Guidance Note and Protocol on Publishing Complaints Metrics

July 2015

Guidance Note

Why report?

As a sector, we are committed to accountability and transparency. When an organisation publishes data about the complaints they have received, they firmly demonstrate this commitment. It helps to engender a relationship of trust with our donors, the public who support us and most importantly, the communities we seek to assist. Many of our organisations campaign for transparency from their governments or other institutions – we need to demonstrate that we are willing to lead the way.

Publishing complaints data also benefits the sector, allowing us to analyse the information in order to determine how best to prevent our presence from being harmful. We can use this both internally within our organisations to feed into our prevention strategies, and externally to track trends. For this reason, it is useful to create a standardised way to report data, so that results can be aggregated and compared – and used to identify how we can best work on prevention as sector. This will also help build a body of evidence on key issues such as sexual exploitation and abuse, to demonstrate to the sector that this needs addressing.

Finally, by publicly demonstrating that we take action on complaints, we help create an environment where people feel more confident in coming forward and reporting.

Many NGOs, northern and southern, large and small already report their complaints data[1]. To date there has been no negative response to these publications; in fact, agencies report that the experience has been a positive one.

What to report

For the purpose of this document, a complaint is defined as:

'An expression of dissatisfaction about the standards of service, actions or lack of action by the organisation or its staff, volunteers or anybody directly involved in the delivery of its work. It is a criticism that expects a reply and would like things to be changed. Complaints could include the following (which is not an exhaustive list):

- Concern from someone we work with about the quality of programme delivery
- Concern from a member of the public or supporter about a particular fundraising approach, campaign or statement made by the organisation
- Concern about fraud, corruption or misuse of funds
- Concern about the behaviour or staff, volunteers or contractors

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[1] For more information, contact the CHS Alliance at info@chsalliance.org

A complaint has to be about an action for which the organisation is responsible or which is within our sphere of influence'.

Many organisations' mechanisms are designed to capture both feedback and complaints. The difference between the two is defined as follows:

Feedback: Issues usually concerning programme delivery or design that can be resolved over a few days, by staff on site. (Some issues raised by feedback may actually constitute a complaint – see below).

Complaints: Concerns relating to serious fraud, misconduct or negligence, including child protection and sexual exploitation or abuse, that need to be referred to senior management for action.

Feedback data is very useful, and should be monitored and analysed to improve programme design and implementation. However this protocol is specifically concerned with capturing data on complaints and allegations made about the organisation.

Not all allegations come to us directly as complaints. Sometimes an issue is identified through rumour, or someone raising a concern, or someone may provide feedback that is worrying in nature. If the rumour, concern or worrying feedback results in further action (as outlined in 'Complaints' above), then it should be included in the organisation's report.

Some of the complaints and allegations that fit into this category will constitute criminal activity, and some will be non-criminal, but all will represent a serious breach of organisational policy. Both types should be included in the report. If the allegation is referred for criminal investigation, this should be indicated in the 'Actions Taken' column (see below).

It is strongly recommended that you include a narrative to accompany the data you report. This can help explain the figures to your audience. It should include definitions of the allegations reported, but also provide an analysis of any particular trends, and perhaps a commentary explaining that the figures are likely to be under-reported. It is also important to include information on the prevention activities your organisation is implementing.

Where you can report

There are several options regarding where to report your complaints data. The important factor is that the information is easily accessible to the public. Common places to report include your organisation's annual report, the Global Reporting Initiative Accountability Report[2] (if your organisation submits one), or on your website. You could use more than one option to report.

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[2] https://www.globalreporting.org

CHS Alliance members are also encouraged to submit this data as part of their annual progress report. The most important thing is that the data is available in the public domain. Members are also encouraged to share this information with the communities they work with, through accessible means.

How to use the classifications in this Protocol

Please choose one of the following categorisations below for each section of the report where relevant. The categorisations provided here are standardised, in order to better track global trends. If you cannot find a relevant category on this page when completing your report, please use 'other' and provide more detail if necessary.

Type of allegation

Fraud and Corruption
- Allegations of financial abuse concerning (but not limited to) fraud, theft, bribery, nepotism or other misuse of funds or resources.

Fundraising and campaigning
- Concerns raised by member(s) of the public regarding fundraising and communications approaches – for example intrusive fundraising, inappropriate messaging in campaigns, statements considered to be political in nature, etc.

Safeguarding: children[3]
- Allegations against a staff member or other representative of the organisation concerning conduct towards children that is either inappropriate[4] or abusive (physical, emotional, sexual abuse), exploitative, or neglectful in nature[5].
- Allegations of child abuse or sexual exploitation by a community member involved in the implementation of the organisation's activities (e.g. community leader).
- Allegations or concerns that a child has been harmed as a direct or indirect result of the design and delivery of the organisation's operational activities.
- Harm by others which is the direct result of an organisation's operational activities e.g. sponsorship, use of images and stories.

Safeguarding: adult
- As above for vulnerable adults.

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[3] In accordance with the UN Convention on the Rights of the Child, a child is considered to be anyone under the age of 18

[4] For example if a staff member is seen spending too much time alone with a child beneficiary, or socialising with child beneficiaries outside of work, that in itself is inappropriate behaviour which must be reported and acted on, irrespective of any allegation or suspicion of sexual activity. Most Child Safeguarding Policies contain a large range of reportable inappropriate conduct.

Actual or potential risk or neglect in programming
- Harm caused to individual(s) as a result of programme design or delivery.
- Concerns brought to the attention of, and addressed by the organisation which had the potential to put beneficiaries at risk of abuse, injury or other harm due to the design and delivery of the programme itself (e.g. unsafe construction site, expired medicines being distributed to beneficiaries, etc.). NB If these concerns present safeguarding risks, they should be included in the Safeguarding category.

Bullying and Harassment
- Allegations relating to staff bullying or harassing other staff. Bullying and harassment (including sexual harassment) refers to any unwanted behaviour that makes someone feel intimidated, degraded, humiliated or offended.

Other
- Allegations of staff conduct that are in breach of organisational policy, not covered by Safeguarding.
- Other complaints not covered by the categories above.

Category of Personnel

This refers to the individuals(s) against whom the complaint is made. If the complaint is against the organisation (for example in programme risk, or fundraising and advocacy) please indicate.

Staff member	Consultant
Volunteer/incentive worker	Contractor/supplier
Visitor to programme (e.g. media, donor, child sponsor – please specify)	Partner staff
	Other associated personnel

Region

This column is for suggested use by your organisation, and will not be shared publicly. This information may be useful for you to track and analyse trends in complaints in your programme

Results

Pending / ongoing investigation	Upheld	Not upheld due to insufficient evidence	Not upheld by proof of evidence

Actions taken

Criminal referral	Disciplinary action
No action taken	Preventative measures (provide examples)
Re-design of programme intervention (provide examples)	Other

Reporting Protocols

Summary

Type of allegation	Number reported	Number upheld
Fraud & corruption		
Fundraising & campaigning		
Safeguarding – child		
Safeguarding – adult		
Risk or neglect in programming		
Bullying and harassment		
Other		

Complete report

Type of allegation	Category of personnel	Region (for agency use only)	Results	Actions taken

NB If you are only using this reporting form to report certain categories of allegations (e.g. Safeguarding), simply write 'not applicable' in the other categories.