



**G4S Risk Management Group
Complaints Policy and Procedure**



G4S Risk Management Complaints Policy and Procedure

Preface and Document Control

This document is intended to provide information in respect of G4S Policy, Procedure, Standards or Guidance and will be periodically updated to reflect any changes due to the business requirement or infrastructure. Neither all or part of this document shall be reproduced or released for commercial purposes by a recipient without the express consent of the stated G4S document Owner. This document must be reviewed and approved by the designated G4S approver(s) to ensure technical accuracy and business validity.

Document Owner and Approver(s)

Owner	Chief Operating Officer, G4S Risk Management
Approver(s)	Managing Director, G4S Risk Management

Version Control

Version	Version Date	Document history
V1	Mar 2019	Initial Issue
V2	Jan 2020	Updated Document Approver, transferred to Google Docs format, replaced Director, Secure Services with G4S Risk Management Managing Director, Removed reference to G4S Whistleblowing Policy, Adding a brief clarification on grievance impact categories, Adding hyperlinks to relevant documents, Minor general formatting edits
V3	Jul 2020	Replaced role title 'Business Operations and Compliance Manager' with "Chief Operations Officer" throughout the document to reflect organisational changes. Removed reference to internal distribution via RMG Trello Boards, updated reference to company organisation.
V4	May 2021	Changed document title from "Non-Judicial External Grievance Policy" as "Complaints Policy and Procedure", simplified content, included POC details, added external distribution channel details.

Internal Distribution

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1. Document Control

1.1. Purpose

G4S Risk Management aims to provide an efficient and professional service to our clients, partners, contractors and suppliers whilst ensuring our business processes and activities do not negatively impact on the local community.

The purpose of this Complaints Policy is to provide guidance on our complaints procedures to external stakeholders. If you are not content about the standard of service that you have received from us, or believe our activities are negatively impacting upon your community, then we would like to hear from you so that we can improve our services whilst reducing our impacts.

We will investigate your complaint fully and will do our best to give you a full reply within 20 working days. If we cannot give you a full reply within this time, we will tell you when we expect to do so. You can also let us know if you think there is something we have done well, or suggest ways of how we may do things better.

This policy does not include:

- Internal grievances that are managed through Human Resources processes;
- Commercial/contractual disputes that are dealt with under contractual agreements;
- Subcontract or vendor disputes that are managed through procurement agreements

1.2. Scope of Applicability

This Policy applies to [all G4S Risk Management Group Business Units](#).

1.3. Review

This Document will be reviewed from time to time to ensure suitability and adequacy.

1.4. Normative References

The following documents in whole or part are normatively referenced in this document and are indispensable in its application.

- **UN Guiding Principles on Security and Human Rights**
 - Principle 31 [available here](#)
- **The International Code of Conduct for Private Security Providers**
 - Commitment to meet Article 67 [available here](#)

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- **ANSI/ASIS PSC 1:2012** - The Management for Quality of Private Security Company Operations
 - Clause 9.5.7
- **ISO 18788:2015** – Management System for private security operations
 - Clause 8.8.3 (Summarised below):

Organisations are to establish procedures to document and address complaints received from internal and external stakeholders. Effectiveness criteria for the complaints procedure shall be established and documented. The procedure shall be communicated to facilitate reporting of non-conformances of this Standard (PSC1 and ISO 18788). Allegations shall be investigated expeditiously and impartially.

Documented Procedures shall include:

- Receiving and addressing complaints
- Establishing hierarchical steps for the resolution process
- Cooperation with official external investigation mechanisms
- The prevention of intimidation of witnesses and inhibiting evidence gathering
- The protection of individuals from retaliation

An investigation shall:

- Identify the Root Cause
- Take corrective and preventive actions including disciplinary action commensurate with any confirmed infraction
- Communication with appropriate authorities

Complaints surrounding alleged criminal acts, violations of human rights, or where there is imminent danger shall be dealt with immediately by the organisation and other relevant authorities as appropriate.

2. Roles and Responsibilities

2.1. G4S Risk Management, Managing Director

The Managing Director, G4S Risk Management Group shall:

- Manage and approve recommendations for complaints remedy
- Act as internal arbitrator
- Approve this Policy

2.2. Chief Operating Officer (COO)

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The COO shall:

- Develop and manage this Policy and its application
- Review the policy to ensure its validity
- Oversee complaints investigations and make recommendations for complaints remedy

2.3. BU Managing Directors

BU MDs shall ensure:

- Implement local complaints and grievance policies ensuring they are communicated and understood by all applicable stakeholders
- Ensure complaints are effectively addressed and investigated

3. Policy

G4S Risk Management provides high quality services in such a way as to enhance the safety and security of its staff, our clients and the communities within which we operate.

However, it is also realistic to assume that, from time-to-time, mistakes may happen or that our staff or subcontractors might not act appropriately in contravention of G4S Policies and Values.

