
Sanctuary Group

Title: **Grievance - Group Procedure**

Business functions: **Applicable to all functions across Sanctuary Group**

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Authorised by: **Executive Director - Corporate Services**

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Objective

To outline a process for dealing with employee concerns and grievances relating to their work, the workplace, or someone they work with (this includes management).

Document applies to

Colleagues raising a grievance

Managers handling the grievance investigation, meeting and appeal process

Review

Date	Details
October 2026	Formal review, with following changes: • Information at section 1 updated to reflect the Bullying, Harassment, and Sexual Harassment - Group Procedure and reference to the Employment Rights Act 2025. • Section 2 strengthened to emphasise the informal procedure. Information at 3.2.1 on the use of Artificial Intelligence (AI) in the submission of grievances and at 3.3.1, Appealing the decision. • Inclusion of health-based adjustments at 3.2.1 and 3.3.1. • Amendments at section 3.3.7, anonymous complaints and grievances to reflect the Whistleblowing - Group Policy and Procedure. • Addition of 4.4 to explain facilitated meetings. • Amendment to Appendix 1 to include additional touchpoints and update from HRBP to People Business Partner. • Amendment to Appendix 2 to reflect change from HRBP to People Business Partner.

Appendices

Appendix 1 - Formal Grievance Procedure - Stage 1 (Grievance)

Appendix 2 - Formal Grievance Procedure - Stage 2 (Appeal)

1. Introduction

- A colleague grievance is a concern, problem, or complaint that a colleague has about their work, the workplace, or someone they work with (this includes management). This also includes concerns regarding discrimination, bullying and harassment (including sexual harassment).
- Colleagues should speak to each other informally to try and resolve concerns early and to prevent unnecessary escalation. Addressing an issue early and informally may lead to a quicker resolution that can be beneficial for everyone involved.
- It is important that grievance concerns are not confused with concerns of a whistleblowing nature. Please refer to the [Whistleblowing - Group Policy and Procedure](#) and also speak to your People Business Partner, if you have any concerns about the nature of your grievance.
- Where there are concerns of both a grievance and a whistleblowing nature, these elements will be dealt with via the appropriate procedure and may be managed concurrently.
- The Group takes its duties to prevent sexual harassment and third-party harassment of our colleagues in the workplace under the Worker Protection (Amendment of Equality Act 2010) Act 2023 and the Employment Rights Act 2025 seriously. More details can be found in the [Bullying, Harassment, and Sexual Harassment - Group Procedure](#).
- This Procedure is an appropriate formal way to raise concerns about any kind of harassment, including sexual or third-party harassment, by a colleague.
- The [Whistleblowing - Group Policy and Procedure](#) is the appropriate way to raise concerns about any kind of harassment, including sexual or third-party harassment by a third party.
- Concerns about sexual or third-party harassment by a customer should be raised with the manager responsible for that service.
- Complaints relating to data protection matters, including concerns about the handling, processing and sharing of personal data, data breaches, or responses to individuals' rights requests, fall outside of this procedure. These complaints are managed separately by the Data Protection team in accordance with the [Data Protection - Group Policy and Procedure](#).

2. Informal procedure

2.1 Employee guidance:

- Every effort should be made where possible, to resolve concerns informally.
- We encourage you to speak to your line manager about any concerns you have, or if you feel unable to speak to your line manager, you could speak to another manager or your People Business Partner.
- Where you feel an informal approach is not appropriate, you may want to discuss this with your People Business Partner in the first instance.

2.2 Manager guidance:

- Every effort should be made where possible, to resolve concerns informally, without escalating them unnecessarily. If a colleague comes to you with a concern or complaint, try and address it promptly and informally if you can.
- Listen to what they have to say and discuss what is needed to resolve it. If more information is needed, please look further into it. Sometimes a few conversations may be needed to fully understand and resolve an issue.
- In some cases, mediation or a facilitated conversation may be useful.
- Please keep a record of the informal grievance, discussion(s) and outcome.
- If ongoing steps are needed to resolve the concern, it is good practice to communicate regularly with the colleague to provide reassurance that their concern is being taken seriously.

