WADDAN

PARTNER IN DEVELOPMENT

Our Procedures

How WADDAN handles complaints, safeguarding concerns, partners, purchasing and screening

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PUBLICATION STATUS

✔ **Signed and approved by the CEO of WADDAN for publication on the official website.**

About this document

This document explains, in plain steps, how WADDAN handles the matters that communities, partners, suppliers and donors most often ask about. WADDAN also has detailed internal procedures; only the public-facing steps and commitments are shown here.

AT A GLANCE

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PUBLIC PROCEDURES

This is a public summary. It describes WADDAN's commitments and general approach; it does not reproduce internal procedures, approval limits, security arrangements or contact points that WADDAN keeps for internal use.

Contact

For general enquiries, please visit the Contact page of the WADDAN website: www.waddan.org/contact
To raise a complaint or safeguarding concern, please visit: www.waddan.org/complaints

1. Community Feedback & Complaints (Grievance Redress Mechanism)

Source policy: Accountability to Affected Populations Policy.

Who can use it and how

Anyone affected by WADDAN's work can give feedback or make a complaint, orally or in writing, in any language, and anonymously if they wish. Channels at each project site are in-person contact and email, in Pashto, Urdu and English. Contact details are displayed at each project site and at www.waddan.org/complaints.

Steps

1	**Receive and record.** The complaint is recorded in the Community Grievance Register with a unique reference.
2	**Classify.** It is classified as feedback or a suggestion, a programme complaint, a complaint about staff conduct, a safeguarding or PSEA concern, or suspected fraud or corruption. Safeguarding concerns go straight to the Safeguarding Focal Person; fraud concerns are handled through the confidential anti-fraud channel.
3	**Acknowledge.** Where the person can be contacted, receipt is acknowledged within 5 days with the reference and the expected response time. For anonymous complaints, a general response is published at the site.
4	**Review.** The facts are reviewed fairly and confidentially. Staff who are the subject of a complaint take no part in the review.
5	**Decide and respond.** The decision and any remedy are communicated within 30 days of receipt, in an accessible format, with the reason and the right to appeal.
6	**Escalate if needed.** If the complaint cannot be resolved within 30 days, or the complainant does not accept the decision, it is escalated to the Director Programs, then the CEO, then the Board. Complaints involving the CEO go to the Board Chair.
7	**Close and learn.** The case is closed with the outcome and the complainant's response, feedback on the process is sought, and all cases are reviewed monthly to identify patterns and programme changes.

Protection

A complainant's identity is protected. No one who gives feedback, complains or helps another person to complain suffers any disadvantage; retaliation is gross misconduct.

2. Responding to Safeguarding Concerns

Source policies: Safeguarding, PSEA & Child Protection Policy; Safeguarding Code of Conduct.

Anyone who has a concern about sexual exploitation and abuse, harassment, child abuse or trafficking should report it straight away to the Safeguarding Focal Person, the confidential email, or the Board Chair if the concern involves the CEO or senior management. Contact details are available at www.waddan.org/complaints. A concern does not need to be proved before it is reported.

1	**Report and acknowledge.** The report is logged in a secure register and acknowledged.
2	**Protect.** The survivor's safety is assessed and referral to support services is arranged where needed. Survivors are never penalized for reporting.
3	**Inform leadership.** The CEO is informed, or the Board Chair if the CEO or senior management is involved.
4	**Investigate independently.** An investigation committee of at least three members, including at least one woman and independent of everyone involved, is formed. The investigation is survivor-centred and confidential.
5	**Decide.** The outcome may be disciplinary action, referral to law enforcement (taking account of the survivor's informed wishes), or closure with recorded reasons.
6	**Close.** Lessons are documented, policies are updated if needed, and the reporter is informed of the outcome. WADDAN's target is to complete the process within 45 days.
7	**Donors.** Serious cases are notified to donors as the grant agreement requires.

Protection

Anyone who reports in good faith is protected from retaliation. Retaliation is gross misconduct.

3. Reporting Fraud, Corruption or Serious Misconduct

Source policy: Anti-Fraud, Anti-Corruption & Whistleblower Protection Policy.

Anyone may report suspected fraud, corruption, bribery or other serious misconduct, and may do so anonymously. Reports go to the Director Finance & Compliance or, if senior management is involved, to the CEO or the Board Chair. Contact details are available at www.waddan.org/complaints.

- Every disclosure is acknowledged within 72 hours.
- It is investigated by people independent of the matter, with a full investigation completed within 30 working days (longer for complex cases, with a documented reason).
- Where the reporter's identity is known, a summary of the outcome is shared with them.
- All disclosures and outcomes are logged in a secure register.
- Substantiated cases can lead to disciplinary action, legal referral, notification of donors and recovery of misappropriated funds.
- Knowingly false reports made maliciously are subject to separate disciplinary review.

Non-retaliation

No person making a good-faith disclosure may be dismissed, demoted, suspended, threatened, harassed or subjected to any adverse action. Retaliation is gross misconduct. The protection continues after a person's engagement ends and covers witnesses who support disclosed concerns.

4. Partner Selection & Due Diligence

Source policies: Partnership Due Diligence Policy; Safeguarding Partner Compliance Policy.

Due diligence is proportionate to the type and size of the partnership, and safeguarding is assessed wherever a partner has contact with communities.

