

Grievances, Complaints and Appeals Handling Policy

Scope

This policy was developed for the Insurance and Financial Practitioners Association of Singapore ('IFPAS').

This policy applies to:

- all current students who have accepted IFPAS' Conditions of Enrolment
- all applicants who formally applied to be enrolled at IFPAS
- any third-party providing services on IFPAS' behalf to current or prospective students at IFPAS, should IFPAS enter into a third-party agreement
- all staff members involved in the grievances, complaints and appeals process.

This policy is to be used in the management of all grievances, complaints and appeals relating to all aspects of a student's educational experience and learning environment at IFPAS.

**Note: Students may include prospective students who have had some interactions with IFPAS (e.g. applied directly to IFPAS for a course), current students (irrespective of mode of participation) and past students (within 12 months from the date students cease to be enrolled with IFPAS).*

Purpose

The purpose of this Policy is to provide:

- a framework for managing complaints and appeals
- a procedure for investigation of complaints and appeals
- a fair, equitable and confidential means of resolving complaints and appeals.

Definitions

A **grievance** is defined as "cause for complaint, especially of unjust treatment". Common sense should be used before expressing a grievance. The fact of failing a course or a particular assessment is not itself a grievance. There has to be an element of unfairness involved. It doesn't have to be a failure – if a student has been unfairly given a mark that is lower than they deserve, and the academic staff member will not correct this, then the student may have a grievance.

Grievances typically fall into two categories:

- minor issues that are suitable to be addressed informally and usually resolved easily by having a discussion with a staff member to clarify a misunderstanding
- those involving a formal process for resolution – such grievances are known as a "complaint" or a "formal complaint", to distinguish them from matters that are resolved informally.

A **complaint** is an expression of dissatisfaction by a student* or person, as described in the scope of this policy (hereafter referenced as the complainant) about an issue related to an IFPAS qualification, or an individual associated with IFPAS which requires review, investigation or action. All students are entitled to access the complaints process. Activities which may give rise to complaints covered by this policy are listed below:

- Education programs (content or structure)
- Subject enrolment, delivery, assessment, learning environment; outcomes, access to resources
- Student services and their processes (including contractor or employee conduct)
- Individuals who believe that they have been treated unfairly on the grounds of access and equity
- Occupational health and safety concerns related to subject delivery and/or assessment
- Administrative action/inaction, procedure or decision.

An **appeal** is a process whereby following the final outcome of a formal complaint being lodged by a student, the student disputes a decision, determination or penalty made by IFPAS.

Policy Principles

Complaints will be addressed based on their particular circumstances; however, the following general principles will also be adhered to:

- All complaints will be made and dealt with in a timely manner according to the complaints process.
- Resolution of a complaint may be reached at any stage. Upon resolution all further investigation ceases, unless, in the interests of improving the services, products or processes the manager involved in the investigation or resolution considers further investigation is warranted.
- Details of the complaint, its investigation and outcome will be documented and filed appropriately and can be requested at any stage of the process by the complainant or respondent.
- Complainants have a right to appeal if they believe their complaint has not been adequately resolved.
- There shall be no charges payable in relation to the lodgement of a grievance, complaint or appeals by a student or prospective student.
- The complainant and respondent will not be victimised or discriminated against in any manner and all details of the complaint and subsequent investigation will remain strictly confidential.
- A student may seek confidential, independent professional advice at any stage of a complaint.
- The complainant and respondent may bring one person (such as a friend, family member, counsellor or other support person) to support them to any meetings during the complaint process. The support person cannot be a legal practitioner and the student is obliged to notify IFPAS that the person will be attending before the meeting.
- Students will continue their studies as usual during the complaint process, except in circumstances where their health or safety is potentially at risk or if they pose a health or safety risk to others.
- The outcome of each complaint and appeal will be analysed and recommendations for improvement of services will be recorded in the “Complaints Register” and implemented throughout IFPAS’ operations.
- Complaints and appeals that are frivolous, unreasonable, or lacking substance will be dismissed.
- IFPAS will maintain the student’s enrolment while the internal or external appeal process is ongoing. Students are strongly advised to continue with their studies and thereby maintain their course progress requirements.

