

 ESMS Manual	ANNEXURE - 24		Document Code: 2
	Document Title: Grievance Redressal Mechanism		Version: 1
			Date:
			Document Owner: Geri Care Health Services Private Limited

1. PURPOSE

Grievance Redressal Mechanism (GRM) is a structured framework outlining procedures and protocols for effectively and efficiently addressing complaints or grievances raised by the relevant stakeholders (both internal and external) associated with the Company and providing adequate support to them. This mechanism aims to ensure that concerns are resolved in a fair, transparent, and timely manner while promoting accountability, strengthening stakeholder trust, and supporting continuous improvement within Geri Care's operations.

2. SCOPE & APPLICABILITY

GRM ensures accessible channels for reporting grievances at all levels, emphasizing confidentiality and collaborative resolution efforts. Rooted in a commitment to a healthy workplace and positive external relations, the mechanism undergoes regular reviews for adaptability and continual improvement, promoting a culture of transparency and accountability. The scope of grievance redressal mechanism is highlighted below:

- ☞ **Comprehensive Framework:** establishes a comprehensive framework designed to address and resolve various concerns, complaints, or grievances within the organization.
- ☞ **Inclusive Scope:** covers grievances across all levels and Centers/facilities, encompassing workplace matters, interpersonal conflicts, policy violations, and any issues affecting the organization's well-being.
- ☞ **Structured Process:** provides clear procedures for reporting, recording, and resolving grievances, ensuring a systematic and organized approach to handling concerns.
- ☞ **Accessibility:** Clear channels are established to facilitate the reporting of grievances, making the mechanism accessible to all stakeholders within the organization.
- ☞ **Confidentiality:** prioritizes confidentiality, safeguarding the privacy of individuals involved in the grievance process to encourage open and honest reporting.
- ☞ **Collaboration:** The Grievance Redressal Officer, Center/Facility heads, and relevant staff collaborate to address and resolve grievances, promoting a collective effort towards resolution.
- ☞ **Transparency and Accountability:** The mechanism aims to foster a transparent and accountable environment, where grievances are handled effectively, contributing to the overall well-being and success of the organization.

The GRM extends to all of Geri Care's internal stakeholders encompassing employees (including doctors, nurses, and support staff, along with contractual employees), as well as external stakeholders such as patients, their families, visitors, service providers/ contractors and other relevant stakeholders associated with the Company.

External Consideration: The scope extends beyond internal matters to address community concerns, recognizing the importance of maintaining a positive external image and addressing broader issues.

3. TYPES OF GRIEVANCES

Geri Care has broadly categorized the grievances as **Internal** and **External Grievances** as outlined in **Table 1**.

Table 1: Types of Grievances

Type of Grievances	Issues/Activities covered as Grievances
Internal Grievances¹	
<i>Employee Grievances</i>	☞ Employee Compensation and other benefits; ☞ Employments and other personnel policies related to HR; ☞ Work Load and Work Distribution; ☞ Work-life balance; ☞ Timely disbursement of remuneration; ☞ Termination of Employment;

¹ Concerns raised by employees engaged by Geri Care, which are generally HR related issues. Complaints related to sexual harassment and discrimination shall be in line with Company's Policy against Sexual harassment (part of Policy on Grievance Redressal). Whistleblower related grievances will be governed by Whistle Blower policy.

