



Suggestions, Complaints and Commendations Policy

Educo 2021

Department responsible:

Impact and Organisational Improvement

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Languages available: Spanish, French, English

Scope: Entire organisation

Related documents:

- Ethical Code
- Code of Conduct
- Code of Good Governance
- Compliance Code of Conduct
- Child Safeguarding Policy
- Rules of Procedure for the Whistleblowing Channel
- Antifraud and Corruption Policy
- Policy on Protection against Sexual Exploitation, Abuse and Harassment (PSEAH)
- External Transparency Policy
- Child Participation Standards

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Commendations Commission

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Contents

1. Introduction	4
1.1. Definitions	5
1.2. Aim	6
1.3. Coverage	6
1.4. Principles	7
1.5. Related documents	9
2. SCC Management	10
3. Roles and responsibilities in the application, implementation, monitoring and reviewing of the SCC policy	13
4. Learning, continued improvement and accountability	16
5. Change log for the SCC policy	17
6. Bibliography	18
7. Annexes	19
Annex 1. Contact details for submitting SCC via email	19
Annex 2. Flow chart of the SCC management process	20



Educo's SCC mechanisms are one of the pillars of the global institutional accountability system.

1. Introduction

As established in the Global Impact Framework 2020-2030, the document which will guide the institutional actions for that decade, Educo is governed by a series of principles and values, including the **transparency principle**: we base our work on honesty, responsibility and the maximum access to information in relation to resource management and the impact of our actions, in pursuit of the highest levels of social and economic accountability.

In fact, the Global Impact Framework 2020-2030 also establishes **accountability** as one of the supporting approaches that needs to be mainstreamed in our organisation's work. At the same time, accountability is one of the Educo Program Quality Criteria. In this way, Educo promotes an accountable culture for all the people we work with and for, understanding it as the construction of an ongoing, relevant and meaningful dialogue with our stakeholders, for which it is essential to implement, as an integral part of all our actions, **mechanisms that promote their participation and feedback**, and that are adapted to their diverse needs and preferences, particularly in the case of children and adolescents.

In fact, Educo's promotion of the culture of accountability goes beyond the internal sphere to include the **support and strengthening of the local partner organisations** we work with in the adoption and/or adaptation of their own mechanisms, in order to reach our stakeholders in the best possible way.

Additionally, through the membership, active participation and commitment to the Accountable Now network, Educo is progressing towards the full integration of the **Global Standard for Accountability of Civil Society Organisations**, an international reference standard that encourages organisations to establish a close link with all their stakeholders, thus continuously improving their performance and reinforcing their capacity to generate a positive impact.

Specifically, in the eleventh of its twelve commitments, the standard establishes the need to ensure that institutional decision-making processes take into consideration and respond to the opinion of staff, both permanent staff and volunteers or others, of partner organisations and, in particular, of the people for and with whom they work. This therefore requires that the organisations are willing to request opinions and contributions, as well as setting up a **constructive feedback system** for reflection, debate and action.

In this way, this policy is **one of the pillars of the global institutional accountability system**, as it is the tool that lays the foundations for all stakeholders, both internal and external, to submit their suggestions, complaints and commendations, and for these to be managed in the best possible way.

1.1. Definitions

- **Complaint:** Any indication of dissatisfaction with the activity carried out by Educo¹. Complaints can be related to activities the organisation develops, strategy, decisions, policies, use of resources, alliances, or the behaviour of the people who work for and/or representing Educo, among others. The only exceptions are those actions or conducts that are against the law, or contrary to the contractual commitments or obligations assumed and/or contrary to internal regulations, which could therefore result in a reported incident (see definition of 'reported incident or concern').
- **Suggestion:** Any proposal or recommendation for modifications or improvements in relation to the activity developed by Educo, with the aim of improving the management and operation of the Foundation.
- **Commendation:** Expression or show of satisfaction and/or recognition related to any aspect of the activity developed or results obtained by Educo and its team.
- **Suggestions, Complaints and Commendations Mechanisms (SCC):** Mechanisms for receiving suggestions, complaints and commendations about our work, as key tools for continuous improvement and to reinforce our impact. An SCC mechanism is the way in which the SCC is presented, such as, for example, a physical letterbox, an email address, an online form, etc.

