



# SUMERNET

## Reporting and Managing Complaint Guidelines



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# SUMERNET: Reporting and Managing Complaint Guidelines

This document provides a set of procedures for reporting and managing complaints related to the network as part of the continuous efforts by SUMERNET to ensure rigorous and transparent processes in the implementation of our programme activities.

## 1. Introduction

The Sustainable Mekong Research Network (SUMERNET) is a long-term programme and regional research network to inform and influence policy development on sustainable development in the Mekong Region. The SUMERNET network is guided by SUMERNET Network Members (SNMs), who collectively deliberate on strategic issues that have implications for the whole network. The SNMs delegate their authority in taking strategic decisions to SUMERNET Steering Committee (SSC). The SUMERNET Secretariat (SS) hosted at Stockholm Environment Institute (SEI) provides the day-to-day management, coordination and technical support to the network under the direction of the SSC. The network currently consists of more than 300 members who are engaged with various activities under SUMERNET.

SUMERNET is a voluntary, non-legally binding professional network, which strives to achieve transparency and maintain high ethical standards in the operations of its programmes. Since SEI serves as the Secretariat and has a legal status, it represents the network in entering into various agreements with the donors and other parties for SUMERNET programmes. Following the endorsement by the SSC, several procedures and guidelines of SEI are currently used to ensure rigorous and transparent processes in the implementation of the programme activities. This includes but is not limited to e.g. SEI Code of Conduct, SEI Procurement Instruction, SEI Anti-corruption Strategy including Action Plan, SEI Whistleblowing guidelines.

SUMERNET has an open communication approach and continuously strives to improve its processes and outcomes as such seeking constructive feedback continually.

**For general concerns or non-serious complaints<sup>1</sup>** directly related to programme activities or the network, they can be communicated with the SUMERNET Secretariat, who will consult with the SSC Chair (or designated SSC member(s)) and coordinate with concerned parties to give the feedback.

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<sup>1</sup> *General concerns or non-serious complaints are the complaints on the issues not fallen into same categories of serious complaints listed below.*

**To address serious complaints<sup>2</sup>, this document serves as a guideline to describe how complaints could be reported and managed in a professional and timely manner.** It is also a tool for maintaining anonymity of the complaint reporter(s) and trust and credibility in our operations by enabling us to review the complaint and act on it to minimize the impacts on individuals, the programme, the network, society, or the environment, as a result from SUMERNET programme activities.

## 2. Complaints

Only concerns or complaints with direct link to the SUMERNET programme or network activities can be reported to this mechanism. The nature of complaints could be those related to following issues:

- disputes between any members within the network including SNM, SSC, or SS in the context of SUMERNET programme or network.
- financial misconduct including, but not limited to, theft, fraud, corruption, bribery, kickbacks, conflict of interest, nepotism and favouritism or any form of willful or negligent acts or omissions, which permits unauthorized, irregular or inappropriate expenditures relevant to SUMERNET programme.

Depending on the nature of reported cases, some cases may not be directly dealt with by SUMERNET but other mechanisms e.g. policies of the organizations that concerned parties belong to, terms and conditions stipulated in legal agreements that concerned parties have officially signed on, national legislations. This will be judged on a case by case basis.

Any concerns or complaints related to the SNM or SSC or SS that are not directly linked with the SUMERNET programme and network activities, are not covered by this guideline and thus should be reported to other individual organizational channels.

## 3. Reporting mechanism

A person who experiences or suspects any issues as identified under section 2) can report the complaints to any of these focal persons below.

- SUMERNET Programme Manager (agus.nugroho@sei.org),  
SUMERNET Secretariat
- SUMERNET Programme Director (chayanis.k@sei.org),  
SUMERNET Secretariat

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<sup>2</sup> *Serious complaints are the complaints related to dispute among different parties, financial misconduct, harassment, sexual misconduct and child safeguarding. SUMERNET deal with the issues related to first two categories. For issues in other categories, they should be dealt with by other mechanisms.*

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- SUMERNET Steering Committee Chair (hapnavy@yahoo.com)
  - External investigator who is the third party outside the network and SEI (<https://www.sei.org/about-sei/organization/governance/whistleblowing/>)

For the safety and security of every individual, all reported information will be treated with the strictest confidentiality and only shared with the individuals involved in the review/investigation process, unless the permission is given by information owners.

A person who reports an incident is encouraged to provide details of allegations such as event, place, date, time and people, as much as possible, but does not need to provide any evidence especially if seeking of such evidence could be deemed harmful to the reporter.

Please note that any deliberate report of false, distorted or malicious information or forgery of documents is unlawful (according to Thailand Criminal Code B.E. 2499) and disciplinary action possibly in the court of law will be undertaken.

#### 4. Investigation Committee

- SSC Chair (or representative)
- SUMERNET Programme Director
- SUMERNET Programme Manager
- 1-2 SSC members appointed by the SSC Chair where needed.
- External investigator if needed

#### 5. Investigation processes

We ensure that anyone who may be involved in or has influence over the incident will be excluded from the investigation committee.

- Upon receipt of a complaint, the focal person will inform the above committee to start reviewing the incident.
- After a dialogue with the individual reporting the complaint, if the committee judges that the reported case does not fall within relevant categories or beyond the authority/responsibility of SUMERNET, the case may be declined with the explanation for reasons.
- For the declined case, SUMERNET will provide information of other channels (and contact address if available) that might be more relevant for the individual reporting the complaint to consider whether he/she wants to contact them further.
- In cases where the reported case directly links with SUMERNET activities and fulfils the relevant categories (i.e. disputes between any parties in the network, financial misconduct), the case will be upheld and moved on to the investigation process.
- The individual making the allegation may be contacted to gather further information, as appropriate.

- Any witness may be contacted, if needed.
- The alleged offender will be interviewed to understand their view of events, as appropriate.
- The investigation team will make the recommendation with supporting evidence to the SSC Chair (or representative) for consideration and endorsement.
- In certain cases, it may be necessary to report the case to police and relevant authorities and organizations that the alleged offender belongs to for follow up actions.
- The investigating team will send appropriate feedback to the person who makes the complaint and other parties concerned as soon as possible.

## 6. Additional information about SEI Whistleblowing

Any issues of misconduct or harassment can be highlighted anonymously via the [SEI Whistleblowing Guideline, in this link](#).

[SEI's whistleblowing service](#) is designed for (but is not limited to) reporting of suspicious of serious irregularities relating to:

- accounting, internal accounting control, auditing, bribery, banking and financial crime
- serious environmental crimes
- major workplace safety deficiencies
- very serious forms of discrimination and harassment.

