The right to a say and the duty to respond

The impact of complaints and response mechanisms on humanitarian action

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HAP Humanitarian Accountability Partnership

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assurance to disaster survivors, staff, volunteers, host authorities and donors that the
agency will deliver the best humanitarian service possible in each situation.

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Cover photo by Smruti Patel: group of women participating in a HAP consultation,
Maasia, Kenya, November 2009.

Executive summary

"The right to a say and the duty to respond"

Humanitarian accountability is about the 'right' of stakeholders of humanitarian action to have 'a say' and the duty of the providers of that action 'to respond' i.e. take this 'say' into account. This means that both beneficiaries and staff of an agency should have the opportunity to ask questions and give feedback on whatever is important to them and that a response will be provided by the agency. Feedback can take the form of opinions, concerns, suggestions and complaints. Most feedback from disaster-affected people consists of opinions, concerns and suggestions which agencies can adopt, challenge or disregard as appropriate. By contrast, a complaint contains the specific grievance of a stakeholder who is entitled to seek (safe) redress and receive a response.

An integral part of the HAP 2007 Standard in Humanitarian Accountability and Quality Management[1], complaint and response mechanisms (structured context-appropriate channels for disaster-affected communities to safely raise complaints and receive a response) have received significant attention in recent years as part of agencies' efforts to improve accountability and the quality of their service.[2] Yet limited research has been undertaken so far to collect evidence of the effectiveness of these systems and their impact on service provision. To start addressing this knowledge gap, the report draws on a study of views and experiences of staff from four agencies and representatives of communities in Uganda and Bangladesh at locations where these agencies operate; additional interviews with staff from 17 agencies complement the four case studies.

Section 1 provides an overview of what constitutes an effective complaint and response mechanism (CRM) as defined in the HAP 2007 Standard. **Section 2** presents the data collection methods, participants, scope and limitations of the study. In total, 237 individuals contributed to this report, representing disaster-affected populations and staff of HAP member and non-member agencies. **Section 3** details the four case studies and a summary of interviews with staff from the international and/or national offices of 17 other agencies. Each case study presents a description of the existing CRMs as related by staff; communities' understanding of the purpose and function of CRMs; the views of both beneficiaries and staff on the effectiveness and impact of CRMs and, finally, presents communities' expectations and suggestions on how CRMs could be improved. Examining four agencies in detail provided limited but generalisable findings and illustrated the potential for CRMs to positively impact service provision. Some of the results from the case studies are

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[1] For the full text of the HAP 2007 Standard in Humanitarian Accountability and Quality Management go to: http://www.hapinternational.org/pool/files/hap-2007-standard(1).pdf. For the full text of the HAP 2007 Standard in Humanitarian Accountability and Quality Management go to: http://www.hapinternational.org/pool/files/hap-2007-standard(1).pdf. The HAP 2007 Standard is undergoing a review process which will result in the HAP 2010 Standard; for information about this process, please access the HAP website http://www.hapinternational.org/projects/standard/hap-standard/review.aspx or contact Monica Blagescu at mblagescu@hapinternational.org.

[2] HAP member agencies make a commitment to the Principles of Accountability, including "we will enable staff and beneficiaries to report complaints and seek redress safely." HAP certified agencies have successfully completed the quality audit process against the HAP 2007 Standard, which includes Benchmark 5 on complaint handling.

explored further in **Section 4** along with additional findings on the challenges and key considerations in the implementation of effective CRMs.

These findings and considerations are summarised here:

- To be fit for purpose, as well as meeting the detailed requirements in the HAP Standard Benchmark 5, CRMs cannot work in isolation from the other areas addressed in the HAP 2007 Standard, i.e. good management systems; informed consent and engagement of a range of stakeholders in decision making; timely and relevant information provision to staff and communities about the agency's commitments and programmes; staff who have appropriate competencies and embody respect in their attitudes and behaviours towards beneficiaries and others and a commitment to continually reflect, learn and improve.
- Unless power dynamics at community level are carefully considered by the agency, CRMs risk reinforcing existing imbalances by giving more voice to privileged members of the community at the expense of others. To address such risks, agencies need to:
  - consult with different beneficiary groups and their representatives and triangulate suggestions on most appropriate means for raising and addressing complaints
  - ensure that information about the CRM is shared with communities in languages and formats that are accessible to them so that potential users know of the CRMs' existence, their purpose, how they can be accessed, what constitutes a valid complaint and what will happen with complaints once submitted
  - provide reassurance that it is safe to complain, that complaints will be taken seriously, addressed confidentially and without retaliation and that a response will be provided regardless of the status of the complainant in the community
- Cultural and linguistic factors and the local context need to be given due consideration in identifying most appropriate means through which communities will be comfortable to raise complaints.
- While staff knowledge and skills in addressing complaints are important, it is their attitudes and behaviours that will most directly affect communities' confidence in raising issues of concern to them.
- Complaints need to be addressed as close as possible to the place where they are raised but staff need clear agency guidance on how to escalate more complex or sensitive allegations.
- Donor attitude and engagement was also seen to have a role in enabling improved accountability to beneficiaries.
- Leadership and senior management support is essential in creating an environment where staff recognize the value of the benefits of complaint handling firstly, as a means of making concrete the values of dignity and respect for disaster-affected communities through better accountability and, secondly, as a way of strengthening their organisation's performance. This in turn motivates staff to commit to working towards implementation of effective CRMs when work loads are often already heavy.
- Accountability starts at home: staff too need access to a safe and confidential system to raise complaints without fear of retaliation.

- Agencies working with implementing partners face additional complexities when setting up CRMs.
- Preparation for HAP certification provided much needed momentum and real focus at all staffing levels.
- Effective CRMs led to more positive relationships between communities and staff, based on increased trust. Communities felt listened to and reassured of the agency's commitment to resolve issues arising, although more efforts need to be made for communities to raise allegations of sexual exploitation and abuse.
- In some cases CRMs led to improvements in service provision as they enabled staff to identify gaps and issues that required addressing in their operations (such as rectifying beneficiary lists) and provided a new means to test the quality of their programmes as defined by beneficiaries.

Acknowledgements

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1. Introduction

1.1. Aim of the study, research questions, sample size and rationale

The aim of this study was not to assess or pass judgement on any particular agency, but rather to draw on experiences and learning in an attempt to better understand the positive and negative impacts of complaints and response mechanisms (if any) in humanitarian settings, to identify key factors that underpin successful complaint handling and to highlight some of the challenges to establishing effective mechanisms.

This report examines the findings and addresses the following research questions:

- What impact have CRMs had on the lives of disaster-affected populations?
- What impact have CRMs had on the agency's staff and other relevant stakeholders?
- What impact has the introduction of CRMs had on the management (from programme development, to implementation to monitoring and evaluation) of humanitarian programmes?

The report takes into account all six Benchmarks in the HAP 2007 Standard in Humanitarian Accountability and Quality Management with a particular focus on the impact of implementing Benchmark 5, which details the establishment and implementation of CRMs that are effective, accessible and safe for intended beneficiaries, disaster-affected communities, agency staff, humanitarian partners and other specified bodies.[3]

Research material was gathered from 237 participants. Four agency-based case studies were carried out; each of these agencies was currently involved in the implementation of a CRM in either Bangladesh or Uganda. The research visits took place in April and July 2009 respectively. For reasons of confidentiality, these agencies will be called Agency 1 (a partner of a Certified HAP Member Agency), Agency 2 (a partner of a HAP member), Agency 3 (a HAP member) and Agency 4 (a HAP Certified Member). To complement the four case studies, interviews were held with staff from the country office in Bangladesh (April 2009) and Uganda (July 2009) and with head office staff of other agencies, including HAP members (some of which were certified members) and non-members between March and June 2009.[4]

1.2. Report structure

Section 1 defines what constitutes a CRM and includes key requirements from the HAP 2007 Standard. **Section 2** follows with an explanation of the key methods used to collect information, describes the study's participants and sets out the scope and limitations of the study.

Section 3 details the four agency-based case studies. Each case study begins with an overview of the respective agency's main programme activities. A description of the current CRM is presented next, based on discussions with staff; communities' understanding of the purpose and function of the CRM follows. The views of beneficiaries and staff on the effectiveness and impact of CRMs are highlighted in two separate sub-sections. Communities' expectations and suggestions on how CRMs could be improved end the agency-specific case studies. Any discrepancies between the views of different participant groups are examined for each agency.

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[3] As per footnote 2, for the full text of the HAP 2007 Standard in Humanitarian Accountability and Quality Management go to: http://www.hapinternational.org/pool/files/hap-2007-standard(1).pdf.
[4] See section 2.2 for definitions of staff groupings.

Following a similar format as for the case studies, section 3.5 gives an insight into the experiences of staff from the international and/or national office of 17 other agencies in handling complaints and provides a sample of views on the impact of CRMs on NGO management systems.

In **Section 4**, the main lessons learnt from the study participants are laid out alongside challenges and key considerations in the implementation of effective CRMs.

1.3. What is a complaints and response mechanism (CRM)?

Being accountable to beneficiaries requires that humanitarian agencies take account of their opinions, concerns, suggestions and complaints. Most communication from disaster-affected people consists of advice and information, which agencies can adopt, challenge or disregard as appropriate. A complaint, by contrast, contains the specific grievance of a stakeholder who believes that a humanitarian agency has failed to meet a stated commitment. This commitment can relate to a project plan, beneficiary criteria, an activity schedule, a standard of technical performance, an organisational value, a legal requirement, staff performance, or behaviour, or any other point that may have been made by the agency. While responding to feedback may be optional, a complaint requires a response/redress.[5] It is the agency's responsibility to solicit feedback *and* complaints and to ensure that factors preventing disaster-affected populations from raising concerns are minimised and addressed.

HAP member agencies make a commitment to enable staff and beneficiaries to report complaints and seek redress safely.[6] HAP certified agencies demonstrate their compliance to the HAP 2007 Standard, including Benchmark 5 on complaint handling.

The HAP Standard Benchmark 5 states that, *the agency shall establish and implement complaints-handling procedures that are effective, accessible and safe for intended beneficiaries, disaster-affected communities, agency staff, humanitarian partners and other specified bodies*. Specific requirements for an effective CRM are included in the Standard.

The *Guide to the HAP Standard* states that an effective CRM is essential for improving the quality of humanitarian work and should be accessible to, and safe for, all stakeholders. Within any disaster-affected population, large or small, particular groups will be vulnerable to manipulation, exploitation and exclusion and there will be power dynamics at play that impact directly on peoples' opportunity to engage with relief agencies. Therefore, special measures to ensure the inclusion of these groups will be required: for instance particular attention should always be paid to the specific needs of women and children and to their effective participation in consultation processes.

Methods for soliciting feedback and complaints should be culturally and socially appropriate (for example, ensuring that female staff seek feedback from female beneficiaries in circumstances where it is culturally unacceptable for women to talk to an unrelated man) and a variety of channels should be made available for providing feedback and submitting complaints for those who are unable to read, write or

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[5] See The Guide to the HAP Standard for a complete description of complaints handling procedures including the distinction HAP draws between a CRM and a feedback system (pages 79-87).
[6] See the HAP Principles of Accountability:
http://www.hapinternational.org/projects/standard/development/principles-of-accountability.aspx.

articulate their concerns for any other reason (for example, people with hearing or speech impediments, children, different language groups)[7].

Where effectively implemented, it is expected that CRMs are a positive process that can

- safely highlight a concern within a community
- provide a non-judicial, respectful means for addressing grievances
- increase transparency
- demonstrate an agency's humility and commitment to achieving its goals
- protect the dignity of users
- improve security
- provide an early indicator that a process or plan is not working
- provide valuable management information
- highlight cases of fraud, inefficiency, or abuse.

