HOW TO COMPLAIN!

Concern Worldwide Pakistan Programme

Complaints & Response Mechanism for Programme Participants



June 2009

Section.1. Introduction

There are various ways to complain in Concern – both formal and informal. While we would always try to ensure there will be little to complain about, we believe it is a sign of a healthy and open organisation that both those who work for Concern, and those with whom we work, feel free to question how things are being done, or *not* being done

It is ALWAYS important to remember that most 'complaints' will simply be misunderstandings, which will be dealt with, transparently and easily, by the parties involved, having a straightforward discussion on the issue. What we are addressing in this document are the slightly more complex or contentious

issues, and the formal mechanisms for dealing with them.

Background information:

CWW is committed to having effective, accessible, safe & non retaliation complaints and response mechanism; for beneficiaries, partners and its staff members. Concern has a number of *formal* mechanisms available; these can be further sub-divided into external and internal mechanisms.

External is when the complaint involves a party or parties *not* working for Concern, primarily issues affecting programme participants/beneficiaries but it may also cover partner organisations and CWPP staff in case of protection issues or abuse of power. Concern Pakistan has been working on a <u>standard complaints mechanism</u>, with input from beneficiaries and HAP, which will hopefully address issues that beneficiaries may have with Concern's performance - such as a perceived failure to meet our expressed objectives in the field. Since 2004 however, Concern has had a policy which specifically expresses our commitment to tackle any abuse of power, or exploitation, within our programmes, and this is the <u>Programme Participants' Protection Policy or 'P4'</u>. The P4 policy clearly outlines what can be categorised as a P4 complaint. Receiving a P4-type complaint is a very serious issue for the organisation and Concern is committed to deal with such complaints. (See attached copy of P4)

Internal relates to complaints that arise <u>solely</u> within the organisation. The principal internal mechanism is the <u>grievance procedure</u> which primarily deals with hard-to-resolve, work-related issues/disputes.

This document concentrates on the processes and mechanisms Concern and its partner organisations can use to deal with complaints and issues of accountability of an <u>external</u> nature

It is expected that the majority of complaints, which are often minor, can be dealt with at the field level through the **Standard Complaint Mechanism** described in Section 2. However, cases involving serious protection or 'P4' issues will be dealt with through the **P4 Reporting & Investigation Mechanism** outlined in Section 3. A 'flow' diagram of how these two mechanisms relate to each other can be seen in Annex B

Complaints Mechanism Development in RRDP

This complaints and response mechanism has been developed as per HAP 2007 Standard - benchmark five, where the intended beneficiaries are consulted regarding appropriate ways to complain; taking into consideration the need for confidentiality, and ensuring a safe, 'non-retaliatory' referral process

Section 2. Standard Complaint Mechanism

Concern Pakistan's standard complaint mechanism is currently being developed by Concern's Rawalpindi Rural Development Programme (RRDP) team in sub-district Kotli Sattian. This is the one project where a Concern team deals <u>directly</u> with beneficiaries; all other projects are implemented through local partner organisations. Concern will therefore need to work with its partners in the further development and adoption of such a mechanism.

The complaint mechanism is intended to enable programme participants to lodge complaints and provide feedback to Concern (or partners) at the field level; and establish that it is their right to complain.

The programme participants/community with whom we are working can complain about all Concern programme issues (selection criteria, quality of supplies or services), Concern or its partner staff behaviour and conduct, any contractor or supplier or their employee having direct access to community, staff member can complain about their colleagues attitude/conduct with them, community or with other staff or partner staff. Concern CRM may not be able to process complaint against all other I/NGOs or Government departments who are not working on Concern specific projects but will assist the complaint in safe referral to concerned authorities if required. Concern is also not able to process complaints which are under investigation by law enforcing agencies

not able to process complaints which are under investigation by law enforcing agencies or matters under litigations/court trial. However if such investigation/s are completed or court decides then it may process the complaint if required.

Where possible, documents related to the complaint mechanism, including instructions and the actual complaint forms, will be made available in the local language. In cases where the complainant is unable to write, support will be provided by Concern or partner staff or by one of the community members in completing the form and, as they wish, the complainant will be given the opportunity to have the completed form checked, by a literate friend/relative, for accuracy.

All Concern staff and relevant partner organisation staff will be trained appropriately, and a Complaints Management Committee (CMC) will be formed (comprising of at least 3 staff members) to deal with issues requiring investigation. The plan is that CMCs will be formed *as appropriate* in **all** programme areas, in consultation with the respective beneficiaries and partner organizations. At least one member of the CMC will also have P4 responsibilities. All partner organisations will be supported to establish a complaints and response mechanism in Concern project areas; and a separate consultation will be conducted with the beneficiaries in those areas.

