



Complaints Handling and Investigation Guidelines

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World Renew welcomes feedback on this document, as well as accompanying annexes and forms. Feedback can be provided by contacting the Safeguarding and Complaints Coordinator. Please be as specific as possible in your feedback, with concrete suggestions for improvement. Feedback received will be used as part of the ongoing process of improving World Renew's complaints handling processes.

The photos used in this publication have been taken in the course of World Renew and her partner's work in 27 countries.

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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.



Ephesians 5:8-11

"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."

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."

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.

These guidelines for handling complaints seek to create structures that will 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.

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.

These guidelines directly support the implementation of the World Renew Complaints Policy, in addition to a number of other 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.

These guidelines are useful for all staff but are particularly intended to support the work of those who have key responsibilities in ensuring the effective implementation of the complaints mechanism:

- the Safeguarding and Complaints Coordinator.
- the Safeguarding and Complaints Focal Points.
- members of the Complaints Handling Committee.
- members of Complaints Advisory Groups.
- ministry team leaders.
- co-directors.

For key terms and definitions used throughout these guidelines – please refer to Annex 13.

2. Key Responsibilities

2.1 All Staff

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 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 the Home Office, and to explain the complaints procedures as outlined on the World Renew website.

In order to achieve this, World Renew commits to ensuring that all staff are equipped to do this. This can be achieved through a variety of means, such as ensuring new staff read the Complaints Policy as part of their orientation; providing induction sessions to new staff on key policies including the complaints policy, providing regular staff training sessions on the key components of the complaints policy, issuing regular communications about the complaints mechanism and making sure that the information about how to complain, etc. is easily accessible, for example through a dedicated page on the website.

2.2 Safeguarding and Complaints Coordinator

The role of the Safeguarding and Complaints Coordinator is established at the Home Office of World Renew at a minimum grade level of 12. It is anticipated to be a full time role (1FTE).

The overall responsibility of the Safeguarding and Complaints Coordinator is to support the organisation to comply with the World Renew Complaints Policy, with a focus on handling complaints at the home office level, building and strengthening capacity on complaints handling throughout the organisation, supporting safeguarding and complaints focal points in their role, handling investigations and reporting on complaints.

Specifically, World Renew's Safeguarding and Complaints Coordinator is responsible for monitoring and proposing revisions to the Complaints Policy and to these guidelines, as well as internal information sharing of the content and provision of support and capacity building to designated Safeguarding and Complaints 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 these guidelines and that relevant reporting and learning on complaints is undertaken. The

Safeguarding and Complaints Coordinator is also responsible for handling all investigations with the support of the Complaints Handling Committee.

For a more detailed breakdown of the responsibilities of the Safeguarding and Complaints Coordinator see the Terms of Reference provided in **Annex 1**.

2.3 Complaints Handling Committee (CHC)

The Complaints Handling Committee 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, 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. (For a more detailed breakdown of the responsibilities of the Complaints Handling Committee, see the Terms of Reference provided in **Annex 2**).

Coordination of the Complaints Handling Committee is provided by the Safeguarding and Complaints

Coordinator. The Complaints Handling Committee is responsible for management, advice and decisions on complaints. The Committee shall assess the nature of each complaint presented by the Safeguarding and Complaints Coordinator and make decisions on how to proceed. The Committee may decide to delegate feedback or complaints to relevant staff members to follow up, depending on the project, partner or issue in question. The Complaints Handling Committee must always be informed of complaints related to a breach of the World Renew Codes of Conduct. The Complaints Handling Committee must also always be informed of any request for an investigation as a result of a complaint. All investigations are coordinated at the home office level by the Safeguarding and Complaints Focal Point, with the advice and guidance of the Complaints Handling Committee.



The quorum for the Committee is three persons, of whom the Co-Director must always be present when dealing with complaints related to a breach of the World Renew Codes of Conduct.

The Complaints Handling Committee is composed of the following members:

- **at least one of the Co-Directors;**
- **the Safeguarding and Complaints Coordinator;**
- **person(s) from World Renew leadership who have technical expertise in complaints handling, including expertise in Human Resource; and,**
- **other senior staff with specific and relevant expertise depending on the type of complaint being handled.**

The Complaints Handling Committee can, when deemed necessary, co-opt a temporary committee member with the relevant expertise to manage a specific complaint and/or investigation. In addition, the Committee may co-opt an individual(s) to join the Committee when managing a complaint(s) that requires specific expertise.

Complaints Handling Committee members are endorsed by CPAC. If there is a conflict of interest that makes it inappropriate for a Complaints Handling Committee member to participate in the review of a particular complaint, an alternative

committee member can be sought.

2.4 Ministry Team Leaders

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 programme, country or regional level. This is done in consultation with the Safeguarding and Complaints Coordinator at Home Office level.

A key responsibility is to appoint Safeguarding and Complaints Focal Points in different operational contexts to support the implementation of the Complaints Policy at a programming level. Appointing a Safeguarding and Complaints Focal Point at the regional level would support all operational areas where there is a limited country level structure. In cases where there is a strong Country Office, the Ministry Team Leader can delegate to the Country Consultant/Director to appoint the Safeguarding and Complaints Focal Points in that country.

2.5 Safeguarding and Complaints Focal Points

The role of a Safeguarding and Complaints Focal Point is established in all regions, at either a programme, country or regional level, depending on

the operational context (number of programmes, number of offices, number of World Renew Staff, etc.) in each World Renew programming location. It is a part time role that on average can be expected to take half a day per week (that is, 0.1 FTE) with certain periods being busier than others throughout the year, depending on the types of complaints that are received. It is advised to combine this with another role that enables flexibility throughout the year to handle peaks and troughs of workload related to complaints handling.

The overall responsibility of a Safeguarding and Complaints Focal Point is to support the administrative function of the established complaints mechanisms in their designated area, with a focus on handling incoming complaints in coordination with the relevant complaints advisory group, escalating all complaints that require investigations to the Safeguarding and Complaints Coordinator in the Home Office and regularly reporting on number and types of complaints received. In this work, the Focal Point is assured of the full confidence and support of the organisation and the Co-Directors.

Specifically, at a programme, country or regional level, World Renew's Safeguarding and Complaints Focal Points are responsible for receiving all complaints and ensuring that complaints are managed according to policy and in reference to these

guidelines. 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 relevant senior management team on the complaints received. Safeguarding and Complaints Focal Points are also responsible for reporting quarterly to the Safeguarding and Complaints Coordinator at the Home Office.

For a more detailed breakdown of the responsibilities of a safeguarding and complaints focal point, please refer to the Terms of Reference provided in **Annex 3**.

2.6 Complaints Advisory Groups (CAG)

Complaints Advisory Groups are established minimally at a regional level and additionally at a country or even programme level, if appropriate. Each Safeguarding and Complaints Focal Point is linked with a specific Complaints Advisory Group. Some Complaints Advisory Groups may have more than one Safeguarding and Complaints Focal Point linked to them. 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 Guidelines. For a more detailed breakdown of the responsibilities of a Complaints Advisory Group, please refer to the Terms of Reference provided in **Annex 4**.

Complaints Advisory Groups should be composed of a minimum of 3 people including:

- a safeguarding and complaints focal point;
- a senior member of staff (this could be the Ministry Team Leader at the regional level, or the Country Consultant/Director at a country level or the Programme/Project Manager at a Programme/Project level); and,
- other staff with relevant technical expertise or experience/trained in handling complaints.

The Complaints Advisory Groups can, when deemed necessary, co-opt a temporary member with the relevant expertise to manage a specific complaint(s) that requires specific expertise (for example, finance, HR etc).

The Complaints Advisory Groups do not need to meet face to face. The complaints mechanism needs to be timely and responsive to complaints received, and often using methodologies such as group email discussions or conference calls, as needed, will work better than attempting to schedule face to face meetings. Where appropriate face to face meetings can also be utilized. Meetings do not need to be scheduled regularly, but rather the Complaints Advisory Groups should be responsive to the requests for advice or guidance from the Safeguarding and Complaints Focal Point.

2.7 Co-Directors and Senior Management Team (CPAC)

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.

The Co-Directors also play a key role in hearing an appeal, if a Complainant or the Subject of Complaint disagrees with the outcome of an investigation and chooses to appeal the decision. Following the appeal process, the Co-Directors' decision is final.

The Senior Management Team (CPAC) is responsible for receiving the Annual Complaints Reports from the Safeguarding and Complaints Coordinator and approving them, prior to them being presented to the Board of Directors and then being made

publicly available on the website.

2.8 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 agreements¹ with its partners on processes and routines for how complaints are to be handled within the partnership including acceptance of the outcomes of an investigation. 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

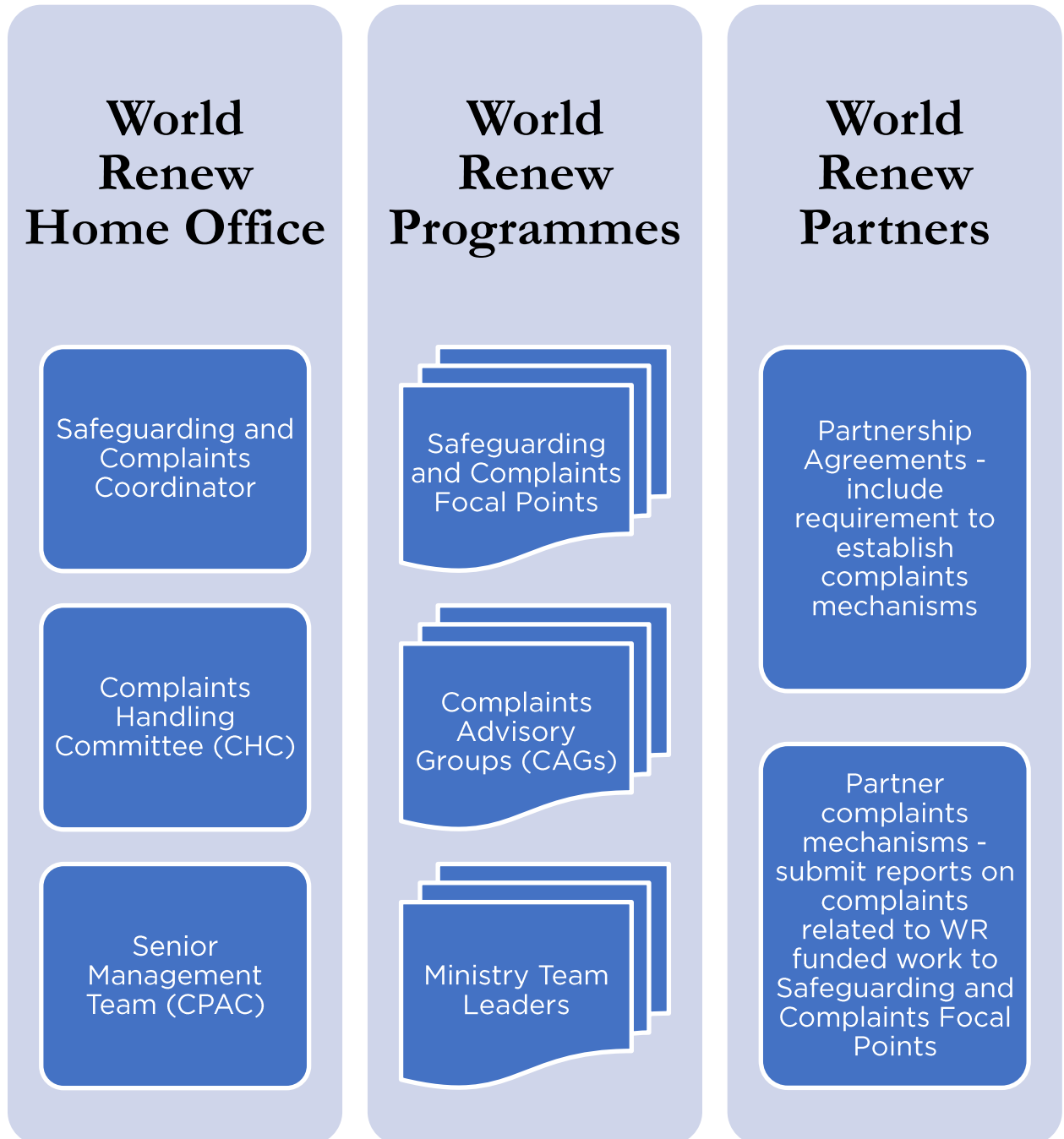
to handle and respond to the complaints made against them in a manner that is accessible and appropriate for the local context². An accessible and appropriate complaints mechanism, designed in consultation with key stakeholders, includes ensuring stakeholders can complain and that they are informed about 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.

