



# **GB National Development Squad 2020 Information Pack Parents and Carers and Loco Parentis**

*This policy may be amended by the BMC at its absolute discretion at any time. This policy should be read together with your athlete agreement and your obligations of confidentiality that are contained therein.*

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## INTRODUCTION

The British Mountaineering Council (BMC) is the national governing body in respect of competition climbing. Competition climbing is the sport of climbing in all its various forms and disciplines including lead, bouldering and speed, which takes place on purpose-built climbing walls (the sport).

The BMC is establishing a new department to manage and operate all aspects of the sport. The department will operate under the name GB Climbing. The department will be overseen by a sub-committee of the BMC Board of Directors – the Competition Climbing Performance Group (CCPG).

This document consists of various codes and policies to enable parents/carers/loco parentis to support their child. Any reference to 'you', 'your' or 'yourself' is to a parent/carer/loco parentis.

**Please note that if you are representing the BMC as a Team Official or a Coach, you cannot act as loco parentis whilst in this role.**

The following policies and procedures are set out in this document:

Code of Conduct (A)

Breach of Code of Conduct/Complaint Against You (B)

Whistleblowing Policy (C)

Complaints Procedure (D)

## A. CODE OF CONDUCT

### 1. General

- 1.1. As a responsible parent/carer/loco parentis you will
  - 1.1.1. respect the rights, dignity and worth of every athlete, coach, technical official and others involved in climbing and treat everyone equally;
  - 1.1.2. uphold the values of sportsmanship;
  - 1.1.3. cooperate fully with others involved in the sport such as coaches, technical officials, team managers, doctors, physiotherapists, sport scientists and representatives of the national governing body;
  - 1.1.4. only repeat or disclose non-confidential personal or professional information about athletes or coaches to other people that has a) come from an official source such as the BMC or the coaching team, or b) that is already in the public domain. It is not appropriate to disclose any

other types of information (unsubstantiated claims or rumours, personal, or professional) to anyone else including coaches, athletes, or the wider community. Failure to follow this can damage morale, the reputation of the BMC, the GB Climbing Team, coaches and athletes, and creates an unprofessional, hostile environment;

- 1.1.5. consistently promote positive aspects of the sport such as fair play and never condone rule violations or the use of prohibited or age-inappropriate substances; and
- 1.1.6. anticipate and be responsible for your own child's needs including being organised, ensuring they have the appropriate equipment, and being punctual.

## **2. Behaviour and actions at training sessions, meets, events and competitions**

### **2.1. Behaviour**

As a responsible parent/carer/loco parentis you will:

- 2.1.1. act with dignity and display courtesy and good manners towards others,
- 2.1.2. treat athletes, coaches, officials and others with respect and consideration,
- 2.1.3. avoid swearing, abusive language, irresponsible behaviour (including behaviour that is dangerous to yourself or others), acts of violence, bullying, harassment and physical and sexual abuse,
- 2.1.4. challenge inappropriate behaviour and language by others,
- 2.1.5. never engage in any inappropriate or illegal behaviour,
- 2.1.6. avoid destructive behaviour and leave climbing and other venues as you find them,
- 2.1.7. not carry alcohol, nor consume it to excess and not carry or consume illegal substances,
- 2.1.8. avoid carrying any items that could be dangerous to yourself or others excluding climbing equipment used in the course of your child's climbing activity,
- 2.1.9. not make inappropriate references, criticism or derogatory remarks about BMC employees, athletes or other people connected to the BMC and GB Climbing including any connected third parties or other individual(s) associated with the BMC and GB Climbing,
- 2.1.10. not criticise or make fun of officials, competitors or any other individuals or bodies connected with the sport,
- 2.1.11. not make comments or jokes which could be offensive to protected groups or communities. This includes content relating to the following: gender (including transgender), race or ethnicity, religions and beliefs (including lack of belief), sexuality, disability, and other conditions.

