



IDI COMPLAINTS FRAMEWORK 2018

IDI- Supporting SAIs in Strengthening Performance & Capacities

CONTENTS

Introduction	1
Guiding Rules and Regulations for Internal Complaints.....	2
Complaint Process.....	2
Internal Complaint.....	2
External Complaint.....	6
Annex 1	8
Tips for Individuals Seeking to Resolve a Complaint Informally:	8
Tips for Managers/Safety Representative/HR Manager Seeking to Resolve Complaints Informally:.....	8
Annex 2: Written Statement of Complaint.....	9
Annex 3: Verifying and Following up a Complaint	10
Annex 4: Conducting a Complaint Meeting.....	10
Annex 5: Conducting an Appeal Meeting	11
Annex 6: Written Statement for External Complaint	12

INTRODUCTION

The IDI strives to be an organization that is professional at all levels, leads by example in the SAI community in terms of transparency and ethics, and maintains trust and confidence of its partners. Implicit in this is the need for all IDI staff and IDI Board members to conduct their work with the highest levels of ethics and integrity. Any observed breaches of professional and ethical behavior by IDI staff, management or the Board members should be reported to the IDI as outlined in this framework in the section for external complaints.

The IDI also aims to be a good place to work for all staff, to be an employer that encourages diversity and the expression of views, where there is room for constructive criticism and diverging opinions, and where all staff feel that they are treated in a fair and respectful manner. At the same time, there may be instances where a member of staff feels it necessary to raise issues of concern informally, or lodge an official complaint. The procedures for dealing with complaints from IDI staff are outlined in the section on internal complaints.

The aim of this complaint framework is to provide the structure for handling both internal and external complaints within the IDI. In order to ensure effective complaint management, the framework is governed by the principles of effectiveness, objectivity and fairness.

All complaints shall be followed up by the IDI in a timely, equitable, objective, unbiased and transparent manner.

GUIDING RULES AND REGULATIONS FOR INTERNAL COMPLAINTS

IDI staff members observing any behaviour in breach of Norwegian law or internal IDI rules and regulations, at any point of time, is expected to alert the fellow employee in breach. If the breach is of a serious character one is obligated alert to alert either IDI management, the IDI safety representative, the IDI human resource manager or the Chair of the IDI Board. The Norwegian Working Environmental Act states in §2-4, 2-5 and 3-6 “*that the working environment of an organization will be organized in such a manner that staff can report on any areas of concern*”. The IDI Code of Ethics also states that all IDI staff “*have a responsibility to report any instances of breach of laws, regulations, IDI policies or suspicions of wasteful use of IDI resources or corrupt practices (5.5.d.)*” as well as any “*observed or suspected instances of sexual exploitation, harassment or abuse (5.6.e.)*”.

Examples of issues which might give rise to a complaint include:

- Bullying
- Harassment
- Relationships at work
- Working environment
- Discrimination
- Terms and conditions of employment
- Health and safety
- Theft
- Corrupt practices

The IDI complaints framework is applicable to all IDI staff, as well as members of the IDI Board and others conducting work on behalf of the IDI.

COMPLAINT PROCESS

INTERNAL COMPLAINT

There are two levels of reporting a complaint internally in the IDI, *informal* and *formal* complaints. The decision on whether to put forward an informal or formal complaint depends on the seriousness of the issue and is a decision that rests with the complainant.

All complaints shall be handled with respect and fairness. Any complaint forwarded that prove to be intentionally false complaints will be treated with disciplinary action.

All disclosures will be treated confidentially and sensitively. The name of the person making the complaint will be kept confidential if so desired by the complainant.

While staff are encouraged to put their name on any concern raised, there may be sound reasons for making the complaint anonymously and the wish to remain anonymous shall be respected. All complaints made, whether anonymous or not shall be substantiated and followed up. In doing so the IDI shall ensure that the rights and welfare of both the person making the complaint, and the person complained against shall be ensured.

LEVEL 1: INFORMAL COMPLAINT

Informal complaints in the IDI are complaints that typically are considered “less serious” and where the complainant believes the issue can be successfully resolved in an informal manner through verbal and/or written dialogue with colleagues and/or their manager. Informal complaints can be made in writing or orally. For it to be classified as an informal complaint it does however need to be raised officially with a view to following it up with the concerned parties.

