

ABColumbia complaints policy

1. POLICY STATEMENT

In fulfilling its vision, objectives and goals ABColumbia upholds high standards of professional and personal conduct.

This includes respecting people's intrinsic dignity and developing relationships of mutual respect regardless of race, gender, religion, sexual orientation, age, ability or beliefs. As well as being good stewards of the resources entrusted to us, including environmental resources, and to be transparent in, and accountable for, our work.

Our Code of Behaviour makes explicit commitments that the conduct of anyone who carries out work for, or represents, ABColumbia, is, and is seen to be, of the highest standards.

If at any time this standard is not upheld, we want to be informed. We welcome the information as a way to try and put things right and improve our quality and effectiveness. ABColumbia is committed to ensuring the accessibility of our Complaints Policy, procedures and systems.

2. LEGAL COMPLIANCE

There are no specific legislative requirements, however ABColumbia is guided in terms of complaints handling and reporting by best practice set out by our member organisations and through them the Charities Commissioners, the Core Humanitarian Standard and the Code of Fundraising Practice.

3. RISK STATEMENT

Due to the nature of our operations, there is a low risk that ABColumbia representatives will be the subject of some complaints from communities and CSOs we serve, interns or the general public. The impact on the organisation of any serious complaint is high, due to the potential for reputational damage and possible financial implications.

4. POLICY DEFINITIONS

Our Representatives, for the purposes of this policy, include employed staff, interns, Board Members and ABColumbia member representatives and any other person who is authorised to carry out work for, or represent, ABColumbia

Complaint is an expression of dissatisfaction that needs further investigation and a considered response. It is the need for investigation and response that makes a complaint distinct from other types of feedback and can cause some types of feedback, for example a concern, to become a complaint.

Grievance is also an expression of dissatisfaction that needs further investigation and a considered response. A grievance is distinct from a complaint in that it usually describes complaints made by employed staff about an issue internal to ABColumbia.

Table 1 lists example scenarios individuals can complain about. Table 2 lists scenarios that would not be considered as a complaint. These lists are not exhaustive.

Table 1: Example scenarios people can complaint about

- Exploitation of people and communities, staff or our representatives in any form.
- Unwanted, inappropriate or disrespectful sexual advances or harassment.
- Bullying, perceived threats, intimidation, favouritism, or belittlement
- Hostility to individuals due to race, religion, nationality, gender, sexual orientation, disability, or other characteristic protected by law.
- Corrupt or biased decisions to include or exclude people and communities.
- Abuse of power or position in the delivery of programmes and projects
- Inappropriate disclosure of confidential information
- Improper fundraising practices
- Fraud, theft, bribes, any corrupt practices.
- Situations that threaten the safety, security or well-being of individuals
- Situations that endanger health, safety or the environment.
- Falsification of expense reports.
- Bias, rigging, collusion or other unfair practices in procurement procedures
- Fraudulent registration of People and Communities.
- Inadequate supplier due diligence
- Actual or perceived “conflicts of interest” in ABCOLOMBIA or partner decision making.
- Fraudulent selection of partners.
- Theft or diversion of aid or resources
- Lax or inadequate monitoring of ABCOLOMBIA or partner performance or effectiveness.
- Any other actions that may harm individuals or discredit ABCOLOMBIA’s reputation
- Internal grievance about pay, hours of work, holiday, organisational change, equity and workplace relationships

Table 2: A complaint is not:

- A general query about ABColumbia’s work or requests for information
- Information shared with us about matters unrelated to ABCOLOMBIA
- Related to contractual disputes
- A request to amend records, for example, to correct an address, cancel a donation or unsubscribe from ABCOLOMBIA ‘service’ such as a campaign newsletter or email.

5. POLICY SCOPE:

This policy applies to those working or interning for or on behalf of ABCOLOMBIA and to member and partner organisations, supporters, people and communities and any other individual or organisation who wishes to make a complaint about ABCOLOMBIA's activities or our representatives, or the activities or representatives of an organisation with whom ABCOLOMBIA works.

