

ORG01 GRIEVANCES POLICY AND PROCEDURE

Department	Student Services
Approval Authority	Board of Directors
Responsible Officer	CEO
Effective Date for use	1 October 2026
Date of next review	August 2029 (3 years from approval date)

1. Purpose

The purpose of this Policy and Procedure is to establish the principles, responsibilities, and processes for managing complaints, grievances, and appeals at TITAN HIGHER EDUCATION (TITAN/THE).

TITAN is committed to providing accessible, transparent, fair, and timely mechanisms for students and staff to raise concerns and seek review of decisions that affect their studies or student experience. This Policy and Procedure ensures that all complaints, grievances, and appeals are handled consistently, impartially, and in accordance with the principles of procedural fairness, natural justice, and continuous improvement.

This Policy and Procedure supports TITAN's compliance with the *Higher Education Standards Framework (Threshold Standards) 2021, as amended, the Education Services for Overseas Students Act 2000 (ESOS Act), and the National Code of Practice for Providers of Education and Training to Overseas Students 2018*, where applicable, as well as other relevant legislative and regulatory obligations.

Effective management of complaints, grievances, and appeals enhances student confidence, institutional accountability, quality assurance, and the continuous improvement of learning, teaching, and student support services.

2. Scope

2.1 This Policy and Procedure applies to:

- all current students;
- prospective students and applicants;
- former students where the matter relates to issues arising during their enrolment;
- graduates where the matter relates to their period of enrolment;
- all academic and professional staff;
- contractors, consultants, education agents and third-party providers acting on behalf of TITAN; and
- members of committees or other persons involved in the investigation or determination of complaints, grievances or appeals.

2.2 Where a grievance, complaint or appeal is made by a staff member in relation to employment, workplace conduct, performance management, disciplinary matters or other employment-related issues, the matter will be managed under the relevant staff policy, employment agreement or human resources procedure. The procedures contained in this document primarily govern student complaints, grievances and appeals.

- 2.3 This Policy and Procedure applies to complaints, grievances and appeals relating to academic and non-academic matters, including but not limited to:
- admissions and selection;
 - enrolment and student administration;
 - assessment and academic decisions where no other specific review process applies;
 - academic support and supervision;
 - academic progress;
 - student services;
 - learning resources and facilities;
 - placements and work-integrated learning;
 - staff conduct;
 - discrimination, bullying or harassment (except where managed under specialist policies);
 - administrative decisions;
 - fees and refunds;
 - privacy and confidentiality;
 - conduct or actions of education agents (where applicable); and
 - any other matter affecting a student's educational experience.
- 2.4 This Policy and Procedure does not apply to matters of academic judgement, including decisions regarding academic merit, academic standards, grades or assessment outcomes reached through the proper exercise of academic judgement.
- 2.5 This Policy and Procedure may apply where a student alleges:
- procedural error;
 - failure to apply policy or procedure;
 - bias or conflict of interest;
 - failure to consider relevant evidence; or
 - administrative error.
- 2.6 Matters relating to assessment and academic progress are also governed by the **Assessment Policy and Procedure** and **Academic Progress Policy and Procedure**.
- 2.7 This Policy and Procedure does not replace specialist complaint or appeal processes established under other TITAN policies. Where a matter is specifically addressed by another policy or procedure, that document takes precedence.
- 2.8 Nothing in this Policy and Procedure limits a student's rights under Australian law, including the *Australian Consumer Law*, or their right to seek external review through an appropriate independent body once internal processes have been exhausted.

3. Policy Principles

TITAN is committed to managing complaints, grievances and appeals in accordance with the following principles.

