

## GENERAL COMPLAINTS PROCEDURE & COMMITMENT TO SAFEGUARDING

SEARRP is committed to creating and maintaining a safeguarded environment for our staff, the scientists and students who work with us, trainees on courses we run or facilitate and any children or vulnerable adults with whom we may engage. We actively promote a safe, caring, tolerant and rewarding environment for everyone working for or with SEARRP - including those of partner organisations that engage with our programme or visit research sites where we operate.

This *General Complaints Procedure* forms an essential component of our safeguarding framework, which includes a *Sexual Harassment Policy*, *Whistle-blower Policy*, *Employee Code of Conduct* and *Cultural Guidance* for visiting scientists and students. These policies and procedures are intended to ensure that everyone is treated professionally and respectfully, in line with our duty-of-care to protect the safety and welfare of anyone working for or engaging with SEARRP.

### SCOPE OF THIS PROCEDURE

This document outlines SEARRP's general procedure for receiving, managing and conducting investigations into complaints.

**Any complaints related to sexual harassment will be handled under a stand-alone complaints and investigation procedure outlined in SEARRP's *Sexual Harassment Policy*.**

**Anonymous and other Whistleblowing complaints also follow a stand-alone and fully independent process as described in SEARRP's *Whistleblowing Policy & Procedure***

**"Employees"** means all SEARRP employees irrespective of status (i.e. it includes full-time, part-time, temporary and/or daily-paid staff).

**"Associates"** refers to all scientists, students, non-SEARRP research assistants, interns, volunteers, consultants and representatives, including Trustees and members of SEARRP-related boards (in the UK and Malaysia) and advisors engaged with SEARRP.

## 1. GENERAL COMPLAINTS PROCEDURE

1.1. Any person may raise concerns or report misconduct related to SEARRP, its employees and associates using the procedure outlined in this document.

1.2. SEARRP adopts a strict non-retaliation policy with respect to anyone making a complaint or reporting misconduct (see also Sections 3.6 and 3.7)

1.3. We expect all complaints to be made in good faith

### Making a complaint

1.5. Anyone may submit a complaint to any of SEARRP's senior team including our Field Managers, Head of Operations, Safeguarding Lead or to the SEARRP Director or Deputy Director. A complaint should ideally be made using the form available on the SEARRP website ([www.searrp.org/safeguarding/](http://www.searrp.org/safeguarding/)). Staff contact details are provided at the end of this document.

1.6. Once completed, the form can either be handed in person or emailed to one of the above or sent to: [reportinfo@searrp.org](mailto:reportinfo@searrp.org).

1.7. In situations where online access or sending emails may be problematic, an interim notification of a complaint can be submitted to the Head of Operations or Safeguarding Lead via a phone call, text or WhatsApp message on the understanding that a formal complaint form will be completed once communications permit. The contacts numbers for the Head of Operations and Safeguarding Lead are +60 14 865 5922 and +60 14 862 3877, respectively

### **Receiving a complaint**

1.8. Any complaint received by one of SEARRP's Field Managers will be reported to the Head of Operations within 24 hours – who will forward a copy of the complaint to the Director and Deputy Director

1.9. The SEARRP Director, in consultation with the Head of Operations, Deputy Director and Safeguarding Lead will determine whether to initiate an internal investigation, in accordance with the following guidance:

- a) The initial assessment of a complaint will be completed within 3 days
- b) In most cases an internal investigation will be initiated, which will follow the procedure outlined in Section 2
- c) If no internal investigation is actioned, the SEARRP Director will prepare a case report, with copies to the respective Chairs of the Board of Directors (BoD) of SEARRP's operating company in Malaysia (Rainforest Research Sdn Bhd - RRSB) and Board of Trustees (BoT) of SEARRP-UK. The Director will also notify the complainant, outline the reasons for the complaint not being taken forward and make clear that an appeals procedure is available.

1.10. The SEARRP Director may instruct the temporary suspension, relocation or separation of the people involved in complaint with immediate effect and until the complaints procedure has been concluded.

1.11. Reported complaints will, as far as possible, be treated in confidence providing this is consistent with the need to conduct a robust investigation and take whatever action which may be required

1.12. In complaints involving associates or organisations external to SEARRP, the SEARRP Director may engage with representatives of the respective organisation

### **Responsible personnel**

1.13. The SEARRP Field Manager will be responsible for administering the complaints procedure in field-based settings. Their responsibilities will include:

- a) Receiving and recording complaints in a case log, which will be made available to the Head of Operations
- b) Reporting any complaints to the Head of Operations within 24 hours

1.14. The Head of Operations will be responsible for administering the complaints procedure on behalf of SEARRP, in accordance with the following guidance:

- a) In the event a complaint is received directly in the KK Office that relates to a research site, the relevant Field Manager will be appointed to administer the case in the field;
- b) Ensuring that the SEARRP Director, and where appropriate the respective the Chairs of the BoD of RRSB and the SEARRP-UK BoT, are fully briefed on the complaint and subsequent case management;
- c) Liaising with the person who has submitted a complaint in a timely way and ensuring that the complainant is kept informed at each stage of the procedure;
- d) Providing whatever support that may be required to an internal investigation, including engaging with independent third-party experts, if needed;
- e) Preparation of a case report for submission to the SEARRP Director, with copies to the respective Chairs of the RRSB BoD and the SEARRP-UK BoT

### **Conflicts of interest**

1.15. In the event of a complaint which implicates either a Field Manager or Head of Operations, the SEARRP Director shall either manage the complaint personally or assign alternative personnel, including from independent third parties where appropriate, to administer the case.

