



## APSI Complaint and Grievance Management Policy

June 2019

## Table of Contents

<b>1. Introduction</b> .....	<b>3</b>
1.a Purpose .....	3
1.b Bylaws.....	3
1.c Scope .....	3
1.d Organisational Commitment .....	3
1.e Jurisdiction .....	5
1.f Definitions.....	5
<b>2. Principles</b> .....	<b>6</b>
2.a Whole of organisation culture .....	6
2.b People focused .....	6
2.c Responsive .....	6
2.d Objectivity and Fairness .....	7
2.e Confidentiality.....	7
<b>3. APSI Complaint Handling Policy</b> .....	<b>7</b>
3.a Receive.....	7
3.b Acknowledge .....	7
3.c Assess and investigate .....	7
3.d Managing unreasonable conduct by people making complaints .....	9
3.e Annual reporting of the management of complaints .....	9
<b>4. Service Delivery and Product Complaints</b> .....	<b>10</b>
4.a Training Organisation assessment complaints and appeal. ....	10
<b>5. Grievance Complaints</b> .....	<b>10</b>
<b>6. Resolution of Disputes between members.</b> .....	<b>10</b>
<b>7. Misconduct complaints</b> .....	<b>10</b>
7a. When must a misconduct complaint be made.....	10
7b. Misconduct complaint against an ordinary member who is not an employee, office holder or Board of Management member .....	11
7c. Complaint against APSI employees including office holders.....	11
7d. Handling conduct complaints against the General Manager .....	12
7e. Conduct Complaints against a Board of Management member.....	12
<b>8. Sanctions / Disciplining of members</b> .....	<b>12</b>
8.a Expulsion or suspension of membership .....	13
<b>9. Right of Appeals</b> .....	<b>13</b>
9.a Appeal of determinations in relation to Service Delivery .....	13
9.b Appeal of determinations in relation to Minor Misconduct .....	14
9.c Appeal of determinations in relation to Serious Misconduct .....	14
<b>10. Related Documents</b> .....	<b>14</b>
<b>11. Support and advice</b> .....	<b>14</b>
<b>12. Document Control</b> .....	<b>14</b>

# 1. Introduction

## 1.a Purpose

This **APSI Complaints and Grievance Management Policy** is intended to ensure that the Australian Professional Snowsports Instructors Incorporated (APSI) handles complaints and grievances fairly, efficiently and effectively.

The five key stages in the APSI complaint and grievance management Policy are:



This Policy provides guidance to our members, staff, clients and other people who wish to make a complaint on the key principles and concepts of our complaint and grievance management system.

## 1.b Bylaws

This *APSI Complaint and Grievance Management Policy* is a Bylaw of the APSI and is a supporting document for the APSI Constitution.

## 1.c Scope

This Policy applies to all staff (paid and volunteer), members, contractors and our governing body, receiving or managing complaints from staff, contractors, clients, the public and members, made to or about us, regarding our products, service delivery and staff, or our complaint handling process.

This Policy is applicable to other personal or professional behavior deemed to be misconduct that in the opinion of the majority of the Board of Management may adversely affect the reputation of the APSI.

## 1.d Organisational Commitment

The APSI expects staff and members at all levels to be committed to fair, effective and efficient complaint management. The following table outlines the nature of the commitment expected from stakeholders and the way that commitment should be implemented.

Who	Commitment	How
Board of Management	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"><li>• Provide adequate support and direction to key staff responsible for handling complaints.</li><li>• Regularly review reports about complaint trends and issues arising from complaints.</li><li>• Encourage all staff and members to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li><li>• Encourage staff and members to make recommendations for system improvements.</li><li>• Support recommendations for service, staff and complaint handling improvements arising from the analysis of complaints data.</li></ul>