3. Formal procedure

3.1 Process maps

- Formal Grievance Procedure - Stage 1 (Grievance) - **Appendix 1.**
- Formal Grievance Procedure - Stage 2 (Appeal) - **Appendix 2.**

3.2 Employee guidance

3.2.1 Raising a grievance:

- If you feel that the informal procedure is not suitable, or has not fully resolved your concerns, you may wish to raise your grievance formally in writing to your line manager, or another appropriate manager.
- When raising a grievance, it is important to explain:
 - the nature of your concern;
 - how you would like it to be resolved; and
 - what actions you may have already taken to resolve your concerns informally, where possible, or the reason why informal steps were not taken.
- If you use AI tools to assist in preparing your grievance, any use of AI must be in line with the [AI - Group Policy](#) relating to confidentiality, data protection, information security and acceptable use of technology.
- Where a grievance is lengthy, unclear and/or contains extensive legal, technical or AI-generated terminology, you may be asked to provide clarification and a summary of the concerns, so that your concerns can be fully understood, investigated and addressed appropriately and proportionately.
- You should be aware that, if you are raising a grievance against another colleague at Sanctuary Group, the individual(s) concerned will be made aware of this.
- If you are raising a grievance in conjunction with colleagues (a collective or group grievance), you should agree a maximum of two individuals to represent the group concerned.

- You have the right to be accompanied to any formal meeting by a current work colleague, staff council representative, or trade union representative. Please note, it may not always be appropriate for your selected work colleague to be your companion, for example, if they are too closely involved in the matter, impartiality, etc. The People team will advise.
- Where a collective grievance is being considered, up to two employees may attend the meeting on behalf of the group. Those representatives may also be accompanied by a companion in line with this procedure.
- If your companion cannot attend on the proposed date, you can suggest an alternative date so long as it is reasonable and is not more than five working days after the proposed original date.
- Upon receipt of a formal grievance and with your agreement, you may be allocated an appropriate nominated person to support you during the grievance process. This will not replace your line manager and in some cases may be your line manager, where appropriate. The role of this nominated person will be to check in with you regularly to ensure that you are receiving support whilst your grievance is ongoing. If you have not been appointed a nominated person and feel this would be beneficial, please feel free to request one.

3.2.2 Health based adjustments to the process:

- If you have a disability, long-term health condition or other health-related needs and you need an adjustment to fully take part in the grievance process, please let the manager addressing your grievance, or the People Business Partner know. We will consider and implement reasonable adjustments to support your full participation throughout the grievance process.

3.2.3 Grievance meeting:

- Once you have formally raised your concerns, your manager, or the manager assigned to hear the grievance, will invite you to a meeting to discuss your concerns.
- Following the meeting, the manager will usually carry out an investigation, which may include speaking to others and gathering any relevant documentation, before making their decision. The manager will send you an outcome letter explaining their decision. This will normally be sent within 14 calendar days.

3.2.4 Appealing the decision:

- If you are not satisfied with the outcome of your grievance, you may submit a formal appeal. This could be if you have new evidence to show or if you believe your grievance outcome is wrong.
- You should appeal in writing to the senior manager as outlined in your grievance outcome letter within seven calendar days of receipt of the grievance outcome letter.
- Your appeal should clearly state the grounds of your appeal, i.e., the basis on which you consider that your grievance has not been satisfactorily resolved.

- If you use AI tools to assist in preparing your appeal, any use of AI must be in line with the [AI - Group Policy](#) relating to confidentiality, data protection, information security, and acceptable use of technology.
- Where an appeal is lengthy, unclear and/or contains extensive legal, technical or AI-generated terminology, you may be asked to provide clarification and a summary of the concerns, so that these can be fully understood, investigated and addressed appropriately and proportionately.
- The senior manager will invite you to an appeal hearing to understand the reason(s) for appealing.
- They may carry out further investigation, if this is appropriate or required. They will then notify you of the outcome of your appeal by writing within 14 calendar days.

3.3 Manager Guidance

3.3.1 What should you do when a grievance is raised?

- If a colleague raises a formal grievance, you must inform your People Business Partner before any formal action takes place as they can provide support and may assist with the appropriate process and grievance meetings.
- Formal grievances will normally be received in writing. For those occasions whereby a grievance is raised verbally, please take notes, and then send an email to the colleague summarising their concerns, asking for them to confirm that you have captured their concerns correctly.
- If the grievance is lengthy, unclear, contains legal, technical or AI-generated terminology, and/or does not clearly identify the concerns being raised, you may ask the employee to clarify, summarise, or explain the issues to ensure that you fully understand the concerns.

3.3.2 Health based adjustments to the process:

- If the colleague raising the grievance has a disability, long-term health condition or other health-related needs and needs an adjustment to fully take part in the grievance process please the People Business Partner know, so that you can discuss and implement reasonable adjustments to support the colleague's full participation throughout the grievance process.

