

### 1. Overview

Sydney Institute of Health Sciences Pty Ltd trading as Sydney Institute of Traditional Chinese Medicine (“SITCM”) is committed to developing and maintaining an effective, timely, fair and equitable grievance handling system which is easily accessible to all complainants.

SITCM aims to:

- Develop a culture that views grievances as an opportunity to improve the organisation and how it works;
- Set in place a grievance handling system that is client focussed and helps SITCM to prevent grievances from recurring;
- Ensure that any grievances are resolved promptly, objectively and with sensitivity and in complete confidentiality;
- Ensure that the views of each complainant and respondent are respected and that any party to a grievance is not discriminated against nor victimised;
- Ensure that there is a consistent response to grievances.

A grievance can be defined as a person’s expression of dissatisfaction with any aspect of SITCM’s services and activities, including both academic and non-academic matters, such as:

- the enrolment, induction/orientation process;
- the quality of education provided;
- academic issues, including student progress, assessment, curriculum and awards in a course of study;
- handling of personal information and access to personal records;
- the way someone has been treated.

These grievance procedures are designed to ensure that SITCM responds effectively to individual cases of dissatisfaction.

### 2. Policy coverage

In relation to grievances, the term “complainant” applies to current students of SITCM, persons seeking to enrol with SITCM, persons undertaking clinical practice as a supervisee, and any person undertaking non-award study with SITCM.

### 3. Before an issue becomes a formal grievance

Complainants are encouraged, wherever possible, to resolve concerns or difficulties informally with the person(s) concerned. There are staff available to assist the resolution of issues at this level. Complainants may raise an informal grievance by contacting the Administration Office in person or by phoning (02) 9212 1968, and asking to speak to the Student Support Officer. Please note that it is not mandatory for complainants to raise a grievance informally.

## 4. Procedure

This procedure can be utilised by complainants to submit a grievance of an academic or non-academic nature. Grievances of an academic nature include issues related to student progress, assessment, curriculum and awards in a course of study. Grievances of a non-academic nature cover all other matters including grievances in relation to personal information that SITCM holds in relation to an individual.

During all stages of this procedure SITCM will take all steps to ensure that:

- the complainant and any respondent will not be victimised or discriminated against;
- those involved in the allegation/s are informed and provided with an opportunity to present their side of the matter;
- the complainant has an opportunity to formally present their case and each party to a grievance may be accompanied and assisted by a support person at any relevant meetings;
- a full explanation in writing for decisions and actions taken as part of the process will be provided;
- where the internal or external grievance handling or appeal process results in a decision that supports the complainant, SITCM will immediately implement any decision and/or corrective and preventative action required and advise the complainant of the outcome;
- a complainant shall have access to the internal stages of this grievance procedure at no cost. Costs for an external appeal will be shared equally by SITCM and the complainant. If a party to the internal and external stages of this grievance procedure wishes to be accompanied or assisted by another person other than by SITCM staff, it will be at that party's cost.

### 4.1 Stage one – formal grievance:

Formal grievances must be submitted in writing marked to the attention of the Registrar as follows:

Registrar  
Sydney Institute of Traditional Chinese Medicine  
502, 25-29 Dixon St  
Sydney 2000

Receipt of the grievance will be acknowledged in writing. The grievance handling process will commence within ten working days of the receipt of the formal grievance and all reasonable measures will be taken to finalise the process as soon as practicable. If the process will take more than 60 days to finalise, SITCM will write to the people involved explaining the delay and regularly update them in writing on the progress of the matter.

The Registrar, or their nominee, will then, if necessary, seek to clarify the outcome that the complainant hopes to achieve.

Such clarification may be sought by written or verbal request or by a face-to-face interview with the complainant. When such clarification occurs in a face-to-face interview the complainant or respondent may ask another person to accompany them.

The Registrar, or their nominee, 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 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.

## 4.2 Stage two – internal appeal:

If a complainant is dissatisfied with the outcome of their formal grievance they may lodge an appeal with the CEO (who is senior to the original decision maker) within 20 working days of receiving notification of the outcome of their formal grievance in writing to:

CEO  
Sydney Institute of Traditional Chinese Medicine  
502, 25-29 Dixon St  
Sydney 2000

The CEO will appoint an appropriate person or committee to consult with the complainant and other relevant parties within ten working days.

Where possible such consultations should take the form of face-to-face interviews. The complainant or the respondent may ask another person to accompany them to these interviews.