General Manager	Establish and manage an effective, professional complaint handling system.	<ul style="list-style-type: none"> <li>• Recruit suitable staff.</li> <li>• Provide comprehensive training to complaint handling staff.</li> <li>• Properly manage and support complaint handling staff.</li> <li>• Promote strong internal networks to enable complaint handling staff to work with, and be supported by, other staff.</li> <li>• Provide regular reports to other areas of the APSI on issues arising from complaint handling work.</li> </ul>
Staff whose duties include complaint handling (including Trainers)	Demonstrate exemplary complaint handling practices	<ul style="list-style-type: none"> <li>• Behave professionally when dealing with clients, members and other stakeholders.</li> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Assist people to make a complaint, if needed.</li> <li>• Comply with our policy and associated procedures.</li> <li>• Provide regular feedback to management and/or the governing body on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve our complaints management system.</li> <li>• Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</li> </ul>
Members	Understand and comply with our complaint handling practices.	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Be aware of our complaint handling policies and procedures.</li> <li>• Assist people who wish to make complaints access our complaints process.</li> <li>• Be alert to complaints and assist staff handling complaints to resolve matters promptly.</li> <li>• If making a complaint, especially against another member, act sensitively and comply with the complaints policy and procedures.</li> </ul>
Contractors	Understand and comply with our complaint handling practices.	<ul style="list-style-type: none"> <li>• Be aware of our complaint handling policies and procedures.</li> <li>• Be alert to complaints and assist staff handling complaints resolve matters promptly.</li> </ul>

## 1.e Jurisdiction

The jurisdiction of this Bylaw is the whole of Australia and any other country where a member conducts business on behalf of, or represents, the APSI.

As a body incorporated in New South Wales (NSW), in the absence of, or where a conflict arises, a standard, Policy or legislation pertaining to the state of NSW will be applied.

## 1.f Definitions

The following terms and definitions supplement those contained in the APSI Constitution and Bylaws.

Complaint	<p>An expression of dissatisfaction made to or about us, our services, products, staff, member or contractor, or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.</p> <p>A complaint may be oral or in writing and should identify a complainant, a subject person, and an allegation containing sufficient description of the time, date and place of an alleged issue or conduct which can be reasonably and independently investigated.</p> <p>A complaint may include anonymous written complaints if an alleged conduct can be reasonably investigated.</p>
Grievance	A clear, formal written statement by an individual staff member about another staff member or a workplace related problem.
Must/required/shall	Indicates a mandatory action that must be complied with
Should	Indicates a recommended action that should be followed unless there are sound reasons for taking an alternative course of action.
Member	A person who is a financial member of the APSI - includes Associate member, Life Member, Board of Management member and staff.
Former Member	A person who was previously a member of the APSI but has not paid the current years financial membership fee.
Non-member	A person who is not a member of the APSI - includes Former member.
Complainant	A person who makes a verbal or written complaint or grievance.
Subject person/s	A member of the APSI who is the subject of a written complaint or grievance.
Administrator	The APSI Administrator and/or the APSI Public Officer.
Staff	A person who receives a benefit or payment for personal services provided to the APSI. Includes managerial and administrative positions, trainers and examiners.
External Investigator	A suitably experienced, licensed and accredited external investigator who has no conflict of interest and is able to conduct and report on an investigation of a complaint in an impartial and fair manner.
Constitution	Constitution of the APSI.
Minor Conduct complaint	A complaint relating to conduct where the veracity of the complaint can be determined quickly and addressed by a manager within APSI workplace performance and human resources guidelines.

Serious conduct complaint	A complaint or allegation of conduct which: <ul style="list-style-type: none"> <li>• harms or has the potential to harm the reputation of the APSI</li> <li>• is conduct contrary to APSI values and principles</li> <li>• may require formal investigation and / or</li> <li>• if proven, may adversely affect a member’s suitability to remain in a position of trust within the organisation, or suitability to remain a member of the organisation.</li> </ul>
Unlawful Conduct	Conduct which is contrary to legislation or regulation in a jurisdiction.  Allegations relating to unlawful conduct should be referred to the proper authorities. Conviction of offences relating to unlawful conduct may also result in APSI sanction.
Sanction	A strong action taken in order to make members obey a rule or direction, or a penalty, restriction or punishment imposed when they do not comply.

## 2. Principles

### 2.a Whole of organisation culture

The APSI is committed to seeking and receiving feedback about our services, systems, practices, Policies, products and complaint handling procedures.

The APSI complaint handling system is modelled on the principles of fairness, accessibility, responsiveness, efficiency and integration into our whole of organisational culture.

