

## Feedback, Complaints and Whistle Blowing Procedure

### 1. Introduction of the procedure

This Feedback, Complaints and Whistle Blowing Procedure constitutes annex 4 of the Help a Child Integrity Policy and is put in place to allow the beneficiaries, staff and other stakeholders of Help a Child to share feedback, concerns and complaints on communications, actions and behavior related to our work, have them heard and properly addressed.

Guiding principles:

- Help a Child is guided by the vision of all our beneficiaries to have a life in dignity, with love and with a promising future.
- Help a Child takes feedback, concerns and complaints seriously and positively. It shall address all issues of (sexual) exploitation, abuse of power, corruption, illegal activities and breach of our policies and standards.
- Help a Child is committed to have an effective procedure for handling and responding to feedback, concerns and complaints. Procedures should be understandable and accessible.
- Help a Child strives to protect the complainant, the victim and the suspect. When necessary, adequate support will be made available to them.
- Appropriate cultural and local practices should be respected in the development of complaints mechanisms.
- Both complainants and accused have a right to challenge decisions and to be properly informed about the basis on which decisions have been made. At any point the confidentiality aspect shall be maintained.
- The procedure for complaints will be reviewed regularly to ensure and incorporate learning and improvement towards Help a Child's accountability.

Definitions:

- **Complaint:** is an expression of dissatisfaction or something that is unacceptable. This can be dissatisfaction with program activities, behavior of staff, etc. about which someone raises a complaint.
- **Concern:** having a concern has to do with a worry. "Whistleblowing" is the term used when someone passes on information concerning wrongdoing; "making a disclosure".
- **Feedback:** information about reactions to a service, a person's performance, etc., which can be something to improve, an advice to repeat an activity, or a tip, etc.

This policy deals with feedback, concerns and complaints related to the organization's Integrity Policy and raised in response to certain program activities or possible misconduct of any representative of Help a Child (e.g. staff, consultants, volunteers, trainees, interns, and group travel guides and participants). Also, it addresses concerns and complaints about possible misconduct by a partner of Help a Child.

## 2. Sharing feedback, concerns and complaints

### 2.1 Conducive environment

Help a Child is committed to protect its beneficiaries and staff from any abuse and to provide an effective procedure for handling and responding and addressing to concerns, complaints and feedback. Also, all persons working on behalf of Help a Child or being authorized to visit its programs should respond positively to any complaints made to them and feel confident to do so. The organization (senior management) should ensure an atmosphere of trust, confidence and value orientation for this purpose. Guidance and procedures are provided for staff and communities supported by Help a Child, in order to avoid ad hoc, defensive, negative responses and uncertainty about what is expected of staff in responding to complaints.

All concerns and complaints shared are confidential. All records/reports are kept in a secured folder with limited access. Disclosure of information only can be made to relevant parties on need to know basis.

In each country with a Help a Child Country Office a focal person from among Help a Child country staff is chosen. This person is responsible for ensuring that:

- staff is aware of and has good knowledge of the Feedback, Complaints and Whistle Blowing Procedure;
- a context-appropriate response mechanism is put in place, where possible in close collaboration with the staff of the involved partner organizations and the target communities;
- target communities are aware of the Feedback, Complaints and Whistle Blowing Procedure and know how to share feedback, concerns and complaints;
- the Feedback, Complaints and Whistle Blowing Procedure is adhered to in the particular country.

In a Help a Child program country without a Help a Child country office agreements should be made with the organization's partners to ensure the staff of these partners are made aware of Help a Child's Feedback, Complaints and Whistle Blowing Procedure; a context-appropriate response mechanism is put in place, where possible in close collaboration with the target communities; target communities are aware of the Feedback, Complaints and Whistle Blowing Procedure and know how to share feedback, concerns or complaints; the procedure is adhered to in the particular country.

### 2.2 Confidential counselling and reporting mechanisms

Help a Child assigned an Confidential Counselor to support people experiencing or witnessing misconduct by Help a Child's representatives and/or in our programs. Conversations between the Confidential Counselor and the person asking for advise are strictly confidential. The support includes: a listening ear; support in the clarification of the type of misconduct experienced (e.g. moral protest, violation of integrity); advise on possible steps to be taken; support in making a decision related to this.

The Confidential Counselor is not the one to report to. The Counselor can refer to the reporting channels for violations of integrity; HR for employment issues, care referral and coaching; the organizational moral committee to discuss moral protests and doubts. The person asking for advice from the Counselor can still choose not to report the issue.

The leaflet in annex 5 of the Integrity policy contains more information on Help a Child's confidential counselling.

### **Reporting channels for Help a Child staff and partner staff**

Help a Child staff or partner staff can choose from several channels to report their concern or complaint:

#### *The management*

- Filling out the below complaint reporting form and sending it to their line manager.

