**{INSERT ORGANISATION NAME HERE}**

**COMPLAINTS POLICY**

**Date**

**1.0 INTRODUCTION**

{INSERT ORGANISATION NAME} is committed to being accountable for our actions and the decisions we take. We aim to ensure that we listen to the needs, concerns and views of those involved in or affected by our work.

Throughout our work, {INSERT ORGANISATION NAME} puts systems in place to safeguard and protect individuals from any form of harm as a result of our activities. However, we recognise that mistakes can happen and we are committed to being accountable for those mistakes. We want to hear people’s concerns, act on what people tell us and be answerable to them for the decisions that we make.

To this aim, {INSERT ORGANISATION NAME} is open to hearing all feedback and complaints about our work. A Complaints Handling Mechanism (CHM) is set up to manage, respond to and monitor feedback and complaints received by us.

By listening and responding to complaints {INSERT ORGANISATION NAME} aims to:

* Be accountable to people and organisation we work with
* Ensure the respect and dignity of those wishing to raise a concern or complaint about {INSERT ORGANISATION NAME}
* Be alert to problems in our work and rectify potential issues quickly
* Help us continuously to learn and improve
* Raise awareness amongst those we work with and other parties about their rights and entitlements.

Nothing in this policy should be understood as taking away the right of any individual, group or organisation to seek redress under any relevant legislation.

**2.0 SCOPE**

Although feedback and concerns are raised and discussed between our staff and stakeholders, a formal CHM is required for those occasions when complaints cannot be resolved informally and an individual or organisation wishes to make their complaint a matter of record or receive a formal response. Any concern relating to potential abuse, exploitation or fraud will always be considered within the framework of a formal complaint.

{INSERT ORGANISATION NAME} are only in a position to respond to complaints relating to our organisation and our work. We may also consider complaints relating to organisations which we have a contractual arrangement with. We cannot respond to complaint beyond our scope of work. In addition, we have specific mechanisms in place to respond to staff grievances which are not covered under the scope of this policy.

This complaints policy will cover complaints/feedback received about our partner/donor organization and their staff.

## Anonymous Complaints

{INSERT ORGANISATION NAME} will accept anonymous complaints, recognising that they may be legitimate and that there may be good reasons as to why the Complainant does not want to disclose their identity. However, following up and responding to such complaints will be more difficult.

## Historical Complaints

{INSERT ORGANISATION NAME} will accept complaints no matter when the issue of concern occurred. We will endeavour to resolve these complaints to the best of our ability but recognising that with passage of time some evidence may no longer be available.

**3.0 GUIDING PRINCIPLES**

INSERT ORGANISATION NAME endeavours to adhere to principles of best practice when managing and responding to complaints.

**3.1 Confidentiality**

Confidentiality helps create an environment in which people are more likely to raise concerns, complain or stand in witness to bad practice or incidents of abuse. The CHM ensures that all complaintsare handled in a confidential manner. To ensure this, complaints are only handled by designated staff members.. All information regarding complaints is considered confidential and information is shared on a need-to- know basis. All information regarding complaints is filed in a secure restricted-access system within {INSERT ORGANISATION NAME}.

**3.2 Accessible and Transparent**

A CHM is transparent when all stakeholders are aware of the purpose and process, understand how it works and are able to use it in a way that is most accessible for them. {INSERT ORGANISATION NAME} will explore with communities / stakeholders how to make the CHM accessible to them.

**3.3 Safety**

A safe CHM will consider potential dangers and risks to all parties involved in the process. {INSERT ORGANISATION NAME} will endeavour to ensure that there is no retaliation against individuals in response to complaints made against {INSERT ORGANISATION NAME}.

**3.4 Caring for people involved in a complaint**

{INSERT ORGANISATION NAME} recognises it has a duty to ensure that advice and support is available for all parties involved in a complaint. We will details of local networks and structures where relevant support may be available.

**3.5 Responsive, Objective and Fair**

{INSERT ORGANISATION NAME} will ensure that complaints are acknowledged promptly and that Complainants are advised of the process and when an outcome has been reached. {INSERT ORGANISATION NAME} will respond to complaints in an equitable, objective and unbiased manner.

