



# BAREFOOT INITIATIVE

## COMPLAINTS & RESPONSE MECHANISM POLICY

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<b>Responsible person:</b> Co-Managing Director	<b>Scheduled review date:</b> June 2022
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## OUTLINE

1. Purpose
2. Scope
3. Definitions
4. Policy in practice
5. Monitoring and review
6. Related policies and procedures

## 1. PURPOSE

Barefoot Initiative is committed to principled, accountable and high-quality Community development action. In order to achieve greater accountability, it is important to establish mechanisms that allow the people and communities served by our programmes as well as our partner organisations and other stakeholders to give feedback to Barefoot Initiative and raise complaints and concerns regarding the performance of the organization.

As an organisation we welcome complaints because we recognize the right of people to express their concerns and we also appreciate the value of complaints for continuous learning and improvement. It is also part of the duty of care to our personnel and partners to establish clear mechanisms for the investigation and response to complaints.

## 2. SCOPE

This policy is directed at Barefoot Initiative personnel, volunteers and partners and gives guidance on how to establish a complaints and response mechanism within our projects.

### Who Can Make a Complaint

- Beneficiary of a project implemented by Barefoot Initiative or its partners
- Representative of Barefoot Initiative or partner organisation
- Individual staff and/or volunteer of Barefoot Initiative or partner organisation
- Affected community members who are not beneficiaries of our projects
- Other stakeholders affected by the implementation of a Barefoot Initiative project (e.g. local leaders, local government representatives, etc.)

## 3. DEFINITIONS

### Complaint

A complaint is an expression of dissatisfaction related directly to the delivery of services, actions or behaviour of anyone involved in implementing Barefoot Initiative projects, being it staff, volunteers or partners. It is a specific grievance that expects a response.

### Complaints and Response Mechanism

A Complaints and Response Mechanism (CRM) is a set of simple and transparent procedures that provide its users with access to safe and confidential means of expressing complaints and give guidance to staff about how to handle complaints to the point of giving a response to the complainant.

### Guiding Principles for the Establishment of a Complaints and Response Mechanism

In order to make a CRM effective and successful its establishment is guided by some basic principles:

- **Commitment to fairness**, transparency and accountability towards the affected communities we work with.
- **Participation** to develop a locally adapted mechanism for each specific context: Articulation and handling of complaints is a very culturally sensitive and context specific issue. It is therefore important to involve all stakeholders in the design and establishment of the mechanism, otherwise it is unlikely that it will be used.
- **Safe access** to the CRM for all potential users, especially those that are most marginalized and vulnerable.
- **Confidentiality**: In order to create an environment in which people feel safe to raise a complaint it is vital to ensure that information received by complainants is treated confidentially and only shared with a limited number of people necessary to resolve the issue.
- **Clear information**: The mechanism can only be effective if affected communities have knowledge about how it works and are reassured that it is safe and confidential to raise complaints without fear of retaliation.
- **Simple and effective** mechanism that is easy to implement for staff in charge especially at project level.
- **Openness to learning**: Complaints can give important information on areas where there is room for improvement. This should be seen as an opportunity to improve the way we serve affected people and to increase the impact that our programmes have in the communities.

### Types of Complaints

Complaints can be categorized in two main categories, sensitive and non-sensitive ones.

**Non-sensitive complaints** relate directly to the programmes implemented by Barefoot Initiative or its partners, i.e. the project activities, funding, communications, etc. Non-sensitive complaints are dealt with according to the procedures laid out in this guideline.

**Sensitive complaints** require a more complex investigation and usually concern one of the following:

- Misuse of funds, corruption or fraud. The investigation of suspected cases is regulated in the Barefoot Initiative Finance Policy and Conflict of Interest Policy.
- Misconduct and abuse of any kind to children. The investigation of such cases is undertaken in accordance with the Barefoot Initiative Child Protection Policy and the procedures therein.

# 1. POLICY IN PRACTICE

## Design and Implementation of a Complaint Mechanism in 6 Steps

### Step 1: Identify Appropriate Communication Channels together with Affected Communities

A CRM cannot be effective if it doesn't take into account the local context. It is therefore essential that communities and other stakeholders participate in its design from the beginning. As mentioned above raising complaints is a culturally sensitive issue and must be handled adequately according to each local context. Apart from considering literacy levels and technical access to different means of communication it is crucial to also assess social and power dynamics before deciding on communication channels. This assessment is needed to make sure that all members of the community can access the CRM and can do so safely. Special attention needs to be paid to the participation of marginalized groups in the design of the CRM. The assessment should include an analysis of existing systems for community feedback and complaints and how far they are accessible also for vulnerable community members. In some cultures, complaining may not be considered as culturally appropriate so it is important to find out in which way dissatisfaction and grievances are expressed in a specific context and which terminology is acceptable to use in the CRM. **Annex 1.** provides a list of questions that can be helpful for the discussion with communities when designing a context-specific CRM.

