

Feedback and Complaints Policy

Document information

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Related documents

- Integrity Framework
- Code of Conduct
- Feedback & Complaints Manual for Managers
- Feedback & Complaints Manual for Integrity Focal Points
- Community Based Feedback & Complaint Mechanism (CBFCM) Manual

Index

1. Introduction

- 1.1. Objective
- 1.2. Scope
- 1.3. Manuals
- 1.4. Types of interactions
- 1.5. Types of complaints
- 1.6. Roles and responsibilities
- 1.7. Adjustments to processes
- 1.8. Documentation requirements
- 1.9. Financial fraud or corruption
- 1.10. Appeals Commission
- 1.11. Reading guide

2. Feedback and complaint channels

- 2.1. Channels
- 2.2. Accessibility principle
- 2.3. Required channels
- 2.4. Principles and minimum requirements for handling complaints

3. Procedure for dealing with feedback and complaints

- 3.1. Introduction to the procedure
- 3.2. Appropriate manager
- 3.3. Starting procedure
- 3.4. Type 1 procedure
- 3.5. Type 2 procedure
- 3.6. Type 3 procedure
- 3.7. Appeals procedure

4. Monitoring and reporting

Annexes

Annex I: Glossary of terms

Annex II: Workflows

Annex III: Complaint reporting form

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 Policy. The Feedback and Complaint Policy is part of the Dorcas Integrity Framework.

1.1. Objective

The objective of this policy 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 followup. Every user of the feedback and complaint mechanism receives an adequate response.
- 4. Dorcas reports on and learns from feedback and complaints.

1.2. Scope

The policy 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). Particular attention is paid to setting up effective feedback and complaint mechanisms for project participants.

With regard to projects implemented in countries where Dorcas works, the Dorcas country office or partner organisation ensures that feedback and complaint mechanisms are in place. These mechanisms should be appropriate to the local context, and can be locally-led and community based. The principles and minimum requirements (see section 2.4) always apply. Operating a feedback and complaint mechanism is also required in the Partnership Agreement.

1.3. Manuals

The Feedback and Complaints Policy sets the standards for Dorcas when it comes to dealing with feedback and complaints. It is not intended as a detailed guideline for personnel who play a role in the feedback and complaints process. The following manuals give further substance and instruction for relevant key personnel:

- Manual for Managers
- Manual for Integrity Focal Points (IFP's)
- Community Based Feedback & Complaint Mechanism (CBFCM) Manual



1.4. Types of interactions

This document applies to all types of interactions: feedback, ideas, questions, requests, reported issues, allegations and complaints. These are summarised using the term 'feedback and complaints'. In chapter 3, these are divided into Type 1, Type 2 and Type 3 complaints.

If through the Feedback and Complaints mechanism data breaches and/or security incidents are reported, they must be followed up in parallel through the relevant processes outside of this Policy and the Integrity Framework.

1.5. Types of complaints

Dorcas distinguishes between three types of feedback and complaints as indicated in Table 1.

Table 1: Division of types of feedback and complaints

Туре	Description	
Type 1	Feedback and complaints not indicating misconduct ¹	
Type 2	 Escalated Type 1 complaints Complaints indicating misconduct (except gross misconduct) 	
Type 3	Complaints indicating gross misconduct ²	

1.6. Roles and responsibilities

There are different categories of personnel within Dorcas with regard to feedback and complaints. In Table 2 a general overview of the responsibilities is indicated. A detailed overview of the assigned tasks in the complaint handling process is included in Chapter 3.

Table 2: Division of roles and responsibilities

Role	General responsibilities	
Manager (Country Directors, department managers, project leaders, shop managers)	 Maintain a culture of openness and sensitivity towards feedback and complaints Set up effective feedback and complaints mechanisms Investigate and address complaints (depending on the type of complaint) 	
Integrity Officer	Monitor and guide the set-up of effective feedback and complaints mechanisms	

¹ Misconduct is defined as behaviour that violates the Dorcas Code of Conduct.

