Guidelines for complaints about the Swedish Red Cross



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1 Introduction

1.1 When things go wrong

Unfortunately, it does happen that individuals, volunteers, elected representatives, and employees of the Swedish Red Cross behave badly, violate the law, our statutes or our code of conduct when participating in or exercising responsibility for activities, handling finances and/or personnel matters. It is important that this is brought to our attention, investigated and dealt with. In order to do so, the Swedish Red Cross has a number of procedures and also dedicated staff members who provide guidance in different types of complaints cases.

This guideline describes different ways to leave comments and complaints to the Swedish Red Cross.

Section 2 of this guideline is aimed at those who wish to make a complaint or report incidents to the Swedish Red Cross. Here, three different ways of how to leave a complaint are described or what to do if witnessing illegal conduct. If you comment or make a complaint about our health care services, please turn to section 2.4.

Section 3 is an in-depth look at how the Swedish Red Cross handles different complaints and what the consequences are. Section 4 describes the process for cases involving irregularities or complaints directly related to our branches.

1.2 It is important to complain!

The Swedish Red Cross believes that it is of importance that incidents and complaints come to light. It helps us to identify errors and take action, which gives us the opportunity to improve our organisation and our operations, as well as review our procedures.

To leave a complaint or an opinion about the Swedish Red Cross should be easy, and everybody has the possibility to do so. Those who come into contact with the Swedish Red Cross occasionally, those who participate in our activities, and those who are volunteers, elected representatives or employees, should feel safe to make a complaint when witnessing inappropriate behaviour. Making a complaint should be easy: If you want to make a complaint, you shouldn't need to be familiar with internal procedures or fill in complicated forms. The information you need should be easily accessed on our website and is based on this guideline.

1.3 What does it mean to complain?

To make a complaint about the Swedish Red Cross means to formally express your dissatisfaction with how individuals, volunteers, elected representatives, and employees within the organisation have acted, or how the organisation, as a whole, acts. Complaints are different from, for example, feedback and opinions because complaints require a response from the Swedish Red Cross. A complaint can be about something that you have experienced or been subjected to or something that you have seen someone else be subjected to. It can also be about suspicions that something has happened. You do not need to have proof of your suspicions, but your report must be made in good faith.

2 To leave a complaint

If you witness something that is, or something that you suspects is, illegal, in violation of the Swedish Red Cross' Code of Conduct or other internal rules, you should report it.

We have three steps in our complaint handling: direct dialogue with the person in charge, notification via Info-service and notification via our external whistleblowing function. We also have a specific complaint handling procedure for our healthcare services.

If you have been the victim of a crime or suspect a violation of the law, you should always file a report to the police. You can either file a police report yourself or give information to someone at the Swedish Red Cross who can then help you file a report.

If you would like support with your report, please contact Infoservice as indicated below.

2.1 STEP 1: Make a complaint to your volunteer leader, chairperson or manager

If you are a **participant** in one of the Swedish Red Cross' activities and want to submit a complaint, you should first contact the person responsible for the activities where the incident took place as soon as possible. This can be either the volunteer leader who was responsible for the activity, the chairperson of the local Red Cross branch or a manager of the activity. The person to whom you report the matter has a duty to address the issue seriously and work towards a solution.

If you wish to submit a complaint about the Swedish Red Cross's activities or employees as centrally employed staff, or as **field staff member**, you should in the first instance turn to your manager. The manager will handle the matter and can, if necessary, take support from the manager's handbook and the HR department. If your manager is involved in the matter you wish to report, or has not handled your complaint properly, you should turn to your manager. You can also turn to the HR department for advice and support, or seek help from the local work council or union.

If you, as a **delegate seconded to the ICRC or IFRC**, wish to file a complaint about the activities or employees of the Swedish Red Cross, you should in the first instance contact the regional manager who signed your employment contract. If your regional manager is involved in the matter you wish to report, or has not handled your complaint properly, you should turn to the next higher manager or his/her supervisor. You can also contact the International HR Unit for advice and support.

If you, as **a field staff member or seconded delegate**, wish to file a complaint about the activities of another national association, IFRC or ICRC, you should contact the person in charge of that activity. You can also contact the International HR Unit for advice and support. If you do not feel comfortable with any of this, or if you feel that the matter has not been handled in an appropriate manner, you can complain through the whistleblowing functions of the IFRC¹ or ICRC².

