



GRIEVANCE AND COMPLAINT HANDLING AT AGE

Greg Whateley
Elizabeth Woollacott

V2
January 2025

Table of Contents

INTRODUCTION	3
OVERVIEW OF THE FRAMEWORK.....	5
1. POLICIES AND PROCESSES ARE KNOWN TO STAFF	7
2. FIT FOR PURPOSE AND MEETS STANDARDS	8
3. DELEGATION OF AUTHORITY	11
4. CATERS FOR GRIEVANCES.....	12
5. APPROACH TO SENSITIVE ISSUES.....	13
6. SAFETY AND SUPPORT OF STUDENTS	16
7. INFORMATION ACCURACY, CURRENCY AND LOCATABILITY	18
8. INFORMING STUDENTS.....	19
9. CONTACTS AND ADDITIONAL ADVICE	20
10. DEFINITIONS OF SASH	21
11. COMPLIANCE OF COMPLAINT HANDLING	24
12. REASONABLE TIMEFRAMES	26
13. ANALYSIS AND MONITORING OF COMPLAINTS.....	27
14. SPECIFIED INDEPENDENT THIRD PARTIES	28
15. INDEPENDENT REVIEW	29

Introduction

Grievance and Complaint Handling is a mandated commitment for AGE. What has evolved (by way of continuous improvement/self-assurance) is an appropriate and informed approach that is transparent and benchmarked.

Policies and procedures ensure that *students* (in particular) staff or members of the wider community have the necessary support in place to ensure that their concerns (grievances and/or complaints) are considered and ideally resolved. This paper will discuss the approach that AGE has in place in the context of the *Threshold Standards (2021)* and the *TEQSA Guidance Note (2019)* - acknowledging the *Education Services for Overseas Students Act 2000*, as well as the *Australian Qualifications Framework*.

Standard	Key Considerations
1.1.2	Careful attention to this requirement may obviate grievances arising in this area. Other Standards also attempt to obviate potential sources of dissatisfaction e.g. through clarifying student rights and obligations prior to enrolment
2.4.1	Responsibilities for grievance handling - provider's approach caters for grievances about any aspect of a student's experience, including with agents and related parties
2.4.2-2.4.5	The requirement for providers to have mechanisms to address them, as well as various process requirements for formal complaints relating to - costs; advocacy and support for students; timeliness; confidentiality; fairness and access to an independent third party if needed
3.2.5	Students having access to teaching staff for individual assistance
5.3.5	Students are to be given opportunities to provide feedback on their experience and student feedback should inform a provider's monitoring, review and improvement processes
5.4.1-5.4.2	A genuine attempt to resolve genuine complaints, through consistent and fair application of policies and procedures without retribution. These requirements encompass delivery arrangements with other parties, which are required to be quality assured by the primary registered provider
6.1.4	The governing body is also required to take steps to create an environment in which students are treated equitably, and able to participate in the deliberative and decision-making processes of the provider
6.2.1j	The provider's corporate governing body is required to assure itself that the occurrence and nature of formal complaints are monitored, and action is taken to address underlying causes This should be supported by regular reporting to the governing body, and providers should consider making summary information publicly available
7.2.1	The information must be accurate, relevant and timely
7.2.2f	Information about a provider's grievance resolution process is to be in the public domain (e.g. on the provider's website) and accessible to students. Relevant processes are made explicit to students
7.2.2g	Providers to make available specific information to assist international students studying in Australia

Grievance and Complaint Handling at AGE

7.2.4	Reasonable notice of changes to a provider's operations that may affect students' participation in an intended course(s) of study
7.3.3c	Providers are required to document and record responses to formal complaints

An initial independent review was commissioned (October 2024) to consider each of the elements.

Overview of the Framework

Using a framework reflecting TEQSA¹ guidelines, the following table provides an independent audit of coverage of the **key considerations** of best practice relating to **Grievance and Complaint Handling** and how in turn AGE performs accordingly –

Focus	Identifier	Evidence	Rating
1	Policies and procedures are known to staff responsible for their implementation	AGE has in place a Student Grievance Handling Policy and Procedure in place that is known to ALL staff	✓
2	Policies and procedures are likely to be fit for their purpose and are consistent with the requirements of the standards, particularly Standards 2.4.1-2.4.5.	The Student Grievance Handling Policy and Procedure is fit for purpose and is consistent with the relevant HESF Threshold Standards	✓
3	Delegations of authority for implementation of procedures consistent with the scale and nature of the provider, and evidence that the relevant staff are equipped for their role in administering grievances, including through training.	Delegations are clear and appropriate to the scale, size and nature of AGE. Staff are equipped for their role in the associated processes and are provided with the necessary training and professional development	✓
4	The provider's approach caters for grievances about any aspect of a student's experience, including with agents and related parties	The approach is comprehensive	✓
5	Grievances about particularly sensitive issues (such as assault and sexual harassment) may require more specific approaches	Sensitive issues are catered for	✓
6	Policies and procedures need to focus on the safety and the support of the students involved, and staff should be specifically trained to receive such disclosures. The student decides whether an incident is reported to the police.	Policies and procedures are mindful of student support – staff are appropriately trained – police involvement is a shared decision between student and staff	✓
7	All relevant information required for students to access and participate in grievance processes is accurate, current and easily locatable in the public domain - through a dedicated section of the provider's website	All relevant information required for students to access and participate in grievance processes is accurate, current and easily locatable in the public domain - through a dedicated section of the provider's website	✓
8	Students have been informed about grievance processes and how to access them by mechanisms that are relevant to the student cohorts involved e.g. online, via a student app, or a student handbook.	All students are informed about the relevant policy and procedure	✓

¹ TEQSA Guidance Note: Grievance and Complaint Handling (February 2019)

