

IOGT·NTO·MOVEMENT

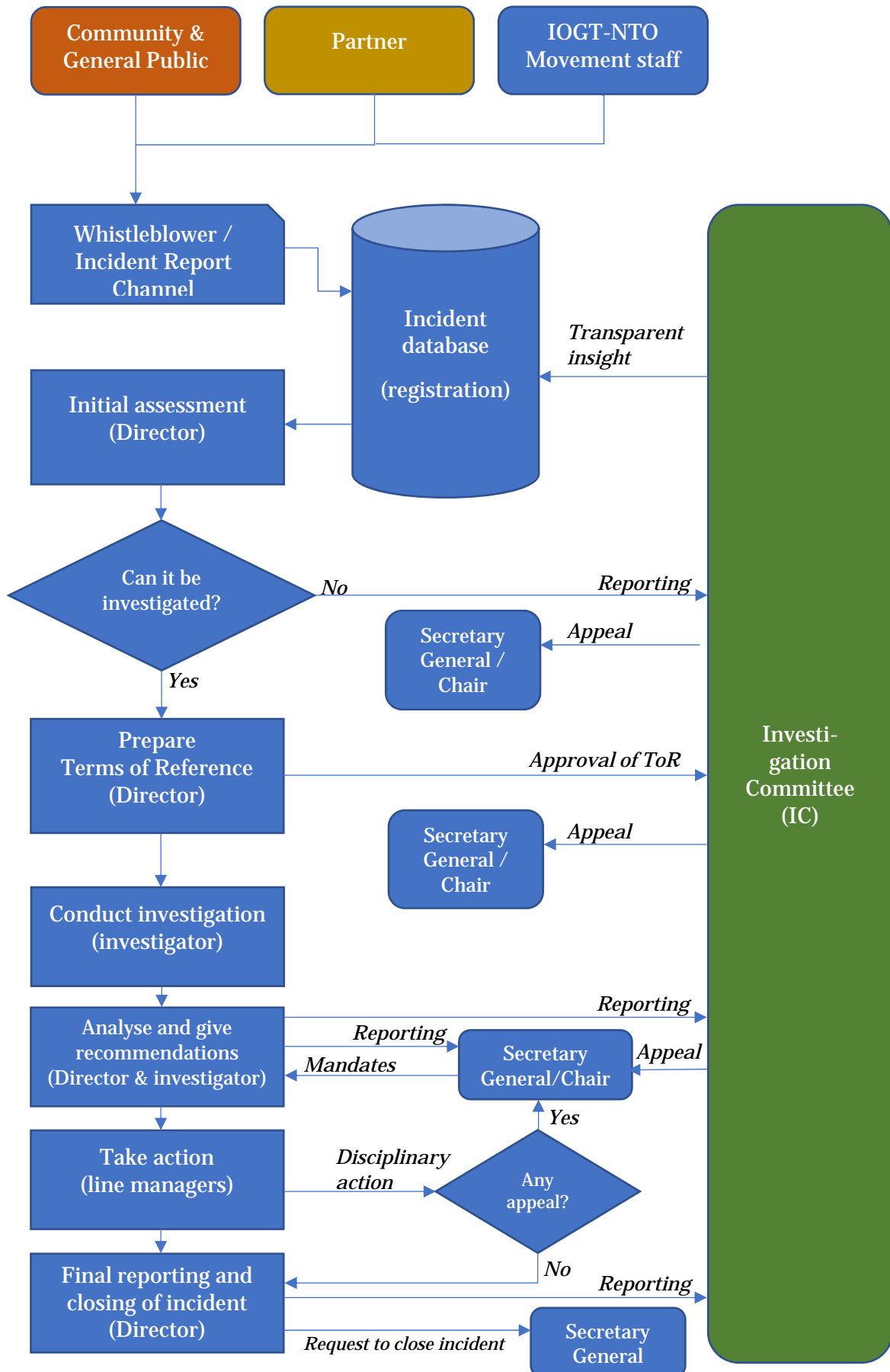
Incident Response Mechanism Manual

Roles, Responsibilities and Processes in case of whistleblowing, complaints and other incidents

Adopted by
IOGT-NTO Movement board

March 17, 2020.

