Complaints Handling Mechanisms (CHM)

A guide for CAFOD staff to accompany partner organisations to set up CHM within international programme activities

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Introduction

This document's four sections are intended to guide CAFOD staff when accompanying CAFOD's partners to set-up and implement a Complaints Handling Mechanism (CHM) for beneficiaries and other stakeholders of a project and/or programme. The structure of the guide is as follows:

1. Basic Concepts (2 pages). The first section presents the basic concepts underlying complaints handling. It gives definitions as well as setting out some of the core principles to consider when setting up a CHM.

2. Consultation, Participation and Information sharing (3 pages). This looks at: the importance of how to approach setting-up a CHM with user groups; what constitutes a valid complaint; the difference between sensitive and non-sensitive complaints; and the information that needs to be shared before setting up a CHM.

3. Designing and Implementing a CHM (5 pages). This outlines the main features required and looks in detail at the various aspects of implementing a CHM: the receipt, tracking and recording complaints, processing, review and investigation of complaints, the response to the complainant(s) and the appeal processes. It also covers some of the principles underlying investigations, responses, appeals and information provision to users of the CHM and other stakeholders.

4. Monitoring, Reviewing and Learning from Complaints (2 pages). This last section looks at how to check that a CHM is working effectively and efficiently. It also provides some guidance on how to use the information from the complaints themselves to inform and improve organisational and programme work and approaches.

How to use this Guide

The four sections of this document are designed to provide programme staff in CAFOD with guidance and support when accompanying partners through the process of setting-up a CHM. There are references to suggested tools and case studies that may offer some guidance to assist with the challenges and issues that can arise when implementing a CHM.

Staff using this Guide should ensure that they are familiar with the **general principles of accountability** to which CAFOD is committed as part of our membership and certification with HAP International (See Annex 1). Staff should also have a good understanding of the policies, standards and codes that CAFOD is committed to upholding (See PCM Guidance Notes: Standards of Accountability)

Discussions held as part of previous programme development processes (e.g. CAFOD's POP, PCM and Accountability Checklist, Minimum Standards and Accountability Planning Tool) can provide a good understanding of a partners values, commitments and plans. They can also help identify programme stakeholders, what measures are already being taken with regard to accountability and how these can support the process of setting-up a CHM. See Annex 4 "Useful Tools" and Annex 5 "Case Studies" for further guidance.

Key CAFOD related documents

- CAFOD Complaints Handling Policy
- PCM Guidance Notes: Standards of Accountability
- Accountability Check List, Minimum Standards and Accountability Planning Tool

1. Basic Concepts

1.1 Accountability

For CAFOD, accountability means taking responsibility for listening to the needs, concerns and views of our supporters, donors, partners and the communities that we serve. We are committed to act on what they are telling us and to be answerable to them for the decisions we make and the actions we take. It means that we strive to improve the quality, learning and effectiveness of our international programmes as we place our partners and the communities that they serve at the centre of our work. At its heart, being accountable is about how we relate to people - men, women and children - with dignity and respect.

Handling feedback and complaints is an essential part of any organisation's commitment to being accountable to its stakeholders. At CAFOD we are committed to learning and improving, and encourage partners and stakeholders to comment on the progress and effectiveness of our work. Our feedback and complaints mechanisms support our culture of accountability enabling us to improve the quality of our programmes and the relationships we build with partners and communities.

CAFOD is open to receiving honest feedback and complaints, and considers them as opportunities for learning, improving and developing. CAFOD wants to encourage staff and partner organisations to:

- recognise that mistakes can be made and commit to learn from them
- do more than just "listen" to stakeholders, especially programme beneficiaries
- work to shift the power balance more towards those receiving assistance and support
- check that they are being held to account

CAFOD and partner staff receive and collect feedback and complaints as a regular part of programme monitoring and evaluation activities. Often minor issues that are raised in this way can be dealt with informally but where there is concern of a more serious nature or someone wants to more formally report something that concerns them, then a Complaint Handling Mechanism (CHM) will provide a safe way for them to do so, and for us to take appropriate action in response.

An effective Complaints Handling Mechanism (CHM) can serve to hold CAFOD or partners to account against the promises and commitments made to beneficiaries and stakeholders. It can offer checks as to whether specified goals are being met and can provide early warnings that things might be going wrong. From information received through a CHM, well-timed changes can be made or decisions taken to remedy situations or mitigate against potential problems.

It is essential that any CHM works for the people it is intended for. Therefore it must be culturally and contextually appropriate to the specific situation where programme activities are implemented. Local forms of communication and governance structures need to be taken into consideration when designing and implementing a CHM. If local ways to handle complaints exist, which are effective and safe for people to use, then these can be used or can be integrated into a CHM.

1.2 What is feedback and complaints?

Feedback is a comment or concern that can be positive or negative but does not require a formal response. Feedback provides useful insights into how project activities are perceived or how they

are being implemented. Feedback of this nature can be addressed informally during programme monitoring visits or can be referred to management staff to if necessary.

A **complaint** is an expression of dissatisfaction about the standard or quality of assistance being provided and is related to the actions or lack of actions taken by staff or volunteers that directly or indirectly cause anyone distress.

Complaints are directly associated to the commitments made by an organisation, in terms of what and how it promises to deliver assistance and give support. People on the receiving end of assistance and support have the right to complain if standards are not being met, if assistance is not appropriate to them or are not as promised to them by implementing organisations or there are serious breaches of codes of conduct. A formal complaint demands a response and an organisation receiving a complaint has a duty to respond to the complainant.

It will be the responsibility of programme staff receiving feedback and complaints to determine how serious in nature they are and whether they can be dealt with informally verbally straight away or if they need to be dealt with formally.

1.3 Principles

People wishing to make a complaint or raise a concern will only do so if they have confidence that complaints will be dealt with promptly, fairly and without risk to themselves or others. The fear of retaliation (getting back at a person for complaining) can range from a concern that they or their community will be excluded from receiving aid by the organisation, to the fear that they will be personally persecuted for complaining. In some situations e.g. conflict or volatile contexts, this may be particularly acute and needs careful consideration.

To ensure that a complaints system is effective, trusted and therefore used, depends on following some key principles:

- **Participation:** A successful and effective system will only be achieved if it is developed in a highly participatory way with representatives from all stakeholder groups and if it is fully integrated into programme activities. People, or user groups, need to be involved in each stage of the processes from design to implementation and review.

- **Contextualisation and appropriateness:** Any process to develop a system must be localised in order that it is appropriate to the local context, be in keeping with local governance structures and fit within the specific nature of the programme being implemented. Again this will only be achieved if the mechanism is designed in a participatory way in consultation with its potential users and other stakeholders.

