Feedback and Complaint Mechanism

Document information

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Contents

1. Introduction

Dorcas is committed to create and maintain high standards regarding integrity, safety and security throughout the entire organisation and its operations. Dorcas is committed to base its activities on participation, communication and feedback. Dorcas is also committed to the "do no harm" principle and aims to safeguard people we interact with, including people affected by poverty, exclusion and/or crisis, from acts of (gross) misconduct by staff. It is essential to Dorcas that it is easy for people affected by poverty and/or crisis, costumers, staff and other stakeholders to approach Dorcas with any kind of feedback and complaints. The way we organize this is described in this Feedback and Complaint mechanism. The Feedback and Complaint mechanism is part of the Dorcas Integrity Framework.

1.1 Objective

The objective of this manual is to help ensure that:

1. Relevant Dorcas staff are aware how to set-up a feedback and complaint mechanism. Dorcas staff know how to consult and inform the community with regard to the feedback and complaint mechanism.

2. All people affected by poverty, exclusion and/or crisis, beneficiaries, supporters (including customers, donors and volunteers), partners and staff, know where and how to give feedback and/or report a complaint.

3. All feedback and complaints to Dorcas are handled with care and receive adequate follow-up. Every user of the feedback and complaint mechanism receives an adequate response.

4. Dorcas reports on and learns from feedback and complaints.

1.2 Framework

This manual is intended to work within the following Dorcas policies and guidance documents:
- Integrity Framework
- Code of Conduct
- Disciplinary procedure and guidelines

Other documents and/or processes that are also referred to in this manual are:
- Partnership Policy
- Security incident reporting (review)
- Data breach reporting (review)

Standards
The mechanism described within this manual adheres to the Minimum Operations Standards for the Protection against Sexual Exploitation and Abuse (set by the Inter-Agency Standing Committee of the UN). The mechanism also fits the requirements of ISO Partos 9001: 2018, the Core Humanitarian Standard on Quality and Accountability, the Framework Partnership Agreement with ECHO and the Child Protection Minimum Standards.

Applicability

The mechanism applies throughout the organization, including the countries where we work and the Dorcas shops in the Netherlands. It also applies to all categories of contact persons: people affected by crisis, poverty and/or exclusion, beneficiaries, customers, donors, other external parties and employees (incl. volunteers). Whereas this mechanism does apply to all these people, some of the documentation ahead has undoubtedly a focus on the interaction with people that participate in projects in the countries where we work. For other contexts, such as the Dorcas shops, further contextualisation might be needed.

This document also applies to all types of interactions: feedback, ideas, questions, requests, reported issues, allegations and complaints. In this document we summarise this using the term 'feedback, and complaints'. If through the Feedback and Complaints mechanism data breaches and/or security incidents are reported, they need to be followed up in specific processes (add reference).

With regard to projects implemented in countries where Dorcas works, this Feedback and Complaint mechanism applies to the "self-implemented" projects. Projects that are implemented by partners should have their own mechanism in place. Partners can use this mechanism as an example and apply the above-mentioned standards. Operating a Feedback and Complaint mechanism is also required in the Partnership Policy.

Integration in FIT
With the publication of the current version it is not yet fully clear how the complaint mechanism and the complaints registries of the various Dorcas Country Offices will be embedded in the Future IT (FIT) infrastructure that is being developed. It might well be that this will move into the FIT infrastructure. Relevant people will be informed about the when and how if this will be the case.

1.3 Reading instructions
The remainder of this document has been build up as follows: chapter 2 discusses setting up and sharing information about feedback and complaint channels; chapter 3 describes the procedure to process feedback and complaints; chapter 4 describes on aggregate level how country offices will report to the international office regarding feedback and complaints; finally, several annexes are added as additional resources.

2. Setting up Feedback and Complaint channels

2.1 Introduction

This chapter gives guidance for setting up a community based Feedback and complaint mechanism in a Country Office.[3] It describes a step-by-step approach in which a) intended users are consulted; b) feedback channels have been set up and c) intended users are informed about the mechanism and its use. The last section also gives examples about how you can monitor the familiarity with the feedback channels.

