

INTRODUCTION

Receiving and responding to feedback and complaints provides an opportunity to improve services and strengthen relationships with stakeholders as well as to test assumptions about community needs. This Briefing provides guidance for Caritas Internationalis Member Organisation (CI MO) staff and partners on how to set up and manage a complaints handling mechanism. The Caritas Internationalis Confederation is committed to the principle of *accountability* and to putting people and communities at the centre of our work, whether it is in our development, humanitarian or advocacy programmes and whether at community or organisational level.

The Caritas Internationalis Management Standards require CI MOs to have a complaints handling mechanism for staff, beneficiaries and other stakeholders¹. Similarly the Core Humanitarian Standard sets out a standard in relation to complaints: “communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.”

The Protection Mainstreaming Framework developed by CRS, CAFOD, Trócaire and Caritas Australia² states that, “Communities and people are able to provide feedback and make complaints in a safe, dignified and confidential manner, and receive an appropriate response when they do so”.

Feedback is important because:

- Programme participants are service-users with rights; they have a right to inform us if the services being provided are unsatisfactory
- Feedback can guide organisations to improve the quality of programmes
- Programme participants will feel more respected and valued if their feedback is listened to and receives a response
- Feedback helps participants stay safe, as they will feel able to speak out if the project is creating risks for them
- Staff feel motivated because feedback provides an opportunity to learn and improve programmes
- Listening and responding to feedback can increase security by identifying early tensions with certain members of the community
- Having a good feedback and complaints handling mechanism in place builds acceptance and a good reputation and reduces risks for organisations

The difference between feedback and complaints:

Feedback is information provided by programme participants (or other crisis-affected people) about their

1 The CI MS scoring criteria also references a whistleblowing policy. A whistleblowing policy establishes that staff who raise concerns of suspected serious malpractice are protected from dismissal, victimisation or any other detrimental treatment, provided that they follow the procedure set out in the policy. There is no legal requirement for a whistleblowing policy; it is sufficient to have a principle or statement about protecting individuals built into the complaints handling policy.

2 The Protection Mainstreaming Framework is in the [CI Emergency Response Toolkit](#). It sets out the steps for ensuring safety, dignity and access in international programming.

experience with an agency or the wider humanitarian system. It can be positive or negative, and posed as questions, an opinion, a suggestion or a complaint. Feedback may be collected through monitoring and informal channels as well as through a feedback and complaints mechanism. Feedback can be used for different purposes, including to improve the response.

Active Learning Network for Accountability and Performance (ALNAP) defines a feedback mechanism as effective when it “supports the collection, acknowledgement, analysis and response to the feedback received, thus forming a closed feedback loop.” Closing the loop is also the essential feature of an effective complaints handling mechanism.

Complaints are specific grievances from anyone who has been negatively affected by an organisation’s action or who believes that an organisation has failed to meet a stated commitment. Complaints can alert agencies to serious misconduct or failures in the response.

Complaints require an additional level of systematic management in order to ensure that: the complainant and those affected are safe at all stages; the details of the complaint remain confidential; sensitive complaints are handled fairly and appropriately; the necessary action is taken in a timely manner; a response is shared back with the complainant, the community and stakeholders appropriately; and there is continuous learning and improvement.

	CATEGORIES	NAME OF THE CATEGORIES
Non-sensitive Project	1	Question
	2	Positive feedback
	3	Suggestion
	4	Complaint
Sensitive Staff / People	5	Allegation of fraud
	6	Violation Code of conduct by a staff or partner
	7	Allegation of abuse not committed by a staff or partner
	8	Non-valid feedback

Figure 1 Catholic Relief Services Accountability Feedback and Responses

Non-sensitive Feedback and Complaints relate to programme activities or funding and should be resolved by programme staff or addressed by the relevant teams.

Sensitive Complaints relate to issues of corruption, exploitation, abuse, misconduct, negligence or any other abusive or inappropriate behaviour by staff, volunteers or affiliates. They need to be treated urgently and confidentially by senior staff within the organisation. Sensitive complaints regarding other organisations should be transferred to those organisations to be managed according to their complaints handling procedures.

Non-valid feedback or complaints are those that have been through a verification process and have been found to be unsubstantiated, including malicious and vexatious complaints. The complainant should be informed that their complaint was found to be non-valid.

