



INTERNATIONAL ORGANIZATION FOR COUNTERING TERRORISM



Complaints and Whistleblowing Policy

International Organization for Counter-Terrorism (IOCT)

Article (1): Purpose

This Policy aims to provide safe, transparent, and effective mechanisms for submitting complaints and reporting misconduct, violations, or unethical or unlawful behavior, and to ensure such reports are handled fairly, impartially, and professionally, thereby strengthening accountability, protecting rights, and building institutional trust.

Article (2): Scope of Application

This Policy applies to:

- The Board of Trustees
- The Secretariat
- Committee members
- Employees and contractors
- Experts and trainers
- Volunteers
- Partners and collaborators
- Beneficiaries of the Organization's programs and activities

Article (3): Guiding Principles

The Organization is committed to the following principles:

1. Accessibility and clarity.
2. Confidentiality and protection of privacy.
3. Impartiality and independence.
4. Non-retaliation and protection of whistleblowers.
5. Fairness and due process.
6. Transparency and accountability.





INTERNATIONAL ORGANIZATION FOR COUNTERING TERRORISM



Article (4): Types of Complaints and Reports

Complaints and reports may include, but are not limited to:

1. Abuse of authority or misuse of resources.
2. Corruption, fraud, or financial misconduct.
3. Violations of internal policies or applicable laws.
4. Exploitation, abuse, or harassment.
5. Human rights violations or discrimination.
6. Conflicts of interest or unethical conduct.

Article (5): Reporting Channels

The Organization provides the following reporting channels:

1. A designated official email address for complaints.
2. An approved electronic or paper reporting form.
3. Direct communication with the competent authority.
4. Verbal reporting in urgent cases, to be documented subsequently.

Article (6): Conditions for Submitting a Complaint

1. Complaints should be submitted with as much clarity as possible.
2. Complaints may be submitted anonymously or with identification.
3. Full evidence is not required at the reporting stage; reasonable suspicion is sufficient.
4. Malicious or unfounded complaints may be dismissed.

Article (7): Protection of Whistleblowers

The Organization shall:

1. Prohibit any form of retaliation against whistleblowers acting in good faith.
2. Protect the identity of whistleblowers, disclosing it only when legally required.
3. Take immediate action in cases of threats, pressure, or intimidation.





INTERNATIONAL ORGANIZATION FOR COUNTERING TERRORISM



Article (8): Complaint Handling Procedures

The Organization shall apply the following procedures:

1. Registering the complaint and acknowledging receipt where possible.
2. Conducting a preliminary assessment to determine credibility and jurisdiction.
3. Referring the complaint to the competent authority or an independent committee.
4. Conducting a professional, impartial, and confidential investigation.
5. Issuing appropriate findings and recommendations.

Article (9): Timeframes

1. Initial assessment shall be conducted within a reasonable period not exceeding fourteen (14) days.
2. Investigations shall be completed within a timeframe appropriate to the nature of the complaint.
3. The complainant shall be informed of the outcome where feasible, without compromising confidentiality.

Article (10): Corrective Actions

Where a violation is substantiated, the Organization shall:

1. Take appropriate disciplinary or administrative measures.
2. Address harm caused to victims or affected parties.
3. Review policies or procedures to prevent recurrence.

Article (11): Relationship with Other Policies

This Policy shall be implemented in coordination with:

- Integrity and Conflict of Interest Policy
- Prevention of Exploitation and Abuse (PSEA) Policy
- Child and Youth Safeguarding Policy
- Transparency and Accountability Policy





INTERNATIONAL ORGANIZATION FOR COUNTERING TERRORISM



Article (12): Institutional Responsibilities

- The **Board of Trustees** shall exercise overall oversight of this Policy.
- The **Secretariat** shall be responsible for implementation and compliance monitoring.
- The **Complaints and Compliance Committee** shall manage investigations and reporting.

Article (13): Breach of Policy

Obstructing the submission of complaints or retaliating against whistleblowers shall be considered a serious violation and shall be subject to disciplinary and accountability measures in accordance with the Organization's internal regulations.

Article (14): Entry into Force and Review

1. This Policy shall enter into force upon approval by the Board of Trustees.
2. It shall be reviewed periodically every three (3) years or as necessary.