Partners should report, on a quarterly basis, to their designated World Renew Safeguarding and Complaints Focal Point any complaints related to World Renew funded work. If the complaint relates to a breach of Policy or Code of Conduct by World Renew staff, it should immediately be referred to the Focal Point, or directly to the Safeguarding and Complaints Coordinator, for handling through the World Renew Complaints Mechanism.

¹ This does not need to be a separate agreement but can be incorporated into the existing Partner MOUs or Partnership Agreements.

² An accessible and appropriate complaints mechanism is developed through consultations with stakeholders on the design, implementation and monitoring of complaints.

Figure 1: Key roles and structures in the World Renew Complaints Mechanism



3. Establishing a Complaints Mechanism

Each World Renew Ministry Team or Country Office establishes a Complaints Mechanism for their operational context that complies with the World Renew Complaints Policy and with reference to these guidelines. The specific complaints mechanism established shall be simple, easily understood and widely publicised, as well as contextualised to reflect the input of the communities it is designed to serve. The complaints procedures shall be translated into the national language and information and awareness shall be disseminated to the communities and affected populations with whom World Renew and our partners work.

3.1 Regional Level Complaints Mechanism

A regional level complaints mechanism is established in a region when:

- there are one or more operating contexts in one or more countries in the region where World Renew does not have a Country Office.

A regional level complaints mechanism minimally consists of the following persons and elements:

- **a Regional Safeguarding and Complaints Focal Point** who reports to the Ministry Team Leader and links directly to the

Complaints and Safeguarding Coordinator at Home Office.

- **a Complaints Advisory Group.**
- **links between** the regional safeguarding and complaints focal point and the project or programme level complaints mechanisms established for the time period of the project or programme in contexts where there is no Country Office.
- **handles complaints** related to staff and partners in the region and any project/programme specific complaints that have been escalated by the relevant project/programme Safeguarding and Complaints Focal Point.
- **process for** collating information about the complaints received by the Regional Safeguarding and Complaints Focal Point and reporting them directly to the Safeguarding and Complaints Coordinator at the Home Office.

3.2 Country Office Complaints Mechanism

A country office complaints mechanism is established when:

- there is a World Renew Country Office present.

A country office complaints mechanism handles complaints related to staff and partners in the country and any project/programme specific complaints that have been escalated by the relevant project/programme

Safeguarding and Complaints Focal Point in the country. It consists minimally of the following persons and elements:

- **a Safeguarding and Complaints Focal Point** who reports to the Country Consultant/Director and links directly to the Complaints and Safeguarding Coordinator at Home Office.
- **a Complaints Advisory Group.**
- **links between** the safeguarding and complaints focal point and the project/programme level complaints mechanisms established for the time period of the project/programme.
- **a process for** collating information about the complaints received by the Country level Safeguarding and Complaints Focal Point and reporting them directly to the Safeguarding and Complaints Coordinator at the Home Office.



3.3 Programme Level Complaints Mechanism

A programme level complaints mechanism is time bound and should be established when:

- there is a World Renew implemented programme in a country where the duration is significant (i.e. 3 years or longer) and/or the budget is significant (i.e. USD750,000 or more) and the benefits of coordinating the complaints mechanism at a programme level, rather than at individual project level justify a programme level complaints mechanism.

A programme level complaints mechanism handles complaints related to staff and partners working on the programme and any project specific complaints that have been escalated by the relevant project based complaints focal points. It consists minimally of the following persons and elements:

- **a Safeguarding and Complaints Focal Point** who reports to the Programme Manager and links directly to the Country Office Complaints and Safeguarding Focal Point, or in cases where there are no Country Offices, directly to the Regional Safeguarding and Complaints Focal Point
- **a Complaints Advisory Group** at the programme level

- **links between** the programme level safeguarding and complaints focal point and any project level complaints mechanisms established within the scope of the programme
- **a process for** collating information about the complaints received by the programme level Safeguarding and Complaints Focal Point and reporting them directly to the Safeguarding and Complaints Coordinator at the Home Office.

3.4 Project Level Complaints Mechanism

A project level complaints mechanism should be time bound and established when:

- there is a World Renew implemented project.

A project level complaints mechanism minimally consists of:

- a documented and well-communicated process for handling complaints about abuse of power by project staff (including sexual exploitation and abuse) and programmatic complaints and feedback related to the project that is safe and accessible for communities to access.

The communities should be consulted on the design, implementation and monitoring of the complaints handling process to ensure it is fit for the purpose.

Additionally, some project level complaints mechanisms may also appoint:

- **a Safeguarding and Complaints Focal Point** who reports to the Project Manager and links directly to either the programme or the Country Office Complaints and Safeguarding Focal Point, or in cases where there are no Country Offices, directly to the Regional Safeguarding and Complaints Focal Point
- **a Complaints Advisory Group** at the project level
- **a process for** collating information about the complaints received by the Project level Safeguarding and Complaints Focal Point and reporting them directly to the Safeguarding and Complaints Coordinator at the Home Office.



3.5 Partner Level Complaints Mechanism for Projects

A partner level complaints mechanism for projects should be time bound and established when

- there is a World Renew funded project that is being implemented by one or more partners.

A partner level complaints mechanism for projects minimally consists of:

- **reference to** the establishment of the complaints mechanism in the Partnership Agreement
- **a documented and well-communicated process** for handling complaints about abuse of power by project staff (including sexual exploitation and abuse) and programmatic complaints and feedback related to the project that is safe and accessible for communities to access.

The communities should be consulted on the design, implementation and monitoring of the complaints handling process to ensure it is fit for purpose.

Additionally, some partner level complaints mechanisms may also appoint the following persons:

- **a Safeguarding and Complaints Focal Point** who reports to the Project Manager and links directly to either the programme or the Country Office Complaints and Safeguarding Focal Point, or in cases where there are no Country Offices, directly to the Regional Safeguarding and Complaints Focal Point.
- **a Complaints Advisory Group** at the project level.

3.6 Key steps in developing a complaints response mechanism³

3.6.1 Commit to the process

Ensure that the establishment of a Complaints Mechanism is supported by senior management and that appropriate resources, including human and financial, are devoted to this purpose.

3.6.2 Let 'end-users' decide what's best

Consult employees and women, men, girls and boys of different ages, backgrounds and diverse abilities, in programme locations regarding appropriate ways of making complaints. They are the ones who will be using the mechanism. Ask each group what they consider a safe way of giving feedback or complaining; what currently works well; what

³ Adapted from the ACT Alliance Complaints Handling and Investigation Guidelines (2010)
<https://actalliance.org/documents/act-alliance-complaints-and-investigation-guidelines/>

doesn't work well; and provide a variety of ways for people to give feedback or complain. Many existing complaint mechanisms are inaccessible to specific groups. Ensure that the mechanism you develop is not one of them.

3.6.3 Design the complaints procedures

Based on the feedback from the local population and staff, design and establish the complaints handling procedures. Make sure that all complaints mechanisms have the names and contact details of at least two persons (one female, one male), where possible. Contact details should include, where applicable, telephone and fax number, email address, office address, and postal address to increase options for submission of complaint. Always remember that the design of a complaints mechanism must cater for the needs of the people for which they were intended, particularly the most at risk in the population.

Box 1: Examples of complaints mechanisms in communities

- Complaints boxes positioned in safe, confidential and accessible locations
- Local gender-sensitive Complaints Committees who are trained in addressing complaints fairly and effectively.
- Well-known and trusted community focal points such as protection officers and health workers;
- Youth focus groups in community centres and schools
- Free phone lines in 'safe' locations that can be accessed by all people

Box 2: Examples of information sharing

- Posting notice boards in project offices, camps and hospitals with information about the organisation, its programme, its code of conduct (specifically World Renew's commitments on the prevention of sexual exploitation and abuse) and protection issues, in local languages.
- Providing information to affected communities verbally (in person and using megaphones).
- Disseminating leaflets and A4 size posters to all communities during distributions or project implementation with information about the organisation, the humanitarian and development plans and protection information – local languages.
- Involving affected communities in identifying ways to share information and have them develop the materials (i.e. through songs, pictures, etc).
- Meeting with local committees to provide information about the organisation and its humanitarian and development plans and to seeking their suggestions and comments on how to resolve problems as they arise.
- A Village Information Board where information is displayed about World Renew's operations and key policies, including contact details of project staff or complaints focal points.
- Information boards inside and outside World Renew project offices in local languages.
- Poster depicting that Sexual Exploitation and Abuse and Gender Based Violence (put in simple language) is wrong.
- Information on where they can find safety in the event of SEA.
- The establishment of community information centres which also serve for other purposes, such as internet, public meetings, etc.
- Community focus group meetings (women, girls, men, boys, people with learning, intellectual or physical disabilities, older men and women).
- School visits by project staff and drama's or games to inform children of their rights.

3.6.4 Build the capacity of safeguarding and complaints focal points and staff

Focal points and staff may require strengthened capacity in the following areas:

- **consulting with communities** on the design of the complaints mechanism that best suits their context
- **knowing what information** should be shared at a minimum with communities on their rights and entitlements, and the most effective ways of sharing it (see **Box 2** for examples)
- **practice in how to** appropriately disseminate World Renew policies, especially the Complaints Policy, 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 amongst all staff.
- **how to recognise** barriers to making complaints
- **how to support** people in making a complaint and good practice in receiving a complaint directly from a member of the community
- **what to do** when they receive complaints in general (recording, confidentiality, action, etc.)
- **what to do** when the complaint is on Sexual Exploitation and Abuse (SEA)
- **the processes and procedures** involved in the complaints investigation phase and, finally,

how to address investigation recommendations and follow-up.

3.6.5 Enable communities to complain:

Staff should make sure that the communities within their programme reach are aware of their rights and the mechanisms available to enforce them. This will include the need to share information on the following issues:

- details about the World Renew and its partners operating in the area and their programmes
- the community's rights as well as the project entitlements and mechanisms that are in place to enforce them
- details about the expected behaviour of project staff, as per the Code of Conduct, and in particular World Renew's commitments on the prevention of sexual exploitation and abuse.

Ideally staff should facilitate the dissemination of the locally-adapted complaints procedures within the communities and in languages and communication media that are accessible to the women, men, girls and boys of all ages and to people with disabilities.

4. Handling a Complaint

4.1 Receive the Complaint

All staff should feel equipped to welcome complaints and, when an issue can not be resolved informally, to either refer the complainant to the relevant Safeguarding and Complaints Focal Point or support the complainant to make a complaint through an established mechanism. Staff should not attempt to try and investigate or resolve a formal complaint by themselves. Complaints should always be referred to a safeguarding and complaints focal point or to the Safeguarding and Complaints Coordinator.

While all complaints must be dealt with effectively and efficiently, those that relate to Sexual Exploitation and Abuse must be addressed as a matter of urgency, given the potential medical implications. A medical referral should be made within 72 hours if necessary.

4.2 Review the Complaint

All complaints received must be thoroughly reviewed as soon as possible after receipt (if possible, in less than three days, but no later than five business days (one week)).

As soon as information is received through the complaints mechanism, the person receiving it (Safeguarding and Complaints Focal Point or the Safeguarding and Complaints

Coordinator) should make an initial assessment of what type of information it is – as that will impact on the course of action to be taken.

The complaints mechanisms that are established have the possibility of receiving many different types of information for different purposes. This is intentional so as not to create multiple parallel systems. Instead there is one key entry point to make it easier for stakeholders, and then the decision is taken by World Renew on whether it is a complaint or not and what direction it should follow.

Essentially there are four possible types of information that come into the complaints system:

1. Feedback
2. Concern
3. Complaint
4. Out of scope

Each of these four types of information has its own defining characteristics as well as its own defined pathways to follow for handling it. These are summarised in **Figure 2**.

4.3 Logging the Issue

A confidential file should be kept by all Safeguarding and Complaints Focal Points, and the Safeguarding and Complaints Coordinator (for Home Office level Complaints), that logs all issues received by them through the complaints mechanism.

