



Bangladesh Red Crescent Society

**GUIDELINE ON COMPLAINTS
RESPONSE MECHANISM (CRM)**

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1. Introduction and Rationale

In 2010, the Bangladesh Red Crescent Society (BDRCS) expressed an interest in exploring Community Engagement and Accountability (CEA) formally known as Beneficiary Communications and Accountability (BCA) as a crosscutting theme to be incorporated into its programmes. Following an assessment of BDRCS' institutional capacity to implement BCA, priority activities were identified for 2014 and 2015, which include setting up complaints and response mechanism (CRM), participatory radio show, SMS and others. In July 2014, a workshop on Complaints and Response Mechanism (CRM) was held in Manikganj in order to raise awareness of the value and importance of CRM in humanitarian work amongst key staff members of BDRCS, International Federation of Red Cross and Red Crescent Societies (IFRC) Bangladesh Delegation and representatives of Participating National Societies (PNSs) and IFRC Delegations in the South Asia Region (Nepal, Sri Lanka, Afghanistan and SARD office). In 2015, a sensitization workshop was conducted to revitalize the learning of the CRM training held in 2014 and review the draft BDRCS policy and procedures for setting up CRM in project communities and concerning future disaster response/recovery interventions. As part of the BCA initiative, BDRCS in collaboration with IFRC, aims to develop and implement CRM for the communities it works with, in order to build an environment of accountability and transparency, and more effective programming.

The rationale of the initiative is to ensure that our stakeholders, such as communities we work with, can hold us to account that will improve the quality and effectiveness of our work. Handling feedback and complaints is an essential part of an organization's commitment to being liable to its stakeholders. It can offer to validate whether specified goals are being met and signal well-timed changes or decisions to remedy or mitigate potential problems.

BDRCS strives to improve humanitarian interventions through placing communities it serves at the centre of its work. It is committed to learning, improving and encouraging the stakeholder it works with to comment on the progress and effectiveness of its interventions. This is achieved through establishing and implementing a CRM, that is user-friendly, safe and accessible, for managing, responding to and monitoring complaints within programs. The CRM supports a culture of accountability within BDRCS by ensuring accessibility to complaints handling policy, procedures and systems in all spheres of its work.

This guideline will set out the procedure for receiving, recording, and handling complaints or feedback from the communities. It will define what kinds of complaints can be received and what will be outside of the remit of BDRCS and who can complain. It will describe the steps of dealing with a complaint and the learning process to improve the system. BDRCS's commitment to fairness and transparency toward vulnerable people is central to establishing CRM in the project and will be guided by the principles (Confidentiality, Accessibility, Transparency, Participation, Contextualization and appropriateness and Safety and Non-retaliation) in the CRM Policy.

It is expected that most complaints or concerns related to the activities of BDRCS can and will be dealt informally by staff or volunteers at local level. However, it is understood that not all issues can be resolved in this manner. Thus, a formal complaints mechanism is required for those occasions when an individual or a group wishes to make their complaint a matter of record and receive a formal response.

2. Different Programmes and CRM perspective

Direct participation and contribution from the target communities are encouraged to ensure ownership and building sustainable community-led programmes by ensuring community resilience in reducing disaster and climate change risks. Furthermore, these programmes can continually strengthen BDRCS capacity, volunteer base and resources. The key outcomes of the programmes can be as follows:

- a. Developed community specific action plan and preparedness capacity to tackle disaster and climate risks.
- b. Most vulnerable households identified and provided with support on livelihood diversification, skill development and appropriate mitigation measures focusing on women empowerment.
- c. Strengthened National Society capacities to deliver and sustain scaled up programmes in disaster risk reduction.
- d. Enhanced BDRCS humanitarian diplomacy role in DRR/DM and Climate Change.

In addition, there is clearly defined links between CEA and PMER, as CRM should be integrated in programme implementation as a tool to assist in monitoring and evaluation (M&E) processes and activities. Feedback from communities provides a key source of continuous monitoring of data and therefore of the effectiveness and progress of an ongoing programme.

3. Overall goal

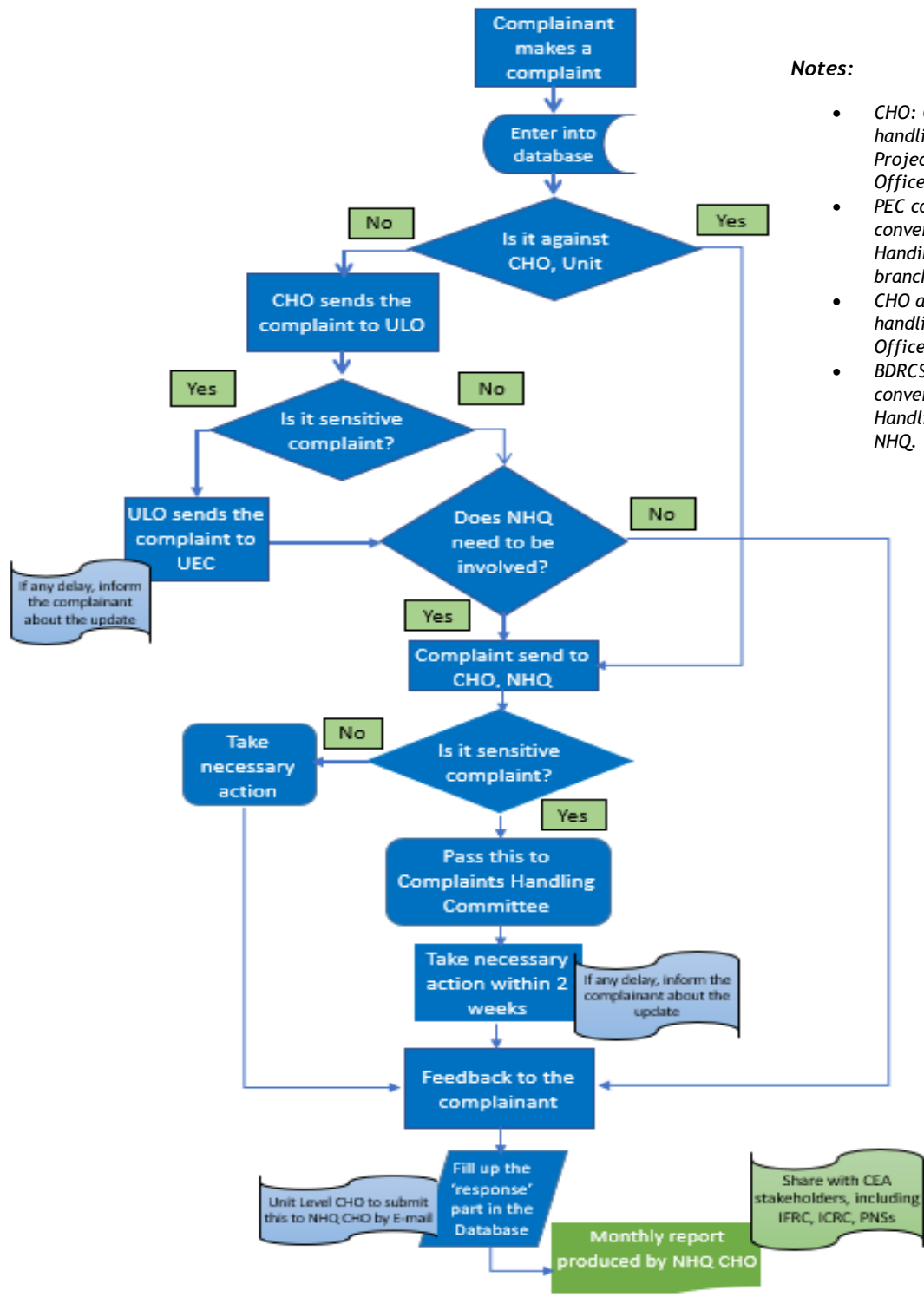
To support an overall environment of accountability and transparency, through the development and implementation of a formal CRM for the different community-based programmes.

4. Outcomes and Intended results

- A safe, confidential and accessible channel of providing complaints and feedback on the community-based programme interventions is set up.
- Communities are knowledgeable and confident to raise concerns and provide feedback on programme activities.
- Communities are empowered to play an active role in influencing the decisions and shaping the direction of the programme.
- The knowledge and capacity of BDRCS programme staff and/or volunteers to provide mechanisms for beneficiaries/communities to give feedback or log complaints and receive a response is improved.
- Any programmatic errors as well as instances of staff misbehaviour or breaches of the code of conduct are detected and resolved at an early stage.
- Improved M&E as beneficiaries/communities have the opportunity to raise issues that may not have been identified or defined when designing the monitoring framework or plan.
- Formalised processes are in place which ensure that the feedback loop is closed, issues are recorded in programme reporting activities, and appropriate action is taken to address feedback and/or adjust programmes.
- Better programme quality as a result of activities which are more responsive to and inclusive of the needs and concerns of target communities.

5. Methodology

To introduce a formal CRM in the communities set steps are to be followed. The sets of activities for the formal CRM are as Annex.



Notes:

- CHO: Complaints handling officer/ Asst Project Officer/ Project Officer, BDRCS.
- PEC convenor is the convenor for Complaints Handling Committee at branch level.
- CHO at NHQ: Complaints handling officer/ CEA Officer at NHQ
- BDRCS CEA Focal is the convenor of Complaint Handling Committee at NHQ.

Figure 1: Overall CRM process of BDRCS

6. Scope to Complaining

The scope of CRM in the program will attend complaints and feedback which are directly or indirectly associated with program activities. A **valid complaint** has to be about an action for which the organisation is responsible or is within the sphere of influence or control of the organization. Complaints can be categorised as:

(a) General/Non-sensitive complaints could include the following:

- A concern about the quality of programme delivery or implementation.
- A concern about the decisions taken by organisation in relation to project implementation.
- A concern on the implementation policy/advocacy aspects of the project.

(b) 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:

- Sexual exploitation and/or any type of abuse by a staff member or volunteer.
- Fraud and/or corruption by a staff member or volunteer, such as involvement in bribery or misusing aid or funds.
- Any action which constitutes a breach of BDRCS' principles or code of conduct including staff behaviour.

A complaint is not: a general query, request or suggestion/feedback about BDRCS' work. This is also referred to as **non-complaint** relating to an action for which BDRCS is responsible or is within the sphere of BDRCS influence. **Invalid complaints** relate to issues outside the control of BDRCS. This can be referred to other agencies considered responsible, but **BDRCS cannot accept the responsibility for how the other institutions or agencies treat complaints**. This could include the following:

- A contractual or legal dispute.
- An issue relating to the work of other humanitarian agencies.
- An issue concerning criminal or illegal activities.
- Social and family conflict, personal gain – job, opportunity, etc.

A complaint may be made by –

- any individual, group or community directly involved in the activities that are being carried out by BDRCS.
- parties indirectly affected in the locations of BDRCS' work, including the wider communities, local leaders and government representatives.

7. Complaints Resolution Committee (CRC) and Roles & Responsibilities

There will be one team in each community to open complaints box and two Complaints Resolution Committees (CRC), one at the district unit and other at the headquarters, to deal with complaints and feedback. The roles and responsibilities of different persons involved in the CRC are elaborated below

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7.1 Box Opening Team or CRC at Community Level

There will be one team, comprising with following personnel, in each community to open complaints box -

- | | |
|---|-------------|
| a. Asst. Programme Officer (APO ¹)/Field Asst. (FA) as applicable to be considered as Complaints Handling Officer (CHO) | Team leader |
| b. CDMC Leader ² (of respective community) | Member |
| c. Community Organizer ³ (CO) | Member |

7.2 CRC at Unit Level

- | | |
|--|------------------|
| a. One Unit Executive Committee (UEC) Member (to be nominated by UEC ⁴) | Convener |
| b. Unit Level Officer (ULO) / Program Officer | Member Secretary |
| c. Asst. Programme Officer (APO)/Field Asst. (FA) as applicable to be considered as Complaints Handling Officer (CHO) | Member |

7.3 Roles & Responsibilities

UEC Member – The **UEC Member**, in consultation with Unit Secretary, will provide strategic decisions on specific requests by the ULO upon receipt of the complaint/feedback.

Unit Level Officer (ULO) – The **ULO** will decide on the necessary actions based on the complaints/enquiries received from CHO, which can be either APO or FA as appropriate within the context of the project. He/she will inform the CHO the decisions on the concerns in the IT template/database, who will in turn inform the complainant accordingly. The ULO will ensure integration of feedback from community in the project interventions. In case of further follow up/decision making, he/she can coordinate with the **EC Member** at the unit. He/she will provide updates on the types of complaints and feedback received from the community, as per the report shared by CHO, in the Programme Implementation Committee (PIC) meetings. ULO will update the CDMC leader on the frequently raised concerns by the community and results/actions taken. This can be done through the CDMC meetings.

¹ Assistant Programme Officer (APO) is responsible for organizing all project events at sub-district level.

² Community Disaster Management Committee (CDMC), normally comprised of 16 members from the community who represent all micro groups within the community.

³ Community Organizer (CO) has the overall responsibilities for organizing all project events in the community.

⁴ Unit Executive Committee (UEC), 11 members committee of the unit who are responsible for managing overall activities of the particular unit.

Complaints Handling Officer (CHO) - Assistant Program Officer (APO)/Field Assistant (FA) as applicable will be considered as CHO. He/she will have dual responsibilities. As team leader concerning complaints box opening he/she will be responsible to lead the box opening (in presence of other two members as mentioned in clause 7.1), receive the complaints/feedbacks, record the complaints in an IT interface/database and maintain separate file for non-sensitive and sensitive complaints. The CHO may respond to complaints/feedbacks if the decisions are already known. A fact sheet may be developed to assist the CHO in this regard. As member of CHC (reference clause 7.1) he/she will be part of handling process at unit level and will convey the decision to the complainant.

For **non-sensitive complaints** or feedback, the CHO will forward the IT template to ULO for necessary decisions, copying relevant Programme Officer, IFRC. Once the decision/action is made on the complaint/enquiry, the CHO will inform the complainant the decision or action either through call or meet in person. The response to non-sensitive complaints will be made within 2 (two) weeks.

In case the complaints/enquiries require a decision from the Project team at the National Headquarters (NHQ), the CHO will compile all complaints/enquiries at the end of the week and forward to CHO at the NHQ. *In case the CHO is Field Assistant, the CHO will copy the APO while seeking action points from the ULO.* The follow up actions will be incorporated into the IT template by the CHO at the NHQ and sent back to CHO at the Unit who will inform the complainant the decisions. The CHO at the unit will develop weekly/bi weekly reports and share with ULO at Unit, CHO (NHQ) and CEA Focal, NHQ.

For sensitive complaints, the CHO will record the complaint in separate IT interface/database. Based on the nature of the complaint, CHO will channel to the ULO, who will coordinate with EC member/ Unit Secretary or CHO at NHQ if the case is unresolved at the unit.

In case, complaints are raised against the CHO at the unit or other Project staff such as CO, ULO, communities can directly raise concerns to the EC member/Unit Secretary. If the complainant does not receive a response within two weeks, the complainant can raise concerns directly to the CHO (NHQ). In this case the contact number and mailing address of the EC member/Unit Secretary and CHO (NHQ) will be shared with the community.

Notes:

CHO at the unit will maintain a separate phone with separate mobile sim, which needs to be shared with community. The community can call at this number directly to raise concerns/feedback/questions and CHO can respond to the complainant through this number. In case of call services, program team can decide to open the service on a specific day during office hours. This needs to be communicated to the community beforehand.

While opening the complaints box, CHO (APO/FA), CO and CDMC leader will be present. CHO will collect the complaints enclosed in the envelope. The CHO, CO and CDMC leader will sign on the envelopes and count the number of complaints and acknowledge the count in a registrar. In case the CDMC leader is not present on that day, CDMC secretary will be present. To maintain confidentiality, no complaints will be disclosed after opening the box in the community. The CHO will record the complaints in the database when back at the office. The complaints box will contain forms and envelope for convenience of the communities to write complaints/enquiry/feedback. The box will be opened once a week.

CDMC leader and CO– The CDMC leader will support the BDRCS team and liaison with community for setting and running the CRM. The role includes activities such as - being present while the complaints box is opened, disseminating to communities on how to provide complaints/feedback to BDRCS and informing larger community on the actions/results of frequently made complaints. He/she **will not** handle complaints, such as receiving complaints, investigation, recording and responding to complaints.

