



Grievance Mechanism Procedures

2025

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Grievance Mechanism Procedures

1) Purpose & Alignment

Prime Security maintains a company-wide grievance, whistleblowing, and incident-reporting mechanism that:

- Meets ICoCA requirements for fairness, accessibility, legitimacy, predictability, transparency, rights-compatibility, and equity.
- It is embedded in ISO 18788 / PSC.1 management system (documented procedures, roles, records, corrective actions, performance monitoring).
- Applies UNDSS/UNSMS safety and risk-management principles (do-no-harm, survivor-centered handling, protection measures, context/risk triage).

Scope: All operations and roles (armed/unarmed, CP, CIT, transport, static guarding, crowd management), and all stakeholders (personnel, subcontractors, clients, local communities).

2) Principles

- **No retaliation:** Strict prohibition of reprisals against complainants, witnesses, or facilitators.
- **Confidential & survivor-centered:** Confidential handling; anonymity accepted; special safeguarding for SEA (sexual exploitation/abuse), children, and vulnerable groups.
- **Accessibility:** Multiple reporting channels; free of charge; available in relevant local languages; disability-inclusive.
- **Timely, predictable process:** Standard steps with clear timelines (see §5).
- **Impartiality & fairness:** Competent, trained investigators; conflict-of-interest screening; appeal route.

- **Rights-compatible outcomes:** Remedies that respect human rights and legal obligations; coordination with state-based remedies as needed.
- **Continuous improvement:** Lessons learned feed risk controls and training (ISO 18788/PSC.1).

3) Intake & Access Channels

Complainants (internal or external) may use any of the following, 24/7 where feasible:

- Dedicated hotline (voice/WhatsApp/SMS) and confidential email
- Online form/QR on our website;
- On-site secure drop boxes and frontline supervisors;
- Community focal points (for local stakeholders);
- An anonymous option is available for all channels.

All channels are advertised at posts/sites in appropriate languages; staff and subcontractors receive induction/refresher briefings on how to use them.

4) Triage, Safety & Eligibility

Upon receipt, the Grievance Officer (or duty manager) immediately:

- **Registers** the complaint (unique case ID; minimal data principle).
- **Assesses risk** (UNDSS-style SRM triage): imminent safety threats, SEA, child safeguarding, armed incidents, weapons loss, data breaches.
- **Activates protection measures** as needed (separate parties, medical/psychosocial support referral, temporary reassignment, weapon withdrawal, site security adjustments).
- **Determines eligibility** (any improper/illegal conduct, Code/Policy breaches, HR violations, community impact issues). Non-eligible matters receive guidance/referral (e.g., customer service queries).

5) Standard Process & Timelines

Step	Action	Target timeline
Acknowledgment	Confirm receipt; share case ID; explain process & protections	Within 3 business days
Preliminary review	Triage risk, define scope, assign case officer, collect initial facts	Within 5 business days
Investigation	Interviews, evidence review, site checks; impartial and documented	Within 30 calendar days (complex cases may extend with written notice)
Determination	Findings, policy analysis (ICoCA/ISO/PSC.1), proposed outcomes	Within 10 days after the investigation
Communication	Share outcome (to the extent permitted), next steps, remedies/appeal info	Within 5 days of determination
Remedy & CAP	Implement remedy and Corrective Action Plan (CAP); monitor closure	As scheduled, tracked to completion
Appeal	Independent/second-level review on request	Within 15 days of the outcome notice

SEA or high-risk cases: accelerated handling; survivor-centered approach; immediate protection and referral pathways.

6) Investigation & Decision-Making

- Led by trained, impartial personnel, specialist external investigators may be engaged where appropriate.
- **Evidence-based:** documents, logs (CCTV/incident reports), access records, interviews, medical/forensic (if applicable).

- **Standards applied:** ICoCA code, Use-of-Force policy, HR policies, site SOPs, local law, client requirements.
- **Conflict-of-interest** checks for all investigators/decision-makers.

7) Remedies & Corrective Actions

Remedies are proportionate, rights-compatible, and tailored, which may include:

- **Individual:** apologies, re-training, counseling, medical/psychosocial support referrals, reassignment.
- **Disciplinary:** warnings, suspension, termination, report to authorities.
- **Operational:** SOP changes, staffing adjustments, equipment upgrades, enhanced supervision.
- **Restitution/compensation:** where appropriate and lawful.
All remedies feed a Corrective Action Plan with owners and due dates (ISO 18788/PSC.1).

8) Protection, Confidentiality & Data Privacy

- Data handled under need-to-know, securely stored with restricted access and retention per law/contract.
- Anonymous reports accepted; identities protected where disclosure is not legally required.
- No retaliation is enforced via monitoring; any reprisal triggers immediate disciplinary action.

9) Inclusion of Subcontractors & Third Parties

- Contracts flow down grievance obligations to subcontractors and affiliates.
- Subcontractor workers and community members can access the same channels.

- Prime Security audits subcontractor handling and may take direct action on unresolved/serious cases.

10) Transparency, Monitoring & Improvement

- **KPIs:** number of cases, types, closure times, remedy rates, recurrence, and training actions.
- **Management review** (quarterly) evaluates trends, systemic risks, and prevention measures.
- **Training:** lessons learned translated into targeted training and SOP updates.
- **Reporting:** aggregated (non-identifying) statistics may be shared with clients/ICoCA or in ESG disclosures.

11) Appeals & External Options

- Complainants may request an independent appeal within 15 days of the outcome notice.
- Mechanism does not preclude access to state-based remedies, ICoCA mechanisms, or client grievance systems.

12) Roles & Responsibilities

- **Board/Top Management:** oversight, resources, and a non-retaliation culture.
- **Grievance Officer (GO):** system administration, triage, coordination, reporting.
- **Investigations Team:** impartial fact-finding and documentation.
- **HR/Operations/Compliance:** implement remedies, CAP, and follow-up.
- **All Personnel:** duty to report, cooperate, uphold confidentiality, and non-retaliation.

Statement of Assurance

Prime Security confirms this mechanism is active, accessible, and continuously improved in line with ICoCA, ISO 18788, PSC.1, and UNDSS/UNSMS best practices, ensuring effective, safe, and rights-compatible resolution of grievances.