

POLICY NAME: Complaints Policy
APPROVED BY: CPAC
POLICY OWNER: Co-Directors, HR

CATEGORY: Human Resources
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1. INTRODUCTION

World Renew's tagline is based on Micah 6:8 and captures the overriding values and motivations for our work: "Doing justice, loving mercy and serving Christ" in all we do. World Renew embraces the value of "People Flourishing" as the way that God desires people to live in beloved community with one another. For people to flourish, we must love God, love others, and love ourselves. As we recognize God's image in every person, we know that whatever we do to each other; we do to God (Matthew 25). God holds us accountable for our actions, and we are called to hold each other accountable, so that all may experience the fullness of life God has promised and intended. Our value of "People Flourishing" means that "We treat each person equally as an image-bearer of God." In World Renew, we know that our world, and we ourselves, are fallen and broken; and that God works to redeem and renew us and our world. This reality shapes our approach to our work and the policies that we choose to govern our decisions. Ephesians 5:8-11 summarises this perspective: "For you were once darkness, but now you are light in the Lord. Live as children of light (for the fruit of the light consists in all goodness, righteousness and truth) and find out what pleases the Lord. Have nothing to do with the fruitless deeds of darkness, but rather expose them."¹

This passage in Ephesians demonstrates that we must always seek truth; and when wrongs are committed they must be exposed and addressed rather than covered up. This Complaints Policy seeks to create structures that will comply with applicable state, provincial, and federal laws; and facilitate the speaking of truth, the exposure of what is wrong, and the establishment of right actions.

World Renew is also committed to providing high-quality disaster response, development and justice programmes and to working in an open and accountable way. In an effort to achieve high quality, World Renew strives to meet and even surpass the expectations of its stakeholders (i.e. communities with whom World Renew works, partners, supporters, donors and the public). There may, however, be occasions when World Renew does not meet the reasonable expectations of all stakeholders at all times. In such cases stakeholders have a right to raise a concern, give feedback and, if necessary, lodge a complaint.

¹ Ephesians 5: 8-11, The Bible, New International Version (NIV)

In line with World Renew's overarching commitment to the Core Humanitarian Standard (CHS), World Renew is committed to ensuring that complaints are welcomed and addressed at all levels of the organisation and that communities and people affected by crisis, in particular, have access to safe and responsive mechanisms to handle complaints.

This policy complements and supports the implementation of a number of related policies, including but not limited to, the World Renew Codes of Conduct, the Child Safeguarding Policy, the Code of Conduct Policy, the Safeguarding Vulnerable Adults Policy, the Preventing Sexual Exploitation and Abuse (PSEA) Policy and the Anti-Fraud and Corruption Policy. It also supports the implementation of existing procedures such as incident reporting procedures.

2. SCOPE

This policy² outlines how we address our quality and accountability commitment to complaints handling. It applies to all the work performed and/or financially supported by World Renew. This includes our activities, processes and conduct of staff and partner staff. It is the intention of World Renew to handle complaints in a fair, appropriate and prompt manner.

3. PURPOSE

The stakeholders of World Renew's work are entitled to give feedback and complain if we do not fulfil our commitments. In this way, we can improve the quality of our work, reduce inefficiencies and prevent misconduct and/or unlawful appropriation of the resources we manage. In addition, the Complaints Policy contributes to greater ownership among our stakeholders as they can raise perceived shortcomings or concerns in our activities, procedures and conduct with the knowledge that we will welcome the complaint and respond appropriately.

² The World Renew Complaints Policy has been adapted from the ACT Alliance Complaints Policy (<https://actalliance.org/wp-content/uploads/2017/01/ACT-Complaints-Policy-Oct-2016-E.pdf>) and the Church of Sweden Guidelines for Handling Complaints (<https://www.svenskakyrkan.se/internationelltarbete/how-to-make-complaints>)

4. PRINCIPLES

This policy is based on the following principles, drawn from the Core Humanitarian Standard (CHS)

- World Renew welcomes feedback and complaints as a means of learning - leading to improved quality and greater accountability.
- World Renew seeks to build an organisational culture in which complaints are taken seriously and acted upon according to defined policies, processes and applicable laws.
- World Renew seeks to handle complaints in a timely, fair and appropriate manner that prioritises the safety of the complainant and those affected at all times.