### 2.b People focused

People making complaints will be:

- provided with information about our complaint handling process and how to access it
- listened to, treated with respect by members and staff and actively involved in the complaint process where possible and appropriate, and
- provided with options for redress or review.

We will take reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf. Complainants will be provided with reasons for our decision/s provided this does not infringe the privacy and confidentiality of the subject of a complaint.

The APSI will accept anonymous complaints if there is a compelling reason to do so and will carry out a confidential investigation of the issues raised where there is enough information provided.

### 2.c Responsive

The APSI will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people’s expectations, and will inform them as soon as possible, of the following:

- the complaints process
- the expected time frames for our actions
- the progress of the complaint and reasons for any delay
- their likely involvement in the process, and

- the possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

## 2.d Objectivity and Fairness

The APSI will address each complaint with integrity and in an equitable, objective and unbiased manner.

Conflicts of interest, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

## 2.e Confidentiality

The APSI will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, or any relevant confidentiality obligations.

## 3. APSI Complaint Handling Policy

The five key stages in our complaint management system are set out below.



### 3.a Receive

The record of the complaint will document:

- Contact information of the person making a complaint and the date received
- Issues raised by the person making a complaint and the outcome/s they want
- Any other relevant information, and
- Any additional support the complainant requires.

### 3.b Acknowledge

We will acknowledge receipt of each written complaint promptly, and preferably within 5 working days.

### 3.c Assess and investigate

#### 3.c.1 Initial assessment

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.

When determining how a complaint will be managed, we will consider:

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected

- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

### **3.c.2 Investigating minor complaints**

Minor complaints may be oral or in writing.

After assessing the complaint, we will consider how to manage it.

We may:

- Give the person making a complaint information or an explanation,
- Gather information about the issue, person or area that the complaint is about,
- Investigate the claims made in the complaint.

We will keep the person making the complaint up-to-date on our progress, particularly if there are any delays.

We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements including privacy legislation.

### **3.c.3 Investigating serious complaints**

All serious complaints are to be provided to the APSI in writing.

We may engage the services of an external investigator to investigate a serious complaint or allegation.

The APSI, or external investigators on behalf of the APSI, will follow best practice in the investigation of serious conduct complaints in relation to:

- Collection of evidence or oral and written statements to support or refute the allegation
- Burden of proof
- Sufficiency of evidence
- Procedural fairness
- Record keeping
- Privacy and confidentiality

The Australian Office of Commonwealth Ombudsman Publication *Better Practice Guide for complaint handling* (2009)<sup>1</sup> and NSW Ombudsman *Investigating complaints – A manual for investigators* (2004)<sup>2</sup> provide guidance.

### **3.c.4 Disclosure of the identity of complainants**

In dealing with matters under this Policy, information that identifies or tends to identify complainants is not to be disclosed unless:

- a) the complainant consents in writing to the disclosure, or
- b) it is generally known that the complainant has made the complaint as a result of the complainant having voluntarily identified themselves as the person who made the complaint,
- c) it is essential, having regard to procedural fairness requirements, that the identifying information be disclosed, or

---

<sup>1</sup> *Better Practice Guide for complaint handling* (2009) available online [https://www.ombudsman.gov.au/\\_\\_data/assets/pdf\\_file/0020/35615/Better-practice-guide-to-complaint-handling.pdf](https://www.ombudsman.gov.au/__data/assets/pdf_file/0020/35615/Better-practice-guide-to-complaint-handling.pdf)

<sup>2</sup> NSW Ombudsman *Investigating complaints – A manual for investigators* (2004) available online [https://www.ombo.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0010/4213/Investigating-Complaints.pdf](https://www.ombo.nsw.gov.au/__data/assets/pdf_file/0010/4213/Investigating-Complaints.pdf)



- d) an external investigator is of the opinion that disclosure of the information is necessary to investigate the matter effectively, or
- e) it is otherwise in the interest of the APSI to do so.

