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## Guidelines for handling complaints for the Church of Sweden International work

### 1. Introduction

The vision for the Church of Sweden's International work is life in the Realm of God, a healed Creation and humanity in communion, justice, freedom and peace.<sup>1</sup> The Church of Sweden bases its international work as part of the worldwide ecumenical movement. The Church of Sweden International work includes church cooperation, development cooperation, humanitarian aid, policy dialogue and mobilisation, support and fundraising.

Our starting point is a life-empowering theology that is expressed through the active choice to be present with those living in vulnerable situations. The Church of Sweden International work aims to achieve positive change together with people who live in vulnerable situations around the world.

The Church of Sweden International work believes in delivering a high quality of work and results. We want to shift the power imbalance to ensure that rights holders and target groups are informed, know their rights, are treated with respect, can make decisions on the work that affects their lives and can complain if we do not meet our commitments. The Church of Sweden International work endeavours to ensure that our commitments to quality and accountability permeate in all the activities we undertake. Further information on our commitments is available in the Quality and accountability framework for the Church of Sweden International work<sup>2</sup>.

These guidelines detail how we address our quality and accountability commitment to complaints handling, through a complaints and response mechanism (CRM). The stakeholders of the Church of Sweden's International work are entitled to give feedback and complain if we do not fulfil our commitments. In this way, we can improve the quality of our work, reduce inefficiencies and prevent misconduct and/or unlawful appropriation of the resources we manage. In addition, the CRM contributes to greater ownership among our stakeholders as they can raise perceived shortcomings or concerns in our activities, procedures and conduct with the knowledge that we will respond.

### 2. Scope and limitations of the guidelines

The Guidelines for complaints handling applies to the work performed and/or financially supported by the Church of Sweden International work. This includes our activities, processes and conduct of staff and partner staff. The Guidelines clarify our CRM by detailing who can complain, what type of complaints can be made, how to complain, the procedure for handling complaints and investigations,

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<sup>1</sup> Our theology: A life-empowering faith as our driving force – steering document (Ks 2013/0272, approved on 29 April 2013), describes in more detail the life-affirming theology on which the Church of Sweden's international work is based.

<sup>2</sup> <https://www.svenskakyrkan.se/internationelltarbete/complaints>

disciplinary action and follow-up and learning. It is the intention of the Church of Sweden International work to handle complaints in a fair, appropriate and prompt manner.

The Guidelines are linked to the Quality and accountability framework, the National level and International work Codes of conduct, the Policy on anti-corruption and to internal systems for handling complaints from our own staff regarding employment and work environment issues. As the Church of Sweden International work is a member of the ACT Alliance, the guidelines are also aligned with the ACT Complaints Policy.

## 2.1 Types of complaints

The Church of Sweden International work endeavours to ensure that we have transparent and accountable approach in all our interactions. For this reason, we encourage our staff, partners, target groups and other stakeholders to address non-sensitive complaints informally and as close to the concern in question in order to resolve the issues as quickly and efficiently as possible. Lodging a complaint through the CRM should be seen as a last resort when a problem cannot be resolved in any other manner. However, certain complaints must be handled through the CRM.

Types of complaints include:

- **Non-sensitive complaints about shortcomings in the performance of activities and processes**, for example the Church of Sweden International work not fulfilling the commitments we have made in relation to our partners, target groups, donors, etc. in agreements, principles, standards, guidelines and routines.
- **Sensitive complaints** on the behaviour of staff or partner's staff that is in breach of the Church of Sweden's National level and International work Codes of conduct, including complaints regarding corruption, fraud, sexual exploitation and abuse, and not safeguarding children<sup>3</sup>.

## 2.2 Who can make a complaint?

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

1. Anyone who participates in or is impacted by projects that the Church of Sweden International work carries out itself or with a partner<sup>4</sup>.
2. The Church of Sweden International work's partners and their staff.
3. Donors, volunteers and others involved in or affected by the Church of Sweden's International work.
4. Staff. Staff refers to but is not limited to all permanent and temporary staff, their dependents, interns, consultants, observers, volunteers, elected representatives and all individuals working for or representing the organisation.