5. POLICY

The following sections outline the key elements of World Renew's Complaints Policy. More detailed and specific guidance on how to implement this policy in different contexts can be found in the supporting document "World Renew Complaints Handling and Investigation Guidelines".

5.1 Types of Complaints

World Renew distinguishes between feedback, concerns and complaints. All of these are welcomed and may be received via the complaints mechanism.

Feedback is a positive or negative opinion or information by a stakeholder about World Renew or its partners' work to improve or express satisfaction with our activities and/or processes. When feedback is given, there is no intention of submitting a formal complaint. Feedback is welcomed but requires no formal response.

A **concern** is when there is an issue related to the safeguarding of a child or vulnerable adult which is not as a result of the behaviour of World Renew staff or partner staff behaviour, and therefore does not result in a 'complaint' against that staff. Instead, a concern must be reported so that appropriate referral or action can be taken in the best interests of the child or vulnerable adult.

A **complaint** is a specific grievance of anyone who has been negatively affected by the work of World Renew or their partner, or who considers that World Renew has not fulfilled a stated commitment or is in breach of a World Renew Policy. This includes staff behaviour in relation to the World Renew Codes of Conduct. World Renew will handle complaints in a fair, appropriate and prompt

manner. A complaint necessitates a response.

World Renew endeavours to ensure that we have a transparent and accountable approach in all our interactions. For this reason, we encourage our staff, partners, target groups and other stakeholders to address programme related feedback informally and as close to the concern in question (ie address project level feedback at the project level where possible) in order to resolve the issue as quickly and efficiently as possible.

When appropriate, lodging a formal complaint through the mechanism should be seen as a last resort if a problem cannot be resolved in any other manner. However, all complaints related to concerns on the behaviour of staff regarding corruption, fraud, discriminatory treatment, sexual exploitation and abuse must be handled through the complaints mechanism and formally lodged as a complaint.

Anonymous complaints: World Renew recognises that at times, people with genuine concerns cannot speak out because of special circumstances and may wish to submit a complaint without revealing their identity. World Renew therefore also handles anonymous complaints when there is sufficient information for further action. World Renew will provide a response to the anonymous complainant when possible, unless the complainant has requested that s/he does not receive a response or does not provide contact details to enable a response.

A **malicious complaint** is an accusation deliberately made on false grounds with the aim of causing harm to another individual, an organisation or of promoting one's own goal or agenda. If a malicious complaint is made by a staff member of World Renew, disciplinary action will be taken.

If during an investigation it is found that a complaint has been made on deliberately false grounds, the investigation must stop immediately and the subject of the complaint cleared of all suspicion. Complaints made in good faith that are subsequently proved to be unfounded are not malicious and will not be treated as such.

5.2 Who can Make a Complaint?

The following stakeholders may make a complaint and receive a response to their complaint:

- Anyone who participates in or is impacted by projects that World Renew carries out itself or with a partner .
- World Renew's partners and partner staff.

- Donors, volunteers and others involved in or affected by World Renew’s work.
- World Renew Staff, including but not limited to all permanent and temporary staff, volunteers, consultants, exposure visit participants, contractors and fieldworkers.

5.3 What Complaints can be Made?

World Renew handles complaints concerning shortcomings in compliance with the commitments defined in World Renew’s Quality and Accountability Framework (QAF), including the World Renew Codes of Conduct. This includes:

- Implementation of projects that World Renew performs itself or with a partner that does not live up to stated commitments or applicable standards, principles and guidelines.
- Perceived shortcomings in World Renew’s and/or partner’s handling of commitments in a Memorandum of Understanding, financial commitment, membership agreement or other types of agreements.³
- Perceived lack of respect for a private or individual donor and/or the donor’s wishes when handling donations.
- Suspicion of or testimony on breaches of World Renew’s Codes of Conduct and related policies by staff and/or partner’s staff, including corruption, fraud, sexual exploitation and abuse, and not ensuring the safeguarding of children and/or vulnerable adults.