- 3.1 Accessibility
- 3.1.1 TITAN will provide accessible, clearly documented and well-publicised processes that enable students to raise concerns without fear of disadvantage.
- 3.1.2 Information about complaint, grievance and appeal processes will be readily available, easy to understand and provided at no cost for internal resolution.
- 3.1.3 Students may be accompanied by a support person at any formal stage of the process.
- 3.2 Procedural Fairness
- 3.2.1 All complaints, grievances and appeals will be managed fairly, objectively and impartially.
- 3.2.2 Decision-makers will:
- act independently;

- declare and appropriately manage any actual, perceived or potential conflict of interest;
 - consider all relevant evidence;
 - provide all parties with an opportunity to respond;
 - make decisions based solely on the available evidence; and
 - provide written reasons for decisions.
- 3.2.3 No person involved in making the original decision will determine an appeal relating to that decision.
- 3.3 Timeliness
- 3.3.1 Complaints, grievances and appeals will be managed as promptly as practicable.
- 3.3.2 Where delays occur, TITAN will keep all parties informed of progress and the reasons for the delay.
- 3.4 Confidentiality
- 3.4.1 All complaints, grievances and appeals will be handled confidentially.
- 3.4.2 Information will only be disclosed where necessary to investigate or resolve the matter, to implement an outcome, or where required by law.
- 3.4.3 Records will be managed in accordance with the ***Privacy Policy and Procedure***, and ***Records and Data Management Policy and Procedure***.
- 3.5 Respect and Professional Conduct
- 3.5.1 All participants are expected to act respectfully, honestly and cooperatively throughout the complaint, grievance and appeal process.
- 3.5.2 TITAN expects staff and students to cooperate fully with investigations while maintaining appropriate standards of professional conduct.
- 3.6 Protection from Victimisation
- 3.6.1 No student or staff member will be disadvantaged, victimised or subject to retaliation for making, supporting or participating in a complaint, grievance or appeal honestly and without malicious intent.
- 3.6.2 Allegations of victimisation may constitute misconduct and will be managed under the appropriate TITAN policy and procedure.
- 3.7 Continuous Improvement
- 3.7.1 TITAN recognises complaints, grievances and appeals as valuable sources of institutional feedback.
- 3.7.2 Complaint and appeal data will be analysed to identify:
- emerging risks;
 - systemic issues;
 - opportunities for service improvement;
 - policy enhancements;
 - staff development needs; and
 - improvements to the student experience.
- 3.7.3 De-identified reports will be provided to senior management and the Academic Board to support institutional quality assurance.

4. Policy Statements

TITAN will:

- 4.1 Accessibility and Equity
Provide complaint, grievance and appeal processes that are accessible, transparent, fair and equitable for all students.
- 4.2 Early Resolution
Encourage the timely and informal resolution of concerns wherever appropriate and practicable.
- 4.3 Fair Investigation
Ensure formal complaints, grievances and appeals are managed and investigated impartially, consistently and without undue delay.
- 4.4 Decision Transparency
Provide students with clear, timely written reasons for decisions and outcomes.
- 4.5 Review Options
Inform students of available internal and external review, appeal and complaint avenues.
- 4.6 Record Management
Maintain accurate, secure and confidential records of complaints, grievances, appeals, decisions and outcomes in accordance with legislative and organisational requirements.
- 4.7 Implementation of Outcomes
Implement decisions, recommendations and agreed actions arising from complaint, grievance and appeal processes in a timely manner.
- 4.8 Monitoring and Continuous Improvement
Monitor and analyse complaint, grievance and appeal data and trends to support quality assurance, risk management and continuous improvement.
- 4.9 No-Cost Internal Review
Ensure that internal complaint, grievance and appeal processes are available to students at no cost.
- 4.10 Policy Review and Compliance
Regularly review this Policy and Procedure to ensure ongoing effectiveness and compliance with applicable legislative, regulatory and accreditation requirements.

5. Natural Justice and Procedural Fairness

TITAN is committed to ensuring that all complaints, grievances and appeals are managed in accordance with the principles of natural justice and procedural fairness.