Grievance and Complaint Process

Stage 1: Grievance received

In the first instance, issues relating to the grievance should be raised informally with a representative of IFPAS, this can be done verbally or in writing. If the student is not satisfied with the resolution of the grievance, a formal written complaint may be lodged with IFPAS.

Stage 2: Lodging a Formal Written Complaint

All formal complaints (including complaints related to assessment outcomes) must be submitted in writing within fourteen (14) calendar days of the incident.

In exceptional circumstances, such as where a complainant is unable to provide a written submission due to a special circumstance requiring reasonable adjustments, IFPAS may allow a formal complaint to proceed.

To assist in the resolution of a complaint, the complainant must include the following information when communicating their complaint to IFPAS.

- If lodging form via email, use the word “Grievance” or “Complaint” in the email subject line.
- If applicable, identify the subject/course and study period.
- Summarise the issues relating to the complaint.
- Provide any evidence of attempts to resolve the complaint – emails, examples, dates, times etc.
- Specify the outcome that is being sought.

Where a complainant would like to submit a formal complaint, the complainant must email the details of the complaint to IFPAS via education@ifpas.org.sg.

The complainant will receive written confirmation within seven (7) calendar days that their written complaint has been received.

Stage 3: Investigation of Complaint

Upon receipt of a formal complaint, details will be recorded on IFPAS’s Complaints Register.

All complaints will be investigated within fourteen (14) calendar days of it being received or as soon as practicable (depending on the nature of the complaint) and resolved by the appropriate manager and in accordance with this Policy.

Investigation of these complaints may involve:

- reviewing worked examination papers or assignments
- reviewing course materials or resources
- consulting other course participants
- reviewing academic processes course evaluations
- reviewing processes if the complaint relates to an administrative or financial matter, such as enrolments and fee refunds
- reviewing information provided if the complaint relates to bullying and/or harassment
- review potential unfair treatment of individuals on grounds of access and equity

- review processes if there are health and safety concerns regarding delivery of courses and/or assessments
- speaking to relevant IFPAS staff members to obtain further information.

Where possible, complaints will be resolved promptly.

Stage 4: Interview conducted

Where there are grounds for further investigation of a complaint, particularly where it relates to learning, assessment or access and equity, a formal interview or meeting with the student/s involved in the complaint may be conducted to agree on an appropriate resolution.

Stage 5: Resolution of Complaint

Once the investigation has been conducted and a determination made, the complainant will receive a written response from IFPAS detailing the actions taken in response to the complaint and reasons of the outcome. This will usually occur within fourteen (14) calendar days of acknowledgement of the complaint, or as soon as practicable (depending on the nature of the complaint). If for some reason the investigation or determination takes longer, the student will be advised in writing.

If IFPAS receives no communication from the complainant within fourteen (14) calendar days of the date the written response is sent, the complaint will be considered closed, except in exceptional circumstances.

Any determination made in relation to a formal complaint will be documented in the Complaints Register.

Appeals Process

Stage 1: Submitting an Appeal

Right to Appeal

Following the final outcome of a formal complaint having been lodged by the complainant, the complainant subject to a determination in relation to a complaint, who believes that they have grounds for appeal, is entitled to appeal that determination.

Notice of Appeal

If a complainant decides to appeal a determination, they must lodge a written Notice of Appeal, within fourteen (14) calendar days of the determination being made.

The Notice of Appeal must set out the following:

- Grounds of appeal.
- Provide evidence supporting the grounds of appeal or any new information not previously provided with the original complaint.
- The outcome sought by the student for the appeal.

There is **no cost** incurred for the appellant during the appeals process and parties will not be discriminated or victimised during the appeals process.

Where a complainant would like to submit a Notice of Appeal, the complainant must email the details of the Notice of Appeal to IFPAS via education@ifpas.org.sg.

Grounds of appeal

An appeal of a determination may be made on one or more of the following grounds:

- that new evidence of a relevant nature is available
- that the decision was made without due consideration of relevant facts, evidence or circumstances
- that there was bias, prejudice or a conflict of interest by the investigative or hearing body
- that some significant policy/procedural irregularity occurred in the investigative or hearing process.

Students may not appeal against educational results based on:

- the subject structure and assessment methods
- student workload or the amount of work the student has done
- financial implications of not passing the unit
- grades received by the student in other units
- the need for additional marks to enable a pass/better grade.

