

DOCUMENT			PAGE
Handbook for handling complaints, Act Church of Sweden			0(12)
APPROVED BY	DATE	DOCUMENT REFERENCE	VERSION
Director Act Church of Sweden	2025-02-12	Handbook	2.0

1	Introduction	1
2	Scope and limitations of Act Church of Sweden's CRM	1
2.1	Who can complain?.....	1
2.2	Duty to report.....	1
2.3	What kind of complaints are handled?.....	1
2.4	Different types of complaints.....	2
2.5	Malicious complaints	2
2.6	Complaints not handled	2
3	Work with partners	2
3.1	Handling of complaints relating to partners.....	3
3.2	Joint investigations.....	3
3.3	Handling of complaints within consortium.....	3
4	Make a complaint?	3
4.1	When?	3
4.2	How?	3
4.3	What information is needed?	4
4.4	Protection of the complainant	4
4.5	Confidentiality and non-disclosure	4
5	Responsibilities and mandate CRM Focal point and CRM committee.....	5
5.1	Members of the CRM committee.....	5
6	Procedure for handling complaints.....	6
6.1	Confirmation that complaint has been received.....	6
6.2	Non-sensitive complaints, feedback and deviations	6
6.3	Sensitive complaints	6
6.4	The investigation process.....	6
6.5	Results of the investigation.....	6
6.6	Review of decision.....	6
6.7	Protection for involved parties.....	6
7	Disciplinary measures	7
8	Follow up and lessons learned.....	7
9	Keywords and definitions.....	8
	Annex 1. Template for submitting a complaint.....	10

1 Introduction

Act Church of Sweden (from now on Act CoS) is the Church of Sweden's International humanitarian and development work. Within the Central Office, it is the International Department that is responsible for the work and administration of Act CoS. This Complaints and Response Mechanism (CRM) handbook is part of Act Church of Sweden's commitment to the [Quality and Accountability Framework](#).

Act CoS wants to ensure high quality and good results in its work. Therefore, we are committed to promote changes in unequal structures, ensuring that rights holders are informed, know their rights, are treated with respect and can complain if we do not fulfil with our commitments. The purpose of this handbook is to describe how Act CoS's CRM is designed and how the handling process is carried out.

Since Act CoS is a member of the ACT Alliance, the handbook is also harmonised with [the ACT Alliance Code of Conduct policy and the ACT Alliance Complaints policy](#). The handbook also relates to the Code of Conduct (CoC) for Act Church of Sweden, anti-corruption policy for the Church of Sweden at the national level and the Central Office's work environment policy.

The Director of Act CoS is responsible, with the support of the Senior Management Team of Act CoS for the content of the handbook and ensures implementation of the handbook. Act CoS's CRM Focal point is responsible for ensuring that every complaint is managed, handled and documented in accordance with this handbook. The handbook and its annexes will be reviewed on a regular basis. The CRM Focal point makes an initial assessment of all received complaints based on the instructions in the CRM handbook.

2 Scope and limitations of Act Church of Sweden's CRM

This CRM applies to the work carried out by Act CoS or with support from Act Church of Sweden, which are normally regulated by agreements with partners. The CRM applies to all the signatories of [Act CoS's Code of Conduct](#).

2.1 Who can complain?

Anyone who participates in or is affected by actions that Act CoS carries out by itself or together with a partner can complain. This definition includes actions that Act CoS finances or performs jointly with dioceses and parishes within Church of Sweden.

2.2 Duty to report

All signatories of the Act Church of Sweden's Code of Conduct are obliged to report any knowledge of suspicion of or concern about violations of the same. In addition, all employees working within Act CoS are obliged to report any knowledge of suspicion of or concern about Partners non-compliance to the obligations stipulated in agreements regarding corruption and other irregularities, sexual exploitation, abuse and harassment.

2.3 What kind of complaints are handled?

Act CoS handles complaints regarding compliance of commitments defined in the organisation's *Quality and Accountability Framework* and its Code of Conduct. The complaints dealt with include but is not limited to:

- Activities and projects implemented by Act CoS or together with partners, where the implementation does not live up to current standards, principles and commitments.
- Perceived shortcomings in Act CoS's or partner's contractual compliance, e.g. handling commitments within a partner agreement, project agreement, overall cooperation agreement or other agreements.
- Suspicion or testimony of a violation of Act CoS's CoC.

2.4 Different types of complaints

Act CoS distinguishes between *feedback* and *complaints*.