- 5.1 Accordingly, TITAN will ensure that
 - 5.1.1 Respect and Equity
All parties are treated respectfully, equitably and without bias throughout the process.
 - 5.1.2 Right to Be Informed
Complainants and respondents are informed of the nature of the complaint or appeal, including any allegations relevant to the matter.
 - 5.1.3 Right to Respond
Each party is provided with a reasonable opportunity to present evidence, respond to information relevant to the matter, and make submissions before a decision is made.

- 5.1.4 Independence and Conflict Management
Decision-makers are independent of the original decision under review and declare any actual, perceived or potential conflict of interest prior to participating in the process.
- 5.1.5 Objective Investigation
Investigations are conducted objectively and based on relevant, reliable and sufficient evidence.
- 5.1.6 Evidence-Based Decisions
Decisions are made on the balance of probabilities and supported by documented evidence.
- 5.1.7 Transparent Outcomes
All parties are advised in writing of the outcome, including the reasons for the decision and any available internal or external review rights.
- 5.1.8 Support Person
All parties may be accompanied by a support person during formal meetings or interviews.
- 5.1.9 Timeliness with Fairness
Complaint and appeal processes are completed as promptly as practicable while ensuring procedural fairness is maintained.

6. Confidentiality and Privacy

TITAN recognises that complaints, grievances and appeals frequently involve sensitive personal information.

- 6.1 Accordingly, TITAN will ensure that:
 - 6.1.1 Confidential Handling
All information relating to complaints, grievances and appeals is treated confidentially.
 - 6.1.2 Restricted Access
Access to complaint records is limited to staff who have a legitimate need to know in order to perform their duties.
 - 6.1.3 Controlled Disclosure
Information is only disclosed where necessary to investigate or resolve the matter, to implement an outcome, or where required or authorised by law.
 - 6.1.4 Privacy Compliance
Complaint records are managed in accordance with the *Privacy Act 1988 (Cth)*, applicable privacy legislation and TITAN's **Privacy Policy and Procedure**.
 - 6.1.5 Participant Responsibility
All participants are expected to maintain confidentiality throughout the process.
- 6.2 Nothing in this Policy and Procedure prevents TITAN from disclosing information where there is a serious risk to the health, safety or wellbeing of any person, or where disclosure is otherwise required or authorised by law.

7. Protection from Victimisation

TITAN is committed to ensuring that students and staff can raise genuine concerns without fear of adverse consequences.

7.1 Accordingly, any person who:

- makes a complaint honestly and without malicious intent;
- assists another person to make a complaint;
- participates in an investigation; or
- provides evidence during a complaint, grievance or appeal process.

7.2 Must not be subjected to intimidation, harassment, discrimination, victimisation or any other form of adverse treatment because of their participation.

7.3 Allegations of victimisation may constitute misconduct and will be managed under the relevant TITAN policies and procedures.

7.4 Nothing in this section protects complaints or allegations that are knowingly false, misleading, malicious or intentionally vexatious.

7.5 A complaint, grievance or appeal that is not upheld, substantiated or successful will not, of itself, be regarded as malicious, vexatious or made in bad faith.

8. Recordkeeping and Continuous Improvement

TITAN will maintain secure and accurate records of all complaints, grievances and appeals.

8.1 Records will include, where applicable:

- the nature of the complaint, grievance or appeal;
- correspondence exchanged with parties;
- evidence considered;
- investigation activities undertaken;
- decisions made;
- reasons for decisions;
- actions taken to implement outcomes;
- appeal outcomes; and
- improvement actions arising from the matter.

8.2 Records will be retained in accordance with the ***Records and Data Management Policy and Procedure*** and all applicable legislative requirements.

8.3 De-identified complaint and appeal data will be analysed regularly to identify:

- recurring issues;
- systemic risks;
- opportunities for policy or procedural improvement;
- staff development needs;
- service enhancement opportunities; and
- institutional risks requiring management attention.

8.4 De-identified complaints, grievances and appeals reports will be provided to Executive Management at least quarterly and to the Academic Board and Board of Directors at least every six (6) months to support governance, quality assurance and continuous improvement.