PRINCIPLES FOR A FEEDBACK AND COMPLAINTS HANDLING MECHANISM (FCHM)

Participation: Involve people at every stage. A successful and effective FCHM can only be achieved if it is developed in a participatory way with representatives from all stakeholder groups including the most vulnerable and excluded.

Contextualisation & Appropriateness: Mechanisms for handling complaints must be appropriate to the specific context within which they are intended to operate. It must be in keeping with local legislation and fit with the specific nature of the programme being implemented.

Safety: A safe FCHM considers potential dangers and risks to all parties involved in each process, including staff, complainants, witnesses and other parties involved. The mechanism should be designed to incorporate ways to prevent harassment, injury or harm to those wishing to raise an issue or complaint.

Confidentiality: Privacy is a fundamental personal right. Therefore, it is crucial that we ensure confidentiality of programme participants when managing their complaints. Confidentiality helps create an environment in which people are more likely to raise concerns, complain or stand witness to bad practice or incidents of abuse. People might not raise concerns or complaints if they are in fear of reprisal or retaliation. Confidentiality assures that any information given is restricted to a limited number of people on a need-to-know basis and that it is not disseminated more widely.

Objectivity: Feedback and complaints are dealt with objectively and with procedural fairness.

Transparency: A FCHM is transparent when all users are aware of the procedures; they understand its purpose, have input into its design, have sufficient information on how to access it and understand how it works. Information about complaint mechanisms should be freely available and people with concerns should be able to speak regularly and openly to staff about the operation of mechanisms.

Accessibility: A FCHM should be safely accessible for all groups within the community, including the most vulnerable and those with disabilities; this may mean establishing multiple channels to ensure everyone can be reached.

STEPS FOR SETTING UP A FEEDBACK AND COMPLAINTS HANDLING MECHANISM

The essential features of any mechanism is that it includes receiving feedback, acknowledging it, analysing it, and responding to it.

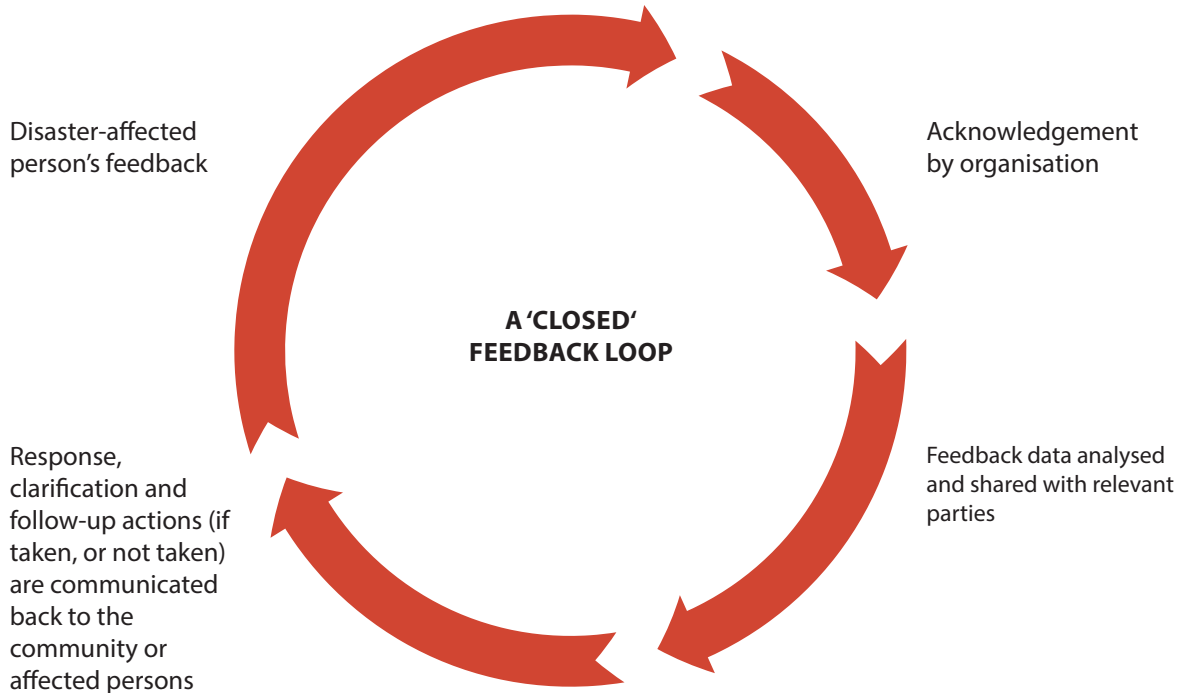


Figure 2 is the ALNAP "closed feedback loop".

