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Annual report 2023

Act Church of Sweden, Complaints and Response Mechanism (CRM)

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Annual Report 2023 Act Church of Sweden Complaints Mechanism

Introduction

The Complaints and Response Mechanism (CRM) is an essential part of the Act Church of Sweden's work on quality assurance. Since March 2016, Act Swedish Church is certified according to The Core Humanitarian Standard on Quality and Accountability (CHS), where a complaints function is one of the basic requirements. In 2012, Act Church of Sweden chose to implement the work with CRM in its operations.

The CRM Focal Point receives and ensures that cases are followed up in accordance with Act Church of Sweden CRM Handbook. The CRM Focal Point prepares and presents cases in the CRM committee and is responsible for documentation. The committee consists of:

The International Director Act Church of Sweden or his/her designee.

Head of Section for Finance, Management and Operational Support Act Church of Sweden

Head of Section for Partnerships Act Church of Sweden

Senior representative from the HR department

Representative from SARG (Strategic deviation Reporting Group) who is also one of the two CRM focal points.

CRM Focal Point Act Church of Sweden.

This report presents the financial year of 2023 regarding Act Church of Sweden complaint management. After a brief presentation of the Act Church of Sweden's CRM, the complaints received during the year and the type of problems that have arisen are presented. A comparison is also made with previous years. This is followed by a description of how CRM is applied in the Church of Sweden's cooperation with its partners. Based on the account of complaint management in 2023, the lessons and challenges that can be identified are summarized. The report concludes with a summary of the

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prioritized measures that should be considered in the continued work with the Complaint handling at Church of Sweden.

Operating year 2023

In 2023, Act Church of Sweden was undergoing a reorganization that was launched in March. In connection with the reorganization, the implementation of a new team-based working method began. The work with CRM has not been directly affected by the changed working method, but in the work with a specific CRM case, we need to clarify how we maintain the principle that as few as possible should have insight into the case, which employees in the team should be informed and involved.

One of the two employees with the role of CRM focal point has changed position during the past year, which means that a new employee with similar skills has entered the work.

Introductory training in CRM and anti-corruption for new employees is combined with a full-day training course that is mandatory for all employees. This has proved to be a successful concept as the participants also share their own experience and knowledge during the training, which helps new employees to further understand the activities of Act Swedish Church. In 2023, a total of 33 employees have participated in the course. Training sessions will continue to be offered and the induction training will be incorporated into the full-day training.

In 2023, work continued mapping the Act Church of Sweden's complaint system based on the provisions of the GDPR (General Data Protection Regulation EU 2016/679). GDPR regulates, among other things, how personal data should be handled. This means that Act Church of Sweden must comply with the fundamental principles, ensure that the processing has a legal basis and inform the data subjects about how their personal data is processed. The mapping that took place in 2023 has shown that an exemption application to IMY (Integritetsskyddsmyndigheten) should be made. This is to ensure that the handling of sensitive cases within CRM can be considered justified based on the organization's efforts to maintain good quality. Church of Sweden has chosen to submit applications to IMY for other activities and these have a higher priority than CRM. This means that the CRM case is "in the queue" to be prepared for an application. The application procedure is handled by the legal department at the Church Office. In the meantime, it has been decided that CRM will continue with its activities on the basis that there is a solid basis for the application when it becomes relevant.

The extensive mapping has, among other things, resulted in all cases received by the complaints function since 2012 being transferred to the Church of Sweden's document management system, P360. There, CRM has its own protected domain to which only a few employees have access. This measure means that the data protection of sensitive material maintains a good level of security.

The cooperation agreements drawn up by the Church of Sweden for 2023 onwards have been tightened up in terms of what is expected of a partner. An adopted code of conduct must exist, which must also be made known in the organization. The Church of Sweden's zero tolerance for corruption must be fully

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shared by the partner organization. Active work to prevent sexual exploitation, sexual abuse and sexual harassment is also expected of our partners. For this, the partner organization must have a complaint system that enables staff, target groups and rights holders to report irregularities. If reports of violations of the code of conduct are received by the partner organization, they are contractually obliged to report this to Act Church of Sweden. To achieve what is expected from our partners, joint capacity building is of utmost importance. In this way, we both increase each other's knowledge and understanding while also building trust that enables the sharing of cases that may be of a sensitive nature.

In October and November 2023, two workshops were held in Tanzania with our five partners in the country. The aim was to build capacity and mutual understanding regarding a functioning complaints system related to the Code of Conduct. Follow-up of the activity plans that each organization developed during the training days will be followed up in 2024. The value of a regional representative who is present in the country and thus can follow up with partners during ongoing activities is evident. In previous years, training has also been carried out in Zimbabwe, which will also be followed up in 2024 when the regional representative is in the country.

In 2023, a first revision of the Act Church of Sweden Code of Conduct was made. The version has been used in trainings to get employees' input and suggestions for further improvements before the final revision and later decisions in the International Council in 2024.

An interim CRM handbook was decided by the Deputy Head of Department at the end of 2022, which will also be finalized when the Code of Conduct is decided by the International Council.

