***Insert Company Name***

Delete this box and insert company logo

**Internal Grievance Mechanism**

|  |
| --- |
| ***General Instructions***1. *Insert the company logo in the header*
2. *Insert company name where indicated (“[insert company name]”)*
3. *Consider the guidance / follow the instructions given in the instruction boxes*
4. *Review the Internal Grievance Mechanism and customise accordingly, if required*
5. *Delete the instruction boxes throughout when the document is completed, including this box.*
 |

|  |  |
| --- | --- |
| **Document No.:** | XX |
| **Type of Document:**  | Procedure |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Version No.** | **Issue Date** | **REVIEWED by (Team Members)** | **Reviewed by****(Relevant Manager)** | **Approved** | **Signature** |
|  |  |  |  |  | Signature |
|  |  |  |  |  | Signature |
|  |  |  |  |  | Signature |
|  |  |  |  |  | Signature |
|  |  |  |  |  | Signature |
|  |  |  |  |  | Signature |

NOTE:

This document is controlled whilst it remains on the system. Printed copies created from this document are deemed to be uncontrolled unless specifically identified as being controlled from the day of printing.

**Amendments**

|  |  |  |
| --- | --- | --- |
| **Version No.** | **Issue Date** | **description** |
|  |  |  |
|  |  |  |
|  |  |  |
|  |  |  |

**Table of Contents**

[1 Purpose and Scope 5](#_Toc181254908)

[2 Objectives 5](#_Toc181254909)

[3 Legal and International Requirements 6](#_Toc181254910)

[3.1 National Laws and Regulations 6](#_Toc181254911)

[3.2 International Standards and Guidelines 6](#_Toc181254912)

[4 Definitions 7](#_Toc181254913)

[5 Abbreviations and Acronyms 8](#_Toc181254914)

[6 Policy Statement 9](#_Toc181254915)

[6.1 Principles of an Effective Internal Grievance Mechanism 9](#_Toc181254916)

[7 Grievance Procedure 10](#_Toc181254917)

[8 Grievance Register 12](#_Toc181254918)

[9 Record Management 13](#_Toc181254919)

[10 Collaboration and Support 13](#_Toc181254920)

[11 Disciplinary Procedure 13](#_Toc181254921)

[12 Roles and Responsibilities 14](#_Toc181254922)

[Annex A: Grievance Reporting Form Template 17](#_Toc181254923)

[Annex B: Internal Grievance Register Template 20](#_Toc181254924)

List of Tables

[Table 13‑1: Key Roles and Responsibilities 14](#_Toc181254925)