- **Safety:** To ensure that people are protected and are safe when wanting to raise a concern or complaint, the potential risks to different users need to be carefully considered and incorporated into the design of a CHM. Ensuring the safety of those using the mechanism is essential if it is to be trusted and used effectively.

- **Confidentiality:** To create an environment in which people are more likely to raise concerns, trust the mechanism and feel confident that there will not be reprisal or retaliation if they use it, confidential processes need to be assured. Confidentiality helps to ensure safety and protection for those making, and those affected by, a complaint. This is achieved by restricting those that have access to sensitive information.

- **Transparency:** Users must be clearly informed how they can access the CHM, and the various procedures that follow once they do so. It is important that the purpose and function of the mechanism is transparent.

- **Accessibility:** It is essential that the mechanism can be accessed by as many people as possible within any stakeholder group, especially those who are often excluded or are most marginalised, or vulnerable. Where the risk of exclusion is high, special consideration must be given to safe mechanisms that do not require literacy.

Experienced staff will recognise these principles as elements of normal good practice in development and humanitarian work, and in many cases will already be applying them. The purpose of establishing a CHM is to build on this good practice and formalise how complaints are managed to ensure consistency and accountability.

2. Consultation, Participation and Information Sharing

As we have seen in Section 1, a CHM must be clear to potential users and other stakeholders, and culturally appropriate to the local situation. To achieve this objective staff need to involve stakeholders and beneficiary communities in the key stages of developing a CHM through consultation and by encouraging participation in the process. This section discusses some of the key issues that need to be considered and makes some suggestions about methodology.

2.1 Consultation and Participation

Involving beneficiary communities and other stakeholders in any activity and decision that impacts upon them ensures that activities are in line with needs, helps create ownership and can play an important role in empowering people to take control of their lives. Therefore it's important that beneficiary communities and other stakeholders are meaningfully involved in developing a CHM: from planning and design, to its implementation and evaluation. This means more than simply sharing information and consulting alone; it requires us to listen to stakeholders' views and opinions and making adjustments accordingly. As far as possible, decisions about how the CHM will work should be made jointly with the user groups (see Annex 2 "Participation").

Providing a mechanism for people to complain may go against existing customs and structures, or there might be a stigma attached to complaining. Involving users in the design process is a good way of ensuring complaints mechanisms are sensitive to such factors. Existing power dynamics and local governance structures within stakeholder communities need to be recognised and understood in order that appropriate ways to make a complaint are identified to ensure equal access to a CHM by all potential 'users'. In challenging local power structures however, sensitivity and diplomacy are vital, and where this is necessary CAFOD will rely on the experience of its senior regional staff and trusted stakeholders.

Key issues to consult on with stakeholders

i. Defining a valid complaint

It is important to have clarity on what constitutes a complaint within the scope of the activities being implemented. A valid complaint is one that relates directly to the commitments and promises made by CAFOD or the partner and issues that are under the control of CAFOD or partner. It is therefore essential that all staff have a clear understanding of what commitments *(mission statement, values, organisational strategies, project/programme plans and other codes of conduct or guidelines e.g. RCCC, Sphere)* have been made to beneficiaries and other stakeholders.

Complaints or comments that relate to issues outside the control of CAFOD or CAFOD's partner can be referred to other agencies considered responsible, but CAFOD or the partner cannot accept responsibility for how other institutions treat complaints.

ii. Understanding sensitive and non-sensitive complaints

A CHM needs to handle complaints on all issues from beneficiary entitlements to serious grievances such as corruption, sexual harassment and mismanagement. In order to manage complaints appropriately CAFOD classifies complaints into 'sensitive' and 'non-sensitive'.

A **non-sensitive** complaint concerns the implementation of activities, decision taken, or advocacy / policy position held by CAFOD or a partner. A **sensitive** complaint is typically a complaint about corruption, sexual exploitation or abuse, gross misconduct or malpractice. Given the risks associated with coming forward with sensitive concerns, the CHM needs to be designed in such a way that complainants feel safe to do so. Stakeholders might have specific ideas as to how to overcome this potential barrier which could be incorporated into the design of the CHM.

By giving assurance to users that sensitive complaints will handled confidentially and without retaliation by the organisation, a degree of protection to the complainant can be guaranteed. It is therefore important to communicate with stakeholders about how each type of complaint will be handled according to organisational policy and practice. A partner may have policies already in place to manage complaints about some specific issues (e.g. fraud, corruption, staff conduct etc) and these practices can be part of any CHM, provided they are effective and safe for users *(Refer to CAFOD's Complaints Handling Policy and Procedures for example of how CAFOD handles different types of complaint).*

iii. Who will be the main 'users' of a system? The main users are likely to be the end-beneficiaries. However the mechanism should not be restricted to direct beneficiaries but also include potential, indirect or non-beneficiaries as they too have an interest in the work of the organisation and are affected by it. Developing a detailed stakeholder analysis of the stakeholder community can provide useful insights and understanding of the community structure. From this information the CHM can be designed to ensure that all groups are offered the most appropriate way for them to best access the CHM.

iv. What are the barriers to raising concerns / making a complaint? Potential users may have concerns or 'barriers' to their willingness or ability to complain. It is essential to understand what these are and to come up with the most effective ways that they can be minimised or overcome. Information from the stakeholder analysis can be used to consult with and involve a wide-range of users particularly those that are often marginalised or most vulnerable, to ensure that all members of user-groups are able to raise a concern or complaint safely and confidently.

While the specific form of a complaints procedure will vary depending on context, below are some examples of how other organisations and stakeholders have approached the issue.

Examples from other organisations

- Complaints boxes within communities where beneficiaries can make anonymous written complaints
- An appeals process that individuals who are not selected as beneficiaries for a project can use to challenge the decision
- An hour once a week is set aside when beneficiaries can come to an organisation's office and raise concerns with a member of staff assigned responsibility for handling complaints
- A phone number that beneficiaries can call anonymously to make complaints regarding the project
- Time is set aside at the end of every community meeting where beneficiaries can voice their concerns and complaints either publicly or privately with local staff
- A village complaints committee composed of local staff and community representatives receives and investigates concerns/complaints from beneficiaries and decides follow-up actions

2.2 Information Sharing

Effective information provision can strengthen trust, build community ownership and encourage participation. People can't be involved in a project or service if they are not adequately informed. Lack of information about a project is an instant block to community participation, ownership and empowerment. Stakeholders have the right to be informed of what organisations do and how they do it in a manner that is accessible to them. Greater transparency and information sharing can serve to strengthen accountability between CAFOD, partners and key stakeholders, including beneficiary communities (see "Transparency and information sharing box" below).

