

COMPLAINTS AND APPEALS POLICY

1. Purpose

- 1.1 This document applies to the Brunswick Institute, its courses, its clients (students) and its controlled entities (collectively "BI", "Institute", "the Institute", "we", "us", "our"), and students.
- 1.2 This policy outlines the Institute's compliance with Standard 8 of the National Code 2018, which requires international students to complete their courses within the expected duration specified on the CRICOS register and detailed in their Confirmation of Enrolment (CoE).

2. Definitions

- 2.1 An education agent refers to an entity (in or outside Australia) that
 - i. Engages in any of the following activities in relation to a provider:
 - A. The recruitment of overseas students, or intending overseas students;
 - B. providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment;
 - C. otherwise dealing with overseas students, or intending overseas students; and
 - ii. is not a permanent full-time or part-time officer or employee of the Institute.
- 2.2 Agent Agreement refers to the agreement between the Institute and the agent, including the schedules.
- 2.3 CRICOS refers to the Commonwealth Register of Institutions and Courses for Overseas Students.
- 2.4 ESOS Act refers to the *Education Services for Overseas Students Act 2000 of the Commonwealth of Australia*.

- 2.5 National Code refers to the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*.
- 2.6 Prospective student/applicant/client refers to a person who intends to become, or who has taken any steps towards becoming, an 'overseas student' or 'intending overseas student' as defined by the *ESOS Act*.
- 2.7 DHA refers to the Department of Home Affairs.
- 2.8 OSHC refers to the Overseas Student Health Cover.
- 2.9 eCoE refers to the electronic Confirmation of Enrolment.
- 2.10 PRISMS refers to the Provider Registration and International Student Management System.
- 2.11 VET refers to vocational education and training.
- 2.12 2025 Standards for RTOs refers to the *National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025*.

3. Policy

- 3.1 The Institute delivers Vocational and ELICOS courses in consultation with the Academic team and industry representatives.
- 3.2 Course duration is set, and approval obtained through the regulator.
- 3.3 The Institute does not provide any distance or online learning for international students.
- 3.4 The Institute monitors international students' course progress (for VET Courses) and attendance monitoring (for ELICOS Courses) to assist them in completing their course within the expected course schedule as stated on their CoE.
- 3.5 The Institute provides support in accordance with the Student Support Policy to assist international students in completing their courses within the expected duration.

- 3.6 Students are required to complete their course within the expected duration of study as recorded on the CRICOS register unless the circumstances listed in this policy apply.
- 3.7 The Institute continues to monitor the workload and progress of international students to ensure on-time completion of the course within the expected duration, as registered with CRICOS and specified in their CoEs.
- 3.8 A full-time student load is planned as a minimum of 20 hours of scheduled classes per week unless:
- i. Credit Transfer (CT) granted.
 - ii. Recognition of Prior Learning (RPL) granted.
 - iii. There are compassionate or compelling circumstances for reducing the load.
 - iv. The reduced load is part of the Institute's intervention strategy.
 - v. The student has studied or plans to study extra units in another study period.
- 3.9 The length of a study period varies by course. The duration of any study period, including holiday breaks, is no more than 24 weeks.
- 3.10 In each study period, students must be studying at least one unit that is not by distance or online learning.
- 3.11 The Institute may extend the duration of the student's course only in the following circumstances:
- i. On medical grounds (a medical practitioner's certificate indicating the student is unable to maintain academic performance), a deferment or suspension of study has been granted; or
 - ii. In exceptional compassionate circumstances beyond students' control, such as serious illness or death of a close family member (independent evidence of the exceptional circumstances is required), and a deferment or suspension of study has been granted, or

- iii. An intervention strategy that has been implemented, or is in the process of being implemented, for a student at risk of not meeting satisfactory course progress.
 - iv. An approved deferment or suspension of study has been granted in accordance with the Deferral, Suspension or Cancellation of Enrolment Policy.
- 3.12 Unless otherwise specified under section 4.7, the duration of study indicated on a student's Confirmation of Enrolment (CoE) must not exceed the course duration registered on CRICOS.
- 3.13 The Institute may implement an intervention strategy for students at risk of failing to meet academic progress requirements.
- 3.14 Any change to the duration of a student's course must be notified by the Institute on PRISMS and the Student Management System (WiseNet), and if necessary, a new COE issued.
- 3.15 Copies of all documentary evidence relating to the decision to change a student's eCoE are to be kept in the student administration file and recorded in the Student Management System (WiseNet).
- 3.16 A CoE for a vocational course may only be extended once, except for
- i. Compassionate or compelling circumstances supported by evidence.
 - ii. An approved deferment or suspension of study.
 - iii. An outcome of the Complaints and Appeals process.
- 3.17 A CoE for ELICOS studies may be extended more than once in accordance with 4.7 if there is evidence that the student is making some progress with their language development.
- 3.18 The Institute staff will use their professional judgement to assess each case on its individual merits with respect to compassionate and compelling circumstances. Documentary evidence must be provided to support these claims, and copies of these documents must be kept with the student's file.

