

# LPI's Complaints Policy, Reporting and Response Mechanism

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# LPI Complaints Policy,<sup>1</sup> Reporting and Response Mechanism

## Introduction

LPI emphasises quality and accountability in its peacebuilding and policy engagement and strives to promote accountability to partners, stakeholders and beneficiaries and aim to assist in collaboration with partner organisations. While LPI encourages in-person feedback and communications, there may be situations when stakeholders would prefer to provide feedback in a confidential venue. Through this Complaints Mechanism, LPI provides a way for stakeholders to raise formal complaints and receive a response through a safe, accessible and effective process.

## Definitions

*Complaint* – a formal expression of dissatisfaction or discontent about something. Requires a response.

*Complaints Mechanism* – a formalised mechanism that provides a safe, accessible and effective channel for individuals to raise complaints and for a response or redress to be given.

*Non-confidential complaints* – complaints that are considered as non-sensitive, i.e. complaints not connected to abuse of power or corruption.

*Confidential complaints* – complaints considered sensitive – for example complaints related to abuse of power or corruption.

## Guiding principles of effective complaints handling

Visibility	LPI’s Complaints Mechanism is available on the its website and also internally.
Accessibility	LPI’s Complaints Mechanism is readily accessible to all partners, employees and communities. The policy is easy to understand and includes details on making and resolving complaints.
Responsiveness	Receipt of each complaint is immediately acknowledged to the complainant. Complaints will be handled in an efficient and effective manner. Complainants will be treated courteously and kept informed of the progress of their complaint throughout the complaint-handling process.
Objectivity	Each complaint is addressed in an equitable, objective and unbiased manner through the complaints-handling process.
Confidentiality	Personally identifiable information concerning the complainant is actively protected from disclosure, unless the complainant expressly consents to its disclosure.

<sup>1</sup> This also serves as LPI’s whistle blowing policy

People focused approach	All partners and employees of LPI, including the members of the board, the Executive Director and the Senior Management Team, are committed to efficient and fair resolution of complaints. LPI actively solicits feedback from its partners and communities on a regular basis and acknowledge a client’s right to complain.
Accountability	All partners and employees accept responsibility for effective complaints handling. The Complaints Officer will ensure that, where appropriate, issues raised in the complaints handling process are reflected in partner and employee performance evaluation
Continual improvement	LPI’s complaints handling process will be reviewed periodically, and at least annually, to aim to enhance its efficient delivery of effective outcomes.

**Right to complain**

LPI’s Complaints Mechanism gives stakeholders the right to complain if LPI has not fulfilled its commitments and failed to live up to its promises, or if there have been situations of corruption and/or misuse of power and authority. LPI takes its commitments seriously and therefore takes all opinions and grievances seriously. All complaints are valuable for LPI in order to learn and improve and avoid future mistakes.

As LPI’s stakeholder you also have the right to have your complaint answered through LPI’s response mechanism. In order for a complaint to be considered as valid it must, however, refer to formal commitments or promises that LPI has done to you as a stakeholder; see below. In order for you as a stakeholder to have an understanding of these formal commitments, LPI is publishing this policy document and related documents on its website and will also spread them directly to its partner organisations.

LPI’s implementing partners are also expected to assure that basic information about LPI’s Complaints Mechanism is presented in a language and a format and media which is relevant and accessible and can be understood by the staff of the organisation, and in extension right holders within the communities where LPI works.

**Who can complain**

Complaints from the following categories of stakeholders will be addressed through LPI’s Complaints Mechanism:

- LPI staff, employees, contractors, consultants and interns
- LPI’s implementing partners and their employees
- Institutional donors and other donor organisations of LPI
- Communities where LPI and its implementing partners work

## Parameters for complaints

- Commitments on contracts and agreements with local partners
- Commitments on contracts and agreements with donors
- To ensure that staff and partners respect the Code of Conduct of LPI
- LPI's Anticorruption Policy and Conflict of Interest Policy

LPI takes a serious view on all kinds of abuse of power by LPI staff, including persons who are employed by an LPI partner organisation. It is therefore possible to forward complaints to LPI in cases of abuse of power, such as corruption or other forms of abuse of power by staff employed by a local partner.

