PIN Policy on Community Feedback and Response Mechanisms

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People
in Need

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PIN Policy on Community Feedback and Response Mechanisms (CFRM)

A feedback mechanism is a set of procedures and tools formally established and used to allow project participants, as well as other community members and relevant stakeholders, both local or national, to provide information about their experiences with PIN or with the wider humanitarian and development system.

Receiving feedback helps PIN learn what is working and what is not working during a project. Mistakes can have serious consequences for people affected by an emergency or impoverished conditions. Sharing lessons and taking action in the course of the project means good practice can be replicated, and not-so-good practice rectified as soon as possible.[1]

1 Policy statement and commitment

Receiving feedback and responding to complaints is a fundamental part of improving PIN's accountability.
PIN establishes effective feedback mechanism in order to:

- create **trust** between PIN and its stakeholders and fulfil PIN's responsibilities toward project participants, donors, the NGO sector and society at large
- constitute an **early warning mechanism** to uncover hidden patterns, including potential patterns in misuse of power
- **give a voice** to any potential victim/survivor of misconduct by PIN staff
- protect PIN's **reputation**
- **save money** by detecting misappropriation of funds and inefficient systems

> This policy provides a set of main principles and steps that PIN follows in all its operations. Country Programs (hereinafter CPs) are expected to work with this policy and, in line with it, introduce localized policies and guidelines that provide more detailed, country specific, procedures. **PIN's CP feedback mechanisms are seen as effective if, at minimum, they meet the following minimum standard: it supports the collection, acknowledgement, analysis and response to the feedback received, thus forming a closed feedback loop**.

2 Applicability

A Community Feedback and Response Mechanism (hereinafter CFRM) must be part of every project with direct beneficiaries, implemented by PIN. If a project is implemented by a partner organization, PIN will request that the partner's CFRM adheres to the principles outlined in this policy. PIN is ready to support its partners with the set-up of a CFRM when needed. If the partner will not have CFRM in place, PIN will strive to ensure that the beneficiaries and communities with whom the partner comes into contact during implementation of the joint project will have access to the PIN CFRM or to an alternative system for reporting. Feedback pertaining to partners' activities will be regularly discussed with the partner organization's management team.

It is the responsibility of management to ensure that procedures resulting from this policy are set in accordance with the principles outlined in this policy. Exemptions should be consulted with the Head of RDD MEAL department and approved by Regional Director (RD).

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[1] Impact Measurement and Accountability in Emergencies. The Good Enough Guide. www.oxfam.org.uk/publications.

This policy must be implemented in accordance with the PIN Code of Conduct and Key Policies.

3   Levels of CFRM at PIN

PIN's Community Feedback and Response Mechanism (CFRM) operates at two integrated levels: **Institutional CFRM and Country Program CFRM**

Institutional CFRM

This is a top tier level established at the PIN HQ. It is managed by Investigations and Integrity Lead, a role established independently of the CPs and under the supervision of the RDD Director. It is technically supported by the MEAL Lead, Safeguarding advisor, and Whistleblowing focal points. It serves for communicating feedback and concerns by participants or non-participants in PIN activities, communities, suppliers, partner organizations and other stakeholders. Additionally, all appeals to review cases already handled with CP level CFRM are addressed within the Institutional level CFRM.

What is the Institutional CFRM is intended for

- Submitting concerns, complaints and feedback that, for any reason, are more appropriately addressed directly to PIN HQ. While Country Programmes remain the primary channel for receiving and resolving feedback, the HQ mechanism can be used when necessary, including for raising concerns about PIN's overall integrity or compliance, serious environmental damages caused by our activities, adverse effects on communities, and other high-level submissions from individuals, organisations, or institutions.

- Submitting appeals if complainant believes a complaint handled at Country Programme level was not managed correctly or fairly. A complainant who considers that the complaint handling procedure was implemented incorrectly and/or a mistake has been made may request a review of their case and may lodge an appeal. To this end, an appeal request may be submitted, within 20 calendar days of the communication informing them of the result of the resolution of complaint.