SCC are different from reported incidents and are managed separately. For Educo, reported incidents are defined in the following way:

- **Reported incident or concern:** The communication of any indication or suspicion of irregularity, non-compliance and/or actions contrary to the law, any breach of assumed contractual commitments or obligations and/or internal regulations, as well as any type of irregular, illicit or criminal conduct.

Educo has a specific channel for presenting reported incidents. For more information, see section 2, *SCC Management*, in the section: *Referral to other mechanisms*.

1. The activities carried out by Educo include both those activities carried out directly by Educo as well as those carried out through its local partner organisations, service providers or collaborators.

1.2. Aim

The aim of this policy is to establish the ethical and operational framework to be applied to the mechanisms for handling suggestions, complaints and commendations (hereafter, SCC) at Educo.

With this policy, we seek to identify areas for improvement in everything that involves the fulfilment of our institutional mission, within a process of continuous learning.


Specifically, this policy provides the general framework for the implementation, management, promotion and evaluation of specific mechanisms that enable us to receive and respond to the SCC received.

1.3. Coverage

This policy has a global scope and is to be applied to all Educo stakeholders, internally and externally, and in particular to:

- a. People who participate in programs, projects or other initiatives, in particular children and adolescents.
- b. Educo Board of Trustees.
- c. Educo staff: employees, volunteers and trainees, interns and work experience staff.
- d. Goods and services providers.





SCC management is part of the Foundation's continuous improvement and learning process.

- e. People who collaborate with Educo (child sponsors, donors, supporters).
- f. People who visit the programs and projects in the field (press, photographers, consultants, etc.).
- g. Local or international partner organisations who have a formal contractual relationship with Educo.

1.4. Principles

During the handling of SCC, Educo guarantees that its procedures comply with the following principles:

- a. **Accessibility:** Educo is committed to implementing SCC mechanisms adapted to the needs and contexts of all the different stakeholders, including children, adolescents and adults who participate in our projects, supporters, internal staff and the staff from our local partner organisations, among others. Therefore, we consider it essential to consult with our stakeholders about their preferences in the presentation of SCC, and then design and adjust the mechanisms based on their feedback.
- b. **Cultural and linguistic diversity:** Adaptation to local cultural and linguistic norms will be ensured throughout the process for designing, handling and promoting SCC mechanisms. Similarly, the stakeholders will be able to communicate their SCC in any language and where possible, efforts will be made to reply in the same language.
- c. **Mutual respect:** Educo respects all people and makes no distinction with regard to those who present SCC. All people who present an SCC will be treated with respect, regardless of the reason for their SCC. Similarly, Educo hopes that the people who present SCC will be respectful with the organisation and the people who work for it, as well as respecting the process for handling SCC.

- d. **Good faith:** It is assumed that people who submit complaints to the Foundation are acting in good faith in relation to the authenticity of the complaint, and that they are not acting to the detriment of Educo, its members and/or its local partner organisations.
- e. **Confidentiality and protection:** Educo, in order to protect the people involved, agrees to maintain the confidentiality of all personal data and the information in the SCC that are presented. Furthermore, any personal data provided will be processed in accordance with the provisions of the relevant legislation in each country. Educo reserves the right to contract third parties to facilitate the resolution of the suggestion or complaint if considered necessary.
- f. **Impartiality and objectivity:** Educo will try to manage all the SCC that are received objectively. For this purpose, in cases where a more exhaustive assessment is required, a commission will be set up with representatives from different areas. People with any conflict of interest in the case will be excluded.
- g. **Fast response:** Educo will manage all the SCC as quickly as possible and will inform the person who presents the complaint or suggestion of the resolution or the status of the procedure as soon as possible.
- h. **Continuous improvement and learning:** It is understood that SCC management is part of the Foundation's continuous improvement and learning process. In this sense, Educo will carry out periodic participatory evaluations of its SCC mechanisms to ensure that they respond to the needs of the different stakeholders and in order to introduce improvements to how they function.



1.5. Related documents

- Ethical Code
- Code of Conduct
- Code of Good Governance
- Code of Conduct on Regulatory Compliance
- Child Safeguarding Policy
- Regulations for the Whistleblowing Channel
- Antifraud and Anticorruption Policy
- Policy on Protection against Sexual Exploitation, Abuse and Harassment (PSEAH)
- Open Information Policy
- Child Participation Standards



We are committed to implementing SCC mechanisms that are adapted to the needs of all our stakeholders.