	☞ Inadequate working conditions – health, safety and welfare of the employees; ☞ Management – Employee relationship; ☞ Unethical Behavior among co-workers or senior - subordinate employees; ☞ Non-payment of wages or wage discrimination among the labourers; ☞ Discrimination on the basis of gender, caste, creed, language, religion etc.; ☞ Workplace harassment; ☞ Workplace safety, cleanliness, facilities, equipment, or maintenance; ☞ Inadequate training opportunities, lack of professional development, or limited career advancement prospects; ☞ Grievances regarding access to healthcare services, wellness programs, mental health support, or accommodations for disabilities; ☞ Grievances regarding disciplinary actions, performance evaluations, promotion decisions, or other employment-related processes perceived as unfair or biased; ☞ Lack of support from management, or perceived favoritism.
External Grievances²	
<i>Contractors/ Suppliers/Vendors Related Grievance</i>	☞ Breach of Agreement Terms & Conditions; ☞ Employer denying to grant a specific benefit to the contractual workers; ☞ Complaints regarding delays in payment, discrepancies in wages, or non-payment of overtime or other entitlements as per the contract terms; ☞ Unfair distribution of workload, unreasonable work expectations, or inappropriate job assignments beyond the scope of the contract; ☞ Unsafe working conditions, exposure to hazardous operations, or lack of proper safety training; ☞ Inadequate safety measures, lack of proper equipment or tools, unsanitary working conditions, or insufficient break times.
<i>Patient Care Related Grievance</i>	☞ Quality of care; ☞ Complaints about perceived deficiencies in the quality of medical treatment, including misdiagnosis, medication errors or surgical complications; ☞ Grievances regarding inadequate follow-up care, discharge planning, coordination of care between different healthcare providers, or continuity of care after hospital discharge; ☞ Cleanliness of room/ward, comfort, noise levels, or other aspects of the hospital environment that may impact patient comfort or well-being; ☞ Lack of orientation of room/ward and Hospital; ☞ Length of stay; ☞ Clinical competence and attitude of doctors, nurses and other service providers; ☞ Mistreatment and abuse (mental, physical or sexual); ☞ Allegations of unprofessional conduct, rudeness, insensitivity, or lack of empathy displayed by healthcare providers or support staff; ☞ Quality of canteen food; ☞ Loss of belongings; ☞ Concerns regarding ineffective communication between healthcare providers and patients, including unclear explanations of diagnoses or treatment plans, insufficient information about procedures or medications, or difficulty in accessing medical records; ☞ Excessive waiting times for appointments, tests, procedures, or consultations with healthcare providers; ☞ violations of patient rights, confidentiality breaches, informed consent issues, or perceived disregard for cultural or religious beliefs; ☞ Cost of hospital services; ☞ Complaints regarding billing errors, overcharging, insurance disputes, or lack of transparency in healthcare costs; ☞ Concerns about patient safety practices, infection control measures, or incidents of medical errors or adverse events. ☞ Flaws in Consultation Process.
<i>Community Grievance and Other Grievances</i>	☞ Damage/Nuisance due to vehicle movement around hospital premises; ☞ Unethical behaviour of Geri Care employees; ☞ Grievances against contractor or labourers and security personnel deployed at hospital; ☞ Issues concerning public safety risks, such as accidents involving Hospital vehicles or incidents of violence or disorderly conduct near the Hospital premises; ☞ Adverse impact on neighboring environment due to construction/renovation activities at Hospital site such as noise, dust emissions, water logging in low lying areas, etc.;

² Concerns raised by patients, patient's families, investors, contractors, vendors/ suppliers etc., affected by Geri Care's operations or community grievances.

	☞ Adverse impact on neighbouring environment and health and safety of the local community due to random dumping of biomedical waste/ hazardous waste; ☞ Concerns regarding limited parking availability for residents due to Hospital visitors or employees, leading to congestion or inconvenience in the surrounding area; ☞ Issues concerning the Hospital's emergency response capabilities and coordination with local emergency services during crises or natural disasters; ☞ Complaints about the Hospital's contributions to community development initiatives, economic revitalization, or social welfare programs in the area; ☞ Concerns about the impact of the Hospital's presence on property values or the overall desirability of the neighborhood for residents; ☞ Issues raised by community during health care/medical camps, awareness campaigns and other community related activities; ☞ Issues related to investors; and ☞ Social and Environmental issues raised by Non-Government Organizations (NGOs) or other activist groups;
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The above list is non-exhaustive, and is only an illustrative list of grounds under which a complaint and request for an investigation can be made.

4. GRIEVANCE REDRESSAL COMMITTEE (GRC)

GRC is constituted at corporate level, with the overall responsibility of adoption of GRM across Geri Care. The GRC shall be responsible for ensuring that the GRM is implemented in a righteous spirit and there is an appropriate final closure of each grievance received.

