies and procedures;
  - b) a student being given incorrect or misleading information by GHE staff or an agent of GHE;

- c) a student being negatively impacted by improper or negligent conduct by GHE staff or an agent of GHE;
- d) a student being negatively impacted by unfair treatment, prejudice or bias by GHE staff or an agent of GHE;
- e) a student being negatively impacted by a decision made without sufficient consideration of facts, evidence or circumstances;
- f) a penalty applied to the student being unduly punitive or inappropriate.

### **Data**

- 7. Data is collected in respect of all complaints and grievances (see **Schedule One** to this Procedure).
- 8. Data is stored in the Complaints, Grievances and Appeals Register.
- 9. Accurate collection and reporting of data are the responsibility of the Manager, Quality and Compliance.

### **Support for lodging complaints or grievances**

- 10. All students considering lodging a complaint or grievance are encouraged to seek support from the Student Support Officer, their Student Contact Officer or Student Advocacy. Students may also nominate a support person to accompany them to any meetings or mediations that may be held in the process of investigating or resolving a complaint or grievance.

### **Complaint processes**

- 11. Students wishing to make a complaint or a suggestion for improvement may do so as follows:
  - a) for issues of a general nature:
    - i. via the complaints online webform (<https://www.globalhe.com.au/complaints>);
    - ii. via email at ([complaints@globalhe.com.au](mailto:complaints@globalhe.com.au));
    - iii. verbally or in writing to their Student Contact Officer;
  - b) for academic issues, verbally or in writing to the relevant Course Coordinator or the Academic Director.
- 12. Complaints received via the online webform or email are received and noted by the Manager, Quality and Compliance and forwarded to the relevant department for action.
- 13. Where a complaint is received via the Student Contact Officer, the Course Coordinator or the Academic Director, they may choose to deal with the complaint directly or forward it to the relevant department for action.
- 14. Complaints may be anonymous. However, where an anonymous complaint is received GHE has the right to refuse to undertake a full investigation.
- 15. Within five working days of receipt of the complaint the relevant GHE member to whom the complaint is forwarded must, as appropriate to the complaint:
  - a) acknowledge receipt of the complaint;
  - b) arrange to discuss the matter with the student or indicate when an initial response will be provided and in what form;
  - c) attempt to clarify with relevant parties what is agreed and where opinions differ;
  - d) attempt to clarify the relevant policies, procedures or processes underpinning the action to which the complaint relates;
  - e) identify the appropriate manner of resolving the complaint, including seeking advice or a decision from other relevant parties;

- f) advise the student of a proposed process for resolving the complaint such as mediation or escalating the matter to a more senior officer. These processes may be appropriate if informal resolution is unlikely to be possible.
  - g) notify the student of his or her right to be accompanied by a support person at any meetings or discussions during the attempt at informal resolution.
16. Complaints will generally be finalised within 20 working days of the initial complaint.
  17. Any extension to this time period (for example, where mediation is an agreed outcome from clause 15f) must be approved by the Academic Director.
  18. Students may withdraw a complaint at any time during the resolution process, and the matter will be deemed to be resolved. Notwithstanding this, GHE reserves the right to continue to investigate a complaint to satisfy itself that its own policy and procedures are being adhered to and/or meet other regulatory or legal requirements.
  19. Students may at any stage refer the matter to an external agency / independent third party, as outlined in the **Student Appeals Procedure**. Where this occurs, GHE may cease any internal processes.
  20. The outcomes of complaints received in writing require a formal written response to the student, with a copy provided to the Manager, Quality and Compliance which must include the information outlined in **Schedule One** to this Procedure.
  21. Complaints received verbally do not require a formal written response. However, a detailed file note, which must include the information outlined in **Schedule One**, must be kept on the student file, with a copy provided to the Manager, Quality and Compliance.
  22. Information on the complaint will be recorded in the Complaints, Grievances and Appeals Register by the Manager, Quality and Compliance.
  23. Recommendations arising from investigation of complaints will be implemented as soon as practicable. Monitoring of implementation will be undertaken by the Manager, Quality and Compliance.
  24. Irrespective of the mode of response to the complaint, the student will be advised of their right to lodge a grievance if the complaint is not resolved to their satisfaction.

### **Grievance processes**

25. All grievances must be lodged in writing with the Manager, Quality and Compliance.
26. The Manager, Quality and Compliance may reject a grievance from a student who submits unreasonably persistent or vexatious complaints or grievances.
27. Within five working days of receipt of the complaint the Manager, Quality and Compliance must:
  - a) acknowledge receipt of the grievance;
  - b) arrange to discuss the matter with the student to ascertain that there is *prima facie* evidence to support the grievance before initiating an investigation and indicate when an initial response will be provided and in what form;
  - c) attempt to clarify with relevant parties what is agreed and where opinions differ;
  - d) attempt to clarify the relevant policies, procedures or processes underpinning the action to which the complaint relates;
  - e) identify the appropriate manner of resolving the complaint, including seeking advice or a decision from other relevant parties;
  - f) advise the student of a proposed process for resolving the grievance;
  - g) notify the student of his or her right to be accompanied by a support person at any meetings or discussions during any attempt at informal resolution.

