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## COMPLAINTS AND FEEDBACK PROCEDURE

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Endorsing Policy	Student Grievance Management Policy
Procedure Owner	University Registrar
Contact Officer	Chief Integrity Officer
Approval Authority	University Registrar
Date of Next Review	December 2025

## 1. PURPOSE AND OBJECTIVES

This Procedure articulates Bond University's <u>Feedback</u> and <u>Complaint</u> reporting and Resolution processes, with the aim of facilitating <u>Resolution</u> at the most appropriate level and at the earliest opportunity. This document is linked to the <u>Student Grievance Management Policy</u>.

Bond University is committed to the provision of quality services to the <u>Bond Community</u> and to demonstrating civic leadership and welcomes Feedback as a method to identify best practice as well as opportunities for growth and development. Similarly, through the active management of Complaints, Bond identifies inconsistencies between stakeholder expectations and the standard of service promised and/or provided by the University, its education agents, or any related party with whom the University has an arrangement to deliver a student's program or related services. This information can be used to instigate preventative strategies to reduce recurrence and to undertake targeted continuous improvement.

Accordingly, this Procedure:

- outlines the steps involved in providing Feedback or making a Complaint;
- explains the processes for managing Complaints in an equitable and timely manner; and
- describes the expectations and responsibilities of parties engaged in the University's Complaints management process.

## 2. AUDIENCE AND APPLICATION

This Procedure applies to all members of the Bond Community and the wider public, except in respect of matters outside the University's remit including Complaints involving the Bond University Student Association (BUSA).

Although a University staff member may be named in a Complaint, a Complaint made in accordance with this Procedure is a Complaint about the University.

Bond University adheres to the 'no wrong door' principle of Complaint management and Complaints that are outside the University's areas of responsibility will be resolved by referring a <u>Complainant</u> to the correct Complaint pathway.

## 2.1. Time Limits

- 2.1.1. A person must take all reasonable steps to register their Complaint concerning a particular decision, act or omission of the University, with the University within 12 months of its occurrence.
- 2.1.2. Time limits for lodging a Complaint do not apply where there is an obligation placed on the University to report or deal with the subject matter of the Complaint once the University becomes aware of it.
- 2.1.3. In all other cases, Complaints made outside of the above referred period may be accepted by the Office of Integrity provided a compelling case is advanced by the Complainant as to the magnitude of the Complaint and the reason for the delay.
- 2.1.4. The Office of Integrity will notify the Complainant in writing of its decision to accept or not accept a Complaint outside of the above referred period.

. ROLES AND RESPONSIBILITIES	
Role	Responsibility
University Registrar	<ul> <li>Reviews Complaint outcome</li> <li>Makes a determination as to whether a matter is frivolous or vexatious</li> <li>Determining the correct or intended interpretation and scope of this Procedure</li> <li>Decides cases where an issue is not clearly dealt with in this Procedure</li> </ul>

## 3. ROLES AND RESPONSIBILITIES

Chief Integrity Officer	<ul> <li>Delegate of the University Registrar</li> </ul>
Provost	Reviews Complaint outcome
Vice President, Operations	
Vice President, Engagement	
Vice President, Future Students	
Director, Human Resources	
Executive Dean of Faculty or Head of University	<ul> <li><u>Respondent</u> or reviews Complaint outcome</li> </ul>
Academic Unit (UAU), or delegate	
Associate Dean (Student Affairs & Service Quality),	Respondent
or equivalent	
Director, Bond International	
Director, Brand & Marketing	
Director, Brisbane	
Director, Campus Life	
Director, Domestic Recruitment	
Director, Engagement & Development	
Director, Facilities Management	
Director, Industry Engagement	
Director, Information Technology Services	
Director, International	
Director, Microcredential Unit	
Director, Office of Learning & Teaching	
Director of Planning	
Director of Research Services	
Director of Sport	
Director, Student Business Services	
Director, Student Success & Wellbeing	
Faculty Business Director, or equivalent	
Head of Alumni Relations	
Head of Engagement Services	
Head of News & Public Relations	
Manager, Admissions Transformation	
Manager, Institutional Partnerships	

