

Catalpa External Complaints and Feedback Policy

| | |
|-------------------|--------------|
| Original version: | October 2023 |
| Next review: | October 2026 |

1. Preamble

1.1 Statement of commitment

Catalpa International is committed to the highest standards in delivery of the high-impact programming it undertakes, and understands that transparency and accountability is key to implementing this commitment.

Catalpa acknowledges that there may be times that we do not meet our own standards, and in these situations receiving a complaint is an important way of learning and improving while also mitigating any harm that could be caused to stakeholders including in the communities we work in.

Our stakeholders have a right to raise any reasonable concern and provide feedback in a safe and confidential manner, and to do so in the secure knowledge that the complaints will be appropriately handled.

1.2 Policy review and ratification

This Policy has been reviewed and formally ratified by Catalpa's Senior Leadership Team. It is subject to review every three years or more often as necessary.

1.3 Policy linkages

This Policy is to be enacted alongside obligations confirmed in additional Catalpa policies including:

- Code of Conduct
- Child Safeguarding Policy
- Prevention of Sexual Exploitation, Abuse and Harassment Policy
- Internal Complaints and Feedback Policy
- Whistle-blower Policy
- Gender Equality Policy.

2. Purpose

The purpose of this Policy is to promote accountability to stakeholders through ensuring that Complaints and/or feedback can be provided in a safe and confidential manner and that all complaints will be treated seriously; and to provide guidance to Catalpa staff in how to handle complaints accordingly.

3. Scope

This Policy solely deals with external complaints related to Catalpa's work, for example from a downstream partner, a community member in the project localities, a government agency with which we liaise, a donor or a member of the public.

Internal issues and grievances made by staff are dealt with according to our Internal Complaints and Feedback Policy, except where it relates to child safeguarding and/or prevention of sexual exploitation, abuse and/or harassment (SEAH) for which policy commitments are outlined in Catalpa's Child Safeguarding Policy and Prevention of SEAH Policy respectively but which fall within this Policy in terms of how complaints will be handled and investigated. A downstream partner, external stakeholder or community member can also raise a complaint about the conduct of Catalpa personnel in relation to child safeguarding and/or SEAH allegations.

If a current or former Catalpa employee, volunteer, Board Director, contractor and/or consultant or service provider wishes to raise an issue of wrongdoing or malpractice within Catalpa, this should be dealt with according to the Whistleblowing Policy.

A definition list is provided at Annex One.

A flowchart of how different complaints and grievances are handled by Catalpa is provided at Annex Two.

A guide as to who can make a complaint and about which issue within this Policy is outlined below in Table 1.

| Types of Complaints | | Relevant Complaints Mechanism |
|---------------------|---|--|
| Allowed | Complaints from external stakeholders that Catalpa, as an organisation, has not lived up to the standards it has adopted within its Policies. This includes child safeguarding and SEAH concerns. | Please refer to Section 5 of this Policy for the different ways you may lodge a complaint. |
| Allowed | Operational complaints, i.e. downstream partners of Catalpa disagreeing over areas of operation, funding sources, priorities, differences | Please refer to Section 5 of this Policy for the different ways you may lodge a complaint. |

| | | |
|------------------------|--|---|
| | of interest between the public relations interests of the funding partners, the capacities of implementing partners, or non-compliance with Catalpa programmatic principles, among others. Complaints may also relate to Catalpa, e.g. regarding decisions on funding appeals, strategy implementation, management issues, and the like. | |
| Allowed | Anonymous complaints. If you have genuine concern about revealing your identity please confirm this when you contact us. | Please use the Stopline whistleblower and external complaints hotline. Refer to Section 5 of this policy. |
| Allowed | Catalpa staff complaints against other staff related to child safeguarding and/or prevention of sexual exploitation, abuse or harassment | Catalpa's policy commitments related to child safeguarding and/or prevention of sexual exploitation, abuse and/or harassment (PSEAH) for which policy commitments are outlined in Catalpa's Child Safeguarding Policy and PSEAH Policy respectively but this Policy outlines how complaints will be handled and investigated. |
| Not within this Policy | Feedback from the general public that does not relate to misconduct or arise to the level of a 'complaint' but is rather general input about our operations | Feedback can be provided to the relevant contact person at Catalpa directly. |
| Not within this Policy | Catalpa staff complaints against other staff regarding any issue aside from child safeguarding and/or prevention of sexual exploitation, abuse and harassment | These complaints should use Catalpa's Internal Complaints and Feedback Policy. |