If it is assessed that a complaint falls outside the scope of these guidelines, the complainant will be informed of this outcome. World Renew does not handle the following types of complaints:

- Complaints against a project or a partner that is not financially supported by World Renew. In such cases, the complaint can be referred to that other organisation.
- Complaints about a policy or position paper adopted by World Renew within the scope of its international work.
- Complaints from World Renew staff or partner staff related to terms of employment and labour matters. World Renew staff shall address such complaints directly to her/his immediate supervisor or to the Human Resources (HR) department.

5.4 Responsibilities for Handling Complaints

All staff have a responsibility for welcoming complaints. All staff should respond positively to any complaints made to them and feel confident to do so. Senior management should ensure an atmosphere of trust, confidence and value

³ This also includes our responsibilities as a member of the ACT Alliance and the CHS Alliance.

orientation for this purpose. Minimally, all staff should feel confident to welcome a complaint and to refer the complainant to the appropriate Safeguarding and Complaints Focal Point or to the Safeguarding and Complaints Coordinator at Home Office and to explain the basic elements of the complaints procedures as outlined in this policy and on the World Renew website.

Given the diversity of contexts that World Renew is operational in, and the range of operating models in place, it is the responsibility of the World Renew Ministry Team Leader, at the regional level, to ensure that a complaints mechanism is established, relevant and functional in each operating context – be that at project, programme, country or regional level. This is done in consultation with the Safeguarding and Complaints Coordinator at Home Office level.

At a programme, country or regional level⁴, World Renew’s Safeguarding and Complaints Focal Points are responsible for receiving all complaints and ensuring that complaints are managed according to this complaints policy and the procedures described herein. The Safeguarding and Complaints Focal Points prepare and present complaints to their respective Complaints Advisory Groups. The Safeguarding and Complaints Focal Points are also responsible for ensuring that complaints and lessons learned are documented and that files are kept complete and secure. In consultation with their respective Complaints Advisory Group, the focal points are responsible for reporting regularly to their supervisor and other relevant local senior staff as appropriate, on the complaints received. Safeguarding and Complaints Focal Points are also responsible for reporting at least annually to the Safeguarding and Complaints Coordinator at the Home Office.

Complaints Advisory Groups are established in each operational context where a Safeguarding and Complaints Focal Point is in place. The complaints advisory groups are responsible for advising the safeguarding and complaints focal points on how to handle complaints in line with World Renew’s Complaints Policy and Complaints Handling and Investigation Guidelines.

World Renew’s Safeguarding and Complaints Coordinator is responsible for monitoring and proposing revisions to this policy as well as internal information sharing of the content and provision of support and capacity building to designated Safeguarding and Focal Points at programme, country or regional levels. They are also responsible for ensuring that each complaint they receive is managed, dealt with and documented according to this policy and that relevant reporting and learning on complaints is undertaken.

The Complaints Handling Committee is established at the Home Office level

⁴ Given that there are a number of different operating models where World Renew programmes are implemented, appropriate complaints mechanisms, relevant to the context, need to be developed at either a programme, country or regional level. Further guidance on this contextualisation of this policy can be found in the World Renew Complaints Handling and Investigation Guidelines.

in support of the work of the Safeguarding and Complaints Coordinator. The Complaints Handling Committee (CHC) is responsible for providing advice, and supporting the management of, and decisions related to, complaints handling for all complaints received at the Home Office level. The CHC also has responsibility for supporting the management of all investigations into complaints, whether originating from the home office or having been referred from Complaints Advisory Groups or Safeguarding and Complaints Focal Points across the organisation.

World Renew's Co-Directors, with the support of the systems team, are responsible for the content of this policy and ensuring implementation throughout the organisation.

5.5 Working With Partners

World Renew will continuously work with partners to inform them about our Codes of Conduct and related policies, including this Complaints Policy and the possibility of complaining to World Renew within the scope of this policy. World Renew informs our partners that all stakeholders can complain directly to World Renew, including the target group and rights holders. World Renew will develop agreements with its partners on processes and routines for how complaints are to be handled within the partnership including acceptance of the outcomes of an investigation⁵. It is important to discuss with partners the possibility of early warning systems and neutral mediation to deal with misunderstandings and disagreements on strategic directions. Agreements shall be relevant to the context and be reviewed periodically. Full acceptance, good understanding and accountability on complaints handling between World Renew and our partners will improve the quality of partnerships, protect both partners and World Renew staff from abuse and mismanagement and help build trust.