Grievance and Complaint Handling at AGE

9	Information for students will need to include who to contact and may include any additional advice that the provider regards as helpful e.g. advice to seek local resolution where practicable and how this might be done. If local (and informal) resolution is encouraged, staff do not discourage students from lodging formal complaints where a student is not satisfied with the outcome of informal discussions.	All contact details are provided readily accessible – students are not discouraged from making formal complaints	✓
10	Grievance information needs to include definitions of behaviour that constitutes sexual assault or sexual harassment and contact details for support services.	The information provided to students is comprehensive and includes clear guidelines on sexual assault, harassment and relevant support services	✓
11	The provider's handling of formal complaints is consistent with both the provider's policies and the detailed requirements of the HES Framework including – costs; consistency; fairness; confidentiality; absence of reprisal; provision of advice; support; recording decisions and informing the student in writing of the outcome and the reasons.	The handling of formal complaints is consistent with both the policy/procedure and the HESF	✓
12	Providers should make every effort to resolve complaints within reasonable timeframes that should be stated within the policy framework.	The AGE policy and procedure is cognisant of the importance of timeliness	✓
13	There are processes for analysis and monitoring of complaints handling - patterns of recurring complaints relating to issues or processes, and if so, what action is taken to address this	Analysis and monitoring of complaints is managed appropriately, records maintained, and the opportunity for improvement is embedded	✓
14	Providers must make provision for review by specified independent third parties	Independent third parties are clearly nominated and accessible	✓
15	Private providers must make specific arrangements for independent review of complaints about issues not covered by a consumer protection agency or the OSO	Independent review is evident and accessible	✓

We consider each in turn –

1.

Policies and procedures are known to staff responsible for their implementation

AGE has in place a *Student Grievance Handling Policy and Procedure* in place that is known to ALL staff -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction.' 1.2, p1

All staff at AGE are aware of the policy (as part of staff induction and ongoing professional development).

'All AGE staff will undergo training as part of the induction program to ensure that they are aware of the requirements to apply this policy.' 5.2, p3

'For the purposes of communicating to and training staff, this policy and procedure will form part of the staff induction process.' 5.49, p8

2.

Policies and procedures are likely to be fit for their purpose and are consistent with the requirements of the standards, particularly Standards 2.4.1-2.4.5.

The *Student Grievance Handling Policy and Procedure* -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

- is fit for purpose.

The policy and procedure are consistent with the relevant HESF Threshold Standards -

2.4.1 *Current and prospective students have access to mechanisms that are capable of resolving grievances about any aspect of their experience with the higher education provider, its agents or related parties.*

AGE has in place a comprehensive and benchmarked *Student Grievance Handling Policy* -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction' (1.2, p1)

Additional policies related to student grievance are also readily accessible –

Assessment and Grading -

https://www.guildmusic.edu.au/files/ugd/87330e_cfba293f0ce2414989ab65162266ff69.pdf

Code of conduct and Shared responsibility -

https://www.guildmusic.edu.au/files/ugd/87330e_79eecd9b0cb4c24ae91f2625062303e.pdf

Course progression -

https://www.guildmusic.edu.au/files/ugd/87330e_cd84b8710e7649a497840e1d825ca372.pdf

Deferment, suspension and cancellation of study -

https://www.guildmusic.edu.au/files/ugd/87330e_afdeb882fd3d42059426cfb0695c13b8.pdf

Exclusion from a course or unit -

https://www.guildmusic.edu.au/files/ugd/87330e_f600edc787de48a5b1c6d77a3b44b8f2.pdf

Fees and refunds -

https://www.guildmusic.edu.au/files/ugd/87330e_a2dcda89d33c4adea6b7e952b2062ab1.pdf and

https://www.guildmusic.edu.au/files/ugd/87330e_299d0710e21041d78492aabe13689ab0.pdf

2.4.2 *There are policies and processes that deliver timely resolution of formal complaints and appeals against academic and administrative decisions without charge or at reasonable cost to students, and these are applied consistently, fairly and without reprisal.*

AGE has in place a comprehensive and benchmarked *Student Grievance Handling Policy* -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

Grievance and Complaint Handling at AGE

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an *effective, timely, fair and equitable* grievance handling system, which is easily *accessible* to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction' (1.2, p1)

There are no fees associated with grievances.

There are however, in place, a fee scheme for commonly related issues such as assessment re-checking; assessment/reassessment/markings; and supplementary assessment. All such fees are available on the public website - [Fees | Guild Music Copy](#)

2.4.3 *Institutional complaints-handling and appeals processes for formal complaints include provision for confidentiality, independent professional advice, advocacy and other support for the complainant or appellant, and provision for review by an appropriate independent third party if internal processes fail to resolve a grievance.*

AGE has in place a comprehensive and benchmarked *Student Grievance Handling Policy* –

https://www.guildmusic.edu.au/files/uqd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction' (1.2, p1)

Confidentiality is assured –

'All staff and students involved in a grievance handling process have responsibility to maintain the confidentiality of all parties except to share information with relevant parties' (4, p3)

'All records relating to grievances will be treated as confidential and will be covered by AGE's Privacy and Personal Information Policy and Procedure' (5.44 p9)

Independent professional advice is permissible.

Advocacy is encouraged –

'Where possible such consultations should take the form of face-to-face interviews. The complainant or the respondent may ask another person (who cannot act in the capacity of a legal practitioner) to accompany them to these interviews' (5.24, p6)

AGE has in place an independent third-party reviewer – IHEA.