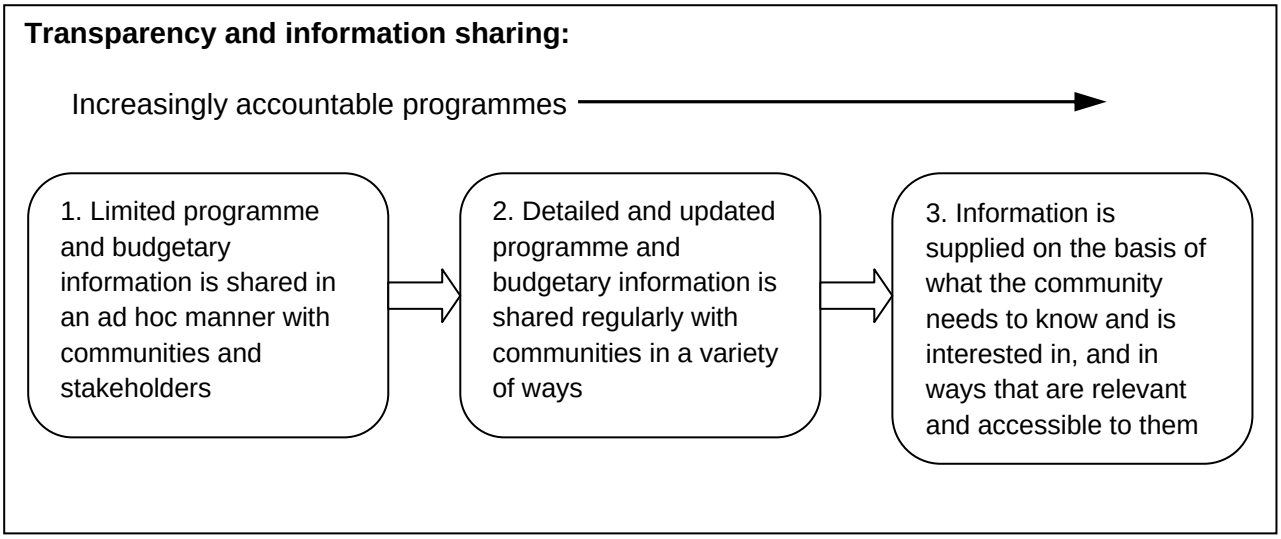
To ensure a CHM is effective, potential users need basic information about the organisation and need to understand their rights and entitlements, within the scope of the programme. It is essential to get a sense across to the communities that they have the RIGHT to complain and that all complaints will be dealt with fairly, efficiently and as simply as possible.

It is essential to make relevant information publicly available to beneficiary communities and other stakeholders. Communication must be clear and in an appropriate format depending on the specific user group. It is also necessary to consult with the user groups to determine how best to communicate essential information - language, media, literacy, location of information etc. Where there is a high level of illiteracy in the community, oral procedures must be put in place. It is important to regularly check that the right information is reaching the right people, and if it isn't, then adapt the methods being used. With the right information being communicated the CHM can work more effectively and for its intended purpose.

Essential information to be provided to stakeholders

- Organisational background and mandate
- Objectives and timeframes of project activities
- Dates and locations of key events open to community participation
- Contact details for responsible person of implementing organisation
- Purpose and procedures for submitting and handling feedback and complaints (CHM)
- Names of donors
- Regular project progress reports and updates
- Basic financial information and financial reports

Transparency and information sharing:

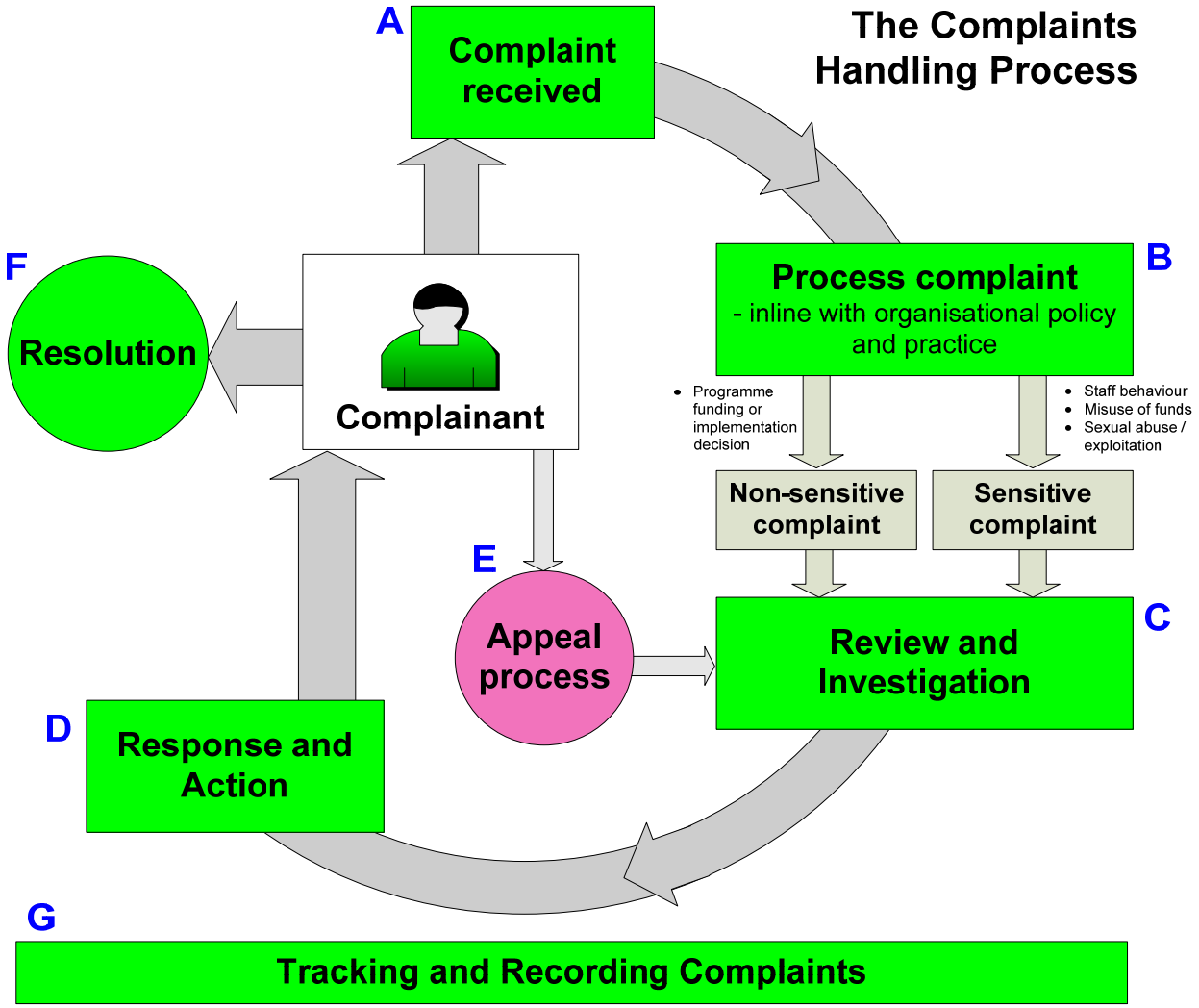


3. Designing and Implementing a CHM

Once sufficient information has been shared about the purpose of the CHM, the different ways in which users prefer to complain understood, and the commitments made by the organisation / project or programme to different stakeholders identified, it is possible to design and implement a CHM.