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[7] See The Guide to the HAP Standard (Oxford: Oxfam, 2008), page 80.

2. Method

2.1. Data collection

Information was collected for the study either through focus group discussions (FGD) or semi-structured interviews facilitated by the researcher (and writer of this report); a translator was present where necessary. A list of guiding questions was prepared in advance but every attempt was made to allow the conversation to flow naturally so that interviewee(s) could talk about their experiences in a way that suited their needs.

For all study participants, an explanation was given of HAP, the purpose of the study and of the FGD/interview and how the information provided would be used. It was explained that contributions would remain confidential and that participation was voluntary. An explanation was also given of how to complain if any problems arose in relation to the FGD/interview. Participants were asked to sign a form (for community members and programme site staff) or agree verbally (telephone interviews) to participate in the study under these conditions.[8] In addition, the interpreters were asked to sign impartiality and confidentiality agreements, as well as the HAP Code of Conduct for staff and consultants.

2.2. Acronyms and Definitions

Acronyms

CRM   Complaints and Response Mechanism

FGD   Focus Group Discussion

HAP   Humanitarian Accountability Partnership

Definitions and explanations of terminology

Agency – generic term for established organisation dedicated to delivering humanitarian aid or development projects on behalf of donors.

Community committees – for this report, 'community committees' refer to committees set up by the agency; members all belong to the community and are chosen in consultation with the community. The committees are normally made up of 10 people, including 'respected' members of the community, (such as religious leaders, teachers and so on), mostly men but usually also two or so women. Different agencies had different names for these committees, but for the purpose of this report they will all be referred to as 'community committees'.

Partner/implementing partner – aid agencies deliver humanitarian aid in two different ways: operationally, implementing projects directly through staff or volunteers and non-operationally, providing financial, material or technical support to a partner that implements projects directly through staff or volunteers. Some agencies combine both approaches.

HAP member agency – HAP member agencies make a commitment to the HAP Principles of Accountability, including "we will enable staff and beneficiaries to report complaints and seek redress safely."

HAP certified member agency – HAP certified member agencies have successfully completed the quality audit process against the HAP 2007 Standard, including Benchmark 5 on complaint handling, and demonstrate their continuing compliance to the Standard.

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[8] For more information on the explanation given to participants, please contact the HAP Secretariat and request a full copy of the field guidelines.

Levels of staff interviewed

- *programme staff* – staff working at the programme level but not necessarily based on site and who may have involvement in projects at other sites
- *national (head) office staff vs. international head office staff* – where relevant/possible more specific terms have been used to differentiate levels of national office staff; for the purposes of this report, 'international head office staff' refers to staff from the worldwide head office of an international agency to differentiate from 'national office staff' which refers to staff from the head office of a national agency or the country office of an international agency

2.3. Case studies

Four agencies were the subject of the case studies, two in Bangladesh and two in Uganda. FGDs were conducted with community members and semi-structured interviews were conducted with programme site staff who worked directly with communities and with national office staff, for each agency.

Agency 1 (partner of a HAP Certified member agency)

There were 124 participants in total affiliated to this agency:

- 3 national office staff
- 7 programme site staff (6 female and 1 male)
- 71 community members (44 female, 27 male)
- 13 young men who took part in a FGD. The men ranged in age from 18-39 with five being 18, two being in their 30s and the rest in their early 20s; some were members of the community committees set up by the agency.
- 30 further community members (female) representing an ethnic minority group. Many could not speak (or did not feel confident to speak in) the national language. Every effort was made to take account of all participants including: sitting closer to those who did not/were not confident to speak; translating the questions for them into their own language; encouraging them to speak in their own language and asking others to translate for them.

Agency 2 (partner of a HAP member agency)

There were 64 participants in total affiliated to this agency:

- 2 national office staff of the HAP member
- the head of implementing partner
- 2 programme managers (male), 2 programme site staff (male) and one accountant (interviewed together in their local office)
- 30 community members (female) took part in a FGD. Some of the women had not benefited directly from the agency's programme and during the interviews the group was agitated with everyone attempting to talk at once and make demands for further assistance. A smaller FGD with seven of these women – who were members of the target population – was also conducted proving more fruitful in terms of providing information relevant to the study).
- 17 community members (male of various age groups) took part in a FGD. Among this group, 7 men were very vocal and others contributed less often.
- 9 community leaders (male) interviewed in the agency's programme office. These included a religious leader, a primary school teacher, four volunteer development workers, two businessmen, and a hospital worker. Two of the men were on the community committees established by the agency and others had been involved in making committee decisions, including beneficiary target lists.

Agency 3 (HAP member)

There were 5 participants in total affiliated to this agency. At the last minute, due to strict government controls on access, the agency was unable to allow the researcher to speak with community members. This resulted in semi-structured interviews being conducted only with staff:

- 1 Country Director
- 1 programme manager (male)
- 3 programme site staff (1 female and 2 male).

Agency 4 (HAP Certified agency)

There were 23 participants in total affiliated to this agency:

- 1 Monitoring & Evaluation Officer (ultimately responsible for the CRM)
- 4 programme site staff (3 male and one female)
- 15 community members (9 female and 6 male) took part in FGD. These participants all belonged to one of the beneficiary groups facilitated by the agency and all were members of the host community not refugees.
- 3 community facilitators (2 female and 1 male) took part in a FGD. Facilitators were chosen by the local authorities and were not direct beneficiaries of the programme; they were paid for their work as facilitators. After being trained by the agency, each facilitator was responsible for between two and three groups.

The programme was based on a model of community members forming groups that received support as a collective rather than individually. Group membership was voluntary and self-selecting but in order to receive assistance, one had to be a member of a group. Each group had approximately 30 members; most groups had more women than men and no group had more men than women.

2.4. Additional interviews

Additional interviews were conducted with a further 21 staff from the national office and international head office of 17 other agencies not participating in the case studies.

Semi-structured interviews were conducted during the field visits with national office staff in:

- Bangladesh with the following HAP members: CARE Bangladesh, Concern Worldwide, DanChurchAid (HAP Certified), Danish Refugee Council (HAP Certified), Lutheran World Federation, Muslim Aid, Norwegian Refugee Council, Save the Children UK, World Vision and the following non-members: Caritas Bangladesh, DSK, HEED, and Sangram.
- Uganda with the following HAP members: Danish Refugee Council, Lutheran World Federation, Norwegian Refugee Council, World Vision and the following non-member: Caritas Uganda.

Telephone interviews were conducted with staff responsible for accountability based at

- the head offices of CAFOD[9], CARE International, Concern Worldwide, Muslim Aid, Save the Children UK, Tearfund (HAP Certified) and World Vision International (all HAP members)
- the Kenya and Yemen country offices of the Danish Refugee Council (HAP member).

2.5. Limitations of the research

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[9] HAP certified in September 2009, after the data collection for this study was completed.

This report does not claim to provide a comprehensive overview of CRMs in practice; an in-depth study requires a larger sample, a stronger analytic examination of the mechanisms and greater triangulation of findings. Variations in the humanitarian situation and makeup of the sample in terms of gender, education and experience also limit the generalisations that can be drawn from the study. For instance:

- the operational programmes visited varied from country to country
- In Uganda, the agencies were responding to the ongoing refugee crisis whereas in Bangladesh they were responding to the aftermath of Cyclone Sidr. It could be argued (as it was by the programme staff of one HAP Certified agency) that the situation in Uganda was more stable and manageable than in the Bangladesh programmes; this increased stability had implications for managing effective CRMs. The staff in Uganda had been working with the communities for approximately a year and a half prior to introducing the CRM and they mentioned that it would be much harder to set up such a system in an emergency situation.[10]
- for *Agency 4*, the HAP Certified member, all of the participants in the study were members of the host community (and not refugees)
- All participants had experience of using the CRM. In addition, the interpreter had previously been a staff member who had worked with this community and it is possible that the participants would have felt more comfortable discussing issues with an interpreter that was not known to them.
- for *Agencies 1* and *2* the interpreter was female but for the HAP Certified Agency the interpreter was male. This difference may have hindered female community members from speaking openly on certain sensitive issues.

In view of these limitations, the scope of this study is the compilation of impact perceptions of CRM from a variety of stakeholders, from beneficiaries to implementers to managers to advisers. Collectively, these perceptions provide a good deal of rich and valuable information and from them it has been possible to present preliminary conclusions on the impact different CRMs have on programmes, on what contributes to a CRM working effectively and on what benefits a CRM can provide stakeholders of humanitarian action.

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[10] See section 4.4.3.

3. The case studies

This section presents the case studies, one for each of the participating agencies, and the views and experiences of staff from 17 other agencies that have implemented CRMs.

3.1. Agency 1 (partner of a HAP Certified member agency)

3.1.1 Main activities

During the onset emergency response phase, activities had largely focused on the distribution of relief items (e.g. tarpaulins, food, water and clothing) and on re-construction (e.g. housing). Over the 12 months preceding the study, programmes had been transitioning into development, with relief distribution scaled back and a greater focus on micro-finance, social development and disaster risk reduction.

3.1.2 Staff description of the CRM

Complaints boxes were the main channel for collecting feedback and complaints from the community. Boxes were placed at the agency's programme site office and at relief distribution points in the disaster-affected villages. Those who were illiterate were expected by the agency to ask others to write the complaint or suggestion on their behalf. Notice boards explaining what the agency had done last year and what it would do in the current phase were available next to the complaints boxes. National office staff stated that these notice boards also explained what could be complained about and how to complain, provided the list of beneficiaries and selection criteria, and gave phone numbers that could be used as an alternative for lodging complaints. In a few programme sites, this also included an explanation of the procedures used to handle complaints. Staff at all levels mentioned that beneficiaries could also make verbal complaints to a member of staff.

The purpose of the boxes was explained to communities during meetings: that complaints could relate to the quality of the agency's response, corruption and targeting criteria and that community members could also provide their suggestions for next year's priorities. One programme site staff member maintained that the poor and illiterate were more likely to understand the complaints procedures since the procedures had been discussed directly with them; however, community members did not appear to be aware of these conversations (*see below*). National office staff stated that programme site staff would sometimes use HAP training and guidelines to explain to communities how to set up a CRM and that staff and volunteers were trained in complaints handling, although programme site staff said that they were not familiar with such materials.

The complaints boxes were opened on a regular basis (weekly or monthly) by programme staff along with the community committee president. According to national office staff, when a complaint was received, it would either be dealt with at the programme site level or by an investigation team consisting of senior staff members based at a separate programme site depending on its severity.

3.1.3 Community understanding of the CRM

When community members were asked how they could raise complaints, a mixture of views was expressed. Most men and some of the women[11] knew that they could submit a complaint using a complaints box, although the majority did not understand the complaints handling process. The vast majority of women and a minority of the men did not know of the boxes or of any other options for raising complaints. These same men said that only those "*with more power*" in the community would know

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[11] Throughout the report, 'men/man' and/or 'women/woman' refer to people from the majority ethnic group, unless otherwise stated.

about the boxes rather than the majority of people in the village. Some others recalled being given a phone number of the area manager to contact with any complaints. The understanding of the women from the ethnic minority group was that complaints or concerns were to be raised during weekly meetings that took place with staff.