² Gross misconduct is behaviour that severely violates the Code of Conduct, including, but not limited to, child abuse, sexual exploitation and abuse, physical abuse, discrimination, fraud and corruption.

	 Receive, assess and forward complaints appropriate to their type (Type 1-2-3) Register, oversee and investigate complaints (depending on the type of complaint) Register, oversee and investigate appeals 	
Country Integrity Focal Point (IFP)	 Monitor and guide the set-up of effective feedback and complaints mechanisms Register, oversee and investigate complaints (depending on the type of complaint) 	
Complaints Liaison (CL)	 Monitor IO-level feedback and complaints mechanisms Receive, register and forward IO-based complaints appropriate to their type 	
Appeals Commission	Decide on appeals as part of the appeals procedure	
Other personnel	Forward feedback and complaints as appropriate	

1.7. Adjustments to the processes

The process descriptions outlined in chapter 3 may be subject to change at the discretion of the Integrity Officer acting together with the Quality Manager. Such adjustments do not require approval from the IMT unless they result in substantial changes in procedure.

1.8. Documentation requirements

The Feedback & Complaints Policy requires registration and documentation of all feedback and complaints (type 1, 2 and 3). Type 1 requires a basic documentation while types 2 and 3 require a more elaborate recording and documentation.

To register complaints, each Dorcas office is required to maintain a complaints register using the Excel format available on the intranet. This is combined with the complaint reporting form for each individual type 2 and type 3 complaint (Annex III). Alternatively, a secure digital method may be used for the registration of complaints in so far as this has been approved by the Quality Manager.

Type 3 complaints that relate to DRA projects or funding must be reported to the DRA in accordance with the Partnership Agreement and DRA Integrity Guidance Note. A separate form is used for this as issued by the DRA.

1.9. Financial fraud or corruption

When fraud or corruption takes a financial nature, it must be reported or escalated in line with the Dorcas Anti-Money Laundering and Terrorist Financing Policy. The same applies for any suspicions of terrorist financing or money laundering.

1.10. Appeals Commission

The Appeals Committee has as its aim to ensure that any valid appeal from a complainant is dealt with definitively by an objective body that can act without conflict of interest. The decision of the Appeals Committee is therefore final.

For appeals within Dorcas, the Appeals Committee represents that executive leadership of Dorcas. The Appeals Committee must be composed of at least three members of international management (IMT). To avoid conflict of interest, it might require that for a particular appeal, certain member(s) are temporarily replaced or a separate, ad hoc commission is set up. During appeals processes, the Appeals Committee is guided by the Integrity Officer (see section 3.7).

1.11. Reading guide

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. Feedback and complaint channels

2.1. Channels

Feedback and complaint channels are a crucial part of the mechanism to ensure the flow of feedback and complaints. For locally-led FCM for projects, the CBFCM manual details the step by step guideline on how to setup an FCM.

2.2. Accessibility principle

Feedback and complaint channels must be designed in such a way that they are accessible for the target group to share feedback and complaints with Dorcas. This accessibility principle requires that channels are known to the target group and accessible in practical, cultural and psychological terms.

It is not encouraged to set up anonymous feedback and complaint channels unless they are exclusively targeting Type 1 feedback & complaints.

2.3. Required channels

Dorcas offices: Each Dorcas office must have at least one effective feedback and complaint channel aimed at Dorcas employees and volunteers.

Implementation projects: Each Dorcas project, whether implemented by a partner or not, must have at least one effective feedback and complaint channel aimed at the project participants and/or community.

Dorcas shops: Each Dorcas shop must have at least one effective feedback and complaint channel. This channel can also be the online IO-facilitated complaint form.

2.4. Principles and minimum requirements for handling complaints

As feedback and complaint channels may differ across Dorcas, especially at project-level, there are principles and minimum requirements for handling feedback and complaints to ensure accountability and quality. These apply at all levels of the organisation, including at international office, country offices, shops and in projects.

