

**VERSION:**

3.1

**CREATED ON:**

19.01.2023

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30.06.2026

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## **POLICY**

### Grievance Handling and Procedure

#### Purpose

This policy outlines Squad Employment & Training, Smart Apprenticeship Solutions and Skill360 resolution pathways should staff members experience or witness unacceptable or unlawful behaviour in the workplace.

This includes acts of discrimination, harassment, bullying and a breach of policy or legal obligation that applies to our business.

This policy replaces all previous policies, whether written or not.

#### Scope

This policy applies to all employees employed by Squad Employment & Training, Smart Apprenticeship Solutions and Skill360, including all employees leased to a host employer.

It also extends to students engaged with Squad and Skill360's Registered Training Organisation (RTO) who may have complaints regarding their treatment or experiences in relation to the training services.

For the purposes of this policy, the terms "the employer" and "employees" collectively refers to the three employing entities and their respective staff.

For the purpose of this policy, the term *leadership team* refers to the CEO, GTO manager, RTO manager, and People & Safety Manager.

This policy replaces all previous policies, written or not.

#### Policy

The employer is committed to maintaining a workplace that encourages cooperation, collaboration and trust among all staff members.

On occasions, inappropriate behaviours may occur, and a grievance process is required to resolve complaints or concerns.

Employees can report grievances when:

- They have been victims of workplace harassment.
- Their health and safety have been compromised.

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- They've witnessed poor supervisor and/or management behaviour.
- Unjust changes have been made to the employment agreement.
- Policy guidelines are violated.
- There is a dispute between co-workers, suppliers, and/or management.

This policy applies whenever and wherever staff members are at work, even if this work is undertaken outside ordinary business hours or away from our offices.

This includes:

- Off-site training days.
- Company social and sporting events.
- Team celebrations.
- Stakeholder engagements, events and conferences.

### Dealing with a concern directly

We encourage all staff members to try to resolve issues arising from unacceptable workplace behaviour directly with the relevant parties in the first instance.

If a staff member is concerned about another person's behaviour and is comfortable doing so, we encourage them to raise the concern directly with that person in good faith. It is important to make all efforts to resolve the concern with the other person in a respectful, constructive and reasonable way that reflects the employer's values.

Lastly, the parties involved are expected to agree on a reasonable way of resolving the concern, which will be the end of the matter.

### Raising Concerns

Staff members may speak confidentially to their manager or a member of the leadership team if they would like to discuss how to deal with the concern directly with the other person.

If staff members have concerns about harassment, bullying or discriminatory behaviour, they should confidentially discuss how to deal with the concern with their manager.

#### **Internal Investigation**

If a concern is raised, it may be investigated by the employer in a way which is suitable in the circumstances. We may determine to follow an informal process, or to follow a formal process.

#### **Raising concerns with external agencies**

The employer or the complainant may elect to manage the entire process or any part of it internally or engage an independent external third party to assist in any aspect of the process.

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Third parties may include, but are not limited to, the following agencies involved in employment and training:

- Victorian Registration and Qualifications Authority - DESBT
- Training Services NSW - FairWork

**EAP Support**

The employer provides a free, confidential and independent Employee Assistance Program (EAP) to all members of staff.

Staff members may use the confidential EAP services to seek professional counselling on any work-related or non-work-related matter. This support is operated by a third party and is available 24 hours a day, 7 days a week.

**Conflicts of Interest in Related Entities**

As Squad Employment & Training, Smart Apprenticeship Solutions and Skill360 operates across multiple business functions, including Group Training Organisation (GTO), and Registered Training Organisation (RTO) services, there may be circumstances where a grievance involves more than one arm of the organisation.

For example, a GTO apprentice employed by Squad or Smart may lodge a complaint related to the delivery of training by the RTO arm of Squad or Skill360. These scenarios present potential conflicts of interest. The employer is committed to ensuring all grievances are managed fairly, transparently and without bias, even when they involve different business entities or functions under the same ownership structure.

**Approach****Conflict Identification:**

Where a grievance involves one or more related entities, such as a complaint raised by a GTO apprentice about the RTO, or vice versa, the first step is to identify whether a conflict of interest exists. This includes considering whether a personal, professional, financial or organisational interest could affect the impartial handling of the complaint.

**Independent Review:**

If a conflict of interest is identified, the complaint will be escalated to an independent manager from another part of the business not involved in the issue or to an external third-party reviewer. This is to ensure the matter is assessed objectively and fairly, with no undue influence from individuals or teams with a vested interest.

