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LEARNING BRIEF

OBSTACLES AND OPPORTUNITIES FOR DRC TO ADDRESS COMMITMENT 5 OF THE CORE HUMANITARIAN STANDARD (CHS)

LEARNING SYNTHESIS AND GLOBAL REVIEW OF DRC'S FEEDBACK AND COMPLAINT RESPONSE MECHANISMS

AUGUST 2020

«Recent studies have shown that despite policies and language about putting people at the centre, many humanitarian organisations are not yet able to do that in a systematic and genuine way… Commitment 5 of the CHS scores the lowest in terms of implementation of the nine CHS Commitments. Organisations often have policies in place related to community feedback and complaints but putting those policies into practice often proves challenging.»

CHS Alliance 2019

INTRODUCTION

DRC country offices have, where possible, implemented Feedback and Complaint Response Mechanisms (FCRMs) that are context-specific and reflect the demands as well as the capacities on the ground. This has generated field-level learning which, however, is not available to the organization as a whole. Therefore, in order to understand DRC's current standing and engagement with community FCRM's, a global review was undertaken to systematically collect different experiences and practices of DRC country offices in regard to the design, implementation and management of FCRM's; and to create a summary of global takeaways, lessons learned and success stories so that the organisation has a better understanding of current practice of FCRMs within DRC globally.

Setting up feedback and complaint response mechanisms is one method of participation as it is fundamentally about engagement with, and participation of, affected people and communities. If people are engaged from the outset through formalised feedback procedures, then programmes can be people-centred and responsive with learning systematically recorded, tracked, adapted and integrated. Further, they must be seen as part of a broader commitment to quality and accountability that genuinely enables communities to hold humanitarian organisations to account. While organisations often

say that is what they do, the practice does not always reflect the aspirations[1].

Despite strong ambitions, for DRC the lack of engagement with displacement-affected people came to light during recent Core Humanitarian Standard (CHS) external HQAI certification compliance audits (2017 and 2019). DRC must take immediate action to improve, in particular, in regard to Commitment 5 of the CHS on complaints handling systems, for which independent accredited auditors have repeatedly highlighted areas of non-conformity.

This learning brief highlights 10 key obstacles and opportunities in the implementation of effective FCRM systems found to be prevailing within current DRC practice during a recent global documentation review. It is important to emphasise that many of the aspects henceforth described are challenges not unique to DRC, but also faced by the humanitarian sector as a whole. For more in-depth information regarding each of these obstacles and opportunities and zoomed-in country learning, see the long-form report: Learning Synthesis and Global Review of DRC's Feedback and Complaint Response Mechanisms.

This exercise aims to improve DRC's inter-country learning and compliance with Commitment 5 of the Core Humanitarian Standard (CHS) to enhance DRC's FCRM's across all operations with the ultimate goal of strengthening the voices of people affected by crisis and displacement – so the views, rights and dignity of people of concern remain at the forefront of our work.

KEY OBSTACLES AND OPPORTUNITIES IN MEETING COMMITMENT 5 OF THE CHS

OBSTACLE 1   **COMMUNITY PARTICIPATION IS OVERLOOKED**

The first step to creating an effective FCRM is through thorough and meaningful participation of affected communities the system is being designed for. Mechanisms must be designed to take account of the needs, risks, vulnerabilities, preferences and capacities of different groups. Consideration should be given to how barriers to raising concerns can be overcome - whether these are physical, cultural, rooted in fear, or a lack of awareness regarding the mechanism, confidentiality processes and the right to use it. Across a vast majority of DRC country operations, the participation step of the design process was poorly executed. It is often just accepted that this stage of the process is labour and time intensive, however as emphasised in the Inter-Agency PSEA-CBCM Best Practice Guide "consultation with the affected population is necessary to create a culturally sensitive and effective FCRM."[2]

Very few country offices outlined how entry points for FCRM's were designed and why. Community consultation should be part of FCRM action plans, SOPs or guidelines, and instruction included on how to conduct community consultation prior to the design of the system. Each modality will need to adopt a context-specific approach and be selected based on the appropriateness as per every single location, target population, language and project activity. All FCRM systems need to be designed with the community (and sub-groups) in mind to incorporate their experiences, reality and expertise to account for contextual diversity and sensitivities. DRC must make a deliberate effort to understand contextual challenges, the most appropriate communication modalities and/or other conflict or political sensitivities.

