

Minimum Standards on Complaints & Feedback for the Lebanon Crisis Response Plan

People have the right to complain and provide feedback to a service provider and to receive an appropriate and timely response. Formal mechanisms for complaints and redress are an essential marker of quality service provision, giving people an element of control and inclusion over their lives. It is important for organizations operating in Lebanon to make an active commitment to using power responsibly **by taking account of, giving account to and being held to account by** crisis-affected children, young people and communities they work with.

This checklist aims to support organizations to assess whether they meet the minimum standards for having complaints and feedback mechanisms in place. Protection Mainstreaming and Accountability for Affected Populations (AAP) are Inter-Agency priorities for the Lebanon Crisis Response Plan 2020.

What is a complaints, feedback & response mechanism?

<https://interagencystandingcommittee.org/accountability-affected-populations-including-protection-sexual-exploitation-and-abuse/documents-50>

A complaints, feedback and response mechanism (CFRM)* is a set of clear, transparent procedures that provides people in communities with access to a safe, confidential means of voicing complaints or providing feedback on their experiences with the services they use. The main objective is to increase the influence of communities over services, ensure that incidence of service dissatisfaction or misconduct are addressed, and to enhance overall programme quality and ensure sustainability of the system.

* also often referred to as a community-based complaints mechanism (CBCM)
https://interagencystandingcommittee.org/system/files/best_practice_guide_inter_agency_community_based_complaint_mechanisms_1.pdf

Steps to set-up a complaints & feedback mechanism

Plan

- 1** Secure organizational commitment to set-up a complaints, feedback and response system suitable for the targetted population group
- 2** Consult communities and individuals from different groups (men, women, girls and boys, older people, persons with disabilities, etc.) on their needs, preferences, and accessibility (specially during remote interventions, this factors Internet accessibility)
- 3** Define purpose, scope and set expectations

Consultation with communities: Communities should be consulted at the design phase to ensure the system is accessible, safe and dignified and avoids causing harm. It is essential to make provisions for the most vulnerable to advance their access to entry points and receive feedback, this means consulting with persons with disability, the elderly, female headed-households, women and children at risk among others. The community should then be consulted on a yearly basis to assess and evaluate the CFRM.

Manage expectations: This is important, as communities may believe that the complaints and feedback process can solve all of their problems. Also establish which complaints can be responded to individually and which will not, but will rather inform programmes and interventions.

Design

- 4** Identify which communication channels are most appropriate
- 5** Consider how sensitive information such as PSEA will be collected and addressed
- 6** Assign roles, set up infrastructure and staff should be trained on communication with affected/vulnerable people, should be trained on how to use the system and also be familiar with service mapping - to ensure they give beneficiaries needed info if asked
- 7** Raise community awareness on expected use, purpose of the system and how to make a complaint
- 8** Staff assigned to handle complaints should be independent of implementing teams, and any other function within the organization that is in contact with the beneficiaries and supplies. The only exception being the M&E team and would depend on who the function reports to.

Communication Channels:

Carefully consider, in consultation with the community, the pros and cons of each communication channel before selection - information/hotline, complaints box, email, facebook, whatsapp, in person. A link to an overview of various channels should be accessible for all groups.

Sensitive information:

Sensitive information (relating to corruption, sexual exploitation and abuse, or gross misconduct or malpractice) and non-sensitive information (e.g. challenges to use of selection criteria) is likely to be collected. Sensitive information received requires an urgent response to a specialized service provider. Staff receiving complaints & feedback should be trained on how to respond to sensitive information and safe referral and identification protocols. It is encouraged to have a mix of staff genders and backgrounds to facilitate response to communities in a safe, timely, and confidential manner

Data collection, analysis, sharing

- 9** Plan how to receive, log and validate a complaint or feedback while respecting confidentiality, and "do no harm" principles
- 10** Plan to collect information that staff actually need in order to make decisions and adapt programs (ex. produce a report, recommendations)
- 11** Ensure solicited and unsolicited feedback is captured and analyzed
- 12** Plan who will conduct data analysis and who will receive it
- 13** Report feedback trends and analysis to decision-makers
- 14** Data protection principles & standards should be embedded and applied throughout all stages of CRFM. It's essential to maintaining confidentiality of the complainant even within an organization to avoid retribution/retaliation and negative repercussion towards the complainant, by staff, partners and suppliers.

Status of complaints & feedback:

Complaints & feedback should be tagged as open or closed, and the date of closure of a complaint or feedback should be recorded. Staff should be trained on how to log complaints and feedback, to ensure consistent categorization and logging between staff.

Handling complaints & feedback:

After a complaint or feedback is received and recorded, complaints should be assigned to appropriate internal focal points for investigation and follow up. Only staff trained to conduct follow up and investigate should do so, if not possible national reporting systems* should be used. If the complaint or feedback does not relate to your agency's programme, it should be referred with consent to the relevant actor for action.

Providing feedback or a response

- 15 Establish methods to resolve a complaint or response to feedback (referral, informally, formally or by investigation)
- 16 Ensure there is an active and clear appeals process in place, and that the community is informed
- 17 Where possible the organization should assess the level of satisfaction of the response & action before closing a case.

Data disaggregation: All data should be disaggregated by age, gender, disability and nationality.