Flowchart over the Incident Response Mechanism



Innehåll

- 1 Definitions and mandate 4
 - 1.1 Security and confidentiality 4
 - 1.2 Definition of incident 4
 - 1.3 Mandate for incident responses 5
- 2 Responsibilities 6
 - 2.1 Accountability framework. owners and stakeholders 6
 - 2.2 The Investigation Committee (IC) 7
 - 2.3 The role of the International Director 7
 - 2.4 The Secretary General’s Secretariat (“staben”) 7
 - 2.5 The Secretary General and Chair of board 7
 - 2.6 Responsibilities of IOGT-NTO Movement staff 7
 - 2.6.1 International and Regional Directors (RDs) 8
 - 2.6.2 Documentation 8
- 3 Managing incidents 9
 - 3.1 Receiving complaints and incident reports 9
 - 3.2 Investigation process for serious incidents 12
- 4. Decision on result from investigation 13
- 5. Information and Action 13
- 5. The right to appeal 14
- 6. Closing of incident 14
- 7. Developing capacity on managing incidents in IOGT-NTO Movement 14
 - 7.1 Information responsibilities 14
 - 7.2 Annual report on incidents, incident investigation and preventive incident measures . 15
- 8. Maintenance of the Incident Response Mechanism 15
- 9. Annexes to this manual 15

1 Definitions and mandate

This manual must be used to receive and record all incidents reported through the whistle-blower channel. Incidents that can be registered must relate to IOGT-NTO Movement accountabilities towards communities, partners, staff, donors, and the general public.

It describes the Incident Report Mechanism (IRM) used at IOGT-NTO Movement (hereafter only called IOGT-NTO Movement).

Management of incidents should be rules-based and adhere to certain standards. The rules in organisations are defined through its policies and guidelines and national legislation. All policies of IOGT-NTO Movement should therefore have a reference to the whistle-blower channel where policy breaches can be addressed.

From this follows that if there are no specified rules it may be difficult to take appropriate action on a complaint or grievance. It should however be remembered that policies are tested and improved through this mechanism so even if it is unclear whether a policy or law has been breached or not, a complaint or external incident should be filed if there is a perceived need for it.

The whistle-blower channel can be found on the website www.iogtntororelsen.se/whistleblower/ or if there is no access to the website, a rapporteur may use the email whistleblower@iogt.se.

Note that this manual does not define or limit what kind of incidents that can be reported through the whistle-blower mechanism. Examples of incidents are however mentioned (see Section 1.2), and should be understood just as examples.

1.1 Security and confidentiality

The purpose of having a detailed manual for managing whistleblowing is to ensure that both the whistle-blower and any alleged perpetrator will be protected from repressive actions from any party, internal or external.

When a whistle-blower or rapporteur files an incident report they are guaranteed that the complaint, the involved, its nature and its content are kept confidential until a resolution is found.

If anyone that gets involved in the investigation breaches this confidentiality, it should be reported as a new incident and investigated. During the investigation, there may be a need to question people outside the organisation. It is important then to not disclose any sensitive personal information.

1.2 Definition of incident

An incident can be of any kind that is a breach against fundamental values as well as disturbs and is a risk for the operations of IOGT-NTO Movement. It can be corruption, harassment, threats and violence, administrative and programmatic mismanagement, natural disaster, discrimination, tribalism and favouritism to a degree that it may cause damage to the trust, expected results, financial loss, reputation, and staff or partner safety and security.

Incidents can thus be of two kinds:

- 1) *complaints* are normally a result of (perceived) breaches against Code of Conduct and the policies of IOGT-NTO Movement. If a policy is breached the whistle-blower channel is used to report on the breach. Complaints can be filed by anyone, inside or outside IOGT-NTO Movement.

- 2) *external incidents* are sudden events outside the control of IOGT-NTO Movement that affects individual staff of IOGT-NTO Movement (such as natural disasters or robbery during work) and the operations of IOGT-NTO Movement and its partners.