Institutional CFRM uses the email address whistleblowing@pinf.cz and information is publicly accessible at Feedback and Concerns webpage. All submissions should be in writing, providing all relevant details. The messages are received, categorized, logged, reviewed and investigated, as appropriate, by the **Integrity and Investigations Lead**, supported by the MEAL Lead, Whistleblowing Focal Points, Safeguarding Advisor and HQ Regional program teams.

What should be included in the message

When sending feedback or complaint to the Institutional level of CFRM, the following information should be included to help PIN understand and address concerns effectively:

- Contact details: of the person to whom the concern relates, or of the person reporting it on behalf of the concerned person or a concerned entity (such as community, organization etc.) These details are needed to provide a response. Information about the resolution of the complaint may be shared only with the person concerned, not with the person reporting it on behalf of a concerned individual. Anonymous reports are also accepted.
- Whether this is an appeal of a decision previously made regarding a complaint in the country where PIN operates. (This case should be marked by writing "Appeal" in the subject line of the email and Case ID provided, if available.)
- A clear description of the concern or feedback: what happened, where, and when.

- Who was involved: names or roles of people or organisations, if known.
- Any supporting information or evidence: such as documents, photos, or messages.
- Preferred outcome: what the complainant hopes will happen as a result of raising this concern.

The Institutional CFRM process

- **Submission:**
  - Relevant concerns, complaints, feedback, and appeals should be submitted directly to the Institutional CFRM
  - Appeals:
    - Appeals submitted through CP CFRM channels (in writing): CFRM officer locates the original case ID in the CP logbook, records it as an appeal in the Appeal field (including date and channel), and forwards the full case to the Institutional CFRM.
    - Appeals indicated verbally to CP staff: Staff inform the complainant about the availability of the Institutional CFRM and direct them to submit their appeal through that system. If the complainant faces any accessibility barriers (e.g., literacy, technology), the CFRM officer is contacted to support them in preparing and submitting their case to the Institutional CFRM.
- **Acknowledgment:** PIN IIL acknowledges the receipt of complaint, feedback or an appeal within 7 calendar days from accepting it either from CP or directly from a complainant.
- **Review and Investigation:**
  - IIL reviews the complaint and decides an appropriate procedure based on the severity of the complaint. It is logged either into the case register (orange and red severity categories) and investigated following the Investigation Guidelines. Investigation committee can be established in accordance with Investigation guidelines. For other categories, it is logged into a dedicated Institutional CFRM logbook and addressed. Complainant and relevant CP may be contacted for more information and provided a chance to be heard throughout the process.
- **Written decision:** A written decision or result, including the reasons for the outcome, will be provided within 30 calendar days of acknowledging, feedback, complaint or an appeal. This period can be extended by 30 days, but not more than twice.
- **Implementation:** Agreed-upon actions will be shared within PIN and implemented without delay as feasible for CP and/or PIN globally, as appropriate.
- **Finality:** While the process may lead to improvements in the organization's activities and approaches, the complaint or the appeal decision is considered final unless new information becomes available. Each complainant is informed in written decision about their right to seek legal redress.

Country Program CFRM

CP-based CFRM is established in each CP globally. This level is used as the primary mechanism to collect feedback and address complaints linked to PIN's operations and implementation of activities directly in each country where PIN works. It is managed by CP MEAL Unit and/or a dedicated CFRM Officer and follows CFRM policy that is adjusted to local context and CP resources.

Central reporting mechanisms should be established for the whole Country Program (e.g. central phone line for complaints from all targeted communities). **Each project should add**, according to its specifics, other reporting channels, in line with local customs and nature of the project. When possible, individual projects implemented in the same geographical area must **combine their mechanisms into one** (e.g. one suggestion box, one question desk). The priority is to ensure that

our reporting **mechanisms are understandable and accessible** to our target communities, while keeping the principles for designing and running accountability mechanisms described in this policy (below). To achieve this, it is important to ensure that:

- CFRM officer/focal points are aware of the new projects and their locations and are involved in the design of new reporting channels
- CFRM must be introduced to all projects staff (including newcomers)
- New CRFM channels must by consulted with target communities
- Reminders of available reporting channels should be shared with target communities on a regular basis

4 Standards

Who can make a complaint?
Any project participant, other member of the involved communities and other relevant stakeholders, local or national, as a group or an individual, can make a complaint using the Community Feedback and Response Mechanism.

