Concern Worldwide

West Darfur Programme, Sudan

Paper on Complaint and Response Mechanism Pilot

Mornei, West Darfur

September, 2011

TABLE OF CONTENTS

Concern Worldwide
Paper on Establishing a Pilot CRM in Mornei, West Darfur

Section 1: Overview of Complaint and Response Mechanism

1.1 Introduction

Concern Worldwide is committed to beneficiary accountability which places the protection and welfare of beneficiaries at the centre of our decision making process. We recognise the intrinsic link between the programmes which we delivery and the welfare of those engaging with these programmes. Furthermore, we believe that the strengthening of our accountability commitments will contribute to maximising the impact which our programmes have on those living in extreme poverty. Concern's Global Strategic Plan 2011-2015 commits to, 'ensuring that we are more accountable to our intended beneficiaries and all other stakeholders for our agreed commitments and objectives'[1]. At a national level, Concern's North of Sudan Strategic Plan 2009-2011 (draft), states that we will 'be open and transparent in our relations with others, and accept responsibility for our individual and collective actions'[2]. While West Darfur continues to present a multitude of operational and programming challenges, and is likely to retain its political and security dimensions, Concern will strive to ensure such challenges do not inhibit our accountability commitments.

This document aims to guide the establishment of a pilot Complaint and Response Mechanism (CRM) in Mornei, West Darfur; from design and delivery, to monitoring and learning. The document outlines the rationale and objectives of a CRM and seeks to ensure that the necessary resources are mobilised to enable a transparent and effective CRM pilot in Mornei. It should be noted that this is a 'living document' and shall be reviewed in three stages 1) following staff training and community and stakeholder consultations in Mornei and 2) to reflect the findings of the pilot evaluation in Mornei and 3) following the development of a Humanitarian Accountability Framework for Sudan, if necessary. The provision of a CRM policy will be addressed following completion of the pilot phase, with this document providing initial guidance and direction.

1.2 Objective of CRM

The Humanitarian Accountability Partnership (HAP) defines a complaint as:

a specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment[3].

For Concern Worldwide this equates to:

'an expression of dissatisfaction about the standards of service, actions or lack of action, advice or products provided by Concern Worldwide, its staff or its partners. It is a criticism that expects a reply and would like action to be taken'[4].

A complaint mechanism can be defined as:

simple procedure and mechanism that give users access to safe means of voicing complaints on areas relevant and within the control of the agency[5].

---

[1] Concern Worldwide (2010), '*Strategic Plan 2011 – 2015, Greater impact in an increasingly vulnerable world'*, Concern Worldwide: Dublin

[2] Concern Worldwide, North Sudan (2008), *'Draft Strategic Plan 2009 – 2011, Accountability and Transparency are Our Cores Values'*, Concern Worldwide: Khartoum

[3] Humanitarian Accountability Partnership (2010), *'The 2010 HAP Standard in Accountability and Quality Management'*, Humanitarian Accountability Partnership International: Geneva

[4] Concern Worldwide (2010), *'Complaints and Response Mechanism Guide'*, Concern Worldwide: Dublin

[5] Danish Refugee Council (2008), *'Complaint Mechanism Handbook'*, Danish Refugee Council: Copenhagen

Concern believes that a CRM should provide:

safe, accessible, confidential and transparent channels for individuals, especially beneficiaries, to exercise their right to raise complaints about Concern Worldwide's decisions or actions and for a timely response to be given.

The delivery of a CRM is in line with Concern's Humanitarian Accountability Partnership (HAP) commitments, specifically Benchmark 5, which states:

HAP 2010 Standard
Benchmark 5
The organisation enables the people it aims to assist and other stakeholders to raise complaints and receive a response through an effective, accessible and safe process.

Concern's North Sudan HAP Baseline Report highlighted the significant progress in the dissemination and application of Concern's Programme Participant Protection Policy (P4) and Concern Staff Code of Conduct (C3). Additionally, a staff grievance policy is outlined in the respective International and National Staff Human Resource Manuals, in compliance with the organisation's HAP commitments. However, the report acknowledged that, 'there are no documented complaints handling procedures or complaints mechanism in place for partners and beneficiaries'[6].

A CRM **provides beneficiaries with channels through which they can lodge complaints against perceived or realised shortcomings in Concern's decisions or actions.** This must be supported by **community participation in its design and delivery and the sharing of the organisation's objectives and activities with communities**, as outline in HAP Benchmark 3, which states:

HAP 2010 Standard
Benchmark 3
The organisation ensures that the people it aims to assist and other stakeholders have access to timely, relevant and clear information about the organisation and its activities.

An effective CRM can provide a multitude of benefits to communities and an organisation's programmes. However, **failure to deliver an appropriate and transparent CRM can undermine an agency's credibility and has the potential to escalate into an environment of hostility and suspicion towards an organisation, its staff, actions and assets.** Among the benefits of a CRM are:

- A dignified and formal method for beneficiaries to lodge a complaint with an organisation.
- Strengthen community ownership and trust in the organisation and its programmes.
- Empower beneficiaries by promoting concepts of justice in the community.
- Provide information on the appropriateness and transparency of programmes.
- Reduce the likelihood of informal complaints or damaging rumours by providing a formal and institutionalised system of complaints and response.
- Improve programme design, approaches and delivery by beneficiary's complaints providing a quality check on the organisation's decisions and actions.
- Build staff morale and confidence by providing a localised programme quality measure.
- Enable prevention and response to fraud, corruption, exploitation and abuse.
- Provide an organisation with contextual insights that can otherwise be difficult to obtain.

Conversely, the establishment and functioning of a CRM can also pose risks to an organisation such as security considerations including increased visibility of staff and beneficiaries (lodging and

---

[6] Concern Worldwide (2010), *'North Sudan HAP Standard Baseline Report'*, Concern Worldwide: Khartoum

responding to complaints) and challenges in the handling of complaints of a sensitive nature. Guidance on such complaints will be provided in the following section.

1.3   Scope

A valid complaint is a complaint about decisions and actions for which Concern is responsible and must be both relevant and within Concern's jurisdiction. **Concern is held accountable for the promises and the commitments its make, what we do and how we do it.** Valid complaints against Concern include those in which it is felt we have fallen short of our commitments including decisions; activities; use of resources; our vision, mission and values; P4 and C3. **Ensuring clarity amongst communities as to what constitutes a valid complaint is crucial in order to avoid a CRM becoming overloading with complaints**, thus preventing frustration amongst complainants and potential users. Furthermore, it will reduce the amount of time being spent by staff in handling complaints which are beyond Concern's control.