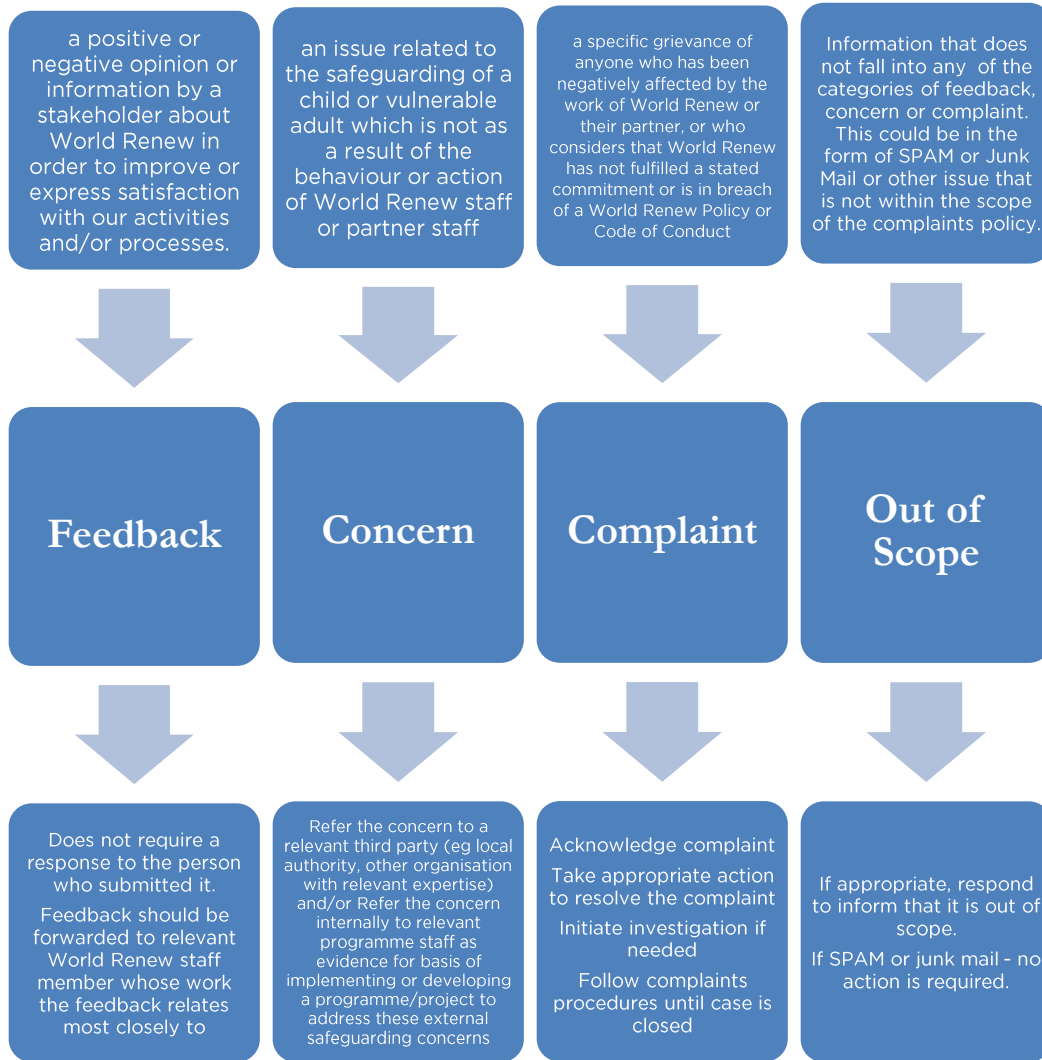
This log helps to track the status of each issue as well as clearly identifying what type of issue it is (feedback, complaint, concern etc.). It also allows to monitor the time taken to acknowledge complaints and clearly identifies when a case is closed. It also provides the opportunity to note down any key lessons learned, and therefore

serves as a helpful tool for reporting.

A sample format of what a Complaints Log could look like is provided in **Annex 5**.



Figure 2: Assessing what type of information has come into the complaints mechanism



4.4 Handling Feedback

The Safeguarding and Complaints Focal Point may independently, or with the guidance of the Complaints Advisory Group, assess that an issue received does not qualify as a complaint according to the Complaints Policy, but is rather feedback. Feedback is a positive or negative opinion or information by a stakeholder about World Renew submitted in order to improve or express satisfaction with our activities and/or processes.

In such cases, the Focal Point can simply forward the feedback to the relevant World Renew Staff member whose work the feedback most closely relates to. In order to receive the recognition for positive feedback, and to learn from negative feedback, the staff member's direct supervisor should also be copied.

There is no need to formally respond to feedback, but the issue should be logged in the Complaints Handling log (see **Annex 5**). This enables a picture to be built up over time, as a series of negative feedback on the same issue may indicate that something more serious is occurring that may warrant a complaint or other appropriate action to be taken.

Once the feedback has been forwarded and logged, the case is closed, and no further action is required. See **Figure 3** for a summary of this process.

4.5 Handling an External Safeguarding Concern

The Safeguarding and Complaints Focal Point may independently, or with the guidance of the Complaints Advisory Group, assess that an issue received does not qualify as a complaint according to the Complaints Policy, but is rather an external safeguarding concern. A concern is understood to be an issue related to the safeguarding of a child or vulnerable adult which is not as a result of the behaviour or action of World Renew staff or partner staff. Instead it is a concern raised due to the external context but, for the protection of the child or vulnerable adult, needs to be reported to the appropriate authorities.

In such cases, the Focal Point needs to refer the concern to the relevant authority or to another organisation with the relevant expertise. If, in that context, World Renew has its own programmes that address such issues (for example, a Child Protection Programme), then the information can also be referred to the relevant programme staff. It is important that each Safeguarding and Complaints Focal Point has a local, contextualised list of relevant contacts to support such referrals. For example, local authorities (such as police or social services) or a list of organisations specialized in working on child protection issues, etc.

There is no need to formally respond to such concerns, but the issue should

be logged in the Complaints Handling log (see **Annex 5**). This enables a picture to be built up over time, as a series of concerns on the same issue may provide evidence for a need for further action, for example raising funds for a programming intervention that would address the external safeguarding issue at its root cause.

Once the external concern has been referred, as appropriate, and logged, the case is closed, and no further action is required. See **Figure 3** for a summary of this process.

4.6 Handling a Complaint

If the information that has been received through the complaints mechanism is assessed to be a complaint, an acknowledgement of receipt of the complaint should be sent to the complainant within a maximum of 5 business days. Ideally it should be earlier than this, for example, within three days. More time is allowed under the policy for cases where the safeguarding and complaints focal points are travelling without access to the complaints. However, the principle is that a complaint should be acknowledged as soon as possible.

If the complaint alleges sexual abuse, a medical referral should be provided immediately (within 72 hours). See **Box 3** below for further information.

Within two weeks, further information is provided to the complainant including at a minimum these elements:

- **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.**
- **how World Renew has responded to the complaint so far and what it will do next.**

Within two weeks, further information is provided to the complainant including at a minimum these elements

If a letter is deemed an inappropriate or insecure means of communication, confirmation can be given in person in a discrete way that does not put the complainant at risk. If both options are not safe for the complainant, it is advisable to keep the confirmation letter in the complaints file.

The Focal Point should find out whether the complainant, subject of complaint or other witnesses are immediately or potentially at risk.

Risks should be prioritised, and any security concerns should be referred to a security focal point or senior manager. Adequate and rapid protection and security measures must be provided to the person initiating the complaint, to ensure that he/she is protected from any possible reprisals. Medical concerns should be addressed as outlined below. See detailed guidance on investigations in **Section 5** below.

Box 3: Possible need for medical referral

- If the complaint alleges sexual abuse, urgent medical assistance and counselling must be made available to the complainant. If there is information to suggest that sexual activity has occurred within the past 72 hours, immediate referral for medical treatment should be carried out in order to maximise the effectiveness of emergency contraception or treatment to prevent HIV.
- Complainants of SEA should also be provided with full information and advice on existing legal means of redress, including contact addresses where claims may be filed and any network helping complainants to file claims, or which would provide other types of support.
- (BSO Investigation Learning Programme – Investigations Workshop)

A confidential file should be established for all serious complaints for the protection of all stakeholders involved in the complaints process. The facts and nature of the complaint, the identity of the complainant, subject of Complaint and other witnesses are confidential. All evidence gathered for an investigation, witness statements and the investigation report are all strictly confidential.

If, after seeking guidance from a Complaints Advisory Group, the decision is that it is a valid complaint but there is *no* need for a formal investigation, the Complaints Advisory Group, together with the Focal Point, decide on the appropriate course of action to resolve the complaint. This course of action is followed until the complaint is resolved. The complainant and the Subject of Complaint can then be informed of the outcome.

If, after seeking guidance from a Complaints Advisory Group, the decision is that it is a valid complaint and there *is* a need for a formal investigation (for example all allegations of a breach of the World Renew Codes of Conduct by a World Renew or Partner member of staff) then the case is **immediately** referred to the Safeguarding and Complaints Coordinator and the Complaints Handling Committee for them to handle at the Home Office level (see **Figure 3**).

The Safeguarding and Complaints Coordinator, with the support of the Complaints Handling Committee then

follows the investigation process as summarized in **Figure 4** and detailed further in **Section 5** of these guidelines.

Providing feedback, both to the complainant and the Subject of the Complaint, on the outcome of any complaint, whether it required a full investigation or not, is an important part of the process as it increases confidence in the complaints handling process and can help foster acceptance of the outcome. It is important to handle complaints, including providing feedback on the outcome of a complaint, in a manner that increases confidence in the investigatory process and acceptance of the outcome of an investigation, even in cases where the outcome is not what the complainant would have wished. See **Box 4** below and **Annex 6** for more guidance on how to provide feedback, particularly to complainants that are vulnerable.

Box 4: Good practice when handling complaints from vulnerable people

- Plain Language communication
- Written explanation of the principles and process of investigations
- Validating complainant's reactions to investigation outcomes
- Giving feedback on the outcome of the investigation in person

See Annex 6 for more details.

All complaints need to be logged (see **Annex 5**), including information of whether an investigation was required or not, as well as capturing any key lessons learned from handling each complaint.

4.7 Handling Other Information that is Out of Scope

It can be immediately obvious to the person receiving complaints that some information has come into the mechanism that is completely out of scope. For example, there could be SPAM emails in the email complaints inbox or requests to consider CVs from potential applicants as they submit to all available contact addresses on the website, or even junk mail put into physical complaints boxes. In such cases, the information can be discarded, and no further action is required.

In some cases, the Safeguarding and Complaints Focal Point may be unsure whether the issue received through the complaints mechanism is something that should be handled within the scope of the complaints policy. In such cases, the Safeguarding and Complaints Focal Point can seek the advice and guidance from their respective Complaints Advisory Group as to whether it is to be considered within the scope of the policy and guidelines or not.

If there is a genuine issue that has been communicated, such as a complaint against another organisation or an issue with employment conditions, the Complaints Advisory Group may conclude that it is “Out of Scope” for the World Renew Complaints Policy, however a response to the sender would be appropriate. In these cases, a simple response stating that it is out of scope and will not be looked into by World Renew’s complaints mechanism could be sufficient. Or if, appropriate, some advice guiding the sender on where they should be directing their communication (e.g. to the HR department if about terms of employment or to a different organisation if it relates to their work and not World Renew’s work). As the range of “Out of Scope” information received is so broad, some discretionary judgement will need to be taken by the Safeguarding and Complaints Focal Point, with the guidance of the Complaints Advisory Group if necessary, on whether a response is needed and what type of response to provide.

Out of Scope information does not need to be logged in the Complaints Log.

4.8 Handling Complaints when a Focal Point is Absent

In the event that a Safeguarding and

Complaints Focal Point, is absent from work for more than 2 days, a system needs to be in place to receive and acknowledge complaints in their absence.

If it is a planned absence (for example, vacation) the Safeguarding and Complaints Focal Point should ensure that someone else has been designated to take on this function. Most likely this could be someone from the relevant complaints advisory group but could also be the Safeguarding and Complaints Coordinator. Access would need to be given to the relevant email inbox and calls forwarded from relevant phone lines and physical complaints collected and passed to a designated replacement. If complaints come to a personal email address (not advised) then an “out of office” message needs to be set up to give clear indication of how the complaint can be submitted in the focal point’s absence.

If it is an unplanned absence (sick leave for example) then the Complaints Advisory Group would need to take responsibility for ensuring that someone can step into the focal point role and that complaints continue to be handled in a timely manner.

