

## Enterprise Challenge Pakistan

### **SEED's Complaint and Reporting Management System**

If you have concerns that an employee, mentor and other representative has behaved in a manner that contravenes the Code of Conduct, please follow the process below:

#### **Complaint Investigation and Escalation Management:**

- On receipt of any complaint an investigating manager will be appointed to investigate the matter.
- Where the matter impacts, or potentially impacts on a partner organisation this will be raised with the nominated partner contact.
- The investigator will speak with the person raising the concern, the person whom the complaint is about (where safe to do so), an assessment will be undertaken to make sure this does not put the person raising the concern at risk of further harm and potentially any other person who may have witnessed such behaviour. Where this involves interviewing children or young people, then it will always be undertaken with specific safeguarding protections in place.
- Where the matter relates to an issue that may have criminal repercussions or breach regulatory standards the appropriate authorities will be contacted.
- Anonymous concerns will be taken seriously and investigated where possible. If there are concerns about confidentiality, please discuss with the investigation officer. The investigator will report back their findings.
- Where the investigator deems there is a potential case to answer, a disciplinary hearing will be set up.
- Where the findings point to criminal activity or activity that breaches regulatory standards, then the relevant authorities will be alerted if they have not already been.
- A quarterly report of actions under this policy will be made available to the partner organization and anonymized findings will be made available to any partner organizations to demonstrate due diligence and transparency.

#### **Escalation and Investigation Process:**

##### **First Step:**

All complaints by a young person should be raised with his/her teacher or the SEED Ventures coordinator appointed to his/her school. The SEED Ventures coordinator will note down details of the incident such as: person name with designation who committed the offence, date and time, name and contact of the complainant (this is optional if complainant wishes to be anonymous) and exact occurrence of events.

The coordinator will be responsible for developing a written report of the incident with suggestions for resolution and forwarding it to the Programme Manager for Enterprise Challenge Pakistan.

The Programme Manager will review the case and assess whether it falls into one of the following categories:

**Low risk cases**

E.g.: YP interact with an external adult who has not undergone a criminal check, YP were in the presence of a mentor without their teacher,

Medium risk cases	E.g.: YP share their location or full name with mentor, YP are involved in Facebook or Instagram interaction with mentor, YP contact the mentor directly outside of session hours.
High risk cases	E.g: YP experiences emotional, physical or sexual abuse by any party.

**Second Step:** Upon categorization, the Programme Manager will determine the most suitable course of action. In low-risk cases, a warning will be issued to all parties involved with reiteration of rules. If this violation occurs again, students or mentors may be disqualified from the programme. In the case of medium risk cases, a warning will be issued to all parties involved along with reiteration of rules as well as immediate request of ceasing all communications or activities outside the programme. In high risk cases, the offending party will be removed from the programme with immediate effect.

**Third Step:** If the matter is serious and passed the first and second steps without resolution, the matter will be escalated to SEED's Senior Management or to the Law Enforcement Agency. The timeline and the process should be updated to the complainant. Depending on the severity, the complaint may directly reach to the second or third step.