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You should be vigilant regarding the areas listed above, and report any suspicions of behaviour in breach of the areas listed above to the Competitions Program Manager – [zoe@thebmc.co.uk](mailto:zoe@thebmc.co.uk)

## **2.2. Actions**

As a responsible parent/carer/loco parentis you will:

- 2.2.1. ensure your child arrives on time and they are dressed in team uniform,
- 2.2.2. ensure your child attends all training events, unless absence is previously agreed with the event organiser,
- 2.2.3. immediately alert coaches to any injuries that may occur to your child (however mild),
- 2.2.4. notify an event organiser if you have to go somewhere and when you will return,
- 2.2.5. be open to feedback and constructive criticism of your child, and understand that this is delivered in the spirit of improvement and development,
- 2.2.6. not respond if someone seeks private information unrelated to climbing such as personal information, home life information,
- 2.2.7. never allow your child to accept lifts in cars or invitations into homes without your prior knowledge and consent,
- 2.2.8. use safe transport or travel arrangements,
- 2.2.9. report any accidental injury, distress, misunderstanding or misinterpretation to event organisers as soon as possible,
- 2.2.10. report any suspected misconduct by coaches or other people to the BMC as per the Grievance Policy below.

## **2.3. International Competitions**

In addition to the above, if you are attending any international competitions as a responsible parent/carer/loco parentis you will behave in a way that upholds respect for the BMC, Mountaineering Scotland and the GB Climbing Teams.

## **2.4. During Qualifications and Finals**

In addition to the above, if you are attending any qualification events or finals, as a responsible parent/carer/loco parentis you will:

- 2.4.1. remember that your child is part of a national team, and understand that the coaches are striving to divide their time equally between all athletes. Your child is therefore encouraged to take

responsibility for their performance and approach the coaching team for assistance if they feel they aren't getting what they need or expect,

2.4.2. support other team members wherever possible when your child is not competing.

## **2.5. During 'Downtime'** (i.e. when no competition related activity is taking place)

In addition to the above, as a responsible parent/carer/loco parentis you will ensure your child is aware of the itinerary for all competition related activities and that they are ready for departure in good time, with all necessary equipment packed and ready.

## **2.6. Selection Events**

In addition to the above as a responsible parent/carer/loco parentis you will:

2.6.1. follow the selection criteria and rules of the selection event as published by the BMC, and

2.6.2. recognise that selection events closely resemble the dynamic and fast paced experience of the international competition environment. You should therefore consider if such environment is conducive to your child's wellbeing.

## **2.7. Other Events** (such as outreach, fundraising, social events and any other official GB Climbing meetings)

In addition to the above code of conduct points at [] to [] above, as a responsible parent/carer/loco parentis you will represent the BMC/GB Climbing in a professional and friendly manner.

## **3. Social Media**

3.1. As a responsible parent/carer/loco parentis you are encouraged to embrace and respect the power and opportunity which social media offers. This policy is designed to help you protect yourselves, your child, the sport and the BMC when you are using social media in respect of your child's participation in the sport.

3.2. Social media means any means of personal online communication. Social media is constantly evolving and this policy or guidance covers well-established digital communication applications, as well as new ones, which may arise in future.

3.3. When you or your child chooses to use social media you're acting as a public ambassador of the sport/BMC and you are responsible for your own reputation, the reputation of your child and the

reputation of the sport. We've created these social media guidelines to help you understand your responsibilities and look after yourself, your child, the sport and the BMC when you are using social media in respect of your child's participation in the sport.

- 3.4. As a responsible parent/carer/loco parentis please ensure that when either yourself or your child posts anything to social media in connection with the sport that the posts:
  - 3.4.1. do not contain confidential and/or commercially sensitive information relating to the GB Climbing or the BMC. Confidential information can include: contractual or financial information, images, videos or information taken exclusively, commercially sensitive information relating to sponsors or other partners, internal communications and communications.
  - 3.4.2. respect the rights and privacy of others. Images, videos or information which reveal private moments, or private information about other persons within the BMC and the GB Climbing must not be posted on social media.
  - 3.4.3. do not bring the sport, the GB Climbing or the BMC into disrepute. This includes inappropriate references, criticism or derogatory remarks about BMC employees, athletes or other people connected to the GB Climbing, the BMC, Mountaineering Scotland, or any connected third parties or other individual(s) associated with the GB Climbing, the BMC and Mountaineering Scotland.
  - 3.4.4. do not criticise or make fun of officials, competitors or any other individuals or bodies connected with the sport.
  - 3.4.5. do treat everyone you or your child interacts with online with respect
  - 3.4.6. do not contain comments, videos or photographs which are likely to upset, offend or otherwise cause harm to others
  - 3.4.7. do not contain comments or jokes or any content which could be offensive. This includes content relating to, gender, including transgender, race or ethnicity, religions and beliefs, including lack of belief, sexuality, disability and other conditions
  - 3.4.8. unless otherwise expressly agreed in advance with the BMC do not express personal opinions on controversial matters such as politics on any account which is designed solely for the purpose of promoting the sport and GB Climbing.
- 3.5. Please be aware that in a social media environment there will be different sensitivities and life views. Content which isn't intended to be offensive can cause distress or offence to others.
- 3.6. Online abuse will not be tolerated. If any form of abuse is received online the BMC recommend not responding to the abuser but instead you seek the help and support of the BMC. A screenshot should be taken of any abuse received and then reported to the BMC Safeguarding Officer.

