

Policy Name:	Complaints and Appeals Policy
RTO:	Demi International Beauty Academy (Demi International) – RTO 32542 Niche Education Group (AACDS) – RTO 51373; CRICOS 02813B Change Safety and Training (DaAT) – RTO 32466 Cairns Beauty Academy (ICQ) – RTO 1749; CRICOS 01941B
Other:	Bravura Education Aspire Training Clinics

1. Purpose

Demi Education Group (DEG) is committed to providing a safe, respectful, and inclusive learning environment for all students, and a safe and professional environment for clients and patients.

This policy outlines a fair, transparent, and accessible process for managing complaints and appeals. We welcome and value feedback from students and clients/patients, as it plays a vital role in continuously improving the quality of our training, support services, and administrative operations.

We strongly encourage any student or client who is experiencing, or has witnessed, serious misconduct - including sexual harassment, sex-based harassment, sexual misconduct, child abuse, or discrimination - to report the matter through the formal complaints process so that it can be appropriately investigated and addressed.

This policy outlines how DEG manages both:

- Complaints/Grievances – can be lodged against the organisation, related third parties, an employee or contractor hired by DEG. Circumstances of a complaint include concerns, such as enrolment, administration, marketing, finance, or service.
- Appeals – Review of a Complaint or Appeal where the outcome is dissatisfactory; or academic matters, such as assessment outcomes, course progression, or access to support services.

2. Policy Statement

Demi Education Group is committed to ensuring that all students and clients have access to a fair, transparent, and timely process for making complaints and appeals. DEG recognises the right of every student to raise concerns about their training, assessment, administration, marketing or support services without fear of disadvantage or victimisation.

Complaints and appeals will be:

- acknowledged promptly,
- managed impartially and confidentially,

- investigated with due regard to evidence and legislation, and
- resolved in a timely manner with clear communication of outcomes.

Where a complaint or appeal cannot be resolved internally, DEG will ensure students are informed of their right to escalate the matter to an appropriate external authority.

Where a complaint is in reference to serious misconduct or unlawful action, DEG will follow the procedures as outlined in the respective Policy or as required by law.

3. Principles

1. **Fairness and Natural Justice** - All students have the right to present their case and provide evidence.
2. **Accessibility** – There is cost to lodge a complaint. The process is simple to access and available to all students and relevant stakeholders.
3. **Confidentiality** - Complaints and appeals will be managed sensitively, with information only shared with those directly involved and as necessary to investigate and resolve
4. **No Victimisation** - Students will not be disadvantaged or penalised for making a complaint or appeal.
5. **Timeliness** – Complaints and appeals will be acknowledged within 2 business days and resolved as quickly as possible. If a matter cannot be resolved within 30 calendar days, students will be notified in writing and kept updated.

4. Procedures

4.1 Informal Resolution

Students are encouraged to raise concerns informally in the first instance. Often, issues can be resolved quickly by speaking directly with the staff/ other students involved or a more senior member of staff.

If the matter cannot be resolved informally, the student may proceed with a formal complaint or appeal.

4.2 Formal Resolution – General Complaints & Appeals

This section outlines the three stages involved in the investigation of a complaint or appeal:

4.2.1 Stage One – Initial Investigation

Lodging a Complaint/Appeal

- Complete the Complaints and Appeals Form (available in the student’s learning portal on request).
- Submit the online form.

- DEG will acknowledge the complaint/appeal in writing within 2 business days.

Investigations

- Depending on the type of issue, the matter will be allocated to the appropriate manager for investigation. This may include review of student records, student assessments, interviews with other students and or clients/patients, trainer input and correspondence.
- The manager responsible will draft a response.
- Any complaint or appeal requesting a refund or VSL re-credit will be referred to the General Manager, Operations (GMO), CFO or CEO for approval before a decision is communicated. The Fees and Refund Policy must be read in conjunction with any request for a refund or VSL re-credit.

Outcome – in the case of a Complaint

- Where possible, remedy for any impact caused by the issue as outlined in the complaint will be communicated to the party.
- A written outcome, including reasons for the decision, will be provided within 14 working days wherever possible.
- Where a response cannot be provided within the 14 working days, DEG will communicate in writing the extended response timeframe, including a reason for the delayed response.
- The Complaint will be thoroughly investigated and added to the Continuous Improvement Register for review of relevant process/procedure to prevent future impact.
- Where the determined outcome of the complaint produces an outcome that the complainant considers unsatisfactory, the party may request an Internal Appeal.
- Any appeal must be made in writing and submitted via email within 5 working days.

Outcome – in the case of an Appeal

- A written outcome, including reasons for the decision, will be provided within 14 working days wherever possible.
- Where a response cannot be provided within 14 working days, DEG will communicate the extended response timeframe, including a reason for the delayed response.
- Where an appeal produces a dissatisfactory outcome, the party may request an Internal Appeal.

4.2.2 Stage Two – Internal Review

Eligibility for Internal Review

- The party has formally completed Stage One; and
- The party is not satisfied with the Stage One decision.

Requesting an Internal Review

- Request for an internal appeal must be lodged to the General Manager, Operations (GMO) in writing.
- Each party involved in the internal review has the right to be:

- Accompanied or assisted by another person of their choosing who will act as a non-speaking support person;
- Responsible for any costs associated with such accompaniment or assistance.

