

Standards for

Complaints Reporting

**by Beneficiaries, Partners and
other External Stakeholders**

March 2020



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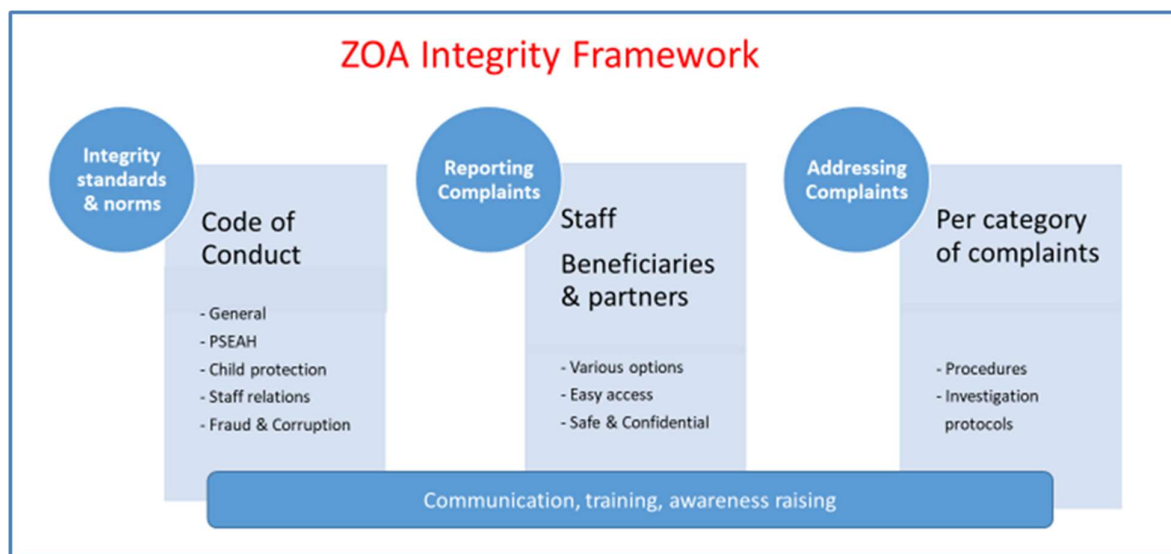
1 INTRODUCTION

1.1 PLACE AND BACKGROUND OF THIS DOCUMENT

As an international organisation providing relief and recovery support to people affected by conflicts and disasters, ZOA is committed to maintaining the highest standards of integrity in all its activities. For that purpose, the ZOA Integrity Framework was developed, comprising three main pillars:

- The ZOA Code of Conduct (i.e. this document) outlines the standard of behaviour ZOA seeks to promote within the organisation and in the interaction with its stakeholders.
- Procedures for staff, beneficiaries¹ and other key stakeholders on how to report a grievance or complaint with reference to the ZOA Code of Conduct or in connection with any other aspect of our work.
- Procedures for addressing complaints received.

The structure of the Integrity Framework is illustrated in the figure below.



All ZOA staff are trained on the content and application of the Integrity Framework, through mandatory training sessions.

This document describes part of the second pillar of the Integrity Framework: standards for guiding beneficiaries, partner organisations and other external stakeholders in the way they can report a complaint. In a separate document, similar procedures are described for ZOA staff who want to report grievances.

Procedures for handling different categories of complaints and grievances received are described separately under the third pillar.

¹ The people served by ZOA through its projects and programmes are referred to in this document as 'beneficiaries'. Although the term 'beneficiaries' does not adequately reflect the rights and position of these people, it is used in this document for practical reasons of readability.

1.2 PURPOSE

For several reasons, a well-functioning complaints mechanism is important:

- For beneficiaries and partners, it is a way of practicing their rights to be actively involved in all stages of project management and to express their opinions and concerns.
- For ZOA, it is an important mechanism for learning and improvement, based on the opinion that quality management and improvement requires regular input and transparent feedback from those that are among ZOA's 'primary clients'.
- It contributes to the protection of beneficiaries and partners against any ZOA related practices that may be (potentially) harmful and do not serve their interest.
- In more general terms, it contributes to a climate of trust, transparency, accountability and confidence between ZOA and its stakeholders.