7.4 CHC at NHQ

- | | | |
|----|--|------------------|
| a. | CEA Focal Person, NHQ | Convener |
| b. | Respective Programme Implementation Department Director | Member |
| c. | Complaint Handling Officer (CHO), NHQ -Program Manager/CEA Officer | Member Secretary |

If deem necessary CHC will invite technical or any other support from CEA focal person of IFRC. The CEA focal person or his/her nominated representative can be part of the CRM set up process for the interim period to provide consistent support until the CRM is functional and running.

CEA Focal (BDRCS) - will provide strategic advice regarding the performance/operation of the CRM. He/she will review the operation of CRM every three months. He/she will also be responsible to facilitate meetings with Unit and Project team in regard to CRM, drafting ToR, conducting community consultation and sensitization, and training of staff on CRM.

Respective programme implementation department director – will participate in any discussion/meeting of the CHC, provide strategic advice regarding specific complaints/enquiry and on improving the CRM.

Complaint Handling Officer (CHO), NHQ -Program Manager

The CHO will coordinate with the respective programme implementation department Director and BDRCS CEA focal for decisions/advice whenever requested from CHO at the Unit. He/she will inform the decisions on the IT template/database and send back to CHO at the unit. He/she will receive weekly report from CHO at the unit on the types of complaints/feedback made by the communities and make necessary changes in the project interventions. He or she will maintain record of the types of complaints received and facilitate handling process, e.g. convening meetings, placing/referring.

*For **sensitive complaints**, CHO (NHQ) will handle directly after receiving from CHO at the unit and coordinate with the respective programme implementation department Director and BDRCS CEA focal for decisions/advice (refer to Coordination Mechanism flowchart). CHO will inform actions/decisions in the IT template/database and forward back to CHO at the Unit. In case the complaints/appeals are informed directly to the CHO at the NHQ by the complainant, he/she will resolve through coordinating with senior management (SG) and return a response to the complainant. While CHO from NHQ sends back a response to the complainant, CHO will inform the EC member regarding the decision made.*

The CHO will share weekly/bi weekly report to BDRCS and IFRC CEA focal points on the types of complaints for reference and update the performance of the CRM through documentation.

7.5 Other Roles and Responsibilities

7.5.1. Senior management

At Unit level, EC member/Secretary will inform decisions or take actions upon receiving non-sensitive and sensitive complaints from the ULO. The senior management at Unit or NHQ will be engaged to support decision making for sensitive complaints and Appeal Process.

In case the sensitive complaint cannot be dealt at Unit level, CHO (NHQ), will be informed and will be channelled the complaint, who will coordinate with respective programme implementation department Director and BDRCS CEA focal for decisions/advice. The CHC at the NHQ may coordinate with senior management (SG) as necessary. The CHC may also coordinate with others in BDRCS and IFRC program team on decisions or actions on specific issues. To avoid overloading the senior management, their direct operational role should be limited.

7.5.2. PMER

Representative from PMER will join the review of the CRM implementation in the project areas with CEA Focal points and include in monthly/mid-year/annual reporting the trend of complaints/ enquiry received from community and response made.

7.5.3. IFRC Country Office

CEA Focal or CEA Officer - will provide strategic advice regarding the operation of CRM, support in developing the methodology/ToR for the review of the CRM and facilitation of training and other consultations. If required, the CEA focal may communicate with CEA Focal at IFRC Asia Pacific Regional Office or Headquarters in Geneva for necessary advisories.

Project Officer (PO), IFRC – will support the CHC at the unit level in order for the CRM to function smoothly.

Programme counterpart/team at IFRC will coordinate with BDRCS team to compliment the CRM implementation process and funding possibilities from partners/donors.

7.5.4. Partner/Donor

Partners or back donors can add value in terms of legitimacy and options for possible responses and action i.e. reallocation of funds or support for CRM implementation process.

8. Complaints and Feedback through Hotline Number:

BDRCS has established a hotline number, +8801811458524 in its NHQ as another effective way of ensuring its commitment in handling feedbacks and complaints in terms of its activities to its

stakeholders. Every day, from 09.00 AM to 05.00 PM this number is manned by the trained volunteers of BDRCS.