The principles that apply to all FCM, are:

- Feedback and complaints are always welcomed and addressed.
- FCM channels are actively communicated and promoted to all relevant actors (e.g. project participants, community members, staff, volunteers, partners and stakeholders).
- All feedback and complaints received through FCM channels is documented and well recorded to ensure quality, transparency and confidentiality.

The **minimum requirements** for handling complaints are specific to the typology of complaints (see section 1.5). The table below details the minimum requirements per type of complaint.

Type 1	 Complaints and feedback are documented in a complaint register / logbook. Used for learning and adaptation in project cycle. (PCM)

Type 2 Complaints are documented in a complaint reporting form and a complaint register / logbook. • For complaints in Dorcas countries, the Country Integrity Focal Point is informed of all type 2 complaints. For complaints in the Netherlands, the Integrity Officer is informed of all type 2 complaints. An independent role (e.g. an integrity officer) within the entity that handles the complaint (e.g. community, partner organisation, Dorcas country office or Dorcas international office), reviews and approves the complaint reporting form before the complaint is being handled by the appropriate manager. • The independent role (as indicated in the previous statement) monitors the complaint handling process. • The complainant can start an appeal procedure after the complaint has been handled. Appeals can be made known to the same entity, or another entity: partner organisation, Dorcas country office, Dorcas international office. Type 3 Complaints are documented in a complaint reporting form and a complaint register / logbook. • The (Country) Integrity Focal Point and Dorcas Integrity Officer are informed immediately of all type 3 complaints. • The Dorcas Integrity Officer informs the Executive Board of Dorcas, as well as donors (if applicable). The Dorcas Integrity Officer investigates the complaint and provides written advice to the appropriate manager regarding the outcome of the investigation. In case of partner organisation FCM: the Dorcas Integrity Officer is involved in the planning of the handling process by the PO to ensure appropriate follow up. • The complainant can start an appeals procedure after the complaint has been handled. Appeals can be made known to the same entity or another entity: partner organisation, Dorcas country office, Dorcas international office. **Appeals** Appeals are documented in a complaint reporting form and a complaint register / logbook. An appeal cannot be handled by the same entity (community, partner organisation, or Dorcas country office) that handled the original complaint.

An appeals committee decides on the appeal.

• The appeal is investigated by an independent role within the entity that handles the appeal (e.g. an integrity officer), and provides a written advice to an appeals

committee.

3. Dorcas procedure for dealing with feedback and complaints

3.1. Introduction to the procedure

This chapter describes the internal Dorcas procedure for handling feedback and complaints within the Dorcas international office and country offices. It does not directly apply to other entities (e.g. partner organisations, communities), but a similar process can be used by them, as long as the principles and minimum requirements (see section 2.4) are applied.

The procedure consists of two to three parts:

- The starting procedure which applies to all types of feedback and complaints (section 3.4)
- A subsequent type-specific procedure (section 3.5-3.7)
- Optional: an appeals procedure (section 3.8)

The type-specific part depends on the type of the feedback or complaint. For purposes of clarity, 'feedback and complaints' are shortened to 'complaints' in the remainder of this chapter. A visualisation of the procedures can be found in Annex II.

3.2. Appropriate manager

In this procedure, frequent reference is made to the 'appropriate manager'. This is defined as the manager closest to the matter of the feedback or complaint and therefore most suitable and equipped to resolve it, or the manager of that manager in cases of perceived (potential) conflicts of interest. Such conflicts of interest may arise when the manager has a personal interest in the outcome of the complaint or may for other reasons not be reasonably expected to form an objective and independent opinion on the matter. The Integrity Focal Point can assist in determining whether something carries a (potential) conflict of interest.