The concerned managers/Head of Departments (HODs) engaged with internal/external stakeholders shall form part of the GRC. GRC shall be reconstituted in every two (2) years from the date of its establishment.

Roles and Responsibilities of GRC

- ☞ Review of all grievances along with trends and resolution times, potential for improvement, and action items to take advantage of those opportunities. The committee will get together *every six (6) months* to complete the appropriate evaluations.
- ☞ Provide all necessary assistance to the affected person for the purpose of ensuring full, effective and speedy implementation of GRM with support of respective team.
- ☞ Investigation of the complaints escalated to GRC and ensure speedy disposal of every grievance application - within a reasonable time frame of the receipt of application.
- ☞ To protect the privacy and confidentiality of all parties during the investigation, consistent with and subject to the policy guidelines.
- ☞ The committee shall have the necessary authority, as granted by the senior management of the Company, and resources to discharge its responsibilities and duties, including decision to make recommendations for changes in processes, policies, and other such related actions.
- ☞ The GRC will ensure that workers representatives (as applicable) will be selected from the employees to become part of GRC as and when required.

Roles and Responsibilities of Grievance Redressal Officer (GRO)

The **HR Head** will be designated as the Grievance Redressal Officer (GRO).

- ☞ The GRO is responsible for overseeing the grievance redressal process, ensuring compliance with applicable policies and regulations. Receive complaints and concerns and record them in a database.
- ☞ The GRO will work in coordination with relevant Center heads/Facility head, Unit HR and support staff to address grievances effectively.
- ☞ Resolve grievances appropriately, ensuring fairness and timeliness.
- ☞ Assign unresolved complaints to relevant Center/Facility heads or designated owners.
- ☞ Follow up with assigned owners to ensure timely and fair complaint resolution.
- ☞ Regularly update complaint information in the database for accurate tracking.
- ☞ Review and close complaints as appropriate.
- ☞ Provide information on the grievance mechanism to workers/staffs/visitors.
- ☞ Monitor the implementation of resolutions to ensure effective outcomes.
- ☞ Inform management of received concerns and complaints.
- ☞ Collaborate with operations staff to notify communities of potential concerns.
- ☞ Work with community engagement staff to understand and address community issues.
- ☞ Focus on substance and facts, avoiding speculation or value judgments.
- ☞ Recognize job boundaries and seek help, when necessary, especially in complex situations.

- ☞ Follow the specified grievance mechanism process for consistent responses.
- ☞ Maintain confidentiality if requested by a complainant.

Roles and Responsibilities of Center Heads and Staff

Within the organizational structure, Center heads/facility heads carry the responsibility of promptly addressing grievances specific to their respective Centers/facilities. Staff members are encouraged to report any grievances they may have either directly to their immediate supervisors or to the designated GRO. This streamlined approach ensures that grievances are efficiently handled at the Center level/facility level, promoting a responsive and effective resolution process. Encouraging open communication and direct reporting channels helps create a supportive environment for staff members to address and resolve concerns in a timely manner. Each Center head/facility head is responsible for addressing grievances related to their respective Centers/Facilities promptly. Staff members are encouraged to report grievances to their immediate supervisor, Unit HR or the Grievance Redressal Officer.

5. GRM- INTERNAL GRIEVANCES

1.1. GRM FOR EMPLOYEES

Employees are encouraged to communicate their concerns to Reporting Manager and HR department via different channels, including informal and formal methods such as email, phone, written complaint, or in-person.

Informal Method: Employees must verbally disclose the complaints to the immediate supervisor. The supervisor will actively listen, investigate the issue, and try to find a fair solution. The procedure for registering a formal grievance shall be followed in the event where it is deemed necessary or in situations where the team is unable to settle the issue informally.

Formal Method: Geri Care has developed a formal three-level escalation procedure for internal grievance redressal. The grievant can register his/her complain in the template given in [Appendix A](#). The escalation matrix to resolve the grievances associated with employees is as follows:

Level I: Center Head/Facility Head or Unit HR

The aggrieved employee may submit his grievance in writing to the Center Head/Facility Head concerned or to the HR. Such Nominated Authority will provide the resolution within seven (7) days.