World Renew: Complaints Handling and Investigation Guidelines

Figure 3: Complaints Handling Process (See Chapter 4 for more details)

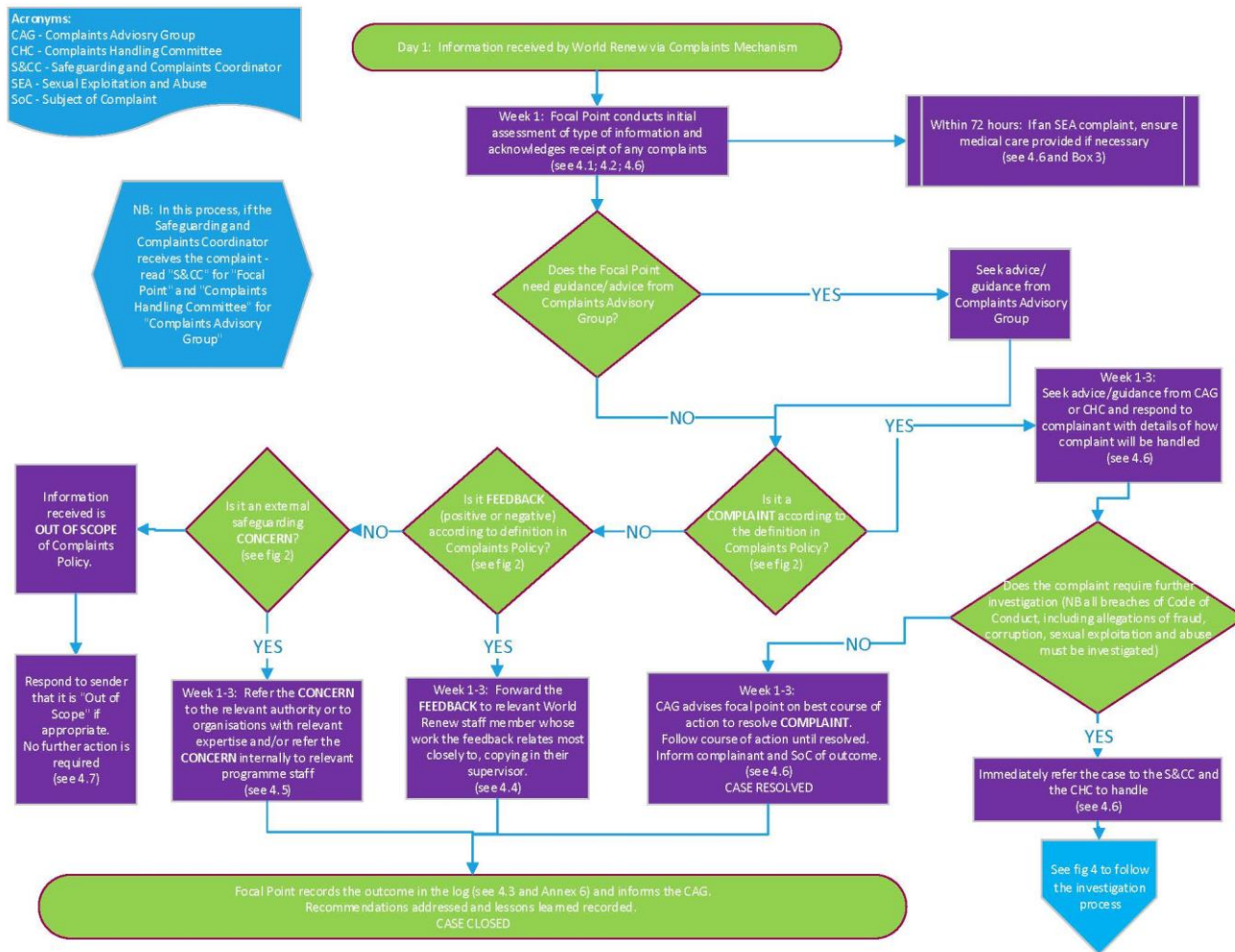
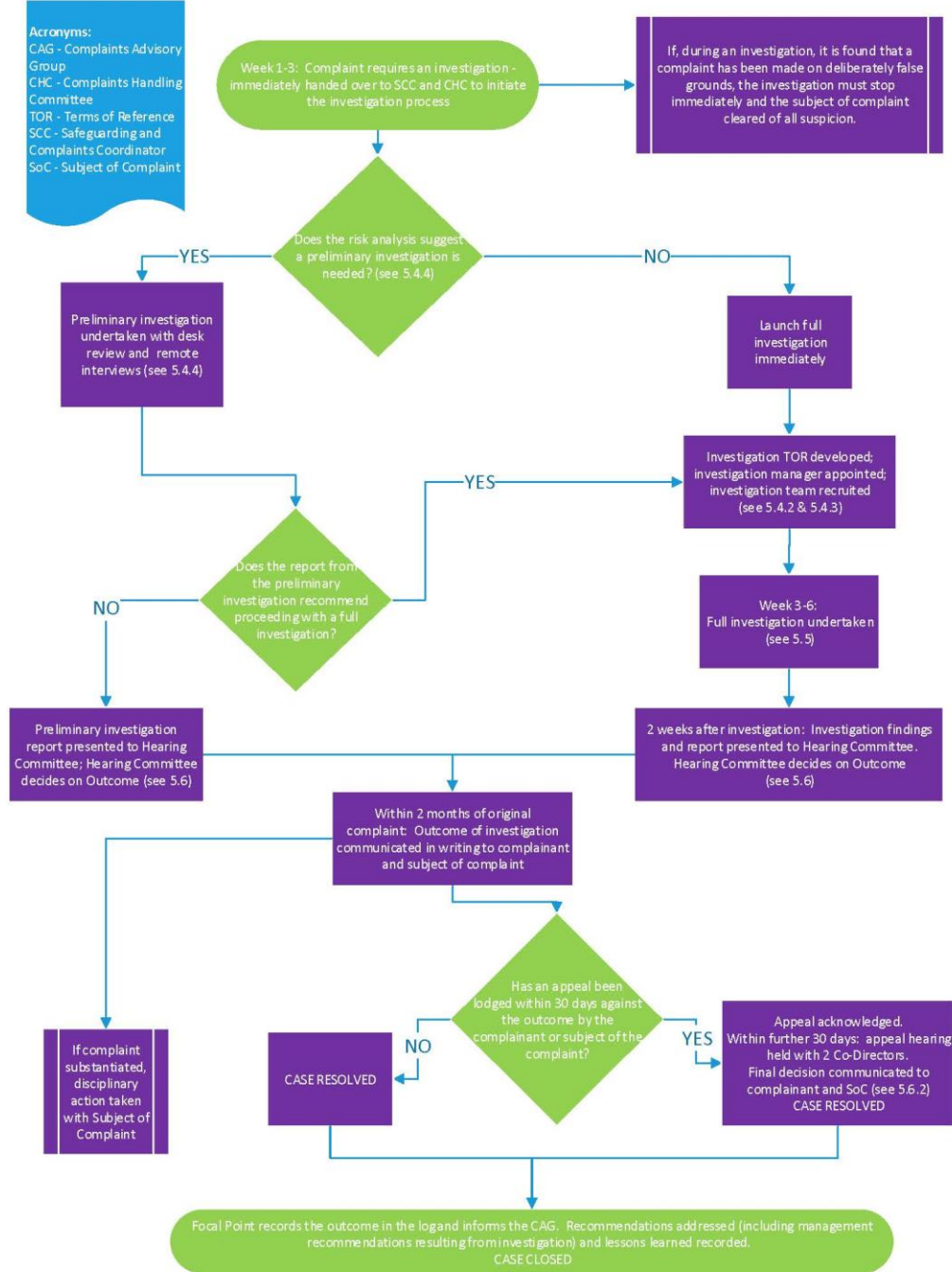


Figure 4: Investigation Process (see Chapter 5 for more details)



5. Investigating a Complaint⁴

Not all complaints or feedback 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.

5.1 Definition of 'Investigation'

For the purpose of these guidelines, World Renew defines the term 'investigation' as follows:

'Investigation' - a systematic process through which information is gathered that attempts to prove or disprove an allegation.

More specifically it:

- **determines the circumstances and background** of an allegation of

wrongdoing or misconduct.

- **establishes the facts** behind the allegation.
- **draws conclusions** on whether or not, on the available evidence, there has been a breach of the relevant standards of conduct or policy.
- **makes recommendations** to management for follow-up.



⁴ Adapted from the ACT Alliance Complaints Handling and Investigation Guidelines (2010) <https://actalliance.org/documents/act-alliance-complaints-and-investigation-guidelines/>

5.2 Core Principles for Investigations

Those who conduct investigations must be professionally responsible, qualified, independent and objective. Core principles for investigations should include the following traits.

Confidentiality: access to and dissemination of information should be restricted to a limited number of people. The confidentiality of the person(s) under investigation must also be respected. Information should only be shared on a 'need to know' basis.

Thoroughness and timeliness: investigations should be conducted in a comprehensive and timely manner, with a preliminary investigation outcome communicated in writing to the complainant within **60 days** of receipt of complaint.

Safety, health and welfare of all witnesses must be given due consideration throughout the investigation phase.

Respect: All stakeholders to the investigation must be treated with the utmost respect at all times before, during, and after the investigation. If the investigation is at the programme level, it does, of course, help when World Renew and its partners have already built up a strong partnership with local agencies and a respectful and trusted relationship with local communities.

Impartiality: investigations must be

conducted in a fair and equitable manner.

Accuracy: investigation findings and conclusions must be supported by accurate information.

Legality: It must be conducted in such a way that it is legally enforceable, demonstrating fairness and reason, and based on clear and convincing evidence.

Cultural awareness: The legalities and reactions of different societies have different implications for the treatment and protection (or lack thereof) of complainants, witnesses or the Subject of Complaint. Cultural sensitivities must be considered and factored into the investigation process.

5.3 Responsibility for Handling an Investigation

It is the responsibility of the Complaints Handling Committee, at the Home Office, coordinated by the Safeguarding and Complaints Focal Point, to handle all investigations. As soon as a Safeguarding and Complaints Focal Point, together with the advice and guidance of their Complaints Advisory Group, assess that a complaint requires further investigation, the case must be handed over immediately to the Complaints Handling Committee.

5.4 Planning an Investigation

5.4.1 Establishing an investigation file

If the Complaints Handling Committee has determined that there is a complaint that requires investigation, as a first step it must set up a confidential investigation file and establish an investigation team. An investigation file refers to any information compiled or maintained by World Renew with respect to an investigation into a complaint. To address World Renew's commitment to confidentiality in relation to complaints handling, and to protect witnesses, the following measures should be taken when maintaining a file.

- **Develop predetermined codes** for the complainant, survivor(s) if not the complainant, Subject of Complaint and other witnesses, e.g. Witness A, for the Complainant; and Subject A for the SoC, etc., and do not use their names on any witness statements (testimonies) or investigation reports. Keep all physical records related to the investigation in a locked cupboard or filing cabinet preferably in the Human Resource Manager or Director's office.
- **Keep all electronic records** related to the investigation in a password protected folder, with limited access to authorised personnel working on the case only.

- **The investigation team** should not take files out of the office and should not make copies of files. If copies of files have to be made for any reason, note the number of the copy on the file and destroy it when it is returned.
- **Documents** should not be shared with anyone outside the investigation team.

5.4.2 The investigation team

Prior to receiving a complaint, World Renew should predefine which people within (or outside) the organisation will be involved in conducting investigations of complaints. The team may differ depending on the topic and scope 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 routines, 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 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.

For each investigation, the Complaints Handling Committee will need to consider the size of the investigation team, their qualifications, gender, the Terms of Reference (see **Annex 7: Key components of Investigations Team ToR**), possible conflicts of interests, and the budget available. The correct composition of an investigative team is critical to the success of any formal investigation. Ideally, for an investigation into a complaint, the team should be composed of the following persons:

- An investigation manager
- Two investigators (one female, one male).

Managers must never be part of an investigation into their own actions or decisions or actions of their own staff.

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

Investigations Manager: The role of the investigation manager is to coordinate the response process, not to investigate. S/he should ensure that the investigators are properly trained for the job in hand, supervised and referred for emotional and psychological support following difficult investigations, when necessary.

Investigators: The role of the investigator(s) is to undertake the

investigation. Investigators must be professional, responsible, qualified (experienced in interviewing on the special theme of the case) and independent (have no material, personal or professional interest in the outcome of the complaint) and no personal or professional connection with any witnesses - especially the complainant and/or Subject of Complaint (SoC).



Box 5: Qualifications of investigations manager

Managers should be chosen on the basis of their integrity, understanding of sensitive issues such as Sexual Exploitation and Abuse or fraud and corruption issues, knowledge of human resource practice and ability to negotiate conflicting interpersonal and institutional interests.

Adapted from HAP/Building Safer Organisations Investigations Guidelines, pg. 16.

Box 6: Qualifications and skills of investigators

At minimum, investigators must be

- **Professional:** exercise sound judgment and exhibit skill
- **Responsible:** trustworthy, dependable and personally accountable for the decisions they take throughout the investigation
- **Qualified:** experienced in interviewing and (at least) trained in SEA investigations
- **Independent:** have no material, personal or professional interest in the outcome of the complaint and no personal or professional connection with any witnesses (especially the complainant and SOC)

Key skills required will depend on the issue being investigated. However, essential skills for all investigators are

- Good communication,
- interviewing,
- attention to detail,
- the ability to think strategically and to learn.
- Conflict resolution skills may be an added advantage on some occasions

Investigators should be extremely knowledgeable about the organisation's policies in relation to SEA, human resources and protection.