| | | |
|------------------------|--|--|
| Not within this Policy | Complaints from any Catalpa stakeholder about a Catalpa staff member, Board Director, volunteer or representative for breaching one of our two Codes of Conduct, which are mandatory Catalpa standards for individual behaviour. | Please see the Catalpa Whistleblowing Policy |
| Not within this Policy | Catalpa staff complaints about another organisation or one or more of its employees. | Such complaints should be raised with Catalpa management and the staff member should be supported through the process of raising and addressing the complaint. |
| Not within this Policy | Complaints against one or more employees of a third party organisation (e.g. not Catalpa or one of its partners and not complaints raised Catalpa staff, volunteers or consultants / contractors) | Such complaints must be addressed to the management or governing board of the organisation. |
| Not within this Policy | Offensive, malicious or abusive complaints, including complaints sent to as part of a bulk email to multiple organisations. | Catalpa will not respond to these complaints. |
| Not within this Policy | Complaints relating to ongoing legal proceedings. | Catalpa will not hear these complaints until the case is resolved, unless the complaint brings additional and relevant evidence forward |

4. Policy Principles

The core principles that guide Catalpa's Complaints and Feedback Policy include that Catalpa will:

- i. Be responsive and fair in receiving and handling all Complaints, using timely and transparent procedures to investigate all incidents, including:
 - Ensuring that those reporting allegations are protected
 - Ensuring that alleged perpetrator(s) are afforded due process
 - Confidentiality is upheld at all times.

- ii. Have a clear and documented process for receiving and handling complaints to ensure all complaints are taken seriously, including:
 - Having an investigation procedure with a triage system for escalating serious incidents
 - A referral process for Complaints that do not fall within the scope of this policy
- iii. Ensure that all stakeholders are aware of reporting and complaints procedures, including both:
 - External stakeholders: Catalpa will make this Policy readily available on our website as well as consider methods for reporting that take into consideration the needs of the most vulnerable and disadvantaged stakeholders who may need to make a complaint
 - Ensure staff and volunteers are equipped to understand and implement the Policy in case a stakeholder makes a disclosure or report to them
- iv. Catalpa will employ a survivor-centered approach to all investigations including appropriate assistance and referrals for victim / survivors.
- v. Catalpa will ensure that where we have direct contact with stakeholders and community members regarding Catalpa programming, they have information about how to report and that this is part of programming including posters, sharing websites, community and stakeholder briefings as appropriate and to foster child / youth friendly reporting mechanisms wherever possible.

5. Before you make a complaint

If you are facing an issue with Catalpa personnel regarding a minor issue, you can opt to approach that person directly or their line manager to raise the concern or issue informally in the first instance. If you are not satisfied with the response or outcome, you could proceed to the formal complaint process (as below) as a second step.

The exception to this would be in cases where serious misconduct is alleged or suspected, or in any case related to child safeguarding issue or a sexual exploitation, abuse and harassment issue: in these cases we ask you to proceed directly to a formal complaint system as below.

6. Making a complaint

6.1 Who to make a report to

Concerns or reports can be provided via email to feedback@catalpa.io or by phoning the Catalpa Chief Operating Officer Brian Francisco (also the Safeguarding Focal Point) on brianfranciso@catalpa.io or by phoning on WhatsApp +17547027426

Further information about different kinds of complaints is provided below:

- Child safeguarding concerns, and/or Prevention of sexual exploitation, abuse and harassment: Email safeguarding@catalpa.io or phone the Safeguarding Focal Point on WhatsApp +17547027426
- As per the Whistleblowing Policy, if an eligible whistleblower (someone connected to Catalpa) reports a 'disclosable matter' to a Catalpa 'protection officer' (including the COO, or the People and Culture Manager) then they will be protected under the Whistleblowing Policy - please see the Whistleblowing Policy for more information including for definitions.
- Reports can be made to Catalpa via Stopleveline, an independent third party platform which allows anonymous reporting and provides support to people trying to report including translation / interpretation services if needed. You can reach Stopleveline on:

Telephone: 1300 30 45 50 (Australia Only)

Email: makeareport@stopleveline.com.au

On-line: <https://catalpa.stoplevelinereport.com>

Mail: Catalpa International, c/o Stopleveline, PO Box 403, Diamond Creek, VIC 3089

6.2 Timing of making a complaint

It is mandatory as part of this Policy that if any personnel or associate of Catalpa has a suspicion or disclosure regarding child safeguarding and/or any issue of sexual exploitation, abuse or harassment, or any issue related to fraud, corruption and/or terrorism, this must be reported immediately (within 24 hours).