|  |
| --- |
| *Instruction Box – Delete when complete.*General Instructions for Customisation and Compliance |
| An Internal Grievance Mechanism should be implemented to provide a process through which the complaints and dissatisfactions of individual employees as well as groups of employees arising out of the employment relationship can be resolved as speedily as possible.An Internal Grievance Mechanism is a crucial component for identifying and addressing corrupt, illegal, or undesirable conduct, including Gender-Based Violence and Harassment (GBVH), and all forms of bullying, harassment, and discrimination. Its purpose is to offer a clear, accessible, and transparent procedure for individuals or groups to raise concerns about improper, irregular, illegal, or corrupt practices, as well as any instances of GBVH, bullying, harassment, or discrimination that are suspected to have occurred, are currently occurring, or may occur in the future.While the grievance mechanism provides a structured approach to addressing complaints, it is not intended to replace direct communication with management. Employees are encouraged to speak directly with their supervisors or other management members when they feel comfortable. The grievance mechanism serves as an additional tool for formal resolution, complementing open communication channels.The grievance mechanism must be tailored to meet the specific needs of the business and be accessible to all employees, including casual, seasonal, and full-time workers. It should include provisions for anonymous reporting to protect confidentiality, especially for sensitive issues like bullying, GBVH, or safeguarding concerns. The company must enforce a strict non-retaliation policy to protect employees who raise grievances from adverse actions.To establish an effective grievance mechanism, the company should define how grievances will be recorded and by whom. Typically, the first point of contact is the employee’s line manager or supervisor, but there should also be an alternative contact outside the immediate management chain, such as an HR department or a designated senior manager if HR is not available. The process should allow for grievances to be submitted in writing (including anonymously if desired) or in person. Provisions should also be made for employees who may need to submit grievances verbally, ensuring accessibility for all workers. The Internal Grievance Mechanism will be communicated to all employees, suppliers, contractors, and visitors, and will also be made available to all interested and affected parties upon request.The grievance mechanism should include the following topics:* Steps for Filing a Grievance:
	+ Method of Submission: Outline how employees can submit a grievance, including available methods such as written submissions, online forms, or verbal reports. Include a reference to the Grievance Reporting Form in Annex A, which should be filled out by the complainant. This form may be customized by each company to suit its specific needs.
	+ Required Information: Specify the information that must be provided when filing a grievance, such as the nature of the complaint, the individuals involved, and any relevant evidence or documentation.
	+ Contact Details: Provide the necessary contact information for submitting grievances, including HR representatives, supervisors, or designated contact persons, along with their phone numbers and email addresses.
* Acknowledgement of Grievance and Investigation Process: Acknowledge the receipt of the grievance and explain how the grievance will be investigated, including who will conduct the investigation and the procedures they will follow. Including the timeframe for each step, from filing the grievance to receiving a response.
* Grievance Register and Record Keeping:
	+ Documentation: All grievances should be recorded in the Grievance Register (attached as Annex B). This register should be maintained by the HR department and include details such as the date of the grievance, the parties involved, and the status of the investigation.
	+ Confidentiality: Ensure that the Grievance Register and all related documentation are kept confidential and secure, with access restricted to authorized personnel only.
	+ Record Retention: Specify how long grievance records will be retained in compliance with legal requirements and company policy.
* Confidentiality: How confidentiality will be maintained throughout the process.
* Resolution and Outcome: How decisions will be communicated and what actions may be taken to resolve the grievance.
* Appeals: The process for appealing a decision if the complainant is not satisfied with the outcome.
* Responsibilities: The roles and responsibilities of those involved in the grievance process, such as HR, managers, and the complainant.
* Monitoring and Review: How the procedure will be monitored for effectiveness and periodically reviewed for updates.
* Training: How the company will ensure that all employees are educated about the grievance procedure, including regular training sessions on how to prevent and report grievances.
* Communication/Dissemination of the Internal Grievance Mechanism: How the Internal Grievance Mechanism will be communicated to all employees and stakeholders, including distribution methods (e.g., employee handbooks, company intranet) and ensuring that all parties are aware of and understand the Internal Grievance Mechanism.
 |

# Purpose and Scope

|  |
| --- |
| *Instruction Box – Delete when complete.** *Insert the company name where indicated throughout the document.*
* *Describe the purpose of the Internal Grievance Mechanism, which is to provide a process for responding to grievances raised by employees or other personnel engaged by the Company.*
* *Insert text indicating the extent of the application of the Internal Grievance Mechanism. For example, “This Internal Grievance Mechanism applies to all employees, to all persons engaged outside employment, to volunteers, to persons engaged in a professional development process, and to all third parties employed by the contractor who are engaged by the Company.”*
* *The section below is generic. Review and modify as required for your company.*
 |

[Insert company name] is dedicated to maintaining a fair, respectful, and safe workplace by implementing a comprehensive grievance procedure and is committed to upholding the highest standards of accountability and transparency across all its operations. This Internal Grievance Mechanism is a crucial component for identifying and addressing corrupt, illegal, or undesirable conduct, including Gender-Based Violence and Harassment (GBVH), and all forms of bullying, harassment, and discrimination. This Internal Grievance Mechanism also includes the company’s policy statement and principles on internal grievances.

Its purpose is to offer a clear, accessible, and transparent procedure for individuals or groups to raise concerns about improper, irregular, illegal, or corrupt practices, as well as any instances of GBVH, bullying, harassment, or discrimination that are suspected to have occurred, are currently occurring, or may occur in the future.

