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Handbook for handling complaints - Act Church of Sweden			0(13)
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# 1. Introduction and Purpose

Act Church of Sweden (hereafter Act CoS) is the Church of Sweden's International humanitarian and development work. Within the Central Office, the International Department is responsible for the work and administration of Act CoS. These guidelines describe how Act CoS fulfils its Quality and Accountability Commitment 7: **Work with complaints, safeguarding, and against corruption** through a Complaints and Response Mechanism (CRM).

The Director of Act CoS is responsible, with the support of the Senior Management Team of Act CoS for the content of the handbook and ensures its implementation. Act CoS's CRM Focal point is responsible for ensuring that every complaint is managed and documented in accordance with this handbook. The handbook and its annexes are reviewed on a regular basis. When a complaint is received, the CRM Focal points make an initial assessment based on this handbook.

## 1.1. Purpose of the Complaints and Response Mechanism (CRM)

Act CoS is committed to promoting changes in unequal structures, ensuring that rights holders are informed, know their rights, are treated with respect, and can complain if commitments are not fulfilled. The CRM ensures accountability and continuous improvement by enabling rights holders and stakeholders to raise concerns, provide feedback, and report misconduct. It promotes transparency, respect, and awareness of rights, while helping the organization improve its work, reduce inefficiencies, and prevent misuse of resources through responsive and structured complaint handling.

The purpose of this handbook is to describe how Act CoS's CRM is designed and how the complaints handling process is carried out.

## 1.2. Guiding principles

The Complaints and Response Mechanism (CRM) of Act Church of Sweden shall be implemented in accordance with the following guiding principles:

**Fairness - complaints handled impartially and consistently.**

All complaints are handled fairly, impartially, and consistently. Processes for receipt, assessment, investigation, and decision-making shall be based on objective criteria. All parties shall be treated with respect and without discrimination.

**Confidentiality - information is protected and shared only when necessary.**

All information related to complaints shall be handled with strict confidentiality. Identities of complainants and others involved shall be protected. Information shall only be shared when necessary and in accordance with applicable policies, legal frameworks, and consent. All persons involved in complaint handling are bound by confidentiality obligations.

**Do no harm - safety and dignity are prioritised**

Complaint handling shall prioritise the safety and dignity of all individuals. Measures shall be taken to prevent harm at all stages. This includes preventing reprisals, re-traumatisation, and other adverse consequences for those involved.

**Accessibility - inclusive mechanisms and multiple safe channels**

The CRM shall be accessible and inclusive for all stakeholders. Information on how to raise a complaint shall be clear and actively communicated. Multiple safe channels shall be available. Complaints may be submitted anonymously.

## 1.3. Link to Act Church of Sweden guidelines and policies

The Complaints and Response Mechanism is part of Act Church of Sweden's commitment to the [Quality and Accountability Framework](#). It also relates to the [Code of Conduct \(CoC\) for Act Church of Sweden](#), [anti-corruption policy for the Church of Sweden](#) at the national level and the Central Office's work environment policy. And, since Act CoS is a member of the ACT Alliance, the handbook is also harmonised with [the ACT Alliance Code of Conduct policy and the ACT Alliance Complaints policy](#).

## 2. Scope and Applicability of the CRM

The CRM applies to all work carried out by Act CoS or supported by Act CoS and to all signatories of Act CoS's Code of Conduct.

### 2.1. Who can raise a complaint?

Anyone who participates in or is affected by actions that Act CoS carries out by itself or together with a partner can make a complaint. This definition includes actions that Act CoS finances or performs jointly with dioceses and parishes within Church of Sweden. Third parties, or observers, that suspect wrongdoings in Act CoS operations can also raise a concern using the CRM system.

### 2.2. Duty to report

All signatories of the Act CoS's Code of Conduct are obliged to report any knowledge or suspicion of violations of the same. In addition, all employees working within Act CoS are obliged to report any knowledge or suspicion of a concern about Partners non-compliance to the obligations stipulated in agreements regarding corruption and other irregularities, sexual exploitation, abuse, and harassment.