Complaints 2023

In 2023, a total of 16 (24, 2022) notifications were received by the Complaints Mechanism. Of these, 4 (9) did not fall under the remit of the function. In most cases, the complainant could be referred to other church entities, such as parishes or dioceses. Of the other 12 complaints handled under the Complaints Mechanism, all related to the activities of international partners. At the beginning of 2024, 2 cases are still open.

HOW DO COMPLAINTS REACH THE ACT CHURCH OF SWEDEN'S CRM?

In many cases, the reports that are received have employees of our partners as senders and have often been preceded by a discussion with a program coordinator or other employee of Act Church of Sweden. Rights holders rarely turn directly to Act Church of Sweden CRM with feedback or complaints, but the reports are usually received via employees of our partners.

In 2023, the notifications were distributed as follows:

- Six notifications were received from Act Church of Sweden staff, or the notification was preceded by consultation with Act Church of Sweden staff.
- Six reports were received from an external party.
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WHAT TYPE OF CASES REACH THE ACT CHURCH OF SWEDEN CRM?

Two reports relate to the activities of the Church of Sweden and the remaining thirteen relate to, or have an impact on, partners.

The categorization of reports in 2023 gives the following results:

Corruption	58% (7)	(cf. 3 in 2022; 6 in 2021)
Abuse of power by management or staff	17% (2)	(cf. 3 in 2022; 2 in 2021)
Deficiencies in the management at Act Church of Sweden	0% (0)	(cf. 0 in 2022; 1 in 2021)
Sexual abuse, exploitation and harassment (SEAH - Sexual Exploitation, Abuse and Harassment)	25% (3 cases)	(cf. 3 in 2022; 6 in 2021)

Corruption is defined as "the abuse of trust, power or position for improper gain", and includes embezzlement, conflict of interest and bribery. Corruption can occur for a variety of reasons, including lack of internal controls and weak management structures. Abuse of power usually refers to the improper use of power from a management position or as an employee of an organization. The last category of sexual abuse and exploitation is also related to the abuse of power and the exploitation of physical, psychological, or social advantage by someone in the organization.

The category of abuse of power by management or staff is often difficult to fully separate from the category of corruption. Moreover, abuse of power and conflicts of interest are part of the broader concept of corruption. However, it is still interesting to distinguish them by linking the financial aspect to what is referred to here as corruption. It is also the financial corruption, i.e. fraud and corruption, that is explicitly mentioned in the Church of Sweden's partner agreements.

CASES REPORTED TO INSTITUTIONAL DONORS

A number of Act Church of Sweden's programs and initiatives are co-financed by institutional donors, such as Sida, Radiohjälpen or the EU (ECHO). Many institutional donors require the Church of Sweden to inform the donor in case of suspicion of corruption or violation of codes of conduct. In addition, reporting of sexual abuse and exploitation is now a requirement from ECHO and the same applies to future agreements with Sida (2023 onwards).

In 2023, the number of cases reported to Sida was again low and Sida believes that there are unusually few corruption cases received from Act Church of Sweden.

Challenges and lessons learned

Reporting suspicions and complaints directly to the CRM focal point is essential to ensure the confidentiality of the case. Even if there is uncertainty about whether the case should be handled in CRM or not, the CRM focal point should be included in the conversation to bring clarity. In all sensitive cases, the number of people involved should be limited, which is also facilitated when the individual, who reports or otherwise becomes aware of a case, directly contacts the CRM Fp.

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The same code of conduct and CRM function applies to the events in Sweden in which Act Church of Sweden participates. Information about this should be clear to all who participate in conferences and similar events. In the planning of events that Act Church of Sweden is responsible for, a function for complaint management shall be included.

Confident partnerships increase the opportunities to work together on the code of conduct and CRM. One of the challenges is to get information on the reports partners receive and handle. Another challenge is that relatively few reports are received by Act Church of Sweden and partners, which Sida has also noted and would like to see an increase in reports. Act Church of Sweden has a long-term plan for capacity sharing with partners. The purpose of this is to build awareness and knowledge about responsibility and quality, where both the code of conduct and a functional Complaint system are important parts.

A major challenge for the Church of Sweden's CRM system is to find ways to handle the safety of the person reporting. In relation to its own staff, Act Church of Sweden as an employer has tools to manage their security in various ways. The difficulty in relation to external reporters is that our own ability to protect them is limited. Mainly because they have another employer in another country with other rules and another culture and we have no mandate there.

Conclusions and priorities for 2024

- In 2024, Act Church of Sweden Code of Conduct will be finalized, and the final version of the CRM handbook will be established.
- Annually recurring update sessions for managers and employees at Act Swedish Church in the Code of Conduct and CRM, as well as the anti-corruption work. The aim is to strengthen both awareness and knowledge of the current issues and to jointly define how we work with partners in terms of CRM and the Code of Conduct.
- As part of Act Church of Sweden's work on accountability and quality, continue to work on a long-term plan for how we, together with partners, find ways to increase capacity on the Code of Conduct and CRM. This also includes following up with partners and providing support in their implementation of the Code of Conduct and CRM.
- Increase our cooperation with the LWF and the ACT Alliance on issues related to the Code of Conduct and CRM, in particular how we can jointly build capacity with our partners.
- To establish a list of people who can be engaged for various investigative tasks in our program countries, preferably local resources in each region.