In the FGD with young men, all participants claimed to know how to use the complaints boxes. This group also believed that complaints could be discussed directly with staff either in the agency's local office or when staff visited villages.[12] There was consensus among the young men that the agency had informed the community committee about the CRM and that it was the committee's responsibility to share the information with the rest of the community. They felt quite certain that everyone knew about the CRM as they had discussed it in their communities and believed that, if people saw a 'strange' box in the village, then they would ask about it.[13]

When study participants were asked about the type of complaints that could be raised, those who had heard of the complaints boxes said that they could only complain about fraud, corruption and bribery. It was the group of young men that seemed to be best informed, stating that complaints could be raised with respect to any problems related to the agency's programme. A few of the young men said that staff had developed the CRM after consultations with the community committee. All of the other FGD participants said that they, and to their knowledge nobody else in their community, had been involved in establishing the CRM. None of the interviewees had been asked, or had heard of anyone else being consulted on improving the CRM.

3.1.4 The effectiveness of the CRM

Community views

Only in the FGD with the young men was there a consensus that the CRM was effective. Women from the ethnic minority group believed that the biggest problem with community meetings was the language barrier; meetings were conducted in the national language and half of the women interviewed stated that they were not confident enough in their abilities to communicate effectively in that language. One woman said: "*People do not know how to ask questions, they don't know how to articulate things, their mouths cannot* bloom.*"*[14] They felt uncomfortable about recording their complaint in writing and using the complaints boxes, seeing this as "*leaving something permanent*". In addition, these women expressed little confidence in receiving a reply: "*who knows whether we would receive a response?*" During the course of the interviews, examples of unrecorded grievances were mentioned, including the fact that the services provided did not meet existing needs and that some male staff looked 'inappropriately' at some women.[15]

Women from the majority ethnic group said that, apart from not really understanding how to use the boxes, they were effectively denied access because the vast majority of them were illiterate. Even those who were literate felt that they could not express themselves properly in writing which left them feeling ashamed; as a consequence, they encouraged each other *not* to use the complaints boxes. They also stated that

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[12] Many of these young men were members of community committees which may explain the apparently high relative familiarity with the CRM.
[13] Furthermore, this group stated that staff from the national office had visited at the beginning of the emergency response, a time when people were anxious and tense; to explain that people could complain using these boxes and that staff would also explain the CRM at monthly meetings that were held for all community members.
[14] This was plainly apparent in the FCD conducted in the national language.
[15] Male members of the majority group also looked at these women inappropriately and in a manner that left them feeling uncomfortable

they were fearful of making a complaint, worrying that others in the community could get angry with them.[16]

The women who knew about the complaint boxes felt that they *were not allowed* to complain about issues other than fraud, corruption and bribery complaints and that other complaints would not be accepted. Women from the ethnic minority group said that they had never thought to complain about sensitive issues such as sexual exploitation and abuse. One woman told us, "*powerful people don't care about it, people don't listen to us*". It is important to note that the women were not unwilling to discuss this topic but they felt that they could not raise this issue with the agency given that the agency had never spoken to them about sexual exploitation and abuse and that complaint boxes were an inappropriate channel to raise such an issue. As one participant said, "*we could not write down things like 'they look at my breasts and it makes me feel uncomfortable' let alone ask somebody else to write this for us!"* It was also commented that having mainly male staff did not help: "[laugh] *how can you raise these issues with men?*"

For different reasons, the apprehension that these women expressed about complaining was echoed by the men who explained that, living in an area prone to disasters, they had to rely on the services of aid agencies and did not want to jeopardise that relationship; complaining to the agency might lead to the agency no longer providing assistance in their community, so "*we considered our future*".

Among the community men, the majority felt that the complaints boxes did not work effectively, stating that written complaints were collected too late, the process was not understood and responses were either late or lacking. They argued that verbal complaints to agency staff were more likely to lead to results, although they pointed out that community committee members had better access to staff and these members "*manipulated things*". When questioned further, it transpired that their negative views on complaint boxes came from the perception that the programme manager (also in charge of the boxes) was, as one man put it, "*not a responsible person*"; having faith in the CRM required having faith in the programme manager.

A further barrier to the use of the CRM stemmed from the community committee; according to a number of interviewees, the community committee told them not to use the complaints mechanisms since they (the committee) knew what further assistance the community required and they would take action. As one man stated, "*this is the way they stopped us*".

Rather than giving people a voice, the complaint boxes seemed to serve as a reminder of how little they felt their opinions were valued. Participants said that in order to complain, they would also need to feel confident that a response would be received and that complaints would be dealt with on a frequent and fair basis.

Programme staff views

When asked about the effectiveness of the CRM, programme site staff proved the most critical of all interviewees. They thought that the complaints boxes could potentially benefit the programme but they did not think that their potential had been unlocked. These staff members foresaw many challenges in implementing an effective CRM. Concerns included: the probability of complaints arising due to the agency not being able to provide service to the whole community; the length of time it was taking to verify whether people really were eligible for support, resulting in a number of false complaints; that responding to a complaint would often take too

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[16] During the FGD itself, some participants responded to this contribution by shouting at the women.

much time; limited transportation making it hard for staff to travel and investigate the complaints.

Although the agency had ongoing programmes and the complaints boxes were still in place, some staff reported that these were no longer needed as "*we are no longer in a crisis*".

3.1.5 Impact of the CRM on service provision

The young men interviewed perceived the CRM as a way of increasing staff awareness of their responsibilities and accountabilities. They considered that staff "*knew that they would be fired if they did not do a good job*". However, most community members reported that the CRM had made no discernible difference – positive or negative – on the attitudes and/or behaviours of staff or on the quality of service provided.

In contrast, most staff members expressed the view that with the introduction of CRMs they were doing a better job by listening and responding to the community. Programme site staff felt that the community was listened to much better than before. One stated that "*people who were afraid to come to the office to complain can now do so using the boxes*". Another said "*it makes us happy* [to know that we are responding]".

Both programme site and national office staff felt that the CRM had affected the quality and relevance of their work by enabling them to prioritise those most in need or ensuring that the right people were being targeted: "*given that there were insufficient resources to reach all families, the suggestions received in these boxes helped us identify new people that needed support*". However, the complaints received sometimes left programme site staff feeling demoralised as they knew the limits of the support being provided.

Although the mechanism allowed the agency to identify new beneficiaries, programme site staff felt it did not affect them in their day-to-day activities in any other way. At the national office level, on the other hand, staff said CRMs increased the credibility of their agency with government and other NGOs as well as with donors.

3.1.6 Community expectations and suggestions for CRMs

In order to establish the communities' views on means of continuing improvement to the programme's complaints handling, interviewees were asked for their thoughts on what an effective CRM might look like in their particular context.

Interviewee expectations were that a lot of time and effort were required to build sufficient trust before any CRM would work efficiently. They also believed that a trusted mechanism would improve the work of the agency. The ethnic minority women saw an effective CRM as a tool which could make the agency more responsive to their needs. The men from the FGD said that it would help the agency provide a better service; the ethnic majority men stated it would help the agency deal with corruption and give the agency a "*very good name*" and the young men thought that it would improve targeting and would make staff take the community more seriously because "*staff would feel they had to respond to the community*".

With regard to suggestions, there was a general feeling that they needed to understand what services they should expect from the agency in order to reduce the difficulty of making a complaint.

Most suggestions related to the channel through which complaints are raised rather than the way in which the agency itself handles the complaints. All participants said that they would prefer to talk to someone about their complaints. As one man put it "*If we write something, it just stays there on a piece of paper; if we talk, then people have to listen*". They also wanted complaints to be actively sought by the agency

rather than passively received; they wanted someone to come and ask them about the quality of services and behaviour of staff. The ethnic minority women stressed that this person would need to explicitly raise issues of sexual exploitation or abuse since they would be unlikely to spontaneously discuss them otherwise. All women interviewed suggested that this person should be female and ideally someone from outside the community. As one woman stated, "*after a while a local person would become proud and no longer listen*". In addition, they would like to have the option to change the selected person if they felt that they were no longer taking account of their concerns.

All participants thought complaints ought to be raised at regularly held meetings with the men and ethnic minority women stressing that *all* community members should have access to speak at the meetings. They also noted that community meetings of this sort would need to be arranged and managed carefully. As one man argued "*Some people can communicate well with the agency because they are rich, but because I am poor I sit still in the group and I have no voice*."

A further suggestion frequently made in the FGDs held with men was that, when complaints boxes were the main channel through which complaints could be raised, they would be more likely to be trusted if opened by staff working in a different geographical area or a trusted senior manager in the agency. It was stated that someone directly involved in the service delivery should not open complaints boxes. Other alternatives suggested were to provide a phone number or an e-mail address or to have access to people higher up in the agency. Interviewees were also very clear about the need for the agency to focus on responding to complaints. One member from the FGD with the young men suggested that some "*honest and educated community members*" [should be part of the team responsible for the boxes, so that] *if a complaint was being made against a member of staff it could not be hidden by the agency*".

Finally, the programme site staff pointed out that, to their knowledge, there was no specific policy or procedure available to *them* to make complaints. Instead they could talk to their line manager, or if needs be, to the head of their organisation.

3.2. Agency 2 (partner of a HAP member agency)

3.2.1 Main activities

During the initial emergency and relief phase, the main activities included the provision of credit for house construction and the provision of power-tillers for crop production. This transitioned into relief distribution of items such as food and clothing, the provision of materials to build housing and slabs for latrines, fishing boats and pond cleaning. At the time of the interviews, the agency was focused on micro-credit and cash for work (road construction).

3.2.2 Staff description of the CRM

Staff interviewed explained that the community could make complaints by using the designated complaints boxes (placed in the agency's offices), by raising issues directly to the community committee or telephoning staff (although people who phoned were asked to first talk to a community committee member). These options were explained on posters in each of the villages involved in the programme. Boxes were not placed at the local level as, on the basis of past experience, staff members felt that communities did not like this and that they preferred to approach the community committee or staff directly.

Each complaints box would be opened on a weekly basis by the complaints committee comprised of two people from the community committee and one staff member from the partner agency (in this case, it was the HAP member funding the programme).

3.2.3 Community understanding of the CRM

In the FGD, only one woman had heard of a complaints box available in town. The other women were unaware of the box or of any other options for raising complaints. All women (bar one who said a 'foreigner' had once come to talk to them about complaining) stated that no one had ever explained to them how to complain.

The men said that they could use a phone number to raise a complaint. The men stated that the phone numbers were provided on the target beneficiary list that was publicly accessible in the village but pointed out that there was no mention of to whom the phones belonged or what would happen with the complaint. Participants from neither the male nor female FGDs were sure of the criteria for lodging a complaint.

All community leaders were aware of the complaints boxes, phone numbers and visiting the local office as options for lodging complaints. It was also their understanding that posters explaining the complaints boxes and phone numbers had been displayed in publicly visible places[17] (e.g. shops, restaurants, hotel, schools, beside main roads, in religious buildings, in the bazaar) and that these had drawn a lot of attention.

None of the participants were aware of any member of the community being involved in the decision-making process with respect to raising complaints nor did any participant know the procedure after a complaint was raised. Furthermore, no participant had been asked or had ever heard of anyone else being asked to provide feedback on the CRM.