3.1 Main features of a CHM

The design of any CHM needs to include all the main features shown below. This flow-diagram can be used to map-out how the complaint handling process will work within the structure of an organisation.



3.2 Implementing a CHM

If users meaningfully participate in the design of a CHM, and it is clear to all (staff in the implementing organisation and users) what the CHM is intended for and their own role, then many of the potential practical difficulties in implementation can be eliminated.
The questions below (in the “Key questions” box) can be helpful when thinking through the development of the main features of the CHM which are explained below through points A – G.

Key questions when designing and implementing CHM

- **Information** – How will you go about engaging stakeholders in the process? What information do they need to know about you and your organisation, and what do you need to know from them?
- **Culture** - Is there a 'culture of complaining' or is making complaints taboo? Is there an existing traditional system for complaining locally? Is it formal /informal? What does it handle and how?
- **Context** - Are there any conflicts in the community or further afield that could impact on the mechanism? Are there any political issues or issues with authorities to be aware of?
- **Terminology and language** - Is 'complain' a sensitive word in the local language – do you perhaps need to discuss what it means to them and find ways to that make sense in the local language / culture?
- **Accessibility** - what are the safe ways and formats for different people in the community / other users or stakeholders to submit a complaint (written, oral, formal, informal, etc). What is the literacy rate among men and women? How can marginal or vulnerable groups access the mechanism? What might prevent people from coming forwards to complain?
- **Location** - If a central location is used for complaint submission, where would be best? Where would be most safe and accessible?
- **Trusted system** - Who do people prefer to talk to? Is it acceptable for women to talk to unknown men? Do people feel / trust their leaders? Who can children talk to – who do they trust and what would work best for them?
- **Communication methods** - What communication is available and preferred by users – Written, verbal? Do people prefer to go to a central place to complain or have people come to them?

A. Complaint Received

It should be possible for an organisation to provide several entry points and various formats through which complaints can be submitted e.g. a complaints box; the telephone, letters, via a trusted person, at community meetings etc. For different users there may be different options but key to this is that each option is understood and agreed to by the users and the organisation. If a number of entry points are provided there needs to be a clear procedure within the organisation as to how complaints will be collated, recorded onto a centralised system and managed consistently.

B. Processing a Complaint

The organisation needs to establish what 'type' of complaint it is and therefore which policy or procedure will be used to deal with the complaint. For example CAFOD classifies complaints as *sensitive* or *non-sensitive* (see page 7) in order that complaints are dealt with in-line with the appropriate policy and procedure. Different types of complaint require different approaches in handling them: if sensitive it might be necessary to carry-out a confidential investigation; if non-sensitive the complaint can most likely be resolved more immediately with necessary changes made in-line with programme documentation.

Once it has been decided how the complaint will be handled, the complainant needs to be given acknowledgment that their complaint has been received as soon as possible. They also need to be given an explanation of how the complaint will be dealt with and what they can expect from the process. To manage expectations of people submitting a complaint timeframes for giving a response should be established and clearly communicated to users. For non-sensitive complaints, it would be expected that a response could be given within one working week, whereas for sensitive complaints a longer timeframe would be expected because of more complex investigation processes. So a clear indication of this must be communicated to the complainant. Where possible, responses should be given both verbally and in writing, be recorded by the organisation so that it is possible to check that a response has been given and acted upon.

C. Review and Investigation

Complaints need to be reviewed and investigated to: determine their validity; to clearly identify what commitment or promise has been breached; and to decide what action needs to be taken in

response. The decision on how to investigate a complaint lies with the delegated staff responsible for processing complaints.

For non-sensitive complaints it is typically a programme manager and field / support staff who will review the complaint in line with programme documentation and deal with the complaint directly. For sensitive complaints the investigation will follow appropriate organisational policies and involve a limited number of people to ensure confidentiality e.g. for CAFOD, a complaint concerning financial corruption defers to the Director of Finance and would follow CAFOD's Fraud Policy and Procedures. If the complaint is about something for which CAFOD or its partner does not accept responsibility, it may be referred to an appropriate body or authority or another organisation concerned.

Key considerations for those involved in investigations

- **Competency**: those undertaking investigations should have the ability to take the appropriate action and / or decision and be able to enforce it.
- **Transparency**: for non-sensitive complaints it is important to ensure that the procedure followed is transparent. This includes the composition of the investigating team, and the choice of the decision-makers. Any key decisions that are made must be clearly publicised.
- **Confidentiality**: confidentiality is essential especially when dealing with sensitive complaints. Information must be handled on a strict 'need to know' basis in order to protect both the complainant and the person against whom the complaint is made. The detailed advice in the CAFOD *Complaints Handling Policy* must be followed.
- **Impartiality**: the impartiality of investigators is crucial if the handling of complaints and the response to them are to be fair. If those involved in the handling of any complaint have a vested interest in the outcome of an investigation this will undermine the CHM and can cause further distress or harm to those concerned.

Some serious sensitive complaints may require that investigators are trained to carry out specialist investigations in ways that do no harm and that maintain the integrity of the CHM (e.g. sexual exploitation and abuse cases). Where the complaint relates to a criminal or legal issue, it may be that this cannot be handled internally but needs to be handled by the authorities or go through the local legal processes instead (e.g. fraud and corruption cases which breach local or national laws).

Because some investigations and responses can have far-reaching consequences for CAFOD and/or the partner and/or the complainant, staff should consider what the risks and implications are. Look at how prepared the complainant (and CAFOD/partner) is for the implications of the investigation? What role will the complainant have? Will they be willing to publically say what their concern is? Under what circumstances will CAFOD / partner or complainant want to stop or not go further with an investigation?

Anonymous and malicious complaints or rumours can sometimes give indications to an organisation that there are other issues that people wish to raise but may be reluctant or unable to bring up openly, or that they have concerns about the integrity of the CHM. These can be useful warning signals to an organisation. Refer to Annex 2 for observations on the challenges associated with receiving anonymous, unsubstantiated and malicious complaints.