Stage 2: Investigation of Appeal

Duties of the appeals committee

On receiving the appeal application, the Appeals Committee or delegate will review the application and determine whether to grant or dismiss the application.

If the Appeals Committee or delegate believes there are no grounds for appeal, or that the appeal is lacking in substance or is frivolous or vexatious. Where an appeal application is dismissed, appellants will receive written notification within seven (7) calendar days of the decision and informed of further appeal avenues.

Stage 3: Appeal hearing (only for educational matters)

If the Appeals Committee decides to proceed with the appeal, a meeting of the Appeals Committee will be convened within a reasonable time, which will normally not be more than fourteen (14) calendar days after the Notice of Appeal.

Duties and powers of the appeals committee

The Appeals Committee will determine the general conduct of the appeal hearing and the procedures to be adopted, as it thinks fit, based on general principles of natural justice and procedural fairness.

The Appeals Committee has the power to:

- Hear the appeal in relation to the determination of the complaint.
- Review, uphold, dismiss or vary the determination of the complaint.
- Refer the matter back to IFPAS for further inquiry and determination.

The Appeals Committee will consider all documentation submitted in connection with the appeal, including any written submissions from the student and any representative of IFPAS. The Appeals Committee may also refer to documentation or evidence tendered during the investigation or hearing as well as any other information relevant to the appeal. A member of the IFPAS staff may, on behalf of IFPAS, defend the original determination.

At the appeal hearing, the appellant concerned may be accompanied or assisted by a third party if so desired but must advise IFPAS prior to the hearing if they intend to do so. Both parties, the appellant and IFPAS may not appoint a legal representative to represent them at the appeal hearing.

The Appeals Committee may reasonably adjourn at any time during the appeal hearing to consider any matter it deems relevant.

Stage 4: Resolution of Appeal

Appeals Committee Decision

At the completion of the hearing, the Appeals Committee must decide and communicate the outcome to IFPAS within seven (7) calendar days of the hearing.

The Appeals Committee or delegate's decision will be forwarded to IFPAS, who will communicate the outcome in writing to the appellant usually within fourteen (14) calendar days of the decision being made or as soon as practicable (depending on the nature of appeal). If for some reason, the investigation or determination takes longer, the appellant will be advised in writing. IFPAS is also responsible for enacting any recommendations made.

The appellant may withdraw their appeal at any stage in the process. If the appellant does this no further appeals will be accepted and the appeal will be deemed resolved.

Upon upholding an appeal of a complaint, the Appeals Committee or delegate, as appropriate, may determine what action is to occur. Where the Appeals Committee or delegate dismiss an appeal, the original determination is confirmed and may be processed along with any recommendation originally made.

The proceedings and decision of an appeal will be kept private and confidential, as outlined in IFPAS' Privacy Policy. An appellant may request access to records of the hearing and reasons for the determination. A decision of the Appeals Committee or delegate is final and binding on all parties. The appellant may pursue relevant action available to them under relevant legislation.

The availability of this complaints and appeals process, does not remove the right of the student to take action under the Consumer Protection (Fair Trading) Act 2003 (CPFTA) if the CPFTA applies.

Recordkeeping for Complaints and Appeals

Where a complainant/appellant lodges a formal complaint or appeal they must be advised of:

- the receipt of the complaint or appeal by IFPAS and any proposed action to be taken
- the outcome and the reasons for the outcome of the complaint or appeal and any further avenues for appeal available.

All records relating to the complaint and/or appeal will be recorded on the complainant's/appellant's record to allow both parties access to these records upon written request.

All records are considered private and confidential and will be treated in accordance with the IFPAS Privacy Policy.

Relevant Legislation

Listed below are the most relevant legislations which apply to this policy:

- Consumer Protection (Fair Trading) Act 2003
- Personal Data Protection Act 2012

Related Policies

This policy should be read in conjunction with the following IFPAS policies:

- Educational Integrity and Conduct Policy.
- Privacy Policy.

Version Control

Policy Category:	Academic		
Approved by:	IFPAS General Manager		
Review Date:	December 2027		
Version	Brief Description of the changes	Date Approved:	Effective Date:
1.0	New policy and procedure.	08.05.2023	08.05.2023