It is crucial for DRC to be creative and proactively think of new ways to 'go to' communities to be able to receive feedback if traditional methods are not available or possible. The primary way of finding out the most relevant modalities is to prioritise spending time with communities, building trust and relationships and embedding opportunities in the project cycle to routinely listen and promote participation.

OPPORTUNITIES

✔ Plan for participation – include a section devoted to 'community participation', in SOPs, action plans and FCRM guidelines – focused not just on consultation, but also people's active involvement in FCRM processes (where feasible) and decision-making.

✔ Develop a roll-out plan outlining the modalities chosen for where, what activity, when, for whom and the staff member responsible; ensure each entry point eventually decided on is documented with a short explanation on why and who it is intended to serve.

✔ Evaluate, reflect and routinely adjust your set-up - continue to review the system and modalities in place by conducting regular evaluations of the mechanism and modalities. An FCRM system is not and should not be stagnant.

✔ Attention should be given to whether the FCRM system is:

• accessible – are targeted populations able to reach the mechanism and different entry points equally – people of all genders, ages and diversity characteristics?

• well-known – are community sensitisation methods effective – in multiple languages and formats (both written and verbal), is their purpose and scope well explained?

• confidential and trusted – assess whether all modalities are being used to their full capacity and try to understand why and why not.

• clear and uncomplicated – is there one or multiple FCRM systems to receive feedback? Creating separate mechanisms for each type of humanitarian programming and/or staff misconduct issues can be confusing for community members and staff, resource intensive, duplicative, and risks inconsistent response rates which may jeopardize the credibility of the humanitarian community and their ability to adjust programming.[3]

[1] CHS Alliance, CHS Alliance Support to Complaints and Feedback Mechanisms: Unpacking the Complexity to Address the Challenges, https://d1h79zlghft2zs.cloudfront.net/uploads/2019/08/Complaints_and_Feedback_Mechanisms_Report-08_2019.pdf, June 2019

[2] Inter-Agency Standing Committee, Inter-Agency PSEA-CBCM Best Practice Guide. International Organisation for Migration (IOM), Geneva, 2016, p. 19.

[3] Ibid

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OBSTACLE 2 — FEEDBACK AND COMPLAINT CATEGORIES ARE AMBIGUOUS

The creation of clear and concise categories for the types of feedback and complaints received is one of the most important parts of an effective FCRM. Without explicit criteria outlining the specifics of each category, the system will likely be inefficient, and the resolution of cases will be slowed, which ultimately undermines the entire system and has the potential to cause harm to affected populations. The inadequate, inconsistent and confusing definitions observed across multiple DRC country offices of feedback and complaints categories within DRC FCRM documentation was a prevailing issue. This is of particular concern given that the SOPs and guidelines are supposed to be the first point of reference for the FCRM operation and if these documents do not outline the different types of feedback and complaints clearly, this will make it incredibly challenging for staff implementing the system to fully understand the nature and severity of different complaints and thus act on them appropriately.

OPPORTUNITIES

✔ Descriptions and examples of the criteria of each category should be included in FCRM SOP or guidelines to avoid confusion and provide clarity. Each category should also outline a specific time period for response with the most serious complaints escalated and handled as quickly as possible.

