



ACTED



**GRIEVANCE
POLICY**

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I. INTRODUCTION

Independent, private and non-profit, ACTED respects a strict political and religious impartiality, and operates following principles of neutrality, non-discrimination, transparency, according to its core values: responsibility, impact, enterprising-spirit and inspiration.

ACTED is committed to immediate humanitarian relief to support those in urgent need and protect people's dignity, while co-creating longer term opportunities for sustainable growth and fulfilling people's potential. ACTED endeavours to respond to humanitarian crises and build resilience; promote inclusive and sustainable growth; co-construct effective governance and support the building of civil society worldwide by investing in people and their potential.

The commitment of ACTED is guided by 4 core values:

- **Responsibility:** we ensure the efficient and responsible delivery of humanitarian aid with the means and the resources that have been entrusted to us.
- **Impact:** we are committed to having the most sustainable impact for the communities and the people with whom we engage.
- **Enterprising-spirit:** we are enterprising and engage in our work with a spirit that creates value and overcomes challenges.
- **Inspiration:** we strive to inspire all those around us through our vision, values, approaches, choices, practice, actions and advocacy.

Policy Statement

ACTED adopts a zero tolerance approach towards inappropriate misbehaviour and is committed to respecting the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, ACTED's Grievance Policy:

- Encourages prevention;
- Promotes detection;
- Sets out a clear investigation procedure;
- Sets out a mechanism of sanctions.

The purpose of the policy is aimed at guiding ACTED staff and must be considered together with:

- ACTED's Code of Conduct;
- ACTED's Child Protection Policy;
- ACTED's Conflict of Interest Prevention Policy;
- ACTED's Data Protection Policy;
- ACTED's Anti-fraud, Bribery and Corruption Policy;
- ACTED's Policy Against Sexual Exploitation and Abuse;
- ACTED's Anti-Terrorism Policy;
- ACTED's procedures, manuals and handbooks e.g. Finance, Logistics, Administration & Human Resources, Transparency & Audit, Security & Safety and AME, in connection with the grievances prevention, detection and reporting.

II. INTERPRETATION AND APPLICATION

Article 1 – Scope of Application

This policy applies to all ACTED staff and governance members.



Article 2 – Definitions

1. **Grievance:** Under the terms of this policy, the term “grievance” means a serious dissatisfaction or complaint raised by staff (including interns) which may relate to (i) their employment conditions, (ii) their professional situation, (iii) their professional relations, (iv) their working environment or (v) any action that ACTED has taken or intends to take with regard to the staff.
2. **ACTED Staff:** Under the terms of this policy, “ACTED staff” refers to any person employed by ACTED and/or one of its sister organisations and/or one of the member organisations of the ACTED network. The interns of ACTED and/or one of its sister organisations and/or one of the member organisations of the ACTED network are considered to fall within this category, for the purposes of this policy.
3. **Governance:** Under the terms of this policy, the term “governance” refers to any person elected by decision making bodies to participate in the managerial and administrative bodies of ACTED and/or one of its sister organisations and/or one of the member organisations of the ACTED network. In particular, the members of boards of directors and supervisory boards are Governance members.

Article 3 – Information and adherence to the policy

1. This policy is published under the authority of ACTED. ACTED staff and governance members are required to conduct themselves in accordance with this policy and must therefore be aware of and have understood its provisions and of any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.
2. ACTED staff and governance members who are responsible to negotiate the terms of conditions of employment of any ACTED staff, must ensure that staff is aware of and commits to the full respect of this policy.
3. It is the responsibility of ACTED staff and governance members with managerial responsibilities and to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary measures as sanction against any violations of its provisions.
4. This policy shall form part of the working conditions of ACTED staff and governance members from the moment they certify that they have read it.
5. ACTED will review the provisions of this policy at regular intervals.

Article 4 – Purpose of the Policy

1. The purpose of this policy is to specify the rules which relate to grievances that may be raised by ACTED staff and governance members; and the rules of conduct that ACTED staff and governance members must observe, in order to support them meet these rules.
2. This policy is intended to ensure that ACTED staff and governance members have an effective means of reporting grievances as defined in this policy.
3. This policy promotes, to the extent possible, a local amicable resolution of grievances as defined in this policy.



III. GENERAL PRINCIPLES

Article 5 – Neutrality

ACTED staff and governance members must fulfil their duties in a politically neutral and apolitical manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.

Article 6 – Impartiality

In the context of their professional roles and/or their missions, ACTED staff and governance members must act in accordance with the law and exercise their discretionary power in an impartial manner, taking into consideration only relevant circumstances into consideration.

Article 7 – Confidence of stakeholders

ACTED staff and governance members have a duty to conduct themselves at all times in a way that reflects and upholds ACTED's values of integrity, impartiality and efficiency and contribute to strengthen the confidence of all stakeholders.

Article 8 – Hierarchical responsibility

ACTED staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided for by law.

Article 9 – Confidentiality

Duly considering the stakeholders' potential right to access information, ACTED staff and governance members must process all the information and all the documents acquired during or as part of the exercise of their duties with the necessary confidentiality.

Article 10 – Protection of privacy

All the necessary measures must be taken to ensure that the privacy of ACTED staff and governance members is appropriately respected; as a result, the declarations provided for this policy must remain confidential, unless otherwise provided for by law.