While feedback is gathered through informal and formal channels and regular monitoring, complaints require a dedicated mechanism. There are twelve recommended steps for setting up a complaints mechanism³. These are:

1. Secure the commitment and support of senior management
2. Consult with project participants, host communities and other stakeholders
3. Develop a policy based on community input and organisational or programme resources
4. Train staff on feedback and complaint handling
5. Sensitise community on the feedback and complaint handling process
6. Receive feedback and complaints
7. Log and acknowledge feedback and complaints
8. Consult, review and investigate feedback and complaints
9. Take action and respond
10. Provide the opportunity to appeal the decision

3 Adapted from Core Humanitarian Standard (CHS) Alliance

11. Review trends, report to management and adjust programme accordingly
12. Review effectiveness of the feedback and complaints system and make adjustments

A feedback and complaints handling mechanism needs to exist at organisational level and at project level. Organisational FCHMs need to be designed, implemented and monitored in consultation with staff, volunteers and partners as well as with community members. CI MOs must welcome and respond to complaints which relate to their own activities as well as those of a partner or contractor. The project level and organisational level CHMs are closely interlinked.

THE STEPS IN MORE DETAIL

1. SECURE THE COMMITMENT AND SUPPORT OF SENIOR MANAGEMENT

Leadership commitment to effective complaints handling is essential in order to have an effective mechanism which is safe, accessible and responsive for staff, stakeholders, people and communities. Staff must be aware of their own right to complain, what about and how, in order to be able to promote complaints mechanisms in communities. As part of this organisational commitment there should be awareness raising for staff of sexual exploitation, abuse, fraud and corruption and abuse of power.

2. CONSULT WITH PROJECT PARTICIPANTS, HOST COMMUNITIES AND OTHER STAKEHOLDERS

Complaints mechanisms should be developed based on a participatory process of consultation with the community, or, in the case of an organisational mechanism, with staff and partners, and consideration of the legal and regulatory requirements. The consultation process should solicit input on the following:

- Existing systems and structures for community feedback and complaints e.g. are community complaints handled by a community leader or a community committee? What are the preferred channels for complaints and how accessible are they to different groups in the community? What are the language groups, literacy rates, profiles of people with access to telephones and barriers to social inclusion?
- The perception of complaints and the ways in which community members express dissatisfaction. Is feedback (positive and negative) more acceptable? Are people more comfortable sharing comments and suggestions rather than complaints?
- Potential security risks for project staff, stakeholders and project participants. For community members, fear of retaliation can range from a concern that the individual or their community will be excluded from assistance to the fear that they will be persecuted for complaining.

3. DEVELOP A POLICY AND PROCEDURES BASED ON COMMUNITY INPUT AND PROGRAMME RESOURCES

The policy and procedures set out the key characteristics of the mechanism, who is responsible for receiving and handling complaints (a team, a committee or an assigned individual depending on the context of the community and the organisation). Procedures should set out:

- How feedback will be recorded, reviewed and actions communicated.
- Who has access to what information. This should differ for sensitive and non-sensitive complaints.
- Response time targets (for example 7 days for non-sensitive complaints).
- How to manage feedback that relates to other organisations.

Whatever the mechanism, no one person should have overall control, as the complaint could be about that person (can the person who opens the feedback box hide the complaint if it is about him/her?). Complaints boxes should have two keys held by two different people and emails should be received by two people.

The policy or guidelines should clearly articulate, or signpost to, the process for managing sensitive complaints. The person receiving the sensitive complaint should be clear on the internal reporting mechanism and should report directly to the relevant person, unless the complaint is about that person.

The complaints policy or guidelines should allow for a complaint to be received and managed in relation to anyone in the organisation, even the director.

Different ways to gather feedback and complaints are set out in Table 1 (p. 11). The design of the mechanism has to take into account the resources (financial, staffing and skills) required for collecting and analysing information received.

4. TRAIN STAFF ON FEEDBACK AND COMPLAINT HANDLING

Training needs to build the attitudes, knowledge and skills for feedback and complaints handling. Staff must understand the importance of welcoming and receiving complaints, and that a high number of complaints does not mean failure, rather the opposite. Staff need to know how to consult with communities, design, implement and monitor a feedback and complaints handling mechanism. Staff must know their responsibility to report any concerns they have regarding colleagues or partners involving sexual exploitation or abuse (SEA), they should know what to do if they receive a sensitive complaint, the importance of keeping it confidential and not to try to investigate it themselves.