Suggested information to collect: date of complaint, gender, age, disability of complainant, e-card number, main and sub category type of complaint, description of problem, contact details of complainant, consent to process information, priority grading, and focal point for follow up, reference number.

This guidance has been drawn from the Core Humanitarian Standards Guidance, IASC Inter-Agency Community-Based Complaints Mechanism Guidelines, IRC Complaints & Feedback Guidance, and, ALNAP practitioners guide on Effective Feedback in Humanitarian Contexts

Does your organization meet these minimum standards for complaints & feedback?

Framework

The organisation has a formalized complaint & feedback management system in place.

<p>1 The Director/Executive ensures a written complaint & feedback management policy is produced, reviewed by a technical specialist, and members of the board (where relevant) and is approved in line with global standards.</p>	<p>Yes/No</p>
<p>2 The Director ensures that safe, accessible and confidential procedures are in place within the policy for sensitive information (fraud, sexual exploitation and abuse)</p>	<p>Yes/No</p>
<p>3 Resources needed to set up, operate and maintain the system are budgeted for, or included into future proposals.</p>	<p>Yes/No</p>
<p>4 Complaint-handling roles are assigned and communicated to the program staff.</p>	<p>Yes/No</p>
<p>5 The complaint & feedback management policy is formally reviewed based on the feedback from affected communities and an assessment on how it is working in a set period of implementation.</p>	<p>Yes/No</p>

The safety of the complainant and those affected is prioritized at all stages. (CHS)

<https://www.chsalliance.org/>

<p>6 All staff members are oriented to organizational and Inter-Agency mandatory reporting requirements. (link here)</p>	<p>Yes/No</p>
<p>7 Staff understand how to redirect allegations of code of conduct violations and these are redirected to the designated authority within 24 hours.</p>	<p>Yes/No</p>
<p>8 Only trained and committed staff should respond to allegations of sexual exploitation and abuse (PSEA), noting that there is a need to limit the number "of specifically appointed" staff with whom sensitive information is shared.</p>	<p>Yes/No</p>

 Core standards

Complaint Handling

Complaints & feedback are welcomed and accepted, and it is communicated how the mechanism can be accessed and the scope of issues it can address. (CHS)

9 All staff are trained on the principles of accountability and the organization's complaint & feedback mechanism.	Yes/No
10 All staff members should receive the complaint & feedback management policy, including any updated versions.	Yes/No
11 Information on right to complain and provide feedback, how and where is regularly provided to stakeholders and communities. This can be through information sessions, during program activities, posters, leaflets.	Yes/No
12 Information on your organizations standards for professional conduct is provided to stakeholders.	Yes/No
13 Information is made available in context -appropriate languages, formats and media to ensure it is accessible for women, men, children, persons with disability, and illiterate persons	Yes/No
14 Entry points for providing a complaint or feedback are designed in participation with women, men, children and persons with disability to ensure accessibility for all and preserve confidentiality.	Yes/No
15 Community expectations are managed through clear communication on the type of information accepted (sensitive and/or non-sensitive)	Yes/No

Complaints are managed in a timely, fair and appropriate manner. (CHS)

16 Designated focal points who proven integrity, objectivity, ability to maintain confidentiality and fluency in communicating with different communities for complaint & feedback handling are in operation.	Yes/No
17 Stakeholders are consulted prior to the design of the CFRM; and at least two access point channels are selected and designed to allow meaningful and confidential access as a result of the consultation.	Yes/No
18 Staff members are trained on how to assist people to report a complaint or problem, or to provide feedback.	Yes/No
19 Standard time-frames and deadlines are specified for both the acknowledgment and closure of the complaint.	Yes/No
20 Monthly reports are generated on the number of complaints/feedback received with the analysis of the typologies cases were received on and the time-frames in which cases were dealt with.	Yes/No

Complaints & feedback that do not fall within the scope of the organization are referred to a relevant party in a manner consistent with referral minimum standards. (CHS)

21	Information on other services and service providers is available and program staff receive up to date mappings of services and complaint and feedback mechanisms.	Yes/No
22	No referral is made without the consent of the complainant. With the Option for the complainant to remain anonymous.	Yes/No
23	To the best of ability all complainants are notified and given an explanation of the decision made regarding their case.	Yes/No
24	To the best of ability all complainants are informed of the right to appeal	Yes/No

Records & Data

Recordkeeping is systematic, and records are maintained, up to date and accurate.

25	Only the minimum information required to conduct the complaint or to provide feedback is collected, as specified in the policy.	Yes/No
26	Any category, priority and sector classifications are applied to each 'record', as specified in the policy.	Yes/No
27	Non-identifying information is analyzed, and trends are discussed or reported on a quarterly basis to feed into learning of stakeholder needs and programme adaption.	Yes/No

Risks

Privacy and confidentiality are valued, and personal information is responsibly collected, used and protected.

28	Access to and use of complaint records is by authorization only. Information is password protected.	Yes/No
29	Complainants are told of the organizations confidentiality policy, and they are asked if they consent to give personal information and understand how that information will be used.	Yes/No
30	All staff collecting information are trained on safe referral and identification protocols.	Yes/No

If your organization does not meet these minimum standards please take steps to review your complaints & feedback mechanism. If your organization needs support please email the sector coordinator in your area, and the Inter-Agency coordination, lebbeia@unhcr.org