Level II: Grievance Redressal Committee (GRC)

The GRC forms the second level of the escalation matrix which shall investigate the matter and internal resolution shall be figured out and informed to the aggrieved party within 10 days.

Level III: Senior Management

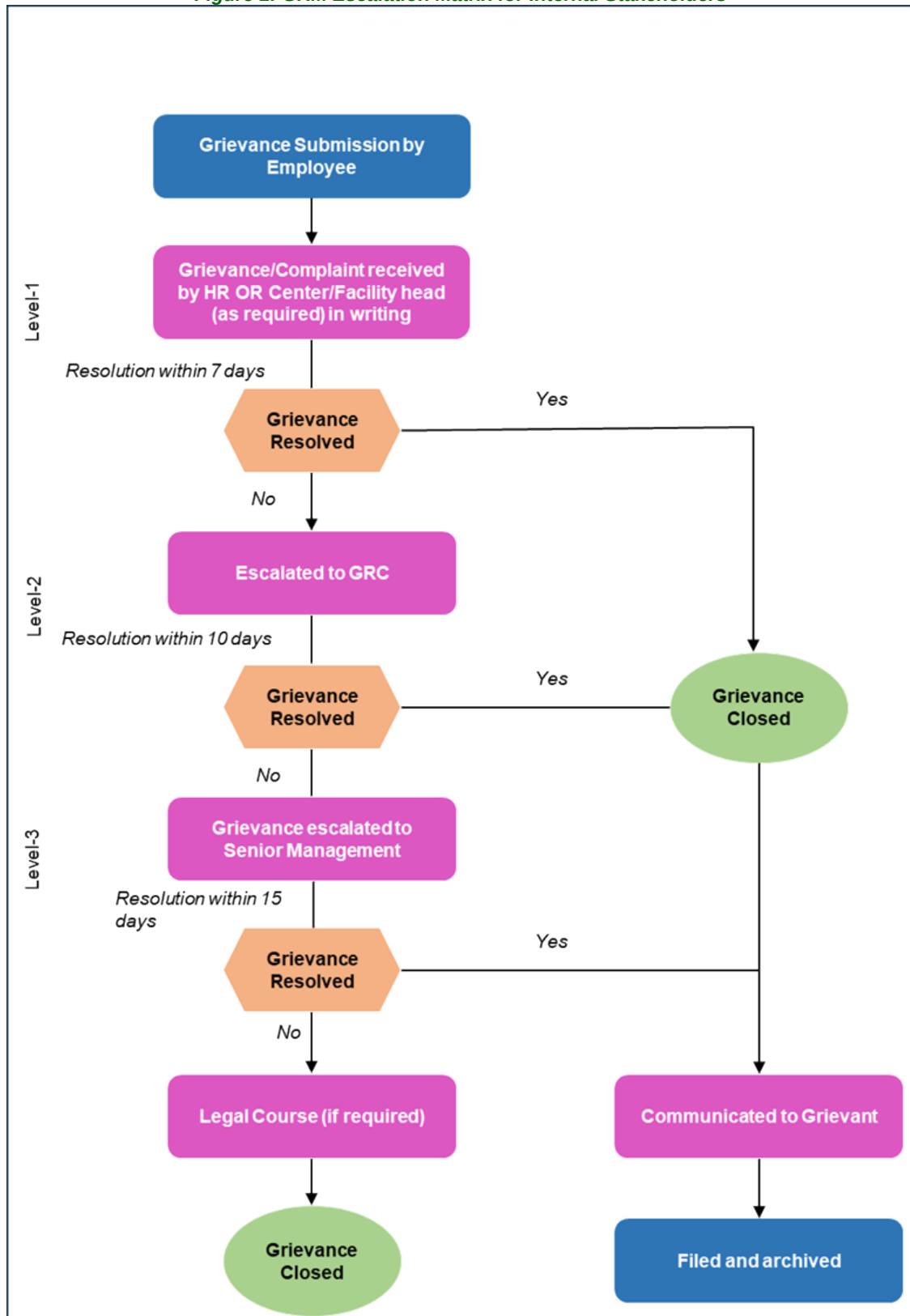
- ☞ When aggrieved party is not satisfied with the Level-II resolution, then he/she can approach to Senior Management for further resolution.
- ☞ On receipt of complaint Senior Management (preferably Medical Director) of the Company will take the action and investigate the matter.
- ☞ In such cases, the senior management would review the above process (Level I and II) and resolve the complaint within 15 days of receipt of the application.

