



PARAMOUNT COLLEGE  
OF NATURAL MEDICINE

Unit 11/15 Bonner Drive  
MALAGA WA 6090  
PO Box 2039  
MALAGA WA 6944

Tel: +61 8 9209 3335  
Fax: +61 8 9209 3339  
Email: [admin@paramountcollege.edu.au](mailto:admin@paramountcollege.edu.au)  
Website: [www.paramountcollege.edu.au](http://www.paramountcollege.edu.au)

ParaPharm Pty Ltd  
ACN 45 098 564 099

POLICY DOCUMENT 07  
GRIEVANCES, ACADEMIC & NON-ACADEMIC

REVISION HISTORY

REV	DATE	BY	CHCK'D	APPR'D	COMMENTS
A	31-08-02	PF	Review Team		Issued for Preliminary Review
0	04-11-02	PF	GB	GB	Approved for use
1	22-01-08	CH	GB	GB	Addition of Harassment Policy
2	17-07-08	GB	PWF	GB	Reformat and rewrite from old grievance policy
3	28-11-08	GB	PH	GB	Updated
4	15-12-08	GB	PH	GB	Section 4 updated to refer student to Student Re-credit & Review policy (PO-18)
5	24-04-09	GB	PH	GB	Section 5 updated to correct detail



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### 1.0 SCOPE OF POLICY

Paramount College has a fair and equitable process for dealing with grievances, both academic and non-academic, efficiently and effectively. Any student, staff or member of the public may lodge a complaint or grievance in the following areas (as appropriate):

- Academic issues, including:  
assessment, student progress, assessment extension requests, curriculum etc.
- Non-academic issues, including:  
technical issues, financial issues, harassment, discrimination, bullying, enrolment procedures, exclusion from events or facilities, breaches of privacy, etc.

Requests for re-credit of VET FEE-HELP balances are the subject of a separate policy, refer PO-18 - Student Re-Crediting Review Process.

### 2.0 OVERVIEW

Grievances of any kind usually represent an opportunity for improvement. Complaints may arise due to actions, decisions or omissions by Paramount College, its officers, employees and others, who may perform services for or on behalf of Paramount College.



Paramount College have arrangements for handling complaints and grievances which

- are easily accessible to students
- are provided at no cost to encourage timely resolution of the issue
- include provision for independent internal investigation of complaints which remain unresolved
- include provision for external review of decisions following an internal investigation and a mechanism for considering any recommendations arising from the external review (continuous improvement)
- are complete, transparent and agreed to and ratified by Paramount College's academic and non-academic officers, collectively referred to as the Board of Governors
- do not discriminate or victimise
- are communicated to staff, who are also trained in their application
- specify reasonable timelines for responses
- allow third party representation
- provide reasons and a full explanation in writing of decisions and actions taken and
- keep confidential accurate records of all grievances for at least 5 years

All students or prospective students are entitled to access this policy, regardless of their location of mode of study.

### **3.0 PRIVACY COMPLAINTS AND ADVICE**

Paramount College's Grievance Policy extends to complaints about misuse of personal information by the college, its officers, employees and others who perform services for or on behalf of the college relating to information obtained by Paramount College for the purposes of VET FEE-HELP assistance and repayment of HELP loans.

### **4.0 GRIEVANCE MANAGEMENT PROCESS**

Grievances are dealt with through a three step escalation process managed by the Administration Manager. Provision is made for external escalation if the first three steps fail to provide the Complainant with a satisfactory outcome.

At all times throughout and after the process, the confidentiality of the complainant and accuracy of the complaint are to be maintained impeccably; once a written complaint is received, all associated documentation and documentation arising from the complaint will be maintained for at least 5 years after the resolution of the complaint.



