



SPORTEGRATION Complaint Management Policy

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Introduction

Purpose

This policy outlines how complaints that are filed to SPORTEGRATION will be managed.¹ With this policy, we aim to ensure that all complaints are handled fairly and consistently, according to the same rules and regulations regardless of any personnel changes. This policy reflects the values of SPORTEGRATION.

Scope

This policy applies to all staff members of SPORTEGRATION² who receive and manage complaints, and to any complaints made by any community member³, partner, employee, volunteer, or board member.

SPORTEGRATION expects its staff members at all levels to be committed to fair, effective, and efficient complaint management.

The following entities within SPORTEGRATION are responsible for complaint management:

Confidential working group

The confidential working group consists of a member of the SPORTEGRATION management, an external person, and a person of trust. The confidential working group makes all decisions related to complaints and is responsible for implementing the complaint management policy. The confidential working group is led by the person of trust. If the working group cannot come to a decision, they will turn to the board of SPORTEGRATION.

Persons of Trust

The Persons of Trust lead the confidential working group and act as the primary contact person between SPORTEGRATION and the parties involved in a complaint. The Persons of Trust monitor the various complaint channels, inform the working group, and document filed complaints. The Persons of Trust can also be asked to represent complainants who wish to stay anonymous.

¹ To learn which resources were used to draft this policy, please refer to Appendix 1.

² The term staff refers to all employees, volunteers, and board members who participate in the operations of SPORTEGRATION whether in a paid or unpaid capacity.

³ Any person who participates in any activity or event organized by SPORTEGRATION, in collaboration with SPORTEGRATION or in the name of SPORTEGRATION, or who is supported by SPORTEGRATION in any way.



What is a complaint?

A complaint is an explicit expression of dissatisfaction made to, or about, SPORTEGRATION. It can concern the services SPORTEGRATION provides, its staff members, its community members, or its partners. A complaint must be investigated and requires a response and a resolution.

Complaints can be divided into two categories, each of which requires different responses. The first type of complaints are so-called *operational complaints*. Operational complaints relate to how SPORTEGRATION activities and events are organized, the quality of work of the SPORTEGRATION staff, and how SPORTEGRATION makes decisions and operates. The second type of complaints are so-called *serious complaints*. These complaints are always related to serious misconduct, like any form of abuse or the misuse of funds or property.

A complaint is different from feedback in that feedback refers to both positive and negative opinions and comments about SPORTEGRATION, its services, staff members, community members, or partners. Feedback, however, does not require an explicit response or reaction. A complaint may underlie feedback. If we receive feedback indicating that something more serious is going on, we will do our best to reach the feedback giver to find out more.

We are working on establishing a feedback mechanism. Once ready, it will be published on the SPORTEGRATION website and shared with all community members through WhatsApp groups.

Example:

Feedback negative: I did not like the course because it was on a Wednesday evening (I would prefer another weekday) and the teacher/coach wasn't nice.

Feedback positive: I liked the course because I learned a lot and my teacher/coach was very nice.

Operational complaint: The teacher does not give clear instructions, shows up late for the class and doesn't bring with him the necessary class materials.

Serious complaint 1: The teacher routinely says racist things to me and treats me differently compared to the other students.

Serious complaint 2: The coach routinely tells us that we do not know how to do the exercises well because we are women and so worse at sport than men.



Guiding principles

Code of Conduct

This policy is based on a few guiding principles. Firstly, our decisions regarding what constitutes inappropriate behavior are based on our Code of Conduct. Depending on the role of the involved parties in SPORTEGRATION, we either refer to the Participant Code of Conduct or the Staff Code of Conduct. These documents can be found on our [website](#).

Victim centered approach

In cases of suspected abuse, we will follow a victim centered approach. The victim centered approach is defined as an approach that: “[...]places the rights, wishes, needs, safety, dignity and well-being of the survivor/victim at the center of all prevention and response measures[...]” (IASC, 2023, pp.1). The guiding principles of a victim centered approach are confidentiality, ensuring the physical and mental safety of the victim, respect for the right for self-determination of the victim, and non-discrimination.

We adopt a victim centered approach because it has been shown to promote recovery, reduce the risk of further harm and reinforce the agency and self-determination of victims of abuse.

Fairness

We will be fair towards all people involved in the complaint management process, be they the complainant, the target of the complaint or otherwise involved. This also means that we will not blame anyone before we have carefully collected sufficient information about the incident.