According to contracts between LPI and local implementing partners, local partners agree to work actively to prevent, counteract and uncover any form of illegal or inappropriate handling or other form of misuse of funds. According to project agreements signed for each project, the local partner undertakes to notify LPI immediately and investigate and, if necessary, take legal action against the party/parties suspected, for good reason, of theft, fraud, corruption or other illegal inappropriate handling or other form of misuse of funds. This applies to all forms of abuse of power or position to gain own benefits, including sexual harassment or abuse. At any suspicion that illegal or improper handling of funds or other forms of abuse of power, LPI also initiates an investigation. If suspicions are confirmed, LPI and other financiers have the right to cancel their support and terminate the existing agreement and the local partner may be obliged to repay the funding

The following examples are issues that LPI is *not* able to handle as valid complaints:

- Opinions on the work of LPI that are *not* related to contracts, project agreements or LPI's Code of Conduct.
- Opinions on whether the implementing partner is working according to the project plan (for example is penalising any category of people). Such complaints should be addressed directly to the implementing partner organisation, which is expected to handle such complaints within their own project management system and should provide a response to the complainant.
- Opinions regarding an approved project's goal, time plan, criteria for selection of beneficiaries/rightholders etc. Such questions will be answered by the local project leader.

## Confidentiality and non-retaliation

LPI will take every measure to ensure confidentiality and non-retaliation to avoid any negative consequences for anyone filing a complaint through LPI's Complaints Mechanism.

All complaints where the complainant has requested confidentiality will be treated with confidentiality. Furthermore, if LPI believes that it would pose a risk to a complainant if a complaint became known, it will be treated it as confidential even if this is not requested. This may be the case when a complaint includes serious allegations regarding:

- fraud and corruption
- sexual abuse
- serious mismanagement
- any issue where an investigation could lead to disciplinary action or criminal prosecution

Every effort will be made to keep the complainant's identity confidential. There may, however, be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose your identity (for example corruption and sexual abuse). This may occur in connection with associated disciplinary or legal investigations or proceedings. If in LPI's view such circumstances exist, efforts will be made to inform you that your identity is likely to be disclosed. If it is necessary for you to participate in an investigation or legal process, the fact that you made the original disclosure will, as far as is reasonably practicable, be kept confidential and all reasonable steps will be taken to protect you from any victimisation or detriment as a result of having made a disclosure.

In order not to jeopardise any investigation into the alleged malpractice, the complainant will also be expected to keep the fact that s/he has raised a concern, the nature of the concern and the identity of those involved confidential.

## LPI's Complaints Mechanism

### a. How a complaint may be made

When a complaint is about a particular engagement, programme, partner or employee and you are familiar with the engagement team working on your matter, you may wish to address your complaint to an appropriate member of that engagement team, orally, by letter, or e-mail. For each country program, the LPI Resident Representative is the most appropriate person to make this report.

When possible, complaints should be made in writing so that the details of the complaint are clear and complete. If you are not sure to whom to refer your complaint, or feel it is inappropriate to address your complaint to a member of the engagement team, you may refer to the general LPI complaints mechanism either by filling in the on-line complaint form ([link](#)) or sending an e-mail to [complaints@life-peace.org](mailto:complaints@life-peace.org)

### b. Information required when making a complaint

When making a complaint, please provide the following information:

- your name, position and contact details
- your relationship with LPI (i.e. the nature of your engagement with LPI)
- your contact person within LPI
- the nature of the complaint (including when the conduct giving rise to the complaint occurred)
- details of the LPI partner or employee involved (if applicable)
- copies of any documentation supporting the complaint

### c. Acknowledgement of complaints

We are committed to acknowledging all complaints immediately upon receipt. Once a complaint has been received, we will undertake an initial review of it.

We will endeavour to resolve complaints within four weeks after receiving the complaint, but this will not be possible on all occasions. When our review exceeds four weeks, we will contact you to inform you of the reasons for the delay, and indicate to you when we expect to be in a position to complete our review of the complaint.

### d. Response to a complaint

All complainants can choose the way to receive the response, whether by letter, e-mail, or telephone. The normal procedure will be to deliver the response as the complaint was received. The answer to a complaint will be given no later than a month after it was received at LPI's office in Uppsala. However, sensitive and confidential complaints may take longer to respond to, and in such cases the complainant will be informed about the time frame for the response.