This Internal Grievance Mechanism will be communicated to all [Insert company name] employees, suppliers, contractors and visitors and will be available to all other Interested and Affected Parties upon their request. All employees are encouraged to familiarize themselves with this Internal Grievance Mechanism and utilize the available resources to address any concerns, knowing that their contributions to a positive work environment are valued and protected.

This Internal Grievance Mechanism applies to any grievance, including those deemed confidential.

# Objectives

|  |
| --- |
| *Instruction Box – Delete when complete.** *State the objectives of the Internal Grievance Mechanism and what it aims to achieve.*
* *The section below is generic. Review and modify as required for your company.*
 |

The objectives of the Internal Grievance Mechanism are to:

* To create a means for the employee to communicate with management;
* To ensure that complaints are effectively dealt with by management;
* To prevent disputes from arising in the workplace;
* To render disciplinary proceedings more acceptable where employees also have the means of objecting to management performance; and
* To create awareness of employee problems or problem areas, which management needs to address.

Furthermore, this Internal Grievance Mechanism ensures that all employees have access to a clear and equitable process for reporting and addressing grievances, including those related to GBVH. By fostering a collaborative approach, providing robust support, and enforcing appropriate disciplinary measures, we aim to uphold the highest standards of integrity and respect.

# Legal and International Requirements

## National Laws and Regulations

|  |
| --- |
| *Instruction Box – Delete when complete.** *Review country and local legislation relating to internal grievances and incorporate as may be required into this section.*
* *To find national legislation on internal grievance mechanisms, companies should start by researching the labour laws, occupational health and safety regulations, and corporate governance codes in the countries where they operate. Key sources include government websites, legal databases, and official gazettes, which often publish labour codes or specific laws mandating grievance procedures. Additionally, consulting with local legal experts or HR consultants familiar with national regulations can provide tailored guidance and ensure compliance with local requirements. For multinational operations, it's crucial to harmonize these local laws with any applicable international standards to maintain consistent grievance procedures across all locations, while ensuring country specific requirements are still applied in each respective country.*
 |

The Internal Grievance Mechanism has been developed to conform to the following national laws and regulations:

* *[List all relevant national laws and regulations]*

## International Standards and Guidelines

|  |
| --- |
| *Instruction Box – Delete when complete.** *List all relevant international standards and guidelines and delete any below that are not applicable.*
* *The section below is generic. Review and modify as required for your company. Modify/delete/add to as required.*
 |

The Internal Grievance Mechanism has been developed to conform to the following international standards and guidelines:

* International Finance Corporations (IFC) Performance Standards (PS) on Environmental and Social Sustainability (2012). The most salient PS related to assessing and monitoring health impacts are listed below:
	+ Performance Standard 1 – Social and Environmental Assessment and Management System: Requires companies establish a grievance mechanism for workers and local communities affected by their operations. This is to ensure that grievances are addressed promptly and transparently.
* United Nations Guiding Principles on Business and Human Rights (UNGPs): The UNGPs are a set of guidelines for states and companies to prevent, address, and remedy human rights abuses committed in business operations. Principle 29 specifically encourages companies to establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted by business activities.
* Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises: The OECD Guidelines provide recommendations for responsible business conduct. They highlight the importance of establishing internal mechanisms for handling grievances and ensuring that these mechanisms are legitimate, accessible, predictable, equitable, and transparent.
* ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy: This ILO declaration encourages multinational enterprises to provide channels for grievance handling and dispute resolution, particularly in the context of labour rights and working conditions.

# Definitions

|  |
| --- |
| *Instruction Box – Delete when complete.** *The table below includes a list of definitions of terms used in the document. Modify/delete/add to as required.*
 |