Concern **can respond** to complaints about:

- Targeting of assistance/services (beneficiaries' selection criteria)
- Quality and quantity of assistance/services received from Concern or its partners
- Appropriateness of assistance/service received from Concern or its partners
- Behaviour of Concern and partners' staff and anyone associated with Concern's programmes[7]
- Misuse of Concern's funds
- Concern programme decisions

Concern **cannot respond** to complaints about:

- Other organisations[8]
- Issues not related to Concern's programmes
- The local or national government, local authorities, etc.
- Internal matters of the community such as physical violence between community members, marital disputes, tensions between various community groups and all other such matters which fall within the jurisdiction of the civil justice system
- Complaints which are under investigation by law enforcement agencies or matters under litigations/court trial

Concern recognises the potential receipt of complaints of a sensitive nature through a CRM. Complaints alleging a violation of the P4 by Concern or partner staff will be handed as prescribed in the P4 and its Guidelines. For complaints received which **fall outside the scope of Concern's CRM** such as domestic violence or sexual abuse, where possible Concern will assist the complainant in a safe referral to the concerned body.

Concern **can't provide a direct response or redress for the decisions, actions or behaviour of government staff**; including those with whom we work in partnership. However, Concern will refer the complaint to the relevant management in a safe manner and promote a timely response to the complainant.

---

[7] As defined in Concern Programme Participant Protection Policy this includes: i) people employed or engaged by Concern, whether national or international, full or part time, consultants, interns, contractors or volunteers, or any person actively involved in the Concern programme; ii) Concern's partner organisations, their staff and anyone working on their behalf; iii) visitors to Concern's programmes and accompanying dependants of international staff.

[8] In the context of Mornei where Concern assumes the role of Camp Coordination, this will need to be clearly communicated to staff and the community as Concern can't respond to complaints about the decisions or actions of other organisations and government agencies, including those with whom we work.

Complaints fall into two main categories: sensitive and non-sensitive, and are dealt with according to their categorisation.

Non-sensitive complaints include:

- Beneficiary selection criteria[9]
- Quality and/or quantity of assistance/services provided by Concern or its partners
- Lack of adequate information
- Inefficient service delivery mechanisms
- Level of partner and/or Concern presence in the community
- Decision making processes in the community

Sensitive complaints include:

- Allegations of fraud and corruption i.e. breach of Concern's Anti-Fraud Policy
- Harassment, exploitation or abuse or any gross misconduct or malpractice of Concern or partner staff or any individual associated with Concern's programmes as per Concern's P4 and C3
- Issues related to any type of abuse of power by Concern or partner staff or any individual associated with Concern's programmes
- Breach of confidentiality
- Discrimination
- Political interference in our programmes
- A credible security risk to the organisation, Concern or its partners' staff or assets
- A real or potential threat to the wellbeing of beneficiaries
- Any actions which are considered a criminal matter in Sudan or the country of nationality of the alleged perpetrator

Those leading the establishment and functioning of a CRM must remain cognisant of the ongoing security and confidentiality implications of a CRM. For those lodging complaints, this includes:

- Are they safe when physically travelling to make a complaint?
- Could lodging a complaint jeopardise their relationship with their community and its leadership?

For Concern and partner staff:

- Community sensitisation and responding to complaints will necessitate their increased visibility in the community.
- Information contained in a complaint must be protected and handled in a secure and sensitive manner.

A complaint can be made by:

- beneficiaries of programmes delivered by Concern or its partners
- non-beneficiaries within the area where Concern or its partner work
- Concern or its partners' staff[10]

---

[9] In the context of Mornei, this has the potential to develop a security dimension and may become a sensitive complaint.

[10] The CRM has limited capacity in responding to complaints lodged by Concern or partner staff which relate to the decisions and action of Concern management and staff should be encouraged to pursue such complaints using the existing line management/reporting system and grievances policy.

- other stakeholders affected by Concern's work, including local leaders, government representatives and representatives of other organisations

A **complaint does not have to be made by the alleged victim of a given situation.** Good practice suggests that we must accept complaints from a third party on behalf of another person if we can verify that he/she is genuinely acting on behalf of the originator of the complaint. In some cases, particularly those of a sensitive nature, the alleged victim may not feel safe complaining directly or may not want to provide testimony for fear of further abuse or harm. In handling such cases, Concern Senior Management at West Darfur and Khartoum level must be routinely briefed on the information available and will assume ultimate decision making authority. Handling of such cases will be informed by the wishes of the alleged victim, the risks to the organisation and the people involved in the case, local and national legal provisions and the ability to reach a conclusion based on the available evidence.

Complaints which are sensitive in content are handled at the discretion of Concern and guided by the following:

- Communities are aware that Concern is committed to handling complaints without discrimination or victimisation of complainants.
- Concern can't commit to issuing a response to complaints lodged anonymously as the identity of the complainant is unknown. Without sufficient details about the complaint it will prove difficult for Concern management to effectively respond.
- Sensitive complaints will not be reviewed by Mornei CRM Group but will instead be referred to the West Darfur or Sudan CRM Group in order to ensure a transparent and impartial response is issued.
- Concern will evaluate the seriousness of the issues raised in a sensitive complaint, examine the credibility of the allegations and the supporting facts and determine the likelihood of confirming the allegation from attributable sources in order to deliver a transparent and impartial response

If a complaint is found to be untrue following an investigation, Concern guarantees that no action will be taken against the complainant and Concern will not victimise the person who made the complaint. **It should be noted that just because a complaint is found to be unsubstantiated or untrue, this does not mean that the complaint was made maliciously.** If, however, investigation findings conclude that an allegation or complaint made by a Concern staff was made maliciously or in bad faith, disciplinary action will be considered[11]. In the event of a partner staff lodging a malicious complaint, Concern will encourage the partner to initiated disciplinary action.

While no complaint should be ignored and we should treat everyone who makes a complaint with courtesy and respect, Concern expects complainants to raise their complaints fairly and appropriately. In cases where **complainants harass Concern staff, behave abusively or unreasonably pursue a complaint,** Concern reserves the right to withdraw or modify its CRM.

