

Complaints/Appeals Policy and Procedure

Purpose:

This policy and procedure sets out how Southern Cross Rail Training (SCRT) receives, manages, resolves, records and reviews complaints and appeals relating to its operations, services, training and assessment.

This policy is designed to ensure that complaints and appeals are handled fairly, transparently, confidentially and efficiently, and that outcomes are used to support continuous improvement across SCRT's services and systems.

Regulatory basis:

This policy supports SCRT's compliance with the Standards for Registered Training Organisations (RTOs) 2015, including the requirement for an RTO to have and apply a complaints and appeals process that is fair, transparent and accessible.

This policy also aligns with the 2025 Standards for RTOs, including:

- Standard 2.7 relating to feedback, complaints and appeals,

which emphasises effective management of concerns and use of outcomes to improve quality.

Scope

This policy applies to all SCRT employees, trainers, assessors, administrative staff, contractors, third-party providers, students, prospective students, employers and other stakeholders who interact with SCRT products or services.

This policy applies to complaints and appeals arising from, or connected with: Training delivery.

- Assessment practices and assessment outcomes.
- Student support and administration.
- Enrolment, marketing and information provided to clients.
- Staff, contractor or representative conduct
- Decisions made by SCRT that affect a person's interests, participation or outcomes.
- Third-party delivery or services conducted on behalf of SCRT (SCRT currently have no third party agreements).

Policy Statement

SCRT is committed to providing a complaints and appeals framework that is accessible, responsive, impartial and consistent with the principles of natural justice and procedural fairness.

SCRT will ensure that any person making a complaint or appeal is treated respectfully and that their matter is considered on its merits, based on evidence and without bias.

SCRT will ensure that complainants and appellants are not victimised, harassed, vilified or otherwise disadvantaged because they have raised a concern or sought review of a decision.

SCRT will maintain clear information about how to lodge a complaint or appeal, including access through its website, student information materials and direct contact with SCRT staff.

SCRT will securely retain records of complaints, appeals, investigations, findings, actions and outcomes, and will use this information to identify trends, address root causes and improve its systems, services and practices.

Principles

The following principles apply to all complaints and appeals managed under this policy:

- **Accessibility:** information about the process will be easy to locate, understand and use.
- **Fairness:** all parties will be given a reasonable opportunity to present their case and respond to relevant information.
- **Confidentiality:** information will be disclosed only to those who need it to investigate, decide or implement an outcome, unless disclosure is required by law.
- **Timeliness:** matters will be acknowledged, investigated and finalised as quickly as practicable.
- **Evidence-based decision making:** findings will be made on the basis of available facts and substantiated evidence.

Continuous improvement: complaint and appeal outcomes will be reviewed for systemic issues and preventive action.

Definitions

Complaint means an expressed or implied statement of dissatisfaction about SCRT's training, assessment, administration, support services, staff conduct, marketing, decisions or other operations, where a response or resolution is sought or reasonably expected.

Appeal means a formal request for review of a decision made by SCRT, including but not limited to assessment outcomes, enrolment decisions, recognition decisions, disciplinary actions or the outcome of a complaint.

Grievance means a formally raised complaint concerning conduct, treatment, fairness or conditions that is perceived to have caused disadvantage, harm or injustice to a person or group.

Complainant means the person or party making a complaint.

Appellant means the person or party lodging an appeal.

Natural justice and **procedural fairness** means a process in which decision-makers act without bias, consider relevant evidence, allow affected parties a reasonable opportunity to respond, and provide reasons for decisions where appropriate.

Third-party provider means any contractor, partner or other organisation or individual engaged by SCRT to provide services on its behalf.

Rights of complainants and appellants

A person making a complaint or appeal has the right to:

- Access this policy and associated forms and guidance.
- Raise a matter without fear of disadvantage or retaliation.
- Be supported by a representative or support person at any formal meeting, where appropriate.
- Receive acknowledgement of their complaint or appeal and updates where delays arise.
- Receive a written outcome and reasons for the decision.
- Access an internal review and, where relevant, information about external complaint avenues.

Responsibilities

Chief Executive Officer/Director

The Chief Executive Officer or Director is responsible for ensuring SCRT has an effective complaints and appeals framework, sufficient resources to implement this policy, and oversight of serious, high-risk or systemic matters arising from complaints and appeals.