### 2.3. What kind of complaints are handled?

Act CoS handles complaints regarding compliance with commitments defined in the organisation's *Quality and Accountability Framework* and Code of Conduct. The complaints dealt with include but are not limited to:

- Suspicion or observation/experience of a violation of Act CoS's CoC.
- Perceived shortcomings in Act CoS's or partner's contractual compliance, e.g. handling commitments within a partner agreement, project agreement, overall cooperation agreement, or other agreements.

### 2.4. Diverse types of complaints

Act CoS differentiates between feedback and complaints. Feedback provides suggestions or opinions to improve our work and does not require an action in response. Complaints express dissatisfaction or a concern that Act CoS has not met its commitments, and it requires an action in response.

The category of complaints can be divided as follows:

***Operational complaints*** refer to deficiencies in the implementation of Act CoS's commitments, activities, and processes.

***Sensitive complaints*** refer to any knowledge of suspicion of or concern about violations of Act CoS's Code of Conduct. It includes allegations of corruption, abuse of power, sextortion, sexual harassment, abuse and exploitation (SEAH), and exploitation of and failure to protect children. Reports of exploitation and abuse, especially of a sexual nature, and complaints concerning children shall be prioritised. The basic principle is that suspicions of violations of local or Swedish legislation are reported to the police.

***Malicious complaint*** is an accusation made knowingly on false grounds, with the intent of causing harm to someone else and/or for its own interest. If discovered during an ongoing investigation, that a complaint was malicious, the investigation shall be terminated immediately, and the subject of complaint be cleared of all suspicion. Complaints made in good faith that cannot be substantiated are not considered malicious. Malicious complaints made by Act CoS's employees may lead to disciplinary measures.

### 2.5. Complaints not handled

If the CRM focal point considers that a complaint falls outside the scope of CRM, the complainant will be informed that the case cannot be handled.

Act CoS CRM does not handle the following types of complaints relating to:

- Actions and activities that are not financed by or have a valid agreement with Act CoS.
- International projects or collaborations that dioceses or congregations in the Church of Sweden run themselves.
- Complaints from Act CoS's personnel related to employment conditions, work environment, and management issues. These complaints shall be made to the line manager or to the HR department at Central Office.

### 3. Accessing the CRM

#### 3.1. When to make a complaint?

A complaint should be submitted as soon as possible after the problem is discovered. Complaints regarding shortcomings in the implementation of operations should be submitted during ongoing work and preferably not later than one year after the end of the project regarding sensitive complaints. Act CoS shall handle all matters as far as possible, and without time limit.

#### 3.2 How to make a complaint?

In projects financed by Act CoS, partners shall, according to the agreement, always inform Act CoS about sensitive complaints received by them. All personal data shall be anonymised, and information relating to such matters shall be handled confidentially and only sent to Act CoS's CRM. This also applies in cases where partners themselves have a CRM function and investigate, or have already investigated, the complaint.

On the section [I have a Complaint](#) of the website of Act CoS there is information on how to submit a complaint. Employees working within Act CoS are responsible of sharing information about Act CoS complaint system. Complaints shall be sent to the Act CoS's CRM focal point according to the options stated below:

- *E-mail:* [complaints.internationalwork@svenskakyrkan.se](mailto:complaints.internationalwork@svenskakyrkan.se)
- *Phone/WhatsApp/Signal* +46 703 98 62 86
- *Letter:* Act CoS Complaints Focal Point, Central Office, SE-751 70 Uppsala, Sweden.
- Personal conversation with any staff member of Act CoS, who has the obligation to forward the complaint to the CRM focal point for analysis and decision.

Information about dissatisfactions or problems can be received in personal meetings with employees and representatives from Act Church of Sweden. The complaint shall be forwarded to the CRM focal point or to the relevant manager as soon as possible.

Act CoS is a member of the ACT Alliance,<sup>1</sup> the Core Humanitarian Standard Alliance<sup>2</sup> (CHS) and the Lutheran World Federation (LWF).<sup>3</sup> Complaints relating to Act CoS can also be submitted to these international organisations.

#### 3.3. Information needed

The template for submitting a complaint in Annex 1 provides guidance on what information is useful to share when submitting a complaint. Anyone wishing to file a complaint should provide their contact details, enabling the CRM focal point at Act CoS to contact them for further information or to provide feedback.

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<sup>1</sup> E-mail: [complaintsbox@actalliance.org](mailto:complaintsbox@actalliance.org)

Website: <https://actalliance.org/complaints>.