9. Procedures

9.1 Procedure Principles

- 9.1.1 These Procedures establish the operational framework for managing student grievances, complaints and appeals.
- 9.1.2 Staff grievances will normally be managed in accordance with relevant employment policies and procedures unless otherwise determined by the Chief Executive Officer.
- 9.1.3 TITAN will ensure that all complaints, grievances and appeals are managed in a manner that is:
- **Accessible:** Clear, easy to understand and available to all students.
 - **Free of Charge:** No cost to students during internal review stages.
 - **Fair and Impartial:** Managed objectively, transparently and without bias.
 - **Timely:** Proportionate to the nature and complexity of the matter.
 - **Confidential:** Information shared only on a need-to-know basis.
 - **Respectful:** All parties treated with courtesy and professionalism.
 - **Consistent:** Processes applied uniformly across the institution.
 - **Compliant:** Aligned with legislative and regulatory requirements.
 - **Resolution-Focused:** Aimed at achieving appropriate and timely outcomes.
- 9.1.4 Students may withdraw a grievance, complaint or appeal at any stage by providing written notification to TITAN.
- 9.1.5 Where a matter raises concerns regarding the health, safety or wellbeing of any individual, TITAN may continue an investigation where necessary to meet its legal obligations, notwithstanding withdrawal of the grievance or complaint.

9.2 Academic and Non-Academic Matters

Students may lodge grievances regarding academic and non-academic matters.

9.2.1 Academic Matters

- Academic grievances may include, but are not limited to:
 - teaching quality;
 - learning resources;
 - academic supervision;
 - feedback on learning activities;
 - delivery of units or courses;
 - access to academic support;
 - learning technologies;
 - research supervision (where applicable);
 - academic services;
 - academic decisions that are not matters of academic judgement and where no other specialist review process applies.
- Where a grievance relates specifically to assessment, academic integrity, recognition of prior learning or academic progress, the relevant specialist policy and procedure will normally apply.

9.2.2 Non-Academic Matters

- Non-academic grievances may include:

- admissions;
- enrolment;
- fees and refunds;
- student administration;
- student support services;
- disability support;
- wellbeing services;
- facilities;
- information technology services;
- placement administration;
- privacy;
- staff conduct;
- customer service;
- education agents;
- contractors acting on behalf of TITAN;
- any other aspect of the student experience.

9.3 Timeframes

- 9.3.1 Students are expected to lodge grievances within three (3) months of the event giving rise to the matter.
- 9.3.2 Grievances submitted outside this period may be accepted where:
- exceptional circumstances exist;
 - the delay was beyond the student's reasonable control;
 - new evidence has become available; or
 - TITAN determines acceptance is appropriate in the interests of fairness.
- 9.3.3 Where a grievance cannot reasonably be completed within published timeframes, TITAN will advise the student in writing of:
- the reasons for the delay;
 - the expected completion date;
 - the progress of the investigation.

9.4 Stage One

Informal Resolution

- 9.4.1 TITAN encourages concerns to be resolved informally wherever appropriate.
- 9.4.2 Students are encouraged to raise concerns directly with the staff member or organisational area responsible for the matter.
- 9.4.3 This may include:
- lecturer;
 - tutor;
 - Course Coordinator;
 - Student Services;
 - Library;
 - Information Technology;
 - Placement Coordinator;
 - Head of Higher Education; or
 - another relevant manager.

9.4.4 The staff member should:

- listen respectfully;
- clarify the issues;
- seek to resolve the concern promptly;
- explain relevant policies;
- maintain confidentiality; and
- document significant discussions where appropriate.

9.4.5 Informal grievances or complaints should normally be acknowledged within **five (5) working days** and resolved wherever possible within **ten (10) working days**.

9.4.6 Where informal resolution is unsuccessful or inappropriate, the student may lodge a formal complaint.

9.5 Stage Two

Formal Grievance or Complaint

9.5.1 Students may lodge a formal grievance or complaint where:

- informal resolution has not resolved the matter;
- the matter is sufficiently serious to warrant formal investigation;
- there is an allegation of misconduct;
- the student is uncomfortable pursuing informal resolution; or
- legislation or another TITAN policy requires formal consideration.

