

 hoffnungszeichen sign of hope	<b>Hoffnungszeichen   Sign of Hope e.V.</b>  <b>Complaints &amp; Whistleblowing Policy</b>	Revision: 01.00 Valid after: 15.02.2019 Review: 15.02.2022 Page: 1 von 9
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## 1. Introduction

Hoffnungszeichen | Sign of Hope is an interdenominational human rights, relief and development organisation. Helping those in distress is the focus of our work across the world. Sign of Hope campaigns where human rights are being abused or threatened. Sign of Hope provides humanitarian aid in the form of disaster relief and emergency aid and is also involved in sustainable development cooperation based on the principle of ‘Help People to Help Themselves’.

With a background of the Christian faith as a shared set of values and basic motivating factors, Sign of Hope is guided by the core values of empathy, charity and solidarity. The following quotation from Matthew 25, verse 40 illustrates the common core: ‘Truly, I say to you, as you did it to one of the least of these my brothers, you did it to me.’

Sign of Hope is committed to put in place a Complaints Response Mechanism (CRM) to allow individuals and organisations to raise complaints on issues concerning its work and the work of its partners. It also enables Sign of Hope staff to report on incidents. Sign of Hope is also committed to support its partners to develop their own systems to handle complaints from their stakeholders efficiently, effectively and in an accountable manner.

## 2. Purpose of the Complaints Policy

The purpose of this policy is to:

- recognise, promote and protect the right of Sign of Hope’s stakeholders to raise a concern and/or complain about breaches or non-compliance with Sign of Hope’s Code of Conduct;
- empower, promote and protect Sign of Hope’s staff to report incidents and complaints
- provide information regarding Sign of Hope’s procedures for handling of complaints and guidelines for responding to and resolving complaints;
- ensure a mechanism to hold Sign of Hope’s staff and partners consistently accountable in terms of their behaviour and compliance with Sign of Hope’s standards and policies;
- ensure that Sign of Hope strives for high quality and continuous improvement in its humanitarian, development and advocacy work.

The policy is accompanied by a guideline on how complaints are handled and investigated.

## 3. Scope of Application

This policy applies to all SoH Employees and Related Personnel. Related Personnel is defined as SoH members, affiliates, board, volunteers, interns, and international and local consultants, in addition to individual and corporate contractors of these entities and related personnel. This includes non-SoH entities and their employees and individuals who have entered into partnership, sub-grant or sub-recipient agreements with SoH.

### 3.1. Definition of a complaint

**For the purpose of this policy, Sign of Hope defines a complaint as:**

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**A complaint** is an expression of discontent or dissatisfaction and/or misconduct about someone or something.

**A complaint is not** a general inquiry, an opinion, sharing/ request for information, general feedback, or a contractual dispute concerning internal staff employment conditions.

### 3.2. Types of complaints

**Minor (or operational) complaints** related to project and programme activities, procedures and implementation e.g. quality, project management, entitlements and commitments not met.

**Serious complaints and incidents** relate to a breach of the Code of Conduct and if there is an allegation or suspicion of one or more of the following:

- Concern about the behaviour of colleagues/superiors,
- Physical and psychological abuse,
- Sexual exploitation and abuse of adults or children
- Fraud and corruption
- Criminal offences

### 3.3. Complaints addressed by this policy

A complaint needs to be about an action for which Sign of Hope and/or a SoH partner organization is responsible, or which is within their sphere of control.

### 3.4. Complaints that are not addressed by this policy

The complaints listed below are not addressed by this policy. However, Sign of Hope may acknowledge and/or refer such a complaint to other concerned agencies:

- Complaints against partners, projects or activities that are not funded by Sign of Hope
- Complaints related to employment contracts and employees' terms of work. Such complaints are covered by SoH's or its partner staff rules and regulations
- Complaints that are already the subject of current investigation by a regulatory body or legal or official authority in the countries where Sign of Hope has a presence

Sign of Hope will not respond to the following complaints:

- Complaints using inappropriate or abusive language
- Complaints attempting to attack or target a person's reputation without providing evidence
- Complaints sent as part of a bulk mail from unknown source to a group including SoH
- Complaints against a political stand / view point / opinion taken by Sign of Hope or a partner organisation

### 3.5. Working through partners

The majority of Sign of Hope's projects are implemented by our partner organisations. Our partners are encouraged and will be supported by Sign of Hope to develop a system to handle and respond to complaints by their stakeholders.