What is covered by this policy?
Project related concerns about what we do and how we do our work. Feedback and complaints on the conduct and actions taken by PIN staff, its partners, contractors and suppliers in relation to PIN target communities (in particular, but not exclusively, PIN beneficiaries) and partners.

What is not covered by this policy?
Complaints from PIN staff are not covered by the CFRM; they are governed by PIN's procedures for dealing with problems in the workplace, i.e. Whistleblowing policy. Complaints relating to serious incidents such as fraud and corruption or safeguarding concerns will be dealt with through the relevant policy and procedures, i.e. *Anticorruption Policy, Safeguarding Policy* and *Prevention from Sexual Exploitation and Abuse Policy.*

How do we deal with complaints not concerning PIN?
PIN deals with complaints within its sphere of influence (i.e. action for which PIN is responsible). Complaints on actions reportedly done by other stakeholders should be handed over to responsible persons from the concerned office, if a referral system is in place. If a coordinated mechanism is not in place and PIN receives a serious complaint (e.g. SEA case), a senior staff member (e.g. CD or SG officer) should be consulted regarding further steps. *Note: the actions of entities which represent PIN in relationship with relevant communities (e.g. suppliers, contractors, interns, enumerators, volunteers, partner organizations etc.) fall under PIN's CFRM, thus PIN must deal with it*.

5 Terminology

- **Accountability** means that the organization is answerable for its actions and that there is redress when duties and commitments are not met, i.e. explaining what we have done and taking responsibility for the results of our actions. Handling feedback and complaints is an essential part of any organisation's commitment to being accountable to its stakeholders.

- **Feedback** is a comment or concern that can be positive or negative but does not always require a formal response. Feedback provides useful insights into how PIN projects are implemented. Feedback can be addressed informally during programme monitoring visits or can be referred to management staff if relevant/necessary.

- **A complaint** is an expression of dissatisfaction or unacceptability about the standards of service, actions or lack of action, by PIN or its staff and associated personnel[2]. It is a criticism that expects a reply and would like things to be changed.

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[2] I. e. contractors, suppliers, volunteers etc.

- **An Appeal** An appeal is a request made by a complainant to re-examine a decision or outcome of their submitted complaint when they are not satisfied with how it was resolved and closed. It gives the complainant the right to ask the organisation to review the case again, usually by a higher or independent authority within the mechanism.

6 Key principles for designing and running accountable feedback mechanisms[3]

Inspired by BOND's principles for building trust through feedback.

1. Context-specific and participatory

Any credible accountability mechanism must be appropriate to the local context, with consideration given to social, cultural and gender norms that may affect reporting. In particular, it is vital to select the channels and modalities for accepting and responding to feedback in consultation with the people who will use them. This will increase the community ownership of our feedback mechanisms, which is essential to ensure its practicality and use.

2. Inclusive and Accessible

We must allow the mechanism to be used by as many people as possible from as many groups as possible in places where the we operate. It must be safe, easy-to-use, respectful, and reachable for all concerned people, i.e. **regardless of gender, age, disability or any other dimension of diversity** that may temporarily or structurally diminish a person's ability to raise complaints and seek redress. It is important that we consider **how barriers to raising concerns can be overcome** - whether these are physical, cultural, rooted in fear, or a lack of awareness regarding the mechanism and the right to use it. The mechanism must include both collective (e.g. community meetings) and confidential channels (e.g. phone line).

3. Empowering

CFRM must be people-centred – or in the case of safeguarding concerns, survivor-centred (*please refer to* PIN Safeguarding Policy *for more details*). The accountability mechanism will be effective if we consider and (if possible) address the following power dynamics:

- The **power dynamics between PIN** on the one hand, **and a community** member on the other, and how this must be overcome if concerns are to be raised; and

- The **power dynamics within communities**, which prevent some people or groups from being able to raise their voice.

Establishing a people-centred feedback mechanism means **consulting a cross section of the community** during the design phase to understand the power dynamics.

4. Transparent

People from the affected community **must know that a CFRM exists** and have sufficient information on **how to access** it. The people whom it concerns should be able to speak to PIN staff regularly about the operation of the complaint mechanism and **know who at PIN is responsible** for handling complaints and communicating outcomes.