In case grievant is not satisfied with the decision of senior management of Geri Care, he/she can adopt legal course for further resolution of matter (if required).

All the redressal decisions shall be made and submitted in writing to the grievant (keeping a copy with the HR Department).

Figure 1, depicts the escalation matrix for internal stakeholders.

Figure 1: GRM Escalation Matrix for Internal Stakeholders



1.2. GRM FOR CONTRACTUAL WORKERS

In the event of grievances of contractual workers, such as payment of wages, social benefits related issues etc., it will be directly handled by the respective contractors. If worker's grievance falls under purview of Geri Care such as grievance related to working conditions, conflict with company's on-roll employee, etc., it shall

be directly managed by the HR department or further escalated according to Geri Care's internal GRM. The GRC will also have representation from the workers to redress workers grievances fairly and transparently.

1.3. ANONYMOUS COMPLAINT

Suggestion/complaint boxes will be placed at strategic locations within the Hospital to ease written and anonymous complaints submissions. These suggestion/complaint boxes will be read once every week by HR Department. In case of any worker or employee needs to file an anonymous complaint, she/he shall be allowed to do so by not filling any personal details or contact information.

6. GRM- EXTERNAL GRIEVANCE

Maintaining positive relationships with external stakeholders is essential for the sustained success and reputation of any company. While efforts are made to ensure smooth operations and satisfaction of patients, community, etc., grievances may arise from external parties, necessitating a structured approach to address and resolve such concerns. Recognizing the importance of responsiveness and accountability in addressing external grievances, Geri Care has developed a systematic procedure for external grievance redressal as depicted in **Figure 2**.

Level I

1. Registration of Grievance

Verbal Registration: External Stakeholders, including patients, their families, etc., can register grievances by expressing their concerns verbally (directly or from telephone). This method allows for immediate communication and may be suitable for individuals who prefer direct interaction.

Online Grievance Registration: The Hospital's website (<https://www.gericare.in/>) or a dedicated online portal may provide an option for stakeholders to register grievances electronically. This method caters to individuals who prefer the convenience of submitting grievances online.

2. Center Resolution

Level I The HR will investigate the grievance and propose a resolution within *seven (7) working days*. If the complainant is satisfied, the grievance will be considered resolved, and the details will be documented.