**3.6 Remedy and Review**

{INSERT ORGANISATION NAME} will work with relevant parties to endeavour that complaints are satisfactorily resolved. It is envisaged that {INSERT ORGANISATION NAME} response will mostly fall into three types of resolution: Practice change, making good and restitution. In giving feedback we will advise the Complainant of the mechanisms for appeal if they are unsatisfied with the outcome.

**3.7 Monitoring, Reporting and Learning**

{INSERT ORGANISATION NAME} regards complaints as useful feedback to help us identify issues that we need to address in our programmes, partnerships, in the way we work and in the CHM itself. {INSERT ORGANISATION NAME} aims to adapt and evolve in response to all feedback, including complaints that we receive.

**4.0 DEFINITIONS**

**Feedback**

A positive or negative statement of opinion (in this case, about our work and the behaviour of our staff or representatives) shared for information or action but *not* with the intention of lodging a complaint.

**A concern or complaint**:

An expression of dissatisfaction. It is a specific grievance of anyone who believes that {INSERT ORGANISATION NAME] has failed to meet a stated commitment or of anyone who has been negatively affected by our work or our staff.

**Non-sensitive complaints** could include the following (not an exhaustive list):

* A concern about the quality of programme delivery or implementation
* A concern about the decisions taken by {insert organisation name} in relation to project implementation
* A concern on the implementation policy/advocacy aspects of the project

**Sensitive complaints** could include the following (not an exhaustive list). These complaints will be treated with confidentiality and fast-tracked through the complaints handling procedures:

* Exploitation and/or abuse by a staff member or organisation representative (including sexual exploitation and abuse)
* Fraud and/or corruption by a staff member or organisational representative, such as involvement in bribery or misusing aid or funds
* Any action which constitutes a breach of {INSERT ORGANISATION NAME} commitments or code of conduct

**5. ROLES & RESPONSIBILITIES**

|  |  |
| --- | --- |
| **Role** | **Responsibility & Expectation**  *Note some people may have more than one role (e.g. a manager who is also a complaints manager)* |
| All Staff | To ensure that the Complaints Policy is implemented.   * Read and understand the policy and ask questions (line manager or complaints manager if you are unsure) * Inform stakeholders you work with about the CHM * Ensure complaints received are forwarded without delay to the Complaints Administrator * Promote an open and approachable working environment |
| All Managers | To ensure all staff are supported and that systems and procedures exist to implement and monitor all complaints |
| Complaints Administrator | To ensure there is a system in place for receiving, assigning and recording of complaints   * Ensure a mechanism is in place for receiving and responding to complaints with associate timelines * Forward complaints to appropriate Complaints Manager * Monitor timelines and keep accurate recording system |
| Complaint Manager | To ensure that the complaint is resolved in a timely and fair resolution to complaint   * Liaise with the complainant and other relevant parties at key interval throughout the process * Maintain records of all correspondence, meetings and activities * Investigate complaints as appropriate * Liaise with case management team (for sensitive complaints) as appropriate * Ensure resolution actions are followed * Ensure opportunity for appeal is available and communicated where resolution cannot be agreed |
| Executive Leadership Team | To keep oversight and monitor the implementation of the policy, including systems and procedures   * Monitor organisational progress in terms of CHM * Have oversight of overall complaints and key learnings * Support implementation of key changes identified through the CHM |
| Appeal Managers | Appeals are escalated via the line management structure.   * Review of complaint received * Review of evidence gathered * Examine for gaps in evidence * Reach conclusion |

*This is not an exhaustive list and each organisation may need to adapt to suit your organisational structure*

**6.0 PROCEDURES FOR RECEIVING A COMPLAINT**

A complaints system is most effective when it is accessible and is communicated to everyone who may wish to raise a concern / make a complaint. This section explores some of the ways of doing this.

