

Complaints and Grievances

Version 4, October 2025

Authorisation	Chief Executive
Procedure Domain	Exec, People & Systems
Procedure Type	Risk Management
Procedure Setting	Industrial Relations
Effective Date	October 2025

Procedure Context

Standards of other external requirements	Australian Psychological Society Code of Ethics
Legislation or other requirements	Age Discrimination Act 2004 Australian Human Rights Commission Act 1986 Carers Recognition Act 2004 Censorship Act 1996 Criminal Code Act 1902 Disability Discrimination Act 1992 Equal Opportunity for Women in the Workplace Act 1999 Privacy Act 1988 Human Rights and Equal Opportunity Commission Act 1986 Racial Discrimination Act 1975 Sex Discrimination Act 1984 Fair Work Australia Act 2009 Public Interest Disclosure Act 2013 WA Disability Services Act 1975 WA Mental Health Act 1996 WA Industrial Relations Act 1979 Western Australia Equal Opportunity Act 1984 Injury Control Council WA Constitution
Contractual obligations	Injury Matters Employment Contracts

Road Safety Commission Contracts

Department of Health Contracts

Procedure Statement

The purpose of this procedure is to provide a structured framework to address and resolve complaints and grievances with care, promptly and constructively.

Injury Matters acknowledges that conflicts can arise and aims to foster a dynamic, healthy, safe and supportive working environment. This procedure is further supported by the [Injury Matters Service Charter](#) and Code of Ethics and Conduct Policy.

Scope

This procedure applies to all Injury Matters Team Members, including volunteers, clients, contractors and the community.

Definitions

Complaint

An expression of dissatisfaction made to or about Injury Matters, Injury Matters services, Team Members or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required. For the purpose of this procedure, a complaint becomes a grievance once it is formally submitted in writing.

Grievance

For the purpose of this procedure, a Grievance is a written statement provided on the [Complaints & Grievances Form](#).

Grievant

One who submits a grievance for resolution through the grievance procedure for arbitration.

Reportable Behaviours

For the purpose of this procedure, any matter an individual believes goes against the [Injury Matters' Service Charter](#), Code of Ethics and Conduct Policy, is misconduct or is a breach of the law, should be reported. Some reportable behaviours could include:

- a. Creating an unsafe environment;
- b. Breaches any of Injury Matters' policies/procedures;
- c. Discrimination.
- d. Harassment and bullying.
- e. Dishonesty.
- f. Unethical and;
- g. Violation of the law or any legal code.

Please note that the above is not an exhaustive list, and a common-sense and practical approach needs to be applied in all circumstances.

Responsibilities

Grievant/Person(s) involved

1. Maintain a record of any action taken to date to resolve the grievance informally (*e.g. emails/screenshots or other evidence relating to the issue or conduct*).
2. All matters relating to the grievance should only be discussed with those involved in the Grievance Resolution Process.

Team Members

1. All matters relating to the grievance should only be discussed with those involved in the Grievance Resolution Process.
2. Team Members must maintain adequate knowledge of Injury Matters Policies and Procedures and how they apply to their roles.
3. Follow the [Injury Matters' Service Charter](#) and act in line with the Injury Matters values.
4. Team Members are encouraged to directly resolve any complaints and grievances with the individual. Injury Matters recognises this is not always possible. If this occurs, Team Members are to escalate the grievance to their Line Supervisor for internal processes to commence at the earliest opportunity.
5. All parties involved should maintain a record of any action taken to date to resolve the grievance informally (*e.g. emails/screenshots or other evidence*).

Line Supervisor

1. Line Supervisors should be aware of any conflicts of interest and act non-biasedly during the investigation.
2. All formal grievance, investigation, and resolution records must be securely stored in a confidential file location within the HR Partner.
3. Actively identify, prevent and communicate potential grievances to the General Manager to mitigate reaching the point of formal grievances.
4. Any grievance is handled most appropriately at the earliest opportunity.
5. All Team Members, members of the public and volunteers are treated fairly and without fear of intimidation.

Business Unit General Manager

1. Proactively initiating and identifying potential problems before they become formal grievances and formulating strategies to enhance a team culture where everyone has the right to feel safe.
2. General Managers are aware of the appropriate avenues of communication when a grievance is raised, ensuring their team understand their roles and responsibilities under this procedure and the level of confidentiality required when sharing information with their Team Members, Volunteers and community members.

Business & Systems Coordinator

1. Support the establishment and maintenance of policies and procedures, forms and process manuals that align with applicable laws, awards, and regulations.
2. The Business and Systems Coordinator actively identifies opportunities for process improvements and communicates them to the People and Systems General Manager.

People & Systems General Manager

1. Provide holistic guidance and support to Line Supervisors/ General Managers and the Chief Executive in resolving the grievance.

2. The People & Systems General Manager is the main point of contact for Team Members regarding grievances, concerns, and complaints.
3. Oversee the creation of policies and procedures to ensure compliance with current and incoming laws, adherence to regulations and compliance requirements.
4. Regular audits and reviews are conducted to verify the accuracy, integrity, and compliance of the current process.

Chief Executive

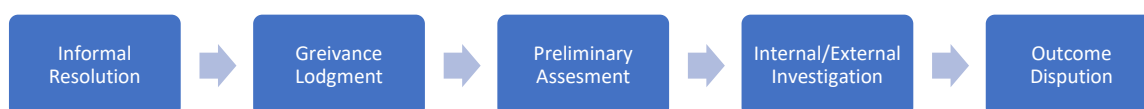
1. All matters relating to the grievance should only be discussed with those involved in the Grievance Resolution Process.
2. The Chief Executive is responsible for the decision-making process and may appoint an external mediator.
3. Responsibility to make decisions in the resolution process that may sit outside current policies and procedures.

