



Positive Action for Development

**Organizational Beneficiary Feedback, complaints and
response mechanisms (CM)**

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1. Why Are Feedback, Complaint And Response Mechanisms Important For Our Accountability?

Most staff will have experiences of meeting people who are not fully happy with the work or behavior of PAD or partners in their community or region. Most of this feedback or complaint is received informally e.g., people approach staff who are visiting the community, or visit PAD's office in search of assistance or resolution to their problems or grievances. Even when PAD seeks feedback more formally during a participation or monitoring event, the responses received can often relate to a completely different topic. It is not unusual for staff monitoring a water and sanitation programme, for instance, to be approached about a food distribution programme taking place in the same community. It is also not unusual for staff of one agency to receive a complaint about another agency. Receiving feedback, suggestions and complaints about our work is normal, important and should be welcomed.

But what happens to these complaints? There are many positive examples of field staff immediately resolving issues whilst in the community, through conversation, sharing information or taking action on the spot. There are also many examples of more serious issues being conveyed back to the office and corrective action being taken. However, there are also many examples that show that staff, already overwhelmed with day-to-day emergency activities, find it difficult to manage the informal feedback and complaint they receive; complaints may not be prioritised, may be forgotten, or lost. A constant stream of visitors at the PAD field office interrupts works and can also add to the stress and frustrations of both staff and community members, who can be poorly dealt with or turned away. Tensions can arise when a complaint is received about a member of staff and it is not clear how this complaint will be dealt with and by whom.

In addition, the reality of humanitarian situations also means that sometimes vulnerable community members may find it difficult or impossible to complain through 'normal' participation or feedback opportunities, due to fear of retaliation or lack of trust.

What we aim for is a more **formalised system** of soliciting, receiving, processing and responding to the feedback and complaints we receive. Moreover, we aim to provide a **safe, non-threatening** and **easily accessible** mechanism that enables even **the most powerless** to make a suggestion or complaint. On the part of PAD, this requires us to address and respond to all complaints, and to be timely and transparent in our decisions and actions.

The opportunity for communities (both beneficiaries and non-beneficiaries) to provide PAD with their feedback and complaints, and in exchange to receive feedback or response from PAD, is an important part of being accountable. This also applies to other key stakeholders, such as our partners, or local authorities, and also to our staff.

A complaints mechanism is the newest and most visible part of an accountability system, and as a result can grab the attention of those keen to strengthen their accountability to disaster affected communities. However, accountability is about more than this. Having a complaints mechanism

should not mean that we put less emphasis on our ongoing efforts to involve women, men, girls and boys from day one of our response. (See section, link)

Whilst a formalised mechanism is a relatively new concept, experience has already begun to show that it can have enormous benefit for both communities and for PAD staff. It can help to establish a relationship of trust between staff and communities and improve the impact of our response. It can help save time and money that would otherwise be wasted. It can help build a safer organisation and safer environment for our staff, and for our beneficiaries, especially the most vulnerable amongst them. On the other hand, setting up a mechanism that does not function well (for example if complaints are not followed up) may contribute to frustration and worsening relationships with communities and local stakeholders.

A feedback, complaints and response mechanism can, for example:

Help PAD to:

- Learn from beneficiaries, communities and other stakeholders and be responsive to their views, opinions and complaints, so improving the quality and impact of our work
- Contribute to the real time analysis of the impact of our work, including satisfaction of beneficiaries, and the extent to which the most vulnerable are being reached and their needs met
- Identify problems as early as possible – from the less serious to the most serious, such as:
 - o Assistance not reaching the most vulnerable
 - o Assistance not having the desired impact or having unintended negative impacts
 - o Poor quality of relief items or hardware
 - o Poor process (e.g., identification of beneficiaries, or participation)
 - o Gaps in information provision
 - o Security issues
 - o Misuse of assistance by staff or communities (fraud or bias)
 - o Poor behaviour or attitudes of staff
 - o Sexual exploitation and abuse
- Protect the safety and dignity of those who make a complaint, as well as those who are complained about; and provide a non judicial but respectful means for addressing grievances, and the provision of redress where it is required
- Share information through the process of receiving and responding to feedback and complaints
- Support project and field staff to effectively manage feedback and complaints and to respond appropriately to less serious and more serious complaints, that can otherwise put certain staff under a great deal of stress
- Demonstrate our commitment to the rights of communities and our humility and commitment to achieving our goals

Help the most vulnerable community members to:

- Safely voice a complaint or grievance about CARE's programming or staff, and to receive redress if required
- Influence the progress, quality and impact of a project in their community
- Hold CARE to account

1. Some definitions

Feedback:

People have a right to have their voices heard in judging our response to their emergency. Asking for the views of the affected population can help us understand the difference we are making during the course of the response, and not just at the end of a project, or when the crisis is over (GEG)

Complaint:

A complaint is a grievance made by an individual(s) who believes that a humanitarian agency has failed to meet a stated commitment. This commitment can relate to a programme or project plan, beneficiary selection, an activity schedule, a standard of technical performance, an organisational value, a legal requirement, or any other point. Less serious complaint may relate to poor quality or performance, more serious complaint to fraud, abusive behaviour or sexual exploitation (HAP)

Whilst a complaint in itself is negative (a grievance), making and complaint and seeking redress can be a positive process.