1.4   Principles Governing a CRM

Safety, confidentiality, transparency and accessibility are the four key principles governing the establishment and management of a CRM[12].

---

[11] Concern Worldwide (2010), *'Programme Participant Protection Policy and Staff Code of Conduct'*, Concern Worldwide: Dublin

[12] More detailed information on the application of these principles in relation to fraud and protection of programme participants can be found in Concern Worldwide (2011), *'Anti-Fraud Policy'*, Concern Worldwide:

1.4.1 Safety

Concern must recognise that complaints about sensitive issues can put people in danger, often deterring them from lodging such complaints. A safe CRM must consider potential risks and threats for all those involved in the complaint, including Concern and partners' staff, and should include measures to prevent harm such as: ensuring confidentiality, offering physical protection if necessary and where possible and addressing the possibility of retaliation against those wishing to raise a concern or stand in witness. It is essential that Concern works to prevent retaliation and victimisation for potential users of the CRM. The act of lodging a complaint can also place the complainant at risk and this must be addressed by ensuring complaint channels are appropriate and risk mitigating. The above risks and threats should be identified and addressed during community and stakeholder consultations[13] and the findings used to inform the design and delivery of the CRM.

1.4.2 Confidentiality

Concern understands confidentiality as a principle that restricts access to and dissemination of information. The maintenance of confidentiality within a CRM will help to create an environment in which people are more likely to lodge complaints or stand in witness to improper practice or incidents of exploitation or abuse. Ultimately, people will be reluctant to lodge complaints or provide testament should they fear reprisal for such actions. In practice, this means that **information related to a complaint is shared on a strict need to know basis, with a limited number of specified people for the purpose of taking action.** While restrictions in information sharing must be established and respected, information flows are required in order for a CRM to function. The procedures to ensure confidentiality are outlined later in this paper.

A confidential mechanism for lodging complaints must be available to beneficiaries irrespective of their sex, age, physical ability, language, level of literacy, ethnicity or any background characteristic or factor that may prevent or discourage them from making a complaint safely.

1.4.3 Transparency

Having a transparent CRM will allow beneficiaries and other potentials users to ensure that the procedures in handling complaints are adhered to and ultimately will encourage people to use the CRM. A transparent CRM begins with the active participation of the community and stakeholders in its design. This includes the delivery of consistent, thorough and repeated sensitisations on the CRM. Essentially, beneficiaries and other relevant stakeholders should know:

- the purpose and the limitations of the CRM
- what constitutes a complaint
- who can raise a complaint
- methods for raising complaints
- what happens after a complaint is made
- who is responsible for handling the complaint and communicating the response
- timeframe for receipt of a response
- what action they can take if dissatisfied with the response to their complaint (appeal process)
- what steps Concern will take to ensure confidentiality

Dublin and Concern Worldwide (2010), *'Programme Participant Protection Policy and Staff Code of Conduct'*, Concern Worldwide: Dublin, respectively. These documents should be consulted when receiving and responding to a complaint which falls within their remit.

[13] Consultations should not be limited to the civilian population but also inclusive of humanitarian actors and local government authorities.

1.4.4 Accessibility

A CRM must be accessible for as many people as possible, from as many groups as possible, in all the locations where Concern works. This is achieved through the designing of the mechanism together with the community and stakeholders. They must be empowered to decide the most appropriate channels through which complaints can be raised. This includes a CRM which captures programme activities delivered in partnership.

A CRM has to be developed together with its potential users. The most appropriate mechanism for each situation must be agreed with the community and stakeholders. Gender roles and equality must be taken into consideration for the mechanism to be accessible to all.
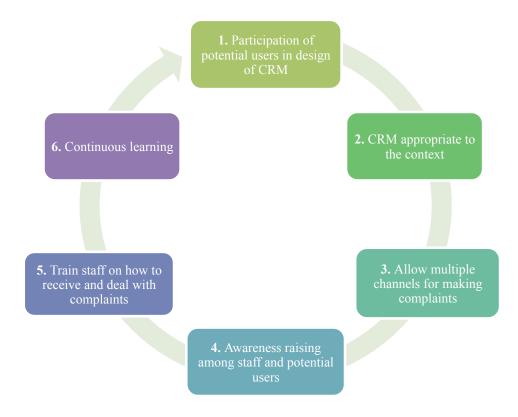
Ultimately, **the CRM must work for the potential users, not for Concern.**

The following questions can be used to evaluate a CRM's accessibility:

- How will beneficiaries/partners in remote locations be able to make complaints? Distance, travel costs?
- How will illiterate people have access to the mechanism?
- Can complaints be made verbally?
- Is it possible to make a complaint on behalf of somebody else (due to illiteracy, fear of retaliation, inability to travel, etc)?
- How will the most vulnerable and the marginalised within the community be informed about the CRM and access it (consider age, sex, religion, disability, etc.)?
- Is the mechanism physically accessible to all?
- Is the mechanism sensitive to traditional cultural norms?
- How much does it cost for a community member to make a complaint (cost of a phone call, transport cost, cost of time spent way from other duties)?
- Does Concern offer support to complainants (transport, finance etc.)?

For the CRM to be accessible to as many people as possible it must be communicated, in an appropriate way, to all potential users.

1.5 Key Aspects of a CRM

1.5.1 Participation of potential users in designing the CRM

A CRM will only be used if its potential users are actively involved in designing and developing it. Participation, not only consultation, of community members and other stakeholders in setting up the CRM is extremely important to ensure their buy-in from the beginning. **A community will feel comfortable using a CRM if they have a sense of ownership towards it and this can only be obtained by actively engaging them in its design.** Ultimately, those who are expected to use the CRM are the best placed to tell Concern what are the most appropriate methods to complain or express dissatisfaction in their context.

1.5.2 CRM appropriate to the context

In order for a CRM to be effective it has to be developed, implemented and communicated in a manner which is appropriate to the specific context where it is intended to operate. The name of the CRM, the channels for lodging complaints and the procedures for handling and responding to complaints must be appropriate to the local context, local legislation and fit within the specific nature of the programme. This can only be achieved if the mechanism is designed in a participatory way with its potential users.

