

Axiom College is committed to providing a fair and transparent complaint handling process.

The following policy and procedures are designed to allow for the effective and timely reporting and follow up of complaints from clients of training courses, training programs and assessments conducted by Axiom College.

### **WHAT IS A COMPLAINT?**

A complaint is generally negative feedback about services or people which has not been resolved locally.

### **WHO DOES THIS POLICY APPLY TO?**

This policy applies to and may involve issues concerning the conduct of:

- Axiom College as an organisation, its trainers, assessors or other staff;
- Third party services provided on behalf of Axiom College, its trainers, assessors or other staff; or
- A learner of Axiom College

This is an important point to note in understanding that this policy has a broad application and is not simply relevant to complaints that may be made by learners. A complaint may be made by an employer about Axiom College or by the trainer about the conduct of the learner. Throughout this policy we refer to the person making a complaint as simply the complainant.

### **POLICY**

Axiom College will meet the needs of all clients and will actively seek feedback on the range of services provided via a range of methods. However, if we fail to satisfy a client in any area of service, then we are happy to discuss their issue and concerns and take appropriate steps to rectify the area of concern to a level mutually agreed by the client and the management of Axiom College. If a client is dissatisfied with a decision made by an Axiom College staff member or contractor, then we are happy to consider their issues, offer feedback, seek additional information, and if appropriate amend the original decision based on the new information. Please refer to Axiom College's Appeal policy for policy and procedures relating to lodging appeals

The following procedures are to be followed:

#### **EARLY RESOLUTION OF COMPLAINTS**

In all cases, issues that arise during training and assessment that are the source of frustration or are in dispute should be resolved at the time they occur between the persons involved. It is often the case that complaints can be avoided by proper communication and respect between persons involved.

#### **RELATIONSHIP TO CONTINUOUS IMPROVEMENT**

Frequently, the complaints handling process will explore weakness in the training and assessment or administrative 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.

#### **MAKING A COMPLAINT**

- A complaint may be received by Axiom College 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.
- The complaints policy and procedure is available to the public at Axiom College's website – [Policy & Procedures](#)
- To make a complaint;
  1. In the first instance, where a person feels that they are dissatisfied with some aspect of the service provided by Axiom College staff or contractors, it is suggested that they speak with the person in charge of delivering the service in an attempt to resolve the problem.
    - a. If your situation concerns a piece of assessment, then you should speak to your Trainer;
    - b. If your situation concerns your enrolment or refund, then you should speak to the Support Team
  2. In the situation where a client feels uncomfortable or unable to approach the Axiom College staff member, they may speak directly with either the Training Consultant who sold the service to the client or the Compliance Manager. It is intended that the issues of concern be resolved at the lowest staffing level with minimal impact.
    - a. The Compliance Manager will then:

- i. Assess the circumstances of the issue and establish the most appropriate internal action and follow up required
  - ii. Advise the client that their issues can be made in writing as a complaint, if they choose
  - iii. Document the complaint and discussion in the student management system
3. If the situation cannot be resolved, the client is advised to formalise the complaint in writing. The preferred method of accepting the complaint is via email to [compliance@axiomcollege.com.au](mailto:compliance@axiomcollege.com.au).
  - a. The written complaint can be submitted to the Compliance Manager either in hard copy or electronically via the following contact details:
    - i. Axiom College – PO BOX 1041, Milton, QLD, 4064
    - ii. [compliance@axiomcollege.com.au](mailto:compliance@axiomcollege.com.au)
  - b. If a complainant has any difficulty assessing the required form or submitting the complaint to Axiom College, they are advised to contact Axiom College immediately at the following phone number: 07 3510 8000

A written record of all complaints is to be kept by Axiom College including all details of lodgment, response and resolution. The complaints register within the student management system is to be used to record the details of the complaint and to maintain a chronological journal of events during the complaint handling process. Records relating to complaints handling must be stored securely to prevent access to unauthorised personnel.

The complaint is referred to the management team; who will review the complaint and determine if investigation or consultation is required; or if the matter can be solved internally.

Complaints are to be handled in the strictest confidence. NO Axiom College representative is to disclose information to any person without the permission of Axiom College Management Team. A decision to release information to third parties can only be made after the complainant has given permission for this to occur.