This hotline service is a new activity for BDRCS which adds value to its existing mechanisms of offering practical advice and support to improve its communication, engagement and accountability to people in need. It is launched to support to build CEA in a more systematic, predictable and evidence-based way within the management cycle. This also empowers communities to demand greater transparency and participation.

The basic work flow of this mechanism is highlighted in the following flowchart (figure 2).

Below are the basic steps for this complaints/feedback response mechanism:

- a. The call receiver (trained volunteers and/or CEA officer of BDRCS) will receive the call at the NHQ or at the identified field office(s).
- b. The call receiver will identify whether it's a feedback, complaints or that call was just for seeking information.
- c. If it a feedback or complaint, the call receiver (if volunteers) will pass it to the Complaints Handling Officer/CEA officer.
- d. If it is for 'information' purpose, then the call receiver (in case of volunteer, if required then with support of CEA officer, BDRCS) will collect the relevant information from respective department/unit and share the information with the caller.
- e. If it is 'feedback', then the caller will pass that to the Complaints Handling Officer/CEA Officer and then it will be passed to the relevant department/unit by the Complaints Handling Officer/CEA Officer. Accordingly, an acknowledgement will be given back to the caller regarding successful passing of the information.
- f. If it is a 'complaints', then if it is received by the volunteers then it will be passed to the Complaints Handling Officer/CEA Officer. Then according to the CRM system whether its is a sensitive or non-sensitive complaint that will be identified.
- g. If it's a non-sensitive complaint, then the Complaint Handling Officer/CEA Officer will collect the relevant information from the respective department/unit and pass the information to the complainant.
- h. If it is a sensitive complaint then the Complaint Handling Officer/CEA Officer will pass that to the Complaint Handling Committee.
- i. Then necessary actions will be taken by the Complaint Handling Committee. If they need to involve more resources (including Movement partners) or they need to engage the Management, the Committee will do so to resolve the complaint.
- j. Following that the solution/information will be passed to the caller.
- k. Finally, following the passing of information to the caller, for each call the relevant information/actions taken, will be filled up the database.

It is important to remember that if any complaint ~~can not~~ cannot be resolved within 2 weeks of receiving that complaint, then it is mandatory to inform the caller that BDRCS is taking necessary steps to address that and hopefully within a particular date (to be decided by the Complaint Handling Committee) the final information will be shared with the caller.