6.3 Other information regarding making a complaint

6.3.1 What to include in a complaint

When lodging your complaint, please include your name, address or email address and contact telephone number in your email or letter so that we can contact you if we require further information. Where possible, let us know how you would like your complaint to be resolved.

6.3.2 Mandatory obligation to report some issues

If a member of Catalpa personnel is aware of a safeguarding issue, they are required under the Catalpa Code of Conduct to report the issue immediately.

- **Child Safeguarding Policy** (for issues related to children): regardless of whether the victim / survivor wants the issue to be reported, the issue must be reported
- **Prevention of Sexual Exploitation, Abuse and Harassment Policy** (for adults including Catalpa personnel and stakeholders in the wider community): If the adult survivor / victim does not wish to be identified, the person reporting the allegation of misconduct should not identify the survivor / victim. Equally if the survivor / victim wishes to make a firsthand anonymous complaint, they can do so using the reporting procedures set out below.
- **Fraud and Corruption Policy**
- **Occupation Health and Safety Policy** for significant injuries or death reporting to workplace authorities (depending on the country)
- **Domestic and Family Violence Policy** in cases of imminent safety issues
- **Data Privacy and Storage Policy** regarding unauthorised access breaches that meet certain criteria (see Policy for more details).

Community members or external stakeholders are also encouraged to report any suspicions or concerns regarding any misconduct they are aware of, using the information below.

Catalpa will not accept a complaint more than six months after the alleged incident, except in exceptional circumstances and then only in cases of allegations of abuse, exploitation, fraud, gross misconduct or malpractice.

6.3.3 Confidentiality of reports

Information regarding a report of misconduct and any subsequent investigation will be treated confidentially to safeguard the survivor / victim and any complainant who raised the allegation, and also to provide due process for the alleged perpetrator. Catalpa will do this by providing information about the issue only on a 'needs to know' basis within the investigation team, redacting identifying details where possible, using qualified investigators who are aware of their obligations to keep confidentiality and storing information correctly so that it can not be seen or accessed by a wider group of staff or stakeholders.

If the disclosure was made under the Catalpa Whistleblowing Policy, all requirements of that Policy will be followed including ensuring no disclosure of the identity of the Whistleblower.

7. Complaints Handling including Investigations

7.1 Recording the incident in the Complaints Log and notifying the Confidential Reporting and Investigations Committee

If the complaint is made directly to the Chief Operating Officer / Safeguarding Focal Point, they will immediately fill in an incident reporting form in the Stopline database¹ “complaints log” (if an Incident Reporting Form has not already been filled by the reporter). An email should be sent the same day the complaint was received to notify² the core members of the Confidential Reporting and Investigation Committee³ that a complaint was received and the broad nature of the complaint; although any members of this Committee involved in alleged wrong doing should not be notified.

If the report is made to someone other than the COO/ Safeguarding Focal Point, that person will notify the Safeguarding Focal Point and then maintain confidentiality by not sharing the report further.

7.2 Preliminary steps to assess whether or not an investigation is needed and if so, what type

At this stage an investigation is not launched, as preliminary steps are to be taken first by the COO / Safeguarding Focal Point (or their qualified delegate⁴) as outlined below. Subsequent steps are determined by which policy the Complaint falls under and more details are available in each Policy, summarised in the flowchart at Annex Two.

For all complaints, as preliminary steps the Chief Operating Officer / Safeguarding Focal Point or their qualified delegate will:

- gather more information about the complaint to establish whether the issue is within the scope of this Policy; if it is not within the scope of this Policy (i.e. it is a internal staff grievance / complaint), the Chief Operating Officer / Safeguarding Focal Point will refer the matter for handling under the applicable policy.
-
-
-

¹ Stopline has enabled Catalpa to store / record internal complaints in the confidential database system Catalpa has access to via Stopline, so that it can act as a complaints register of all complaints received and not only those received by Stopline. When Catalpa records an internally-received report in the Stopline system, we need to indicate ‘yes’ in the dropdown box “Raised internally (was this complaint raised by stopline or your company?)”