2. SCC Management

Presentation

All SCC are presented using the mechanisms defined in each country and adapted to the local context: such as, for example, post, fax, telephone, in person or via social media. As a minimum requirement, all the National SCC Committees have a specific email address for receiving SCC (see *Annex 1 Contacts for submitting an SCC via e-mail*).

Register

In each country office, the National SCC Committee centralises reception and registers everything that comes in through the SCC mechanisms. This register will enable the correct handling, monitoring, resolution and evaluation of the SCC and, in the case of commendations, communication to the people involved.

Referral to other mechanisms

In the event that information relating to infringement of the Child Safeguarding Policy or the Policy on Protection against Sexual Exploitation, Abuse and Harassment (PSEAH) is received through the implemented mechanisms, the National SCC Committee will refer it immediately to the Safeguarding Committee of the corresponding Country Office or the Head Office Safeguarding Committee. In turn, the Safeguarding Committee will follow the established procedure and will notify the Compliance Committee, either immediately via [WhistleB](#) – for serious or very serious cases – or as part of the process for updating information – for less serious cases.

In the event that a reported incident relating to infringement of any other internal code, policy or regulation is received through the implemented mechanisms, the National SCC Committee will refer it to Educo's whistleblowing channel, which is managed by the Compliance Committee via WhistleB. The Compliance Committee will notify the relevant bodies including, if necessary, the Internal Audit and Compliance Department.

The difference between SCC and *reported incident* is detailed in section *1.1 Definitions*.

The following table summarises the procedure for referring reported incidents:

Report received via SCC mechanisms relating to:	The SCC Committee refers to:
Infringement of the Child Safeguarding Policy	Safeguarding Committee of the corresponding Country Office or Head Office Safeguarding Committee
Infringement of the Policy on Protection against Sexual Exploitation, Abuse and Harassment (PSEAH)	
Infringement of any other internal code, policy or regulation	Compliance Committee via WhistleB

In the event that Educo receives SCC that involve issues that are outside the scope of its work, it will suggest that the person presenting the SCC address it to the competent body/authority.

Resolution

Once registered, the SCC will be sent to the corresponding area/department for analysis and resolution. The area/department that receives the SCC is responsible for analysing it and taking a justified decision on the matter within 15 days. The National SCC Committees monitor the resolution and will inform the person who presented the SCC about it.

Response

The National SCC Committee will contact the person who presents the SCC to inform them of the decision that has been taken within 15 days of its reception, or inform about the progress made to date and the expected timeframe for a response or resolution. Likewise, they will be informed of the possibility of appealing against the response.

Appeal process

In the event that the person who has submitted a complaint is not satisfied with the resolution of the complaint or the response received, he or she will have the opportunity to appeal for a review of the process.

The request will be acknowledged within 5 days and the Foundation agrees to handle the appeal and to inform all parties involved of the resolution reached as soon as possible.



All of the SCC will be registered, from their reception to their resolution.

In order to ensure the objectivity of the appeal process, a person or commission, different from those who initially managed the process, will be in charge of carrying out the review.

The whole handling process for SCC is described in *Annex 2 Flow chart for the SCC handling process*.

Management of anonymous SCC

The people who present SCC will need to identify themselves, indicating their full name, and some contact details. However, complaints submitted anonymously will be accepted if the issue requires investigation, in order to protect the people involved.

Types of SCC we will not resolve

We reserve the right not to resolve SCC that are presented in an offensive or discriminatory manner.

We will not resolve any SCC that involves issues that are outside the scope of our work. We will suggest to the person that they present the SCC to the competent body/authority. Educo, where necessary, can accompany the person in this process.

3. Roles and responsibilities in the application, implementation, monitoring and reviewing of the SCC policy²

The correct implementation of the SCC Policy is the responsibility of all the people who are part of the organisation, from the Board of Trustees to the management bodies and the whole staff team.

The specific responsibilities for each group are as follows:

All staff

All Educo staff must know about the SCC Policy and the available mechanisms for presenting SCC, and agree to forward any SCC they may receive personally (via their institutional email, for example) to the official channel immediately, as well as facilitating the work involved in managing specific SCC, for example, providing required information in a timely manner.