Adapted from HAP/Building Safer Organisations Investigations Guidelines, Pg. 17.

Independent Observer and

Independent investigator: If only one investigator is available, the investigation manager should also appoint an independent observer to sit in on interviews and provide the investigator with feedback. The observer may be someone with specific relevant expertise in the area of the complaint, for example a computer fraud expert, SEA counselor, lawyers with in-country legal expertise and specialists in interviewing children or people with disabilities.

If the SoC is a World Renew member of staff, employees are sometimes more open with an independent investigator, especially on sensitive issues. If the person being investigated is from senior management, it is critical to use external investigators who do not have an ongoing relationship with management.

Interpreters: Ideally, investigators should speak the same language as the witnesses (note that the SoC is considered a witness throughout the investigation). However, at times, an interpreter may be needed on the team. Interpreters should not be known to the complainant or Subject of Complaint. S/he must understand the nuances of witnesses' language, including local slang and veiled allusions to sex in the case of Sexual Exploitation and Abuse (SEA)

investigations⁵.

Interpreters must sign an Oath of Confidentiality and must only translate what the witness says (see **Annex 8: Sample Oath of Confidentiality**).

Other experts: External experts may be required on the team in special cases, such as specialists on SEA, finance expert, experts on child interviewing, among others.

Box 7: Advice on SEA investigation

It is advisable to use specially trained and skilled investigators for investigations into Sexual Exploitation and Abuse, given the sensitive, specialised and often traumatic nature of such investigations for both the complainant and the Subject of Complaint. The appointment of expert investigators for sensitive child interviews and for interviews with witnesses' who fear authorities, or those who have learning or intellectual disabilities is also advisable.

5.4.3 Roles and responsibilities

The investigation team's terms of reference must clearly define the roles and responsibilities for each investigation team member (See **Annex 9: Sample Roles and Responsibilities of Investigation Team**). While broad roles and responsibilities can be in place prior to any

investigation, they will need to be adapted depending on the topic being investigated.

The investigation manager reports to the Complaints Handling Committee on a 'need to know' basis. The choice of person for this role will depend on the theme of the complaint. For example, World Renew's Chief Financial Officer could be the investigation manager in any fraud or corruption investigation, unless s/he was implicated in the case; or the Human Resources Manager could be the investigation manager in any case associated with alleged breach of behavioural Codes of Conduct.

Box 8: Addressing external queries

During an investigation, requests from external individuals (e.g. journalists, local authorities) or entities (e.g. another NGO) for information should be handled only by the investigation manager. Generally, the manager should not disclose any information about the investigation, including whether an investigation is underway. However, if the allegations and investigation become a matter of public record, then the senior management of World Renew should formulate a standard response to media and public enquires. That response should be adhered to strictly.⁶

⁵ HAP/BSO Investigation Guidelines

⁶ HAP/BSO Investigation Guidelines

5.4.4 Risk assessments and preliminary investigations

World Renew recognises that an investigation into a complaint can sometimes put the lives of the complainant, the Subject of the Complaint, the witnesses and even their families at risk.

An initial assessment of the level of risk involved for those concerned should be undertaken by the Safeguarding and Complaints Coordinator, in consultation with the Complaints Handling Committee, prior to launching a full investigation. A risk assessment requires an in-depth understanding of the local culture, beliefs, and attitudes to sexual abuse and exploitation and gender inequalities, among others.

If there is a high level of risk and there are concerns for the safety and security of the people involved, it is recommended to proceed first with a preliminary investigation which can be conducted remotely through a document review and remote interviewing with key witnesses.

The preliminary investigation gathers as much evidence as is possible using remote interviews and document reviews. Additionally, it can then make a more detailed risk analysis and recommend whether a full investigation needs to be undertaken or not, balancing the risks with the current availability of evidence and the likelihood of reaching a better outcome with a full investigation.

If a full investigation is launched, the investigation team should identify any immediate risks and put measures in place to minimise the risks. It may require referral of security concerns to a competent individual.

5.4.5 Legal considerations

When World Renew talks about an 'investigation' in the context of the Complaints Policy and Complaints Handling Guidelines, it is referring to an 'administrative', not criminal, workplace investigation. If, however, an administrative investigation is conducted effectively and professionally, it is legally enforceable. Therefore, it is imperative for the management and staff of World Renew, and its partners where relevant, to understand the significance, value and level of professionalism that is required in an investigation process for complaints.

If an allegation is substantiated, when considering disciplinary measures, World Renew senior management must follow national employment laws if the SoC is a local employee. If they are not followed and if the SoC was dismissed s/he could be reinstated or awarded damages. If the SoC is an expatriate and was hired in Canada or USA, it is important to check if the employment laws of that country apply.

In some countries there is a legal obligation to report allegations of child abuse or sexual assault to the national police. In other places, reporting will be

voluntary. Where reporting is voluntary and it appears that a crime may have been committed, management should consider whether, how and when to inform national authorities. The survivor's view should be sought, as people who report abuse may be at risk from the police in some places.⁷

As soon as investigators have evidence that any allegation is a crime, they must, through the investigation manager report it to the Co-Directors. If the Co-Directors decide to inform the national authorities, the administrative investigation must stop immediately so as not to hamper the criminal investigation and all relevant information collected during the investigation process should be handed over to the national authorities. The integrity of the police or judicial system and safety of the survivor, SoC and other witnesses are paramount considerations when making a decision.⁸

For humanitarian or development programmes, it is worth noting that if an international treaty in force in a country and the country's national law are incompatible then the law of a higher standard must be adhered to. Customary practice has no legal standing. If an individual is involved in a behaviour that is acceptable under customary practice but is a breach of national or international laws, the proper legal authorities can prosecute

her/him.⁹

5.4.6 Determining the allegations to be investigated

World Renew recognises that an allegation is an assertion of a breach of its policies or code of conducts. A complaint will usually allege that someone or some group has committed some offence. A central part of the investigative process will be to determine what allegations need to be investigated.

Initially, only one allegation may be evident. Sometimes, however, as an investigation progresses, other allegations may unfold. These may or may not be allegations against the SoC, but people who colluded with her/him (it may be that staff knew about the malpractice or misconduct but failed to report it). Such allegations can also be investigated in the context of the investigation process and disciplinary action taken.

As part of the planning process, consider what breach of World Renew policies and procedures the complaint refers to. Rewrite the allegation to reflect the breach in the language of the relevant policy or procedure that has been breached. The following is an example of an allegation: *"the SoC has exchanged food for sexual activity which contravenes World Renew's Code of Conduct"*.

List the World Renew rules and

⁷ Ibid

⁸ Ibid

⁹ HAP/BSO Investigation Guidelines

regulations that are violated by the alleged misconduct. It may be one rule or many. Identify specific elements of the rule(s) that must be shown to have occurred to state categorically that the rule has been violated. Determine what information will be needed to reach a conclusion and begin gathering appropriate data through witness interview and/or document review.

5.4.7 Whom to interview, where, and in what sequence?

Investigators must determine whom to interview based on the witnesses potential for information relevant to the complainant's or SoC's account. They could be anyone from drivers, house guards, house staff, to programme staff, local community members, among others. For the purpose of confidentiality, limit the number of witnesses to the most essential. Other potential witnesses may become evident during interviews.

As a general rule, witnesses are interviewed in the following sequence:

- 1. Complainant**
- 2. Survivor(s) of violation, if different from the complainant**
- 3. Other witnesses**
- 4. Subject of Complaint**

It is useful for investigators to do a profile of each witness in advance of interviews to identify their special needs and to ensure modification of interviewing techniques to suit the individual.

When choosing a location for interviewing, consider a place that can best ensure that the complaint remains confidential and is safe for the witnesses.

5.5. Conducting an Investigation¹⁰

5.5.1 Gathering evidence

Before interviewing witnesses, investigators will need to gather background information and evidence which are relevant to deciding if an allegation is true or not. This information comes in a number of

¹⁰ World Renew does not provide special procedures in this document for investigating SEA or for interviewing children or people with special needs as it recommends that only specially trained investigators undertake such investigations as it requires specialised skills and techniques

forms, the most common being:

- **Witness testimony** (e.g. a statement about what someone saw, heard, smelled, etc.);
- **Documentary evidence** (e.g. forms, photographs, videotapes, computer files);
- **Physical evidence** (e.g. examinations of the site of an alleged incident); and
- **Expert evidence** (authoritative opinions whether something is likely to have occurred, including medical expert – see special conditions that apply below).

Box 9: Investigator's key role

As an investigator, always remember when you are gathering information or evidence - you are gathering the facts - your aim is not to prove someone guilty. You are seeking and evaluating information and evidence which might support the complaint as well as information and evidence which might refute the complaint. Investigators should adopt a 'neutral' frame of mind, i.e. you should neither assume guilt nor innocence on the part of the subject.¹¹

Documents that may be relevant to an investigation related to a World Renew staff member may be:

- Employment contract and job description of the alleged SoC.
- Description of project if complaint linked to country programme.

- Staffing structure organisational chart.
- Any relevant correspondence related to the complaint.

Documents and items that might be used as evidence are:

- Work logs/staff rosters, leave requests (that may or may not place the SoC at the location at the time of the alleged event.
- Emails, photographs.
- Stores stockpiles of rations inventory, and ration books, etc.

If the SoC allegedly violated national laws, a copy of those laws should be reviewed by the investigators.

Box 10: Use of Medical Evidence

It is rare to use medical evidence in a workplace SEA investigation, given that in most cases it will not help establish whether exploitation or abuse has occurred. It is more common for the initial contact person to note any obvious physical signs of abuse when s/he first meets a witness and to record these details in a file. If they consider it to be absolutely necessary, the investigators may ask the witness whether they have seen doctor or other medical personnel and seek their permission to talk to that medical officer. Investigators should only speak to medical personnel about a witness if they have first sought the witness' permission.¹²

¹¹ BSO Training H025

¹² BSO guidelines, page. 12

5.5.2 Rights and obligations of witnesses

Prior to beginning any witness interviews, it is important to know the rights of witnesses. All witnesses (the Complainant, the Subject of Complaint and other witnesses) should be treated with courtesy and professionally at all times during an investigation. During interviews each witness should be allowed a short break, if requested.

Box 11: Presence of a 'third party'

No witness has an automatic 'right' to a third party accompanying them at the interview, lawyer or otherwise, to an interview in a workplace investigation. Having a third party is not advisable at an interview. They should only attend if World Renew consents. Consent should only be given if the third party is not themselves a witness, s/he agrees to remain silent during the interview and sign an Oath of Confidentiality (see Annex 8). The Oath is only enforceable if the third party is an employee or contractor of the organisation.¹³

The Complainant should...¹⁴

- Receive confirmation of receipt of complaint and information on how the organisation has responded to the complaint and what it plans to do next (for

example, the plan may be to investigate).

- Receive timely medical attention if s/he is the survivor of abuse and requires medical attention and associated information as noted earlier.
- Once the investigation begins, at no stage during the investigation should the complainant be informed about the status of the investigation.
- Be informed about the outcome of the investigation, although they have no automatic 'right' to know the outcome. It is generally sufficient to say that the complaint has been substantiated and referred to management for a decision on discipline, or that the complaint is not substantiated. The identities or the evidence of other witnesses should never be disclosed.

The Subject of Complaint should be...

- Treated the same as any other witness.
- Informed of the process and potential consequences of the investigation and any internal avenues of appeal.
- Have the allegation(s) explained to her/him during the interview, without divulging the identity of the complainant or witnesses.

¹³ BSO guidelines pg. 22

¹⁴ Or in the case of a child, her/his legal guardian if they are not implicated in the alleged offence

- Allowed, in her/his own words, to address every piece of evidence in support of the allegation(s) and to raise new evidence in support of her/his account.
- Given a clear breakdown of why the allegation equates to a breach of World Renew policies or principles.
- Advised that the investigation may lead to disciplinary and/or law enforcement action, if relevant.
- Advised that it is best for her/him to cooperate as it is her/his opportunity to present all evidence in her/his favour.
- Allowed to withhold documents from the investigators if they were created in their private capacity using their own equipment.
- Be informed by the Investigations Manager, in writing (where possible), of the outcome of the investigation. Again, the names of witnesses, or the complainant should not be disclosed no matter what the outcome of the investigation.

...and should NOT be

- Told the name of the complainant even if s/he asks. If s/he persists, reiterate the importance of confidentiality for the interview process.
- Told the sources of evidence during the interview.
- Informed if the allegation has been referred to the national

authorities for criminal prosecution as further action will be taken by the national prosecuting authority.

