



**CHS Alliance Support to Complaints
and Feedback Mechanisms:
Unpacking the Complexity to Address
the Challenges**

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Contents

- Introduction 3**
- Methodology..... 3
- Overview of the Paper 3
- Unpacking Complaints and Feedback Mechanisms 4**
- Feedback and Complaints: Only Part of Quality and Accountability..... 5**
- Fostering the Right Culture in an Organisation..... 5**
- Promoting Clear Codes of Conduct and Hiring the Right People 6
- Moving Beyond Just Welcoming Complaints..... 6
- The CHS Alliance Complaints Mechanism..... 6
- Protecting Whistle-blowers 7
- Leading by Example..... 7
- Influencing Peers..... 8
- The Challenge of Resourcing Complaints and Feedback Mechanisms 8**
- Engaging Donors 8**
- Sharing Resources and Learning 9**
- Visualising Tools 10
- Documenting and Translating Feedback for Decision-Makers 10
- More Structured Learning..... 10
- The Shifting Environment..... 11**
- Regulators and Donors..... 11
- Data Protection and Associated Risks..... 12
- National Human Rights Institutions (NHRIs) 12
- Preventing Sexual Exploitation and Abuse 12**
- Investigations and Certification 12
- Advocacy on PSEA 13
- Inter-Agency Complaints Mechanisms 13
- Justice and Potential Compensation..... 14
- The Ombudsperson Function..... 14
- Misconduct Disclosure Scheme 14
- Navigating the Plethora of Networks..... 15**
- Moving Ahead 15**
- Annex 1: Interview List..... 16**
- Annex 2: Selected List of Resources 17**

Core Humanitarian Standard Commitment 5: *Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.*¹

Complaint: *a specific grievance of anyone who has been negatively affected by an organisation's action or who believes that an organisation has failed to meet a stated commitment.*²

Feedback mechanism: *a formal system established and used to allow recipients of humanitarian action (and in some cases, other crisis-affected populations) to provide information on their experience with a humanitarian agency or the wider humanitarian system. Such information is then used for different purposes, in expectation of a variety of benefits, including taking corrective action to improve some element of the response. Feedback can also be provided informally.*³

Introduction

Complaints and feedback and mechanisms can play essential roles in helping organisations be (more) accountable to the populations with whom – and for whom – they work. They play an important role in surfacing suggestions, ideas, concerns, as well as (potential) cases of sexual exploitation and abuse (SEA), fraud, or corruption. With the recent attention on the necessity to ensure protection from SEA (PSEA), the critical role of effective and accessible complaints and feedback mechanisms is being considered as part of broader discussions around quality and accountability in humanitarian response.

References to complaints and feedback mechanisms appear in various elements related to the Core Humanitarian Standard (CHS): in the Commitments; quality criteria; key actions; guidance notes; and indicators. Verification data collected by the CHS Alliance shows that Commitment 5 of the CHS scores the lowest in terms of implementation of the nine CHS Commitments. Organisations often have policies in place related to complaints and feedback, but putting those policies into practice often proves challenging.

The CHS Alliance commissioned a short consultancy to propose a way forward for its work to help members and others improve feedback and complaints mechanisms. While Commitment 5 focuses on receiving complaints and complaint mechanisms, complaints and feedback mechanisms are linked to all of the CHS Commitments so they cannot be addressed in isolation. There are several areas of potential work for the CHS Alliance to consider taking forward, but these must be seen as part of the broader efforts around quality and accountability (Q&A) and the CHS Alliance's role in helping its members implement the CHS.

Methodology

Thirty interviews were held with 35 individuals and relevant documentation was reviewed to consider good practice in the sector; to look at some of the system-wide approaches to complaints handling; and to identify suggestions of what role the CHS Alliance could play in strengthening complaints and feedback mechanisms in the sector. While several interviewees suggested others with whom to speak, given the limited time for the study (12 days in total), it was not possible to speak with all the individuals suggested. A webinar with some 80 participants was hosted by the CHS Alliance in May to discuss the findings and recommendations prior to finalising this report.