Ensuring the CRM is appropriate to the local context will begin by mapping existing formal and informal complaint and dispute resolution mechanisms in the community such as reporting concerns or abuses with community leaders, law enforcement agents and religious leaders. As much as possible, and if appropriate, **the CRM should be integrated or mirror existing complaint structures and must be accepted and respected by its potential users.**

1.5.3 Allow multiple channels for making complaints

Best practice shows that it is advantageous to provide multiple channels or entry points for people to lodge complaints. The goal is to make the CRM safe, simple and easy for people to use. Multiple

channels should take into consideration the specific needs of the community including age, literacy level, gender, ethnic and tribal diversity, social standing and disability. The following provide examples of CRM channels but these must be evaluated based on the outcome of community and stakeholder consultations and their appropriateness to the context:

- Visibility in the community will enable complainants to easily report a complaint to Concern or partner staff
- Focal persons which have been identified by the community to receive complaints (this can include Concern and partner staff or community members)
- A beneficiaries' complaints committee similar to existing complaint mechanisms and which collects complaints on behalf of Concern and its partners
- Existing community structures which deal with complaints and resolve disputes such as sheik committees etc. and can be sensitised on sharing complaints with Concern
- Help desks to receive complaints during registrations and distributions
- Secure complaints boxes which provide an appropriate channel for sensitive complaints[14]
- Postal address for the receipt of complaints
- A CRM phone number which can be contacted when wishing to lodge a complaint
- Lodging a complaint in Concern or its partners' office
- Access to dictaphones (voice recorders) through focal persons in the community to enable illiterate community members to lodge complaints[15].

Community members and beneficiaries must suggest and decide what channels are most appropriate for them. The mechanism should also enable adolescents and children to complain if necessary. It is important to consider building channels into existing community structures such as youth groups, health groups, community volunteers, school clubs and beneficiary selection committees.

1.5.4   Awareness raising of Concern and partners' staff and potential users

Information sharing related to the CRM has two components;

- Creation of a clear understanding of Concern's operations including the work of our partners
- Sensitising potential users on the functioning of Concern's CRM

The first component should be achieved in line with HAP Benchmark 3 (see Annex 2). In achieving the second component Concern will need to sensitise all staff, including partner staff, in the objectives, scope and functioning of the CRM. While sensitisation must include all staff, additional focus will be given to staff which are likely to actively engage with the CRM, including members of various CRM Groups, Assistant Area Coordinator- Mornei, Sector Officers/Supervisors. Once an appropriate level of staff knowledge has been imparted, attention should then be given to disseminating this knowledge among potential users of the CRM, particularly beneficiaries. This will begin by creating awareness among potential users as to channels available to complain about the actions or decisions of Concern and its partners. Concern and its partners should develop and implement an information strategy to ensure communities understand Concern's accountability commitments[16].

---

[14] Annex 3 provides further information on establishing a complaint box.

[15] This was adopted by Concern in Nepal and while it provides access for illiterate people it proved limiting in the case of sensitive complaints as the recording needed to firstly be provided to the focal person and then Concern, with increased the potential for the disclosure of the identity of the complainant.

[16] A checklist is currently being developed by the Field Coordinator and aims to establish a minimal threshold of information about Concern, its actions and decisions that is shared with stakeholders including the host government, beneficiaries and other humanitarian actors and the information strategy must align with this checklist. See Annex 3 for further details on the information which should be shared with communities.

Information on Concern's operations and the CRM must be disseminated in a language which can be understood by those targeted. Measures should also be established to ensure people with a disability including visually and hearing impaired and with varying literacy levels have access to this information. Various communication methods should be employed to ensure the widest possible audience is reached including meetings with communities, community notice boards, posters in programme sites, information on the back of distribution/registration cards, radio broadcasts and in Concern and partners' offices. In communicating the necessary information the following should be considered:

- **Audience:** what is the gender, age, physical ability, language, level of literacy, ethnicity
- **Available communication tools:** poster, dramas, focus group discussions, community groups, etc.
- **Budget:** how can we reach the widest cross-section of the community within budgetary constraints?
- **Core message/s you want to transmit:** what do potential users really need to know?

The CRM can provide an authentic quality check on Concern's work. However, if the CRM becomes overburdening, this may not necessarily mean that Concern's programmes are of poor quality but could also be a result of poor community consultation and sensitisation of potential users. Insufficient, inconsistent or inappropriate information provided to communities on the CRM could result in a large volume of complaints being received due to a poor understanding as to the purpose and scope of the CRM among its users. This is symptomatic of a failure to meaningfully engage the potential users of a CRM in its design and sensitisation on its purpose and scope. Additionally, the CRM may become overburdened due to the community using the CRM as the only opportunity which they have to express their views. **In order to manage the expectations that all wrongs will be addressed by the CRM, resulting in frustration among staff and communities, Concern must work closely with communities, addressing them in small groups and consistently explaining the purpose and scope of the CRM, including why some complaints can be addressed and others cannot.**

Involving partners in the design and delivery of the CRM, regardless of capacity constraints, is crucial and all future Partnership Agreements and Memorandums of Understanding should make reference to Concern's P4, C3, CRM and other humanitarian accountability measures.

1.5.5   Staff trained on how to receive and deal with complaints

All Concern and partner staff must be sensitised on the purpose and scope of the CRM, with particular attention given to those who are likely or appointed to receive, handle and respond to complaints. Training should include detailed orientation on the handling procedures in place and the importance of remaining sensitive and non-judgemental towards complainants. The Assistance Area Coordinator, Assistance Country Director and Country Director are responsible for ensuring complaints are responded to in a timely manner (when received by their respective CRM Groups) and the necessary programmatic and/or organisational changes are made based on the content of complaints. More detailed information on complaint handing will be provided in the following section.

1.5.6   Continuous learning

Learning from the CRM will principally be captured by the CRM database. Annual evaluations of the CRM will be conducted. These evaluations will comprise of user surveys, focus group discussions and database analysis; concluding with recommendations detailing the effectiveness of the CRM and procedural and practice modifications to strengthen the CRM and programme quality. Learning from the CRM will assist in:

1. Improving the impact of the CRM for potential users and communities

2. Ensuring complaints translate into appropriate modifications in future programme design and delivery.

The relationship between complaints and future programming will be assessed through random selection of complaints for reference against current programming standards and approaches, aimed at assessing the effective transfer of learning from the CRM, where appropriate.