## 2.3 Obligation to report

All Church of Sweden International work staff are required to report any knowledge, concerns or substantial suspicions of breaches of the Code of conduct for the Church of Sweden's International work following this guideline. Priests and Deacons may however be bound by a vow of silence by the Church. Failure to disclose or knowingly withhold information about any reports, concerns or substantial suspicions of breaches of the Code of conduct constitutes grounds for disciplinary action.

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<sup>3</sup> The Church of Sweden requires that all partners we enter into Cooperation Agreements with have and implement a Code of conduct for staff. For complaints against a partner's staff member(s) the applicable code of conduct applies.

<sup>4</sup> This definition includes projects that the Church of Sweden finances via partners, and projects that it carries out to support the engagement of dioceses and parishes in the Church of Sweden's International work.

## 2.4 Whistleblowing (non-retaliation)

The Church of Sweden International work wants to create an environment that enables and encourages all stakeholders to lodge concerns without fear of reprisals or unfair treatment. The Church of Sweden International work will not retaliate, harass and/or cause any negative consequences to employment or entitlements for a complainant as a result of a raising a genuine concern. The Church of Sweden International work will also encourage its partners to do the same.

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

## 3. Types of complaints

### 3.1 What complaints can be made?

The Church of Sweden International work handles complaints concerning shortcomings in compliance with the commitments defined in the Church of Sweden's International work Quality and accountability framework and the Church of Sweden Codes of conduct, including:

- Implementation of projects that the Church of Sweden International work performs itself or with a partner that do not live up to applicable standards, principles and guidelines.<sup>5</sup>
- Perceived shortcomings in the Church of Sweden International work's and/or partner's handling of commitments in a Cooperation agreement, Financial commitment, membership agreement or other types of agreements.<sup>6</sup>
- Perceived lack of respect for the donor and/or the donor's wishes when handling donations.
- Suspicion of or testimony on breaches of the Church of Sweden's National level and International work Codes of conduct by staff and/or partner's staff, including corruption, fraud, sexual exploitation and abuse, and not ensuring the safeguarding of children.

### 3.2 Which complaints are not processed?

If the Complaints committee assesses that a complaint falls outside the scope of these guidelines, the complainant will be informed of this. The Church of Sweden International work does not handle the following types of complaints:

- Complaints against a project or a partner that is **not** financially supported by the Church of Sweden International work.
- Complaints about international projects or partnerships that a diocese or parish in the Church of Sweden runs itself.
- Complaints about a policy or position paper adopted by the Church of Sweden within the scope of International work.
- Complaints from the Church of Sweden International work staff or partner staff related to terms of employment and labour matters. The Church of Sweden staff shall address such complaints directly to her/his immediate superior or to the Human Resources (HR) department.
- Complaints concerning discrimination, victimisation, sexual harassment between the Church of Sweden staff and problems in the work environment. When such complaints are received by the CRM, the complaints are managed according to Swedish legislation by the HR

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<sup>5</sup> This applies to work carried out in both Sweden and internationally within the framework of International work.

<sup>6</sup> This also include our responsibility as a member of the World Council of Churches, the Lutheran World Federation and the ACT Alliance.

department via their immediate superior, HR strategist, Head of security, Head of department or HR manager.

### **3.3 Anonymous complaints**

The Church of Sweden International work recognises that at times, people with genuine concerns cannot speak out because of special circumstances and may wish to submit a complaint without revealing their identity. The Church of Sweden International work therefore also handles anonymous complaints when there is sufficient information for further action. Such complaints will be dealt with according to these guidelines due to risk of future abuse and harm. The Complaint focal points will provide a response to the anonymous complainant when possible, unless the complainant has requested that s/he does not receive a response.