Training for staff on consulting with vulnerable groups, e.g. children or people with disabilities, can make interaction with different groups more effective and promote a safe atmosphere for receiving complaints. Annex 2 is a Focus Group Discussion Guide for community consultation on the design and monitoring of FCHM, information sharing and community engagement.

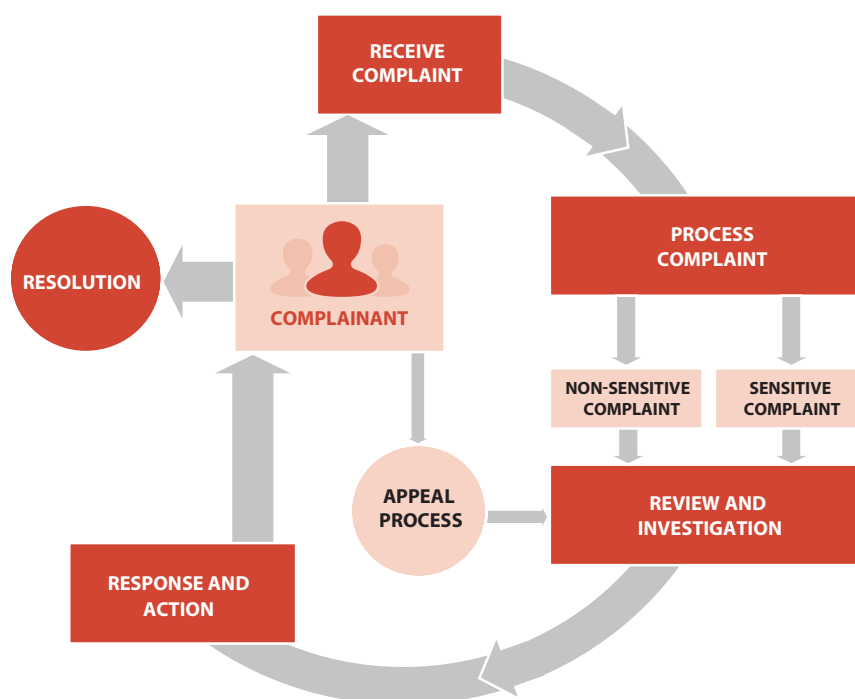


Figure 3 A standard process for handling complaints⁴

4 CHM - A Guide for CAFOD staff to accompany partner organisations to set up CHM within international programme activities, version 1.0, June 2010.

5. SENSITISE THE COMMUNITY ON THE FEEDBACK AND COMPLAINTS HANDLING PROCESS

The complaints-handling process for communities and people must be explained, widely advertised and shared among the community. It should be very clear to the community how, practically, they can complain or provide feedback. The process should cover programming, expected behaviours of staff and volunteers in the community, sexual exploitation and abuse, and other abuses of power. People and communities should be aware of the expected behaviour of CI MO staff and volunteers, including organisational commitments made on the prevention of sexual exploitation and abuse.

Tip: make sure that you actively communicate with different groups in the community to ensure everyone knows about the mechanism including the most vulnerable. This is also an opportunity to gather input on how well it is working.

6. RECEIVE FEEDBACK AND COMPLAINTS

Feedback and complaints may be received by staff who are interacting with the community or stakeholders, or through dedicated channels such as hotlines, suggestions boxes and helpdesks. The mechanisms must be regularly checked to ensure feedback and complaints are received in a timely manner. The confidentiality of communication should be guaranteed as appropriate.

Sensitive issues requiring immediate attention should be identified.

If complaints are managed or reported to community leaders or committees there is a need to establish clear frameworks for referral and confidentiality, so that complaints against staff or volunteers are kept confidential and only managed by the organisation or through agreed investigation procedures.

7. LOG AND ACKNOWLEDGE FEEDBACK AND COMPLAINTS

A system should be set up for logging, tracking, recording and reporting on complaints. Annex 1 is an example of an Excel template for logging complaints. 'Sensitive' complaints may be logged in a separate, password-protected file.

