



Talentpay Child-Related Complaint Handling & Incident Report Policy

Document Management

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Revisions

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Revision 1	Jess Kay	Head of Production	08/05/2025
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Policy

Objective

Talentpay is committed to providing an environment where children are treated equally and with respect, and kept safe from abuse. The purpose of this policy is to provide you with a framework to raise complaints or report incidents in a timely and confidential manner. We recognise the importance of sensitivity, confidentiality and objectivity in the resolution process and will ensure all reasonable steps are taken to respect the confidentiality of the people involved in a complaint or incident and encourages all parties to raise a complaint or report an incident without fear of disadvantage or victimisation.

This policy applies to:

- All employees (full-time, part-time, casual) and contractors
- Parents, children, and any other adult working alongside children

Responsibilities

Talentpay's Responsibilities

It is Talentpay's responsibility to ensure that:

- Managers are empowered to educate their teams on a regular basis about the existence of this Policy, what constitutes a reportable allegation, and their rights and responsibilities in relation to implementing this procedure;
- any breach of this Policy is dealt with in a fair and consistent manner; and
- when a complaint or incident report is made, and escalation is required, the HR Manager and Child Safety Officer will determine if reasonable grounds exist to commence an investigation, co-ordinate any such investigation and decide any necessary reporting or disciplinary requirements based on the outcome of the investigation.

Manager Responsibilities

Managers are required to:

- Work with Team Members to resolve any complaint or incident report in a timely and consistent manner;
- liaise with the HR Manager and their Head of Department to determine if a formal investigation is required; and
- in the case of a formal investigation, review and recommendations of the investigation and assist in the determination of the most appropriate course of action.

Team Member Responsibilities

Team Members are required to:

- Report any incidents or concerns as soon as possible.
- engage in resolution procedures in good faith; and
- be committed to working towards a solution.



Types of complaints covered by this policy

- Dissatisfaction with Talentpay's services or the services of another person or entity involved in the child-related work
- Suspicions, concerns, or allegations of misconduct, ranging from minor breaches of the code of conduct (for example, a crew member accidentally swearing or discussing inappropriate topics in earshot of a child) to serious or potentially criminal misconduct
- WHS concerns or incidents which place a child's physical safety at risk or result in injury or illness to a child
- Allegations of incidents of bullying or discrimination committed against a child or witnessed by a child
- Allegations of child abuse
- Reports of witnessed incidents of misconduct, bullying, discrimination, or abuse.

Anyone may make a complaint, whether they are the victim, a witness, or a person who has reasonable grounds to believe misconduct, discrimination, bullying, or abuse has occurred.

What are your options if you have a complaint, safety or wellbeing concern, or need to make an allegation of discrimination or abuse?

Deal with the matter informally.

A complaint may be suitable for informal resolution if:

- The complaint, based on the available information, appears to have arisen from a misunderstanding, miscommunication
- The breach was inadvertent
- The complainant is willing to resolve the matter informally

The Child Supervisor or Production Manager may approach the person involved to tell them that their behaviour, decision, actions, etc. was unfair, offensive, discriminatory, etc., and why. The complainant may be present for the conversation or choose not to be involved.

This may not be appropriate in some cases, particularly if the complainant does not feel comfortable speaking to the person involved.

Make a formal complaint or report

If you wish to make a formal complaint or report, or are required to do so under this policy, this can be done in a number of ways:

- Verbally – speak to the Child Supervisor, or Production Manager on set, or call the Child Safety Officer
- In writing – fill out a feedback or incident form (available from the Talentpay Supervisor)
- After the shoot – email your concern to team@talentpay.com.au or call 02 8204 4700.



If you are not comfortable making a formal complaint yourself, you may ask a parent, the child's agent, a community leader or advocate, or the Child Supervisor, to make the complaint on your behalf.

If you are unsure whether you should make an informal or formal complaint, speak to your Manager (Talentpay staff) or the Child Supervisor (children, parents, adults on set). They will help you make a decision. They may seek your approval before doing anything — although sometimes they may decide that acting will be necessary, even if you do not wish for them to do so (for example, where failure to do so poses a risk to the child's safety).

What Happens With Formal Complaints?

All formal complaints will be:

- Received by the TP Supervisor or Production Manager (on set) or the Child Safety Officer (if made after the shoot)
- Escalated internally to the Child Safety Officer
- Investigated respectfully and confidentially, following our internal procedures as described below.
- You will be consulted and kept informed whilst the investigation is in progress, with periodic updates at intervals to be agreed with the Child Safety Officer.
- Responded to promptly with details of the outcome, with a focus on resolution, safety, and care
- For concerns that involve misconduct or potential breaches of law, we may also be required to notify external authorities.