Overview of the Paper

The paper starts by first unpacking the terms “complaints and feedback mechanisms,” given that they are vast topics with many elements, which can involve different parts of organisations. The

¹ Core Humanitarian Standard: <https://corehumanitarianstandard.org/the-standard/language-versions>

² Core Humanitarian Standard, *CHS Guidance Notes and Indicators*, p. 37.

³ Core Humanitarian Standard, *CHS Guidance Notes and Indicators*, p. 38.

paper then looks at the role of complaints and feedback mechanisms in relation to Q&A more broadly. It then explores various areas where the CHS Alliance could consider future work.

Unpacking Complaints and Feedback Mechanisms

Grouping complaints and feedback mechanisms together – without considering their different elements, functions, and challenges – does a potential disservice to both concepts. Implementation may be more difficult if their component parts are not considered. While inter-related, feedback is about ensuring that those affected by crisis are engaged and able to participate in all aspects of a humanitarian response from the very beginning – including what kind of complaints and feedback mechanisms to put into place.

Feedback requires that affected communities and people receive appropriate, accessible information, which is communicated in ways that reach everyone in a community – regardless of their age, gender, (dis)abilities, or diverse characteristics. Feedback mechanisms need to consider how to ensure the engagement and involvement of all individuals: even those who may not be readily visible or vocal. The Grand Bargain’s “participation revolution” highlighted the need to ensure that people receiving aid are included in decisions affecting their lives and that information is accessible. There are different types of feedback, including suggestions, preferences, concerns, or complaints. Feedback can be collected on a routine basis or through complaints mechanisms, which may provide more of a snapshot of a specific instance to be addressed.

Feedback and complaints should be used to adapt programmes, but they can also serve “as an early-warning system for implementation problems and cases of sexual exploitation, abuse and corruption, allowing us to respond quickly and prevent further abuses.”⁴ Different ways of receiving feedback and complaints – which are adapted to the local context and culture – are required. It is essential to ensure that the information gathered through feedback or complaints mechanisms is managed carefully, so as not to cause harm.

The handling of feedback and complaints also require different processes within organisations, particularly if they involve sensitive complaints or allegations, such as SEA. Feedback and complaints mechanisms must be set up to ensure that serious allegations, such as SEA, fraud, or corruption, are addressed immediately and in a way that protects all the individuals involved and provides any support required to survivors of SEA. When feedback is received, it needs to be analysed to ensure course correction of programmes and identify what needs to be done differently. When possible, those providing feedback should find out how their feedback has been used and followed up: closing the feedback loop is essential.

Setting up feedback and complaints mechanisms, in many ways, is fundamentally about engagement with, and participation of, affected people and communities. If people are involved from the beginning, then programmes should be people-centred and be able to adapt to feedback. Even the words “feedback” and “complaints” may not be culturally appropriate, so other terms may need to be found to ensure that people will feel comfortable voicing their suggestions, concerns, and ideas.

There are still many associated challenges that organisations face in responding to feedback. Sensitive complaints are generally understood to be ‘easier’ to address because there are usually systems to address them, however more general feedback in the sense of concerns, ideas, suggestions, etc. is not always so easy to address. What is a critical mass of feedback to which to respond? When do senior managers need to respond to feedback received? If feedback from a few individuals is addressed, is that adequate or does there need to be broader consideration of adapting the programme? Does the feedback of a few individuals warrant wider consultations? These are some of the questions that staff in organisations struggle with as they attempt to put in place

⁴ ICRC and IFRC, *A Red Cross Red Crescent Guide to Community Engagement and Accountability (CEA): Improving communication, engagement and accountability in all we do*, p. 9.

effective feedback and complaints mechanisms. The CHS Alliance could play a useful role by helping members better unpack feedback and complaints mechanisms to address the myriad challenges associated with such mechanisms.

Feedback and Complaints: Only Part of Quality and Accountability

Feedback and complaints mechanisms must be seen as part of a broader commitment to quality and accountability that genuinely puts communities and people affected by crisis at the centre of responses. It means involving them at all stages of a response and helping them to use their agency to make choices that affect their lives and to hold humanitarian organisations to account. While organisations will often say that is what they do, the practice does not always reflect the aspirations.