28. Where *prima facie* evidence to support the grievance has been established the Manager, Quality and Compliance will appoint an independent investigator within 10 days of receipt of the complaint.
29. The independent investigator will normally be internal to GHE, be employed at a managerial level or above, and not have any direct link to the grievance or any conflict of interest. However, the Manager, Quality and Compliance, in consultation with the Chief Executive Officer (CEO), may appoint an external investigator if, for a particular grievance, it is deemed that an internal investigator may not provide the level of impartiality required.
30. Decisions on the appointment of an independent investigator rest solely with the Manager, Quality and Compliance in consultation with the CEO and are not subject to appeal.
31. The independent investigator must:
  - a) acknowledge receipt of the grievance in writing within five working days and indicate when a resolution of the matter should be expected;
  - b) review the grievance, including hearing from all parties who wish to partake in the process, and attempt to resolve the problem;
  - c) reference the relevant policies, procedures or processes underpinning the action to which the grievance relates;
  - d) notify the student and the Manager, Quality and Compliance if they conclude that the grievance is frivolous, or if no grounds could be found to support it;
  - e) provide the Manager, Quality and Compliance with a report of the investigation, including a resolution or the reasons(s) that a resolution could not be reached, and any recommendations for corrective and preventive action that need to be taken.
32. Students may withdraw a grievance at any time during the resolution process, and the matter will be deemed to be resolved. Notwithstanding this, GHE reserves the right to continue to investigate a grievance to satisfy itself that its own policy and procedures are being adhered to and/or meet other regulatory or legal requirements.
33. Students may at any stage refer the matter to an external agency / independent third party, as outlined in the **Student Appeals Procedure**. Where this occurs, GHE may cease any internal processes.
34. Prior to the release of the report from the independent investigator, the Manager, Quality and Compliance will undertake a quality check of the report to ensure that:
  - a) all issues raised in the grievance have been addressed;
  - b) all key stakeholders have been contacted and referenced;
  - c) the report is fair, balanced and respectful to all parties;
  - d) the findings and recommendations are evidence-based and defensible.
35. Upon completion of the quality check, the Manager, Quality and Compliance will provide a copy of the report to:
  - a) the CEO and the Academic Director;
  - b) the student, including advice on internal and external appeals processes.
36. The finalised status of the recommendations will be recorded in the Complaints, Grievances and Appeals Register by the Manager, Quality and Compliance.
37. Recommendations arising from investigation of grievances will be implemented as soon as practicable. Monitoring of implementation will be undertaken by the Manager, Quality and Compliance.

## Appeals

38. Students may appeal the outcome of any complaints and grievance processes in accordance with the **Student Appeals Procedure**.
39. In the event that internal processes do not resolve a complaint or grievance GHE will make provision for review by specified independent third parties in accordance with the **Student Appeals Procedure**.

## Referral to Independent Third Party

40. Students lodging a complaint or grievance are encouraged to act in good faith to resolve the matter.
41. Students may at any stage refer the matter to an external agency / independent third party, as outlined in the **Student Appeals Procedure**. Where this occurs, GHE may cease any internal processes.

## Reporting

42. A report on complaints, grievances and appeals is prepared by the Manager, Quality and Compliance to inform the annual GHE Quality Cycle Report (see **Quality Assurance Policy**).
43. The Board of Directors is responsible for making decisions in relation to corrective or preventative actions in response to any trends or systemic issues that are identified in annual reporting.
44. Summary complaints, grievances and appeals information will be made publicly available.

## Roles and responsibilities

45. The Board of Directors is responsible for the overarching governance of this Procedure.
46. The CEO, in conjunction with the Manager, Quality and Compliance is responsible for appointing independent investigators external to GHE.
47. The Manager, Quality and Compliance is responsible for:
  - a) accurate collection and reporting of complaints and grievance data;
  - b) overall management of grievance processes;
  - c) triaging and referring of complaints;
  - d) monitoring implementation of recommendations for corrective and preventive action;
  - e) ensuring compliance with this Procedure;
  - f) ensuring that students are adequately notified of the existence of this Procedure;
  - g) benchmarking GHE policy and standards with those adopted elsewhere in the tertiary sector;
  - h) the monitoring of information available from the review of records relating to the implementation of this Procedure;
  - i) all records management arising from this Policy and Procedure.
48. Staff receiving a complaint are responsible for ensuring that the complaint is addressed in accordance with the provisions in this Procedure.
49. All staff are responsible for becoming familiar and complying with this Procedure.