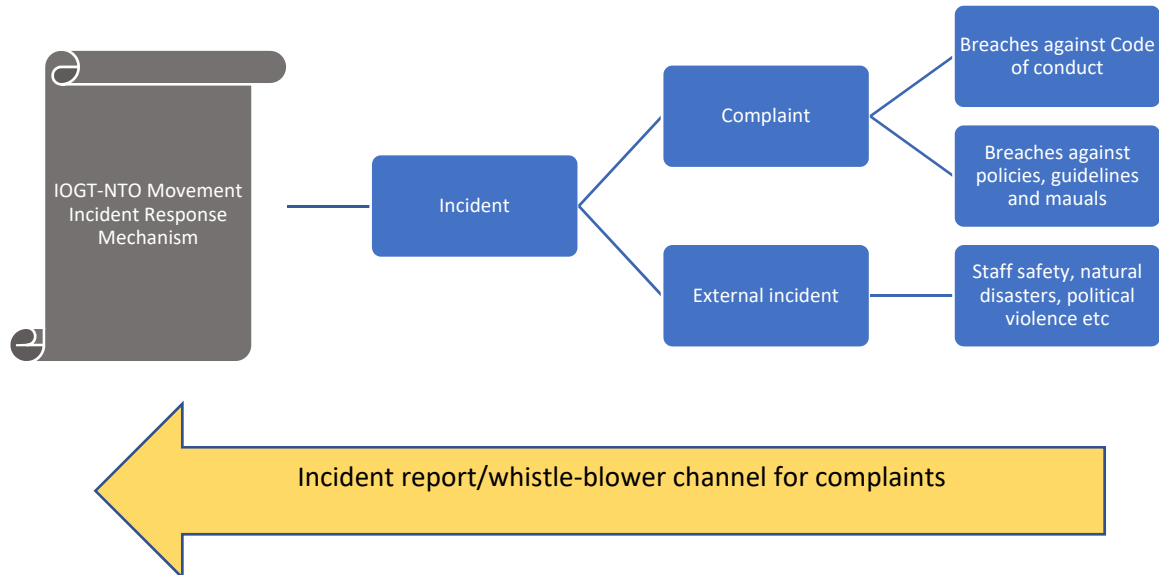


Fig 2 The definition of complaints and external incidents. Both are managed by the IRM.

1.3 Mandate for incident responses

IOGT-NTO Movement can only take formal measures against individual staff members within its own organisation and within the mandates of its own policies.

Incidents that happen outside IOGT-NTO Movement premises and immediate area of responsibility and not directly concerning IOGT-NTO Movement staff can be managed by:

- 1) requesting improvements in policy or compliance, or stop or reduce funding to IOGT-NTO Movement partners, or close the cooperation;
- 2) take legal action by submitting complaints to law enforcement if IOGT-NTO Movement is directly affected by illegal or criminal actions by others;
- 3) take legal action by filing a civil case complaint to relevant court.

However, the above does not mean that the incident response may not include investigation of partners' and other stakeholders' actions. IOGT-NTO Movement is obliged to investigate wrongdoings and if possible recover any losses.