Section 2: Mornei Pilot CRM

2.1 Responsibility for Mornei CRM

The establishment of the pilot CRM in Mornei; including its design, implementation and monitoring, will be managed on a day to day basis by the Assistant Area Coordinator- Mornei and Community Services Officer. The Assistant Country Director, Field Coordinator and Systems Manager in Geneina will be responsible for ensuring adequate training is provided for all staff (Concern and its partners), resources are mobilised and ongoing technical support is available to the team in Mornei. The

Assistant Area Coordinator- Mornei, Assistant Country Director- West Darfur and Country Director will appoint and chair a CRM Groups at their respective levels. Technical assistance in the design and delivery of a monitoring system for the CRM will be provided by the Programme Monitoring and Evaluation Advisor in Khartoum. More detailed information on levels of responsibility in the handling of complaints will be outlined later in this paper.

2.2   Establishing a CRM

Establishing the pilot CRM must be viewed as a continual process rather than a stand-alone task. In achieving one step, Concern can't neglect to revisit that step in the future to ensure it remains effective, confidential, safe and transparent. The following are the six steps which will be followed throughout the delivery of the pilot CRM in Mornei:

2.2.1   Develop a CRM Paper

This document serves to guide the piloting of the CRM in Mornei; from design and delivery to monitoring and learning. The document outlines the rationale and objectives of the CRM and seeks to ensure that the necessary resources are mobilised to enable a transparent and effective CRM to be piloted in Mornei. A draft of this paper has been prepared by the Programme Support Officer- Sudan and circulated to key programme and systems staff in El Geneina and Khartoum for review. Once a technical review has been completed, a period of field level consultations, involving the community and other stakeholders, will be conducted by Concern and partner staff in Mornei and a final paper approved by the Assistant Country Director- West Darfur. The provisions of the paper will then be disseminated in Mornei by the Assistant Area Coordinator- Mornei, with support from the Field Coordinator. Following an evaluation of the pilot CRM, a CRM Policy will be developed to enable replication across Concern's programme areas. This policy will be reviewed following the annual evaluation of the CRM.

2.2.2   Community Consultation[17]

The delivery of an effective, confidential, safe and transparent CRM begins with community consultations including meetings and focus group discussions. The involvement of the community aims to identify the most appropriate mechanisms through which they can lodge a complaint. For example, a group of community leaders may identify a mobile telephone number as an appropriate means of lodging a complaint whereas a women's group may reject this mechanism as less that 10% of them own a mobile phone and 60% would not feel comfortable borrowing a neighbour or relatives phone for this purpose (perhaps they fear that Concern may call the number used at a later date and disclose the details of their complaint). The CRM will be most effective if it builds upon existing complaint mechanisms. This should be the starting point for community consultation, **'If you have a grievance/complaint, what do you currently do in order to have that grievance/complaint addressed?'** While it may be necessary to introduce new channels to lodge complaints so that appropriateness, confidentiality, safety and transparency are ensured, these should build upon existing

---

[17] Stakeholders include humanitarian actors and local government authorities in Mornei.

channels rather than creating a new complaint mechanism. Other stakeholders such as HAC, line ministries and other organisations programming in Mornei should also be included in the consultation process through focus group discussions.

It is crucial that this process gathers the perspectives of a cross section of the community including people affected by a disability, elderly, single parent headed households, orphan headed households, large families, farmers, labourers, mothers, fathers, educators, religious leaders, youths and marginalised groups including ethnic minorities. While this process will be time consuming, if done correctly the CRM will not only be appropriate to the community and thus easier to manage, but it will act as a source of pride for the community and potentially increase their engagement with Concern's programmes. Additionally, it will capture complaints which Concern is in a position to respond to rather than those outside Concern's control. These consultations will also represent an opportunity to determine the language used for the CRM such as 'suggestion mechanism', 'information mechanism', 'feedback mechanism' or 'comments mechanism', based on their interpretation when translated to Arabic. Ultimately, the language must be appropriate to the community and while it may change, the CRM will remain as a mechanism through which complaints are received and a response provided.
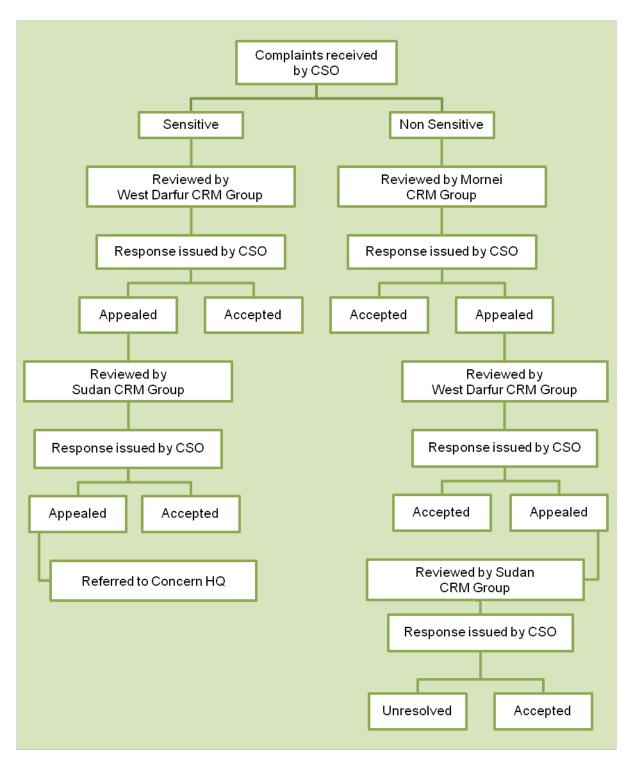
2.2.3   Staff Training

Upon deciding on the channels to be used in the CRM, all Concern and partner staff must be trained in the purpose, scope and functioning of the CRM. Further training should be tailored to match the staff member's likely engagement with the CRM. For example front line staff such as community volunteers will need to be trained in receiving complaints in a sensitive and non-judgemental manner and on how such complaints are relayed to Concern, while Concern staff in Mornei will need to be trained in the handling procedures outlined in this document. Staff training in Mornei is the responsibility of the Assistant Area Coordinator- Mornei, with support from the Field Coordinator. Training of the West Darfur and Sudan CRM Groups is the responsibility of the Assistant Country Director- West Darfur and Country Director, respectively.