## 4. SUPPORT FOR STUDENTS

It is recognised that students accessing this Procedure may require personal support. Bond University offers advice and support tailored to individual student needs. This may include academic support, counselling support, assistance with welfare issues, and referrals to off-campus support programs. Access to such support is available to students whether or not a Complaint is lodged. Students are encouraged to contact the Student Success & Wellbeing Team for a confidential and free consultation to identify the advice and support required. A comprehensive list of services that are available can be accessed <u>here</u>.

A student may seek the assistance of BUSA's Student Advocacy services to navigate any stage of the <u>Complaints</u> <u>Process</u> and may be accompanied by a Student Advocate or other support person (not acting as legal counsel or solicitor) at any stage of the Complaints Process. Where the student intends to bring an accompanying person with them, they should provide advance notice to the Respondent or <u>Reviewer</u> of this. While the University encourages students to advocate for themselves, at the discretion of the Respondent or Reviewer, a Student Advocate or other support person may assist the student in articulating a component of their response.

## 5. FEEDBACK

Bond University is always striving to improve its processes and service delivery. Any compliments or constructive comments are welcome as part of this process. The University will:

- acknowledge the Feedback upon receipt;
- forward the Feedback for consideration by the relevant area;
- use the Feedback provided to inform continuous improvement; and
- report on any themes or trends as part of the Feedback/Complaints reporting process.

Feedback on the part of students enables the University to continuously improve. Current students also have the opportunity to provide Feedback through Class Representatives, teaching evaluations (eTEVALs) and intermittent surveys.

## 6. COMPLAINTS

A Complaint is an expression of dissatisfaction about something Bond University has done or not done, or about the standard of service provided by or on behalf of the University. From the perspective of students, a Complaint

can be about any aspect of student life (including teaching and learning opportunities, assessments, the behaviour of other students or staff members, facilities or equipment, and support, advice or accommodation services) or in relation to the University's policies, procedures or decisions.

Any person may make a Complaint about matters arising from the operations of Bond, including any aspect of an individual's experience with the University's agents or related parties.

The preferred method of contact is for the Complainant to lodge their Complaint with the University via the online Complaints Portal. Alternatively, Complaints may be lodged with the Office of Integrity in person, or by email (<u>integrity@bond.edu.au</u>); in these cases, the Office of Integrity will register the Complaint in the Complaints Portal on behalf of the Complainant. For people with a disability, the Office of Integrity provides various accessibility options to assist in the lodgement process. In all cases, the Office of Integrity will process the Complaint in accordance with this Procedure. The University is committed to the creation of an environment where everyone is treated fairly and with respect, and free from unlawful discrimination.

## 6.1 Informal Resolution

Complainants are encouraged, in the first instance, to seek Resolution of their concerns directly with the person or service area involved (e.g., through discussion, meetings), if they believe it is appropriate to do so and they are able, willing and feel confident in approaching the relevant person(s).

In many cases, problems can be resolved through informal enquiries, discussion and clarification. Prompt Resolution may be more likely to occur where the problem has arisen from a misunderstanding or error that can be rectified easily.

For concerns relating to a subject in which a student is currently enrolled, students may prefer to contact the Class Representative for that subject (where one is designated). For any concern within the <u>Faculty</u> or UAU of study, students may contact the Associate Dean or Manager, Student Affairs & Service Quality (or equivalent). For general University concerns, or for assistance in identifying the relevant person or area to approach, students may contact Student Assist (<u>studentassist@bond.edu.au</u>).

#### 6.2 Formal Complaints

If a Complaint cannot be resolved informally, or the Complainant is unwilling or does not feel confident in approaching the person or service area involved, the Complainant may elect to pursue a formal Complaint.

