

COMPLAINTS AND GRIEVANCE POLICY

RIMPA GLOBAL

RECORDS AND INFORMATION MANAGEMENT
PRACTITIONERS ALLIANCE

Advancing and Connecting the Records and Information
Management Profession.

Contents

1	Document Control	3
2	Related Policies, Procedures or Documents	3
3	Amendment, Modification or Variation	3
4	Purpose	4
5	Scope	4
6	Definitions	4
7	Policy Statement	4
8	Principals.....	5
9	Complaints and Grievances.....	5
10	Dispute Resolution Process	6
10.1	Receiving a Complaint	6
10.2	Complaint Resolution	6
10.3	Receiving a Grievance	6
10.4	Appointing an Investigator	6
10.5	Appointing an Investigation Committee	6
10.6	Undertake Preliminary Assessment	7
10.7	Informing the Respondent(s)	7
11	Conduct Interviews.....	7
11.1	Interview the Complainant(S)	7
11.2	Interview the Respondent(s).....	8
11.3	Collect Additional or Supporting Evidence	8
11.4	Discussions and Resolutions.....	8
11.5	Facilitation	9
11.6	Mediation	9
11.7	Referral to the Relevant Authority.....	9
11.8	Decisions of Investigation.....	9
11.9	Appeals	9
12	Management of Investigation Records	9

1 Document Control

VERSION	DATE	AUTHORS	APPROVAL	COMMENTS
1.0	16 October 2020	Ally Watson	RIMPA Global Board	
2.0	14 July 2022	Anne Cornish	RIMPA Global Board	
3.0	18 November 2024	Governance and Risk Committee	RIMPA Global Board	Flying Minute 24/13

2 Related Polices, Procedures or Documents

NUMBER	DOCUMENT NAME	INTERNAL OR EXTERNAL
1.0	Code of Conduct	External
2.0	Constitution	External
3.0	Privacy Policy	External
4.0	Risk Management Plan	Internal
5.0	Sexual Harassment Policy	External
6.0	Whistleblower Policy	External
7.0	Workplace Health & Safety Policy	Internal

3 Amendment, Modification or Variation

This Code of Conduct is effective from 18 November 2025 and is reviewed every two years.

This Code of Conduct may be amended, varied, or modified by the Records and Information Management Practitioners Alliance Global (RIMPA Global) Board.

4 Purpose

The purpose of this policy is to provide an approach for RIMPA Global directors, employees and members to lodge complaints and grievances relating to professional misconduct. In addition to equipping the Investigation Committee with the mechanisms to ensure complaints and grievances are handled and resolved in an appropriate, fair, transparent and timely manner, in accordance with the RIMPA Global Constitution and the RIMPA Global governance framework.

5 Scope

This policy applies to all complaints and grievances raised by or against Directors, employees or members of RIMPA Global in relation to professional misconduct as per the Constitution.

6 Definitions

Company: Records and Information Management Practitioners Alliance (RIMPA Global)

Complaint: A concern or informal complaint which refers to any accusation or allegation

Complainant(s): The person who makes a complaint

Director: An elected Director or a person appointed a specialist by the Board (independent Director) to manage the business of RIMPA Global in accordance with the RIMPA Global Constitution

Employee: An individual formally employed by RIMPA Global, including the CEO

Grievance: A formal complaint raised regarding a violation of company policy or employment contract terms

Investigator: The person appointed by the Board to manage a complaint

Investigation committee: The committee appointed by the Board to manage a formal grievance process

Member: a person who has a specific membership with RIMPA Global, whose name appears on the register of members

Respondent(s): The person whom a complaint or grievance is made about

RIMPA Global people: The collective term for directors, members and employees.

7 Policy Statement

RIMPA Global is committed to fostering an environment where individuals feel safe, supported and are able to discharge their duties or engage with RIMPA Global without fear.

RIMPA Global recognises there may be occasions where inappropriate behaviours occur, and effective complaint and grievance resolution is important to ensure a healthy and productive environment.