2 Responsibilities

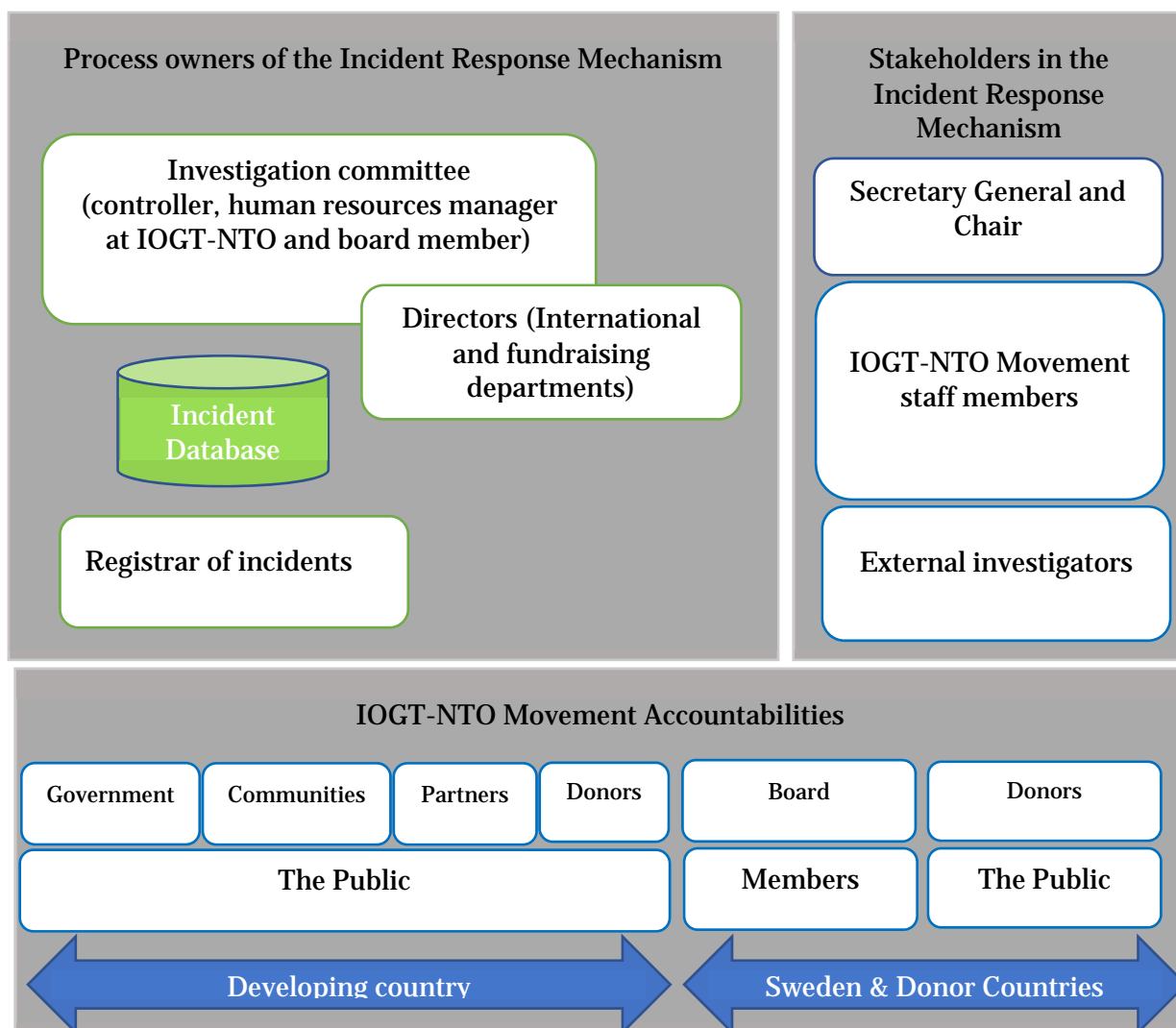


Fig 3. The upper part of the illustration shows who are involved as operational process owners of the IRM and who are involved as stakeholders. The lower part illustrates the accountabilities IOGT-NTO movement operates under.

2.1 Accountability framework. owners and stakeholders

IOGT-NTO Movement is accountable to a number of actors that may be individuals, groups, organisations or institutions. Those actors may be located in Sweden, in the countries where we work or elsewhere where we may any kind of formal relation.

Each of those actors expect that IOGT-NTO Movement is prepared to be held accountable for its actions. Hence the need for an incident reporting mechanism, where issues can be addressed and managed in a structured, institutionalised way.

IOGT-NTO Movement’s incident reporting mechanism (IRM) is operationally led by the Investigation Committee, the relevant department Director¹ and the Registrar. Other stakeholders in the IRM that needs to be aware and take actions in relation to the IRM are

¹ There are two Sweden-based department Directors in the IOGT-NTO Movement. One is the Fundraising Director and the other is the Director for the International Department. In this manual, when it says *relevant Director or Sweden-based directors or Directors* it refers to any of those two. The International Director in turn are supervising two Regional Directors abroad.

the Secretary General and Chair of board, the staff of IOGT-NTO Movement and occasionally external investigators.

2.2 The Investigation Committee (IC)

The Investigation Committee consists of 3 persons.

The board decides of a Financial Controller of any organisation that is a member of IOGT-NTO Movement and one member of the board of the IOGT-NTO Movement. A standing member in the IC is the Human Resource Manager of IOGT-NTO².

The relevant Director that is responsible for the case is the rapporteur to the Investigation Committee.

In case there may be a conflict of interest in the group, or other specific reasons, a representative from an independent auditor may be assigned as a replacement or addition to the Investigation Committee. Any member of the Investigation Committee may request this to the Secretary General or Chair who make the decision on her/his own discretion.

The purpose of the Investigation Committee is to ensure transparency and a basic level of collective oversight while maintaining existing accountabilities and the protection of involved parties when managing and investigating incidents. Members are not allowed to talk about the case outside of the group, except as defined in this manual.

2.3 The role of the department Directors

The Director is reporting the work in detail in specific cases to the Investigation Committee. The Director is also keeping the Secretary General informed on the overall situation and resolutions when cases are closed. In serious cases, the Secretary General may be given detailed information in order to take other actions beyond the mandate of the Director.

2.4 The Secretary General's Secretariat ("staben")

The Secretary General's Secretariat ("staben") at IOGT-NTO is responsible for registering all incidents. The assigned member of the Secretariat, hereafter called the Incident Registrar, check the incident reporting channel whistleblower@iogt.se or website <https://www.iogtntororelsen.se/whistleblower/>, and register the incident into the incident database. Apart from the Incident Registrar, the database can only be accessed by the Investigation Committee members.

2.5 The Secretary General and Chair of board

The Secretary General (SG) is normally not involved in any investigation or any details of it. This ensures there is an internal superior appeal instance for both Investigation Committee members, whistle-blowers and those investigated. The Secretary General reports directly to the Chair of board. Appeals may also be filed directly to the Chair of board and the Chair of board will consult with the SG how to proceed.

