

RTO Complaints Handling Policy and Procedure

Purpose

This policy ensures that complaints made to the Centre of Professional Learning and Education (CPL | 88148) regarding training or administration services and programs are dealt with in a controlled manner to promote fair, consistent and timely resolve. It aims to ensure that complaints and subsequent outcomes of associated investigations are used to drive continuous improvement activities and ongoing commitment to quality.

Introduction

A complaint is generally negative feedback about services or individuals which has not been resolved locally. It may involve issues concerning:

- CPL training or assessment services, its trainers, assessors or other staff,
- A third party's services provided on behalf of CPL, its trainers, assessors or other staff; or,
- A student of CPL.

A complaint may be received by CPL in any form and does not need to be formally documented by the complainant in order to be acted on. Complaints may be made by any person but are generally made by students and/or employers.

This policy supports Clauses 1.7, 5.4 and 6.1 to 6.6 of the Standards for Registered Training Organisations (RTO) 2015.

Authorisation

The policy shall be issued and endorsed under the RTO Manager.

Policy

Frequently, the complaints handling process will expose weaknesses in the training and assessment system that can flow into the continuous improvement system as opportunities for improvement. This outcome of complaints handling is very positive and should be actively applied by all persons involved. It is for this reason that complaints received from stakeholders should be seen in a positive light and as opportunities for improvement.

CPL will apply the following principles to its complaints handling:

- A written record of all complaints is to be kept by CPL including all details of lodgement, response and resolution. Communities at Work's 'Get in Touch' system is to be used to maintain a record of the event.
- Records relating to complaint handling will be stored securely to prevent access to unauthorised personnel.

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- A complainant is to be provided an opportunity to formally present their case at no cost.
- Each complainant may be accompanied and/or assisted by a support person at any relevant meeting at her/his own costs of the support person accompanying.
- This RTO Complaints Handling Policy and Procedure must be publicly available. This means that it must be published on the Communities at Work website alongside the RTO Appeals Policy and Procedure.

Complaints Handling Processes

- The handling of a complaint is to commence within five (5) business days of the lodgement of the complaint with all reasonable measures taken to resolve the issue as soon as practicable.
- The complainant is to be provided a written response to the complaint, including details of the reasons for the outcome. A written response must be provided to the complainant within fifteen (15) business days of the lodgement of the complaint.
- Complaints must be resolved within sixty (60) calendar days of the complaint being initially received. Where CPLE considers that more than 60 calendar days are required to process and finalise the complaint, the RTO Manager will inform the complainant in writing, including reasons why more than 60 days are required.
- As a benchmark, CPLE will attempt to resolve complaints as soon as possible. A timeframe to resolve a complaint within thirty (30) calendar days is considered acceptable and in the best interest of CPLE and the complainant. A complainant should be provided with regular updates to inform them on the progress of the complaint handling process. Updates should be provided to the complainant at weekly intervals over the timeframe of resolution.
- CPLE shall maintain the enrolment of the complainant during the complaint handling process in the event they are a student. Decisions or outcomes of the complaint handling process that are found to be in the favour of the complainant shall be implemented immediately.
- Complaints are to be handled in the strictest of confidence. CPLE representatives are not to disclose information to any person without the permission of the RTO Manager. A decision to release information to third parties can only to be made after the complainant has given permission for this to occur. This permission should be given using the [Release of Personal Information Form](#).
- Complaints are to be considered and handled to ensure the principles of natural justice and procedural fairness are applied at every stage of the complaint handling process. This means that the complainant is entitled to be heard with access to all relevant information and with the right of reply. The complainant is entitled to have their complaint heard by a person that is without bias and may not be affected by the decision. Finally, the decision must be made based on logical evidence and the decision-maker must take account of relevant considerations, must act for a proper purpose and must not take into account irrelevant considerations.
- When a complaint against CPLE is upheld, CPLE shall ensure to:
 - Accept responsibility,
 - Explain what went wrong and why, and
 - Develop and implement reasonable changes with the primary objectives of preventing the issue from reoccurring and improving quality output without impeding compliance.

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Procedures

Verbal Feedback and Complaints

Verbal feedback and complaints are generally handled at the time of initial contact. In most cases, verbal complaints are likely to be simple queries or clarification points. To verify that the issue/s discussed under this arrangement are minor, the conversation must include the following:

- Informing the complainant or person providing feedback of their right/option to formalise (put into writing) the feedback or complaint if dissatisfied with the proceedings;
- Offering assistance/guidance on the online process of registering feedback or a complaint in the event formalisation is requested.

Formal Complaints Processes

Complaints that cannot be resolved at the time they occur should be referred to CPLE's RTO Manager for review. The following procedure is to be followed when a formal complaint is received.