You have chosen the right feedback channels if the following condition is met:
<u>All intended users are aware of the feedback channels, feel that they have safe and easy access to the feedback channels and know what they can use it for.</u>

2.2 Consult the community

It is recommended (and a requirement within the Core Humanitarian Standard and other standards) to consult the intended users after their preferences. This can be done during a focus group discussion or in a questionnaire for example during the needs assessment pre-ceding a project. Ensure to consult different demographic groups, as they may have different concerns and preferences, see further paragraph 2.3 sub "Consider diversity, accesibility and inclusion". The following example questions can be used.

Example questions feedback and complaint channels:

If you wanted to ask questions or raise complaints about an NGO's project, how would you feel most comfortable doing this?
  A. Face to face with a representative of the organisation
  B. Through a community committee
  C. By telephone
  D. By writing and posting in a physical suggestion box, placed in the community
  E. In community meetings
  F. By telephone but anonymous
  G. Online through social media
  H. I don't' feel comfortable asking questions or raising complaints in any way.
  I. Other, namely: ...
What barriers do you see in the community which could prevent people from using some of the channels above?
Are there any feedback and complaint channels already used in the community?

2.3 Choose multiple channels

Include at least one channel that is fit for dealing with sensitive complaints.
Safe access to the complaint channels is not only a matter of physical security, but underlines how important it is for the system to admit sensitive complaints. In order to facilitate both sensitive and non-sensitive complaints, two different means of submitting complaints are normally necessary. While the non-sensitive complaints could be directed to open sessions (for example a regular community meeting), more sensitive complaints should be granted more confidential and private access.

If possible consider to join a feedback and complaint channel that is already used in the community.

To find out about existing feedback and complaint channels the following question towards communities can be used: "Are there any examples of active complaint channels in the community?" It is also possible to join hand with other NGOs working in the same community. Joining an existing channel has the potential benefit of familiarity within the community and lower barriers for people to start using it.

Consider diversity, accessibility and inclusion
Applicable means of submitting complaints differ and it is required to consider the level of literacy among the users, the type of user, special protection issues for vulnerable people or minorities, gender, age, the type of programme, distances / geography, ethnic tensions and so on. A maximum distance for travelling should also be set. Otherwise, the complaint channel will discriminate those living far away and cannot travel due to health, age, time or financial reasons. The area of the complaint mechanism needs to be safe for all to access. Alternatively, other access entry points should be suggested to avoid de facto discrimination.

Examples of adequate and inadequate considerations of diversity, accesibility and inclusion

Situation of community members	Adequate	Inadequate
Airtime is hardly affordable	One of the complaint channels is a hotline. It is free of charge	The hotline is paid for
Different languages are spoken	The complaint channels are available in multiple languages	Only one language can be used
There is a variety of religious backgrounds. Some Muslim women do not feel comfortable to enter the church	A complaint box is placed in a location where everyone feels comfortable	The only complaint box is placed at the church
Some people use a wheelchair	There are multiple ways to submit a complaint, including via phone	The only mehtod to submit complaints is in person in an office that cannot be accessed per wheelchair
The community is partly illiterate	Information about the complaint channels and using them does not require literacy	The only complaint channel is to submit a complaint in writing. Information aobut the channel is only explained in writing
The community includes children	Children have been consulted on the mechanism. They know that they can give feedback as well. There is a special complaint box that they co-designed and use.	Children do not know that they can provide feedback. The complaint channels (hotline and complaint box) are not accessible for children. Children are too short to reach the box.

Example feedback channels

Box. A sealed box hanging in the village or in front of the office, which is emptied regularly by staff. It should be clear how often it is emptied. This, though, allows only written complaints and does not enable the agency to provide assistance and guidance on what the procedures are.

Office hours. Fixed days and/or hours where the office is open to receiving complaints. This is a very open and transparent access, but could as well generate too much noise and crowds in the office.

Visiting staff. Field staff visiting project implementation areas on fixed days to facilitate complaints.

Online. Allow complaints submission through the internet, via a form on the website or social media. This requires access to the internet, but usable especially for partner complaints.

Mail, phone. Allow complaints submission through posted mail or by phone. Ensure that the phone is answered, or people are being called back soon. A free number will lower the barriers that people experience to call.

Access to managers. Direct access to talk with higher managers. This is relevant for the most sensitive complaints, and is a very accountable and dignifying system, but with large numbers, could take up much time.

Community meetings. Facilitated through weekly community meetings, where issues can be discussed and potentially addressed on the spot. This method is best for more general issues and does not allow for sensitive issues to be raised.