3.3. Starting procedure

Starting proce	dure	Timeline	
1. A complain	A complaint is received through a complaint channel		
he/she con complaint of misconduc a) In r C b) In	plaint was received directly by the Integrity Officer, attinues with step 3. Any other person receiving the considers whether the complaint possibly relates to t or not: If the complaint possibly relates to misconduct, the ecipient should forward the complaint to the Integrity Officer (who continues with step 3); If the complaint does not possibly relate to misconduct, the recipient should continue immediately with the Type 1 process.	Within 1 working day after complaint received	

 3. The Integrity Officer assesses the nature of the complaint and initiates either the Type 1, Type 2 or Type 3 process: a) For Type 1 complaints, the Integrity Officer continues with the Type 1 process acting as the complaint recipient. b) For Type 2 complaints, the Integrity Officer forwards the complaint to the IFP or CL to start the Type 2 process. c) For Type 3 complaints, the Integrity Officer continues with step 4. 	Within 1 working day after Integrity Officer receives complaint
 4. The Integrity Officer considers whether the complaint potentially relates to fraud or corruption with a financial dimension or to money laundering or terrorist financing: a) If so, or when in doubt, the Integrity Officer forwards the case to the relevant process owner in line with the Anti-Money Laundering and Terrorist Financing Policy (see section 1.9). Together, a decision is made which process is most suitable for follow-up. b) If not, the Integrity Officer continues with the Type 3 process. 	Within 1 working day after Integrity Officer receives complaint

3.4. Type 1

Type 1 feedback and complaints should be welcomed. They support Dorcas learning and improvement. Such complaints involve limited integrity and reputational risk. Handling them should be done by the appropriate manager and his staff in a pragmatic way, without registration or documentation, and with no involvement of integrity-related personnel (unless asked for). It is possible to escalate into a more formal complaint (Type 2) at any point during the process or at the end when the complainant is not satisfied with the solution.

Type 1 process	Timeline
 The complaint recipient considers whether he/she knows the appropriate manager or not. 	
2. If so, the recipient forwards the complaint to the appropriate manager (who continues with step 5)	
3. If not, the recipient forwards the complaint to the IFP or CL	
4. The IFP or CL forwards the complaint to the appropriate manager	
The manager informs the complainant about receipt of the complaint. This is not necessary if step 6 can be performed within the same timeline as this step.	Within 1 week after complaint received

6. The manager investigates and addresses the complaint (with the possibility to ask advise from the IFP or Integrity Officer), involving the complainant in the outcome Within 1 month after complaint received

3.5. Type 2

Type 2 complaints are considered a higher level of concern which may require a more formal handling process. They relate to cases that are potentially damaging for individuals and carry significant integrity and reputational risk.

Type 2 complaints are documented and registered. The appropriate manager is still in charge of the investigation and follow-up, but this is supervised by the Integrity Officer. It is possible to escalate into a Type 3 complaint at any point if the nature of the complaint fits the Type 3 procedure. The complainant can appeal the decision if he/she is not satisfied with the solution (see section 3.8).

Type 2 process	Timeline
1. The IFP or CL fills in the complaint reporting form	
2. The IFP or CL registers the complaint in Complaints Register	
3. The IFP or CL informs the complainant about receipt of the complaint as well as on Dorcas' policy of non-retaliation	Within 1 week after complaint received
4. The IFP or CL forwards the complaint reporting form to the Integrity Officer for review	
The Integrity Officer reviews and approves the complaint reporting form	
6. The IFP or CL forwards the case to the appropriate manager ³	
7. The manager contacts the complainant to clarify the complaint and guides the complainant to professional care if necessary	
8. The manager investigates and addresses the complaint, including taking disciplinary action where necessary, guided by the Manual for Managers. The Integrity Officer supervises/monitors these steps.	Within 1 month after complaint received
 The manager informs the complainant of the result. If the complainant is not satisfied, he/she can file a formal complaint. In that case, the manager continues with the appeals procedure 	
10. The manager updates the complaint reporting form and register.	

³ Refer to section 3.2 for a description of the appropriate manager.

-

11. Complaint is closed.

3.6. Type 3

Type 3 complaints are cause for major concern. They relate to cases that are potentially very damaging for individuals and carry critical integrity and reputational risk. The Integrity Officer plays a larger role here and is in charge of registration and investigation, providing formal advise to the manager as to the appropriate follow-up. The complainant can appeal the decision if he/she is not satisfied with the solution.