### Different Target Groups of the CRM

When designing a comprehensive CRM it needs to be considered that the beneficiaries are not the only ones who can make a complaint (see above). Other target groups of the CRM are e.g. representatives and staff of the partner organisation or other stakeholders of the project and affected community members who do not directly benefit from our projects. It is useful to differentiate these user groups of the CRM and identify appropriate channels through which each group can raise their complaints.

### Options for the Communication of Complaints

There are many possible channels through which complaints can be received by the project team. Each of them has advantages and disadvantages that vary depending on the local context. It is recommended to identify together with the beneficiaries at least two different channels for individuals to make a complaint so that people can choose the method they prefer. At least one of the chosen channels should offer the possibility to raise complaints confidentially.

The following list is not exhaustive but presents some of the mechanisms that can be used to collect complaints:

#### Phone number for sms or calls, if possible tollfree

- Suitable in areas with high coverage of mobile phones
- Option for sensitive complaints that need high degree of confidentiality
- Accessible also for people with mobility challenges

- Option for use in insecure environments
- Requires consistent availability of staff to answer the phone

#### Published email address

- Requires community access to internet and high literacy
- Option for sensitive complaints that need high degree of confidentiality
- Accessible also for people with mobility challenges
- Option for use in insecure environments

#### Focus group discussions for feedback and complaints

- Opportunity to build trust between the organisation's staff and communities and give a voice to vulnerable groups
- Requires appropriate and capable facilitators
- Need for an additional more frequently available complaints channel, also for sensitive complaints

#### Home visits to beneficiaries

- Requires time and staff if to be carried out regularly
- Opportunity to collect complaints from marginalized groups who may have challenges accessing other communication channels
- Opportunity to build trust between organisation's staff and communities
- Challenging to be carried out comprehensively for a large group of beneficiaries

## **Step 2: Advertise the Complaints Mechanism**

Once the CRM has been designed and established, information about it has to be shared with affected populations, partners and other stakeholders so that everyone knows what they can expect from Barefoot Initiative and how they can raise their concerns and complaints if they are not satisfied with the organisation's performance or the behaviour of its staff or volunteers. The way and methods for publicizing the CRM among its target groups also depend on the local context. Useful information for this can also be drawn from the assessment of the local context carried out in step 1. When sharing the information about the CRM one of the essential messages is to give assurance to the affected communities that the mechanism is confidential, safe and that there won't be any retaliation for raising a complaint. It is equally important to manage expectations as people may hope to find solutions for all their grievances through the CRM, be they related to Barefoot Initiative activities or not.

## **Step 3: Receive and Record Complaints**

### **Designate Staff to Receive Complaints**

It needs careful consideration to decide who among the project staff will be in charge of receiving complaints, especially those being raised through verbal channels. Criteria to be considered are availability in the project area, knowledge of local language, etc. It is recommended to designate at least one male and one female staff so that complainants can choose who they prefer to address. It is also recommended that wherever possible the staff responsible for receiving complaints is not part of the team who is directly in charge of the project implementation. At the same time it needs to be considered that people need to build

a certain level of trust to the person who they complain to and therefore it can be challenging to designate a person to receive the complaints who is unknown in the project. So also in this regard designating at least two persons, one from the project team and one who is not part of it, can be useful.

### **Record Complaints**

The staff member in charge of receiving the complaints is also responsible for their documentation. All complaints must be recorded in the complaints log using the format in **Annex 3**. The complaints log contains information about the complainant, the details of the complaint and also about the status of the response by Barefoot Initiative and the outcome. It is the responsibility of the person in charge of keeping the complaint log to make sure that the follow up of each complaint is also recorded in the log.

Complaints received through verbal channels should be written down by the staff member receiving the complaint using the complaint record form in **Annex 2**. The complaint is then followed up the same way as a complaint received in writing.

### **Confidentiality**

The complaint forms and the complaint log have to be kept in a safe place to which only Barefoot Initiative personnel who are in charge of managing the CRM have access. Barefoot Initiative personnel who have access to complaints data are reminded of the protection of data and confidential information as stated within the Information Collection & Confidentiality Policy. Complaint records containing personal data of the complainants have to be destroyed by the end of the project. Only reports without personal data and lessons learned from the CRM are to be retained for learning purposes.

## **Step 4: Clarify Complaints**

The person receiving a complaint has to analyze it based on several criteria:

- Does the complaint fall within the scope of the organisation, i.e. is it attributable to a Barefoot Initiative project or personnel member?
  - ⇒ If No, refer the complainant to the appropriate organisation, authority or ombudsman to handle the matter. Try to give as much support as possible to the complainant to receive access to an organisational body or person who is competent to solve the issue.
  - ⇒ If Yes, but the complaint is about a staff member of a Barefoot Initiative partner organisation, it will be referred to the most senior member of staff of the partner unless it is unsafe or inappropriate to do so due to the nature of the complaint. The complaint has to be recorded and the response by the partner should be followed up.
- Is it a sensitive complaint?
  - ⇒ if Yes, follow procedures according to respective policy (see above “Types of complaints”)
- if it is a non-sensitive complaint which is related to a Barefoot Initiative programme, follow the steps detailed below.
- In case the analysis of the complaint shows that it is of malicious intent or manifestly unfounded, the complaint will be rejected and the complainant informed thereof.

