



Consultation paper

Interim statement of regulatory expectations: Student grievance and complaint mechanisms

Why we're seeking your feedback

TEQSA is seeking feedback on this draft *Interim statement of regulatory expectations: Student grievance and complaint mechanisms* that has been developed to support wellbeing and safety in higher education.

This statement was developed by TEQSA following roundtable discussions and other engagements last year. In preparing this statement, TEQSA heard from students, providers and other stakeholders.

We also considered information provided to several parliamentary inquiries and parliamentary committee recommendations.

How to provide feedback

This consultation opened on Thursday 6 March 2025 and closes at 5:00pm (AEDT) on Thursday 27 March 2025.

You can submit feedback to consultation@teqsa.gov.au. Submissions in Microsoft Word or .PDF format are preferred.

Questions about this consultation

If you have any questions about this consultation, please email socialcohesion@teqsa.gov.au.

After feedback closes

TEQSA will consider all feedback and will aim to publish the final guidance materials in April 2025.



Contextual information

A statement of regulatory expectations (SRE) is a new regulatory guidance format that TEQSA has adopted to address systemic risks to compliance with the Threshold Standards.

SREs apply to all providers and are integrated into TEQSA's regulatory processes and approach. Where TEQSA identifies a greater risk of non-compliance, some providers or groups of providers may be expected to meet additional reporting requirements.

SREs are prescriptive and the expectations are integrated with our regulatory processes. This distinguishes SREs from other TEQSA guidance, such as guidance notes or sector updates, which provide general advice and information to support compliance.

TEQSA's draft *Interim statement of regulatory expectations: Student grievance and complaint mechanisms* outlines the minimum actions TEQSA expects providers to take in order to demonstrate they meet their obligations under the *Higher Education Standards Framework (Threshold Standards) 2021* regarding student grievance and complaint mechanisms.

Additional reporting requirements – student grievance and complaint mechanisms

TEQSA require providers in the Australian University category to provide additional information to TEQSA about how they are meeting these expectations. TEQSA will engage with the National Student Ombudsman and Department of Education around these proposed requirements to ensure there is no unnecessary burden on universities.

TEQSA is proposing an additional reporting requirement for universities to assure TEQSA that each university is meeting its obligations or actively taking steps to address issues.

This is in keeping with TEQSA's legislated requirements to ensure a proportionate regulatory response to risks to compliance with the Threshold Standards.

TEQSA is concerned that the greatest risk to students resides within universities, given the number of students they enrol and the complexity of their operations.

TEQSA will share further details with universities in the coming months about the reporting requirements once the SRE is finalised and published.



Interim statement of regulatory expectations: Student grievance and complaint mechanisms (2025-26)

In 2024, TEQSA's regulatory work with the sector, consultations with students and stakeholder roundtables identified important opportunities to strengthen higher education providers' student grievance and complaint mechanisms. Amid protests on university campuses, students reported a wide range of challenges, including difficulties accessing grievance and complaint processes and concerns about a lack of transparency in how complaints are handled and progressed. TEQSA also identified opportunities to apply lessons from work on responding to complaints of gender-based violence, to improve handling of other types of student grievances and complaints.

This interim statement will inform actions registered higher education providers (providers) and their governing bodies need to take to ensure they are effectively meeting the [Higher Education Standards Framework \(Threshold Standards\) 2021](#) (Threshold Standards) in relation to student grievance and complaint mechanisms.

The statement is interim because:

- Higher education providers will need to undertake work to review and mature their grievance and complaints mechanisms, to ensure they meet the expectations. It is expected that:
 - providers in the Australian University category complete this work by 31 December 2025
 - all other providers complete this work by 30 June 2026.
- There is ongoing work that may guide revisions to the regulatory expectations in this timeframe. This includes the work by the National Student Ombudsman, the Race Discrimination Commissioner, the Special Envoy to Combat Antisemitism in Australia, the Special Envoy to Combat Islamophobia in Australia, and reviews conducted by some universities.

