



**Group 4 Security Services Lebanon  
Non Judicial External Grievance Policy**

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# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

## 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 nor 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	Operations and ISO Administrator
Approver(s)	Managing Director, G4S LB

## Version Control

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V1	May 2019	Initial version

## Internal Distribution

G4S LB Google Drive	

## External Distribution

Publically available on the G4S LB website	



# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

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## Contents

Group 4 Security Services Lebanon Non-Judicial External Grievance Policy .....	1
1. Document Control .....	4
2. Roles and Responsibilities .....	5
3. Risk Based Approach .....	6
4. Policy .....	7
5. List of Annexes .....	11
6. Annex A – Risk Assessment .....	12
7. Annex B – Process Map.....	13



Document Classification	Public	
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## 1. Document Control

### 1.1. Purpose

The purpose of this Non-Judicial External Grievance Policy and associated procedures is to:

- Establish an operational level external non-judicial grievance mechanism to address claims of alleged failure by the Company brought by third parties

It 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 business activities of G4S LB.

Grievances shall be considered as raised against G4S LB and not the individual and shall therefore always be within the remit of Group 4 Security Services Lebanon. However, where appropriate, a summary of the grievance investigation shall be shared with G4S Regional Management.

### 1.3. Review

This Policy and associated procedures will be reviewed by the Owner 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 [Download Here](#)
- ANSI/ASIS PSC1:2012 - 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)

Document Classification	Public
Version Date	May 2019
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# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

Organisations are to establish procedures to document and address grievances received from internal and external stakeholders. Effectiveness criteria for the grievance procedures shall be established and documented. The procedures 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 and grievances
- Establishing hierarchal 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 Preventative Actions including disciplinary action commensurate with any infraction
- Communication with appropriate authorities

Where Grievances allege criminal acts, violations of human rights, or imminent danger these shall be dealt with immediately by the organisation and other authorities as appropriate.

## 1.5. Terms and Definitions

Grievance	1) a real or imagined cause for complaint 2) an official statement of a complaint over something believed to be wrong or unfair made known to the Company by an External Third Party
Company	Group 4 Security Services Lebanon
Failure	Improper and/or illegal conduct to designated staff, including such acts or omissions that would violate G4S policies and or values.
Non-Judicial	Not resulting from a court ruling or judgment
External Third Party	<ul style="list-style-type: none"> <li>• Clients</li> <li>• Host nation authorities</li> <li>• Communities</li> <li>• Members of the public</li> <li>• Non-Governmental organisations</li> <li>• Third country civil and military authorities</li> </ul>

## 2. Roles and Responsibilities

### 2.1. Third Party Adjudication

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

Where appropriate, G4S LB may agree with a complainant to refer the matter to an independent third party for adjudication.

## 2.2. Group 4 Security Services Lebanon, Managing Director

The Managing Director, Group 4 Security Services Lebanon Group shall manage and approve recommendations for remedy for all grievances in Cat 3-5.

- Monitor the effectiveness of this grievance mechanism to ensure that it is fit for purpose.
- Act as the internal arbitration mechanism
- Review the annual report on grievance activity within the business and ensure preventative actions are implemented (CAPA reviews)

## 2.3. Operations and ISO Administrator

The Operations and ISO Administrator is to:

- Develop and manage this Policy and its application
- Report to the Managing Director on Grievance activities.
- Assist and advise the assignment of categories
- Investigate and make recommendations for all 3-5 Cat grievances

## 2.4. Functional Leaders

Functional Leaders are to:

- Ensure all grievances are effectively reported
- Ensure thorough and transparent investigation of all Cat 1-2 grievances
- Implement effective remedy for Cat 1-2 grievances
- Promote the procedure throughout their sphere of responsibility, its clients and with the community within which it operates

## 2.5. All Staff

It is the responsibility of all staff to act appropriately at all times in accordance with G4S policy and values.

All staff are to be made aware of this Policy and trained on the effective operation of the Grievance mechanism.

## 3. Risk Based Approach

Group 4 Security Services Lebanon has conducted a risk assessment to inform this Policy and associated procedures. See 6 Annex A – Risk Assessment.

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

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## 4. Policy

Group 4 Security Services Lebanon provides high quality services in such a way as to enhance 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
- 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 Group 4 Security Services Lebanon ensure that, should a failure occur, the following procedures are in place:

- A mechanism for External Third Parties to access in order to raise a Grievance
- A mechanism to record, report and respond to the Grievance
- An investigation process
- A communications process
- An adjudication and resolution process

Of vital importance is the need for trained and competent management to act appropriately.

### 4.1. Process Map

The Process Map is at 7 Annex B – Process Map

Procedures must be fair, accessible and offer effective remedies, including recommendations for the prevention of recurrence.

When interacting with an External Third Party, always remain calm and do not aggravate the situation.

- Do not admit liability
- Take as much information as possible including from witnesses where possible.

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



# Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

An Incident Report shall be issued and all information and documentation should be retained in the appropriate folder within Google Drive, applying appropriate security and data protection protocols.

## 4.2. Third Party Grievance Process

### 4.2.1. Localised Process

Wherever practical, Group 4 Security Services Lebanon will engage and consult with external stakeholders for the development of its localised grievance mechanism. However, this may not always be possible due to both risks to G4S staff and clients and local stakeholders themselves.

