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SOP for Feedback and Reporting Mechanism

Date of last Revision: March 2023

SUMMARY OF SECTIONS

1   POLICY PURPOSE

The purpose of this policy is to give guidance and a framework for the reporting, collection, and documentation of all kinds of complaints, whether received from service users, employees, consultant staff, or interns or volunteers or other partners or stakeholders. This policy aims to promote accountability and empower communities, affected populations and employees to report abuse, corruption, misuse of power or misappropriation of funds, and to access protection needed. It is a tool to allow those who experience or witness misconduct to voice their concerns and to allow the organization to enhance its detection of misconduct and enhance operations to fulfill its mission and social impact.
It aims to ensure that feedback, complaints, or grievances are raised effectively and at the earliest possible stage, are documented and addressed timeously and fairly by adopting and implementing safe, accessible, clear and confidential channels for reporting.

2   SCOPE

This policy applies to all Embrace service users, full time and part time employees, consultants, volunteers, and interns and relates to issues or incidents that have occurred in work or in work related issues.

Feedback and complaints can be raised by any of the above listed stakeholders.

The following policy does not apply to:
- Feedback or complaints regarding employment contracts or terms, and such feedback should be raised to HR directly and is covered in Embrace's HR handbook
- Feedback which if offensive or abusive in nature and which is motivated by religious, political or racist viewpoints.

3   DEFINITIONS

Feedback   Is any positive or negative informal statement or opinion about something or someone not with the intention of raising a formal complaint. Feedback does not necessitate a response.

Complaint   A type of feedback that necessitates a response and is considered a formal expression of dissatisfaction or a reporting of misconduct that took place towards something or someone.
Examples of complaints include:
*Breaches of the organizations Code of Conduct (These are referred to as **serious or critical complaints** and can be related to corruption, fraud, nepotism, misuse of funds or property, physical or psychological or sexual abuse, retaliation, procurement fraud, threat, physical safety risks)*
*Poor quality of services delivered by a program (referred to as Operational or **Programmatic Complaints** and can include complaints about the quality of the service, staff attitude, exclusion of a minority group, inability to reach feedback hotline, extortion of aid, discrimination against service user)*

Service User   A person who is receiving a service or intends to receive a service or assistance being provided by Embrace.

Feedback and Reporting Mechanism   A mechanism that allows for the promotion and achievement of accountability through providing a transparent, safe, and confidential framework and guidance for clients and employees to be voice their concerns and report abuse, fraud, or misuse of power.

Accountability   To acknowledge and assume responsibility for all actions and decisions undertaken within the organization.

Transparency   To engage in open and honest communication and to share relevant information with concerned parties, whether service users, clients, employees, or public stakeholders.

Proactive Feedback Channels   Are mechanisms through Embrace actively seeks feedback from its clients, service users, and employees. This is done through periodic surveys and focus group discussions and annual or bi-annual employee feedback talks.

Reactive Feedback Channels   Are channels that Embrace provides to its clients, service users, and employees to provide feedback at their own time and when concerns arise, and this includes hotlines suggestion boxes, email-addresses, or in person walk-ins.

Open Feedback Channels   Open feedback channels are available to staff and service users through daily routines interactions and meetings.

Indirect Feedback Channels   Refers to information that Embrace collects or feedback collected or received from other organizations.

4   GENERAL PRINCIPLES

4.1   AWARENESS OF FEEDBACK CHANNELS

All Embrace service users, full time and part time employees, consultants, volunteers, and interns shall be informed about the available channels for feedback and reporting of complaints. To ensure stakeholders are informed of these channels a list of actions described below shall be implemented:

- Installation of reader friendly posters at Embrace's locations
- Sharing of feedback and reporting mechanism policy via email to all staff
- Sharing of feedback and reporting mechanism channels to service users via email or WhatsApp
- Induction and presentation of feedback and reporting mechanism policy to new employees, consultants, interns, and volunteers as part of their HR induction upon joining organization
- Posting of the feedback and reporting mechanism policy on Embrace's website

4.2   ANONYMITY AND CONFIDENTIALITY OF REPORTING

Clients or other stakeholders who are voicing their concerns through the feedback and reporting mechanism may wish to do so anonymously, without disclosing their identity. While Embrace respects their wish to remain anonymous, this can deter Embrace from providing a follow up to the client or stakeholder regarding their complaint. Embrace encourages individuals who wish to remain anonymous to identify a proxy individual who can be contacted to follow up on the complaint received. When submitting a complaint, client is encouraged to provide their contact information which will help Embrace to follow up and communicate directly with the client. In the case of reporting of sensitive information, disclosing of complainant's identity may be required by the law to fully investigate the complaint/feedback received, and complainant's identity shall be governed by strict confidentiality obligations.