2. How can we set up a formal and safe feedback, complaints and response mechanism?

Although setting up a CM is challenging, it usually means building upon existing systems rather than setting up something entirely new. A CM is an important part of our **monitoring systems**, operating alongside other monitoring activities.

Communicating clearly to staff, communities and government institutions about why PAD has a complaints mechanism, what it is for and how it works is absolutely crucial to its success. As such information sharing about the complaint's mechanism needs to be integrated into the **communication strategies** of programmes and the emergency as a whole. (Link to communications sections/information sharing with communities)

To the extent possible, the CM should also build upon local structures and systems of addressing complaints and dealing with grievances in the community. In the eyes of the user, this will facilitate and strengthen the legitimacy of the mechanism. At the same time, it is important to bear in mind power dynamics to ensure that vulnerable groups are not excluded. In emergencies we can work in new communities with existing community institutions or representatives that are new to us, and who may not represent those they *claim* to represent. Using such institutions or leaders as the *only* channel for complaint can exclude the most marginalised and most powerless. It is also important to consider the possibility of complaint about the misconduct of community members themselves, or of the staff working in the community. Relying on these same (often powerful) people as channels for complaint can also prevent people from lodging legitimate grievances.

Given the differences from one operation to the next, one standard CM cannot be developed to fit all programme contexts.

As much as possible, the CM should be designed with future sustainability in mind. A future scenario may be to have the system managed by local government, and incorporating the work of all actors in the area, with communities understanding how these NGO and government systems work, and able to demand the accountability that is their right.

3. Challenges, lessons learned and suggestions for good practice

Complaints procedures can be simple, although they need to be PAD fully planned and follow certain key principles. A badly designed or managed complaints procedure can be harmful. Here are 10 discussion points and suggestions for good practice to help establish a complaints mechanism

- That is **appropriate**
- That is **safe**
- That is **well understood**
- That **promotes transparency**
- That is **timely**
- That is **effective**
- That is **accessible to all**

(Link up to sections)

1. **Plan and budget** for a complaint's mechanism from the beginning of a project
2. Build **staff awareness and commitment** to a complaint's mechanism
3. Design a complaints mechanism made up of a **range of ways** people can complain
4. Design a complaints mechanism that can handle **extreme cases of fraud and abuse**
5. Be clear about the **scope** of the complaints mechanism and communicate this clearly
6. Develop a complaints mechanism **procedure document and always follow the established procedure**
7. Clearly **communicate** the complaints mechanism to all key stakeholders as part of overall information sharing systems
8. **Complete the feedback loop**: use the complaints data to improve overall performance and to provide feedback to communities (two-way communication and feedback)
9. Be clear on **roles and responsibilities** in managing complaints, and provide adequate training and support to staff
10. **Monitor** the complaints mechanism to verify that it is effective

1.2. **Plan and budget for a CM from the beginning of an emergency**

A CM is designed for the whole response and is adapted for different geographical areas and for the types of interventions in those areas. Ideally it is designed from the earliest stages of a response and continues sometime after PAD has exited from communities. Although many programmes will have been set up without a complaint's mechanism, it is still better to set them up later than not at all.

They require resources to set up and maintain. Complaints mechanisms should be planned and budgeted from the beginning of an emergency response (link to 'resourcing accountability' section) and built into project budgets.

Although a separate complaints mechanism is not required for each individual project, it must be seen as part of the core work of project teams, and not as something that is parallel to be carried out by dedicated accountability staff only (link roles and responsibilities section)

The challenges of setting up a CM for an emergency response will be much easier if emergency preparedness has addressed this issue and if CM is already a part of PAD's organizational make up (e.g. including its practice within long term programming).

Budget flexibility is needed in order to respond fully to some of the suggestions raised by beneficiaries. Set aside funds to help address complaints e.g. eligible beneficiaries who have been left off distribution lists. Budget flexibility by donors and by PAD is needed to help respond to suggestions raised by beneficiaries.

1.3. Build staff awareness and commitment to a complaint's mechanism

Staff commitment to manage and use a complaints mechanism is a critical factor for its success. Team discussions and awareness raising materials can be used to build staff understanding and appreciation of the importance of complaints. Issues to highlight to staff include:

- The rights of disaster affected communities
- PAD's organizational commitment to manage complaints
- The benefits and challenges of a complaint's mechanism

A complaints mechanism however always risks being seen as a threat by staff. In PAD Peru, fear amongst staff that the newly established complaints mechanism would threaten their jobs was an obstacle that needed to be overcome. This was eventually overcome through clear communication with staff about the complaint's mechanism, reassurance that a complaint received did not mean that staff would lose their jobs learning by doing, and a gradual acceptance that the complaints mechanism actually improved their relations in communities, and the quality of our work.