If the complaint concerns one’s line manager, the employee may approach the next level of management to try to resolve the situation. If one does not feel comfortable in approaching any levels of management one may alternatively approach the IDI safety representative, or HR manager. If the complaint is against the Director General one may contact a member of the IDI management team or Chair of the IDI Board.

Once an informal complaint has been raised, the person (e.g. the employee’s manager) handling the complaint will process the complaint as soon as possible and latest within 15 working days. The manager will meet the employee and give him/her the opportunity to explain the complaint and suggest how one would want to see it resolved. The person complained against will also be called for a meeting with the view of resolving the issue.

If an informal complaint does not lead to a satisfactory result the employee may escalate it to a formal complaint.

Step	Action	Output	Timeline
1	Dialogue with colleagues/ manager/ next level manager /HR Manager/Safety Representative		Immediate
2	Responsible manager calls a meeting	Minutes are recorded that an informal complaint has been made and a meeting has been held.	Within 15 working days
3a	Informal complaint resolved	The written record is updated with informal complaint having been resolved and relevant details recorded	

		regarding how it was solved.	
3b	If unresolved, the complaint should be escalated to a formal complaint		

See *annex 1* for guidance on how to handle informal complaints.

LEVEL 2: FORMAL COMPLAINT

A formal complaint shall always be made in writing, (*see annex 2*). It can be submitted via email or printed copy and should be submitted as soon as possible. The complaint should be sent to the employee’s line manager with a copy to the HR manager. If the line manager is part of the complaint, the employee may submit the complaint to the next level of management.

The complaint should include, the employee’s name, the nature of the complaint, any informal actions already taken (if applicable) and it may also include the desired actions and outcome the employee would like to see as a satisfactory solution. The employee may include any other relevant information or comments, *see annex 2*. In case one would like to report something anonymously, one may use the form as it is in annex 2 but leave the name section blank. Anonymous complaints shall still be sent in writing. The complaint will be followed up according to the relevant steps, however, it will for obvious reason not be possible to call a meeting with the complainant.

The IDI will also accommodate employees who would like to report the complaint with name, but remain anonymous for the processing of the complaint (i.e. complainants name will not be revealed to the person complained against).

The manager who handles the case shall start processing the complaint as soon as possible and latest within 15 working days. He/she will, together with the HR manager, call a meeting with the complainant where the complaint is reviewed.

The person who has been complained on, will be given a chance to respond to the complaint. A meeting will be called to inform about the nature of the complaint as soon as possible. In addition, the person complained upon, will be given the opportunity to provide a written response, latest 25 working days after being informed.

Based on the meetings with involved staff and managers, the manager who is handling the complaint will decide on possible actions to be taken including deadlines. This will be done in cooperation with the Director General and the HR manager. Both the complainant and the staff/manager who has been complained on will be informed about the decisions (*annex 4*).

If any of the parties feel that the complaint was not handled fairly and appropriately, he/she may appeal to the next level of management or the Director General.

The appeal must be made within reasonable time after the actions have been taken. A decision will be made whether to accept or reject the appeal. If any further actions are to be taken these will be outlined, (see *annex 5*).

The Director General shall be informed of all formal complaints within the IDI.

Any formal complaint against the Director General or a member of the IDI Board shall be raised with the Chair of the IDI Board.

Any complaints against the Chair of the Board shall be handled by a committee of three Board members. This committee shall be established by the Deputy Chair of the Board. The complaint may be raised with the Director General or a member of the IDI Board.

The IDI shall take all necessary steps to look after the staff member making the complaint also after the complaint has been resolved. Both the complainant and the person who has received a complaint will be offered counselling services through IDI’s employment health service both during the process and after the case has been processed.