Steps include:

1. Complaint is made and dealt with by the receiver of the complaint in a informal manner.
2. Where the complaint is not resolved, the complaint is made in writing to the Administration Manager, who organises the review and resolution of the complaint.
3. Where the Administration Manager is unable to provide a satisfactory resolution to the Complainant, the complaint is referred to the Chief Executive Officer (CEO) and the Board of Governors, where the matter is reviewed in the next scheduled Board meeting.
4. Where the complaint is not resolved by the Board, the Board may advise the Complainant that they have the right to appeal to a nominated external mediator, after consultation with the Training Accreditation Council.

The mechanism of how complaints and grievances are escalated are detailed in the Grievances Management procedure, refer document PR-05.

#### 4.1 Definitions

The “**Complainant**” may include students, staff, members of the public, clients, parties/companies that deal with Paramount College, contractors and/or sub-contractors.

“**Paramount College Staff**” may include employees, contractors, sub-contractors, agents, or another student while acting on behalf of Paramount College.

“**Resolution**” refers to a decision made by the Reviewer concerning the complaint.

The “**Reviewer**” is a person or group assigned to receive, investigate, review and resolve the complaint. At Step 1, the Reviewer is the initial recipient, usually of a verbal complaint, at step 2, the Reviewer is appointed by the Administration Manager; at step 3 the Reviewer is the Board of Governors; a fourth step is provided for, in which case the Reviewer would be an external group or agency, as appropriate.

#### 4.2 Escalation

In the first instance, the Complainant should approach Paramount College Staff with the complaint. Paramount College Staff shall evaluate the complaint and where the complaint may be resolved, when within their area of responsibility, resolve the matter informally and face to face with the Complainant. Paramount College Staff shall advise the Complainant that if they are not happy with the proposed resolution they may formalise the complaint by putting it in writing to the Administration Manager (Form 05 - Grievance Form).

In the second instance, the Complainant approaches the Administration Manager to lodge a



formal Complaint. The Administration Manager shall evaluate the complaint and where the complaint maybe resolved, when within their area of responsibility, resolve the matter. Where the complaint is with regards to management, refer the complaint to the CEO or in regards to academic matters, refer the complaint to the Dean of Studies, etc. In referring the complaint, the nature and severity of the complaint should also be considered; if a serious situation has arisen, the complaint may be referred directly to the Board of Governors or external authorities if the complaint relates to an un-lawful situation.

In the third instance, where the outcome is not satisfactory to the Complainant, the Administration Manager refers the Matter to the Chief Executive Officer, for review by the Board of Governors. The Complainant may request this action within 28 days of receiving the initial resolution. The matter should be forwarded by the Administration Manager to the CEO identifying the following:

- The circumstances surrounding the situation
- Who was involved
- Why the Complainant is requesting the matter be addressed by the Board of Governors or why the Complainant feels unfairly treated
- Any evidence in control of Paramount College
- Any known evidence in control of the Complainant
- Date and where the situation took place
- The name of any witnesses to the situation

The CEO shall review the matter and provide a submission to the Board of Governors. Upon completion, the CEO submits the complaint to the Board of Governors and the matter shall be set down for discussion in the next scheduled board meeting. The Complainant will be notified when the Board shall discuss the matter and may be asked to attend the meeting and clarify points where required. The Board shall deliberate and provide in writing the Board's resolution when a decision is made.

In the fourth instance and in the event that a complaint or grievance can not be resolved within Paramount College, the Complainant will be advised in writing of the appropriate body where they can seek further assistance. In this event, independent mediation is available through the Australian Council for Private Education and Training (ACPET). Paramount College can liaise with the Training Accreditation Council in Western Australia as to alternative options, according to the nature of the complaint. Contact details and any associated costs will be advised to the complainant.



### **4.3 Process**

The Administration Manager receives the complaint on Form O5, checks the form, provides a time frame, classifies the complaint and assigns the complaint to the relevant department head to investigate and prepare a written resolution for the Complainant. Where the complaint concerns a Department Manager, the matter is referred to the CEO for resolution.

Where the complaint is in reference to VET FEE-HELP assistance, the matter is resolved in accordance with the VET FEE-HELP resolution guidelines (refer PO-18 Student Re-Crediting Review Process).