Community committee. A well instructed community committee can be a good way to receive non-sensitive feedback. It can also serve as a first filter so that only complaints relevant to Dorcas come to. This can in particular be an option if there is the fear of being over-burdened by complaints of dissatisfied "customers" that simply wish more. Informing potential complainants about which complaints are legitimate can also help avoid this.

Booths with voice recorder. Having a small cabin in a community where a community volunteer can provide access for the community to a voice recorder. This innovative way may attract more interest from the community to respond. Good volunteer training and data security are essential.

Other local complaint channels. There may be other complaint channels that are frequently used within a community

Complaint channels together with other NGOs. If multiple NGOs are working in the same location it is recommended to consider the potential added value of setting up one integrated complaint mechanisms.

A combination of different means is advisable. Normally, it is possible to choose means where the benefits and strengths of one cover for the drawbacks of the other. Use your imagination and involve staff and beneficiaries in the decision.

Anonymous complaints

Anonymous complaints can be more difficult to investigate and are sometimes linked to rumours. In some contexts, though, allowing for anonymous complaints does provide complainants the extra feeling of safety needed to voice relevant issues.[4] Dorcas leaves this decision on this to its country offices, but with the suggestion to consider allowing the submission of anonymous complaints. If anonymous complaints are allowed it is helpful to communicate the benefits and limitations to the intended users of the complaint mechanism.

2.4 Share information about the feedback and complaint mechanism

To ensure that intended users will feel they have safe and easy access to the complaint channels it is important to share adequate and sufficient information about the complaint mechanism.

The following information should be included:
- What the feedback mechanism can be used for. The feedback mechanism can be used for 1. Positive feedback; 2. Suggestions; 3. Complaints.
- What can be complained about. Complaints can be both operational as well as serious complaints. It needs to be explicitly mentioned that complaints can be made about sexual exploitation and abuse.
- What constitutes a valid complaint. How are valid criticism and complaints to be distinguished from non-valid ones? For example anonymous complaints or rumours. (Ensure that valid complaints about other organisations are referred).
- Who can file a complaint. For example beneficiaries, possible beneficiaries, stakeholders affected by the activities, media, community members, other NGOs.
- How to submit a complaint, through which channels.
- Confidentiality of the complaint.
- The policy of non-retaliation. If you make a complaint no Dorcas staff is allowed to let this have any adverse consequences towards the complainant.
- Limitations in case an anonymous complaint is handed it. For example, it is allowed but harder to investigate.
- Standards of staff behaviour that if not upheld can be complained about: Aid is provided free of charge for example. These standards are defined in the Code of Conduct.
- The duty that Dorcas has to respond to an officially filed complaint.
- The expected time it takes until a first response is given, ideally this is within one week.

Sharing information about the complaint mechanism could take the following forms. It is recommended to use a mix of communication methods:
- Informing face-to-face during a community meeting or home visit or session in a community center. For most projects this is the preferred option.
- Informing in writing and with pictograms through a leaflet, business card and/or posters. This is a recommended addition to the first option. It can also be useful during large-scale and/or one-off distributions during which there is no time for substantial conversation. Components of this leaflet could be:
  o A summary of the Dorcas Code of Conduct
  o Pictograms on key behaviours in the Code of conduct such as a) No abuse; b) Provision of aid is free of charge; c) no favouritism based on religion (or anything else)
  o Pictograms on how the complaint mechanism works.
  o Some example leaflets and pictograms can be found in the complaints mechanism folder, the majority have been downloaded from https://www.chsalliance.org/get-support/resource/1249/. Please do not use these without consulting the publishing organisation.

2.5 Monitor familiarity with and use of the feedback channels

It is recommended to also monitor familiarity with and use of the feedback channels. Actual use can obviously be monitored by counting the number of cases added to the complaints register in a given period of time. It is important to note that the absence of feedback and complaints could be attributed to excellent programming, but it is much more likely that people are simply not aware of the relevant feedback channels. The general consensus is that it is **better to have some complaints than none**.

In order for MEAL/programs staff to measure familiarity with the complaint mechanisms among potential users, a choice could be made from one or several of the following example questions. They are derived from the Core Humanitarian Standard assessment regarding indicator 5.1 and from the ECHO Protection Mainstreaming Indicators.

