

# COMPLAINTS REPORTING AND HANDLING PROCEDURE

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## 1. Background and aims

The Dynamo International complaints reporting and handling procedure aims to provide a safe and accessible mechanism to enable anyone, from within or outside the organisation, to confidentially report violations of integrity. The procedure guarantees that each complaint is handled confidentially, appropriately, fairly and swiftly, and offers assurance that the victims and complainants are protected at all stages of the process, including against any form of retaliation.

The procedure falls within the wider scope of Dynamo International's integrity policy, which itself is based on compliance with the Code of Ethics, Youth Work Code of Ethics, and Child Protection Policy to which all collaborators of the organisation - namely employees, volunteers, Board members, members, partners, and consultants associated with the organisation, or any person representing the organisation - commit.

## 2. Scope

### *2.1. Which types of integrity violations can be reported?*

This procedure applies to the reporting of complaints regarding violations of integrity linked to Dynamo International's work, projects and collaborators, whether they occur in a professional setting, when delivering services or running projects, in external partnerships benefiting from Dynamo International funding, or in any other situation relating to the organisation's work or reputation, including outside the formal work setting.

A violation of integrity refers to any incident, act or behaviour that contravenes the ethical, legal and organisational principles and values laid down in Dynamo International's integrity policy and Code of Ethics, and which causes or could cause physical, psychological, moral or financial harm to a person or organisation. Violations of integrity can include, but are not limited to:

- Acts of discrimination;
- Harassment, intimidation, the use of physical or psychological violence;
- Sexual abuse, sexual exploitation, or sexual intimidation<sup>1</sup>;
- Conflicts of interest, fraud and corruption;
- Non-compliance with laws and national and international standards applicable to the organisation's work.

### *2.2. Who can report an issue or make a complaint?*

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<sup>1</sup> According to Article 1 of the Royal Decree of 28 February 2023 establishing the existing integrity charter for development cooperation as a national benchmark for the integrity policy and setting up a central contact point for victims of abuse in the development cooperation sector.

Anyone who becomes aware of a potential violation of integrity may report the issue or make a complaint, whether they are a victim, a witness or a third party.

Complaints submitted by legal entities or de facto associations are accepted, provided that they are made by the duly authorised people.

- *Anonymous complaints*

Complaints can be submitted anonymously, including through a non-identifiable email address created for the occasion by a complainant who wishes to remain anonymous. Every effort will be made to follow up the complaint, subject to sufficient information being provided to enable an in-depth investigation.

### *2.3. Alignment with existing frameworks*

This complaints reporting and handling procedure is designed to complement the existing mechanisms provided by the internal regulations, such as line management reporting, contacting the prevention advisor, or the external prevention service provided by the organization's work rules<sup>2</sup>. It offers an alternative and specialised channel, without however replacing the legal and regulatory mechanisms, which remain fully accessible to the concerned parties. If there is overlap with external or regulatory mechanisms, complainants are informed of their right to initiate parallel proceedings or opt for the procedure most suited to their circumstances.

Anyone with a question, or who is uncertain about the nature of a situation, and is wondering whether to report an issue, may contact Dynamo International's **Integrity Advisor**, Claudine Verstraeten, by telephone on +32(0)478662440, email at [integrity@dynamointernational.org](mailto:integrity@dynamointernational.org), or using the [online form](#) on [www.dynamointernational.org](http://www.dynamointernational.org).

Any enquiry submitted in this context will be handled in complete confidentiality.

## 3. Guiding Principles

- Data Protection and Confidentiality

Any information provided when reporting an issue or during an investigation will be handled with the utmost confidentiality. The information will be accessible only to those directly involved in handling the complaint, and only to the extent necessary to successfully conduct the investigation. The complainant's identity is safeguarded and cannot be disclosed to third parties without their express consent, except in the specific circumstances under which disclosure is required by law or by a competent legal authority. In such cases, the complainant will be notified in advance. All data relating to complaints and investigations will be stored in secure systems in compliance with the GDPR (General Data Protection Regulation).

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<sup>2</sup> The Prevention Advisor is responsible for matters related to well-being and workplace safety. The external service for workplace prevention and protection can be contacted by staff members for psychosocial support, particularly in cases of moral or sexual harassment at work. At Dynamo International, this service is provided by Attentia (see contact details in section 5.1).

- Protection against Retaliation

Dynamo International undertakes to protect anyone who has made a complaint in good faith against any form of retaliation. This protection applies to victims, witnesses, complainants, and those taking part in investigations or providing relevant information relating to complaints. Any direct or indirect attempt to retaliate, including but not limited to unwarranted disciplinary action, threats, harassment or being disadvantaged at work, is regarded as a serious offence and will be sanctioned accordingly.