To ensure the safeguarding of confidentiality, a restricted number of authorized staff only, necessary for conducting of the investigation, shall have access to the complaint/feedback report and any breach in confidentiality shall lead to disciplinary action.

All complaints shall be documented and processed in confidential, and password protected database. Sensitive complaints shall be documented in a separate database than from the general feedback registry.

Information regarding the complaint shall not be disclosed except to the client themselves or their proxy.

4.3   NON-RETALIATION

Embrace prohibits retaliation by its employees or staff against any individual who reports a feedback or complaint and disciplinary action leading to termination will be taken against any member of the organization who is reported or found or witnessed to have engaged in retaliatory actions against a complainant.

5   PROCEDURES FOR RECEIVING FEEDBACK AND COMPLAINTS

The below procedures describe the type of feedback and the referral mechanism for handing the feedback or complaint based on the nature of the complaint, and identifies its priority level as either low, medium, high or critical.

5.1   PRIORITY LEVELS

- **Low priority** feedback is not time bound and can be handled either on the spot or within 1 working day.
- **Medium priority** feedback shall be handled within 5 days
- **High & Critical priority** feedback shall be handled within 2 days, up to 15 days if investigation is needed

5.2   REFERRAL PATHWAYS

	Category	Priority Level	Description	Documentation	Referral
1	**Programmatic Complaint**	**Medium**	Complaint about missing or delayed aid entitlement or timing of aid, quality of aid	Complaint is recorded in secure database by the Integrity Officer	Complaint referred to the relevant program focal point (usually program manager)
2	**Programmatic Complaint**	**High**	Include complaints about staff attitude, exclusion of a minority group, inability to reach feedback hotline, extortion of aid, discrimination against service user	Complaint is recorded in secure database by the Integrity Officer	Complaint referred to the relevant program focal point (usually program manager)
3	**Serious, critical complaints – related to breach of Code of Conduct**	**Critical**	Related to corruption, fraud, nepotism, misuse of funds or property, physical or psychological or sexual abuse, retaliation, procurement fraud, threat, physical safety risks)	Complaint is recorded in a secure separate database	Complaint is referred to either program manager or HR or managing director or executive board depending on nature of the complaint.

4	Non-programmatic Complaint against non-Embrace staff	Critical	Related to allegations of abuse or sexual exploitation committed by someone who is not an Embrace staff	Complaint is recorded in a secure separate database	Complaint is referred to National agencies for child protection in case of child abuse allegation (See Child Protection Policy) and/or director of other organization.

5.3. FEEDBACK MECHANISM FLOW CHART

Complaint is received through one of many channels (text message, email, WhatsApp, in person) → Complaint is registered by Integrity Officer → Complaint is referred to relevant focal point acorrding to referral pathway → Complainant is informed about the response/decision regarding their complaint → Case is closed and action plan documented in registry

6   ROLES AND RESPONSIBILITES

Complainant	• Responsible to clearly describe their complaint and provide all relevant details where possible
Integrity Officer	• Monitors feedback and ensures it is received and being collected from different channels in a timely manner • Ensures policies and procedures are implemented to prevent and detect ethical violations • Ensures people are informed of their right to submit feedback by conducting regular awareness activities • Documents complaints received in the relevant databases • Refers and escalates complaints to relevant focal points, program managers and senior management as needed • Trains employees, staff and volunteers on protection policies including Child Protection and PSEA Policies • Conducts trainings and awareness sessions on Feedback Reporting Mechanism
Line Manager/Program Manager	• Responsible for dealing promptly, fairly, and consistently in accordance with relevant policy and procedure and responsible and for seeking advice from HR Support. • Responsible for responding to clients (service users, employees) with the action points that were implemented in response to their feedback or complaint.
HR Manager	• Handles complaints relevant to staff violations or breach of code of conduct • Conducts trainings and awareness sessions on Feedback Reporting Mechanism • Takes part of the Complaint Review Committee (CRC) and engages in tasks and responsibilities of the CRC
Managing Director	• Ensures policies and procedures are implemented to prevent and detect ethical violations. • Fosters a client-responsive culture within the organization and encourages staff to collect and refer feedback and complaints including negative or sensitive ones • Plays a critical role and takes part in the CRC