#### **COMMUNICATING THE COMPLAINT HANDLING POLICY AND PROCEDURE**

The complaints handling policy must be:

- Publicly available on the Axiom College Website
- Integrated into the Axiom College Student Handbook
- Included in the Axiom College Policy and Procedure Manual

#### **COMPLAINT HANDLING TIMEFRAME**

Written acknowledgement by Axiom College no later than 48 hours (Working Days) from the time the complaint is received. This acknowledgement is intended to provide the complainant assurance that Axiom College has received the complaint and will review the relevant issues and provide a response as soon as practical. The acknowledgement must inform the person that they will receive a written response.

- The handling of a complaint is to commence within seven (7) working days of the lodgment of the complaint and all reasonable measures are taken to finalise the process as soon as practicable.
- A written response or update must be provided to the complainant within fourteen (14) working days of the lodgment of the complaint.
- As a benchmark, Axiom College should 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 Axiom College and the complainant.
- A complainant should also be provided with regular updates to inform them of the process of the complaint handling. Updates should be provided to the complainant at a minimum of two (2) weekly intervals.
- Complaints must be resolved to a final outcome within sixty (60) calendar days of the complaint being initially received. Where Axiom College's Compliance Manager considers that more than 60 calendar days are required to process and finalise the complaint, the team must inform the complainant in writing, including reasons why more than 60 calendar days are required.
- All details relating to the complaint must be recorded in the student management system by any staff member who is involved in any aspect of the complaint.

## PRINCIPLES OF NATURAL JUSTICE AND PROCEDURAL FAIRNESS

A complainant is to be provided an opportunity to formally present his or her case at no cost. The principles of Natural Justice and Procedural Fairness must be incorporated into the complaint handling process to ensure that decision-making is fair and reasonable. Natural justice must be observed when it affects the rights, interests or legitimate expectations of individuals. The following principles are to be applied:

- **Compliance Manager bias.** Where the Compliance Manager of Axiom College feels that they may have bias or there is a perception of bias process or where the person making the complaint is not satisfied with how the matter has been handled, the complainant is to be referred directly to an independent third-party for consideration and response.
- **Responding to Allegations.** Where a complaint involves one person making allegations about another person, it is a requirement for Axiom College to hear both sides of the matter before making any judgements about the complaint should be settled. A person who will be affected by a decision made by Axiom College as a result of a complaint has the right to be fully informed of any allegations and to be provided adequate opportunity to be heard and respond. The person has the right to:
  - Put forward arguments in their favour,
  - Show cause why a proposed action should not be taken,
  - Deny allegations,
  - Call for evidence to disprove allegations and claims,
  - Explain allegations or present an innocent explanation, and
  - Provide mitigating circumstances (information aimed at reducing the severity, seriousness of something).

Axiom College also has an obligation to fully consider the substance of allegations and the response provided by parties before making a decision. Decisions must be communicated to the complainant and relevant person's subject of allegations in writing. This is to include advising these persons of their right to seek a third-party review of decisions made by Axiom College.

- **Referring matters to authorities.** Where an allegation is made that involves alleged criminal or illegal activity and it is considered outside the scope and expertise of Axiom College to investigate the matter, then in these circumstances Axiom College reserve the right to report these allegations to law enforcement authorities. Persons related to the matter involving alleged criminal or illegal activity will be advised in writing if this course of action is being taken.

**Third Party Review.** Where the person making a complaint is not satisfied with the handling of the matter by Axiom College, they have the opportunity for a body or person that is independent of Axiom College to review his or her complaint following the internal completion of complaint handling process. Before a person seeks a review by an independent third party, they are requested to first allow Axiom College to fully consider the nature of the complaint and to respond to the person in writing. If after this has occurred, the person is not satisfied with the outcome, they have the right to refer the matter to any external authority/agency that may be relevant to their complaint (at their own cost). Axiom college may choose to also refer the complaint to an independent third party for review.

## UNRESOLVED COMPLAINTS

Once the complaint handling process has concluded; where the person making a complaint remains not satisfied with the outcome of the complaint handling procedure, the person is to be advised that they have the right to refer the matter to any external authority/agency that may be relevant to their complaint.