6.2.1 A formal Complaint must be in writing and should include the following details:

- the nature of the Complaint;
- the timelines for events pertinent to the Complaint;
- what action has been taken to resolve the matter to date;
- the evidence available to support the Complaint;
- the outcome/remediation the Complainant is seeking; and
- additional support material to explain special circumstances not raised previously (see clause 2.1 above).
- 6.2.2 The Complaint will be actioned in the form in which it is received. It cannot have any personal information modified or removed to protect the identity of the Complainant.
- 6.2.3 Upon lodgement with the Office of Integrity, the Complaint will be promptly directed to the Respondent who the Office of Integrity considers is best placed to deal with the Complaint.
- 6.2.4 If the subject matter of a Complaint is brought to the attention of or is dealt with by a Respondent without it first being lodged with the Office of Integrity, the Respondent will, as soon as is practicable, lodge that Complaint via the online Complaints Portal.

#### 6.3 Formal Resolution

- 6.3.1 The Respondent and any other person involved in investigating or responding to a Complaint will do so on behalf of the University.
- 6.3.2 Subject to clause 6.3.3, on being made aware of a Complaint (via an Office of Integrity Complaint notification or through other means), the Respondent will:
  - within five <u>Business Days</u>, contact the Complainant to acknowledge receipt of and ownership for resolving the Complaint; and
  - within ten Business Days, commence addressing the Complaint.

- 6.3.3 If the Respondent, once in receipt of the Complaint, is of the view that:
  - they are not the most appropriate person to deal with the Complaint; or
  - they would be in breach of clause 4.10 Conflicts of Interest of the (Staff) Code of Conduct Policy in dealing with the subject matter of the Complaint or the Complainant;

they must not engage any further in the process and should immediately advise the Office of Integrity of the situation and request that the matter be delegated to a more appropriate <u>University Officer</u>.

- 6.3.4 In investigating a Complaint, the Respondent (or Reviewer):
  - will consider the cases made by both the Complainant and the other relevant person/s involved (or seek information from the latter), and may invite the parties for individual meetings;
  - will examine relevant documentation and policy and procedures;
  - may seek clarification from relevant parties on information received and
  - may seek internal advice, including legal advice from the University's General Counsel or otherwise as appropriate, or advice from external agencies.
- 6.3.5 The Respondent will come to an informed decision on the merits of the Complaint and the most appropriate course of action, as soon as is practicable. The Respondent's decision:
  - may find in favour of the Complainant with one or more remediations, which may or may not be the same as that requested by the Complainant;
  - may find against the Complainant; and/or
  - may be a determination that the Complaint is frivolous and/or vexatious.

Any of the above options may also include recommendations for improved process or policy/procedure review.

- 6.3.6 The Respondent will consider and manage the wider effects that a Complaint may have on the workplace beyond its Resolution.
- 6.3.7 Once the Respondent has decided in relation to the Complaint, they will formally:
  - notify the Complainant of the steps taken to address the Complaint, the outcome of the Complaint, detailed reasons for the outcome and options for review of the outcome, and will disclose as much information about the Complaint's Resolution as the privacy and confidentiality of affected parties permit; and
  - advise the Office of Integrity of the Complaint's closure, providing all relevant supporting documentation associated with the Complaint's Resolution.

## 6.4 Indicative Timeframes

Refer to Schedule A: Complaints – Summary of Timelines.

The Respondent will aim to complete the formal Resolution phase within 20 Business Days of receipt of the Complaint. However, this may not always be possible, particularly where the matter involves a number of parties and/or the circumstances are complex. Updates on the progress of the investigation will be provided to the Complainant by the Respondent, and all parties will be informed as soon as possible of any significant delays and advised if alternative timeframes are to apply.

## 6.5 Review of Complaint Outcome

Following receipt of an outcome to their formal Complaint, a Complainant may escalate the Complaint and submit an application for review.

