

GRIEVANCE POLICY

1. Overview

GPT aspires to be a workplace in which all employees respect each other's diverse range of experiences and backgrounds. To maintain a high performing work environment, GPT aims to provide its employees with various mechanisms to express grievances and have them resolved in a fair, equitable and prompt manner.

2. Purpose

This policy sets out GPT's approach to providing a safe and harmonious work environment and provides a guideline to facilitate the resolution of complaints, grievances or problems raised by employees.

3. Scope

This policy applies to all GPT employees whether on a permanent, casual, temporary or fixed-term contract basis. While employees are required to comply with the terms of this policy, this policy does not form part of any employee's employment contract and may be reviewed, amended or withdrawn from time to time, at the absolute discretion of GPT.

4. Policy

This policy is a guideline only and GPT reserves absolute discretion to determine the process to be followed in response to any grievance raised.

4.1 Direct Resolution Process

Generally, for grievances of a less serious nature, an early resolution process can often be an appropriate method of resolution. This usually consists of a direct discussion between the relevant parties to resolve the issue. Where an employee does not feel comfortable with raising an issue directly with the person concerned, or the issue is potentially more serious in nature or cannot be resolved through a direct discussion, the employee should approach their line manager or People & Performance.

On occasion, this process may be facilitated or mediated by a manager or a member of the People & Performance team. More frequently however it generally takes the shape of a direct discussion being held between the affected parties where the issue is resolved in that setting. Done at an early point and in a constructive fashion, many minor disputes and issues can be adequately resolved to the satisfaction of all participants in this way.

The reaching of a resolution directly between the parties does not prevent GPT from taking any other action that it considers appropriate in response to a grievance. For example, in circumstances where an informal resolution is reached between parties, and GPT is of the view that the information disclosed in the grievance poses a potential risk to the health and safety of GPT employees, GPT may in its absolute discretion determine that a secondary response to the grievance is required.

4.2 Formal Grievance Handling Process

For grievances of a more serious or sustained nature, or where the direct resolution process has been unsuccessful, a formal grievance handling process may be followed. When a formal grievance handling process is followed, it will generally have the following features:

- **Confidentiality** – The grievance will only be discussed with others on a “need to know” basis (to the extent this is reasonably possible). These individuals may, for example, include the parties directly involved in the incident, witnesses, those who may make a decision on potential disciplinary action, and those involved in the investigation.
- **Fairness** – Grievances will be handled fairly and impartially with a view to obtaining a fair and timely outcome for all parties. Any investigation will also be conducted in a fair and impartial manner.

- **Sensitivity** – Certain grievances may involve particularly personal information about the individuals involved. This information will be dealt with in a sensitive fashion, as appropriate.
- **No Victimisation** – All persons (*i.e.* the complainant, the person(s) complained about, and any witnesses) involved in a formal grievance will be advised that any form of victimisation or reprisal against any other person involved or suspected to be involved in the grievance will result in disciplinary action, which may include termination of employment.

4.2.1 Steps in the Formal Grievance Handling Process

The formal grievance handling process will include such steps as may be determined to be appropriate by GPT based on the nature of the grievance. These steps may include some or all of the following:

1. **Notification:** An employee may raise a formal grievance with their manager, who will then advise People & Performance. If it is not appropriate to raise the matter with the employee's manager, then the grievance can be raised directly with People & Performance. Certain grievances of a serious nature may be more appropriately reported and dealt with in accordance with GPT's Whistleblower Policy, a copy of which can be located on Skyline (GPT's intranet).
2. **Early resolution:** If an opportunity presents for People & Performance to mediate or facilitate a solution to the dispute at an early stage, and it is appropriate to do so, then this may be attempted.
3. **Investigation:** Depending on the nature of the grievance, an investigation may be necessary to clarify what has occurred and to determine the best course of action to resolve the issue. Any investigation will be conducted by People & Performance (or a delegate, for example, Risk) and will involve speaking with people who are involved in the grievance. This will generally involve one or more interviews with both the complainant (to establish the relevant information relating to the complaint) and the person(s) complained about (to obtain a response to the issues raised from the person(s) complained about). The investigation may also involve speaking with witnesses and/or obtaining and reviewing relevant documentation, files, emails, phone records, etc.
4. **Outcomes:** Based on all of the available information, including the findings of any investigation, People & Performance will determine whether the allegations of the grievance have been substantiated and what actions will be taken in response. Such actions may, for example, involve disciplinary action, up to and including termination of employment, and/or ongoing monitoring of the situation.
5. **Reporting Back:** Where appropriate, People & Performance will report back to the complainant and the person(s) complained about regarding the outcome of the investigation.

A formal grievance handling process can result in a range of possible actions which may or may not include disciplinary action (which, if it occurs, may include termination of employment). It should be noted that if a formal grievance is found to be without basis, or made in a frivolous or vindictive fashion, the individual lodging the complaint may be subject to disciplinary action, outcomes of which may include termination of employment. Further explanation of disciplinary action and outcomes can be found in Appendix 1 of the Code of Conduct.

4.3 Reporting of Grievances

General statistics outlining the number of grievances, themes and outcomes are periodically reported to the Leadership Team and Board to assist them in assessment and management of GPT's culture.

5. Roles and Responsibilities

Everyone who works at GPT is responsible for ensuring that they:

- are familiar with this policy;
- comply with this policy; and
- attend regular GPT training.

People who work in supervisory positions at GPT must also take all reasonable steps to ensure that the workplace is free from unacceptable behaviour and that any grievance raised by a team member is taken seriously and dealt with promptly in line with this policy.

6. Related Policies Procedures and Guidelines

- Code of Conduct
- Equal Employment Opportunity and Workplace Behaviour Policy
- Whistleblower Policy
- Please refer to the Workplace Conduct & Issue Resolution page on Skyline for a copy of the Grievance Resolution Flowchart

7. Ownership and Version Control

Policy Owner	Phil Taylor – Head of People and Performance
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Date	June 2019
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Revision Status	Approved
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Organisation	People and Performance

Revision	Description	Author
1	Original Version located intranet page	-
2	Policy review and Standard Format Adopted Final copy – approved by Chief Risk Officer 6 May 2014	Amanda Simpson
3	Policy review – 8 April 2016	Shey Hooper
4	Policy review – update to section 4. Policy	Amanda Neill
5	Policy review	Amanda Neill