### **3.c.5 Allow the subject person to provide submissions in regards the complaint**

If preliminary enquiries support the complaint or allegation of misconduct:

- a) the substance of the allegation must be put to the subject person
- b) the subject person must be given an opportunity to respond to the allegation
- c) the period and method of response required will be specified
- d) the Board of Management or General Manager, whoever is managing the complaint, must consider the subject person's response in deciding whether the allegation is substantiated and whether or not to impose a sanction
- e) a failure by a subject person to respond to an allegation will not prevent an allegation being substantiated or a sanction imposed.

### **3.c.6 Determine outcome and provide reasons for decision**

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place, and
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

### **3.c.7 Close the complaint: document and analyse data**

We will keep records about:

- How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations), and
- Any outstanding actions to be followed up, including analysing any underlying or root causes.

## **3.d Managing unreasonable conduct by people making complaints**

The APSI will treat people making complaints with respect and patience, wherever possible ensuring complaints are resolved at first contact.

Some complainants can be difficult to deal with. Among the common problems are rude or aggressive conduct, obstinacy in communicating with complaint handling staff, exaggeration or dishonesty in explaining a complaint, unreasonable persistence with a complaint that has been investigated or closed, and demands that are unrealistic or disproportionate to the nature of the complaint.

When people behave unreasonably in their dealings with us, particularly when that conduct is perceived as bullying and harassing, this conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this Policy.

## **3.e Annual reporting of the management of complaints**

The Board of Management President shall provide to the APSI in the Annual Report, a de-identified summary of complaints received, appropriate root cause analysis, investigations undertaken and any procedural changes and improvements made as a result of these complaints during the reporting period.

## 4. Service Delivery and Product Complaints

Complaints related to the availability, quality, cost or timeliness of service delivery or products should be dealt with at the lowest effective level in the most timely and effective manner possible.

The APSI General Manager shall provide guidance to administrative staff, trainers and examiners as to their delegations and authorities in the handling and resolution of individual service delivery and product complaints.

Trainers and Technical Directors should report all systemic service delivery complaints to the General Manager to assist strategic program performance review.

### 4.a Training Organisation assessment complaints and appeal.

Complaints relating to course accreditation and assessment are outside the scope of this Policy. Complainants should refer to the relevant discipline training and/or examination appeals process.

## 5. Grievance Complaints

The APSI is committed to providing a safe and harmonious workplace. Refer to APSI Human Resources policies for further detail.

Grievance complaints involving members and staff should be managed at the lowest effective level either by workplace supervisors, trainers, Technical Directors or General Manager in accordance with applicable workplace and industrial relations legislation and policies.

Supervisors managing workplace complaints should have consideration for individual workplace contracts and best practice human resource guidelines.

External workplace mediation may be utilised to manage interpersonal conflict and disputes.

Nothing in this section is intended, or has authority, to limit or constrain members seeking remedy via external administrative or judicial processes.

## 6. Resolution of Disputes between members.

Resolution of disputes between members shall be managed in the first instance, in accordance with this Policy. All parties will be asked to consent to endeavoring to settle the dispute by mediation. A member of the Board of Management shall act as mediator.

If the dispute is unable to be resolved internally, the matter may be referred by any party, to a NSW Community Justice Centre.

Members seeking further information regarding NSW Department of Justice mediation processes should contact the General Manager or refer to the *NSW Community Justice Centres Act 1983* or website <http://www.cjc.justice.nsw.gov.au/>.

## 7. Misconduct complaints

### 7a. When must a misconduct complaint be made.

A misconduct complaint must be made, in writing, within three months of the alleged conduct occurring or within three months of the complainant becoming aware of the alleged conduct.

A misconduct complaint made after three months may only be accepted if the General Manager, or, in the case of a complaint about the General Manager or member of the Board of Management, the majority of the Board of Management, is satisfied that there are compelling grounds for the matter to be investigated.

## 7b. Misconduct complaint against an ordinary member who is not an employee, office holder or Board of Management member

Misconduct complaints against members are to be conducted in accordance with the APSI Complaint and Grievance Management Policy.

Complaints regarding minor misconduct of members should be in writing. Where a complainant can provide satisfactory explanation why a complaint in writing cannot be reasonably provided, a verbal complaint may be taken and documented in writing by the receiver of the complaint. This written record should be validated and adopted as an accurate record by the complainant as soon as practicable following the verbal complaint.

Minor misconduct complaints and allegations should be managed at the lowest effective level in accordance with APSI Human Resources policies.