3.2.4 The effectiveness of the CRM

It was apparent from the FGDs, with both women and men, that the CRM was not considered as effective. The women said there was a general lack of knowledge about the agency – who they were or what they did – which made it difficult to know what to expect from them, how to reach them or what issues to raise. As one woman reasoned: "*If [name of agency] told us, then we would know what services we can expect.*"

In contrast, the community leaders' group said that the mechanism worked well in meeting the needs of the community. For this group, it was not the channel through which complaints could be raised that mattered, rather the fact that they had faith in the head of the agency; participants from this group stated that people felt comfortable with him, communities trusted him because he had taken action about complaints in the past and staff would be unlikely to misbehave because they knew that action would be taken if they did so. As one participant commented, "*he is a strict man who can be trusted*". This group thought that women would most benefit from having access to a CRM. They also felt that the women would happily make a complaint to the head of the agency. One participant said: "*We encourage them to phone him. In the past years things have changed; women are more confident now and are willing to speak.*"

The community leaders' group felt that the agency would take issues of sexual exploitation and abuse and of corruption seriously – they knew of instances where this had happened, although this knowledge does not seem to have been shared by all members of the community. The men's group felt that these issues could not be complained about directly, stating that they would more likely go to the local authority or a respected member of the community as opposed to the agency. One man said: "*If we went to [name of agency] they wouldn't listen to us but they would listen to a*

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[17] None of these posters were visible when the interviewers visited the villages. It is possible that they had been taken down since the relief distribution had come to an end.

respected person. So if we had a complaint we would go to the local politician or the headmaster or a respected person."

Faced with the same question, programme site staff agreed with the FGD of men and women that the current mechanism was not very effective. They said the short life cycle of projects (five months) within the programme left an insufficient timeframe for the community to become habituated to such a complaints-handling system. They also talked of insufficient training in order for them to roll out an effective CRM. One staff member expressed concern over the types of complaints received and the frequency of similar complaints, stating: "*Allegations during relief distribution are very common. Unless you give 100% coverage you will always get complaints*".

3.2.5 Impact of the CRM on service provision

No community participant in the FGDs expressed the view that the CRM had made any difference – positive or negative – to the quality of service provided and none of the other community members interviewed believed that the CRM had any effect on staff attitudes and/or behaviours.

At the programme level, staff said the CRM *had* helped them better understand the various community dynamics and, as a result had enabled them to address better some confidential issues. They reported that the CRM had allowed them to deal with corruption in the community and gave several examples, including one of community members pretending to be staff so as to extract goods from intended beneficiaries. In this instance, a member of the community telephoned the agency to check whether these individuals were actually staff, which allowed the agency to act quickly.

A senior manager from the national office of the HAP member agency felt the CRM impacted positively upon their own staff as well as the partner's. He stated that "*It has made us more conscious of what we do!*" and that it helped programme site staff improve their communication with intended beneficiaries and the wider community.

On the downside, most staff of *Agency 2* and its HAP member partner indicated that the CRM sometimes left them vulnerable to receiving complaints that either they were not in a position of authority to deal with or were unfair and that dealing with false allegations increased their workload and negatively affected their daily activities and their relationship with the community: "*it makes us sad when people make false allegations.*"

3.2.6 Community expectations and suggestions for CRMs

In general, women felt that a properly functioning CRM would make them feel a part of the process and listened to, resulting in a stronger relationship with the agency; the men focused the discussion on their expectation that an effective CRM would assist the agency in better understanding the needs of the community and be in a stronger position to respond to them. One participant said, "*If they listened to us, then we would listen to them.*"

In terms of suggestions, the men wanted the agency to explain to them how to make a complaint and describe the process and procedures involved while both FGD groups mentioned that, in order to complain, they would need to feel confident that complaints would be addressed on a frequent and fair basis and that a response would be received. When asked what sort of CRM would best suit their context, the FGD of women wanted one that highlighted the agency's purpose and mandate, promoted information sharing and detailed acceptable complaints. One woman said "*They should come to us and call all of us. We would talk to them, they would talk to us and then they would understand our pain and suffering but we would also know what they have and how they treat us. If we can talk freely with them then it would make our hearts light. Otherwise, if they come and don't talk to us we have all this confusion about their work and their services*".

Some also suggested that having a member of their family on the community committee would ensure that their views would be heard by the agency. However, all the women seemed to have little faith that any such opportunity would arise. "*We have no power; we have to depend on Allah*". This pessimistic outlook was echoed by one member of the FGD who summed-up the group's shared views in saying that "*There is no rule or law saying that NGOs have to talk or listen to communities and so NGOs do not. If such a law existed then things might get better*".

3.3. Agency 3 (a HAP member agency)

3.3.1 Main activities

Agency 3 is involved in two main aspects of relief work; the first being the provision of information to help establish durable solutions and increase human rights awareness for refugees being repatriated (including information on security, social services and livelihood opportunities), and the other being the provision of legal aid and counselling (for issues including land and property rights, custody rights, imprisonment, official documentation and social security contributions). The work is carried out in collaboration with a sister project across the national border, which involves staff from the sister project collecting and documenting information required by those being repatriated.

3.3.2 Staff description of the CRM

Target populations are encouraged by staff to submit complaints either in person – to agency staff during Q&A sessions in community information meetings[18] or during one to one sessions with individual community members (the agency staff are 'on the ground' three days a week so communities can access them with ease) – or through a phone call or in writing to the office. In addition, impact assessment surveys were carried out bi-annually and community members could raise issues during these processes.

Once a complaint is received, it is cross-checked to verify its legitimacy and an investigation conducted. Depending on its severity and on what/who the complaint was about, it is either dealt with immediately by staff on the ground or the complainant is asked to write it down so that it could be "*taken further up the management chain*" or it is referred to another agency (e.g. another NGO, UN body or local government) that could more appropriately handle it. For complaints about a breach of staff code of conduct, a formal investigation procedure would be conducted with all aspects i.e. the complaint, the investigation and the response documented. A response is made, although not necessarily communicated directly, to the complainant(s).

3.3.3 Community understanding of the CRM

Since no communities were met for *Agency 3* (see section 2.2 above) no information can be provided as to their understanding and experience of the CRM.

3.3.4 The effectiveness of the CRM

The majority of staff had a relatively detailed understanding of the mechanism, possibly since they had been consulted in its development and implementation. Designated members of staff (male and female) who were nominated by their peers in *each programme* area were the first port of call for complaints. The CRM operated in addition to the normal grievance procedure, which staff did not find sufficient to handle issues such as allegations of fraud or sexual exploitation. Moreover, a number of staff expressed the view that non-programme staff (such as cleaners, drivers, kitchen staff or guards) were unlikely to feel that they could access the usual grievance mechanism and having a parallel CRM was required.

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[18] These are meetings where activities to be conducted are explained.

Generally, programme site staff felt that the mechanism had worked well when it was first set up, but noted that it had been difficult to maintain; for example, when the designated staff left the agency their CRM tasks were not always assigned to a new staff member. In its original form, however, they had been confident that it could deal with all issues – including sensitive ones – and that satisfactory responses would be received.

3.3.5 Impact of the CRM on service provision

Comment as for section 3.3.3 above

3.3.6 Community expectations and suggestions for CRMs

Comment as for section 3.3.3 above

3.4. Agency 4 (a HAP Certified member agency)

3.4.1 Main activities

The main activities for this agency are training in modern agricultural practices to enhance food security, allocation of grants and provision of seeds and livestock. The agency also carries out community development work including improving local government planning processes, disaster risk reduction, sensitisation on gender issues, HIV and the environment and cross-border repatriation processes.

For all the projects run by this agency, community members (both the intended beneficiaries and others) were invited to form community groups made up of approximately 30 people, with membership being entirely voluntary. Each group would nominate a leader and had a designated community. The community facilitator would be a member of the community, trained and paid by the agency. A facilitator was a part time job, with most facilitators seeking their livelihoods from other sources. Plans for project activities were decided in conjunction with and approved through these groups.

3.4.2 Staff description of the CRM

All staff members were clear as to the CRM's purpose and processes. In their descriptions, they emphasised the strong dissemination of publicly accessible information. The information covered included: the focus of the agency; its operational sites; the demographics of the target populations; the programme activities in each location; budgets[19]; the agency's expectations of intended beneficiaries; and what the programme beneficiaries should expect from the agency.

Staff members talked about the various means through which the CRM was disseminated to communities, including: discussion with government officials; discussion with and training of local authorities, local leaders and community facilitators expected to disseminate information; radio talk shows; community meetings and pamphlets and posters circulated in public places (e.g. local authority offices, market place, etc). Information on the CRM included an explanation of accepted complaints, how to register complaints, what would happen to the complaint and how responses would be delivered.

According to staff, when an individual (or a group)[20] from the community had a complaint, the community group would discuss the complaint first. If the complaint

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[19] It was noted that budgetary information often had to be rough estimates, since the way that funds are dispersed by donors made it difficult to break this down to individual districts. However, the amount of money available to each group would be specified. In addition, all aid agencies are obliged to share their budgetary information with the local authorities, who make it publicly available.
[20] Programme site staff held that complaints had to come from the group as a whole, whereas senior staff stated that complaints could also be received from individuals.

could not be resolved at this level, a written complaint would be raised with the local offices of the HAP certified agency by a member of the group or given to the leader of the local authority to be shared with the office. Complaints could also be raised during regular community meetings. Once a complaint reached this level, the complaints handling procedure followed a very strict policy, which all staff described similarly. A complaints handling committee – consisting of the agency's monitoring officer and some senior staff – would investigate the complaint, usually by talking to the group and, depending on the complaint, to other relevant stakeholders (such as the individual being complained about). Although most complaints were handled at the local level, more serious complaints would be communicated to the Country Director who would decide upon the composition of the investigation team. The investigation team always had equal numbers of women and men. Once the investigation team reached a resolution, a written response would be given to the group that filed the complaint; if the group were satisfied with the outcome, they would affirm this in writing and one copy of this agreement would be kept by the group and another by the agency. If the group were not satisfied with the outcome of the investigation, an appeal could be made and a further investigation would take place.

3.4.3 Community understanding of the CRM

All community members interviewed understood the CRM similarly to that described by the agency's staff. During the FGDs, both men and women added that a written acknowledgment would be sent by the agency, confirming that a complaint had been received, alongside an explanation of the investigation procedure.

Community members were provided information on the CRM from the community facilitators (trained by agency staff) and during meetings with the agency staff. None could recall having seen the posters or pamphlets, although the participants from the FGD with men all recalled having heard of them. Facilitators had also been trained in group dynamics and group leadership which gave them the necessary skills to resolve some issues internally without the need to always submit a complaint to the agency.

The community participants were able to specify in some detail both acceptable complaints and those that the agency would not respond to; for example, the quality and quantity of distributed goods could be questioned in a complaint whereas the agency's requirement of community participation could not. Also, complaints could be raised against facilitators, staff members or group leaders not appearing to fulfil their obligations. However, no participants spontaneously mentioned complaints relating to sensitive issues. When this question was asked in the FGD, women and men held mixed views as to whether they would use the CRM to complain about sensitive issues; some stated that they would do so only after the agency explicitly spoke to them about such issues. Others felt confident to complain about bribery, fraud or corruption. However, there was unanimous agreement that sexual exploitation or abuse allegations would be handled by existing community structures and/or the legal system and that they did not expect the agency to resolve these issues.

3.4.4 The effectiveness of the CRM

The CRM was seen as an effective and positive addition to the programme. Community members believed that having a CRM, along with the general approach of the agency, empowered them although perceptions of the number of complaints differed: "*It's demand driven – [the agency] don't impose things, but rather they go to [the community] and offer suggestions for what they can offer and then the group decide what they want, as well as what they themselves are willing to contribute. Then [the agency] delivers. Complaints are few because the beneficiaries decide themselves what they want, so they will have less to complain about.*" (Community facilitator) which contrasts with the opinion of another (male) participant on the frequency of complaints: "[the agency] *has given us the green light to go and*

complain, unlike other organisations. This means they will solve our problems. We know a lot of people who have complained".