Grievance Resolution Process

Injury Matters will address each grievance with integrity and in an equitable, objective and unbiased manner.

Injury Matters will protect the identity of individuals submitting grievances where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by Injury Matters as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

When responding to grievances, Injury Matters has the following complaint-handling process:



Informal Resolution

If the individual is comfortable, Injury Matters encourages the complaint/concern to be raised directly with the person(s). This should be within five (5) working days of the situation occurring. The individual is encouraged to approach the person(s) respectfully and constructively in a safe space that reflects Injury Matters' values. If the individual and person(s) involved agree on a way to move forward, then the complaint is resolved.

When an individual does not feel comfortable approaching the person(s) directly or feels that there was no resolution after discussing with the person(s) involved, they can escalate the complaint to their Line Supervisor within five (5) working days of the complaint occurring. Once the complaint is escalated, it is now defined as a grievance.

Grievance Lodgment

If an individual decides to lodge a Grievance, this can be done using the [Complaints and Grievance Form](#) and sent to the Business Unit General Manager, People and Systems General Manager, or Chief Executive. This should be **within ten (10) working days** of the situation occurring. A grievance involving the Business Unit General Managers should be escalated to the Chief Executive.

Individuals external to the organisation can report the grievance to a Business Unit General Manager or Chief Executive.

When lodging a grievance, the Grievant must have sufficient information recalling the event when the grievance occurred. If formally investigating, provide any evidence, such as emails, chat history, etc., which can assist the grievance resolution process.

A few examples of these can be:

- a. Circumstances/series of events (*e.g., what was said or done/timeline of events*).
- b. Person(s) involved.
- c. Date and time of incident(s).
- d. Place where the incident took place.
- e. Witnesses.
- f. Action taken to date to resolve the grievance informally (*e.g. emails/screenshots or other evidence*).
- g. Outcomes.

Preliminary Assessment

Once a report is submitted, a determination will be made by the Chief Executive if the Grievance can be investigated internally or externally by mediation. If the investigation is to occur internally, the Chief Executive will appoint a Team Member to lead the investigation. If external mediation is to occur, the People & Systems General Manager will make the necessary arrangements and will be the point of contact between the mediator and the persons involved.

Internal/External Investigation

During the investigation process, any person(s) involved may be stood down with full pay at the Chief Executive's discretion. If the investigation determines that the allegations made are not substantiated, then the Team Member will be immediately reinstated to full duties.

The Investigator will undertake the following processes:

1. Clarify the issues and concerns

Promptly address the grievance by arranging a separate meeting with the Grievant and the Person involved, explaining the grievance resolution process, and informing them that they can have a Support Person. Outline meeting details, confidentiality, and the Investigator's role. During the meeting, reiterate their rights, clarify the issues, and document their concerns and desired resolution. Document all information and maintain a clear, fair process.

2. Develop a plan outlining how the facts will be evaluated

Record the identified issues and decide on the facts to be gathered by reviewing relevant materials and identifying necessary interviews. Formulate questions, provide adequate notice for meetings, and record relevant facts during interviews. Ensure both parties sign to confirm the accuracy of the notes taken. Interview any relevant individuals independently and document decisions not to interview certain persons. Provide regular updates to both parties and document the process thoroughly. The Investigator then completes a final report and submits it to the Chief Executive for review.

3. Make final decision

The Chief Executive will evaluate all gathered information and provide preliminary feedback to the Parties for comments and fact verification. If necessary, the Chief Executive may request more information. The Chief Executive will consider various options for resolving the grievance, taking into account cost, industrial relations, policy/procedures, and other

implications. Resolutions could include counselling, reassignment of tasks/responsibilities, suspension or termination of employment. The Chief Executive will ensure the final decision is fair and well-considered, even if it does not satisfy all parties.

4. Document the basis for the decision and provide a copy to all parties

The Investigator will notify the Grievant and the Person involved in writing of the outcome at the conclusion of the grievance process, with any actions and responsibilities. A copy is saved in all parties' files.

Unsubstantiated Allegations

At times, after an investigation, Injury Matters may determine that some allegations are unsubstantiated. A variety of factors may contribute to the conclusion that an allegation does not warrant substantiation, including a lack of supporting evidence, claims submitted with malicious intent, and a failure to conduct a thorough inquiry. In the event that a claim is submitted by a Team Member with malicious intent, further steps will be taken as per the Injury Matters Code of Conduct Process. In the event the claim is submitted by an external party, further action may be taken as per the relevant Acts and legislation. Additionally, reports may be made to the relevant authorities.

Outcome Disputation

If the Grievant or the person(s) involved are unsatisfied with the outcome, they can refer to the [Fair Work Commission](#) and [Fair Work Ombudsman](#) websites for further information.

Support

All parties involved in a grievance process are entitled to have a Support Person of their choice accompany them to meetings. Additionally, support is available to anyone implicated by the disclosure of a grievance by connecting with Injury Matters' [Employee Assistance Program](#) or third-party support providers such as [Lifeline](#) and [Beyond Blue](#).

Documentation

Documents related to this procedure

Related policy	Code of Ethics and Conduct Policy Service Charter
Related processes	Register of Interest Procedure First Aid, Mental Health and Incident Reporting Procedure
Forms, record-keeping or other organisational documents	Interest Declaration Form Complaints & Grievances Form Incident and Hazard Reporting Form

Document revision history

Version	Approval date	Review date	Prepared by	Comments
1				
2	December 2021		Toni Williams	
3	June 2024	June 2025	Twinkle Kajaria	
4	October 2025	October 2026	Twinkle Kajaria	Updated hyperlinks to limit

				access to Injury Matters Organisational accounts.
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