### LPI's internal complaints handling procedure:

In order to ensure an appropriate and timely response to your complaint, the following procedures will be followed, depending upon whether the complaint is considered confidential or not:

<b>Non confidential</b>	<b>Confidential</b>
Your complaint is received by the Complaints Coordinator who registers it in the LPI database and gives it a reference number. Only the Complaints Coordinator, the Executive Director and the internal investigator (if appointed) have access to the database.	Your complaint is received by the Complaints Coordinator who registers it in the LPI database and gives it a reference number. Only the Complaints Coordinator, the Executive Director and the internal investigator (if appointed) have access to the database.
You will receive confirmation that LPI has received your complaint.	You will receive confirmation that LPI has received your complaint.
<p>Even if the complaint is not classified as confidential, LPI may classify it as such, based on LPI's Confidentiality and Non-Retaliation Policy (below).</p> <p>If related to an LPI Programme, the Complaints Coordinator will forward the complaint to LPI's Programme Director, who will decide on the response and take decisions regarding any necessary actions.</p> <p>If related to an LPI staff member, the Complaints Coordinator will forward the complaint to LPI's Admin and Finance Director, who will decide on the response and take decisions regarding any necessary disciplinary actions.</p> <p>After the investigation is completed, the response will be formulated by the Complaints Coordinator.</p>	<p>The Complaints Coordinator will forward the complaint to LPI's complaints board.</p> <p>If the complaint is related to fraud and corruption LPI will make an investigation according to <i>LPI's Anti-Corruption Policy</i>. After the investigation is completed, the response is formulated by LPI's investigation team. The Complaints Board will decide on the response and will also take decision on disciplinary actions.</p> <p>Investigations regarding sexual abuse or sexual exploitation will be handled by the Executive Director and the Director of Finance and Administration. Investigations regarding such serious allegations will be made according to the investigation manual <i>Building Safer Organisation Guidelines – Receiving and investigating allegations of abuse and exploitations by humanitarian workers</i>, see <a href="http://www.hapinternational.org/pool/files/bsoguidelines.pdf">http://www.hapinternational.org/pool/files/bsoguidelines.pdf</a></p>
You will receive a written response on your complaint through the means you have identified.	You will receive a written response on your complaint through the means you have identified.

### Appeals

If you think that LPI's response on your complaint is not appropriate, you can appeal the decision through the same entry points used for filing the complaint. Appeals can also be sent directly to the LPI's Complaints Coordinator ([complaints@life-peace.org](mailto:complaints@life-peace.org)). Attach an explanation on why

you find that the response was not appropriate and indicate the reference number of the original complaint.

Appeals are handled by a team of key people in the Senior Management team of LPI, which functions as a complaints board.

### **Partners**

As a part of LPI's accountability commitments we also encourage and support our partners to develop and use systems of their own for complaints handling within their organisations. This also includes project specific systems for handling complaints, which are developed in dialogue with the right holder of the individual projects.

LPI's implementing partner organisations are expected, as a minimum standard, to inform their stakeholders of the name and contact information of the project managers and key leaders within their organisations, in order to make it possible for stakeholders to address complaints as well as to give feedback to the implementing partner organisation. If the implementing partner has a formal complaints system in place, it is expected that this system is used for the operations that LPI supports.

### **Quality management**

LPI's Complaints Mechanism helps LPI to live up to its quality commitments and promises to the stakeholders. The lessons learnt from the complaints that LPI receives is an important part of the development of its quality management system, including internal control system.

### **Referrals**

If a complaint is of a kind that LPI is not capable or authorised to handle, it may be referred to an external body, such as the local authorities (e.g. county authorities, Stockholm), the LPI Board of Directors, or LPI's parent institution, the Christian Council of Sweden. We will ensure that this is done in a manner consistent with our Confidentiality and Non-Retaliation Policy.

**LPI welcomes feedback from implementing partners and stakeholder regarding its Complaints Mechanism, described in this policy document. If you have any questions, comments or suggestions regarding LPI's Complaints Policy, Reporting & Response Mechanism, please contact [info@life-peace.org](mailto:info@life-peace.org)**

**Flowchart for handling of complaints**

