

# Complaints and Response Mechanism Framework Policy and procedure



Approved June 2008

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## Policy Statement

Having a well designed and well managed mechanism for handling external complaints can improve the quality of our work, enhance the trust and confidence of our stakeholders, identify areas of our work which need to be improved and ensure that ActionAid learns from the feedback provided through this process.

ActionAid therefore welcomes feedback and will react constructively to complaints from the people it works with, its supporters/ donors, the general public, official bodies and its partners.

The complaints and response mechanism links to the principles of our Accountability, Learning and Planning System (ALPS) and will ensure feedback, transparency and learning which will strengthen our accountability as an organisation.

This policy applies to all units of ActionAid; country programmes, affiliates, associates, international themes and functions and regional offices.

## What is a Complaint?

In the context of this policy, a complaint is an external grievance made against ActionAid or more specifically against one of its employees, associated “consultants” or partners where the organisation has allegedly failed to meet a commitment. That commitment might be related to our activities, our use of resources, our mission and values, staff conduct / behaviour or a legal requirement.

### *What Complaints will ActionAid consider?*

ActionAid will receive and respond to all complaints. If it

is established that a complaint has been made maliciously, in bad faith or without serious intent then a response will be made to the complainant explaining why their complaint is not being taken further.

### *The Nature of Complaints*

There are different types of complaint that may be made to ActionAid. Here are some examples of the wide ranging complaints ActionAid might receive. These can apply to country programmes, international secretariat offices (including regional), funding affiliates, and international themes and functions.

The range of complaints might include favouring one section of the community above another, the distribution of emergency supplies, how local funding is being spent or a complaint about the behaviour of a staff member. A complaint may be with regard to dissatisfaction with our policies, our child sponsorship programme, our campaigning style or an administration error.

ActionAid might receive a complaint about how a recruitment process was handled, ActionAid's campaigning style, our fundraising approach or the actions or behaviour of a staff member.

ActionAid may receive complaints about our portrayal in the media, about the facts of a particular international campaign or about the way we work. These may come, for example, from intergovernmental organisations, other international non-governmental organisations or from trusts and foundations.

**Criminal Allegations:** This might include allegations of fraud, unlawful harassment or child abuse which will also relate to local laws and regulations in addition to

ActionAid policies and procedures. In such cases the most stringent standard will apply whether it be the local regulations or ActionAid's policy.

## Principles

- All complaints and constructive feedback will be taken seriously whether submitted from a named source or anonymously.
- All complaints will be handled swiftly so far as reasonably practicable depending on the nature and complexity of the matter, ensuring that they are dealt with in a timely manner.
- The process for making a complaint will be made clear to stakeholders.
- Complaints will be recorded through one central point before any action is taken.
- Complaints will be addressed as locally as possible at two levels—at national level and at international level, using the agreed complaint procedure and only escalated to management if they are of a serious nature.
- Sufficient resources and expertise will be provided to handle complaints.
- Staff will be briefed on the nature and purpose of the policy and senior managers dealing with the complaints will be given training in handling complaints.
- Confidentiality relating to the complaint will be safeguarded so far as reasonably practicable including the person(s) to whom the complaint is addressed.
- Issues of conflict of interest will be identified to ensure objectivity.
- Complaints will be handled in accordance with ActionAid's policies and procedures and in accordance with local laws and regulations..
- Country Directors at the country level, International Directors, Affiliate Executive Directors and the Chair of the Board at the governance level depending upon the nature and level of complaints will be the key people to receive external complaints.

## Standards

Standards should be set locally depending on the resources and expertise available, but these are the minimum standards

1. All complaints to ActionAid should be acknowledged as soon as possible but ideally at least within 5 working days by the recipient. All complainants will receive a copy of our policy.
2. All complainants should receive a response giving the outcome of their complaint as soon as possible but

ideally at least within 30 working days of receipt. If more complex then a further acknowledgement should be sent explaining what further investigation is required to resolve the complaint and the likely timeline.

3. All complaints should be recorded on a Complaints Record Form (Appendix 1)
4. All complainants will be treated respectfully, whether it is felt the complaint is justified or not

## Procedure

Given the different nature of complaints the procedure needs to reflect all circumstances, but should be adaptable to the local situation.

### 1. *Raising Complaints with ActionAid*

Each affiliate, associate, country programme, international secretariat office should ensure that its stakeholders are clear that ActionAid welcomes complaints and constructive feedback and knows how to raise a complaint with the organisation.

There should be one central point where complaints are made:

At the country level, for management issues, this should be sent to the email address [complaints.country@actionaid.org](mailto:complaints.country@actionaid.org) (e.g., [complaints.ghana@actionaid.org](mailto:complaints.ghana@actionaid.org)) but the complaints against the Country Director should be sent to [Boardchair.country@actionaid.org](mailto:Boardchair.country@actionaid.org); at the international level complaints should be sent to [complaints.international@actionaid.org](mailto:complaints.international@actionaid.org) and at governance level complaints should be sent to [internationalboard.chair@actionaid.org](mailto:internationalboard.chair@actionaid.org).

Postal complaints can be sent to the Country Director, Chief Executive or the Chair of the International Board at ActionAid's official addresses. The heads of internal audit at the country level and international levels will have the Country Directors and Chief Executives delegate responsibility to collect and initiate the complaint response. Where there is no internal audit function then the Country Director or Chief Executive will appoint someone to fulfil this role. It is important that the function acting as the central point keeps appropriate confidentiality and only the parties relevant to solving the complaint are involved.

It is important that the person handling the complaint ensures that the named contact for complaints is informed and that the Complaint Record Form (Appendix 1) is completed.

## **2. Receiving Verbal and Written Complaints**

The complainant must be treated with respect at all times.