The fundamental elements of power and power dynamics must not be forgotten when putting in place feedback and complaints mechanisms. As one respondent noted, before the CHS, members of the Humanitarian Accountability Partnership International (HAP International) “were having the right conversations about the power imbalance in humanitarian response.” The lessons from HAP International should not be forgotten and should be built upon. The need to understand and address power dynamics – which is at the heart of accountability – has been largely left aside in the CHS. The references to power are largely limited to the glossary (where accountability is defined) or to the abuse of power in the CHS itself. The key actions, CHS indicators, as well as the recently updated guidance notes in the 2018 Sphere Handbook, fortunately have more references to power. Power analysis and consideration of power dynamics are essential for effective feedback and complaints mechanisms.

Feedback and complaints mechanisms have a link with all of the elements of the CHS: considering them in isolation risks turning quality and accountability into a technocratic, “check the box” exercise. Some interviewed questioned why there are so many references to complaints scattered throughout the CHS Guidance Notes and Indicators. The result is that the current CHS verification processes were seen as potentially too complicated by some, especially when it comes to the fact that complaints mechanisms are measured in relation to some 5 separate CHS Commitments. The fact that there are considerable overlaps between the CHS and the Gender and Age Marker was also highlighted as a concern by some. Questions were raised as to whether Commitment 5 should even be a standalone commitment in the CHS: a consideration for the eventual revision of the CHS, particularly given complaints are linked to so many of the other Commitments.

Genuine participation of communities and people in feedback, as well as complaints mechanisms, must all be seen as intricately linked. Recent studies have shown that despite policies and language about putting people at the centre, many humanitarian organisations are not yet able to do that in a systematic and genuine way.⁵ Internal organisational requirements and cultures, donor obligations, competing priorities, and other pressures can mean that these commitments do not always translate into practice. Any efforts around feedback and complaints mechanisms need to be taken forward within a broader Q&A approach that authentically puts people at the centre.

Fostering the Right Culture in an Organisation

One of the basic elements of promoting effective feedback and complaints is ensuring that staff understand – and sincerely buy into – the need to put people and communities at the centre of a response. It requires fostering a culture within an organisation where feedback and complaints are welcomed, encouraged, and acted upon in a timely manner, without repercussions. If such systems

⁵ See, for example, Daoud, L. *Qu'avons-nous fait de la redevabilité ? Revue des théories et pratiques dans les interventions d'aide en contexte de crise et post-crise*, Groupe URD, 2019 and Maietta, Michel, Eilidh Kennedy, Tyler Rundel, Amy Keith Arnaud Bastin, and Vicky Watt-Smith, *From Voices to Choices: Expanding crisis-affected people's influence over aid decisions: An outlook to 2040*, IARAN, November 2018.

do not work well internally within an organisation, they are unlikely to work well externally, as noted by one respondent.

Promoting Clear Codes of Conduct and Hiring the Right People

Fostering the right culture in an organisation starts with a clear and accessible code of conduct for staff and hiring people that respect that culture. Staff must be trained on the code of conduct and be properly inducted so that they understand the culture of the organisation. It is important to ensure that staff receive regular refreshers on codes of conduct and that they are discussed during (annual) professional development talks between staff and managers. The ACT Alliance, for example, has a 25-minute e-learning course on its learning platform, <https://fabo.org>, on its code of conduct. They also produced a bookmark with the ACT Alliance Code of Conduct in 10 simple bullet points.

Another element that was suggested should be part of recruitments and inductions would be the basic requirement to be empathetic and care about the people with whom, and for whom, we work. Hiring people who are conscious of, and align with, an organisation's values is important. Requiring these fundamental 'soft skills' is often overlooked for more technical skills during recruitments. Such soft skills are essential when working with affected people and communities to build trust, which is a key element in successful feedback and complaints mechanisms.

Trust is also a key element in inter-agency complaints mechanisms, which are generally seen as positive when they work, but they are often too dependent on personalities. A level of trust needs to be established in order for organisations to have faith in such systems, which can risk falling apart when key individuals leave if staff are not recruited with the right soft skills and attitudes to work collaboratively with others from different organisations. It was noted that even ensuring trust between CHS Alliance members is not easy, but building trust is needed for successful mechanisms.