✔ The immediate categorization of a complaint once it has been recorded triggers the next steps required for timely resolution. Clear and concise categories allow for easier identification of the complaint. What follows is an example of good practice in the efficient categorization of feedback and complaints based on draft SOPs from DRC Myanmar[4].
  • Category 0 – Appreciation or compliments
  • Category 1 – Request for information
  • Category 2 – Request for support or assistance
  • Category 3 – Programmatic complaint – dissatisfaction with activities
  • Category 4 – Sensitive – protection issue reported
  • Category 5 – Sensitive – CoC violation of DRC/DGG staff
  • Category 6 – Sensitive - serious violation by other humanitarian actor or non-DRC/DDG staff

OBSTACLE 3 — COMPLAINTS HANDLING PROCEDURES LACK CLARITY AND SIMPLICITY

Feedback and complaints response mechanism procedures should be clearly and simply laid out, leaving no room for ambiguity about what happens once a complaint is received. All parts of the feedback loop cycle should be straightforward both in terms of instruction and actions. The FCRM policy and procedures should explain concisely: how the complaint is received (agreed modalities), how it is processed (by whom, categorisation and database management), how it should be referred (internally and externally), ideal timeframes for resolution, and how feedback is periodically analysed, reported and shared for ongoing programmatic learning.

It is critical for staff to know how a complaint should be handled through agreed upon processes clearly and simply documented. If DRC staff are unaware or unsure of internal procedures, then affected populations will be confused and also ill-informed and likely not trust in the mechanism. Many of the DRC countries examined through the documentation review had convoluted and/or inadequate instructions and SOP's regarding the complaints handling process and the feedback loop of complaints.

OPPORTUNITIES

✔ Develop a step by step SOP or guideline outlining the procedure once feedback is received, some country offices also include this information within a categorization table with detailed steps for each feedback category.

✔ A simple flowchart or workflow outlining the procedure is a strong method of visually presenting the correct procedure flow depending on the feedback or complaint level received.

✔ The development of an appropriate 'script' for the person receiving feedback is a useful tool in making sure all important and relevant steps are covered at the initial phase of the complaint handling (particularly for hotlines). E.g. DRC Uganda's Interagency Hotline has a simple script of important points and key information to guide hotline staff.

✔ Once a country has a robust procedure in place, there must be systems in place to ensure that staff are periodically trained.

OBSTACLE 4 — LACK OF ADEQUATE TRIAGING AND LINKAGES BETWEEN PROGRAMMATIC AND SENSITIVE COMPLAINTS

Whilst the global HQ DRC Code of Conduct Reporting Mechanism (CoCRM) and the community FCRM systems are separate and take different reporting and investigative channels, it must be acknowledged that there is a link between the two and both systems need to connect (at least via the backend) to ensure sensitive complaints received through community FCRM modalities such as phone hotlines, complaint boxes or other can be fast-tracked to and recorded in the global DRC CoCRM. There is widespread confusion amongst all levels of staff on how these systems link and should ideally connect – this was also stressed as a key area of improvement by HQAI independent CHS auditors in the recent 2019 mid-term audit certification process.

Further supporting this disconnect between both systems, many of the FCRM SOPs and guidelines reviewed focused solely on the procedures for programmatic complaints and there was little mention made of how issues of misconduct reported at field level connect to the broader internal DRC CoCRM. Whilst the CoCRM and FCRM are handled as separate processes, it is integral that the systems link to each other because inevitably when promoting any feedback modality or system to the community, all categories of complaints will be raised at the community level, including those of a sensitive nature. Appropriate information management systems were developed in countries such as Lebanon, Myanmar and Iraq – all were examples of appropriately triaging and effectively managing both programmatic and sensitive feedback data.

What is key is that staff are made aware of how to deal with all complaints safely, appropriately, immediately and confidentially and that they know their responsibility to report any suspected misconduct straight to the CoCRM, including volunteers, incentive workers, cleaners and/or drivers who are often at the frontline of activities. Further, all DRC personnel must be trained to know that all cases involving Sexual Exploitation and Abuse (SEA) of a DRC staff member must be immediately forwarded and reported to the global CoCRM, at the Gate B level, at HQ.

