

COMPLAINTS AND INTERNAL INVESTIGATION AT AVSI POLSKA

INTRODUCTION

In its work, AVSI POLSKA as a non-governmental humanitarian organization is guided by values such as neutrality, apoliticism, honesty, reliability, transparency and professionalism. Compliance with the provisions of law and with the above-mentioned values is aimed not only at ensuring the highest quality of aid that we bring to our beneficiaries, but also at ensuring the safety of the Association.

The Management Board of the Association would like to emphasize that our organization does not tolerate law violation or other abuses, and all such reported incidents will be examined in detail, and if confirmed by collected evidence, the persons committing abuse will be punished or dismissed.

This policy applies to all employees of AVSI POLSKA regardless of their place of work, position or form of employment or cooperation.

WHO CAN SUBMIT A COMPLAIN, SIGNAL AN IRREGULARITY?

A complaint may be submitted, and an irregularity may be signaled by any person who is in any way connected with AVSI POLSKA or who possesses knowledge about any irregularities or abuse of our employees:

beneficiaries who benefit from AVSI POLSKA support and members of the local community in which the organization's activities are carried out;

AVSI POLSKA employees and voluntary workers;

partners supporting AVSI POLSKA and cooperating with AVSI POLSKA;

contractors;

all other authorities and entities that have the knowledge about the activities of AVSI POLSKA (e.g. local authorities of a given country, donors, etc.).

DEFINITIONS

Complaint – formal information indicating dissatisfaction with some activity, work of another person, received service/support. The complaint is not a feedback (negative or positive), it requires taking appropriate actions and informing about the steps taken and their results.

Signalling/reporting irregularities – informing appropriate persons in a formal manner about the knowledge on abuse, irregularities, gross non-compliance with procedures, law violation or ethical doubts

regarding the behavior of AVSI POLSKA employees and other persons, partners or entities cooperating with AVSI POLSKA. The signaling of irregularities may refer to all aspects of the organization's work.

Whistleblower – a person or entity who as a result of their knowledge informs AVSI POLSKA about their suspicions regarding any irregularities, abuse or law violation on the part of the organization's employees.

HOW TO SUBMIT A COMPLAINT?

Anyone can report abuse, incident or suspicion related to what they experienced or witnessed through a special on-line link ([here](#))

In special cases, if the whistleblower cannot use the form, they can contact us by phone at or in person at the Association's office.

The recommended form of reporting is the on-line form, which is used to submit complaints about the activities of AVSI POLSKA or its employees.

Contact details of the complainant will be treated as confidential – the team accepting the complaint does not include persons directly involved in the implementation of humanitarian activities and at the initial stage it only includes selected persons in the office in Warsaw.

Our priority is to guarantee the security of the whistleblower so that their data does not reach the persons referred to in the complaint, unless the whistleblower himself agrees thereto. Reliable, complete and factual response to the questions included in the form will allow us to efficiently determine the facts and undertake corrective actions.

AVSI POLSKA's internal policy does not oblige us to examine anonymous complaints, however we will review the content of each report.

TYPES OF CASES AND PATHS OF CONDUCT IN AVSI POLSKA

Each official complaint or official notification that is received by AVSI POLSKA is registered within 3 days of its receipt in a special register under a separate number.

Each whistleblower receives information about the acceptance of the complaint, its case number and initial actions that were taken.

Depending on its nature, each case has a specific path of conduct.

In each case the whistleblower receives written feedback explaining the steps that were taken.

There are 4 types of complaints/information/signals about irregularities:

1. Sensitive matters

Sensitive matters are all matters associated with:

sexual abuse;

discrimination and unequal treatment as well as employee mobbing;

violation of the code of ethics and humanitarian values;

gross violation of security rules.

Path: Sensitive matters are considered as priorities, for which an internal investigation is immediately launched.

2. Programme matters

Programme matters are all issues related to implemented programs, in particular projects aimed at providing assistance to beneficiaries.

Programme matters are all matters associated with:

quality of the provided assistance;

poor organization of work of project teams.

Path: It should be noted that each mission has a system of submitting complaints by beneficiaries and it is recommended to use this mechanism first. Programme matters at the HQ level are taken over by Manager who determines the facts with the mission without providing the whistleblower's personal details.

Manager is responsible for informing the whistleblower about the actions taken within 14 working days of the submitted complaint.

3. Financial issues and fraud

Financial issues and fraud are all matters associated with:

corruption and embezzlement;

mismanagement, including violation of tender and purchasing rules;

money laundering and supporting terrorism.

Path: As part of the proceedings, it is expected that it will take up to 30 business days to collect and summarize the facts and evidence and to make a final decision on the measures to be applied: closing the case or instituting an internal investigation.

4. Other abuses/violations of law or procedures of AVSI POLSKA regarding all aspects of the AVSI POLSKA'S work, referring to its internal procedures and external law, not included above.

Path: As part of the proceedings, it is expected that it will take up to 30 business days to collect and summarize the facts and evidence and to make a final decision on the measures to be applied: closing the case or instituting an internal investigation.

Important: This complaint submission mechanism does not refer to the standard employee complaints arising from the execution of activities entrusted to employees by the employer, which should first and foremost be reported to the immediate superior. If the matter does not concern sensitive issues, it is sent back to the immediate superior.

INITIATION OF AN INVESTIGATION

The Management Board of AVSI POLSKA, after collecting the necessary information and evidence by the Compliance Manager, decides on whether or not to initiate an internal investigation. Guidelines on how to conduct an internal investigation can be found in the guide on conducting internal investigations.

SUPPORT AND PROTECTION OF THE COMPLAINANT AND WHISTLEBLOWER DURING THE PROCEEDINGS AND INVESTIGATION

All complaints or reports of abuses and irregularities submitted to AVSI POLSKA will be taken very seriously, and actions related to them will be taken without unnecessary delay.

Each whistleblower has full assurance that AVSI POLSKA will retain their anonymity and provide them with protection against the persons who are the subject of complaints or who are covered by such complaints.

All persons dealing with a given case are obliged to observe the principle of full confidentiality and discretion in the proceedings at each of their stages.

CONCLUSIONS (DISCIPLINARY ACTION)

Employees found to have caused abuse and irregularities will be subject to disciplinary action that may even result in immediate dismissal.

Volunteer workers, contractors and other representatives, in the case of finding any abuses, must be prepared for immediate termination of cooperation with AVSI POLSKA. If the suspected criminal offense is confirmed, the case should be reported to the competent national authorities.

If as a result of the proceedings, the reported suspicion is not confirmed, the person will be cleared of all suspicion. However, if it turns out that the Whistleblower reported false suspicions in order to harm the person being suspected, he will also be subject to disciplinary proceedings that may even result in termination of the employment relationship.

Disciplinary actions are taken by the managerial staff at the appropriate level.

A person at AVSI POLSKA who is responsible for the process of submitting complaints and signaling irregularities, including for keeping a register and contacting whistleblowers, is the President of the MB.

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