Article 11 – Information held

1. Considering the general framework of international law regarding access to information held by private individuals, ACTED staff and governance members should disclose information only in respect to the rules and requirements applicable to ACTED.
2. ACTED staff and governance members must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.
3. ACTED staff and governance members must not seek access to information which would be inappropriate for them to have. ACTED staff and governance members must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.



4. In the same way, ACTED staff and governance members must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading.

Article 12 – Responsibility of line managers

1. ACTED staff in charge of managing or supervising other ACTED staff must do so in accordance with the policies and objectives of ACTED. They must respond to the acts and omissions of their staff which violate these policies and objectives, if they have not taken the due diligence measures expected from a person in their position to prevent such acts or omissions.
2. ACTED staff tasked with managing or supervising other ACTED staff must take the measures necessary to prevent their staff from engaging in acts likely to generate a grievance. These measures may be: to draw attention to and implement the laws and regulations; to ensure adequate training against the grievance their staff may face; and to set an example of integrity through their personal conduct.

IV. GRIEVANCE RESOLUTION MECHANISM

Step 1: Informal resolution and/or during appraisal process

Most grievances can be resolved quickly and informally through informal talk with the person(s) involved and/or with the line manager (N+1) and/or during formal appraisals.

Therefore, ACTED expects staff members to try, as far as possible, to raise their grievances informally with their line manager (N+1) and/or during formal appraisals.

It is the responsibility of the line manager to discuss in complete confidence the concerns raised by the staff involved and to try to address those concerns. The line manager may have to conduct some investigations before making a decision, if one is required.

One can request the Human Resources Department to provide further advice and guidance on the informal resolution of grievances raised.

The line manager and/or the Human Resources Department must inform the staff concerned verbally or in writing of the result.

Step 2: Mediation

The second step takes place only if the first step fails.

Either party can request that the grievance be tackled by mediation between the parties via a third party from ACTED staff.

The parties must then meet to attempt to resolve the issue with the assistance of a designated third party mediator.

If the mediation process reaches an acceptable outcome by all parties, the formal grievance process may be closed, which is confirmed in writing to the staff concerned.



If no mutually acceptable outcome is reached through mediation, Step 3 of the grievance resolution mechanism will be implemented.

Step 3: Arbitration

If steps 1 and 2 do not resolve the issue or are inappropriate, the staff concerned must submit their grievance in writing, dated and signed and complete the form, with relevant documentation, to their line manager (N+1 or N+2) and/or to the Human Resources Department in a timely manner following receipt of notification of the outcome of the step 2 of the process.

The written declaration of grievance should include the nature of the grievance, the type of request and must comprise:

- Indication that the formal grievance procedure is invoked;
- What informal measures, if any, have been taken by the employee to resolve the issue;
- A brief description of the reasons for the complaint, in particular the details, dates and names of the persons involved;
- Indication of the result expected by the staff concerned.

Upon receipt of this information, the line manager and the Human Resources Department must organize a meeting with the staff concerned to discuss the grievance.

If the grievance is not resolved, the grievance may be referred to the next level and the Country Director must be available for any questions or concerns regarding the grievance raised.

Step 4: Internal investigation

After receipt of the written grievance, an investigation regarding the grievance will be launched by the line manager; the process being supported by a representative of the Human Resources Department.

The modalities of the investigation will depend on the nature of the grievance.

The investigation is impartial and objective, and may include:

- Gathering relevant information by interviewing the complainant, or the person(s) with the grievance, any line manager involved in previous phases and potential witnesses.
- Gathering relevant documentary evidence and collecting statements, as appropriate.

The investigation will normally include a meeting with the complainant as soon as possible after receipt of the formal written grievance.

ACTED staff must ensure that any supporting evidence of the grievance is provided to the line manager in charge of grievance as soon as possible.

At the end of the investigation process and once the conclusions have been reported to the person examining the grievance, the latter will decide, in conjunction with the Human Resources Department, what measures to take, if any, and will organize a close out meeting on the grievance with the staff concerned.

The line manager and/or Human Resources Department will confirm the decision in writing to the staff who raised the grievance as soon as possible following the close out meeting regarding the grievance.



If the grievance concerned another member of staff, he or she will also be informed of the decision within the same timeframe.

The coordination and/or the Country Director will ensure that specific action decided is implemented, monitored and reviewed as required.

Depending on the circumstances and complexity/details of the investigation, the line manager and the Human Resources Director may find it necessary to produce a report summarizing the findings of the investigation, with the agreement of the parties.

Where relevant, because of the nature of the report's content (for example, where a grievance is directed against more than one person or where the report contains personal information about the employee or other persons), an extract only of the report may be provided.

Any recommendations for further action will be clearly indicated in this report. These recommendations should indicate, where appropriate, who is responsible for ensuring that any further action is implemented within the timeframe set.

In some circumstances, during the investigation, it may become apparent that a formal disciplinary measure is needed, for example where there is evidence following the investigation that a breach of the code of conduct took place.

Step 5: Information for ACTED HQ

If the previous steps fail or are not appropriate, ACTED staff can also send their grievance through ACTED's global grievance mechanism to grievance@acted.org who will review the case, classify the grievance according to the internal typology and decide what action to take, especially in case of a sensitive issue.

Writing to grievance@acted.org is a last resort.

V. IMPLEMENTATION OF THE POLICY

Article 13 – Implementation date of the policy

This Grievance Policy comes into effect after approval by the Board of ACTED on May 4th, 2018.

Article 14 – Adherence to the policy

ACTED staff and governance members certify that they adhere to these principles by signing the ACTED Policy Acceptance Form and/or by signing their employment contract.





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