This policy aims to ensure that complaints and grievances are handled and resolved in an appropriate, fair, transparent and timely manner, in accordance with the RIMPA Global Constitution and the RIMPA Global governance framework.

8 Principals

The principals are:

- RIMPA Global will take all reasonable steps and actions to ensure all RIMPA Global people will be treated fairly and with dignity and respect whilst working, volunteering or engaging in RIMPA Global activities
- complaints and grievances will be dealt with in a fair, consistent, timely way, ensuring sensitivity to all involved parties
- RIMPA Global will comply with its legal responsibilities in accordance with all relevant legislation
- all parties involved in a dispute resolution process are encouraged to participate in good faith and the principles of natural justice and procedural fairness are observed
- any breach of confidentiality may result in action taken in accordance with misconduct clauses of the RIMPA Global Constitution
- RIMPA Global will investigate anonymous complaints only when they are of a serious nature in accordance with the [Australian Human Rights Commission](#) and sufficient information is available
- RIMPA Global will keep accurate records of complaints and grievance matters
- all personal information collected under this policy, and all associated procedures will be managed in accordance with the RIMPA Global Privacy Policy

9 Complaints and Grievances

A complaint refers to any accusation, allegation or charge against another person or the company. Complaints are of a more informal nature in comparison to grievances.

A grievance is a formal lodgement of any complaint, concern or problem held by a Director, member or employee relating to legalities about professional misconduct, membership conditions and roles, job and employment conditions (employees only) or professional relationships within RIMPA Global.

Grievances may be lodged for various reasons, including but not limited to:

- harassment
- bullying
- health and safety
- behaviour
- adverse changes in employment conditions
- professional misconduct.

RIMPA Global people should attempt to resolve less important issues informally before resorting to submitting a formal grievance.

10 Dispute Resolution Process

Procedural fairness and transparency are crucial to an investigation in a professional setting. Reporting of illegal behaviour is not subject to this policy and should be referred to the appropriate Government authority. Maintaining procedural fairness means that:

- the interests of all parties are protected throughout the investigation
- the process is trusted and fair
- the investigation and its findings can be relied upon when making decisions
- decisions may be defended in legal proceedings

10.1 Receiving a Complaint

Complaints may be made verbally or in writing and are considered informal in the first instance. Complaints are lodged with the CEO or the Chair of the Board.

10.2 Complaint Resolution

The complainant(s) is encouraged to talk with the respondent(s) and attempt to come to a resolution. If an agreeable resolution cannot be reached, a formal grievance may be lodged.

A Director, member or employee may lodge a formal grievance without attempting informal resolution.

10.3 Receiving a Grievance

A grievance is submitted in writing to the CEO or the Chair of the Board to commence a formal grievance process.

All grievances should be referred to as allegations until the findings of the investigation are made.

10.4 Appointing an Investigator

An investigator is appointed by the investigation committee to manage the initial complaint process.

The investigator may be replaced by another investigator dependent upon the skillset required to formally investigate the allegation.

10.5 Appointing an Investigation Committee

An investigation committee as per the Constitution is appointed by the Board to manage the grievance process.

It is critical to ensure the investigation committee is impartial – they must have no personal interest or bias in the matter being investigated.

It is important to consider:

- whether the use of an external investigator is required
- what skills are required in the investigation committee

- whether any conflicts of interest exist
- if the nature of the complaint or grievance requires reporting to a government authority

10.6 Undertake Preliminary Assessment

The investigator will undertake an initial assessment of the allegation:

- in accordance with guidance from the committee, guidance material includes but is not limited to:
 - Sexual Harassment Policy
 - Complaints & Grievances Policy
 - Code of Conduct
 - Workplace Health & Safety Policy
 - Privacy Policy
 - Whistleblower Policy
 - Initial assessment checklist
 - Interview guidelines
 - Record keeping documentation templates
 - Risk management plan.
- to review the evidence provided
- to determine the validity of the allegation and decide:
 - if the allegation is substantiated and a claim for professional misconduct and requires further investigation and/or dispute resolution
 - there is sufficient evidence to undertake an investigation
- to report recommendations to the committee about the outcomes, actions and communication approach for the complainant(s) and respondent(s)

10.7 Informing the Respondent(s)

At the discretion of the investigation committee and depending on the severity of the allegation, the respondent(s) may be informed a grievance has been lodged with RIMPA Global and an investigation has commenced.