Feedback – positive and negative feedback – is an opinion or information expressed to improve activities or processes. This type of information is welcome and does not require formal investigation but will be considered for the improvement of our work.

Complaints are expressions of a specific dissatisfaction with Act Church of Sweden's commitments or activities, or alternatively a belief that Act CoS has not lived up to what was promised.

The category of complaints can be divided as follows:

Non-sensitive complaints refer to deficiencies in the implementation of Act CoS's commitments, activities and processes.

Sensitive complaints refer to any knowledge of suspicion of or concern about violations of Act Church of Sweden's Code of Conduct. It includes allegations of corruption, abuse of power, sextortion, sexual harassment, abuse and exploitation (SEAH), and exploitation of and failure to protect children. Reports of exploitation and abuse, especially of a sexual nature, and complaints concerning children shall be prioritised. The basic principle is that suspicions of violations of local or Swedish legislation are reported to the police.

2.5 Malicious complaints

A malicious complaint is an accusation made knowingly on false grounds, with the intent of causing harm to someone else and/or for its own interest.

If discovered during an ongoing investigation, that a complaint was deliberately made on false grounds, the investigation shall be terminated immediately, and the accused cleared of all suspicion. Complaints made in good faith that cannot be verified nor substantiated should not be treated as malicious complaints. Malicious complaints made by Act Church of Sweden's employees may lead to disciplinary measures.

2.6 Complaints not handled

If the CRM focal point considers that the complaint falls outside the scope of CRM, the complainant will be informed that the case cannot be handled.

Act CoS does not handle the following types of complaints relating to:

- Actions and activities that are not financed by or have a valid agreement with Act Church of Sweden.
- International projects or collaborations that dioceses or congregations in the Church of Sweden run themselves.
- Complaints from Act Church of Sweden's personnel related to employment conditions, work environment and management issues. These complaints shall be made to the line manager or to the HR department at Central Office.

3 Work with partners

Act CoS continuously works with partners to keep them informed about the obligation to have a Code of conduct and a Complaint handling system.

In agreements between Act CoS and partners, there is a requirement that partners must have a CoC and that complaints are addressed. Act CoS strives for all target groups and rights holders to be informed and understand their rights so that they can complain.

3.1 Handling of complaints relating to partners

Complaints concerning a partner will be forwarded to the partner organisation and handled according to their complaints system. Act CoS will ask for the complainant's consent to this, as the person in some cases may prefer to contact the partner in question him or herself. If the complainant wants to remain anonymous Act CoS can still pursue the case with partners. When Act CoS forwards a complaint, the CRM focal point will follow up on how the complaint is handled by the partner organisation until the case is closed.

3.2 Joint investigations

If a complaint is received by several organizations (usually donor organizations), Act CoS will endeavor to carry out joint investigations with those. Decisions to carry out joint investigations are decided by the CRM committee. When a joint investigation is carried out, all parties involved shall enter into a written agreement regarding the process and how the results of the investigation should be handled

3.3 Handling of complaints within consortium

When Act CoS is part of a consortium, we ensure that the consortium agreement includes how complaints will be handled according to the context where the project will take place.

4 Make a complaint?

4.1 When?

A complaint should be submitted as soon as possible after the problem is discovered. Complaints regarding shortcomings in the implementation of operations should be submitted during ongoing work or no later than one year after the end of the implementation of the relevant project regarding sensitive complaints. Act CoS shall handle all matters as far as possible, and without time limit.

In projects financed by Act Church of Sweden, partners shall, according to the agreement, always inform Act CoS about sensitive complaints received. All personal data shall be anonymised, and information relating to such matters shall be handled confidentially and only sent to Act CoS's CRM. This also applies in cases where partners themselves have a CRM function and investigate, or have already investigated, the complaint.

4.2 How?

On the website of the Church of Sweden [Complaints and suggestions to Act Church of Sweden](#) there is information on how to submit a complaint. Employees working within Act CoS are responsible of sharing information about Act CoS complaint system. Complaints shall be sent to the CRM Focal point at Act CoS according to the options stated below:

- *E-mail:* complaints.internationalwork@svenskakyrkan.se
- *Phone/Whatsapp* +46 703 98 62 86
- *Letter:* Act Church of Sweden Complaints Focal Point, Central Office, SE-751 70 Uppsala, Sweden.
- Personal conversation with the CRM focal point or relevant Director, Regional hubs at Act Church of Sweden.
- Personal conversation with employees at Act Church of Sweden that will forward the information to the CRM focal point or to the relevant Director, Region hubs at Act Church of Sweden.