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- 3.7. Please be aware that there are many third-party programmes and other ways that can download your material without the individual knowing.

#### **4. Anti-competition, Fixing and Gambling**

- 4.1. As a responsible parent/carer or loco parentis you must:
- 4.1.1. never bet on the outcome of a competition. If betting has occurred the BMC must be informed.
  - 4.1.2. never instruct, encourage or facilitate any other party to bet on sports your child is participating in.
  - 4.1.3. never ensure the occurrence of a particular incident, which is the subject of a bet and for which you expect to receive or have received any reward, and never give or receive any gift, payment or other benefit in circumstances that might reasonably be expected to bring the BMC or the GB Climbing Teams into disrepute.
  - 4.1.4. never share sensitive information you have access to that is not available to the public, such as knowing that a competitor is injured. This is considered sensitive, privileged or inside information. This information could be sought by people who would then use that knowledge to secure an unfair advantage to make a financial gain.
  - 4.1.5. not make any attempt to adversely influence the natural course of an event or competition, or part of an event or competition.
  - 4.1.6. not let yourself be manipulated— unscrupulous individuals might try to develop a relationship with you built on favours or fears that they will then try to exploit for their benefit in possibly fixing an event.
  - 4.1.7. inform the BMC if you are approached, or if you hear something suspicious or if anyone approaches you to ask about fixing any part of a competition. Any threats or suspicions of corrupt behaviour should always be Competitions Program Manager – [zoe@thebmc.co.uk](mailto:zoe@thebmc.co.uk)

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## **B. Breach of Code of Conduct/Complaints Against You**

### **1. Introduction**

- 1.1. The BMC wishes to ensure high standards from parents/carers/loco parentis. This policy enables the BMC to take appropriate action against you if a complaint is received about you or the Code of Conduct above is breached (together referred to as a Complaint).
- 1.2. This policy and procedure set out how the BMC will deal with any Complaint.
- 1.3. If the Complaint relates to a parent/carer/loco parentis who is an adult at risk<sup>1</sup> the designated safeguarding lead must be informed at the start. Matters that might be criminal, legal/safeguarding advice must be taken and the matter referred to the statutory authorities before proceeding further.

### **2. Purpose and Scope**

- 2.1. The purpose of this policy is to ensure consistent and fair treatment of parents/carers/loco parentis if there is a Complaint and to encourage appropriate standards of conduct. All persons this policy applies to should have a good understanding of these procedures.
- 2.2. This policy does not confer contractual rights on individuals and will be reviewed in line with any legislative changes. The policy may be changed or amended at the BMC's sole discretion.
- 2.3. The BMC may at its discretion appoint external parties to conduct investigations and Complaint hearings. This may be because of: conflicts of interest; availability of resources; complexity; or specialist knowledge of the issues. The BMC's discretion is not limited by these examples.

### **3. Principles**

- 3.1. The principles governing the policy and its application are:
  - 3.1.1. Any Complaint will be fully investigated and no sanctions will be imposed until parties have been informed of the nature of the Complaint and, if the Complaint is deemed serious, given the opportunity to make representations at a formal meeting.
  - 3.1.2. Parties will always have the right to be accompanied by another adult at any formal or appeal meeting (a companion).
  - 3.1.3. Whilst the BMC will make all reasonable efforts to ensure that parties are present at any disciplinary hearing, in case of absence exceeding seven days then the BMC may hold the hearing in the party's absence, in which case the party may make written representations.
  - 3.1.4. Wherever possible the BMC will use its best endeavours to keep all details relating to any Complaint investigation or procedure confidential.

