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Integrity complaints procedure VVSG-International

1. Chapter 1. Introductory provisions

Article 1. Purpose

The complaints handling procedure aims to ensure adequate and timely handling of complaints and reports related to integrity violations. This procedure serves as a guide and guideline for handling complaints. However, integrity violations and the possible handling of complaints can be very sensitive and complex, so this procedure should not stand in the way of a flexible and tailor-made approach.

Article 2. Regulations and roles

This procedure in no way replaces obligations arising from regulations or internal documents such as the integrity policy of VVSG-International and the working regulations of the VVSG. The procedure for handling complaints is complementary to and does not affect other established procedures and vice versa.

Article 3. Scope of application

This procedure applies to complaints or reports regarding integrity violations committed by employees or directors of VVSG-International. Complaints or reports relating to integrity violations committed by employees of a local government - who are not employed by the VVSG but may be involved in the implementation of VVSG's programmes on municipal international cooperation - are passed on to the appropriate persons within the municipality concerned. Depending on the situation, VVSG-International's complaints manager may well be able to assist with investigation and/or communication.

Integrity violation means any violation of appropriate financial or moral behaviour according to the integrity policy or other internal regulations.

Anyone can file a complaint or report. This can be a staff member of VVSG-International, but equally a partner or beneficiary in the implementation of programmes (e.g. staff members of Flemish and foreign local governments, provinces, partner NGOs and foreign umbrella associations of local governments).

Upon receipt of the complaint, an acknowledgement of receipt will be sent to the complainant.

Article 4. Other reporting channels

Before a formal report or complaint is submitted, an informal report is possible. A reporter can at any time confidentially discuss his/her suspicion of a violation with an employee, manager, the programme manager of VVSG's programme on municipal international

cooperation or the integrity adviser¹. If necessary, they can inform and guide the reporter through the formal reporting procedure.

Reports may also arise from internal controls such as financial audits and audits. In such cases, no submission should be made through the [hotline on the VVSG website](#) and, if necessary, the complaints manager will initiate a (preliminary) investigation.

Reports of sexual exploitation, sexual abuse and sexual harassment can also be submitted to the [Central Disclosure Office for reports of abuse in development cooperation](#). Although the Central Reporting Point is only competent for this type of reports and can only be called upon if the reporting point of the organisation concerned has already been contacted / the organisation concerned has not followed up a report / there is a conflict of interest within the reporting point of the organisation concerned.

2. Chapter 2. Preliminary investigation

Article 5. Purpose of preliminary examination

The purpose of the preliminary investigation is to determine whether a report should be investigated. During the preliminary investigation, the complaints manager will assess the admissibility of the complaint and make an initial assessment of the authenticity of the alleged facts and examine their provability.

Article 6. Conditions of admissibility

A complaint or notification is admissible if:

1. It is a complaint relating to a potential integrity violation as defined in Article 3(1).
2. The complaint was submitted via the [complaint form on the VVSG website](#). The following fields are required to be filled in there: e-mail address of the reporter ; organisation within which the reporter works; the nature of the reporter's relationship with VVSG-International; the reason why the reporter is contacting; the subject of the complaint (selection menu); a description of the persons and parties involved; the date of the facts; a description of the complaint.
3. The complaint was not filed anonymously;
4. It is not a complaint about a violation that has been previously reported and to which adequate action has been taken.

Admissibility is assessed by the complaints manager. No appeal is possible against the admissibility decision. The reporter is free to submit a new complaint or report for the purpose of obtaining admissibility.

Article 7. Outcome and report of preliminary examination

The complaints manager will prepare a report of the preliminary investigation and deliver it to the reporter within two weeks.

¹ See contact details at the bottom of this document.

If the preliminary investigation reveals a potentially high-risk situation requiring high urgency, this is mentioned in the report and priority is given to the case. If it appears that the reporter needs immediate medical or psychosocial assistance, the complaints manager appeals to the contact persons of VVSG's prevention advisor (for cases in Flanders) or contacts the country manager within team International for the partner country in question, who in turn appeals to VVSG-International's local network.

The preliminary investigation report includes the admissibility assessment and an initial assessment regarding the authenticity and provability of the alleged facts. If, based on this information, a complaint investigation arises, the complaints manager makes a proposal of investigation which is included in the preliminary investigation report. Additional information may be requested from the complainant if necessary. In the case of a false complaint, only after hearing the reporter will the need for sanctions be considered.

