**CONFLICT DYNAMICS**

MODEL

WORKPLACE MEDIATION

SETTLEMENT AGREEMENT

**This Model Settlement Agreement is for guidance only. The outcome of a workplace mediation may also be known as a ‘Framework Agreement’, a ‘Memorandum of Understanding’ or an ‘Action plan”. Any agreement will need to be adapted to the particular circumstances and legal requirements of the settlement to which it relates.**

**CONFIDENTIAL**

**AGREED IN THE MEDIATION MEETING BETWEEN**

**XXX AND XXX**

**(date)**

XXX and XXX discussed the issues that have given rise to the difficulties in their working relationship. They made the following commitments in respect of how they will in future work with each other and in their autonomous roles:

**XXX undertakes to:**

* List undertakings

**XXX undertakes to:**

* List undertakings

It was further agreed that :

* XXX and XXX will work on achieving these commitments over the next 30 days;
* The mediator with follow up within them on their progress in two weeks’ time and again in four weeks’ time;
* The mediator will forward this agreement to XXX to update him/her on progress in the achievement of these commitments.

Party A ………………………………………….

Address ………………………………………….

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Signed ……………………………………………

Dated……………………………………………...

Party B …………………………………………..

Address ………………………………………….

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Signed ……………………………………………

Dated……………………………………………...