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SoH will agree with partners on how rights holders can complain to SoH if, for some reason, the complainant does not want to use partner's Complaints Mechanisms. To this end, a minimum of information about SoH, including contact details, should be made available to rights holders, through our partners. This policy shall be translated into national languages and information and awareness of the policy shall be disseminated to SoH's partners.

### 3.6. Anonymous Complaints

Because of special circumstances, the complainant may have a genuine reason why they cannot speak out and wish to file their complaint without disclosing their identity. Under such special circumstances, Sign of Hope may allow anonymous complaints and will investigate anonymous complaints / incident reports as far as possible. However, Sign of Hope strongly encourages individuals to disclose their identity as this facilitates a proper and thorough investigation.

### 3.7. Malicious Complaints

Sign of Hope assumes that all complaints are made in good faith. Should an investigation reveal that the complaint is malicious or deliberately false, then the investigation will be stopped immediately and disciplinary action – including legal action - will be taken towards the complainant.

### 3.8. Confidentiality

Sign of Hope recognises the importance of confidentiality to protect the privacy and safety of the complainant. Information about the complaint and the investigation process will be available only to a limited number of authorized people. Ensuring strict confidentiality (especially when handling sensitive complaints) is ensured through Sign of Hope process of complaint handling and investigation. Any breach of confidentiality by SoH staff will lead to disciplinary action against the concerned person/s.

No disclosure of information will be made without the consent of the complainant. Sign of Hope will only allow disclosure if:

- it is required by law,
- it is required by SoH management in the best interests of the organisation and parties involved
- it is needed to obtain specialist help for a survivor of abuse or for seeking advice on the evidence.

### 3.9. Obligations to disclose & protect Whistleblowers

All Sign of Hope staff have a responsibility to report allegations or suspicions of breaches related to Sign of Hope's Code of Conduct and Policies. Proven deliberate non-disclosure will lead to disciplinary action against the staff member. The obligation to disclose is included in Sign of Hope's Code of Conduct. Whistleblowers will be provided protection against possible retaliation for their disclosure. No staff member who raises genuinely held concerns in good faith using SoH complaint mechanism will be dismissed or be subject to any disciplinary measures as a result of their action.

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## 4. Lodging a Complaint

### 4.1. Who can complain?

A complaint can be lodged by anyone: Sign of Hope staff, Sign of Hope partners, board members, project participants like beneficiaries, donors, supporters and the public.

### 4.2. When to lodge a complaint?

Complaints are accepted at any time. However, ideally a complaint should be lodged as early as possible i.e. as soon as the complainant becomes aware of a concern.

### 4.3. How to complain?

Complaints can be lodged directly by written letter/email/WhatsApp to a staff member of Sign of Hope, e.g. the responsible manager, the direct superior of the manager, a Board Member.

⇒ Contact details for lodging complaints: See Annex 1

If the complainant does not feel comfortable addressing a staff member of Sign of Hope, they should address their complaint to the independent ombudsperson of Sign of Hope

⇒ [ombudsperson@sign-of-hope.org](mailto:ombudsperson@sign-of-hope.org)

The complaint should provide basic information about who the complainant is and what they allege, i.e. what happened, who did it, when, where, who else was there and how the complainant can be contacted.

⇒ Example format for lodging complaint: see Annex 2.