² At this stage in the process, all complaints should be treated as possible Whistleblowing events, i.e. the catalpa Whistleblower policy should be followed to ensure NO identifying information of the complainant is shared. For example “A Catalpa staff member has reported sexual harassment in the office where they work in the last month” not “a female Catalpa staff member (name) working in PNG has reported that (name) has inappropriately touched them yesterday”.

³ See the ‘ToR - Confidential Reporting and Investigation Committee’ (at Annex 1 of the Safeguarding Group Terms of Reference” for Committee composition.

⁴ A qualified delegate would be a Whistleblowing Protection Officer as listed in the Safeguarding Group Terms of Reference.

- identify immediate and potential risks to any victim / survivor (if the nature of the complaint means there is a victim / survivor in this instance) and if so, to develop and implement an action plan⁵ focused on:
 - to ensuring the safety of the victim / survivor and – if different – of the complainant
 - To identify referrals or support for the victim / survivor with the consent of the victim / survivor and based on their preference for how support is provided⁶
- establish which further reporting obligations need to be fulfilled, such as
 - reporting the matter to local police – this should only be done with the permission of the victim / survivor if they are an adult; in the case of children all incidences must be reported
 - report the matter to a donor in accordance with contractual obligations to donors if applicable based on contracts with those donors. In the case of Australian DFAT or New Zealand MFAT, there are obligations for immediate notification to DFAT and/or MFAT. Further, Catalpa’s Chief Operating Officer / Safeguarding Focal Point must seek to ensure that any missing details are obtained and then provided to DFAT within 14 days.

7.3 Investigations

7.3.1 Determining whether or not an investigation is warranted

The Chief Operating Officer / Safeguarding Focal Point (or their qualified delegate) should use the information collected above (see section 7.2) in regard to the nature and scale of the complaint, risks to persons involved and any alleged criminality to make a recommendation as to whether an investigation is required or not.

In the event that the CoO / Safeguarding Focal Point or their qualified delegate determines that an investigation is required, the Committee should convene / meet to decide on the same day whether an internal or external investigation is needed - see section 7.3.2 - and who on the Committee should be responsible for the investigation process - see section 7.3.3.

⁵ In a case of sexual harassment of personnel associated with Catalpa business or undertaking, an Immediate Response Plan based on Respect At Work’s resource document here will be utilised <https://www.respectatwork.gov.au/sites/default/files/2022-08/Immediate%20Response%20Plan%20example.pdf>

⁶ The victim/ survivor may wish to contact 1800RESPECT / 1800 737 732 (the Australian national domestic, family and sexual violence counselling, information and support service) or mental health support services including Lifeline (24 hour crisis support and suicide prevention on 13 11 14 or see lifeline.org.au) or Beyondblue (ph. 1300 224 636 or beyondblue.org.au)

7.3.2 Determining whether a complaint warrants an Internal and external investigations

In the event that the CoO / Safeguarding Focal Point or their qualified delegate determines that an investigation is required, the Committee should convene / meet to decide the same day whether an internal or external investigation is needed - see section 7.3.2

A threshold criteria for determining how to proceed is below:

(i) Type of complaints that should be referred to external investigation by qualified investigators with experience in sensitive investigations:

- Any allegation of gross misconduct including as it relates to financial management / fraud, terrorism, child safeguarding and/or prevention of sexual exploitation and harassment, conflict of interest, or other gross violation of Catalpa's Code of Conduct. Examples of this would include any incident where a child or adult has been exploited or abused or where there is a pattern of ongoing bullying or discrimination alleged. It should also include any complaint which alleges wrong doing by a member of the Confidential Reporting and Complaints Committee, as the Committee should not investigate internally allegations related to another member of the Committee.

(ii) Type of complaints that can initially be investigated internally by Catalpa's Confidential Reporting and Investigations Committee who have received training in sensitive investigations, and later referred for external investigation if gross misconduct is unearthed during the course of the initial internal investigation:

- Allegations of violations of Catalpa's policies that are likely to be accidental, non-malicious and do not comprise gross misconduct. Examples of this could include a staff member who sought to follow Catalpa's Child Safeguarding Policy but is alleged to have used the wrong process and/or wrong template to obtain informed consent for photographs; or where a staff member makes a 'joke' which is insensitive / inappropriate / sexist / racist.