D. Response and Action

As a result of a review and investigation something needs to be put right, amended or changed in order to improve the situation and resolve the issue. A formal complaint requires a timely response by the organisation. It is vital to clearly communicate any findings of the review and

investigation processes with the complainant and to keep them appropriately informed of what actions will be taken as a result of the decisions taken. Sometimes it might be necessary to communicate what actions will be taken with the wider community if they have also been affected. Responses can be written or verbal as agreed with the complainant and will need to be documented.

This feedback demonstrates that CAFOD and the partner are listening and taking complaints seriously. It shows that the issues have been considered and appropriate action taken. It also demonstrates to users that the CHM works and is safe to use. It can be useful to consider what the complainant is hoping to get as a response: do they want restitution? do they want to draw attention to the issue?

Responses may be negative or the claim found not to be proved. Or they can be positive and a remedy offered, e.g. agreeing that someone previously not on a beneficiary list can now be added. When the response is not accepted, it is necessary to allow the complainant to appeal the decision. Where the issue is outside the control of the organisation, and the complaint is referred to another, the complainant must be made aware that this has happened and told what action was taken.

E. Appeal Process
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, to further demonstrate impartiality and safety to the complainants and to maintain trust in the CHM. Appeals are most likely in more difficult or sensitive cases and allow for more senior staff to re-examine the issue. If too many responses are being appealed this may indicate that there is a problem with either the original CHM process or with the implementation of a project, or perhaps with a staff member. It may then be necessary to look at these factors in more detail.

F. Resolution
An agreement is reached between all parties involved in the complaint and most importantly, the complainant is satisfied that the complaint was dealt with fairly, appropriately and that the action taken offers a solution.

G. Tracking and Recording Complaints
In order to monitor and manage complaints received, a way of tracking and recording key stages of any complaint is necessary. It is important to track how many complaints are received and by whom, from where and from whom, about what, when and how the organisation has responded to the complaint and what measures were taken. Making an analysis of this information collected can be reviewed against programme timescales and key events to indicate trends in performance and can help show what changes need to be considered in the future. Keeping track of the responses can help to feed into the review process (see Section 4) and allow for learning, adjustments to both the CHM and / or to projects, if required.

3.3 Roles and responsibilities

The roles and responsibilities of different people involved in the CHM need to be carefully defined and communicated. Some staff will already have designated roles e.g. HR policies define who the

first point of contact is for an internal staff issue, and these need to be taken into consideration when designing the overall system:

- **Senior management / Head of organisation** – the head of the organisation has ultimate responsibility for the CHM and they may be involved in the Appeals process. If the complaint is against them, then there may be a need to consider external parties (e.g. the Board, or partner organisation) as another authority in which to lodge the complaint. To avoid overloading the head of organisation, their direct operational role should be limited

- **Immediate manager to the complainant** – for complaints concerning staff, the immediate manager will usually be involved in the process but for sensitive issues, it might be necessary to rely on senior management, HR or others

- **Programme / Field staff** – most non-sensitive complaints can be directly managed and handled by staff closest to the situation. If it is about them directly or a sensitive issue, support from more senior or specifically designated staff may be required. It is important to consider that people, especially community members, may not be comfortable complaining directly to staff they work with every day and it might be more suitable to them to complain to someone more removed or senior within the programme / organisation.

- **Beneficiary representative(s)** – having a beneficiary or stakeholder representative involved in the complaints process can be a positive and transparent addition, but it is important to that everyone involved understands the authority and knowledge they hold (who do they represent?) within a community and how this will contribute to the process and solution

- **Donor or other partner NGO** – an external and relatively unbiased stakeholder can add value in terms of legitimacy and options for possible responses and action i.e. reallocation of funds or support for the investigation.

4. Monitoring, Reviewing and Learning from Complaints

4.1 Monitoring and reviewing the CHM system

In order to determine if a CHM is functioning as intended it is essential to build in a monitoring and review process of the CHM itself. Monitoring should be used to track and reflect on the complaints, the access points, the formats used, the investigation processes and the responses given; this constitutes a check on how these different aspects of the mechanism are working, and in particular on whether users (check *which* people) understand their rights, are able to use and understand the system, and may also suggest ways to improve it. In addition, a full review of the system should be carried out periodically to examine the system for any bottlenecks in processing or responding to the complainant.

The CHM processes and steps can then be re-visited, approaches adapted and the system can evolve to ensure it is serving its purpose. See Annex 4 for "Characteristics of Complaint Handling" to assist with monitoring and reviewing CHM systems.

When reviewing a CHM, check how the following principles are working in practice:

- **Participation** - Check how people (users) are or were involved in designing, implementing and monitoring the system. In particular, check that it is reaching out to the programme / project target groups and is not discriminatory or is missing out people that you are trying to reach, work with or protect.

- **Contextual and appropriate** - Check that the CHM fits and reflects the specific situation of the programme, the context of the country, region, location and the culture where activities are being implemented. Make sure that the CHM fits within the way that programme activities are implemented or delivered.

- **User-friendly and accessible information** - Monitor that information is disseminated in a user- friendly way and is accessible by all user groups. Check to see if user groups know who the implementing organisation is, if they know what the programme involves and who it is intended for, do they know how the CHM process works and how they can access it? Is the information in the right format for the intended user group, e.g. if the programme is for children or for more illiterate people then perhaps information represented in pictures or diagrams. Is the language correct and easily understood?

- **Transparency** - Ensure that the purpose of the CHM, its limitations and how the system works is made clear. If, for instance, many complaints are being received that are not relevant to the programme/project, this may indicate that there is a problem with the basic information being provided. It may be necessary to review how information is being communicated and adjust the approach / methods use in order to make clear to users what they can expect.

- **Accessible and safe procedures** - It is vital that users feel they can access the system safely and they will not be put at risk if they use the system or suffer because they complain. This applies to staff as well as the communities or other stakeholders.

- **Respectful and dignifying** - Check with users how they perceive the system, whether they feel they are asking for 'favours' or acting within their rights.

- **Independence, confidentiality and non-retaliation** (where appropriate) - Consulting the users on how they perceive these elements, and reviewing confidentiality processes and checking with users that they don't feel threatened or unwilling to use the system is essential.

- **Empowering** - If an organisation can demonstrate that it takes complaints and feedback seriously, that they listen to what they are being told and this is reflected in the way they work, it is likely to reinforce a sense of confidence in the organisation by the users and other stakeholders. People are more likely to continue to use a CHM when they can see that if they speak out about the things that concern them they can have a direct impact on the situation.