| **Term/Acronym** | **Definition** |
| --- | --- |
| Bullying | Repeated and persistent negative behaviour directed at an individual or group, intended to intimidate, degrade, or humiliate them. This behaviour can be verbal, physical, or psychological and creates a hostile work environment. |
| Complainant | Any person who reports an incident, including a gender-based violence incident. |
| Discrimination | Unfair or unequal treatment of individuals based on characteristics such as race, gender, age, disability, religion, or other protected attributes. Discrimination involves making decisions or taking actions that disadvantage individuals because of these characteristics. |
| Gender-Based Violence and Harassment | Any act or conduct based on sex, gender identity, or gender expression that impairs or interferes with the dignity, physical integrity, psychological well-being, or personal safety of an individual, including sexual harassment, bullying, intimidation, or discrimination. |
| Harassment | Refers to any unwelcome or offensive conduct towards an individual or group that violates their dignity, creates an intimidating, hostile, degrading, humiliating, or offensive environment, or interferes with their work performance. Harassment can manifest in various forms, including verbal, non-verbal, physical, or electronic/cyber/social media behaviours. It often targets personal characteristics such as race, ethnicity, religion, gender, sexual orientation, disability, or any other protected characteristic under applicable laws or organizational policies. Examples of harassment include but are not limited to:* Verbal harassment: Offensive jokes, slurs, epithets, or comments.
* Non-verbal harassment: Displaying offensive materials or gestures.
* Physical harassment: Unwanted physical contact or assault.
* Cyber harassment: Harassment through emails, social media, or other electronic communications.

Harassment can occur between peers, supervisors, clients, or any individual in a position of power over another within the workplace or related environments. It is illegal in many jurisdictions and against organisational policies due to its detrimental effects on individuals and workplace culture. |
| Improper Behaviour | Actions or conduct that do not align with ethical standards or company policies, even if they are not illegal. This includes actions that undermine the integrity or professionalism expected in the workplace. |
| Irregular Behaviour | Conduct that deviate from established procedures or norms, potentially disrupting the normal functioning or operations of the organization. |
| Illegal Behaviour | Actions that violate laws or regulations, including criminal acts such as theft, fraud, or any activity prohibited by law. |
| Corrupt Behaviour | Actions involving the abuse of power or authority for personal gain, such as bribery, kickbacks, or other forms of unethical financial dealings. |
| Respondent | Any person who is accused of committing an offence including a gender-based violence incident. |

# Abbreviations and Acronyms

|  |
| --- |
| *Instruction Box – – Delete when complete.** *The table below includes a list of abbreviations and acronyms which are referred to in the document. Modify/delete/add to as required.*
 |

| **Abbreviations and Acronyms** | **Definition** |
| --- | --- |
| GBVH | Gender-based violence or harassment |
| HR | Human Resources |
| IFC | International Finance Corporation |
| ILO | International Labour Organization |
| OECD | Organisation for Economic Co-operation and Development |
| UNGP | United Nations Guiding Principles on Business and Human Rights |

# Policy Statement

|  |
| --- |
| *Instruction Box – Delete when complete.** *Provide key principles or standards your company aims to uphold.*
* *The section below is generic. Review and modify as required for your company.*
 |

[Insert company name] is committed to providing a safe, respectful, and inclusive workplace environment for all employees. We do not tolerate any form of GBVH, including but not limited to sexual harassment, bullying, intimidation, or discrimination. This Internal Grievance Mechanism outlines our commitment to preventing GBVH, addressing reported incidents promptly and confidentially, and supporting victims through effective grievance procedures.

[Insert company name] strictly prohibits any form of retaliation against individuals who report any incidents including GBVH cases or to any persons who participate in investigations. Retaliation includes but is not limited to dismissal, demotion, harassment, or any other adverse action taken against an employee because of their involvement in a grievance process. Any instance of retaliation will be treated as a serious violation of this Internal Grievance Mechanism and will be subject to disciplinary action.

## Principles of an Effective Internal Grievance Mechanism

|  |
| --- |
| *Procedure Guidance – Delete when complete.** *Provide a list of principles which is to serve as a guiding framework for how grievances are dealt with, providing direction on how they should be handled.*
* *Some examples of commitment to the principles have been included below. Review and modify as required for your company.*
 |

[Insert company name] bases its actions on the following principles:

* **Prevention**: [Insert company name] promotes a culture of respect and zero tolerance for GBVH through awareness programs, training, and clear communication of policies.
* **Reporting**: Employees are encouraged to report incidents of GBVH promptly and confidentially. Reports can be made to any supervisor, HR representative, or designated contact person.
* **Investigation**: All reports of GBVH will be promptly and impartially investigated. Investigations will respect the confidentiality and rights of all parties involved.
* **Resolution**: If an incident of GBVH is substantiated, appropriate disciplinary action will be taken against the perpetrator in line with company policies and local laws.
* **Support**: [Insert company name] is committed to providing support to victims of GBVH, including access to counselling services, medical assistance, and legal support where necessary.
* **Training**: All HR personnel and management involved in handling grievances will be trained on the process, sensitivity of cases, and maintaining confidentiality.