In requesting a review of a formal Complaint outcome, the Complainant is required to provide a clear rationale as to why they believe the original outcome to be incorrect and attach copies of all relevant documentation. If the Complainant appears to have no reasonable grounds, or lacks appropriate evidence to support the review, the University will advise the Complainant within five Business Days that their application cannot be progressed unless further information is provided. It will not be sufficient for the Complainant to assert circumstances or changes to circumstances without evidence to substantiate or support their claim.

An application for review must be submitted to the Office of Integrity (<u>integrity@bond.edu.au</u>) within 20 Business Days of the formal Complaint response. All review applications will be acknowledged within five Business Days of receipt. If the application is progressed, it will be directed to the Reviewer who the Office of Integrity considers is best placed to review the Complaint. The Complainant will be kept informed of the progress of the review submission at regular intervals.

The outcomes of an application for review may include one or more of the following actions:

- upholding in its original form the previous outcome;
- recommending an alternative action to assist with the Resolution of the Complaint; and
- recommending actions and improvements to the responsible officer of the University to address systemic issues arising from the review of the Complaint.

The outcome letter will outline:

- the process of review followed by the Reviewer;
- detailed reasons for the outcome;
- advice about options to seek an external review (if available); and
- support services available to student Complainants (if applicable).

#### 6.6 Confidentiality

The University will maintain confidentiality relating to the management of Complaints in accordance with the Privacy Policy. Information and records about a Complaint will be kept confidential and will only be divulged to staff of the University with direct involvement in the process (in accordance with this Procedure) and those to whom it is necessary to enable proper investigation of the matter. However the University may divulge records about a Complaint to legal advisers or insurers and where any of the following apply:

- where there is risk of harm to a person or persons, it may be necessary to divulge records of and details about the Complaint to other Bond staff members and relevant external agencies such as the police;
- where the University is required by law to produce the records, for example, to a court or tribunal for the purpose of legal proceedings by way of subpoena or a similar compulsory process; and/or
- where there is a clear public interest or obligation to share information (such as a duty to disclose information to a professional accreditation board, or a duty to report under legislation).

Where the outcome of a formal Complaint is sent for review, the Complainant and the Reviewer will be provided with copies of all material considered relevant by the Respondent in making their decision, except for material which is subject to legal professional privilege or material that must be withheld as a result of the University's legal obligations to other parties.

#### 6.7 Withdrawal of Complaints

At any stage a Complainant may decide to withdraw a Complaint. Where the process of formal Resolution is underway, any withdrawal must be in writing (this may be by email). In most instances Bond University will then deem the Complaint resolved. However, in certain circumstances, the University may deem the Complaint serious enough for an internal investigation to continue or for referral to an external agency.

#### 6.8 Anonymous Complaints

An anonymous Complaint will be addressed in accordance with this Procedure, with the exception that there is no requirement to identify or notify the Complainant.

Action taken in relation to anonymous Complaints may be limited where further information from the Complainant is required to sufficiently investigate and determine appropriate Resolution.

## 6.9 External Complaints

A person may make a Complaint to an appropriate independent external body or tribunal at any time. A full list of these agencies and their contact details is available on the Office of Integrity webpage – External Complaint Mechanisms and can also be found in the External Review and Complaints Procedure. A majority of external agencies encourage applicants to attempt to follow internal Complaint Processes before undertaking this step.

The University may choose to suspend addressing a Complaint until the external body or tribunal rules on the Complaint, or the external Complaint is directed back to the University for Resolution.

6.9.1 The University recognises that there may be situations where a Complainant is:

- not satisfied with the outcome reached in relation to their Complaint; and/or
- of the view that their Complaint has not been handled properly or fairly in accordance with this Procedure.

In such cases, the Complainant has a right to raise a new Complaint, identifying where the University's processes have not been complied with. The Complainant can also refer the University's handling of their Complaint to an appropriate independent external body or tribunal.

6.9.2 Where requested, the Office of Integrity will advise the Complainant in relation to these agencies and their roles.