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<sup>1</sup> A party who has needs for care and support; and is experiencing, or is at risk of, abuse or neglect; and because of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect

3.1.5. The BMC processes personal data collected during the investigation stage and any subsequent sanctions in accordance with its Data Protection Policy. Data collected as part of the investigation and subsequent sanctions is held securely and accessed by, and disclosed to, individuals only for the purposes of completing the disciplinary procedure. Inappropriate access or disclosure of such data constitutes a data breach and should be immediately reported in accordance with the BMC's Data Protection Policy. It may also constitute a Complaint, which will be dealt with under this policy.

#### **4. Serious Breach of the Code of Conduct/Serious Complaint**

- 4.1. Serious breaches of the Code of Conduct will be considered on a case by case basis.
- 4.2. The following is a non-exhaustive list of examples of behaviour that if reported to the BMC, the BMC will regard as being a serious complaint:
  - 4.2.1. the use of physical violence including fighting and assault on another person
  - 4.2.2. deliberate damage to BMC property or property belonging to any other party
  - 4.2.3. incapacity through alcohol
  - 4.2.4. the abuse of illegal substances
  - 4.2.5. discrimination, harassment or victimisation related to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation
  - 4.2.6. sexual harassment or sexual misconduct
  - 4.2.7. the use of verbal abuse or harassment of BMC and GB Climbing staff members.

#### **5. Informal Procedure**

- 5.1. If the Complaint is not deemed serious, the following informal resolution procedure will be followed:
  - 5.1.1. the Competitions Program Manager will discuss the matter with all parties involved within 3 weeks of the Complaint being received, notes will be taken of the discussions and held on a file for a period of 12 months;
  - 5.1.2. the Competitions Program Manager will then decide upon the appropriate course of action;
  - 5.1.3. the Competitions Program Manager will then email all those involved with the outcome and any actions they are required to undertake

#### **6. Formal Procedure**

- 6.1. If there has been a serious Complaint, or you have within the preceding 12 months been the subject of an informal Complaint, the following procedure will be followed.
  - 6.1.1. the Head of the GB Climbing Department will investigate the Complaint by interviewing the parties involved, and if necessary, obtaining witness statements from any witnesses within 3 weeks of the Complaint.

- 6.1.2. the Head of the GB Climbing Department will then call a formal meeting with you to discuss the Complaint. You will have the right to be accompanied by another adult at this meeting (a companion).
- 6.1.3. 5 working days from the date of the meeting above, the Head of the GB Climbing Department will write to you setting out their findings and the action to be taken by the BMC.

## **7. The Right to Appeal**

- 7.1. If you disagree with the outcome of the informal or formal procedure you have the right to appeal against the decision.
- 7.2. The appeal must be made within 21 days of the outcome and be in writing to the BMC.
- 7.3. The BMC will review the original investigation and investigate any new evidence provided.
- 7.4. The BMC will prepare a report showing the findings of their review and inform you of their decision as to the course of action to be taken. The possible courses of action are: to confirm the original decision, revoke the original decision, amend the original sanction, substitute a different sanction.
- 7.5. The BMC's decision is final and marks the end of the appeal process.

## **8. Sanctions**

- 8.1. Relevant sanctions may be applied on a case by case basis.

## **9. Criminal Offences**

- 9.1. Where allegations are made that may be of a criminal nature the BMC will co-operate fully with any police investigations. Where these issues are related to your potential conduct whilst overseas, it should be noted that the legal jurisdiction of England and Wales does not cover overseas training events and competitions and will, therefore, be subject to the legislation and legal proceedings of the country in which the alleged offence occurred.

## **10. Confidentiality**

- 10.1. You should only discuss Complaint matters with the BMC staff involved in the process and your companion. Breaching confidentiality may result in further sanctions being applied.
- 10.2. The outcome of a Complaint will remain confidential to the parties involved. Disclosure may be made in accordance with the BMC's legal, contractual or regulatory obligations.

## **11. Time limits**

- 11.1. In cases where it is not practical to implement the procedure fully and expeditiously, for example in the absence of the relevant BMC staff, the Complaint will be dealt with as closely as possible in accordance with this procedure.
- 11.2. Under normal circumstances the Complaint process should be concluded in no more than 2 months. However, it is recognised that more complex cases could take up to 6 months. When any Complaint process takes more than 30 working days, the BMC staff conducting the process shall provide a written update to all parties at the 30 working day point, and every 30 working days thereafter until the process is concluded.