One criticism raised by both women and men was that the mechanism did not attribute culpability; they referred to a specific example where although a satisfactory resolution had been found for the complaint, the complainants had been left feeling "*bad*" because it was not made clear to them that they were in the right. In addition, whilst confidentiality might be maintained by the agency investigating the complaint, those interviewed as part of the investigation process were not required to maintain confidentiality and this was seen as having implications for all those involved in the complaint. Nevertheless, participants still felt that they would use the CRM.

Participants from the FGD with men highlighted the challenge of lodging a complaint when that complaint involved members of the complaint committee; as one man said "*The complaint would be seen by those we are complaining about so we do not feel we can do this. It would be better if we could complain to someone else.*"

The women saw men as more likely to raise complaints than women as it was their "*role in society*". As one woman put it "*Even in sharing the produce of the group, men will take a larger share*".

3.4.5 Impact of the CRM on service provision

Community members maintained that the CRM helped them resolve issues as they arose. They also asserted that staff monitoring visits had improved and that staff were increasing follow-up activities. One man said: "*Without the CRM, the service delivery would not be the same. Staff could give us poor quality [inputs], facilitators could provide a poor service and staff would not do any monitoring*".

Community members also saw the mechanism as strengthening their role in the relationship with the agency; one man stated that "*Staff now know that if something goes wrong they will be held to account; they have to be careful. It makes us feel like we have a voice and are listened to*".

Community facilitators noted that the CRM had given the community more self-respect and had improved trust in the agency. There was better co-ordination now between facilitators because, if a problem arose, there was a set procedure for dealing with it: "*it increases transparency and accountability*". The facilitators' "*closeness*" with the groups also increased, as did their performance, since they knew that not delivering on the job could lead to complaints.

In general, staff also considered that the CRM improved their performance and helped them to assess their performance in meeting the needs of intended beneficiaries. As a result, they believed that their service delivery had improved: "*Our success in this programme is very much down to the complaints and response mechanism. It has increased our transparency and opened us up to beneficiaries.*"

Programme site staff felt that communities had more confidence in them after the CRM was established. One staff member said: "*Our approach has always been participatory but the complaints and response mechanism helped strengthen this because people are more likely to tell us where we are going wrong. It allows them to demand participation. It's a confidence-building thing. It reduces the gap between the facilitators and their communities.*"

Staff also saw CRMs as an incentive to do a good job: "*If I know someone can complain about me then I will make sure I do a good job. It's a self-development mechanism for all of us*". They also suggested that the CRM had empowered the community to make others – such as their leaders and local government – more accountable. As one staff member said, "*communities now know their rights*".

3.4.6 Community expectations and suggestions for CRMs

All members of the community who participated in the study were positive about CRMs and their potential for impact. Participants suggested that they would prefer to complain about issues relating to staff to someone totally independent. One man commented: "*It's hard to complain about staff because the staff consider themselves as family, so you would never know if the member of staff you complained to was friends with the member of staff you were complaining about*". They suggested that these complaints should be received by either a member of staff not related to the programme, staff from another organisation, or a member of the community who, as one woman put it, "*is tolerant, listens, and is caring*".

3.4.7 CRMs for staff

Programme site staff reported that, to their knowledge, there was no specific policy or procedure available for them to raise complaints. They were aware that a policy was being developed and agreed that a CRM for staff was necessary if the agency was to improve its accountability and were keen to see this in place. As one staff member said "[Without an internal CRM] *staff would bring out issues in all sorts of other ways which was unhealthy and caused problems with our programmes. If people pile up complaints, when they come out eventually it is all out of hand. Having a complaints and response mechanism for communities really helped our programmes. The same would be true internally.*"

3.5. Presentation of material from supportive interviews

The section below draws on interviews conducted with staff from the national office and international head office of 17 other agencies not participating in the case studies. The interviews focused on outlining staff experiences of CRMs and perceptions of the impact of CRMs on humanitarian and development programming. Where relevant, reference is made to whether the agency was a HAP member, a HAP certified member, or a partner of a HAP member or HAP certified agency. Material from interviews with national office staff is presented first (3.5.1-3.5.4) followed by material from interviews with international head office staff (3.5.5-3.5.7).

National office staff interviews

3.5.1 National office staff: descriptions of CRMs

Staff from the majority of HAP member agencies and one non-HAP member described their CRMs as being similar to those of *Agency 1* and *Agency 2*, i.e. having complaint boxes, face to face meetings and the use of the telephone as the main channels through which complaints can be raised. Most agencies, including the non-HAP members reported that they were still in the process of building systematic CRMs into their programmes and management systems; this meant that decisions were pending as to at which management level the complaint needed to be dealt with – local, regional, national office or (for international NGOs) international head office. Generally, the intention was for complaints regarding targeting, the objectives of the project or programme, the guiding principles behind ways of working, etc to be dealt with at the local level. Complaints relating to staff conduct, for example sexual exploitation or anything regarding zero tolerance policies or codes of conduct would be taken to a higher level. If the complaint needed to be dealt with at the regional level then the investigative team would be comprised of regional office staff from a different region than the one in which the complaint originated. Investigative committees would seek the necessary facts to verify the complaint and produce a report with recommendations about what action was required. These more formal systems were usually being developed at the head office level with input from country offices.

A few agencies (both HAP members and non-members) mentioned 'codes of conduct', 'zero tolerance' or 'fraud and corruption' policies, which all staff had to sign.

These were primarily aimed at dealing with staff misconduct (e.g. fraud, bribery, sexual exploitation or abuse). Specific procedures for reporting, investigating and responding to complaints were outlined within these policies, including disciplinary action to be taken if the complaint was verified. However, information about the policies was not systematically shared with communities.

There were also a few variations to the complaints box/phone number/talk to staff model. One HAP member agency had established complaints desks as a main channel through which complaints could be raised; these were managed by agency staff at distribution sites, with loudspeakers to announce their purpose and function. Another agency used a member of staff or a community volunteer to act as a focal point for complaints within a particular programme. This programme was aimed at children and it was felt that children would be less likely to complain if it was not to a person that they trusted. Similarly, staff from a non-HAP member agency argued that complaints boxes did not work, "*raising complaints is all about who you can confide in*". Instead, they held community meetings where people could raise their concerns, because, as the staff member put it "*this is the best way to hear complaints*".

One interviewee, from a partner of a HAP certified agency, said their agency had no formal complaints system since they involved communities in decisions about *how*, *where* and *what* to include in their service provisions which reduced the need for CRMs and they also promoted the view within communities that complaints were welcomed and could be raised in person with programme site staff, over the phone or in writing and that sensitive issues in particular were taken very seriously.

3.5.2 The effectiveness of the CRMs

All national office staff agreed that their current mechanisms required further work to be properly effective and compliant with the *2007 HAP Standard in Humanitarian Accountability and Quality Management.*

Staff from several HAP member agencies stated that beneficiaries would not complain about sensitive issues, in particular sexual exploitation and abuse allegations. As one member of staff stated, "*if these things get out then the future of the family or of the girl would be ruined*". The general belief was that a huge amount of confidence in the system would be required (and absolute assuredness of the confidentiality of such a complaint) for such a complaint to be made. Staff from a HAP Certified Agency put it this way *"People will think it is their problem – 'I've done something wrong'. They also don't think they will be believed… There is a lot of domestic violence here…sexual harassment will happen at school and in the home – you can't trust anyone. If you can't trust the people you know, why would you trust an aid agency? I'm not sure what we can do about this."*

A further suggestion they made as to why complaints of a sensitive nature proved challenging was that some staff (including, and in particular, programme site staff) did not understand the different procedures for sensitive complaints against agency staff and sensitive complaints raised against a member of the community. There was some confusion, for example, why cases of sexual exploitation and abuse of beneficiaries by staff should be raised with the employer of the staff, while abuse cases perpetrated by a member of the community[21] would be raised using the local legal system; the majority of respondents shared the view that, given the seriousness of sexual harassment – or other forms of abuse or exploitation – these should be dealt with through public channels rather than by an aid agency. As many community

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[21] From the perspective of HAP members and the Secretariat, such a distinction is important because agencies are expected to receive and respond to complaints made about issues under their control, whereas they cannot be expected to receive and respond to complaints about issues not under their control, such as the misconduct of community members. It is possible that this distinction had not been fully explained to, or understood by, all staff.

members and staff had reported, "*this is a police issue or would be dealt with through local structures and mechanisms.*"

3.5.3 Impact of the CRMs on service provision

Some said that having a CRM had led to changes in staff attitude and behaviour, (including of those of partner agencies) and meant they were now seen as being more accountable to communities. Quotes from national office staff of HAP member agencies illustrate this:

"It has increased our agency's commitment to people."

"Staff had to change their attitudes and behaviours because decisions were now being taken by the community and not by staff."

"Staff humbled themselves."

Having an operational CRM was also thought to increase communities' trust and confidence in the agency and to increase the agency's credibility; interviewees felt that this led to communities feeling more empowered and therefore becoming much more co-operative improving relationships between communities and staff. As one national office staff member from a HAP agency stated: "*Communities understand that not everyone can receive support and that resources are limited; they are quite rational*".

Some of those interviewed from national offices argued that having a CRM allowed them to follow trends in complaints-handling and allowed them to identify gaps in their programmes. Staff from one HAP member agency pointed out that their CRM had made their jobs easier because the communications officers could develop a more appropriate plan of what needed to be communicated, to whom and when.

When asked how the CRMs affected *programme site* staff, many national office staff did not have a clear answer. The majority knew of instances where staff had an initial resistance to implementing the CRM. But others with a pre-existing 'zero-tolerance', 'gender', 'fraud and corruption' and other similar policies felt that CRMs were accepted as necessary and a good fit to their programming.

Other benefits of an effective CRM for programme staff as perceived by national office staff included:

- providing checks and balances between staff
- preventing staff from doing "the wrong thing"
- A few agencies gave examples of complaints that had led to staff dismissals either because of unacceptable behaviour or fraud and corruption
- providing an outlet for staff to complain about other staff in a safe environment
- protecting programme site staff from undue pressure when working in communities, by preventing members of the community from making illegitimate complaints.

One example given detailed how a senior member of the community complained about being insufficiently consulted on the agency's activities. He was told that he could make a formal complaint through the CRM. It transpired that this individual had a vested business interest in the agency's response since he had hoped his company would be contracted to do some of the work. Being asked to make a formal complaint meant that this could come to light and prevented this person from continually complaining verbally to staff in the field.

The only comment regarding the impact on national office staff came from an agency representative who reported that dealing with complaints increased their workload. Other national office staff did not comment on whether or not a complaints-handling procedure impacted on their activities in a negative or positive way.

3.5.4 CRMs for staff

National office staff from all participating agencies described fairly similar CRMs for staff. Often these involved the complainant speaking or writing to their line manager in the first instance or to a designated staff member. Occasionally, there was also a 'hotline' or an e-mail address to which complaints could be sent. Complaints covered issues such as zero tolerance, code of conduct, ethical questions, whistle blowing, fraud, harassment, bullying and (child) protection policies.

Most staff were informed of these policies as a part of their staff induction and were provided a copy of relevant policies and guidelines. However, the majority of national office staff interviewed could provide only a rough outline of what their procedure involved and were often uncertain about the specifics, such as what a legitimate complaint included or the procedure once the complaint was submitted.