## **Step 5: Resolve Complaints**

When designing the CRM it needs to be decided who will be in charge of handling the complaint once it is recorded. Usually this is the same person who receives the complaints but depending on the setup of the project and the chosen communication channels there might also be several persons receiving the complaints in the communities who then hand them over for a response to one central complaints manager. If the project is fully implemented by a project partner it may be necessary to establish a multilevel mechanism with a complaint's manager both at partner and Barefoot Initiative level. As mentioned above, ideally, the staff receiving and handling complaints should not be directly involved in the project implementation although s/he liaises closely with the project manager in order to resolve complaints resulting from the project.

Whenever possible, staff is encouraged to resolve complaints immediately if they can be dealt with easily. However, even if a complaint can be solved on the spot it should still be recorded for learning purposes. If a complaint cannot be resolved immediately the complainant should receive a response to his/her grievance within 5 working days. If the complaint is sensitive or more complex in nature so that an investigation is needed, the process should be completed within 1 month and if that is not possible the complainant must be kept informed of the progress.

### **Anonymous Complaints**

If a complaint is received anonymously it still needs to be assessed whether it is substantial and whether there are any actions needed to solve the complaint, even though it isn't possible to give a response

directly to the complainant. The fact that a complaint is made anonymously may be an indicator that people are not trusting Barefoot Initiative confidentiality and are concerned about their safety making a complaint. This should be considered as a warning signal to the organisation that the complaint mechanism may need to be reviewed.

#### **Situations where Barefoot Initiative Stop Responding to a Complaint**

Any person who has a grievance with regard to Barefoot Initiative activities or personnel/volunteers has the right to express it and be heard. However, it can be expected that complaints are raised in a fair and appropriate manner. In case that a complainant resorts to harassing or abusing Barefoot Initiative personnel in order to pursue his/her complaint, Barefoot Initiative may stop the investigation of the complaint and decide not to correspond about it any further with the complainant. This decision and its justification will be communicated to the complainant by the Co-Managing Directors and documented in the complaint records.

#### **Step 6: Learn from Complaints**

There is a great opportunity in learning from complaints. It is therefore important that all complaints are recorded so that the records can be reviewed in order to identify opportunities for improvement and agree on steps forward. The Co-Managing Directors will be responsible to record all complaints in Annex 3 (excluding any personal data of the complainants) with the objective to use this information to identify opportunities for better programme design and implementation. These lessons learnt should be shared with the Board of Directors during board meetings.

#### **Complaints Received via Barefoot Initiative website**

Any complaints received via the “Feedback & Complaints” button on the Barefoot Initiative homepage will be managed by the Co-Managing Directors and shared with the Board of Directors at board meetings.

## 2. MONITORING & REVIEW OF POLICY

The Co-Managing Directors are responsible to ensure this policy is implemented and updated every two years. All updated versions of this policy will be validated by the Board of Directors.

## 3. RELATED POLICIES & PROCEDURES

- Child Protection Policy (Annex 3. Child Incident Reporting Sheet)



## ANNEX 1: Engaging with Beneficiaries to Design a Context-specific CRM (Source: CHS Alliance)

Some questions to explore with beneficiaries and disaster-affected communities:

### **Language**

- Is complaint a sensitive word in the local language?
- What is the literacy rate among men and women?
- Is there a 'culture of complaining', or a taboo against complaining?

### **Traditional system**

- Is there an existing traditional system for complaining locally? Is it formal or informal?
- What does it handle and how?
- Are there any conflicts that will impact the mechanism?
- What is the situation with political groups and the authorities – is there anything to be aware of?

### **Types of complaints**

- What are the kinds of things people complained about in the past?
- What kinds of things might people complain about?

### **Access**

- How do people prefer to complain or raise an issue?
- How can marginal or vulnerable groups access the mechanism? What might prevent them from coming forward to complain?
- 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? If staff, boss, someone else? Is it acceptable for women to talk to unknown men?
- How would people prefer to raise sensitive complaints?

### **Submission**

- How would people prefer to submit a complaint?

### **Communication**

- What communication means is available and preferred?
- Do people value receiving feedback? Is this important to them and what is the preferred method of getting this?
- Do people prefer to be anonymous or are they happy to put their name on complaints?
- What is a reasonable time period for receiving a response to a complaint?



ANNEX 2: Complaints Record Form

Complaint number:	
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**Part 1: To be filled by or for the complainant**

Date complaint is received:	
Project/ Location:	
Name and contact of complainant:	
Personal details of complainant:	Age: Adult <input type="checkbox"/> Child <input type="checkbox"/> Sex: Male <input type="checkbox"/> Female <input type="checkbox"/>

Detailed description of the complaint:

Description of expected outcome/ response:

Comments:

**Part 2: For Barefoot Initiative use**

Response given:
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Response date:	
Response accepted?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Response appealed?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Lessons learnt:	



### ANNEX 3: Complaints Log

⇒ Refer to excel sheet Annex 3: Complaints Log