Management bodies

The management bodies³, both at head office and in the country offices, will support the implementation of the SCC Policy, promoting spaces for assessment, monitoring and accountability on actions to be taken in response to SCC received. They will also ensure that the agreed measures are implemented by the departments concerned.

Similarly, the management bodies will also be prepared to make changes to their work plans in the event that the measures to be taken require it.

2. For more information about the roles and responsibilities in the application, implementation, monitoring and reviewing of the SCC Policy, see the tool *MEAL 6.11 Guide to designing and implementing SCC mechanisms*.

3. The management bodies are the management teams in each country office, and the Management Committee at Head Office.

Departments/Areas

Depending on the issue, the departments or areas must participate in the resolution of the SCC, for example, providing their specific technical knowledge. The heads of the different departments or areas must provide their full support and collaboration, and be committed to implementing the measures agreed in response to the SCC received. At the same time, they must keep the SCC Committee informed about any progress or delays in the process. They must be willing to carry out changes to their planning if the measures to be taken so require it.

Global SCC Commission

A Global SCC Commission has been created, whose main duties are:

- Sharing of the SCC Policy and its updates with the Educo staff team. The policy is also part of the induction training package for new staff and is shared with all the Educo stakeholders through the institutional website.
- Implementation of the SCC Policy, ensuring its fulfilment and the application of the guiding principles in it and supporting the National SCC Committees to implement it at a national level.
- Monitoring and regular evaluation of the implementation of the SCC Policy.
- Capitalisation, systematisation and sharing of good practices and lessons learned.
- A review of the policy every five years and presentation of possible modifications to the Management Committee and subsequently to the Board of Trustees for approval. The Global SCC Commission will facilitate a participative review process.

National SCC Committees

National SCC Committees have been created in each country office and at Head Office, whose main duties are:

- Design, set-up, promotion and evaluation of the SCC mechanisms.
- Management of the SCC received according to the procedure developed at Country Office level, including registration, communication of the resolution and monitoring and accountability about the measures adopted.

- Analysis of the SCC received and identification of lessons learned.
- Elaboration of a summary of the SCC received and the measures taken, which the relevant management body will review at its periodic meetings.
- Accountability for the different stakeholders and the Global SCC Commission, both about the handling of the SCC received and the progress achieved in the implementation of the policy in general. In particular, the National SCC Committee will issue an annual report to the Global SCC Commission about the SCC received, their handling and resolution, as well as any progress, good practice and lessons learned. These reports will be used to write the relevant institutional global report.
- Continuous promotion of the existence of the SCC Policy among internal and external stakeholders.
- Accompaniment for the local partner organisations in the handling of Educo's SCC.
- Support and accompaniment for local partner organisations in the development and implementation of their own SCC Policy, if they request it.



Educo is committed to being open to constructive criticism and promoting flexibility in the way we work.

4. Learning, continued improvement and accountability

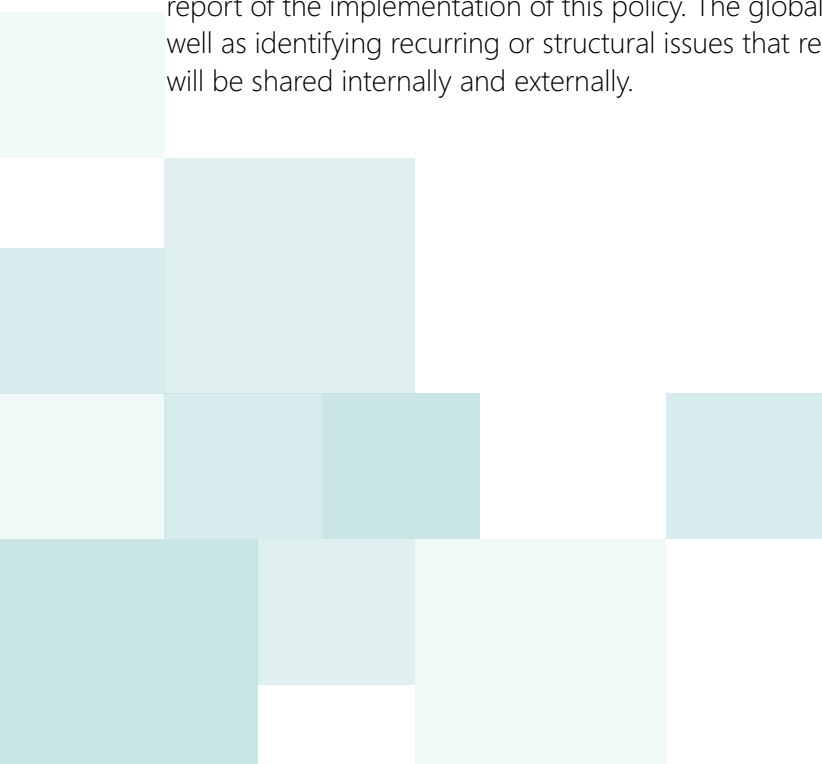
We understand that having working SCC mechanisms means being able to employ the SCC received as opportunities to improve. In this respect, Educo is committed to promoting being open to constructive criticism and flexibility in the way we work, to ensure that the SCC mechanisms are a tool for improving our work.