## Associated information

<b>Related Internal Documents</b>	<p>Student Complaints, Grievances and Appeals Policy</p> <p>Student Appeals Procedure</p> <p>Academic Progress Policy</p> <p>Admissions Policy</p> <p>Assessment Policy</p> <p>Critical Incident Policy</p> <p>Enrolment Policy</p> <p>Quality Assurance Policy</p> <p>Student Academic Integrity and Academic Misconduct Policy</p> <p>Student Disability Policy</p> <p>Student Diversity and Equity Policy</p> <p>Student Non-Academic Conduct and Misconduct Policy</p> <p>Student Sexual Assault and Sexual Harassment Policy</p> <p>Student Wellbeing, Orientation and Support Policy</p> <p>Work-Integrated Learning Placement Policy</p> <p>Glossary of Terms</p>
<b>Related Legislation, Standards and Codes</b>	<p><i>Tertiary Education and Quality Standards Agency Act 2011</i></p> <p><i>Higher Education Standards Framework (Threshold Standards) 2021</i></p> <p><i>Education Services for Overseas Students Act 2000</i></p> <p><i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i></p> <p>TEQSA Guidance Note: Grievance and Complaint Handling, Version 1.1, Feb 2019</p>
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## Change history

<b>Version Control</b>	Version 1.4	
<b>Change Summary</b>	6-Mar-20	V1.0 Draft approved by Board of Directors 21-Feb-20 including minor amendments (cl. 17) plus administrative updates
	20-Jul-20	V1.1 administrative updates
	11-Aug-21	V1.2 Addition of Schedule Two Flowchart and HESF2021 compliance approved by CEO 11-Aug-2021
	27-Jan-23	V1.3 proposed minor amendment to respond to TEQSA feedback approved by CEO
	29-Jun-23	V1.4 minor addition of cl 44 approved by CEO 29-Jun-23 and administrative updates following TEQSA registration

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# Schedule One – Data collection for complaints, grievances and appeals

Table 1: Complaints, Grievances and Appeals Data

Category	Metadata
Identifiers	Student ID [unless complaint is anonymous]
	Date Received
	Date Closed
About the Student	Year of Study [First, Second, Third year, Completed]
	Course Type [Bachelor, Master]
	Course Code
	Fee Type
About the Complaint/Grievance/Appeal	Status [Complaint; Grievance; Complaint to Grievance; Appeal]
	Type [Administrative; Academic]
	Root Cause [see Table 2]
	Outcome
	Resolution [Accepted; Not Accepted]
	Escalation [Ombudsman; Other External Body; Unknown; Nil]
	Outcome/Improvement Action [Free field]

Table 2: Root Causes Fields

List of causes
Academic support
Administration of assessment
Admission
Agents
Conduct of examinations
Course content
Course requirements
Course structure
Credit
Deferral
Enrolment
Facilities [Including provision, standard and access to facilities, etc.]
Fees
General support
Information technology
Information/Advice [including course and unit information, study advice, website information, etc.]
Intermission
Internal transfer
Learning Management System
Marketing information
Orientation
Other (to be defined)
Records [including transcripts, testamurs, access to records, etc.]
Timetabling

# Schedule Two – Complaints and grievances process flowchart

## Summary of process for complaints or suggestions for improvement

*COMPLAINT - any formal expression of dissatisfaction with an aspect of GHE service, care or information to students which can be resolved through informal negotiation and active communication*

Students may make complaints whether of a general or academic nature via the online webform, email, in writing or verbally			<i>Notes</i>
Webform / email	Verbally	In writing	<i>Anonymous complaints GHE has the right to refuse a full investigation</i>
GHE notes and forwards to relevant department for action	GHE deals with directly or forwards to relevant department for action	GHE deals with directly or forward to relevant department for action	
GHE responds within 5 working days to propose process for informal or formal resolution of complaint. Complaints generally to be finalised within 20 working days. Extension of time (e.g. for mediation) to be approved by Academic Director.			<i>Students may withdraw complaint at any time during process. GHE may continue to investigate</i>
GHE will provide a formal written response	No formal written response required	GHE will provide a formal written response	
Complaint information recorded by GHE. Recommendations arising from complaint will be implemented and monitored by GHE.			



**Summary of process for GRIEVANCES**

*GRIEVANCE - a matter to be investigated according to formal processes. This includes complaints which are not able to be resolved through informal processes or mediation, and matters relating to allegations of misconduct where disciplinary action against a student or staff member may be an outcome of the investigation.*