Step	Action	Output	Timeline (cumulative)
1	Complaint is sent in writing to the complainant’s immediate line manager (or next level of management) with a copy to HR Manager.	Written complaint (annex 2)	As soon as possible
2	Complaint processed by manager and a meeting called with the complainant and HR manager. The Director General will be informed.	Minutes from meeting written by HR manager	15 working days
3	The person who has been complained against will be called to a meeting and be informed of the complaint. The person will have a chance to respond at the meeting as well as in writing.	Minutes from meeting written by HR manager	As soon as possible and maximum 10 days
4	Meeting with other employees/managers involved (if/where relevant)	Minutes from meeting(s) written by HR manager	10 working days
5	Meeting with all parties involved (or separate if anonymous complaint) to go through the complaint, the process, solution and possible further actions, annex 4	Summary of complaint, process, solution and any agreed further actions to be taken	10 working days
6a	FORMAL COMPLAINT SOLVED		

6b	If the formal complaint is not solved satisfactorily one may appeal to the next level of management /DG	Written complaint/appeal	Within reasonable time after potential actions are taken
7	Appeal on handling of formal complaint		Within 20 working days

EXTERNAL COMPLAINT

All official complaints communicated by external parties regarding IDI or IDI employees shall be escalated to the Director General for appropriate action.

In case of unprofessional or unethical behavior by any IDI staff member, the IDI would urge that the issue is reported to the IDI. Any external complaints related to IDI staff should be addressed in writing to the Director General for follow up and appropriate action. If the complaint refers to the Director General or members of the IDI Board they should be directed to the Chair of the IDI Board.

All external complaints shall be handled within fifteen working days and completed within thirty days.

The complainant will be contacted by the IDI to discuss the complaint and follow up.

The person complained against will be called to a meeting with the Director General or Chair of the Board accompanied by the HR manager to discuss the complaint. He/ She may also provide written feedback on the complaint. A written summary of the meeting will be recorded. If appropriate the external complainant will receive feedback regarding the actions taken and the solution arrived at concerning the complaint.

Step	Action	Output	Timeline
1	Complaint is sent in writing to the Director General/Chair of the IDI Board	Written complaint (annex 6)	As soon as possible
2	Complaint processed by Director General/Chair of the IDI Board. The complainant will be contacted by the IDI to discuss the complaint and follow up	Minutes from meetings written by HR Manager	15 working days
3	The person who has been complained on will be called to a meeting and be informed of the complaint. The person will have chance to respond in the meeting as well as in writing.	Minutes from meeting written by HR manager	As soon as possible and maximum 10 days
4	Meeting with other employees/managers involved (if/where relevant)	Minutes from meeting written by HR manager	10 working days

5	Meeting or other communication with complainant, manager and HR manager to go through the complaint, the process, solution and possible further actions	Summary of complaint, process, solution and any agreed further actions to be taken	10 working days
6	Feedback to complainant (if/where applicable)	Written reply (if applicable)	5 working days
7	EXTERNAL COMPLAINT SOLVED		

ANNEX 1

TIPS FOR INDIVIDUALS SEEKING TO RESOLVE A COMPLAINT INFORMALLY:

- Prepare your thoughts ahead of any informal discussion of your complaint.
- Give an objective description of the situation, stick to the factual information first.
- Clarify what exactly is your complaint, what gave rise to it, and what impact it has had, or may have, on you.
- Clarify how you think the complaint should be resolved and what, in your view, would need to happen to bring it to a satisfactory resolution.
- Be constructive and positive and treat matters confidentially.
- Be honest and objective in your account of the complaint with the relevant manager or colleague.
- Be proactive in seeking a one to one meeting with the relevant colleague to seek to resolve the complaint.
- If the complaint was resolved informally then put the issue behind you.
- Be open to what the other person has to say about the case and reflect upon it before considering whether to raise a complaint through the formal procedure.