Additionally, people should be informed about their options if they are not satisfied with the decision or outcome of their complaint. This includes **informing of the appeal process within Institutional CFRM and ensuring they understand their right to seek legal redress**.

5. Collective responsibility

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[3] Inspired by BOND's Principles for building trust through feedback

Communities affected by poverty, marginalisation or disasters are often unable to distinguish between the different actors who aim to support them, nor should they be expected to. The systems for feedback and accountability need to consider this. Therefore, we should to coordinate (as much as possible) with other relevant actors and try to **go beyond the individual brands and realize that our position of power makes us able to share responsibility to create a safe, considerate and empowering environment for our interventions collectively.** *Please refer also to* dealing with complaints not concerning PIN**.**

6. Impartial and Confidential

An accountability and feedback system will be credible and sustainable once there is assurance that the issues raised are looked into thoroughly and with impartiality. This requires us to explore the systems of power and incentives that affect our staff (identify and address issues regarding conflicts of interest) to enable them to form judgments that are as unbiased as possible.

To ensure confidentiality, we must **restrict access to, and dissemination of, information connected with the complaint**. This requires information to be available only to a limited number of authorized people (generally the Senior Management of the organisation) for performing the necessary steps resulting from the complaint (e.g. investigation).

7. Do No Harm

It is of paramount importance that our mechanisms for receiving feedback – just like our actual interventions – do not negatively affect the people intended to receive support. This is relevant to various elements of a feedback mechanism - reporting channels must be designed without presenting any immediate risk to vulnerable people reporting concern. Once feedback has been given, it is then critical to handle it in a way that does no harm, i.e. not exposing survivors to stigma, retribution and/or retaliation.

8. Handled Swiftly

We must handle all complaints swiftly. Concrete classification of timely action depends upon the nature and complexity of the matter, and local conditions. CPs should consider this when defining their country-specific rules, paying specific attention to safeguarding cases, particularly those involving sexual exploitation and abuse (*please refer to the* PIN Prevention of Sexual Exploitation and Abuse Policy *for more details*).

9. Consistently closing the loop

By closing the feedback loop, we mean that action, i.e. any measures taken as a result of the feedback being raised, is communicated back to those who shared the complaint in the first instance (unless it was anonymous). Providing fair and consistent communication will help strengthen the credibility of our procedures.

10. Appropriately resourced

All of the points above have resourcing implications. We need to allocate sufficient resources to meet all of the outlined principles. This includes resources in terms of physical infrastructure (such as telephones for a hotline or a computer to access a database) as well as investment in staff training and awareness-raising in communities. The level of resourcing necessary will depend on the circumstances. Some country programs may choose to set aside a portion of a project budget specifically for feedback and accountability mechanisms, while others may opt for a variation on this in other interventions.

7 Follow these 10 steps in order to successfully establish and implement an effective CFRM procedure

1. COMMIT to the process of setting up and maintaining an effective CFRM

Appropriate resources (including those HR-related) need to be devoted to this purpose. **Senior management** should demonstrate its commitment and ensure that the **responsible staff** (with the required time capacity, qualifications and experiences) and other needed **resources** (e.g. funds, physical infrastructure) are allocated.

Create commitment **across the whole country program** by discussing the CFRM, providing training, and facilitating discussion about potential risks.

Continuously work on **organizational culture**: use opportunities (e.g. a country program meeting) to foster an open-minded organizational culture that is self-critical and open to feedback and improvement.

Engage **partner organizations**: make sure PIN partner organizations understand and are fully committed to the principles stated in this policy.

2. CONSULT beneficiaries, host communities and other stakeholders about appropriate ways to share feedback.

Allow 'end-users' to decide what is best, i.e. which communication tools and channels are most appropriate for use in the feedback mechanism.

Know the context you work in - have an awareness discussion with PIN staff; enable them to share their ideas. **Identify barriers**: Consider allowing anonymous complaints. Address barriers due to gender/ethnicity/religion/language. Offer complaint protection.

Collect the **best practices and lessons learned**, and discuss it with partner organizations and other concerned stakeholders.