If the complaint concerns sexual exploitation, sexual abuse or sexual harassment, there are four specific obligations². 1) In any case, the VVSG takes appropriate measures in a timely manner immediately after analysing the report. 2) The VVSG provides appropriate assistance to victims. 3) If necessary, the VVSG provides appropriate assistance to other persons who report abuse. This includes measures to protect reporters and to protect victims from possible retaliation. 4) The VVSG has an obligation to inform victims of available assistance. It shall provide assistance only if requested by the victim.

If, on the basis of the preliminary investigation report, there is no reason to launch an investigation, the reporter is informed of this with a brief motivation.

3. Chapter 3. Research

Article 8. Complaint investigation

An investigation may be launched if the result of the preliminary investigation requires it. This decision is taken by the complaints manager, possibly in consultation with the HR department, general management, a psychologist or external consultant.

Based on the facts and data of 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 to the maximum extent and persons involved are only given information on a need-to-know basis. This approach is used throughout the investigation and in all investigative acts. The guidelines included in the brochures on integrity and complaints handling designed by Deloitte and DGD serve as a guide during the investigation.

Each investigation requires an individual approach and there will always be flexibility with the facts and data specific to the investigation. All investigative actions and steps taken will be documented in the file, which will also include background information, documents received and conclusions. The investigation file also contains data concerning the investigator(s) and the parties contacted and involved, anonymously or not.

Article 9. Principles and safeguards

² See [Royal Decree 18/4/2023](#).

A number of principles deserve special attention and should always be respected during the course of the investigation. These include confidentiality of information, proportionality, treatment within reasonable time, absence of bias and protection of the parties involved. The facts, sensitivity, risk and complexity of the complaint are always tested against these principles when taking investigative action. Deviations from respecting these safeguards, applied for example to keeping the identities of the reporter, victim and perpetrator confidential, can only be made with the express consent of the parties involved or when required by law (e.g. in the case of a judicial investigation).

4. Chapter 4. Handling and follow-up

Article 10. Outcome of investigation and imposition of measures

If the investigation shows that possible criminal offences were committed, advice may be sought from an internal or external expert after which judicial authorities will be informed if necessary.

If it appears that an integrity violation has been committed, appropriate action will be taken against the perpetrator. The appropriate sanction obviously depends on the case and can vary widely from a reprimand or warning to immediate dismissal with formal referral to criminal authorities. The determination of the sanction is made by the general management, possibly after internal or external advice.

Besides sanctions, alternative solutions such as mediation or amicable settlement may also be proposed. This is determined by the complaints manager, in consultation with the general manager of the VVSG or of the municipality concerned, if any.

If the investigation shows that no integrity violation was committed, no measure will be imposed.

Article 11. Completion of investigation.

Each research is recorded upon completion, maintained in the VVSG archives and the research file is kept for a period of five years.

The outcome of the complaint investigation shall be communicated to the reporter and, if applicable, the victim of the violation. Reasonable time must be respected for this purpose.

Adequate attention is paid to the victim of the report when dealing with it. The exact form of follow-up towards the victim depends on the facts, circumstances and the outcome of the investigation. In any case, the complaints manager keeps a finger on the pulse after the complaints procedure has been completed.





Article 12. Communication, privacy and transparency

Fair complaint handling with respect for the protection of victim, reporter and perpetrator always takes precedence over communication interests and considerations. This means, among other things, that information around a specific complaint or investigation is only communicated to actors who are or need to be directly involved. Communication around specific cases requires accurate moral considerations on a case-by-case basis.

If interested parties other than the reporter or victim in a publicity-sensitive matter are also at risk of any form of harm, they will be informed of the situation. Information and communication

to these stakeholders concerns only what is strictly necessary and only on condition that they too guarantee principles such as confidentiality. The appropriateness, timing, tone and content of other external communications are always reviewed according to the circumstances of the specific situation. Such communications always take into account trade-offs between the interest and rights of the victim, the offender, the public, the industry and possible other stakeholders.

Annually, VVSG-International reports on complaints handled to the Executive Board and in (publicly available) annual report sheets on its website. In light of the protection of reporter, victim and perpetrator or other stakeholders, this reporting does not include any sensitive or case-specific data. Based on this annual reporting and analysis of reports, complaints and integrity violations, this complaints procedure can be updated to improve the quality of complaints handling.

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