

Securatex Ltd — Grievance Policy

1. Document control

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Related documents (controlled):

- IMS-POL-WB-001 Whistleblowing (Speak Up) Policy
 - IMS-POL-EDI-001 Equality, Diversity & Inclusion Policy
 - IMS-POL-COC-001 Code of Conduct
 - IMS-PRO-NCR-001 Nonconformity & Corrective Action Procedure
 - IMS-PRO-INV-001 Investigation Procedure (internal)
 - IMS-PRO-HR-REC-001 HR Records & Retention Standard (internal)
- Distribution: All employees/workers; managers/supervisors; HR function (where present)

2. Policy statement

Securatex Ltd is committed to treating all workers fairly, respectfully and consistently. We recognise that concerns and workplace issues may arise and we encourage early, constructive resolution wherever possible.

This policy sets out a fair and transparent process for raising and resolving grievances. We will:

- handle grievances promptly and impartially;
- maintain confidentiality as far as reasonably practicable;
- ensure individuals raising grievances are not subjected to detriment or retaliation;
- document decisions and actions appropriately; and
- use lessons learned to improve working practices and prevent recurrence.

3. Scope

This policy applies to:

- employees (permanent, fixed-term, part-time);
- contractors and agency workers where Securatex Ltd is the engaging party (process adapted as appropriate);
- any person working under Securatex Ltd direction (where reasonably applicable).

A grievance is a concern, problem or complaint raised by a worker about:

- working relationships, behaviour, bullying/harassment;
- workload, working conditions, supervision;
- working arrangements (hours, duties, treatment at work);

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- perceived unfairness (other than formal disciplinary outcomes, which have separate appeal routes);
- concerns about policies being applied inconsistently.

Exclusions / related routes

- Whistleblowing: matters in the public interest (wrongdoing, illegality, serious risk, concealment) should be raised via the Whistleblowing Policy.
- Client complaints: are handled through the Client Complaints Policy.
- Safeguarding or immediate risk: urgent risk to safety/security must be escalated immediately to operational management and managed under incident processes.

If a grievance contains both personal matters and whistleblowing elements, the Company will manage the issues via the most appropriate route(s), and may split the matter accordingly.

4. Principles

1. Early resolution: informal resolution is encouraged where appropriate and safe.
2. Fairness: concerns will be handled objectively and consistently.
3. No detriment: raising a genuine grievance will not result in retaliation.
4. Confidentiality: information will be shared on a need-to-know basis.
5. Right to be accompanied: employees may be accompanied at formal grievance meetings by a workplace colleague or accredited trade union representative.
6. Evidence-based decisions: outcomes will be based on reasonable investigation and documented findings.
7. Timeliness: defined timeframes will be applied and communicated.

5. Responsibilities

Managing Director (MD)

- overall accountability for grievance governance;
- ensures impartiality and adequate resources;
- hears appeals where practicable and not previously involved.

Line Manager / Supervisor

- encourages early resolution;
- receives informal concerns;
- escalates promptly to formal process when needed;
- supports evidence collection and maintains confidentiality.

Grievance Officer (GO)

(If not appointed, the MD will assign a suitable manager to act as GO for each case.)

- acknowledges and logs grievances;
- conducts triage and appoints an Investigating Officer where required;
- arranges meetings, documents outcomes and timeframes.

Investigating Officer (IO)

- investigates impartially, gathers evidence, interviews parties;
- produces findings and recommendations.

Employee raising the grievance

- raises concerns promptly and provides relevant information;
- participates in meetings and cooperates with the process;
- maintains confidentiality.

6. Informal resolution (Stage 0)

Where appropriate, the worker should raise the issue with their line manager as early as possible to resolve informally. Informal action may include:

- facilitated discussion;
- clarification of expectations;
- mediation (where appropriate and agreed);
- adjustments to working practices or communication arrangements.

Target timeframe: aim to resolve informally within 10 working days.

Informal resolution is not appropriate where:

- there are allegations of serious misconduct, discrimination, harassment, bullying, or safeguarding concerns;
- there is a significant power imbalance or fear of retaliation;
- the worker requests formal handling.