## 5. Processing a Complaint

### 5.1. Formal acknowledgement of receipt of complaint

Within 96 hours of receipt of the complaint by SoH, the complainant will receive a written acknowledgement that the complaint was received. The acknowledgement letter will state when and how the complaint was received, the name of the person responsible for following up on the complaint, and who the complainant should contact regarding questions or feedback. If there is a risk for the complainant to receive an official written confirmation, it will instead be confirmed orally if possible.

The complaint will also be registered in Sign of Hope's complaint register. If the complainant has wished to remain anonymous, the same will be noted in the complaint register.

### 5.2. Determining type of complaint: minor (operational) or serious

The type of complaint will determine the next steps to be taken. Operational complaints can often be handled without a formal investigation but through desk research, action and decision making in consultation with the responsible programme management team in Konstanz (Germany), Nairobi (Kenya) or with the respective partner organisation. Serious complaints require very often a formal investigation.

### 5.3. Formation and Meeting of Complaint Handling Committee

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A serious complaint is reviewed by an ad hoc committee to handle the complaint: Complaint Handling Committee. The ad hoc formed Complaint Handling Committee will meet confidentially to discuss next steps. The Committee shall consist of the Ombudsperson (if complaint was lodged via the ombudsperson), the direct supervisor of the complainant, a member of the Board of Directors and a Head of Department. In case the allegation made is towards the direct supervisor, the member of the Board of Directors or the Head of Department, then the Ombudsperson or the person who received the complaint will ensure that this person is not part of the Committee and an alternate suitable person will be identified. Depending on the nature of the complaint, staff with expertise relevant to the case and / or external specialists may be invited to be part of the Complaint Handling Committee (e.g. lawyers, psychologists, etc.).

#### 5.4. Risk Analysis and Protection

At the initial contact with the complainant, immediate health and protection concerns regarding those involved are assessed and dealt with.

#### 5.5. Determining the need for an investigation

The complaint will be reviewed and thereafter a decision is made if an investigation is required.

#### 5.6. Investigation Process

If an investigation is called for, the Complaint Handling Committee will develop Terms of Reference (ToR) for the exercise and propose an investigation team.

The investigation process will follow the steps outlined in Sign of Hope's Complaint Handling and Investigation Guidelines.

The investigation team will not decide on actions based on the outcome of the investigation. This is done by SoH Senior Management who is guided by organisational policies.

#### 5.7. Communicating the investigation result

The result of the investigation will be communicated to the complainant as well as to the subject of the complaint as soon as possible.

#### 5.8. Appeal Process

If the complainant or the subject of the complainant are not satisfied about the result, he/she may appeal within 30 days of receipt of decision. The reason for the appeal and/or any additional evidence shall be shared. This may lead the Complaints Handling Committee to decide on a second investigation to be completed within a period of 30 days from such decision. An appeal shall be considered only once. The decisions based on findings of the second investigation shall be final and binding on the complainant and the person/s who is/are subject of the complaint.

#### 5.9. Time

The aim is to resolve complaints as soon as possible. To resolve complaints a timeline of 30 working days for operational and 60 days for serious complaints is aimed for. If a complaint cannot be resolved

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within that timeframe, the complainant will be informed about when they can expect a full response. Especially the handling and investigation of serious complaints is more complex and more time may be required.

Action	Time allotment
Complaint received	Incidents and complaints should be reported as soon as possible. However serious complaints can be brought up regardless of when the alleged incident occurred (but not later than 1 year after the incident/s occurred)
Acknowledgement of Complaints Received	Within 96 hours
Resolution on Operational Complaints	Within 30 days
Resolution of a serious complaint undergoing investigation	Within 60 days
Appeal Process	Within 30 days of decision

## 6. Learning and Review of Policy

### 6.1. Systematic Analysis & Annual Complaints Report

All steps of the complaint process shall be documented. The documentation will support the systematic analysis of cases and provide the basis for continuous improvement.

An annual complaints report will be written and submitted to the board of SoH for information and comment. The aim is to get recommendations for improved way of working as well as to ensure effective and efficient handling of future complaints

### 6.2. Regular Review of Policy

The mechanisms set out in this Complaints Policy shall be formally reviewed every three years via an online survey as well consultations with various stakeholders. The results will inform revisions to the policy and guidelines.