2.4.4 *Decisions about formal complaints and appeals are recorded and the student concerned is informed in writing of the outcome and the reasons, and of further avenues of appeal where they exist and where the student could benefit.*

AGE has in place a comprehensive and benchmarked *Student Grievance Handling Policy* -

https://www.guildmusic.edu.au/files/uqd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

Considerable detail around recording, responding in writing, and other avenues of appeal are provided in Section 5 –

Grievance and Complaint Handling at AGE

Informal Grievance Resolution - 5.1 – 5.5 (p3)

Stage One: Formal Non-Academic Grievance – 5.6 - 5.13 (pp3-4)

Stage One: Formal Academic Grievance – 5.14- 5.21 (pp4-5)

Stage Two: Internal Appeal (Academic) – 5.22-5.26 (pp5-6)

Stage Two: Internal Appeal (Non-Academic) – 5.27- 5.31 (pp6-7)

Stage Three: External Appeal (International Students only – Ombudsman) – 5.32-5.35 (p7)

AGE has in place a comprehensive and benchmarked *Student Grievance Handling Policy* -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

Considerable detail around recording, responding in writing, and other avenues of appeal are provided in Section 5 –

Informal Grievance Resolution - 5.1 – 5.5 (p3)

Stage One: Formal Non-Academic Grievance – 5.6 - 5.13 (pp3-4)

Stage One: Formal Academic Grievance – 5.14- 5.21 (pp4-5)

Stage Two: Internal Appeal (Academic) – 5.22-5.26 (pp5-6)

Stage Two: Internal Appeal (Non-Academic) – 5.27- 5.31 (pp6-7)

Stage Three: External Appeal (International Students only – Ombudsman) – 5.32-5.35 (p7)

Stage Three: External Appeal (Domestic Students, and international students where the matter is not covered by the Overseas Students Ombudsman) – 5.36-5.39 (pp8)

Further Action – 5.40-5.41 (pp8-9)

Enrolment Status – 5.42 (p9)

Record Keeping, Confidentiality and Reporting – 5.43-5.47 (p9)

Approval, Publication and Training – 5.46-5.49 (p9)

Reviewable Decisions – 5.50-5.51 (p9-10)

Every attempt is made to resolve grievances internally – but every attempt is made to follow an appropriate and benchmarked procedure.

2.4.5 *If a formal complaint or appeal is upheld, any action required is initiated promptly.*

All action is timely and prompt.

3.

Delegations of authority for implementation of procedures consistent with the scale and nature of the provider, and evidence that the relevant staff are equipped for their role in administering grievances, including through training.

Delegations are clear and appropriate to the scale, size and nature of AGE.

AGE is a small provider currently offering a single award.

The policy and procedure -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

- supports the AGE's commitment to –

'(a) develop a culture that views grievances as opportunities to improve the organisation and how it works

(b) set in place a grievance handling system that is client-focussed and helps AGE to prevent grievances from recurring

(c) ensure that any grievances are resolved promptly, objectively, with sensitivity and with complete confidentiality

(d) ensure that the views of each complainant and respondent are respected and that any party to a grievance is not victimised; and

(e) ensure that there is a consistent response to grievances' 3.1, p2

Staff are equipped for their role in the associated processes and are provided with the necessary training and professional development

The key staff involved in the procedure are the Chief Executive Officer (CEO) and the Academic Director (AD) – both are experienced educators and are regularly supported through professional development in this space. All staff undergo training as part of the induction program.

'All AGE staff will undergo training as part of the induction program to ensure that they are aware of the requirements to apply this policy.' 5.2, p3

'For the purposes of communicating to and training staff, this policy and procedure will form part of the staff induction process.' 5.49, p8

4.

The provider's approach caters for grievances about any aspect of a student's experience, including with agents and related parties

The approach is comprehensive -

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction.' 1.2, p1

This policy does include agents and related parties -

'AGE will respond to any complaint or appeal an international student makes regarding their dealings with AGE, an education agent or any other third party.' 3.5, p3

This policy does NOT cover the review of results –

'This policy and procedure apply to all students at AGE, and to all staff involved in student grievance handling however, this policy does NOT cover the review of results for assessments tasks or the review or appeal of final unit grades. Please see the Assessment Policy and Procedure for details on how to request a review of results or request a review or appeal of final unit grades' 1.3, p1

The *Assessment Grading Policy and Procedure* can be viewed at -

https://www.guildmusic.edu.au/files/uqd/87330e_cfba293f0ce2414989ab65162266ff69.pdf

5.

Grievances about particularly sensitive issues (such as assault and sexual harassment) may require more specific approaches

Sensitive issues are catered for –

‘This policy and procedure outlines how the Australian Guild of Education (“AGE”) will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction.’ 1.2, p1

Special consideration is given to the sensitive issues of Sexual Assault and Sexual Harassment and are considered in detail on the AGE public website – [Students | Guild Music Copy/](#) behind Student Life (available to prospective and continuing students).

The student orientation process considers the issues in detail - especially on Day #2 –

Day 2- Student Services

[Information is provided to students on non-academic support services such as:]

- - Accessing Support services
 - Student support services, including referrals
 - Counselling and external support services
 - Understanding compassionate and compelling circumstances.
 - Information about policies and procedures generally, grievance procedures
 - Overseas student health cover
 - Complaints and appeals
 - How to apply for suspension
 - How to access information on minimum wages and to know their rights as an employee
 - Fees and refunds
 - CoE extensions
 - How to join the SRC
 - What AGE identifies as appropriate student behaviour.
 - Where to find the student handbook and Student Code of Conduct
 - How to access my student records

Sexual Assault and Sexual Harassment

Australian Guild of Education (AGE) is committed to furthering a positive learning and working environment and to the prevention of incidents of sexual misconduct.

Sexual Assault is clearly defined

Sexual assault includes a range of behaviours, all of which are unacceptable and constitute a crime.