Ту	pe 3 process	Timeline
1.	The Integrity Officer fills in the complaint reporting form	
2.	The Integrity Officer registers the complaint in Complaints Register	
3.	The Integrity Officer contacts the complainant to clarify the complaint, informs him/her of Dorcas' policy of non-retaliation and guide him/her to professional care if necessary	Within 1 week after complaint received
4.	The Integrity Officer informs the appropriate manager of the complaint ⁴	
5.	The Integrity Officer and manager take pre-emptive steps together where necessary (for example suspension of an employee or project).	
6.	The Integrity Officer and manager inform the DRA in case the incident relates to DRA projects or funding, in accordance with the DRA Integrity Guidance note.	As soon as reasonably possible
7.	The Integrity Officer investigates the complaint and provides written advise to the manager. The Integrity Officer can ask for assistance from the manager where necessary.	
8.	Taking into account the written advice from the Integrity Officer, the manager, guided by the Manual for Managers, addresses the complaint, including taking disciplinary action where necessary.	Within 1-4 months after complaint received
9.	The manager informs the complainant of the result. If the complainant is not satisfied, he/she can file a formal complaint. In that case, the manager continues with the appeals procedure.	
10	. The manager updates the complaint reporting form and register.	

⁴ Refer to section 3.2 for a description of the appropriate manager.

3.7. Appeals

The appeals procedure is designed to provide complainants with a final recourse at Dorcas. The appeals commission decides on appeals upon advise of the Integrity Officer. After the appeal, Dorcas will only reopen cases if new and materially relevant information is provided.

Appeals process	Timeline
 The manager formally confirms with the complainant to file an appeal 	
The manager forwards the complaint file to the Integrity Officer	
3. The Integrity Officer contacts the complainant to clarify the appeal	Within 2 weeks after appeal confirmation
4. The Integrity Officer updates the complaint reporting form and register	
The Integrity Officer informs the relevant manager of the appeal, if appropriate	
 The Integrity Officer investigates the appeal and provides written advise to the Appeals Commission. The Integrity Officer can ask for assistance from the manager and/or IFP where necessary. 	Within 1 month after appeal is clarified
7. The Appeals Commission decides on the appeal.	Within 1 month after advice is provided
 The manager takes action on the decision, including taking disciplinary action where necessary. The Integrity Officer supervises/monitors these steps. 	Within 2 weeks after the decision is made
The Integrity Officer informs the complainant of the result of the appeal.	Immediately after action has been taken
10. The Integrity Officer updates the complaint reporting form and register.	
11. Complaint is closed.	

4. Monitoring and reporting

The functioning of the FCM is generally monitored by the Integrity Officer. Reports are made periodically on the complaints received and handled:

- The Integrity Focal Point reports to the Country Director regarding complaints within the relevant country office. The Country Director includes this in the Quarterly Country Progress Report to the Board of Directors.
- The Integrity Officer reports to the NL-MT on complaints within the Netherlands. This is part of the quarterly management dashboard.
- The Integrity Officer reports annually on all complaints within Dorcas to the IMT as part of the yearly IMT integrity update.
- From project level (either by partner organisation, community or project manager/officer) regular reports at least quarterly are made regarding complaints within the project. These are reported to the Country Integrity Focal Point.

Annexes

Annex I: Glossary of terms Annex II: Workflows

Annex III: Complaint reporting form

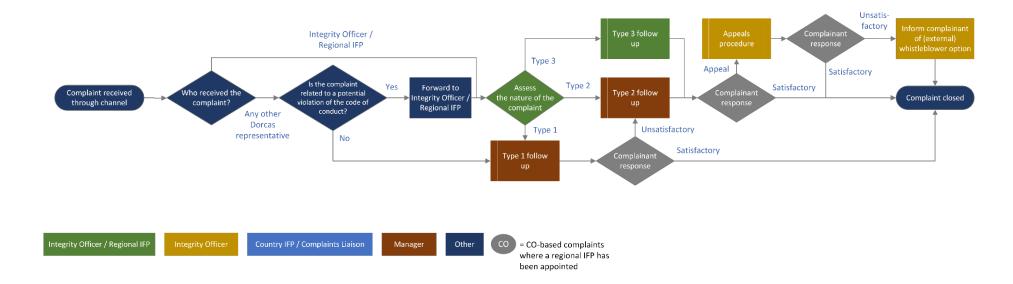
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Annex I: Definitions