This policy only covers complaints. ABCOLOMBIA considers other types of feedback as important and has processes to receive and respond. But this policy focuses on guidance for managing expressions of **dissatisfaction** that require further investigation and a considered response.

POLICY COMMITMENTS

In welcoming and addressing complaints, ABCOLOMBIA commits to:

Accountability

- Welcome and accept all complaints, take them seriously and, and manage them in a timely, fair and appropriate manner.
- Ensure our complaints handling process is documented and in place and covers complaints about the delivery of our work, sexual exploitation and abuse, and other abuses of power.
- Communicate how our mechanism can be accessed and the scope of issues it can address.
- Resolve complaints as far as possible, seeking to provide restitution for any loss or damage that cannot be replaced or repaired.
- Report complaints to the relevant regulatory bodies and donors as required.
- Refer any complaints that do not fall within the scope of our organisation to a relevant party in a manner consistent with good practice. For example, any complaints that indicate a possible criminal offence has been committed, must be referred to the statutory authorities responsible for investigating such matters, when it is safe to do so.

Transparency & Accessibility

- Ensure the people and communities we work with are provided with appropriate information about our organisation, the principles we adhere to, how we expect our representatives to behave, the programmes being implemented and what they intend to deliver.
- Ensure the people and communities we work with are aware of the expected behaviour of our representatives, including organisational commitments made on the prevention of sexual exploitation and abuse.
- Ensure communication is in languages, formats and media that are easily understood, respectful and culturally appropriate for different members of the community, especially vulnerable and marginalised groups.
- Ensure policies for information sharing are in place and promote a culture of open communication.
- Consult with the partners, people and communities we work with on the design, implementation and monitoring of complaints handling processes.

Confidentiality & Safety

- Manage complaints in a manner that prioritises the safety of the complainant and those affected at all stages.
- Ensure information related to the complaint is only shared on a need-to-know basis among those directly handling or overseeing the complaint. As a general rule, names or personal

details of alleged survivors, perpetrators, complainants or others involved will not be shared. If it is necessary to disclose information to 3rd parties this is decided on a case-by-case basis and, as far as possible, with the agreement of the person who has raised the complaint, except in cases of criminal activity.

Quality & Learning

- Review and adapt or revise practices in light of analysis of complaints received and ongoing conversations with stakeholders.
- Pay particular attention to inclusivity by considering the gender, age and diversity of those raising complaints.
- Use analysis of anonymised complaints information as part of continuous improvement processes.

6. APPLYING ABCOLOMBIA POLICY COMMITMENTS

ABCOLOMBIA have few international programmes or projects where we work directly with people and communities. Our work is focused on advocacy at the international and national levels and research in the field. When visiting the field, we do this almost always together with an ABColumbia member organisation or with their local partner CSOs. Therefore, complaints from people and communities about ABColumbia representatives and their activities may well be submitted to our member organisations and/or their partner organisations directly and managed through their organisational processes. In these cases, we would expect that they contact ABColumbia and that the complaint is dealt with jointly between ABColumbia and the agency that received it.

- partners/members will advise ABCOLOMBIA of all serious complaints related to ABCOLOMBIA, our representatives, (this includes but is not limited to allegations of serious misconduct e.g. fraud, corruption, theft, sexual exploitation and abuse of children or adults, and other abuses of power)
- that complaints that do not fall within the scope of the partner/member organisation are referred to a relevant authority or organisation as appropriate.

Nevertheless, ABCOLOMBIA's name, logo and contact information must be made available to people and communities, so they can complain directly to ABCOLOMBIA if they prefer. In locations where communicating with ABCOLOMBIA directly via telephone or internet is not appropriate, we will work with members and their partners, and communities to find an appropriate solution. ABCOLOMBIA seek to ensure partners, members and communities are satisfied with the complaints mechanisms that are in place and consider adaptations as necessary.