# Grievance Procedure

|  |
| --- |
| *Instruction Box – Delete when complete.** *Describe the steps for filing a grievance. This should cover all aspects of the grievance process, from filing to resolution. Companies often provide specialised reporting channels for GBVH incidents, such as dedicated hotlines or confidential email addresses, to ensure that the report is handled sensitively and discreetly.*
* *Insert the company name, contact numbers and email addresses where indicated.*
* *The section below is generic. Some steps in the procedure have been included below. Review and modify as required for your company.*
 |

The following steps shall be followed when reporting a grievance internally:

* **Reporting**: Employees can report incidents of Gender-Based Violence and Harassment (GBVH), bullying, harassment, or discrimination either anonymously or by identifying themselves to a supervisor, HR representative, or designated contact person. Reports can be made verbally, in writing, or through [Insert company name]'s official reporting channels, including the following:
	+ Phone: [Insert phone number]
	+ Email: [Insert email address]
	+ Online: [Insert link to online reporting form]

Additionally, employees can use the **Grievance Reporting Form** attached as **Annex A** to this Internal Grievance Mechanism to document and formally submit their grievances. This form is available through the HR department and on the company intranet. Grievances should ideally be reported within 90 days of an incident to ensure timely investigation and resolution however grievances beyond this timeframe will still be considered and investigated as far as possible.