9.5.2 Grievances or complaints must normally be submitted using the approved ***Student Grievance or Complaint Form*** and include:

- student details;
- description of the complaint;
- relevant dates;
- supporting evidence;
- previous actions taken; and
- desired outcome.

9.5.3 Anonymous grievances or complaints may be accepted where sufficient information exists to investigate the matter.

9.5.4 Acknowledgement

- TITAN will acknowledge receipt of the grievance or complaint within **five (5) working days**.
- The acknowledgement will include:
 - confirmation that the grievance or complaint has been received;
 - the responsible officer;
 - expected timeframes;
 - requests for additional information (if required); and
 - advice regarding available support services.

Investigation Process

9.5.5 TITAN may appoint either an internal or external investigator where necessary to ensure independence, subject matter expertise or procedural fairness.

9.5.6 The investigator may:

- review documents;
- obtain written submissions;
- interview relevant persons;
- request additional evidence;
- seek expert advice where appropriate;
- inspect relevant records;
- consult other TITAN staff; and
- recommend appropriate outcomes.

9.5.7 Investigations will be conducted in accordance with the principles of procedural fairness.

9.5.8 Respondents will:

- be advised of the allegations;
- receive an opportunity to respond;
- be permitted to provide evidence; and
- be advised of their right to a support person.

9.5.9 Students may also be accompanied by a support person during any formal meeting.

9.5.10 Investigations should normally be completed within **twenty (20) working days**.

Grievance or Complaint Outcomes

9.5.11 Following investigation, TITAN will determine an appropriate outcome based upon the available evidence.

9.5.12 Outcomes may include:

- explanation or clarification;
- apology;
- correction of records;
- review of administrative processes;
- reassessment where permitted under relevant policies;
- mediation;
- counselling;
- additional student support;
- staff training;
- policy or procedural amendment;
- service improvement;
- referral under another TITAN policies and procedures;
- disciplinary action; or
- no further action.

9.5.13 Prior to release of any formal investigation outcome, the responsible officer will ensure the findings adequately address all issues raised and are supported by appropriate evidence.

9.5.14 Students will receive written notification including:

- findings;
- reasons;
- actions taken;
- recommendations;
- review rights; and
- implementation arrangements where applicable.

9.6 Stage Three

Internal Appeal

- 9.6.1 Where an appeal relates to a decision affecting enrolment status, TITAN will maintain the student's enrolment and access to study during the appeal process unless the student's health, safety or wellbeing, or that of others, is at risk.
- 9.6.2 Students may appeal a grievance or complaint outcome where they believe one or more of the following grounds apply:
- procedural fairness or natural justice was not followed;
 - there was a procedural irregularity or administrative error in the handling of the matter;
 - relevant evidence was not considered, or irrelevant evidence was relied upon;
 - new, relevant and material evidence has become available that was not reasonably available at the time the original decision was made;
 - mitigating circumstances existed and were not appropriately considered;
 - the decision-maker demonstrated actual, perceived or potential bias or had an undisclosed conflict of interest;
 - the decision was unreasonable, disproportionate or unsupported by the available evidence;
 - a TITAN policy, procedure, rule or regulatory requirement was incorrectly applied or interpreted; or
 - the decision was otherwise inconsistent with the evidence presented or the requirements of this Policy and Procedure.
- 9.6.3 Appeals must:
- identify the applicable ground(s) for appeal;
 - provide supporting evidence;
 - explain why the original decision should be reviewed; and
 - specify the outcome sought.
- 9.6.4 Appeals will normally be acknowledged within **five (5) working days** and determined within **twenty (20) working days** unless the complexity of the matter requires additional time.
- 9.6.5 Where an appeal cannot reasonably be completed within the published timeframe, TITAN will advise the appellant in writing of:
- the reasons for the delay;
 - progress of the review; and
 - the revised expected completion date
- 9.6.6 Appeals will be determined by a person or committee independent of the original decision-maker.
- 9.6.7 Students will receive a written decision including reasons and advice regarding external review options.

