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Annual Report 2024

Act Church of Sweden Complaints management

Introduction

Complaints Response Mechanism (CRM) is an essential part of Act Church of Sweden's work on quality assurance. Act Church of Sweden is verified according to the Core Humanitarian Standard on Quality and Accountability (CHS), where a complaints function is one of the basic requirements.

The CRM Focal Point receives and ensures that cases are followed up in accordance with the Act Church of Sweden CRM Handbook. The CRM Focal Point prepares and presents cases to 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
- CRM officers Act Church of Sweden.

This report presents the 2024 financial year of Act Church of Sweden's complaints management. After a brief presentation of Act Church of Sweden's CRM, the complaints received during the year and the type of problems that were raised are presented. A comparison is also made with previous years. This is followed by a description of how the CRM is applied in Act Church of Sweden's interaction with its partners. Based on the report on the handling of complaints in 2024, the lessons learned, and challenges identified are summarised. The report concludes with a summary of the prioritised measures that should be considered in the continued work with Act Church of Sweden's CRM.

Financial year 2024

A full-day CRM and Anti-Corruption training for new employees together with employees who have not attended the training, as well as those employees who attended to update their knowledge, 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 the Act Church of Sweden.

In 2024, a total of 36 staff members have participated in the course. Training sessions will continue to be offered as the induction training is incorporated into the full-day training programme, which has proved successful.

In September, a workshop was held in Ethiopia with five partners from Ethiopia, South Sudan, Uganda and Kenya. 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 developed by each organisation during the training days will be followed up in 2025. Act Church of Sweden regional representative in the country enables continued follow-up in close communication with our partners.

In 2024, the International Council of Churches approved the revised version of the Act Church of Sweden's Code of Conduct. The work on the revision has been extensive and employees in the International Department have been able to give their feedback on the code of conduct. During the process, the code has also been used in training to get employees' input and suggestions for improvements for final revision and later decisions. The updated Code of Conduct is published on the website of Act Church of Sweden, in Vips Online and on Teams - Kyrkokansliet-ORG.

An interim CRM handbook, based on the previous Guidelines for handling complaints, was adopted by the Deputy Head of Department at the end of 2022. With the approval of the Code of Conduct of Act Church of Sweden, work began on finalising an updated version of the interim handbook. The work on the manual has taken place in a small working group. A draft was reviewed by colleagues (both in Sweden and abroad) and managers in the International Department. The working language of the CRM manual was English. After approval by the head of department, the manual was also translated into Swedish and Spanish.

Complaints 2024

In 2024, a total of 16 (16, 2023) complaints were received. Of these, 6 (4) did not fall within 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 10 complaints handled by the complaints function, all were related to the activities of international partners.

How do complaints reach the Church of Sweden's CRM?

In many cases, the complaints that are received are from employees of partner organisations and have often been preceded by discussions with programme coordinators or other employees of Act Church of Sweden. Rights holders rarely contact Act Church of Sweden's CRM directly with feedback or complaints, but those complaints are usually received via employees of our partners.

In 2024, the complaints have been distributed as follows:

- Six complaints were received from Act Church of Sweden staff, or the notification was preceded by consultation with Act Church of Sweden staff.
- Four complaints were received from external parties.

The categorisation of reports in 2024 gives the following results:

Corruption	50% (5) (cf. 7 in 2023; 3 in 2021)
Abuse of power by management or staff	20% (2) (cf. 2 in 2023; 3 in 2021)
Deficiencies by Act Svenska kyrkan	10% (1) (cf. 0 in 2023; 0 in 2021)
Sexual abuse, exploitation and harassment (SEAH) ¹	20% (2) (cf. 3 in 2023; 3 in 2021)

¹ Sexual Exploitation, Abuse and Harassment

Corruption is defined as ‘the abuse of trust, power or position for improper gain’, and includes embezzlement, conflict of interest and bribery. Corruption can arise for several reasons, including a lack of internal controls and weak management structures. Abuse of power is usually when someone improperly uses their position of power from a management position or as an employee of an organisation. The last category of sexual abuse and exploitation is also related to the abuse of power and the use of physical, psychological or social advantage by someone in the organisation.

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 by definition part of the broader concept of corruption. However, it is still interesting to distinguish these, by linking the financial aspect to what is referred to here as corruption.

Cases reported to institutional donors

Several Act Church of Sweden's programmes and operations are co-financed by institutional donors, such as Sida, Radio Aid or the EU (ECHO). Many institutional donors have requirements for Act Church of Sweden to inform the donor in the event of suspected corruption or breaches of codes of conduct. In addition, reporting of sexual abuse and exploitation is now a requirement from ECHO and the same applies to agreements with Sida.

Challenges and lessons learnt

Act Church of Sweden is verified by CHS (Core Humanitarian Standards), a global alliance that aims to improve aid work around the world. In an audit conducted in 2024, found out that employees in the International Department have not fully understood our work with CRM. It is often employees who, in contact with partners, become aware of cases that need to be handled in the CRM function, so it is of the utmost importance to have a good understanding of how CRM works. Despite annual training in the Code of Conduct, anti-corruption and CRM, it turns out that there are shortcomings, which we need to address. A plan for this has been approved and is being implemented in 2025.

In the events taken place in Sweden, that Act Church of Sweden organises, Act Church of Sweden's Code of Conduct shall also be applied. Participants in the events shall be informed of this in a way that also enables them to confirm the information. In events organised by Act Church of Sweden Act, a complaint function shall be available.

A major challenge for Act Church of Sweden's CRM system is to find ways of managing the safety of the person making the report. In relation to its own staff, Act Church of Sweden as an employer has tools to manage their safety in different ways. The difficulty in relation to external whistleblowers is that our own ability to protect is limited. Above all because they have another employer in another country with different rules and a different culture and we have no mandate there.

Conclusions and Priorities for 2025

- In 2025, Act Church of Sweden's website regarding the complaints function will be updated in Swedish, English and Spanish. The new CRM handbook will also be published at the same time. The update of the website will be coordinated with the work being done on responsibility and quality for international activities.
- Training day for all managers in the department on our revised Code of Conduct, anti-corruption and complaint's function. Continue training employees at Act Church of Sweden in the Code of Conduct and CRM, as well as 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 Code of Conduct.

- During the spring 2025, the Sections of the department will be offered a workshop aimed at updating our common responsibilities regarding the Code of Conduct and its follow-up.
- Meetings will take place in 2025, in each section of the International Department, where the Code of Conduct and the complaints function will be updated again and where experience sharing will be a source of learning.
- As part of Act Church of Sweden's work on Quality and Accountability, we will continue working on a long-term plan on how we, together with partners, can find ways to increase capacity around the Code of Conduct and CRM. This also includes following up with partners and providing support in their implementation work of the Code of Conduct and CRM.
- Increase our cooperation with the LWF and the ACT Alliance on Code of Conduct and CRM issues, in particular how we can build capacity together with our partners.