In our investigations we will remain objective and unbiased. If the complaint is related to any of the confidential working group members, they will not take part in the management process. If anyone in the confidential working group has a conflict of interest related to a complaint, they will not take part in the handling of the complaint.

Accessibility

The complaint handling process is made as easily accessible as possible:

Firstly, links to the complaint form and instructions on how to file a complaint are published on our website, as well as shared directly with our community members, staff, and partners.

Secondly, this information is available in all the major languages spoken within our community, as well as in the form of a video and an infographic.

Finally, people who require assistance in making a complaint may do so through a representative, for example, the SPORTEGRATION Person of Trust, a family member, a friend, or another organization.

Responsiveness and efficiency



All those who file a complaint will be listened to, treated with respect and actively involved in the complaint handling process where possible and appropriate. We will respond to all complaints promptly and keep on communicating openly and clearly throughout the process.

Once a complaint has been filed, the complainant will receive information on the expected duration of the process, what steps will be taken, and finally on the decision and the reasons behind it. If we are unable to handle their complaint, we will provide advice and assistance to the complainant about where such issues can be handled.

Based on the needs and wishes of each complainant, we determine the most appropriate and accessible mode of communication for each case individually. To the best of our abilities, we try and find solutions to situations where there is a language barrier between the complainant or involved person and the confidential working group. Such solutions include, but are not limited to, utilizing the services of a confidential translator, or online translation services.

Guarantee of no detriment or charge

We guarantee that filing a complaint with SPORTEGRATION in no way negatively affects the support that the complainant receives from SPORTEGRATION. Additionally, we will take all reasonable steps to ensure that the complainant will not be otherwise negatively affected by making a complaint.

Filing a complaint is fully free of charge.

Confidentiality and anonymity

We guarantee that the identities of complainants and other involved people are kept confidential. Only the confidential working group has access to identifying information.

If the complainant wishes to stay fully anonymous, they can do so.

However, it must be acknowledged that the SPORTEGRATION community is relatively small, hence it might be possible for the members of the confidential working group to deduce who the complainant is, without any identifying information. In case this happens, all members are aware that they are not allowed to express (verbally or in writing) their thoughts on who the complainant is.

Moreover, the choice to remain fully anonymous can affect the complaint handling process. The lack of any identifiable information can affect how the confidential working group is able to investigate the complaint, as well as their decision making and ability to take action. If the complainant wishes to share more personal information at any stage of the complaint handling process, they are free to do so, and the working group will take appropriate action based on the new information.



How can complaints be made

The primary channel for filing complaints with SPORTEGRATION is through the complaint [form](#). A link to this form can be found on the SPORTEGRATION [website](#). Complaints submitted through this form can only be accessed by the Persons of Trust, who will then inform the confidential working group.

Complaints can also be filed directly with the Persons of Trust via e-mail or WhatsApp.

We also realize that all our staff members are important and trusted contact points for our community members and partners. Complaints can be made to SPORTEGRATION staff members, who will then report them directly to the Persons of Trust or file them through the complaint form.

Reception and Acknowledgement of Complaints

Once a complaint has been received, it must be acknowledged. When a complainant has filled in the complaint form or filed a complaint via e-mail or WhatsApp, they will receive an automatic message confirming that their complaint has been received, explaining the next steps in the process and when they can expect an initial answer.

At reception, the complaint will be given a unique identifier which will be used in all internal communication to guarantee confidentiality.



Assessment and Investigation

Initial assessment

Based on the following set of core questions, the confidential working group will perform an initial assessment of the situation.

- Is the complaint classified as a complaint?
- If yes, is it an operational or a serious complaint?

If the complaint is not a complaint but, e.g., feedback, then the Person of Trust will get in touch with the complainant, inform them about the decision, and refer them to the correct channel, the feedback mechanism. If the feedback mechanism is not functioning yet, the Person of Trust will relay this feedback to the correct staff member.

In cases of serious complaints, the confidential working group will refer to internal guidelines.

The answers to the other questions define the need and possibility for further action and investigation.

- Is the issue raised in the complaint within the responsibility of SPORTEGRATION?⁴
- Are more issues raised in the complaint than just one?
- If yes, do these need to be addressed separately?

If the issue is not within SPORTEGRATION's area of responsibility, the confidential working group must assess what support can be provided to the complainant, whether they can be referred elsewhere for the handling of their complaint, and then inform the complainant.

If the complaint consists of multiple issues, it must be decided if they can be handled together or need to be handled separately. If the decision is made that they must be handled separately, then each complaint becomes its own entity, with its own identifier and will be documented separately.

