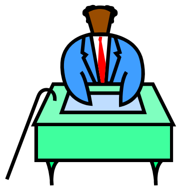
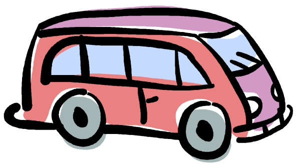
Accountability to Children Breakthrough

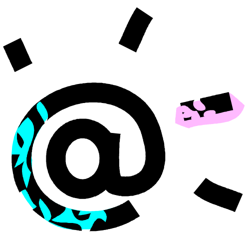
SETTING UP COMPLAINTS RESPONSE MECHANISMS

A guideline








DRAFT FOR PILOTING

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Save the Children

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1. OVERVIEW

1.1 Purpose of the Guideline

Save the Children is committed to making itself *accountable* to the children and communities we work with and for. A key element of this commitment is the need to establish **Complaints Response Mechanisms (CRMs)** in all of Save the Children's programmes. These mechanisms involve simple procedures, which will provide a safe opportunity for all those involved in, or affected by, a programme, to raise their concerns/ lodge complaints relating to the programme and its implementation and staff behaviour and ensure that their frustrations or concerns/ complaints are investigated and responded to.

This Guide aims to provide practitioners with the necessary understanding and advice on the steps involved in setting up effective CRMs.

1.2 Definitions

Complaint – refers to feedback from a programme beneficiary or someone affected by a humanitarian or development programme, in which they express their concern to the organisation responsible. The concern may relate to the programme or to the actions or behaviour of the programme staff or local partner staff. The complaint should be directly related to the commitments made by Save the Children (either in terms of what it has promised to deliver, or in terms of how it delivers aid).

Complaints Response Mechanism – a formalised process known and understood by beneficiaries and others affected by an agency's programmes, it allows the channelling of complaints and their objective investigation and response.

Feedback is a positive or negative informal statement of opinion about someone or something – an opinion shared for information but not with the intention of lodging a formal complaint. A complaint always requires a response, whereas feedback may not.

Language considerations

The use of the word '*complaint*' may be misleading or problematic, particularly when translated into different languages. It may be viewed as negative and confrontational, in which case you could consider other terms for the CRM including local terms. For example possible alternatives include:

- **Feedback Mechanism,**
- **Concern Response Mechanism,**
- **Beneficiary Satisfaction Mechanism** (used by a Kenyan NGO working with children).

In some European and Latin American countries, the term '*ombudsman*' would be more appropriate, whilst in the Middle East the term '*divan*' or '*matalem*' would be widely understood.

1.3 Save the Children and Accountability

Save the Children views accountability as giving beneficiaries, especially children and their carers

- a voice,
- the opportunity to influence relevant decisions affecting whether and how we work with them and
- the power to hold us to account in ways that influence the organisation's policies and priorities and actions at local, national or global level.

Accountability goes beyond participation. It is a process by which an organisation becomes answerable for its actions and the consequences that follow. It means opening up the organisation to increased scrutiny from children and their carers and allowing them a greater say in the direction of its work.

What do children say about accountability?

Save the Children's Global Children's Panel (GCP) says:

1) Keep your promise – do what you said you would do
2) Communicate well with children
3) Be faithful – have an open, respectful and honest working relationship with children

Accountability to children matters:

- As a matter of **principle**
- As a mark of **credibility**
- As a means of making programmes **more effective**
- As a pathway to promoting **good governance**

According to the Humanitarian Accountability Partnership (HAP), **accountability is the means by which power is used responsibly**. It is a process of taking into account the views of, and being held accountable by, people affected by the exercise of this power.

Save the Children is a member of the **Humanitarian Accountability Partnership (HAP)** and is working towards full implementation of all six HAP Standard benchmarks in its programmes.

HAP

HAP was established in 2003 to promote accountability to people affected by crisis and to acknowledge those organisations that meet the Principles of Accountability, which the founding members developed as a condition of HAP membership. By applying these Principles, an organisation makes itself accountable for the quality of its work to people it aims to assist and on whose behalf it is acting.

All children have the right to be given power, power that does not make them arrogant but builds them and helps them develop: the POWER to speak and raise opinions

The HAP Standards

- Delivering on commitments
- Staff competency
- Sharing information
- Participation
- Handling complaints
- Learning and continual improvement

Our **Accountability to Children Breakthrough: "Children and their carers are able to hold agencies to account – we've helped establish systems, standards and widespread good practice of child participation and accountability to children",** is a key objective of our Change for Children Plan (2010–17) and will be supported by investment of £250,000 per year for three years from 2011 to 2013. Part of these funds will cover the cost of a new Accountability to Children Advisor at Head Office, Burcu Munyas Ghadially. Most of the funds will be targeted to country programmes (£10,000 per country for up to 15 countries, each year), enabling them to develop and integrate mechanisms for improved accountability to children in their work.
A CRM is an essential component of accountability - establishing formal and user-friendly complaints response mechanisms in all its programmes, will mark a significant advance in Save the Children's commitment to beneficiary accountability.

1.4 The Benefits of Complaints Response Mechanisms

Save the Children has a moral and legal responsibility to ensure that our humanitarian interventions and development programmes are implemented as effectively as possible - listening and responding to the concerns of children and community members helps us achieve this. Making ourselves accountable through the use of CRMs, not only benefits children where we work but also staff, managers and the whole organisation.