The following external agencies are nominated in the first instance as relevant points of referral the person may consider:

- In relation to consumer related issues, the person may refer their complaint to the Office of Fair Trading.
- In relation to the delivery of training and assessment services, the person may refer their complaint to the National Training Complaints Service via the following phone number: 13 38 73 or visit the website at <https://www.education.gov.au/NTCH>
- In relation to matters relating to privacy, the person may refer their complaint to the Office of the Australian Information Commissioner via the following details: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint> or call on 1300 363 992

This guidance is also communicated to learners within the Learner Handbook and also within the publicly available policies and procedures on Axiom College website. It is expected that the above agencies will investigate the persons concerns and contact Axiom College for information. External agencies will typically request a copy of any record of how the complaint was handled from the person. Axiom College is to ensure that the person is provided with a written response that they may use for this purpose.

Axiom College is to cooperate fully with agencies such as the National Training Complaints Service, the Office of Fair Trading or ASQA that may investigate the handling of a complaint. Axiom College considers that it would be extremely unlikely that a complaint is not able to be resolved quickly within Axiom College internal arrangements.

### RECORD MANAGEMENT OF COMPLAINT RECORDS

Records relating to complaints will present in two formats. There will be electronic records in the form of email correspondence and other documents which are communicated electronically and hard copy records which are submitted by the complainant or generated by Axiom College. There is also a record of the complaint maintained within the Axiom College student management system. This includes the details about the complaint and a diary log which records the progress of the complaint handling and closure. This record also records identified opportunities for improvement that result from complaints handling.

All records regardless of their format will be saved in a digital format into a secure folder located on Axiom College's file storage. Records stored on the student management system are to be accessible only to persons given the authority through the permission structure of the management system.

To ensure records are maintained in a safe and suitable condition, the following is to apply:

- Records must be kept securely to prevent them being accessed by any non-authorised personnel.
- Records must be kept confidential to safeguard information and to protect the privacy of complainants.
- Records must be kept to avoid damage by fire, flood, termites or any other pests.
- Electronic data storage must be safe from destruction by fire or flood and should take account of the risk of component failure of a single storage device. Electronic data is also to be backed-up off site.

A correspondence record must be made for each complainant making a complaint. All email and letter communication should be retained with the complainant correspondence record within the complaint register.

### PERIOD OF RETENTION OF COMPLAINTS RECORDS

Axiom College is to retain records relating to complaints handling for a minimum of five (5) years.

### DESTRUCTION OF COMPLAINTS RECORDS

Axiom College's Director is the only person who can authorise (in writing) the destruction of complaint handling records. Records are only to be authorised for destruction after the retention period has lapsed. Documents identified for destruction are to be shredded before being recycled.

