



Complaint Response Mechanism Policy

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Organizational Profile

Bargad is a youth development organization actively working to promote peace, justice and cooperation amongst the youth¹ in Pakistan. The organization has focused on creating opportunities and amplifying the voices of the youth ever since its inception in 1997, leading to a vast network of around 3000 youth volunteers, known as the Bargad Volunteer Network (BVN) throughout the country.

Bargad's Vision:

Politically, socially and economically empowered youth and women respect, protect and promote peace and harmony

Bargad's Mission:

1. Engage vulnerable youth and women in all diversity to their full potential through education, mentorship and innovative interventions designed to enhance their overall well-being.
2. To invest in youth-led and youth-centred ideas, to convene key stakeholders in the sector and advocate for systems and policy changes that meet youths' needs.
3. Engage youth to end violence against women.

Bargad has implemented more than 100 projects on youth training², youth mobilization and policy advocacy, including the provision of technical assistance to all the provincial governments of Pakistan, regions of Gilgit-Baltistan and the State of Azad Jammu Kashmir (AJK) for the formulation of their respective youth policies. These policies have been approved by the provincial governments of Punjab (2012), Khyber Pakhtunkhwa (2016) and Sindh (2018), and Balochistan (2024) resulting in governments' pledges to allocate 4% budget to sports and youth affairs, 15% on the women employment quota, implementation of the E-Rozgar programs, and on youth participation in the local governments, respectively. Bargad has also conducted Capacity Enhancement workshops on youth development with officials of the youth affairs departments of Punjab, Balochistan and Sindh.

Bargad has a youth network of 782 individuals, civil society organizations and government institutions, with Youth engagements with 64 Universities, 40 Colleges and 35 Higher Secondary Schools.

The organization has previously partnered with 26 membership based student organizations and 15 Youth Groups over Pakistan; producing the largest pool of researches and publications on various aspects of youth than any other civil society organization in Pakistan, while also pioneering a youth track of peace and diplomacy in the South Asian region.

The hallmark of the organization is that its core youth volunteers participate in all aspects of the projects - from action-planning to project execution, while also mapping in the course of its work; issues as well as challenges identified by the youth across the country³.

¹ Adolescents: 12-19; Youth age bracket in Pakistan: 15-29

² Since 2003, the organization has trained 7880 youth activists and young faculty only through training workshops and peer sessions in issues of social development.

³ The Youth in the mapping is part of the Youth Cohorts in the districts where Bargad has actively worked or is presently working.

Purpose

The purpose of this complaints policy is to set out the guiding principles and parameters for lodging or reporting a complaint and the manner in which Bargad receives and handles complaints that fall within the scope of this Policy. This Policy is applicable to all Bargad staff, volunteers, Board members and contractual employees/ consultants, and beneficiaries. Within Bargad, the objectives of this Policy are to ensure that the commensurate processes reflect the importance and value of listening and responding to concerns and Complaints received.

Scope

This policy applies to Bargad and is national in its application. A complaint can be made by any staff member, member of the Bargad Board of Directors, member of Bargad General Body, partner organization, community or individual with whom we work, or any member of the public, whether an individual, company or other entity.

Definitions

A complaint is an expression of dissatisfaction about the standards of service, actions or lack of action by Bargad or its staff and associated personnel. It is a criticism that expects a reply and would like things to be changed through necessary corrective measures.

Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery
- Concern about the behaviour of staff or associated personnel
- Concern about the office environment not being inclusive
- Any act of harassment or gender discrimination by a staff member towards another (or a volunteer)

There are two categories that Bargad will divide its complaints into:

1. Operational
These include complains about procedures, logistics and other such operations related activities.
2. Sensitive
 - a. Sensitive Sexual Exploitation Abuse and Harassment (SEAH)
 - b. Sensitive (Non-SEAH) – Fraud, Allegations, Staff or volunteers for various misconduct
 - c. Related to safeguarding of children or adults

A complaint has to be about some action for which Bargad is responsible or is within our sphere of influence.