Information about a dissatisfaction or problems can be received in personal meetings with employees and representatives from Church of Sweden. The complaint shall be forwarded to the CRM focal point or to the relevant Hub-manager as soon as possible.

Act CoS is a member of the ACT Alliance,¹ the Core Humanitarian Standard Alliance² (CHS) and the Lutheran World Federation (LWF).³ Complaints relating to Act CoS can also be submitted to these international organisations.

4.3 What information is needed?

The template for submitting a complaint in Annex 1 provides guidance on what information is required when submitting a complaint. Anyone who wants to file a complaint should leave their contact details so that the CRM focal point at Act CoS can contact the person to get further information or give feedback.

Act CoS also handles complaints coming from an anonymous source. To submit a complaint without revealing the complainant, the complaint can be sent as a letter.

4.4 Protection of the complainant

Act CoS wants to create an environment that enables and encourages all stakeholders to express concerns without risking retaliation or unfair treatment. If the complainant gives his or her consent, in some cases information that identifies the complainant can be handed over to another unit within the international department or to another organisation.

Act CoS and partners cannot hinder anyone, or subject anyone to reprisals, because of a complaint. Retaliation can, for example, be ostracism, dismissal, non-promotion, changed tasks or working hours, no training or unfair treatment. Nevertheless, if the complainant should be exposed to any form of reprisals, harassment or risk losing employment or employment benefits, Act CoS will seek the best possible solution within the framework of applicable laws and regulations.

4.5 Confidentiality and non-disclosure

In the Church order for Church of Sweden there is a ban on disclosing information from CRM about an individual or partner organisation. This prohibition applies if it is not clear that it can be done without harming the organisation, the person or someone close to them. The Church Order defines that cooperating organisations are all those that cooperate with Act Church of Sweden, regardless of a formal contractual relationship or not.

The identity of those involved in an investigation are kept confidential and shared only when necessary and after consent from the person involved. All employees involved in handling and/or investigating a complaint are subject to confidentiality and sign a written oath of confidentiality to this effect. Even those who are involved in a CRM investigation without being employees of the Church of Sweden shall sign a non-disclosure agreement. Refusal to sign means that the person cannot be involved in the investigation.

Exceptions to the prohibition to disclose information are:

- When it is necessary according to national and/or international legislation.

¹ E-mail: complaintsbox@actalliance.org

Website: <https://actalliance.org/complaints>.

² E-mail: complaints@chsalliance.org

Website: <https://www.chsalliance.org/complaints/>.

³ Website: <https://www.lutheranworld.org/complaints-submission-form>

- When it is required to hire a special advisor or assistance is needed in sensitive matters.⁴

5 Responsibilities and mandate CRM Focal point and CRM committee

Act CoS's CRM Focal point receives and ensures that cases are followed up in accordance with Act CoS's CRM handbook. The CRM Focal point prepares and prioritises matters in the CRM committee and is responsible for documentation. The assignment includes reporting annually on CRM to donors, to the management of the Act CoS, the management of the Central Office of Church of Sweden as well as the International Council of Church of Sweden. The CRM committee decides whether payments to partners need to be suspended or resumed.

The CRM Focal point is also responsible to update and reporting to back donors on ongoing CRM cases and the outcome of the investigation.

The CRM Focal point decides who need to receive information about ongoing cases in accordance with this manual. It is particularly important that relevant managers are informed when a preliminary or full investigation shall be carried out.

The CRM Focal point coordinates the CRM committee, which leads and decides on complaints. Sensitive complaints shall always be dealt with in the committee.

Confidentiality/non-disclosure applies to everyone who is informed of or handles complaints. This also applies to managers who are informed about matters without being on the CRM committee.

The CRM committee can take decisions on sensitive complaints when three persons are present and either the Director of Act CoS or the Head of the section for Finance, Management and Operations support participates. The CRM Committee may call on relevant expertise to get further information on a specific case. If relevant expertise is called on, the committee will share minimum and anonymised information.

The CRM committee have mandate to make and implement decisions based on the analysis of complaints and conclusions of an investigation. In some cases, this can override the line managers' previous decisions. To safeguard the interests of the department in the event of such a disagreement between the parties, the Director Act CoS, or the person he or she delegates to, shall have the final say in the matter.

5.1 Members of the CRM committee

Director Act Church of Sweden or whoever he or she appoints.