- **Appropriate capabilities, values, attitudes and behaviours** - Check how staff perceive the CHM. Do they value it and demonstrate this in the way they behave or work with the community? Staff may see it as a check on them and so may not trust the system and may not be keen to set it up or promote it within their communities. Senior management need to also demonstrate they value the system and the learning from it.

4.2 Learning from Complaints

Reviewing the CHM assists the organisation to identify issues arising from the complaints themselves and can provide insights into how well a programme / project is meeting its stated objectives and how well CAFOD and that partner are implementing activities. Information gathered from the types, nature and number of complaints can be used positively to adapt and evolve in order to strengthen the quality of programme work.

It can also serve as an early warning of a problem with programme implementation or of an issue with particular staff members. For example, the recurrence of the issues may indicate a structural flaw in the programme/project. Information from complaints feed into organisational learning processes and influence future programme planning, design and implementation.

ANNEXES

Annex 1: HAP Principles of Accountability

As a partnership-based organisation CAFOD has committed to improving our accountability to our partners and to encourage and supporting partners that we work in solidarity with to strengthening their accountability practices.

The seven HAP Accountability Principles that CAFOD are committed to:

1) **Commitment to humanitarian standards and rights**
   Organisations commit to respect and foster humanitarian standards and the rights of beneficiaries

2) **Setting standards and building capacity**
   Organisations set a framework of accountability to their stakeholders (footnote). Organisations set and periodically review their standards and performance indicators, and revise them if necessary. They provide appropriate training in the use and implementation of standards.

3) **Communication**
   Organisations inform, and consult with, stakeholders, particularly beneficiaries and staff, about the standards adopted, programmes to be undertaken and mechanisms available for addressing concerns.

4) **Participation in programmes**
   Organisations involve beneficiaries in the planning, implementation, monitoring and evaluation of programmes and report to them on progress, subject only to serious operational constraints.

5) **Monitoring and reporting on compliance**
   Organisations involve beneficiaries and staff when they monitor and revise standards. They regularly monitor and evaluate compliance with standards, using robust processes. Organisations report at least annually to stakeholders, including beneficiaries, on compliance with standards. Reporting may take a variety of forms.

6) **Addressing complaints**
   Organisations enable beneficiaries and staff to report complaints and seek redress safely.

7) **Implementing partners**
   Organisations are committed to the implementation of these principles if and when working through implementing partners.

Footnote: Framework of accountability includes standards, quality standards, principles, policies, guidelines, training and other capacity-building work, etc. The framework must include measurable performance indicators. Standards may be internal to the organisation or they may be collective, e.g. Sphere or People in Aid.

See CAFOD's Accountability Framework on CAFOD CONNECT Accountability COW

Annex 2: Benefits and Challenges

Potential benefits of implementing CHM within programme activities:

- It alerts agencies to problems with staff or with their programme implementation
- Allows agencies to rectify minor and unintended mistakes; to manage risk before it gets too big
- Protects staff by providing them with a way to investigate issues and respond to them
- Continuous learning and improvement for both the CHM and the organisation/project
- Effective response enhances public standing as it demonstrates the organisation is listening
- It allows for better use of resources as you can check if people are satisfied with how the organisation is responding to them.
- Provides valuable management information – on how the project/ programme, staff and organisation are working.

Challenges and issues of CHM in practice:

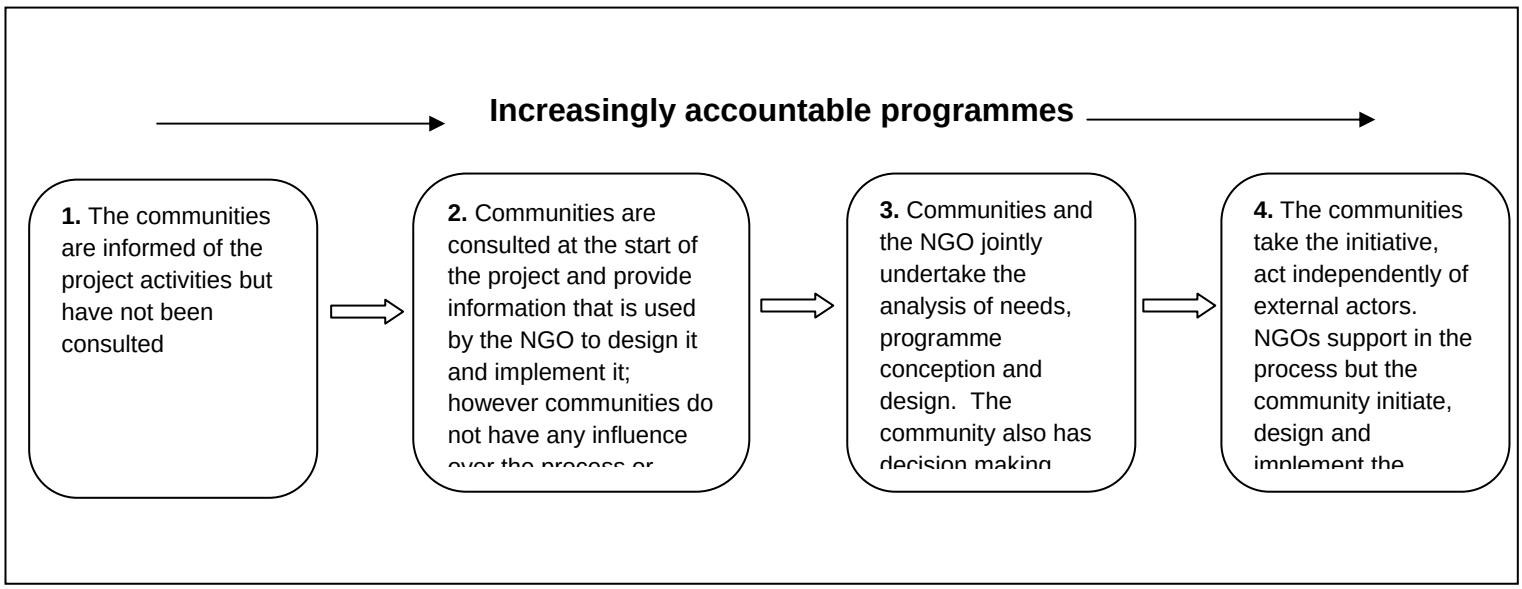
- Complaints, culture and history: how to trust the system? - complaints are seen as different in different cultures - exploring how they do this – what are the traditional or acceptable methods for raising issues and tapping in to this to gain the trust of the stakeholders.
- Coverage - communicating to busy people in various situations to make sure all members of a community are aware of their right to complain and the process.
- Clarity on what can be complained about – it is important people understand that there are limits on what can be complained about so as to manage expectations and ensure that the system is effective for both the stakeholders and the organisation.
- Language and literacy – translation into the 'national' language is often not enough as many need to have it their local language or in pictorial formats, for illiterate community members.
- Power imbalances within communities – whose voices counts? – In communities and agencies, power is often not shared equally. Community committees, which are set up to represent a community do not always do so in the fairest ways. There are also tensions between communities and staff.
- Involving communities – setting up 'blueprint' systems will often not be appropriate. Involving members of the communities in setting up a system is likely to ensure a better system. The process of involving the community from the outset that develops a more trusting relationship.
- Attitudes – it helps that staff with good attitudes towards communities helps with the effectiveness of the CRM as they help build good relationships.
- Gender balance in staff – many female community members often feel more comfortable discussing complaints with female members of staff, especially if these are over sensitive issues so it is important to consider the gender balance of your staff group.
- Skills and training- staff need to confident in their abilities to implement and manage the system. Training needs to be geared to their style of learning.
- Senior management commitment – is vital to ensure an effective CHM.