<sup>2</sup> E-mail: [complaints@chsalliance.org](mailto:complaints@chsalliance.org)

Website: <https://www.chsalliance.org/complaints/>.

<sup>3</sup> Website: <https://www.lutheranworld.org/complaints-submission-form>

Act CoS also handles complaints coming from an anonymous source. To submit a complaint without revealing the complainant, the complaint can be sent as a letter.

### **3.4. Protection of complainants and whistleblowers**

Act CoS wants to create an environment that enables and encourages all stakeholders to express concerns without risking retaliation or unfair treatment. In some cases, if the complainant gives their consent, information that identifies them can be handed over to another unit within the International Department or to another organisation.

Act CoS and partners must under no circumstances hinder anyone, or subject anyone to reprisals, because of a complaint. Retaliation can, for example, be ostracism, dismissal, non-promotion, changed tasks or working hours, no training or unfair treatment. Nevertheless, if the complainant should be exposed to any form of reprisals, harassment, or risk of losing employment or employment benefits, Act CoS will seek the best possible solution within the framework of applicable laws and regulations.

### **3.5. Confidentiality and non-disclosure**

The Church Order of Church of Sweden prohibits the disclosure of information from the CRM about individuals or partner organisations. This prohibition applies when it is unclear whether disclosure could harm the organisation, the individual or someone close to them. The Church Order defines that cooperating organisations are all those that cooperate with Act CoS, regardless of a formal contractual relationship or not.

The identity of those involved in an investigation are kept confidential and shared only when necessary and after consent from the person involved. All employees involved in handling and/or investigating a complaint are subject to confidentiality and sign a written oath of confidentiality to this effect. Even those who are involved in a CRM investigation without being employees of the Church of Sweden shall sign a non-disclosure agreement. Refusal to sign means that the person cannot be involved in the investigation.

Exceptions to the prohibition to disclose information are:

- When it is necessary according to national and/or international legislation.
- When it is required to hire a special advisor or assistance is needed in sensitive matters.<sup>4</sup>

## **4. Working with Partners and Consortia**

Act CoS continuously works with partners to keep them informed about the obligation to have a Code of conduct and a Complaint handling system.

In agreements between Act CoS and partners, there is a requirement that partners must have a CoC and that complaints are addressed. Act CoS strives for all target groups and rights holders to be informed and understand their rights so that they can complain.

### **4.1. Complaints related to partners**

Complaints concerning a partner will, as a general approach, be forwarded to the partner organisation and handled in accordance with the partner's complaints system. Act CoS will ask the complainant for consent to this. However, in some cases, the person may prefer to contact the partner in question themselves. When Act CoS forwards a complaint, the CRM focal point will follow up on how the complaint is handled by the partner organisation until the case is closed.

If the complainant prefers to remain anonymous and/or requests that the complaint is not forwarded to the concerned organisation, the CRM committee will decide whether to proceed with an investigation or close the case without one.

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<sup>4</sup> [Church Rules of Procedure 54 Chapter § 15b.](#)

If the CRM Committee concludes that the partner organisation is unable or unwilling to investigate the complaint, Act CoS may decide to investigate the complaint itself. In this case, a partner organisation with a valid Cooperation Agreement would be obliged to cooperate with the investigation.

## **4.2. Joint investigations**

If a complaint is received by several organizations (usually donor organizations), Act CoS will endeavor to carry out joint investigations with those. Decisions to carry out joint investigations are decided by the CRM committee. When a joint investigation is carried out, all parties involved shall enter into a written agreement regarding the process and how the results of the investigation should be handled

## **4.3. Handling complaints within a consortium**

When Act CoS is part of a consortium, it must ensure that the consortium agreement includes details of how complaints will be handled in the context of the project or programme.

# **5. Roles, Responsibilities and Mandates**

The CRM Focal Point manages complaints processes. The CRM Committee oversees decisions and sensitive cases.

## **5.1. CRM Focal point**

Act CoS' CRM Focal point main responsibility is to receive and ensure that cases are followed up in accordance with this CRM handbook.