1.4. Design an appropriate complaints mechanism made up of a range of ways people can channel their complaint

Community members need to be able to submit complaints in ways that suit them and that takes power dynamics, cultural, geographical, and protection and safety issues into account. Women, men, children, the elderly, the non literate, people living with chronic illness, people with disabilities, communities located in remote areas all need to be able to submit complaints with relative ease and confidence. A range of measures may therefore be required to ensure that the mechanism is accessible to all groups, including the most vulnerable and socially excluded.

Staff can be a good source of knowledge about what methods could be appropriate in the context. Ask staff to anticipate the most common types of complaints and consider whether an information campaign could pre-empt and reduce these.

Consulting with community members and other stakeholders on appropriate methods is also important and should be carried out whenever possible. Involving other actors (partners,

government and communities) can also safeguard against excluded actors feeling threatened, and possibly undermining the process. Secondly it can help the agency to consider ways of handling complaints that already exist within existing national and local institutions and at the community level.

Although the process of designing and setting up a complaints mechanism can be as important as the system itself, setting up a system for the first time in an emergency may require a balance between inclusiveness and more directive action. PAD Peru launched their complaints mechanism with local authorities and communities as soon as possible after the earthquake struck in 2007. They made sure they explained clearly the purpose of the CM (e.g. to solicit feedback and complaint about PAD) and used this and as an opportunity for learning and dialogue with others.

Before consulting beneficiaries, staff should agree the local language terminology to be used and consider any context-specific sensitivities (e.g., when consulting communities where traditional leaders expect to be the sole channel of complaint, or when working in areas where security forces may be suspicious). During the consultation process, beneficiaries and their representatives should be provided with clear information regarding the purpose and rationale for complaints handling.

Methods used in recent emergencies include staffed telephone number, dedicated visiting hours in PAD offices and other location, post-boxes in strategic places in district centers, villages and PAD field offices, email service and village complaints and compliments book. In isolated communities, PAD and communities must be creative in finding ways to communicate, and direct contact and focus group discussion for the purpose of soliciting opinions, concerns and complaint with vulnerable groups may be a necessary solution (link case studies)

Is it necessary to use the word 'complaint'? There is often concern about promoting a 'culture of complaining' by using the word complaint (as opposed to feedback or suggestions). In some contexts, it can also be culturally inappropriate, or simply can be difficult to translate. However, it is good to take stock of this and challenge any assumptions. Welcoming complaints, as well as suggestions to help PAD improve its work, makes it clear that the agency is willing to provide redress when justified, and is a demonstration of humility in the face of our commitment to meet our principles and our goals.

4. Complaints handling when working through partners

When working through humanitarian partners, special consideration is required. The complaints mechanism needs to enable beneficiaries to complain to both the humanitarian partner and to PAD itself; as well as to enable the partner agency to complain to PAD about its own concerns. Consultation with partners is therefore crucial.

5. A complaints mechanism for staff

A complaints mechanism should also be in place to deal with staff complaints, which may also require a separate channel for complaint (see below).

5.1. Design a complaints mechanism that can handle extreme cases of fraud and abuse

Complaints mechanisms need to be designed to handle extreme cases of abuse. Although less frequent, extremely sensitive complaints about fraud, theft, violence, intimidation and sexual exploitation and abuse need to be handled by PAD.

All allegations of staff misconduct received from external stakeholders or other staff (also referred to as whistle blowing) must be investigated according to the official investigation procedures of PAD. PAD is required to have formal investigation procedures that adhere to the principles of confidentiality, independence and respect and that meet legal standards. The CM needs to provide clear assurances that sensitive complaints can be submitted through different channels (e.g. straight to the Human Resources Director or a nominated person) and that they will be treated separately and confidentially.

Know PAD's procedures for dealing with serious complaints against staff (link to PSEA chapter). Building Safer Organisations also provides guidelines on receiving and investigating allegations of sexual abuse and exploitation by humanitarian workers and details of the investigation process (link to PSEA chapter)

The idea is that trust in the system, and its confidentiality, will keep the number of anonymous complaints to a minimum as these will be much harder to investigate. However, anonymous complaints may still be received and the imperative to investigate serious complaints, such as sexual abuse of a project participant by a particular staff member, will present challenges. We need to keep learning about how to deal with such situations.

In the case of allegations of illegal activities, agencies may need to take legal advice, and in many cases may need to launch an investigation which may make the complainant reluctant to be exposed. Referral processes will also need to be in place.