

Grievances, Complaints and Appeals Policy

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Document Owner: Operations Manager	Jurisdictions: ACT, NSW, QLD, TAS and WA

1. Purpose

This policy aims to ensure NECA Training:

- provides a fair, transparent, and accessible process for all persons to raise grievances, lodge complaints, and appeal decisions;
- meets its obligations under the Outcome Standards for NVR Registered Training Organisations Instrument 2025;
- applies the principles of natural justice and procedural fairness at every stage of the complaints and appeals process;
- uses complaint and appeal outcomes to inform continuous improvement; and
- complies with applicable state funding contract complaints obligations.

2. Scope

This policy applies to all students, prospective students, former students, employers of apprentices and trainees, staff, trainers, assessors, contractors, volunteers, and any other person who interacts with NECA Training in connection with its operations as a Registered Training Organisation across the ACT, NSW, QLD, TAS, and WA.

Employment-related workplace grievances (such as disputes about pay, leave, or workplace conditions that do not relate to the provision of training services) are managed through NECA Training's human resources policies and are not within the scope of this policy.

3. Responsibilities

3.1 Chief Executive Officer

The Chief Executive Officer is the final point of internal escalation for unresolved complaints and approves the engagement of independent reviewers for appeals.

3.2 Operations Manager

The Operations Manager is the Document Owner and is responsible for the effective operation of the complaints and appeals system. Where a matter relates to a specific state's operations, the relevant state-qualified Operations Manager manages it operationally. The Operations Manager receives, assesses, and resolves complaints and appeals; communicates outcomes; and escalates unresolved or serious matters to the Chief Executive Officer.

3.3 LSCC Manager

The LSCC Manager monitors the compliance of the complaints and appeals system with the Outcome Standards and applicable state funding contract requirements, and ensures outcomes are integrated into the continuous improvement program.

3.4 Administrative Support

Administrative Support staff log complaints and appeals, issue acknowledgement correspondence, and maintain the Complaints and Appeals Register (GCA-001-REG-001). Operational procedures are set out in GCA-001-PRO.

3.5 Senior Technical Trainer

The Senior Technical Trainer (or a delegate who is a different assessor from the original) conducts reassessments for assessment appeals.

3.6 All Staff

All staff, trainers, assessors, and contractors are responsible for being aware of this policy, treating complaints seriously, attempting informal resolution where appropriate, and referring formal complaints to the relevant Operations Manager.

4. Policy

NECA Training is committed to managing grievances, complaints, and appeals in a manner that is fair, efficient, and effective. NECA Training will:

- maintain a complaints and appeals management system that is publicly available, easily accessible, and communicated to all students, staff, contractors, and stakeholders;
- allow feedback and complaints about NECA Training, third parties providing services on its behalf, and persons employed or contracted by NECA Training;
- allow students to appeal decisions that adversely affect them, including assessment decisions, enrolment decisions, course progress decisions, and disciplinary decisions;
- apply the principles of natural justice and procedural fairness at every stage of the complaints and appeals process;
- identify and communicate reasonable timeframes for acknowledging, responding to, and resolving complaints and appeals;
- handle complaints and appeals confidentially, sharing information only with those who have a need to know for the purpose of managing and resolving the matter;
- provide avenues for further action where a complaint is not resolved, including escalation to senior management and referral to external bodies;
- provide access to an independent reviewer for appeals, at no or low cost to the student, where the student is not satisfied with the internal outcome;
- support students to provide feedback and make complaints, including by making available a support person;
- document and communicate outcomes to all parties;
- use complaint and appeal outcomes to inform continuous improvement; and
- not victimise or disadvantage any person for making a complaint, lodging an appeal, or participating in a complaint or appeal process in good faith.

4.1 Types of Complaints and Appeals

This policy covers three categories of matters:

- Complaints and grievances - any expression of dissatisfaction about NECA Training's operations, including matters that may also be managed under specialist policies (PIM-001-POL for privacy, AEA-001-POL for discrimination, CSP-001-POL for child safety). The complaints process under this policy applies to all such matters unless the specialist policy specifies an alternative process.

- Assessment appeals - appeals of assessment decisions, managed through a reassessment process as set out in GCA-001-PRO.
- Other appeals - appeals of non-assessment decisions that adversely affect a student, including enrolment, course progress, disciplinary, withdrawal, and fee decisions.

4.2 Timeframes

Stage	Timeframe
Written acknowledgement of complaint or appeal	2 business days from receipt
Target resolution - complaints and grievances	20 business days from receipt of formal complaint
Target resolution - appeals	20 business days from receipt of formal appeal
Written notification of outcome	5 business days from determination of outcome
Notification where resolution exceeds 60 calendar days	Written notification with reasons, followed by progress updates at least every 20 business days

These timeframes do not limit the complainant's or appellant's right to refer the matter to an external body at any time.

4.3 Independent Review

Where an appellant is not satisfied with the outcome of the internal appeals process, NECA Training will facilitate access to an independent reviewer in accordance with Outcome Standard 2.8. NECA Training will provide the independent review at no cost to the appellant. The selection, engagement, and conduct of independent reviews is set out in GCA-001-PRO.

4.4 External Escalation

Complainants and appellants may refer their matter to an external body at any time. NECA Training will advise all complainants and appellants of their right to external escalation at the time of acknowledgement and at the time of communicating the outcome. For complaints relating to QLD Skills Assure Supplier funded training, NECA Training will advise complainants that they may escalate to the Queensland Department of Trade, Employment and Training or the Queensland Training Ombudsman, as required under the QLD SAS Agreement. External escalation contacts for all jurisdictions are listed in GCA-001-PRO.