3.3.3 Grievance meeting:

- Upon receipt of the grievance, you should acknowledge it in writing and invite the individual to a meeting to discuss and fully understand their concerns, and how their grievance could be resolved.
- Colleagues have the right to be accompanied to any formal meeting by a current work colleague, staff council representative, or trade union representative. Where the individual opts to be accompanied by a trade union official, Sanctuary reserves the right to ask to see official identification from the representative.

- Where a formal grievance is raised, then you should discuss with your People Business Partner whether an additional nominated person is required to provide support to the employee that has submitted a grievance. Where necessary, this should be discussed and agreed with the colleague.
- Please note where it is unclear if the concerns are of a grievance or a whistleblowing nature, please liaise with your People Business Partner for guidance.
- A representative from People Services must be in attendance at all grievance where allegations of discrimination or whistleblowing are being made, including harassment and sexual harassment.
- After the meeting, you may need to carry out an investigation to determine whether the colleague's concerns can be upheld, and what action may be appropriate to resolve the situation.

3.3.4 What is an investigation?

- An investigation should usually take place after the grievance hearing, depending on the nature of the grievance, to establish whether there are grounds to uphold the concerns or not.
- Any grievance investigation should be impartial and thorough and may be carried out by either the grievance manager or an appointed investigation officer.
- An investigation may involve:
 - interviewing the individual who has raised the grievance;
 - interviewing the subject of the grievance;
 - interviewing any other relevant individuals (for example, potential witnesses); and
 - obtaining and analysing any documentary evidence (documents, records, timesheets, reports, diary notes, calendar entries, Teams messages, WhatsApp messages, etc).
- The objective is to gain a clear understanding of the grievance and the impact on the colleague raising it, the evidence relevant to the concerns raised in the grievance and whether they should be upheld or not upheld.
- In some circumstances it may be necessary for a grievance report to be compiled.
- Please ask a notetaker to join you at any investigation meetings to ensure there is a good record of the conversation.
 - In some circumstances it may be necessary for a grievance report to be compiled. A written investigation report would normally be prepared where the grievance involves multiple or serious allegations, materially disputed evidence, several witnesses, complex documentation, allegations of discrimination or harassment, or where the investigation is undertaken by someone other than the grievance decision-maker. In straightforward cases, a separate report may not be necessary where the outcome letter itself clearly records the issues investigated, relevant evidence, findings and reasons. The approach should be agreed with the People Business Partner.

3.3.5 What happens after an investigation?

- Either:
 - Invite the colleague to a meeting to discuss the findings of the investigation and follow this up with an outcome letter.
- Or:
 - if the grievance meeting took place prior to the investigation, send the outcome letter.
 - If the investigating officer makes any operational recommendations as a consequence of the grievance investigations, it is the responsibility of the investigating officer to liaise with the relevant manager to discuss their recommendations.

3.3.6 Outcome letter:

- The outcome letter must be based on information gathered in the investigation report and the grievance hearing. It should set out, for each concern raised, the issues investigated, relevant evidence, findings and reasons for upholding or not upholding each concern.
- The outcome should be provided in writing to the colleague within 14 calendar days of the grievance meeting.
- If this is not possible, the colleague must be notified of the delay, the reasons for this, and when they can expect to receive an outcome.
- All outcome letters must be reviewed by the relevant People Business Partner or People Business Manager prior to being sent to the employee.

3.3.7 Appeal:

- Upon receipt of an appeal, acknowledge the appeal.
- Review the employee's grounds of appeal and any supporting documentation submitted. The appeal should focus on the reasons why the employee believes the grievance outcome was unsatisfactory.
- Where the appeal is lengthy, unclear, and/or contains extensive legal, technical or AI-generated terminology, you may request clarification or a summary of the key concerns to ensure they can be fully understood and considered appropriately and proportionately.
- Invite the employee to an appeal hearing, giving reasonable notice and reminding them of their right to be accompanied in accordance with this procedure.
- The purpose of the appeal hearing is to understand the employee's reasons for appealing and to review whether the grievance has been handled fairly and the outcome was reasonable in the circumstances.
- You may undertake further enquiries or investigations where this is necessary to fully consider the grounds of appeal.
- Following the appeal hearing and any further investigation, determine whether:
 - the original grievance outcome should be upheld;
 - the original grievance outcome should be amended; or
 - the appeal should be upheld and an alternative outcome provided.

- Communicate the appeal outcome in writing, normally within 14 calendar days of the appeal hearing or completion of any further investigation. Where this is not reasonably practicable, the employee should be kept informed of the reasons for the delay and the anticipated timescales.
- The outcome of the appeal is final and marks the end of the grievance procedure.