Such examples of corporate misconduct might include:

- Inappropriate use of force
- Actions or omission that cause
 - damage or injury (personal loss)
 - offense or harm to faith, culture or heritage
 - damage or harm to the natural environment
- Actions or omissions that may otherwise impact on Human Rights and Fundamental Freedoms, in particular;
 - the right to life, liberty and security
 - torture or cruel, inhuman or degrading treatment or punishment
 - arbitrary detention
 - interference with privacy, family, home or correspondence
 - the right to freedom of movement and residence

It is therefore desirable that G4S Risk Management ensure that, should a failure occur, the following procedures are in place:

- A mechanism for external third parties to access in order to raise complaints. External parties may include:

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- Clients
- Host nation authorities
- Communities
- Members of the public
- Non-governmental organisations
- Third country civil and military authorities
- A mechanism to record, report and respond to complaints
- A complaints investigation process
- A complaints communications process
- An adjudication and resolution process

3.1. Complaints Process

3.1.1. Process Principles

The UN Guiding Principle on Security and Human Rights has established the following effectiveness criteria that G4S Risk Management shall adopt as the principles by which it shall operate its grievance mechanism:

- Legitimate – enabling trust from the stakeholder groups for whose use they are intended and for being accountable for the fair conduct of grievance processes
- Accessible – being known to all stakeholder groups for whose use they are intended and providing adequate assistance for those who may face particular barriers to access
- Predictable – providing a clear and known procedure within an indicative timeframe for each stage and clarity on the types of process and outcome available and means of monitoring implementation
- Equitable – seeking to ensure that aggrieved parties have reasonable access to sources of information, advice and expertise necessary to engage in a grievance process on fair, informed and respectful terms
- Transparent – keeping parties to a grievance informed about its progress and providing sufficient information about the mechanism’s performance to build confidence in its effectiveness and meet any public interest at stake whilst balancing the requirement of confidentiality and not prejudicing the process
- Rights Compatible – ensuring that outcomes and remedies accord with internationally recognised human rights

3.1.2. Allegations of Significant Severity

Where an alleged complaint involves allegations of criminal acts, violations of human rights or imminent danger, G4S shall respond immediately and alert the authorities as appropriate.

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3.1.3. Policy Communication

This will be done through:

- Liaison with local community
- Engagement with local authorities
- Promotion within the workforce and subcontractors
- Promotion with the client
- Publishing this Policy on the G4S Risk Management website

Throughout the complaints process communication should be maintained with the complainant so that they are engaged with and are an integrated part of the process.

3.1.4. Receiving a Complaint

There are a number of touch points that an external third party may use to raise complaints, including:

- **Email/Telephone** – Can be a call or email to a positional or named email account.
- **Incident** – An incident may occur involving a third party. The Incident Report must capture information about the third party involvement as well as damage or injuries to the third party.
- **Physical Representation** – this includes meetings such as with local communities or clients as well as staff being approached such as at a static guard post.
- **Social Media** – Comments made on platforms such as Facebook/LinkedIn/Twitter.

3.1.5. Complaints Investigation

All complaints are to be reviewed and investigated by a member of staff with no links to the case, wherever possible.

All complaints made will be managed in the strictest of confidence with resolution being sought at the earliest opportunity.

On completion of the investigation, the Investigator shall submit a detailed investigation report with recommendations for remedy.

Throughout the process, communication should be maintained with the Complainant so that they are engaged with and are an integrated part of the process.

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3.1.6. Protection of Complainant and witnesses

G4S Risk Management shall act to prevent intimidation of witnesses or inhibit the gathering of evidence. Further, G4S Risk Management shall ensure the protection of individuals submitting a complaint in good faith from retaliation.

3.1.7. Findings/Remedy and Corrective Action

The findings of the complaints investigation shall be reviewed internally along with recommendations for remedy at the appropriate level. These shall always include corrective actions to ensure that the incident does not reoccur and that the likelihood of an occurrence within another part of the operation is significantly reduced.

This shall be a consultation process, where the outcome of the investigation and the effective remedy is presented to the complainant for feedback.

The following should be considered as an effective remedy:

- Amendments to Standard Operating Procedures (SOPs), Actions ON, Safe Systems of Work etc.
- Training and Awareness – Driver Training, Cultural Awareness Training etc.
- Increased community engagement when planning and executing operations
- Ensuring industry codes of practice are met (ICoCA, PSC1, 18788)
- Verbal and/or written apology for harm or offence caused
- Compensation for damage or loss caused

3.1.8. Dialogue, Mediation and Voluntary Adjudication

Should the complainant not accept the remedy as presented, dialogue should be maintained and mediation may be offered to the third party. Internal arbitration/mediation may be entered into by staff unrelated to the operation. If the complaint remains unresolved, then G4S Risk Management will consider independent external adjudication if appropriate.

3.2. Monitoring and Reporting

The effective implementation of the complaints process shall be monitored as part of the Annual Business Operations Plan meetings.

Findings may be reported to the G4S Group and the G4S Ethics Committee, as required.

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4. Complaints Procedure

There are three stages to our complaints procedure.

4.1. Stage 1

First, if you can, try to explain your reasons of complaint to the G4S member of staff who you have been dealing with. If you are not satisfied with this outcome then please follow the [Stage 2](#) process below.

4.2. Stage 2

If you are not happy with the initial response then please contact the G4S Risk Management Office Manager via the contact details provided below and describe in as much detail as possible the reasons for your complaint.

The description should also include, where possible, the details of any G4S members of staff who may form part of your complaint.

G4S Risk Management Office Manager's contact details are as follows:

- Email: info@rm.g4s.com (a central email address, monitored at all times)
- Telephone: +971 (0)4 434 1277

4.3. Stage 3

If you are not satisfied with the response from the [Stage 2](#) process, you can email the G4S Risk Management Chief Operating Officer, with the details of your complaint.

G4S Risk Management Chief Operating Officer's contact details are as follows:

- Email: liam.kelly@rm.g4s.com
- Telephone: +44 (0) 7384 911 608 (Mobile), +44 (0) 207 963 3265 (Direct Dial)

The G4S Risk Management Chief Operating Officer will review your complaint and will start an investigation into your complaint using a member of staff with no links to the case. Finding will be communicated upon completion of the investigation.

All complaints made will be managed in the strictest of confidence with resolution being sought at the earliest opportunity.

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