TIPS FOR MANAGERS/SAFETY REPRESENTATIVE/HR MANAGER SEEKING TO RESOLVE COMPLAINTS INFORMALLY:

- Consider the feelings of staff and address proactively any complaints or issues as quickly as possible before they have a damaging effect on morale or performance and before they become potential formal complaints.
- Take complaints and problems seriously and act quickly even if it was not put in writing or raised formally. Be open to what the individual has to say and don't pre-judge the issue or reject a complaint because you don't agree with it or because it may not sound plausible.
- Make sure you establish what the problem is and what the person bringing the complaint wants to see happen in order to resolve it. Ask open questions (talk me through...tell me about...what would need to happen.) to get him/her to explain fully the complaint.
- If the complaint is based on dissatisfaction with a management decision, try to explain why the decision was made, including information on the factors taken into account and the options that were considered.
- If the complaint was based on dissatisfaction with a policy or its application, you may wish to ask the relevant colleague responsible for the policy to explain and discuss the policy and to respond informally to the complaint.
- Where the complaint was caused by issues relating to working relationships it may be helpful to seek a resolution by mediating between the relevant parties either in a single meeting or separate meetings depending upon the nature of the case. This can help bring about a shared understanding of the complaint and how it can be resolved.
- Be constructive, open and objective in your communication and treat matters confidentially.
- Make and retain a brief written record of the complaint and how it was handled.
- When a complaint was resolved informally, put the issue behind you.

ANNEX 2: WRITTEN STATEMENT OF COMPLAINT

<p>Your Name:</p> <p>Name of the manager handling your complaint:</p>
<p>Part 1: Your complaint. Please give details of the nature of your complaint. Provide specific details (e.g. dates, times, witnesses or people who may be able to provide relevant evidence) and attach relevant supporting evidence if necessary.</p>
<p>Part 2: Informal action. State briefly what, if anything, you have done to resolve the matter informally, and explain why this has not resolved it to your satisfaction. Alternatively, state why informal resolution had not been tried or was not appropriate in this case.</p>
<p>Part 3: Outcome you are seeking. Please state what specific action or actions would, in your view, be needed to resolve your complaint satisfactorily. What outcome are you seeking?</p>
<p>Part 4: any other comments?</p>
<p>Part 5: declaration. I confirm that to the best of my knowledge the information I have given is true and accurate</p> <p>Signed: _____ Date: _____</p>

Once completed, this form should be sent to the relevant manager to handle the complaint. It must also be copied - for information - to the HR Manager.

ANNEX 3: VERIFYING AND FOLLOWING UP A COMPLAINT

The responsible manager will:

- Complete the follow up as quickly as possible, and as far as possible within the expected timescales.
- Treat the matter sensitively and confidentially.
- Be objective, open minded and impartial throughout the follow up as also with regards to the evidence being gathered.
- Seek the facts of the case from the complainant, the person complained about and any other relevant people. This may be in the form of a written statement or interview.
- Inform all interviewees ahead of any meeting that they could arrange to be accompanied by a colleague.
- For all interviews, begin the discussion with an explanation of the purpose of the follow up and request that the interviewee keep the matter confidential. Explain that your notes of the interview will be included in the case papers which would go to all the parties involved in the complaint but that the interviewee would have the opportunity to comment on and agree with the notes of their interview first.
- Take notes of interviews and agree these with the interviewee.
- Ensure that all parties have a reasonable opportunity to comment on the issues.
- Produce a brief report on your follow up including a summary of your main findings, with the evidence from your investigation annexed to the report. It should not include a decision whether to uphold or reject the complaint at this stage - this will be determined following the complaint meeting.
- Copy the report and any supporting evidence to the individual who raised the complaint as well as the individual(s) who were the subject of the complaint ahead of the complaint meeting. The complainant and any individual who is the subject of the complaint should be given the opportunity to respond in writing ahead of the meeting

ANNEX 4: CONDUCTING A COMPLAINT MEETING

PRIOR TO THE MEETING:

- Arrange for relevant staff as well as the employee's representative to attend the meeting and to receive a copy of the report on the investigation and the employee's written response (if any).
- Prepare for the meeting and ensure that you have all the necessary facts and evidence.
- Arrange for someone to take notes from the meeting. These notes are potentially subject to disclosure.
- If the individual or the person accompanying him/her has any special needs (e.g. relating to a disability) ensure that these have been considered and, where appropriate, accommodated.

