

Objective

This policy outlines TIB's procedure for handling complaints received concerning its operations, programmes, staff conduct, or any matter related to its mission of promoting transparency and fighting corruption. It aims to ensure fairness, transparency, accountability, and protection of complainants' rights. This policy is based on Transparency International's global best practices and adapts them to the specific context of TIB.

Scope

This policy applies to all complaints received from individuals, organizations, or entities, regardless of their relationship to TIB (members, partners, beneficiaries of TIB programs, the general public, etc.).

Definition of a Complaint

A complaint is any expression of concern or dissatisfaction regarding TIB's actions, activities or missions, as well as behaviour of its officers. This includes allegations of wrongdoing, misconduct, or non-compliance with its policies or ethical standards.

Submission of Complaints

Complaints may be submitted via:

Email: [\[complaints@transparencybelgium.be\]](mailto:complaints@transparencybelgium.be) (preferred method)

Postal Mail: Transparency International Belgium, University Foundation, Rue d'Egmont 11, 1000
Bruxelles

Acknowledgment and Initial Assessment

TIB will acknowledge receipt of a complaint as soon as possible. The complaint will be initially assessed to determine if it falls within TIB's scope. Complaints outside of TIB's scope will be acknowledged and referred to the appropriate authority, if possible, with the complainant's consent.

Investigation

For complaints within TIB's scope:

- A designated Complaints Officer (or team) will conduct a thorough, impartial, and timely investigation.
- Complainants will be kept informed of the progress of the investigation. The timeframe will depend on the complexity of the complaint, but efforts will be made to complete investigations within a reasonable timeframe (e.g., 30 working days). Any delays will be communicated promptly.

- The investigation may include reviewing relevant documents, interviewing witnesses, and gathering additional information. Confidentiality will be maintained to the extent possible, with appropriate balance to the need for a thorough investigation.

Resolution and Response

- Following the investigation, the Complaints Officer will prepare a written report summarizing the findings and proposed resolution.
- A written response will be provided to the complainant within 10 working days of the completion of the investigation.
- Appropriate remedial action will be taken, if warranted by the findings. This may include policy changes, disciplinary action, or other corrective measures.

Appeals

Complainants may appeal a decision within 10 working days of receiving the response. The appeal will be reviewed by an independent appeals panel, whose decision will be final.

Confidentiality and Data Protection

TIB will treat all complaints and related information confidentially and in accordance with all applicable data protection laws and regulations.

Monitoring and Review

TIB will regularly review and update this complaint-handling policy to ensure its effectiveness and compliance with best practices. Data on complaints received, their nature, and the outcomes will be collected and analyzed to identify areas for improvement.

Resources

Adequate resources (human, financial, and technological) will be allocated to ensure the effective and efficient functioning of this complaint-handling process.

This internal TI Belgium Complaint Procedure is complementary to any reporting to an independent competent authority and does not stand in the way nor is it intended to prevent or discourage any victim or witness to seize an independent competent authority and to report such incident.