7. Formal grievance process

7.1 Submitting a formal grievance (Stage 1)

A formal grievance should be submitted in writing to:

- Email: hr@securatex.co.uk or governance@securatex.co.uk (or the address you choose)
- Or in writing: Grievance Officer, Securatex Ltd, [Registered Office Address]

The grievance should include:

- what happened (dates/times/locations where possible);
- who was involved;
- any relevant evidence (messages, emails, witness names);
- what outcome or remedy is sought.

7.2 Acknowledgement and triage

The GO will acknowledge receipt within 2 working days and confirm:

- reference number;
- next steps and indicative timescales;

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- whether the matter will be handled under grievance, whistleblowing, or another route.

7.3 Investigation (where required)

A proportionate investigation will be carried out. This may include:

- interviews with relevant parties and witnesses;
- review of records (rotas, emails, logs, supervision notes);
- review of policies and contractual expectations.

Target timeframe: investigation completed within 10 working days of acknowledgement for standard cases, or 20 working days for complex cases. If longer is required, the employee will be updated at least every 5 working days.

7.4 Formal grievance meeting

A meeting will be arranged to discuss the grievance, normally after initial investigation steps. The employee may be accompanied by a workplace colleague or trade union representative.

The meeting will:

- clarify the grievance and desired outcome;
- allow the employee to present their case;
- review relevant findings;
- confirm any further investigation required.

7.5 Outcome decision

A written outcome will be issued within 5 working days of the meeting (or completion of investigation), including:

- summary of the grievance;
- findings (upheld / partially upheld / not upheld);
- actions to be taken (and by whom, with timescales);
- any support measures (e.g., mediation, management intervention);
- appeal rights and how to appeal.

Actions may include:

- changes to working arrangements or reporting lines (where feasible);
- training, coaching, or supervision improvements;
- mediation;
- policy clarification or updates;
- disciplinary route where misconduct is indicated (handled separately).

8. Appeals (Stage 2)

If the employee is dissatisfied with the outcome, they may appeal in writing within 10 working days of receiving the outcome.

The appeal should state:

- the grounds for appeal (e.g., new evidence, procedural concerns, unreasonable outcome);
- the remedy sought.

An appeal meeting will be arranged within 10 working days where practicable. The appeal will be heard by a manager not previously involved, wherever reasonably possible.

A final appeal decision will be issued in writing within 5 working days of the appeal meeting (or completion of any additional investigation).

9. Confidentiality and data protection

All grievances will be handled confidentially, with information shared only on a need-to-know basis. Records will be stored securely and processed lawfully in line with UK GDPR/DPA 2018 principles.

Where allegations involve personal data about others, disclosure will be minimised and lawful. Some information may be withheld where disclosure would breach privacy rights or compromise safety/security.

10. Protection from detriment (non-retaliation)

Securatex Ltd will not tolerate retaliation against anyone who raises a grievance in good faith. Any concerns about retaliation should be reported immediately to the GO/MD and will be treated as urgent.

Retaliation may result in disciplinary or contractual action.

11. Vexatious or malicious grievances

If a grievance is found to be malicious or knowingly false, Securatex Ltd may consider disciplinary action. This does not apply where a grievance is raised honestly but not upheld.

12. Records and retention

A Grievance Register will be maintained, recording:

- reference number; date received; category; parties involved;
- key actions and dates; meeting notes; outcome; appeal status;
- corrective actions raised (where relevant) and effectiveness checks.

Retention: grievance records will be retained for 6 years from closure (or longer where legal hold/contractual requirements apply).

Records are controlled and protected against unauthorised access, alteration, or loss.

13. Continual improvement and management review

Trends and systemic issues identified from grievances will be reviewed as part of management review and continual improvement, including:

- recurring themes (e.g., supervision, workload, behaviours);
- time to acknowledge/close;
- corrective actions and effectiveness;
- training and competence needs.

This supports a healthy organisational culture and contributes to continual improvement across the IMS.

14. Review

This policy will be reviewed annually and updated where required due to:

- audit findings;
- significant cases or recurring themes;
- changes in law, client requirements, or organisational structure.