OPPORTUNITIES

✔ SOPs and guidelines must include references to the CoCRM procedure in the FCRM documentation outlining links to the separate CoCRM processes so that staff can easily access this information if they receive a sensitive complaint.

✔ A simple flowchart outlining the division of programmatic and sensitive complaints is an easy way of illustrating the process for both People of Concern and staff. This can provide an easy visual aid to understand how the different complaint categories are handled and where the links in the systems are. DRC Syria's SOP's provide a good and simple example of the FCRM and CoCRM connect and differences.

✔ Continued staff training of the two systems is integral to making sure this connection is not lost and the systems remain robust and effective.

4 Danish Refugee Council, DRC/DDG Myanmar Feedback & Complaints Response Mechanism (FCRM): Standard Operating Procedures (SOP). Danish Refugee Council, Yangon, 2019, p. 9.

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OBSTACLE 5 — DEFINITIVE AND CLEAR-CUT TIMEFRAMES FOR RESOLUTION ARE NEEDED

Ensuring feedback and complaints are received and managed in a timely manner adhering to a set timeline outlined in the FCRM procedures is integral to the building of trust within a system and to 'closing the loop'.[5] Additionally, without prompt handling of feedback there is little room to improve and adapt programmes. Many DRC country office procedures do not clearly outline the response and closure times for each feedback or complaint category. If communities are not being responded to in a timely manner, then they will doubt the efficacy of the system and will not use it.

OPPORTUNITIES

✔ Each feedback and complaint category should have a specific timeline outlining the number of hours or days that can be taken to respond - with the most serious complaints being responded to with speed and urgency. This can be outlined in SOPs, workflows or complaints category tables.

✔ When designing these timeframes, take into consideration the different entry point/modality's process of receiving complaints, for example: how many times can a feedback box actually be checked by appropriate personnel in order for it to comply with the timeframes set? An example in the document review highlighted a case where the response timeframe for a complaint was seven days, however the feedback box was only checked once every two weeks.

✔ Do not set unrealistic timelines: these should be manageable within the capacity and resources of the country office.

✔ Several countries which employ phone or SMS hotline modalities can develop standard messages that are sent out for certain types of common feedback. This provides immediate information provision and minimises resources in having to get back to every individual enquiry made.

✔ Be honest and open with communities and let them know the realistic times for response on their feedback. Do not give false expectations and do not lie. If something is taking longer than expected, be transparent and make contact with the complainant to let them know the status and the hold up[6].

✔ Ensure programmatic feedback is also handled with speed, and where possible, this feedback makes it to relevant programme focal points so that changes can be made thereby improving the relevance and quality of our interventions.

OBSTACLE 6 — INADEQUATE PRIORITISATION OF STAFF TRAINING AND ROLE DELINEATION

An effective FRCM relies on assigning the necessary human resources and investing in appropriate training from the beginning of the design and implementation[7]. It is integral for any system that key staff who are involved in the running of the mechanism, at all levels, are well trained and their duties are clearly identified in system documents so that everyone knows who to go to at each stage of the feedback reporting process. Training about the FRCM procedures is also important for staff who are 'outside of the system'. All staff who deal with affected populations are likely to receive some form of feedback or complaint and they must know what to do with this information and communicate it to the right people or department through the right systems.

Across the DRC country FCRM SOPs and guidelines reviewed, the staff members responsible for the FCRM management and oversight were often difficult to identify. There must be a clear outline of the people and roles in charge of the FCRM system and its management. Furthermore, there was little emphasis within the SOPs and guidelines on the type of training included for staff both at the beginning of their time with DRC and as an ongoing refresher.

OPPORTUNITIES

✔ A robust and thorough staff training can make all the difference with regards to the efficacy of the FCRM. Trainings should occur upon introduction of the system with regular refresher courses made available and compulsory at appropriate intervals along with training and information as part of welcome packages to new employees[8].