#### The Integrity Team

- Filling out the below complaint reporting form and sending it to the country office Integrity Focal Point.
- Filling out the below complaint reporting form and sending it to the Coordinator Integrity ([integritycoordinator@redeenkind.nl](mailto:integritycoordinator@redeenkind.nl)).
- Calling the Coordinator Integrity or the country Integrity Focal Point.
- Filling out the feedback and complaint form on the Help a Child website; a channel which is also managed by the Coordinator Integrity.

### **Reporting mechanisms for supported communities**

At the start of every new project the type of reporting mechanisms used by the target community will be agreed upon together with these communities. Examples of possible complaints mechanisms are:

- A concerns & complaints box
- E-mail
- Phone
- In person
- Through a trusted intermediary

### **Channel for anybody who wants to share feedback or a complaint**

Both our Dutch and international website mention the organization's address, telephone number and Email address and include a feedback and complaint form that can be used by anybody to share feedback, concerns or complaints.

- Link to the feedback and complaint form on the Dutch website: <https://www.redeenkind.nl/contact>
- Link to the feedback and complaint form on the Dutch website: <https://helpachild.org/contact-us>

### **Complaints about partner organizations of help a child**

When the concern or complaint concerns a partner organization which is implementing a project on behalf of Help a Child, the complaint should in the first instance be addressed to the partner organization. To ensure that these concerns and complains are dealt with well, having a integrity focal person and a complaints handling mechanism in place is a condition for

contracting. Concerns and complaints received by partner organizations always have to be reported to Help a Child and Help a Child will review and assess whether complaints have been accurately handled.

### *2.3 Timeframe*

Any concern or complaint should be reported as soon as possible, preferable no later than one week from the date when the incident happened. This gives Help a Child the ability to respond adequate and timely and to ensure evidence is not getting lost.

Complaints received by partner organizations always have to be reported to the Help a Child within one week. In case a complaint is raised about (staff of) Help a Child, the country office always has to report the complaint to the international office within 72 hours after receiving the complaint.

### 3. Handling feedback, concerns and complaints

This sections describes the procedure to be followed in case a complaint is received. Wherever a “complaint” is mentioned, this refers to both a concern and a complaint.

#### 3.1 Communication of Complaint

A concern or complaint may be brought directly to the attention of a staff person. In cases the person receiving the complaint is not the designated focal point, the staff shall forward the complaint to a member of the Integrity Team or the Line Manager using the abovementioned reporting channels.<sup>1</sup> This person will acknowledge receipt of the complaint and inform the Complainant about the procedure. All concerns and complaints reported will be filed in a complaints register, in order to facilitate monitoring and adequate follow-up.

As said before, concerns and complaints received by partner organizations always have to be reported to Help a Child using the abovementioned reporting channels. Concerns or complaints about (staff of) Help a Child need to be reported to the Coordinator Integrity or the CEO at the international office.

To raise a complaint anonymously is possible, but there should always be a way to contact the complainant.

#### 3.2 Analysis of situation

Within 1 week after a concern or complaint has been received by Help a Child a case description is made by the Line Manager, Integrity Focal Point or a person assigned by the Coordinator Integrity. In case of suspected fraud or corruption, this case description will be made by the Finance Manager as described by the Anti-Fraud and Corruption Policy. For a case description all related and relevant information is included in order to be able to make a well informed decision whether to investigate the allegation. This will be done by (at least) addressing the following questions:

- Is there a complaint? The complaint must be a genuine concern of the complainant, raised in good faith, and is not motivated with the intent for personal gain, personal interest or a grudge. If it is determined that the complaint was not made in good faith, disciplinary measures can be taken.
- Does the complaint relate to a breach of Help a Child’s Integrity Policy, a violation of any of the Help a Childs policies and guidelines, or a violation of law?
- Is the complainant or anyone else immediately or potentially at risk?
- Is there sufficient information and evidence or is there a need to further investigate?
- At this point, is the allegation conclusive enough to take management action?

The person analyzing the case has the option to request advise from the Finance Manager, (Child) Protection Expert and/or the Coordinator Integrity. For issues at country level it is the Country Program Director (CPD) who decides on the basis of the case description whether 1) an investigation is justified, 2) suspension of work of any of the staff is necessary (e.g. for safety

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<sup>1</sup> A concern or complaint about the Line Manager can be directed to the Coordinator Integrity or CEO, a complaint about the Coordinator Integrity can be directed to the Line Manager or CEO, and a complaint about the CEO can be directed to the Coordinator Integrity or the Supervisory Board (except for the Confidential Counselor).

and protection reasons); and 3) reporting to donor and/or authorities is needed. For issues at international level it is the CEO who decides on these three factors. Suspension will always be done in a respectful and confidential way. The CPD will share the case report and his/her decision on an investigation with the CEO.

In case a child is involved in the allegation the *Child Safeguarding Policy* needs to be adhered to, in case of suspected fraud the *Fraud and Anti-Corruption Policy* needs to be followed. Furthermore, if the complainant or anyone else involved is at immediate or potential risk, adequate action should be taken to ensure that he/she is protected from any possible (future) harm.