Following the consultation, the CEO, or their nominee, 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 working days. If the decision supports the student, SITCM will immediately implement the decision and/or corrective or preventative action. 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.

## 4.3 Stage three – external appeal (domestic students):

If the Complainant is not satisfied with the outcome of their appeal then an independent mediator can be requested through LEADR/IAMA. Complainants can contact LEADR/IAMA directly as follows:

<b>Address:</b>	Level 1, 13-15 Bridge Street, Sydney NSW 2000		
<b>Phone:</b>	02 9251 3366	<b>Free call:</b>	1800 651 650
<b>Fax:</b>	02 9251 3733	<b>Email:</b>	<a href="mailto:infoaus@leadriama.org">infoaus@leadriama.org</a>

Costs of such mediation will be shared equally by SITCM and the Complainant. As a guide mediator's costs would be \$385 for the first four hours (or part thereof). Subsequent hours would be \$137.50 per hour. It is common for most disputes to be resolved within the initial four hour allocation.

SITCM agrees to be bound by the recommendations arising from the external review of the complaint and the CEO will ensure that if the decision supports the student, SITCM will immediately implement the decision and/or corrective or preventative action.

Each party will be given notice of the decision on review, including the reasons for the decision.

## 4.4 Stage three – external appeal (international students):

If the complainant is dissatisfied with the outcome of their appeal and they are an international student then they may lodge an external appeal by contacting the *Overseas Students Ombudsman*.

The *Overseas Students Ombudsman* offers a free and independent service for international students who have a complaint or want to lodge an external appeal about a decision made by their training provider. Refer to the Overseas Students Ombudsman website [www.oso.gov.au](http://www.oso.gov.au) or phone 1300 362 072 for more information.

SITCM agrees to be bound by any recommendations from the *Overseas Students Ombudsman* and the CEO will ensure that if the decision supports the student, SITCM will immediately implement the decision and/or corrective or preventative action.

Each party will be given notice of the decision on review, including the reasons for the decision.

## **5. Further action**

If a grievance still remains unresolved the complainant may decide to refer the matter to an external agency such as The Anti-Discrimination Board or The Office of Fair Trading.

The procedures set out in this document do not replace or modify procedures or any other responsibilities which may arise under other policies or under statute or any other law. Nothing in this policy and procedure limits the rights of individuals to take action under Australia's Consumer Protection laws. Also, these procedures do not circumscribe an individual's rights to pursue other legal remedies.

## **6. Enrolment status**

Where a current student chooses to access this policy and procedure, SITCM will maintain that person's enrolment while the grievance handling process is ongoing.

## **7. Record keeping and confidentiality**

A written record of all grievances handled under this procedure and their outcomes shall be maintained for a period of at least five years to allow all parties to the grievance appropriate access to these records, upon written request to the Administrator. These records will be maintained at 502, 25-29 Dixon St, Sydney 2000.

All records relating to grievances will be treated as confidential and will be covered by SITCM's *Personal Information Procedures*. SITCM will allow parties who used this grievance procedure to access the records of that use, but will otherwise keep the records confidential.

## **8. Approval, publication and training**

This Policy and Procedure was agreed to and ratified by the Board of Directors.

This Policy and Procedure will be made available to students and persons seeking to enrol with SITCM through publication in the Student Manual and on SITCM's website ([www.sitcm.edu.au](http://www.sitcm.edu.au)).

For the purposes of communicating to and training staff, this Policy and Procedure is included in the Staff Manual and forms part of the staff induction process.

## 9. Version control

Document: Academic and Non-academic Grievance Handling Policy and Procedure		
Policy Owner: Board of Directors		
Policy Developer and Reviewer: CEO	Version #: 6.0	Date: 25 May 2017

### Version History

Version	Authorised by	Approval Date	Details
1.0	Governing Council	8 December 2010	Document creation
2.0	Governing Council	9 July 2012	Review for FEE-HELP application Overseas Students Ombudsman
3.0	Governing Council	12 November 2012	Change external review process for domestic students
4.0	Board of Directors	2 December 2014	Regular review (no amendments)
4.1	CEO	20 May 2015	Minor change to sections 4.1 & 4.3
4.2	CEO	4 April 2016	Minor update to new logo and contact details
5.0	Board of Directors	25 September 2016	Update to be in line with VET and CRICOS standards
5.1	CEO	8 May 2017	Minor update to be in line with the <i>VET Student Loans Rules 2016</i>
6.0	Board of Directors	25 May 2017	Update of policy coverage and roles for the staged management of complaints