The CRM Focal point:

- Receive complaints and acknowledges the receipt of the complaints
- Assess the complaint together with another CRM focal point.
- Request more information if needed
- Document the complaint securely and in a timely manner
- Inform the CRM Committee. Prepare and prioritize matters for Committee review, coordinate with Committee members, and document all decisions
- If applicable, inform, keep updated and reports to the relevant institutional back donor, on ongoing CRM cases and the outcome of the investigation in accordance with their requirements.
- Reports annually on CRM cases and other actions to the CRM Committee
- Decides who need to receive information about ongoing cases in accordance with this manual.
- Inform managers when a preliminary or full investigation is to be carried out.
- Formulate, implement, follow-up and report an annual action plan to ensure the constant improvement of the CRM system
- Work actively to increase visibility and accessibility of the CRM and raising awareness of its importance.
- Being available for learning sessions and consultations about CRM issues for partners.
- Strategic coordination with relevant stakeholders, such as ACT Alliance, LWF and others.

## **5.2. CRM responsibilities at Regional Units**

Regional units for Partner Collaboration are responsible for the operational work of Act CoS. They are closest to partners and rights holders and thus play a key role for the Act CoS CRM. Each regional unit will appoint a person responsible to support the Act CoS CRM system. Operational complaints (non-sensitive) and deviations can be handled by Regional Units. Regional managers and/or the Regional CRM officer will be responsible to document these cases and share them either with the CRM focal point or Deviations Monitoring System team at Central Office.

The CRM regional officer:

- Provides support for all staff members in the regional unit on issues related to CRM and monitoring of deviations.
- Take part in assessing complaints in the region together with the CRM focal point. Supports the CRM focal point on the decision on how to proceed and who will be primarily responsible for following up on the case.
- Supports the implementation of the CRM annual action plan
- Work actively to increase visibility and accessibility of the CRM and raising awareness of its importance.
- Being available for learning sessions and consultations about CRM issues for partners

### **5.3. CRM committee**

It is composed of by:

Director Act CoS or whoever he or she appoints.  
Head of the section for Partner collaboration  
Head of the section for Finance, Management and Operations support  
Head of unit for Finance and Internal control  
CRM Focal point (with no power for decision)

The quorum for the Committee is three persons, the Committee:

- Leads and decides on the management of all accepted complaints.
- Take decisions on sensitive complaints when three persons are present and either the Director of Act CoS or the Head of the section for Finance, Management and Operations support participates. The CRM Committee may call on relevant expertise to get further information on a specific case.
- If relevant, the committee will decide whether to call on an expert and share minimum, anonymised information. Decisions will be made and implemented based on the analysis of complaints and the conclusions of an investigation.
- Decides whether payments to partners need to be suspended or resumed. In some cases, this can override the line managers' previous decisions. To safeguard the interests of the department in the event of such a disagreement between the parties, the Director Act CoS, or the person he or she delegates to, shall have the final say in the matter.

## **6. Complaints handling procedure**

### **6.1. Receipt, acknowledgement and initial assessment of complaints**

All complaints are acknowledged within two working days. The CRM Focal point makes an initial assessment of all received complaints based on the instructions in the CRM handbook.

### **6.2. Handling of non-sensitive complaints, feedback, and deviations**

Act CoS encourages its employees, partners, target groups, and other stakeholders to raise non-sensitive complaints and/or feedback informally as close to the time of the incident as possible. Such complaints should be handled together with the employees concerned and raised at the operational level together with the relevant manager. Non-sensitive complaints and feedback concerning shortcomings in the organisation will be forwarded to the employee(s) managing the concerned project at Act CoS.

### **6.3. Handling of sensitive complaints**

If the case is in scope according to the CRM handbook the CRM Focal point prepares the case for the CRM committee. The committee decides how the complaint shall be handled and whether the matter shall lead to an investigation.

## **6.4. Investigation process**

The investigation is conducted in accordance with the *CHS Alliance's Guidelines for Investigations*. All investigations are followed up as soon as possible, but the time limit for the investigation and submission of the investigation report is determined based on the nature of the case. The complainant should be informed about the expected time limit of the investigation.

## **6.5. Decision making and communication of results**

The assigned investigator will present the findings and recommendations from the investigation to the CRM committee. The committee will decide based on the results of the investigation, considering an analysis of the context, conclusions of the investigation and the investigation report.