The complaint is registered in the corrective action register as a permanent record for future reference and action in the improvement process. The Administration Manager manages the complaint process through to resolution, ensuring written feedback of the resolution is provided to the Complainant and record of the complaint and resolution are made either in the Complainant's file or corrective action register.

The process of how complaints and grievances are escalated is outlined in the Grievances Management procedure, refer document PR-05.

### **4.4 Time limits and Review Cycles**

The severity of the complaint shall determine the speed and escalation process. Complaints received by Paramount College Staff which are concerned with harassment, influence of drugs or alcohol or any activity that is un-lawful, are immediately brought to the attention of the Administration Manager. The Administration Manager shall enforce immediate disciplinary action while the complaint is processed.

Subject to the above, the Administration Manager shall provide a time frame to the Complainant for provision of a resolution. Where possible, resolution of a written complaint should be received within 10 working days.

The Complainant has the right to lodge a complaint immediately upon being aggrieved. Early lodgement assists in speedy resolution and ensures current staff are advised and available for review.



Paramount College strives to provide initial resolution to all complaints within 10 business days of receipt of a written complaint. The Complainant is advised in writing of the resolution.

The Complainant has the right to request a review of their resolution. The Complainant has 28 calendar days to respond from the date when the Complainant received the resolution. This applies to all complaint resolutions regarding academic, non-academic or VET FEE-HELP Balance Re-credit resolutions.

Where the Complainant does not receive a revised resolution to a review within 45 days of applying for a review, the reviewer is taken to have confirmed the original resolution.

Complaints and grievances are managed as detailed in the Grievances Management procedure, refer document PR-05.

## **5.0 REQUIREMENTS FOR VET FEE-HELP GRIEVANCES**

Requests for re-credit of FEE-HELP balances are the subject of a separate policy, refer PO-18 - Student Re-Crediting and Review Process.

5.1 The grievance procedure deals with complaints relating to:

- a) non-academic matters from students who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the Higher Education Support Act 2003 (HESA); and
- b) non-academic matters from persons seeking to enrol in a unit of study that meets the course requirements under subclause 45(1) of Schedule 1A of the HESA and who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the HESA; and
- c) academic matters from students who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the HESA.

5.2 These grievance management procedure contains the following elements:

- a) an arrangement for handling complaints which is easily accessible to students who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the HESA without charge, or at reasonable cost to those students; and which encourages timely resolution of complaints; and



- b) an arrangement for the internal investigation of complaints which remain unresolved by the process by an independent and impartial senior officer of Paramount College who is nominated by Paramount College, or by a dedicated complaints committee or unit established by Paramount College; and
- c) a provision for external review of decisions by an independent person or body that is established or nominated by Paramount College.

### 5.3 Paramount College:

- a) have a mechanism in place to implement the grievance procedures, including due consideration of any recommendations arising from external review via the continuous improvement system;
- b) ensure that the grievance management procedure is complete, unambiguous and agreed to and ratified by the provider's governing body;
- c) will not victimise or discriminate against any complainant or respondent;
- d) publish and make publicly available details of the grievance procedures that relate to this chapter of the Guidelines;
- e) communicate the grievance procedures in writing to its staff and train its staff in their application;
- f) specify reasonable timelines for responses to each stage of the process;
- g) allow the complainant and/or respondent to be accompanied and assisted by a third party if desired;
- h) give reasons and full explanation in writing for decisions and actions taken as part of the procedures, if requested by the complainant and/or respondent;
- i) keep appropriate records of all grievances for at least five years, and allow parties to the complaint appropriate access to these records; and
- j) ensure that such records are treated as confidential.

5.4 Students who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the HESA, or persons seeking to enrol in a VET course of study comprising VET units of study that meet the course requirements under subclause 45(1) of Schedule 1A of the HESA and who are, or would be, entitled to VET FEE-HELP assistance under clause 43 of Schedule 1A of the HESA, are entitled to access the grievance procedures as set out by Paramount College, regardless of the location of the campus at which the grievance has arisen, the student's or person's place of residence or the mode in which they study.