Sexual assault occurs when a person is forced, coerced or tricked into sexual acts against their will or without their consent, including when they have given their consent. Sexual assault is often called other names such as: Sexual abuse, rape, indecent behaviour, indecent assault, sexual molestation, incest, child sexual abuse, child sexual assault, touching, ‘feeling up’, sexual harassment.

Examples of sexual assault may include (but are not limited) to:

- Two people in a relationship start engaging in sexual activity but Person A changes their mind and asks to stop. Person B refuses to stop and forces sexual activity.
- Person A has sexual intercourse with Person B when Person B does not want to or is unable to consent.
- Person A knows Person B does not want to or cannot consent, or has no reasonable grounds to believe Person B consented.
- A teacher manipulates a student to engage in sexual acts in exchange for better marks.

Grievance and Complaint Handling at AGE

Sexual Harassment is also clearly defined -

Sexual harassment. While the definition of sexual harassment varies across Australian (and other) jurisdictions, it generally involves an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which, in the circumstances, a reasonable person, aware of those circumstances, would anticipate the possibility that the person would feel offended, humiliated, or intimidated.

Examples of sexual harassment include:

- staring, leering or unwelcome touching
- suggestive comments or jokes
- unwanted invitations to go out on dates or requests for sex
- intrusive questions about a person's private life or body
- unnecessary familiarity, such as deliberately brushing up against a person
- emailing pornography or rude jokes
- displaying images of a sexual nature around the workplace
- communicating content of a sexual nature through social media or text messages.

The issue of consent is discussed –

Consent: Whilst definitions for consent to sexual activities also vary between jurisdictions, consent is essentially an agreement between people to engage in a sexual activity. Other important elements of consent are that it is mutual, freely given, informed, certain and clear, enthusiastic, reversible, specific and required throughout the activity.

AGE has a zero tolerance in related matters –

AGE maintains zero tolerance of negative behaviours, including sexual misconduct.

To achieve this, AGE is committed to:

- Implementing ongoing education and training for students and staff;
- Providing mechanisms for individuals to report any such behaviour to AGE, including anonymous reports;
- Promptly assessing all reports of such behaviour and/or referring such reports to the appropriate authorities;
- Applying the AGE Privacy and Personal Information Policy and the principles of procedural fairness and confidentiality to the investigation of such reports;
- Acting on the outcomes of such investigations in a timely and sensitive manner;
- Considering disciplinary action if a report is assessed to be vexatious or malicious.

AGE is committed to preventing sexual misconduct in its physical and online environments through ongoing education and training. This is achieved through education and prevention strategies, such as:

- Orientation programs for all students.
- Staff induction processes.
- First responder training.

How to report and access support is detailed –

How to Report

Individuals who have directly experienced sexual misconduct involving AGE staff or students have the right to decide what information they disclose. Individuals have a number of options to consider:

- Call AGE emergency number on +61 3 9966 3671;
- Report to the Police by calling 000;
- 1 800 Respect – National Sexual Assault, Domestic Family Violence Counselling Service;
- Talk to a AGME Designated Officer (first responder who is trained to provide an appropriate initial response, including advice about available AGE and external support services and the process for making a Report) or other AGE professional;
- Ask someone to make a report on their behalf;
- Take no action

Where a disclosure has been made to a AGE Designated Officer, where possible, AGE will respect an individual's choice to not make a report and will keep the disclosure confidential. In exceptional circumstances, where required by law or where there is a risk of significant harm to that individual's health and safety or another individual's health or safety, AGE may notify third parties, such as the police or child protection authorities.

For more important information regarding Critical Incident Reporting and related matters please visit our [Critical Incidents](#) page.

Grievance and Complaint Handling at AGE

Accessing Support

The safety and wellbeing of individuals who have been affected by sexual assault and sexual harassment are priorities of AGE. Individuals have a number of options of support:

- Academic Support: Special consideration and other types of support are available to assist with study.
- Employee Assistance Program: Free service that offers professional advice to AGE staff and their families.
- Outside AGE: Staff and students may prefer to seek support from counselling services outside of the institution.

Emergency Contacts

ON Campus Emergency (24/7)	Ph: +61 3 9966 3671
OFF Campus Emergency (24/7)	Ph: <u>Triple Zero (000)</u> for police, fire and ambulance.
EXTERNAL Counseling support & advice (24/7)	Ph: 1800 RESPECT (1800 737 737) for the <u>National Sexual Assault & Domestic Violence Help Line</u> .
Sexual Assault Crisis Line	Ph: 1800 806 292

This issue of confidentiality is also addressed –

Confidentiality and Record Keeping

All documentation relating to the incident of sexual assault or sexual harassment will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the process, as required by law, or as determined by limits to confidentiality (e.g. risk of harm to person or persons).

Written records should contain such information as is necessary for others to gain a clear understanding of the grounds upon which a concern was determined and the actions taken to address it.

AGE will capture data on de-identified disclosures and formal complaints in order to monitor incidents, patterns of behaviour, monitor effectiveness of this policy, continuous improvement and to prevent reoccurrences of sexual assault and sexual harassment.

Further information can be found in AGE's Policy in relation to sexual assault and sexual harassment, which is made available under Policies and Procedures.

6.

Policies and procedures need to focus on the safety and the support of the students involved, and staff should be specifically trained to receive such disclosures. The student decides whether an incident is reported to the police.

Policies and procedures *are mindful of student support.*

The associated policies include –

Student Support –

https://www.guildmusic.edu.au/files/ugd/87330e_a1055973621046089394ad8d65cbb5fe.pdf

Student at Risk and Early Intervention -

https://www.guildmusic.edu.au/files/ugd/87330e_791bd8a91fdd4c479a0be281ead1c136.pdf

Both focus on the wellbeing and safety of students.

The specific Student Grievance Handling Policy and Procedure -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

– itself is highly mindful of student safety and support.

