

NEC SECURITY SERVICES (SMC) LIMITED



NEC/SOMS/OP/016

INTERNAL AND EXTERNAL COMPLAINT AND GRIEVANCE PROCEDURE

REFERENCE DOCUMENTS	
Document Reference	Document Title
ISO 18788:2015	Private Security Operations Management System
NEC/SOMS/001	NEC Security Operations Management Systems Manual
The Code	International Code of Conduct for Private Security Service Providers.
UNGPs	United Nations Guiding Principles business and human rights
UPF Handbook	The Uganda Police Force Handbook on the Use of Force and Firearms

Approved by	General Manager	Approval Date: 6/1/2026 Sign: 
Reviewed by:	Operations Manager	
Prepared by:	QHSE Head	





1. Purpose

The purpose of this procedure is to provide a fair, accessible, transparent, and accountable mechanism through which any person may raise concerns relating to the organization's operations, including misconduct, service delivery issues, human rights concerns, or violations of legal, contractual, or organizational requirements.

The procedure ensures that all complaints and grievances are addressed promptly, impartially, and in a manner that protects individuals from retaliation while promoting continuous improvement.

2. Scope and Applicability

- a) This procedure applies to all complaints and grievances raised by:
 - a. Employees and persons working on behalf of NEC Security Services (SMC) Limited
 - b. Clients and their representatives
 - c. Members of the public and local communities
 - d. Contractors, suppliers, and other stakeholders
- b) Complaints may arise from internal employment-related issues, while grievances may arise from external stakeholders affected by NEC operations.
- c) However, the organization treats both categories under a unified system to ensure consistency, fairness, and accountability.
- d) Matters covered under this procedure include, but are not limited to:
 - a. Misconduct, abuse of authority, or unethical behaviour
 - b. Human rights violations, including excessive use of force
 - c. Harassment, discrimination, or workplace grievances



- d. Security failures or negligence
- e. Loss, theft, or damage to property
- f. Breach of contractual obligations
- g. Non-compliance with laws, ISO 18788, ICoC, or internal procedures

3. Principles of the Complaint and Grievance Mechanism

- a) NEC Security Services (SMC) Limited ensures that its complaint and grievance mechanism is accessible, impartial, timely, confidential, and protective.
- b) The organization guarantees that any individual may submit a complaint or grievance without fear of intimidation, discrimination, or retaliation.
- c) Any act of retaliation against a complainant, witness, or participant in an investigation is strictly prohibited and shall result in disciplinary action.
- d) All complaints shall be treated with confidentiality and handled sensitively.
- e) Information shall only be disclosed where necessary for investigation or where required by law.
- f) The organization further ensures that all complaints are handled objectively, without bias or conflict of interest, and that decisions are based on facts and evidence.

4. Submission of Complaints and Grievances

All **external complaints and grievances** from clients, members of the public, or other stakeholders shall be received and coordinated by the **Sales and Marketing Department**, which serves as the official external interface of the organization.

The Sales team shall act as the primary entry point, ensuring that all external complaints are formally captured, acknowledged, and forwarded to the appropriate department for action.



All **internal complaints and grievances** raised by employees or persons working on behalf of the organization shall be submitted through the **Human Resource Department**, which serves as the central function for handling employee-related concerns.

Employees may submit complaints directly to HR or through their supervisors, who shall forward such matters to HR without delay.

Complaints may be submitted verbally or in writing. Where complaints are received verbally, the receiving officer shall document the **complaint using HR complaint and grievance register**.

Complainants are encouraged to provide sufficient details, including the nature of the complaint, date, location, persons involved, and any supporting evidence.

However, complaints shall not be rejected solely due to lack of detailed information.

Anonymous complaints shall be accepted and assessed, although investigation may be limited by the availability of information.

5. Receipt, Registration and Initial Assessment

Upon receipt of a complaint or grievance, the responsible receiving function shall formally register the complaint in the complaint and grievance register.

- a) **The Sales and Marketing Department shall register all external complaints in the External Complaints Register**
- b) **The Human Resource Department shall register all internal complaints in the Internal Complaints Register**

The receiving function shall conduct an initial assessment to determine:

- a) Nature and classification of the complaint
- b) Severity and urgency
- c) Department responsible for resolution



- d) Whether the matter involves human rights, legal, or criminal implications.

The organization shall acknowledge complaints and that the complainant shall be informed that the matter is under review.

Complaints involving imminent danger, serious harm, or criminal activity shall be immediately escalated to management and relevant authorities.

6. Categorization and Escalation

Following registration, complaints and grievances shall be assigned to the relevant department for investigation and resolution.

- a) Operational issues shall be assigned to the Operations Department
- b) Employee conduct or disciplinary matters shall be handled jointly by HR and Operations
- c) Compliance, legal, or system-related issues may involve the QHSE function

The Sales and Marketing Department shall remain responsible for tracking and coordinating all external complaints, ensuring that they are followed through to resolution.

