



Netherlands Advisory Board on impact investing

COMPLAINTS POLICY

(v. approved Board 26/5/2023)

1 Our aim

The Netherlands Advisory Board on impact investing (NAB), as an ANBI-status foundation, is committed to providing quality activities for the greater good and working in an open and accountable way that builds trust and respect. To achieve high quality, the NAB strives to meet and even surpass the expectations of its stakeholders, i.e., the NAB members, partners, donors, impact investing stakeholders, staff members and the broader public.

One of the ways in which we can continue to improve our service is by listening and responding to the views of our partners and stakeholders, and in particular by responding to complaints, and by putting mistakes right.

Therefore, we aim to ensure that:

- making a compliment or complaint is as easy as possible
- we welcome feedback and suggestions
- we treat a complaint as a clear expression of dissatisfaction with our service which calls for an immediate response
- we deal with it promptly, politely and, when appropriate, confidentially
- we respond in the right way - for example, with an explanation, or an apology where we have got things wrong, or information on any action taken, etc.
- we learn from formal complaints by keeping a record of them, use them to improve our functioning, and review regularly our complaints policy

We recognise that most concerns might be raised informally and dealt with on the spot.

Our aims are to:

- resolve informal concerns quickly
- keep matters low-key
- enable mediation between the Complainant and the individual to whom the complaint has been referred

This policy ensures that we welcome feedback and provide guidelines for dealing with complaints from members of the public about our activities and Staff members. All Staff members involved in the Complaint handling process are responsible for familiarizing themselves with the provisions of this policy and for ensuring a fair and professional treatment of Complainants when dealing with their dissatisfaction.

1.1 Obligation to report

All the NAB Staff members (as per definition, this refers to, but is not limited to, all permanent and temporary employees, interns, contracted consultants, volunteers, and all individuals working for or representing the NAB) are obligated to report allegations, concerns or suspicions of breaches related to the NAB Code of Conduct. Proven deliberate nonreporting may lead to disciplinary action.

2. Definitions

“Board” refers to the NAB’s Board of Directors. The Board of Directors is composed of volunteers.

“Compliment” is an expression of satisfaction about the activities we deliver.

“Complainant” refers to a natural or legal person who is presumed to be eligible to have a Complaint considered by the NAB under the provision of this policy.

“Complaint” is defined as any expression of dissatisfaction; in whatever way it is expressed. This would include complaints expressed face to face, via a phone call, in writing, via email or any other method. All employees should have sufficient knowledge to be able to identify an “expression of dissatisfaction” even when the word “complain” or “complaint” is not used.

“Complaints Procedure” a framework that describes the course of action for receiving and processing allegations. This includes the system for processing complaints within the organisation, as well as procedures for beneficiaries to bring complaints forward.

“Confidential Counsellor” means a trust person appointed within the NAB Board, tasked with preventing, managing and helping to solve cases of discrimination, sexual harassment, moral or psychological harassment, mobbing and straining in the workplace. Beyond 10 employees, an independent Confidential Counsellor will be hired. The Confidential Counsellor is also involved in the Whistle Blowing procedure.

“Consultant” means any person who has a contracted part-time or full-time, project-based relationship with the NAB.

“Employee” means any person who has a part-time, full-time, intermittent, continuous, or fixed-term employment or consultancy relationship with the NAB.

“Incident” is defined as a work-related health, safety, security or environmental event which results in, or has the potential to result in, an undesired outcome

“NAB” refers to the Netherland Advisory Board on impact investing.

“Sexual Exploitation” is a term used to describe any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

“Staff members” represent all employees, volunteers, contracted consultants working for the NAB.

“Volunteer” means any person who has a part-time, full-time, intermittent, continuous, or fixed-term

volunteer relationship with the NAB, contracted or not.

3. Purpose

We always welcome feedback from people who are satisfied or dissatisfied with our activities or Staff members. All formal, i.e. written, feedback is recorded, acknowledged, and a copy is sent to the relevant employee to provide feedback. Informal feedback is simply acknowledged.

4. Complaints

The formal complaints procedure is intended to ensure that all complaints are handled fairly, consistently and wherever possible resolved to the Complainant's satisfaction.