Head of the section for Partner collaboration

Head of the section for Finance, Management and Operations support

Head of unit for Finance and Internal control

CRM Focal points

⁴ [Church Rules of Procedure 54 Chapter § 15b.](#)

6 Procedure for handling complaints

6.1 Confirmation that complaint has been received

Anyone who has submitted a complaint shall receive a written confirmation that the complaint has been received and how the complaint will be processed within 2 working days.. The CRM Focal point makes an initial assessment of all received complaints based on the instructions in the CRM handbook.

6.2 Non-sensitive complaints, feedback and deviations

Act CoS encourages its employees, partners, target groups and other stakeholders to raise non-sensitive complaints and/or feedback informally as close to the time of the incident as possible. Such complaints should be handled together with the employees concerned and raised at the operational level together with the relevant manager. Non-sensitive complaints and feedback concerning shortcomings in the organisation will be forwarded to the employee(s) managing the concerned project at Act CoS.

6.3 Sensitive complaints

If the case is in scope according to the CRM handbook the CRM Focal point prepares the case for the CRM committee. The committee decides how the complaint shall be handled and whether the matter shall lead to an investigation.

6.4 The investigation process

The investigation is conducted in accordance with the *CHS Alliance's Guidelines for Investigations*. All investigations are followed up as soon as possible, but the time frame for the investigation and submission of the investigation report is determined based on the nature of the case. The complainant should be informed about the expected time limit of the investigation.

6.5 Results of the investigation

The assigned investigator will present the findings and recommendations from the investigation to the CRM committee. The committee will make a decision based on the results of the investigation, taking into account an analysis of the context, conclusions of the investigation and the investigation report.

The CRM Focal point communicates the conclusions of the investigation to the complainant as soon as possible after the investigation is complete and a decision on action has been made in the CRM committee. The complainant will not be informed of the details of the investigation but will be informed of the results.

Complaints concerning Act CoS's staff that are received by CRM will be investigated by the Central Office's HR department, where decisions are made together with the responsible manager. Reports of exploitation and abuse, especially of a sexual nature, and complaints concerning children shall be prioritised. Such complaints are handled in accordance with applicable legislation.

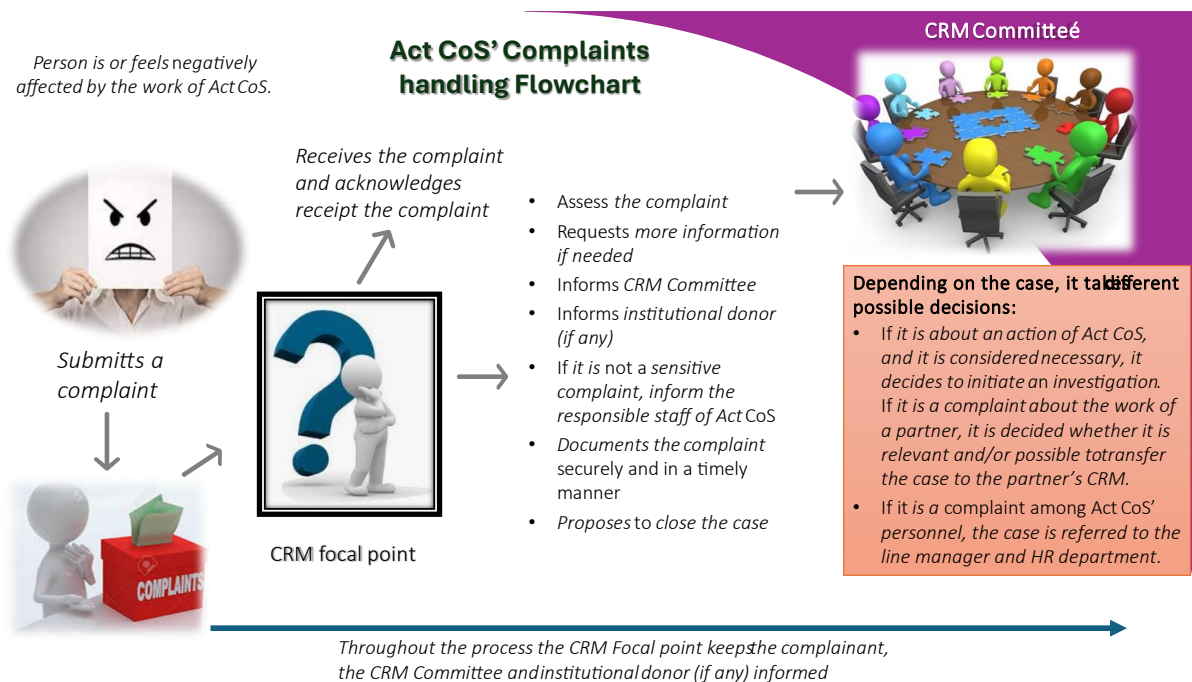
6.6 Review of decision

If the complainant is dissatisfied with the CRM committee's decision, the complainant can send a request for reconsideration of the decision. The CRM committee will assess this request and respond to the complainant. This only happens if new information has come in for the case.