1.3 HOW TO READ THIS DOCUMENT

In the next chapters of this document, the scope (chapter 2) and underlying key principles (chapter 3) are first described. In chapter 4, the different routes that can be used for reporting complaints are described as well as the related arrangements for registration.

In this document general standards for complaints reporting are provided that apply to the whole organisation. These general standards are the absolute minimum that has to be in place in each country. However, based on consultation with beneficiaries, additional ways of reporting could be established, for example a complaints box. Chapter 5 provides guidelines on how to develop the country specific application.

2 SCOPE

2.1 USERS OF THE COMPLAINTS REPORTING MECHANISM

The complaints reporting mechanisms are intended to be used by external stakeholders of ZOA:

- people served through ZOA's projects and programmes (beneficiaries);
- partner organisations and their staff (humanitarian partners, contractors and authorities);
- persons (non-beneficiaries) or third parties involved in or affected by policies and activities of ZOA and its staff;

A person reporting a complaint is not necessarily the person affected by the concern raised in the complaint, but can also be a person who wants to bring the matter to ZOA's attention.

2.2 THE NATURE OF COMPLAINTS

A complaint is an expression of protest communicated by anybody who feels negatively affected by ZOA or who believes that ZOA has failed to meet a stated commitment. Complaints can, for instance, be related to issues concerning the ZOA Code of Conduct, to ZOA's performance during design or implementation of projects. Complaints are about issues that could not be settled in the 'day to day' interaction with ZOA staff. All complaints are registered and require formal response by ZOA.

Although a hard distinction cannot always be made, complaints differ from general feedback. Feedback refers to any positive information or criticism provided by a stakeholder, unsolicited or requested by ZOA, often not related to issues concerning the ZOA Code of Conduct. Feedback is usually communicated and solved (as far as solving the matter is needed) in the common, 'day to day' communication with ZOA staff. Besides, it is important to register feedback in the (Country/Project) Logbook on ZOA Manager and learn from it. Although important, general feedback is outside the scope of complaints handling.

ZOA staff should be alert in distinguishing complaints from general feedback, especially when it is communicated verbally. By all means, downscaling to feedback what was intended to be a complaint, must be prevented. In the end, it remains for a beneficiary or partner to decide when to file a formal complaint.

Complaints can have an operational nature, related to - for instance - project activities or the quality or quantity of assistance provided. Complaints can also have an interpersonal nature, related to personal behaviour of staff, consultants, volunteers or others working on behalf of ZOA, like physical, psychological or sexual abuse or harassment. Other complaints have a material nature, related to the misuse of assets and resources for personal gain, like fraud, corruption and theft. Although most complaints are in these categories, they can also have any other nature.

2.3 REFERRAL TO OTHER PARTIES

ZOA can only deal with complaints that are related to issues for which it is responsible or which it can influence. In case complaints refer to issues that are outside ZOA's scope of responsibility or influence, ZOA can refer the complaint to relevant other parties (e.g. partner organisations, government authorities), as much as possible in consultation with the complainant.

3 PRINCIPLES

The following general principles apply for the development and application of complaint reporting mechanisms in ZOA:

- **Easy access:** Reporting a complaint should be simple and straightforward.
 - Persons who wish to file a complaint with ZOA don't need to worry about which route to follow for communicating their complaint. They will be offered different options for communicating their complaint, from which they will choose the option that best fits their situation.
 - Irrespective of the nature of the complaint and the way it was communicated, ZOA staff will ensure that a complaint will end up where it should for appropriate follow-up.
- **Context specific:** The different options offered for communicating complaints should be appropriate in the local context.
 - Beneficiary representatives will be actively consulted in the process of developing appropriate options for communicating complaints in a specific local context.
 - Based on the input received from beneficiaries, specific options for communication complaints will be developed per country, in addition to the generic, ZOA-wide options for communicating complaints.
- **Confidential:** Complaints will be treated with an appropriate level of confidentiality and discretion.
 - Complaints will be registered in a protected environment, with limited access by relevant staff.
 - All staff involved in addressing a complaint are required to maintain confidentiality.
 - In the various options that are offered for communicating complaints, different ways and levels of safeguarding confidentiality and discretion will be realised. These will be explained to beneficiaries and partners, so that they can choose the option that they consider most appropriate for their situation.
- **Non-retaliation:** Complainants reporting in good faith will not be disadvantaged in any way.
 - ZOA will do everything possible to protect complainants against any form of retaliation or other (potential) negative impact to the complainant.
- **Addressed as local as possible:** Complaints will be addressed as local (i.e. close to the issue reported) as possible and appropriate, but will involve attention at central organization level where needed.
 - In deciding at what organisation level a complaint should be addressed, a balance will always be sought between understanding local context and dynamics as well as safeguarding objectivity and transparency.
 - Sensitive complaints will require monitoring and involvement at headquarters level in order to ensure appropriate follow up.
- **Committed response:** ZOA takes all complaints serious and will respond in a fair and structured manner.
 - All complaints will be dealt with consistently, fairly, and with integrity.
 - Complaints will be addressed in accordance with standardized procedures (as described under pillar 3 of the Integrity Framework).
 - Complainants will be offered the option for appealing against an original decision about a complaint. That will be limited to one appeal.
- **Timeliness:** Complaints are expected within reasonable time and are responded to promptly
 - Complainants are notified (in writing or verbally, depending on the situation) within 5 working days about the proper receipt of a complaint.
 - In the event more time is needed for investigating the complaint than what was originally communicated, the complainant is informed adequately.
 - Complaints should be made within 3 months after the event or incident it refers to. In exceptional circumstances ZOA will respond to a complaint that concerns incidents that are longer ago.
- **Mutual respect:** Everyone who reports a complaint to ZOA will be treated respectfully; ZOA expects people reporting a complaint to do so fairly and respectfully.
 - If complainants behave abusively or unreasonably in pursuing their complaints, ZOA reserves the right to withdraw or modify its complaints handling process.

4 REPORTING COMPLAINTS

4.1 OPTIONS FOR REPORTING COMPLAINTS AT COUNTRY AND GLOBAL LEVEL

ZOA offers beneficiaries, partner organisation staff or other stakeholders various ways to report a complaint, at different levels in ZOA as well as independent of ZOA. Beneficiaries, partner organisation staff or other stakeholders can decide which way is most suitable to them, given their situation and the nature of the complaint.

The following generic options for reporting a complaint are available in all ZOA countries:

- Complaints can be reported verbally or in writing to any ZOA staff member. ZOA staff is trained in receiving and recording complaints from beneficiaries, partner organisation staff or other external stakeholders. After receiving the complaint, the staff member must record it in a standard complaints form (see annex 2). The completed form is sent to the Country Integrity Coordinator, who registers it and, upon decision by the CD, approaches relevant staff for handling the complaint.
- Complaints can be sent to a country specific email address for complaints: report.<country>@zoa.ngo (Address to be made country specific). This mailbox is managed by the Country Integrity Coordinator, who registers complaints received and, upon decision by the CD, approaches relevant staff for handling the complaint.
- Complaints can be reported through a country specific telephone number. (Telephone number to be determined per country. Preferably, the number can be used toll-free and/ or have a WhatsApp modality.)
The telephone number is managed by the Country Integrity Coordinator, who records the complaint in a standard complaints form, registers it and, upon decision by the CD, approaches relevant staff for handling the complaint.
- In addition to the option of reporting verbally to any ZOA country staff member, other country specific ways of communicating complaints must be determined, in consultation with beneficiaries and local partners. (See chapter 5 and annexes for more details.)