Challenges: anonymous, unsubstantiated and malicious complaints

- Some allegations may not satisfy the formal requirements of ‘complaints’ as they lack crucial information. However, failing to act when there is a suspicion of breach of policy or abuse may be a violation of an organisation’s duty of care. In such circumstances an initial investigation may be required to trace an allegation back to its source. There may be a victim or witness to talk to about the possibility of bringing a complaint or blowing the whistle.
- It may be possible to investigate anonymous complaints, where the victim/complainant is not known, if there is sufficient background information and/or good leads to witnesses who can give strong testimony about the alleged abuse. It is important to treat anonymous complaints seriously because of the potential for future abuse and harm, and our responsibility to create a safe and abuse-free environment. A more difficult issue is how to deal with rumours, such as allegations that are common knowledge but have not been submitted as formal complaints.
- In some cases, potentially malicious (nasty or untrue) or unsubstantiated complaints may be made by people who feel angry or upset by something an organisation – or people the organisation is involved with – has done or not done. Again, these types of complaints can be very damaging if they are not dealt with and managed carefully. They must be investigated sensitively and a response given or it is likely that the complainant will continue to undermine the work of the organisation.
- Anonymous and malicious complaints or rumours can sometimes give indications to an organisation that there are other issues that people wish to raise but may be reluctant or unable to bring up openly, or that they have concerns about the integrity of the CHM. These can be useful warning signals to an organisation.

Annex 3: Participation

As far as possible decisions at a programme or project level should be made jointly with the beneficiaries and key stakeholders as appropriate. This helps to generate ownership of the activities and builds trust between the implementing organisation and beneficiary communities. A high level participatory approach can empower beneficiaries to coordinate projects themselves, with the organisation playing a supporting role.



Key monitoring points of participation in the programme cycle:

1. The organisation has involved community members in processes used to develop selection criteria, identification and final selection of beneficiaries
2. The community have been given opportunities to influence design of the project, implementation, monitoring and evaluation mechanisms
3. The majority of beneficiaries know what opportunities there exist to participate and feedback on the project
4. Vulnerable and marginalised groups have been given opportunities to participate in the project
5. The community feel a sense of ownership and responsibility over the project

Annex 4: Characteristics of complaints handling

Increasingly accountable programmes

	1	2	3	4
Characteristics	No formal system; Informal complaints dealt with on an ad hoc basis and are not well recognised within the organisation	Communities are informed as to their right to give feedback on a programme, including complaints, and are offered at least one way of providing such feedback though this may be informal	Basic formal mechanism in place though with minimum community consultation; feedback is encouraged	Formal mechanism for complaints and feedback operational and is effective, accessible and safe and designed with full consultation with the communities
Practices	• Informal handling of complaints • No staff guidance/training on how to handle complaints • Many complaints not dealt with to conclusion	• Verbal complaints to project staff • Some guidance and support to staff • Feedback through community committees	• Formal policy in place • Training for staff • Awareness of the need for confidentiality • Communication plan for community • Complaints mechanism accessible to majority of the community • Variety of feedback mechanisms	• The organisation has an established and documented complaints handling procedure • Implementation plan for staff and beneficiaries
What you might see	• No records of complaints	• Community making complaints informally • Project design changed as a result of informal feedback • Some written evidence of discussion of community feedback/ complaints (minutes of team meetings)	• Policy includes the right to complain; how to complain; what happens as a result • Staff guidelines • Evidence of complaints records and feedback to the community • Good community information • Community feedback meetings	• Full CRM in place and functioning • Implementation plan and progress reports against it • Documented complaints records; written responses • Evidence of reflection on the analysis of received complaints and subsequent changes to ways of working • Training records
What you might find	• Frustrated local community • Community have little/no awareness of how to raise a complaint or give feedback • Community don't feel engaged in the project	• More than 50% of community know who to speak to if they have an issue • People unsure of what will happen as a result of raising a complaint • Staff feel they handle complaints as part of their daily job	• Greater engagement of community • Most people know that they can complain and feel confident in the system • Most people know the process of how to complain and what will happen to their complaint	• Beneficiaries, communities and staff are aware of the procedures and have confident in its integrity and effectiveness

Annex 5: Useful Tools

- **Danish Refugee Council's Handbook on Complaints Mechanisms**

http://www.drc.dk/relief-work/humanitarian-accountability-framework/complaints-mechanism-handbook

This handbook is a very comprehensive guide to CRMs. It contains a very detailed step by step guide (Chapter 3; p.41) leading the practitioner through a process of generating support for the CRM to setting it up. Useful tools to use in discussion and analysis to guide the development of a CRM system are available.

- **World Vision's Community Complaints Cards**

http://www.hapinternational.org/pool/files/wv-sri-lanka-community-complaints-handling-cards.pdf

This exercise is simple way to involve the community in establishing what they would like community complaints mechanism to look like. The cards provide a means of prompting discussion about different aspects of a complaints mechanism such as the need for a mechanism, access of the mechanism to different groups within the community and the processing and handling of complaints by an agency.

- **The Guide to the HAP Standard, Tool 26: Points to remember when implementing a complaints handling mechanism (Annex 3; p217)**

http://www.hapinternational.org/pool/files/hap-annex-3.pdf

This 2 page table has some key points to keep in mind when implementing a CRM.

- **The Good Enough Guide**

http://www.ecbproject.org/pool/good-enough-guide.pdf

What difference are we making? How do we know? The Good Enough Guide helps busy field workers to address these questions. It offers a set of basic guidelines on how to be accountable to local people and measure programme impact in emergency situations.
Its 'good enough' approach emphasises simple and practical solutions and encourages the user to choose tools that are safe, quick, and easy to implement.

