

STAFF GRIEVANCE AND INTERNAL COMPLAINTS POLICY

NATIONAL QUALITY STANDARD (NQS)

QUALITY AREA 4: STAFFING ARRANGEMENTS		
4.1.1	Organisation of educators	The organisation of educators across the service supports children's learning and development.
4.1.2	Continuity of Staff	Every effort is made for children to experience continuity of educators at the service.
4.2	Professionalism	Management, educators and staff are collaborative, respectful and ethical.
4.2.1	Professional collaboration	Management, educators and staff work with mutual respect and collaboratively, and challenge and learn from each other, recognising each other's strengths and skills.
4.2.2	Professional standards	Professional standards guide practice, interactions and relationships.
QUALITY AREA 7: GOVERNANCE AND LEADERSHIPS		
7.1.2	Management Systems	Systems are in place to manage risk and enable the effective management and operation of a quality service that is child safe.
7.2.1	Continuous Improvement	There is an effective self-assessment and quality improvement process in place.

EDUCATION AND CARE SERVICES NATIONAL LAW AND NATIONAL REGULATIONS	
S. 2A	Paramount consideration—safety, rights and best interests of children
S. 3A	Paramount consideration
S.166A	Offence to subject child to inappropriate conduct Offences relating to inappropriate conduct
S. 172	Offence to fail to display prescribed information
S.174	Offence to fail to notify certain information to Regulatory Authority
12	Meaning of serious incident
168(2)(o)	Education and care service must have policies and procedures... for dealing with complaints
170	Policies and procedures must be followed
171	Policies and procedures to be kept available
173(2)(b)	Requires an approved provider to make the name and telephone number of the person to whom complaints may be addressed clearly visible at the service
176	Time to notify certain information to Regulatory Authority
183	Storage of records and other documents

RELATED CHILD SAFE STANDARDS	
1	Child Safety is embedded in organisational leadership, governance and culture.
4	Equity is upheld and diverse needs are taken into account
5	People working with children are suitable and supported
6	Processes to respond to complaints of child abuse are child focused
7	Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training.
10	Policies and Procedures document how the organisation is Child Safe

RELATED POLICIES

Child Protection Policy	Incident, Injury, Trauma and Illness Policy
Child Safe Environment Policy	Interactions with Children, Family and Staff Policy
Code of Conduct Policy	Privacy and Confidentiality Policy
Grievance and Complaints Policy (Staff)	Protected Disclosures (Whistleblower) Policy
Enrolment Policy	Maintenance of records Policy
Communication Policy	Responsible Person Policy
Management Committee Policy	Safe Use of Digital Technologies and Online Environment Policy

PURPOSE

Activity Centres Incorporated (ACI) is committed to a respectful, positive and professional workplace where everyone feels safe and supported. From time-to-time concerns and grievances will arise, and that is normal. This policy explains how to raise a concern and how ACI will handle it, fairly, promptly and with care for everyone involved. Handling grievances well protects our people, our culture, and the children and families we serve.

SCOPE

This policy gives ACI staff a clear, reliable way to raise concerns and have them dealt with fairly. It covers two closely related things:

- **Grievances**- a concern a staff member has about their own work, their treatment at work, or the conduct of others at work. This includes workload or roles, communication, workplace culture, and conduct between colleagues.
- **Internal complaints**- a concern a staff member raises about the service or its operation, such as a process, a decision, a policy, or the way something is being run.

Both are raised internally by staff and are handled through this single policy. It works alongside ACI's other policies, which are listed in this policy.

This policy is for staff. It does not cover complaints from parents, families, children or the community, which are handled through ACI's separate **Grievance and Complaints Policy (Families and Community)**. If a staff member is ever unsure which policy applies, they can ask their Service Coordinator or the General Manager.