Codes may be assigned to different types of issues raised (e.g. quality of project inputs, or challenges with use of assistance items provided, feedback on coverage and targeting, or requests for additional or different type of assistance). See Figure 1. Feedback from community meetings or focus group discussions should not be overlooked or overshadowed by feedback collected in more concise numeric forms (e.g. through surveys and monitoring logs), which can be easier to sort through and enter into databases.

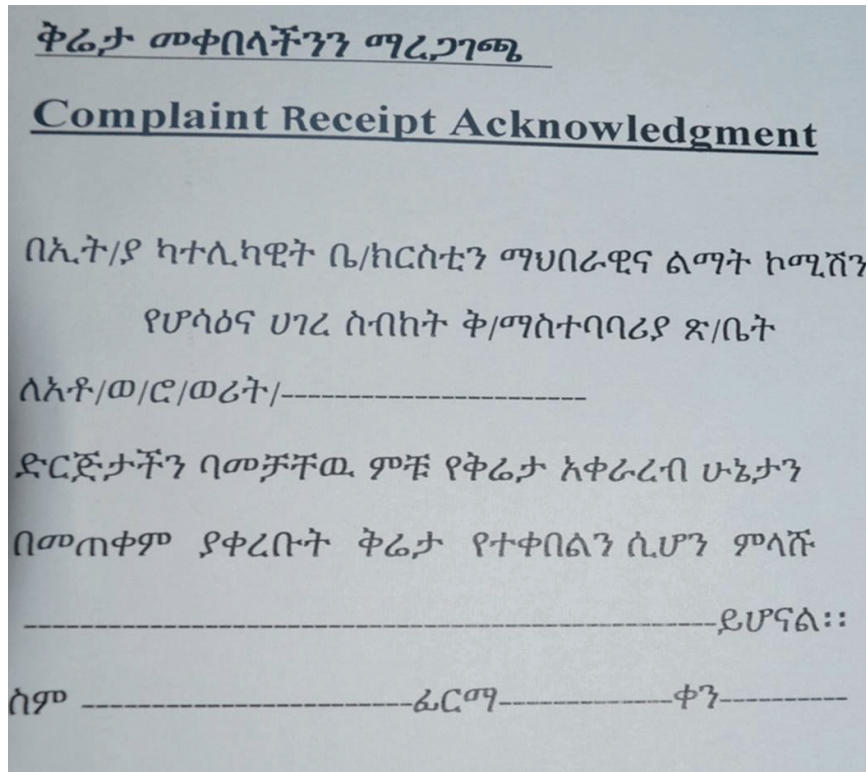
Organisations may wish to disaggregate feedback by sex, age and diversity (e.g. disability). This will enable the organisation to analyse feedback trends and identify if there are any specific issues faced by these groups.

Anonymous complaints are those where the person affected or complainant is not known. Anonymous complaints must be treated seriously and investigated, because they may be about abuse or harm.

Care must be taken to ensure that information on complaints is kept in strict accordance with data protection policies, and that information is only stored for as long as is needed.

The Diocese of Hosanna in Ethiopia has introduced a receipt book for field staff who receive feedback or complaints during field monitoring.

They have trained complaints handling committees at *woreda* (local division) and *kebele* (ward) levels. A complaint registration book in each *woreda* is used for registering, tracking and learning from feedback.



8. CONSULT, REVIEW AND INVESTIGATE FEEDBACK AND COMPLAINTS

Feedback data needs to be checked and verified in order to provide reliable information, for example by triangulating feedback from different sources, and cross-checking with clusters or in coordination meetings. It needs to be passed to the staff with the corresponding duties to act on.

All complaints need to be reviewed and addressed. Non-sensitive complaints can be resolved or addressed by the programme or support teams, often after a verification visit.

Sensitive complaints should be managed differently. They require management follow-up and possible investigation. If an investigation is required, it is advised that it is undertaken by individuals who are trained on sensitive investigations such as allegations of SEA. Not all organisations will have internal expertise to undertake investigations and if this is the case, the organisation should map in advance where and how they can access external specialist support (which services and agencies, their locations and their fees or requirements).

Any investigation of a sensitive complaint should be conducted in a way that does no harm and maintains the integrity of the FCHM. The process is broadly outlined below.

A risk assessment identifies potential harm to the concerned parties, including the person allegedly affected, the complainant, the witnesses, any local investigation team members and the subject of the complaint. Risks include physical harm, sexual infections, psychological trauma and economic loss. The risk assessment determines whether the immediate health and protection concerns of those involved should be addressed, for example by providing psychosocial support.

