

Regulatory & Compliance Reference Notes

Compiled by: HRIS Administrator, HR Systems — Northbridge Advisory Partners Date: Current policy review cycle Classification: Internal Confidential Purpose: Reference pack for HR10 policy update review — covers employment standards, grievance handling, pay equity, and performance management obligations

Note from the HRIS Administrator

These notes are compiled from our internal compliance library, regulator guidance summaries, and external advisory briefings received across recent compliance intake cycles. Some references are paraphrased from source documents rather than verbatim. I have flagged areas where our internal records may be incomplete or where I could not confirm whether a requirement is mandatory or recommended.

Where a reference includes "(unconfirmed)", this means I could not locate the primary source document in our compliance library and the requirement should be validated before relying on it for policy changes.

1. Grievance Handling

1.1 Acknowledgement & Response Timelines

- Employer must acknowledge a formal grievance in writing within 5 working days of receipt.
- Investigation and formal response should be completed within a reasonable timeframe. Industry guidance suggests 15-20 working days, but no statutory maximum is defined.
- If the investigation will exceed the stated timeline, the employer should notify the employee in writing and provide an estimated completion date. (unconfirmed — this may be best practice rather than a legal requirement)

1.2 Right to Be Accompanied

- Employees have the right to be accompanied at a formal grievance hearing by a colleague or trade union representative.
- The companion may present the employee's case, sum up, and respond on their behalf, but may not answer questions directed to the employee.

1.3 Record-Keeping

- All grievance proceedings must be documented and retained in the employee's file.
 - Retention period: minimum 6 years from the date of the final outcome, or longer if required by the nature of the complaint.
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2. Performance Management & PIPs

2.1 Pre-PIP Documentation

- Best practice requires at least two documented conversations between manager and employee before a formal PIP is initiated.
- Documentation should include the date, attendees, topics discussed, and agreed actions.
- The employee should be given a reasonable opportunity to improve before formal proceedings are started. Guidance suggests a minimum of 4 weeks between the first documented conversation and PIP initiation, though no statutory minimum exists.

2.2 PIP Communication

- A PIP must be communicated in writing. Verbal-only communication of a PIP is insufficient and may be challenged.
- The PIP document should specify measurable objectives, the review timeline, support available, and consequences of non-improvement.
- (unconfirmed) Some advisory sources suggest the PIP should be counter-signed by an HR representative before delivery to the employee. This is not a universal requirement but is considered best practice in professional services firms of our size.

2.3 Probation Period Management

- Probation reviews should be conducted and documented before the end of the probation period.
- If no review is conducted, the employee may be deemed to have passed probation by default depending on the terms of their contract.
- The employer should maintain a consistent format for probation review documentation across all departments. (Our current policy leaves this to manager discretion, which may create inconsistency.)

3. Equal Pay & Compensation Equity

3.1 Comparable Pay Obligation

- Employees performing equivalent work at the same grade level are entitled to comparable pay unless a material factor justifies the difference.
- Material factors may include length of service, qualifications, geographic location, or market rate at time of hire.

3.2 Acquisition Salary Protections

- When employees are acquired through business transfers, their existing salary terms are typically protected for a transitional period specified in the transfer agreement.
- At the end of the protection period, the employer must either: (a) transition affected employees to the standard pay framework, or (b) document the rationale for continuing different terms.
- (unconfirmed) Some guidance suggests a formal communication to affected employees at least 30 days before the protection period expires, explaining what changes will occur and how any salary gaps will be addressed. I could not find this in our compliance library — it may be an advisory recommendation rather than a statutory obligation.

3.3 Pay Equity Audits

- Employers with more than 250 employees are required to report gender pay gap data annually.
 - Broader pay equity audits (beyond gender) are recommended but not currently mandatory.
 - Where an employee raises a pay equity concern or grievance, the employer should be able to demonstrate that a review was conducted and a material factor justification exists for any identified gap.
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4. Workplace Conflict & Post-Acquisition Integration

4.1 Early Intervention

- Employers have a duty to take reasonable steps to prevent and address workplace conflict.
- Early intervention — informal discussion, facilitated conversation, or mediation — is preferred over formal proceedings where appropriate.
- The manager's obligation to intervene applies regardless of whether a formal complaint has been filed.

4.2 Mediation

- Mediation should be offered as an option before or alongside formal proceedings.
- Mediators should be independent of the parties involved. Using line managers or colleagues who report to one of the parties is not appropriate.
- There is no statutory timeframe for arranging mediation, but unreasonable delay could be viewed as a failure to act.

4.3 Post-Acquisition Team Integration

- No specific regulatory framework governs post-acquisition cultural or team integration.
 - However, where acquired employees experience disadvantage (e.g., exclusion from projects, differential treatment, pay inequity), the employer may face discrimination or unfair treatment claims.
 - Advisory guidance suggests establishing a documented integration protocol within 6 months of acquisition close. Northbridge completed the Meridian acquisition over 12 months ago and no protocol is currently documented. (This was flagged by the Employee Relations Specialist in the current survey cycle.)
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5. Escalation & Severity Criteria

5.1 Multi-Complaint Trigger

- Where two or more formal complaints name the same respondent within a 12-month period, the matter should be escalated to senior HR leadership for a pattern review.
- This trigger was added to our internal escalation framework in a recent policy update but has not yet been applied to any live cases.

5.2 Overdue Response Escalation

- Cases that remain open beyond twice the stated response timeline should be escalated one severity level.
- This escalation should be documented and communicated to the case owner.

5.3 Engagement Survey Correlation

- (unconfirmed) In a recent policy cycle, our escalation criteria were updated to include an engagement survey correlation trigger: when a case theme correlates with a survey risk flag rated High or Critical, the case should be flagged for policy-level review. This criterion has not been formally applied yet and there is ambiguity about what constitutes sufficient correlation.