9.7 Stage Four

External Review

- 9.7.1 Where internal processes have been exhausted, students will be advised of appropriate external review options relevant to the nature of their grievance or complaint.
- 9.7.2 These may include independent mediation, statutory review bodies, ombudsman services, regulatory agencies or other external organisations with appropriate jurisdiction.

- 9.7.3 International students will be advised of any rights available under the *ESOS legislative framework*.
- 9.7.4 Where an external review recommends corrective action, TITAN will consider the recommendations promptly and advise the student of any actions to be implemented.
- 9.7.5 Depending upon the nature of the complaint, grievance or appeal, students may seek review from appropriate external agencies including Ombudsman services, regulatory authorities, independent mediation providers, consumer protection agencies or other bodies with relevant jurisdiction.
- 9.7.6 TITAN will provide reasonable assistance to students seeking information regarding appropriate external review options.
 - Examples may include:
 - National Student Ombudsman;
 - Overseas Students Ombudsman;
 - TEQSA;
 - Australian Human Rights Commission; and
 - other agencies with relevant jurisdiction.

9.8 Support Persons

- 9.8.1 Students and respondents may be accompanied by a support person at any formal meeting.
- 9.8.2 The support person may:
 - provide emotional or practical support;
 - assist with communication where appropriate; and
 - take notes during meetings.
- 9.8.3 The support person will not normally advocate on behalf of the student unless permitted by TITAN.

9.9 Anonymous, Frivolous and Vexatious Grievances or Complaints

- 9.9.1 Anonymous complaints may be investigated where sufficient information exists. Where insufficient information is available, TITAN may be unable to undertake a full investigation.
- 9.9.2 TITAN may decline to investigate grievances or complaints that are:
 - frivolous;
 - vexatious;
 - malicious;
 - lacking sufficient information; or
 - previously determined without new evidence.
- 9.9.3 Knowingly false or malicious grievances or complaints may constitute misconduct under the ***Student Code of Conduct*** or relevant staff policies and procedures.

9.10 Conflict of Interest

- 9.10.1 Any person involved in investigating or determining a grievance, complaint or appeal must disclose any actual, perceived or potential conflict of interest.
- 9.10.2 Where a conflict exists, another suitably qualified person will be appointed.

9.11 Records Management

9.11.1 TITAN will maintain secure records of:

- grievances or complaints;
- investigations;
- evidence;
- correspondence;
- decisions;
- appeals;
- corrective actions; and
- improvement initiatives.

9.11.2 TITAN will maintain a ***Complaints, Grievances and Appeals Register*** recording complaints, grievances, appeals, outcomes, corrective actions and trend data.

- The Register will record, where applicable:
 - date received;
 - date closed;
 - complaint category;
 - grievance category;
 - outcome;
 - corrective actions;
 - escalation status; and
 - improvement actions.

9.11.3 Records will be managed in accordance with legislative requirements and the ***Records and Data Management Policy and Procedure***.

9.12 Monitoring and Continuous Improvement

9.12.1 The Student Services Manager will maintain a central register of complaints, grievances and appeals.

9.12.2 De-identified grievance or complaint data will be analysed periodically to identify:

- recurring issues;
- emerging risks;
- opportunities for service enhancement;
- policy improvements;
- staff development requirements; and
- institutional risks.

9.12.3 Summary of de-identified complaints, grievances and appeals reports will be provided to the Senior Management Team at least quarterly and to the Academic Board and Board of Directors at least every six (6) months.

10. Roles and Responsibilities

10.1 Board of Directors are responsible for:

- endorsing and overseeing this Policy and Procedure;
- ensuring the Policy and Procedure aligns with legislative and regulatory requirements;
- monitoring institutional performance in grievance management; and
- receiving and reviewing de-identified complaints, grievances and appeals reports at least every six (6) months, including trends, outcomes, systemic issues and improvement actions.