## 7. UNACCEPTABLE AND UNREASONABLE CONDUCT BY COMPLAINANTS

- 7.1 Complainants are personally responsible and liable for the content of their Complaints.
- 7.2 Complainants must not provide information that they know to be inaccurate or misleading.
- 7.3 If a Respondent believes a Complainant is exhibiting unreasonable behaviour, they will contact the Office of Integrity for advice in the first instance. Unreasonable conduct by Complainants may include:
  - aggressive, rude or threatening behaviour, including the use of offensive or abusive language in communications;
  - insisting on unreasonable or unattainable outcomes;
  - issuing instructions and making demands about how a Complaint should be managed;
  - withholding information, misquoting others or selectively disclosing information, including making serious allegations and then declining to provide further information or evidence about the allegations;
  - changing the substance of an existing Complaint or re-phrasing allegations while the Complaint is being managed;
  - refusing to provide further clarification of issues raised upon request, particularly where large amounts of information are presented as part of the Complaint; or
  - repeatedly emailing or calling the University despite being advised not to do so because the subject matter of their Complaint is currently being dealt with or has already been dealt with and resolved.
- 7.4 The University may restrict access to its Complaints service for Complainants who act unreasonably.
- 7.5 The University Registrar (or delegate) will inform the Complainant in writing that they have deemed the Complainant's conduct to be unreasonable and the University will therefore not be processing it further.

## 8. PROTECTING PARTIES TO A COMPLAINT

- 8.1. It is a breach of this Procedure to threaten, intimidate, harass or victimise any party who makes, is responsible for or assists in the Resolution of, or is the subject of, a Complaint. Any such behaviour may result in disciplinary action (against students) or, in extreme circumstances, be reported to the appropriate external regulatory body or the police.
- 8.2. The University acknowledges that a Complaint that appears to lack plausibility, or after investigation is not substantiated, is not necessarily false. A Complaint that is not upheld does not imply the Complaint was not made in good faith and that an avenue is automatically created for the Respondent, the University or anyone else to take reprisal action against the Complainant. However, this does not preclude any individual from lodging a legitimate Complaint against another individual at a later time.
- 8.3. The University recognises the power imbalance, in particular, between students and staff, and between staff and their manager, which may provide opportunities for reprisals to be taken against Complainants in ways that may be difficult to expose. In such cases, the University may take steps to prevent disadvantage to a Complainant as a result of them making a Complaint in good faith. These necessary steps may include, among other things, temporarily physically relocating an individual, changing reporting lines, or assigning a different academic educator or supervisor to a student.

## 9. MONITORING AND ASSURANCE

The University Registrar will monitor the occurrence and nature of formal Complaints received to identify if systemic issues exist across the University. The Office of Integrity will produce an annual report, to be submitted to Council via the University Management Committee, which analyses relevant data and trends (including systemic issues) and identifies where, because of either Complaints or Feedback, changes to policy or procedure have occurred.

The University Registrar will periodically review the volume of Complaints received by the University and the timelines for processing these Complaints through the University's Complaints management system. Statistics and trends will be reported back to relevant areas to facilitate continuous improvement.

## 10. RECORD KEEPING

All files relating to Complaints will be retained and disposed of in accordance with University and statutory requirements. This includes a regulatory obligation to keep appropriate records of all Complaints for at least 5 years, and allow the parties to a Complaint appropriate access to the records of that matter.