### **3.4 Confidentiality**

Confidentiality<sup>7</sup> is a critical principle to satisfactory complaints handling as it protects the privacy and safety of the complainant, the subject of the complaint and other witnesses. The facts and nature of the complaint, the identities of those involved and investigation records and documentation are confidential and are only shared on a need-to-know basis. Any staff member involved in handling and/or investigating a complaint will be subject to confidentiality and will be required to sign an Oath of confidentiality. Any individuals involved in an investigation who are not staff members of the Church of Sweden International work will be requested to sign an Oath of confidentiality. Refusal of these individuals to sign the Oath, may lead to her/him not being involved in the investigation. Deviations from confidentiality and/or the Oath may result in disciplinary action, with the exception of the following:

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

The Complaints committee will not release confidential details about any complaint. Should a complaint or investigation become public at any time, the Church of Sweden's Director of International affairs may choose to issue a public statement about the procedures followed and the status and/or the outcome of the complaint that is being managed.

Information received electronically will be immediately printed out. Electronic documents will then be deleted. All paper records are kept in a folder, secured in a locked cabinet. A complaints ledger will be kept in paper form.

### **3.5 Malicious complaints**

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

If during an investigation it is found that a complaint has been made on deliberately false grounds, the investigation must stop immediately and the subject of the complaint cleared of all suspicion.

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<sup>7</sup> The Church of Sweden must comply with rules concerning transparency in the Church Ordinance, the so called Principle of Public access to information (*Kyrkoordningen kap. 53: § 3*). This does not however prevent the confidential handling of sensitive complaints when protection of individuals (*Kyrkoordningen Kap. 54: § 4*) and protection of businesses- and cooperating partners (*Kyrkoordningen Kap. 54: § 7 – 8*) needs to be taken into consideration.

Complaints made in good faith that are subsequently proved to be unfounded are not malicious and will not be treated as such.

### 3.6 Feedback and complaints

The Church of Sweden International work distinguishes between feedback and complaints. Both of these may be received via the CRM.

- Feedback is a positive or negative opinion or information by a stakeholder about the Church of Sweden International work to improve or express content with our activities and/or processes. When feedback is given, there is no intention of submitting a formal complaint. Feedback is welcomed but requires no formal response.
- A complaint is a specific grievance of anyone who has been negatively affected by the work of the Church of Sweden International work, or who considers that the Church of Sweden International work has not fulfilled one of its undertakings or commitments. A complaint necessitates a response.

## 4. How to make a complaint

### 4.1 When?

A complaint should ideally be submitted as soon a person is aware of the concern. Complaints about the shortcomings in the implementation of the Church of Sweden International work activities and procedures should be submitted when the work is on-going, or within a year after the work is finalised. For sensitive complaints, there is no time limit, as the Church of Sweden International work will investigate all sensitive complaints as far as is possible<sup>8</sup>.

### 4.2 How?

The Church of Sweden International work website provides information on how to complain. Complaints are to be addressed to the Complaints focal points at the Church of Sweden International work using the following means:

- **email:** [complaints.internationalwork@svenskakyrkan.se](mailto:complaints.internationalwork@svenskakyrkan.se) or [complaints.internationalwork@churchofsweden.org](mailto:complaints.internationalwork@churchofsweden.org);
- **letters:** Complaints focal points, International department, the Church of Sweden Central Office, SE-75170 Uppsala, Sweden;
- **telephone call/text message:** +46 703 98 62 86;
- **in person.**

Although complaints can be submitted via email, letter or telephone, text message or in person, it is preferred that they are submitted by email, with the exception of complaints from children. Complaints from a child, anyone under the age of 18, will be managed by the Church of Sweden Child Safeguarding focal point. When possible, the Child Safeguarding Focal Point will handle complaints from a child / children in person.

Those wishing to make a complaint can always contact someone they trust within the International department to submit their complaint, including Programme Officers and Staff abroad. Staff have a responsibility to assist the complainant in submitting a formal complaint when requested<sup>9</sup>.

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<sup>8</sup> The Complaints committee will decide which complaints require investigation.

<sup>9</sup> Staff can always refer complainants to one of the Complaints focal points.