- 3.19 The CEO is responsible for ensuring compliance with this policy and its associated procedures and systems.

4. Procedure

- 4.1 At the time of initial enrolment, each student will be furnished with a training program schedule (timetable) that identifies the units required to be completed in each study period to complete the qualification within the normal duration as indicated on the CRICOS register.
- 4.2 An orientation program is provided outlining the expectations for students to achieve satisfactory course progress (VET courses) and satisfactory attendance (ELICOS courses), and to complete their course within the expected duration. The consequences of not achieving satisfactory course progress and of not completing the course within the expected duration are also explained.
- 4.3 The availability of support services is communicated pre- and post-enrolment to help students complete their course within the expected duration.
- 4.4 Upon completion of each unit, student results will be entered into the Student Management System (WiseNet), and a progress report will be generated for each student after a study period to identify whose progress has fallen behind the training program schedule.

5. Procedure - monitor progress

- 5.1 Student attendance records are entered into the Student Management System (SMS) on a fortnightly basis.
- 5.2 Unit/module assessment results are entered into the Student Management System (SMS) on a fortnightly basis.
- 5.3 For VET courses, the admin team monitors course progress in accordance with the Student Support Policy.

- 5.4 For ELICOS programs, the admin team monitors attendance in accordance with the ELICOS Support Policy and Procedure.
- 5.5 The Institute implements an intervention strategy to assist students identified as at risk of not completing their course within the expected duration.

6. Procedure - student support

- 6.1 The Institute applies an intervention strategy to support students identified as at risk of not completing courses within expected timeframes.
- 6.2 Students who are identified as falling behind the training schedule may have their study schedule modified to ensure they complete it within the expected duration.
- 6.3 Strategies for assisting students to complete within the expected duration may include:
 - i. Re-assessments
 - ii. Undertaking additional units during holiday periods
 - iii. Undertaking additional units during subsequent study periods
- 6.4 Students who have their program modified are given an explanation of the necessity for this and its considerations in writing.
- 6.5 The Student Support Officer and the Academic Director monitor the effectiveness of modified programs.

7. Procedure - extending course duration

- 7.1 If, after having their program modified and/ or being placed on an intervention strategy, the student is unable to complete their course within the expected duration, the Institute will extend the duration of the CoE only in compliance with item 4.11 of this policy.
- 7.2 Students are issued a new CoE.
- 7.3 The Student Support Officer and the Academic Director monitor student progress.

7.4 Students will receive assistance in accordance with this policy, the Student Support policy, and the Defer, Suspension or Cancellation Policy.

8. Procedure - notification of intention to report

8.1 If a student will not complete their course in the expected duration and is not included in the circumstance of 4.11

- i. The student's enrolment will be cancelled.
- ii. The student will be sent a letter informing them of the Institute's intention to report them.
- iii. The student will be advised of the process for appealing against this decision via the Institute Complaints and Appeals process and informed that they have 20 working days to do so.

8.2 Students who choose to access this process will not be reported if they submit an appeal within 20 days of the letter indicating the Institute's intention to report. Students must continue to attend classes during the appeals process as specified in the Institute's Complaint and Appeals Policy.

8.3 Students who choose not to access the complaints and appeals processes within 20 days, withdraw from the process, or the process is completed and results in a decision supporting the Institute. The Institute will cancel the student's enrolment and notify the Department of Education through PRISMS that the student is not achieving satisfactory attendance as soon as practicable.

8.4 A hard copy of the PRISMS entry will be included in the student's file.

VERSION HISTORY

Version Number	Date	Summary of changes
1.0	September 2021	New policy
2.0	July 2025	Revised and updated to include the changes according to the Standards for Registered Training Organisations (2025).
3.0	December 2025	Revised and updated to include the changes according to the ESOS 2000 Act.