## 7. Associated Policies

This policy is complementary to the sets of standards of behavior that all SoH employees are required to adhere to as stipulated in the SoH Code of Conduct as well as in the anti-fraud and anti-corruption policy. These policies go hand in hand with the policy on protection from sexual exploitation and abuse and child protection.

### Sources:

Ammerschuber / Schenk (2017): Complaint Mechanism for Non-Governmental Organizations. A Practitioner's Guide, [https://brotfueralle.ch/content/uploads/2017/04/Complaint-Mechanisms\\_final.pdf](https://brotfueralle.ch/content/uploads/2017/04/Complaint-Mechanisms_final.pdf) (accessed 15 August 2018)

ACT ALLIANCE (2016): Complaints Policy, <https://actalliance.org/wp-content/uploads/2017/01/ACT-Complaints-Policy-Oct-2016-E.pdf> (accessed 15 August 2018)

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The Lutheran World Federation (2015). Policy & Procedure Complaints Mechanism, [https://www.lutheranworld.org/sites/default/files/lwf\\_complaints\\_mechanism\\_june\\_2015.pdf](https://www.lutheranworld.org/sites/default/files/lwf_complaints_mechanism_june_2015.pdf) (accessed 15 August 2018)

***We acknowledge and are grateful for the work done by other organisations (listed above) in developing their Complaint Response Policies and Mechanisms that guided the development of our policy.***

## Annexes

### Annex 1

The following possibilities to lodge a complaint are available:

Way to lodge complaint	To Sign of Hope directly	Via the Ombudsperson
Verbally	Direct Supervisor (if not possible, then to the next higher level e.g. superior of your supervisor, Head of International Programmes, Board or to the Internal Controller) or Known Person of contact at Sign of Hope	
By Mail	Email to: Direct Supervisor or Known Person of Contact at Sign of Hope or Director of East Africa Branch: Lucia Sorrentino <a href="mailto:sorrentino@sign-of-hope.org">sorrentino@sign-of-hope.org</a>  Head of International Assistance and Cooperation: Marcel Kipping <a href="mailto:kippling@sign-of-hope.org">kippling@sign-of-hope.org</a>  Board: Chairman: Reimund Reubelt	<a href="mailto:ombudsperson@sign-of-hope.org">ombudsperson@sign-of-hope.org</a>

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Way to lodge complaint	To Sign of Hope directly	Via the Ombudsperson
	<p><a href="mailto:reubelt@sign-of-hope.org">reubelt@sign-of-hope.org</a> Vice Chairman: Klaus Stieglitz <a href="mailto:stieglitz@sign-of-hope.org">stieglitz@sign-of-hope.org</a></p>	
By Letter	<p>Hoffnungszeichen e.V.   Sign of Hope c/o respective person (see above) Schneckenburgerstr. 11d 78467 Konstanz Germany</p>	<p>Hoffnungszeichen e.V.   Sign of Hope c/o Ombudsperson Schneckenburgerstr. 11d 78467 Konstanz Germany</p>
By Phone	+ 49 7531 9450170	

## Annex 2: Suggested Complaint Letter / Mail Format

### 1. General Data

- Name of person or organisation lodging complaint
- Gender
- Age
- Address
- Phone
- E-mail
  
- Name of person you wish to lodge a complaint against
- Date of Incident
- Time of Incident
- Place of Incident

### 2. Brief Description of the incident or concern

### 3. Name of Witness(es) (if any and if relevant)

*Provide name(s) of witness(es) and how they can be contacted if known*

### 4. Describe Action taken after the Incident

*If this is a complaint related to sexual exploitation and abuse, please provide detailed information regarding what medical assistance has been provided, what psychosocial care has been provided and whether a report has been made to the Police.*

### 5. State what kind of response you expect from Sign of Hope

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**Name**

**Date**

**Signature**

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