7. HOW TO RAISE A COMPLAINT WITH ABCOLOMBIA

How to make a complaint is clearly indicated on our website. Complaints can be made via email or phone. All complaints and safeguarding concerns will be managed confidentially and sensitively.

- Email: Board@abcolombia.org.uk (this email direction will go to the ABColumbia Chair of the Board, HR Board Member and PAM)
- Programme and Advocacy Manager (PAM): lwinstanley@abcolombia.org.uk
- Phone direct line to PAM +44 (0) 2078702216

Making a complaint on behalf of another person: Individuals can make a complaint on behalf of another person, if they have been asked to do so for reasons such as a fear of repercussions, safety concerns or language barriers.

Anonymous complaints. It is helpful if names and contact details are provided by complainants as this allows those responding to be in contact if additional information is needed, and to keep individuals updated where appropriate. It can also help us ensure that individuals do not experience any negative consequences for raising a complaint in good faith. However, we recognise there may be some circumstances where individuals have good reasons for anonymity (for example fear of retaliation). If a complaint is raised anonymously it is especially important that detailed information is provided as it may not be possible to pursue cases that lack enough information. It may not be possible to provide updates for anonymous complaints.

Timescale for making a complaint: Complaints should be made no later than 6 months from the date the individual became aware of the last incident. However, we recognise that the circumstances of some complaints might make it difficult for individuals to come forward and therefore ABCOLOMBIA will investigate all sensitive cases.

8. OUTLINE PROCEDURE

We manage complaints (or internal grievance) in accordance with the relevant internal policies and procedures. Complaints are assessed and triaged to the relevant case handler depending on the category of complaint (e.g. safeguarding, fraud and loss, grievance). All procedures commit us to:

- Acknowledge complaints within a set timeframe
- Provide the complainant with a contact point within the organisation and an outline of next steps
- Investigate all complaints in a manner appropriate to the content of the complaint, avoiding unnecessary delays.
- Keep the complainant updated of progress and resolution, unless:
 - the situation means we must respect the privacy of individuals who may be affected
 - the complainant has expressly indicated a preference not to receive a response
 - the complaint has been made anonymously and this is not possible

Referral: We will report any complaints involving criminal activity to the relevant authorities responsible for further investigation, when safe to do so.

Onward Reporting: We report statistics and individual serious complaints to our member organisations.

9. APPEALING A COMPLAINT DECISION

Individuals who have raised a complaint and who are unsatisfied with the response from ABCOLOMBIA' staff members have the right to appeal this to the Chair of the Board or HR Board representative.

Chair of the Board is Gaby Drinkwater email: Board@abcolombia.org.uk

Address: ABCOLOMBIA, Romero House, 55 Westminster Bridge Road, London, SE1 7JB.

10. POLICY DISSEMINATION

This policy will be disseminated to all ABCOLOMBIA staff. The policy will be included in the new starter induction. It will be circulated to all ABColumbia members in a more tailored format and, will be accessible, alongside other relevant policies and guidelines in a file that is available to all staff in the office. An accessible version of this policy is available on ABCOLOMBIA's public website.

11. COMPLIANCE WITH POLICY

The Board is responsible for monitoring compliance. If lack of compliance with this policy in terms of handling or resolving complaints is identified by any individual, please report it immediately to the Chair of the Board. If any individual feels unsure about whether a complaint should be made, please contact any member of the Board or staff team. If any ABCOLOMBIA staff member has any concern regarding the activities or representatives of ABCOLOMBIA or our partners, this can also be reported through the ABCOLOMBIA Whistleblowing Policy.

12. ABCOLOMBIA BOARD RESPONSIBILITIES

ABColumbia Board are ultimately responsible for reviewing and approving this policy. They must ensure that ABCOLOMBIA complies with best practice in collecting, handling and reporting on complaints and take all reasonable steps to ensure that there is appropriate transparency and accountability.