‘This policy and procedure outlines how the Australian Guild of Education (“AGE”) will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction’ 1.2, p1

Student support is underlined with the AGE commitment to -

‘This policy and procedure supports AGE’s commitment to: (a) develop a culture that views grievances as opportunities to improve the organisation and how it works; (b) set in place a grievance handling system that is client-focussed and helps AGE to prevent grievances from recurring; (c) ensure that any grievances are resolved promptly, objectively, with sensitivity and with complete confidentiality; (d) ensure that the views of each complainant and respondent are respected and that any party to a grievance is not victimised; and (e) ensure that there is a consistent response to grievances.’ 3.1, p2

This support is further evidenced –

‘During all stages of the grievance handling process, AGE will take all steps to ensure that-

(a) the complainant and any respondent will not be victimised

(b) the complainant has an opportunity to formally present their case

(c) each party to a grievance is advised of their right to be accompanied and assisted by a support person at any relevant meetings

(d) a full explanation in writing for decisions and actions taken as part of the process will be provided - if so, requested by the complainant or a respondent

Grievance and Complaint Handling at AGE

(e) where the internal or external grievance handling or appeal process results in a decision that supports the complainant, AGE will immediately implement any decision and/or corrective and preventative action required and advise the complainant of the outcome

(f) the complainant has access to the internal stages of this grievance procedure at no cost. Costs for an external appeal will be shared equally by AGE and the complainant.' 3.4, pp 2-3

Staff are appropriately trained and appropriately informed -

'All staff and students involved in a grievance handling process have responsibility to maintain the confidentiality of all parties except to share information with relevant parties.' 4, p3

'All AGE staff will undergo training as part of the induction program to ensure that they are aware of the requirements to apply this policy.' 5.2, p3

Police involvement is a decision made by the student, possibly with staff intervention –

Where a disclosure has been made to a AGE Designated Officer, where possible, AGE will respect an individual's choice to not make a report and will keep the disclosure confidential. In exceptional circumstances, where required by law or where there is a risk of significant harm to that individual's health and safety or another individual's health or safety, AGE may notify third parties, such as the police or child protection authorities.

[Students | Guild Music Copy](#) – behind Student Life

7.

All relevant information required for students to access and participate in grievance processes is accurate, current and easily locatable in the public domain - through a dedicated section of the provider's website

All relevant information required for students to access and participate in grievance processes is accurate, current and easily locatable in the public domain - through a dedicated section of the provider's website

The *Student Grievance Handling Policy and Procedure* -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

– contains all the relevant information for students (and stakeholders) needed.

The information is current – the most recent refresh of the policy was March 22, 2024 -

8 Document Control

Approval Review	Details
Governing authority	Academic Board
Responsible officer	Academic Director
Endorsed by	Board of Directors
Date of approval	22 March 2024
Date of effect	1 April 2024
Updated	NA
Review date	1 April 2027
Version	V1_Est 2024

The policy and procedure are readily accessible via the AGE public website - [Policies & Forms | Guild Music Copy](#)

8.

Students have been informed about grievance processes and how to access them by mechanisms that are relevant to the student cohorts involved e.g. online, via a student app, or a student handbook.

All students are informed about the relevant policy and procedure.

The Student Grievance Handling Policy and Procedure -

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

– are readily available on the public website - [Policies & Forms | Guild Music Copy](#) – for prospective students

Commencing Students are provided with sufficient detail and access direction through the orientation program – especially Day #2 –

Day 2- Student Services

[Information is provided to students on non-academic support services such as:]

- - Accessing Support services
 - Student support services, including referrals
 - Counselling and external support services
 - Understanding compassionate and compelling circumstances.
 - Information about policies and procedures generally, grievance procedures
 - Overseas student health cover
 - Complaints and appeals
 - How to apply for suspension
 - How to access information on minimum wages and to know their rights as an employee
 - Fees and refunds
 - CoE extensions
 - How to join the SRC
 - What AGE identifies as appropriate student behaviour.
 - Where to find the student handbook and Student Code of Conduct
 - How to access my student records

Continuing students have ongoing access to the policies via the relevant student handbook/website –

Domestic Students –

https://www.guildmusic.edu.au/files/ugd/87330e_0a064bcae67d4ba7b758a70e591dcf44.pdf

International Students -

https://www.guildmusic.edu.au/files/ugd/87330e_f9c3394b91d24899b907e15dba11a461.pdf

Grievance and Complaint Handling at AGE

Complaints and Appeals

All students have the right to:

- ▶ Appeal against certain academic and administrative decisions taken by AGE.
- ▶ Lodge a complaint if they feel they have been wrongly treated by AGE or its staff members.

International students should also be aware of the implications of AGE decisions for their enrolment and student visa status.

Students can enter a complaint at any time but should be aware that appeals need to be submitted within a set timeframe. For grade appeals, this needs to be within five (5) working days of a student receiving the results of that assessment task. For appealing a grievance outcome, the student must appeal within ten (10) working days of receipt of the decision. Appeals lodged outside of this timeframe may be dismissed.

International students should familiarise themselves with the relevant rights and responsibilities as international students. See the [International Students Factsheet](#).

If you wish to lodge an appeal or complaint, you can get advice on how to proceed from Student Services and Administration or by email ceo@guildmusic.edu.au

All formal complaints are to be directed to: CEO; Australian Guild of Education; 376 Victoria St, North Melbourne, 3051

For more information, refer to AGE's Student Grievance Handling Policy and Procedure.

Extract from p31

The relevant policy and procedure (as well as related policies and procedures) are maintained on the AGE public website for easy access for all - [Policies & Forms | Guild Music Copy](#)

9.

Information for students will need to include who to contact and may include any additional advice that the provider regards as helpful e.g. advice to seek local resolution where practicable and how this might be done. If local (and informal) resolution is encouraged, staff do not discourage students from lodging formal complaints where a student is not satisfied with the outcome of informal discussions.

