

SEAH REPORTING AND RESPONSE PROCEDURE – PROCESS FLOW

SWAGAA
Toll Free | 951
SMS | 8500

NATICC
79653610

REPORTING CHANNELS



Suggestion / Whistleblower Box



Walk-in / Manager / GRM

1

COMPLAINT RECEIVED



SEAH complaint submitted by internal or external stakeholder via hotline, email, manager, or walk-in.

Acknowledge receipt within 24 hours.

2

INITIAL ASSESSMENT & SAFETY



Assess immediate safety risk to determine whether immediate medical care, protection or emergency assistance is required.

Survivor is informed of available services and with informed consent, is referred to the Bank's contracted GBV Service Provider.

3

SURVIVOR SUPPORT & CASE MANAGEMENT



GBV service provider assumes primary responsibility for confidential survivor support, including psychosocial counselling, medical referrals, legal assistance, safety planning and coordination with authorities where applicable.

4

CASE ASSESSMENT & ADMINISTRATIVE INVESTIGATION



- GBV service provider conduct an initial assessment and advise the Bank on the appropriate response pathway.
- Internal perpetrator: Human Capital conducts an internal administrative investigation.
- External perpetrator: Relevant business unit investigates contractual or service-related aspects.
- Criminal matters referred to law enforcement.

Target: Within 30 days.

5

DECISION & CORRECTIVE ACTION



Bank determines appropriate corrective measures based on investigation findings and recommendations from the GBV Service Provider.

Internal stakeholders subjected to disciplinary action, while external stakeholders may be subject to contractual remedies or referral to law enforcement, as applicable.

6

COMMUNICATION OF OUTCOME



For Internal Stakeholders: Outcome of the administrative process shall be communicated to the complainant and respondent within the limits of confidentiality.

For External Stakeholders: GBV service provider communicates directly with the survivor regarding ongoing support and recovery services.

7

FOLLOW-UP & PROTECTION AGAINST RETALIATION



Provide ongoing support to survivor.

Bank monitors the workplace to ensure no retaliation, victimization or repeat misconduct.

Follow-up reviews may be undertaken at 30/60/90-day check-ins or as recommended by the GBV service provider.

8

REPORTING & REVIEW



- GBV service provider confirms case conclusion or transition.
- Bank closes the administrative case after corrective actions implemented.
- Human Capital maintains an anonymized SEAH register.
- Submit quarterly summary to management and the Board.
- Follow funder reporting requirements for internationally financed projects.



TIMEFRAMES

- Acknowledge receipt: Within 24 hours
- Investigation and decision: Within 30 working days
- Follow-up reviews: 30/60/90 days or as recommended