The CRM Focal point communicates the conclusions of the investigation to the complainant as soon as possible after the investigation is complete and a decision on action has been made in the CRM committee. The complainant will not be informed of the details of the investigation but will be informed of the results.

Reports of exploitation and abuse, especially of a sexual nature, and complaints concerning children shall be prioritised. Such complaints are handled in accordance with applicable legislation.

## **6.6. Review and appeal of decision**

If the complainant is dissatisfied with the CRM committee's decision, the complainant can send a request for reconsideration of the decision. The CRM committee will assess this request and respond to the complainant. This only happens if new information has been received.

## **6.7. Protection of all involved parties**

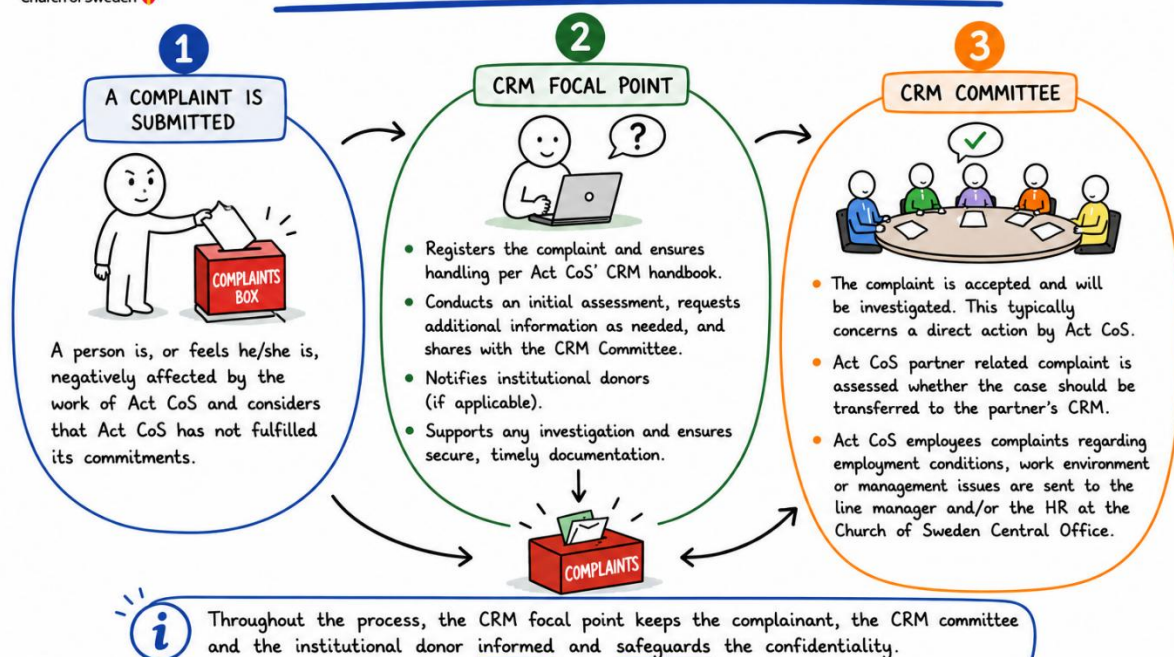
The purpose of handling matters confidentially is to protect all parties involved: the informant/complainant, survivors, other victims and witnesses, and the accused person(s). The CRM Focal Point identifies risks to these individuals before, during and after the investigation. Act CoS shall be prepared to provide additional support to those involved if needed in relation to the matter. This decision is made by the CRM committee.

## **6.8. Closing and documentation of complaints**

When a complaint has been fully investigated and resolved, it shall be formally closed in the CRM system accordingly. All relevant actions, decisions, communication, and outcomes must be documented accurately and transparently and in accordance with the Church of Sweden's internal guidelines and applicable data protection regulations. The documentation shall ensure traceability, accountability, and the possibility of follow-up, records shall be retained according to established retention and archiving policies.

When a complaint related to a partner indicates serious organizational risks, the CRM focal point must share those risks with the programme officer responsible of the partner collaboration. The program officer must document this in Vips online under the organizations page, making sure of not revealing sensitive data.

## ACT CHURCH OF SWEDEN COMPLAINTS HANDLING PROCESS



### 7. Outcomes and disciplinary measures

If substantiated, measures may include disciplinary action or reporting to the relevant authorities in accordance with applicable legislation. This may include filing a police report or considering disciplinary sanctions within the framework of employment or assignments.