Complaints should preferably be made in Swedish, English or Spanish to limit the number of people aware of a complaint (to avoid the need for translation).

If the complaint concerns a Complaints focal point(s), it should be sent directly to the Director of International affairs. If it concerns the Director of International affairs, it should be sent to the Secretary General of the Church of Sweden.

As the Church of Sweden International work is also a member of the ACT Alliance<sup>10</sup> and Core Humanitarian Standard (CHS) Alliance<sup>11</sup>, complaints regarding our work can also be submitted to these alliances.

#### **4.3 What information is required?**

Complainants should provide contact details so that the Complaints focal points can contact them for further information or to give a response. They can also state whether they consider the complaint to be of a sensitive nature and how they would like the complaint to be handled.

The sample complaints form in Annex 1 serves as a guide for the information that is required when submitting a complaint and be adapted as appropriate.

## **5. Responsibilities and mandate of the Complaints focal points and the Complaints committee**

The Church of Sweden's Complaints focal points are responsible for receiving all complaints and ensuring that complaints are managed according to these guidelines for complaints handling. The Complaints focal points prepare and present complaints to the Complaints committee. The Complaints focal points are also responsible for ensuring that cases and lessons learned are documented.

In consultation with the Complaints committee, the focal points are responsible for reporting annually to the senior management team on the CRM. The Complaints focal points are to be senior staff members and the role is formally included in the job descriptions. The Complaints focal points will also be the Child Safeguarding focal points.

Coordination of the Complaints committee will be provided by the Complaints focal points. The Complaints committee is responsible for management, advice and decisions on complaints. The Committee shall assess the nature of each complaint and makes decisions on how to proceed. The Committee may delegate non-sensitive complaints to relevant staff members, including the Programme officer, Director or Unit manager responsible for the project, partner or issue in question<sup>12</sup>. The Committee must always be informed of sensitive complaints.

The Committee is composed of:

- the Director of International affairs;
- the Complaints focal points;
- the Director of International finance;
- a senior representative from the Human resources department.

<sup>10</sup> Email: [complaintsbox@actalliance.org](mailto:complaintsbox@actalliance.org)

<sup>11</sup> Email: [complaints@chsalliance.org](mailto:complaints@chsalliance.org)

<sup>12</sup> In very simple/clear-cut cases, this decision can also be made immediately by the Complaints focal points, who forward the complaint directly to the relevant staff member and then inform the committee.

The quorum for the Committee is three persons, of whom the Director of International affairs or Deputy Director, must always be present when dealing with sensitive complaints. The Complaints committee can, when deemed necessary, co-opt a temporary committee 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 a specific expertise.

When managing complaints about staff of the Church of Sweden International work, the Complaints focal points must ensure that the relevant manager(s)<sup>13</sup> of a subject of complaint is informed if the Complaints committee decides to take any action as a result of a complaint(s). Informing the relevant manager(s) is of particular importance when a preliminary or full investigation will be conducted. If a relevant manager(s) is unavailable, the Complaints focal points will then ensure to inform the designated acting manager.

The Complaints committee and Complaints focal points are mandated to take and implement decisions related to the handling of complaints and findings of an investigation. In certain cases this decision making mandate may overrule the decision making of a staff members line management. To safeguard the best interest of the organisation in case of disagreement between the different parties, the Complaints committee, via the Director of International affairs, must be the overruling decision making stakeholder.

## 6. Procedure for handling complaints

### 6.1 Acknowledgement of receipt

Those who submit a complaint will receive an acknowledgement of receipt of the complaint within two weeks of the complaint being submitted. The confirmation must also include information on:

- when and how the complaint was received;
- the assessment that the Church of Sweden International work has made of the complaint and whether 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.