In terms of their effectiveness, staff from most HAP and non-HAP members responded candidly on the challenges involved in operating a CRM, mentioning that it was not easy for staff to complain to senior managers. One partner agency of a HAP certified member agency noted: "*The general experience is that you either absorb the problem, you put up with it, or you quit your job.*"

Most recognised that more robust systems were required than currently existed in their agencies. Additionally, staff from more than one HAP member argued that, "*it is the communication of the right to complain that needs to be addressed*". Staff interviewed from HAP and non-HAP member agencies shared the opinion that informal systems were relatively effective and that staff could make a complaint through the line management system without worries of confidentiality.

International office staff interviews

3.5.5 International head office staff: descriptions of CRMs

At the international head office level similar procedures and policies were mentioned as at national office level, [22] although the descriptions tended to be more detailed, indicating a more comprehensive understanding of the available mechanisms.

International head office staff placed far greater emphasis on the use of people – rather than boxes or phone lines – to raise complaints. Most of these interviewees stated that their agencies had dedicated individuals to handle complaints, either staff members[23] or a member of the community, for example, a local leader, community committees, trusted and elected community members, or community based organisations.

In addition to the more traditional mechanisms, one HAP member detailed a system very similar to that described by *Agency 3* from the case studies above, where the CRM operated as a parallel system to the grievance procedure in order to capture sensitive complaints and to ensure junior members of staff have appropriate access. This member noted that, although national office staff were generally supportive of this mechanism, management had mixed views; some were encouraging of it, whilst other saw it as bureaucratic and unnecessary.

3.5.6 The effectiveness of CRMs

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[22] All International Head Office staff interviewed worked for HAP member agencies.
[23] Dedicated accountability staff were part of project teams but were not directly involved in service provision. Depending on the nature of the work, they would either go on field visits with the project teams, or they would have 'information desks' or 'help-desks' at distribution sites. These staff members would be nationals of the country, but would ideally not be from within the community (to avoid being subject to local pressures and to bring some neutrality) although consideration should be given to ethnic and geographical identity and language. It was noted how difficult it can be to find staff with appropriate backgrounds, attitudes and skill sets.

Most stated that their agency was still in the early phases of implementing an effective CRM and some common problems were identified. These included:

- over-reliance on complaints boxes
- the inability of current mechanisms to deal with sensitive issues
- the lack of monitoring of CRMs for effectiveness
- the lack of involvement of the community in their design.

Most of these challenges point to the need to use a variety of channels through which communities can raise complaints (one agency arguing that it was wise to look at traditional and government CRMs that already existed).

3.5.7 Impact of the CRMs on service provision

Staff from the head office of international agencies held a similar view to those of national agencies; both groups believed that effective CRMs provided for an improved targeting and relevance of response as well as fostering improved relationships with the community. A respondent from a HAP certified agency stated that, "*where a CRM was efficient and effective, it brought a positive sense of empowerment and worth to communities*". Two further benefits were highlighted during these interviews; first, that complaints received through the CRM can be used to advocate with the host government on behalf of beneficiaries; second, that CRMs allowed agencies to recognise problems quickly and respond more efficiently than the previous methods of programme monitoring.

Some challenges of implementing a CRM were also identified; staff from one HAP certified agency mentioned that CRMs affected workloads and management stating: "*Some staff felt it is more work and it has become more complex. It is easier to say this is what we are going to do and do it and that's it. It added complexity to project management, but this is a good thing because it means delivery is more effective and significant.*"

Another staff participant from one of the HAP member agencies said, without good management, programme site staff could be left vulnerable and that the challenge lay in managers' ability to distinguish between "*the thing being complained about and the people involved in that work. For example, if the food distribution is late, this is not necessarily the fault of the food staff, so don't sack them, but deal with the real reason that food is late.*"

Staff from another HAP member noted that the main challenge for national office staff was introducing the CRM into the work of their partners "*What are we demanding of them, what can we offer them? It could potentially have a big impact on their [the national offices] relationship with partners*".

3.6. The impact on the management of humanitarian responses

This section examines the relationship between complaints handling and management systems. Staff at all levels found it difficult to answer how their CRM fit with, or impacted upon, management systems and the majority of discussion on this topic came from staff at the head offices of international agencies.

3.6.1 CRMs' fit with the management structure

Overall, there was little consensus on where those responsible for CRMs should sit within the management structure. Some argued that they should be separate from implementation, management and monitoring and evaluation functions. This was the view of the head office staff of two different HAP members (international agencies), one of whom said: "*Where you sit the accountability mechanism in the structure is key; ideally it should be separate from monitoring and evaluation and from implementation*"; "*those responsible for complaints and response mechanisms need to be independent, like an ombudsperson*".

Others suggested that CRMs should be linked with monitoring functions. For example, some agencies believed that their monitoring units had considerable power since they were seen as "*the third eye*" and their findings were taken seriously. Some felt that responsibility for CRMs should lie with national rather than expatriate staff as only national office staff could contextualise the cultural dynamics, placing them in a much better position to translate the theory of accountability into a practice that would work in the given context. However, a minority stated the opposite: having the responsibility lie with expatriate staff 'outside' the culture could allow complainants to speak more freely than with people from their same culture.

3.6.2 Who deals with complaints?

There was also discussion about what level of staff should deal with which complaints and how this could be managed. Generally, it was felt that a lot of complaints could be processed and dealt with straight away at the programme site level. The difficulties arose when complaints needed to be forwarded onto someone else: "*Do you have the system in place to deal with it as it moves away from the person who complained and up the management chain? How do people know how to allocate time to these things since they don't know when a complaint might arrive or how long it will take to deal with?*" (International head office staff)

Some senior staff recognised that junior staff might not feel comfortable in communicating complaints up the line management chain. As one national office staff member explained: "*Here, you don't speak to your boss unless you're spoken to*".

For the participating HAP Certified Agency (*Agency 4*) the CRM was integral to their approach to, and management of, their work; the monitoring officer was responsible overall for the system, with the backing of the Country Director. CRMs were discussed in planning meetings with communities and complaints were handled as part of the day-to-day management process. Indeed, it was part of the very fabric of the work that was being undertaken with communities. One programme site staff member stated: "*It helps if all staff are involved with the complaints and response mechanism; they need to integrate it into other activities*".

3.6.3 Accountability and donor requirements: potential tensions

The majority of staff believed that timelines, log frames and budgets are what concern donors and that these priorities could hinder accountability to beneficiaries: "*Donors do not think about values, they're only interested in outputs and not the processes. But the process has a massive impact on the quality of the output.*"(HAP member national office staff) For example, it was not always possible to respond to complaints that required changing a good or service provision as donors would either not agree to it or the time involved in making the change would be prohibitive. One example that illustrates this relates to a complaint received on the type of seed distributed in Uganda. It took many months for the donor to agree to a new seed variety, by which time the planting season had come to an end.

In the course of these interviews, it was often argued that, whereas in the past agencies could be more flexible, donors are now increasingly requiring agencies to provide and document more detail of what they are doing, when and with whom which, again, was not always helpful in terms of improving accountability to beneficiaries as these quotes from HAP member national office staff illustrate:

"*The luxury of being able to be culturally sensitive in management style is disappearing.*"

"*The irony is that as you drive towards increasing accountability [with increasing paper work] you end up with the opposite.*"

Another concern was the resourcing of activities that enable agencies to improve accountability to beneficiaries, including CRMs, was raised as another concern. International head office staff from most agencies stated that they do not include a

budget line for accountability to beneficiaries in their donor proposals but incorporated these costs under staffing, administration, materials and monitoring and evaluation. The perception here was that some donors are far less willing to fund direct activities that would enable agencies to improve accountability to beneficiaries.

3.7. What do people complain about?

Although the scope of this study did not include an examination of the process of receiving and recording particular complaints, there was general agreement from staff of all participating agencies that the majority of complaints fell into three main categories:

- requests for further assistance (goods and services) and/or about the quality of goods and services provided
- targeting: people either did not know what the targeting criteria were or they felt that people were included on the beneficiary list who should not have been or people who should have been on the beneficiary list had been omitted
- staff (paid or voluntary) behaviour, although complaints of this nature were generally less frequent.

This is not necessarily surprising in the context of the study since most community members, bar those receiving support from the HAP Certified Agency, said that they had received little information regarding targeting criteria and details of goods and services to be provided. In addition, the majority felt that they had not been involved in decisions regarding these issues and that they had few (if any) opportunities to discuss provision options with agency staff (a requirement of HAP Benchmark 3).

Staff at all levels from most agencies stated that they received very few complaints in the course of their programmes and that they had not conducted a systematic analysis of *who* was complaining. Whilst most took the low level of complaints as a sign that they were doing a good job, a minority recognised that the small number of complaints could suggest that the mechanism was not functioning properly. In particular, very few complaints were received regarding sensitive issues and agencies interpreted this differently; some argued that the reason was the lack of complaints of this nature, whilst others argued that the mechanisms were not necessarily suitable for this sort of complaint and that affected populations were more likely to turn to traditional means of seeking redress in order to resolve sensitive issues.

4. Findings and Recommendations

To recap on the starting point for the study, the *HAP 2007 Humanitarian Accountability and Quality Management Standard* states that humanitarian accountability means that agencies take account of beneficiaries' opinions, concerns, suggestions and complaints. A complaint relates to a specific grievance that requires a response while opinions, concerns, suggestions and advice constitute feedback which agencies may adopt, challenge or disagree with as appropriate. HAP member agencies make a commitment to enable staff and beneficiaries to report complaints and seek redress safely while HAP certified agencies demonstrate their compliance to the HAP 2007 Standard, including Benchmark 5 which requires them to "*establish and implement complaints-handling procedures that are effective, accessible and safe for intended beneficiaries, disaster-affected communities, agency staff, humanitarian partners and other specified bodies*". Specific requirements for an effective CRM (a structured context-appropriate channel for disaster-affected communities to safely raise complaints and receive a response) are included in the HAP 2007 Standard. While there has been wide coverage of the principles in recent years there has been a paucity of information of the outworking of those principles in practice.

Section 3 in this report detailed the coal-face experience of 237 intended beneficiaries and staff involved in the implementation and running of CRMs, their perspectives on what contributes to a CRM functioning successfully and the impact of CRMs on service provision. It was seen that, for all but the *HAP certified agency* (*Agency 4*), descriptions and perceptions of CRMs differed (often considerably) between disaster-affected populations and staff; during the interviews for the non-certified agencies, the majority of representatives of the communities and programme staff felt that CRMs were not effective, whereas, national office staff were more confident in their effectiveness. For the HAP certified agency (*Agency 4*)*,* the communities as well as staff from all levels were overall positive about the effectiveness of the CRMs although suggestions for improvement were still made.

Giving particular emphasis to the views of the communities and staff in Bangladesh and Uganda, this section analyses the material gathered further and draws out the resulting implications for planning, implementing and maintaining an effective CRM, using the HAP Standard Benchmark 5 (which details the criteria for CRMs) as the reference framework. Since all six of the HAP Standard Benchmarks are operationally linked (i.e. agencies cannot effectively meet one Benchmark in isolation from the other Benchmarks in the HAP Standard), the other five Benchmarks are also taken into account when looking at the data.

Areas for analysis include: how to adapt CRMs to different community contexts; clarification of the purpose and limitations of the complaint-handling procedure; how to ensure that both communities and staff can understand the complaints-handling procedure (by sharing with them information in languages, formats and media accessible to all); implementation of effective and safe CRMs for staff; implications for management and the issues for consideration where agencies are working with partners.

4.1. Explaining the CRM to the community

One of the main findings from the case studies is that in the absence of relevant and accessible information, many members of the community – and most notably those with less power within the community – are unlikely to use the CRM; for a CRM to be effective, it is essential that information be shared in appropriate ways with *the whole*

community.[24] Below are some of the key considerations when communicating information about CRMs to communities.

