



Feedback and Complaint Policy

1. Purpose

Justice Rapid Response (JRR) strives to conduct its operations with honesty and integrity. To help JRR fulfill that commitment, this policy describes the procedure to provide feedback and report concerns and situations that are falling short of what could be expected from the organization or from the individuals implementing its activities.

In this framework, JRR is putting a particular emphasis on the prohibition and prevention of any violations of the personal integrity of its staff, consultants and of all the persons they interact with in the course of their work, or other unwanted behaviour. Harassment, exploitation and abuse (including of a sexual nature) and discrimination based on gender, origin, ethnicity, religion, age, sexual orientation, disability etc., will not be tolerated, nor will they be ignored.

2. Scope

This policy is intended for anyone who is or has been engaged with JRR as an organization and wishes either to provide constructive feedback or file a complaint with the organization, either directly or through JRR's whistleblowing mechanism.

Feedback can be provided with regards to situations where it is considered that JRR's overall performance could be improved.

You are encouraged to file a complaint – in good faith - to report unwanted behavior such as discrimination, harassment, exploitation and abuse (including of a sexual nature), but also fraud, financial mismanagement, bribery, theft, corruption, breach of security rules etc.

When in doubt, whether certain behavior is inappropriate, feel free to contact the Director of Operations at JRR (see below).

3. Submitting feedback or a complaint

3.1 Feedback or a complaint submitted directly to JRR

Feedback and a complaint can be made in person, by telephone, letter or email marked "**CONFIDENTIAL**" to the **Director of Operations**:

Director of Operations
Justice Rapid Response
Rue Dr-Alfred-Vincent 10
1201 Geneva, Switzerland
Tel: +41 22 544 29 00
Email: dirop@justicerapidresponse.org

In the case of a complaint, in addition to stating its nature and circumstances, the Complainant may also state the remedial action they wish to be taken.

If the complaint is about the Director of Operations, the complaint should instead be addressed directly to the **Executive Director** – the correspondence must be marked “**CONFIDENTIAL**”.

Executive Director
Justice Rapid Response
Rue Dr-Alfred-Vincent 10
1201 Geneva, Switzerland
Tel: +41 22 544 29 00
Email: ed@justicerapidresponse.org

3.2 Complaint submitted through JRR’s whistleblowing mechanism

Complainants can also report a concern through JRR’s independent and secure whistleblowing mechanism called “AAB”¹. The procedure and explanations on how to do so is included in Annex 1, together with a “Service Guide” briefing note.

Concerns raised through JRR’s whistleblowing mechanism will be passed on to JRR’s leadership (Director of Operations and Executive Director) for initial assessment and investigation if required.² However, the personal details of the Complainant (name and contact information) will not be shared by AAB without the consent of the Complainant. Concerns can also be raised anonymously to AAB.

4. Action from JRR

4.1. Initial Assessment

Upon receiving the complaint either directly or through JRR’s whistleblowing mechanism, the Director of Operations (or the Executive Director in case the Director of Operations is implicated or out of office) will carry out an initial assessment to determine the scope of the issue and take urgent measures if necessary (if for instance the physical integrity of the Complainant or another party is at risk) in a consistent manner with a victim-centered approach (i.e. prioritizing the complainant’s safety, dignity, choices, and well-being at every stage, while minimizing harm).

The Director of Operations (or the Executive Director) will provide written confirmation that details of the concerns have been received, either directly or through AAB. At this stage, information will be provided as to:

- Whether or not further information is required from the Complainant directly or through AAB if the Complainant has remained anonymous.
- How JRR proposes to deal with the matter;
- Whether any initial inquiries have been made; and
- Whether further investigations will take place and, if not, why not.

JRR is committed to deal with any concern in a fair and appropriate manner.

¹ JRR has partnered with a third party (Anderson, Anderson & Brown LLP), which provides a whistleblowing mechanism called “AAB”. See Annex 1 for the details.

² The third party providing the whistleblowing mechanism has received clear instructions to report to an alternative leader within the organization, should one of the leaders be the subject of the concerns raised through the mechanism.

4.2 Investigation

If the case requires further action, the Director of Operations will consult the Executive Director to decide whether an investigation is needed. An investigation is for example needed when relevant information is incomplete and/or a reasonable suspicion of gross misconduct or serious policy breaches.

If the complaint is in relation to the Executive Director, the Director of Operations will inform the Chair of the Executive Board who will decide on appropriate further action.

If an investigation is required, the Director of Operations will use an independent and impartial entity to carry out the investigation.

Particular attention will be paid to the due process rights of the persons involved and to confidentiality in the treatment of the information.

Should any legal constraints (such as other investigations ongoing with the same subject of complaint; a need to await certain phases of investigation before communicating; etc.) prevent JRR from giving specific details of the investigation or specifics about the disciplinary actions, JRR will endeavor to communicate as much as possible with a view to its commitment to a victim-centered approach.

If the allegation is substantiated the necessary measures will be taken within a reasonable time.

4.3 Referral and appeal

4.3.1 Referral to the Executive Director about the initial assessment and complaint handling

If a Complainant is not satisfied with the outcome of the Initial Assessment and the complaint handling by the Director of Operations, this can be raised with the Executive Director of JRR:

Executive Director
Justice Rapid Response
Rue Dr-Alfred-Vincent 10
1201 Geneva, Switzerland
Tel: +41 22 544 29 00
Email: ed@justicerapidresponse.org

4.3.2 Appeal to JRR's Executive Board about the outcome and complaint resolution

Should the Complainant not be satisfied with the outcome of the investigation and the complaint resolution, or the complaint is in relation to the Executive Director, they will have the right to put the case in writing to a panel consisting of two members of JRR's Executive Board. The case must be lodged 14 days from the date of the final response to the Complainant. The Executive Director or the Director of Operations will provide the contact details of the Chair and Vice-Chair of JRR's Executive Board upon request.

If the case is found to be justified, the panel will make a decision, including if necessary, the provision of instructions to JRR's Executive Director for further actions, as well as remedial actions. The decision of the panel is final.

4.4 False and malicious allegations

If it is concluded that a Complainant has made false allegations maliciously or with a view to personal gain, the Complainant, if a member of staff or otherwise in a contractual relationship with JRR, will be subject to disciplinary action or other appropriate action.

5. Reporting and update

The Director of Operations (or the Executive Director) will keep JRR's Executive Board informed of the number and nature of complaints, and the outcomes, on at least an annual basis without disclosing sensitive information and/or personal data without the consent of the people concerned.

The Director of Operations will regularly review the effectiveness of this Policy and of JRR's whistleblowing mechanism.

Annex 1: AAB Whistleblowing mechanism



SHINE A LIGHT ON WRONGDOING IN THE WORKPLACE.

If something in your workplace doesn't look right to you
– or you hear something that causes concern, let us know.

You can contact us anonymously on our helpline.

Just call:

Ireland - 1800 901 631

Nambia - 00264 833 800 109

Switzerland - 0800 830 235

USA - 1855 290 6405

Rest of the world - +44 1224 379303

and speak to us in total confidence.

If you don't want to call, you can also report
what you've seen or heard via our website at
<https://fileaconcern.org/JRR>.

We are an independent external service
available 24/7, 365 days a year.

AAB.UK

AAB