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## GRIEVANCE POLICY

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### 1.0 Introduction

Blue Hackle Limited is committed to promoting effective working relationships and an environment in which our internal and external stakeholders feel able to raise issues within the organization.

A grievance is a complaint against Blue Hackle Limited regarding improper and/or illegal conduct, including such acts or omissions that would violate the principles contained in the International Code of Conduct Association (ICoCA). Furthermore, this procedure will facilitate the reporting of potential and actual non-conformances of the clauses contained in ISO 18788, or violations of international, national and local laws or human rights.

This grievance procedure provides a clear and transparent framework to deal with concerns, problems or complaints raised by our internal and external stakeholders in the course of their engagement with Blue Hackle Limited.

Our aim is to minimize obstacles to access this procedure and therefore, it has been documented in a universal language and made available publicly through the Blue Hackle Limited website.

This procedure ensures that our internal and external stakeholders can approach the organization with their grievance, knowing that we will offer full confidentiality, privacy, whilst minimizing the risk of retaliation on those who come forward with a grievance. Furthermore, The aim of this procedure is, as far as possible, to achieve a fair and prompt resolution grievances.

The procedure applies to all internal and external stakeholders, including employees employed by the Blue Hackle Limited under a contract of employment or working as a consultant.

### 2.0 General Principles

The following principles will apply to the application of this procedure:

1. Wherever possible grievances should be resolved informally without recourse to formal procedures. It is expected that individuals will enter into the procedure in good faith, with the aim of resolving a particular issue. The grievance procedure should not be used as a substitute for normal day to day discussions.
2. It is recognised that there may be occasions when it is not possible for a grievance to be resolved informally. In such cases the procedure below at Stage 1 should be followed.

3. All parties should be absolutely clear whether any meeting is being held under the informal or formal stage of the procedure.
4. Any steps taken under this procedure should be taken promptly, unless there is a good reason for delay.
5. At any stage in the procedure, subject to the agreement of all parties concerned, there may be a suspension in proceedings to facilitate mediation (see 3 below), fact-finding or other non-adversarial discussions with the aim of promoting resolution of the case.
6. **Right to be accompanied** - All employees who are the subject of this procedure will have the right to be accompanied at any formal meetings by a representative or work colleague.
7. **Confidentiality** - All parties involved in these procedures must ensure that they maintain, as appropriate, the confidentiality of the process within and outside Blue Hackle Limited.
8. **Protection** - Blue Hackle Limited will not tolerate any form of intimidation of witnesses or the prevention of evidence being gathered and will work diligently to protect individuals submitting a complaint or grievance in good faith from retaliation.
9. **Disciplinary action** – Blue Hackle Limited will take the necessary disciplinary actions following the outcome of a grievance and such measures will be communicated to the individual reporting the grievance, as well as the individual(s) found to be in violation.
10. **Timescales** - Whilst every endeavor will be made to comply with timescales, due to the complexity and or specific circumstances of a case, timescales may be extended. In such circumstances the individuals concerned will be advised of the reasons for any delay.

In very exceptional circumstances where the individual is reluctant to pursue a formal complaint through the Grievance Procedure, but where the alleged harassment is deemed very serious in nature or where the organisation is aware there are broader issues of concern around the culture of a team / group of individuals, an investigation may anyway be instigated.

Blue Hackle Limited will deal with all grievances alleging criminal acts, violations of human rights or imminent danger to individuals immediately.

### **3.0 Informal Procedure**

1. Grievances can often be resolved quickly and informally through discussion with a senior management representative of the organisation and there is an expectation that every effort will be made to resolve matters informally. The aggrieved are therefore expected to raise any concerns or issues informally with a senior management representative.

2. Senior management representatives will discuss an individual's concerns in confidence with him/her, make discreet investigations, as appropriate, and attempt to address his/her concerns fairly and promptly.
3. It is the Senior management representative's responsibility to seek to resolve the grievance informally and to notify the individual of the outcome.
4. It is expected that an individual will seek to resolve his/her grievance informally in the first instance and will only progress to a formal grievance if the issue cannot be resolved by informal means. Where this has been unsuccessful, or circumstances make this route inappropriate, the matter should be raised formally through the grievance procedure.