### 6.2 Determining the need for investigation

Not all complaints required a formal investigation. Some complaints can be resolved to the complainant's satisfaction through two-way communication between the complainant and the staff member receiving the complaint. The Church of Sweden International work therefore encourages our staff, partners, target groups and other stakeholders to address non-sensitive complaints informally and as close to the activity in question. Such complaints should be handled jointly with the staff concerned and addressed at operational level together with the relevant manager or supervisor. Non-sensitive complaints about shortcomings in the organisation will therefore first and foremost be given to the relevant staff member at the Church of Sweden International work, or to this person's immediate superior if the complaint concerns the relevant staff member. The Complaints focal points will provide support in handling, following up and documenting the complaint.

The committee decides if a complaint warrants an investigation. Factors that are then taken into account when deciding if an investigation is warranted includes:

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<sup>13</sup> The Head of Section must always be informed when a Unit manager is the line manager of a subject of complaint.

- if the complaint can be addressed more appropriately in another manner;
- if the complaints meets the scope of these guidelines;
- the risks for those involved.

The Committee also decides at which level the complaint shall be investigated. A preliminary investigation phase should be considered in order to analyse the appropriateness and risks of a full investigation.

The Church of Sweden International work endeavours to always investigate allegations into concerning staff members breaching of our codes of conduct, including cases of fraud, corruption, sexual exploitation and abuse, discrimination and not safeguarding children.

### **6.3 Investigation process**

When the Complaints committee assesses that a preliminary or full investigation is warranted, the Committee is responsible for appointing an investigation team, investigation manager and investigator(s). The investigation team shall have the relevant professional and technical knowledge and qualifications for conducting an administrative preliminary or full investigation.

As far as possible, investigations will be conducted in line with the ACT Alliance's Complaints Handling and Investigations Guidelines<sup>14</sup>. The Church of Sweden International work's handles all investigations with confidentiality and taking the safety of all parties to the investigation into account<sup>15</sup>. All investigations should be initiated as soon as possible, but the timeframe for the investigation and submission of the investigation report is determined based on the nature of the complaint. The complainant should be given information on how long the investigation is expected to take.

Investigations into allegations of corruption or fraud will be managed under the direction of the Director of international finance in line with applicable routines, unless delegated otherwise.

Any allegation concerning breaches of the International work's Code of conduct by a Church of Sweden International work staff member will be managed in agreement with the Church of Sweden HR 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 Swedish labour law and criminal law. Such investigations may be the subject of labour law measures and/or police investigation. The Church of Sweden International department will not conduct investigations of its own staff.

### **6.4 Outcomes of an investigation**

The investigation manager is responsible for presenting the investigation findings to the Complaints committee. The 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 representative of the Church of Sweden International work. This shall be done in person when

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<sup>14</sup> See *ACT Complaints Handling and Investigation Guidelines*, Section II.

<sup>15</sup> Any staff member involved in handling a complaint will be required to sign an Oath of confidentiality. Any individual involved in an investigation who is not staff member of the Church of Sweden International work will be requested to sign an Oath of confidentiality.



possible and one of the representatives must be on the Complaints committee or a senior manager. It is important that the necessary time is set aside for both parties to understand the rationale of the outcomes and why decisions have been taken.

The Complaints focal points will communicate the outcomes of an investigation to the complainant(s), when possible, within a reasonable time 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. Possible outcomes include the allegation(s):

- substantiated and referred to management for a decision on discipline;
- not substantiated due to insufficient or unclear evidence;
- not substantiated due to sufficient evidence to clear the subject of the complaint or to establish a malicious complaint.

## **6.5 Appeals**

An appeal regarding a complaint may subsequently be made based on applicable statutory provisions. Otherwise, the Complaints committee may receive and review a complaint if new information emerges or there are special reasons that have not been considered in previous handling of a complaint.

## **6.6 Handling complaints about partners and their staff**

Complaints relating to the work of a partner organisation or a diocese/parish will first and foremost be forwarded to partner following their complaints procedures<sup>16</sup>. The complainant must be informed of this as in some cases the person may prefer to make contact themselves. If the Church of Sweden forwards a complaint, the Complaints focal points will subsequently follow up how the complaint is handled, and that the complainant receives feedback from the partner on how the complaint is being addressed.