All contact details are provided and are readily accessible –

https://www.guildmusic.edu.au/files/ugd/87330e_368148bf3e814f3bb14d392b01c66a7e.pdf

A suitable contact email has been established – support@guildmusic.edu.au – 5.3, p3 – for informal grievance

A suitable postal address has been established – The Registrar, Australian Guild of Education, 376 Victoria Street, North Melbourne, 3051 VIC – for formal non-academic grievance

A suitable postal address has been put in place – The Academic Director, Australian Guild of Education, 376 Victoria Street, North Melbourne, 3051 VIC – for formal academic grievance

A Student Grievance Appeal Form -

https://www.guildmusic.edu.au/files/ugd/87330e_8fb1ebe7c633405cb67ba917aaf93cff.pdf

– is readily accessible on the AGE public website

Students are not discouraged from making formal complaints consistent with the AGE cultural philosophy -

‘Develop a culture that views grievances as opportunities to improve the organisation and how it works’. 3.1a, p2

10.

Grievance information needs to include definitions of behaviour that constitutes sexual assault or sexual harassment and contact details for support services.

The information provided to students is comprehensive and includes clear guidelines on sexual assault, harassment and relevant support services

Special consideration is given to the sensitive issues of Sexual Assault and Sexual Harassment and are considered in detail on the AGE public website – [Students | Guild Music Copy/](#) behind Student Life (available to prospective and continuing students).

The student orientation process considers the issues in detail - especially on Day #2 –

Day 2- Student Services

[Information is provided to students on non-academic support services such as:]

- - Accessing Support services
 - Student support services, including referrals
 - Counselling and external support services
 - Understanding compassionate and compelling circumstances.
 - Information about policies and procedures generally, grievance procedures
 - Overseas student health cover
 - Complaints and appeals
 - How to apply for suspension
 - How to access information on minimum wages and to know their rights as an employee
 - Fees and refunds
 - CoE extensions
 - How to join the SRC
 - What AGE identifies as appropriate student behaviour.
 - Where to find the student handbook and Student Code of Conduct
 - How to access my student records

Sexual Assault and Sexual Harassment

Australian Guild of Education (AGE) is committed to furthering a positive learning and working environment and to the prevention of incidents of sexual misconduct.

Sexual Assault is clearly defined

Sexual assault includes a range of behaviours, all of which are unacceptable and constitute a crime.

Sexual assault occurs when a person is forced, coerced or tricked into sexual acts against their will or without their consent, including when they have given their consent. Sexual assault is often called other names such as: Sexual abuse, rape, indecent behaviour, indecent assault, sexual molestation, incest, child sexual abuse, child sexual assault, touching, 'feeling up', sexual harassment.

Examples of sexual assault may include (but are not limited) to:

- Two people in a relationship start engaging in sexual activity but Person A changes their mind and asks to stop. Person B refuses to stop and forces sexual activity.
- Person A has sexual intercourse with Person B when Person B does not want to or is unable to consent.
- Person A knows Person B does not want to or cannot consent, or has no reasonable grounds to believe Person B consented.
- A teacher manipulates a student to engage in sexual acts in exchange for better marks.

Grievance and Complaint Handling at AGE

Sexual Harassment is also clearly defined -

Sexual harassment. While the definition of sexual harassment varies across Australian (and other) jurisdictions, it generally involves an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which, in the circumstances, a reasonable person, aware of those circumstances, would anticipate the possibility that the person would feel offended, humiliated, or intimidated.

Examples of sexual harassment include:

- staring, leering or unwelcome touching
- suggestive comments or jokes
- unwanted invitations to go out on dates or requests for sex
- intrusive questions about a person's private life or body
- unnecessary familiarity, such as deliberately brushing up against a person
- emailing pornography or rude jokes
- displaying images of a sexual nature around the workplace
- communicating content of a sexual nature through social media or text messages.

The issue of consent is discussed –

Consent: Whilst definitions for consent to sexual activities also vary between jurisdictions, consent is essentially an agreement between people to engage in a sexual activity. Other important elements of consent are that it is mutual, freely given, informed, certain and clear, enthusiastic, reversible, specific and required throughout the activity.

AGE has a zero tolerance in related matters –

AGE maintains zero tolerance of negative behaviours, including sexual misconduct.

To achieve this, AGE is committed to:

- Implementing ongoing education and training for students and staff;
- Providing mechanisms for individuals to report any such behaviour to AGE, including anonymous reports;
- Promptly assessing all reports of such behaviour and/or referring such reports to the appropriate authorities;
- Applying the AGE Privacy and Personal Information Policy and the principles of procedural fairness and confidentiality to the investigation of such reports;
- Acting on the outcomes of such investigations in a timely and sensitive manner;
- Considering disciplinary action if a report is assessed to be vexatious or malicious.

AGE is committed to preventing sexual misconduct in its physical and online environments through ongoing education and training. This is achieved through education and prevention strategies, such as:

- Orientation programs for all students.
- Staff induction processes.
- First responder training.

How to report and access support is detailed –

How to Report

Individuals who have directly experienced sexual misconduct involving AGE staff or students have the right to decide what information they disclose. Individuals have a number of options to consider:

- Call AGE emergency number on +61 3 9966 3671;
- Report to the Police by calling 000;
- 1 800 Respect – National Sexual Assault, Domestic Family Violence Counselling Service;
- Talk to a AGME Designated Officer (first responder who is trained to provide an appropriate initial response, including advice about available AGE and external support services and the process for making a Report) or other AGE professional;
- Ask someone to make a report on their behalf;
- Take no action

Where a disclosure has been made to a AGE Designated Officer, where possible, AGE will respect an individual's choice to not make a report and will keep the disclosure confidential. In exceptional circumstances, where required by law or where there is a risk of significant harm to that individual's health and safety or another individual's health or safety, AGE may notify third parties, such as the police or child protection authorities.