### 4.2.2. Client Process

Group 4 Security Services Lebanon will engage with its Clients to ensure an integrated approach to third party stakeholder management.

### 4.2.3. Process Principles

The UN Guiding Principle on Security and Human Rights has established the following effectiveness criteria that Group 4 Security Services Lebanon 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

### 4.2.4. Allegations of Significant Severity

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

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded





## Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

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### 4.2.5. Process Communication

Group 4 Security Services Lebanon shall promote this grievance process and improve awareness of its existence and how it may be accessed. This will be done through:

- Liaison with local community
- Engagement with local authorities
- Promotion within the workforce and subcontractors
- Promotion with the client
- Including a description and link on the G4S LB website

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

### 4.2.6. Receiving a grievance

There are a number of touch points that an external third party may use to raise a grievance. They are as follows:

**Email/Telephone** – Can be a call or email to positional or named email account.

**G4S Speak Out** – See Whistleblowing Policy

**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.

Whilst there are a number of touch points whereby an external third party may raise a grievance, it is important that the grievance is received, identified as such, recorded, communicated and actioned internally within Group 4 Security Services Lebanon.

In order to do so, management must recognise the grievance and take the appropriate action. Staff should acknowledge receipt of the grievance without admitting any liability and attempt to record as much information as possible.

The grievance information should be detailed in an Incident Report and, depending upon the severity of the potential impact, assigned a category.

In order to assess the potential impact, guidance should be sought from the Director, Secure Services.

### 4.2.7. Strategic Communication - Reporting

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



## Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

Should the grievance be considered of strategic significance, the Incident Report detailing the alleged grievance shall be communicated to the Regional Director. Group 4 Security Services Lebanon Managing Director shall review and agree the category and amend as necessary.

### 4.2.8. Grievance Management – Assigning a category

The potential severity of the grievance and the maturity of the function will determine the level of strategic response to manage the grievance. As a general rule, all grievances categorised as 1-2 shall be managed by the functional leader and categories 3-5 by the Managing Director.

### 4.2.9. Grievance Investigation

Once the grievance has been reported, assigned the appropriate category and the appropriate level of management response established, the grievance will be expeditiously and impartially investigated. Where appropriate the investigation shall cooperate with official external investigation mechanisms. The internal investigation shall be carried out in accordance with the Conducting Internal Investigations Procedure.

On completion of the investigation, the Lead Investigator shall submit a detailed investigation report to the Investigation Authority. The report will include recommendations for remedy.

### 4.2.10. Protection of complainant and witnesses

Group 4 Security Services Lebanon shall act to prevent intimidation of witnesses or inhibit the gathering of evidence. Further Group 4 Security Services Lebanon shall ensure the protection of individuals submitting a complaint or grievance in good faith from retaliation.

### 4.2.11. Findings/Remedy and Corrective Action

The findings of the 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 effective remedy:

- Amendments to TTP, 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 (ICOC, PSC1, 18788)
- Verbal and/or written apology for harm or offence caused
- Compensation for damage or loss caused

### 4.2.12. Dialogue, Mediation and Voluntary Adjudication

Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



## Group 4 Security Services Lebanon Non-Judicial External Grievance Policy

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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. This shall be the responsibility of the Group 4 Security Services Lebanon Managing Director. If the grievance remains unresolved, then Group 4 Security Services Lebanon will consider independent external adjudication if appropriate.

### 4.3. Monitoring and Reporting

The effective implementation of the grievance process shall be monitored by the Managing Director, Group 4 Security Services Lebanon.

## 5. List of Annexes

- Annex A – Risk Assessment
- Annex B – Process Map



Document Classification	Public	
Version Date	May 2019	Uncontrolled if printed or downloaded



**Group 4 Security Services Lebanon**  
**Annex B to**  
**Non-Judicial External Grievance Policy**

**6. Annex A – Risk Assessment**

Serial	Risk	Likelihood	Impact	Inherent Risk	Controls	Likelihood	Impact	Residual Risk
1	Conflict with local stakeholders leading to lack of freedom of movement, loss of “social license”	4	4	8	Adherence to G4S values and Policy commitments. Engagement and consultation with stakeholders	2	2	4
2	No effective grievance mechanisms leading to resentment with local stakeholders	3	4	7	G4S RM grievance mechanisms aligned to Principles contained in the UNGPS&HR	1	2	3
3	Lack of effective remedy	3	4	7	Management oversight and arbitration process	1	2	3

**Summary:**

Any unresolved conflict with no transparent means of resolution has the potential to harm operations. Maintaining the “social license” to operate within the communities affected by our operations is the key. Prevention of conflict through the ethical implementation of security services respecting human rights combined with a consultation and engagement process shall ensure that Group 4 Security Services Lebanon maintains freedom of movement to operate and reduces the possibility for physical, reputational and financial harm.



# Group 4 Security Services Lebanon Annex B to Non-Judicial External Grievance Policy

## 7. Annex B – Process Map

The below process map shows the key stages of the grievance process. The example used is of an incident occurring during a mobile operation as experience has shown that the most common occurrence involving a third party is an RTI. In a hostile situation staff should initially refer to SOP “Actions On” as the security and safety of the client and G4S staff are paramount. However, where possible, the following should apply:

