



# Help

**Hilfe zur Selbsthilfe**

**Help – Hilfe zur Selbsthilfe**

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**Implementation Manual chapter x.x.**

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**Complaints policy**

**Revised Version as of 21.04.2016**

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**Effective Date: 25.04.2016**

## Definition

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In the context of this policy, a complaint is an external grievance made against “Help – Hilfe zur Selbsthilfe”, any of the Country Offices, more specifically against one of our employees, associated “consultants” or partners where the organization has allegedly *made mistakes, acted wrongfully, breached the codes* to which Help subscribes or failed to meet a commitment. Such commitment might be related to Help’s activities, programme plan, beneficiary criteria, standard technical performance or use of resources, mission and values, staff conduct/behaviour or a legal requirement.

This policy applies to Help’s operations globally.

### Why manage complaints?

**They are inevitable.** Every organization that works with people will receive complaints and feedback. That fact cannot be avoided. It has to be managed and seen as a positive way to learn and improve.

**It’s about accountability.** Receiving feedback from and responding to complaints from stakeholders is an important part of improving the accountability of Help. Handling community feedback is an opportunity to show communities that our programme is accountable to them. Complaints are an essential part of an accountable programme.

### **Commitment 5 of the Core Humanitarian Standard on Quality and Accountability: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints**

Ensuring that our stakeholders can hold us accountable will improve the quality of our work. We will use the information to endeavour to put things right and to help us to become more effective:

### Key actions

1. Consult with communities and people affected by crisis on design, implementation and monitoring of complaints-handling process
2. Accept complaints and communicate how the mechanism can be accessed and the scope of issues it can address.
3. Manage complaints in a timely, fair and appropriate manner that prioritizes at all stages the safety of the complainant and those affected.

### Organizational responsibilities

1. The complaints handling procedure for communities and people affected by crisis is in place and documented.
2. An organizational culture in which complaints are taken seriously and acted upon according to defined policies and processes has been established.

3. Communities and people affected by crisis are fully aware of the expected behaviour of Help staff (and associated partners, e.g. implementing local NGO), including organizational commitments made on the prevention of sexual exploitation and abuse and commitments relating to the enforcement of the UN child rights convention (refer to Help's Policy on prevention and Response to Sexual Exploitation and VENRO Code of Conduct on Child Rights)
4. Complaints that do not fall within the scope and control or influence of the organization Help are referred to a relevant party in a manner consistent with good practice.

**What not to do when receiving a complaint**

- Become defensive
- Argue with the person
- Be dismissive
- Blame others
- Make assumptions without knowing facts
- Make promises you can't keep
- Ignore the problem

**What to do when receiving a complaint**

- Listen
- Empathize with the person
- Repeat/make sure that you are understanding the situation

**Confidentiality**

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All complaints will be handled on a confidential basis if requested by the complainant. In some cases, it may be necessary to disclose information to third parties. This will be decided on a case-by-case basis and only with the agreement of the complainant.

Help will not respond to complaints made anonymously.

Any complaint should be made as soon as possible after the incident occurred. .

**Impartiality**

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Any investigative activity required will be conducted without regard to any person's relationship to Help, position or length of service.

The following provides a guide for designing and implementing a basic complaints handling mechanism with communities in Help projects and programming.

**Minimum requirements are as follows:**

- Communities are informed about their right to register complaints
- Communities are offered at least one way of making complaints
- A centralized record is kept of all complaints made including actions taken and the outcome of each complaint.

**Structure:**

**a) Understanding the context**

A complaints and feedback mechanism should be developed with reference to the local context, including consideration of:

- Existing systems and structures for community feedback and complaints  
e.g. are community complaints generally handled by a community leader or a community committee?
- Ways in which community members express dissatisfaction:  
Complaints are perceived differently in different cultures. It is important that complaint mechanisms are designed with sensitivity to community perceptions, e.g. it may be appropriate to put the emphasis on “feedback” (positive or negative), or, “comments and suggestions” rather than “complaints” in contexts where complaining is not considered to be culturally appropriate.
- Potential security risks for project staff and beneficiaries:  
For community members’ fear of retaliation can range from a concern that the individual or their community will be excluded from receiving aid or support to the fear that they will be personally persecuted for complaining.

**b) Target group**

Who is expected to use the mechanism?

Identify the stakeholders who will have access to complaints e.g. community leaders, community members, beneficiaries, local government, health workers, .....