4.1 Anonymous complaints

The NAB recognises that at times people with genuine concerns cannot speak out because of special circumstances and may wish to lodge a Complaint with about an employee without revealing their identity to a wider audience. This is why the NAB also accepts anonymous complaints and will deal with them seriously because of the potential for future abuse and harm. Every possible effort will be made to address the Complaint when there is sufficient information to look into the allegation. However, the NAB is also conscious of potential manipulation of complaints for political or personal purposes. Therefore, anonymous complaints should include as much information and details as possible to allow further preliminary inquiries. If insufficient information has been shared, the NAB will not be able to deal with such anonymous complaints. Anonymous Complainants need to be as well aware of the NAB's inability for giving feedback in such cases.

5. Responsibilities

The NAB's responsibility will be to:

- acknowledge the formal complaint in writing;
- respond within a period of time of no more than 2 weeks;
- deal reasonably and sensitively with the complaint; and
- take action where appropriate.

A Complainant's responsibility is to:

- bring their complaint, in writing, to the NAB's attention normally within 8 weeks of the issue arising;
- raise concerns promptly and directly with the Complaints officer (normally the Managing Director) of the NAB;
- explain the problem as clearly and as fully as possible, including any action taken to date;
- allow the NAB a reasonable time to deal with the matter; and
- recognise that some circumstances may be beyond the NAB's control.

6. Confidentiality

Except in exceptional circumstances, every attempt will be made to ensure that both the Complainant and the NAB maintain confidentiality. However, the circumstances giving rise to the Complaint may be such that it may not be possible to maintain confidentiality (with each complaint judged on its own facts).

The NAB shall only allow disclosure when:

- it is required by law;
- it is required by the Managing Director or the Board in the best interests of the organisation and the parties;
- it is a breach of national and/or international law.

7. Complaints Procedure

7.1 Who can complain

Complaints can be lodged by all NAB stakeholders, including communities with whom the NAB works, NAB members, partners, donors, Staff members and the public. Complaints can only concern NAB activities, and not activities of third-parties or NAB stakeholders beyond the NAB's control.

7.2 When to complain

A complaint should ideally be lodged as soon as possible after the Complainant becomes aware of the concern, in order to maximise the effectiveness of any potential investigation. However, and considering the barriers and difficulties for reporting, the Managing Director and the Board are willing to accept complaints at any time.

7.3 How to complain

Stage 1 – The Complaint addressing

In the first instance, the Managing Director must be informed and will establish the seriousness of the Complaint.

If the Complaint concerns the Managing Director, then the escalated complaints procedure should be followed. If a resolution of the issue is not possible at an early stage, and/or the Complainant remains dissatisfied with the way the matter was initially addressed, then the case is escalated to the Confidential Counsellor, who will formally deal with it.

Stage 2 – Complaint Handling procedure

A resolution of the Complaint by the Managing Director is the most appropriate when it can be achieved. If the Complaint cannot be resolved by the Managing Director, the Complainant will be advised that a formal complaint may be made to the Confidential Counsellor, and the following procedure should be explained to them by the Managing Director.

A formal complaint must be made in writing. Complaints must be addressed to the NAB using a letter or email. Complaints made by telephone or in a meeting must be confirmed in writing/by email. It is

important to include as much information as possible on the identities of the subject of Complaint, the organisation and the potential witnesses. Except in the case of an anonymous complaint, contact information of the Complainant needs to be given for further communication and investigations.

The Confidential Counsellor will be informed about a formal Complaint within 2 working days, or as soon as feasible.

For the Complaint to have merit, it needs to contain at least:

1. The name and the address of the Complainant
2. The date of the communication
3. A description of the event to which the Complaint relates
4. A signature

The description of the grievance must be sufficient, in the opinion of the Managing Director dealing with the Complaint, so as to enable a proper consideration and analysis of the facts. The NAB has the right not to consider a Complaint that has not been submitted in accordance with these requirements after repeated (2 reminders) requests to the Complainant to do so.

The NAB is not required to consider the Complaint if it relates to an action that took place more than three years prior to the submission of the Complaint. As soon as possible (and no later than within four weeks of receipt of the Complaint) the NAB will notify the Complainant that the Complaint will not be considered.