Level II

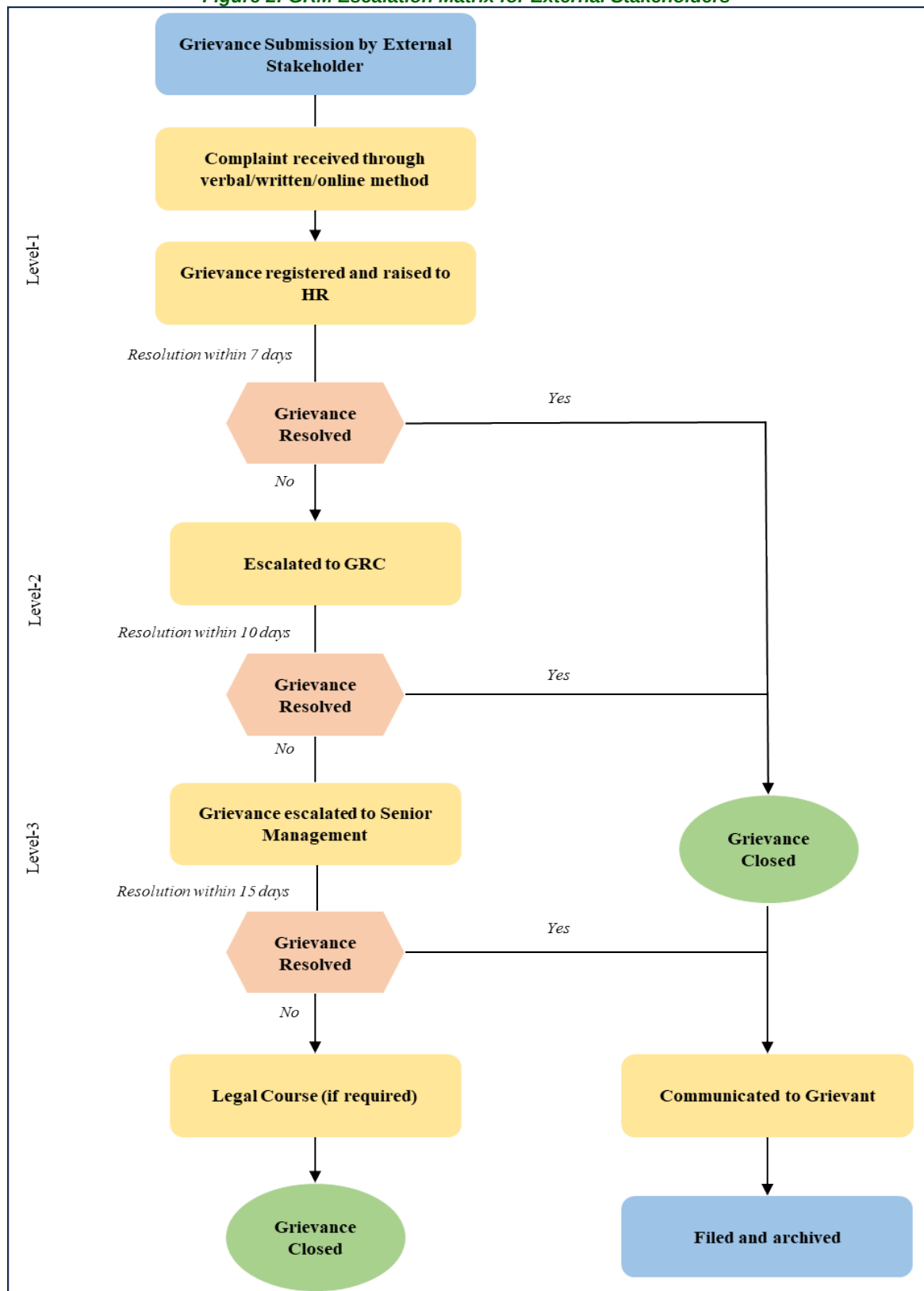
Escalation to GRC: If the grievance is not resolved at the HR level or the complainant is unsatisfied, the matter will be escalated to the GRC. The GRC will conduct an impartial review and propose a resolution *within ten (10) working days*.

Level III

In the event of persistent dissatisfaction from the complainant, the grievance shall be escalated to the board members/senior management and provide resolution in 15 days.

If the Grievant is not satisfied with the resolution of senior management, he/she can approach legal authorities for further action.

Figure 2: GRM Escalation Matrix for External Stakeholders



7. INVESTIGATING GRIEVANCES

☞ If the investigation reveals that submitted complaint is valid, several actions may be taken, depending on the nature of the complaint. The person against whom the complaint is made may be asked to give grievant a written apology; he/she may be given a written warning, counselling, transfer, demotion, or maybe subjected to disciplinary action up to and including termination of employment.

- ☞ If the investigation is inconclusive, i.e., the complaint cannot be proved due to lack of evidence or the conduct is not sufficiently serious to justify disciplinary action, the company may nevertheless take a number of actions. These may include training and/or monitoring of relevant staff.
- ☞ If the complaint is found to have been completely fabricated or raised vexatiously, appropriate action may be taken against grievant, such as counselling, an official formal warning, transfer, demotion, or disciplinary action up to and including termination of employment, depending on the seriousness of the circumstances.