**c) Types of complaints**

Valid complaints: an expression of dissatisfaction directly associated to commitments made and therefore within the control of the organization.

- Non-sensitive complaints e.g. complaints relating to project activities or funding;
- Sensitive complaints e.g. abuse and exploitation, staff misconduct, misuse of funds and fraud.

Non-valid complaints: usually relate to issues outside the control of the organization.

Non-sensitive complaints should be dealt with in an open and transparent way in liaison with the community.

Sensitive complaints require a higher level of confidentiality and referral to an ombudsman.

Non-valid complaints should be referred back to the complainant, assisting him/her to find an appropriate ombudsperson for their complaint, where possible.

## **E.g. Appeal Process for Complaints about Help and Dealing with Complaints about misuse of resources, misuse of organizational values, staff misconduct**

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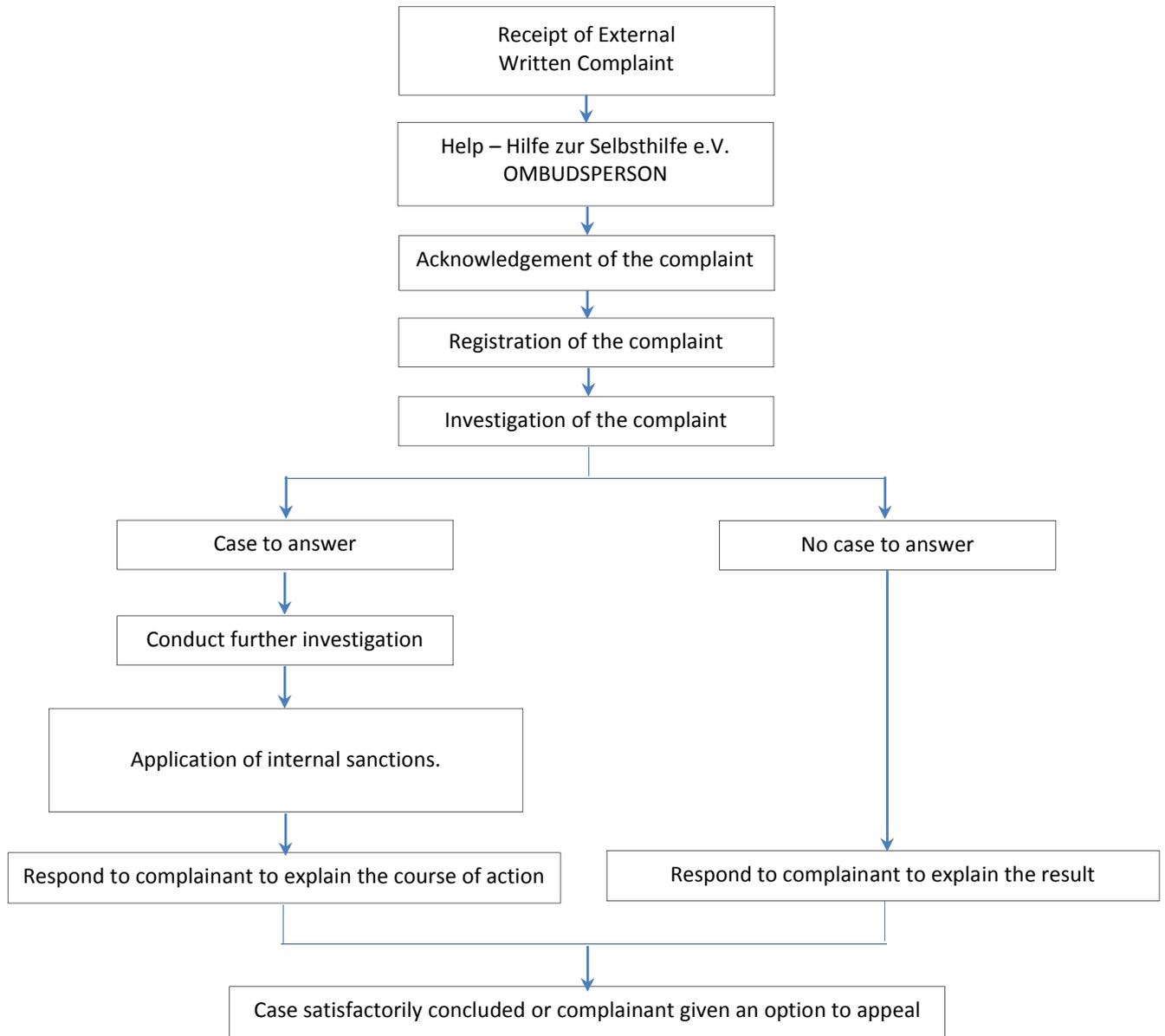
**Complaints of staff should be addressed to: “Ombudsperson of Help - Hilfe zur Selbsthilfe e.V.” in writing:**

- **by post, addressed to *Ombudsperson, Help –Hilfe zur Selbsthilfe e.V., Reuterstraße 159, 53113 Bonn, Germany, marked as “private and confidential”***
- **by e-mail to [ombudsperson\(at\)help-ev.de](mailto:ombudsperson(at)help-ev.de)**

1. All concerns should be raised in a written form including pieces of evidence.
2. All disclosures will be taken seriously.
3. Your disclosure under this policy will be acknowledged in writing confirming that the matter will be investigated and that the Ombudsperson will get back to you in due course.
4. All disclosures will be managed by the Ombudsperson who has specific and exclusive responsibility to investigate all reported violations. All investigations will be carried out objectively, confidentially, and independently.
5. We aim to start the investigation within two weeks of the disclosure. The length and scope of the investigation will depend on the subject matter of the disclosure. In most instances, there will be an initial assessment of the disclosure to determine whether there are grounds for a more detailed investigation to take place or whether the disclosure is, for example, based on erroneous information.
6. Appropriate action will be taken – this could involve initiating a disciplinary process, or informing external authorities if a criminal action has been committed e.g. fraud or theft. We will endeavour to inform you if a referral to an external authority is about to or has taken place, although we may need to make such a referral without your knowledge or consent if we consider it appropriate.
7. If it is found that there is not sufficient evidence of malpractice, or the actions of the individual(s) are not serious enough to warrant disciplinary action, it may be more appropriate for the Ombudsman to take a more informal approach to dealing with the matter.
8. You will receive written notification of the outcome of the investigation, though not all the details or a copy of the report.

Help reserves the right to choose not to investigate complaints judged as unfounded or frivolous.

This process does not replace Help's internal complaints processes and is separate from the complaints process made available to our own staff (see Help Whistleblowing Policy).



#### Case closed

If the complainant continues to be dissatisfied after all avenues have been explored to resolve the issue, a letter will be sent to the complainant explaining the steps/actions taken to close the case.

#### Monitoring of Complaints and Response Mechanism:

Each year an annual report will be provided to the Executive Board and the Members Meeting to review lessons learnt from the complaints that have been received and dealt with.

**What resources are required?**

The implementation of a basic complaints handling mechanism will require:

- Staff time to design an appropriate mechanism and communicate it to community stakeholders.
- Staff awareness and training in complaints handling procedures.
- Financial resources to cover the cost of communication material, maintenance of the complaints mechanism, staff time involved in receiving and processing complaints

**How to monitor if complaints handling mechanisms are to be effective?**

- Talk to community members – are they aware of their right to provide feedback and/or complaints and how to do so?
- Eventually review of complaints system

**Overview about different mechanisms for capturing complaints**

	Advantages	Disadvantages
Published telephone contact number	Direct access to programme staff An option for use in insecure contexts	Community will lose trust if telephone calls are not followed up Risk of abuse by anonymous complaints
Published E-mail address	Direct access to programme staff An option for use in insecure contexts	Depends on community access to internet Not suitable if low literacy levels Risk of "black mailing"
Time set aside at the end of community meeting	May be the most convenient option	Risk of vulnerable groups not feeling able to express their concerns
Community complaints committee	Enables a high level of accountability Builds community confidence and networks	May depend on facilitation and capacity building skills of programme staff
Community complaints/suggestions box		May be used inappropriately e.g. rubbish and black mailing Not suitable if low levels of literacy Risk of abuse by anonymous complaints
Focus group discussions to elicit feedback & complaints	Opportunity to build trust and tease out concerns from vulnerable groups	Requires an appropriate facilitator
Complaints desk	Semi-informal May encourage more people to interact with programme staff	Requires programme staff to resource the desk at set regular times
Weekly complaints & feedback hour at organisation offices	Ability for community members to air a grievance or concern discretely in a safe environment May be convenient for programme staff	Requires the office to be within easy access of the community
Programme staff carry complaints forms for ad hoc collection of complaints	Informal May encourage complaints from vulnerable groups or those less likely to participate in a group setting.	May affect ability of programme staff to effectively carry out programme activities