Once the confidential working group has decided the complaint is a complaint within the area of responsibility of SPORTEGRATION, they will move on to make an action plan.

Plan of action

- How serious, complicated or urgent is the complaint?
 - Is the urgency of the complaint such that it requires immediate protective action before an investigation can be started?
 - What support does the complainant need?
- Does the complaint raise concerns about people's health and safety?
 - Are other people potentially at risk?
- How is the complainant affected by the issue raised?
 - Have they expressed how they want the issue to be handled?

⁴ See Appendix 2 for a more detailed description of what we consider within our responsibility.



- Have they expressed what they wish the outcome to be?
- What risks are involved if resolution of the complaint is delayed?
- Does finding a resolution require involving other organizations?
- What steps need to be taken to investigate the issue sufficiently?
 - Do any of the steps raise any concerns regarding the safety or well-being of the complainant?
 - Do any of the steps potentially lead to others being able to identify the complainant?
 - Do any of the steps potentially lead to others being able to identify a potential perpetrator?

The complainant will be involved in the process as much as possible. In practice, this means that any requests that they might have made while filing the complaint will be taken into account when deciding on a plan of action. The plan of action must be presented to the complainant and discussed before any action can be taken. If possible, changes must be made to the plan of action based on the input from the complainant. This is especially important in cases of serious complaints to ensure that victims of abuse can regain and retain agency over issues relating to their well-being.

If the complainant is someone who witnessed inappropriate behavior but was not the target of this behavior, parts of the action plan that involve sharing their identity with third parties must be discussed with them.

If the complaint was filed via a member of staff, but the staff member does **not** remain as a contact person, the Person of Trust will continue providing process updates (updates about the steps taken without confidential information) to the member of staff.

Since no two cases are the same, a plan of action will be carefully drafted by the confidential working group based on the premises of each individual case.

Investigation

If an investigation is deemed necessary to resolve the complaint, the confidential working group will follow the guideline below:

- Decision on who investigates
 - Who among the confidential working group is best suited to lead the investigation?
 - Do certain personal characteristics need to be considered, like gender or language skills?
- Is a translator needed in the process?
- Review all the details that the complainant has provided.
- If appropriate, be in touch with any parties who are (thought to be) involved.
 - This must be done in a sensitive and confidential manner, to ensure that there are no repercussions to the complainant.
 - Additionally, the identities of the people involved in the case should be equally protected as that of the complainant. This includes any possible perpetrators.



- Gather additional information about the issue of the complaint.
 - Are there people who have witnessed the issue at hand?
- Summarize all findings for ease of interpretation.

Determination of an outcome

The confidential working group will gather to review the results of the investigation and determine an appropriate outcome.

In order to determine an outcome, the confidential working group will review all previous complaints and their outcomes as a reference. This ensures equal handling of similar complaints across time.

During this process they will consider the requested outcome that the complainant put forward with their initial complaint.

If deemed appropriate by the confidential working group, the outcome can include disciplinary measures. Complaints might also be against the organization itself, which means that the outcome can include actions taken to improve the functioning of the organization.

Potential disciplinary measures include but are not limited to

- Exclusion from the specific activity where the issue took place, temporarily or permanently
- Exclusion from all SPORTEGRATION activities, temporarily or permanently
- Termination of a volunteer or employment agreement

Once a decision has been made, the Person of Trust will be in touch with the complainant and any relevant parties involved and provide them with:

- The outcome of the complaint, the steps taken to investigate the complaint, and the potential (disciplinary) actions that will be taken
- A clearly and understandably worded explanation for the decision
- The expected timeline for the actions

Once all the involved parties have been informed, the rest of the office team, as well as the board, should be informed (keeping the case anonymous).



Documentation and Analysis of Data

Documentation of open cases

When someone files a complaint, we will document the following information in as much detail as possible:

- Type of complaint
- Is the complaint anonymous?
- Contact information of complainant, if possible
 - If complaint is done on behalf of an anonymous person, details of the representative
- The date the complaint was submitted
- The channel through which the complaint was received
- Details about the issue(s) raised by the complainant
 - Including as many details as possible of what the complaint concerns and what exactly happened
 - Including details of where the issue took place and who was involved
 - Any other details they offer to substantiate their complaint
- Whether the complainant was personally affected or reporting a witnessed event
- The date or time period when the complaint happened
- Wishes of the complainant
 - Have they requested some form of action or support, or explicitly forbidden some form of action or support
 - What kind of an outcome do they wish for
- Preferred mode of communication with the Person of Trust
- Any other relevant information

When complaints are received, this information will be documented in a database which can only be accessed by the confidential working group. This information will be treated with full confidentiality and not shared with others without the complainant's explicit consent. In this database, each complaint will be assigned a unique identifier which will be used to refer to the case in all internal communications to maintain confidentiality.

