

LEARNING - POLICIES & PROCEDURES

Policy Title	Complaints & Appeals Policy & Procedure
Date	May 2026
Review Date	May 2028
Authority & Responsibility	Head of Learning
Standards	Standards for RTOs 2025 - Outcome Standards 2.7 and 2.8; relevant Compliance Requirements for transparent information, records and continuous improvement
Version	4.0

PURPOSE:

The purpose of this policy and procedure is to outline ASFA Learning's approach to receiving, managing and resolving feedback, complaints and appeals relating to its Registered Training Organisation (RTO) operations. It provides a transparent, fair and confidential process for students, clients, staff and other members of the community to raise concerns and seek review of decisions.

This policy supports ASFA to meet the requirements of the Standards for RTOs 2025, particularly Outcome Standards 2.7 and 2.8, which relate to feedback, complaints, appeals, procedural fairness and continuous improvement.

SCOPE:

This policy applies to complaints and appeals made by prospective students, current students, former students, clients, staff, employers, third parties and members of the community in relation to ASFA Learning's RTO operations. This includes matters relating to:

- the RTO, including its policies, procedures, marketing, enrolment, training, assessment, support services, certification documentation or administrative processes
- trainers, assessors, presenters, contractors or other ASFA staff involved in RTO services
- third parties providing services on behalf of ASFA
- students or clients of ASFA
- decisions made by ASFA that may affect a student or client.

POLICY:

1. Nature of complaints and appeals

For the purposes of this policy:

- A complaint is an expression of dissatisfaction about ASFA Learning, its RTO services, staff, students, third parties, products or the complaints handling process itself, where a response or resolution is explicitly or implicitly expected.
- An appeal is a request for ASFA to review a decision it has made. Appeals may relate to assessment outcomes, enrolment decisions, support decisions, reasonable adjustment decisions, refund decisions, academic misconduct

outcomes, complaint outcomes, withdrawal, extension or deferral decisions, or other decisions made by ASFA.

Complaints may relate to any aspect of ASFA Learning services, including but not limited to marketing information, enrolment, fees and refunds, student support, learning systems, training and assessment quality, assessment requirements, conduct of staff or students, discrimination, harassment, bullying, privacy or access to services.

2. Principles of complaints and appeals management

ASFA is committed to a complaints and appeals process that:

- is accessible, free of charge and clearly communicated to students and clients
- is fair, transparent, objective, timely and confidential
- affords all relevant parties procedural fairness and natural justice
- is managed by an appropriate person who is impartial and, where possible, was not involved in the original matter or decision
- allows relevant parties to provide information, evidence or a response before a decision is made
- is based on relevant and sufficient evidence
- provides written outcomes with reasons for the decision
- maintains student enrolment while a complaint or appeal is being handled, unless there is a serious risk to health, safety, wellbeing or the integrity of assessment
- provides an avenue for independent review where the matter cannot be resolved internally
- uses complaints, appeals and feedback to identify risks, prevent recurrence and support continuous improvement.

3. Timeframes

- ASFA will acknowledge complaints and appeals in writing within 5 business days of receipt.
- ASFA will aim to finalise complaints and appeals as soon as practicable and generally within 30 calendar days of receipt, unless the matter is complex or further information is required.
- Where a complaint or appeal cannot be finalised within 30 calendar days, ASFA will advise the complainant or appellant in writing of the reasons for the delay and provide regular progress updates, normally at least weekly, until the matter is resolved.
- ASFA may request additional information from the complainant, appellant or other relevant parties where required to investigate and resolve the matter fairly.

4. Procedural fairness and confidentiality

- All parties directly involved in a complaint or appeal will be informed of the relevant allegations or issues, unless there is a lawful or safety-related reason not to do so.
- Relevant parties will be given a reasonable opportunity to respond to the issues before a decision is made.
- Information relating to complaints and appeals will be handled confidentially and shared only with people who need the information to investigate, respond to, resolve or record the matter.
- Personal information will be managed in accordance with ASFA's Privacy Policy and Procedure.

5. Assessment appeals

- Students may appeal an assessment outcome where they believe the assessment decision was not fair, valid, reliable or consistent with the assessment requirements.
- Assessment appeals will be reviewed by an appropriately qualified assessor who was not involved in the original assessment decision, wherever practicable.

- The reviewing assessor will consider the original assessment evidence, the assessment requirements and any relevant information provided by the student. The outcome of the review will be documented and communicated to the student in writing.

6. Independent review

- Where the internal complaints and appeals process does not resolve the matter, the complainant or appellant may request that the matter be reviewed by an appropriate independent party.
- ASFA may also appoint an independent party where the matter is complex, sensitive, or where independence is required to ensure procedural fairness.
- Costs associated with an independent review will be advised before the review commences. Where ASFA initiates the independent review, ASFA will normally meet the cost. Where the complainant or appellant requests an independent review, ASFA may require the complainant or appellant to meet the cost, unless otherwise agreed.
- ASFA will cooperate with any independent review and will consider any recommendations made. Where recommendations are accepted, ASFA will implement them within a reasonable timeframe and record the actions taken.