Investigation and Outcome

- The GMO will review all relevant evidence, consult parties involved, and make a determination.
- A written outcome will be provided within 21 working days.
- Where a response cannot be provided within 21 working days, DEG will – in writing – communicate the extended response timeframe, including a reason for the delayed response.
- If unresolved, the initiating party may request review by the Chief Executive Officer (CEO) or their delegate, which must be requested to the GMO in writing.
- The CEO or delegate will review all relevant evidence and provide an outcome in writing within 21 working days.

4.2.3 Stage Three – External Review

Eligibility for External Review

- The party has formally completed Stages One and Two; and
- The party is dissatisfied with the Stage Two decision.

Requesting an External Review

- To request an external review, the party may contact an independent person or body to conduct the review. This individual or body must:
 - Have no prior involvement in the complaint or appeal;
 - Be independent from all parties involved;
 - Possess appropriate expertise relevant to the subject matter of the complaint.
- DEG staff will not support the preparation of raising a complaint or appeal to an external party.
(A list of recommended external bodies is provided within this document)
- Each party involved in the external review has the right to be:
 - Accompanied or assisted by another person of their choosing;
 - Responsible for any costs associated with such accompaniment or assistance.

Investigation and Outcome

- The external reviewer will consider all relevant documentation and may conduct interviews or request additional information if necessary.
- The review will be conducted in a timely and impartial manner, ensuring procedural fairness to all parties.
- A written outcome will be communicated to all parties, including reasons for the decision and any applicable recommended actions or remedies.

- In the case of the external review being conducted by a regulating or governing body, DEG will comply with the requirements of their procedure.
- DEG will provide documentation or evidence as required under the various legislation, contract or standards. DEG reserves it right to only supply evidence that it is required to supply.

Recommended External Bodies

<i>External Body</i>	<i>Circumstance</i>
Queensland Training Ombudsman	for apprentices, trainees, or students funded under QLD government programs
VET Student Loans Ombudsman (Commonwealth Ombudsman)	for issues relating to VET Student Loans, refunds, or re-credits
Overseas Students Ombudsman	for international students studying in Australia
Australian Skills Quality Authority (ASQA)	for training grievances

5.3 Formal Procedure – Complaints Involving Serious Misconduct

Where serious misconduct is reported via a complaint, the respective formal procedures are as outlined in their Policy:

- Sexual Harassment, Sex-Based Harassment and Sexual Misconduct Policy
- Child Protection Policy
- Discrimination Policy

5. Special Conditions

- Assessment Appeals - If an appeal relates to assessment, a re-assessment by a different assessor may be offered.
- Refund or Re-credit Requests - Any complaint requesting a refund or VSL re-credit will be reviewed in line with DEG's Fees and Refunds Policy. These decisions must be approved by the GMO or CEO.
- Student Enrolment - A student's enrolment will remain active during the complaints and appeals process unless extenuating circumstances apply
- Evidence: where DEG believes the complaint has not been the author of the complaint, the complaint is excessive in nature, is difficult to understand or contradictory in nature, DEG may choose to interview the party and take a verbal statement. If DEG chooses to interview the student, either in person or via teams, the party will be offered to bring a support person. The support person will not be invited to speak during the interview.

6. Retention of Complaints and Appeals

- All documentation resulting from a complaint or appeal will be retained by DEG for five years.
- The parties involved may request documented proof of the complaint or appeal at any time by providing a written request.

7. Publication

This procedure is made available to all students via:

- DEG websites
- Student handbooks
- Enrolment contracts
- Student induction sessions
- Request from any DEG office

8. Definitions

Appeal – A formal request by a student or client for a review of a decision made by the RTO, relating to an assessment outcome, disciplinary action, complaint or other formal decision that affects the individual’s progress, enrolment, or experience.

Complaint – An expression of dissatisfaction with services, staff, decisions, actions, or conduct (including by third parties), where a response or resolution is explicitly or implicitly expected. (For VET Student Loans, “Grievances” are referred to as Complaints)

DEG – refers to Demi Education Group; includes Niche Education Group (AACDS), Demi International Beauty Academy, Demi Apprentices and Trainees, International College of Queensland and Aspire Clinics. DEG is responsible for managing complaints and appeals lodged against any of the abovementioned entities.

GMO – General Manager, Operations. The GMO is responsible for handling escalations and appeals and is the first investigator of any serious misconduct reports.

Serious Misconduct – Under this Policy, this refers to Sexual Harassment, Sex-Based Harassment, Sexual Misconduct, Child Abuse and Discrimination.

9. External Contacts

Queensland Training Ombudsman

Website: www.trainingombudsman.qld.gov.au

Phone: 1800 773 048

VET Student Loans Ombudsman (Commonwealth Ombudsman)

Website: www.ombudsman.gov.au/vet-student-loans

Phone: 1300 362 072

Overseas Students Ombudsman

Website: www.oso.gov.au

Phone: 1300 362 072

Australian Skills Quality Authority (ASQA)

Website: www.asqa.gov.au

Phone: 1300 701 801

Department of Employment and Workplace Relations (DEWR)

Website: www.dewr.gov.au

Department of Employment, Small Business and Training (DESBT – QLD)

Website: www.desbt.qld.gov.au

Department of Fair Trading (QLD)

Phone: 13 32 20

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