Once the participants in the investigation are safe and the evidence is secure, confidentiality is the priority focus of the investigation team. Confidentiality is important because it protects the privacy and safety of all the people involved in the complaint.

For sensitive complaints, the complainant should receive confirmation that the complaint has been received and action is being taken within five working days of making a complaint.

The investigators need to establish which rules (national employment law, employment contract, code of conduct) have been allegedly broken and identify the evidence relevant to each rule. The investigation

needs to prove in the balance of probability that the alleged incident did or did not occur. The investigation report presents the conclusions of the investigation and must be kept confidential. The investigation manager recommends what action to take.

Complaints related to fraud and corruptions follow the same process as complaints related to sexual exploitation and abuse, according to the policy on fraud and corruption.

9. TAKE ACTION AND RESPOND TO THE PERSON WHO COMPLAINED

Feedback should be analysed alongside other data, e.g. assessment, monitoring and coordination data and used to make decisions and adjust how activities are planned and implemented. Feedback may lead to further assessment or monitoring, or it may be shared with other organisations, or it may be used for advocacy and communications. The more far-reaching the potential change, the more important it is to verify the feedback with other sources.

Summaries of the feedback received and the actions taken can be posted in the community, and shared in community meetings or through other channels.

Complainants need to be informed that their complaint has been received and then that it has been addressed or closed. Responding to anonymous complaints is often impossible to do in an individualised manner but, where appropriate, communal meetings or announcement boards can be used to respond to questions and criticisms that have been submitted anonymously.

For sensitive complaints, the communication should be planned before the investigation starts. The Subject of Complaint is informed of the outcome of the investigation in writing and if the complaint is not substantiated the letter must not disclose the names of any witnesses, informants or the complainant; the complainant is told whether the complaint is substantiated or not; and witnesses are told that the case is closed. If the complaint is upheld, then the organisation has a duty of care to the victim/survivors/s.

In NASSA/Caritas Philippines, the Diocesan Caritas of Palo trained community-based accountability teams. There was an emphasis on informing the community of their right to complain and their right to receive a response. Community boards provided the mobile phone numbers of the community organizers and the MEAL Officer, and these were also given to the local leaders.

In one community three farmers complained about the quality of carabaos or water buffalos distributed as part of the livelihoods project. They sent letters via the local leaders. They were expecting a mature animal that they could use for land preparation, but the animals were young and would take five more years to be useful as farm animals.

Caritas staff met with the complainants and listened to their grievances. The farmers explained that raising a young carabao required skills and experience that many of them did not possess, and they urgently needed assistance with land preparation since they lost all their farm equipment.

As a result of this, with the agreement of the three complainants, a community meeting for all farmers was held. The feedback was validated by the large majority. Two decisions were made by Caritas Palo and the farmers:

- To let experienced members take care of the young carabaos, until they were mature enough for communal use
- To distribute tractors to the farmers so that they were able to prepare their land.

Both of these were successfully implemented.

10. PROVIDE AN OPPORTUNITY TO APPEAL THE DECISION.

If the response is not accepted and a resolution cannot be reached between the parties concerned, the complainant may wish to appeal against the response. The appeal process will re-examine the investigation process already taken and determine whether to uphold the original decision or make a new decision based the findings of this review.

The appeals process should be clearly defined: when it can be used; how it will work and who will be involved in it. The appeals process, where it is invoked, checks whether the initial decision or response was appropriate. The appeal should be conducted by a different set of people from those involved in the original investigation.

The complaints handling policy should set out the appeal procedure and the level of final appeal, including whether it is with the partner or the donor.

11. REVIEW TRENDS, REPORT TO MANAGEMENT AND ADJUST PROGRAMME ACCORDINGLY

Programme management meetings should include time for discussion of feedback and complaints and for deciding how the programme should be adjusted and improved. Then staff should track whether the same feedback or complaint keeps reoccurring or whether it is no longer an issue after the mitigation methods have been adopted.

Feedback collection, response and use should become part of how an organisation carries out its activities. Senior managers can demonstrate the importance of feedback and complaints by taking a direct interest in hearing about and trying to respond to feedback, questions and complaints.