If a partner has breached an obligation stipulated in the agreements regarding prevention and reporting of corruption or other irregularities, measures can be taken accordingly. This may involve deferred, reduced, or cancelled disbursements, or termination of agreements. Act CoS will initiate a dialogue with the partner and follow up on how the organisation handles the matter if it turns out that employees of a partner have violated their code of conduct.

### 8. Follow up and lessons learned

Annual reporting ensures continuous improvement and learning. An annual report for CRM is written by the CRM Focal point and shall contain a compilation of the number and type of complaints, as well as, where applicable, general information about how the case was handled and what lessons the case handling provided. The report is public, but all confidential information, including personal data, is omitted.

The annual report is approved by the CRM Committee and then presented to the management of Act CoS, the International Council and the General Secretary at Church of Sweden; and when pertinent to back donors. As part of the learning, Act CoS's staff and partners will have access to the annual report, which is published on the website of Church of Sweden.

Act CoS shall also document good examples from partners' ways of handling complaints, with the aim of improving their own routines and sharing them with other partners. All confidential information, including personal data, is omitted.

## 9. Key terms and definitions

**ACT Alliance** (Action by Churches together) is a global alliance of 140 churches and faith-based organisations working in over 120 countries. Act CoS is a member of the ACT Alliance.

**Act CoS** is the official name of The Church of Sweden's work with international Mission and Diaconia. Within the Central Office, the International Department is responsible for Act CoS.

**Children** are persons that is under the age of 18.

**Complainant** is the person submitting a complaint, either on his or her own behalf or on behalf of another person

**Confidentiality** is keeping information secret and private.

**Consortium** is a contractually regulated association of independent legal persons who have joined together for a specific and common purpose.

**Corruption** is the abuse of trust, power, or position for improper gain.

**Cooperating organisations** are organisations that Act CoS collaborates with within international operations, regardless of whether there is a formal contractual relationship or is based on a conclusive collaboration.

**Contractual partners** are all sister churches and organisations with which Act CoS establishes agreements on funding and cooperation. In certain contexts, the term partner or partner organisation is also used.

**CRM Focal Point** is a staff member that receives and ensures that complaints are followed up in accordance with Act CoS's CRM handbook.

**Elected representative** is an elected commissioner of a commission or board of Church of Sweden on national level. They are included in the CRM when they have approved and signed the *Code of Conduct (CoC)*. All commissioners can complain about Act Church of Sweden's operations.

**Investigation** is a systematic process by which information is gathered to prove or disprove a complaint.

**Non-disclosure** means a limitation in the public's right to see and have access to public documents with the support of the state or intra-church principle of public access to information. If someone requests access to documents related to CRM, Act CoS must assess in each individual case whether the requested document can be disclosed in full or in part (non-disclosure test the document). Act CoS can only refuse to disclose information under certain circumstances specified in the law and church regulations, that is, when there is a reason to refuse disclosure due to non-disclosure. Act CoS's judgment on the release of documents can be reviewed by the Church of Sweden's Appeal Board, which, with the support of Act CoS, must take a position on questions of this kind.<sup>5</sup>

**Operational complaints** refer to deficiencies in the implementation of Act CoS's commitments, activities, and processes.

**Protection** is an environment created based on human rights, refugee, and international humanitarian law, that promotes respect for people, prevents and/or mitigates the immediate effects of a specific pattern of abuse, and restores dignified living conditions through reparation, restitution, and rehabilitation.

**Rights holder** is a concept that assumes that all people have the right to have their voice heard and considered. The participation of rights holder's rests on a theoretical framework in the Convention on Human Rights and in the Convention on the Rights of the Child.

**Sextortion** means that a person abuses his or her position of power to gain access to sexual services in exchange for a service or benefit that he or she can grant or withhold by virtue of his or her position.

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<sup>5</sup> [Church Rules of Procedure Chapter 54 § 8a.](#)

**Signatories** are those who have signed the Act CoS Code of Conduct. Those who are representing Act CoS, employees, as well as elected members of the Church Council. Persons appointed to various positions under the Church Council (holders of positions of trust) and other persons who are part of groups/delegations appointed by the Church Council or on delegation from the Church Council. The Code of Conduct also applies to other persons who have signed it.