Training Manager

The Training Manager is responsible for managing the operation of this policy, acknowledging and investigating complaints and appeals, appointing appropriate decision-makers or reviewers, maintaining records, ensuring procedural fairness, and overseeing corrective and preventive actions

Where the Training Manager is the subject of a complaint or has a conflict of interest, the matter must be referred to the Chief Executive Officer, Director or another authorised senior delegate for management and decision.

Trainers, Assessors, Staff and Representatives

Trainers, assessors, staff, contractors and representatives of SCRT must respond professionally to concerns, attempt informal resolution where appropriate, escalate matters promptly when required, cooperate with investigations and comply with any directions or corrective actions arising from an outcome.

Complainants and Appellants

Complainants and appellants are expected to provide timely, honest and relevant information about the matter and to participate respectfully in the process.

Access to the process

Information about SCRT's complaints and appeals arrangements will be made available through the SCRT website, the Student Information Handbook, enrolment information and by request from SCRT staff.

A person may raise a concern verbally in the first instance. Where the matter is not resolved informally, or where the matter is serious, complex or unsuitable for informal handling, the person will be invited to lodge a formal written complaint or appeal.

Formal complaints and appeals should be submitted using SCRT's approved forms, including Complaints Appeals Office Form Document 52(a) and Complaints Appeals Public Form Document 52(b), or by another written method accepted by SCRT.

Procedure

1. Informal resolution

Where appropriate, students, clients, staff or other stakeholders are encouraged to first discuss the issue with the relevant SCRT trainer, assessor, staff member or representative to seek an early and informal resolution.

The SCRT representative receiving the concern must take the matter seriously, listen respectfully, clarify the issue and either attempt to resolve it directly or escalate it to the Training Manager where additional support or authority is required.

If the matter is resolved informally, a brief record of the issue and resolution may be retained where this is necessary for quality assurance, risk management or follow-up.

If the issue is not resolved to the person's satisfaction, or if informal resolution is not appropriate, the person must be advised of the formal complaints or appeals process.

2. Lodging a formal complaint

A formal complaint should be made in writing to the Training Manager and should include, where available:

- The nature of the complaint.
- The person or persons involved.

- Relevant dates, times, locations and circumstances.
- Any supporting documents or evidence.

The outcome sought by the complainant, where appropriate.

A complaint may be lodged through the SCRT website, by email, by post or by another method approved by SCRT.

3. Lodging an appeal

An appeal should be lodged in writing with the Training Manager within twenty (20) business days of the person being notified of the decision being appealed, unless SCRT accepts a later submission due to exceptional circumstances.

The appeal should clearly identify the decision being challenged, the reasons the decision is disputed, any supporting evidence and the outcome sought.

Appeals may relate to assessment decisions, recognition decisions, enrolment decisions, disciplinary action, administrative decisions or the outcome of a prior complaint.

4. Acknowledgement and Registration

SCRT will acknowledge receipt of a formal complaint or appeal in writing within five (5) business days.

Each matter will be entered into the Complaints and Appeals Register, assigned a reference number and monitored through to closure.

5. Preliminary Assessment

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Following receipt, the Training Manager or delegate will conduct a preliminary assessment to determine

- Whether the matter is a complaint or an appeal.
- Whether urgent risk controls are required, including where there are welfare, safety or integrity concerns.
- Whether the matter can be resolved quickly through clarification or facilitated discussion.
- Whether there is any actual, potential or perceived conflict of interest requiring reassignment of the matter.

7. Investigation process

The Training Manager or delegated investigator will investigate the complaint or appeal in a manner proportionate to the seriousness and complexity of the matter.

The investigation may include:

- Reviewing enrolment, assessment, attendance, correspondence or other relevant records.
- Interviewing the complainant, appellant, respondent and relevant witnesses.
- Requesting written statements or additional documents.
- Seeking expert input or independent advice where appropriate.
- Convening a meeting between the parties, where suitable and safe to do so.

All decisions must be based solely on relevant evidence gathered through the investigation.