It is the SG who also gives the mandate to take corrective action to the Directors and safeguarding that the actions are balanced and fair and in the best interest of IOGT-NTO Movement.

2.6 Responsibilities of IOGT-NTO Movement staff

The concept of *zero-tolerance* means that every *staff* member is responsible for reporting incidents of suspected corruption, harassment, accidents, threats or other irregularities to

² Staff in IOGT-NTO Movement is formally employed by IOGT-NTO.

either a superior or directly through any of the IOGT-NTO Movement incident reporting channels. Failure to do so may lead to disciplinary action.

Sound judgement is needed before filing an incident; incidents of minor art may be reported through regular reporting channels in the line organisation. However, all cases of suspected corruption, harassment, violence and serious accidents during work should be reported without exception. The staff member should not under any circumstances do any investigations on her/his own. This may jeopardize the quality of the later formal investigation.

2.6.1 Swedish and Regional Directors (RDs)

Responsibilities in the investigation process

RDs are normally responsible for the follow-up of incident reports in their respective area of operation. Incidents outside those areas are investigated under the supervision of the relevant Sweden-based Director.

In the International department, when an incident is reported through the whistle-blower channel, the Director will after an initial assessment, assign the relevant RD to do the investigation unless the RD is a party in the reported incident and may have a *conflict of interest*. The RD initiates and secures due process and documentation of the incident, and information to all parties involved. The RD will report to the International Director according to instructions defined in the *Terms of Reference* for the investigation.

Responsibilities for prevention, reporting, documentation and information

The Swedish Director and the Regional Directors are responsible for keeping their subordinate staff aware of relevant policies and the IRM. The following are the specific responsibilities:

- Ensuring that subordinate staff are aware of and understand the relevant policies and the IRM.
- Ensuring that partners and communities we work with are aware of the IOGT-NTO Movement whistle-blower channel.
- Reporting all suspected incidents through the whistle-blower channel that may have been observed among staff and partners. This ensures that all incidents are logged. No investigation should take place until after the Director has given instructions and after consultation with the IC and their approval.
- Responsible for ensuring that every incident and its follow-up actions are appropriately documented. RDs ensure that documentation is submitted to the International Director and the Investigation Committee (depending on the Terms of Reference for the specific investigation).
- Responsible for the relevant information on the investigation process to the involved parties (depending on the Terms of Reference for the specific investigation).

2.6.2 Documentation

It is of utmost importance that every step in the investigative process is documented in writing, all management decisions undersigned and confidentiality guarantees are signed. Use the checklist in *Annex A Checklist for IRM* to ensure due process and documentation.

Documentation and working material should be stored in a specific area on the SharePoint server to which only the Investigation Committee has access. All reports and documents submitted to stakeholders outside this group needs to be carefully assessed before disseminated.

After closing of the incident, only decisions with their justifications are stored for archiving purposes.

3 Managing incidents

(For a graphical overview of the complete mechanism, please see page 2.)

3.1 Receiving complaints and incident reports

The process from receiving the incident or complaint, registering it in the incident register and decision on action to investigate must not be longer than 10 working days.

Note! Maximum 10 working days from registering complaint to make decision on investigation.

Only the Incident Registrar at the Secretariat and members of the Investigation Committee have access to the full database where complaints are registered. The Investigation Committee through the International Director can share information with the investigating Regional Director, in order for them to take the lead in the investigation. When sharing information, it is important to consider requests for anonymity and whistle-blower security.

1: Filing of the incident report/complaint

An incident report or complaint may come in any form. By word of mouth or written. Explicit or implicit. However, for it to be formally managed it needs to be registered through the IRM. This means that every member of IOGT-NTO Movement staff that comes across a credible incident or complaint is required to assist the complainant to register the incident. There is no requirement to seek the approval of a superior. Failing to do so, or obstruct anyone, is considered as a breach of Code of Conduct and the relevant policies and is in itself an incident.

Making an intentionally false statement in an incident report may lead to disciplinary action as it is considered as a breach of Code of Conduct and the relevant policy. Such a malign action should also be filed in the incident register.

The facts stated in the incident report should be precise and clear enough to make it possible to proceed with investigating the incident. Be aware however, that it is not the complainant that should do any investigation. Unintentional errors or misunderstandings in the complaint statement will not lead to any consequences. Because a complaint may contain errors and for security reasons, the complainant and the alleged perpetrator are always kept confidential throughout the investigation process.

Also, when serious issues that may be classified as corruption or harassment are detected in audits and other regular assessments, those incidents should be registered in the IRM by the unit carrying out or commissioning the audit or assessment.