Benefits of CRMs:

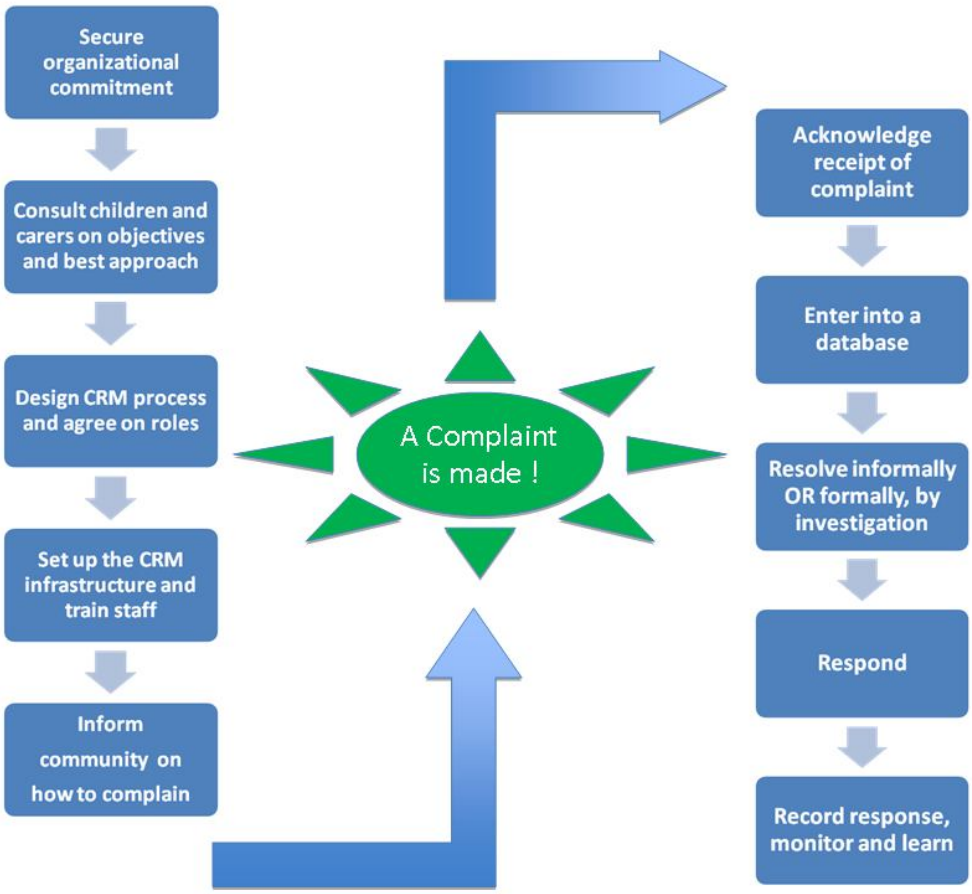
- Enable us to capture and respond to the views and concerns of the children and adults we work with and for.
- Increase trust and communication between ourselves and the communities where we work.
- Enable us to correct our mistakes, better target our aid and quality of support, and to use resources more effectively.
- Lead towards improving the quality, relevance and effectiveness of programmes.
- Enable us to identify problems and issues early on and deal with them and to resolve misunderstandings that could become bigger problems.
- Enable us to learn about possible negative side-effects of our interventions.
- Lead to increased community ownership of programmes.
- Deter fraud.

Examples of improvements on the ground as a result of CRMs in two Save the Children programmes:

Helped **save time** for staff in the field and area offices by identifying gaps in coverage and enabled response to suggestions on how to **improve the food distribution system**. It helped the programme to **reach more than 100 families** whose needs would otherwise have been overlooked (Save the Children's Humanitarian Response in Myanmar).

A community member complained **that health staff were arriving late and were not polite to patients**. The Field Programme Manager and Health Coordinator visited the health facility to investigate and work with staff on **improving behaviour and practices**. (the Makeland Response Programme, Pakistan).

2. THE STEPS TO **DEVELOP AND IMPLEMENT** A CRM



2.1 Secure organisational commitment to setting up a CRM for your project

When starting to set up your CRM, it is critical to obtain staff buy-in for the process from senior management to field staff. It is also important to think about the role of partners, the context of the programme and the resources we need to allocate for the process. Here are some points to consider:

Securing staff buy-in:

- Although Save the Children intends to recruit staff dedicated to accountability at field level, it is important that all staff recognise the need and importance of implementing a CRM.
- It is important to discuss the benefits the CRM can bring in terms of greater impact, greater community involvement and ownership, and greater job satisfaction.
- Including the setting up of a CRM in the programme planning stage will ensure greater staff buy-in.
- The CRM should be seen as a positive tool, with opportunities for staff training to support them to handle and respond to complaints effectively.
- Save the Children's experience in Myanmar and Pakistan highlights that consulting with staff who know the community well contributes to setting up an appropriate and effective CRM.
- Consulting with staff and clarifying that Accountability Officers / monitoring staff working on accountability are not 'spying' on, or interfering in the work of other staff, ensures good working relationships and increases ownership of the CRM by all staff.

Working through partners
In programmes where we work through partners, procedures should allow beneficiaries and others affected by the programme to complain to the partner as well as to Save the Children. It will therefore be necessary to work with partner staff to get their buy in as well as train them in setting up and managing a CRM. The CRM could be set up in a way to allow for our partner to complain to us and vice versa.

Consideration of the programme context

- Establishing a CRM in a humanitarian programme will need to take into account different issues and challenges than in a longer-term development programme. However, in both cases, **the CRM should be developed at the programme design and planning stage.**
- In the humanitarian context, **security** is an important factor and may influence whether Save the Children can openly communicate about its work or publicise the CRM. A risk assessment should be conducted. The mechanism for gathering complaints may need to be linked to food / aid distribution points and/or peer education initiatives in order to be easily accessible to beneficiaries.
- In the development context, it is important to distinguish the difference between **a formal CRM and regular feedback gathering** and review exercises that are integrated into a programme. Feedback may be a positive or negative informal statement of opinion about someone or something – an opinion shared for information but not with the intention of lodging a formal complaint. A complaint always requires a response, whereas feedback may not.