4.1.1 Coverage: communicating to busy people and people on the move

Access to all community members can at times be challenging. Women often have few opportunities to move far from their homes or to talk to people, making it less likely that they would know about the CRM or have access to the CRM; men tend to be more mobile, but there is still a cost-benefit to making a complaint. As one FGD participant said: "*If we go to the local office it costs* [specified amount] *and we can't work for the day – if they don't take any action about our complaint then that loss is our reward. As we say here, 'you've lost your mango and your sack!'*"

The staff of the HAP Certified Agency in this study expressed it this way: "*Where people are quite physically dispersed or where they are busy thinking about how to get food, they often do not have time or money to come to community meetings. This can make it a real challenge to ensure that all of the community understand the complaints and response mechanism. In addition, if you hold a meeting just to talk about accountability people will not come. They only come if you're giving them something.*" They had addressed this challenge by utilising community facilitators to share information about the CRM (see section 3.4).

During some emergencies, large populations are often on the move; this means designing more innovative ways of informing people for these populations and adapting the CRM to ensure that investigations of and responses to complaints take place within acceptable timeframes.

4.1.2 Clarity on what can be complained about

CRMs can be seen as "*the sky's the limit by communities*" (as mentioned by one programme site staff member in Bangladesh) making it difficult to manage expectations. This issue is addressed in HAP 2007 Benchmark 5[25] which requires CRMs to be explicit on the boundaries of what can be included and what is excluded. For example, where complaints encompass service delivery, then it is essential that programme site staff are aware of what they can and cannot deliver and the timeframes for delivery and can communicate this.

When complaints relate to issues other than service delivery such as staff conduct this can be harder to delineate and staff need to be fully aware of the standards themselves as well as providing communities with the fullest possible information about the agency, its value commitments, programmes goals and so on. As one staff member from a HAP Certified Agency explained: "*It is more straightforward for distributions, or building wells, etc, but in relation to staff conduct there is a staff handbook that explains what is un/acceptable conduct – it is understood by staff, but at the moment the community is given general statements e.g. child abuse, fraud, etc are unacceptable. We want to develop a staff code of conduct that we can then make public – with positive expectations of staff behaviours and things we would find unacceptable*".

4.1.3 Language and literacy levels

The case studies showed that language can be a critical barrier to sharing information about CRMs between staff and communities (see section 3.1.4). Providing information in the relevant language[26] is important not only for communities but also for national office and programme level staff. In areas where a variety of languages and/or dialects are spoken, it can be challenging to communicate in all of

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[24] See the HAP 2007 Standard Benchmark requirements 2.1 and 5.3 on information sharing and an explaining the complaints handling system to affected communities.
[25] HAP 2007 Standard Benchmark 5, requirement 5.2
[26] HAP 2007 Standard Benchmark 2, requirement 2.1

them as budgets do not always cover translation costs. Employing some members of staff who speak the local language addresses this issue.

Importantly, the word 'complain' was said by many to be difficult to translate (in Bangladesh, some staff chose to use the English word 'complain' rather than a Bangla equivalent). One staff member from the head office argued that the word would usually be translated into something more akin to 'feedback' or 'suggestion', because the most common translations of the word had "*quite hard connotations*", which may be threatening to staff. Translations of information into the local language need checking to make sure the concepts are *culturally* as well as *linguistically* 'comprehensible'.[27]

Even when materials are produced in the local language, literacy still remains a challenge (see 3.1.4). Overreliance on the written form to share information about the CRM and to receive a complaint is likely to prevent the most vulnerable and marginalised from being able to complain, potentially reinforcing power imbalances that already exist within communities. Inviting the community to identify the most appropriate channels of sharing information and of raising complaints with the agency is an important first step when setting up a CRM.[28]

4.2. Power imbalances within communities: whose voice counts?

A second finding from the study is that, unless a CRM explicitly takes into account the internal power dynamics within communities, some voices are more likely to be heard than others.

A number of national office staff from various agencies highlighted that the more vulnerable and/or marginalised members within communities would often have to get past "*the gatekeeper*" in order to complain or would not feel qualified to or comfortable about complaining. One national office staff member stated that, "*non-educated people do not want to talk to educated people so this could be a barrier, especially for older generations and possibly for women too*". Communities and staff also discussed how certain people – the rich (as in section 3.1.6) and the 'well respected' (section 3.2.4) and men (section 3.4.4) more generally – were less likely to be viewed negatively by their communities if they complained.

Power imbalances between community and staff were also cited as a barrier to the effective functioning of CRMs. National office staff from one HAP member agency said that, "*It's tricky because of power and language. It can be hard for some community members to get through the door. We aren't very accessible*". This point was reinforced many times by communities in the first two case studies, as the following quotes from women and men beneficiaries of *Agency 1* and *Agency 2* illustrate:

"*We can't go and tell them [the agency] what we don't like, how can we do that? You [the interviewer] can go and talk to them but we can't.*"

"*If we went to [agency] they wouldn't listen to us but they would listen to a respected person. So if we had a complaint we would go to the local politician or the headmaster or a respected person.*" *(section 3.2.4)*

"*In our country we don't all enjoy equal rights. All of us don't have equal value. If there were any discussions we would not be invited, only rich people are invited. Who will listen to us? No one listens to the poor.*"

"*If we make a complaint they [the agency] will get angry with us.*"

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[27] HAP 2007 Standard Benchmark 2, requirement 2.1
[28] HAP 2007 Standard Benchmark 5 requirement 5.1 and 5.3

Community committees, which are established to represent communities, did not necessarily solve this issue. One female beneficiary of *Agency 1* explained: "*From each of the [groups] they take one man who becomes a member of the committee*[29]. *The committee then come and talk to male members of the family – usually husbands – and they discuss what has been received and what more is required. The committee say they will try and bring that later. The problem is no women are involved in this*."

This point was also confirmed by some staff in the head office who reported that a number of complaints were not about the agency or the project but related to how particular people in the community would steer and lead activities to their advantage and at the expense of others. One member of staff from a HAP Certified Agency noted that "*there is a need to be clear about your stance on bringing about local change – what is our role in prompting or facilitating removal of bad leaders?!*", and another one said that "*it's about changing the social order…*".

Unless agencies ensure that all potential users are aware of and confident in using the CRM, they risk reinforcing existing power imbalances and consequently put at risk their ability to be accountable to the marginalised groups.

4.3. Culture and history of complaining: trust and community involvement

With respect to the effectiveness and impact of CRMs, staff at all levels highlighted the lack of familiarity with formal complaint handling in the particular culture and history of the community as an influencing factor: "*people aren't used to this [formal] complaining business*" and "*it is hard for a man in a community to understand that if he writes something down then he will get a response*" (programme site staff). A few put it more strongly, describing CRMs as "*unnatural ways*" of engaging communities. One international head office staff from a HAP member stated that, "*An audit shows that communities don't want to use CRM and they have no impact*."

More positively, the majority of national office and programme site staff interviewed stated that CRMs could be relevant but that they needed support on how to tailor existing CRMs, and in particular channels for raising complaints, for their contexts: "*staff want to know how to do it, although there is a temptation towards a blueprint approach rather than thinking it through for themselves and working with the communities on what the best approach might be, we are slowly changing this view*" (*Agency 4* HAP Certified staff). Staff members from *Agency 4* also held that informed programme staff are well placed to help tailor CRMS: "*staff who recognise the strength of the affected populations and understand that people who live in a place are far more likely to know what would work and what wouldn't*" (National head office staff) and that given the time to develop a mechanism, they are far more likely to *own* it, understand it, take it seriously and want to see it working. This highlights the principle that to be accessible to and effective for beneficiaries, CRM designs need to take cultural as well as linguistic factors into account; in practical terms this means agencies consulting with communities to identify the most appropriate ways to handle complaints[30].

4.4. Staff attitudes, competencies and gender balance

4.4.1 Staff Attitudes

The fostering of good relationships was a recurrent theme in staff perception of what contributed to the successful functioning of CRMs: "*You can have as many systems*

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[29] It actually transpired that this committee was not made up of members of the micro-credit group but of 10 members of the community, including four 'respectable' members of the community such as the head master, religious leader, four farmers and two housewives.
[30] HAP 2007 Standard Benchmark 3.2, 5.1 and 5.2.4.

as you want, but it is all about relationships between staff and communities, demonstrating dignity and respect, having compassion, working with humility and a sense of equality; with that commitment and mind set amongst staff then the CRM is so much more likely to be meaningful and used, because there is no mismatch between the mechanism and what the community sees in terms of the attitudes and behaviours of staff. That is what makes the difference" (International office staff). Some national head office staff put it more simply: *"People don't remember what you gave them; they remember how you treated them. That's what's important."*

For a CRM to be working effectively, staff at every level also emphasised that a positive attitude towards accountability to the community was key: "*Staff commitment to be accountable and to fulfil their duties to the people is essential. You need staff who want to check whether people are satisfied with what they've done.*"(Programme site staff) Ensuring a complaint was followed through and a response given required energy and drive: "*It requires a certain amount of dynamism and will to take complaints and interpret them and know what to do with them.*" (National Head Office staff)

Agency culture was also seen as being fundamental to fostering the right staff attitude and follow through on CRMs "*To have a system is one thing, but the practice is quite another; the practice is more dependent on the culture of an agency.*" (National Head Office staff)

One HAP Certified agency included competencies and attitudes, such as empathy, understanding of community needs, listening, dignity, and respect, in the person specification of job descriptions;[31] these would then be part of the job interview process. Once recruited, the induction process would include discussion on these values, behaviours and attitudes, with a strong emphasis on quality standards, accountability commitments and examples of how to turn them into practice in a field setting.

4.4.2 Gender balance in staff

Most women interviewed in the community stressed that they would feel more comfortable discussing complaints with women than with men, but that it was often hard to access female members of staff. For example, women beneficiaries of Agency 2 said that, "*we feel uncomfortable raising issues when men are present*". In addition, they said that there were no female staff in the local office and that, when staff came to their village – which was rarely – "*they talk to the men, but it has nothing to do with women*".

Although many agencies accepted that the gender of their staff might play a key role in determining whether women would feel comfortable in complaining, for the most part the vast majority of relevant staff were male particularly at more senior levels; importantly, this issue did not appear to be high on the priority list of what needed changing.[32] As staff from the head office of one HAP Certified Agency acknowledged: "*We have encouraged 1:1 [male to female] ratio and especially in some contexts it is essential for a woman to work with female members of the community if women are to feedback. But…it can be difficult to recruit women, but more so, it might be that the project staff probably have not thought through fully the requirements of the function and maybe we (as management) are not pushing hard enough*".

In the light of feedback from the communities interviewed in the course of the case studies (section 3.1.4) and in view of the importance of taking into account cultural norms (section 4.3), more female staff *at all levels* would be likely to improve accessibility to the CRM for both community members and staff and bring a different perspective in the process of setting up the CRM.

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[31]. HAP 2007 Standard Benchmark 4
[32]. HAP 2007 Standard Benchmark 6

4.4.3 Staff skills and capacity building

Lack of staff training was cited as a barrier to effective implementation of CRMs on several occasions: "*Staff on the ground need to be empowered in terms of information and skills. I'm not sure we give them sufficient training*" (programme site staff of HAP Certified Agency). And it was pointed out that training needed to be given at every level: "*It isn't just at field level that people needed training – there is an assumption that head office staff and emergency response teams understand this stuff, and this is often not the case!*" (International head office staff)

It was also pointed out that training and supporting documentation needed to be adapted for cultural appropriateness and end user literacy levels: "*I'm supposed to create a simple manual on accountability. The problem is that the leaders will leave the manual on the shelf. We don't have a reading culture. That's why we want to leave the formal training and make it as informal as possible; have lots of community meetings where people can talk more freely*" (HAP Certified Agency programme site staff).