12. REVIEW THE EFFECTIVENESS OF THE FEEDBACK AND COMPLAINTS SYSTEM AND MAKE ADJUSTMENTS

Learning events should review the feedback and complaints handling mechanism, alongside the monitoring system and other accountability mechanisms. Community consultation should provide ideas for how the system can be improved. Feedback and complaints should be reviewed and analysed to identify who is most likely to raise an issue and why, what has been done about it, whether issues are resolved and what else should be done.

Tip: Take time to see if you are receiving feedback and complaints from different groups in the community. For example, if you are mostly receiving complaints from men, you should examine whether your system is accessible to women, children and elderly.

Hosanna Diocese, Caritas Ethiopia

The complaint handling process and the system has been evaluated and the findings of the evaluation led to improvements in several areas. AV Hosanna also conducted two self-assessments on protection mainstreaming which included action planning for improvements.

Further Resources

Protection Mainstreaming Facilitation Pack in the [CI Emergency Response Toolkit](#)

Guidelines for Investigations, CHS Alliance

Closing the Loop: Effective Feedback in Humanitarian Contexts, by Francesca Bonino with Isabella Jean and Paul Knox Clarke, ALNAP-CDA Guidance

TABLE 1		
WAYS TO GET FEEDBACK	BENEFITS	CONSTRAINTS
Suggestion/Complaints Box (locked)	<ul style="list-style-type: none"> Feedback can be submitted at any time. Children and caregivers can provide anonymous feedback. Because feedback is in writing, there is less room for misinterpretation. Feedback can be kept confidential. Box can be placed in schools or local councils' meeting areas. 	<ul style="list-style-type: none"> Because feedback is written, this method can be used only by literate groups. Users do not get immediate feedback or guidance on procedures. Regular collection and follow-up responses are required. Local councils cannot be involved in opening boxes because complaints may concerns them.
Open-Door Hours - Fixed hours or days when office is open to receive complaints	<ul style="list-style-type: none"> Staff may be able to provide advice or solve problems on the same day. Opportunity to work with groups of children is provided. 	<ul style="list-style-type: none"> Many people may come to provide feedback at the same time, so the office could become crowded and noisy. Method might be inconvenient for community members to access. People may not have enough privacy while expressing their concerns.
Logbook - Completed during field visits	<ul style="list-style-type: none"> Quick setup. Cheap and does not require lots of training. Allows staff to consolidate major issues daily. 	<ul style="list-style-type: none"> Not systematic. Relies on staff to record information, recall details, and prioritize. Cannot be tracked easily.
Free Telephone Line	<ul style="list-style-type: none"> Accessible to nonliterate users. Provides a level of anonymity and security. 	<ul style="list-style-type: none"> It may be difficult to promote the hotline because of security considerations. It's not easy for children to access. Someone must be available to answer the phone at agreed times. If it is not a free hotline, calling costs may deter people.
Help Desk Linked to Distributions	<ul style="list-style-type: none"> Easy for people to access; they do not have to make a special journey. Can reduce tensions and build trust between community and project staff. Can talk to beneficiaries, rather than rely on views of community leaders. 	<ul style="list-style-type: none"> May be crowded, and tensions can be high. May not offer enough privacy for people to express their concerns or present their feedback. May make people reluctant to criticize if they are about to receive assistance. May not be appropriate for children if they do not attend distributions.
Email Submission	<ul style="list-style-type: none"> Can be appropriate for stakeholders complaints or complaints directed to HQ. Ensures confidentiality and the option to remain anonymous, if preferred. 	<ul style="list-style-type: none"> Some people may not have access to the internet in program areas.
WhatsApp or Facebook Messaging (or other social media or mobile-based applications)	<ul style="list-style-type: none"> Apps are very effective for engaging with younger people. No cost is involved. Most NGOs use WhatsApp and have a Facebook page. Apps work with low bandwidth. 	<ul style="list-style-type: none"> System may exclude older people. A system for monitoring messages is needed. It's important that feedback is not shared publicly. Some people may not have internet access.
Community Meetings	<ul style="list-style-type: none"> Feedback can be discussed and potentially addressed on the spot. 	<ul style="list-style-type: none"> Good for general feedback, but does not allow sensitive feedback to be raised.

Source: Mercy Corps' Cornerstone training on CHM

**ANNEX 1 SAMPLE TEMPLATES FOR MANAGING TRACKING AND MONITORING
FEEDBACK AND COMPLAINTS**

**ANNEX 2 COMMUNITY MEMBER KEY INFORMANT INTERVIEW / FGD SAMPLE
QUESTIONS**