

Guidelines for Complaints and Response Mechanism

Approved by the management of ERIKS Development Partner 29/05/2018

1. Introduction

In line with the commitments made in the Code of Conduct, Anti-corruption policy and Child Protection policy of ERIKS Development Partner, the organisation's Complaints and Response Mechanism is outlined in this document.

ERIKS Development Partner (ERIKS) values good partnership and accountability in relation to rights-holders, local communities, partner organisations, back donors and other stakeholders. As part of its on-going process to improve accountability and transparency, ERIKS is committed to implement a Complaints and Response Mechanisms (CRM) in all aspects of its programme work. ERIKS believes that the Complaints and Response Mechanism is a valuable tool to promote accountability and transparency, as well as continuous learning and development of all its programmes/projects.

The CRM handles complaints regarding all ERIKS Programme work connected to possible violations of our agreements, guidelines, policies, code of conduct and national legislation in Sweden and/or programme countries. Complaints not linked to any of the categories above or relating to ERIKS Second Hand shops will not be handled according to ERIKS' CRM.

2. Who can lodge a complaint?

Through the CRM, all actors involved in or impacted by ERIKS programme work have the possibility to lodge a complaint, including:

- anyone who participates in or is impacted by projects implemented by ERIKS or by local partner organisations
- ERIKS' partner organisations and their employees
- institutional donors and other back donors
- ERIKS' staff

3. In what cases can complaints be submitted?

A complaint can be submitted if ERIKS and its staff members do not fulfil their obligations and commitments, as specified below:

- commitments according to ERIKS Anti-Corruption Policy
- commitments stipulated in ERIKS Code of Conduct and Child Protection Policy signed by ERIKS staff
- commitments described in Project/Programme Agreements with implementing partner organisations
- commitments described in Framework and Project Agreements with SMC (Swedish Mission Council)/Sida (Swedish International Development Cooperation Agency), Radiohjälpen Foundation, Swedish Postcode Lottery and/or other back donors
- in cases of suspected illegal actions by staff of ERIKS or implementing partner organisations

If a complaint does not correspond to the examples listed above the matter will be treated as general feedback and will not be followed up through ERIKS' CRM.

ERIKS is striving to meet the highest quality in its development and humanitarian programmes and takes matters of misuse of power seriously, including the actions of the staff of the local partner organisations. Therefore ERIKS also accepts complaints raised towards ERIKS local partner organisations and their employees.

ERIKS is committed to working in a transparent and responsible way that builds trust of all our stakeholders and target groups. According to ERIKS' Project Agreement, the partner organisation is committing to work to prevent, detect and identify any illegal action or misuse of funds.

4. How to raise a complaint

The following tools can be used to raise a complaint:

- Through the form to submit a complaint on ERIKS' website <https://erikshjalpen.se/complaints/>. It is recommended to use this form in order for ERIKS to receive the necessary information to investigate the matter and give a proper response as soon as possible. If preferred, the complaint can be raised anonymously.
- By sending an e-mail to complaint@erikshjalpen.se
- Communication/meeting with ERIKS' staff members, who will refer the complaint to ERIKS' CRM Group (see below).

In line with ERIKS' commitment regarding accountability and transparency, all partner organisations are encouraged and supported to develop their own CRM, with appropriate and locally adopted mechanisms and procedures.

5. Response procedure

ERIKS will follow up on complaints received. All complaints will be taken seriously, whether submitted anonymously or by a named source.

ERIKS will respond to a complaint, through preferred means of communication as stated in the submitted complaint, within one month. If the complaint leads to an investigation that requires more time, the person who lodged the complaint will be informed. If the complaint was submitted anonymously the ability to give a response to the person who raised the complaint will be limited, but all aspects of the response procedure will be followed and documented accordingly.

ERIKS CRM Group (Secretary General, Head of Programme Department and Controller) carries the main responsibility for handling the complaints received, in line with the following procedure:

- 1.** The complaint is received by ERIKS CRM Group and is given a reference number in ERIKS' database. Access to the database is limited to the CRM group. A confirmation (if the complaint was not received anonymously) is communicated via e-mail, telephone or letter (preferred means of communication stated in the submitted complaint).
- 2.** An initial assessment of the complaint is performed by the CRM group. Depending on the nature of the complaint, additional resources (for example responsible Programme Coordinator or Representative from HR Department) are added to the group during the continued process.

<p>If the complaint in any way is pointing towards any of the members of the CRM Group, the complaint is forwarded to ERIKS Board and/or External Auditor/Investigator.</p>
<p>3. After an initial investigation, ERIKS CRM Group decides about possible actions necessary pending further investigation. Depending on nature and level of complaint other stakeholders (external donors, ERIKS Board) is updated during the continued process.</p> <p>ERIKS Fraud and Corruption Response Plan directs the process further in case of suspected fraud and/or corruption.</p>
<p>4. Depending on the nature and level of complaint, ERIKS CRM Group takes decision to start either an internal or external investigation of the lodged complaint. The CRM group facilitates the process, but have the possibility to make use of resources available internally or within partner organisations if necessary and possible.</p>
<p>5. Depending on the result of the investigation, ERIKS CRM Group decides about further actions in line with ERIKS' policies and procedures.</p>
<p>6. The person who submitted the complaint receives a written response. In case of anonymously submitted complaints, the possibilities to provide a response will be limited. All decisions will be followed by immediate action.</p>
<p>7. ERIKS CRM Group prepares an action plan in which necessary measures, depending on type of complaint, are specified.</p>

6. Confidentiality

Complaints will always be treated with confidentiality. Name and contact details will not be revealed to any person outside the investigation (if an investigation is needed). Confidentiality is critical in order to protect the privacy and safety of the person submitting the complaint. However, in matters involving illegal actions and if a judicial procedure is to be conducted, it might not be possible to keep the identity confidential. In such cases, ERIKS CRM Group will inform and discuss possible actions necessary together with the person that lodged the complaint. A person who submits a complaint is expected to keep the matter confidential pending investigation.

It is always possible to lodge anonymous complaints through ERIKS CRM. All procedures described in this document are also valid for anonymous complaints. However, the possibility to provide response and follow-up together with the person who lodged the complaint might be limited.

ERIKS will not tolerate harassment or victimization of anyone raising a genuine concern through ERIKS CRM. Through these guidelines, ERIKS is committed to protect the person who lodges a complaint from any kind of unfair detriment. However, a staff member who purposely makes false accusations about another staff member may be subjected to disciplinary actions.

7. Appeal procedure

If the person who has submitted a complaint is not satisfied with the response and decisions made he/she may lodge an appeal through the Complaint and Response Mechanisms described above, stating the reference number.

8. Partner organisations and CRM

ERIKS always strives to be an organisation where transparency, learning and continuous improvement are key values. According to ERIKS, these values are a prerequisite for the

implementation of its vision of a better world where children's dreams come true. As part of the on-going process to improve accountability, ERIKS encourages partner organisations to develop and use their own systems for handling complaints. This is important for increased accessibility and transparency in project areas and to promote that complaints are lodged and responded to as close to the situation as possible.

In order for the right-holders to be able to raise a complaint, partner organisations are expected, as a minimum, to provide information regarding names and contact information to project management and other leaders in the partner organisation. If the implementing partner organisation has a system for handling complaints, it is expected that the system includes the projects supported by ERIKS.