## **12. Note taking and records**

- 12.1. Should an investigation lead to a criminal investigation, all material obtained in the course of an investigation should be considered relevant and be made available to the police and, where applicable, to the party involved.
- 12.2. The BMC will not make an audio recording of any investigations or meetings. You are not permitted to record disciplinary interviews, meetings or hearings without prior consent from the BMC.
- 12.3. The BMC requires 'meeting notes' to be taken at all meetings to record decisions and outcomes. All interviews must have a written record, signed by the interviewer and yourself. The interview record must only contain first party evidence and not hearsay or speculation.
- 12.4. You will be sent a copy of the interview or meeting notes produced, which will constitute the BMC's record of proceedings.
- 12.5. All records detailing the nature of any sort of misconduct, your defence or mitigation, the action taken and the reasons for it, whether an appeal was lodged, its outcome and any subsequent developments, will be kept confidentially by GB Climbing. Likewise, the BMC may also keep records relating to your conduct, the implementation of corrective actions and progression of learning.
- 12.6. First party evidence is evidence that the individual saw or heard. Hearsay is evidence that the individual was told by another party or overheard.

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## C. WHISTLEBLOWING POLICY

### 1. Introduction

- 1.1. As a valued parent/carer/loco parentis you are part of the BMC, which encourages a free and open culture and recognises that effective and honest communication is essential if malpractice is to be effectively dealt with and GB Climbing's success ensured.
- 1.2. By using the whistleblowing policy - which supports people who raise a serious concern - you help your child and others have a great climbing experience, by making sure we uphold the law, our policies, values and codes of conduct.
- 1.3. Don't be worried about telling someone. Our whistleblowing policy makes sure that you will be listened to with respect, and taken seriously. We will take all reasonable steps to treat what you say confidentially. So if you have a serious concern please tell us, don't ignore it.
- 1.4. Please note if you have a complaint about the BMC, or a safeguarding issue, then you should use the grievance procedure below.

### 2. Wrongdoing

- 2.1. The Public Interest Disclosure Act 1998 sets out how whistleblowers are to be protected, it does not cover volunteers, but this policy does and it allows you to speak out if you find a serious concern within the BMC without fear of reprisal or detriment to you or your child.
- 2.2. The disclosure made must be about a serious concern. This means you have information and reasonably believe that one or more of the following matters is happening, has taken place, or is likely to happen in the future:
  - 2.2.1. a criminal offence,
  - 2.2.2. the breach of a legal obligation,
  - 2.2.3. a miscarriage of justice,
  - 2.2.4. a danger to the health and safety of an individual,
  - 2.2.5. damage to the environment,
  - 2.2.6. the deliberate concealment of information showing any of the above.

### 3. Procedure

- 3.1. If you become aware of any criminal offence or other wrongdoing and you believe it to be in the public interest, you should report it immediately as set out below.
- 3.2. The information you provide must be given to us in good faith. This means that you must believe it to be substantially true and you must not act maliciously or make false allegations or seek any personal gain for yourself, or your child.

- 3.3. Upon becoming aware of a wrongdoing, raise your concerns immediately with the Competitions Program Manager ([zoe@thebmc.co.uk](mailto:zoe@thebmc.co.uk)) Please state clearly that you are making a protected disclosure under this policy, and provide the following information
  - 3.3.1. the name of the BMC/GB Climbing staff member/person/contractor/volunteer your concern relates to,
  - 3.3.2. your own name and role,
  - 3.3.3. your concern,
  - 3.3.4. if anyone else knows about the concern,
  - 3.3.5. what impact your concern has on the BMC/GB Climbing,
  - 3.3.6. if you have previously followed the BMC's grievance procedure set out below and if so what the outcome was,
  - 3.3.7. if you have contacted any other organisations e.g. the police, the Health & Safety Executive,
  - 3.3.8. if you give us permission to reveal your identity to the CEO and other BMC directors.
- 3.4. If the concern raised involves the CEO, please contact the Chair of the GB Climbing CCPG.
- 3.5. The BMC will acknowledge your concern within 10 working days.
- 3.6. The BMC will determine if the whistleblowing policy applies or explain if it should be dealt with in line with other policies e.g. grievance or safeguarding.
- 3.7. If this policy applies, the BMC will investigate the matter and they will talk with you asking you to explain the concern in your own words.
- 3.8. The BMC may use the help of people outside of the BMC if appropriate (e.g. in cases where there is a suspicion of criminal activity. They will keep you informed of progress as much as possible depending on the levels of confidentiality required.
- 3.9. They will report findings to the CEO. If there is a case to answer, the CEO will take any necessary action including, if appropriate, reporting the matter to the relevant external authority. Where, because of the nature of the serious concern, it is necessary to take disciplinary action against a member of staff, this will be done in accordance with the BMC's internal disciplinary procedure.
- 3.10. The BMC will inform you of the outcome of the investigation and any actions taken as a result. This information is to be treated confidentially.
- 3.11. If there is no case to answer, the BMC will inform you, and if you have not acted maliciously and had a genuine concern, no further action will be taken.