For more important information regarding Critical Incident Reporting and related matters please visit our [Critical Incidents](#) page.

Grievance and Complaint Handling at AGE

Accessing Support

The safety and wellbeing of individuals who have been affected by sexual assault and sexual harassment are priorities of AGE. Individuals have a number of options of support:

- Academic Support: Special consideration and other types of support are available to assist with study.
- Employee Assistance Program: Free service that offers professional advice to AGE staff and their families.
- Outside AGE: Staff and students may prefer to seek support from counselling services outside of the institution.

Emergency Contacts

ON Campus Emergency (24/7)	Ph: +61 3 9966 3671
OFF Campus Emergency (24/7)	Ph: <u>Triple Zero (000)</u> for police, fire and ambulance.
EXTERNAL Counseling support & advice (24/7)	Ph: 1800 RESPECT (1800 737 737) for the <u>National Sexual Assault & Domestic Violence Help Line</u> .
Sexual Assault Crisis Line	Ph: 1800 806 292

This issue of confidentiality is also addressed –

Confidentiality and Record Keeping

All documentation relating to the incident of sexual assault or sexual harassment will be kept confidential and shall be disclosed only to those persons who have a right to the information by virtue of their role in the process, as required by law, or as determined by limits to confidentiality (e.g. risk of harm to person or persons).

Written records should contain such information as is necessary for others to gain a clear understanding of the grounds upon which a concern was determined and the actions taken to address it.

AGE will capture data on de-identified disclosures and formal complaints in order to monitor incidents, patterns of behaviour, monitor effectiveness of this policy, continuous improvement and to prevent reoccurrences of sexual assault and sexual harassment.

Further information can be found in AGE's Policy in relation to sexual assault and sexual harassment, which is made available under Policies and Procedures.

In addition, student support is further emphasised and maintained via two additional key policies and procedures –

Student Support –

https://www.guildmusic.edu.au/files/ugd/87330e_a1055973621046089394ad8d65cbb5fe.pdf

Student at Risk and Early Intervention -

https://www.guildmusic.edu.au/files/ugd/87330e_791bd8a91fdd4c479a0be281ead1c136.pdf

11.

The provider's handling of formal complaints is consistent with both the provider's policies and the detailed requirements of the HES Framework including – costs; consistency; fairness; confidentiality; absence of reprisal; provision of advice; support; recording decisions and informing the student in writing of the outcome and the reasons.

The handling of formal complaints is consistent with both the policy/procedure and the HESF.

Costs

'The complainant has access to the internal stages of this grievance procedure at no cost. Costs for an external appeal will be shared equally by AGE and the complainant.' 3.4f, p3

Consistency

A highlighted aim of the grievance process is to ensure consistency –

'Ensure that there is a consistent response to grievances.' 3.1e, p2

Fairness

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction' 1.2, p1

Confidentiality

'All records relating to grievances will be treated as confidential and will be covered by AGE's Privacy and Personal Information Policy and Procedure.' 5.44, p9

The Information Privacy Policy can be viewed at -

https://www.guildmusic.edu.au/files/ugd/87330e_1acf94a5176041eb9d1c3368317b8896.pdf

Support

'Ensure that the views of each complainant and respondent are respected and that any party to a grievance is not victimised' 3.1d, p2

'The complainant and any respondent will not be victimised' 3.4a, p2

'Each party to a grievance is advised of their right to be accompanied and assisted by a support person at any relevant meetings' 3.4c, p2

Grievance and Complaint Handling at AGE

'Students who do not feel safe or confident to take such action [a complaint] may seek assistance from the Registrar (or the Equivalent Officer) or the Compliance, Quality and Risk Manager for advice and support, or to initiate action on their behalf.' 5.4, p3

Recording decisions

'All formal academic grievances will be reported to the Academic Board whilst maintaining student confidentiality.' 5.45, p9

AGE has in place a Complaints Register

'All formal non-academic grievances will be reported to AGE's Executive Management Committee.' 5.46, p9

'A summary reporting showing the effectiveness of the grievances process will be reported to the Board of Directors annually.' 5.47, p9

Informing the student in writing of outcome and reasons

'Receipt of the grievance will be acknowledged in writing. The grievance handling process will commence within ten (10) working days of the receipt of the formal grievance. All reasonable measures will be taken to finalise the process as soon as practicable.' 5.7, p4

'A full explanation in writing for decisions and actions taken as part of the process will be provided if so requested by the complainant or a respondent.' 3.4d, p2

12.

Providers should make every effort to resolve complaints within reasonable timeframes that should be stated within the policy framework

The AGE policy and procedure is cognisant of the importance of timeliness.

'This policy and procedure outlines how the Australian Guild of Education ("AGE") will operate an effective, timely, fair and equitable grievance handling system, which is easily accessible to all complainants. The grievance handling process is designed to ensure that AGE responds effectively to individual cases of dissatisfaction.' 1.2, p1

'Ensure that any grievances are resolved promptly, objectively, with sensitivity and with complete confidentiality' 3.1c, p2

'Receipt of the grievance will be acknowledged in writing. The grievance handling process will commence within ten (10) working days of the receipt of the formal grievance. All reasonable measures will be taken to finalise the process as soon as practicable.' 5.7, p4

'The recipient of the grievance or their delegate will then endeavour to resolve the grievance and will provide a written report to the complainant on the steps taken to address the grievance, including the reasons for the decision, within ten (10) working days. The report will further advise the complainant of their right to access the internal appeals process if they are not satisfied with the outcome of their formal grievance' 5.8, p4

'Receipt of the academic grievance will be acknowledged in writing. The grievance handling process will commence within ten (10) working days of the receipt of the formal grievance. All reasonable measures will be taken to finalise the process as soon as practicable.' 5.15, p5

'The Academic Director or their delegate will then endeavour to resolve the grievance and will provide a written report to the complainant on the steps taken to address the grievance, including the reasons for the decision, within ten (10) working days. The report will further advise the complainant of their right to access the internal appeals process if they are not satisfied with the outcome of their formal grievance' 5.17, p5

'Following the consultation, the CEO or their delegate will provide a written report to the complainant advising the further steps taken to address the grievance, including the reasons for the decision, within ten (10) working days. The report will further advise the complainant of their right to access the external appeals process if they are not satisfied with the outcome of their internal appeal.' 5.25, p6

13.

