

The Overview Effect – Grievance Mechanism & Whistleblower Policy

Effective date: November 2025

Applies to: All stakeholders

1. Purpose & Scope

The Overview Effect (“TOE”) is committed to ethical behaviour, transparency, and responsible practices in its operations. As a small organisation we emphasise **direct, respectful communication, fair processes, and confidentiality**.

This policy provides a simple, accessible mechanism for internal and external stakeholders— including employees, clients, contractors, suppliers and partners – to raise concerns safely and without fear of retaliation.

2. How to Submit a Grievance

TOE provides open, easy-to-use channels:

- **Online submission form (NL/EN/DE):** <https://theovervieweffect.nl/complaints/>
- **Email:** complaints@theovervieweffect.nl
- **Anonymous reporting** is permitted via the form or email.

Submissions may be in **Dutch, German or English**.

For efficient review, stakeholders are encouraged to include: a description of the issue, relevant dates and context, involved parties, and any supporting information.

3. Information Provided to Stakeholders Who Raise a Grievance

When a grievance is received, TOE sends an acknowledgement and includes the information from this process/policy.

4. Grievance Acceptance process

A grievance will generally be accepted if it:

1. Relates to TOE’s work, conduct, staff, contractors, or internal operations;
2. Addresses potential harm, misconduct, unethical behaviour, environmental or social impact, compliance concerns, or poor-quality services;
3. Provides enough information for initial review.

A grievance may not be accepted if:

- It is unrelated to TOE;
- Submitted in bad faith (harassing or malicious);
- A contractual matter better handled through formal contract dispute processes;
- Lacks sufficient information after attempted clarification.

If not accepted, TOE provides a clear explanation and alternative pathways where appropriate.

5. Grievance Process & Timelines

TOE's size enables **efficient, personable, and transparent handling** of concerns.

Step 1 — Receipt & Logging

- Grievance is recorded in a secure internal register.
- Initial screening for urgency, risk, and confidentiality.

Step 2 — Acknowledgement & Initial Assessment

- Sender receives confirmation, the process explanation, and any clarifying questions.
- Determination of acceptance.

Step 3 — Review / Investigation

Handled by co-founder or, if conflict exists, by:

- A second co-founder; or
- An external/internal confidential counsellor

Investigation involves reviewing evidence, discussing with involved stakeholders, and documenting findings.

Step 4 — Proposed Resolution

TOE presents findings and proposed actions.

Step 5 — Implementation & Follow-up

Actions—including training, corrections, mediation, or service adjustments—are completed.

Step 6 — Closure

Closure confirmation is shared and logged, including any lessons learned.

Appeal

A reconsideration request may be made within **10 business days**.

It is expected that the full process will be done within 8 weeks. TOE will provide updates at key stages. All mentioned timelines might be subject to delay due to e.g., holidays, staff availability.

6. Taking measures

Insofar as an investigation into a suspicion of misconduct leads to the finding of misconduct, measures will be taken to neutralize and (structurally) resolve the misconduct, including taking disciplinary measures or legal proceedings against the person involved.

7. Whistleblower Protection

TOE adheres to the **EU Whistleblower Protection Directive**.

7.1 Commitment to Protect Whistleblowers (4.1)

No employee, contractor, client, or partner will suffer retaliation for raising a concern in good faith. Retaliation includes: demotion, exclusion from work opportunities, verbal or written intimidation, negative performance actions, or harm to professional reputation.

7.2 Consequences for Retaliation (4.2)

Confirmed retaliation may result in:

- Immediate disciplinary action
- Contract termination (for vendors/contractors)
- Leadership review or removal from line-management duties
- Reporting to external authorities if legally required

7.3 Protection Mechanisms (4.3)

- **Anonymous reporting** and limited internal disclosure
 - **Strict confidentiality** (identity shared only when absolutely necessary)
 - **GDPR-compliant storage**
 - **Retaliation risk assessment** at intake
 - **Option to escalate to an independent external reviewer** if the concern involves senior staff
 - **Flexible communication preferences** (language, channel, timing)
 - **Separation of individuals involved in the grievance from decision-making processes**
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8. Review

This policy and grievance mechanism will be reviewed at least bi-annually and adapted if needed.