Documentation of closed cases

Once a complaint is closed, we will keep anonymous records about:

- The details of the complaint
- The plan of action
- The outcome of the complaint, including any (disciplinary) action that was taken and the reasoning behind the decision
- People who were involved in the investigation and making the decision
- Any outstanding actions that still need to be followed up, including analyzing any underlying or root causes



Analysis of data

All the complaints will be analyzed on a yearly basis to scope out any underlying trends and determine whether structural changes in the organization are necessary. More specifically we will analyze:

- How many complaints were filed
- What types of complaints were filed
 - Anonymous/non-anonymous
 - Serious/operational/not classified as complaints/malicious
- Through which channels were complaints filed
- What kinds of complaints were filed through which channels
- What settings the complaints took place in
- Who the complaints involved
 - Anonymously: participants/volunteers/employees/partners
- What types of outcomes were reached

Data Protection

To ensure adequate data protection, the confidential working group will follow internal data protection guidelines.



Review of the Complaint Management Policy

This policy will be reviewed one year after its implementation. After the first year, this policy will be reviewed on a regular basis (every 3 years).

Malicious complaints and managing unreasonable conduct by people making complaints

It is possible that complaints are filed with malicious intent – meaning, with intent to hurt another person or the organization – and have never actually happened. Such complaints, called *malicious complaints*, can be recognized from their often-non-specific style where minimal details are provided. In addition, the tone of malicious complaints is often aggressive.

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible,
- The health, safety and security of our staff, and
- Our ability to allocate our resources fairly across any of the complaints we may receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.



Appendixes

Appendix 1 – Sources used for drafting this policy

This policy was written based on the following sources:

Ammerschubert, L. & Schenk, E. (2017). Complaint mechanism for non-governmental organizations – a practitioner's guide. Retrieved from: https://venro.org/fileadmin/user_upload/Complaint-Mechanisms_final.pdf

Dorcas (2021). Feedback and complaint mechanism. Retrieved from: <https://dorcas.org/wp-content/uploads/2022/02/Feedback-and-Complaint-mechanism.pdf>

Wallace, S.A. (2018). Fact sheet – Complaint handling by charities and not-for-profits. Retrieved from: <https://volunteeringhub.org.au/complaint-handling-by-charities-and-not-for-profits/>

The Lutheran World Federation, Save the Children & World Vision (nd). Procedure for joint complaint and response mechanism (JCRM). Retrieved from: https://www.google.com/search?q=LWF%2C+save+the+children+and+world+vision+joint+complaint+and+response+mechanism&oq=LWF%2C+save+the+children+and+world+vision+joint+complaint+and+response+mechanism&gs_lcrp=EgZjaHJvbWUyBggAEEUYOdIBCTI1Mjg4ajBqN6gCALACAA&sourceid=chrome&ie=UTF-8

IASC (2023, 6th June). IASC definition and principles of a victim/survivor centered approach. Retrieved from: <https://interagencystandingcommittee.org/iasc-champion-protection-sexual-exploitation-and-abuse-and-sexual-harassment/iasc-definition-principles-victimsurvivor-centered-approach>



Appendix 2 – SPORTEGRATION responsibility

Not all complaints that are filed by SPORTEGRATION community members, staff, or partners can be considered within the responsibility of SPORTEGRATION as an organization. As a general guideline, SPORTEGRATION will only handle complaints that are:

- Related to the actions of SPORTEGRATION staff members,
- Related to issues that took place in SPORTEGRATION activities or events,
- Related to issues that took place in activities or events of SPORTEGRATION partners, in which SPORTEGRATION was an official partner or otherwise involved,
- Related to behavior of SPORTEGRATION partners,
- Related to issues between SPORTEGRATION community members.

Though we wish to support our community members according to their needs, we are not able to handle complaints related to:

- Their asylum application, that of a family member, or issues with family reunification,
- Issues with SEM,
- Issues with the state, canton or municipality,
- Issues with asylum centers or housing
- Issues related to getting a driver's license, reading letters, or other similar administrative issues.

We want to emphasize that we hope to support our community members to the best of our ability in a range of issues. However, the complaint form is not the correct channel to approach us with these issues. Instead, community members should refer to our website, where we have collected a list of counselling centers and organizations, who they can turn to for support.