TEQSA's regulatory expectations are consistent with the provisions of the Threshold Standards, particularly that:

- the support offered to students is informed by and meets the needs of student cohorts (Standard 2.3.3)
- a provider's grievance and complaint mechanisms are capable of resolving grievances about any aspect of a student's experience with the provider, its agents or related parties (Standard 2.4.1)
- all students have opportunities to provide feedback on their educational experiences, which informs institutional monitoring, review and improvement activities (Standard 5.3.5)
- a provider's governing body exercises competent oversight of and is accountable for all of the provider's operations (Standard 6.1.1), which includes grievance and complaint mechanisms, and wellbeing and safety
- a provider can demonstrate, and governing body assure itself, that is operating effectively and sustainably. This includes monitoring complaints, allegations of misconduct, breaches of academic integrity, and critical incidents, and taking action to address underlying causes (Standard 6.2.1.j).



TEQSA recognises that providers will meet these expectations in different ways depending on their student cohort, operating environment, and the various legislative requirements under which they operate.

These regulatory expectations apply to all provider grievance and complaint mechanisms that address various aspects of a student's experience. These include but are not limited to grievances and complaints about:

- any provider decision, action, or inaction affecting an individual student or group of students
- the behaviour or conduct of a member/s of a provider's staff
- the behaviour or conduct of a student/s.

If Parliament adopts a National Code on preventing and responding to gender-based violence, that code will override the requirements in this statement for any complaints covered by the National Code.

TEQSA's regulatory expectations

1. Providers must ensure their student grievance and complaint mechanisms meet the requirements of the Threshold Standards.
2. Providers must undertake review and improvements to student grievance and complaint mechanisms to ensure they meet these regulatory expectations and the needs of their student cohorts.

Characteristics of good practice

3. The characteristics of good practice for student grievance and complaint mechanisms that TEQSA expects providers to demonstrate include the following:
 - a. A positive complaint management culture is promoted, with senior leaders demonstrating complaints are welcomed and inform improvements.
 - b. Information about grievance and complaint policies and procedures is advertised and easily accessible, including for international students and students with special needs.
 - c. Barriers to making a complaint are identified, and reasonable steps are taken to minimise or remove these barriers. Students who need additional support to make a complaint must be offered that support.
 - d. Multiple options are available for students to lodge complaints, ensuring accessibility for those who require assistance or cannot access standard channels.
 - e. Complainants may choose to make complaints anonymously or confidentially. Complainants are to be informed about any impacts a choice to complain anonymously or confidentially may have on the investigation, consideration or outcome of the complaint.
 - f. Complainants must provide informed consent before information is shared with any other parties as part of managing a complaint or grievance.
 - g. Early in the grievance and complaints process, the complainant is to be provided with information about the scope of what the provider can consider, and potential outcomes that may result from the grievance and complaint process.
 - h. Complainants and respondents (where applicable) must be given a clear outline of the complaints process and a timeline for resolution. Any factors that may cause delay are explained.
 - i. Complainants and respondents (where applicable) are provided with, or can access, timely updates on the progress of their grievance or complaint.