It is the responsibility of our partners to handle and respond to the complaints made against them in a manner that is accessible and appropriate for the local context⁶. An accessible and appropriate complaints mechanism, designed in consultation with key stakeholders, includes ensuring stakeholders can complain and that they are informed about the expected behaviour of staff, how to complain and what can be complained about. Given that not all our partners have an established complaints mechanism, we are continuously working with those partners to encourage them to set up their own mechanisms. We also provide support and advice on how to set up such a mechanism and manage complaints and when deemed necessary we will on occasion handle complaints received against partners.

⁵ This does not need to be a separate agreement, but can be incorporated into the existing Partner MOUs or Partnership Agreements.

⁶ An accessible and appropriate complaints mechanism is developed through consultations with stakeholders on the design, implementation and monitoring of complaints.

5.6 How to Make a Complaint

A complaint should ideally be submitted as soon as a person is aware of the concern. Feedback about the shortcomings in the implementation of World Renew's activities and procedures should be submitted when the work is on-going, but at no point later than a year after the work is finalised. For complaints, there is no time limit, as World Renew will seek to handle and investigate all complaints as far as is possible⁷.

At programme, national and regional levels, complaints mechanisms will be established and the means of submitting a complaint (eg in written form through a Complaints Box, or by email or phone or in person to a designated focal point) will be communicated to relevant stakeholders in that location, either verbally or in writing as contextually appropriate. In cases where a local complaints mechanism has not been established, stakeholders are welcome to address their complaint to the World Renew Safeguarding and Complaints Coordinator at World Renew Home Office using the contact details provided in this policy.

Complaints can be addressed to the Safeguarding and Complaints Coordinator at World Renew using the following means:

- email: complaints@worldrenew.net
- letters:
 - Safeguarding and Complaints Coordinator, 3475 Mainway, STN LCD 1, Burlington, ON, L7R 3Y8
 - Safeguarding and Complaints Coordinator, 1700 28th St SE, Grand Rapids, MI, 49508
- in person.

World Renew's website provides further information on how to complain. In addition to providing the details of the complaint, complainants should also provide sufficient contact details so that they can be contacted for further information or to give a response. They can also state how they would like the complaint to be handled. A sample complaints letter form can be found in Annex 1, which can be used or adapted as necessary.

As World Renew is also a member of the ACT Alliance⁸ and CHS Alliance⁹, complaints regarding our work can also be submitted to these alliances using their complaints procedures (available on their websites). This must only be used in the event that the World Renew complaints mechanism has failed to welcome or respond to a complaint in line with this policy.

⁷ The Complaints Handling Committee will decide which complaints require investigation.

⁸ Email: complaintsbox@actalliance.org

⁹ Email: complaints@chsalliance.org

5.7 Procedures for Handling a Complaint

5.7.1 Acknowledgement of receipt: Those who submit a complaint will receive an acknowledgement of receipt of the complaint within no more than 5 business days of the complaint being submitted. Within 2 weeks, further information is provided to the complainant including at a minimum:

- confirmation of when and how the complaint was received;
- the assessment that World Renew has made of the complaint and whether or not it will be investigated;
- the name of the Complaints focal point or person in charge of handling the complaint, including contact details, in case of questions or the need for further information.

5.7.2 Determining the need for investigation: Not all complaints require a formal investigation. World Renew therefore encourages our staff, partners, target groups and other stakeholders to address such complaints informally and as close to the activity in question as possible. The Complaints Handling Committee decides if a complaint warrants an investigation. World Renew endeavours to always investigate allegations into staff members in breach of our Codes of Conduct and related policies, including cases of fraud, corruption, sexual exploitation and abuse, discrimination and failing to safeguard children and/or vulnerable adults.

5.7.3 Investigation process: When a safeguarding and complaints focal point, together with their complaints advisory group, believes that a preliminary or full investigation is warranted, they must immediately inform the Safeguarding and Complaints Coordinator at Home Office. The Safeguarding and Complaints Coordinator will then work with the Complaints Handling Committee to determine if the complaint warrants a formal investigation and if so, appoint an investigation team, investigation manager and investigator(s). The investigation team shall have the relevant professional and technical knowledge and qualifications for conducting an administrative preliminary or full investigation.