If it is quickly determined during an investigation process that there is no basis for proceeding, the investigation manager is only required to notify the SoC that s/he has been investigated and that the investigation has been discontinued if the SoC is already aware of the investigation.

Other witnesses

Witnesses who are employed by World Renew have a duty to cooperate and an obligation to tell the truth. If they choose not to cooperate, they can have disciplinary action taken against them;

Witnesses who are not employed by World Renew do not have a duty to answer questions, but are encouraged to do so in support of a 'fair' investigation;

World Renew staff aware of the investigation should be generally informed of the outcome.

Other non-World Renew employee witnesses do not need to be notified;

If the SoC's supervisor is aware of the investigation, s/he must be advised of the outcome in general terms.

5.5.3 Preparing for interviews

In an investigation, it is recommended that investigators only call a witness once (including the SoC) during the

course of any one investigation. Therefore, thorough preparation is necessary for all witness interviews to ensure that gaps in information or inconsistencies are addressed. See attached, **Annex 10: The four stages of interviewing**, which provides guidance for the interviewing process.

As a team of two investigators, devise an interview plan for each witness. And chart all the information available about each witness. Then determine what information you are missing. Do this before every interview as the questions (or emphasis of particular questions) may change depending on information supplied by previous witnesses. See **Box 12 for Interviewing Ground Rules**.

Box 12: Interviewing Ground Rules

- **Introductions**
- **Honesty and accuracy**
- **Confidentiality**
- **Explain purpose of note-taking**
- **Acceptable to state when answer is not known**
- **Right to ask for a short break**

Interviewing Ground Rules (elaborated)

When a witness arrives (the complainant, SoC, or other witnesses), thank them for attending the interview, be courteous and provide the following opening information.

Introductions: Introduce investigators,

experts and interpreters (make sure that the witness has been introduced to everyone in the room and their roles, as the witness may feel nervous or vulnerable);

Honesty and Accuracy: Inform World Renew staff that they have a *duty to respond* and an *obligation to tell the truth*. For witnesses who are non-World Renew staff, simply thank them for their time and explain it is important for them to be accurate.

Confidentiality: Inform World Renew staff that for the purpose of confidentiality, they must refrain from communicating with other persons interviewed in this investigation process; Explain that as a staff witness, breaching confidentiality can result in disciplinary measures. Non-staff witnesses should also be aware of the need for confidentiality (of course, compliance cannot be enforced, instead, emphasis should be made on ensuring a *fair* investigation);

Purpose of note-taking: Explain who will be taking notes (if there are two investigators, it is best if one leads on questioning and one focuses on taking detailed notes – verbatim if possible) and that the purpose of taking notes is for accuracy. Explain that at the end of the interview, the witness will be provided with a verbal summary of the interview and s/he will be given the opportunity to read the content of the notes and to sign that they agree with the record. Note the date, start and end time of the interview on the statement. Also note if the interview is

face-to-face or by other means.

Acceptable to state when answer is not known: Clarify to the witness that it is ok when they genuinely cannot remember or do not know a particular piece of information.

Right to ask for a short break: Tell the witness where the bathroom facilities are. Offer them water and explain they can ask for a short break if they need it.¹⁵



When recording a witness statement/testimony, do not write the name of the witness on the statement to ensure confidentiality of the statement should it get into the wrong hands. Instead have a pre-established coding system as outlined in Section 5.4.1.

It is good practice for both investigators to sign and date the witness's statement after the witness has signed. Any amendments by the witness should be signed by the witness and countersigned by the investigators. If a witness refuses to sign, do not force her/him. However,

remind Word Renew staff that they have an obligation to cooperate with the investigation and lack of cooperation is grounds for discipline.

Always end the interview by asking the witness if they have anything to add and if they have any questions. End by thanking the witness for her/his time.

The investigators should then summarize the information obtained during the interview and evaluate it for consistency and reliability with other evidence.

Box 13: Tips for investigators

During interviews, “avoid interrupting or clarifying ambiguities. Have an ‘active listener’ posture. Elicit more information by repeating key phrases used by the witness. Offer prompts that relate to the witness’s account only – not to other witnesses’ evidence. Work at the pace of the interviewee. Do not give positive or negative feedback during interviews. Investigators should beware of unintentionally communicating approval or disapproval through facial expressions and voice inflexions”.¹⁶ Avoid judgmental words or approaches especially when interviewing the SoC. No copies of the testimony are given to the witnesses.

5.6 Reporting Findings and Follow-up

The investigation manager is

¹⁵ HAP/BSO Investigation Guidelines

¹⁶ HAP/BSO Investigation Guidelines

responsible for presenting the investigation findings and the report 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.

The investigation will result in one of the following three outcomes:

1. “established by reasonable inference” (there is clear and convincing evidence)
2. “not established due to insufficient or unclear evidence”
3. “not established based on evidence to clear the SoC or

evidence to establish a malicious complaint”

5.6.1 Investigation report

When the evidence has been reviewed and validated, the investigators must write an ‘investigation report’ (See **Annex 11: How to write an investigation report**). This should ideally be submitted to the World Renew Hearing Committee (the Complaints Handling Committee plus one person from a third party) within two weeks after the completion of the fact-finding phase of the investigation. If this is not possible, write a note to the file outlining the reasons.

The report contains the investigators’ conclusions on whether, on the available evidence, there has been a breach of the relevant standards of conduct. Recommendations to management regarding training, supervision or organisational policies should not be included in the investigation, but instead documented in a separate ‘Management Implication Report’. This is to ensure confidentiality and to separate the allegations from what the investigators discovered with regards to poor management practices.

If there is more than one SoC, a separate report should be written for each one to facilitate the initiation of disciplinary proceedings if misconduct is established.

Investigators should avoid speculation and conjecture when drawing a conclusion. The conclusions should be

supported by written documentation and provide factual information.

The investigators must share a copy of the report with the investigation manager. The manager checks the report to ensure that conclusions are rational, appropriate and supported by reliable, consistent and relevant evidence.

The investigation will result in one of the following three outcomes as outlined above¹⁷.

Box 14: Deciding on disciplinary measures

Note: The investigators, the investigation manager or anyone on the investigation team should never take a decision on disciplinary measures in formal investigations. Senior management (often one of the Co-Directors together with Human Resource Manager) must take disciplinary decisions based on defined organisational policies.

5.6.2 Appeal process

The Complainant or Subject of Complaint may lodge an appeal (in writing, where possible) within 30 days of receipt of outcome of the investigation. The circumstances may relate to the following issues (this list is not exhaustive):

The Complainant...

Disagrees with the findings of the investigation. Their reasons may include:

- witnesses that s/he thinks could have supported the allegations were not interviewed by the investigators.
- some important parts of the complaint were not investigated.
- more evidence was available but not gathered.
- the organisation has not done enough to prevent the same thing happening again.

The Subject of Complaint...

Disagrees with the findings of the investigation. Their reasons may include:

- witnesses that s/he thinks could have refuted the allegations were not interviewed by the investigators.
- some important parts of the complaint were not investigated.
- the evidence gathered does not support the investigation's conclusions.

5.6.3 Taking action and follow-up

World Renew's senior management (CPAC) must share the results of the investigation on a 'need to know' only basis, as outlined earlier. Senior management, in cooperation with the Complaints Handling Committee if appropriate, should immediately make

¹⁷ i) "established by reasonable inference" (there is clear and convincing evidence) ii) "not established due to insufficient or unclear evidence" or iii) "not established based on evidence to clear the SOC or evidence to establish a malicious complaint"

a decision on disciplinary action if the complaint was substantiated. Such action can range from verbal and written warnings to dismissal and referral to national authorities for prosecution. Serious disciplinary measures must be enforced if an allegation of Sexual Exploitation and Abuse has been substantiated.

If investigators provide recommendations to management for follow-up, especially if they found World Renew's practices to be sub-standard, senior management should develop and implement an action plan to address the issues as a matter of urgency and especially in respect to protecting people from SEA. A copy of the action plan should be maintained in the investigation file.

World Renew management should monitor regularly to ensure that all possible measures have been put in place to make sure that a similar offence does not recur.

World Renew should retain key personnel records, including complaints, for the duration of an employee's employment plus 5 years.

The team involved in any formal investigation process, should, after each investigation, sit and discuss what it did well, and what it could do better next time. Such investigations, especially involving staff members, can be traumatic for a team, perhaps leaving some members requiring some external support or group counselling.

6. Reporting on Complaints and Learning for Improvement

Partners should report, on a quarterly basis, to their designated World Renew Safeguarding and Complaints Focal Point any complaints related to World Renew funded work.

Complaints reports are then compiled on a quarterly basis by each Safeguarding and Complaints Focal Point and submitted to the Safeguarding and Complaints Coordinator as well as to their relevant country or regional leadership. These reports should include a 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. A sample format for these quarterly reports is included in **Annex 12**.

The Safeguarding and Complaints Coordinator is then responsible for compiling a global complaints report on a quarterly basis, aggregating the information from the quarterly reports submitted by the Safeguarding and Complaints Focal Points and combining it with the complaints handling data and information received directly at the Home Office. This is submitted on a quarterly basis to the Senior Management Team (CPAC).

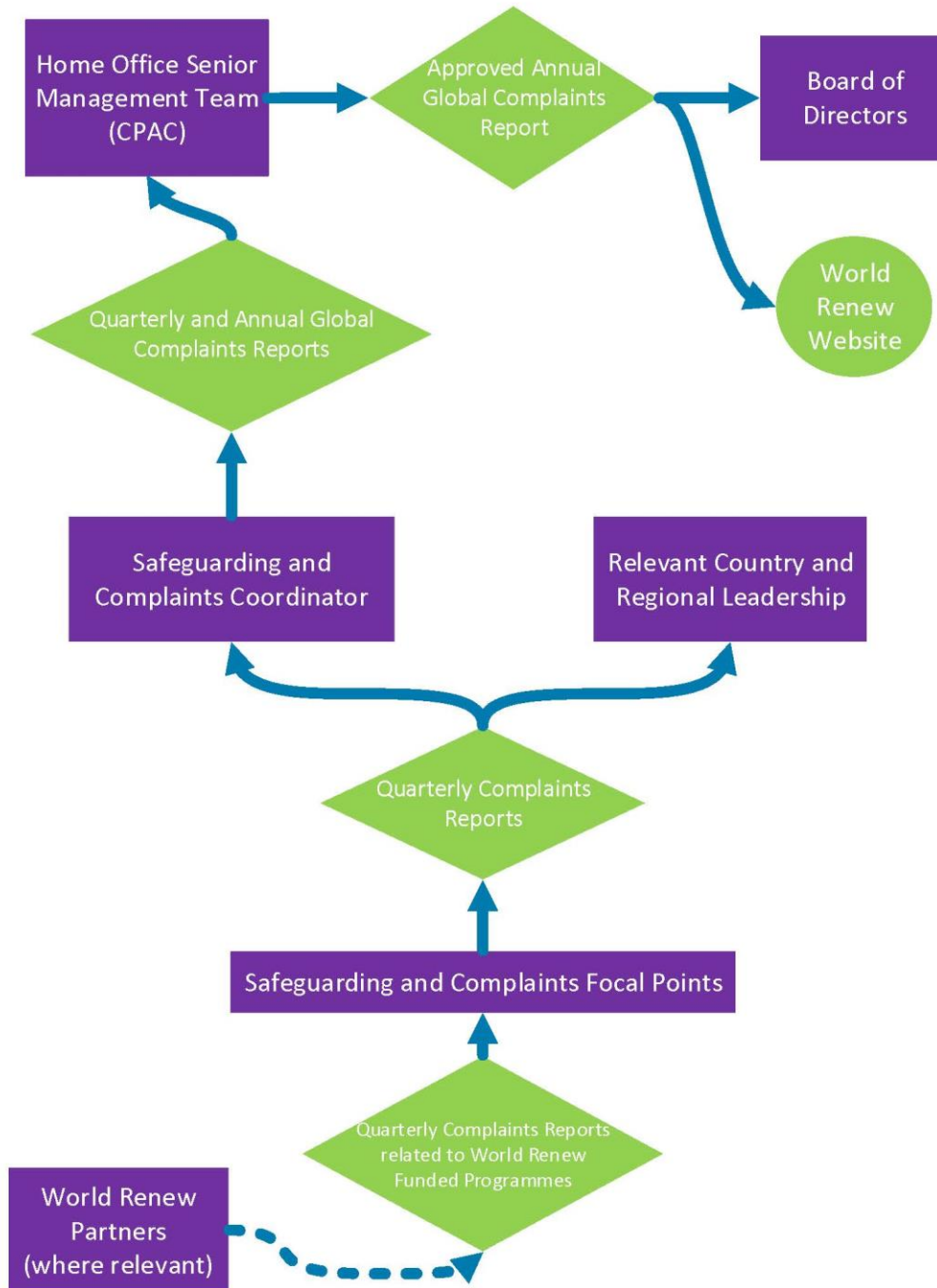
Additionally, an annual global complaints report is compiled by the Safeguarding and Complaints Coordinator which contains a global summary of the number and type of complaints received, along with information, where relevant, about how the complaint was handled and what lessons have been learned. A sample format for the annual complaints report is included in **Annex 12**. Any confidential information, including personal data, will be excluded from all complaints reports.