There are processes for analysis and monitoring of complaints handling - patterns of recurring complaints relating to issues or processes, and if so, what action is taken to address this

Analysis and monitoring of complaints is managed appropriately

AGE has in place a Complaints Register

'All formal academic grievances will be reported to the Academic Board whilst maintaining student confidentiality' 5.45, p9

'All formal non-academic grievances will be reported to AGE's Executive Management Committee. 5.46, p9

'A summary reporting showing the effectiveness of the grievances process will be reported to the Board of Directors annually.' 5.47, p9

Records are maintained

'A written record of all grievances handled under this policy and procedure and their outcomes shall be maintained for at least five (5) years to allow all parties to the grievance appropriate access to these records' 5.43, p9

'All records relating to grievances will be treated as confidential and will be covered by AGE's Privacy and Personal Information Policy and Procedure.' 5.44, p9

The opportunity for improvement is embedded

'For the purposes of communicating to and training staff, this policy and procedure will form part of the staff induction process.' 5.49, p9

'A summary reporting showing the effectiveness of the grievances process will be reported to the Board of Directors annually.' 5.47, p9

14.

Providers must make provision for review by specified independent third parties

Independent third parties are clearly nominated and accessible

For international students

'If the complainant is dissatisfied with the outcome of their internal appeal and they are an international student, they may lodge an external appeal by contacting the Overseas Students Ombudsman.' 5.22, p7 - [About us | Commonwealth Ombudsman](#) or 1300 362 072, 5.44, p7

For domestic and/or international students

'If not satisfied with the decision in Stage Two, and the matter is not within the purview of the Overseas Students Ombudsman, the complainant or AGE may request that the matter be dealt with through an external dispute resolution process via Independent Higher Education Australia (IHEA) - [IHEA - peak body representing independent higher education providers](#) – (03) 9642 5212. 5.36, p8

Additional options

'If a grievance remains unresolved after the external dispute resolution process, the complainant may decide to refer the matter to an external agency such as the *Anti-Discrimination Board*, *Australian Competition and Consumer Commission* or the *Office of Fair Trading* or *Tertiary Education Quality and Standards Agency (TEQSA)*.' 5.40, p8

15.

Private providers must make specific arrangements for independent review of complaints about issues not covered by a consumer protection agency or the OSO

Independent review is evident and accessible

For international students

'If the complainant is dissatisfied with the outcome of their internal appeal and they are an international student, they may lodge an external appeal by contacting the Overseas Students Ombudsman.' 5.22, p7 - [About us | Commonwealth Ombudsman](#) or 1300 362 072, 5.44, p7

For domestic and/or international students

'If not satisfied with the decision in Stage Two, and the matter is not within the purview of the Overseas Students Ombudsman, the complainant or AGE may request that the matter be dealt with through an external dispute resolution process via Independent Higher Education Australia (IHEA) - [IHEA - peak body representing independent higher education providers](#) – (03) 9642 5212. 5.36, p8

Additional options

'If a grievance remains unresolved after the external dispute resolution process, the complainant may decide to refer the matter to an external agency such as the *Anti-Discrimination Board*, *Australian Competition and Consumer Commission* or the *Office of Fair Trading* or *Tertiary Education Quality and Standards Agency (TEQSA)*.' 5.40, p8

Anti-Discrimination Board – [Discrimination | Victorian Equal Opportunity and Human Rights Commission](#)

Australian Competition and Consumer Commission – [Home | ACCC](#)

Office of Fair Trading - [Consumer Affairs Victoria - Consumer Affairs Victoria](#)

Tertiary Quality and Standards Agency - [TEQSA | Tertiary Education Quality and Standards Agency](#)

About the Authors

Emeritus Professor Greg Whateley is the Chief Executive and Executive Dean at AGE

Professor Elizabeth Woollacott is the Registrar and Head of Performance and Arts Management at AGE

Acknowledgements

The Academy of Music and Performing Arts - [AMPA - Academy of Music and Performing Arts - AMPA | Academy of Music and Performing Arts](#)

Institute of Creative Arts and Technology - [Institute of Creative Arts and Technologies Courses Sydney & Melbourne \(icat.edu.au\)](#)

Universal Business School Sydney - [UBSS Australia](#)

Australian Institute of Music - [The Australian Institute of Music \(aim.edu.au\)](#)

Also see –

TEQSA (2019) – Grievance and Complaint Handling - <https://www.teqsa.gov.au/guides-resources/resources/guidance-notes/guidance-note-grievance-and-complaint-handling>

Whateley (2024) – Good compliance is good business - [6113ad_6c3cfa0b3a084f53a8373408af0e74d0.pdf](#)

Whateley (2024) – Rolling Audits – a mechanism for self-assurance - [6113ad_beb80a2de7ae43dc9fb8c7bedfa4e78b.pdf](#)

Whateley (2024) – Student Support – Academic and Non-academic - [6113ad_526404439d84444ab36a3757d9d9bcaa.pdf](#)