



Talentpay 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 all employees, contractors, cast and crew 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
- Anyone working alongside Talentpay employees and contractors

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 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 any 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

This policy applies to any and all incidents of bullying, discrimination, or harassment against a Talentpay employee or contractor, or committed by a Talentpay employee or contractor towards another individual.

Anyone may make a complaint, whether they are the victim, a witness, or a person who has received an allegation of such conduct from a victim or witness.

What are your options if you have a complaint?

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 or miscommunication
- The complaint pertains to microaggressions or similar behaviour which the complainant does not believe was intended to cause harm
- The complainant is willing to resolve the matter informally
- The complainant, or a Manager on their behalf, 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, or if the complainant believes the conduct was deliberately intended to cause harm or offence.

Make a formal complaint or report

If you wish to make a formal complaint or report, this can be done in a number of ways:

- Verbally – speak to your Manager, the HR Manager, or another member of staff whom you trust. Cast or crew on set can call 02 8204 4700 to speak to a Talentpay representative if there is not one on set.
- In writing – fill out an incident form and submit it to the HR Manager
- Via the feedback form on Talentpay's website
- If you are not comfortable making a formal complaint yourself, you may ask a trusted friend, colleague, or Manager, 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 Talentpay HR Manager (cast and crew on set). They will help you make a decision.

What happens with formal complaints?

All formal complaints will be:

- Received by the HR Manager
- Investigated respectfully and confidentially, following our internal procedures as described below.
- Responded to promptly with details of the outcome, with a focus on resolution.
- For concerns that involve serious misconduct or potential breaches of law, we may also be required to notify external authorities.

What support options are available during a formal investigation?

Counselling can be made available to employees through Talentpay's Employee Assistance Program if required.

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.

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)
- 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 the HR Manager for clarity prior to discussing the matter with anyone not directly involved.

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.

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.

Review

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