A complaint is not:

- A general inquiry about Bargad's work
- A request for information
- A contractual dispute
- A request to amend records e.g. to correct an address

Committee Formation

The Safeguarding Committee shall consist of three members: one representative from the Bargad team from the Program Department, one from the MEAL Department, and one representative from the Board of Directors. The participation of a Board member is intended to ensure independent oversight, enhance transparency, and reinforce the fairness and accountability of the Committee's decisions and proceedings.

Procedures for making a complaint

It is hoped that most complaints or concerns about Bargad's work or behaviour can and will be dealt with informally by staff or volunteers. However, it is recognized that not all issues can be resolved in this way and that a formal complaints mechanism is required for those occasions when an individual wishes to make their complaint a matter of record and to receive a formal response.

The procedure for making a complaint will be printed and publicized within office premises. In case of any outdoor activities/ events a standee/ poster shall serve the purpose.

How to make a complaint?

All formal complaints should be made in writing (e-mail or paper) directly from the individual or via someone acting on their behalf. See below for details about to whom to address a complaint:

Secretary of the Complaints Resolution Committee: Operations Coordinator

17/18, Block N, Gulberg II, Lahore

Tel: 0092-42-35779030/35779031

Complaints can also be made in-person to the secretary and using a complaint box inside the office premises. The complaint box will be reviewed at the end of every week by the Secretary.

The complaint box must be placed in a common place which is accessible to everyone.

If a complaint is made to some other senior member within the Bargad team, they are responsible for lodging it officially with the secretary or the committee member in a written format within a week of receiving the complaint.

Who can make a complaint?

This policy is national in application.

A complaint can be made by:

- Any donor
- Partner organization
- Staff member

- Board member
- Community or individual with whom we work
- Any member of the public whether an individual, company or other entity

Complaint handling

For all Complaints we will:

- I. Seek from the Complainant the outcome(s) they are expecting;
- II. Make an initial assessment of the severity of the Complaint (what category the complaint falls into) and the urgency of action;
- III. Clearly explain to the Complainant the course of action that will follow:
 - a. if the Complaint is out of our jurisdiction;
 - b. if we may exercise a discretion not to investigate;
 - c. if preliminary enquiries need to be made, or further consideration needs to be given; or
 - d. if the Complaint is to be investigated.
- IV. We will not create false expectations, but assure the Complainant that the Complaint will receive full attention;
- V. Give an estimated timeframe or, if that is not possible, a date by which we will contact them again;
- VI. Check whether the Complainant is satisfied with the proposed action and, if not, advise them of alternatives that could be through external sources or legal action;
- VII. Ensure that the Complaint is appropriately acknowledged;
- VIII. Follow up where necessary, and monitor whether the Complainant is satisfied;
- IX. Register all Complaints

Investigating Complaints

We will make every reasonable effort to investigate all relevant circumstances and information surrounding a Complaint. The level of investigation will be commensurate with the seriousness and frequency of the Complaint.

Any complaint concerning a member of the Board of Directors (BOD) or the General Body shall be forwarded to the Membership Review Committee within the Board for review and appropriate action.

If the complaint involves a General Body member or a Board member during a Bargad event and the matter is considered minor, it may be resolved on the spot by the delegated Complaint Resolution Committee in accordance with the organization's complaint handling procedures.

However, serious matters, including but not limited to harassment, misconduct, or cases that may warrant suspension or removal of membership, shall not be resolved at the event level. Such cases must be referred to the Membership Review Committee for formal investigation and decision-making.

Timeframes

- Best endeavors will be taken to acknowledge written Complaints within five business days of receipt.
- We will acknowledge verbal Complaints immediately.
- We will aim to resolve all operational Complaints as quickly as possible and within 30 business days unless there are exceptional circumstances.
- In case of sensitive complaints, the processing time will be as quick as one week in case of SEAH and 2 weeks in case of non-SEAH.