Investigations will be conducted in line with World Renew's Complaints Handling and Investigations Guidelines. World Renew handles all investigations with confidentiality, to the extent permitted by law, and taking the safety of all parties to the investigation into account¹⁰. All investigations should be initiated as soon as possible, but the timeframe for the investigation and submission of the investigation report is determined based on the nature of the complaint. The complainant should be given information on how long the investigation is expected to take. Staff members under investigation may be placed on paid

¹⁰ Any staff member involved in handling a complaint will be required to sign an Oath of Confidentiality. Any individual involved in an investigation who is not staff member of World Renew will be requested to sign an Oath of Confidentiality.

administrative leave until the conclusion of the investigation.

Investigations into allegations of corruption or fraud will be managed under the direction of the Chief Financial Officer (CFO) in line with applicable procedures, unless delegated otherwise.

Any allegation concerning breaches of World Renew's Code of Conduct and related policies by a World Renew staff member will be managed in coordination with the World Renew Human Resources department.

Allegations of discrimination, exploitation or abuse (in particular of a sexual nature) and complaints involving children must be given priority and handled promptly. These investigations are the responsibility of the HR department and will be dealt with in accordance with rules based on the relevant labour law and criminal law. Such investigations may be the subject of labour law measures and/or police investigation.

When necessary, World Renew will include a third party in investigations of its own staff, to ensure no conflict of interest.

5.7.4 Outcomes of an investigation: The investigation manager is responsible for writing the investigation report and presenting the investigation findings to the Hearing Committee. The Hearing Committee is composed of the members of the Complaints Handling Committee plus one person from a third party. The Hearing Committee will make a decision on the outcome of the investigation based on analysis of the context, the investigation findings and the investigation report.

Outcomes of an investigation will be communicated to the subject of the complaint(s) by at least two representatives of World Renew. This shall be done in person when possible and one of the representatives must be on the Complaints Handling Committee or a senior manager. The outcomes of an investigation will be communicated to the complainant(s), when possible, within a reasonable timeframe of receiving the complaint. In complex or exceptional cases, the investigation may take a long time. The complainant is informed in such cases that the results of the investigation will take time. The complainant(s) will not receive details of the investigation but will be informed of the outcomes.

5.7.5 Appeals: An appeal regarding the outcome of an investigation may only be made if new information emerges or there are special reasons that have not been considered in the previous handling of a complaint. An appeal may be lodged by either the Complainant or the Subject of the Complaint with the Co-Directors up to 30 days after the outcome of an investigation has been communicated. An appeal hearing will be conducted within a further 30 days by

both Co-Directors, after which a final decision is made and the case is closed.

5.7.6 Handling complaints about partners and their staff: Complaints relating to the work of a partner organisation and their staff will first and foremost be forwarded to the partner pursuant to their complaints procedures. The complainant must be informed of this as in some cases the person may prefer to make contact themselves. If World Renew forwards a complaint, the Safeguarding and Complaints focal points will log the complaint and subsequently follow up regarding how the complaint is handled, and to ensure the complainant receives feedback from the partner on how the complaint is being addressed. It is the responsibility of a partner organisation to handle and respond to a complaint made against them. World Renew strongly encourages, and provides support to all partners to establish their own complaints mechanism. However, if a partner does not have an established complaints mechanism, the Safeguarding and Complaints Focal Point, in consultation with their Complaints Advisory Group, will decide whether or not World Renew will investigate the complaint.

5.7.7 Referral to a third party: In cases where the complaint contains issues that World Renew is unable to deal with, the complainant will be offered contact with a qualified third party. Specifically, in instances where reports are related to concerns over the safeguarding of children or vulnerable adults, but it is not a World Renew staff member involved, the concern must be referred to the appropriate authorities, or to other organisations with relevant expertise.

5.7.8 Support to parties involved in a complaint: The aim of handling complaints confidentially is to protect all parties involved, including the complainant, witnesses, the subject of the complaint, etc. World Renew is obliged to support individuals experiencing reprisal or unfair treatment as a result of being involved in the handling of a complaint. World Renew will investigate any negative consequences that the handling of the complaint may have caused for these individuals. World Renew will also do its utmost to attempt to resolve the problem in consultation with these individuals.

