



ចក្ខុវិស័យសិទ្ធិមនុស្សកម្ពុជា
Cambodian Center for Human Rights

MAY 2026

COMPLAINTS AND INCIDENT RESPONSE MECHANISM



Version History:

Version	Date	Update Description	Approved by
000	13 May 2026	Finalize the draft	Executive Director
001	30 May 2026	Review and sign off for implementation.	Chair of Board of Director

Contents

1. Introduction	3
2. Definitions	3
3. Purpose, principles, and values.....	4
4. Scope of the mechanism.....	4
5. Complaint and incident pathways.....	5
6. Complaint procedures	5
7. Roles and responsibilities.....	7
8. Response timeframes.....	7
9. Information and training.....	8
10. Annexes (templates for CCHR).....	8

CCHR Complaint and Incident Mechanism (CIRM)

1. Introduction

The Cambodian Center for Human Rights (“CCHR”) envisions a non-violent Cambodia where all people enjoy their fundamental human rights, are treated equally, and are empowered to participate in democratic processes while benefiting from the country’s development. To support this vision, CCHR has created a safe and reliable mechanism for anyone affected by its work to report concerns. As human rights work involves sensitive issues and vulnerable groups, this system ensures that staff, rights holders/beneficiaries and suppliers can report misconduct, abuse, or harm without fear of retaliation.

This Complaint and Incident Mechanism (“mechanism”) demonstrates CCHR’s commitment to transparency, accountability, and continuous improvement. By responding to complaints promptly and fairly, CCHR reduces harm, strengthens public trust, and ensures its programs remain ethical and effective. Complaints also help identify risks and improve organizational practices. This commitment thus applies to every employee and guides the organization’s efforts to create a safe and respectful environment for all.

This mechanism is aligned with CCHR’s Sexual Harassment Policy, Child Protection Policy, and other CCHR policies, which require safe and responsive complaint systems. Sensitive cases involving staff or suppliers are handled confidentially and reviewed by the Management Committee/Board of Directors to ensure proper oversight and alignment with international standards.

2. Definitions

- **Complaint** – A formal expression of dissatisfaction about CCHR’s work, behavior of our staff/suppliers, or how a decision was made.
- **Incident** – An event that may pose risk or harm to people, assets, information, or reputation (e.g., security incident, data breach, accident).
- **Feedback** – Opinions or suggestions (positive or negative) that do not necessarily require investigation.
- **Concern** – An informal signal that something might be wrong. It can become a formal complaint after initial review.
- **Investigation** – A structured process to gather and analyze information to establish facts about an allegation.
- **Misconduct** – Breach of law, policy, or code of conduct (e.g., fraud, corruption, exploitation, harassment, safeguarding breaches).
- **Non-sensitive (operational) complaint** – About the quality, timeliness, relevance, or access to services; or minor staff behavior not amounting to a serious breach.
- **Sensitive complaint** – Serious or repeated breaches of staff/suppliers’ codes and policies (e.g., SEA/Sexual Harassment (SH), child abuse, fraud/corruption, gross misconduct, serious data/privacy breach).
- **Anonymous complaint** – Complainant withholds identity; CCHR still assesses the complaint and acts on the available facts.
- **Malicious complaint** – Knowingly false complaint intended to harm.
- **Reprisals/retaliation** – Any negative act because someone reported a concern.
- **Subject of concern** – The person alleged to have committed misconduct.

- **Witness** – Anyone who provides information relevant to a case.
- **Survivor** – A person who has experienced harm, abuse, exploitation, violence, harassment, or other misconduct in connection with the organization’s work.
- **Whistleblower**– A person who reports, in good faith, suspected or actual misconduct, wrongdoing, or breaches of law, policy, or ethical standards, whether or not they are personally affected by the incident.
- **Complainant**– An individual or group who submits a complaint or concern through the Complaint and Incident Mechanism. The complainant may be a survivor, a whistleblower, a witness, or a person acting on behalf of an affected individual or community.

3. Purpose, principles, and values

CCHR ensures that anyone affected by our work can safely report concerns or complaints without fear of retaliation. Reports are reviewed promptly, treated seriously, and addressed through a fair and timely process. This helps us uphold strong accountability standards and maintain trust with communities.

It protects complainants, survivors, and whistleblowers by ensuring confidentiality, respectful treatment, and a safe reporting environment. All complaints are handled without bias and without discrimination based on gender, age, disability, ethnicity, political opinion, sexual orientation, gender identity and expression and sex characteristic (“SOGIESC”), or any other status. Everyone is treated with dignity throughout the process.