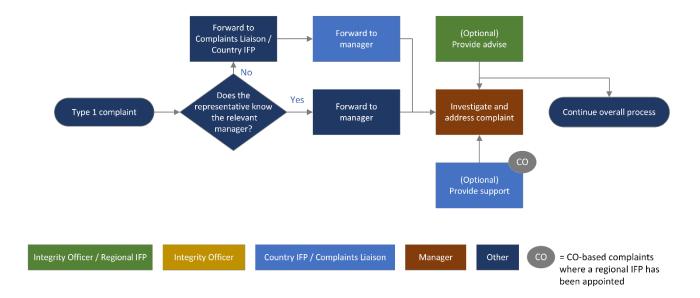
Term	Definition	
Appropriate manager	The manager closest to the matter of the feedback or complaint and therefore most suitable and equipped to resolve it, or the manager of that manager in cases of perceived (potential) conflicts of interest	
Complaint	An expression that something is wrong or unsatisfactory. Complaints can concern the content of Dorcas' work and/or the behaviour of Dorcas' employees, volunteers, consultants and/or employees of partner organisations.	
Complaints Liaison	An IO-based Dorcas employee appointed to monitor the feedback and complaints channels that are Dorcas-wide (such as the digital forms on the Dorcas website and klackten@dorcas.nl) as well as receive, register and forward IO-based complaints appropriate to their type.	
Country Integrity Focal Point (IFP)	A Dorcas employee appointed to support the Country Office with regard to integrity.	
Feedback	The return of information about a result, for example a provided product or service or the performance by a person.	
Feedback & Complaint Mechanism	A system for receiving, processing and responding to feedback and complaints	
Feedback & Complaint Channel	A channel for receiving feedback and complaints	
Gross misconduct	Behaviour that severely violates the Dorcas Code of Conduct, including, but not limited to, child abuse, sexual exploitation and abuse, physical abuse, discrimination, fraud and corruption.	
Integrity Focal Point	See 'Country Integrity Focal Point'	
Integrity Officer	A Dorcas employee appointed to oversee the implementation of the integrity programme of Dorcas as a whole. This person is can also be considered to be the Integrity Focal Point for the international office.	
Misconduct	Behaviour that violates the Dorcas Code of Conduct (see also 'Gross misconduct').	