Partnership level	Due diligence requirements
Information sharing / MoU (no funds)	Legal registration check; reputational web search; Director of Programs approval
Technical collaboration (no funds)	Registration, safeguarding policy review, 2 references; Director of Programs and Director Legal & Governance approval
Sub-grant below PKR 5,000,000	Full due diligence checklist including safeguarding, anti-fraud and sanctions screening; CEO approval
Sub-grant above PKR 5,000,000 or strategic partner	All of the above, plus audited financial statements (2 years), field verification, Board notification and an external reference check

1	**Open a due diligence file** and confirm the level required.
2	**Collect and verify.** The partner provides the documents requested; WADDAN checks registration directly with the authority, reviews governance, financial, safeguarding and anti-fraud documents, takes up references and carries out a reputational search.
3	**Screen** the partner against sanctions lists.
4	**Verify on the ground** for larger or strategic partners.
5	**Rate the risk** (low, medium or high) and record reasons and gaps.
6	**Recommend and approve.** The approving authority records the decision in writing.
7	**Check safeguarding.** The partner's written safeguarding / PSEA policy is reviewed; a partner whose policy does not meet the standard receives written feedback and support, and no agreement is signed until it is approved. The partner names a female Safeguarding Focal Point and describes its community complaint mechanism.
8	**Sign an agreement** that includes the Code of Conduct and Safeguarding Declaration, safeguarding obligations, an anti-fraud clause, prompt incident notification, audit and access rights, and suspension and termination provisions.
9	**Train before deployment.** Partner personnel sign the Code of Conduct and complete safeguarding awareness training before community deployment.
10	**Release funds only when all checks are complete.**

5. How WADDAN Buys Goods and Services

Source policy: Procurement Policy & SOP.

1	**Plan.** Procurement is planned with the annual budget, and needs are consolidated to obtain competition and avoid splitting purchases.
2	**Requisition.** The requesting department raises a purchase requisition with specifications and a budget line; Finance confirms funds and donor eligibility, including any stricter donor rule.
3	**Choose the method** according to the value of the requirement and confirm the approval level.
4	**Invite offers.** Quotations, bids or tenders go to eligible, registered vendors on equal terms with the same information and deadline. Open tenders are advertised widely, including to local and women-led suppliers.
5	**Receive and open bids.** Bids are received by a person who is not on the evaluation team, kept sealed until the deadline and opened in front of at least two people, with an opening record.
6	**Evaluate.** Criteria and weights are set before bids are opened. A Procurement Committee evaluates and records its scores and reasons in a written report.
7	**Approve.** The award is approved by the authorized person, who must be different from the initiator and the evaluators.
8	**Contract.** A written contract or purchase order is issued. Contracts include the Code of Conduct, anti-fraud, safeguarding, audit-access and termination clauses.
9	**Receive and certify.** Goods or services are checked against the specification and discrepancies are resolved before payment.
10	**Pay.** Finance matches the requisition, contract or order, receiving record and invoice before paying.
11	**Evaluate the vendor and file.** Vendor performance is scored and the full procurement file is kept.

Non-competitive (sole-source) purchasing is exceptional: it needs a written justification and advance CEO approval. In a genuine emergency the CEO may authorize a simplified process in writing, and such cases are reported to the Board's Finance & Audit Committee.

6. Sanctions & Counterparty Screening

Source policy: AML/CFT & Anti-Terrorism / Sanctions Compliance Policy.

1	The responsible officer submits the name, registration details and beneficial owners of the donor, partner, vendor or Board member for screening.
2	Screening is carried out against the UN Security Council list, EU sanctions, the OFAC SDN list and the Pakistan NACTA list, and recorded in a Sanctions Screening Log with the date, lists checked, result and name of the screener.
3	A clear result allows the process to proceed. No agreement is signed, contract awarded or payment released before the required screening is complete.
4	A possible or positive match is escalated to the CEO and the Director Legal & Governance and is never overridden at a lower level.

7. Environmental & Social Screening of Programmes

Source policy: Environmental & Social Safeguards (ESS) Policy.

1	During programme design the Program Manager completes an Environmental Screening Checklist covering environmental, climate, community, labour, land and resource, water and biodiversity risks, and proposes a category.
2	The Director of Programs reviews and confirms the category. Where there is doubt between two categories, the higher-risk category applies.
3	Required instruments are prepared: an environmental and social impact assessment for Category A, an environmental management plan and stakeholder consultation for Category B, a screening record for Category C, and a partner capacity assessment for Category FI.
4	The result is recorded in the project design and the budget includes the cost of the instruments.
5	A programme without documented screening is not submitted for approval. Screening is repeated if the scope, location or context changes materially.

8. Research Ethics Review

Source policy: Research Ethics Policy.

1	The lead researcher submits a proposal with an ethics section covering purpose, participants, recruitment, risks and benefits, consent procedures, participant protection and referral arrangements, data protection and handling, and dissemination.
2	Reviewers declare any conflict of interest, examine the proposal, may request changes, and record their decision as approved, approved with conditions or not approved, with reasons.
3	The ethics review is documented and filed with the proposal, and is made available to donors on request.
4	Material changes during the study are reviewed before they are applied.
5	No fieldwork begins until approval is recorded.