2.2.4   Community Sensitisation

While hardware (physical) components such as complaint boxes and billboards represent the visibility side of the CRM, they must be preceded by repeated community sensitisation efforts (as outlined earlier). The mechanisms used to communicate and deliver the CRM such as billboards, notice boards, a CRM mobile phone, a weekly CRM clinic in Concern's office or a complaint box in each Concern facility (nutrition centres, animal health committee centres and field office) will not be effective unless the community is sensitised on the purpose and scope of the CRM. Sharing such information should be outlined in a brief information strategy paper, which aligns with Concern's Benchmark 3 checklist. The strategy will outline what channels are used to disseminate the purpose and scope of the CRM and how dissemination efforts will be measured to ensure key messages are understood by the community and other stakeholders.

2.2.5   Receiving and Responding

Complaints received by CSO

Sensitive — Non Sensitive

Sensitive branch:
- Reviewed by West Darfur CRM Group
- Response issued by CSO
  - Appealed
  - Accepted
- Reviewed by Sudan CRM Group
- Response issued by CSO
  - Appealed
  - Accepted
- Referred to Concern HQ

Non Sensitive branch:
- Reviewed by Mornei CRM Group
- Response issued by CSO
  - Accepted
  - Appealed
- Reviewed by West Darfur CRM Group
- Response issued by CSO
  - Accepted
  - Appealed
- Reviewed by Sudan CRM Group
- Response issued by CSO
  - Unresolved
  - Accepted

The figure above outlines the principle handing procedures for a complaint. The formation of Mornei, West Darfur and Sudan CRM Groups will be led by the Assistant Area Coordinator- Mornei- Mornei, Assistant Country Director- West Darfur and Country Director. These groups should comprise of a representative from Senior Management, Programmes and Systems and will meet weekly, fortnightly and monthly, respectively. Efforts should be made to ensure a gender balance in each of these groups. Once a complaint has been received, it is shared with and recorded by the Community Services Officer in Mornei. Each complaint, regardless of its method of communication, such as to a Concern staff member during a field visit or through a complaint box, must be detailed in a complaint form, including those lodged anonymously and lacking in content (limited information as to the complainant's personal details or nature of the complaint).

Complaints are then reviewed by the Community Services Officer and categorised into valid and invalid, sensitive and non sensitive, as outlined earlier. Sensitive complaints will be referred directly to West Darfur CRM Group, to ensure a transparent and impartial response can be provided. The Community Services Officer will then share the complaint with the relevant CRM Group, as well as entering the complaint into the CRM database, minus the personal details of the complainant. The Assistant Area Coordinator- Mornei may delegate the Community Service Officer's role in handling complaints should he be out of the duty station. Concern will strive to ensure complaints are resolved in a timely manner, with 80% responded to within two weeks and no more than 10% of complaints remaining unresolved in any one year.

It is imperative that all the Community Services Officer removes all personal details prior to referring a complaint to any CRM Group. This measure will also mitigate against personal bias or personal or professional relationships informing deliberations. Disclosure of the complainant's details will only be permitted at the request of the Assistant Country Director- West Darfur or Country Director. Electronic records and all supporting documents, including the CRM database, must be held on a desktop computer[18]. The desktop and file must be password protected and the folder containing hard copies of complaints and all supporting documents must be locked in a secure storage unit when not in use. The original copy of a complaint must be held by Concern at all times and electronic reproduction of a complaint form and all supporting documents is prohibited as this constitutes a potential violation of Concern's commitment to a safe and confidential CRM. Referral of a complaint between CRM Groups must only be communicated by email and directed only to the members of that CRM Group. These procedures aim to ensure the protection and security to the complainant. It is important that potential users are made aware of these procedures during community sensitisation on the CRM and also when lodging a complaint.

2.2.6   Monitoring and Evaluation

The establishment of a monitoring system for a CRM has two principle outcomes:

> • It enables the tracking of complaints and their responses in a systematic way to ensure accountability to beneficiaries and compliance with donor commitments[19].
> • It provides Concern with a valuable insight and potential learning as to the experiences of the community due to Concern's decisions and actions.

Monitoring of the CRM has two inputs; a complaint form (see Annex 4) and a CRM database (see Annex 5). Each complaint form contains a unique reference code which corresponds with the CRM database. The form is completed by the Community Services Officer for all complaints received and a receipt issued, where possible. The second component involves the entry of each complaint form by the Community Services Officer into the CRM database. This will enable complaints to be monitored in a systematic manner and trends and challenges indentified. The database outlines the nature of the complaint, preliminary deliberations on its resolution and the final status of the complaint (resolved within a timeline or unresolved).

The pilot CRM will be evaluated in early 2012 by Concern's Programme Monitoring and Evaluation Advisor. The evaluation will include user surveys, focus group discussions and database analysis, concluding with recommendations detailing the effectiveness of the pilot CRM and procedural and practice modifications to strengthen the CRM. The evaluation will identity next steps to increase the coverage of the CRM to Concern's other programme areas in Sudan.

---

[18] Such records should not be stored on a laptop computer due to the risk of theft.
[19] ECHO 2011-2012, Result 3, Indicator 1, commits to, '80% of complaints received are responded to within two weeks'.

Concern Worldwide
Paper on Establishing a Pilot CRM in Mornei, West Darfur

2.3 Work Plan

2.3.1 Consultation Process

In April, 2011, the Assistant Area Coordinator- Mornei- Mornei, Systems Manager- West Darfur and Assistant Country Director- South Kordofan attended a four day CRM workshop, facilitated by the Humanitarian Accountability Partnership- International, in Nairobi, Kenya. In July, 2011, the three participants, conducted a replica CRM workshop in Sudan, based on their learning from the Nairobi workshop. These workshops aimed to ensure sufficient capacity is available within the Sudan programme and systems team to design and deliver a CRM across our programme areas.