CHS 5.1	Do you know how to complain if there are any problems with the project or staff?	Yes / No
ECHO Q18	Have you or anyone you know in your community ever raised any concern on the assistance you received to the NGO using one of the following mechanisms: 1. Talk directly to NGO staff 2. Use the dedicated NGO desk 3. Use the complaints box 4. Hotlines.	Yes / No
ECHO Q18.1	If yes – are you satisfied with the response you have received?	Yes / No / Partially / Response never received

3. Procedure to handle feedback and complaints

3.1 Introduction

This chapter describes how within Dorcas feedback and complaints need to be handled. Paragraph 3.2 deals with definitions; paragraph 3.3 describes the general principles that are applied when handling feedback and complaints. Paragraph 3.4 until 3.8 describe **a step-by-step approach** from the first moment a Dorcas staff member is contacted until closure of a case. Each paragraph is dedicated to a different step. Step 1 is about guiding feedback and complaints to the formal mechanism. Step 2 is about registering formal complaints. Step 3 concerns investigations. Step 4 concerns taking a decision and closing a case. Step 5 is an optional step and is about the possibility for appeals.

3.2 Definitions

The procedure outlined below can handle feedback as well as complaints. We can define them as follows:

- **Feedback** is the return of information about a result, for example a provided product or service or the performance by a person. An example of positive feedback is a thank you letter. Negative feedback can constitute a complaint. Dorcas is open to any kind of feedback, because we can learn from it what works well and what does not.

- **Requests** are questions that ask Dorcas to come into action. For example, to assist a specific household or to provide a particular type of follow-up assistance. A request requires consideration and a response. It depends on the type of request if Dorcas is able and willing to fulfil it.

- A **complaint** is an expression of dissatisfaction or discontent. In the experience of the complainant something went wrong within a project or other activities under the responsibility of Dorcas, due to the actions of employees or the functioning of the organization of Dorcas itself or one of its partners. Complaints can concern the content of Dorcas' work and/or the behaviour of Dorcas' employees, volunteers, consultants and/or employees of partner organisations. Examples that concern the **content or our work** could be:

  a. beneficiaries who are dissatisfied with the aid received or disagree with the beneficiary selection;
  b. visitors to Dorcas stores who disagree with the opening times or the price of a product;
  c. donors who consider a letter or campaign inappropriate or that they are insufficiently informed about a project.

When complaints concern behaviour we speak about (alleged) misconduct. Standards for appropriate conduct and what constitutes **misconduct** are defined in the Dorcas Code of Conduct. Behaviours that are considered **gross misconduct** usually have more severe implications for the complainant and result in stronger disciplinary measures. Examples of gross misconduct are:

  a. child abuse;
  b. sexual exploitation and abuse;

c. physical abuse;
d. discrimination;
e. harassment;
f. fraud and corruption.

3.3 General principles

While we describe in more detail how feedback and complaints should be handled. There are also some general principles that always apply. We have outlined them below.

- **Dorcas welcomes feedback and complaints!** As Dorcas we consider it important that feedback and complaints are welcome. Always have an open attitude and realize that feedback and complaints give Dorcas an opportunity to improve.
- **People are at the centre.** As Dorcas we want to keep an eye on people's interest. This has a variety of consequences for how we deal with feedback and complaints:
  o We handle privacy-sensitive information with care.
  o We want to have a proactive attitude and communication with people using the feedback and complaints mechanism.
  o In case of a complaint regarding (gross) misconduct, we deal correctly with both the complainant and the person that has been accused. While taking the complainant seriously we use the principle: **Innocent until proven guilty.**
- **Be quick but don't hurry.** We consider it important to provide people with clarity by quick follow-up on feedback and complaints. Simultaneously we understand that careful and correct follow-up is important and that in certain situations more time is needed. We have therefore formulated the following lead times:
  o **Initial response within a week**. In many cases a case can be completely closed within a week. If in case of a complaint investigations are required and more time is needed, the complainant should at least receive a confirmation that indicates next steps and their timeline.
  o **Final response within three months.** For more complex cases where investigations are required more time might be needed. Dorcas aims however to close any case within three months after it was first brought up.
- **Documentation.** Feedback and complaints need documentation for good follow-up, insight and learning. Central to the way in which Dorcas approaches this documentation is the Complaint Reporting Form (Annex A). This form can be used for multiple purposes:
  o It can be used as one of the complaint channels (see chapter 2) if a complainant wants to register a formal complaint and report it to the Integrity Focal Point
  o It is used by Dorcas staff to report gross misconduct and constant situations to the Integrity Focal Point
  o It is used by the Integrity Focal Point to inform the relevant manager that needs to decide on complaints
  o It is used by the relevant manager to draw up findings of investigations and measures taken and report back to the Integrity Focal Point.