3.3.8 Anonymous complaints or grievances:

- When an anonymous grievance is received, managers should seek advice from their People Business Partner and decide which is the correct procedure to apply. Complaints about serious wrongdoing, risk, serious failings affect others/the wider public interest and/or third party harassment may be addressed under the [Whistleblowing - Group Policy and Procedure](#).
- Anonymous complaints should be taken seriously. Where an anonymous complaint does not contain enough information to complete a full investigation, the manager should, with advice from the People Business Partner, consider what proportionate enquiries or other action can reasonably be taken. This may include reviewing available records or other objective evidence, speaking confidentially with individuals who may have relevant information, monitoring identified risks or workplace patterns, reminding employees of the available reporting routes and protections against victimisation, or taking preventative action such as reviewing working arrangements, risk assessments, training, or management oversight.
- The manager should keep a written record of the information considered, the enquiries undertaken, any limitations caused by the complaint being anonymous, and the reasons for the action taken or for deciding that no further investigation is reasonably possible. The position should be reviewed if further information becomes available.

3.3.9 Post-employment grievances:

- If a grievance is raised by a colleague who has resigned, is on garden leave, or is working their notice period, the standard grievance procedure will apply.
- If a colleague raises concerns when resigning, the People Business Partner will write to them, inviting them to a meeting to discuss their concerns. If the matter cannot be resolved informally and the individual wishes to proceed with a formal grievance, the standard grievance procedure will apply.
- Should a grievance be raised post-termination of employment and within 14 calendar days of the last date of employment, the Group will:
 - invite the individual to a meeting to discuss the grievance within 14 calendar days from receipt of the grievance (where practicable);
 - decide whether to address it informally or formally;
 - conduct any investigation required; and
 - respond in writing to the individual within seven calendar days (where practicable) from the date of the meeting with them.

- Should the individual not wish to meet with the manager either informally or formally, the manager should still conduct stages 2 and 3 of the above.
- There is no right of appeal against the decision made for a post termination grievance.

4. Mediation

4.1 What is mediation?

- A voluntary and confidential process where impartial mediators are appointed to support two or more people in reaching an agreement.

4.2 When can mediation be helpful?

- Mediation can be used at any stage; however, it is especially effective when used at the initial stages of any disagreement before conflict escalates.
- It can be used prior to formal procedure, or as an agreed outcome to a formal procedure.
- It may be appropriate in the following circumstances:
 - for conflict involving colleagues or between a line manager and their colleague(s);
 - to rebuild relationships after a formal dispute has been resolved; or
 - to address a range of issues, including relationship damage, personality clashes, communication matters, perceived bullying, and harassment.

4.3 How to arrange mediation:

- If you wish to use mediation to help resolve a workplace dispute, contact your line manager or People Business Partner.

4.4 Facilitated conversation:

- Alternatively, a 'facilitated meeting' can be arranged with the affected parties, facilitated by a People Business Partner, as part of the informal process. This is an informal structured conversation between colleagues, with a neutral person (a manager or People Business Partner) to help colleagues explain their concerns, listen and explore practical ways of improving the relationship.

5. Grievances and disciplinary action

- If the grievance procedure indicates that a breach of rules, policies or procedures has taken place by the person bringing the grievance or any colleague, then evidence collected under the grievance procedure, may be used in a disciplinary hearing process.
- A separate investigation for the purpose of a disciplinary hearing may not therefore be necessary. This can reduce the stress on colleagues who would otherwise be involved in two separate investigations.
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- If the issues a colleague has raised result in disciplinary proceedings involving another person, they will be expected to engage in any investigation into the matters raised under those proceedings.
- Any disciplinary action will be managed in line with the [Disciplinary - Group Procedure](#).

6. If a grievance is raised against you

- If a grievance is raised against you, as part of the process, you will be notified, and the matter will be discussed with you.
- You may wish to have an appropriate nominated person to support you throughout the grievance process. Please liaise with your People Business Partner if this is something you would value.
- You will receive an outcome letter, or verbal feedback as appropriate, advising what the outcome of the grievance is specific to any concern raised in respect of you and what next steps, if appropriate are being taken.

7. Keeping records

- The detail and records of grievance related matters are confidential, and all parties involved in the grievance process are to maintain the confidential nature of the process. Failure to do so may lead to disciplinary action.
- Records should detail the nature of the grievance and any subsequent action taken, to include any notes of investigation meetings carried out, as above.
- Once the matter has concluded, all records should be kept on employee files as appropriate.
- Cases are also recorded on Radar for the purposes of case management, monitoring and assessment of any emerging trends.
- Records are held on the employee's personnel file and OneSanctuary in accordance with the [Data Protection Act and General Data Protection Regulations 2018](#).