It assesses potential risks at every step of receiving, investigating, and responding to complaints. All actions are designed to reduce possible harm to individuals, communities, and staff. When risks are identified, we take immediate measures to prevent them from escalating.

For cases involving SEA/SH or other protection-related harms, we prioritize the survivor’s safety, choice, confidentiality, and dignity. Survivors control what information is shared and what steps they wish to take next. We also provide clear information about available support services and referral options.

4. Scope of the mechanism

4.1 Who can complain

Anyone engaged with or affected by CCHR or rights holders/beneficiaries, suppliers, complainants/survivors, witnesses, staff, consultants, interns, donors, and the public.

4.2 What can be complained about

Individuals can raise complaints about any issue where they believe CCHR’s work, staff, or suppliers have caused harm, acted inappropriately, or failed to meet expected standards. This includes concerns about service quality, such as lack of access, services that are not relevant or timely, or treatment that feels unfair. Complaints may also relate to staff or suppliers’ behavior, including discrimination, harassment, or other actions that violate our code of conduct and expected professional standards.

More serious concerns can also be reported, such as safeguarding incidents, including SEA/SH, child safeguarding breaches, or any behavior that puts people at risk. Additionally, people can report fraud, corruption, conflicts of interest, or misuse of funds or assets, as well as breaches of

data protection, confidentiality, or privacy. Any issue that threatens people's safety, dignity, rights, or trust in CCHR's work is considered a valid complaint.

4.3 What is not addressed here

This mechanism does not cover issues related to employment or internal HR grievances, which must be handled through CCHR's separate human resources procedures. It also does not address political disagreements with CCHR's public positions or advocacy stances, as these are part of our mandate and therefore not subject to the complaints process. In addition, we cannot process complaints about projects, activities, or actors that are not funded, implemented, or managed by CCHR; however, when possible, we will help direct the complainant to the appropriate organization or authority.

4.4 What should not be reported

This mechanism should not be used for everyday information requests or for spam and abusive messages, because these are not complaints about our work or conduct. When possible, we will still help by directing individuals to the correct resource in order to get the information they need.

5. Complaint and incident pathways

5.1 Multiple reporting channels

CCHR provides several ways for individuals to safely report concerns. Complaints can be made through our phone number (+855 (0) 23 72 69 01 from 8am to 12pm and 2pm to 5pm of the working day), or in-person to any CCHR staff member or designated suppliers' focal point, who must record the complaint the same day. Additional options—such as a dedicated email address, messaging apps, or suggestion boxes—may be introduced in the future to expand accessibility. The hotline number will be shared widely in all community information materials, suppliers, and staff email signatures.

5.2 Confidentiality rules

All identities and case details are shared strictly on a need-to-know basis to protect the safety and privacy of everyone involved. Complaint files are stored securely with tightly limited access, and any breach of confidentiality is considered serious misconduct.

5.3 Protection from retaliation

CCHR strictly prohibits any form of retaliation, intimidation, or threats against complainants, survivors, witnesses, or staff who report concerns in good faith. Anyone who fears or experiences reprisals can report it immediately, and such cases are treated as sensitive and handled with heightened protection and confidentiality.

6. Complaint procedures

6.1 Receipt

Complaints may be received through the hotline, in person, or any approved reporting channel. All reports must be logged immediately in the CCHR Case Log, and if received in person, the staff member should complete the Complaint Form with the complainant's consent. If there are any urgent risks such as immediate safety concerns or a child at risk—the case must be swiftly

escalated to the Management Committee/Board of Directors within 24 hours, and immediate mitigation measures must be taken as outlined in Section 6.3.

6.2 Acknowledgment

CCHR will acknowledge receipt of every complaint within 7 working days, providing a verbal acknowledgment for hotline reports and a written one when contact details are available. At this stage, CCHR will inform the complainant about what will happen next and give an approximate timeline for the review and follow-up process.

6.3 Documentation and data protection

All complaints must be documented using factual, neutral language, avoiding assumptions or judgment. Digital records are stored securely in the restricted CIRM folder, while any physical documents are kept in a locked cabinet with controlled access. Personal data should be collected and recorded only when necessary and proportionate to managing the case.

6.4 Screening and risk assessment

Each complaint is first classified as operational (non-sensitive) or sensitive based on the definitions in this guideline. Staff then conduct a quick risk assessment, checking for immediate safety concerns, potential retaliation, risks to evidence, and any program or security implications. Based on this triage, operational cases may be resolved quickly at the appropriate level, while sensitive cases are escalated to the Management Committee/Board of Directors for further action.