1.16. In the event of a complaint involving the SEARRP Director, the Chair of the SEARRP-UK BoT, in consultation with the Chair of the BoD of RRSB, shall take direct responsibility for the complaint and subsequent case management and may engage either Trustees and/or independent personnel to provide support, as required

## **2. INTERNAL INVESTIGATION PROCEDURE**

2.1. SEARRP is committed to ensuring a transparent, timely and fair internal investigation into any reported complaints.

2.2. Subject to Section 1.15, the Head of Operations will be responsible for administering the internal investigation procedure

2.3. Based on the merits of the case, and in consideration of any conflicts of interest, the SEARRP Director may determine to either lead the procedure personally or appoint an independent third-party to lead or assist with the investigation.

### **Conduct of an internal investigation**

2.4. An internal investigation will involve:

- Conducting interviews with the person making the complaint;
- Conducting interviews with any witnesses and/or other people possessing relevant information to the case;
- Collecting any documentary evidence (e.g. testimonials, photos, emails, social media posts, etc.) relevant to the case; and
- Examining the site(s) where the reported incident has taken place

2.5. Under normal circumstances, an investigation will be completed no later than 14 days from receipt of the complaint. If an extension to this timeframe is necessary, the person submitting the complaint will be informed at least 7 days in advance with new completion deadlines recorded and advised

### **3. DISCIPLINARY ACTIONS & CORRECTIVE MEASURES**

3.1. On completion of an investigation, the SEARRP Director, in consultation with the Deputy Director and Head of Operations, will be responsible for determining and instituting any disciplinary or corrective actions that may be required. A report of any actions taken will be submitted to the respective Chairs of the BoD of RRSB and the BoT of SEARRP-UK.

3.2. Disciplinary action will be taken against any employee or associate who is found to have been in breach of SEARRP's policies and guidelines, including and up to termination of their employment or, in the case of associates, bringing their engagement with SEARRP to a close

3.3. In cases involving associates or other parties external to SEARRP, the SEARRP Director may elect to report the findings of an internal investigation to the respective institution

3.4. At the discretion of the Director, SEARRP retains the right to refer any person found to be in serious (i.e. potentially criminal) violation of SEARRP's policies and guidelines to law enforcement authorities

3.5. The SEARRP Director will inform (verbally and in writing) the complainant of the outcome of the investigation and advise of any actions which have been taken

#### **No-retaliation approach**

3.6. SEARRP operates on a strict 'no retaliation' basis with respect to any person who raises concerns or reports misconduct. This means that anyone making a complaint will not suffer intimidation, harassment, discrimination, abuse or other form of retaliation or, in the case of employees, any form of adverse employment consequences that may arise as a direct or indirect consequence of having made a complaint.

3.7. The SEARRP Director will, after consultation with the Deputy Director and Head of Operations, impose severe disciplinary actions against any employee or associate who retaliates or threatens retaliation against a person who has raised concerns or reported misconduct. In most cases this would involve dismissal or expulsion from SEARRP.

#### **Acting in good faith**

3.8. Our default assumption is that any reported complaint will have been made in good faith. This means that the person making a complaint must have reasonable grounds for believing that a) the information they have provided is true, and b) that the behaviour they have been subject to or witnessed is either harmful, in violation of SEARRP's code of conduct or illegal.

3.9. Any person found to have made knowingly false, malicious or vexatious allegations will be subject to disciplinary action, up to and including termination of employment or engagement with SEARRP.

3.10. SEARRP retains the right to seek legal recourse against a person who does not act in good faith with respect to complaints

#### **4. APPEALS**

4.1. Any person who wishes to complain about the handling of a case and/or contest the outcome of an internal investigation may submit an appeal in writing (within 7 days) to the Chair of the BoD of RRSB, who will notify the Chair of the BoT of SEARRP-UK that an appeal has been lodged.

4.2. The SEARRP Director will ensure full disclosure of all information pertaining to the case to the Chair of the BoD of RRSB and the Chair of the BoT of SEARRP-UK

4.3. The Chair of the BoD of RRSB, in consultation with the Chair of the BoT of SEARRP-UK, will initiate an inquiry. Depending on their view of the merits of the appeal, the Chairs may elect to appoint an Inquiry Panel to comprise the independent non-executive director of RRSB and one or more Trustees from the SEARRP-UK Board. If deemed necessary, a fully independent third party panel member may be appointed

4.5. The Inquiry Panel will aim to complete an inquiry within 14 days of the receipt of the appeal, with a case report submitted to the Chair of the BoD of RRSB and the Chair of the BoT of SEARRP-UK.

4.6. The Chair of the BoD of RRSB, in consultation with the Chair of the BoT of SEARRP-UK, will notify the appellant of the outcome in writing and advise on next steps, if any.

#### **Contact emails for submitting complaints**

Dr Glen Reynolds, Director: [glen.searrp@icloud.com](mailto:glen.searrp@icloud.com)

Melisa Payne, Deputy Director: [melissa@searrp.org](mailto:melissa@searrp.org)

Adrian Karolus, Head of Operations: [adrian@searrp.org](mailto:adrian@searrp.org)

Katie King, Safeguarding Lead: [katie@searrp.org](mailto:katie@searrp.org)

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