- Fair Treatment

The procedure is based on unconditional respect for the rights and dignity of all parties involved, be they complainants, victims, witnesses or those accused. Each report or complaint is handled impartially, without bias or favouritism, based on objective facts. Dynamo International is committed to guaranteeing a fair process, in which all parties are heard equally, and to maintaining a just and transparent approach throughout the complaint handling process. All parties involved are informed of their rights, including the right to defence and the presumption of innocence for the accused.

## 4. Roles and Responsibilities

### 4.1. Integrity Officer

The integrity officer is tasked with applying Dynamo International's integrity policy. S/he ensures that a culture of integrity is fostered and maintained within the organisation and more widely with all stakeholders. The integrity officer's main tasks are as follows:

- Draft and update the integrity policy;
- Plan staff training and awareness raising activities about the integrity policy;
- Ensure that the complaints reporting and handling mechanism exists, is accessible and works properly;
- Regularly identify and assess integrity-related risks and suggest appropriate risk management measures;
- Ensure transparency (annual integrity report) and continuous improvement (assess the reporting mechanism and monitor policy application).

The officer can be a member of the staff or Board of Directors. The role is currently held by Marie Vincent, senior project manager ([m.vincent@dynamointernational.org](mailto:m.vincent@dynamointernational.org)).

### 4.2. Integrity Advisor

The integrity advisor can be contacted by anyone in all confidence in order to obtain integrity-related advice. The integrity advisor responds to requests for clarification about Dynamo International's integrity policy and helps people who are considering submitting a complaint by advising them about all aspects of the process. The Integrity Advisor is bound by strict confidentiality and plays a vital role in preventing breaches of the Code of Ethics by helping all stakeholders to better understand their rights and duties, the various informal and formal channels available, and potential integrity-related risks. The advisor offers an accessible, trustworthy and non-judgemental support.

The integrity advisor is responsible for the [integrity@dynamointernational.org](mailto:integrity@dynamointernational.org) email address, connected to the online form dedicated to inquiries. Claudine Verstraeten, a member of the Board of Directors, currently holds the role of integrity advisor.

### 4.3. Complaints Manager

The Complaints Manager guarantees that all integrity-related complaints are thoroughly dealt with in accordance with the applicable principles and procedures. S/he is the person who receives complaints and coordinates the investigative process. The Manager is tasked with:

- Receiving and managing complaints via the various reporting channels;
- Undertaking an initial examination of whether the complaint is admissible;
- Dealing with complainants and providing support to the individuals involved;
- Acting as liaison between the Complaints Management Committee and the parties involved;
- Coordinating the investigation process;
- Drafting reports on cases and keeping the complaints register up to date;
- Suggesting to the Integrity Officer possible improvements to internal integrity systems based on cases handled and analysis undertaken.

The Complaints Manager is responsible for the [plaintes@dynamointernational.org](mailto:plaintes@dynamointernational.org) email inbox, linked to the online complaints form. The role is currently shared by Chantal Pissort and Pierre Delhez, members of the Board of Directors, who work together to ensure timely processing of complaints. When making a complaint, the complainant can state whether s/he has a preference as to which person handles their complaint.

### 4.4. Complaints Management Committee

The Committee has a minimum of four members: the Complaints Manager, the Director, a Board member, and a member of the Kern.<sup>3</sup> Two substitute members are appointed and sit on the Committee if a member is unavailable, notably in the event of a conflict of interest. According to the issue being handled and the expertise required, other people may be invited to sit on the complaints Committee based on their skills and their ability to impartially deal with the case in question.

The Committee meets once the Complaints Manager has undertaken a preliminary assessment, when there is justification for taking steps in response to an accusation. In this case, the Complaints Management Committee is responsible for the whole response to the incident. In particular, the committee must:

- Review and supplement the risk assessment ;
- Undertake a legal assessment to determine whether the complaint should be referred to the competent authorities;
- Decide whether an investigation should be opened ;
- Record and document all the decisions in the appropriate system;
- Review the final investigation report, if applicable, and confirm its receipt in writing ;
- Determine whether further measures, such as disciplinary proceedings, should be taken, making use of legal advice if necessary.

## 5. Reporting

### 5.1. Informal notification

Informal notification is possible without an official complaint being submitted. Anyone with concerns may at any time discuss their suspicions in complete confidentiality with the Integrity Advisor

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<sup>3</sup> The Kern is the organisation's consultation forum bringing together management (1), the admin/finance unit (1), the quality unit (1), the operational divisions (2), and potentially one or more members of the Board of Directors, depending on the issue.