¹ <u>https://media.ifrc.org/ifrc/what-we-do/inclusion/protection-gender-inclusion/ensuring-dignity-safety-communities-volunteers-staff/</u>

² https://www.icrc.org/en/document/code-conduct-employees-icrc

2.2 STEP 2: Leave a complaint to Infoservice

If you cannot or do not want to contact your district chairperson, manager or volunteer leader to make a complaint, you should contact the Swedish Red Cross Infoservice. You can also do this if you don't know who is responsible for the specific activity you want to complain about.

The staff at Info service will receive your complaint, and make sure it is handled by the right person within the organisation. You can either call or email Info service, and if you wish to remain anonymous, you can also send a letter. Please remember that the Swedish Red Cross will not be able to provide feedback on complaints that are submitted anonymously.

Contact Info service:

E-mail: info@redcross.se

Phone: 0771–19 95 00 (all weekdays 10.00–12.00 and 13.00–16.00)

Letter: Infoservice

Swedish Red Cross

Hornsgatan 54 / Box 17563

118 91 Stockholm

You can also complain about **the way our activities and association are run** to Info service. These types of complaints can, for example, be about how our basic principles are not upheld in our treatment and attitudes, that activities do not reach those for whom they are intended or are carried out in an inadequate manner. Info service will draw the complaint to the attention of the concerned party or organisation so that they can take action.

If you discover that a local branch board - or one of its volunteers or employees - is doing something that constitutes **a violation of the statutes and regulations of the Swedish Red Cross**, the matter should be sent to Info service in the first instance. They will then ensure that the relevant units within the service organisation are informed and/or involved in the matter if needed.

2.3 STEP 3: The Swedish Red Cross Whistleblower function

If you do not feel comfortable turning to the local branch chairperson, manager or volunteer leader, or to the Swedish Red Cross Information Service, you can report your case to our whistleblower function. The whistleblowing function is handled by the auditing firm PwC, which means that a third party will be involved in handling the complaint.

All types of **serious misconduct** in our operations or within the organisation must be reported to the whistleblower function. This can include things that affect the health and lives of individuals, major security breaches or various forms of discrimination or harassment. It can also include bribery, corruption or financial crime. If you are the victim of something or have suspicions of wrongdoing of this kind, you should always report it via the whistleblowing function.

The report is made directly to the audit firm PwC, as per the contact details below. As soon as the report is made, an initial investigation will be carried out by the whistleblower team at the Swedish Red Cross. It consists of Board representatives (appointed by the Board) and senior management (appointed by the Secretary General). The group will decide how to proceed

with the case. You will receive feedback confirming that the notification has been received and how the case will be handled within two weeks.

You can make your notification anonymously, by letter, but in this case no feedback can be given.

How to report via the whistleblower function:

E-mail: redcross@claimdesk.pwc.se

Letter: Claimdesk

PricewaterhouseCooper AB

113 97 Stockholm

Further information about the whistleblower function can be found in the Swedish Red Cross' Code of Conduct.³

2.4 Specifics on how to complain as a patient or family member

In accordance with Chapter 11, §2 of the Patients Act, the Health and Care Department has procedures for how complaints and comments about the Swedish Red Cross's professional care activities should be received and handled.

If you, or someone close to you, has experienced something in contact with our healthcare services that you are not satisfied with, we recommend that you contact the centre or clinic where you received the care directly in the first instance. They are obliged to receive and respond to your complaints and comments.

You can also send your comments by e-mail to: tyckomvarden@redcross.se

Your email will be handled by the manager concerned and the person in charge of quality development in the Health and Care Department. Once you have made a comment or complaint about the health service, you will receive a reply to your case as soon as possible, usually within three to four weeks.

If you would like more support, you can contact the Patient Council, which provides support and assistance to patients who have comments or complaints about healthcare.

3 The Swedish Red Cross' internal routine for the handling of complaints in detail

The Swedish Red Cross defines different types of complaints that may require different types of actions. Different types of complaints may also partly overlapping, something that goes against our Code of Conduct can for example also be a violation of Swedish law. The key is that irregularities, crimes or suspicions of crimes, are brought to our attention, investigated and dealt with.

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 $^{^3\} Uppf\"{o}randekoden: \ \underline{https://www.rodakorset.se/globalassets/rodakorset.se/dokument/om-oss/svenska-rodakorsets-uppforandekod.pdf}$

As set out in section 2, different types of complaints and concerns may come to light in different ways. Fundamentally, a person making a complaint to the Swedish Red Cross should not need to know the structure of the organisation or what type of complaint it is, but it is important that those receiving complaints within the organisation have a common understanding of what type(s) of crime it may be.