* **Acknowledgment**: After a grievance is reported, [Insert company name] will acknowledge receipt of the grievance within 2 business days. If the grievance is submitted using the **Grievance Reporting Form** (**Annex A**), a confirmation of receipt will also be provided in writing. For GBVH reports, the acknowledgment will include information on available support resources for the complainant.
* **Grievance Register and Record Keeping:** All reported grievances, including anonymous grievances, will be recorded in the **Grievance Register**, which is attached as **Annex B** to this Internal Grievance Mechanism. The register will be a confidential document maintained by the HR department and will include details such as the date of the report, the nature of the grievance, the parties involved, and the status of the investigation. In the case of anonymous grievances, identifying details of the complainant will not be recorded. For GBVH cases, additional care will be taken to ensure that details are recorded with heightened sensitivity to the complainant’s privacy. The HR department will be responsible for ensuring that the Grievance Register is kept up-to-date and that all entries are accurate and complete. Management will review the Grievance Register [insert period e.g. monthly, quarterly] to identify any patterns or recurring issues and to ensure that all grievances are being handled in a timely and effective manner. Records of grievances and their resolutions will be retained for a minimum of [Insert retention period] years in compliance with legal requirements and company policy.
* **Anonymous Reporting:** Anonymous reports can be submitted through [insert reporting channels, e.g. an anonymous hotline, suggestion box, or secure online form]. The company will treat anonymous grievances with the same level of seriousness and care as any other grievance reported. However, the ability to thoroughly investigate may be limited, especially if additional information is required and the complainant cannot be contacted. For GBVH cases, the company will strive to ensure that anonymous reporting mechanisms are accessible and well-publicised to encourage reporting without fear of retribution or retaliation.
* **Investigation**: Thereafter the company will promptly initiate a thorough and impartial investigation, ensuring that the privacy and rights of all parties involved are respected. For anonymous grievances, the investigation will proceed based on the information provided, though the absence of direct communication with the complainant may limit the scope of the inquiry. The investigation will be conducted by a qualified individual or team, independent of the parties involved, to ensure fairness. In GBVH cases investigators will have specific training in handling sensitive issues related to GBVH to ensure a supportive and understanding approach.
* **Feeback Loop**: A formal response or update will be provided to the complainant within 10 business days from the date of grievance submission. If additional time is required for the investigation, the complainant will be informed of the delay and the anticipated completion date. For anonymous grievances, feedback may be provided through the anonymous reporting channel where possible (e.g. using a third party/external provider) though direct communication may not be feasible. For GBVH grievances, the company may offer additional resources or follow-up support to the complainant, depending on the nature of the case.
* **Resolution**: If the investigation substantiates the report, [Insert company name] will take appropriate corrective and disciplinary actions against the perpetrator, in line with company policies and legal requirements. Where relevant, company policies will be updated. The complainant will be informed of the outcome, including any actions taken, within a reasonable timeframe. In cases of anonymous grievances, the resolution will still be recorded, and action will be taken as required, though feedback to the anonymous complainant may not be possible. In GBVH cases, the resolution process may include a review of safety measures and ensuring the complainant’s protection in the workplace.
* **Appeals**: Both the complainant and the respondent have the right to appeal the decision if they believe the outcome was unjust or the process was flawed. Appeals must be submitted in writing, explaining the reasons for the appeal. The company will review the appeal and follow a fair process to reassess the case. If no formal appeals procedure exists, the company will appoint a senior manager or independent reviewer to handle the appeal and ensure impartiality. For GBVH cases, the appeal process may be expedited to ensure timely resolution and support for the complainant.
* **Confidentiality**: All reports and proceedings related to GBVH will be handled with strict confidentiality, ensuring that information is shared only on a need-to-know basis and in accordance with legal obligations. All employees involved in the investigation will be reminded of the importance of confidentiality, particularly in GBVH cases, to protect the individuals concerned.
* **Training and Awareness**: [Insert company name] is committed to preventing GBVH and will provide regular training and awareness programs for all employees. These programs will cover the nature of GBVH, the company's grievance procedure, and the rights and responsibilities of all employees under this Internal Grievance Mechanism. Specific training related to GBVH will be mandatory for all staff, particularly those in supervisory or HR roles.
* **Communication and Dissemination**: [Insert company name] will actively communicate and disseminate this Internal Grievance Mechanism to all employees and stakeholders. This will include incorporating the Internal Grievance Mechanism into employee handbooks, sharing it through the company intranet, and conducting informational sessions to ensure that everyone is aware of the reporting mechanisms, procedures, and their rights and responsibilities under the Internal Grievance Mechanism. Regular reminders and updates will also be provided to reinforce understanding and compliance. Information on GBVH will be highlighted in appropriate communications to ensure visibility and accessibility for employees

# Grievance Register

|  |
| --- |
| *Instruction Box – Delete when complete.** *List the type of information required to complete a grievance register.*
* *Specify the time period for reporting a grievance, for example, you might want to add the following, “A grievance should be registered within 90 days from the date on which the employee became aware of the act, however grievances beyond this timeframe will still be considered and investigated as far as possible”.*
* *Below is some example text. Review and modify as required for your company.*
 |

The following information must be included/ entered in the Grievance Register:

* Date the grievance is/was received;
* Name and contact information of the complainant (if non-anonymous);
* Description of the grievance;
* Date the acknowledgement was sent;
* Department responsible for managing the grievance;
* Measures taken to resolve the grievance, including details of the resolution discussed and agreed with the complainant(s);
* Outcome of the actions implemented; and
* Status of the grievance (open, resolved, unresolved, escalated or abandoned).

# Record Management

|  |
| --- |
| *Instruction Box – Delete when complete.** *Describe the process for documenting all results, findings and measures taken from the time when the grievance was filled through to the time when a resolution was achieved.*
* *Below is some example text. Review and modify as required for your company.*
 |

The company will retain a copy of the original grievance correspondence. During each step of the process, a record of the progress will be minuted, and a copy will be either sent to or issued by the HR Department. Relevant information from these records will be entered into the **Grievance Register** (**Annex B**), which will be maintained by the HR Department to ensure a detailed and accurate account of all grievances and the actions taken.