6.7 Protection for involved parties

The purpose of handling matters confidentially is to protect all parties involved, that is informant/complainant, survivors and other victims, witnesses as well as the accused person(s). The CRM Focal point follow up and identifies risks for these individuals before, during and after the

investigation. Act CoS shall be prepared to give the persons involved other support if this is needed in relation to the matter. The CRM committee decides on this.



7 Disciplinary measures

If the investigation shows that a complaint is substantiated, Act CoS can, in accordance with applicable legislation initiate a police report or consider disciplinary sanctions within the framework of the employment or assignments.

If a partner has breached an obligation stipulated in the agreements regarding prevention and reporting of corruption or other irregularities, measures can be taken accordingly. This may involve deferred, reduced or cancelled disbursements, or termination of agreements. Act CoS will enter into dialogue with the partner and follow up on how the organisation handles the matter if it turns out that employees of a partner have violated their code of conduct.

8 Follow up and lessons learned

The annual report for CRM is written by the CRM Focal point and shall contain a compilation of the number and type of complaints, as well as, where applicable, general information about how the case was handled and what lessons the case handling provided. The report is public, but all confidential information, including personal data, is omitted.

The annual report is presented to the management of Act CoS, as well as the International Council and when pertinent to back donors. As part of the learning, Act CoS's staff and partners will have access to the annual report, which is published on the website of the Church of Sweden.

Act CoS shall also document good examples from partners' ways of handling complaints, with the aim of improving their own routines and sharing them with other partners. All confidential information, including personal data, is omitted.

9 Keywords and definitions

ACT Alliance (Action by Churches together) is a global alliance of 140 churches and faith-based organisations working in over 120 countries. Act CoS is a member of the ACT Alliance.

Act Church of Sweden is the official name of The Church of Sweden's work with international Mission and Diaconia. Within the Central Office, the International Department is responsible for Act Church of Sweden.

Children are persons that is under the age of 18.

Complainant is the person who makes a complaint, either on his or her own behalf or on behalf of another person

Confidentiality is keeping information secret and private.

Consortium is a contractually regulated association of independent legal persons who have joined together for a specific and common purpose.

Corruption is the abuse of trust, power, or position for improper gain.

Cooperating organisations are organisations that Act CoS collaborates with within international operations, regardless of whether there is a formal contractual relationship or is based on a conclusive collaboration.

Contractual partners are all sister churches and organisations with which Act CoS establishes agreements on funding and cooperation. In certain contexts, the term partner or partner organisation is also used.

CRM Focal Point is a staff member that receives and ensures that complaints are followed up in accordance with Act Church of Sweden's CRM handbook.

Elected representative is an elected commissioner of a commission or board of Church of Sweden on national level. They are included in the CRM when they have approved and signed the *Code of Conduct (CoC)*. All commissioners have the opportunity to complain about Act Church of Sweden's operations.

Investigation is a systematic process by which information is gathered to prove or disprove a complaint.

Non-disclosure means a limitation in the public's right to see and have access to public documents with the support of the state or intra-church principle of public access to information. If someone requests access to documents related to CRM, Act CoS must assess in each individual case whether the requested document can be disclosed in full or in part (non-disclosure test the document). Act CoS can only refuse to disclose information under certain circumstances specified in the law and church regulations, that is, when there is a reason to refuse disclosure due to non-disclosure. Act Church of Sweden's judgment on the release of documents can be reviewed by the Church of Sweden's Appeal Board, which, with the support of Act Church of Sweden, ultimately has to take a position on questions of this kind.⁵

Protection is an environment created based on human rights, refugee and international humanitarian law, that promotes respect for people, prevents and/or mitigates the immediate effects of a specific pattern of abuse, and restores dignified living conditions through reparation, restitution and rehabilitation.

⁵ [Church Rules of Procedure Chapter 54 § 8a.](#)

Rights holder is a concept that assumes that all people have the right to have their voice heard and considered. The participation of rights holder's rests on a theoretical framework in the Convention on Human Rights and in the Convention on the Rights of the Child.