In general, we divide complaints into five different groups:

- 1. Complaints and suspicions of violations of the law, or other irregularities
- 2. Complaints and suspected breaches of the Code of Conduct
- 3. Complaints and suspected breaches of the Association's statutes
- 4. Complaints about our activities and the Association in various forms
- 5. Complaints from patients in our healthcare activities

This section provides an in-depth look at how the Swedish Red Cross handles various complaints and what the sanctions are for the various violations.

3.1 In the case of violations of the law, or other irregularities

If someone suspects a crime, a police report should always be made. We urge anyone with information to make the report themselves or to contact the Swedish Red Cross (through Info service) for help in filing a police report.

As an employer, the Swedish Red Cross takes it very seriously when employees commit crimes within the scope of their assignment. Police reports of crimes related to the workplace may be made if there is factual evidence that a criminal act may have been committed. However, as an employer, the Swedish Red Cross nor our charters are not legally obliged to make a police report. If the employer reports the crime to the police, it is assumed that the employee who has been the victim of the crime is prepared to cooperate in the police investigation, so it is important that the victim is always consulted before the employer reports the crime to the police.

If you, as a manager, are contacted by an employee who has been the victim of a crime in the workplace, you should quickly contact HR and arrange a meeting with the victim. If you, as a manager, have been singled out or are otherwise part of the situation yourself, your manager will take responsibility for the case in dialogue with HR. If an investigation is launched and disciplinary action is taken, HR has overall responsibility.

More information about this can be found in the Swedish Red Cross Manager's Handbook⁴ at Rednet.

3.2 In the case of threats against you as a Red Cross worker

In the event of an incident that poses a threat to personal safety, the branch board or immediate supervisor must always be informed. Depending on the type of incident, the Labour Inspectorate, the Insurance Fund and/or the police should be contacted. The district

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⁴ The Swedish Red Cross Manager's Handbook: <u>https://kunskapsbanken.rodakorset.se/hc/sv/articles/360004429038-Välkommen-till-chefshandboken-</u>

board or your manager is responsible for ensuring that the matter is handled properly and should offer you support and advice if you have been threatened.

In the event of a serious threat, those responsible for internal security management within the service personnel organisation will decide whether further action may need to be taken. This may include involving our security partners, as well as following up on how the person who has received the threat feels and experiences the situation.

All threats against individual staff or volunteers and the Swedish Red Cross as an organisation must be reported using a special incident reporting form⁵ and sent to incident@redcross.se and/or info@redcross.se.

3.3 In the case of complaints about suspected breaches of the Code of Conduct

The Code of Conduct⁶ covers those who are elected, employed, delegate, volunteer, intern, student, consultant, fee-paying or who have undertaken another mission for the Swedish red Cross in Sweden and/or abroad. These are referred to as Everyone engaged with the Red Cross.

The 12 points of the Code of Conduct set a minimum standard for how everyone engaged with the Red Cross should behave. As a Red Cross worker, it is your duty to know, understand and abide by our basic principles and statutes, and to keep yourself well informed about the current policies and guidelines. Anyone who fails to comply with the Code of Conduct will be sanctioned, which should be proportionate to the nature of the offence.

3.4 In case of breaches of the statutes and exclusion of members

According to the statutes of the Swedish Red Cross, members who violate the statutes may be excluded for violations of §§ 1-3 of the statutes, for mismanagement of financial affairs, for violation of the Code of Conduct or for otherwise exceeding their powers.

Exclusion of a member is initiated by the Board of the Swedish Red Cross, the board of the local branch or another member. The decision to exclude a member is taken by the board of the local branch to which the member belongs or, in the case of a member who does not belong to a local branch, by the board of the Swedish Red Cross.

More information on breaches of statutes and exclusion of members can be found in the Statutes of the Swedish Red Cross (2020-01-01)⁷ and the Statutes' implementing regulations (adopted by the Board of the Swedish Red Cross 2020-02-21).

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⁵ Incident report form: https://kunskapsbanken.rodakorset.se/hc/article_attachments/360004882937/Blankett_Incidentrapportering_v5.pdf

⁶ The Code of Conduct: https://kunskapsbanken.rodakorset.se/hc/sv/articles/360003829417-Uppförandekod
⁷the Statutes of the Swedish Red Cross: https://kunskapsbanken.rodakorset.se/hc/sv/articles/360003842557-Stadgar

3.5 In case of complaints about our activities and association in various forms If complaints are received about the way the Swedish Red Cross' activities and association are conducted, the legal and practical responsibility lies with the organisational unit that conducts the activities. As mentioned in section 2.2, this may involve complaints that our basic guiding principles do not permeate our treatment and attitude. Generally, this is a complaint that does not have legal implications; it is not usually about a breach of the law or our Code of Conduct.