Some staff raised the issue of refresher training: "*We need refresher trainings about the CRM. Accountability is dynamic, how often do we update training for staff on these matters, let alone for beneficiaries themselves?*" (Programme site staff of HAP Certified Agency) i.e. that training should not be a one-off activity; continual capacity building through effective means is needed.[33]

4.4.4 Staffing during sudden-onset emergencies

An additional challenge in humanitarian settings is that large numbers of newly recruited staff are often deployed or re-deployed with limited induction or previous relevant experience and often on a short-term basis so "*it can be hard to get them motivated and committed to these initiatives*" (National office staff). Agencies need to carefully consider how short-term recruitment processes can ensure that new staff understand their roles and responsibilities and implement the principles of accountability.

This is especially important since unstable situations already make it more challenging to put effective CRMs in place, as one staff member commented, their agency had encountered many difficulties in setting up a CRM an emergency programme (previous to this study), saying that "*People were traumatised. They needed to focus on their livelihoods – their minds were elsewhere. You can give them information and they say they understand it but it's very passive. For host communities it's much easier to assimilate because there is some stability there.*"

4.4.5 The quality of investigations

Whilst most agencies had in place procedures to verify the validity of complaints, there was limited understanding of and disagreement on what constitutes a satisfactory investigation amongst both staff and communities (see. 3.4.4 and 3.5.2) Although certain procedures aimed at impartiality were in place (for example, using staff from a different office in the investigation – see 3.3.2), there is a greater need to focus on appropriate methods for conducting investigations. Creation of a pool of investigators/agencies with specialised skills to work alongside effective CRMs (a service offered by the HAP Secretariat) is one way forward.

4.4.6 HAP capacity building helps

Some national office staff attended capacity building and organisational development workshops conducted by HAP and reported back as finding them highly useful. The training helped agencies and their staff to consolidate the running of their CRM, and

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[33] HAP 2007 Standard Benchmark 4.4

encouraged them to document procedures and keep records of complaints, which they had not been doing before.

For the non-HAP certified agencies contributing to this study, a diluted version of the learning garnered from such capacity building activities was found amongst staff at *programme site*; the practice of complaint handling did not always reflect the way that this is described at more senior levels. Training workshops seemed extremely useful for introducing the concepts of accountability and for generating staff thinking on how to improve accountability in their programmes, but they only scratched the surface in terms of actual changes. Corporate prioritising and integrated efforts at all levels are needed, including allowing programme site staff sufficient time to think through these issues for themselves.

4.5. Management issues

4.5.1 Leadership and incentives

When asked about the role of senior management, staff from some HAP members and certified agencies said that senior management would explicitly ask about progress in the implementation of the CRM as well as other HAP benchmarks when visiting staff in the field. This endorsement and active interest in this aspect of their work was seen as essential to securing staff commitment to the implementation of a CRM "*Staff need to be supported [by management] to do it*" and "*If management take it seriously then programme site staff will too because they will be rewarded for doing it*" (Programme site staff of HAP Certified agency). This view was echoed at the management level: "*Staff need to be aware that this is something the agency is interested in; it's a core capacity and responsibility for staff now*" (International Head Office staff).

Staff from some HAP members and certified agencies also said that having a set timeframe[34] to prepare for HAP certification provided much needed momentum and real focus to making specific changes in preparation for the audit whereas staff from agencies that were lagging behind said that improving accountability was not always explicit in staff work-plans and was often seen as an add-on to day-to-day work. Incentives and rewards for staff to make the rhetoric a reality were also seen as important. "*Following up on complaints is a hassle so it needs to be rewarded if it is going to happen*" (National office staff).

Some international head office staff also spoke of their responsibility to provide leadership and follow through[35] with respect to organisational culture change regarding accountability saying that this was especially important where working practices were long established and where funding providers and staff were focused more on appearances for the benefit of donors than quality of service provision: "*CRM need a selling job because NGOs are not rewarded for good service provision or impact for the people you engage with on the coal face. There is no notion of customer service. Funding comes from those who don't know what happens in the communities; the brand is more important than performance. Where you have an established office that has an existing paradigm (way of working), to start talking to them about quality, then there can be a struggle.*"

Overall senior management support and commitment to CRMs – and to accountability to affected populations in general – was seen as essential; where accountability was a corporate priority and senior management dedicated it time and effort changes were easier to implement at all levels.

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[34] HAP 2007 Standard HAP 2007 Standard Definition – 'Humanitarian plan: to include overall goal and objectives (outputs / expected results), time frame and linked financial summary'
[35] HAP 2007 Standard HAP 2007 Benchmarks 4.2 & 4.3

4.5.2 Who should deal with complaints?

In the course of interviewing head office staff, a need for roles and responsibilities for CRM to be clearly defined and communicated[36] was expressed "*We are trying to not separate dealing with complaints from the management system – what is really important is that each level understands their roles and responsibilities.*" And, specifically, that those responsible for CRMs should be senior: "*For success it needs to report high up.*"

Additionally, it was seen as important that management support their staff in their roles, which often left them vulnerable: "*People who are receiving the complaints need to be supported. It is worth noting that managers don't usually get fired – it is always more junior staff. They are on the front line and often without any decision-making roles, and beneficiaries tend to go to them for responses. Supporting the CRM needs to be built into the responsibility of the managers – this is absolutely critical.*" This view was also echoed by staff in the second case study (see 3.2.5) who said they did not always feel qualified or supported to deal with complaints especially where the validity of the complaint was in question.

Lastly the communication up and down the management chain was seen as vital: "*You need feedback loops and good communications systems and the capacity of people to use them.*"

4.5.3 Monitoring and evaluating the CRM

The difference in the responses given in the case studies by disaster affected populations and staff (mainly at national office level) with regards to the effectiveness of CRMs suggests that agencies need to continuously seek feedback from communities on the CRM. No agency examined in the study had a systematic or rigorous system in place to determine the effectiveness of their CRM with beneficiary involvement.[37]

4.5.4 Time management

Another challenge raised by staff was the amount of time that it takes to implement an effective CRM. Some reasons for this have been covered in earlier sections but others include the time needed for both staff and communities to be trained in CRMs and for familiarisation to the new ways of working together "*participation does not happen overnight; you need to give it time, you have to be patient and build a rapport and trust between the community and staff*" (HAP member national office staff).

The time required to implement an effective CRM and then pursue investigations of complaints thoroughly (especially when other agencies are involved or it has to be referred up the management chain) can seem disproportionate and unattainable given the short timeframes required for emergency work, yet delivering emergency relief without taking into account the negative unintended or intended effects that programmes and staff may have on communities is not an acceptable option. As one national office staff member said "*There is an African proverb that says 'if you like to go fast go alone, if you like to go far go collectively'. This is how it is with accountability!*"

4.6. CRMs aimed at staff – what makes them effective?

The HAP 2007 Standard Benchmark 5 stipulates that the agency shall establish and implement complaints-handling procedures that are effective, accessible and safe not just for intended beneficiaries and disaster-affected communities but also for agency staff and humanitarian partners. Interviews in the course of this study also addressed the effectiveness of CRMs implemented for staff.

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[36] HAP 2007 Standard HAP 2007 Benchmark 2.4
[37] HAP 2007 Standard HAP 2007 Benchmark 6

A variety of factors were considered important in developing effective CRMs for use by staff. These were not dissimilar to the factors considered important in making a CRM aimed at communities effective and included: agreement with staff on the CRM and "*keeping it alive*" (for example by having posters about it in prominent places in the office, discussing it frequently in management meetings); being clear about what can and cannot be complained about (for example, distinguishing between complaints and general human resources issues); building trust in the system by ensuring complaints are treated confidentially, complaints being acted on, guarantees that there is no retribution for complaining and checking that the system works through internal auditing.

Provision of clear guidance for staff receiving and/or investigating the complaint was often neglected. Role-playing was thought to be a good way to train staff in the implementation and use of staff CRMs.

It was also argued that attitudes (including those of management) were important i.e. an effective CRM aimed at staff needed to rely on more than just systems and procedures: transparency, good management and a culture of openness and listening were also critical. One staff from the head office of a HAP member said "*The impact of the CRM on staff is very much linked to how everything that is around the CRM is dealt with, for example, how you communicate to staff, whether you are seen as fair and so on.*"

The links between CRM aimed at staff and those aimed at communities

There was insufficient time in the course of this study to be able to examine in-depth the links between CRMs aimed at staff and those aimed at communities. However, one person summed up the potential link by likening the ability of staff to implement an effective CRM for communities (when they themselves did not have access to one) to a parable:"*A man goes to see Mohammed because he is concerned that his father eats too much sugar and this will make him ill. He wants advice on how to help his father give up. Mohammed tells him to come back tomorrow. When the man returns the following day, Mohammed once again tells him to come back tomorrow. This continues until the third day when Mohammed explains that he himself had spent those days trying to give up sugar so that he knew what it would feel like and whether it would be possible before he could give the man advice.*"

4.7. Working with partners

From the perspective of the implementing partner of one HAP member agency, the constraints placed on their work by the demands of the agency left them with limited autonomy over how to implement programmes. They felt disempowered – "*dictated to*" – and they found themselves repeating these power relationships with the affected populations that they were trying to help. They did not feel in a position to 'empower' others while they themselves felt disempowered. Without genuine and reciprocal partnership, they found it difficult to be accountable to affected populations; the onus was always on meeting the demands dictated by their partner.

HAP members, on the other hand, said that they were not comfortable demanding of their partners that they set up CRMs: "*We want it to be something they see as a priority; the light bulb needs to go on for them*" (International head office staff of HAP Certified Agency).

It is important to note here HAP's acknowledgment that partners of HAP members are autonomous entities, which have not necessarily made a commitment to the HAP *Principles of Accountability* or the *HAP 2007 Standard*. The Standard does not require agencies to make any demands of their partners with regards to improving accountability, rather it asks compliant agencies to:

1. inform and make their partners aware of the agency's own Humanitarian Accountability Commitments i.e. the partner should be aware of what

standards, codes, and guidelines the agency has signed up to and whether any of these have direct or indirect impact on them

2. discuss and agree with partners the means to improve the quality of their partnership by strengthening the partner's ability to apply the Principles of Accountability and the Principles for Humanitarian Action.

In particular, HAP certified agencies agree with their implementing partners means through which beneficiaries can raise complaints both with the implementing partners as well as directly with the agency.

All agencies participating in the study appreciated the importance of supporting their implementing partners, through seconding staff, inviting partner staff to trainings and workshops, producing good practice guidelines etc. Incorporating references to beneficiary accountability into partnership documents and grant agreements was mentioned as another way of clarifying expectations. It was also suggested that having "*more neutral HAP Secretariat people*" visit the sites can be beneficial since they can speak more openly with partners.

Another issue raised was the question of to whom disaster affected populations should complain; the agencies working through partners argued that ultimately they had a responsibility to the beneficiaries, so beneficiaries should be able to complain to them if they were not happy with the partner (or how the partner had dealt with their complaint). This raised both the challenge of how to access beneficiaries through partners and the partner feeling by-passed in the complaints mechanism.

Increasing numbers of agencies engage with and support government responses to emergencies. Whilst governments have inherent accountabilities to their populations, introducing a CRM into the mix was often described as an additional challenge. Yet the experience of the HAP Certified Agency suggests that relationship building and dialogue with authorities on this issue is critical.