The following options for reporting a complaint are available at the level of ZOA HQ in the Netherlands:

- Complaints can be sent to the ZOA global email address for complaints: report@zoa.ngo. The mailbox is managed by the ZOA HQ Integrity Coordinator, who registers complaints received and, upon decision by the Board, approaches relevant staff for handling the complaint.
- Complaints can be reported during working hours in the Netherlands (Mondays – Fridays; 09:00 – 17:00 hrs, Central European Time) through a global telephone number: +31 6 8128 9087. This number can also be used for WhatsApp messages.
The telephone number is managed by the ZOA HQ Integrity Coordinator, who records the complaint in a standard complaints form, registers it and, upon decision by the Board, approaches relevant staff for handling the complaint.

In case a person concludes none of the above options is appropriate for reporting a complaint in a specific situation or is uncertain about that, and wants to report or get advice independent of ZOA line management, an alternative option is available for confidential contact with an independent external agency:

- The Dutch Whistleblowers Authority can be contacted through e-mail: advies@huisvoorklokkenluiders.nl or telephone: +31 88 3713031.
They will follow their own procedures in deciding how to give follow-up to the complaint.

4.2 REGISTRATION AND NOTIFICATION

All complaints received must be recorded in a standardised complaints form (see sample format in annex 2), without changes made to the original content of the complaint. The completed complaints forms are kept by the Country Integrity Coordinator or ZOA HQ Integrity Coordinator.

In case of verbal complaints, ZOA staff should carefully listen to what the complainant exactly wants to communicate and invite the complainant to clarify this where needed. If necessary, a translator is involved, preferably an independent person without any interest in the complaint. Once the complaint is clearly understood, ZOA staff makes a concise but accurate summary, which is recorded in a complaints form.

Complainants are notified (in writing or verbally, depending on the situation) within 5 working days about the proper receipt of a complaint and about the expected timeframe for responding to the complaint.

The Country Integrity Coordinators and ZOA HQ Integrity Coordinator maintain a register of all complaints received, as well as their status. Given the confidential nature of most complaints, these registers must be protected with passwords or other forms of access management.

4.3 HANDLING OF COMPLAINTS RECEIVED

As the nature of complaints differs, different procedures have been defined for appropriate handling of complaints received. These have been described in a separate document under pillar 3 of the ZOA Integrity Framework. The specific nature of the respective follow-up procedure and corresponding timeframe should be taken into account while informing a complainant about the receipt of the complaint and the anticipated follow-up process.

5 PROCESS GUIDELINES FOR COUNTRY-SPECIFIC PROCEDURES

As mentioned in the previous chapters, country specific mechanisms for receiving and dealing with complaints must be available in all ZOA country programmes. These include the generic options for reporting complaints outlined in section 4.1, as well as country specific details and additional options where relevant. Guidelines for the process of developing and maintaining these country specific mechanisms are provided in this chapter.

5.1 KEY ELEMENTS

The following key elements should be in place for creating and maintaining a well-functioning mechanism for complaints reporting:

- **Consultation** - Beneficiaries, local partners and other external stakeholders must be consulted about their preferred way of sharing feedback and complaints with ZOA. (See section 4.1 above.)
- **Multiple ways for reporting complaints** - Communities should be offered different ways to report complaints. See section 4.1. Where relevant, these are contextualised and made country specific.
- **Training** – ZOA staff must be trained about the ZOA Integrity Framework, the country specific complaints handling procedures and about the effective communication thereof. Refresher trainings should be conducted at least annually.
- **Communication** – Beneficiaries and partners should be informed timely, regularly and in an appropriate way about the complaints mechanism and about what they can expect from ZOA. In such communication specific attention must be given to:
 - the fact that beneficiaries and partners are welcome to communicate complaints to ZOA;
 - the different ways they can use for reporting complaints and how these differ, so that they can make an informed decision about the way that best matches their situation;
 - what they can expect about the process and timeframe for the follow-up of complaints reported.
- **Country Integrity Coordinator** – The role of Country Integrity Coordinator must be assigned to a member of staff at Country Office level, who coordinates and monitors complaints handling. This role is additional to the role of **Code of Conduct Focal Point**, who has an advisory role.
- **Documentation and registration** – Effective and safe systems for documentation and registration must be in place. All complaints must be registered and documented using the standardised Complaint Form. (See annex 2 and section 4.2.)
- **Partners** – Where relevant, partner organisations are supported in developing their complaints handling mechanism. The effectiveness of their complaints handling mechanism is covered in partner monitoring procedures.