**Survivor** is a person who has been subjected to abuse or discrimination.

**The Code of Conduct (CoC)** describes which rules personnel shall adhere to. An employee of Act CoS approves and sign two codes of conduct: the Church of Sweden's' and Act CoS's Code of Conduct. This takes place at the commencement of employment. Other categories or personnel can also be asked to approve and sign Act CoS's CoC. Among these are e.g. consultants, interns, volunteers, those accompanying seconded staff as well as elected representatives in the Church Board and the International Council. Act CoS requires in agreements that all cooperating partners, with whom they have cooperation agreements, have a code of conduct which they apply for their employees.

**Witness** is someone who witnessed the events that led to the complaint and submitted evidence in the investigation.

## 10. Abbreviations

**ACT Alliance** – Action by Churches Together Alliance

**CHS** – Core Humanitarian Standards

**CRM** – Complaints and Response Mechanism

**DMS** – Deviations Monitoring System

**LWF** – Lutheran World Federation

**WCC** World Council of Churches

**SEAH** – Sexual Exploitation, Abuse and harassment

## Annex 1. Template for submitting a complaint

Send to:

E-mail: [complaints.internationalwork@svenskakyrkan.se](mailto:complaints.internationalwork@svenskakyrkan.se)

Postal address: Complaints Focal Point, Act Church of Sweden, Central Office, SE-751 70 Uppsala, Sweden

### ***A: GENERAL INFORMATION***

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NAME OF THE PERSON OR ORGANISATION FILING THE COMPLAINT:

	ARE YOU 18 YEARS OLD?
E-MAIL	TELEPHONE

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### ***B: DESCRIPTION OF THE COMPLAINT/PROBLEM***

---

NAME OF THE PERSON, ORGANISATION AND/OR PROJECT THAT THE COMPLAINT RELATES TO

---

TIME OF THE INCIDENT/PROBLEM

---

LOCATION OF THE INCIDENT/PROBLEM

---

BRIEF DESCRIPTION OF THE INCIDENT/PROBLEM

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### ***C: DESCRIBE THE MEASURES THAT HAVE BEEN TAKEN***

Include information about whether this complaint has been submitted to other organisations and whether any measures have been taken, about medical help and/or psychosocial support, as well as whether the police have been informed.

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BRIEF DESCRIPTION OF THE MEASURES TAKEN

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#### ***D: NEED FOR REFERRAL TO THIRD PARTY***

State whether you believe there is a need for referral to a third party, for example, some form of medical, psychosocial or legal support for the people involved:

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BRIEF DESCRIPTION

Date: \_\_\_\_\_ Name: \_\_\_\_\_

In connection with the filing of this complaint to the Church of Sweden, we will process your personal data. The faith community of the Church of Sweden (org.nr 252002–6135) is the controller of the personal data for the processing of personal data within the framework of Act Church of Sweden's CRM (Complaint Response Mechanism), which this complaint is part of. The legal basis for this processing of personal data is legitimate interest, agreement or legal obligation.

Your privacy is important to us; therefore, we put security in focus. We take measures to protect your data in accordance with the General Data Protection Regulation (GDPR) and established governing documents for information security. This means that we protect your data with both technical solutions and organisational routines and rules, for example, authorisation control adapted to the nature of personal data processing is applied.

The faith community of the Church of Sweden saves your personal data only as long as it is necessary to fulfil the purposes of the processing, or as long as we have to store it by law. Your data is then deleted or de-identified in a secure manner, so that it can no longer be linked to you.

If, after reporting, you want to have your personal data deleted, contact [complaints.internationalwork@svenskakyrkan.se](mailto:complaints.internationalwork@svenskakyrkan.se).

If you have questions about how we process your personal data, you can contact the Central Office's data protection officer before and after submitting a complaint at: [kyrkokansliet.dataskyddsbud@svenskakyrkan.se](mailto:kyrkokansliet.dataskyddsbud@svenskakyrkan.se).

If you think that we are processing personal data about you in a way that violates the data protection regulation (GDPR), you can submit a complaint to the Swedish Data Protection Authority (IMY) via this link: <https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal/>.