PROCEDURE

Feedback Procedure (Compliments and Complaints)

1.0 Purpose

This procedure provides people and groups with a process to raise and resolve concerns promptly, fairly, and equitably, while applying principles of natural justice and procedural fairness.

The Institute will always consider feedback provided, regardless of who it is provided by or whether it is provided anonymously. It will, however, generally only communicate the outcome of feedback to the person the feedback relates to. Feedback received is used to respond to concerns, address mistakes and continuously improve Institute services.

For more information on the Institute position on the provision of feedback and policy principles, refer to the Feedback Policy (Compliments and Complaints).

2.0 Scope

The procedure applies to anyone who wants to provide feedback or make a complaint to the Institute about any matter. Feedback can be provided to the Institute by anyone; whether they are a student, member of the public, employee, contractor or supplier.

Feedback or complaints can be made in a variety of ways, including via telephone, email, online (including BKI managed social media channels) or by post.

Allegations of suspected improper conduct or corruption must be made and responded to confidentially using the process outlined in the Institute's *Speak Up Policy*.

This procedure does not include the rights of appeal for an assessment judgement, which is covered under the *Assessment Appeals Procedure* and the *Training and Assessment Policy*.

3.0 Legislative Reference

See 3.0 of Feedback Policy (Compliments and Complaints) – Legislative Context

4.0 Procedural Steps

No.	Phases and steps	Name of role who actions
4.1	Receiving and acknowledging feedback	
4.1.1	The primary method BKI accepts feedback (compliments and complaints) is via the Online Form on the Kangan Institute and Bendigo TAFE websites. The person submitting the feedback is required to enter all mandatory fields before feedback is lodged.	Person submitting the feedback

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No.	Phases and steps	Name of role who actions	
4.1.2	The Institute accepts feedback across all communication mediums that are directed to a BKI staff member including by email, face-to-face, online (including on official BKI social media pages), telephone and letter.	Employee Receiving Feedback	
	The Institute does not require a person to complete the Online Form in order to consider their feedback recognising that some individual's circumstances may mean completing the form may be challenging for them.		
	If feedback is received by a BKI staff member directly, the individual should be encouraged to lodge feedback via the Online Form or the staff member should do it on their behalf.		
	If feedback is received by email, the BKI staff member may forward the email to feedback@kangan.edu.au		
4.1.3	When feedback is submitted via Feedback / Complaints form, an email is automatically generated acknowledging receipt of the complaint/feedback, providing a timeframe for a response.		
4.2	Allocating Complaints / Triage		
4.2.1	 Once feedback is lodged, a New Entry is recorded in the Sharepoint Feedback Details and Reports Tool. 	System Generated	
	 In most cases, feedback is allocated to the area to which it relates. This enables that area to consider how to resolve, investigate and remedy the complaint. 	AND	
	• Some complaints activate certain obligations and should be referred to specific internal areas. This does not always mean the referred area responds to the complaint. These areas provide supporting advice and determine whether any issues need to be externally reported.	Governance Risk and Compliance	

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able below for a guide on type <u>Types of Feedback</u> rse / Teaching and essment / Delivery Quality / essibility	es of feedback and area allocated. Area Allocated Relevant teaching area Program Lead / Department Manager / Director depending on complexity of complaint. Where complaints are about a particular	
rse / Teaching and essment / Delivery Quality /	Relevant teaching area Program Lead / Department Manager / Director depending on complexity of complaint. Where complaints are about a particular	
rse / Teaching and essment / Delivery Quality /	Department Manager / Director depending on complexity of complaint. Where complaints are about a particular	
	issue, the teaching area may be required to consult and work with certain areas across the organisation (e.g. Student Services).	
	A full list is provided Complaint or Feedback Notification allocated to staff.	
Iment including Apprentice Trainee issues, and Pre- hing Review	Manager, Enquiries and Admissions Hub – Registrar's Office	
ipus Facilities	Manager Campus Operations	
ificates, Refunds, Fees and rges, Withdrawal, VET lent Loans	Manager, Student Records and Reporting / Team Leader Student Records – Registrar's Office	
d Safety	Child Safety Officer	
olier / Commercial	Procurement Manager	
oper Conduct or Speak Up orts	Head Governance, Risk and Compliance	
ulatory and Legal apliance	Head Governance, Risk and Compliance to coordinate	
loyee Behaviour / Bullying ployment Terms and ditions disputes	HR Business Partner / Head of People and Culture	
Inational Health and Safety	Head of Occupational Health and Safety	
olo pl dit	iance yee Behaviour / Bullying oyment Terms and	iance Compliance to coordinate yee Behaviour / Bullying oyment Terms and ions disputes HR Business Partner / Head of People and Culture