Minor misconduct complaints and allegations will be referred to a Technical Director or directly to the General Manager. The General Manager, in consultation with the Technical Director will assess and decide whether a matter should be further investigated. The General Manager may decide not to enquire into the matter on grounds that the complaint is trivial, frivolous, vexatious or not made in good faith.

Where the General Manager decides not to make enquiries into a minor misconduct complaint about a member, the General Manager must give the complainant reasons for their decision.

Complaints regarding serious misconduct of members should be in writing.

Serious misconduct complaints against ordinary members are to be referred to the Board of Management.

The Board of Management will assess or direct a matter to be further investigated by the General Manager or external investigator in accordance with the APSI Complaint and Grievance Management Policy.

Where the Board of Management decides not to make enquiries into a serious conduct complaint about a member, the Board of Management President on behalf of the Board, must give the complainant reasons in writing for their decision.

## 7.c Complaint against APSI employees including office holders

Conduct-related complaints against APSI staff are to be conducted in accordance with the APSI Complaint and Grievance Management Policy.

The General Manager is responsible for making enquiries or causing enquiries to be made into serious conduct complaints about staff, and for determining the outcome of such complaints.

The General Manager may decide not to enquire into the matter on grounds that the complaint is trivial, frivolous, vexatious or not made in good faith. Where the General Manager decides not to make enquiries into a code of conduct complaint about a member of staff or office holder, the General Manager must give the complainant reasons in writing for their decision.

Enquiries made into staff or office holder conduct that might give rise to disciplinary action must occur in accordance with the relevant industrial instrument or employment contract and make provision for procedural fairness including the right of an employee to be represented by their union, legal representative or other support person.

Sanctions for staff and office holders depend on the severity, scale and importance of the breach and must be determined in accordance with any relevant industrial instruments or contracts. Depending on the nature of the conduct alleged, an employee may be temporarily stood down or have a restriction placed on their duties whilst the complaint is investigated.

Where the General Manager becomes aware of a possible breach of conduct by staff or office holders, he or she may initiate the process for the consideration of the matter under this Policy without a written complaint.

#### 7.d Handling conduct complaints against the General Manager

Conduct-related complaints against the General Manager are to be conducted in accordance with the APSI Complaint and Grievance Management Policy.

All conduct complaints about the General Manager are to be made to the Board of Management President in writing.

The Board of Management is responsible for making enquiries or causing enquiries to be made into serious conduct complaints about the General Manager and for determining the outcome of such complaints.

The Board of Management may decide not to enquire into the matter on grounds that the complaint is trivial, frivolous, vexatious or not made in good faith. Where the Board of Management decides not to make enquiries into a code of conduct complaint about the General Manager, the Board of Management President on behalf of the Board, must give the complainant reasons in writing for their decision.

To promote transparency, procedural fairness and avoid conflicts of interest, the Board of Management should engage an external investigator to make enquiries into serious conduct complaints against the General Manager.

Enquiries made into General Manager conduct that might give rise to disciplinary action must occur in accordance with the relevant industrial instrument or employment contract and make provision for procedural fairness including the right of the General Manager to be represented by their legal representative or other support person.

Depending on the nature of the conduct alleged, the General Manager may be temporarily stood down or have a restriction placed on their duties whilst the complaint is investigated.

#### 7.e Conduct Complaints against a Board of Management member

Conduct complaints against a Board of Management member are to be conducted in accordance with the procedures outlined in the APSI Complaint and Grievance Management Policy.

Depending on the nature of the alleged conduct, the Board of Management member may be temporarily stood down or have a restriction placed on their duties whilst the complaint is investigated.

Where the Board of Management President becomes aware of a possible breach of conduct by a member of the Board of Management, he or she may initiate the process for the consideration of the matter under this Policy without a written complaint.

To promote transparency, procedural fairness and avoid conflicts of interest, the Board of Management should engage an external investigator to make enquiries into serious conduct complaints against the President and any Board of Management member.

### 8. Sanctions / Disciplining of members

The APSI Constitution provides the authority to discipline / sanction members and employees for breaches or failure of service delivery and/ or misconduct.