The Human Resource Department shall coordinate all internal complaints, ensuring proper handling, confidentiality, and compliance with labour requirements.

Where complaints are serious, involve human rights concerns, or carry reputational or legal implications, they shall be escalated to the Operations Manager and General Manager for oversight and decision-making.

Under no circumstances shall a complaint be suppressed or handled informally where escalation is required.

7. Investigation Process



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- a) For external complaints, the Sales and Marketing Department shall remain the coordinating function and shall ensure that the complaint is properly tracked and followed through.
- b) However, the actual investigation shall be conducted by the relevant technical department, primarily the Operations Department, depending on the nature of the complaint.
- c) For internal complaints, the Human Resource Department shall take the lead in coordinating and overseeing the investigation, particularly where employee conduct, welfare, or disciplinary matters are involved.
- d) Upon assignment, the responsible department shall initiate a formal investigation, which shall begin with a clear definition of the scope of the complaint and identification of the persons involved.
- e) The investigation shall include a systematic collection of evidence, including written statements, incident reports, logs, CCTV footage (where available), and any other relevant documentation. Interviews shall be conducted with the complainant, the subject of the complaint, and any witnesses, ensuring that all parties are given a fair opportunity to present their account.
- f) Throughout the investigation, NEC Security Services (SMC) Limited shall ensure that confidentiality is maintained and that no party is subjected to intimidation, coercion, or retaliation.
- g) The organization shall take deliberate steps to protect complainants and witnesses, including restricting unnecessary disclosure of information and ensuring that supervisors do not interfere with the process.
- h) Where a complaint involves allegations of criminal conduct, serious injury, use of force, or human rights violations, the organization shall immediately notify the Uganda Police Force and shall not undertake any actions that may compromise official investigations. In such cases, NEC's internal investigation shall be limited to



administrative review and shall be conducted in a manner that fully supports and does not interfere with law enforcement processes.

- i) The investigation shall be completed within a reasonable timeframe depending on the complexity of the case, and all findings shall be documented clearly and objectively.

8. Resolution and Hierarchical Decision-Making

- a) Upon completion of the investigation, the responsible department shall prepare a detailed report outlining the facts established, the analysis of the complaint, and recommended actions.
- b) This report shall be submitted to the appropriate level of management depending on the nature and severity of the complaint.
- c) For routine operational matters, the Operations Manager shall review the findings and decide on the appropriate resolution, including corrective actions required at site level.
- d) For complaints involving employee conduct, disciplinary matters, or workplace grievances, the Human Resource Manager shall review the findings and ensure that any decisions are consistent with labour laws, internal policies, and principles of fairness.
- e) For serious, sensitive, or high-risk complaints—particularly those involving human rights concerns, reputational impact, or legal implications—the matter shall be escalated to the General Manager, who shall make the final decision based on the investigation report and recommendations provided.
- f) The General Manager shall ensure that decisions are justified, documented, and defensible.
- g) Where the complaint involves criminal conduct or matters under the jurisdiction of law enforcement, the organization shall defer to the Uganda Police Force or relevant authority for final determination, while implementing any internal administrative actions as appropriate.



- h) Throughout the resolution process, NEC shall ensure that decisions are not influenced by personal bias, conflict of interest, or external pressure, and that all parties are treated with fairness and respect.

9. Corrective, Preventive and Disciplinary Actions

- a) Following resolution, the organization shall conduct a root cause analysis to determine why the issue occurred, whether due to human error, procedural gaps, inadequate supervision, or systemic weaknesses.
- b) Based on this analysis, corrective actions shall be implemented to address the specific issue identified.
- c) Corrective actions may include immediate operational changes, reinforcement of procedures, or reassignment of responsibilities.
- d) Preventive actions shall be implemented to ensure that similar complaints do not recur, including revision of procedures, enhancement of training programmes, strengthening of supervision, and improvement of communication systems.
- e) Where the complaint involves misconduct by personnel, the **Human Resource Department** shall oversee the disciplinary process.
- f) Disciplinary actions shall be proportionate to the severity of the offence and shall comply with applicable labour laws and organizational policies.
- g) Actions may range from formal warnings to suspension or termination of employment.
- h) Where individuals have suffered harm, whether physical, financial, or reputational, NEC Security Services (SMC) Limited shall consider appropriate remedial actions, including compensation, apology, or other forms of redress in accordance with contractual obligations and applicable law.
- i) The organization shall also ensure that lessons learned from complaints and grievances are documented and communicated to relevant departments to support continuous improvement of the Security Operations Management System.
- j) All actions taken shall be recorded, monitored, and reviewed to ensure effectiveness.



10. Communication of Outcomes

Complainants shall be informed of the outcome of their complaint, subject to confidentiality and legal restrictions.

Communication shall be clear, respectful, and timely.

Where full disclosure is not possible due to legal or privacy considerations, the organization shall provide appropriate feedback without compromising confidentiality.

11. Records

- a) Complaint Registers
- b) Disciplinary hearings