Channels for complaints may include: {INSERT ORGANISATION NAME}

* Website (insert link here),
* Dedicated email (insert email address here),
* Specific emails for sensitive complaints (e.g. safeguarding insert email address here),
* Phone (insert details here),
* In Person (all staff members can receive complaints)
* Post any complaints received via the post should be sent to the Complaints Receiver/Administrator (insert address here)
* Suggestion Box – Suggestions Boxes in Yangon and Myitkyina Offices.
* Other – There may be many other creative options that exist – these can be outlined here

*This is not an exhaustive list and each organisation may need to adapt to suit your {*

**7.0 PROCEDURES FOR RESPONDING TO A COMPLAINT**

{INSERT ORGANISATION NAME} takes all complaints seriously and will take appropriate steps to reach a fair decision. Steps for responding to a complaint are:

* Complaints are forwarded to the Complaints Administrator for logging.
* Sensitive Complaints are forwarded by receiver directly to the relevant sensitive complaint manager (e.g. safeguarding, fraud) who updates the case log with a case number. Specific details are held on a restricted access complaints log. If the receiver does not know who to refer the sensitive complaint to then it is referred to the Complaints Administrator for onward referral
* All complaints must be acknowledged within two working days (if this is not possible for some anonymous complaints then this must be recorded)
* The complaint is referred to the appropriate manager/feedback review committee for review or investigation (specific mechanisms are in place for sensitive complaints)
* {INSERT ORGANISATION NAME} will endeavour to respond and resolve all complaints within two weeks (except sensitive cases for which the complainant will be advised of timelines)
* If the complaint is not resolved in two weeks the complainant will be updated and advised of expected date for outcome
* The complaints manager will review relevant partner/donor grant agreement and accordingly take actions to notify to the relevant partner/donor about the complaints related to the programme area/participant/staff the partner/donor is supporting.
  + As per the grant agreement, the complaints manager/feedback review committee may work closely with the relevant partner/donor to respond to the complaints.
* Complaints related to partner/donor organization and their staff will be forwarded to the director, who will inform the director/senior management of the partner/donor organization. (Unless there are specific indicators that would put the complainant or others at risk)

**Resolution of Complaints**

It is envisaged that {INSERT ORGANISATION NAME HERE}’s response will fall into one of the following three types of resolution and action:

* **Practice change:** Our response will be a formal acknowledgement that practice fell short of the standards we set ourselves and reassurance that {INSERT ORGANISATION NAME HERE}’s practice will change as a result. We shall acknowledge the validity of the complaint, shall demonstrate change of {INSERT ORGANISATION NAME HERE} practice in the future, and shall reassure the Complainant that there is a change in practice.

**OR/AND**

* **Making good:** {INSERT ORGANISATION NAME HERE} will repair and/or replace the damage or omission i.e. making good to the Complainant(s).

**OR/AND**

* **Restitution:** {INSERT ORGANISATION NAME HERE} will provide restitution to the Complainant(s) where ‘loss’ or ‘damage’ is of such a nature that it cannot be made good.

**Please consider if this is relevant for your organisation**

**Appeals to {INSERT ORGANISATION NAME HERE}**

{INSERT ORGANISATION NAME HERE} aims to satisfactorily resolve a complaint for all involved. Where a Complainant is not satisfied with the outcome of the complaint, despite having had the opportunity to request further clarification or feedback, they can appeal the decision once to (insert contact details for appeals manager here).

**Withdrawn Complaints**

* When a complaint of a non-sensitive nature is withdrawn {INSERT ORGANISATION NAME HERE} will consider this complaint as resolved and deem the complaint closed.
* When a complaint of a sensitive nature is withdrawn {INSERT ORGANISATION NAME HERE} will consider the need to continue to investigate and follow-up giving consideration as to why the complaint was withdrawn.

Organisations may wish to add a flowchart to this policy. See annex 1 for an example but will need to be tailored for your organisation:

**8.0 MONITORING AND LEARNING**

The Complaints Administrator will prepare a report every six months on the types of non-sensitive complaints received (including recurring themes, time to reach conclusions). This report will be shared with managers (who share with their teams) to review practice.

The Executive Management Team (and appointed Board Members) will review the report on sensitive cases as prepared by the relevant Complaints Management.

These reports will not include any identifiable information.

**ANNEX 1**

Complainant

**1. RECEIVE COMPLAINT**

**2. PROCESS COMPLAINT**

**3. REVIEW and INVESTIGATE**

**4. RESPONSES and ACTION**

**Non-Sensitive**

**Sensitive**

**6. RESOLUTION**

**7. Monitoring, Reporting and Learning from complaints**