- j. Students (complainants or respondents where there is a respondent) who require support through a complaint or grievance process are referred to appropriate support services.
- k. To the extent possible within privacy obligations, at the end of the complaint process, the complainant must be provided with information in writing about the activities undertaken to manage the complaint, and any actions or outcomes.
- l. Information must be advertised and easily accessible about how students can access the National Student Ombudsman (NSO) if they are unsatisfied with how the provider has handled their grievance or complaint.
- m. Policies and processes anticipate and offer protections against the risk of reprisals for people raising a complaint or grievance.
- n. Policies detail how complaints will be dealt with consistently, and with procedural fairness.
- o. Policies and processes for handling grievances and complaints are trauma informed.
- p. Policies explain how the provider responds to complainants with challenging and unacceptable behaviour – including how it distinguishes between normal, challenging and unacceptable behaviour.
- q. Sufficient staff are employed to manage the volume and complexity of complaints the provider receives.
- r. Staff responsible for handling student grievance and complaints receive appropriate training in:
 - i. managing student grievances and complaints, which involve challenging or unacceptable behaviour.
 - ii. trauma-informed and person-centred practice.
 - iii. the specific issues including prejudices, discrimination and conduct that adversely impact or pose a risk to the safety or wellbeing of different student cohorts. This may include but is not limited to people with a disability, First Nations students, international students, students aged under 18, Jewish students (antisemitism), Muslim students (Islamophobia), LGBTIQ+ students, and refugees.
- s. The transfer of complaints between staff is minimised. Frontline complaint-handling staff must have appropriate power and delegations to resolve complaints where possible, with only serious or complex complaints escalated to the appropriate officer or team.
- t. Staff responsible for making decisions on grievances and complaints, including those who handle appeals, are appropriately trained in administrative decision making.
- u. The need to support the wellbeing and safety of staff managing or responding to grievances and complaints is identified and appropriate mitigations and supports are in place to respond to these needs.
- v. Local, domestic and global events are monitored to identify any changes that may impact student wellbeing and safety, or demand for student grievance and complaints. Adjustments are made accordingly to student-facing services, support, grievance and complaint processes.
- w. During periods of heightened tensions or stress for students, providers proactively contact identified student groups to offer comprehensive support and ensure any relevant adjustments are made to facilitate access to grievance and complaint mechanisms.

Monitoring, review and improvement

- 4. Monitoring, review and improvement of student grievance and complaint mechanisms are routinely undertaken, including:
 - a. Students who have engaged with complaints services as a complainant or respondent are invited to provide feedback on their experience.



- b. Cyclic review of policies, procedures and complaints-handling training is undertaken to ensure they are fit for purpose and identify opportunities for improvement.
- c. The student body is consulted or otherwise contributes to reviews and changes to policies for student grievances and complaints. A summary of responses to student feedback is published.
- d. De-identified complaints data is analysed at least twice a year, to identify themes and opportunities for improvement. Themes and opportunities for improvement are to be reviewed by the executive to inform their consideration and responses to key risks and actions.

Governance and public reporting

5. Expectations for governance and public reporting include the following:
 - a. Providers anticipate and prepare for internal reporting and annual public reporting against a reporting framework to be developed by TEQSA and the National Student Ombudsman.
 - b. At least twice a year, the governing body must review a report of de-identified complaints data, including an analysis of trends and opportunities for improvement. The governing body is to ensure that appropriate responses are implemented to address serious or recurring complaint issues.
 - c. The governing body must assure itself that the provider is meeting its obligations under the [Threshold Standards](#) in relation to student grievance and complaint management. This includes ensuring that any trends or issues identified from complaints data have been adequately addressed.

Application of this statement

This statement of regulatory expectations applies to all higher education providers.

TEQSA acknowledges that some providers may have additional obligations under the:

- [National Code of Practice for Education and Training to Overseas Students 2018 \(National Code\)](#)
- [Higher Education Support Act 2003 \(HESA\)](#)
- [Higher Education Provider Guidelines 2023](#).

TEQSA's regulatory approach

TEQSA expects all higher education providers to review their student grievance and complaint mechanisms and implement necessary improvements within the deadlines outlined in this statement.

As part of any regulatory activity, including re-registration or compliance assessments, TEQSA may require evidence of credible plans and demonstrable progress towards meeting these expectations. Providers must also demonstrate that their governing body is maintaining appropriate oversight and assuring itself that the provider is meeting the Threshold Standards and demonstrating good practice in meeting these regulatory expectations. When assessing compliance, TEQSA will also consider information from the NSO.



Review

This interim statement will be reviewed and updated no later than 31 December 2026.