(Claudine Verstraeten, Tel. +32.(0)478.66.24.40 / [integrity@dynamointernational.org](mailto:integrity@dynamointernational.org)), who is familiar with all procedures and will be able to direct the notifier to the appropriate person.

Dynamo International staff members also have the option of contacting their line manager, the Prevention Advisor (Marianne Le Marchand, [m.lemarchand@dynamointernational.org](mailto:m.lemarchand@dynamointernational.org)) or the external workplace wellbeing service (Attentia : [wellbeing@attentia.be](mailto:wellbeing@attentia.be)/ Tel: +32.(0)2.738.75.31).

## 5.2. Lodging a complaint

Any formal complaints must be made in writing in either one of the two national languages (French or Dutch) or one of Dynamo International's three working languages (French, English or Spanish) via one of the following channels:

- **E-mail** to the dedicated confidential address: [plaintes@dynamointernational.org](mailto:plaintes@dynamointernational.org)
- **Secure online form available** on the Dynamo International website (<https://dynamointernational.org/en/about-dynamo-international/integrity/>)

## 5.3. Receiving and recording the complaint

The Complaints Manager acknowledges receipt of any complaints from known senders within a **maximum of three working days**. Confirmation of receipt is sent in the language of the complaint if it is in one of the two national languages or one of Dynamo International's three working languages) and specifies that the complaint will be handled promptly.

The Complaints Manager assigns a number to the file and records it in the secure complaints register. The file covers each of the complaint handling phases from the date of receipt until the file is closed. It will be completed as the procedure progresses.

# 6. Preliminary Assessment

## 6.1. Admissibility

The Complaints Manager scrutinises the complaint to check whether it meets the admissibility criteria, and tries to obtain additional information if necessary.

A complaint is regarded as admissible if it meets the following criteria:

- It involves a potential violation of integrity as per Section 2.1 above;
- It relates to an incident or a person for which Dynamo International has jurisdiction;
- It is submitted in **good faith**, i.e., with the genuine intention of reporting an inappropriate act or behaviour, and not with malicious intent ;
- It relates to incidents that took place within five years prior to the complaint submission date;
- It is as factual as possible and provides sufficient information to enable adequate assessment of the soundness, nature, scope and urgency of the case (facts, context, parties involved, location, date, etc).
- It is not essentially the same complaint that has already been processed or is currently being handled unless new information significantly impacts the nature, severity, and/or handling of the complaint.

## 6.2. Decision on admissibility

The Complaints Manager informs the complainant of the decision to accept or reject the complaint within a reasonable timeframe after receipt of the complaint.

If the complaint is admissible, the Complaints Manager informs the complainant about the procedure and obtains their consent to start the procedure. The Complaints Manager will keep the complainant regularly informed about the progress of the complaint throughout the process.

If the complaint is inadmissible, the complainant is informed of the grounds for the refusal. The Complaints Manager informs the complainant if another channel holds responsibility for dealing with the complaint. The complainant is free to lodge a new complaint that brings to light new information.

## 6.3. Initial risk assessment

The Complaints Manager undertakes an initial risk assessment to determine the severity and urgency of the complaint. Potentially high-risk situations requiring immediate action include:

- Threats of violence or physical harm;
- Any reported act of sexual exploitation, sexual abuse, or sexual harassment;
- Threats about potential disruptions of interventions;
- Significant reputational risk;
- A warning about the possibility of a risk occurring within the next 24-48 hours;
- Danger of data being destroyed.

When such risks are reported, the Complaints Manager immediately notifies the Complaints Management Committee, based on the “need-to-know” principle.

If the complaint is deemed urgent, the Complaints Manager refers to Dynamo International’s crisis communications procedure to adapt the investigation and monitoring process to the circumstances.

## 6.4. Support and protection measures

Based on the nature of the identified risks, the Complaints Management Committee, mobilised by the Complaints Manager, identifies any immediate protection and support measures to ensure the safety of vulnerable parties (victims, complainants and witnesses) and protect them against any form of retaliation.

In the event of a complaint of sexual exploitation, sexual abuse or sexual intimidation, in accordance with the Royal Decree of 28 February 2023, protection measures must aim to immediately stop the abuse and prevent the alleged perpetrator from having access to the potential victim and/or the notifier. Temporary protective measures may include the temporary suspension of the accused or ensuring the safety of vulnerable parties.

Support measures systematically involve offering and facilitating access to medical and psychosocial assistance for vulnerable parties, provided they wish to receive such support.

## 7. Investigation

### 7.1. Preliminary investigation

When a complaint is deemed admissible and requires further investigation, the Complaint Manager convenes the Complaint Management Committee. The composition of this Committee is flexible and may include, in addition to the four permanent members, additional members with the necessary expertise to address the specifics of the case, depending on the type of complaint, the individuals involved, and the country concerned. Committee members are selected based on their expertise and impartiality in handling the case. Each member signs a confidentiality agreement and, after reviewing the details of the complaint, declares any potential conflicts of interest.