10.2 Chief Executive Officer is responsible for:

- ensuring effective implementation of this Policy and Procedure;
- allocating adequate resources to support fair and timely grievance resolution;
- ensuring staff are trained in grievance handling and procedural fairness;
- reviewing serious or systemic matters escalated through grievance processes; and reporting significant issues to the Board of Directors, and Academic Board.

10.3 Academic Board is responsible for:

- monitoring academic grievances and appeals to ensure academic integrity and fairness;
- reviewing de-identified complaints, grievances and appeals reports at least every six (6) months to identify trends, systemic issues, emerging risks and opportunities for improvement;
- recommending policy or procedural amendments where required; and
- ensuring academic staff are aware of and comply with grievance procedures.

10.4 Academic Dean / Manager is responsible for:

- overseeing the management of academic grievances and appeals to ensure procedural fairness and academic integrity;
- ensuring academic staff understand and comply with this Policy and Procedure;
- providing advice and support to staff and students on academic grievance matters;
- reviewing investigation findings and recommendations relating to academic grievances before final determination;
- ensuring corrective actions and improvements are implemented within academic areas;
- reporting academic grievance trends and outcomes to the Chief Executive Officer, and the Academic Board; and
- promoting a culture of continuous improvement in teaching, learning and academic support.

10.5 The Quality and Assurance Manager is responsible for:

- monitoring the effectiveness of grievance management processes across academic and non-academic areas;
- ensuring that grievance data informs continuous improvement activities and risk management;
- reviewing de-identified grievance reports to identify systemic issues, emerging risks and opportunities for enhancement;
- verifying that corrective actions and recommendations arising from grievances are implemented and evaluated;
- supporting compliance with the *Higher Education Standards Framework (Threshold Standards) 2021, as amended, the ESOS Act 2000* and related regulatory requirements;
- coordinating periodic internal audits of grievance handling and reporting outcomes to Senior Management Team, and relevant Boards; and
- maintaining oversight of policy review cycles to ensure this Policy and Procedure remains current and effective.

10.6 All Staff are responsible for:

- responding to student concerns respectfully and promptly;
- referring matters appropriately when informal resolution is not possible;
- maintaining confidentiality and professionalism; and
- cooperating fully with investigations and implementing outcomes.

10.7 Students are responsible for:

- raising concerns honestly, respectfully and with genuine intent to resolve the matter, and for providing accurate information;
- engaging respectfully with staff and processes;
- cooperating with investigations; and

- using internal processes before seeking external review; however, nothing in this Policy and Procedure limits their rights under law.

11. Definitions

Definitions for key terms are presented in the Glossary of Terms which may be accessed on the TITAN website.

For the purpose of this Policy and Procedure:

- **Appeal**
 - A request for review of a decision made by TITAN, where the student believes the decision was incorrect, unfair, or inconsistent with the policies and procedures.
- **Appellant**
 - The student lodging a formal appeal.
- **Complaint**
 - A formal expression of dissatisfaction made by a student about a decision, service, action or behaviour that affects them.
- **Grievance**
 - A complaint requiring formal investigation due to seriousness, complexity, allegations of misconduct, procedural fairness concerns or significant impact.
- **De-identified Data**
 - Information from which personal identifiers have been removed to protect privacy while enabling analysis for quality improvement.
- **Frivolous or Vexatious Complaint**
 - A complaint made without serious purpose, lacking substance, or intended to cause distress or disruption.
- **Investigator**
 - A staff member or external party appointed by TITAN to examine a grievance or complaint in accordance with procedural fairness.
- **Procedural Fairness (Natural Justice)**
 - The principle that decisions are made impartially, based on evidence, and that all parties have an opportunity to be heard.
- **Resolution**
 - The outcome or action taken to address a grievance, complaint or appeal.
- **Respondent**
 - The person, department or area whose actions, decisions or conduct are the subject of a grievance or complaint.
- **Support Person**
 - An individual chosen by a student or respondent to provide emotional or practical support during formal meetings.
- **Victimisation**
 - Any adverse treatment of a person because they have made, supported or participated in a grievance, complaint or appeal honestly and without malicious intent.