A relatively simple code of conduct that makes expected staff behaviour clear is important, which includes emphasis on ensuring that staff behave well (for example, remind staff to "be nice" was one suggestion). Some organisations were cited as having long, convoluted codes of conduct, resulting in confusion among staff. Some suggested that the CHS Alliance could helpfully develop a common, simple code of conduct, which could be adapted by organisations.

Recommendation for the CHS Alliance:

- 1) Consider developing a simple, common code of conduct to help organisations.

Moving Beyond Just Welcoming Complaints

An important part of an organisation's culture is not only welcoming feedback and complaints, but also removing the associated 'negative' perceptions of receiving complaints. When several organisations published the number of complaints received of SEA following the scandal in 2018, the reaction was not always positive. Some donors felt that a higher number of complaints was a negative indication, instead of appreciating that at least the complaints mechanism was working in some way. In reality, it is likely there are many other cases that went unreported.

Senior managers have an important role to play in encouraging complaints to be brought forward within the organisation so that the culture is also translated into programmes with affected people and communities. The Church of Sweden, for example, has complaints business cards that staff can distribute when they undertake field visits.

The CHS Alliance Complaints Mechanism

While the CHS Alliance has its own [complaints mechanism](#) that allows anyone to complain about members, staff, consultants, or other representatives, not many seem aware of it. It is not advertised as clearly as it could be on the website (it is only at the bottom of each webpage). Complaints can involve SEA cases, so there is scope for it to become an important entry point for SEA cases. Only two complaints per year were received in the last two years, which required investigations or in-depth

follow-up (none, however, were made by people affected by crisis). The organisations involved undertook the process willingly and made changes in practices and procedures as a result.

The Complaints Mechanism could be promoted much more among members and others in the sector. CHS Alliance members could also promote it among affected people and communities. However, with that promotion and encouragement to use it, the necessary resources will need to be put in place to be able to manage the potential increase in complaints in a timely manner.

Recommendation for the CHS Alliance:

- 2) *Promote and encourage greater use of the CHS Alliance complaints mechanism.*

Protecting Whistle-blowers

An area where many organisations still struggle is ensuring whistle-blower protections. While some organisations may have policies in place, they do not always meet best practice standards for whistle-blower protection. It is often staff in organisations that make complaints regarding SEA, fraud, and other misconduct. If they do not feel that they will be protected in the organisation, they are less likely to come forward and lodge a complaint.

Policies to protect whistle-blowers in organisations are not always put into practice. Staff who have complained have reported retaliation and found their contracts not renewed, in some cases. As one interviewee put it, “we have not solved the issue of whistle-blowers.”

Even the term “whistle-blower” is not understood by all and is seen by some to have negative connotations. It was suggested that not all are “born whistle-blowers” so there is a need to create systems that enable staff who may not feel comfortable to come forward with concerns and be treated in a respectful, non-retaliatory manner.

Recommendation for the CHS Alliance:

- 3) *Work with members to ensure they have best practice whistle-blower protection policies in place and help put those intentions into practice to truly protect individuals who file complaints, while considering other ways to describe the term, “whistle-blower,” which may not always be well understood.*

Leading by Example

The importance of senior leadership promoting Q&A – including feedback and complaints mechanisms – was cited by nearly everyone interviewed as being essential to influence the culture of an organisation. If management at all levels of an organisation (from the Board down) sends strong messages about the criticality of putting people at the centre of responses, ensuring genuine participation, and creating a culture that welcomes feedback and complaints, staff of the organisation are more likely to follow.

In some organisations, the operational necessity of being accountable to populations and communities affected by crisis has been one of the driving forces behind senior managers getting on board. Increasingly, those affected by crisis are using technology to make their voices heard. Without the meaningful engagement and participation of affected communities and people, organisations will find it increasingly difficult to deliver humanitarian responses.