Allocation of resources - Budgeting for CRMs
Whether small or large, a CRM requires financial resources and time to establish. Resources are required to cover the cost of the following:

- An Accountability Officer at field level or for the Accountability Officer responsibilities to be incorporated into another role. (Depending on the amount of resources available and size of the programme, it may be possible and appropriate to include more staff dedicated to working on accountability both in the field and in regional offices, in order to include a number of CRMs across a region.)
- The CRM could involve establishing a Complaints Panel/ Hearing Committee to review complaints, which includes representatives from the community / partner agencies. If this is the case, then travel and logistical costs would need to be allocated to this activity.
- Staff training, travel and per diems
- Consultation sessions with communities
- Information, education and communication materials.

Common misconceptions / myths in relation to CRM

Worry that the CRM will be inundated with complaints that the agency is unable to address, because they relate to issues outside the agency's remit or responsibility.

We can address this concern by making sure that we communicate well to the communities what kinds of complaints we will be responding to, and make it very clear what kinds of complaints we will not, and cannot address.

Barriers to complaining	How to Overcome
Fear of losing our services	Communicate the principle of non-retaliation, i.e., as a result of complaining, complainant won't lose access to our services.
Concerns about personal security and well-being	Communicate the principle of confidentiality – that the complainant's name and files will be kept anonymous.
Accessibility (physical, economic, educational barriers)	Consult with communities on which mechanism to use and how to make it more accessible. To ensure accessibility of different community groups to the mechanism (illiterate, disabled, etc), put in more than one mechanism in place.
Lack of hope for a response	Keep record of your complaints in a complaints database, and report to the communities on a regular basis on the number and type of complaints received, and summary of responses provided except for confidential cases. This will demonstrate to people that we are responding.
Lack of culture for complaining	As we set up effective mechanisms, and respond to complaints, and report to the communities on our responses, this will demonstrate the benefits of using the CRM for program quality and improving relations between us and the communities, hence changing the culture.
Lack of information on how to complain	Inform communities on the mechanisms that are in place and how to use them. This can be done in meetings, using posters and information boards and community reference groups.
Gender norms	Consult with women and men separately and ask them what mechanism each would feel most comfortable with. If women find it difficult coming to us to voice concerns and complaints, we must go to them!
Children: "They won't believe me."	We have to always demonstrate that we are ready to listen to children and believe them in good faith, especially with regards to child safeguarding issues.

In order to address these and other challenges which may arise, refer to the checklist opposite, which includes a number of useful factors to consider when developing a CRM.

Checklist - Issues to consider:

- Is **'complain'** a sensitive word in the local language? – discuss what it means and find ways to ensure that it makes sense in the local language / culture
- The **literacy rate** amongst children, women and men
- Whether there is a **'culture of complaining'** or is making complaints taboo?
- Whether there is an existing **traditional system** for complaining locally? Is it formal /informal? What does it handle and how?
- How **marginal or vulnerable groups** might access the mechanism. Consider what might prevent them from coming forward to complain.
- **Who can children talk to** – who do they trust and what would work best for them?
- If a **central location** is used for complaint submission, where would be best?
- Where would be most **safe and accessible**?
- **Who** do people prefer to talk to? Is it acceptable for women and girls to talk to unknown men? Do people trust their leaders?
- What are people's **existing commitments**? When are the **best times** to access people?
- **What communication is available and preferred**? (Written? Verbal? Do people prefer to go to a central place to complain or have people come to them?) Do people prefer to be anonymous or are they happy to put their name on complaints? Would they be happy for someone else to complain on their behalf?
- Are there any **conflicts** in the community / further afield that will impact on the mechanism?
- Are there any **political issues** or issues with authorities to be aware of?

2.2 Consult children and their carers and partners to determine best approach

Discuss with children and their carers and our partner organizations our need for feedback and their right to complain if they are unhappy about what we do and how we do our work, as well as the behaviour of our staff. Present different types of CRMs and explore with them the mechanisms that would make it easy for them to provide feedback and complaints.

See *Tips for Consulting Children* box for exploring mechanisms with children.

Tips for Consulting Children

Meet in a place that is welcoming to children and at a time that does not conflict with their existing commitments. Be prepared to organise children into groups reflecting their age/ ability to participate.

Identifying opinions and preferences:
Body mapping, drawing, drama, role-play, puppetry, risk mapping, a day in our life, focus group discussions, transect walk, picture cards, value line discussions.

Prioritising:
Dot voting, diamond ranking, matrix ranking, movement voting, pots and beans, happy, sad, neutral faces

Analysing:
Problem tree analysis; Why? Why? Why?; SWOT analysis; footsteps exercise – steps forward to an agreed goal/ vision, barriers and suggestions to overcome barriers.

Action Planning:
How? How? How?; visioning and action planning – who will do something, when, where, what will they do and how?

Monitoring:
'H' assessment – encouraging children to explore strengths and challenges and suggestions, Timeline, before and after body map, pots and beans, circle analysis (exploring issues around inclusion and exclusion.)

2.2.1 Who to consult?

In order to determine who to consult and who will be the main users of the CRM, work with local staff to develop a **stakeholder map** – include existing and potential beneficiaries, vulnerable/ hard to reach groups, partners, donors, and authorities. Take into consideration what your partners/ other operating agencies are doing). Once stakeholders are identified, consultation meetings can be planned with the different groups.