Prior to imposing disciplinary sanctions against a member or staff, the Board of Management, General Manager or any person making enquiries on behalf of the general manager must comply with the requirements of procedural fairness.

Sanctions will be determined by the Executive members of the Board of Management.

Sanctions may include but not be limited to one or more of the following:

- a) Official written censure
- b) Pecuniary penalty
- c) The setting of a probationary period including clearly defined performance criteria
- d) Requiring the person to apologise to any person or organisation adversely affected by the breach
- e) Completion of such training as deemed necessary, in the case of members and employees by the General Manager, and in case of a Board of Management member, by the President
- f) Removing or restricting the person's delegations or authorities
- g) Removing the person from APSI membership.

#### 8.a Expulsion or suspension of membership

The APSI Board of Management may, by majority resolution, expel the member from the association or suspend the member from membership of the APSI if, after considering the complaint and any submissions made in connection with the complaint, it is satisfied that the facts alleged in the complaint have been proved and the expulsion or suspension is warranted in the circumstances.

If the Board of Management expels or suspends a member, the Administrator must, within 7 days after the action is taken, cause written notice to be given to the member of the action taken, of the reasons given by the Board of Management for having taken that action and of the member's right of appeal.

The expulsion or suspension does not take effect:

- (a) until the expiration of the period within which the member is entitled to appeal against the resolution concerned, or
- (b) if within that period the member exercises the right of appeal, unless and until the association confirms the resolution

whichever is the later.

## 9. Right of Appeals

Where a determination of a complaint or grievance is made against a member, that member has a right of appeal.

Appeals must be lodged with the APSI in writing within seven days of service of resolution against the member. The Appeal notice may or may not state the reasons for the appeal.

Grounds for appeal may include but not be limited to:

- a) Significant failure by person/s to follow the APSI Complaints and Grievance Management Policy
- b) The discovery of new and significant information which would, on the balance of probabilities, alter a finding
- c) The severity of a sanction or disciplinary measure imposed.

#### 9.a Appeal of determinations in relation to Service Delivery

Appeals against sanctions imposed by the General Manager in relation to failures of service delivery may be made to the Board of Management.

The Board of Management may elect to do one of the following:

- Review only the written reasons for the appeal and considering the argument, vary, dismiss or uphold a sanction imposed
- Appoint a review panel, comprising two or more independent Technical Directors, of only the findings of the initial investigation and sanctions provided. This review panel shall provide a

- Request a second full investigation by an independent external investigator.

Nothing in this section is intended to, or has authority to limit or, constrain members seeking remedy via external administrative or judicial processes.

### 9.b Appeal of determinations in relation to Minor Misconduct

Appeals against sanctions approved by the General Manager in relation to minor misconduct may be made to the Board of Management.

The Board of Management may consider actions as detailed in service delivery appeals above.

### 9.c Appeal of determinations in relation to Serious Misconduct

Appeals against sanctions approved by the Executive Management Committee in relation to serious misconduct may be made to the Board of Management.

The appeal is to be determined by a simple majority of votes cast by the Board of Management with a deciding vote to be cast by the President if there is no majority.

Nothing in this section is intended, or has authority, to limit or constrain members seeking remedy via external administrative or judicial processes.

## 10. Related Documents

1. APSI Human Resource policies
2. Employment Contracts

## 11. Support and advice

For support and advice regarding this Policy contact:

APSI General Manager or Office Administrator

Email: [admin@apsi.net.au](mailto:admin@apsi.net.au)

Telephone: +61 (2) 6456 1255

## 12. Document Control

Name	APSI Complaints and Grievance Management Policy
Author	Lloyd Meehan – Associate member
Approver	Board of Management
Date of Issue	14 June 2019
Version Control	Draft Version 0.1 issued for consultation 26 August 2018
	Draft Version 0.2. Edits from A. Rae, A. Colville, D. Meehan
	Draft Version 0.3. Edits from L. Meehan – 5 October 18
	Draft Version 0.4 Edits from D Meehan – 19 October 2018
	Draft Version 0.5 Edits from A. Hill – 23 October 2018
	Final Edits agreed by Board of Management and incorporated by D Meehan – 25 May 2019
Review Date	30 June 2022