	• Ensures documentation of all complaints in the database
Complaint Review Committee	• Ensures policies and procedures are implemented to prevent and detect ethical violations • Conducts fact finding investigation in critical complaints and arranges meetings with relevant parties to collect and document the needed facts. • Consults with external technical experts when needed. • Produces report to document action plan and procedures that took place in response to the complaint. • Responsible for responding to clients (service users, employees) with the action points that were implemented in response to their feedback or complaint.

7   RESPONDING TO FEEDBACK AND COMPLAINTS

7.1. GENERAL GUIDELINES

• Client feedback should be interpreted with caution, and once a feedback or complaint is received, it is important that the focal point investigates whether this is a recurrent feedback or complaint, whether is it being voiced by multiple persons, and if it is being reported for the first time.

• Responding to client feedback entails collecting information from several sources to understand and better assess data from the feedback.

• Depending on the concerns/feedback or complaints raise, the process of responding to feedback should entail the outlining of one or preferably more course of action that can be taken to address the feedback. These courses of action should be feasible to implement and aligned with the organization's mission and human, financial and technical capacities. Consultations with a group of clients can be conducted to help the organization reach a final decision regarding a course of action.

7.2. COMMUNICATION PROCESS

• Response to feedback shall follow the timeframe described above and focal points involved shall strive to ensure that feedback is responded to in a timely manner, and courses of action are also implemented in a timely manner.

• Responses to feedback may vary according to the nature of the feedback/complaint.

• Responses to feedback are provided back to the client based on the preferred channel they selected when they submitted their feedback/complaint, and can take place through hotline, email, or face to face meetings.

• In sensitive cases and when responding back to feedback, focal points shall always ensure the safety of the complainant/client and shall ensure there is no potential risk involved for the client.

7.3. MONITORING & EVALUATION

• Integrity officer shall be responsible for the monitoring and evaluation of client feedback and responsiveness and the following indicators shall be considered in periodic summaries of monitoring and evaluation reports
  o Timeframe during which feedback and complaints are responded to

- o % of clients and employees who are aware of existing feedback and complaints mechanisms
- o % of clients satisfied with the quality services being provided

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Appendix 1. Feedback and Complaints Form

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Feedback and Complaints Form

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This complaint form can be submitted via email to the following email address integrity@embracelebanon.org or it can be placed in the complaint box available on Embrace office premises or submitted in hand to the Integrity Officer at Embrace.

Section I- Personal Information

Name:

Contact Number:

Email:

Date:

Section II- Feedback or Complaint
Please provide a <u>concise</u> description of your complaints and be as <u>specific</u> as possible
Briefly describe your feedback/complaint. What are the main issues?   When did the incident/issue causing you concern first occur?   If a series of events, please provide dates.
If the incident/issue occurred more than 3 months ago, what are the reasons for not raising it before?

Have you tried to resolve the matter informally?
 	
 ☐ Yes ☐ No
 	
 <u>If yes</u>
 	
     • What was the outcome?
     • Why did it not resolve the matter for you?
 	
 <u>If No</u>
 	
     • Briefly explain why you have not tried to resolve the matter on an informal basis?

Where there witnesses to the incident/issue? ☐ Yes ☐ No   If yes, provide names of witnesses:
Section III- Proposed Solution

Briefly describe how would you see or recommend your feedback or complaint be addressed or resolved?
Section IV- Response to Feedback How would you like us to reconnect with you to respond to your feedback/complaints? ☐ I don't require a response but I wanted to voice my concern ☐ Phone ☐ Email ☐ In person ☐ Through a proxy, please mention the name and contact number of the proxy individual: _____

I confirm that the information I have provided is true and accurate.

_____ _____

Signature   Date