2.2.2 Agree with people on what can be complained about and how complaints can be dealt with

When consulting stakeholders on categories of complaint, the following steps can be followed:

Brainstorm categories of complaints which are valid. Agreement should be reached as to what is a **valid complaint** and how to handle '**sensitive**' complaints. A valid complaint is one that relates directly to the commitments or approaches Save the Children has promised to adhere to. Complaints or comments that relate to issues outside of Save the Children's control may be referred to other agencies, at the discretion of the programme, but cannot be addressed through Save the Children's CRM. Such complaints could include complaints about land disputes, internal community disputes, the actions of government and external agencies, and requests for aid. A **non-sensitive** complaint concerns the quality of programme work or a programme decision/ advocacy/policy position taken by Save the Children or a partner organisation with whom Save the Children works. A **sensitive complaint** relates to staff/ volunteer behaviour – it could include corruption, favouritism, discrimination, sexual exploitation or abuse or another gross misconduct or malpractice.

Clarify that complaints about abuse/ child protection issues, will be handled through the child safeguarding policy and that responses to complaints about staff performance may be guided by disciplinary procedures.

Consider who will be likely to complain and what they might complain about – this will help you select the most appropriate tools and methodologies for channelling and responding to complaints.

Examples of complaints received through CRMs in Save the Children Programmes

- Feedback from children and teachers in the Early Childhood Care and Development Centres pointed out the dangers of children sleeping without mosquito nets for children taking their afternoon naps at the centres (Humanitarian Response in Myanmar).
- A community member complained that the ambulance driver asked him for money for providing the ambulance services, which should be free of cost (Emergency Response and Recovery Program, Pakistan).

2.2.3 Determine Entry Points

Once it has been agreed what constitutes a **valid** complaint and a **sensitive** and **non-sensitive** complaint and you have determined who the users of the system will be, the entry points or the channels for submitting complaints to the CRM should be determined. In order to be able to facilitate both sensitive and non-sensitive complaints and best meet the needs of different groups in the community, **more than one approach (multiple entry points)** for submitting complaints will be necessary. For example, non-sensitive complaints could be gathered through open sessions, whilst more sensitive complaints will require confidential and private access. When selecting entry points, take into account what you have learned from consulting the community and issues you have explored in the *Checklist – Issues to Consider* as well as the following principles: accessibility, safety for users, transparency, impartiality.

Although **anonymous complaints** are difficult to investigate and may be linked to rumours, children and other people may find it easier to complain if their anonymity is preserved. The information from the complaint should be captured in a **standardised written form** if possible and the person making the complaint be provided with a written token with a number indicating that the complaint has been received and will be responded to. This system can be made child-friendly i.e. children receive a smiley face with a number on it and are given clear information regarding when they will receive a response. The pros and cons of a number of methodologies are outlined in the table below.

CARE Peru employed a **Monitoring, Evaluation and Standards Advisor** in its response to the earthquake in Ica in August 2007. It established a free telephone line as an entry point for the CRM. 100 complaints were made and responded to in the first month, mostly from women. Complaints could also be made through CARE's website, at its office or by addressing field staff, including through focus group discussions. Community members were involved in investigating the complaints and seeking resolutions.

Entry Points / Channels for complaints		
	Pros	Cons
Suggestion/Complaints Box (locked)	Complaints can be put in the box at any time. Enables children and carers to make anonymous complaints. Because it is in writing, there is less room for misinterpretation.	Complaints are written so can only be used by literate groups, users do not get guidance on procedures while writing complaint. Requires regular collection and responses.
Open Door Hours-Fixed days when field office open/ camp committee available to receive complaints (recorded in log book)	Field staff/ camp committee may be able to solve problems on the day. Provides the opportunity to work with groups of children using role-play and games.	Many community members may come to submit complaints at the same time and the office could become crowded and noisy. May be inconvenient for community members to access.
Log book (completed by staff on field visits or volunteers)	Quick set up. Cheap and does not require lots of training. Allows staff to consolidate major issues daily	Not systematic. Relies on staff recording information to recall details and to prioritise. Cannot be tracked easily.
Telephone line	Accessible to non-literate users, allows SC to maintain a certain level of anonymity and security.	May be difficult to promote the hotline due to security considerations. Not easy for children to access. Someone must be available to answer the phone at the agreed times. If it is not a free hotline, calling costs may deter people.
Information Centres linked to food distributions (SC in Myanmar)	Easy for people to access and do not have to make a special journey. Can reduce tensions between community and project staff and build trust. Can talk to beneficiaries, rather than rely on views of community leaders.	May be crowded, tensions can be high. May not offer enough privacy for people to express their concerns. People may be reluctant to criticise if they are about to receive assistance. May not be appropriate for children as they rarely come to collect food aid.
Information Centres linked to child friendly spaces where peer educators were based, using drawing and writing cards (SC in Myanmar)	Accessible to all children without discrimination. Encourages problem solving, is confidential and quick. Enhances children's participation and enables them to express their feelings.	May be difficult to analyse the content of the drawings and they may refer to problems beyond SC's control. Requires materials (paper, pens, pencils). Dependent on peer educators with good leadership and communication skills, which may not

		always be available.
Information booths open regularly in the programme implementation areas	Can be closer to different sections of the community. Also encourage general communication	Need to assign staff to operate these and ensure safe access for users.
Internet/ email complaints submission	Can be appropriate for partner complaints or complaints directed to HQ	Many people will not have access to the internet in programme areas.
Mobile text message	Can be effective for work with young people in certain contexts (e.g. SC Wales programme).	A free number is needed
Local agencies (trusted by Save the Children to collect complaints)	Communities may be more honest with intermediaries than with the agency giving aid.	Could be manipulated by the local agency. People excluded by existing power structures may continue to be excluded.
Village/ community meetings weekly/ monthly	Issues can be discussed and potentially addressed on the spot.	Good for general issues but does not allow for sensitive complaints to be raised.