5.2 UNDERSTANDING THE LOCAL CONTEXT

Country specific complaints mechanisms should be developed with reference to the local context and the preferences of local beneficiaries, partners and other external stakeholders that can make use of it. At least the following aspects should be considered and discussed locally:

- What existing systems and structures for community feedback and complaints are already in place and how do these work in practice? For instance, are community complaints generally handled by a community leader or a community committee? Are existing systems and structures accessible for vulnerable members of the community?
- In what ways do community members express dissatisfaction? Complaints are perceived differently in different cultures. It is important to acknowledge perceptions and current practice when designing complaint mechanisms. For instance, it may be appropriate to put the emphasis on 'feedback' (positive and negative) or 'comments and suggestions' rather than on 'complaints' in contexts where complaining is not considered to be culturally appropriate.
- Are there potential security risks for beneficiaries and/or project staff? For community members, fear of retaliation can range from a concern that the individual or their community will be excluded from receiving aid or support to the fear that they will be personally persecuted for complaining.

In order to develop good understanding about these and other aspects, community representatives must be consulted in preparation for country specific complaints reporting mechanisms.

5.3 PROCESS STEPS

In order to cover all aspects mentioned above, (at least) the process steps outlined below should be followed in developing or upgrading country specific complaints mechanisms.

Format for country specific complaints reporting procedures

For the development of country specific Complaints Reporting Procedures, this document can be used as a basis.

- Chapters 1, 2 and 3 can be copied unchanged.
- Chapter 4 with the actual reporting options needs to be made country specific:
 - Country specific e-mail address should be specified
 - Country specific telephone number should be specified
 - Where relevant, additional country specific ways of reporting complaints should be defined (resulting from steps 1 and 2 below)
 - Options for reporting at ZOA HQ level (global e-mail and telephone) should be copied.
 - Options for confidential external reporting should be copied
- Chapter 5 can be left out.

• **Step 1: Community consultation**

- Plan and organize meetings (or other forms of consultation, as considered most appropriate) with a fair representation of beneficiaries served, in which the following is discussed:
 - o experiences with current mechanisms for complaints handling by ZOA and suggestions for improvement;
 - o specific points of attention in sharing complaints verbally or in writing with ZOA staff
 - o additional options for communicating complaints that they consider appropriate in their specific context (in addition to the generic options described in section 4.1)
- Maintain the country specific complaints mechanisms, at least once per year.
- Discuss the items indicated above with a fair representation of partner organisations.

• **Step 2: Deciding on (details for) country specific options for communicating complaints**

- Given the generic options for reporting complaints as described in section 4.1, define country specific details:
 - o Country specific e-mail box
 - o Country specific (toll-free) telephone number
- Based on the results of step 1, decide on and describe additional ways of communicating complaints that are appropriate in the local context.
 - o Verbal to any staff member
 - o Any other country specific ways of communicating complaints
- List all options for communicating complaints in Country specific reporting procedures:
 - o context specific
 - o generic options - made country specific
 - o generic options - global

• **Step 3: Internal organisation**

- Decide whom to assign the roles of Country Integrity Coordinator and Code of Conduct Focal Point to. (See general role characteristics in annex 3).
- Arrange for targeted access to country specific e-mail box and telephone number by Country Integrity Coordinator.
- Make arrangements for registration and documentation.
 - o Have the complaints form, translated in all main local languages, used in ZOA programme areas;
 - o Distribute complaint forms with instructions among project locations/staff
 - o Arrange for targeted access of complaints documentation and registration folders by relevant staff, including Country Integrity Coordinator
- Train all (relevant) staff in complaints handling
 - o Complaints mechanism (general standards and country specific)
 - o How to receive and record complaints

- **Step 4: Communication with beneficiaries and other external stakeholders**
 - Develop and implement a plan for community communication, with key messages about:
 - o ZOA in general: organisation, mission, vision, values,
 - o essential information about current projects, including timeframes;
 - o ZOA code of conduct and expected behaviour of staff, with specific attention for PSEAH, Child protection, prevention of fraud and corruption
 - o ZOA's complaints mechanism and how beneficiaries, partners and other external stakeholders can make use of that.
 - Design, arrange for and distribute communication materials – in appropriate languages - as used in communication about complaints handling with beneficiaries and partners, such as:
 - o leaflets, cards;
 - o signboards;
 - o others, as appropriate in local context.