Annex II: Workflows

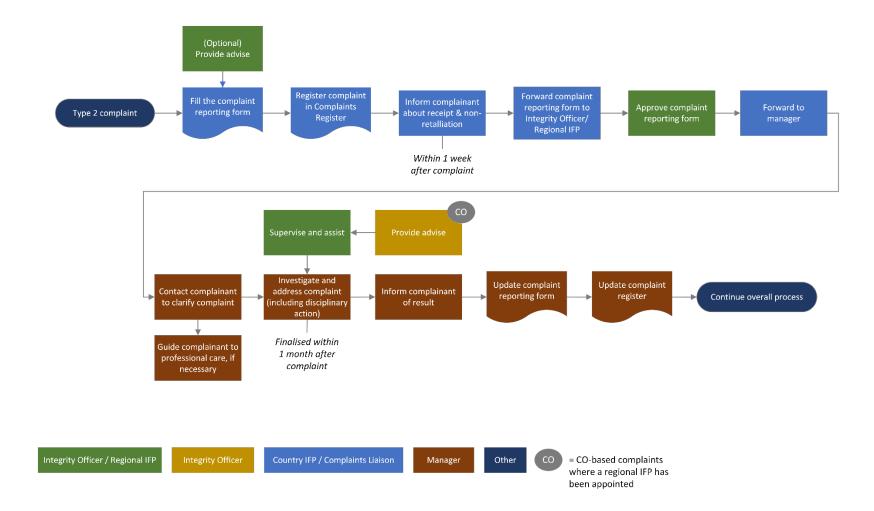
Overall process

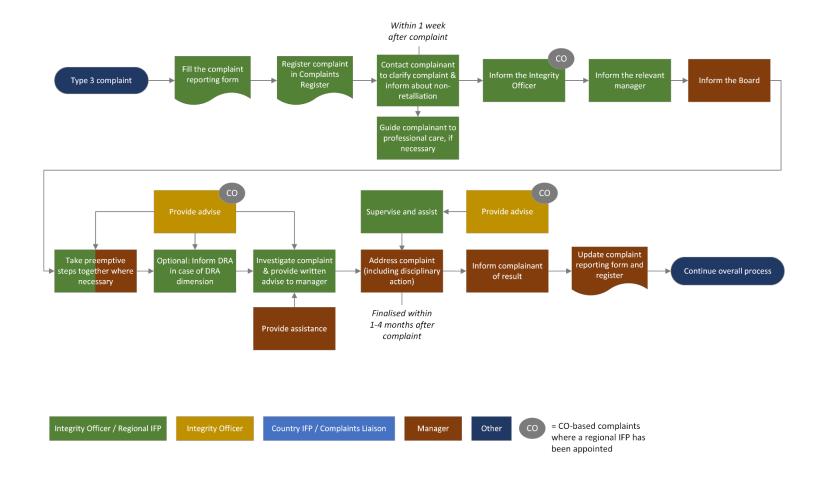


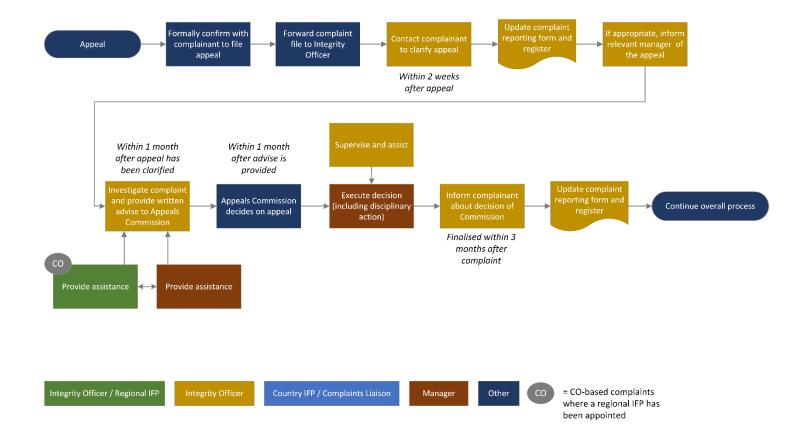
Type 1 complaint follow up



Type 2 complaint follow up







Annex III: Complaint reporting form

	Example: 2023-1 (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	BE CAREFUL IN SHARING THIS INFORMATION
information complainant and	
person(s) affected (this could be the	
same)	
Description of the incident:	
Status of investigations:	Starting up / Ongoing / Clased
Status of investigations:	Starting up / Ongoing / Closed
Date investigations start(ed):	
Date investigations closed:	Consisions confirmed / invalidated / wealth to varie.
Outcome of investigations:	Suspicions confirmed / invalidated / unable to verify
What measures have been taken for	
alleged complainant / victim:	The average staff as analog average ded / fixed / no matical /
What disciplinary measures were	For example staff member suspended / fired / no action /
taken against alleged accused / perpetrator?	warning
What other measures were taken?	For example towards involved entities, additional
what other measures were taken?	preventive measures, etc.
	preventive meusures, 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
i mai response ume (uays)	Time between just report and junariesponse

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".