5.8 Disciplinary Action

If a complaint is substantiated, World Renew may, in accordance with relevant legislation, take internal disciplinary actions or if relevant report the incident to police. Such action may be taken against both staff and organisations depending on the nature of the problem, the results of the investigation and proposed measures. If a partner organisation has not fulfilled an undertaking, action may be taken under the applicable partner agreement. Action regarding World Renew's own staff may be taken under applicable labour law.

If it emerges that a partner's staff is in breach of the relevant code of conduct, World Renew will enter into dialogue with the partner and follow up on how they will manage this, up to and including the possible termination of the partnership.

5.9 Learning and Reporting

Safeguarding and Complaints Focal Points report at least annually to the Safeguarding and Complaints Coordinator at the Home Office, minimally on the number and types of complaints received. An annual complaints report is compiled by the Safeguarding and Complaints Coordinator which contains a global summary of the number and type of complaints received, along with information, where relevant, about how the complaint was handled and what lessons have been learned. Any confidential information, including personal data, is excluded. After approval from the senior management team, the annual complaints report is presented to the Board of Directors, as well as being made publically available.

5.10 Obligation to Report

All World Renew staff are required to report any knowledge, concerns or substantial suspicions of breaches of World Renew's Codes of Conduct, or related policies¹¹, following the procedures outlined in this policy. Failure to disclose or knowingly withhold information about any reports, concerns or substantial suspicions of breaches of the Code of Conduct and/or related policies, constitutes grounds for disciplinary action, up to and including discharge.

5.11 Whistleblowing (non-retaliation)

World Renew promotes an environment that enables and encourages all stakeholders to lodge concerns without fear of reprisals or unfair treatment. World Renew will not retaliate, harass and/or cause any negative consequences to employment or entitlements for a complainant as a result of raising a genuine concern. World Renew will also require its partners to do the same.

If the complainant is subject to any form of reprisal, harassment and/or negative risks including losing employment or benefits, World Renew will deal with this within the scope of the applicable procedure.

¹¹ Related policies include, but are not limited to, the Child Safeguarding Policy, Code of Conduct Policy, the Vulnerable Adults Policy and the Prevention of Sexual Exploitation and Abuse Policy.

5.12 Confidentiality

Confidentiality is a critical principle to satisfactory complaints handling as it protects the privacy and safety of the complainant, the subject of the complaint and other witnesses. The facts and nature of the complaint, the identities of those involved and investigation records and documentation are confidential and are only shared on a need-to-know basis, or as otherwise required by law.

Any staff member involved in handling and/or investigating a complaint will be subject to confidentiality and will be required to sign an Oath of Confidentiality. Any individuals involved in an investigation who are not staff members of World Renew will be requested to sign an Oath of Confidentiality. Refusal of these individuals to sign the Oath, may lead to her/him not being involved in the investigation.

Deviations from confidentiality and/or the Oath may result in disciplinary action, with the exception of the following:

- it is required by law;
- it is required by management in the best interests of the organisation and the parties involved;
- it relates to a complaint that is a breach of national and/or international law;
- it is required in order to obtain specialist help in sensitive cases.

World Renew staff involved in handling complaints must not release confidential details about any complaint. Should a complaint or investigation become public at any time, World Renew's Co-Directors may choose to issue a public statement about the procedures followed and the status and/or the outcome of the complaint that is being managed.

Information received electronically, including the Complaints Log, will be saved in electronic folders which have limited access and are password protected. Any paper records are kept in a folder and secured in a locked cabinet which can be accessed only by the relevant staff authorised to handle the complaint.

6. MONITORING AND REVIEW

This Policy will be reviewed every three years and updated as required, based on lessons learned from implementation of the policy and on any relevant contextual changes.

7. KEY TERMS AND DEFINITIONS¹²

Anonymous complaint: A complainant submits a complaint without revealing their identity.

CHS: Core Humanitarian Standard on Quality and Accountability.

Complainant: the person making the complaint, including the alleged survivor of the misconduct, or another person who becomes aware of possible misconduct.

Complaint: A complaint is a specific grievance of anyone who has been negatively affected by the work of World Renew or their partner, or who considers that World Renew has not fulfilled a stated commitment or is in breach of a World Renew Policy. This includes staff behaviour in relation to the World Renew Codes of Conduct. World Renew will handle complaints in a fair, appropriate and prompt manner. A complaint necessitates a response.