2: Registering the incident and dissemination of information

The Secretary General's Secretariat ("staben") at the Sweden Office is responsible for the IRM and the incident register. The Incident Registrar ensures that the incident submitted to the incident email or through the website is recorded in the incident register, and informs the relevant Director and the Investigation Committee. Confirmation that the complaint is received is sent by the registrar to the complainant (if known).

The relevant Director must report to the Investigation Committee on initial actions. The Director should also brief the Secretary General that brings in the Press Secretary and the Chair of board if the case is a major incident or may evolve into an incident that may attract the attention of public media. The Chair of board may then inform the rest of the board if

considered necessary. Other key staff may also be given selected information to avoid rumours or if they need to be involved in the investigation, but under strict demands of confidentiality.

3. Assessing the complaint or incident

For documenting the process of investigating the incident please use
Annex A Incident Mechanism Checklist.

The initial assessment of a complaint is made on three levels (or in three consecutive steps).

- 1) First level of assessment is to determine whether the complaint or incident is possible to investigate at all. The complaint may have too little information to justify an investigation. For example it may lack the geographical location on a sufficient level, or the names or positions that are alleged to have committed the alleged complaint are missing. Complaints that are deemed not possible to investigate will be kept in the database in case more information comes in. Three years after initial record that entry should be deleted. If a complaint is not passing the first level of assessment it is considered as an *unqualified incident* in the incident database. No more action needs to be taken but the incident report will remain in the incident database for at least three years.
- 2) Second level of assessment is to analyse the context of the complaint. The complaint may look very minor at a first look. However, it may be one in a series of complaints regarding the same location, project or staff, or it may be related to breaches against operational guidelines. The assessment may indicate that some kind of investigation may be required. It may also indicate an issue related to human resources such as staff conduct or being an indication of hostile work environment. Still it may not be enough to warrant a full-scale investigation. A complaint or incident at this level is called a *minor incident*. Reaching this level should lead to at least a minor internal investigation of the incident and a small report with recommended actions to take.
- 3) Third level of assessment is to check if the incident in itself is classified as:
 - a. segregation, unequal treatment, harassment or corruption or other breaches of Code of Conduct;
 - b. implementation of programme or administration incident;
 - c. related to human resources such as recruitment;
 - d. related to procurement processes;
 - e. other reasons that may seriously compromise the IOGT-NTO Movement.

A complaint may be referring to several of the classes above and the classes may be related to each other. (I.e. harassment may be a way to threaten someone from disclosing corruption.) That should be taken into consideration in the decision to proceed on the complaint. A complaint reaching this level is called a *serious incident* and always requires a formal investigation formulated through a Terms of Reference.

For documenting how to make an initial assessment of an incident
please see *Annex B Guide to assess the complaint.*

Assessing external incidents (that are not complaints) that may be acts of *force majeure like* natural disasters and security and safety incidents out of our own control, shall also be

investigated in order for IOGT-NTO Movement to take appropriate action and improving the policies, manuals and routines.

4. Decision on action for serious complaints and force majeure incidents

Based on the initial assessment the International Director will decide on the action to take, and inform that decision to the Investigation Committee. The table below can be used to guide the decision on relevant action.

Decision on complaint				
<i>Type of complaint</i>	<i>Complaints related to serious cases of corruption, harassment or breach of Code of Conduct</i>	<i>Complaints related to breaches of programme policies and management of the programme</i>	<i>Complaints related to recruitment processes</i>	<i>Complaints related to procurement processes</i>
<i>Action</i>	(a) Forensic investigation by internal or external resources	(b) Operational investigation and action plan.	(c) Documentation investigation; have we followed our guidelines for recruitment?	(d) Documentation investigation; have we followed our guidelines for procurement?
Incident assessment (“external incidents”)				
	<i>Type of incident</i>	<i>Tentative actions to take (International Director initiate actions)</i>		
	Safety or security incident; <i>this may mean physical assault on staff members, burglary at our premises or fire.</i>	I. Consult the risk management plan for identification of counter measures, if incident is not identified in risk analysis, add it to the risk management plan. II. Delegate to relevant office to make an appropriate action plan that will manage: <ol style="list-style-type: none"> a. personal security for IOGT-NTO Movement staff; b. risks at target communities c. risks at partners d. organisational risks for IOGT-NTO Movement; e. operational risks for IOGT-NTO Movement; III. Initiate the organisational crisis management team; IV. Develop a communication plan for both internal and external communication needs. V. Review the policies, guidelines and manuals for changes that could have countered the incident and its consequences.		
	Environmental/natural disaster incident; <i>this may mean earthquakes, flooding or drought that affects our own staff and/or our operations and ability to reach the expected results.</i>			
	Political incident; <i>this may mean coup d’etat, political violence, quickly escalating repressive measures against IOGT-NTO Movement and partners activities to a degree that we cannot meet or objectives.</i>			

(a) Harassment, corruption or other breaches of Code of Conduct and other policies should result in a forensic investigation. A forensic investigation is aiming at *identifying the wrongdoings in relation to the code of conduct, policies, guidelines and the public law*. A forensic investigation confirming the incident, may in most cases lead to disciplinary action³.