Upon closure of the matter, the original grievance along with the accompanying minutes, and any related documentation from the Grievance Register, will be filed in the employee’s personnel file. This will serve as a comprehensive record of the steps taken and the final resolution of the grievance, ensuring transparency and accountability in the handling of workplace concerns.

# Collaboration and Support

|  |
| --- |
| *Instruction Box – Delete when complete.** *Describe the level / type of support (e.g. from co-workers, and/or union representatives) the complainant is entitled to throughout the grievance process.*
* *The section below is generic. Review and modify as required for your company.*
 |

The company, the complainant, and, if applicable, the relevant labour union, will collaborate to reach a resolution that is acceptable to all parties involved. Employees have the right to be accompanied by a co-worker, line manager, or union representative during any meetings related to grievances to ensure fair and supportive discussions.

Records of all meetings and discussions regarding grievances will be provided to the involved employees. If a grievance impacts a group of employees, they may appoint a delegation of up to three representatives, including trade union representatives where applicable, to address the grievance collectively.

# Disciplinary Procedure

|  |
| --- |
| *Instruction Box – Delete when complete.** *Describe the consequences that may arise after a grievance is resolved and misconduct is confirmed, as well as the consequences for misuse of the grievance mechanism. This should align with the company’s broader disciplinary policy, detailing potential outcomes of the grievance process that could involve disciplinary actions. It is kept separate from the procedure as it pertains to actions that occur after the grievance procedure has been concluded. It covers the enforcement of company policies rather than the grievance-handling process itself.*
* *The section below is generic. Review and modify as required for your company.*
 |

If a company investigation finds any employee guilty of workplace harassment, bullying, or any form of misconduct, the company will address this in line with its Disciplinary Procedure. This may include disciplinary actions up to and including termination of employment, depending on the severity of the misconduct.

Additionally, if an investigation determines that an employee has knowingly made a false claim or maliciously accused another employee of misconduct, appropriate disciplinary action will be taken against the individual who made the false claim. The company is committed to ensuring that the grievance mechanism is used responsibly and that it serves its intended purpose of fostering a safe and respectful workplace.

# Roles and Responsibilities

|  |
| --- |
| *Instruction Box – Delete when complete.** *Provide the names and positions of the personnel that are responsible for different aspects of the Internal Grievance Mechanism.*
* *The section below is generic. Review and modify as required for your company.*
 |

The key roles and responsibilities for the implementation of this Internal Grievance Mechanism are described in **Table 13‑1** *[modify as required].*

**Table 13‑1: Key Roles and Responsibilities**

| **Role** | **Responsibility** |
| --- | --- |
| **All Employees**  | * Understand the company’s policy and principles on internal grievances and the Internal Grievance Mechanism.
* Participate in training and awareness programs related to the grievance mechanism.
* Report any issues or grievances in accordance with the established process.
* Support colleagues who may be going through the grievance process, while maintaining confidentiality and respect.
 |
| **Employee (raising the grievance)** | * Report grievances to the designated contact person, such as a supervisor, HR representative, or through anonymous channels.
* Provide accurate and honest information during the grievance process.
* Engage in the grievance process, including attending meetings if required.
 |
| **Employee Support / Union Representative** | * Accompany the employee to any meetings or discussions related to the grievance.
* Offer emotional support and guidance during the process.
* Ensure that the employee’s concerns are fully communicated and understood by the company representatives.
 |
| **Line Manager** | * Listen to the employee's grievance and document it accurately.
* Attempt to resolve minor issues directly, if possible and appropriate.
* Forward more serious grievances to the HR department or designated authority.
* Ensure confidentiality and non-retaliation towards the complainant.
 |
| **HR Representative** | * Receive and document grievances from employees.
* Conduct or coordinate investigations into the reported grievance.
* Maintain records of all grievances, investigations, and outcomes.
* Communicate the findings and resolutions to the complainant and any other relevant parties.
* Ensure that all processes are carried out impartially and in line with company policy.
 |
| **Senior Manager** | * Review grievances that involve more serious or complex issues.
* Provide support to the HR department during investigations or decision-making processes.
* Handle appeals from employees who are dissatisfied with the outcome of their grievance.
* Ensure that the grievance mechanism is effectively implemented and adhered to.
 |
| **Ethics and Compliance Officer** | * Handle grievances that involve potential ethical breaches, corruption, or serious misconduct.
* Provide an alternative point of contact for employees who may not wish to report grievances to their immediate supervisor or HR.
* Ensure confidentiality and impartiality throughout the grievance process.
* Monitor the grievance process for fairness and compliance with legal requirements.
* Handle appeals and ensure that the process is transparent and thorough.
 |
| **Grievance Monitoring Committee (if applicable)** | * Review and monitor the effectiveness of the grievance mechanism regularly.
* Recommend improvements or updates to the Internal Grievance Mechanism.
* Ensure that all grievances are handled consistently and fairly across the organization.
 |
| **Legal Council** | * Advise the company on legal obligations and risks related to the grievance.
* Ensure that the grievance process complies with all relevant laws and regulations.
* Assist in the resolution of grievances that may have legal consequences for the company.
 |
| **Training and Development Officer** | * Develop and deliver training programs on the grievance mechanism, GBVH, bullying, harassment, and discrimination.
* Ensure that all employees understand their rights and responsibilities under the grievance policy.
* Provide ongoing awareness and refresher training to keep the Internal Grievance Mechanism top of mind for employees.
 |