1. THE PRINCIPLES WE FOLLOW

- **Fairness.** Everyone involved in a grievance is treated fairly. Where a concern is about a person's conduct, that person is told what has been raised and given a genuine opportunity to respond before any decision is made.
- **Timeliness.** Concerns are acknowledged quickly and worked through without unnecessary delay.
- **Confidentiality.** Information is shared only with those who need to know to resolve the matter. Everyone involved is expected to keep the matter confidential.
- **No detriment.** No one will be disadvantaged for raising a genuine concern in good faith. Retaliation against a person for raising or being involved in a grievance is itself a serious breach of this policy.
- **Respect and safety.** Everyone is entitled to a workplace where they feel emotionally and physically safe. Concerns that affect people's wellbeing are taken seriously and treated as a priority.

2. WHO TO RAISE A CONCERN TO

So that concerns reach the right person and can be acted on quickly, please use the following routes.

If your concern is about...	Raise it with...
A colleague, your team, your workload or role, workplace culture, or any day-to-day matter at your service	Your Service Coordinator in the first instance. If it cannot be resolved there, or the concern is broader than your service, it goes to the General Manager
A matter your Service Coordinator cannot resolve, or that involves more than one service, or the conduct of a Service Coordinator	The General Manager who has oversight of all staffing and operational matters across ACI.
The General Manager	The nominated Management Committee contact ACI President at aciparentcommittee@gmail.com This route does not go through the General Manager, so a concern about management can be raised safely.

This structure matters. The General Manager is responsible for the day-to-day leadership and people management of ACI's services. Routing staffing concerns to the General Manager means they reach the person accountable for acting on them, and means concerns are dealt with operationally and promptly rather than being held up. The only exception is a concern about the General Manager, which has its own separate and confidential route to the committee so that no one ever has to raise a concern about management with the person it involves.

A note for committee and managers

Staffing and operational grievances are the General Manager's responsibility and should flow to them, not to the Management Committee. The committee's role is limited to concerns that are specifically about the General Manager, and to governance oversight of the policy itself. Keeping this line clear ensures grievances are handled quickly by the person accountable for them, and that the General Manager has the full oversight they need to lead the team.

3. HOW A GRIEVANCE OR COMPLAINT IS HANDLED

Most concerns are best resolved simply and early. Whether the matter is a grievance or an internal complaint, the steps below apply, and they scale to the seriousness of the matter.

Step 1: Raise it

Raise your concern with the appropriate person above, in person or in writing. You are welcome to bring a support person. It helps to be specific: what happened, when, who was involved, and what outcome you are hoping for.

Step 2: Acknowledge

The person receiving the concern will acknowledge it promptly, normally within [2 to 3] working days, and let you know what will happen next.

Step 3: Look into it fairly

The matter will be looked into in a way that fits its seriousness. This may involve gathering more detail, speaking with the people involved, and, where the concern is about someone's conduct, putting the specific concerns to that person and giving them a genuine opportunity to respond before any conclusion is reached. Simple matters may be resolved through an informal conversation; more serious matters may need a more formal process.

Step 4: Resolve and follow up

ACI will work towards a fair and practical resolution, keep those involved reasonably informed, and follow up to make sure the resolution has held. Where wrongdoing is found, it will be addressed appropriately, which may include action under the Code of Conduct.

4. WHEN A CONCERN INVOLVES CHILD SAFETY

This is the most important boundary in this policy. If a grievance ever involves, or comes to involve, the safety, health or wellbeing of a child, it stops being an ordinary staff grievance and must be dealt with immediately under ACI's child safety and reporting obligations, not through the ordinary steps above.

This includes any concern or allegation that: a serious incident has happened or may have happened at a service; the National Law or National Regulations may have been breached; a child's safety, health or wellbeing may have been compromised; or that a child may have experienced harm or abuse. Concerns of this kind carry legal obligations, including time-critical notification to the Regulatory Authority and, where relevant, reporting under child protection and reportable conduct requirements.