It is important that the person receiving a complaint face-to-face should clarify the issues underlying the complaint, listen to what the complainant has to say and make a brief and accurate written summary of the complaint. Where necessary, language interpreters may be required to help establish the nature of the complaint.

If the complaint is in writing it might be appropriate to write or speak to the complainant to clarify the facts of the case.

## **3. Acknowledging Complaints**

Complainants, who are not anonymous, will receive an acknowledgement of their complaint to confirm that it has been received and an outline of the next steps.

## **4. Registering Complaints**

All complaints, whether verbal or written, should be recorded on the Complaints Record Form (Appendix 1). Each complaint should also be recorded on the log form (or a simple database) which will form the basis for review at the end of each year.

## **5. Resolving Complaints (Investigation and Action)**

Each complaint will be investigated. The person handling the complaint will:

- Establish the facts and gather the relevant information
- If necessary and/or practicable, interview those involved.

If, as a result of the investigation it is felt that there is a case to answer by the staff member then the appropriate disciplinary and other organisational policies and procedure, for example, ActionAid's anti-sexual harassment, the financial management framework's policy of fraud and other irregularities and the child protection policies should be followed. Any applicable local employment law should be followed and taken into account.

## **6. Responding to the Complainant**

Complainants, who are not anonymous, will receive a response outlining the outcome of the complaint or, if it is a complex matter, when it will be investigated further and how long it is likely to take. ActionAid will let the complainant know the outcome which may include the:

- corrective action which has been taken
- timeline for implementation
- person/role addressing the issue

Wherever possible ActionAid will invite the complainant to outline suggestions for actions the organisation can take to ensure similar complaints do not arise in future.

## **7. Appeals Process**

If a complainant is unhappy about the response received from ActionAid or if they believe the corrective action has not been adequately implemented they may appeal to the next level; if the complaint is about a matter at country management level then to the National Board Chair; if the complaint is about the governance in the country then to the Chief Executive and; if it is about the Chief Executive to the Chair of the International Board.

If the complainant continues to be dissatisfied with the outcome, after all avenues have been explored to resolve the complaint, a letter will be sent to the complainant explaining the steps/actions that have been taken, outlining any changes that have been put in place as a result of the complaint and bring the matter to a close.

## **The Role of National Boards and International Board**

ActionAid's complaints and response mechanism needs to be transparent and independent. In very serious cases a complaint may require a national Board of Trustees or the International Board, to investigate and make a response. The national board of a country also has a role in overseeing the number of complaints received by ActionAid and ensuring that they have been handled satisfactorily and that the corrective action has been implemented.

## **Monitoring the Policy and Procedure**

As part of the annual participatory review and reflection process (PRRP) each affiliate, country programme, international theme and function will be asked to reflect on the learning from the complaints and constructive feedback they have received. This will feed into country programmes' and affiliates' annual reports and then into the ActionAid International Annual Report.

The Internal Audit function will include a review of the complaints mechanism to ensure that country programmes and affiliates are adhering to and resolving complaints as part of their internal audit process.

# Guidance on Implementation

Each country programme, affiliate, theme and international function will be asked to implement the framework with their context in mind.

## Designing a Complaints Mechanism

### *Consultation with Local Communities*

The first step will be to consult with the people in communities we work with to establish the right approach. Aspects that need to be considered are the languages the local community prefer you use, the levels of literacy, and whether it would be better to have oral rather than written procedure.

Local knowledge of the community would be needed to ensure that the process and information is available by the most effective means which might include:

- transparency board
- suggestion box
- reception book for complaints/comments at country office/ partner office

### *Consultation with Stakeholders*

Some initial consultation with official bodies, supporters and relevant organisations to establish the best method of making a complaint to ActionAid will be essential.

### *Analysis of the Types of Complaint*

It is recommended that all country programmes, affiliates, international themes and functions undertake some initial analysis of the types of complaint received at the local level. This will ensure that any adaptation of the policy will include the range of types of complaints pertinent to that particular country programme or affiliate.

## Training for Staff

Training should be provided to members of staff who are handling complaints. The training should include elements around:

- Receiving complaints: listening and empathising skills
- Responding to complaints: using tact, understanding the complainant view point and responding using constructive language
- Investigating the complaint: gathering factual information, interviewing skills
- Handling difficult complainants: how to respond when under pressure,

## Briefing and Induction for Staff

As part of implementing the policy and procedure, all staff should receive a briefing on the benefits and purpose of the policy. This should be via a staff briefing meeting or another appropriate communication vehicle.

Information about the policy should be included in the induction for new joiners.

# Complaint Record Form

This is an example which can be adapted as appropriate.

All complaints should be recorded and logged. These records will be used to ensure complaints are dealt with efficiently and effectively and to monitor any trends. It will provide information on the number and types of complaints ActionAid is receiving.

<b>Date:</b> <i>Date complaint is received</i>	
<b>Personal Details:</b> <i>name, contact details, if appropriate</i>	
<b>Nature of Complaint:</b> <i>Brief outline of the complaint</i>	
<b>Detail of Complaint:</b> <i>a detailed description of the complaint the person has made</i>	
<b>Who dealt with it:</b> <i>name of person who is or has responded to the complaint</i>	
<b>How it was dealt with:</b> <i>action taken to handle the complaint</i>	
<b>Outcome:</b> <i>outline of what has happened as a result of the complaint</i>	
<b>Follow up required:</b> <i>any action required as a result of the complaint. This may include a change to AA's procedures and policies</i>	

# Log of Complaints - 2008

Date:	Nature / Detail of Complaint:	Who dealt with it:	How it was dealt with:	Outcome:	Follow up required:

# FLOW DIAGRAM FOR HANDLING EXTERNAL COMPLAINTS AT ACTIONAID