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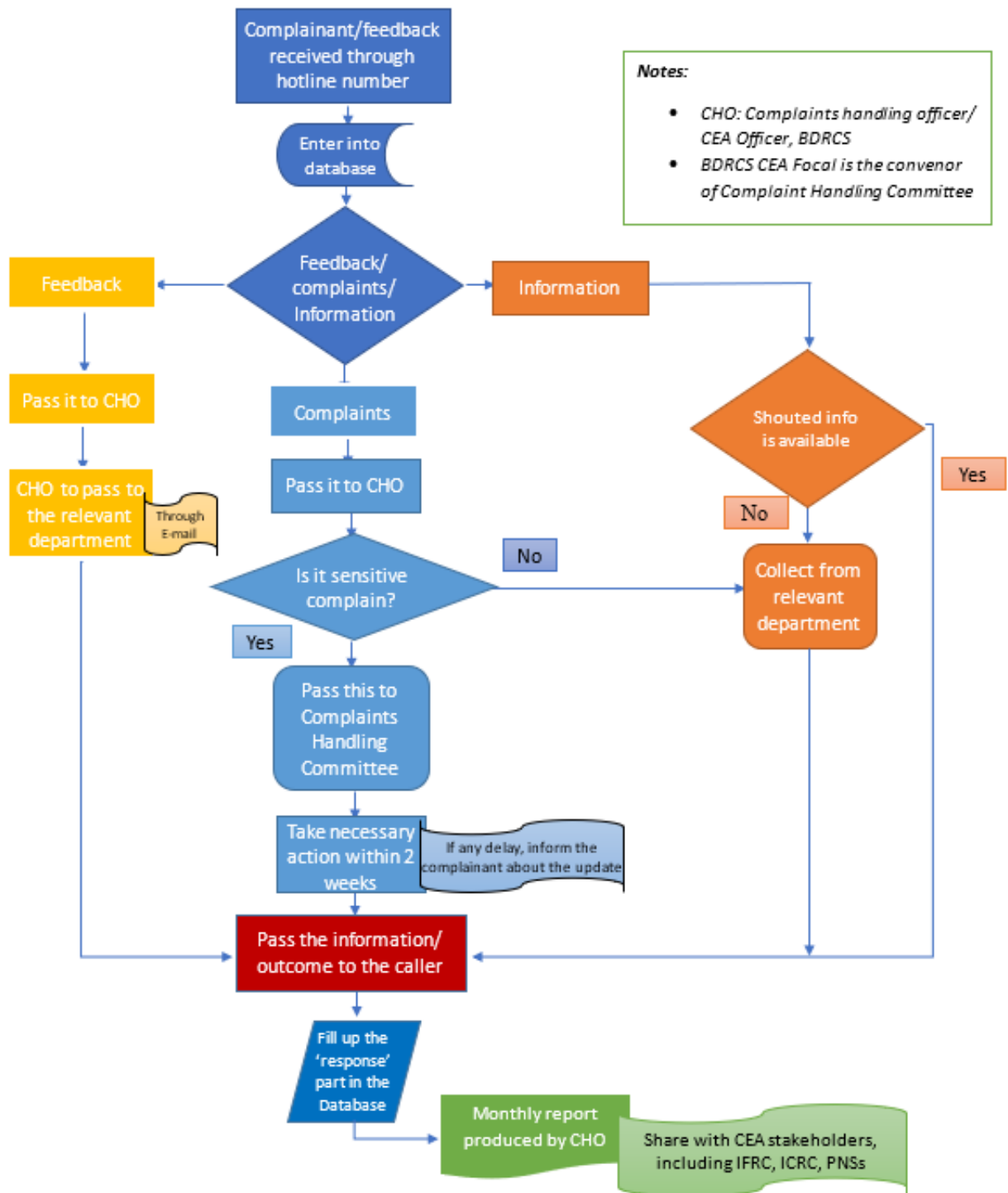


Figure 2: Complaints/feedback mechanism of BDRCS – through hotline number.

9. Appeal Process

If a beneficiary is not satisfied with decisions/actions taken by BDRCS on the specific complaints, he/she will have right to appeal. The complainant will send the appeal to EC member/Secretary at the unit. If the appeal does not receive a response **within 2 weeks**, he/she can send another appeal directly to CHO (NHQ). CHO will forward the appeal to BDRCS CEA Focal for his/her concern and for follow up actions by SG as necessary. In this case, the contact details of EC member at the Unit and CHO at the NHQ will be provided to the community. While CHO from NHQ sends back a response to the complainant, CHO will inform the EC member regarding the decision made.

10. Responding to Complainants/beneficiaries

In case of non-sensitive complaints, feedback or enquiry, the CHO at the unit can be provided with a checklist of answers so that he/she can provide the complainant with a response immediately. Otherwise, the CHO will get back with the response within two weeks' time. In case more time is required, the CHO must inform the complainant of the required time for investigation and respond with the answer within the following week.

In case of sensitive complaints, depending on the nature of complaints, the response to the complainant/beneficiary can be provided from within a week to maximum one month.

(refer to the flowchart for box and call center and coordination mechanism)

11. Reporting

The CHO at the unit will develop weekly/bi weekly reports and share with ULO at Unit and with CHO (NHQ), copy to CEA Focal, NHQ. The summary of the report can be presented in each of the PIC and CDMC meetings by PIC representative/ ULO at the Unit. The summary of the report shall feed into the monthly, half yearly reporting of the PMER for the project at NHQ. The CHO at NHQ will share weekly/bi weekly report to BDRCS and IFRC CEA focal points on the types of complaints for reference and update the performance of the CRM through documentation.

Annex

1. The TEN STEPS
- 2A. Coordination Mechanism-Non-sensitive complaint
- 2B. Coordination Mechanism-Sensitive complaint
- 2C. Coordination Mechanism-Appeal process
3. Templates for complaining
4. Templates for Appeal process

5. Templates for logging (*soft version only*)
6. Templates for reporting