The details provided to the respondent(s) will be identified by the investigation committee at a time suitable for the investigation.

11 Conduct Interviews

11.1 Interview the Complainant(S)

An interview can be conducted by at least two members of the investigation committee with the complainant(s) within three months of the complaint/grievance being received.

The complainant(s) has the right to refuse attending formal meetings on their own and may bring a support person to the interview. The role of the support person is to provide emotional support during a meeting, take notes and adjourn the meeting for a break if required. The support person can represent the complainant(s) and can they advocate on their behalf.

Every effort should be made to obtain as much detail as possible throughout the interview to assist the investigation. The investigation committee will confirm in writing if the process is going forward and advise the complainant(s) that the complaint/grievance will be formally investigated.

If necessary, we may also disclose your personal information to any third party who has information relevant to your complaint. It is important to note where full anonymity has been requested, resolution of the grievance may be impacted due to an inability to provide/gather evidence.

11.2 Interview the Respondent(s)

It is vital to ensure the process is conducted in a procedurally fair manner. This involves sharing the allegations with the respondent(s) and providing them with an opportunity to respond. A response may include accepting the allegations as true, denying the allegations or explaining other circumstances relevant to the matter.

An interview can be conducted by at least two members of the investigation committee with the respondent(s) within a reasonable timeframe of the complaint/grievance being received.

The respondent(s) may bring a support person to the interview. The role of the support person is to provide emotional support during a meeting, take notes and adjourn the meeting for a break if required. The support person can represent the complainant(s) and can they advocate on their behalf.

The investigation committee should inform the respondent(s) of the investigation process to follow the interview.

11.3 Collect Additional or Supporting Evidence

The investigation committee should continue to investigate the matter by attempting to obtain any other relevant facts or evidence concerning the complaint or grievance. This may include, but is not limited to, interviewing relevant parties, other people (witnesses) and examining evidence such emails, online conversations or comments on the online RIMPA Global Community or other records.

11.4 Discussions and Resolutions

There are three levels of discussion available with the view to coming to an agreed resolution:

- 1) facilitation
- 2) mediation
- 3) referral to the relevant Authority.

11.5 Facilitation

Facilitation is a confidential, facilitated meeting between the involved parties. The aim of the meeting is to discuss and resolve issues between individuals with the view to developing an agreement which suits all parties. Facilitation should be presided over by the investigation committee, who has obligations to advise all parties of the expected behaviours as per the RIMPA Global Code of Conduct.

11.6 Mediation

Mediation is the process whereby the parties involved identify the issues, develop options, including appropriate alternatives and try to reach an agreement with the assistance of a neutral third party (a mediator).

The company should engage an external mediator for this process. A mediator's role is managing the mediation process. They have no advisory role or decision-making authority in regard to the content of an issue or resolution outcomes.

11.7 Referral to the Relevant Authority

Where the complaint and/or grievance either cannot be resolved or requires a relevant authority to be engaged, the investigation committee will liaise with the relevant government authority.

11.8 Decisions of Investigation

The Board may impose penalties to the respondent(s) as a result of the grievance investigation as per the RIMPA Global Constitution.

11.9 Appeals

All parties have the right to appeal a decision made by the investigating committee, to a member of the board.

12 Management of Investigation Records

All records associated with a complaint or grievance will be documented by all members of the investigation committee and will be managed by RIMPA Global Central Office in a secured case file available to the investigating committee, for a period of time defined in RIMPA disposal authority, or NAA records authorities in the absence of a RIMPA authority.