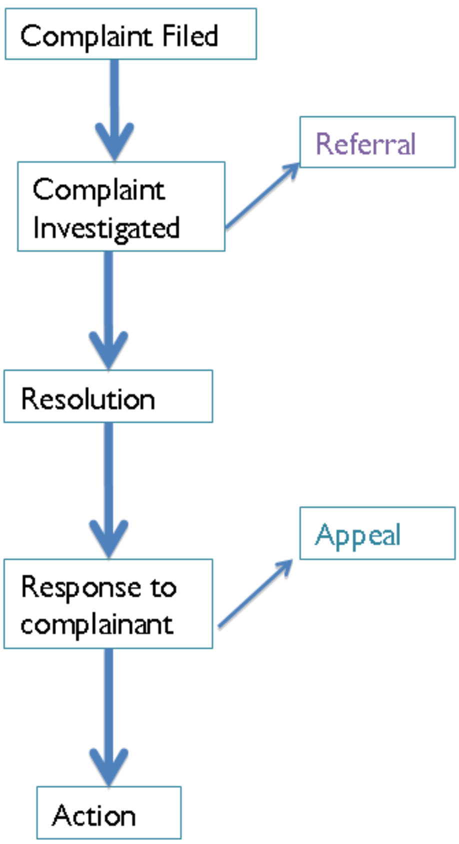
2.3 Design CRM guidelines and agree on roles

The CRM Process:

During the design stage, you need to think about:
1 – Process and tools
2 – Roles and Responsibilities
3 – Resources necessary to implement the CRM

2.3.1 Process and tools

Based on the entry points you have identified with the communities, you will need to think about the procedure for processing complaints. The process should be logical and easily understood by staff and beneficiaries, including children. It will be helpful to develop a flowchart for the management of information and to set out a timeframe in relation to the investigation of complaints, their resolution and response to be given to the complainant. Further guidelines will be developed as example processes for the different entry mechanisms, such as complaints boxes, hotlines, children's feedback committees, etc.



Our CRMs must be robust enough to handle concerns and complaints about child safeguarding. For safeguarding issues, we deal with any concerns and not necessarily confirmed complaints. At Save the Children UK, we have well established procedures and guidance to deal with concerns of child safeguarding nature. Please see the **Global Child Safeguarding (Suspected Abuse) Procedures Toolkit** on the intranet, which has a flowchart for responding to safeguarding concerns outside our London offices, and management roles in child safeguarding.

Some complaints may have some far-reaching consequences for Save the Children and /or the complainant, so you should try to anticipate the full extent of the process from the outset so that these can be well managed and a satisfactory outcome can be reached.

There should be a selection of entry points and various formats through which complaints can be filed. Once the complaints are collected via the entry points, they need to be recorded on a standard format and, where necessary, coded to protect confidentiality. The use of a **standardised complaint report format** enables the easy entry of information onto a complaints database. This is a simple excel sheet containing the information listed in the box below. Please see the **Child Safeguarding –Reporting Suspected Abuse Policy** for guidance and reporting formats for concerns and complaints about child abuse cases. Records should be stored securely to avoid accidental or unauthorised disclosure of information.

Complaint Database, (managed by a field-based Monitoring, Evaluation and Accountability Officer, Save the Children, Emergency Response and Recovery Programme, Pakistan). This is a simple excel sheet containing:

1. Date complaint received
2. Sector/ program
3. Name of complainant (optional)
4. Can we call the complainant? (Y/N)
5. Can we visit the complainant? (Y/N)
6. Phone number to deliver response to (if permitted)
7. Village, Union Council, District
8. Description of complaint
9. Person complaint referred to (field program manager, coordinator, etc.)
10. Description of investigation & resolution process (by MEAO, field staff, etc.)
11. Description of resolution
12. Staff member who communicated resolution to complainant.
13. Date closed

2.3.2 Roles and responsibilities

During the design stage, you need to consider who will receive, register and participate in responding to your complaints. The roles of different staff and stakeholders within the CRM should be clearly defined and communicated. A **complaints handling committee,** or an **investigations committee** could be formed. In this committee, you may think about having representatives from SC, partner, community, local government and donors. The ultimate decision for criteria of selection and representation rests with your team and the community.

Please note that our Child Safeguarding policy clearly outlines roles and responsibilities for dealing with child safeguarding concerns/complaints at country, region and HQ levels. See **Save the Children Management Roles in Child Safeguarding Tool**, which is part of the Global Child Safeguarding (Suspected Abuse) Procedures Toolkit.

Below are some thoughts on roles and responsibilities:

- **Senior management / head of agency** – the head of the agency has ultimate responsibility for the agency, and for the CRM. 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) as another authority with which to lodge the complaint.

- **Programme /field staff** – many non-sensitive complaints can be directly managed and handled by programme staff. However, if it is about them directly or if it is a sensitive issue, they may need support from more senior or specifically designated staff. In many cases, communities report they are not comfortable complaining directly to field staff working with them every day, but would be content to complain to someone from the agency that is perhaps a bit more removed or more senior e.g. the area manager or the Beneficiary Accountability Officer.

- **Beneficiary representative(s) -** having a beneficiary/ies or stakeholder representatives involved in the complaints process can increase transparency and legitimacy, but they don't always have the authority or knowledge to identify all the possible solutions. When involving children on Complaints handling committees, they will need training and support to ensure their participation is meaningful.

Donor, or other partner NGO – an external and relatively unbiased stakeholder can add value in terms of legitimacy and in terms of possible flexibility – for example, by being able to offer alternative responses such as the reallocation of funds or support for the investigation.

Tearfund's experience with Beneficiary Reference Groups (in emergency programmes in northern Kenya for pastoralists affected by drought).

- Beneficiary Reference Groups (BRGs) were established in 10 communities, consisting of young people, women, elders and church volunteers.
- BRGs acted as the community' 'eyes', receiving local questions, feedback and concerns and working with Tearfund staff and other NGOs to address the issues as quickly as possible.
- The BRGs were pivotal in enhancing participation and transparency during the emergency programme. They did not control resources but could help ensure that beneficiaries were identified fairly. They also enabled Tearfund to hear the views of the more vulnerable groups.