As stated earlier, community participation in the design of a CRM is central to ensuring safe, accessible, transparent and confidential channels are available to potential users of the CRM. Prior to conducting community consultations, the Assistant Area Coordinator- Mornei- Mornei, delivered a one day training to programme and systems staff in Mornei. The training served as an initial sensitisation as to the purpose and scope of a CRM. Efforts were made to ensure only introductory information was provided, as presenting a comprehensive training may have resulting in staff bias when conducting community consultations. The staff expressed concern regarding the potential overburdening of a CRM with complaints about other organisations, complicated further by Concern's role as camp coordinator in Mornei. They added that such a mechanism could serve to damage Concern's reputation with the community, including potential security risks to the organisation, its staff and assets, if not clearly understood and accepted by the community.

Having completed the introductory CRM training, Concern's staff in Mornei conducted a total of 18 community consultations in August, 2011, gathering the experiences and opinions of a cross section of the community in Mornei and Rongataz. The consultations involved Concern beneficiaries and non- beneficiaries, community leaders, community/special interest groups and key humanitarian agencies, including government authorities. The consultations evaluated the community's engagement with existing complaint mechanisms and examined opportunities available to Concern's CRM. There was significant diversity in the community's experience in raising complaints, both in frequency and satisfaction.

2.3.2 Recommendations arising from Consultations

- The following CRM channels should be established: complaint boxes, receipt of complaints by Concern staff and community volunteers and referral of complaints to Concern by Sheiks.
- The initial proposal was to establish eight complaint boxes[20]. However, due to budget constraints this could be revised to six (one in each of Concern's five Community Centres in Mornei and one at the Primary Health Care clinic in Rongataz).
- Concern should integrate Sheiks (community leaders) into its CRM, as the primary existing complaint mechanism used by the community. This will involve complaints received by a Sheik which relate to the decisions or actions of Concern being forwarded by the Sheik to Concern. However, Concern must ensure Sheiks do not influence or suppress complaints by offering several CRM channels to the community and ensuring knowledge and application of the CRM principles by Sheiks.
- The team in Mornei will need to take a decision regarding the appropriate language to be used for the CRM e.g. complaint, suggestion or comment mechanism, as the consultations were inconclusive in this regard.

---

[20] One in each of Concern's five Community Centres in Mornei, one in Concern's Nutrition Centre in Mornei, one in SOHA's mobile Primary Health Care clinic in Rongataz and one outside Concern's office in Mornei.

- Improved information sharing is central to the delivery of an appropriate and effective CRM. Concern's Information Sharing Checklist should be finalised to ensure basic information related to Concern's decisions and actions is shared with communities.
- The complaint handling procedures outlined in the CRM Paper must be understood and adhered to by all Concern staff, community volunteers and Sheiks, particularly those related to non discrimination and ensuring the confidentiality of the complainant.
- Communities must be sensitised as to the purpose, scope and functioning of the CRM, including valid and invalid complaints and complaint handling procedures.
- The fortnightly bilateral meeting involving Concern and the Sheiks should be re-established to assist in timely and confidential complaint handling.
- Complaints involved a significant proportion of the community should be responded to during community meetings as word of mouth represents one of the principle communication methods practiced by the community.
- Complainants will be provided with multiple channels through which they can lodge complaints, with the option of providing or withholding their name. In terms of ensuring a response is issued, anonymous complaints will prove more difficult to provide feedback to, but effective community sensitisation on Concern's commitment to non discrimination and confidentiality in processing complaints, may ameliorate the likelihood of anonymous complaints. Further guidance on handling anonymous complaints is outlined in the CRM Paper (Section 1.3 Scope).
- Complaints should be responded to within two weeks.
- In light of the absence of a formalised CRM among humanitarian agencies in Mornei and Rongataz and given the highly politicised nature of humanitarian assistance in Mornei, Concern has taken the decision not to engage in the referral of complaints related to the decisions or actions of another organisation. Instead, the complainant will be advised to direct their complaint to the relevant organisation.
- All sensitive complaints are to be handled by the West Darfur CRM Group to ensure maximum safety and confidentiality is extended to complainants.

2.3.3   Next Steps

Task	Responsible	Deadline
Procurement of complaint boxes	Nazar and Logistics Department in El Geneina	
Training for all Concern staff, community volunteers and Sheiks on CRM (purpose, scope and complaint handling procedures)	Nazar and Tijani	
Installation of complaint boxes	Nazar and Tijani	

Annex 1   HAP 2010 Standard- Benchmark 5, Handling Complaints

HAP 2010 Standard **5. Handling Complaints**

The organisation enables the people it aims to assist and other stakeholders to raise complaints and receive a response through an effective, accessible and safe process.

Requirements	Means of Verification
5.1 The organisation shall define and document a complaints procedure, covering: 1. the people it aims to assist, staff and other stakeholders who have the right to raise a complaint and receive a response; 2. the purpose and limitations of the procedure; 3. how complaints can be raised; 4. the steps taken to deal with the complaints, the procedure for investigating them and the response time frame; 5. the process for fast-tracking allegations of exploitation and abuse, including those of a sexual nature; 6. confidentiality, non-retaliation, appeal options and support for people who complain and any witnesses; and 7. the process for safely referring to a third party people who complain if the complaint is about issues the organisation cannot handle, such as medical attention and psychological, social or legal support.	**1.** The complaints procedure
5.2 The organisation shall identify and put in place complaints procedures that are based on the preferences of the people it aims to assist, staff and other stakeholders, after consulting them.	**1.** Records of, and interviews with staff and with crisis-affected women, men, boys and girls about, a consultation process on the complaints procedure and the appropriate term to refer to it
	2. Examples and records that consultations guided the development of the complaints procedure
5.3 The organisation shall ensure that the people it aims to assist, staff and other stakeholders understand the complaints procedure.	**1.** Records of, and interviews with staff about, a process to confirm that the target audiences understand the complaints procedure
	2. Observation and interviews with staff and with crisis-affected women, men, boys and girls to confirm that they understand the complaints procedure
5.4 The organisation shall ensure that it handles complaints in line with its procedure and that it acts upon complaints.	**1.** Records and interviews to confirm that the complaints procedure is followed, referring specifically to responses and timescales
	2. A sample of current complaints and those which have been settled
	3. Interviews with staff, people the organisation aims to assist, and other stakeholders