(iii) Type of complaints that do not need to be investigated but should nevertheless be logged in the Complaints log to enable tracking of trends and follow up at a later date if necessary:

- Sexual harassment allegations where the adult survivor / victim has made an informed decision to pursue a different resolution pathway⁷ such as early intervention and/or informal pathways.
- Nuisance complaints or ineligible complaints i.e. where the allegation relates to a project or piece of work that was conducted by another organisation Catalpa has no dealings with.

7.3.3 Conducting Internal and external investigations

⁷ More information on these pathways for sexual harassment is available here <https://www.respectatwork.gov.au/organisation/response/reporting/resolution-pathways>. Further, see section 7.1.3 of the Prevention of Sexual Exploitation, Abuse and Harassment Policy for more information

In the same meeting to determine whether or not an internal or external investigation is needed (as above, section 7.3.2) the Committee should determine (i) who on the Committee will be part of that investigation (if internal); or (ii) who on the Committee will oversee / contract an investigator and supervise the investigation (if external) and to view the guidance below regarding investigations. In all cases there should be one 'Investigation Officer' to act as the focal point for each investigation nominated from the Committee⁸ who will be responsible for ensuring communication with the rest of the Committee, organising Committee meetings to progress the investigation, liaison with an external investigator (if needed), liaison with the complainant and the victim / survivor if different to the complainant, keeping the Complaints Log (in the Stopleveline database) up to date, and ensuring that all delegated members of the Committee (i.e. those who will be involved in this investigation) have access to the information about this investigation in the Stopleveline complaints log / database.

The Confidential Reporting and Investigations Committee will be guided by the following:

- If required, Catalpa can suspend or transfer the alleged perpetrator (if known and if serious misconduct alleged i.e. safeguarding issues) during the investigation, and identify what disciplinary steps would be relevant in the event that the investigation indicates misconduct (this step may also be taken at the pre-investigation stage if appropriate)
- Where an investigation is warranted, Catalpa will follow the guiding principles below:
 - investigations should be undertaken only by experienced and qualified professionals who are trained in sensitive investigations and on a victim / survivor – centred approach. All core members of the Confidential Reporting and Investigations Committee need to have received training from Stopleveline in investigations. Depending on the nature of the complaint (see section 7.3.2 above), it may be necessary to outsource the investigation to an external service provider such as Safeguarding Services (for child safeguarding and/or PSEAH) or Stopleveline (for all other incidences such as fraud etc.).
 - Catalpa is committed to ensuring that the safety and wellbeing of any victim / survivor and their dignity and rights remain the overriding concern at all times
 - Catalpa will deal with all reports in a timely manner.

⁸ The Investigation Officer for each investigation would likely change for each investigation depending on a) the type of complaint being responded to and other details i.e. for Timor based investigations it may be most sensible to have one of the Confidential Reporting and Complaints Committee members in Timor as the designated 'investigation officer'. If the complaint relates to financial issues it may be most sensible for a member of the Committee in the Operations team to take on this role etc. b) workloads of the Committee members. In all cases, the Investigation Officer must be a member of the Confidential Reporting and Investigations Committee, and as such be either a 'Whistleblower Protection Officer' or a 'Whistleblower Investigation Officer' according to the Catalpa Whistleblowing Policy.

- While noting that any investigation needs to be conducted thoroughly, in such a way as to best address risk, all efforts should be made to complete investigations within 60 days (it may be a requirement to submit a final report to the donorT within 60 days in safeguarding cases).
- Ensure that the interests of anyone reporting in good faith are protected
- Where a report is made in good faith and on reasonable grounds Catalpa will act in the best interest of the person who made the report to protect them from any victimisation, adverse reaction or intimidation and ensure they will not be disadvantaged in their employment with Catalpa.
- A member of staff, volunteer or member who intentionally makes a false or malicious report may be subject to disciplinary action. A contractor who intentionally makes a false or malicious report may be subject to termination of contract.
- Where safe to do so, and when in accordance with the wishes of any victims / survivors and/or whistleblowers, all alleged incidents that involve a criminal aspect should be reported through the correct local law enforcement channels. To protect the privacy of alleged perpetrators, victims/survivors, and whistleblowers, information provided to Catalpa will be handled in accordance with the Privacy Act 1988 (Cth).
- If Catalpa is requested not to take any further action by the person making the allegation, for instance out of fear for the security of the victim / survivor, the Catalpa COO must liaise with the victim / survivor to establish and document their wishes on the matter.