3. CREATE guidelines and other instructional materials that describe CFRM procedures in your country program (project).

Prepare guidelines that are consistent with this policy and will further describe **country-specific** CFRM **procedures**, i.e. clearly specifying preparatory and implementation steps for collecting and responding to complaints and related obligations of PIN staff.

Prepare other **instructional and awareness raising materials** to present the use of communication tools and channels in a way that is **appropriate for their final users** (e.g. local language, pictorial materials for people with low literacy, for children etc.).

Include information about Institutional CFRM, Appeal procedure and the right to seek Legal redress into the appropriate communication tools.

- Information about Institutional CFRM needs to be included, as minimum, at the Global PIN and CP CFRM websites.

- The following clause on Legal redress should be included in various communication tools and translated to local languages, as appropriate.

'PIN recognises and respects the right of all complainants to seek legal redress. The organization will not interfere with, obstruct, or discourage access to legal or judicial processes. Our internal complaint mechanisms are designed to complement – not replace – external legal actions.'

4. TRAIN AND RAISE AWARENESS

Train staff (including partners when applicable) in the country-specific CFRM processes and procedure.

Raise awareness among beneficiaries, host communities and other stakeholders to ensure that they (1) **know what behaviour of PIN staff and partners (including suppliers) we consider acceptable, and what to report, and (2) understand how to share the report** (send feedback or make a complaint).

Always communicate clearly the existence of the CFRM, its purpose and its functioning, both internally (e.g. through regular staff trainings, website, posters, flyers, appraisal meetings) and externally (e.g. public meetings, presentations, newspaper, radio etc.)

5. RECEIVE AND RECORD

Regularly check channels for receiving feedback and record them into the system used by the CP (e.g. logbook – *see the annex* **template for CFRM logbook**). If possible, acknowledge received feedback. Disaggregate recorded data by age, gender and other relevant categories. Apply the principle of confidentiality when receiving and handling complaints.

6. CATEGORIZE (and when needed) VERIFY

We categorize complaints in order to **distinguish regular feedback, moderate grievances and major grievances** - *see the annex categorization of complaints*. When unsure, conduct a quick verification of the complaint first. Using the severity categorization (green through red categories) and the E&S categorization is mandatory. Report a Major Grievance via **PIN's Case Register.**

7. RESOLVE COMPLAINT, If relevant, INVESTIGATE

Resolve complaint (a) informally, using program knowledge and common sense, or (2) formally, by investigation. Complaints that require investigation should be handled in accordance to the **PIN Investigation Guidelines.**

It is mandatory to **report all abuses of children that you were made aware of**. If a complaint is about child abuse by a staff member or representative, or about staff member of another NGO, immediately inform the Country Director or another senior manager. Do not try to investigate the case yourself and don't discuss it with others. Simply report it. If a complaint is about serious child abuse by a community member, consult your safeguarding officer/HQ PSEA focal point or local procedures so the case can be referred to relevant authorities.

8. RESPOND and check acceptance

Complaints require a response. When possible, provide a response to the complainant based on the results from internal investigations (in agreement with the investigation committee). Always record response. Check whether the complainant/victim accepts the response, if applicable. In case they do not, the supervisor of the persons that dealt with the complaint should be informed. At this step, the information about the appeal procedure and their right to seek legal redress should be shared.

9. ANALYSE COMPLAINTS and REPORT LESSONS LEARNED

To realize the potential of the complaint mechanism as a tool for learning and improvement, it is essential to analyse the cases we deal with. For example, ask, *What were the origins of the complaint? Was it handled well? How can similar cases be avoided in the future?* Knowledge can be gained from each complaint to improve the organization's operations. The more cases detected, the more systematic approaches can be developed.

Lessons learned can feed continuously into project improvement. With this purpose in mind, all complaints received – whether they lead to an investigation or not – should be kept on record in written form. This way, complaints can be analysed systematically and used for institutional improvement by detecting structural malfunctions

10. REVIEW the process

Conduct a review of CFRM procedures at least annually, in order to address new needs and incorporate lessons learned into the process systematically.

8 Communication tools

Successful community feedback mechanisms usually rely on a mix of communication tools ranging from in-person visits to more technological, digital, or SMS-based systems. Ideally, you will build the feedback mechanism around the tools that are commonly used, preferred, and well-understood in a given context by the people expected to give feedback. Below are some examples of these tools/channels.