In case a complaint is about a breach of the *Code of Conduct* or *Child Safeguarding Policy* the complaint should always be investigated and the management of Help a Child International should be informed.

Operational complaints (related to program activities) not needing a formal investigation will go through the normal process of action and decision-making of the program implementation team.

The complainant will be informed by the line manager or integrity focal point about the result of the analysis and the way forward. In such a case staff of Help a Child is involved, the person(s) concerned will be informed beforehand about the allegation and the decision to perform an investigation.

### 3.3 Investigation

If Help a Child decides to perform an investigation this investigation will start as soon as possible, but latest within 2 weeks after receiving the complaint.

The CPD (country issue) or CEO (international issue) will appoint a team to be responsible for the investigation. The composition of the investigation team will vary in different situations and depends on the nature of the complaint and the persons involved. The team generally consists of an Integrity Team member and the HR Manager. If a child is involved, the Help a Child International Child Protection Expert will be part of the team. In case of suspected fraud or corruption, the Help a Child International Finance Manager will be part of the team.

The investigation is guided by the following principles:

- *Protection & Confidentiality*: Investigation of reported incidents always prioritize the protection and interests of the victims, complainants and the accused. When necessary, adequate support will be made available to them. All matters related to complaints are confidential.
- *Impartiality*: the investigation must be conducted in an unbiased, fair and respectful manner.
- *Accountability*: Those who conduct the investigation must adhere to these guidelines and must record accurately and comprehensively the steps which are employed in conducting an investigation. The methods and techniques employed in the investigation must be appropriate for the circumstances and proportional to the objectives of the investigation.

- *Transparency:* Help a Child staff, partner staff and persons of the affected community know that this procedure exists and know how to access those involved in conducting the investigation procedure.

### 3.4 Follow-up

The investigation team must write an investigation report. This is a summary that should address all aspects of the investigation including how the alleged misconduct was discovered, the steps taken to gather the evidence, the investigators conclusions and the evidence supporting those conclusions. The conclusion of the investigation must be clearly stated in the investigation report. The investigation team will submit the investigation report to the Help a Child Management Team (MT) for consideration and approval. This should demonstrate and document that the complaint has been well investigated, relevant authorities have been informed (if appropriate) and interest and rights of the victim, complainant as well as alleged persons have been respected during the entire investigation process.

Based upon the investigation report, and within 2 weeks from receiving the report, the MT will decide upon the appropriate action. The complainant will be informed about the result of the investigation.

### 3.5 Sanctioning

Appropriate action will be taken if staff is found guilty. Depending on the severity appropriate actions might include termination of contract and legal action if required, as described in the employment conditions manual. Help a Child has a zero tolerance against physical sexual exploitation and abuse. Any substantiated and proven case of physical sexual exploitation and abuse will always lead to direct termination of employment.

#### **4. Monitoring & Evaluation of the complaints mechanism**

The use of the complaints mechanism will be monitored by the Coordinator Integrity in coordination with the country Integrity Focal Points. The Coordinator Integrity together with the country focal points will promote the philosophy behind the procedure through training programs for Help a Child staff and partner staff on integrity related topics and by contributing to various means of quality assurance and accountability.

The Feedback, Complaints and Whistle Blowing Procedure can be updated and reviewed whenever there is a need to upgrade the system. A standard review will be done bi-annually, based on the complaint register - including issues of moral protest or doubt - and policy implementation monitoring results and lessons learned. All Integrity Focal Points share their observations during a bi-annual evaluation Skype-meeting of the Integrity Team. Besides policy revisions, an annual report will be made by the Coordinator Integrity to be shared with the MT. The complaints register and subsequent lessons learned will be evaluated once or twice a year during the Strategic Consultation Meeting, which is a meeting with the MT of Help a Child International and the CPDs.



## 5. Reporting form

Note: it is important to provide as much as possible details of what was observed. The information will be dealt with in confidential manner.

### Name of person reporting

<b>Name</b>	
<b>Position</b>	
<b>Contact details</b>	
<b>Date of reporting</b>	

### Description of the complaint/concern

<b>What happened?</b>	
<b>Where did it happen?</b>	
<b>When? (date and time)</b>	
<b>Who was involved as alleged staff/trainee /intern/consultant/ volunteer of HAC?</b>	
<b>What are details of the child involved?</b>	
<b>Any other witnesses?</b>	

### Intervention so far

<b>What was done so far?</b>	
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### Action taken by HAC (Country director and Management Team)

<b>Case report built</b>			
<b>Investigation of the situation</b>			
<b>Support for child (and family) arranged</b>			
<b>Accused staff member heard</b>			
<b>Action taken</b>			
<b>Status of allegation</b>	Dropped, since not true	Internally sorted	Referred to legal authorities

## 6. Reporting and response flowchart