- If any Complaint is not resolved within 30 business days, we will inform the Complainant and keep them informed of its progress regularly.

Responding and closing a complaint

- We will communicate our decision on a Complaint as soon as is practicable. Our communication will be in writing in the appropriate language by email and/or post, and/or verbally where appropriate.
- We will encourage the Complainant to respond and advise whether or not they are satisfied with our decision.
- In our decision we will advise that if a Complainant is not satisfied, we will be prepared to consider any additional information they may provide and to review our decision.

Special Situations

In case a staff member has faced an issue during field work or any other such third-party interaction that would be considered a special situation. In such a situation where the staff member may register its complaint in the aforementioned format but the penalty for the third party shall be decided according to the situation. The discretion of the penalty lies with the Inquiry committee.

- If there is a complaint against a vendor, the penalty could be an end of the transaction and blacklisting that vendor from future dealing.
- If the complaint is of a student/ volunteer then their respective university/ college administration could be involved.
- If the complaint of harassment then it could warrant legal action.
- This is not an exhaustive list but mere examples of how the committee could choose to act in a given context.

Accessibility, Safety & Anonymity

No detriment to people raising concerns/making complaints: We work to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous concerns/complaints: We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility: We will ensure that information about how and where concerns or complaints may be raised to or about us is well publicized. We will ensure that our systems to manage this information are easily understood and accessible to everyone. If a person prefers or needs another person or to assist or represent them in the making and/ or resolution of their concerns/complaint, we will communicate with them through their representative if this is their wish.

Confidentiality: information related to a complaint is only shared on a need-to-know basis among those directly handling or overseeing the complaint. As a general rule, names or personal details of those individuals involved will not be shared. If it is necessary to disclose information to 3rd parties this is decided on a case-by-case basis and, as far as possible, with the agreement of the person who has raised the complaint, except in cases of criminal activity.

Complaints of Harassment, Safeguarding or Conflict of Interest Matters

Complaints received by Bargad may relate to harassment, gender-based discrimination, safeguarding concerns, conflict of interest matters, or other issues covered under the organization's policies.

Where a complaint relates to harassment or gender-based discrimination, it shall be handled in accordance with the provisions of **The Protection against Harassment of Women at the Workplace Act, 2010**. Bargad's Anti-Harassment Policy and Gender Discrimination Policy may also be referred to for guidance. However, as prescribed under the Act, the statutory redressal mechanism shall apply in such cases.

Complaints relating to safeguarding, conflict of interest, or other matters covered under the organization's policies shall be addressed in accordance with the relevant internal policies and procedures through the designated Safeguarding Committee.

If a complaint of any of the above nature is submitted to the Executive Director (ED), the ED shall be responsible for convening the Inquiry Committee or the Safeguarding Committee, as applicable. If the complaint is submitted to any other member of the relevant committee instead of the ED, it shall be considered equally valid, and the same complaint handling procedure shall be followed in accordance with the applicable policy.

Procedure for holding an Inquiry

The Inquiry Committee, within three days of receipt of a written complaint, shall—

- (a) communicate to the accused the charges and statement of allegations levelled against him/her, the formal written receipt of which will be given;
- (b) require the accused within seven days from the day the charge is communicated to him to submit a written defense and on his failure to do so without reasonable cause, the Committee shall proceed ex-parte⁴; and
- (c) enquire into the charge and may examine such oral or documentary evidence in support of the charge or in defence of the accused as the Committee may consider necessary, and each party shall be entitled to cross-examine the witnesses against him/her.

Harassment Inquiry Committee

The Harassment Inquiry Committee shall comprise two Bargad staff members and one member of the Board. Bargad shall designate a Secretary to receive and record all complaints. Complaints concerning Board members shall be referred to the Board's Membership Review Committee, while complaints related to harassment, sexual harassment, safeguarding, or other protection concerns shall be referred to the Complaint Mechanism Committee for investigation and appropriate action in accordance with the applicable policies and procedures.