It is the responsibility of a partner organisation to handle and respond to a complaint made against them. However, if a partner does not have an established complaints mechanism, the Complaints committee will decide whether or not the Church of Sweden will investigate the complaint. The Church of Sweden may conduct joint investigations when a complaint is submitted to several organisations or when the Church of Sweden is knowledgeable of other partners who are donating funds to the organisation in question. Decisions to conduct joint investigations will be based on the factors mentioned in section 6.2, paying particular attention to the risks involved to all parties and the ability to maintain confidentiality. A written agreement on the process and handling of outcomes of investigations will be developed between all parties involved in conducting a joint investigation.

In cases where a complaint concerns an ACT appeal or it relates in some other way to ACT Alliance's membership rules, the Church of Sweden will consult ACT on how to handle the complaint or forward the complaint to following the ACT's Alliance Complaints policy for follow-up.

## **6.7 Referral to a third party**

In cases where the complaint contains issues that the Church of Sweden is unable to deal with, the complainant will be offered contact with a qualified third party under the applicable routines. In addition, the Church of Sweden has a responsibility to take action for those requiring support after an investigation has been conducted, when and if possible. The committee makes decisions on such matters.

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<sup>16</sup> Swedish Personal Data Act (1998:204) (Personuppgiftslagen, PUL) prohibits in certain cases the transfer of personal data to a third country.

### **6.8 Support to parties involved in a complaint**

The aim of handling complaints confidentially is to protect all parties involved, including the complainant, witnesses, the subject of the complaint, etc. The Church of Sweden International work is obliged to support individuals experiencing reprisal or unfair treatment as a result of being involved in the handling of a complaint. The Church of Sweden International work will investigate any negative consequences that the handling of the complaint may have caused for these individuals. The Church of Sweden International work will also do its utmost to attempt to resolve the problem in consultation with these individuals. The Church of Sweden International work must also be prepared to ensure that the person receives other forms of support if this is necessary in relation to the complaint. The committee makes decisions on such matters.

## **7. Disciplinary action**

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

Action regarding the Church of Sweden International work's own staff may be taken under applicable labour law.

If it emerges that a partner's staff is in breach of the relevant code of conduct, the Church of Sweden International work will enter into dialogue with the partner and follow up on how they will manage this.

## **8. Working with partners**

The Church of Sweden will continuously work with partners to inform them about our International work Code of conduct and CRM and the possibility of complaining to the Church of Sweden within the scope of these Guidelines. The Church of Sweden informs our partners that all stakeholders can complain directly to the Church of Sweden, including the target group and rights holders. The Church of Sweden will develop agreements with its partners on processes and routines for how complaints are to be handled within the partnership including acceptance of the outcomes of an investigation. It is important to discuss with partners on 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 the Church of Sweden and our partners will improve the quality of partnerships, protect both partners and the Church of Sweden staff from abuse and mismanagement and help build trust.

As noted earlier, it is the responsibility of our partners to handle and respond to the complaints made against them that is accessible and appropriate for the local context<sup>17</sup>. An accessible and appropriate CRM includes ensuring stakeholders can complain, including rights holders, target groups and children, and they are informed on expected behaviour of staff, how to complain and what can be

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<sup>17</sup> An accessible and appropriate CRM is developed through consultations with stakeholders on the design, implementation and monitoring of complaints.

complained about. Given that not all our partners have an established CRM; 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.

The Church of Sweden Quality and accountability framework provides further details on how we will work strategically on supporting our partners in developing and/or implementing their own complaints and response systems.

## **9. Follow-up and learning**

The annual complaints report compiled by the Complaints focal points will contain a summary of the number and type of complaints, along with information where relevant about how the complaint was handled and what lessons have been learned. Any confidential information, including personal data, will be excluded. After approval from the senior management team, the annual complaints report will be publically available. In connection with the report, actions will be taken to rectify any deficiencies that have been discovered. The report will be presented to all staff of the Church of Sweden International work during an information session. The Church of Sweden International work shall also document best practice in partners' methods for dealing with complaints with the aim of improving its own routines and sharing them to other partners.