If the allegation is reportable to a donor such as DFAT or MFAT or other under their Safeguarding policies, Catalpa's Safeguarding Focal Point must still notify DFAT and/or MFAT but should acknowledge the security concern in the report.

- During an investigation, the Stopline Complaints Log should be kept up to date by this investigation's focal point for the investigation including the eventual outcome of the investigation (see section 7.3.4 below) and the focal point should ensure that . All sensitive data / information should be stored in the Stopline system.

7.3.4 Outcome of investigations

Once the internal or external investigation is complete, the outcome of the investigation should be detailed in a written report (by the Catalpa investigation officer for internal investigations, or by the external service provider/investigation officer for external investigations) that is shared with the members of the Confidential Reporting and Investigation Committee who were part of this investigation.

The relevant members of the Confidential Reporting and Investigation Committee (i.e. those who were part of this investigation) should convene and decide together the

outcome of the investigation. When the Committee cannot decide by consensus, the decision making ultimately lies with the Director(s) on the Committee.

Where the complaint relates to serious misconduct, Catalpa will offer assistance to the complainant/victim/survivor with their consent. This may include counselling, medical, social, or legal assistance, or referral to such services.

Catalpa will take appropriate disciplinary action against any employees, interns, volunteers, board members, individual contractors, and grantees/partners who have breached this policy. Disciplinary action is defined in full at Annex One and there is more information in the “classification of disciplinary action” guide in the employee Handbook for more information.

In cases of sexual harassment, Catalpa will be guided by the Respect at Work guidance regarding outcomes and consequences [here](#).

Even in cases of anonymous complaints or where an investigation has not proceeded, Catalpa commits to ensuring steps are taken to promote learning and improvement which could include:

- Undertaking a general campaign about appropriate workplace behaviours, with a focus on the area the complaint was generated
- Providing a reminder to all staff of Catalpa's policy/ies, reporting and resolution procedure and supports as well as encouraging workers to raise a concern
- Implementing new procedures or systems of work that reduce the possibility or opportunity for further misconduct to occur
- Further, if there was insufficient information for an investigation to proceed but a perpetrator(s) or department misconduct was identified in the allegation, Catalpa will consider:
 - Initiation of a 360 review, health check or similar in an area where anonymous reports suggest there may be issues however no formal complaints have been received
 - Where there are several similar complaints from the same department or area, extra targeted training may be utilised
 - In the case of receiving numerous anonymous reports against the same person, Catalpa can instigate an independent investigation observing all necessary standards and procedural fairness
 - To obtain further information, speaking with other members of the alleged respondent's team to identify whether there is a cultural issue or pattern of conduct, or the roll out of broader pulse surveys could be used to further test concerns. A pulse survey is usually a simple short survey to gauge worker insights on a particular issue
 - Monitoring the alleged respondent's behaviour and intervening if new issues arise, including possible victimisation.

8. Communicating the policy

This Policy will be published on Catalpa's website.

All Catalpa personnel, associates and downstream partners will receive orientation on this Policy, and training will be provided for new staff and on a refresher basis.

Where possible, communications material regarding complaints handling and processes will be developed and translated into the local languages of the communities in which we work.

9. Policy Monitoring and Review

Monitoring application of the policy is the responsibility of all staff, particularly the Chief Operating Officer. In order to ensure compliance with this Policy, Catalpa will undertake spot checks annually of policy compliance within its operations.

Annex One: Definitions

Complaints: Catalpa defines a complaint as a formal expression of dissatisfaction or discontent, and/or misconduct about someone or something, from outside of Catalpa. For the purposes of clarity, it is distinct from a 'grievance' is a complaint raised by a Catalpa personnel or associate. Types of complaints:

- **Operational Complaints:** this may include Catalpa partners disagreeing over areas of operation, funding sources, priorities, differences of interest between the public relations interests of the funding partners, the capacities of implementing partners, or non-compliance with Catalpa programmatic principles, among others. Complaints may also relate to Catalpa, e.g. regarding decisions on funding appeals, strategy implementation, management issues, and the like.
- **Sensitive Complaints:** Allegations of harassment or bullying, of sexual exploitation and abuse, fraud and corruption or other gross misconduct are considered by Catalpa as "sensitive" complaints. The policy supports the confidential handling of information related to sensitive complaints. It also ensures that sensitive complaints are addressed by senior management.
- **Anonymous complaints:** At times people who have genuine concerns may not be able to speak out because of special circumstances and may wish to lodge a complaint with a staff person without revealing their identity to a wider audience. In this instance, we will accept the complaint and will endeavor through best efforts to protect the complainants identity through the course of the investigation and required reporting.
- **Malicious and Vexatious complaints:** Catalpa under the assumption that all complaints are made in good faith and are not motivated by intent for personal gain, personal interest or a grudge. However, should a subsequent investigation reveal a complaint to be malicious or vexatious – an accusation that the complainant knows to be false - any investigation underway must be stopped immediately and the Subject of Complaint (SoC) cleared. Complaints lodged for genuine reasons that are subsequently considered to be unfounded shall not be treated as malicious. If a malicious complaint is made by a Catalpa employee, disciplinary measures must be taken.

Complaints log: It is a requirement of Catalpa's safeguarding policies that all complaints received of misconduct are recorded in one consolidated confidential Complaints Log. As Stopline provides a password protected database for this purpose to Catalpa, Catalpa has decided to use the Stopline Complaints Log as the one-stop-shop recording all complaints regardless of whether they were received via Stopline or not. When the complaint was not received via Stopline (i.e. was received directly from Catalpa), Catalpa can still log the complaint in the Stopline system by selecting 'yes' in the 'internally raised?' dropdown menu.

Confidential Reporting and Complaints Committee: This Committee is comprised of Catalpa personnel who have been trained in investigations by Stopline and who have either been designated Whistleblower Protection Officers or Whistleblower

Investigation Officers in the Stopline-based Complaints Log Catalpa uses with associated access to the information regarding specific investigations. Within this Committee, only some members need be involved in each investigation - see section 7.3 for more detail. The ToR for this Committee is in Annex 1 of the [Safeguarding Group ToR here](#) (update link when finalised / live).

Disciplinary action:

Action against personnel and associates may include:

- Performance management;
- Further training on this policy;
- Formal warning and monitoring;
- Transfer to other duties;
- Report to law enforcement;
- Suspension or dismissal.

Action against individual contractors may include termination of the contract.

Action against grantees/partners may include:

- Requirement to strengthen prevention of sexual exploitation, abuse and harassment in their organisation, including training, audits and spot checks
- Report to law enforcement
- Suspension, amendment or termination in whole or in part of the grant agreement.

There is more information in the “classification of disciplinary action” guide in the employee Handbook for more information.

Feedback: We distinguish the term ‘complaint’ from ‘feedback’. Feedback is any positive or negative informal statement of opinion about someone or something – an opinion shared for information but without the intention of lodging a formal complaint. A complaint requires a response, but feedback may not.

Investigation Officer: Each investigation, the most appropriate member of Catalpa’s Confidential Reporting and Investigations Committee will be designated the focal point for the internal or external investigation. This determination is made based on criteria outlined in footnote #8. Their responsibilities include ensuring communication with the rest of the Committee, organising Committee meetings to progress the investigation, liaison with an external investigator (if needed), liaison with the complainant and the victim / survivor if different to the complainant, keeping the Complaints Log (in the Stopline database) up to date, and ensuring that all delegated members of the Committee (i.e. those who will be involved in this investigation) have access to the information about this investigation in the Stopline complaints log / database.

Safeguarding: Actions, policies and procedures that create and maintain protective environments to protect people from exploitation, harm and abuse of all kinds. Catalpa has two policies directly related to safeguarding: Child Safeguarding Policy, and Prevention of Sexual Exploitation, Abuse and Harassment Policy.

Safeguarding Focal Point: The Catalpa Chief Operations Officer / Chief Finance Officer is the designated Safeguarding Focal Point, whose responsibilities are outlined in the [Safeguarding Group ToR here](#).

Safeguarding Group: The Catalpa Safeguarding Group is a group of staff working on enhancing Safeguarding within Catalpa. Its [Terms of Reference can be found here](#).

Victim / Survivor: A person who is, or has been, sexually exploited, harassed or abused

COMPLAINT HANDLING DECISION TREE

Which policy, if any, provides guidance in responding to this complaint / report / feedback?