AT THE MEETING:

- Explain the purpose of the meeting (to consider carefully the complaint and decide whether to uphold or reject it).
- Check that those present have received the relevant papers.
- Outline the process to be followed at the meeting.
- Ask the complainant whether he/she had any comments or questions.
- Invite any other relevant party in attendance (e.g. the individual against whom the complaint had been raised) to respond to the complaint report, and ask or invite any questions.
- Summarize your findings from your investigation.
- Be open to any further discussion of the case.
- Summarize the facts of the case and any other relevant points but remember you would have the option of adjourning the meeting (e.g. to consider your decision or conduct further investigation should it be necessary).
- You should decide whether to uphold or reject the complaint based on your considered view of the evidence. Complaints can sometimes involve one person's word against another - so remember that your decision would be based on what you think the evidence shows is the **balance of probability**.
- Explain your decision and the reasons for the decision.
- Clarify whether any further action should be taken, and where appropriate the target dates for completion.
- Explain that the individual would have the right to appeal against the decision and outline the process for making an appeal.

AFTER THE MEETING:

- Confirm your decision in writing and set out your reasons for your decision. Set out any actions that will be taken following the meeting and where appropriate the target dates for completing these actions. This letter should note that the individual has a right to appeal. It should indicate the timescale for making an appeal and provide details of who would handle an appeal should one be made. The letter should be copied to other relevant parties for information.
- If necessary, consult Human Resources regarding any further action that should be taken
- Send the case file (including: the complaint; the report on the investigation and any supporting papers; a note of any action that will be taken or has been taken; written confirmation of the decision regarding the complaint and a note of the complaint meeting) to Human Resources who will retain the file centrally.

ANNEX 5: CONDUCTING AN APPEAL MEETING

PRIOR TO THE MEETING:

- Arrange for the appellant and his/her representative (and any other relevant staff) to attend the meeting
- Prepare for the meeting and ensure you have all the necessary facts and evidence. You would need to consult with the manager who handled the complaint (and possibly others) about the points raised in the appeal
- Arrange for someone to take notes from the meeting. These notes are potentially subject to disclosure.

- If the individual or the person accompanying him/her had any special needs (e.g. relating to a disability) ensure that these are considered and, where appropriate, accommodated.

AT THE MEETING:

- Explain the purpose of the meeting (to consider the appeal and decide whether to accept it or reject it).
- Check that those present have received the relevant papers.
- Outline the process to be followed at the meeting.
- Invite the individual to state the reasons for the appeal.
- Respond to the points raised in the appeal.
- Be open to any further discussion of the case.
- Summarize the evidence relating to the appeal (remember you would have the option of adjourning the meeting to consider your decision or complete further investigation work if necessary).
- You should decide whether to uphold or reject the appeal based on your considered view of the evidence.
- Explain your decision and the reasons for your decision and that it would be confirmed in writing.
- Outline any actions that will be taken as a result of the complaint and, where appropriate, the target dates for completion.
- Explain that this is the final stage in the internal complaint procedure.

AFTER THE MEETING:

- Confirm your decision to uphold or reject the appeal in writing along with your reasons for the decision and any actions that will be taken with target dates where appropriate. The letter should also note that this was the final stage of the formal complaint procedure. The letter should be sent to the individual who raised the appeal and copied to other relevant parties including the manager who handled the grievance and to Human Resources.
- If necessary, consult HR regarding any further action that should be taken
- Give the complete case file (including all papers relating to the complaint and the appeal) to HR.

ANNEX 6: WRITTEN STATEMENT FOR EXTERNAL COMPLAINT

Your Name (optional):

Name of IDI employee your complain concerns:

Part 1: Your complaint. Please give details of the nature of your complaint. Provide specific details (e.g. dates, times, witnesses or people who may be able to provide relevant evidence) and attach relevant supporting evidence if necessary.

Part 2: Informal action. State briefly what, if anything, you have done to resolve the matter informally, and explain why this has not resolved it to your satisfaction. Alternatively, state why informal resolution had not been tried or was not appropriate in this case.

Part 3: Outcome you are seeking. Please state what specific action or actions would, in your view, be needed to resolve your complaint satisfactorily. What outcome are you seeking?

Part 4: any other comments?

Part 5: declaration. I confirm that to the best of my knowledge the information I have given is true and accurate

Signed:

Date:

Once completed, this form should be sent to the Director General or Chair of the IDI Board