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No.	Phases and steps	Name of role who actions	
4.2.2	Assigned staff member receives, an auto-notification by email and Teams. The notification includes instruction and expectations that should be adhered to when handling feedback.	System Generated	
4.3	Decide on approach to respond		
4.3.1	 Decide on a Front-line resolution or Investigation response. Refer to Feedback Policy (Compliments and Complaints) which describes the two response approaches. 	Assigned Officer	
4.2.0	Consult Governance Risk and Compliance if unsure.		
4.3.2	Anonymous complaints	Assigned Officer	
	 If warranted, investigate anonymous feedback in the same way you would investigate feedback that is not anonymous as far as possible. 		
	 Anonymous feedback is to be treated the same as non-anonymous except no response is sent to the individual. 		
4.4	Respond to the feedback		
4.4.1	 Once the complaint is investigated (if required) and staff members / areas consulted as required, provide a written response to the individual who lodged the complaint. The response should: 	Assigned Officer	
	 Provide information about what the Institute did in response to the feedback and what the outcome was, including any changes that madeor intended to be made, subject to confidentiality; 		
	 Provide reasons for decisions made as a result of the feedback; 		
	 Apologise where mistakes have been made and explain the steps that will be taken to remedy the mistake; and 		
	 Tell the person what their options are to request an Internal Review or seek External Review as per 4.7 and 4.8. 		
	 In some cases, it may be prudent to phone or organise a Teams Call with the individual. The individual should be given the option of a support person if required. Even if the complaint is resolved over a call, it is still a requirement to provide a formal written response to close out the complaint. 		
	 To help guide written complaint responses and to troubleshoot common scenarios, refer to the Communications Templates. 		

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No.	Phases and steps	Name of role who actions
4.4.2	According to the Feedback Policy, most complaints should be resolved within 10 days. The following timescales should be adhered to:	Assigned Officer
	10 days or earlier:	
	• Tell a person if their feedback will take longer than 10 business days to respond to, why and when they can expect to receive a further update.	
	At reasonable intervals and at least monthly	
	 Provide updates at reasonable intervals; tell the person when they can expect to hear from you and what the process looks like. 	
	21 days (Ombudsman Guidelines for Complaint Management):	
	Respond to complaints within 21 days.	
	 Decide at 21 days whether escalation is needed to the Governance, Risk and Compliance (GRC) Team. 	
	 If a complaint remains unresolved at 21 days after submission, advise student that they can request an internal review. 	
	Auto-notification for complaints	System Generated
	• If a complaint is not resolved within 10 days, automatic notifications will be sent to the allocated officer and Governance Risk and Compliance (GRC team will also be notified). Notifications will be re-sent 10 days later until the complaint is marked as complete.	
	• You may contact GRC for support and guidance at any stage during the handling of the feedback.	
4.5	Complete the Feedback and Evaluation Tool	