(b) Incidents related to the operations of programmes and administrative routines should be investigated in order to understand gaps in the current policies and operational guidelines. It may in the process identify wrongdoings by IOGT-NTO Movement staff members that fall short of being a breach of Code of Conduct, anti-corruption and anti-harassment policies, but

³ *Disciplinary action* is defined in the Human Resources Policy.

still being against other established guidelines. In those cases, it may in exceptional cases warrant disciplinary measures. The investigation should result in an action plan where wrongdoings and improvement of processes and instructions has been identified. An action plan must accompany the investigation that clearly outlines how to share information, build capacity to avoid future incidents and how to rehabilitate and reconcile involved parties.

(c)-(d). Complaints related to recruitment are led by the relevant superior to the hiring director, and in the case of procurement it is led by the financial controller of IOGT-NTO. Those investigations are aiming at identifying wrongdoings and gaps in the recruitment and procurement policies respectively. In those cases, the main risk is nepotism and corruption, and if the investigation indicates this has happened, the case should be re-classified as a category (a)-case.

External incidents not related to critical breaches against Code of Conduct or policies are managed individually based on the unique situation.

If it is a serious complaint involving management members or when a case may have critical consequences for IOGT-NTO Movement as whole, for example if it may be of interest to media, the Chair of board or Secretary General may take the decision to carry out an investigation without the involvement of the relevant Director or other staff.

Any member of the Investigation Committee may highlight the need for this to the Secretary General or Chair of the board.

2.2 Investigation process for serious incidents

1. After decision on investigation is taken, in the International Department, the International Director will inform the Grant Coordinator that an incident report has been filed and indicate to what extent it may have affected the activities the Donors provide funding for. Depending on the consequences for the grant either the International Director or the grant coordinator will inform the donor. As part of the grant management IOGT-NTO Movement is obliged to inform the donors immediately about any incidents. This can be made either by a short email or telephone call. At this stage there is no need to provide any detail. The purpose is to inform the donor that IOGT-NTO Movement is doing an investigation and a final report will come within 3 months.

2. If the incident is of type (a), the relevant Director with support and approval from the Investigation Committee will develop a Terms of Reference for an incident investigation. The template *Annex C Terms of Reference – Investigation on Incidents* may be used and adapted for the specific needs of the investigation and depending on if it is an internal or external investigation.

The template Annex C Terms of Reference – Investigation on Incidents may be used and adapted for the specific needs of the investigation.

3. During the process of investigation no one involved in the investigation may disclose any details on the process or any information that has been communicated. Interviewees should be made aware that any disclosure may be considered as an *obstructive* practice of corruption. The investigator or investigating team may ask for a written guarantee from involved staff members to not disclose any information.

4. The investigation report can be written directly in the template *Annex C Terms of Reference – Investigation on Incidents*.

Remember that those involved in the investigation, either as investigators or interviewees are not allowed to disclose any information about the investigation.

4. Decision on result from investigation

1. When the investigation report is finalised by the relevant Director or the Secretary General or Chair of board, the report is shared with the Investigation Committee and Secretary General for a conclusive discussion on further action on the incident. The purpose is to level the Investigation Committee understanding of the incident, the context of the incident, how to further work to prevent corruption and misconduct, establish punitive standards and to give further recommendations to the relevant Director.

2. Based on the consultations and recommendations from the Investigation Committee and the mandates given by the Secretary General, the relevant Director initiates the required informative, punitive, legislative and other relevant actions, in consultation with the relevant RD if the incident is related to our offices abroad.

5. Information and Action after investigation

1. The Secretary General may inform the board and the Press Secretary. If the incident is considered to catch the attention of the public through media, a Crisis Group is established, based on the IOGT-NTO Movement crisis management organisation (see IOGT-NTO Movement Crisis Management Manual).

2. Donors are informed by either the International Director in serious cases or through the grant coordinator in minor cases by email. It is done through a specific donor report on incidents *Annex E Donor Report on Corruption*. The International Director should approve the report before submission to the donor, unless the Secretary General has decided that the report should be approved by s/he.