For many organisations, however, that buy-in and commitment still remains elusive from their senior managers. Some wondered if the heads of their organisations even knew that they are a member of the CHS Alliance or if they understood the CHS. Q&A are often centred in monitoring and evaluation (M&E) or MEAL (monitoring, evaluation, accountability, and learning) departments. While these staff can develop and implement feedback and complaints mechanisms, they alone cannot change organisational culture without the support and leadership from senior managers. Q&A cannot be successful if limited purely to a MEAL approach: it must be brought in throughout the culture of an organisation.

Influencing Peers

Most senior managers understand the risks associated with fraud or corruption and have systems in place, such as financial audits. There is less understanding of the very real (potential) risks associated with not ensuring Q&A. Few organisations, for example, have regular social audits. While these risks are not always easy to quantify, those senior managers who have understood the importance of Q&A are likely best placed to influence their peers.

Opinions differed about the potential role that the CHS Alliance could play with senior managers. Some thought the CHS Alliance could bring heads of organisations together to encourage peer learning, while others did not feel it to be a role for the CHS Alliance. There is, however, a clear need to get senior managers to understand the importance of quality and accountability.

Recommendation for the CHS Alliance:

- 4) *Find creative ways to get more senior management understanding of, and commitment to, quality and accountability – and more specifically feedback and complaints mechanisms.*

The Challenge of Resourcing Complaints and Feedback Mechanisms

One of the consistent challenges faced by organisations is having the staff, resources, and/or budget to set up and sustain feedback and complaints mechanisms. Setting up feedback and complaints mechanisms in the field requires significant staff time to engage with people and communities. As staff in one organisation put it, “we aspire to do accountability to affected people, but we face time constraints to fit it into our day.” The workload that falls to field staff in terms of reporting requirements – particularly due to donor demands, for example, – has increased enormously in recent years. As another respondent put it, “frontline staff...have to do more work with less resources.”

Mechanisms to effectively follow up on complaints – and particularly sensitive complaints – require staff from different parts of an organisation. They need to be able to have the time to ensure prompt follow-up on such complaints. Having at least one dedicated person in-country on complaints and feedback mechanisms was seen as desirable, by one interviewee, but that was not always possible given limited resources.

Field colleagues in one organisation felt that the time frame of humanitarian programmes was too short to set up an effective complaints mechanism. Development colleagues in that same organisation, on the other hand, felt that they rarely had the resources required to sustain an effective complaints mechanism. Resources pose a very real challenge to many organisations when it comes to setting up effective feedback and complaints systems.

Recommendation for the CHS Alliance:

- 5) *Consider research (or other ways) to quantify and detail the true costs associated with setting up and maintaining feedback and complaints mechanisms so donors and senior managers understand the costs.*

Engaging Donors

Donors can play a positive role around complaints and feedback mechanisms, but there are also areas where improvements could be made. With the Safeguarding Summit in 2018 and the pressure from donors, there are concerns that separate discussions and systems risk being set up within organisations to address SEA complaints. For example, some organisations were having conversations with human resource departments and senior managers about PSEA, but were struggling to make the links with programme staff.

Any feedback and complaints system must have a way to fast-track sensitive complaints around SEA, fraud, or corruption. In order to fast-track sensitive complaints, at least two staff (in case one is out of the office) in an organisation need to be responsible for following up in a timely matter.

Some donors require documenting how feedback is collected, which was seen as a potentially positive move. However, there is a risk that if donors treat complaints and feedback mechanisms as simply another ‘compliance’ measure, organisations will put something in place without ensuring that it really works. There are also concerns related to ensuring the protection of the data collected (*see further below*).

Donors often require financial audits in their agreements, while some do not systematically require a complaints mechanism or policies regarding staff conduct or preventing SEA (PSEA). International NGOs that partner with local or national NGOs often do not have such requirements in their partner agreements. Most UN agencies have such clauses in their contracts and the 2018 [UN Protocol on SEA Allegations Involving Implementing Partners](#) will likely have further implications for contracts.