- A formal complaint can be received by the via the 'Get in Touch' contact portal, in person, email or phone. For complaints that are received in person, email or phone, it is the responsibility of the CPLE staff member to immediately record the complaint into the 'Get in Touch' contact portal to be actioned and monitored. The contact portal complies a register of feedback and complaints.
- When complaints and/or feedback is received through the 'Get in Touch', portal it is the responsibility of the Executive Assistant to the Chief Executive Officer to ensure that the feedback is forwarded to the RTO Manager.
- Complaints are forwarded onto the RTO Manager who will acknowledge the complaint within (5) business days and review actions to be taken. The RTO Manager is to advise the complainant of the procedure to be used to handle the complaint received.
- The RTO Manager may choose to consult with the complainant, with others within CPLE or relevant agencies external to CPLE in determining their recommendations.
- The RTO Manager is to commence their review of the complaint within five (5) business days from the date the complaint was submitted, and may choose to make inquiries about the matter or may task another person to research the matter against relevant policies and procedures.
- The RTO Manager is to finalise their response to the complainant and provide the complainant a response in writing via email as soon as possible but no later than fifteen (15) business days from when the complaint was submitted unless the complainant is advised of the reason why a longer period of time is required.
- The complainant has the right to be accompanied by a support person to any meeting or interview as part of a negotiation. Their role is to assist the complainant to prepare and present their case, to clarify points and ensure that the records are an accurate and fair reflection of the meeting, as well as monitoring the wellbeing of the complainant. The complainant will bear the costs of a support person accompanying.
- The RTO Manager is to seek feedback from the complainant about their level of satisfaction with the complaint outcome and advise the complainant of their options if they are not completely satisfied with the outcome.
- The RTO Manager is responsible for the resolution of the feedback lodged through the 'Get in Touch' portal and items actioned. When the feedback is resolved, the RTO Manager is to change the status in the portal to 'closed'.

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- All records of complaints, actions and communications taken will be kept on file, both in the CPLE Continuous Improvement Register and on the student's record within the Student Management System used by CPLE in the event the complainant is enrolled with the RTO.

Review by the Chief Executive Officer

In the event complainants are not satisfied with the outcome of the RTO Managers decision, they have the right to request a third-party review of the situation. In such circumstances, the RTO Manager will inform the Chief Executive Officer for the sake of determining who the third party may be. All decision made during consultations between the RTO Manager and CEO will be relayed to the complainant in writing via email within ten (10) business days of the third-party review request.

The third party to review the complaint must be agreed upon by all parties, with the complainant to bear any costs involved. If any fees or charges are incurred during this process, the complainant will be informed in writing via email, prior to engagement with the third party of the same informed decision making. Agreement from the complainant to pursue engagement with the third party, must be received in writing.

Complainants will be updated weekly via email, of progress of third-party review. Upon an outcome being achieved, the complainant will be informed by the RTO Manager in writing via email of the final decision.

If the matter is unresolved after being reviewed by a third party or the complainant is not satisfied with the outcome, the complainant may be directed by the RTO Manager to contact:

- Australian Skills Quality Authority (ASQA) through the Online Complaint Form.
- Skills Canberra (STA) via skills@act.gov.au
- National Training Complaints Hotline on 13 38 73.

The RTO Manager is responsible for the resolution of the feedback lodged through the 'Get in Touch' portal and items actioned. When the feedback is resolved, the RTO Manager is to change the status in the portal to 'closed'.

All records of complaints, actions and communications taken will be kept on file, both in the CPLE Continuous Improvement Register and on the student's record within the Student Management System used by CPLE in the event the complainant is enrolled with the RTO.

CPLE will be proactive in identifying potential causes of formal complaints and will take action to eliminate or mitigate the likelihood of a reoccurrence.

Definitions

Complaint	An expression of dissatisfaction, whether justified or not.
Complainant	The person making the complaint.

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Responsibilities

Chief Executive Officer

- Ensuring that complaints are managed in a transparent manner in accordance with the principles of natural justice and procedural fairness.
- Offering independent review of decisions, where required.

RTO Manager:

- Ensuring that the complaints handling process operate in a transparent manner in accordance with the principles of natural justice and procedural fairness.
- Considering independent review of decisions where required.
- Determining independent internal or external third parties to review complaint processes.
- Ensuring that complaints handling processes and outcomes are used to inform continuous improvement strategies within RTO internal audit processes.
- The accurate and timely documentation of complaints as outlined in this procedure.
- Ensuring that students are fully informed of the RTO's policy and procedures for handling complaints.
- Assisting complainants and students to resolve concerns directly and informally with parties involved in the first instance.
- Assisting a complainant or students to lodge a formal appeal in line with CPLE policy and procedure requirements
- Actioning administrative process within the 'Get in Touch' system.

CPLE Employees:

- Conducting themselves in a manner consistent with CPLE Policies and Procedures to minimise the incidence of complaints.
- The accurate and timely documentation of complaints as outlined in this procedure
- Ensuring that students are fully informed of the RTO's policy and procedures for handling complaints.
- Assisting a complainant or student to resolve concerns directly and informally with parties involved in the first instance.
- Assisting a complainant or student to lodge a formal appeal in line with CPLE policy and procedure requirements.

Attachments & Forms

1. RTO-PRG-FOR-002 Release of Personal Information Form

Related Documents:

1. ORG-QMS-POL-001 Purpose, Mission and Values
2. RTO-RPG-POL-001 RTO Appeals Policy and Procedure

References

1. ISO 9001:2015 Quality Management System
2. ISO 3100: 2018 Risk Management
3. ISO 45001: 2018 Occupational Health and Safety

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4. AS ISO/IEC 27004:2018 Information Security Management
5. Standards for Registered Training Organisations (RTO's) 2015

Document Contact

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Review Specifications

OFFICE USE ONLY			
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