2.3.3 Resources

Ideally, you will have already budgeted for setting up a CRM for your project. (See the section on Budgeting for CRMs in Section 2.1). You will need resources for setting up the infrastructure, e.g. setting up a hotline, buying mobile phones for staff, or buying complaints boxes and placing them, or allocating more of staff time to spend with the community.

2.4 Set up the complaints handling infrastructure

Once you have designed the process and determined roles, procure the materials you may need (complaints boxes, banners, toll free number and mobile phones for a hotline, etc) and set up the infrastructure in the community. During this process, you will need to think about:

Accessibility

a. Make it possible for children and their carers in remote locations to be able to access the system
b. Receive complaints both verbally and in writing, to enable illiterate member of community to complain
c. Make it possible to file a complaint on behalf of somebody else (owing to their illiteracy, fears for personal safety, inability to travel, etc)

Staff training

a. Ensure the staff who will be managing the mechanism know the guidelines and how to implement the mechanism.
b. Ensure staff are aware of the Code of Conduct, Child Safeguarding Policy and local procedures for reporting child safeguarding concerns.

2.5 Inform the community on how to use the CRM

Communicating information about the CRM is key if its purpose is to be widely understood and people are going to use it. People need to know how to use it and what to expect from it.

The essential elements to be communicated are:

- Information about Save the Children;
- Information about the programme;
- Information about the behaviour to be expected from Save the Children staff; ie, our Code of Conduct;
- Information on child safeguarding, what constitutes abuse, duty to report and CS procedures
- Purpose of the CRM;
- Parameters: what to complain about? (Issues about our programs and staff behaviour) Limitations: what will not be responded to.
- Who is allowed to complain?
- How and where to complain?
- Principles of non-retaliation and confidentiality.
- The process by which we will respond, timeframe for response, appeals process, etc.

The **choice of method for communicating information** about the CRM will depend on the context, literacy levels, security considerations and audience etc. However, information should be visible, easily understood by children and easily available such as via:

- Notice boards.
- Leaflets.
- Posters.
- Community meetings.
- Separate meetings, facilitated with children at a time convenient to them, to ensure that they fully understand the CRM and have the opportunity to ask questions.

In situations where security is volatile and the organisation is operating a *'no visibility'* policy, the use of visual publicity relating to the CRM may be inappropriate. For example, SC Flood Response programme in Pakistan operates in such a situation. They have set up a hotline for complaints operating under a no visibility policy. They do not display SC logos, but publicize the hotline on information boards with the following statement: "This number is for an organization supporting health, child protection, livelihoods, and other community development programs."

Procedure for consulting on and communicating about the Joint Complaint and Response Mechanism (JCRM)
(Developed by Save the Children and partners working together on the emergency in Haiti, with the support of HAP)

1) Consultation - In designing the JCRM, two focus group discussions were held with i) camp committee members, and ii) the wider camp community to present the plan and adapt it based on their input. The meetings were used to identify: a) the types of complaints people might have, b) if they feel the submissions methods would be suitable for raising the types of complaints they might have, c) what barriers they and others might face in using these, d) key factors the NGOs need to consider when processing the complaints.

2) Communication - Details about the JCRM were shared with the camp community via written and verbal means. This included a joint public meeting to launch the JCRM, to raise awareness on its purpose and how it can be used.

A complaint is made or a concern is raised

Once a complaint is made, or a concern is raised, we need to:

2.6 Acknowledge receipt…

…of the complaint to the complainant. Some organizations do this via delivering a paper receipt to the complainant which documents the date of complaint, brief outline of complaint, date by which complainant should expect a response and how to appeal. If you do not have the resources to deliver a paper receipt, try to think of cost effective ways of delivering this information.

2.7 Enter it into a database

At this stage, if we are dealing with a sensitive complaint, securing the confidentiality of the complainant can be very important. Keeping complaint files confidential is critical. Only those involved in the complaints resolution process should have access to these files or be involved in discussions.

2.8 Resolve

It should be decided if the complaint is *sensitive or non-sensitive* and then clear procedures should be followed for how it will be investigated, and by whom.

2.8.1 Resolve Informally

The majority of complaints SC receives will be resolved immediately with common sense and knowledge of the programme. Staff must be encouraged and supported to do this if at all possible. If a complaint is immediately resolved, it is still good practice to fill in the complaint registration form, adding what was done to remedy the complaint. For non-sensitive complaints, it would be expected that a response could be given in for example, 3-5 working days.

2.8.2 Resolve formally - by Investigation

Some complaints about programmes and/or staff ways of working cannot be resolved immediately or easily, especially in cases of staff misconduct. It is good practice to use staff (or partners or community members) not directly involved with the programme/project to carry out/be part of an investigation procedure. In many cases, it is good practice/necessary to 'escalate' a complaint to have it investigated at a more senior level or by those with appropriate expertise.

If complaint is about staff sexual misconduct or sexual exploitation, staff malpractice and fraud, contact your country, regional or corporate HR, with reference to Child Safeguarding Policy, Code of Conduct, Whistleblowing Policy and Fraud Policy, as appropriate.

In relation to sensitive complaints, Save the Children should commit to taking immediate urgent action within 24-72 hours (which may include ensuring medical treatment and making a decision on investigating). In the case of an allegation of sexual exploitation or abuse, if there is information to suggest that sexual activity has occurred, medical treatment should be provided within 72 hours. If a decision is made to investigate, the investigation should take place within 30 days.