#### 4. Appeal

- 4.1. The BMC will address your concerns fairly, but we cannot guarantee the outcome of our investigations will be the one you want. If you are not happy with how your concern has been handled you should contact the CEO who will review whether appropriate steps have been actioned.

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## 5. Time limits

- 5.1. In cases where it is not practical to implement the procedure fully and expeditiously, for example in the absence of the relevant BMC staff, the investigation will be dealt with as closely as possible in accordance with this procedure.

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## **D. Grievance Policy and Procedure**

### **1. Introduction**

- 1.1. The BMC takes your grievances seriously and encourages you to raise your concerns at an early stage so that they may be resolved fairly and swiftly. In many cases, it will be possible to resolve such issues informally. However, if you wish to raise a grievance on a more formal basis the formal procedure will be followed.
- 1.2. These procedures have been designed to deal with most concerns that you may have with the BMC, GB Climbing and any of their staff or volunteers.
- 1.3. This policy does not include appeals against selection decisions, competition/games decisions and/or results; or anti-doping issues.

### **2. Informal Procedure**

- 2.1. You should inform the Competitions Program Manager as soon as you are able with details of your grievance. This can be either over the phone or by way of email.
- 2.2. If your grievance is about a person, the Competitions Program Manager will speak to that person.
- 2.3. If your grievance is not about a person the Competitions Program Manager will talk to you and their line manager about possible solutions.
- 2.4. Once the above conversations have taken place, the Competitions Program manager will inform you of the outcome and of any action taken in order to resolve the matter.

### **3. Formal Procedure**

- 3.1. The Competitions Program Manager is able to decide if your grievance should be dealt with formally. You may also request the matter to be dealt with formally, to do this you must set out your grievance in writing.
- 3.2. The Competitions Program Manager officer will arrange a formal meeting to take place between you and the Head of GB Climbing to discuss the complaint within 10 working days. You have the right to be accompanied by another adult at this meeting (a companion).
- 3.3. The Head of the BMC GB Climbing Department will write to you with their response to your grievance within five working days of the meeting. If you are not satisfied that the matter has been adequately resolved, or if the BMC fails to deal with your written grievance, then the right of appeal stage of the procedure will apply.

### **4. Appeal**

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- 4.1. If you feel that your grievance has not been resolved, you may appeal, by writing to the chair of the BMC GB Climbing Department CCPG. The CEO will arrange a formal meeting to hear the appeal. You have the right to a companion at this meeting. The meeting will be held within five working days of the CEO receiving your appeal. The CEO will write to the party within five working days of the meeting with their response to your appeal. If it is not possible to contact the party with a response within that time, the party will be given an explanation for the delay and will be informed when a response can be expected. Any decision of the CEO is final.

## 5. Confidentiality

- 5.1. Please note that any grievance raised will be received in absolute confidence and the BMC will, as far as possible, keep any details or your complaint confidential, except where your grievance leads to disciplinary action against another party within the BMC and /or GB Climbing Teams. The BMC will promptly investigate and deal with any grievance brought to its attention. If the grievance concerns the Head of GB Climbing you party should raise your grievance in writing to the CEO.
- 5.2. It is recommended that where appropriate, should any serious grievances and/or grievance appeals be received, consideration should be given as to whether or not the investigation is conducted by an independent investigator to prevent any conflict of interest.