However, it is important that we capture these complaints, which can come from within the Swedish Red Cross as well as from external actors and individuals who have come into contact with our activities. The concerned or association or activity must be made aware of the complaint as soon as possible and take action. Support through the available information on the intranet shall be given to local circles. Advice may also be given to the person responsible.

3.6 Specific information on the Follow-up Committee

Some of the complaints received by the Swedish Red Cross may also be dealt with by the Follow-up Committee. This committee is established by the board of the Swedish Red Cross to minimise the risk of negative events occurring within the framework of, and by decision of, the branch organisation, regional council or national board, and to ensure that appropriate action at the right level is taken if something does occur. The Follow-up Committee is not responsible for assessing and acting of whistleblowing or violations within the Swedish Red Cross service organisation.

The rules of procedure⁸ of the Follow-up Committee are decided by the board of the Swedish Red Cross and they define the tasks of the Committee, which in brief are *to provide guidance*, *to propose actions* on various matters to the board, and to decide on specific issues.

4 To handle complaints within the branch

As stated in this guideline, sometimes complaints are made against an activity or person active within a branch. Sometimes complaints come from the outside, sometimes it is the branch itself that has identified shortcomings. In many cases, the branch can handle this themselves, but in some cases, it is important that the Swedish Red Cross service staff organisation is also made aware of the matter. This is to be able to provide good support to the branch, to ensure that the matter is handled in a qualitative manner and to have an overall picture of the complaints made against the Swedish Red Cross.

We distinguish between two different types of situations that can arise in a branch; branch incidents and branch dilemmas.

Branch incident – an individual incident where a branch or volunteers/trustee violates the statutes, Code of Conduct or guidelines, mismanagement of the association that *does not* risk

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⁸ The rules of procedure of the Follow-up Committee: https://kunskapsbanken.rodakorset.se/hc/sv/articles/360003513297-Svenska-Röda-Korsets-styrelse

affecting the reputation of the Swedish Red Cross outside the organisation. The incident is of a simple nature and can be solved within the branch or with the support of the regional council. If a branch incident occurs, Info Service may be contacted for support and advice, and to enable the Swedish Red Cross to have a better overview of the incidents that occur in branches and thus work more preventively.

Branch dilemma – an event where the branch board and regional council cannot handle the problem themselves and where there is a risk that the reputation of the Swedish Red Cross will be negatively affected. A special situation that requires a greater effort/decision by the service organisation. If a branch dilemma has arisen, Info Service should always be contacted.

Suspicions of serious misconduct can also be reported directly by the branch to the whistleblowing function (see section 2.3).

If you have been the victim of a crime or suspect a violation of the law, you should always report it to the police. You can either file a police report yourself or give information to someone at the Swedish Red Cross who can then help you file a report.

If you would like support with your report, please contact Info Service as indicated below.

4.1 Where do I send my report?

The branch should first contact Info Service if they wish to file a violation or complaint report

E-mail: <u>info@redcross.se</u>

Phone: 0771–19 95 00 (all weekdays 10.00–12.00 and 13.00–16.00)

Letter: Infoservice

Svenska Röda Korset

Hornsgatan 54 / Box 17563

118 91 Stockholm

Those units that provide direct branch support can also make their own assessment of cases reported from or detected in a branch. These units are also advised to send the case to Info Service to ensure consistency of handling and to get an overall picture of the complaints made so that we can learn and improve.

4.2 What happens to cases reported of the branch?

When a case about a branch is received by Info Service, an assessment is made of the seriousness of the case. Some of the criteria used in the assessment are the risk of damage to reputation, the complexity of the case and whether the branch appears to be able to handle the case itself. Depending on the above criteria, the case is referred to as a branch incident or a branch dilemma.

If a case is assessed to be a branch dilemma, it is sent to the Resource Group. The Resource Group consists of representatives from the following departments: Branch Fundraising and Second Hand, Association and Capacity, HR, Info Service, Finance, Communication and Local and Regional Development. An action plan is drawn up together with the branch

concerned and the regional council to deal with the matter, which is then followed up regularly.

Staff handling these cases must follow the internal procedure for handling branch dilemmas.