If the grievance is against an employee's manager, it should be raised with that person's manager who will seek to resolve the matter informally as appropriate.

#### **4.0 Formal Procedure**

##### **4.1 Stage One - Formal Resolution**

1. If it is not possible to resolve a grievance informally, the individual should raise the matter formally, and without unreasonable delay, by putting his/her grievance in writing using the Grievance record sheet (Appendix A) submitted to [ethics@bluehackleint.com](mailto:ethics@bluehackleint.com).
2. The organisation will acknowledge receipt of the grievance, either verbally or in writing, normally within five working days.
3. The organisation will invite the individual to attend a formal grievance meeting in order to discuss the grievance. This meeting will normally take place within ten working days of the acknowledgement.
4. As a result of the initial grievance meeting, the organisation may determine that it is necessary to make further enquiries and/or may appoint an investigating officer to conduct an impartial and thorough investigation into the background facts of the grievance made by the individual.

##### **4.2 Investigation**

1. If an investigation is deemed appropriate, the organisation will appoint an investigating officer. Where the grievance relates to other employees, the individuals involved will be informed and will be given the opportunity to submit a response.
2. The results of the investigation will be provided to the organisation in the form of a written statement. This statement will also be made available to the individual raising the grievance and any party named in the grievance. Following the investigation, the organisation may deem it appropriate to hold a further grievance meeting with the individual raising the grievance. The

purpose of this meeting is to seek clarification on any further issues that might have arisen and to allow the individual to comment on the findings of the investigation.

3. In some cases it might be appropriate to hold a grievance hearing with the aggrieved individual and the person(s) against whom the grievance lies.

#### **4.3 Outcome**

1. The Senior management team at Blue Hackle Limited will determine the outcome of the grievance. They may reject the grievance, or may uphold the complaint and indicate what steps have been/should be taken to resolve it.
2. The organisation will inform the individual, in writing, of the decision and the right of appeal normally within ten working days of receiving the investigation statement or of the final grievance meeting/hearing. The individual will be given an explanation if this is not possible and will be advised when a response can be expected.
3. Any individual(s) named in the grievance will also be advised, in writing, of the decision.

#### **4.4 Stage Two – Appeal**

1. If an individual remains aggrieved, s/he may write to the organisation within ten working days of the date of the decision under Stage 1, exercising his/her right of appeal.
2. Appeals will be considered by a nominated Appeal Officer. The Appeal Officer will have had no prior involvement in the case.
3. Where the appeal involves other individuals, the person(s) named in the grievance will be informed of the appeal and the outcome.
4. The decision may be given verbally at the appeal meeting and will in any event be conveyed or confirmed in writing within ten working days of the hearing. Any recommendations for further action will be clearly stated in the letter.
5. The decision following the appeal is final and there will be no further internal right of appeal.

(Appendix A)



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## **GRIEVANCE RECORD**

This document is produced by Blue Hackle Limited to record grievances by any of the company's internal or external stakeholders. Corrective action should be taken to rectify all valid grievances.

<b>NAME:</b>		<b>PROJECT:</b>		
<b>POSITION:</b>		<b>DATE:</b>		<b>TIME OF GRIEVANCE</b>
<b>LOCATION OF GRIEVANCE</b>				
<b>CIRCUMSTANCES</b>				
<b>REASON FOR GRIEVANCE</b>				

<b>To be dealt with Formally or Informally?</b>	
<b>Corrective action Taken?</b>	
<b>Comment by the aggrieved person</b>	

**Person reporting Grievance:**

<b>SIGNATURE</b>	<b>NAME</b>	<b>POSITION</b>	<b>DATE</b>

**Senior Management Representative:**

<b>SIGNATURE</b>	<b>NAME</b>	<b>POSITION</b>	<b>DATE</b>

**(This notice is to be submitted to [ethics@bluehackleint.com](mailto:ethics@bluehackleint.com) for processing)**