## 11. DEFINITIONS, TERMS, ACRONYMS

Bond Community	Means current students (enrolled and visiting), alumni, staff, other workers, volunteers, official visitors, recognised individuals, honorary position holders, adjunct academic and support position holders, suppliers of academic placements or official suppliers of academic-related activity, and anyone else contractually bound to comply with this Procedure.
Business Days	Days falling from Monday to Friday from 8:30am to 5:00pm excluding public holidays.
Complaint	An expression of dissatisfaction about something Bond University has done or not done, or about the standard of service provided by or on behalf of the University.
Complainant	A person who has made a Complaint.
Faculty	Bond Business School, Faculty of Health Sciences & Medicine, Faculty of Law, and Faculty of Society & Design (each of which is headed by an Executive Dean).
Feedback	A compliment, criticism, comment or suggestion where a response is neither sought nor reasonably expected.
Resolution	The determination which is achieved when the relevant decision maker (Respondent or Reviewer) has acted in accordance with this Procedure in addressing a Complaint.
Respondent	The University Officer responsible for dealing with a Complaint.
Reviewer	The University Officer responsible for reviewing the outcome of a Complaint.
University Academic Unit (UAU)	Bond University College (headed by the Director) and Transformation CoLab (headed by the Assistant Provost).
University Officer	An employee of Bond University.

## 12. AFFILIATED PROCEDURES AND SCHEDULES

<u>Schedule A</u>: Complaints – Summary of Timelines <u>Complaints Process</u>

## 13. RELATED DOCUMENTS

**Bond University Student Charter** Class Representatives Policy (TL 3.6.2) Education Services for Overseas Students (ESOS) Act 2000 ESOS National Code 2018 Higher Education Standards Framework 2021 Higher Education Support Act 2003 Higher Education Support (Student Services, Amenities, Representation and Advocacy) Guidelines 2022 Privacy Policy (INF 6.5.1) Research Misconduct Policy (RES 4.5.5) Sexual Harm Policy (SS 5.8.3) Code of Conduct (HR 4.8.4) (Staff) Student Code of Conduct Policy (SS 5.2.1) Student Evaluation of Teaching Policy (TL 3.4.4) Student External Review Procedure Student Fees, Charges and Refunds Policy (SS 5.7.4) Student Grievance Management Policy (SS 5.8.1) Support for Students' Policy (SS 5.8.2) Student Wellbeing and Safety Policy (SS 5.8.4) Student Review and Appeals Procedure **Review of Results Procedure** 0 Appeals against Academic Exclusion Procedure 0

Appeals against Findings of Misconduct Procedure

Survey Policy (GOV 1.6.5)

## 14. MODIFICATION HISTORY

Date	Sections	Source	Details
November 2024	10	Special Advisor University Governance	V2.1: Enhanced alignment with HESA 2003
3 August 2023	All	CIO	V2: Amended so that the Policy now covers all members of the Bond Community and the wider public
19 December 2022			Date First Approved - Regulations to Procedure

## **COMPLAINTS – SUMMARY OF TIMELINES**

If other timelines apply under a specific policy or procedure, they will take precedence over the general provisions in this Schedule.

Action	Responsible party	Timeframe
Lodge formal written Complaint	Complainant	Within 12 months of the action, incident or event
Commence process to resolve	University	Within 10 Business Days of receipt of Complaint
Finalise and advise outcome	University	*Normally within 20 Business Days of receipt of Complaint
Application for Review of Complaint		
Action	Responsible party	Timeframe
Lodge formal written application	Complainant	Within 20 Business Days of receipt of Complaint outcome notification
Commence process to resolve	University	Within 10 Business Days of receipt of request for review of Complaint
Finalise and advise outcome	University	*Normally within 20 Business Days of receipt of request for review of Complaint
External Review		
Action	Responsible party	Timeframe
Lodge Complaint with domestic Student Ombudsman	Complainant (Students only)	In accordance with the process set by the External Review Procedure
Lodge Complaint with an external agency other than the domestic Student Ombudsman. For example:	Complainant	In accordance with the process set by the relevant external agency
<ul> <li>Commonwealth Ombudsman (for international students)</li> <li>Office of the Information Commissioner</li> </ul>		

\*The University recognises that, in order to ensure an equitable outcome is achieved, complex issues involving may take longer to resolve. In such circumstances, an extension to these timelines may be approved by the University Registrar.

# **The Complaints Process**

