

General complaints and response policy

Approved by management 12 November 2010, last reviewed Dec 2021

1. Scope of policy

1.1 This policy is applicable to ICDI staff and associates (partners and beneficiaries). It covers the procedure for internal and external complaints which are not covered under the 'Child Protection Policy, and the 'Anti-fraud and Anti-corruption Policy' or other policies dealing with complaints.

1.2 Complaints against organizational policies can be made under this policy.

2. Confidentiality

2.1 Confidentiality is assumed unless you agree that your identity may be revealed.

3. Informal complaints procedure

3.1 If an ICDI staff member or volunteer has a minor complaint it can be addressed to any appropriate staff member for immediate discussion and amicable resolution. If, at the discretion of the complainant the matter is not resolved, requires investigation or more senior involvement, then the following procedures apply.

4. Formal complaints procedure

4.1 A formal complaint can be made via the 'contact us' link on www.icdi.nl, face to face, or by any other means. Complaints can be made on behalf of affected parties where necessary, but only with the affected parties' proven consent.

4.2 Complaints can be made to the most appropriate ICDI staff member such as the Programme manager, HR/Finance Manager, or Director. A formal complaint will always be put forward to the Director, who will ultimately decide on actions to be taken.

4.3 If you consider that your concern may not be taken seriously through this route, you may, alternatively go outside the management structure and raise your concern with the Board.



5. Action to be taken

5.1 All concerns raised under this policy will be dealt with promptly and will be treated seriously and sensitively.

5.2 Concerns will be discussed with the complainant in order to help determine the precise action to be taken. It will be for the Director to decide whether or not to involve other parties to investigate, or to direct the complaint to the Board or to the appropriate outside agency.

5.3 Whenever possible, resolution will be reached and the outcome known within a reasonable term. The complainant will be informed of the action taken and the outcome.

5.4 If the complainant is not satisfied with the outcome he can present an appeal for final decision to the next level of management.

5.5 If the complaint raised a legitimate concern in good faith and an investigation finds the concern to be unfounded no action will be taken against the complainant.

6. Retaliation

6.1 Retaliation is defined as any direct or indirect detrimental action recommended, threatened, or taken towards an individual who has reported a complaint under this policy.

6.2 ICDI will not accept any retaliation against person(s) who have made complaints in good faith under this policy. Anyone who victimizes a complainant for raising a legitimate concern or tries to deter someone from raising a legitimate concern will be subject to disciplinary action.

6.3 ICDI will take appropriate measures to ensure that the effects of retaliation are reversed.

6.4 ICDI will enforce mandatory discipline against staff members and volunteers where retaliation is proven to have taken place.

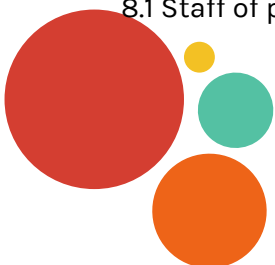
6.5 Any member of staff or volunteer who makes false and malicious accusations or who raises concerns for personal gain will lose the benefit of the confidentiality assurance and be subject to disciplinary action.

7. Leadership.

7.1 Responsibility for overseeing compliance with this policy is with the Board.

8. Complaints by partner organizations

8.1 Staff of partner organizations (including consultants) can raise a complaint in the same



way as described above and all the same conditions apply.

8.2 If a (staff member) of a partner organization chooses to follow a different path when filing a complaint, ICDI will still take the complaint seriously and will follow procedures as they are legally defined within a certain country.

8.3 Should such procedures (8.2) not exist, or cannot be implemented, ICDI will follow its own policy.

8.4 Should complaints procedures in a certain country contradict ICDI's own policy, or in other ways be deemed unfair or in contradiction with human rights principles (for example in terms of subjected punishment or in terms of hearing the other side), ICDI will not feel compelled to comply and instead will redraw from the relationship with the partner.

8.5 In the contracts between ICDI and its partners this complaints policy will be attached as annex.

9. Complaints by beneficiaries

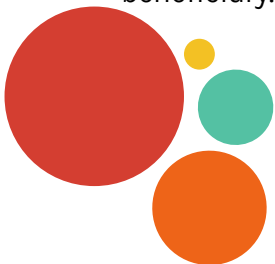
9.1 ICDI takes complaints by beneficiaries (not being partners; see 8) very serious and is at all time open to any such complaint as it may be raised.

9.2 If in a country ICDI works with a partner organization, a beneficiary can raise his/her complaint with the appropriate management structure within the partner organization (it is expected that any formal complaint by a beneficiary is always reported by the partner organization to ICDI). It is then up to the partner organization to either follow its own existing complaints procedure (which should be in line with, or at least not contradict, ICDI's complaints policy), or, should such a policy not exist, follow -as much as possible- ICDI's complaints policy as described above.

9.3 ICDI will always expect a full account from the partner organization on how a complaint by a beneficiary was handled, and will reserve the right to investigate the matter itself should this be deemed necessary (by ICDI's management).

9.4 If ICDI is not satisfied that a complaint of a beneficiary was handled in the appropriate way, ICDI will ask the partner organization for other measures. If the partner organization is unwilling to comply, ICDI will withdraw from the partnership and -where possible- will refer the matter to the appropriate authorities (but before doing so ICDI will always inform and concur with the beneficiary and make sure that he/she/they are agreeing with such actions).

9.5 ICDI usually works via partners, but in case the organization is working directly with beneficiaries, these beneficiaries will be informed on the existence of this complaints policy and will be strongly invited to pose any complaints with the appropriate management structure within the organization (after which the same policies apply as described in sections 1 to 7). ICDI commits itself to a swift and serious dealing with any formal complaint by a beneficiary.



10. Whistleblower, anonymous reporting

There is often a deeply entrenched culture of silence around exploitation, abuse and harassment. Thus it is incumbent upon all ICDI team to create reporting mechanisms that make it *easy and safe* for victims and observers to report any such misconduct.

We encourage an open-door policy, enforce a non-retaliation policy and have identified a person who is available to receive feedback and complaints (and act upon these without endangering the person(s) submitting these).

So called “whistleblowers” (which basically means anybody who wishes to raise a concern or file a complaint about ICDI’s staff conduct) can turn to Dick Vlottes, who acts voluntarily as an independent trusted person for the organization (dickvlottes@live.nl). It is important to emphasize his independency: he holds no position within ICDI and his foremost duty is to ensure that any complaint or concern is taken seriously, and that this has no personal or professional repercussions for the person reporting the matter. If deemed necessary, Dick will invoke the support of the Netherlands whistleblower agency <https://www.huisvoorklokkenluiders.nl/>.