7. External complaint avenues

This policy does not limit a person's right to access external complaint, review or legal avenues, including rights under consumer protection legislation. External avenues may include:

- National Training Complaints Hotline
- Australian Skills Quality Authority (ASQA), where the complaint relates to ASFA's compliance with RTO obligations
- relevant consumer protection, privacy, anti-discrimination or workplace authorities, depending on the nature of the matter.

8. Records and continuous improvement

- ASFA will maintain a Complaints and Appeals Register recording each complaint or appeal, key dates, parties involved, summary of the matter, actions taken, outcome, reasons for the outcome and any improvement actions identified.
- Complaint and appeal records will be securely stored and retained in accordance with ASFA's records management and privacy requirements.
- Complaints and appeals will be reviewed by the Head of Learning to identify systemic issues, risks, non-compliances or opportunities for improvement.
- Improvement actions will be recorded in the Continuous Improvement Register and monitored through ASFA's RTO governance arrangements.

9. Publication

This policy and procedure will be made available to students and clients, including through the ASFA website and Student Handbook.

PROCEDURE:

1. Making a complaint or appeal

- A complaint or appeal may be made by email to learning@superannuation.asn.au, by phone, in person, or by letter.
- Students and clients should be encouraged to provide enough information to allow ASFA to understand and investigate the matter, including relevant dates, people involved, supporting evidence and the outcome sought.
- Where a complaint or appeal is made verbally, ASFA staff should record the key details and confirm the matter in writing with the complainant or appellant where appropriate.

2. Acknowledgement and recording

- Acknowledge receipt of the complaint or appeal in writing within 5 business days.
- Record the matter in the Complaints and Appeals Register.
- Identify whether the matter is a complaint, appeal, assessment appeal, feedback item, incident, privacy matter or another type of issue requiring referral under another ASFA policy.
- Where urgent risk, safety, wellbeing or legal issues are identified, escalate immediately to the Head of Learning and/or appropriate ASFA senior manager.

3. Initial review and allocation

- The Head of Learning, or another appropriately delegated person, will conduct an initial review of the matter.
- Where the complaint or appeal involves the Head of Learning, the matter will be referred to the CEO or another impartial senior staff member.
- Determine the people who need to be involved, the evidence required, the expected timeframe for resolution and whether any interim action is needed.
- Where the complaint or appeal involves a third party delivering services on behalf of ASFA, involve that third party as appropriate while ensuring ASFA retains responsibility for managing the matter.

4. Investigation and review

- Collect and review relevant information, which may include enrolment records, assessment records, emails, learning system records, attendance records, payment records, policy documents, communications and statements from relevant parties.
- Provide relevant parties with an opportunity to respond to allegations or issues that affect them.
- For an assessment appeal, arrange for an independent assessor to review the original assessment evidence and assessment decision wherever practicable.
- Assess the matter objectively against ASFA policies, course information, regulatory requirements, contractual arrangements and the evidence available.
- Document the investigation steps and evidence considered.

5. Decision and response

- Determine the outcome and any required action. Where appropriate, the matter may be referred to the ASFA Leadership Team or CEO for input or approval.
- Provide the complainant or appellant with a written response outlining ASFA's understanding of the matter, the steps taken to review or investigate it, the decision reached, reasons for the decision, any action to be taken, any improvement actions identified, and options for further review if they are dissatisfied with the outcome.
- Where another party is affected by the outcome, provide appropriate information to that party while maintaining confidentiality and privacy.

6. Independent review, where required

- If the matter is not resolved internally and an independent review is requested or considered necessary, identify an appropriate independent party with relevant expertise and no conflict of interest.
- Confirm the scope, process, timeframe and costs of the independent review in writing before it commences.
- Cooperate with the independent party and provide relevant information as required.
- Record the outcome and any recommendations. Where recommendations are accepted, record and monitor implementation actions.

7. Finalisation and records

- Update the Complaints and Appeals Register with the outcome, date finalised, reasons for decision and any required follow-up actions.
- Save copies of relevant correspondence, evidence, investigation notes and outcome letters in the appropriate secure record location.
- Update the Continuous Improvement Register where the matter identifies a systemic issue, risk, non-compliance or opportunity for improvement.
- Monitor any agreed corrective or improvement actions through ASFA's RTO governance and continuous improvement processes.

VERSION CONTROL:

Version	Date	Approved by	Summary of changes
4.0	15/05/2026	Head of Learning	Updated to align with the Standards for RTOs 2025.