  The other relevant documentation tool is the Feedback and complaints Register (see for an example Annex B). This is used by the IFP to register and keep track of all cases and forms the basis of quarterly reporting.
- **Comply or explain.** Follow the attached procedures and be able to explain if that is not possible. Examples where it may be needed to slightly deviate from the step-by-step approach as outlined below are for example the situation where there is a committee operated by or

with the community that deals with feedback and/or complaints. Or the situation in which the decision how to deal with feedback and/or complaints is taken by an internal committee.

3.4 Handling complaints step-by-step

Phase 1: Guiding feedback and complaints to the mechanism

Feedback and complaints are not automatically handled through the complaint mechanism. A formal complaint can be made by anyone through one of the officially set up complaint channels (see chapter 2), for example through a complaint box. In many cases however, feedback or complaints are made to the Dorcas employee that people are best familiar with. When you receive, feedback, a complaint or a signal of misconduct, that isn't reported as a formal complaint yet, please follow the following steps:

1. Listen!
    a. It is often quite a relief for people to be able to tell their story and feel really heard.
    b. All feedback and complaints are welcome. Also complaints that do not concern Dorcas programs or Dorcas employees are listened to.
    c. The aim of the listening must also be to understand the person with feedback or a complaint well, so that the correct follow-up steps can be determined (jointly). (so the goal is not to only let off steam and then leave the issue unaddressed).
    d. Good communication skills are necessary for a successful conversation. Which skills these are depends on culture, among other things. It is up to every employee to keep themselves sharp and every manager to ensure that his or her employees have sufficiently developed these skills and keep them on track. This is not only relevant for handling feedback and complaints, of course.
    e. If the feedback is a complaint and the person making the complaint is not the "injured party" himself, ask whether the person making the complaint can ask the injured party to submit the complaint himself. If this is not possible, it is still good to hear the story. Be careful with privacy data, from both the person making the report and the person concerned. Even if the injured party has not been in touch her- or himself, still the complaint needs follow-up.

2. Determine the next step:
    a. Is the feedback or complaint not about a Dorcas project or Dorcas staff? → **Refer**
        i. If the feedback or complaint is about another NGO, it is preferable not to transfer the feedback or complaint, but to direct the person with the feedback or complaint to the feedback and complaint mechanism of the other NGO. Otherwise Dorcas will remain in between, which is likely lead to delays and inefficiency, and potentially miscommunication.
        ii. When the person with the feedback or complaint cannot go anywhere else, it is important to clarify what Dorcas can and cannot mean. Create clear and realistic expectations.
        iii. It is important to always listen carefully to the person with the feedback or complaint and to carefully refer and/or inform her or him. This may limit their feeling of being sent "from pillar to post".
    b. Does it concern positive feedback? → Share with the relevant stakeholders, for example staff or project department. After that no further actions are required.
    c. Does it concern a complaint about gross misconduct (see paragraph 3.3), related to the behaviour of Dorcas or partner staff? → **Continue to step 3.**

    d. Doest it concern a complaint related to the content of our work and can the problem be solved? → **Solve**!

        i. Solving is sometimes limited to the complainant being able to express her- or himself and being listened to. Sometimes there is no need for further action.

        ii. Solving can sometimes be done by person with the complaint him- or herself. This may be empowering. It can also be done jointly, assisted by Dorcas.

        iii. An external confidential advisor also primarily advises the complainant to try to resolve the situation her/himself.

        iv. Sometimes a problem cannot be solved, but a good explanation of why this cannot be done is sufficient for a complainant. This means that further (formal) steps are no longer necessary.

        v. However, remain alert to the complainant's interests and let her or him determine whether the solution is appropriate and whether the complaint has been resolved.

    e. Is the person with the complaint not satisfied with the proposed solution? → **Continue to step 3**.

3. Inform the complainant of the possibility of submitting a formal complaint:

    a. This can be done via one of the available channels: physical complaint box, form (Annex A), app, e-mail, etc., see chapter 2.

    b. The complainant's right to submit an anonymous complaint must always be respected.

    c. Help the complainant to submit if desired.

    d. Reassure the complainant about Dorcas' policy of non-retaliation. The complainant should not experience negative effects that are the result of filing a complaint. If this would be the case this needs to be reported. → **Continue to step 6**.