TOOLS THAT ARE PART OF PROGRAM DELIVERY:

- Community or village-level **meetings** before or after aid distribution
- In-person **visits** at the level of households as part of field monitoring
- In-person visits and **focus group discussions** as part of assessment

It is important to consider that people, especially community members, may not be comfortable complaining directly to the staff they work with every day, and it **might be more suitable** for them to **complain to someone more removed or senior** within the programme / organisation.

OTHER TOOLS AND CHANNELS ESTABLISHED SPECIFICALLY TO SUPPORT A FEEDBACK MECHANISM

- Comment and suggestion **boxes**
- Encouraging written **letters mailed directly** to a PIN office
- Encouraging **in-person visits to a PIN office**, e.g. during designated drop-in hours
- **Radio programme** with call-in service
- Provision of **toll-free mobile** phone lines
- Integrated **voice response technology** applied to mass SMS messaging
- **Feedback postcards** - Self-addressed, stamped envelope with postcards inviting feedback can be given to those assisted by the programme. Specific questions can be asked about the quality of, or satisfaction with, the programme, and people can be asked to complete it and send it back via post, give it to staff, or deliver it to the office.
- **Question desk –** A desk or designated place 'manned' at set times by a staff member or volunteer, allowing community members to approach them with programme queries, feedback and complaints as needed. These will be recorded in a log book. The desk can be in the community on certain days, or at an office or health centre. It is best when located nearby to where programme activities are happening.

- **Information cards with key points and directions on how to access the appeal process.** These can either be handed out to persons or entities who express their intent to submit and appeal or used by staff as guiding set of talking points to use in response to an appeal submission request.

BENEFICIARY REPRESENTATIVE(S)

Having a beneficiary or stakeholder representative(s) involved in the complaints process can be a positive and transparent addition, but it is important that everyone involved understands the authority and knowledge they hold (who do they represent?) within a community, and how this contributes to the process and finding a solution.

Beneficiary representative can for instance be community committee, made up of diverse representatives of the whole community, designated to record complaints and feedback in their area. The committee and community need to be briefed on the committee's role, and a log book should be supplied for recording all complaints and feedback. Regular meeting times should be agreed upon for staff and the committee to review the log book together, and decide on the action needed.

9 Roles and responsibilities

The roles and responsibilities of different people involved in the CFRM need to be carefully defined and communicated.

- **Senior management / Country Director** – It is the responsibility of the management to ensure that procedures resulting from this policy are set in accordance with the principles outlined. Senior managers should promote the CFRM mechanism and show ownership of the principles stated in this policy. The CD has the ultimate responsibility for the proper functionality of the CFRM in a given CP. To avoid overloading the CD, their direct operational role should be limited. If the complaint is concerning them, then there may be a need to consider supervisory parties (e.g. Regional director) as another authority to whom to lodge the complaint.

- **Investigations and Integrity Lead (IIL)** – The IIL is the main focal point at the Institutional CFRM level. The role is included in the whistleblowing email, the main contact for Institutional CFRM, and ensures that all received feedback and concerns are properly sorted, categorized and logged following either whistleblowing or CFRM procedures, including the appeals or previously submitted complaints.

- **Immediate manager to the subject of complaint** – for complaints concerning staff, their immediate manager will usually be involved in the process. For sensitive issues, it might be necessary to involve senior management, HR or a safeguarding officer.

- **CFRM officer** – a person designated to receive, record and forward or handle (and potentially also co-investigate) received feedback and complaints. A CFRM officer can be a role, i.e. not a full-time employee, rather a responsibility assigned to a person already working for PIN, depending on the size and type of the intervention. It is recommended to have the position of CFRM officer positioned within the MEAL unit in the CP's structure (e.g. CFRM officer = MEAL officer).

- **Programme / Field staff** – the staff closest to the situation can handle most of the feedback. However, if the feedback is about them directly, support from more senior or specifically designated staff is required.

- **Donor or other partner NGO** – PIN must observe its contractual obligations towards donor(s), especially with regards to reporting safeguarding issues. Consult HQ compliance for more info if needed.

ANNEXES
- Categorization of Complaints
- Logbook template