After approval from the senior management team, the annual global complaints report is presented to the Board of Directors, as well as being made publicly available, for example by posting it on the World Renew website.

The act of publicly reporting on the complaints mechanism serves to demonstrate accountability and also encourages those who may wish to make a complaint that the mechanism is functioning effectively. It also demonstrates that there is an organizational culture at World Renew in which complaints are taken seriously and that there are established policies and processes in place to support the complaints mechanism and, that learning is captured to continually improve the mechanism.



Figure 5: Flow of Reporting on Complaints (refer to Chapter 6 for more details)



Annex 1: ToR for Safeguarding and Complaints Coordinator

World Renew Safeguarding and Complaints Coordinator

Terms of Reference

The role of the Safeguarding and Complaints Coordinator is established at the Home Office of World Renew at a minimum grade level of 12. It is anticipated to be a full-time role (1FTE).

The overall responsibility of the Safeguarding and Complaints Coordinator is to support the organisation to comply with the World Renew Complaints Policy, with a focus on handling complaints at the home office level, building and strengthening capacity on complaints handling throughout the organisation, supporting safeguarding and complaints focal points in their role, handling investigations and reporting on complaints.

Specifically, the Safeguarding and Complaints Coordinator is responsible for:

Policy Compliance:

- Overseeing the implementation of the Complaints Policy, together with related policies and guidelines, throughout the organisation;
- Ensuring the communication of the key contents of the Complaints Policy, and other related policies, to all staff;
- Supporting and advising the Ministry Team Leaders on the establishment of relevant and contextualized complaints mechanisms in their regions.

Capacity Building:

- Supporting the provision of annual refresher trainings on the contents of the Complaints Policy for all staff;
- Building and strengthening capacity of key staff on complaints handling to enable effective response to complaints, with a focus on building the capacity of all Safeguarding and Complaints Focal Points;
- Providing ongoing support and advice to Safeguarding and Complaints Focal Points on handling complaints, in general and in specific cases as requested.

Handling Complaints:

- Handling complaints received at the Home Office by post or through the complaints@worldrenew.net email inbox in coordination with the Complaints Handling Committee;
- Coordinating the functions of the Complaints Handling Committee, including calling meetings when needed; preparing relevant documentation and recommendations for discussion on specific complaints cases and handling investigations;

- Ensuring all information related to complaints is well documented, including a log of complaints, and that all information is kept secure with access restricted to authorized personnel only;
- Referring reports related to safeguarding issues (eg related to children or vulnerable adults) that do not constitute a complaint against World Renew, its staff or partners, to the relevant authorities or to organisations with the relevant expertise as necessary.
- Ensure appropriate cover is in place for handling complaints when on leave or unavailable for more than 2 days.

Handling investigations:

- Coordinating all investigations processes, in coordination with the Complaints Handling Committee, including the timely appointment of investigation teams, support to the investigators where needed and enabling the presentation of the investigation team's findings to the Hearing Committee.

Reporting and Learning:

- Compiling an annual complaints report for the Senior Management Team (CPAC), including 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;
- Ensuring that the annual complaints report is submitted to the Board of Directors and made publicly available on the World Renew website;
- Document feedback and learning on the Complaints Policy during implementation to inform future revisions to the policy and guidelines.

Support and Training:

- Committing to ensure own capacity is developed and strengthened in the area of complaints handling by attending relevant training sessions on a regular basis and keeping abreast of latest developments in the sector in relation to complaints handling.

Conflict of Interest:

- In the event that there is a conflict of interest between the Safeguarding and Complaints Coordinator and the content of the complaint, it should immediately be referred to the Complaints Handling Committee and the Safeguarding and Complaints Coordinator should play no further role in the handling of that case.

Annex 2: ToR for Complaints Handling Committee (CHC)

Overall Responsibility:

The Complaints Handling Committee (CHC) 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, 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.

Specific Responsibilities:

- Assess the nature of each complaint presented by the Safeguarding & Complaints Coordinator and provide advice on how to proceed.
- Advise Safeguarding and Complaints Coordinator when to delegate feedback or complaints to relevant staff members to follow up, depending on the project, partner or issue in question.
- Always be informed of complaints related to a breach of the World Renew Codes of Conduct.
- Always be informed of any request for an investigation as a result of a complaint.
- Support the handling of all investigations in coordination with the Safeguarding and Complaints Focal Point and in line with the Complaints Handling Guidelines.
- Form the core component of the Hearing Committee, together with one person from a third party, to hear the investigation findings from the investigation manager.
- Support the communication of the outcome of any investigation to the subject of the complaint, together with one other representative of World Renew management/leadership.

Composition:

The Complaints Handling Committee is composed of:

- at least one of the Co-Directors.
- the Safeguarding and Complaints Coordinator.
- Person(s) from World Renew leadership (Ministry Team Leader or CPAC) who have technical expertise in complaints handling, including expertise in Human Resources.
- Other senior staff with specific and relevant expertise depending on the type of complaint being handled.

The quorum for the Complaints Handling Committee is three persons, of whom the Co-Director must always be present when dealing with complaints related to a breach of the World Renew Codes of Conduct. The Complaints Handling Committee can, when deemed necessary, co-opt a temporary committee member with the relevant expertise to manage a specific complaint and/or investigation. In addition, the Committee may co-opt an individual(s) to join the Committee when managing a complaint(s) that requires specific expertise.

Complaints Handling Committee members are endorsed by CPAC.

Coordination:

Coordination of the Complaints Handling Committee is provided by the Safeguarding and Complaints Coordinator.

Conflict of Interest:

If there is a conflict of interest that makes it inappropriate for a Complaints Handling Committee member to participate in the review of a particular complaint, an alternative committee member can be sought.

Annex 3: ToR for Safeguarding and Complaints Focal Points

World Renew Safeguarding and Complaints Focal Points

Terms of Reference

The role of a Safeguarding and Complaints Focal Point is established in all regions, at either a programme, country or regional level, depending on the context (number of programmes, number of offices, number of World Renew Staff etc.) in each World Renew programming location. It is a part time role that on average can be expected to take half a day per week (i.e. 0.1 FTE) with certain periods being busier than others throughout the year, depending on the types of complaints that are received. It is advised to combine this with another role that enables flexibility throughout the year to handle peaks and troughs of workload related to complaints handling.

The overall responsibility of a Safeguarding and Complaints Focal Point is to support the administrative function of the established complaints mechanisms in their designated area, with a focus on handling incoming complaints in coordination with their Complaints Advisory Group, and immediately escalating complaints that require investigations to the Safeguarding and Complaints Coordinator. In this work, the Focal Point is assured of the full confidence and support of the organisation and the Co-Directors. Regular reporting on number and types of complaints received is also a key responsibility.

Specifically, a Safeguarding and Complaints Focal Point is responsible for:

Handling Complaints:

- Receiving and handling complaints received in coordination with the Complaints Advisory Group;
- Calling meetings of the Complaints Advisory Group when needed, including preparing relevant documentation and presenting specific complaints for discussion;
- Ensuring all information related to complaints received is well documented, including a log of complaints received, and that all information is kept secure with access restricted to authorized personnel only;
- Ensure appropriate cover is in place for handling complaints when on leave or unavailable for more than 2 days.

Referring Cases:

- Referring reports related to safeguarding issues (e.g. related to children or vulnerable adults) that do not constitute a complaint against World Renew, its staff or partners, to the relevant authorities or to organisations with the relevant expertise as necessary.

- Immediately escalating any complaint requiring an investigation to the Safeguarding and Complaints Focal Point and Complaints Handling Committee at the Home Office.

Reporting and Learning:

- Compiling quarterly complaints reports for the Safeguarding and Complaints Coordinator, including a 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;
- Document feedback and learning on handling complaints during implementation to inform future policy and guidelines revisions.

Support and Training:

- Committing to ensure own capacity is developed and strengthened in the area of complaints handling by attending relevant training sessions as required.
- Seeking support and advice from the Safeguarding and Complaints Coordinator, on a case by case basis, as needed.

Conflict of Interest:

- In the event that there is a conflict of interest between the Safeguarding and Complaints Focal Point and the content of the complaint, it should immediately be referred to the Safeguarding and Complaints Coordinator to handle and the Safeguarding and Complaints Focal Point should play no further role in the handling of that case.

Annex 4: ToR for Complaints Advisory Groups (CAG)

Overall Responsibility:

The Complaints Advisory Groups (CAGs) are established minimally at a regional level and additionally at a country or even programme level, if appropriate. Each Safeguarding and Complaints Focal Point is linked with a specific Complaints Advisory Group. Some Complaints Advisory Groups may have more than one Safeguarding and Complaints Focal Point linked to them. 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 Guidelines.

Specific Responsibilities:

- Assess the nature of each complaint presented by the Safeguarding & Complaints Focal Point and provide advice on how to proceed;
- Advise Safeguarding and Complaints Focal Point when to delegate feedback or complaints to relevant staff members to follow up, depending on the project, partner or issue in question.
- Ensure the Safeguarding and Complaints Coordinator and the Complaints Handling Committee are always informed of any complaints related to a breach of the World Renew Codes of Conduct.
- Ensure any case requiring an investigation is immediately referred by the Safeguarding and Complaints Focal Point to the Safeguarding and Complaints Coordinator and the Complaints Handling Committee.
- Ensure, in the planned or unplanned absence of the Safeguarding and Complaints Focal Point, that systems are in place to continue to handle complaints in a timely manner.

Composition:

Complaints Advisory Groups should be composed of a minimum of 3 people, including:

- Safeguarding and complaints focal point
- A senior member of staff (this could be the Ministry Team Leader at the regional level, or the Country Consultant/Director at a country level or the Programme Manager at a Programme level).
- Other staff with relevant technical expertise or experience/trained in handling complaints

The Complaints Advisory Groups can, when deemed necessary, co-opt a temporary member with the relevant expertise to advise on specific complaint(s) that requires specific expertise (e.g. finance, HR, etc.).

Working methods:

The Complaints Advisory Groups do not need to meet face to face. The complaints mechanism needs to be timely and responsive to complaints received, and often using methodologies such as group email discussions or conference calls, as needed, will work better than attempting to schedule face to face meetings.

Where appropriate face to face meetings can also be utilised.

Meetings do not need to be scheduled regularly, but rather the Complaints Advisory Groups should be responsive to the requests for advice or guidance coming from the Safeguarding and Complaints Focal Point.

Conflict of Interest:

If there is a conflict of interest that makes it inappropriate for a Complaints Advisory Group member to participate in the review of a particular complaint, an alternative committee member can be sought.

Annex 5: Sample template of Complaints Log

#	Date Received at World Renew (complaint)	Date taken to investigate (complaint)	Number of days taken to investigate (complaint) (less than 7 days)	Classification: Complaint/Concern / Out of scope / Negative feedback	If applicable, is it an allegation of sexual exploitation or abuse (SEA)? (Y/N)	Summary of issue (keep anonymous)	Formal Report? (Y/N)	Was the Outcome Appealed? (Y/N)	Complaint terminated? (Y/N)	Action Taken (e.g. initiate of XXX investigation etc)	Current Status (e.g. Open / Case Closed)	Date Case Closed	If the case was a complaint, was it resolved as follows: (Y/N) (Not Applicable)	If the complaint required an investigation, was it done within 30 days (if not applicable, wait 30 days plus 30 days to complete the investigation) (Y/N) (Not Applicable)	If the complaint was reported as an investigation and it was completed within 30 days plus 30 days to complete the investigation (Y/N) (Not Applicable)	Key findings from case	Other comments
000001	15/01/2018	15/01/2018	2	Complaint	No	Complainant (Y/N) contacted staff via email to have a conversation with a supervisor.	Yes	No	Yes	Complainant referred to SOC and OIC. They initiated an investigation into the alleged sexual exploitation. Discontinue action taken.	Case Closed	10/07/2018	Y/N (Not Applicable)	Y/N (Not Applicable)	Staff in question had not been investigated and it was not possible to determine if the complainant was correct. New security measures in place at the time of the incident. All access staff now required to sign SOC when they are in the building.		