Sensitive complaints will need to be investigated appropriately to determine their validity, understand what has happened (breach of commitment) and what action needs to be taken. Designated, trained staff should carry out the investigations, guided by clear procedures for investigating the different types of complaints. For example, if there is an **Accountability Officer**, then complaints could be handled by this person at field level, who will consult with more senior accountability staff or other decision makers when necessary. Some organisations have established **Beneficiary Complaints Committees** (Tearfund) or **Complaints Handling Boards** (Danish Refugee Council – consisting of a community representative, the Information Manager and Project Manager). If you are going to establish a Complaints Board then you need to decide who is represented on this body and establish procedures to ensure that it is impartial, legitimate and that confidentiality is maintained.

Referrals— If the resolution of the complaint is outside Save the Children's control, it should be referred to an appropriate body. This can be the local government body, or HAP, which offers assistance to its members if they are unable to resolve them. If it is within our control but we do not have the capacity in country to deal with it, referrals can be made to relevant regional or HQ colleagues to help with resolution.

Points for consideration

The following points should be considered when investigating and responding to complaints:

- Are the complainants (and the agency) prepared for the implications of the investigation?
- What role will the complainant have? Will they be willing to come out publically to say what their concern is?
- What is the agency prepared to do and what are they not willing to do?
- Under what circumstances will the complainant want to stop or not go further with the investigation? Or when will the agency itself want to stop the investigation?
- Anonymous complaints will need to be investigated and responded to in different ways. For example, if someone complains that the agency is missing some beneficiaries from the list, once this is investigated, it may be necessary to respond to the whole community as to how decisions were made about the beneficiary criteria, ie. through a group meeting and / or information on a village / camp information board.
- In some cases, potentially malicious or unsubstantiated complaints may be made by people which can be very damaging if not dealt with. These types of complaints can sometimes give indications to the agency that there are other issues that people may be reluctant to bring up, or that they have concerns about the integrity of the CRM, so it can be a useful warning signal to the agency.

Putting the CRM into practice – Tips

Dos	Don'ts
Actively solicit complaints from beneficiaries. This makes it clear that you are willing to provide redress, when it is justified.	**Ignore** a complaint
Raise community awareness of their right to make a complaint and to receive a response	Establish a CRM that is **difficult to access by vulnerable groups** or can be manipulated by elite groups
Use information from complaints to **improve programme impact**	**Fail to investigate** and act on feedback and complaints
Make sure staff are well **trained to handle complaints** and know what to do when they receive feedback	Forget to close the feedback loop – **remember to report back**
Staff who hear complaints or **rumours about more sensitive issues** including staff behaviour must immediately inform their Programme Sexual Exploitation and Abuse (PSEA) focal person.	**Overlook hints** dropped by children who may not feel confident in voicing a complaint
Help develop an **internal learning culture** where feedback and complaints are welcomed and not feared by staff	

2.9 Respond

- Make sure each complainant receives a response and appropriate action. Give people a response to their complaint within 10 working days of receipt (or within an agreed timeframe in country). If you are unable to respond to the complaint within the agreed timeframe, then acknowledge this to the complainant. The complainant must also be told what is being done with their complaint and when they are most likely to receive a response.
- Responses should ideally be given in written and verbal form, be sensitive, with a clear explanation and recorded to show a response has been given. Explaining to the complainant

how the organisation is dealing with the complaint is key, or if outside their control, why it has been referred.

- Be consistent: ensure similar complaints receive a similar response
- Record the response in your complaints database.
- Maintain oversight of complaints processes and always inform partners and children and their carers of their right to appeal to the Country Director or their designate.
- **Appeal -** This is a ***'higher'*** or another level of response that can be requested, to check whether the initial decision or response was appropriate. The outcome of the appeal will be to decide whether to uphold the original decision or make a new decision based on the second investigation or review of the previous process. The appeals process should be clearly defined: when it can be used; how it will work, who will be involved in it.

2.10 Record, Monitor and Learn

- Looking at the number and type of complaints you get, evaluate accessibility of your mechanism and the effectiveness of the outreach with children and their carers on how to use it. The box below lists some of the main elements which should be assessed when monitoring and reviewing the CRM. Monitoring can involve a range of approaches such as periodic surveys with users of the CRM, review of records, analysis of actions taken as a result of complaints, assessment of time taken for resolution of complaints.
- Collect statistics and track any trends and ensure learning among team and wider organization from complaints and mistakes
- Feed learning into decision-making and project activities
- Share the learning as appropriate with colleagues in country and within your region
- Report the complaint and its resolution in your monthly or quarterly reporting to your manager.
- Report to the community on a regular basis on the number and type of complaints and how they were dealt with in a manner that does not infringe upon the confidentiality of the cases.

Guidance for monitoring and reviewing your CRM

- Has the CRM been established through **beneficiary consultation**?
- How do **staff** view the CRM?
- Is the CRM appropriate for the situation, country, programme **context?**
- Do people have **knowledge** of the CRM procedures?
- Is **physical access** to the CRM procedures easy?
- Are the procedures **non-threatening**?
- Do complainants feel **dignified**, are they treated with **respect?**
- Are **vulnerable/ excluded groups** in the community making use of the CRM?
- Is the CRM **child-friendly?**
- Are there **clear guidelines** regarding the kind of complaints to be received?
- Is the CRM used **regularly?**
- Are complaints **recorded and transmitted without changes** made to the content?
- Do complainants receive **tangible (written) acknowledgement** that complaints have been received?
- Are **time limits** for answers to complaints provided?
- Are complaints dealt with **confidentially?**
- Are **representatives from the community** (including children) involved in addressing complaints and resolving disputes?
- Do complainants receive a **clear response**, including reasons for the decision and an explanation of the process undertaken?
- Do complainants acknowledge that they have **understood the answers** they receive?
- Are complainants informed of **alternative grievance channels**?
- Are you keeping a **record** of the complaints received, the responses provided and the **decisions** made/ actions taken in relation to the programme/ staff behaviour?