Annex 6: Case Studies

A complaints and response mechanism in action

Medair responded to the Kashmir earthquake in October 2005 with emergency shelter and non-food items. The team soon realised that it needed a mechanism to address constant queries and complaints. One hour a day was dedicated to dealing with complaints at the main project base. This was the only time that Medair would receive complaints. A complainant could speak to the administrator or office manager. If possible, complaints were resolved informally. Otherwise, office staff completed a complaints form and passed this to an assessment team in the field. Complaints about staff members were investigated by the project manager at each base.

Most complaints came from earthquake survivors who had not received a shelter. They also came from people outside Medair's own project area. In those cases, Medair lobbied the responsible agency. Sometimes, if nothing happened, Medair provided help itself. If a complaint investigated by an assessment team was upheld, the beneficiary received assistance, depending on Medair's resources.

A spreadsheet recorded the numbers of complaints from each village, and how many complaints had been dealt with. This enabled project staff to assess progress and to integrate complaints into project planning. By the end of the emergency phase, Medair had dealt with approximately 1,600 complaints, 70% of all those it had received. Not all complaints could be investigated because by March 2006 Medair had used up its project funds. Checking more households would raise false expectations. Also, 5 months after the earthquake, most homes had been rehabilitated. Of the complaints investigated, 18% were upheld. Complaints about staff led to dismissal for 3 individuals who had given preferential treatment to their tribal or family members.

The complaints mechanism saved Medair teams significant time in both field and office and in identifying gaps in coverage. By using this mechanism, Medair helped 290 families whose needs would otherwise have been overlooked. Medair was new to Pakistan and the complaints and response mechanism helped to compensate for limited local knowledge. By the end of the project, communities would contact Medair about any discrepancy they saw in its distributions, confident that the agency would take appropriate action.

From: written communication with Robert Schofield and John Primrose, Medair (adapted). ***(ECB Tool 12)***

Tearfund - Beneficiary reference groups

Tearfund ran emergency programmes in Northern Kenya for pastoralists affected by drought. The programmes stressed the importance of community participation. But they were challenged by villagers' reluctance to speak publicly, and by conflicts of interest among local committee members involved in identifying beneficiaries.

Tearfund established Beneficiary Reference Groups (BRGs) in ten communities. They were composed of respected youth, women, elders and church volunteers who were not part of any Tearfund committee. They acted as their community's 'eyes', receiving local questions, feedback and concerns, and working with staff from Tearfund and other NGOs to address issues swiftly. Tearfund discovered that the BRGs played a pivotal role in enhancing participation and transparency during the emergency programme. Because the BRGs did not control resources, they could help ensure that beneficiaries were identified fairly, and also support conflict resolution.They allowed Tearfund to hear the views of the more vulnerable groups, as well as overall community feedback on how Tearfund was perceived.

Source: http://www.hapinternational.org/pool/files/tearfund-north-kenya-programme-ncreasinglevels-of-participation.pdf

Christian Community Services Mount Kenya East (CCSMKE); 2009

A Station Development Committee (SDC) is a group of community stakeholders made up of the religious committee, community members, relevant government line ministries and other development actors, selected to represent the community. In the past CCSMKE had engaged with SDCs for consultation and planning, but had not explicitly identified their role in project implementation. There was a need for systematic community involvement throughout the project cycle and as part of their action plan, the use of existing community structures were reviewed by CCSMKE staff to ensure direct beneficiaries had a voice. In 2008-9, in response to the drought in Northern Kenya, an emergency program was initiated by CCSMKE in Sololo. The inclusion of a community accountability process through the SDC was a central part to the project design stage. Isaiah Oba, CCSMKE project coordinator observed that *'downward accountability has made our work easier.* ***Community members and SDCs are now the custodians of the projects. Because they know the budgets, they monitor the whole process from tendering to implementation and evaluation to ensure value for money'.***

Organisational changes

These small steps have led to much wider organisational changes through a process of piloting and reflection. The benefits of better downward accountability have been so strong and visible that it has triggered a change in the organisation's process of project management. This includes the following:

Planning
The Board of Directors make a decision to engage communities at project inception, which is communicated to the relevant SDC. The SDC invites stakeholders to discuss the proposals and to participate in a needs assessment where communities are able to identify their problems, resources and possible solutions. Programme technical staff facilitate the prioritisation of the problems and plans by the community to design their intervention strategy. CCSMKE management forward this for presentation to the Board and partners.

Monitoring
Monitoring is carried out by the SDC every quarter and as well as when issues arise through site visits and review of narrative and financial reports. CCSMKE's Central Coordinating Office and the specially constituted monitoring committee of the CCSMKE Board also regularly monitors the progress of the project through periodic visits to the stations and projects sites, reports, updates, interactions and internal audit.

Evaluation
The Mid-term and end-term evaluations process involves partners, government, church and community representatives who visit project sites and interact with beneficiaries. During the process the community is duly informed of the visits and allowed to air their concerns with the evaluation team. Observations of the team are shared with the SDC and technical staff and later with the Board, partners and the communities.

Source: Christian Aid

Annex 7: Investigations

CAFOD has a set of guidelines for use when investigating allegations against a member of staff. The guidelines may be useful for other investigations, but their primary purpose if for investigating allegations made against CAFOD staff members.

In CAFOD the principles of investigations are:

- Impartiality
- Swiftness
- Dignity
- Separation of investigation and disciplinary decision making

In CAFOD, investigations are undertaken to establish the facts of an allegation. Allegations could stem from a number of things, such as a complaint from a partner or beneficiary about a CAFOD staff member, a complaint from a supporter in England and Wales about a CAFOD staff member, an allegation of misconduct or a grievance against a staff member by either another member of staff or an external party. Investigations can only be initiated in line with the relevant policy, depending on the issue e.g. for a complaint by a beneficiary the relevant policy is the Complaints Handling Mechanism, for an allegation against a staff member the relevant policy will be either the grievance or disciplinary policy.

In all cases investigations will be as a result of the actions set out by the relevant policy. If conducting an investigation under the disciplinary or grievance policy the relevant HR Adviser must be involved from the outset.

The purpose of any investigation is to establish whether there is evidence to support an allegation that has been made against a member/s of staff. This is done through gathering all the relevant facts by checking appropriate records, collecting relevant documents and, if appropriate, taking statements from any witnesses or anyone else who may have a bearing on, or pertinent knowledge about, the matter.

Investigations are conducted by an investigator or investigations team who report to an investigation manager. The investigation manager commissions the investigation and is usually the disciplinary decision maker.

Following an investigation, the investigation report is submitted to the disciplinary decision maker for a decision on what action is to be taken if any.

CAFOD has a small number of experienced investigators for particular types of investigation. Refer to Human Resources in the first instance when looking for an investigator.

The investigation guidelines can be found in CAFOD People on the Ask HR page of connect.