Annex 6: Good practice when handling complaints from vulnerable people

It is important to handle complaints, including providing feedback on the outcome of a complaint, in a manner that increases confidence in the investigatory process and acceptance of the outcome of an investigation, even in cases where the outcome is not what the complainant would have wished. When the complainant is known, or believed to be vulnerable, the following good practices can particularly help to achieve this:

1. Plain Language Communication

Plain language should be used when communicating about complaints. Plain language refers to using words, sentence structure and design that makes the message clear and easy for the intended audience to find, understand, and use. Plain language communication is characterised by a formal yet conversational style that includes short sentences, active voice, first or second person pronouns, and common, everyday words.

Using Plain Language is of particular benefit when communicating with vulnerable people. Using the most accessible and easily understood language will make it easier to comprehend and retain the information that is being shared. Using plain language may also help decrease the sense of powerlessness that more vulnerable complainants may be feeling.

2. Written Explanation of the Principles and Process of Investigations

Vulnerable complainants should be provided with a written explanation of the process of investigations that outlines the principles involved in investigation and describes the process in brief. This explanation should include how World Renew approaches investigations in which the alleged survivor does not wish to participate in the investigation, why they proceed with investigations nonetheless, and the right of and respect for alleged survivors to not participate in the process.

3. Validating Complainant's Reactions to Investigation Outcomes

Another helpful strategy in supporting vulnerable complainants is to validate their reactions to negative decisions as normal. Decision-makers, in their desire to avoid causing pain or harm to vulnerable complainants, may sometimes invalidate the anger, disappointment, sadness, or other emotions that complainants feel when investigations do not go the way they want. This tendency may come from trying to convince the person not to feel what they feel, trying to convince the person that the news is not bad news after all, or in more extreme cases, blaming the complainant either implicitly or explicitly for their own suffering. Most typically, these types of

responses to complainants stem from the decision-maker's own discomfort with negative emotions, feelings of responsibility, and distress at having to deliver bad news. Paradoxically, validating the complainant's emotional response and allowing time to process those emotions makes it more likely that the complainant will accept, if not agree with, the decision.

4. Giving feedback on the outcome of the investigation in person

In situations in which the complainant is known, or believed to be vulnerable, it would be helpful to give feedback regarding the outcome of the investigation in person or by telephone to allow for the complainant to have time to respond, ask questions, and to process their reaction with another person.

Annex 7: Key components of Investigation Team TOR

A ToR should include the following elements:

- Purpose of the investigation: (for example, To gather information that proves or disproves the allegation—noting the specific complaint)
- Background and description of the complaint, without giving names of complainant, Subject of Complaint, or witnesses
- Special considerations
- Suggested Timeframe for milestones (as outlined in Complaints Policy and these guidelines)
- Roles and responsibilities of each member of investigation team (see Annex 10)
- Permission to access staff promptly and to require the full cooperation of anyone working in the organisation (BSO Guidelines).
- Suggested reporting Format (for Investigation Report and Management Implication Report see Annex 12)
- Suggested travel plan (if necessary)

Annex to the ToR:

Authorisation to investigators to collect evidence without hindrance or prior clearance by World Renew management. This should be an annex so that the Investigation team can use it when necessary.

Annex 8: Sample Oath of Confidentiality

I, the undersigned, shall exercise the utmost discretion with regard to my involvement in the investigation being conducted by World Renew.

I shall hold secret all information known to me by reason of my participation in the investigation procedures. I shall not use such information for private gain, or to favour or prejudice any third party.

I understand that this declaration will remain in force after the completion of the investigation. I also understand that divulging confidential information to persons who are not authorized to receive it may amount to misconduct, and that the signed original of this declaration will be held in the relevant investigation file.

Name: _____

Title: _____

Role: _____

Signature: _____

Date and Place: _____

To be filled out by an Investigator or by a World Renew Staff member before whom the above Oath is taken:

Title: _____

Name: _____

Signature: _____

Date and Place: _____

Annex 9: Sample roles and responsibilities of investigation team

a) Responsibilities of Investigation Manager

The investigation manager's responsibilities are to oversee the investigation, take strategic decisions and create the conditions for investigators to do their work. This includes:

- making the key decisions about the direction of the investigation, such as whether to investigate or whether to suspend or redeploy the SOC during the investigation.
- ensuring that safety and confidentiality plans are implemented, and that the investigation is conducted according to key principles and procedures.
- liaising with external institutional stakeholders, such as national authorities and other agencies.
- appointing personnel to the investigation team and managing the relationship between the investigation team and the rest of the organization.
- presenting the findings and investigation report to the Hearing Committee so that the Hearing Committee can determine the outcome.
- ensuring that investigators are trained, supervised and referred for emotional and psychological support when necessary.
- ensuring the investigators follow the principles of an investigation and that the investigation report is logical and conclusions are fair and based on evidence gathered.

b) Responsibilities of Investigators

Investigators are responsible for the day-to-day conduct of the investigation, as defined by TORs. Normally, their responsibilities include:

- developing the investigation plan.
- assessing and making recommendations on safety, confidentiality.
- securing evidence.
- making recommendations on the work status of the SOC for the duration of the investigation.
- gathering evidence.
- preparing and submitting the report.
- making a finding on the evidence.
- making recommendations on the policies and practices that may have enabled the exploitation/abuse to occur.

Annex 10: The four stages of interviewing¹⁸

1. Establishing rapport

The purpose of the ‘rapport’ stage is for the interviewer to introduce him/herself and to tell the witness why s/he is being interviewed. The rapport stage is also important for gaining the witness’ trust and enabling the witness to feel like they can give a full and frank account.

To establish rapport, the interviewer should:

- introduce him/herself, the co-investigator and anyone else present at the interview
- provide the witness with their contact details
- explain the roles of everyone at the interview
- clarify the purpose of the interview, without giving details of the allegations
- clarify the ground rules
- ensure the witness knows her/his rights and obligations
- offer the witness refreshments and inform her/him that s/he is entitled to reasonable breaks and refreshments during the interview
- make small talk on neutral subjects such as the witness’ work, hobbies, etc. to put him/her at ease.

2. Free narrative

The purpose of the ‘free narrative’ stage is to get a witness’s uninterrupted account of events.

To stimulate free narrative, the interviewer should:

- ask very open questions e.g. “Can you tell me about your duties?”
- use neutral prompts that relate to the witness’ account (without referring to other witness’ testimony) e.g. “And then what happened?”
- repeat key phrases
- ask for further clarification
- adopt an “active listener” posture

The interviewer should not interrupt or clarify ambiguities at this stage. If unsure of something, the interviewer should make a note to return to it in the ‘specific questions’ phase.

3. Specific questions

In the ‘specific questions’ phase, the interviewer clarifies the information the witness

¹⁸ Extract from HAP/BSO Investigation Guidelines

has already given and to help the witness give relevant information s/he was unable or unwilling to give during the free narrative.

Types of specific questions are:

- open ended questions (e.g. “Tell me more about your teachers”)
- specific questions (e.g. “What happened after you went back to the school?”)
- closed questions (e.g. “What was he wearing when you went back to school?”)

Interviewers should avoid asking leading questions (e.g. “Was he wearing a red shirt?”) as these may distort the witness’ testimony.

Dealing with intentionally obstructive witnesses

Sometimes witnesses will resist or refuse to co-operate. The interviewer’s response will depend on how and why the witness is resisting and whether they are staff members of the organisation.

Staff witnesses (including staff of organisations contracted to the investigating NGO) who are being intentionally and overtly obstructive, can be ‘reminded’ that they are contractually obliged to cooperate with the investigation, to tell the truth and to maintain confidentiality and that they may be disciplined for failing to do so (this is a matter for managers). Otherwise, any hostile behaviour should be recorded in the Record of Interview.

Non-staff witnesses are not legally obliged to answer questions or even attend the interview. That said, the interviewer can still stress the importance assisting the investigation, and of being truthful, accurate and discreet.

4. Closure

To end, the interviewer should:

- check with the co-investigator if there are outstanding matters
- summarise what the witness has said
- ask if the witness has anything to add
- answer any questions s/he has
- remind the witness how to make contact with the interviewer
- note the time on the Record of Interview
- thank the witness for her/his time.

If the witness provides more relevant information after the summary, the investigator should clarify and confirm the new information and then summarise it to the witness.

Annex 11: How to write an investigation report

Report Structure:

Report pages should be numbered consecutively, beginning with the title page. The Report should be structured in the following way:

- Title page
- Table of contents
- Executive summary
- Introduction and preliminary remarks
- Methodology
- Investigative findings
- Conclusions and recommendations
- Annexes

Executive summary

The Executive summary provides the reader with a concise overview of the investigation from the time the organisation received the allegation, through to the writing of the report. It should not contain any information, which is not in the main body of the report.

Introduction

The Introduction contains:

- the name/s or case reference number of SOC/s
- date of the report
- a confidentiality statement
- information about the nature of the complaint and references to the standards allegedly breached
- information about the scope of the investigation (number of complainants, witnesses, SOCs, etc.)
- brief contextual information (e.g. country, refugee camp etc.)

Methodology

The Methodology sets out:

- the process used during the investigation
- the evidence required
- the interviews conducted
- any impediments to the investigation (i.e. lack of co-operation or unwillingness by any witness to be interviewed)

Investigative findings

The Investigative findings summarise the evidence relevant to each alleged complaint; they will be used to draw conclusions.

Conclusions and recommendations

The Conclusions and recommendations tell the reader whether or not the evidence supports each complaint as alleged. It is important that the Conclusions are clearly stated for each alleged complaint.

The investigation will result in one of the following three Conclusions:

- “found by reasonable inference”
- “not found due to insufficient or unclear evidence”
- “not found based on evidence to clear the SOC or to establish a malicious complaint”

Management implication report (MIR)

Finally, investigators may decide to make other recommendations regarding training, supervision, or organizational policies. The MIR will be especially relevant if the investigation findings are that the organisation’s practices are sub-standard with respect to protecting people of concern from SEA. The MIR should also record any concerns about possible reprisals against witnesses or other participants.

The Report should attach documents that support the investigation’s conclusions and which are in the investigation.

Annex 12: Sample Reporting Format for Quarterly and Annual Complaints Reports

Complaints Report

This report should be adapted as necessary for either the quarterly reports or annual reports. Any confidential information related to the complaints, including personal data, must be excluded.

1. Report Submission Information

Operational Area covered by this report (e.g. name of programme/country/region/global)	
Name of person completing this report	
Role of person completing this report	
Period the report covers	
Date of submission of report	

2. Complaints Data

Please complete this table with total numbers for the period of this report:

Number of pieces of positive feedback received:	
Number of pieces of negative feedback received:	
Number of concerns received:	
Number of complaints received:	
Number of SEA-related complaints received	
Number of investigations initiated:	
Number of complaints cases currently open:	
Number of complaints cases closed:	
% of complaints acknowledged within 7 days	
% of complaints not requiring an	

investigation resolved within 21 days	
% of complaints requiring an investigation and not appealed resolved within 90 days	
% of complaints received that were appealed resolved within 120 days	

3. Lessons Learned

Please describe here any lessons learned from the process of handling complaints during this period. (Please consider the following guiding questions in your response: What worked particularly well with the process of handling complaints during this period that you want to highlight? What challenges did you encounter in handling complaints that would require doing something differently next time? What changes have been made to processes or procedures as a result of the complaints handled during this period?)

Annex 13: Key Terms and Definitions

A number of key terms are used throughout this document; they are defined as follows.

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 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 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 vulnerable adult.

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.

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.

SEA: Sexual Exploitation and Abuse

Sexual abuse: is actual or threatened physical intrusion of a sexual nature, including inappropriate touching, by force or under unequal or coercive conditions. (United Nations Secretary General's Bulletin 2003/13, 9 October 2003; Special Measures for Protection from Sexual Exploitation and Abuse).

Sexual exploitation: is defined as any actual or attempted abuse of a position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another (United Nations Secretary General Bulletin, 9 October 2003). In these situations, the potential victim believes she/he has no other choice than to comply; this is not consent and it is exploitation. Some examples include, but are not limited to:

- *Humanitarian/development worker demanding (or accepting) sex in exchange for material assistance, favors, or privileges.*
- *Teacher insisting on (or accepting) sex in exchange for passing grade or admission to class.*
- *Refugee leader demanding (or accepting) sex in exchange for favors or privileges.*
- *Security worker insisting on (or accepting) sex in exchange for safe passage.*
- *Driver demanding (or accepting) sex to give a female person a seat in the vehicle.*

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.