3. LESSONS LEARNED FROM GOOD PRACTICE

Save the Children piloted a programme in the Mutorashanga district of Zimbabwe in 2005, which involved establishing seven **children's feedback committees (CFCs)** consisting of seven children (aged 10-17), selected by other children, spread throughout the district where food aid was delivered. An independent **Ombudsperson** was also selected to act as a contact between the CFCs and a **Hearing Committee** (comprising a representative from SCF, DFID, WFP and the district social welfare officer for Mutorashanga), to whom feedback and grievances were to be directed. The CFCs collected information on concerns from their communities and passed this through the Ombudsperson to the Hearing Committee.

- The CFCs provided a wealth of useful information relating to the food aid process as well as reporting allegations of abuse or exploitation of children both linked to the programme and unrelated to the humanitarian assistance.
- Save the Children had underestimated the ability of children to provide a range of useful and important feedback in order to improve the quality of its service delivery.
- At community level, there was an initial challenge in ensuring traditional power structures did not feel threatened by the CFCs and by their role of questioning the assistance to the community.
- The CFCs shed light on what happens in households after aid is delivered, such as the withholding of food from children who were stigmatised within particular families, the use of food to demand excessive work from children, the diversion of rations for sale etc. As a result the programme made efforts to address these issues.
- The CFC members reported that their involvement in the CFCs was a transforming experience as well as for those who elected them and their parents, guardians and local leaders, since they could see for themselves that children can play a role in informing community decisions that affect them.

The information centres Save the Children established as part of its humanitarian response to Cyclone Nargis in Myanmar in 2009, played a key role in sharing information about the organisation with the communities in the area and also as a channel for receiving and responding to feedback and complaints.

- The information centres received thousands of feedback forms within a year. More than half were dealt with locally or by the area office and some were referred on to the country office and even to the London office.
- Staff valued the feedback from the information centres, as they were able to make small but significant improvements to strengthen programme implementation and ultimately impact.
- The information centres were most popular with children aged 7-13, so other approaches are needed to reach younger children and older adolescents.
- Children involved with the information centres came up with their own songs, games and dramas to communicate about the programme and the role of the information centres in their communities.

4. RESOURCES AND REFERENCE MATERIALS ON CRMs

The content of these Guidelines has been developed with reference to a range of materials, which are listed below:

Save the Children Resources

- Accountability Matters in Emergencies, Listening to children and responding to their feedback during Save the Children's humanitarian response in Myanmar (Burma), Save the Children, 2010
- Accountability Framework for SC Emergency Response and Recovery Programme – Pakistan, MEA Unit, Pakistan, Save the Children
- Improving Accountability to Beneficiaries, The Malakand Response Programme's Initial Experience, Save the Children
- Children's Feedback Committees in Zimbabwe, An experiment in humanitarian accountability, Chris McIvor with Karen Myllenen, Save the Children, 2005
- Involvement of children and young people in shaping the work of Save the Children, A report to the SC-UK Board, Gerison Lansdown, Save the Children, 2003
- Definitions of Accountability to Children, from a paper 'Delivering Accountability to Children' created by Ken Caldwell, Save the Children, June 2009
- Accountability to Children Breakthrough, Briefing, Save the Children, September 2010
- Report - Global Children's Panel Meeting, Save the Children, 2010

HAP Resources

- The 2010 HAP Standard in Accountability and Quality Management
- Procedure for Joint Complaint and Response Mechanism (JCRM), LWF, Save the Children, World Vision, (developed with the support of HAP), Haiti, 2010.
- Literature Review: Complaints Mechanisms and Handling of Exploitation and Abuse, Veronika Martin, HAP, March 9 2010,
- "What happened next?" – Activities undertaken by agencies to strengthen accountability following the HAP deployment to Sri Lanka, HAP, 2010

Other INGO Resources

- Outline of Steps – for designing, implementing and reviewing a Complaints Handling Mechanism, CAFOD, 2010
- Disaster Management Team Good Practice Guidelines, Beneficiary Accountability, David Bainbridge, Eleanor Tuck and Kate Bowen, February, Tearfund, 2008
- Complaint and Response Mechanisms, Resource Guide First Edition, Food Programming and Management Group World Vision International, 2009
- The Danish Refugee Council: Complaints Mechanism Handbook, 2008
- CARE International Humanitarian Accountability Framework, Policy Statement and Guidance Note, Pilot Version, February 2010

Other useful reference materials:

- Sphere, Humanitarian Charter and minimum standards in disaster response, 2004
- Children as active citizens: A policy and programme guide- Commitments and obligations for children's civil rights and civic engagement in east Asia and the pacific, Inter- Agency Working Group on Children's Participation, 2008
- Causes for Complaint? How charities manage complaints about their services, Charity Commission, 2006
- The Good Enough Guide, Oxfam, Save the Children et al., 2007

FEEDBACK FORM

We would welcome your feedback on the usefulness and relevance of these Guidelines for your programme in order for us to effectively support Save the Children's programmes to be more accountable.

Please answer the following questions:

1) How useful were these Guidelines in helping you develop and implement a CRM? *(Please circle):*

Very useful **Useful** **A little bit useful** **Not at all useful**

2) Do you feel confident in being able to manage/ implement a CRM? *(Please circle):*

Yes **No** **Not sure**

3) Is there any information/ guidance you would have liked to see included in these Guidelines that is missing? *(Please specify below):*

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4) Is there any topic/ section in the Guidelines which you think needs more explanation? *(Please specify below):*

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5) Do you have any other feedback/ comments relating to the Guidelines? *(Please specify below):*

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Please send your feedback form to: Burcu Munyas Ghadially, Accountability to Children Adviser, b.munyas@savethechildren.org.uk
For further advice and support on developing and implementing CRMs, please contact: Burcu Munyas Ghadially, Accountability to Children Adviser, b.munyas@savethechildren.org.uk

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