6.5 Survivor-centered basics (for SGBV/SEA/child safeguarding cases)

CCHR follows survivor-centered principles to ensure safety and dignity at every step. Staff first check for any immediate risk and avoid pressuring the survivor for details. All information is kept confidential and shared only on a strict need-to-know basis. Survivors are supported to make their own choices, with clear explanations of available options and any limits to confidentiality, such as mandatory reporting for children. Staff also provide information on referral services, including medical care, psychosocial support, legal aid, and protection hotlines. Reporting to the police is never forced or coerced; survivors make their own decisions unless the law requires otherwise, and child-related cases are handled in line with child safeguarding procedures and national laws.

6.6 Investigation steps

Investigations are authorized solely by the Management Committee, which appoints impartial internal or external investigators with the appropriate skills, all of whom sign confidentiality undertakings. The investigation process typically includes planning the approach, collecting evidence and conducting interviews, analyzing the information, and submitting findings and recommendations to the Management Committee/Board of Directors. Throughout the process, impartiality and fairness are ensured: the subject of concern is given an opportunity to respond to the allegations, while the complainant's identity is never disclosed without their consent.

6.7 Decision-making and outcomes

The Management Committee reviews the investigation report in full and decides on appropriate outcomes, which may include but is not limited to disciplinary measures, program adjustments, capacity-building requirements, or referrals to relevant services or authorities. Once a decision is

made, CCHR communicates the outcome to the complainant to the extent that it is safe, appropriate, and consistent with confidentiality obligations.

6.8 Appeal process

Both the complainant and the subject of concern may submit an appeal if they believe there were issues of procedural fairness or if new, relevant evidence has since emerged. Appeals must be filed within 30 working days of receiving the outcome notification. Each appeal is reviewed by the Board of Directors, which is not involved in the original decision, or by an external reviewer to ensure independence and fairness.

6.9 Closing and archiving

The case is formally closed once all agreed actions have been completed and the relevant parties have been informed of the outcome, in line with confidentiality and safety considerations. All case materials are then securely archived—digital files in the restricted CIRM system and any physical documents in a locked, access-controlled location—to ensure long-term protection of sensitive information.

7. Roles and responsibilities

- **CIRM focal point:** The CIRM Focal Point is an appointed CCHR staff member who is responsible for receiving complaints, ensuring they are logged correctly, conducting initial screening and risk assessments, and forwarding cases to the appropriate level. They also provide guidance to staff and help maintain safe, confidential reporting channels.
- **Investigation team/investigator:** The investigator or investigation team will be formed of CCHR staff, including at least one Management Committee member. The investigation team/investigator is responsible for gathering evidence, interviewing relevant parties, analyzing findings, and preparing a confidential report for the Management Committee/Board of Directors. They must remain impartial, skilled, and bound by strict confidentiality rules.
- **Management committee:** The Management Committee oversees operational follow-up, including implementing corrective or disciplinary actions, strengthening systems, and ensuring organizational learning. They help address any programmatic or staffing implications that arise from cases. In cases where Management Committee members are involved in the complaint, the case is handled by the Board of Directors.
- **Board of Directors:** The Board provides oversight on high-risk or high-impact cases and ensures that CCHR meets its governance, accountability, and safeguarding obligations. They intervene only when necessary to uphold independence and integrity.

8. Response timeframes

CCHR aims to acknowledge all complaints within 7 working days. Operational (non-sensitive) cases should be resolved within 30 working days wherever possible. Sensitive cases require a rapid risk assessment within 72 hours, with an investigation launched within 10 working days and ideally completed within 45–60 days, depending on complexity - any extensions beyond this must be documented. Appeals must be submitted within 30 working days, and each appeal is reviewed within a further 30 working days.

9. Information and training

CCHR promotes awareness of the CIRM by displaying the hotline number in offices, at community meetings, and on CCHR materials, along with simple explanations of how to file a complaint and what to expect. All community information materials use plain, rights-affirming language, visual icons, and a brief privacy statement to ensure accessibility. Staff and suppliers receive annual training on CIRM, safeguarding, safely receiving disclosures, confidentiality, and basic referral procedures. Each year, anonymized trends and lessons are compiled to support organizational learning and, where appropriate, shared publicly to strengthen accountability.

10. Annexes (templates for CCHR)

Annex 1 — Complaint handling flowchart

Annex 2 — Step-by-step procedures for Complaint Handling

Annex 3 — Complaint & Incident Form

Annex 4 — Investigation Terms of Reference

Annex 5 — Case Log (register)

---END---