Sextortion means that a person abuses his or her position of power to gain access to sexual services in exchange for a service or benefit that he or she can grant or withhold by virtue of his or her position.

Signatories are those who have signed the Act CoS Code of Conduct. Those who are representing Act CoS, employees, as well as elected members of the Church Council. Persons appointed to various positions under the Church Council (holders of positions of trust) and other persons who are part of groups/delegations appointed by the Church Council or on delegation from the Church Council. The Code of Conduct also applies to other persons who have signed it.

Survivor is a person who has been subjected to abuse or discrimination.

The Code of Conduct (CoC) describes which rules personnel shall adhere to. An employee of Act Church of Sweden approves and sign two codes of conduct: the Church of Sweden's' and Act Church of Sweden's Code of Conduct. This takes place at the commencement of employment. Other categories or personnel can also be asked to approve and sign Act Church of Sweden's CoC. Among these are e.g. consultants, interns, volunteers, those accompanying seconded staff as well as elected representatives in the Church Board and the International Council. Act CoS requires in agreements that all cooperating partners, with whom they have cooperation agreements, have a code of conduct which they apply for their employees.

Witness is someone who witnessed the events that led to the complaint and submitted evidence in the investigation.

Abbreviations

ACT Alliance – Action by Churches Together Alliance

CHS – Core Humanitarian Standards

CRM – Complaints and Response Mechanism

LWF – Lutheran World Federation

WCC World Council of Churches

SARG – Strategisk Avvikelse-rapporterings-grupp

SEAH – Sexual Exploitation, Abuse and harassment

Annex 1. Template for submitting a complaint

Send to:

E-mail: complaints.internationalwork@svenskakyrkan.se

Postal address: Complaints Focal Point, Act Church of Sweden, Central Office, SE-751 70 Uppsala, Sweden

A: GENERAL INFORMATION

NAME OF THE PERSON OR ORGANISATION FILING THE COMPLAINT:

	ARE YOU 18 YEARS OLD?
E-MAIL	TELEPHONE

B: DESCRIPTION OF THE COMPLAINT/PROBLEM

NAME OF THE PERSON, ORGANISATION AND/OR PROJECT THAT THE COMPLAINT RELATES TO

TIME OF THE INCIDENT/PROBLEM

LOCATION OF THE INCIDENT/PROBLEM

BRIEF DESCRIPTION OF THE INCIDENT/PROBLEM

C: DESCRIBE THE MEASURES THAT HAVE BEEN TAKEN

Include information about whether this complaint has been submitted to other organisations and whether any measures have been taken, about medical help and/or psychosocial support, as well as whether the police have been informed.

BRIEF DESCRIPTION OF THE MEASURES TAKEN

D: NEED FOR REFERRAL TO THIRD PARTY

State whether you believe there is a need for referral to a third party, for example, some form of medical, psychosocial or legal support for the people involved:

BRIEF DESCRIPTION

Date: _____ Name: _____

In connection with the filing of this complaint to the Church of Sweden, we will process your personal data. The faith community of the Church of Sweden (org.nr 252002–6135) is the controller of the personal data for the processing of personal data within the framework of Act Church of Sweden's CRM (Complaint Response Mechanism), which this complaint is part of. The legal basis for this processing of personal data is legitimate interest, agreement or legal obligation.

Your privacy is important to us; therefore, we put security in focus. We take measures to protect your data in accordance with the General Data Protection Regulation (GDPR) and established governing documents for information security. This means that we protect your data with both technical solutions and organisational routines and rules, for example, authorisation control adapted to the nature of personal data processing is applied.

The faith community of the Church of Sweden saves your personal data only as long as it is necessary to fulfil the purposes of the processing, or as long as we have to store it by law. Your data is then deleted or de-identified in a secure manner, so that it can no longer be linked to you.

If, after reporting, you want to have your personal data deleted, contact complaints.internationalwork@svenskakyrkan.se.

If you have questions about how we process your personal data, you can contact the Central Office's data protection officer before and after submitting a complaint at: kyrkokansliet.dataskyddsbud@svenskakyrkan.se.

If you think that we are processing personal data about you in a way that violates the data protection regulation (GDPR), you can submit a complaint to the Swedish Data Protection Authority (IMY) via this link: <https://www.imy.se/privatperson/utfora-arenden/lamna-ett-klagomal/>.