Please refer to the sample complaints letter format in Annex 1 at the end of this document. This should serve as a guide and can be adapted as appropriate. When the details have been completed, it should be sent by letter or email to the following contacts:

- By letter, addressed to:

NAB Netherlands Advisory Board on impact investing

Managing Director

Saturnusstraat 14

2516AH Den Haag

Netherlands

- By email, to the Managing Director: contact@nabimpactinvesting.nl

Or for the escalation process:

- By letter, addressed to:

NAB Netherlands Advisory Board on impact investing

Confidential Counsellor

Saturnusstraat 14

2516AH Den Haag

Netherlands

- By email, to the Confidential Counsellor: complaints@nabimpactinvesting.nl

English and Dutch are the preferred languages for receiving and dealing with complaints. If Complainants are unable to communicate in these languages, the NAB will also accept complaints written in other languages. However, the process for dealing with such a complaint might take longer.

Stage 3 – Handling and closing the Complaint

The Complaint must be addressed to the Managing Director. In the event of a complaint about the Managing Director or unsatisfactory resolution of the Complaint, the Complaint will be handled by the Confidential Counsellor.

The Managing Director or the Confidential Counsellor, depending on the nature of the Complaint, must acknowledge the complaint in writing within one week of receiving it.

One of the above will investigate the Complaint. Any conclusions reached should be discussed with the Staff member(s) involved, if any.

As soon as a decision has been made, the Managing Director or the Confidential Counsellor will inform the Complainant in writing about NAB's position, as well as the reasoning for the position taken by the NAB with regard to the Complaint. This written final response will:

1. Summarise the relevant facts, findings, and conclusions, stating whether the case has been upheld;
2. State whether it is considered appropriate to include a remedial action or some form of redress, including details of how the redress will be implemented;
3. Provide details on how an alternative dispute resolution can be obtained.

The person making the Complaint will receive a response based on the investigation within two weeks of the Complaint being received. If this is not possible then a letter must be sent explaining why.

If the Complainant is still not satisfied with the decision, then a sub-group of the Board of Directors will be convened.

The sub-group will examine the Complaint and may wish to carry out further interviews, examine files/notes. They will respond within four weeks in writing. Their decision will be final.

If, following this additional attempt to address the case, the disagreement still stands, then the Complainant is informed of their right to escalate the case further in a civil court.

Stage 4 – Record keeping

The Managing Director keeps a record of the Complaints received and the measures taken for their resolution. All relevant details are saved in a Compliance folder in the private NAB SharePoint with access limited to the Managing Director and the Confidential Counsellor. The complaints record include:

- The Complainant's personal information, to the extent this is relevant
- Date on which the Complaint was made
- Description of the Complaint
- When and how the Complaint was resolved
- Related correspondence and communications
- Status of the Complaint (in progress/resolved)
- Whether remedial actions followed the investigation of the Complaint

The complaint record and corresponding files will be kept in the Compliance folder for at least one year after the Complaint has been dealt with. This section of the Compliance folder is accessible only by the Managing Director and the Confidential Counsellor.

The Confidential Counsellor reports to the Board about all complaints received and processed at least once per year.

Review of the policy

The Managing Director and the Confidential Counsellor will review this Complaints policy regularly or on an ad hoc basis if this is required due to regulatory requirements and changes in laws, guidance from supervisors, relevant applicable guidelines are published, incidents or breaches happen so to request a change to this policy, otherwise if it's deemed necessary to align the NAB approach to complaints management to best practices in the industry.

The Managing Director and the Confidential Counsellor will submit the revised version of this policy to the Board for final approval. Once this is done, the new policy is circulated across the relevant employees and, if required, training and other awareness initiatives are organized to address substantial changes in the policy and in its application.

Annex 1 - Sample of the complaints letter

This form should be completed (or adapted) by the person or organisation wishing to lodge a complaint.

(All 'sensitive' complaints related to sexual exploitation and abuse, fraud and corruption and misconduct will be held securely and handled strictly in line with applicable confidentiality, reporting and investigation procedures.)

A: General data

1. Name of the person or organisation lodging the complaint

 Male/Female _____ Age _____

2. Address:

Tel: _____ Email: _____

3. Name of the person or organisation you wish to lodge a complaint against (if known):

 4. Date of incident _____ Time of incident _____

5. Place of incident _____

6. Date of report _____

B: Brief description of the incident or concern

C: Name of witnesses (if any/ and if relevant) Supply the names of witnesses and where they can be contacted, if known:

D: Describe action taken. If this is a complaint related to sexual exploitation and abuse, please provide detailed information regarding what medical assistance has been provided, what psychosocial care has been provided and whether a report has been made to the Police.

E: State what kind of response you expect from the NAB and how you wish to see the matter resolved

Name: _____

Signature _____

Date: _____