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5.1	Complete a	Il mandatory fields in the feedba	ck and evaluation tool.	Assigned Officer
	Attach the r	esponse provided to the complai	nant to the bottom of the tool.	
		ovides an official log of the feedl uous improvement.	back and provides insights to	
	provider and a public	back against our expectations c sector entity. Staff assessing fe dently assess the merits of the fe	edback may use the following	
	Legal expectations:	Consider related legislative and policy obligations in reviewing the decision, action or practice under review and deciding whether escalation is needed internally.	BKI's decision, action or practice did not /did meet its legal expectations.	
	Reasonableness	Consider whether the decision, action or practice under review reflects common sense and flexibility to individual needs – for example, disability, exceptional circumstances.	BKI's decision, action or practice did not / did reflect common sense or flexibility to individual needs– for example, disability, exceptional circumstances.	
	Human rights, accessibility and equity	Consider whether any human rights are engaged or whether the decision, action or practice could reflect discriminatory, inequitable or inaccessible practices. Consider applicable policies and procedures.	BKI's decision, action or practice was incompatible / compatible with rights set out under the <i>Charter of Human Rights and</i> <i>Responsibility Act 2016</i> (Vic) or could / could not be perceived as discriminatory, inequitable or inaccessible.	
	Procedural requirements	Consider the steps BKI is required (by law, regulation or policy) to take when making a decision, action or undertaking practice like the one under review, and whether any steps were taken that is outside of the process.	BKI's decision, action or practice did not / did reflect procedural requirements or steps were taken outside of established processes.	

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No.	Phases and steps			Name of role who actions
4.6	Service delivery / Communication	Consider: • the way a decision was made and the way we made a decision /took action • whether the decision/action was appropriately communicated and people impacted by the decision were offered an opportunity to provide feedback or comment as appropriate • whether BKI was open to feedback • whether action taken by BKI was proportionate, necessary and appropriate in the circumstances.		
4.6.1	 favour of the action and a state of the action and a state of the result of t	ne person who made the con advise the person who made the s an investigation that resulted asures to correct the problem rs. eedback and Report Details ch lists types of rectification ar modification to policy or pro- ual remedy to affected person n or corrective actions should	in corrective actions, implement at root cause and notify relevant Tool Evaluation and Decision ctions including: process review, cedure, training and counselling	Assigned Officer

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No.	Phases and steps	Name of role who actions	
4.7	Internal Reviews / Escalated Complaints		
4.7.1	Requesting an Internal Review:	The person who made the	
	A person who has made a complaint can request an internal review of the if:	complaint	
	• They are dissatisfied with the decision made as a result of a complaint; or		
	 They consider they have not received a progress update within a reasonable period. 		
	Requests for internal review can be made by contacting the Office of the Chief Executive Office or expressing this request to a BKI staff member.		
	A person requesting an internal review should make clear <i>why</i> they consider the person who considered their feedback has made the wrong decision.		
4.7.2	Referring requests for Internal Review:	Office of the	
	Requests for internal reviews are referred to GRC.	CEO / Original Assigned Officer	
4.7.3	Assessing requests for Internal Review:	Head of	
	Determines or delegate the determination of whether:	Governance, Risk and	
	• An internal review is not necessary because the original complaint handling process is underway or a complaint handling process has not yet been initiated; refer the request to the relevant area for frontline resolution or investigation; or	Compliance or delegate	
	 An internal review is not needed by the allocated officer should take further action; or 		
	An internal review is needed.		
4.7.4	Allocating internal reviews	Head,	
	• Where internal reviews are conducted, they are allocated to an independent decision-maker who was not originally involved in the initial decision to which the complaint relates. This could be a GRC representative, different business unit or a different person within the same business unit that the complaint relates to.	Governance Risk and Compliance	
	Where appropriate, Governance Risk and Compliance facilitates an internal review in response to a regulator enquiry		

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No.	Phases and steps	Name of role who actions
4.7.5	Conducting internal reviews:	Internal
	The Internal Reviewer considers whether the original decision-maker:	Reviewer
	 identified and addressed all relevant issues and obligations; 	
	 sought and considered appropriate information; 	
	applied relevant obligations, policies and procedures;	
	made the correct decision; and	
	• adequately explained the decision to the person with the complaint.	
	At the end of an internal review, the Internal Reviewer may recommend:	
	 reallocation of the complaint to the same or a different person for further action 	
	internal escalation of an issue	
	no further action is needed.	
4.7.6	Separate to internal reviews of a specific complaint, GRC may undertake an internal review of a complaint theme following insight analysis. GRC may conduct the review by interviewing staff and formulating a report that examines root causes and provides recommendations/actions.	GRC representative