4.5 Records Management

Complaint and appeal records are stored in the Octossure Complaints Management module. The Complaints and Appeals Register (GCA-001-REG-001) is maintained in Octossure. Where a complaint or appeal relates to a specific student and the outcome affects the student's enrolment or training record, relevant correspondence is cross-referenced in the student's file in VETtrak.

Complaint and appeal records are retained for a minimum of 7 years from the date of resolution. For complaints relating to QLD Skills Assure Supplier funded training, records are retained for the longer of 7 years from resolution or 7 years from termination of the SAS Agreement (QLD SAS Agreement cl 13.2).

4.6 Continuous Improvement

Complaint and appeal outcomes are reviewed and used to inform improvements to NECA Training's operations, training, and assessment practices in accordance with the Continuous Improvement Policy and Procedures (CIP-001-POL and CIP-001-PRO). Continuous improvement actions arising from complaints and appeals are captured in the Octosure Continuous Improvement module to support demonstrable compliance with Outcome Standard 4.4.

4.7 Access and Equity

NECA Training ensures the complaints and appeals process is accessible and equitable for all persons in accordance with the Access, Equity and Anti-Discrimination Policy (AEA-001-POL). This includes providing information in accessible formats on request, arranging interpretation or translation assistance where practicable, and making reasonable adjustments to enable participation in the process.

5. Legislative Framework

NECA Training's grievances, complaints, and appeals obligations are established by the following legislative and regulatory framework.

Jurisdiction	Key Legislation	Relevance to Complaints and Appeals
Commonwealth (Instrument)	Outcome Standards for NVR Registered Training Organisations Instrument 2025 (F2025L00354)	Standards 2.7 (complaints management) and 2.8 (appeals) - primary regulatory driver. Standard 4.4 - continuous improvement from complaint and appeal outcomes.
Commonwealth (Instrument)	Compliance Standards for NVR Registered Training Organisations Instrument 2025 (F2025L00355)	Establishes operational obligations the breach of which may generate complaints (e.g. ss.7-8 marketing, s.10 records, s.17 third party arrangements).
Commonwealth	National Vocational Education and Training Regulator Act 2011, C25 (14 Oct 2024)	Establishes ASQA's regulatory framework and external complaints handling function.
Commonwealth	Privacy Act 1988 (Cth), C103 (10 Jun 2025)	Privacy-related complaints managed with cross-reference to PIM-001-PRO.
Commonwealth	Competition and Consumer Act 2010 (Cth), C163 (28 Mar 2026)	Australian Consumer Law (Schedule 2) provisions relevant to student fee, enrolment, and service delivery complaints.
ACT	Discrimination Act 1991 (ACT), republication for A2026-4 (23 Feb 2026)	Discrimination and harassment complaints. Cross-reference to AEA-001-

		POL.
NSW	Anti-Discrimination Act 1977 No 48	Discrimination and harassment complaints. Cross-reference to AEA-001-POL.
QLD	Anti-Discrimination Act 1991 (QLD), current as at 19 May 2025	Discrimination and harassment complaints. Cross-reference to AEA-001-POL.
QLD	Information Privacy Act 2009 (QLD), current as at 1 July 2025	QLD SAS Agreement cl 19 requires documented complaints procedures for information privacy breaches. Cross-reference to PIM-001-PRO.
TAS	Anti-Discrimination Act 1998 (Tas)	Discrimination complaints. Cross-reference to AEA-001-POL.
WA	Equal Opportunity Act 1984 (WA)	Discrimination complaints. Cross-reference to AEA-001-POL.

The currency of legislative references in this document is confirmed as at the version date recorded in the footer. Amendments to legislation are monitored through the Legislative Reference Register. For questions about this policy or legislative requirements, contact the LSCC Manager.

6. Definitions

Term	Definition
Appeal	A formal request by a student for a review of a decision made by NECA Training, a third party, or a person employed or contracted by NECA Training, where that decision adversely affects the student.
Appellant	A person who lodges an appeal.
Complaint	An expression of dissatisfaction about any matter relating to NECA Training's operations as an RTO, where the person making the complaint expects a response or resolution.
Complainant	A person who lodges a complaint or grievance.
Grievance	A concern or dissatisfaction that a person raises about a matter affecting them in the context of NECA Training's operations. For the purposes of this policy, grievances and complaints are managed through the same process.
Independent Reviewer	A person external to NECA Training engaged to conduct an independent review of an appeal. Must be appropriately qualified and free from conflict of interest. Selected in accordance with GCA-001-PRO.
Procedural	The requirement that processes are conducted fairly, impartially, and

Fairness	transparently, affording all parties the opportunity to present their case and respond to adverse findings. Also referred to as natural justice.
Respondent	A person against whom a complaint is made or whose decision is the subject of an appeal.
Support Person	A person chosen by the complainant or appellant to provide support during the process. A support person does not act as an advocate unless invited to do so.

7. Associated Documents and Forms

Document	Reference
Grievances, Complaints and Appeals Procedures	GCA-001-PRO
Complaint and Grievance Lodgement Form	GCA-001-FRM-001
Appeal Lodgement Form	GCA-001-FRM-002
Complaints and Appeals Register	GCA-001-REG-001
Consumer Protection Policy & Procedures	CPP-001-POL & CPP-001-PRO
Access, Equity and Anti-Discrimination Policy & Procedures	AEA-001-POL & AEA-001-PRO
Student Disciplinary Policy & Procedures	DIS-001-POL & DIS-001-PRO
Privacy and Information Management Policy & Procedures	PIM-001-POL & PIM-001-PRO
Child Safe Policy & Procedures	CSP-001-POL & CSP-001-PRO
Continuous Improvement Policy & Procedures	CIP-001-POL & CIP-001-PRO
Student Handbook	SHB-001-HBK