	4. Examples of action taken as a result of complaints
5.5 The organisation shall work with its partners to agree on how they will raise and handle complaints against each other in a safe and accessible way, and to put this agreement into practice.	1. Interviews with staff of both the organisation and its partners about, and records, such as minutes from meetings, of a joint decision-making process
	2. Documents on how the organisation and its partners will handle complaints
	3. Observation, records, and interviews with staff to confirm that both the organisation and its partners follow the agreed complaints procedure
5.6 The organisation shall work with its partners to agree on ways in which they will enable the people they aim to assist to raise complaints with the partners, including when partners will refer the complaint to the organisation, and to put this agreement into practice.	1. Documents, such as a complaints procedure, on how the partner will handle complaints
	2. Observation, records, and interviews to confirm that complaints are handled as agreed
5.7 The organisation shall work with its partners to improve how partners meet requirements 5.1 to 5.4	1. Interviews with staff about, and records (such as work plans and reports) of, activities to improve partners' practice
	2. Examples of improvements

Annex 2   HAP 2010 Standard- Benchmark 3, Sharing Information

HAP 2010 Standard	
3. Sharing information	
The organisation ensures that the people it aims to assist and other stakeholders have access to timely, relevant and clear information about the organisation and its activities.	
Requirements	**Means of Verification**

3.1 The organisation shall define and document processes for sharing information, covering:
  1. commitment to accurate and timely information sharing;
  2. what information it will share with the people it seeks to assist and other stakeholders;
  3. how decisions will be made on when and how to share information; and
  4. criteria used for deciding not to share information.
	1. Documents on processes for sharing information, such as a corporate statement and staff guidelines

3.2 The organisation shall share with the people it aims to assist and other stakeholders information appropriate to their needs, including:
  1. its background and contact details;
  2. its accountability framework, staff code of conduct and complaints procedure;
	1. Records of, and interviews with staff and crisis-affected women, men, boys and girls about, a process for developing a context-specific information plan
	2. Observation and interviews with staff and with crisis-affected women, men, boys and girls to

3. its goals and project objectives, expected results with the time frame, and a financial summary, as well as summaries of evaluations and progress reports; 4. staff roles and responsibilities; 5. criteria for selecting target groups and deliverables as agreed in requirement 4.2; and 6. how input from participation activities has contributed to decisions.	confirm that information is shared Examples of media and records of information sharing activities
3.3 The organisation shall ensure that information specified in requirement 3.2 is presented in languages, formats and media that are appropriate for, accessible to, and can be understood by the people it aims to assist and other stakeholders.	**1.** Observation, records, and interviews to confirm a process for deciding appropriate and accessible languages, formats and media **2.** Interviews with people the organisation aims to assist and other stakeholders
3.4 The organisation shall ensure that its staff identify themselves to people they aim to assist and other stakeholders.	**1.** Observation, records, and interviews to confirm how staff identify themselves, including through identity cards with validity dates, organisation name and contact details **2.** Interviews with people the organisation aims to assist and other stakeholders
3.5 In agreement with its partners, the organisation shall make public the names of its partners, the main joint activities, and a financial summary of the programmes it funds.	**1.** Interviews with staff of both the organisation and its partners, and records, such as minutes from meetings, of a joint decision-making process **2.** Examples and records of information sharing activities
3.6 The organisation shall work with its partners to agree on how and when they will share information, including with the people they aim to assist, and to put this agreement into practice.	**1.** A plan on what information partners will share **2.** Examples and records of information sharing activities, and interviews with affected women, men, boys and girls and with partner staff
3.7 The organisation shall work with its partners to improve how partners meet requirements 3.1 to 3.4.	**1.** Interviews with staff about, and records (such as work plans and reports) of, activities to improve partners' practice **2.** Examples of improvements

Annex 3   Information Sharing

The following is the minimal required information which Concern must should shared with communities:

- all necessary information about who Concern and the partner organisation are, what we do, our programmes in the area, etc.
- that delivered goods and services are their entitlement- based on established and disseminated beneficiary selection criteria- and do not require payment of any kind (with the exception of cost recovery components, all of which need to be clearly explained),
- about beneficiary selection criteria- who is entitled to receive support and on what basis
- of the items that they are entitled to receive- quantity and variety of items/services they should receive; how and when the distribution is taking place
- that Concern and partners' staff have a duty to deliver assistance without discrimination

- that goods and services cannot be withheld or withdrawn on the arbitrary decision of one or more Concern or partner staff
- that it is unacceptable for Concern and partner staff to solicit or accept bribes, rewards, gifts, favours- including sexual favours- from beneficiaries
- of the standards of behaviour expected of all Concern and partner staff
- of their right to complain if they are not satisfied with the way in which the programme is implemented or the way Concern and partners' staff or any individual associated with Concern interact with them
- how they might make such complaints

Annex 4   Complaint Boxes

Complaint boxes are one way of receiving complaints in a more confidential manner. If using complaints boxes, they must be placed in locations which are accessible and known by the community including Concern's buildings, distribution sites and communal areas such as markets, playing fields and public buildings. However, complaint boxes may represent a 'Western' imposition, and while they offer an appropriate channel to lodge sensitive complaints, they must only be utilised if accepted by the potential users. In addition, other channels will need to be delivered to enable illiterate people to raise a complaint without having to request assistance.

Before using complaint boxes it is recommended to consider the following points:

1. Location? Is the location safe for all? Distance?
1. Who opens it? At least two persons?
2. How often?
3. Who keeps the key of the lock? One lock or two locks with the keys kept by different people?
4. What do you do with the complaints in the box?
5. Who registers the complaints found in the box? Where?
6. Who decides the validity of the complaints? Who decides if the complaints are sensitive or non-sensitive?
7. How do we communicate the acknowledgment of receipt to the complainant?
8. Who deals with the complaints?
9. Who gives a response to the complainant? How?

Information that must to be clearly visible on the boxes in the local language includes:
- Concern's and partner's contact details
- How often the box is open
- Who opens the box
- Concern and ECHO's branding[21]

Annex 5   Complaint Form- attached as a separate document

Annex 6   Complaint Database - attached as a separate document

---

[21] It is at the discretion of Concern whether donor branding is included in CRM visibility measures including complaint boxes, complaint forms and community notices. The decision to exclude donor branding should be based on consistent expressions of concern by potential users as to the role of the donor in complaints handling.

Concern Worldwide
Paper on Establishing a Pilot CRM in Mornei, West Darfur