What to do if someone reports a concern to you

- Listen calmly, patiently, and supportively. Do not ask leading questions or ask the complainant to repeat themselves, except for the purpose of documenting what was said if necessary.
- If the complaint is made by a child, reassure them that they are doing the right thing in speaking to you, and that you are taking what they say seriously. Ask what they need from you to feel safe. Ask if they have spoken to their parent/guardian yet.
- If the complaint is made by an adult or a child on behalf of another child, ask if they have discussed the matter with the child already or informed the child that a complaint is being made on their behalf.
- If you can resolve the complaint yourself, do so in accordance with this policy.
- If you cannot resolve the complaint yourself, complete an incident report form, or contact the Child Safety Officer or Child Supervisor to take your report.
- If appropriate, keep the complainant informed of the steps that may be taken following the disclosure.

When does a complaint or incident report warrant a formal investigation?

A formal investigation must be conducted if there are reasonable grounds to believe that a breach of Talentpay's policies or an act of child abuse has occurred, or that there is a risk of child abuse occurring.



What support options are available to children and their families during a formal investigation?

Counselling can be made available to children and their families through Talentpay's Employee Assistance Program if required.

For children and families from Aboriginal and other culturally and linguistically diverse backgrounds, Talentpay will consult with, and make arrangements for support to be provided by, a community leader or advocate if needed.

Formal Investigation Procedure

If the HR manager determines that a formal investigation is to be conducted, an investigator will be appointed, which may be someone external to the organisation. The role of the investigator is to review the matter fairly, equitably, and objectively to determine the facts and recommend any further actions that may be necessary. The investigation may include the following steps:

- Initial response – the complainant will be notified that a formal investigation has been opened and any immediate action that may be taken.
- Evidence gathering – this may include interviewing the relevant parties and any potential witnesses, reviewing any footage of the incident, inspecting the incident site, providing the Respondent an opportunity to respond to any concerns raised, and collating any other available evidence.
- Assessment of evidence
- Compiling an investigation report
- Communicating findings
- Taking action

Complainants will be kept informed of the progress of an investigation at each stage, and will receive a copy of the investigation report when the investigation is complete.

See the National Office for Child Safety's Complaint Handling Guide for further guidance on complaint investigations.

Possible Outcomes

The outcomes of a formal investigation will depend on the nature of the complaint or allegation and the investigator's findings. Possible outcomes and actions may include:

- Acknowledgement of and apology for the incident or conduct
- Explanation of what happened
- Policy or process review
- Management or disciplinary action (refer to Talentpay Disciplinary Policy)
- Reporting to child protection bodies or police
- Provision of counselling or support



Both the complainant and the subject of the complaint may request a review in writing upon receiving details of the findings and outcome of an investigation if they are not satisfied with either the outcome or the handling of the complaint. The review may be conducted by either an internal staff member not involved in the original investigation, or an external consultant if the original investigation took place internally.

Irrespective of whether or not a complaint is proved, the matter will be taken into consideration to review and update internal policies, procedures, and training.

Confidentiality

All parties involved in an investigation must maintain confidentiality in accordance with Talentpay's privacy policies, except where disclosure of a reported concern or allegation is required by law. If you are not certain in relation to the confidentiality requirements of a given situation, contact your manager (internal staff) or the Child Safety Officer (parents/children/external complainants) for clarity prior to discussing the matter with anyone not directly involved.

There may be cases where it is necessary to share information with other persons, organisations, or government bodies if doing so is in the best interest of the child, necessary to ensure the safety of a child, or required by law. In such circumstances, the complainant and the subject of the complaint will be notified that this action must be taken.

Only the HR Manager or Legal & Compliance Officer is authorized to make decisions regarding information sharing, and if information is shared, records must be kept as to the legal basis relied on to share the information and who the information was shared with.

When Must a Complaint be Reported to Police or Child Protection Bodies?

Talentpay will comply with relevant state and territory Mandatory Reporter requirements where applicable. If in doubt, consult Legal & Compliance as to whether a complaint must be reported.

Where Talentpay is not a mandatory reporter, we will nevertheless report the following matters to police, child protection, or working with children check bodies, when it is deemed necessary to prevent harm:

- Allegations of child abuse which have been corroborated by at least one eyewitness at the time of occurrence, or which have been verified through formal investigation
- Allegations of criminal conduct
- Serious misconduct that may constitute grooming behaviour

If a child is in immediate danger, all Talentpay staff and Child Supervisors are required to call 000.

Record keeping

All written complaints, incident reports, investigation reports, and other relevant documentation pertaining to a complaint or incident report will be kept on file for a period of up to 7 years. Copies of records may be made available to police or government bodies if required for an investigation. Copies may also be requested by children or their parents, provided that the parent is not the subject of the complaint. No other party may access complaint records except where express written consent has been provided by the parent or where required by law.



Continuous Improvement and Policy Review

Talentpay is committed to continuously improving our child-safe practices. We regularly review these guidelines, and make necessary adjustments to improve our approach and meet the evolving needs of children and the community.

Review

This policy will be reviewed when required by changes in legislation or changes within company operations.