Complaints Advisory Groups (CAG): These are established in each operational context where a Safeguarding and Complaints Focal Point is in place. The complaints advisory groups are responsible for advising the safeguarding and complaints focal points on how to handle complaints in line with World Renew's Complaints Policy and Complaints Handling and Investigation Guidelines.

Complaints Handling Committee (CHC): This is established at the Home Office level in support of the work of the Safeguarding and Complaints Coordinator. The Complaints Handling Committee (CHC) is responsible for providing advice supporting the management of, and decisions related to, complaints handling for all complaints received at the Home Office level. The CHC also has responsibility for supporting the management of all investigations into complaints, whether originating from the home office or having been referred from Complaints Advisory Groups or Safeguarding and Complaints Focal Points across the organisation.

Concern: A "concern" is when there is an issue related to the safeguarding of a child or vulnerable adult which is not as a result of the behaviour of World Renew staff or partner staff behaviour, and therefore does not result in a 'complaint' against that staff. Instead, a concern must be reported so that appropriate referral or action can be taken in the best interests of the child or vulnerable adult.

¹² World Renew commits to complying with its applicable statutory and legislative obligations. Accordingly, the specific definitions, terms or concepts used in this policy are for reference purposes only. If necessary, the applicable state, provincial or federal definitions mandated by the appropriate jurisdiction where an employee is employed, will take precedence and/or will supersede the definitions outlined in this policy.

Confidentiality: the facts and nature of the complaint, the identities of those involved and investigation records and documentation are confidential and are only shared on a need-to-know basis, or as otherwise required by law.

Feedback: a positive or negative opinion or information by a stakeholder about World Renew in order to improve or express satisfaction with our activities and/or processes. When feedback is given, there is no intention of submitting a formal complaint. Feedback is welcomed but requires no formal response.

Hearing Committee: The Hearing Committee is composed of the members of the Complaints Handling Committee plus one person from a third party. The Hearing Committee will make a decision on the outcome of the investigation based on analysis of the context, the investigation findings and the investigation report.

Investigation: a systematic process through which information is gathered that attempts to prove or disprove an allegation(s).

Malicious complaint: an accusation deliberately made on false grounds with the aim of causing harm to another individual, an organisation, or of promoting one's own goal or agenda.

Partner: an organisation that World Renew enters into Partnership agreements with to collaborate on a mutually agreed action.

Subject of complaint (SoC): the person alleged to have perpetrated the misconduct in the complaint.

Witness: a person who gives testimony or evidence in the investigation, including the survivor, the complainant, the subject of the complaint, staff member of a partner organisation, another staff member, expert witnesses or other person.

World Renew Staff: Refers to all World Renew staff, volunteers, consultants, exposure visit participants, contractors and fieldworkers.

Annex 1: Sample complaints letter form

Please complete (or adapt as necessary) this form and submit to your nearest designated Safeguarding and Complaints Focal Point.

Alternatively, please complete (or adapt as necessary) this form and send by e-mail to: complaints@worldrenew.net.

All complaints related to fraud, corruption, sexual exploitation and abuse, discriminatory treatment and other forms of misconduct will be held securely and handled strictly in line with applicable confidentiality, reporting and investigation procedures.

A: General information

1. Name of person and/or organisation making the complaint:

Sex: _____ Age: _____

2. Address/email: _____ Tel: _____

B: Description of complaint/problem

3. Name of person, organisation and/or project that the complaint refers to:

4. Date of incident/problem: _____ Time of incident: _____

5. Place of incident: _____

6. Brief description of the incident or concern

C. Name of witnesses (if relevant) and how they can be contacted if known:

D: Describe any action taken. Please include information concerning whether this complaint has been lodged with other organisations and any action taken, any medical assistance or psychosocial care that has been provided and whether a report has been made to the police, if relevant.

E: Third party referral: Please state if you consider there is a need for referral, for example to provide some form of medical, psychosocial or legal support for the individuals involved

F: State what kind of response you expect from World Renew and how you wish the matter to be resolved.

Name: _____

Signature: _____

Date: _____