# Annex A: Grievance Reporting Form Template

The Grievance Reporting Form serves as a standardized document for employees to record and submit their grievances. It is attached as an annex to this Internal Grievance Mechanism and is also available through the HR department and on the company intranet.

**[Insert Company Name] Grievance Form**

| Grievance Reference Number: | *[For Office Use Only]* |
| --- | --- |
|  Date of Submission: DD/MM/YYYY] |

 Employee Details

| Name: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| --- | --- |
| Employee ID: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Department: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Position/Job Title: |  |
| Phone Number: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Email Address: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

 Details of Grievance

| Type of Grievance: *(Check all that apply)* |  |
| --- | --- |
| ☐ Harassment (including GBVH) | ☐ Bullying |
| ☐ Discrimination | ☐ Improper, Irregular, Illegal, or Corrupt Behaviour |
| ☐ Unfair Treatment | ☐ Working Conditions |
| ☐ Safety Concerns | ☐ Contractual Issues |
| ☐ Other (please specify): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

| Date(s) of Incident(s): | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| --- | --- |
| Location of Incident(s): | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  |  |

| Description of the Incident(s): | *(Provide a detailed account of the grievance, including any relevant dates, times, people involved, and the nature of the incident. Attach additional sheets if necessary.)* |
| --- | --- |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

| Witnesses (if any): | *(Please provide the names and contact details of any witnesses who can support your grievance.)* |
| --- | --- |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Actions Taken

| Have you raised this grievance with your supervisor/line manager? | ☐ Yes ☐ No |
| --- | --- |
| If yes, what was the outcome? | *(Provide details of any discussions or actions taken so far.)* |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Desired Outcome

| Please state what outcome or resolution you are seeking: | *(Be specific about what you would like to happen to resolve this grievance.)* |
| --- | --- |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Confidentiality and Anonymity

| Would you like this grievance to be treated anonymously? | ☐ Yes ☐ No |
| --- | --- |
| Do you consent to your details being shared with those investigating this grievance? | ☐ Yes ☐ No |

 Signature

| Employee Signature: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| --- | --- |
| Date: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

***For HR/Management Use Only***

| Date Grievance Received: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| --- | --- |
| Acknowledgment Sent on: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Investigating Officer Assigned: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Investigation Start Date: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Investigation Completion Date: | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

| Outcome/Resolution: | *(Include details of the investigation outcome and any actions taken.)* |
| --- | --- |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

| Follow-Up Actions: | *(If applicable)* |
| --- | --- |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |
|  | \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ |

Final Review Completed on: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Reviewed by: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Signature:| \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

# Annex B: Internal Grievance Register Template

The Internal Grievance Register is an MS Excel document, which is a *confidential document* used to record all reported grievances.

It is maintained by the HR department and is attached as an annex to this Internal Grievance Mechanism.