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No.	Phases and steps		Name of role who actions
4.8	External Complaints		
4.1	The following organisations can receive comp	Allocated Officer	
	Organisation	Details	
	Institute decisions and actions, Human Rights	https://www.ombudsman.vic.gov	
	Victorian Ombudsman	<u>.au/complaints/</u>	
	Vocational Education & Training Programs	enquiries@asqa.gov.au	
	Australia Skills & Quality Authority (ASQA)		
	Overseas students, VET Student Loans	ombudsman@ombudsman.gov.	
	Commonwealth Ombudsman	au	
	Consumer issues (marketing and sales)	https://www.consumer.vic.gov.a	
	Consumer Affairs Victoria	u/contact-us	
	Victorian Department of Education & Training	www.skills.vic.gov.au	
	Discrimination and equal opportunity Australian Human Rights Commission	https://humanrights.gov.au/com plaints/make-complaint	
	Victorian Equal Opportunity and Human Rights Commission	https://www.humanrights.vic.gov .au/get-help/contact-us/	
	Terms and conditions of employment	https://www.fairwork.gov.au/cont	
	Fair Work Ombudsman	act-us	
	Privacy and Information	https://ovic.vic.gov.au/about-	
	Office of the Victorian Information Commissioner	us/contact-us/	
	Corruption	https://www.ibac.vic.gov.au/	
	Independent Broad-based Anti-corruption Commission		
	Democratic principles, Institute performance,information about academic achievement, minimum Child Safe Standards	<u>https://www.vrqa.vic.gov.au/Pag</u> <u>es/contact.aspx</u>	
	Victorian Registration and Qualifications Authority		

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No.	Phases and steps	Name of role who actions
4.9	Reporting and Monitoring	
4.9.1	GRC generates a quarterly report, with input from the Performance and Reporting team for the Executive team. This includes qualitative and quantitative insights on key themes and outcomes to inform opportunities for continuous improvement.	GRC representative Business Insights Lead

5.0 Roles and Responsibilities

Role	Responsibilities
Assigned Officer	Assess and respond to the Feedback in consultation with relevant stakeholders. Communicate with the person who provided the feedback throughout the process
Head of Governance Risk and Compliance	 In conjunction with their team: Oversees the implementation of the policy; Triage the feedback to Allocated Officer and allocates internal reviews and investigations; Provides guidance and support on complaint resolution and process; Develops business tools to support compliant resolution and continuous improvement; and Facilitates thematic reporting and insights. Engages independent external reviewer and activates alternative dispute resolution processes, as relevant.
Head of Brand and Marketing	Ensure policy and procedure available through publication in both the Student Handbook and on the Institute's websites:
Senior Leadership Team	 Oversee the consideration and resolution of escalated or complex complaints. Drive feedback culture throughout the Institute.

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6.0 Definitions

Word/Term	Definition			
Assigned Officer	The BKI staff member assigned to manage and respond to the feedback.			
ASQA	Australian Skills Quality Authority (ASQA) is the national regulator for Australia's vocational education and training (VET) sector. ASQA accepts complaints and feedback about training providers from students and all members of the community. https://www.asga.gov.au/students/complaints			
Complaint	 An expression of dissatisfaction with: the quality of an action taken, decision made, or service provided by the Institute, anyone under the Institute's oversight or an Institute contractor. 			
	a delay or failure in providing a service, taking an action, or making a decisi by the Institute or an Institute contractor.			
Compliment	An expression of praise or satisfaction with the quality of experience or service provided by the Institute.			
External Review	When the Institute responds to feedback, it provides the person who provided the feedback with information about their rights of appeal and/or review by external authorities including the Victorian Ombudsman and Australian Skills Qualification Authority (ASQA).			
Feedback	Information about reactions to a product, a person's performance of a task which is used as the basis for driving improvement. Feedback can come in the form of complaints or compliments.			
FrontlineComplaint is straight forward and resolved immediately by the AlloResolutionwithout the need to investigate/consult further.				
	Frontline resolution is generally used where the concerns represented are simple, non- contentious, and/or do not require the Institute to prove or disprove an allegation that relates to the reputation of a person or the Institute. Most complaints about the administrative application of policies, procedures or service delivery are appropriate for frontline resolution.			
GRC	Governance, Risk and Compliance. GRC oversee the governance of the Institute's Feedback program.			

