

## 1. General Terms

### 1.1. Purpose

The purpose of the reporting procedure for integrity violations is to ensure that anyone who wishes to report suspected violations of integrity can do so in a safe manner. The procedure guarantees an adequate and timely handling of complaints. Correct complaint handling also serves the collective aim of improving the profile of the humanitarian sector.

### 1.2. Regulations and procedures

This procedure does not replace obligations arising from regulations and/or internal documents such as existing policies, the ethical code and work regulations. The complaints handling procedure is complementary to this and does not affect other established procedures.

### 1.3. Scope

#### What?

This procedure applies to complaints or reports regarding integrity violations committed by APOPO, including its directors, employees, contractors, interns, and volunteers in the performance of their duties.

Violation of integrity includes any breach of financial or moral conduct, in accordance with the Code of Ethics and Professional Conduct or other internal and external regulations. It concerns, for example, fraud, corruption and conflicts of interest, incorrect use of financial resources and non-compliance with financial regulations, moral and sexual harassment, and discrimination (non-exhaustive).

#### Who?

All APOPO stakeholders can file a complaint or report. Stakeholders include all employees, contractors, volunteers, interns, directors, partners, and beneficiaries of APOPO.

#### How?

A complaint or report can be submitted directly via the form on our website (tab - Contact us) or by email to Complaints manager Gerrit Ruitinga: [complaints@apopo.org](mailto:complaints@apopo.org). The message contains at least the following elements:

- Your name and surname
- The nature of your relationship with APOPO
- Your contact information such as your email address and phone number
- All persons and parties involved
- When and where the event took place
- A precise description of the facts

After sending the complaint to the complaint manager, the reporter will receive an acknowledgement of receipt.

The decision about the handling of complaints and feedback to the reporter and possible victim must be made within the period of 1 month.

### 1.4. Other reporting channels

An informal report is possible before a formal report or complaint is submitted. The reporter can at any time discuss his/her suspected violation confidentially with an employee, his/her supervisor, the

Complaints manager (Gerrit Ruitinga [complaints@apopo.org](mailto:complaints@apopo.org)) or the Integrity adviser (Esther Haalboom [confidant@apopo.org](mailto:confidant@apopo.org)). If necessary, they inform the reporter about the formal reporting procedure.

Reports can also arise from internal controls such as financial audits and controls.

## 2. Preliminary investigation

### 2.1. Purpose of the preliminary investigation

The purpose of the preliminary investigation is to determine whether a disciplinary investigation must be conducted. During the preliminary investigation, the complaints manager will assess the admissibility of the complaint, the authenticity of the alleged facts and the provability of the complaint, and then decide whether to declare the complaint admissible. This preliminary investigation must be completed within one month after the complaint has been lodged.

### 2.2. Conditions of admissibility

A complaint or report is admissible if;

1. It concerns a complaint regarding a possible breach of integrity as described in the Code of Ethics and Professional Conduct;
2. The complaint is submitted in the manner as previously described under the sub-title "How";
3. The facts to which the complaint relates did not take place more than five years ago. For facts committed over a longer period, the last fact is taken into account;
4. The complaint was made via the online form on [the website](#) or by email ([complaints@apopo.org](mailto:complaints@apopo.org));
5. The complaint was not made anonymously;
6. The complaint was not yet submitted and followed up previously.

Admissibility is assessed by the complaints manager, who can be assisted, if necessary, by the director of the Flemish federation of NGOs for development cooperation (NGO federatie) and other carefully chosen advisers.

### 2.3. Result and report of the preliminary investigation

The complaints manager draws up a report of the preliminary investigation. If the preliminary investigation shows that this is a potentially high-risk situation that requires urgency, this will be stated in the report, and it will be given priority.

The report of the preliminary investigation contains the admissibility assessment and an initial proposal for further investigation.

If based on the report of the preliminary investigation, there is no reason to initiate further investigation, the reporter will be notified. This notification to the reporter contains a brief motivation for the rejection of the complaint.

## 3. Investigation and settlement

### 3.1. Investigation of the complaint

The complaints manager starts an investigation. The investigation is bound by the findings in the report of the preliminary investigation but may be extended if the investigation so requires.

Based on the investigation, it is decided which persons will be involved and whether the investigation will be conducted internally or externally. Discretion and confidentiality are guaranteed as much as possible. This approach is used throughout the investigation and in all investigative acts. The research is carried out in accordance with the guidelines of the Belgian NGO Federation.

Each complaint requires an individual approach. All investigative actions and steps taken are documented. This file contains background information, documents received, findings, and the parties contacted and involved (whether or not anonymously).

### **3.2. Principles and guarantees**

A number of principles deserve special attention and must always be respected during the course of the research. This includes (non-exhaustive) confidentiality of information, proportionality, treatment within a reasonable period, absence of bias and protection of the formal reporter and victim(s). In all investigative actions, the facts, sensitivity, risk, and complexity of the complaint are always taken into consideration.

### **3.3. Result of the investigation and imposition of measures**

If the investigation shows that any criminal offenses have been committed, legal advice will be sought, after which any judicial steps will be taken.

If it appears that an integrity violation has been committed, appropriate measures will be taken against the perpetrator. The appropriate sanction will of course depend on the file and be a mediation, an amicable settlement, a reprimand, a warning or immediate dismissal with formal referral to criminal authorities (non-exhaustive).

The sanction is determined by the Complaints manager in consultation with the management or the Board of Directors of APOPO.

### **3.4. Handling of the investigation**

Each investigation is registered afterwards and archived for a period of 5 years.

The result of the complaint investigation will be communicated to the reporter and/or the victim of the violation within a reasonable period.

## **4. Communication**

Fair handling of complaints with respect for the protection of the victim and the reporter is always prioritized over communication interests and considerations. Only the actors are involved in the procedure. Every communication requires an accurate moral assessment.

Only if others besides the reporter, victim and perpetrator are at risk of any form of damage, they will be informed of the situation, provided that they also respect principles such as confidentiality.

The desirability, timing, tone, and content of other external communications is always evaluated against the circumstances of the specific situation. Any communication always considers the interests and rights of the victim, perpetrator, the public, the sector, and any other parties involved.

Complaints manager Gerrit Ruitinga reports about the complaints dealt with the former year in the annual General Assembly meeting. For the protection of reporter, victim and/or other parties involved, he does not disclose sensitive or case-specific data. The annual reporting and analysis of complaints and integrity violations ensures that the handling procedure is improved each year.