2.1 Channels for Lodging a Complaint:

Under the complaint mechanism, complaints can be lodged in the following ways:

- Complaints can be made **in person** by the beneficiary by visiting the Concern office, or during the course of field visits. If the beneficiary is illiterate, the CMC/staff can fill the complaint registration form.
- Concern field office and country office phone numbers will be displayed next to the complaint/suggestion boxes. Depending on the nature of complaint, beneficiaries may choose to contact any office **by telephone**
- Complaints or suggestions can be dropped into a complaint/suggestion box outside the entrance of the Concern field office. Information about Concern's programme and contact details for the Pakistan Country Office in Islamabad will

be displayed next to the complaints/suggestions box in the local language. (There should be a clear understanding that unless the complaint is of a serious nature, or about the field team themselves, any letters/phone calls received by the Country Office will be referred back to the field office in the first instance)

- Complaints/suggestion boxes will be available in each Union Council or Community Organization office; there will be locked boxes in the programme area. Community Organizations will ensure the security of the complaint/suggestion boxes. It was agreed with the beneficiaries that on bimonthly basis, two of the Complaint Management Committee members will open the complaint boxes placed at different locations.
- An agenda point covering issues, complaints and feedback mechanisms, will be added to the agendas of **community meetings**. This will give beneficiaries an opportunity to raise any non-confidential issues and, where possible, receive an instant response/solution. When the issue remains unresolved or the programme participant is dissatisfied, the issue will be dealt with through the formal complaint mechanism process.

2.2 Handling Complaints:

- All complaints will be logged. When a complaint reaches the Concern field office, by whatever means, it will be registered on a Complaint Register (Annex C) by a delegated 'Registrar'. The Registrar (or the staff member receiving the complain in the field directly) is also responsible to brief the person who is lodging the complaint on how their complaint will be dealt with and the estimated timescale required for a response, keeping in mind the safety of the complainant. For information on how to deal with anonymous complaints or complaints involving insufficient information, separate document as Guidelines will be shared.
- After registration of the complaint, the Registrar will refer the complaint to the CMC for further action.
- If there is clearly a P4 issue, the CMC will report it directly to an appropriate manager(s). This could be, the relevant Programme Manager or to the senior management. (Obviously, if the complaint involves either the Registrar or other CMC member, there are by-pass mechanisms in place, offering the complainant the option of directly contacting the Country Office/Head Office).
- In the first instance at least, most formal complaints that need further analysis will be investigated by the Complaint Management Committee (CMC) in the field office. Depending on the nature of the complaint, a community member may be included in the investigation team.
- In case of a serious programme activity related complaint this will be forwarded to the Programme Manager, who will then make recommendation to most senior management.

2.3 Decisions:

After analysis and investigation of the registered complaint, the Complaint Management Committee will make recommendation to Programme Manager who will decide how to handle the issue at the field level. In case of serious programme issue, perhaps involving the CMC, the most senior management will decide how to handle it.

In case of protection (P4) issue, the Country Director/head of the partner organization will form an investigation team comprising appropriate senior management team members. In complex cases, especially those of sexual exploitation and abuse, technical assistance may be requested to satisfactorily and appropriately deal with the

issue. The complainant will have the right to appeal to the decision taken in both above mentioned cases using the routine procedure or the procedure mentioned in the decision letter for confidential issues

2.4 Communication & Redress:

When the complaint is registered, the Registrar will inform the complainant that his or her complaint has been received and is being processed.

Complaints should be addressed <u>within two weeks of registration</u>, though sometimes, depending on the complexity of the complaint, more time may be required. One way or another, the complainant <u>must</u> be kept updated about the status by the relevant manager, and must receive a written response to a formal complaint but confidentiality of the issue should never be compromised. Confidential record keeping will be introduced for complaints with privacy/confidentiality issues).

2.5 Ensuring Complaints Are Addressed:

- The field team will include a 'complaints' point on the agenda of its weekly/monthly team meeting (only non-confidential programme-related issues), ensuring both that there is a response, and that 'learning' is shared. Cases with confidentiality issues will not be discussed. Response/update will be the responsibility of the relevant manager; in most cases this will be the programme manager.
- Likewise with community meetings, Concern/partner staff will make sure that the complaints/issues agenda point is tabled, keeping confidentiality in mind.

2.6 Monitoring & Evaluation:

The Programme Manager (or other senior management) should regularly review the complaint files and should double-check the process when attending Community meetings. Concern will also make sure that the programme monitoring and evaluation process also includes a review of the complaint management system.

Note; this may be complicated due to confidentiality issues, but if possible a mechanism should be developed for regular joint review with the community on the functioning of the complaints system, to further promote transparency & understanding.

