

Complaints Policy

Preamble

Common Space is a nonprofit organisation building a satellite constellation, independently owned and operated from governments, to make high-resolution Earth observation (EO) imagery radically more accessible. Our mission is to ensure that communities, civil society, humanitarians, researchers, and citizens everywhere can use this data to protect lives, advance rights, and understand our world.

This Complaints Policy establishes how concerns about misuse of Common Space data or breaches of the Common Space Principles are reported, investigated, and resolved, and how Common Space maintains independent oversight and accountability. It is grounded in the Common Space Principles — particularly the commitments to transparency, accountability, human dignity, and do-no-harm.

1. Purpose

This Policy applies to all participants in the Common Space community — Observers, Members (both public interest and private sector), partners, sponsors, and staff — as well as to members of the public and affected communities who wish to raise a concern about Common Space or its data. It sets out:

- who may report a concern and how;
- the role and independence of the Ombudsman;
- the process by which complaints are reviewed, investigated, and decided; and
- Common Space's commitments to transparency in reporting outcomes.

Decisions regarding membership applications, terms, and terminations are governed by the Common Space Membership Policy; this Policy governs the process for reviewing and resolving disputes and violations that arise under those policies, including appeals.

2. Reporting

Anyone — including members, partners, non-members, and members of affected communities — may report a concern about misuse of Common Space data or a breach of the Common Space Principles. Reports may be submitted to Common

Space staff or directly to the Ombudsman. Established members' reports will be formally given additional weight in prioritisation, though no report will be dismissed solely on the basis of the reporter's membership status.

3. The Ombudsman

Common Space appoints an independent Ombudsman serving a three-year term to:

- Provide impartial and independent advice to the Board of Directors;
- Oversee the member-based Complaints Review Committee in any instance of a potential breach; and
- Oversee and advise on the grievance review and investigation process.

Where the Ombudsman has a conflict of interest in a particular case, they must recuse themselves and the Board will appoint an alternate.

4. Complaints Review Process

Minor issues (e.g. unpaid contributions) are handled at the staff level. Serious violations — including data misuse or harm caused to communities — are automatically referred to the Board.

Where the Board requires further investigation, a Complaints Review Committee is convened. The Committee must have a minimum of three members (odd number), including the Managing Director, and excluding any individual from the country or organisation under investigation. Committee members must declare conflicts of interest.

The process provides the accused member or partner with an opportunity to review evidence and respond. A final decision must be made within 60 days of the violation being reported. Decisions are by majority vote and may include suspension, removal, or conditions for re-application.

Applicants who are declined membership or partnership, or members and partners whose status is terminated, may appeal a decision by writing to the Ombudsman within 30 days of receiving the decision.

5. Transparency

Common Space is committed to transparency. The outcomes of complaints processes will be published, omitting personal or commercially sensitive

information. Where investigations reveal that laws have been broken, the appropriate authorities will be informed.

6. Policy Review

This Policy will be reviewed annually by the Governance Working Group, in consultation with the broader Common Space community. Any proposed material changes will be published for community comment for no less than 60 days before adoption. The current version of this Policy is available on the Common Space website.

Appendix A: Key Reference Documents

The following documents are referenced in or relevant to this Policy:

- Common Space Principles
- Common Space Member Agreement
- Common Space Membership Policy

Appendix B: Glossary

- **Complaints Review Committee:** A committee of at least three members, convened by the Board to investigate serious violations referred to it, and to reach a decision on suspension, removal, or conditions for re-application.
- **Good Standing:** The status of a member or partner who has met their financial obligations, complied with the Member Agreement and Common Space Principles, and is not subject to unresolved disciplinary proceedings.
- **Ombudsman:** The independent officer appointed by the Common Space Board to oversee complaints, grievances, and disciplinary processes.