4. Staff members must always report complaints in the following situations. Fill the Complaint reporting form (see Annex A) and share it with the IFP.

    a. A complaint that constitutes gross misconduct (see paragraph 3.3).

    b. Constant situations (such as not functioning employees or systems, unsafe situation or culture).

    c. If it concerns a complaint about the IFP, the employee reports this immediately to the manager of the IFP. → **Continue to step 6**.

5. Learn! It is important that we use every relevant signal to reflect on our own system and actions and to learn from this where possible. The way we learn can't be fixed in a procedure, it is up to every separate part of the organization to organize this in an accurate way.

6. The IFP receives the complaint via one of the complaint channels (see chapter 2). For CO this is the CO Integrity Focal Point (CO IFP). For IO this is by the coordinating Integrity Focal Point or IO IFP. Both direct complaints (step 3) or staff reports regarding complaints (step 4) are followed up upon by the IFP.
    a. If the complaint comes in (via a different channel) to an employee other than the IFP, they will forward it, unless it concerns a complaint about the IFP.
    b. If it concerns a complaint about the IFP, the employee reports this immediately to the manager of the IFP. From then on, it will take over the role of the IFP.

7. The IFP registers the complaint in the local Complaints Register (see example in Annex B)
    a. The Complaints Register is kept in accordance with the relevant privacy regulation. Not keeping up with these rules and insufficient regard for the privacy and safety of those involved may create additional risks. See for example the following (not complete) overview:

Situation	Possible risk
A Dorcas manager confronts a colleague accused of misconduct and shares details on the complainant	The accused colleague threatens the complainant who withdraws the accusation
	The accused colleague confesses the incident while not disclosing other relevant incidents
A Dorcas IFP shares "in confidence" with a befriended colleague that there has been an accusation against another staff member	A rumour about the accused staff member spreads in the office and in the community. The accused staff member does not feel safe anymore even though investigations do not confirm the accusation

8. The IFP checks whether the complaint falls under the Whistleblowing Policy:
    a. In that case, (s)he applies the Whistleblowing Policy.
9. The IFP forwards the complaint (Annex A) to the manager of the relevant employee or organizational unit:
    a. Before the complaint is forwarded, the IFP assesses whether the complaint must be anonymized before it is forwarded, to guarantee the privacy and security of one or more of the parties involved.
    b. The manager is responsible for the correct handling of the complaint. He can be assisted in this by, for example, the Integrity Focal Point and can be advised by the Coordinating Integrity Focal Point at Dorcas International Office.

10. The manager contacts the complainant to clarify the complaint:
    a. Listening is also crucial here (see above).
    b. In particular, also ask what is a desirable outcome for the complainant. Sometimes reporting is sufficient, sometimes something can be resolved, sometimes further steps are needed.
    c. Proactively inform whether medical or psychological counselling is desirable and, if necessary, provide support in applying for this type of counselling. If budget is an issue, reach out to the Coordinating Integrity Focal Point at IO.
11. The manager guides the complainant to professional care if necessary.
12. The manager informs the relevant contact point at the donor (if any) about any potential case of gross misconduct, without sharing personal information.
    a. In case of Dutch Relief Alliance funding, consult the DRA Integrity guidance note.
    b. Consider the appropriate moment to inform the donor. Some donors may have specific requirements in this regard.
13. The manager conducts further investigation:
    a. Hear both sides!
      i. Be very careful with the complainant's details! Apply the privacy regulations, and do not share more (confidential) information than is necessary for proper handling of the complaint. Coordinate with the complainant what information can be shared.
      ii. Also be alert to the safety of the complainant and the accused. Avoid prejudices and early sanctions or other adverse effects.
    b. This step can optionally be carried out by a complaints committee (internal or external). For the time being, this is not a mandatory step, but it is up to the relevant organizational unit to determine and set this up.
    c. In cases of gross misconduct, the investigation can be done by an independent external investigator.
    d. Consult external resources when conducting investigations, such as the CHS Alliance Guidelines for Investigations (Annex C).