✔ Outline staff and department roles and responsibilities in SOPs and guidelines, including what each staff member's role is within the system, even if they are not directly part of the dedicated FCRM team. A flow chart can often be useful in this circumstance to illustrate the direct lines of reporting and communication throughout the FCRM process.

✔ Refer consistently to the correct title of the focal point/officers/managers etc. throughout the entire FCRM policy or procedure document – for many DRC country offices, there were many inconsistencies throughout documentation referring interchangeably to the focal point/MEAL manager/accountability officer. If these positions are the same in your particular country operation, refer to them in the same way every single time. If they are not, make sure to identify this and the differences in their roles and responsibilities as well as the authority hierarchy in regard to the FCRM.
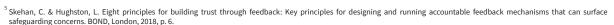
OBSTACLE 7 — INFORMATION MANAGEMENT SAFEGUARDING PROCEDURES ARE NOT IN PLACE OR TRANSPARENT

Protecting the information of communities is a fundamental element of DRC's duty of care to the people the organisation aims to serve and is an essential part of upholding the CHS[9]. Information that is gathered at any part of the project cycle should be handled with care and confidentiality and this is no less important when collecting feedback and complaints. It follows then that, part of an effective FCRM is an appropriately safeguarded database system. It was ubiquitously difficult to understand from the country documents provided who/which roles had access to the information management/reporting database and whether the database was centralized or if it was separated according to different country office locations/regions or individual projects. As few people as possible should have access to these databases, which hold highly sensitive and confidential information.

OPPORTUNITIES

✔ Clear processes and controls need to be implemented to ensure only authorized staff have access to FCRM data[10]. Tiered authority access rights provide a good way to allow different levels of access.

✔ Digital storage systems should be encrypted, and password protected, and any hard copy documents/records should be kept in a secure place.

✔ Data protection procedures should then be clearly outlined in a dedicated information management section in SOPs/guidelines which specify how information is compiled, recorded, stored, how this is protected and who has access.

✔ Staff access rights to the reporting system should be delineated.

[5] Skehan, C. & Hughston, L. Eight principles for building trust through feedback: Key principles for designing and running accountable feedback mechanisms that can surface safeguarding concerns. BOND, London, 2018, p. 6.

[6] Inter-Agency Standing Committee, Inter-Agency PSEA-CBCM Best Practice Guide. International Organisation for Migration (IOM), Geneva, 2016, p.51.

[7] Ammerschuber & Schenk, Complaint Mechanisms for Non-Governmental Organisations: A practitioner's guide, The Community of Cooperation of Bread for all & its partner organizations, 2017, p. 4.

[8] Ibid., p.41.

[9] CHS Alliance, CHS Guidance Notes and Indicators, CHS Alliance; The Sphere Project; Groupe URD, 2015, p. 20.

[10] War Child UK, Global Monitoring and Evaluation Manual, War Child UK, UK, 2014, p. 40.

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OBSTACLE 8 — SIGNIFICANT OVERSIGHT OF INFORMED CONSENT

Asking for and gaining informed consent at the time the feedback was provided was thoroughly under stressed in the DRC documents reviewed. The respect and confidentiality of the complainant is of the strictest importance and therefore it is imperative that consent is asked for at the time the complaint is made and continually throughout the complaints process. The complainant firstly must understand what informed consent means, where their information will be held and stored and who will have access to their information. If the complaint is serious, then the nature of escalation, should it occur, must also be understood and consent provided accordingly.

Finally, it is important to take into consideration the different contextual challenges that might affect the safety of different complainants and how certain personal information might put them in danger such as age, gender, race, disability, religion, sexuality, ethnic background, nationality, political affiliations and cultural organisations.

OPPORTUNITIES

- ✓ Ensure that informed consent is a formalized part of receiving feedback and complaints in all forms, all hotline and person-to-person 'scripts', etc. If the course of action changes, informed consent must be gained or requested again.

- ✓ If consent is not provided, then this must be strictly upheld and made note of accordingly. Likewise, if only partial consent is given.