8. Assessment Appeals

Where an appeal relates to an assessment decision, SCRT will review the assessment process, the evidence collected, the assessment tools used, mapping, instructions provided, and the basis on which the original judgement was made.

Where practicable, an assessment appeal will be reviewed by a suitably qualified person who was not involved in the original decision and who can provide an impartial review.

Where the appeal is upheld, SCRT will implement an appropriate remedy, which may include reassessment, adjustment of the result, additional evidence collection, or another fair corrective action.

9. Natural justice and procedural fairness

SCRT will ensure that all parties are treated fairly during the complaint or appeal process.

This includes, as relevant:

- Informing a person of the substance of allegations or concerns affecting them.
- Giving parties a reasonable opportunity to respond to relevant information.
- Ensuring decision-makers are impartial and free from bias or conflict of interest.
- Making decisions on relevant evidence.
- Providing written reasons for the outcome where appropriate.

10. Timeframes

SCRT aims to resolve formal complaints and appeals as quickly as practicable and, where possible, within thirty (30) calendar days of receipt.

Where a matter is particularly complex, involves multiple parties, requires external input or cannot reasonably be finalised within thirty (30) calendar days, SCRT will inform the complainant or appellant in writing of:

- The reason for the delay.
- The expected revised timeframe.
- Any interim actions or updates relevant to the matter.
- SCRT will provide regular progress updates until the matter is finalised.

11. Outcome of complaint or appeal

At the conclusion of the process, SCRT will provide the complainant or appellant with a written outcome within seven (7) days of the decision being made.

The written outcome will, where appropriate, include:

- The decision reached.
- The reasons for the decision.
- Any corrective action, preventive action or remedy to be implemented.
- The person responsible for implementing actions.
- Any further internal review or external options available to the person.

12. External review or referral

SCRT encourages complainants and appellants to first use its internal complaints and appeals process unless doing so would unreasonably disadvantage them.

Where a person remains dissatisfied after SCRT's internal process has concluded, or where the matter is otherwise suitable for external review, SCRT may advise the person of available external options relevant to the nature of the issue.

Depending on the issue, external avenues may include:

- Australian Skills Quality Authority (ASQA), for concerns relevant to an RTO's compliance with the Standards for RTOs and related obligations.
- Fair Work Ombudsman, for workplace relations matters relevant to employment issues.
- Another appropriate regulator, ombudsman, mediator or government agency, depending on the circumstances of the complaint or appeal.

SCRT will provide accurate contact details or referral information where external escalation is appropriate.

13. Mediation and independent review

If a matter cannot be resolved internally, or if SCRT considers it appropriate, SCRT may arrange mediation or independent review by a mutually agreed third party, subject to the nature of the matter and any legal or contractual obligations.

The purpose of mediation or independent review is to support impartial resolution while maintaining procedural fairness and appropriate confidentiality.

14. Confidentiality and records

SCRT will securely maintain records of all complaints and appeals, including correspondence, interview notes, evidence, investigation findings, outcome letters, actions taken and closure status.

Records will be stored securely and accessed only by authorised personnel, except where disclosure is required by law, regulation, contractual obligation or a legitimate safety requirement.

15. Corrective action and continuous improvement

SCRT will review complaints and appeals information to identify trends, recurring issues, systemic weaknesses, staff development needs or opportunities for service improvement.

Where appropriate, SCRT will implement corrective action and preventive action, such as changes to training materials, assessment tools, policies, procedures, communication practices, staff training or oversight arrangements.

Serious matters or recurring issues will be escalated through SCRT's management and continuous improvement processes for monitoring and follow-up.

16. Rail industry and safety-critical matters

Where a complaint or appeal involves rail safety, site access, safety-critical competencies, network rules, or contractual obligations with rail industry clients or infrastructure managers, SCRT will manage the matter with appropriate regard to safety, compliance and operational risk.

Where required and lawful, SCRT may consult with relevant client representatives, site authorities or other authorised parties to ensure the outcome does not compromise safety or regulatory obligations.

Related documents

Complaints Appeals Office Form Document 52(a).[cite:10]
Complaints Appeals Public Form Document 52(b).[cite:10]
Student Information Handbook
Complaints and Appeals Register.
Continuous Improvement Register.
Records Management Procedure.