As mentioned in section 2, all SCC will be registered, from their reception through to their resolution. This process includes the identification of lessons learned for each SCC managed.

On the other hand, the National SCC Committees carry out regular monitoring of the SCC presented, with the aim of identifying trends that allow us to take corrective measures in an agile and proactive manner.

The National SCC Committees must be accountable on a regular basis to their different stakeholders about the SCC received, the measures taken to resolve them and the lessons identified, as well as the progress in implementing this policy. This process will always be carried out confidentially.

Similarly, the National SCC Committees must send this information to the Global SCC Commission on a regular basis in order to include it in the global report of the implementation of this policy. The global report will serve to analyse and improve the processes and practices carried out by the Foundation, as well as identifying recurring or structural issues that require attention. It will be submitted to the Management Committee for analysis and assessment, and will be shared internally and externally.



5. Change log for the SCC policy

Version no.	Description	Date
01	Initial version	2012
02	Updating of the format and inclusion of information about the withdrawal of products	2016
03	Alignment with the new structure for implementing the policy (creation of the Global SCC Commission and the National SCC Committees), including new roles and responsibilities	2021

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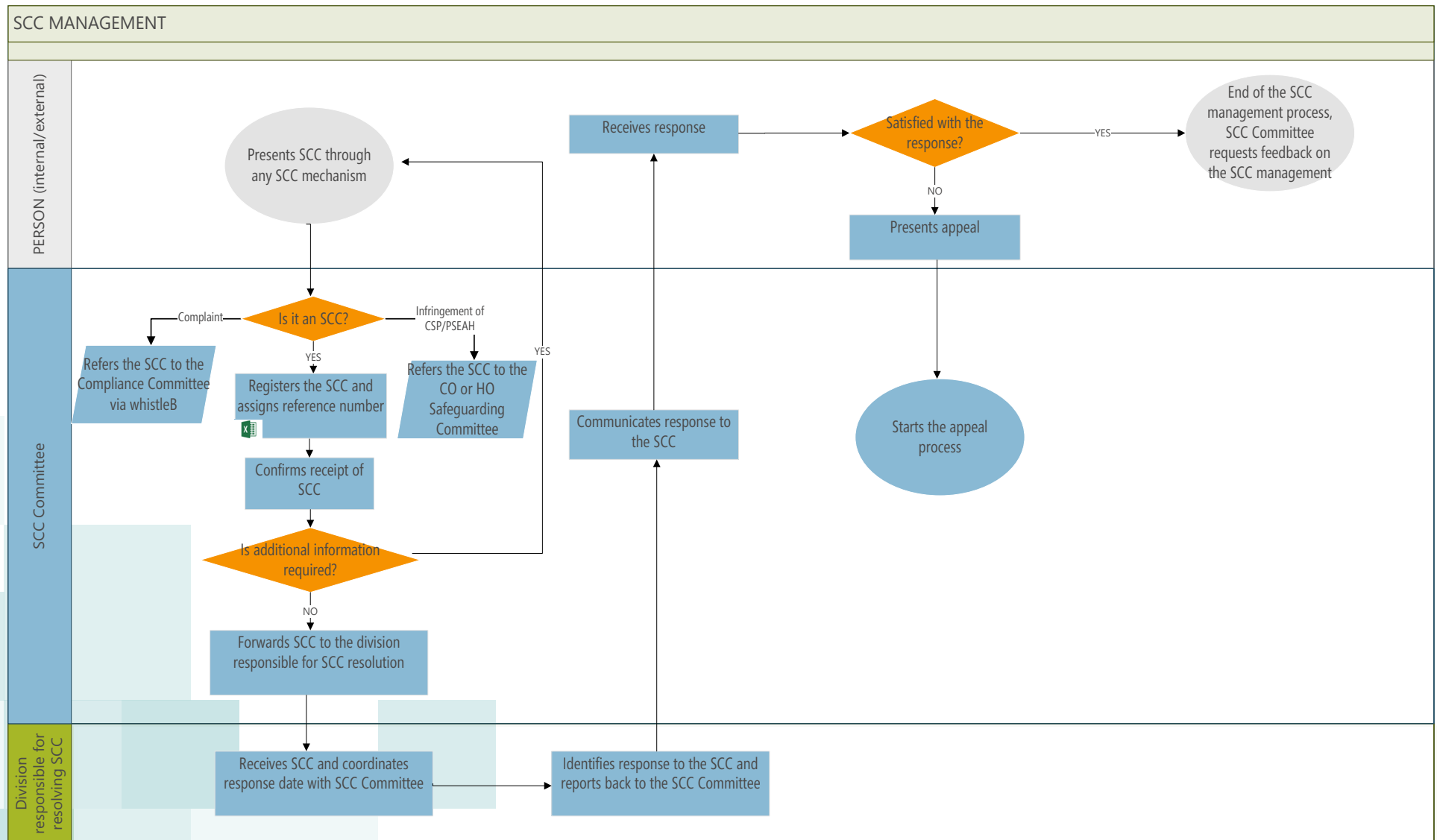
7. Annexes