### COMPLAINT HANDLING PROCEDURE

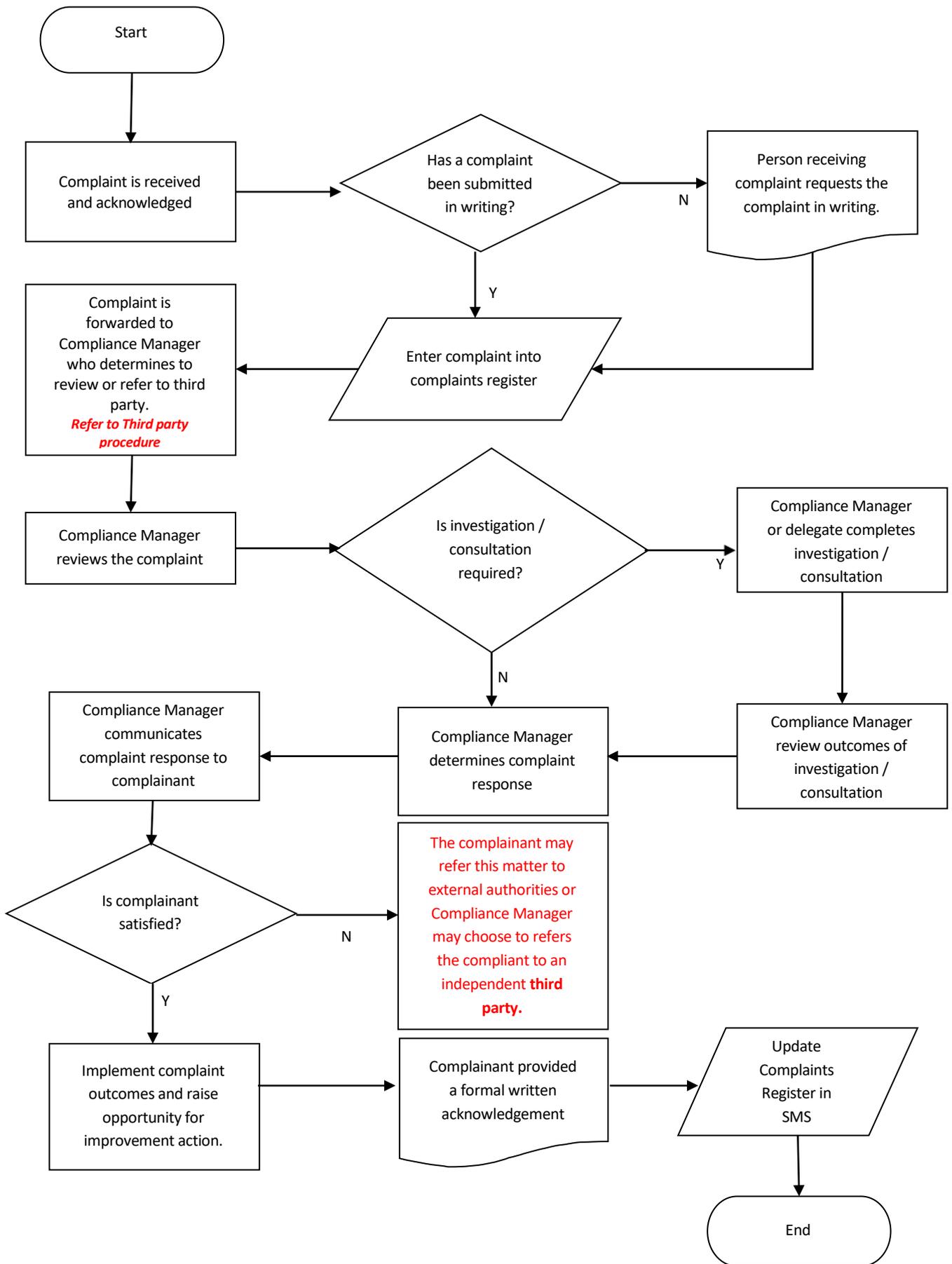
Axiom College will apply the following procedure to its complaint handling:

- a) A complaint may be received in any form (written or verbal) although persons seeking to make a complaint are recommended to complete the complaint form which is available to them on the website. There is no time limitation on a person who is seeking to make a complaint.
- b) The complainant must be provided a written acknowledgement as soon as possible and no later than 48 hours from the time the complaint is received. The acknowledgement must inform the complainant that they will receive a written response within 14 days and explain the complaints handling process and the person's rights and obligations.
- c) The complaint must be entered into the complaints register in the student management system. The complaints register identifies the complainant, relation with Axiom College, nature of complaint, findings/outcomes. Prior to entering the complaint into the register, check if the person has not already submitted a complaint, if it is accurately recorded or if it has been recorded as a subsequent contact.
- d) The complaint is emailed to the Compliance Manager for review. The Compliance Manager will determine if the complaint requires further investigation or consultation.
- e) Where a complaint is made about or involves allegations about another person, Axiom College is obliged to inform this person about this complaint or allegation and provide them the opportunity to respond and present information in response to the issues raised.
- f) Where a complaint is received by Axiom College which involve allegations about alleged criminal conduct, Axiom College will recommend the person making the complaint refer the matter to the relevant State or Territory Police Service.
- g) The Compliance Manager reviews the outcomes of the investigation/consultation and determines the complaint response within an acceptable timeframe. The complaints response email/letter template can be used to identify the findings and outcomes to the complainant.
- h) If currently enrolled, Axiom College shall maintain the enrolment of the complainant during the complaint handling process.
- i) Decisions or outcomes of the complaint handling process that find in favour of the learner shall be implemented immediately.

- j) The complainant is entitled to be heard with access to all relevant information and with the right of reply ensuring natural justice and procedural fairness is applied at every stage of the complaint process.
- k) Axiom College must request written acknowledgement from the complainant once the complaint has been resolved.
- l) Complaint handling procedures should conclude with an analysis of the circumstances to identify any opportunities for improvement.
- m) The complaint must be accurately updated and recorded in the Complaints Register in the student management system.

It is not necessary that all of the preceding steps are taken if the complaint appears to be satisfactorily resolved at any earlier stage, or if a step is considered to be inappropriate to the circumstances surrounding that complaint.

**COMPLAINTS HANDLING PROCESS**



**THIRD PARTY REVIEW PROCESS**