If a committee is formed, its first meeting takes place within a maximum of seven days after the complaint is received for non-urgent complaints. For urgent complaints, the meeting must occur within three days. The Complaints Manager is responsible for convening and chairing meetings, and ensuring that meeting minutes are produced. These minutes and any documentation relating to the case are securely stored by the Complaints Manager in a folder only accessible to Committee members.

The Complaints Management Committee conducts investigations to assess the credibility of the alleged facts and whether evidence can be gathered. It collects all relevant information and conducts interviews with the parties involved. Written or physical evidence provided is analysed and documented.

At the conclusion of these investigations, the Committee reviews and completes the risk assessment and defines mitigation measures. The committee also undertakes a legal assessment to decide whether the complaint should be referred to the relevant authorities and seeks legal advice if necessary. Finally, the committee decides whether an in-depth investigation should be opened.

If no in-depth investigation should be conducted, the process moves to the case closure phase.

### 7.2. In-depth investigation

If a decision is taken to conduct an in-depth investigation, the Complaints Management Committee determines, based on the facts and details of the investigation, who will be involved and whether the investigation should be carried out internally or externally. If the investigation is outsourced, the Complaints Manager is responsible for drafting the investigation's terms of reference, setting the aims, methods, resources needed and a precise timeline. The investigation must be completed within 60 days of the complaint's receipt.

The individual or team tasked with the investigation signs the Code of Ethics, Dynamo International's Child Protection Policy, and the confidentiality and absence of conflicts of interest document. Throughout the investigative process, discretion and confidentiality are maintained to the greatest extent possible, and information is shared with individuals strictly on a "need-to-know" basis.

Each investigation requires an individual approach. The handling of specific facts and data takes into account the specific circumstances. All the investigative work and the measures taken are documented in an investigation report comprising general information, documents received, and the conclusions. The investigation report also contains information about the investigator(s) and the parties contacted and involved, anonymously or identified.

At the conclusion of the in-depth investigation, the investigation report is sent to the Complaints Manager, who stores all the investigation information in the dedicated secure folder. The investigation report also contains information about the investigator(s) and the parties contacted and involved.

### 7.3. Final report

The Complaints Manager drafts a final report specifying the basis of the complaint, the facts, evidence, analysis, the investigation's findings, and recommendations for disciplinary or corrective action. The final report is shared with the Complaints Management Committee for scrutiny and approval.

The report is an official and confidential document that may only be accessed by members of the Complaints Committee. However, the Committee may, by a unanimous and justified decision, authorize consultation by a specific individual.

The Complaints Manager and the Complaints Management Committee will ensure the anonymity of all those involved (complainant, victim and accused) for any person external to the complaint handling process.

## 8. Follow-up

### 8.1. Feedback to the complainant

The complainant and the person/people concerned by the complaint will be informed about the findings of the investigation within a maximum of three months after receipt of the complaint.

If the complaint concerns abuse as defined by the Royal Decree of 28 February 2023, the complainant is informed that if they believe the investigation was not conducted thoroughly or correctly, or that necessary measures were not taken in the case of verified facts, they may contact the central point of contact established by the Federal Public Service for Foreign Affairs, whose details will be provided.

### 8.2. Follow-up measures and potential sanctions

Decisions and actions to be taken following the investigation process are determined by the Complaint Management Committee, based on the conclusions and recommendations of the investigation report. The committee decides whether additional measures, including disciplinary actions, are required, relying on legal advice when necessary.

Follow-up measures, including disciplinary actions, are implemented by the relevant responsible parties in compliance with legal obligations.

### 8.3. Internal follow-up and annual report

Under the coordination of the Integrity Officer, Dynamo International ensures follow-up to guarantee the implementation of corrective measures and to evaluate their long-term effectiveness.

The Complaint Manager produces an anonymized annual report detailing complaints received, investigations conducted, and corrective measures implemented. This report is presented to the Board of Directors and shared with stakeholders during internal meetings. This follow-up ensures transparency and enables lessons to be learned to improve internal practices. Based on this report, the Integrity Officer prepares a communication on integrity to be included in the organization's activity report, presented at the General Assembly, and published on the organization's website.

### 8.4. Continuous improvement

Dynamo International is committed to regularly review this procedure, taking into consideration feedback and best practice from sector NGOs. Adjustments will be made to guarantee that the procedure remains compliant with national and international standards for integrity, complaint management, and the protection of victims and whistleblowers.