12. Relevant Legislation, Guides, and/or Websites

12.1 Legislation:

- [Education Services for Overseas Students Act 2000](#) (accessed August 2026)
- [Higher Education Standards Framework \(Threshold Standards\) 2021](#) (accessed August 2026)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) (accessed August 2026)
- [Tertiary Education and Quality Standards Agency Act 2011](#) (accessed August 2026)
- [Privacy Act 1988 \(Cth\)](#) (accessed August 2026)
- [Australian Consumer Law \(Schedule 2 of the Competition and Consumer Act 2010\)](#) (accessed August 2026)

12.2 Guides:

- TEQSA Guidance Note: [Grievance and Complaint Handling](#) (accessed August 2026)

13. Related TITAN Documents

- Academic Progress Policy and Procedure
- Admissions Policy and Procedure
- Assessment Policy and Procedure
- Critical Incident Policy and Procedure
- Enrolment Policy and Procedure
- Health, Safety and Wellbeing Policy and Procedure
- Quality Assurance Policy and Procedure
- Records and Data Management Policy and Procedure
- Sexual Harassment and Gender-Based Violence Prevention and Response Policy and Procedure
- Student Academic Integrity Policy and Procedure
- Student Code of Conduct
- Student Disability Policy and Procedure
- Student Diversity and Equity Policy and Procedure
- Student Non-Academic Conduct and Misconduct Policy and Procedure
- Work-Integrated Learning Policy and Procedure

Version Control

Combined Policy and Procedure Version Control		
Version #	Date of Change	Change Summary
2026.1	August 2026 Approved BoD 23.09.2026	Policy and Procedure Documents were combined into one complete document. Layout of the document updated, more information added into each section. Added links to relevant legislation and websites. Document has been recoded and irrelevant information removed.

Original Policy Version Control		
Version #	Date of Change	Change Summary
1.0	13-Feb-20	Draft approved by Board of Directors 21-Feb-20 with name change
1.1	20-Jul-20	Administrative updates
1.2	21-Aug-21	Updates for HESF 2021 compliance
1.3	27-Jan-23	Minor amendment to respond to TEQSA feedback approved by CEO
1.4	29-Jun-23	Minor addition to cl 13 approved by CEO 29-Jun-23 and administrative updates following TEQSA registration

Original Appeals Procedure Version Control		
Version #	Date of Change	Change Summary
1.0	13-Feb-20	Draft approved by Board of Directors 21-Feb-20 including minor amendments (cl. 22) plus administrative updates
1.1	20-Jul-20	Administrative updates
1.2	11-Aug-21	Addition of Schedule Two Flowchart and HESF2021 compliance approved by CEO 11-Aug-2021
1.3	9-Dec-21	Revised for 2021 and administrative updates
1.4	27-Jan-23	Minor amendment to respond to TEQSA feedback approved by CEO
1.5	29-Jun-23	Minor addition of cl 81 approved by CEO 29-Jun-23 and administrative updates following TEQSA registration

Original Complaints and Grievances Procedure Version Control		
Version #	Date of Change	Change Summary
1.0	6-Mar-20	Draft approved by Board of Directors 21-Feb-20 including minor amendments (cl. 17) plus administrative updates
1.1	20-Jul-20	Administrative updates
1.2	11-Aug-21	Addition of Schedule Two Flowchart and HESF2021 compliance approved by CEO 11-Aug-2021
1.3	27-Jan-23	Proposed minor amendment to respond to TEQSA feedback approved by CEO
1.4	29-Jun-23	Minor addition of cl 44 approved by CEO 29-Jun-23 and administrative updates following TEQSA registration

Warning –

- Document uncontrolled when printed! The current version of this document is maintained on the TITAN website.