Section 3. P4 Reporting & Investigation Mechanism

3.1 Background to the P4 Reporting & Investigation Mechanism

It is important before reading further that everyone familiarizes themselves with the Programme Participants' Protection Policy.

The P4 reporting mechanism has been developed primarily to raise concerns about improper actions or attitudes of people working with, or for Concern, towards beneficiaries. However, as the P4 is about abuse of power, this may be widened to include abuse of partner staff by Concern staff, or abuse of programme participants by partner staff.

Some of the issues covered by P4 are very sensitive; a more specific, reporting mechanism has been developed. Concern/partner organization will nominate P4 contact persons in each project areas and also form a P4 Panel (comprising of senior staff). All these additional channels of reporting P4/protection related complaints are provided so

that complainant can have access to maximum number of channels. The complainant can choose **any** of the channels as s/he feels appropriate, and is comfortable with.

3.2 P4 Contact Persons

The complainant may choose any of the P4 contact persons (comprising of male/female if possible) in the relevant location to report the complaint to, or alternatively they can complain directly to a member of the P4 panel. In fact they can choose **any** staff member to make the initial contact - the most important factor is that the complainant feels comfortable and secure with their point of contact.

3.3 The P4 panel

Ideally, the P4 panel will consist of three members of the country Senior Management both for Concern and partners (if necessary, <u>for gender balance</u>, a non-senior management member may be included on the panel).

Note: a separate memo (document) will be issued for more details about the responsibilities of the P4 Contact Persons and P4 panel characteristics.

CWPP/partners will review and monitor the Complaint Response Mechanism for further improvement and effectiveness of the process during routine programme monitoring and as per feedback; and will incorporate the lessons learnt accordingly.

(Annex C is a sample for beneficiaries brief information)

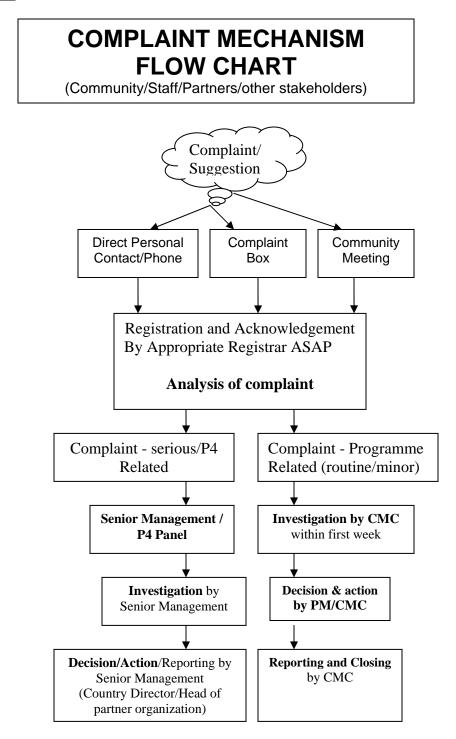
Annex A - Complaint Form Complaint Form

Name of Complainant:			Village:				
Union Council:			Contact Number:				
Received By:			Signature:				
Receiving Date:			Complaint No:				
Method of Receipt:	Complaint box		Village meeting	Personal/Phone			
Description of Complaint:							
Discussed With:			Discussion Date:				
			Discussion Date.				
Signature of Person Consulted							
Decision:							
Communication Type:	Response		Redress	Referral			
Communication Date:			Communicated By:				

Complaint Acknowledgement Receipt

Complaint Received By:		Signature:			
Complaint No:		Receiving Date:			
Contact Details:	Ph:	Timing:			

Annex B



Annex C

Information for ALL Participants in Concern Programmes

Concern's Mission is to help people living in extreme poverty achieve major improvements in their lives which last and spread without ongoing support from Concern. To achieve this, we engage in development and emergency response/rehabilitation activities, either directly or with local partners.

In your area, Concern is working with local partner(s):_____

In Concern, we believe we are accountable to the people we work with, so we want you to know that **should you have issues over the standard of work or behaviour of those working on the project, you are actively encouraged to discuss those issues - <u>you have the right to complain</u>. By asking such questions, you will be highlighting possible areas for the improvement in either Concern's or our partner's work or behaviour, and this could bring benefits to <u>all</u> parties.**

In the first instance, or for less serious matters, we suggest you talk to an appropriate member of the team working in your area, as they are in the best position to address the issue quickly:

NAMES:

Alternatively, you can contact:

NAMES:

The most important thing is that you feel comfortable with the person you are dealing with, and that you get resolution of your issue.

The person you talk to *may* be in a position to clarify, or assist, to your satisfaction immediately, or, if you wish, they can help you register a formal complaint, and they can also explain the procedure in terms of confidentiality, investigation process, and when you can expect a response.

We look forward to working with you to achieve the best results for all concerned

Best wishes from the Concern team