Anyone who becomes aware of a matter like this must raise it immediately with the Nominated Supervisor or the General Manager, who will ensure it is actioned under ACI's *Grievance and Complaints Policy*, *Child Safe Environment Policy* and *Child Protection Policy*. These obligations take priority over this policy and cannot be delayed. If there is ever any doubt about whether a matter falls into this category, treat it as though it does and raise it straight away.

Two separate pathways

Ordinary workplace grievances (how staff work together, roles, culture, conduct between colleagues) are handled through this policy. Anything touching a child's safety, a possible breach of the National Law or Regulations, or a serious incident is handled through ACI's child safety and reporting policies, on their own timeframes. Keeping the two clearly separate protects both children and staff.

5. SERIOUS MATTERS

Some concerns need particular care and priority. These include concerns that staff feel emotionally or physically unsafe at work, allegations that false or damaging information is being spread about a staff member, breaches of confidentiality, and any conduct that seriously undermines trust or wellbeing in the team. Matters of this kind will be treated as a priority and handled promptly, because a safe and respectful workplace is not optional.

Where a concern involves possible serious misconduct, it will be investigated fairly, and if substantiated may result in disciplinary action up to and including termination of employment. No outcome is decided in advance; the point of a fair process is to establish what has actually happened before any action is taken.

If a complaint alleges the safety, health or wellbeing of a child is being compromised, the Nominated Supervisor or Manager will notify the regulatory authority within 24 hours. Notification must include any incident where there is a reasonable belief that physical and/or sexual abuse of a child has occurred or is occurring at the service or any allegation that sexual or physical abuse of a child has occurred or is occurring at the Service.

- Early Learning Commission (Regulatory Authority) Contact details:
 - Phone: 1800 619 113 (toll free)
 - Email: information@earlylearningcommission.nsw.gov.au

6. CONFIDENTIALITY AND GOOD FAITH

Everyone involved in a grievance, including the person raising it, must keep the matter confidential and discuss it only with those who have a legitimate role in resolving it. Discussing a grievance more widely, or sharing information about colleagues, undermines the process and the trust it depends on.

This policy is for genuine concerns raised in good faith. Knowingly raising false or malicious complaints, or spreading inaccurate information about a colleague, is not consistent with this policy and may itself be treated as misconduct.

7. SUPPORT

Raising or being involved in a grievance can be stressful. Staff are encouraged to seek support, whether from a trusted colleague, their own networks, or any employee support ACI makes available. Anyone involved in a grievance is welcome to have a support person with them at meetings.

A support person may provide support by:

- taking notes during the meeting
- clarifying questions asked
- clarifying any allegations made
- help formulate responses
- engage in discussions and are more than a passive observer
- aid in understanding processes
- request breaks
- emotional support.

A support person cannot:

- represent the employer
- speak on their behalf
- advocate for the organisation

In short

If something is wrong, tell the right person, and it will be taken seriously, handled fairly, and dealt with promptly. Staffing concerns go to your Service Coordinator and then the General Manager. Concerns about the General Manager go to the committee contact. Everyone is treated fairly, nothing is decided before it is properly looked into, and no one is disadvantaged for speaking up in good faith.

SOURCES

Australian Children’s Education & Care Quality Authority. (2026). *Guide to the National Quality Framework*

Australian Children’s Education & Care Quality Authority. (2023). *Using Complaints to support continuous improvement.*

Australian Human Rights Commission: <https://www.humanrights.gov.au>

Children (Education and Care Services) National Law (NSW)

Education and Care Services National Law Act 2010.

Education and Care Services National Regulations. (Amended 2025)

Fair Work Australia: <https://www.fairwork.gov.au/>

HR Culture

REVIEW

POLICY REVIEWED BY	Jessie McCulloch & Susan Judd (HR)	Role: Manager and HR	Date: 09/07/2026
ENDORSED BY 2 PARENT COMMITTEE MEMBERS (initial/date)	A.G & K.K 09/07/26	UPDATES/MODIFICATIONS	-Created new staff specific Complaints and Grievance Policy in consultation with HR Culture
NEXT REVIEW DATE: July 2027			