Institutional donors must be informed about the outcome of the investigation. Use *Annex E Donor Report on Corruption* for that purpose. It must be undersigned by either the International Director or Secretary General.

3. The relevant Director informs the complainant that the incident has been investigated and give a brief information on the outcome, actions to be taken and which policies and guidelines that are relevant for the actions taken.

4. The closest supervisor to any staff member that has committed the wrong-doing ensures that disciplinary action is taken according to the decision by the relevant Director ensuring

compliance with staff policy and labour legislation. It is of utmost importance that this process is well-documented ensuring compliance with local legislation, in order to avoid further liabilities for IOGT-NTO Movement. Any decision on disciplinary action should be delivered in writing and undersigned by both the staff member and the relevant Director. The decision should give clear motivations for the disciplinary action, and inform how to appeal the decision.

5. The relevant Director may take any other action, or instruct the Regional Director to do so, if that is considered required or in the best interest way for IOGT-NTO Movement. One example of such action is to file a complaint with law enforcement agencies and try to recover any losses.

5. The right to appeal

If there is a disciplinary action (written warning or dismissal) against a staff member in IOGT-NTO Movement, the staff member has the right to appeal, within two (2) weeks from the information on disciplinary action was given. The appeal should be filed to the Secretary General of IOGT-NTO Movement outlining what points in the decision and why the staff member is appealing. After receiving the appeal IOGT-NTO Movement has one month to further investigate the case. The Secretary General is then the lead for the investigation and may carry out the supplementary investigation at his/her own discretion.

There is no right to appeal if there is no disciplinary action.

6. Closing of incident

An incident may be closed after it has been investigated, all appeal rights are exhausted, financial losses resolved, legal proceedings closed etc. This means that in some cases an incident may not be completely closed until after a substantial time.

1. The relevant Director writes a final short report on the incident and submit to the Investigation Committee requesting a go ahead to close the incident.
2. After go-ahead is ensured the relevant Director submits the report to the Secretary General requesting the incident to be closed.
3. Secretary General approves the final report and decides to close the incident. All documentation should be stored with Secretary General Secretariat according to relevant legal archiving legislation.
4. The Incident Registrar marks the incident as closed in the Incident Database.

7. Developing capacity on managing incidents in IOGT-NTO Movement

7.1 Information responsibilities

The Investigation Committee have an oversight role and should keep themselves informed about the ongoing anti-corruption work.

The relevant Director is responsible for ensuring that every staff member is aware of what constitutes corruption and other incidents, mitigation of breaches against Code of Conduct and other policies, detection of irregularities and standard operating procedures when they are observed such as support to complainants). Training materials are developed, and materials are maintained by the instructions of the relevant Director.

Regional Directors are responsible to carry out trainings and ensuring that updates of policies are provided to their staff. All offices shall include in their partnership planning information on *IOGT-NTO Movement Incident Response Mechanism (IRM)* telling about

our whistleblowing channels, ensuring that partners inform the communities about the IRM and whistleblowing channels. Partners should also be informed about the Code of conduct and relevant policies, in order for them to include the communities. The regional offices are encouraged to develop flyers and stickers with information in local languages to be provided to the communities via partners.

7.2 Annual report on incidents, incident investigation and preventive incident measures

The Sweden-based Directors should in March each year provide the board with a report on the past year's work on incidents, including changes in steering documents, number of incidents reported, investigations and their outcomes. The report should focus on analysis and learning and give recommendations for the future.

8. Maintenance of the Incident Response Mechanism

With maintenance we mean:

1. Review and update of IRM⁴ should happen every second year.
2. Technical updates of IRM whistleblowing channel⁵, is done regularly when needed.
3. Updates of training and information materials⁶, is done every third year.
4. Ensuring organisational capacity to manage incidents, formal assessment is made every third year⁷.
5. System monitoring and reporting, should be done regularly and reporting annually in March.⁸

The International Director is responsible for the above maintenance measures. The Investigation Committee follow-up and oversee that the maintenance of the system is done.

9. Annexes to this manual

Annex A: Incident Response Checklist

Annex B: Complaint assessment tool (Section 3 in manual)

Annex C: Terms of Reference for Investigations on Complaints

Annex D: Incident Report to [Donor]

Annex E: Specification for Whistleblower-mechanism on the website

⁴ First review and update in Autumn 2020. Thereafter every even year.

⁵ Regularly when needed after the web-solution is online.

⁶ First versions to be developed during 2020.

⁷ First assessment is made 2020. Thereafter in 2022 and 2024 and 2026.

⁸ Beginning in 2021.