ANNEX 1 - TERMS AND ABBREVIATIONS

- Beneficiaries: people ZOA aims to assist through its projects and programmes.
- CoCFP: Code of Contact focal point - Apart from a Country Integrity Coordinator, each ZOA country should assign the role of Code of Conduct Focal Point to one female and one male staff member. In collaboration with the Integrity Coordinator in the Netherlands the Code of Conduct Focal Points play an advisory role within the country programme concerning the Code of Conduct, Grievance reporting and Complaints reporting.
- Complaint: an expression of protest communicated by anybody who feels negatively affected by ZOA or who believes that ZOA has failed to meet a stated commitment.
- Complainant: a person communicating a complaint.
- CIC: Country Integrity Coordinator - Apart from a Code of Conduct Focal Points, each ZOA country should assign the role of Country Integrity Coordinator to one of its staff members. The Country Integrity Coordinator is responsible for coordinating the process of complaints and grievance handling at country level.
- HQIC: Integrity Coordinator based at ZOA HQ
- Stakeholders: anyone ZOA has identified as having an influence on, or being influenced by its decisions and actions. Apart from beneficiaries and partners, stakeholders can be local or national NGO's, government agencies, local business, local membership organisations, etc.
- Partners: organisations with whom ZOA has a formal arrangement for working jointly to achieve a specific goal, where each partner's roles and responsibilities are set out in a written agreement.
- PSEAH: Prevention of Sexual Exploitation, Abuse, and Harassment (see ZOA Code of Conduct).

ANNEX 2 - ZOA COMPLAINTS FORM

1. Details of the complainant

Name of person complaining:	
Community / organisation: (if applicable)	
Age:	
Gender:	
Contact details: (Tel.nr., e-mail, location, etc.)	

2. In relation to which programme or project (project code) of ZOA is the complaint?

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3. Description of the complaint (think of who / what / where / why / when)

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4. Details of person who received the complaint

Name:	
Function and duty station:	
Date:	

ANNEX 3 - ROLES INVOLVED

Role	Positioned	Role essentials and contact
Country Integrity Coordinator (CIC)	Country	<ul style="list-style-type: none"> Coordinates the process of handling complaints and grievances at country level, in accordance with the procedures of the Integrity Framework. Registers complaints and grievances reported at country level and maintains the status of complaints and grievance handling in the complaints database. <p>Contact details: <a href="mailto:report.<country>@zoa.ngo">report.<country>@zoa.ngo</p>
Country Code of Conduct Focal Point (CoCFP)	Country	<ul style="list-style-type: none"> Advice concerning the Code of Conduct, Grievance reporting, and Complaints reporting Support and assistance in situations of sexual exploitation, abuse, and harassment <p>Each country has a male and a female Focal Point.</p> <p>Contact details: to be defined per country</p>
ZOA HQ Integrity Coordinator (ZOA HQIC)	HQ	<ul style="list-style-type: none"> Coordinates the process of handling complaints and grievances at HQ level, in accordance with the procedures of the Integrity Framework. Registers complaints and grievances reported at HQ level and maintains the status of complaints and grievances handling in the complaints database. <p>Contact details: report@zoa.ngo</p>
ZOA HQ Code of Conduct Focal Point (HQCFP)	HQ	<ul style="list-style-type: none"> Advice concerning the Code of Conduct, Grievance reporting, and Complaints reporting Support and assistance in situations of sexual exploitation, abuse, and harassment <p>A male and a female Focal Point are available.</p> <p>Contact details: female.focalpoint@zoa.ngo and male.focalpoint@zoa.ngo.</p>