## **10. Implementation and management responsibility**

The Church of Sweden's Director of International affairs, with the support of the senior management team, is responsible for the content and ensuring implementation of the Guidelines for complaints handling. The Church of Sweden's Complaints focal points are responsible for ensuring that each complaint is managed, dealt with and documented according to these Guidelines. The focal points are responsible for monitoring and updating of the Guidelines as well as internal information sharing of the content. This document and its annexes will be reviewed on an annual basis and updated as required.

These guidelines were adopted by the commission for International Commission for Mission and Diaconia on 9 February 2012. They were revised and approved by the Church of Sweden Director of International affairs, in consultation with the senior management team of Church of Sweden International work, on 15 November 2017. The revisions are based on lessons learned, consultations with stakeholders, findings of the Core Humanitarian Standards audit and in following with Swedish and European laws and regulations.

## Annex 1: Complaints letter form

Please complete (or adapt) this form and send by e-mail to: [complaints.internationalwork@churchofsweden.org](mailto:complaints.internationalwork@churchofsweden.org)  
Alternatively, mail the letter to Complaints Response Mechanism, Att: Complaints focal points: Stig Lundberg and Coleen Heemskerk, The Central Church Office, SE – 751 70 Uppsala, Sweden

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

### A: General information

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

Sex: \_\_\_\_\_ Age: \_\_\_\_\_

2. Address/email: \_\_\_\_\_ Tel: \_\_\_\_\_

### B: Description of complaint/problem

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

\_\_\_\_\_

4. Date of incident/problem: \_\_\_\_\_ Time of incident: \_\_\_\_\_

5. Place of incident: \_\_\_\_\_

6. Brief description of the incident or concern<sup>18</sup>

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

\_\_\_\_\_

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

\_\_\_\_\_

**E: Third party referral: Please state if you consider a need for referral, for example to provide some form of medical, psychosocial or legal support for the individuals involved<sup>19</sup>**

\_\_\_\_\_

**F: State what kind of response you expect from the Church of Sweden International work and how you wish the matter to be resolved.<sup>20</sup>**

\_\_\_\_\_

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

Signature: \_\_\_\_\_

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

\_\_\_\_\_

<sup>18</sup> Use extra paper if necessary.

<sup>19</sup> Decisions on this matter are made by the Complaints committee

<sup>20</sup> Complaints are handled in line with our policy and guidelines, but the wishes of the complainant are taken into account when a decision is being made on how to handle a complaint. Acknowledgement of receipt and of how it is to be dealt with will be provided within two weeks.

## Annex 2: Key definitions

A number of key terms are used throughout this document, they are defined as follows:

**Staff:** refers to but is not limited to all permanent and temporary staff, their dependents, interns, consultants, observers, volunteers, elected representatives and all individuals working for or representing the organisation.

**Dependents:** any individual accompanying a staff member abroad and living on premises which are rented or belong to the organisation.

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

**Complaint:** a specific grievance of anyone who has been negatively affected by the work of the Church of Sweden International work, or who considers that the Church of Sweden International work has not fulfilled one of its undertakings or commitments. The Church of Sweden International work will handle complaints in a fair, appropriate and prompt manner. A complaint necessitates a response.

**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 the Church of Sweden in order to improve or express content 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.

**Investigation:** a systematic process through which information is gathered that proves or disproves an allegation(s).

**Non-sensitive complaints:** shortcomings in the performance of the Church of Sweden International work's or our partners in activities and processes, for example the Church of Sweden International work not fulfilling the commitments we have made in relation to our partners, target groups, donors, etc. in agreements, principles, standards, guidelines and routines.

**Partner:** all sister churches and organisations that the Church of Sweden International work enters into Cooperation and Funding agreements with to collaborate on a mutually agreed action.

**Sensitive complaints:** allegations of fraud and corruption, sexual exploitation and abuse, and putting children at risk by a Church of Sweden International work staff or staff of a partner organisation. All sensitive complaints will be handled confidentially.

**Subject of complaint:** 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.