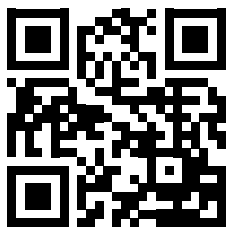
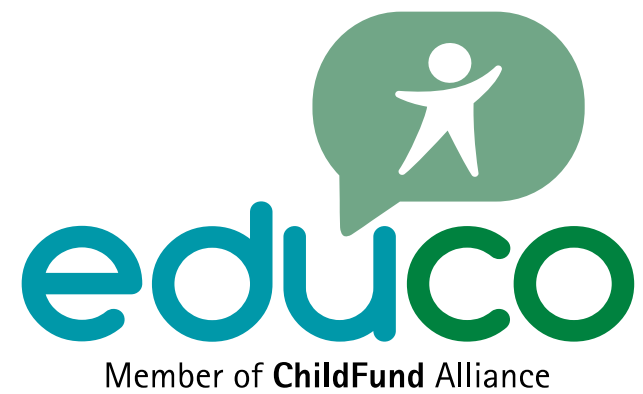
Annex 1. Contact details for submitting SCC via email

Below are the email addresses for submitting an SCC via email to the relevant SCC National Committee. In addition to email, each National SCC Committee will put in place appropriate mechanisms for each context.

Country Office	SCC Email Address
Bangladesh	scc.bd@educor.org / myopinioncounts.bd@educor.org
Benin	srs.bj@educor.org / monaviscompte.bj@educor.org
Bolivia	sqf.bo@educor.org / miopinioncuenta.bo@educor.org
Burkina Faso / Niger	srs.bf@educor.org / monaviscompte.bf@educor.org
El Salvador	sqf.sv@educor.org / miopinioncuenta.sv@educor.org
Guatemala	sqf.gt@educor.org / miopinioncuenta.gt@educor.org
India	scc.in@educor.org / myopinioncounts.in@educor.org
Mali	srs.ml@educor.org / monaviscompte.ml@educor.org
Nicaragua	sqf.ni@educor.org / miopinioncuenta.ni@educor.org
Philippines	scc.ph@educor.org / myopinioncounts.ph@educor.org
Senegal	srs.sn@educor.org / monaviscompte.sn@educor.org
Spain	sqf.es@educor.org / miopinioncuenta.es@educor.org

Annex 2. Flow chart of the SCC management process





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