8. MONITORING AND EVALUATION

Periodic review of internal and external grievances will be carried out at the ESMS Committee meetings. The grievance records will be periodically monitored to track the following monitoring indicators identified that can be a part of the monitoring mechanism:

- ☞ Counting the number of complaints that have been filed and resolved.
- ☞ Utilize complaints to examine structural flaws in addition to considering each complaint and evaluating its efficacy and efficiency.
- ☞ Identify trends in the complaints received by the Company and the ways in which they are handled.
- ☞ The typical amount of time required to resolve complaints falling into a specific category.
- ☞ Whether any issues require legal scrutiny or have a significant impact on corporate policies.
- ☞ Transparency and cultural appropriateness concerns.

Consult all categories of pertinent external stakeholders regarding the grievance system in cases of external grievances, and take into account any comments received during consultations while designing, implementing, managing, and overseeing the grievance mechanism.

9. RECORDKEEPING

To keep track of the grievances received, the respective teams ensure that all internal and external grievances will be recorded in a tabular format as per **Appendix B (Form for Maintaining Grievance Log and Monthly Reporting Form)**. This will reduce the risk of leaving any issues open and for identifying opportunities for improvement. The structure of the grievance register shall be as follows.

10. CONFIDENTIALITY

Geri Care shall make provision for lodging of anonymous complaints, and where a complaint is not made anonymously, Company shall ensure all details of a complainant and other persons involved in and/or assisting in an investigation, will be kept confidential to the extent permitted by law and Company policy. The complainant won't receive any unfair treatment, and the company won't use victimization, harassment, discrimination, or any other unfair employment practices against them.

Note: The protections extended under the GRM shall only apply to complainants who have made a complaint in good faith. Where it is discovered that a complaint has been made in bad faith, with full knowledge that such complaint is false or baseless, Geri care reserves the right to initiate disciplinary action against such complainants.

11. REVIEW

Continuous improvement is emphasized through regular reviews and updates to the grievance redressal process, ensuring alignment with evolving organizational needs and standards and if there are any amendments in the legal/statutory requirements at regional and/or National level.

GRO/HR Head along with Unit HR of Geri Care is responsible for implementing and reviewing this plan. It shall be reviewed quarterly or before that, as required.

12. AMENDMENTS IN GRIEVANCE REDRESSAL MECHANISM

The latest versions of the Documentation Format must be used at all times. This page needs to be updated whenever there is a change in the version number of the documents.

S. No.	Date	Version	Details of Amendments

APPENDIX A

INTERNAL GRIEVANCE FORM

Date	
Employee Name	
Facility	
Center	
Designation	
Employment Type (on roll/contractual)	
Contact details Phone Email	
Immediate Reporting Manager/ HR	
Date of discussion with Immediate Reporting Manager/HR	
Grievance submitted to	

Reason for grievance (Please give full details of the grievance, including dates, incidents, parties involved, witnesses, circumstances, documents etc.)

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Kindly list the names and designations of all individuals involved in the grievance.

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Document or Evidence (if available)

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Have you previously raised concerns about this or a similar incident?	☐ YES ☐ NO	If yes, please mention the previous incident	
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Please describe any solutions you believe can help resolve your complaint:

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Please provide any additional feedback or comments you wish the company to consider when investigating your complaint:

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☐ <i>I declare that the facts set forth in this complaint form are true and accurate pursuant to the penalty of perjury under the laws of this State.</i>	
Employee Signature:	Date:

GRIEVANCE REDRESSAL RESPONSE		
Date of Redresses:		
Date of Follow Ups (If Any):		
Decision of GRC (give full details): <i>Please provide details of proposed/executed action plan.</i>		
Whether complainant accepts the outcome:	☐ Accepted	☐ Not accepted
Signature of GRC Representative:		

APPENDIX B

FORM FOR MAINTAINING GRIEVANCE LOG

S.No.	Date	Particular of Complainant			Particular of Grievances			
		Name	Address	Contact No.	Subject of the Grievance	Department	Brief Description	Date of Redress

MONTHLY REPORTING FORM

S.No.	Location	Complainant's Name	Address	Grievance	Approach Adopted	Redressal Grievance	Root Cause	Date Redressal	Status/ Outcome