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Word/Term	Definition		
Internal Review	Internal Review refers to the process of independent review over the way an issue has been handled, including the way a complaint has been assessed and responded. This process is generally available after feedback has been considered and responded to or where there is a delay in addressing feedback.		
Investigation	An internal investigation may be required where feedback presents complex or sensitive. Investigations are reserved for more serious types of complaints, such as those that relate to the health, safety and wellbeing of people or the conduct and reputation of individuals. Case by case assessments are conducted to decide if an investigation is needed.		
Natural Justice	The 'fair hearing' and 'no bias' rules: all parties must be given the opportunity to present their case, be fully informed about allegations and decisions made and have the right of representation by another person. A decision-maker in relation to their grievance should have no personal interest in the matter and should be unbiased in their decisions.		
Procedural Fairness	By providing feedback, a person has the opportunity to share their experience and concerns. BKI commits to considering all feedback in good faith and being open to receiving and learning from feedback. Before making a decision, the allocated officer considers all relevant information.		
Victorian Ombudsman	The role of the Victorian Ombudsman is to keep government and public organisations accountable. They do this by investigating complaints about government, the conduct of officials, or broad areas of public interest. Their aim is to improve public administration and decision making. https://www.ombudsman.vic.gov.au/complaints/		

7.0 Related Documents

Document Name
Feedback Procedure (Compliments and Complaints)
Feedback and Report Details Tool
Fees Charges and Refunds Policy
Employee Code of Conduct Policy
Online Feedback Form

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Document Name	
Speak Up Policy	
Student Code of Conduct Policy	
Student Welfare and Accessibility Policy	

8.0 Version Control and Change History

Ver.	Issue Date	Document Custodian	Description of Change	Approval Authority
1.1	18/07/18	Manager, Academic Governance and Quality	Link to Student complaints and Grievance Policy and minor update of changes	CEO
1.2	13/11/18	Manager, Academic Governance and Quality	Minor change of reference to Appeals Panel rather than Committee to align with policy.	Executive Director – Education Services
1.3	10/12/18	Manager, Academic Governance and Quality	Minor change to clarify the costs associated with complaints and link to forms on the website.	Executive Director – Education Services
2.0	28/08/19	Chief Academic Officer	Include appeals to VRQA and include students in corrections facilities.	Board of Studies
2.1	5/02/2020	Chief Academic Officer	 Include international Student Complaints and Appeals Board of Studies 	
3.0	19/08/2021	Chief, Governance and Quality Officer	Aligned procedure to Feedback Framework 2021.	Chief, Governance and Quality Officer

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Ver.	Issue Date	Document Custodian	Description of Change	Approval Authority
4.0	25/06/2024	Head Governance, Risk and Compliance	Realigned procedure to the new template.	Chief Operating Officer
			Procedure flow and content adjusted to reflect current practice.	
			Update of roles and responsibilities within procedure flow to reflect current state.	
			Updated table 4.2.1 to describe how feedback is triaged to align to current organisational design state.	
			Updated content to include email notification process for unresolved complaints post 10 days.	
			Updated Roles and Responsibilities, Definitions and Related Documents.	

Document Custodian and Approval Authority 9.0

Document Custodian	Approval Authority	Approval Date	Scheduled Review Date
Head of Governance, Risk and Compliance	Chief Operating Officer	24/06/2024	24/06/2026

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