The Harassment Inquiry Committee shall submit its findings and recommendations to the ED within thirty days of the initiation of inquiry. If the Harassment Inquiry Committee finds the accused to be guilty it shall recommend to the ED for imposing one or more of the following penalties

1. Minor penalties:
 - i) censure;
 - ii) withholding, for a specific period, promotion or increment;
 - iii) recovery of the compensation payable to the complainant from pay or any other source of the accused;
2. Major penalties:

⁴ on or from one side or party on Harassment the y

- i) reduction to a lower post
- ii) compulsory retirement;
- iii) removal from service;
- iv) Fine. A part of the fine can be used as compensation for the complainant.

The ED shall impose the penalty recommended by the Harassment Inquiry Committee within one week of the receipt of the recommendations of the Harassment Inquiry Committee. The Committee shall meet bi-monthly and monitor the situation regularly until they are satisfied that their recommendations are subject to decision.

In case the complainant is in trauma, Bargad will arrange for psycho-social counseling or medical treatment and for additional medical leave. Bargad may⁵ also offer compensation to the complainant in case of loss of salary or other damages.

False complaints and appeal

If a complaint is made with malicious intent and the inquiry committee finds it to be a false allegation, then the committee can make a recommendation for a penalty for the said complainant to the ED. The penalties can be minor or major, as listed above.

In case the accused wants to challenge the result of the investigation, they will have one week to file an appeal with the committee. If the accused presents the committee with any additional information/evidence, the committee will choose to reopen the investigation or not.

Ombudsperson

In case of a sensitive complaint (SEAH) if the complainant is unsatisfied with the outcome or if the accused wants to make an appeal against the decision, they can take their matter directly to the office of the Ombudsperson who will look into the matter as per The Protection against Harassment of Women at the Workplace Act, 2010.

Related Documents to this Policy

- 1) Code of Conduct
- 2) Anti-Harassment Policy
- 3) Gender Discrimination Policy
- 4) Safeguarding Children and Vulnerable Adults Policy
- 5) Diversity Policy
- 6) Preventing Sexual Exploitation & Abuse Policy

⁵ Discretion of the ED, could be suggested by the Inquiry Committee

Harassment Inquiry Committee- Terms of Reference (TORs)

Mandate/ Purpose:

The Harassment Inquiry Committee is a committee which holds hearings on matters pertaining to this policy and takes disciplinary decisions about the conduct of investigated members.

Composition:

The Harassment Inquiry Committee will be comprised of:

1. At least three (3) people excluding the ED.
2. At least one (1) of these 3 will be a member of the board, one (1) will be a member of the MEAL Department and one (1) from the Program Department.
3. At least one (1) will be a woman

The Committee's appointment shall be proposed by the ED but it will need the approval of the Board of Directors.

Term:

- Members of the Harassment Inquiry Committee shall be appointed for a two-year term. No more than two consecutive terms are permitted.
- If the term of a member of the Committee expires during the course of a inquiry hearing, that individual shall continue to be a member of the Harassment Inquiry Committee and shall be entitled to participate in any inquiry hearing to which that individual was a duly appointed member immediately before the expiry of his or her term. The term of the member continues until a final decision in that inquiry hearing is made.
- An individual's term may be extended to the committee immediately following the expiration of their term as determined by the Board of Directors.

Quorum:

Quorum is ALL members of the Committee.

Authority and Reporting:

The Harassment Inquiry Committee is independent and reports its findings only to the ED.

Meeting Schedule:

Hearings will be as scheduled according to the nature of the complaint as listed in the policy.

Staff Support:

The Harassment Inquiry Committee is provided with administrative support by all members of the Bargad Team as required.

Complaints Mechanism: Flow Chart