**Managing the Conflict:**

Where required, the employer will take appropriate measures to manage and mitigate the conflict of interest. This may include:

- Excluding staff members with actual or perceived conflicts from the investigation or decision-making process.

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- Engaging an external body or consultant to conduct the investigation
- Separating responsibilities for investigating and resolving the complaint across different business arms.

**Confidentiality:**

Strict confidentiality will be maintained throughout the process. All individuals involved, whether internal staff or external, are required to treat information related to the complaint with discretion. Breaches of confidentiality will be treated seriously and may result in disciplinary action.

**Resolution and Reporting:**

Outcomes of complaints involving multiple entities will be communicated to all parties involved in a timely and appropriate manner, maintaining confidentiality and professionalism. Where relevant, systemic issues identified through the process will be reviewed by the management team and acted upon to prevent future conflicts.

By adhering to these guidelines, the employer ensures that conflicts of interest are managed transparently and equitably, preserving the integrity of the complaint resolution process and maintaining trust across all arms of the organisation.

## Reporting a Complaint

**Reporting issues**

If the grievance remains unresolved despite best efforts to resolve it between the parties, or if the staff member is uncomfortable attempting to resolve it, they should:

- Approach their Manager or a member of the leadership team.
- Email **complaints@squad.org.au** or call **1300 784 787**.

If staff members are uncomfortable speaking with their direct manager, they may approach another Manager or a member of the leadership team for assistance.

**Response to issues**

In responding to written grievances, direct managers will take steps which include:

1. Ensure that staff members remain safe at work at all times;
2. Advise staff members of the processes to be expected;
3. Offer Employee Assistance Program (EAP) support; and,
4. Advise staff members who will be their point of contact during the process and resolution of the grievance.

The appropriate member of the leadership team will work to determine the best response, considering the perception of the seriousness of the grievance and how it can be resolved. These factors will be balanced against our understanding of the issues raised, our values, culture, and relevant policies and procedures.

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All parties involved need to ensure they maintain the appropriate degree of confidentiality regarding the existence and resolution of the matter.

## Resolution Procedure

### **Initial Resolution:**

- Employees are encouraged to speak immediately with the relevant Employer Representative to resolve the issue. This level of complaint is generally raised during mentor/training visits and is considered a simple complaint that the on-site employee can often resolve; this is generally the Workforce Development Coordinator, Employment Officer and Trainers.

### **Escalation:**

- If the complainant is not satisfied with the resolution provided by their Employer Representative or the Employer Representative is unable to assist, the issue will be escalated.
- The Employer Representative will invite the complainant to lodge a formal complaint by emailing **complaints@squad.org.au** and escalate the matter to their Manager or a member of the leadership team.

### **Formal Complaint Process:**

- The complaint should outline:
  - Details of the complainant (name, email address, mobile phone number).
  - Details of the other person(s) involved in the complaint (name, email address, mobile phone number).
  - Date of the incident.
  - Details of the complaint.
- Grievances/complaints should be lodged as soon as possible after the incident, or at least within 7 days.

### **Acknowledgment and Investigation:**

- An email received via **complaints@squad.org.au** will constitute a formal complaint.
- The Leadership team must be informed of all formal complaints immediately upon lodgement.
- Receipt of the complaint will be acknowledged within 2 working days.
- The Leadership team will initiate a transparent, participative investigation to identify the issues.
- Complaints, where possible, are to be resolved within 14 calendar days of lodgement.

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**Review and Outcome:**

- Complaints will be reviewed during each managers' meeting and the HRHS Committee meeting for continuous improvement purposes.
- The complainant will be advised in writing of the outcome of their complaint within 7 days of resolution.

**Escalation to CEO:**

- If the outcome is not satisfactory to the complainant, they may seek an appointment with the CEO.
- If the complainant is still dissatisfied after meeting with the CEO, they have the right to seek outside assistance to pursue the complaint.

**Confidentiality**

All parties involved are expected to maintain confidentiality in relation to the existence, process, and resolution of the complaint to ensure fairness and privacy for all individuals involved.

**Relation Links**

[National Employment Standards | Fair Work Commission](#)

[Contact us - Fair Work Ombudsman](#)

[Training Services complaint or compliment form | NSW Government](#)

[Contact us | Department of Trade, Employment and Training](#)

[Make a complaint | vrqa.vic.gov.au](#)

**Contact Information**

For further information about this policy, please contact:

CEO – 0478 477 128 or [ceo@squad.org.au](mailto:ceo@squad.org.au)

HRHS – 1300 784 787 or [hrhs@squad.org.au](mailto:hrhs@squad.org.au)