Phase 4: Decision, follow-up and closure

14. The manager takes a decision on the complaint and determines the next steps:
    a. Where possible this is aimed at solving the situation and preventing (further) damage.
    b. The manager can take disciplinary action towards staff in line with the disciplinary procedure and guidelines. In case of gross misconduct this implies also informing the Executive Board. See for more information the disciplinary procedure and guidelines.

15. The manager informs the complainant and the defendant about the outcome:
    a. He informs the complainant and the accused in an appropriate manner of how the complaint has been assessed and which follow-up steps are being taken.
    b. If an investigation report has been drawn up, it will be submitted (possibly partly anonymously) to the complainant and the defendants will submit a response (if this is appropriate in the situation, if the complainant and / or the defendants are illiterate, for example) the results discussed only orally). This response is also recorded.
    c. With regard to complaints concerning gross misconduct (see paragraph 3.3), the supervisor proactively points out further possible actions if the complainant or accused person is not satisfied with the outcome. There are two options:
       i. The supervisor of the supervisor who has handled the complaint, who primarily assesses whether the complaint has been handled correctly. If it concerns a member of the Executive Board, the complaint can be submitted to the Supervisory Board for review. (procedure 2 is repeated here)
       ii. A formal external procedure, if available. (see procedure 3)

16. The manager reports the outcome of the investigations and decisions to the Integrity Focal Point by updating the Reporting of a Complaint template (Annex A). In a complex case a separate report for the investigations might be needed.

17. Learn! (see Step 5 above)

In some countries there are one or more possibilities for appeal via an external committee. In this case the next steps are relevant:

18. The Integrity Focal Point is the first point of contact for external committees. The Integrity Focal Point coordinates the internal handling of the appeal.
19. The external committee conducts further investigations in accordance with its own procedure and draws up a report in which a judgement of the complaint and if relevant with advice to Dorcas, is given.
20. If the advice is not binding, the manager of the defendant or organizational department will determine further steps based on the report of the committee. If the rapport is binding it will process the advice accordingly.
21. The manager informs the complainants and accused persons about next steps, if this has not already been done by the complaints committee.
22. Manager informs Integrity Focal Point with the (updated) Reporting of a Complaint template (Annex A)
23. Learn! (see Step 5 above)

4. Monitoring and reporting

Quarterly reporting

Reports are received every quarter on the complaints received and handled, with an emphasis on the common thread and lessons learned. Reports are made to:
- The Country Director: by the Integrity Focal Point CO regarding complaints within the relevant country office. The Country Director includes this in his Quarterly Country Progress Report to the Board of Directors.
- The NL-MT: by the Integrity Focal Point IO on complaints within the Netherlands. Part of the Management Dashboard.
- The IMT: by the Integrity Focal Point IO on all complaints within Dorcas. Part of the Quarterly Report to the IMT.

Annex A. Complaint reporting form

	Example: 2021-1 (Year-case). To be filled by IFP.
Date of report:	
Country Office/Department:	
Integrity Focal Point (name)	
E-mail Integrity Focal Point:	
Telephone Integrity Focal Point:	
Relevant Manager/Director:	
Type of Report:	*First / Second or subsequent update report / Final*
Country of incident:	
Initial date of incident:	
Type of incident	*Fraud / Sexual exploitation or abuse / Other*
Estimated amount of funds lost (if any, in case of fraud):	
Name, gender age and contact information complainant and person(s) affected (this could be the same)	***BE CAREFUL IN SHARING THIS INFORMATION***
Description of the incident:	
Status of investigations:	*Starting up / Ongoing / Closed*
Date investigations start(ed):	
Date investigations closed:	
Outcome of investigations:	*Suspicions confirmed / invalidated / unable to verify*
What measures have been taken for alleged complainant / victim:	
What disciplinary measures were taken against alleged accused / perpetrator?	*For example staff member suspended / fired / no action / warning*
What other measures were taken?	*For example towards involved entities, additional preventive measures, etc.*
Initial response time (days)	*Time between first report and first response to complaint*
Final response time (days)	*Time between first report and final response*

All questions in the form need to be answered. In an early stage it might not be possible yet to do so, for example because investigations have not yet been concluded. Where necessary use "Not Applicable".

Annex B. Example Complaints Register

[See separate Excel file]

Annex C. Overview of External Resources

- Guidelines for Investigations (developed by CHS Alliance, attached in English, also available in Arabic, French and Spanish)
- Add guidance for child-friendly complaint channels (via Child Protection Minimum Standards)