- ✓ At the very least, all complaints handling staff should receive training on confidentiality, the importance of informed consent and how to manage disclosures and sensitive cases (including both protection and Code of Conduct).

OBSTACLE 9 — INEFFECTIVE COMMUNICATION, PROMOTION AND AWARENESS RAISING OF ALL ASPECTS OF THE FCRM

Communication is one of the most important aspects of creating an efficient feedback and complaints mechanism. However, it is also one of the most underestimated and neglected parts. Creating an effective complaints mechanism is not only a matter of setting it up, but also of communicating its existence, purpose and scope to all stakeholders. It is necessary to communicate clearly: a) what a complaint mechanism is as well as its purpose; b) how it can be used; and c) how feedback raised will be managed, followed-up and within which timeframes. For this reason, information about the mechanism should be easily visible, accessible and frequently communicated.

The promotion and awareness raising of the FCRM systems across DRC offices is universally weak and leads to a systematic breakdown where stakeholders are unaware of the systems in place and therefore the FCRM is underutilized and ineffective.[11]

OPPORTUNITIES

- ✓ Internally communicate the existence of the FCRM, clearly outlining its purpose and its functioning through regular staff meetings, trainings or inductions, website, social media, posters, flyers, appraisal meetings.[12]

- ✓ Externally communicate the existence of the FCRM, clearly communicating its purpose and scope as well as modalities through public meetings, presentations, newspaper, radio etc.[13]

- ✓ Seek permission (where necessary) and ensure that both local authorities, camp management or other relevant national actors are informed about the FCRM.

- ✓ The ways to promote the system must be contextually appropriate, e.g. what are the best methods for promotion within the country office's particular context? There is no point having text heavy posters if the community has high illiteracy rates – instead the use of cartoons, radio or community mobilisers might be more effective in many of the contexts where DRC operates.

OBSTACLE 10 — KNOWLEDGE LOSS BETWEEN COUNTRY OFFICES

DRC's decentralized nature means that often there is a lack of communication and knowledge sharing between country offices and part of the reason this review came about was due to the gaps in knowledge between DRC country offices about what different operations are doing and what DRC FCRMs look like globally. There is much to be gained from sharing documents and creating dialogue amongst DRC colleagues operating in different situations and contexts - and sharing knowledge and learning decreases the possibility of unnecessarily reinventing the wheel.[14] Inspiration should be taken from other offices with regard to all aspects of the FCRM, not least unique ideas for information management systems and modalities.

OPPORTUNITIES

- ✓ As a result of this review, a global FCRM repository of internal tools and resources can be accessed and utilized by all DRC colleagues. Here, inspiration can be gained, and examples of countries promotional materials, SOPs, guidelines and all documentation is available.

- ✓ A networking platform was developed to facilitate this (and future exercises) – the DRC AAP Working Group – which aims to strengthen communication on accountability to affected populations between colleagues across DRC operations globally – this network tackles ongoing debates and discussions, poses questions, concerns, queries, and continues to share resources.

- ✓ DRC's Global MEAL Unit hosts an annual global event with all DRC MEAL colleagues where accountability to affected populations is now permanently on the agenda. This event will continue to provide opportunities to showcase, learn, network and document current practice in regard to FCRM's and participation.

- ✓ This global document review in and of itself highlights key FCRM trends for DRC and thus it is hoped that it inspires collective action and improvement on the key issues raised throughout.

Of the country offices that participated in this review, five were selected for follow-up semi-structured qualitative interviews with questions asked about the country offices' specific FCRM contexts, challenges, achievements and lessons learned. These country zoomed-in case studies can be found in the more extensive long-form report of this global learning synthesis and review.

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[11] Ammerschuber & Schenk, Complaint Mechanisms for Non-Governmental Organisations: A practitioner's guide, The Community of Cooperation of Bread for all & its partner organizations, 2017, p.40

[12] Ibid., p. 4.

[13] Ibid.

[14] Ibid., p. 3.