Some interviewed felt that donors were not as flexible as they could be when it came to designing or adapting programmes based on feedback. The “log frame problem,” as one interviewee put it, further hampers efforts to put in place complaints and feedback mechanisms. Donors often see log frames as the only way to measure the success of a programme, but what is more important is the impact of a programme on communities and ensuring that a programme can adapt to feedback. It was suggested that the CHS Alliance – after consulting its members – could play an important role with donors in terms of advocacy.

Recommendations for the CHS Alliance:

- 6) *Following consultations with members, consider concerted advocacy with donors around feedback and complaints mechanisms, as part of quality and accountability.*
 - *Convene roundtables with donors and NGOs to help donors understand the actual amount of work and resources required in developing and sustaining feedback and complaints mechanisms.*
 - *Work with donors to develop preferred language/clauses to include in donor/partner contracts around feedback and complaints mechanisms, which would also ensure the flexibility to adapt programmes to feedback from affected communities and people.*

Sharing Resources and Learning

There are numerous resources and tools available around complaints and feedback mechanisms. There were calls – from nearly all those interviewed – for the CHS Alliance to share resources and tools with, and among, members. It was suggested that such examples should clearly indicate, *inter alia*, how the mechanism was prepared, why it was chosen, and what are the critical aspects to which to pay attention. There are currently many different available tools, but it is not always easy to know where to find them, which ones are good examples to follow, or to know which ones would help organisations better meet the CHS. One interviewee [not from Groupe URD] wondered if Groupe URD’s [Quality & Accountability COMPAS](#) could perhaps be the ideal way to implement the CHS and whether it should be promoted among donors.

Among the numerous tools and examples highlighted as good practice during the interviews – in addition to the ones mentioned elsewhere in this paper – were the following:

- [Awaaz Afghanistan](#), a free call centre that allows feedback and complaints to be received and passed to partners for follow-up;
- [DRC’s Complaints Mechanism Handbook](#) (2008);
- [Ground Truth’s](#) work with the [CHS Alliance in Chad](#) as a good approach to feedback;
- [IASC Best Practice Guide: Inter-Agency Community Based Complaint Mechanisms](#) (2016);
- ICRC’s/IFRC’s [A Red Cross Red Crescent Guide to Community Engagement and Accountability \(CEA\): Improving communication, engagement and accountability in all we do](#) (2016);
- ICRC is working with <https://www.sword-group.com/en/> to adapt off-the-shelf software to ensure more systematic management of feedback and complaints.

- [IFRC's Feedback Starter Kit](#) and [IFRC's Complaints and Feedback Tracking Table](#), which allows for data visualisation and tagging data using Humanitarian Data Exchange (HDX) language for comparability;
- [IRC's Client Responsiveness Framework and Programming](#);
- [Listen, Learn, Act \(LLA\)](#), which developed a training course and learning platform [though not currently accessible from the site] to measure and improve CHS compliance; and
- [Mercy Corps' Adaptive Management](#), which allows for programmes to adapt to feedback.

Recommendations for the CHS Alliance:

- 7) *Systematically share useful tools and resources, highlighting their key aspects and how they can help organisations implement the CHS.*
- 8) *Support and promote more common feedback mechanisms, as it is currently being done in Chad with Ground Truth Solutions, which was cited by many as a positive example.*

Visualising Tools

Pulling together tools and resources that are rated highly by the CHS Alliance secretariat, including policies, posters, and illustrations would be a further useful contribution. It was also suggested to find ways to visualise various tools, for example using infographics, to help contextualise them.

World Vision International developed a useful visualisation of the “Steps to Implement Complaint and Response Mechanisms” in their 2008 [Complaint and Response Mechanisms: A Resource Guide](#).

Recommendation for the CHS Alliance:

- 9) *Find creative ways to visualise tools and resources around complaints and feedback mechanisms.*

Documenting and Translating Feedback for Decision-Makers

Many of those interviewed want better ways to document and translate feedback for decision-makers within their organisations. Documenting all feedback can become quite time-consuming. In many cases, when feedback could be immediately addressed, staff did not necessarily think to document it. When feedback is documented, it is not always easy to make that feedback easily accessible for decision-makers. One interviewee noted how almost all organisations in one setting were using Microsoft Excel to track feedback, but felt that there might be other tools available that could help to better visualise feedback for senior managers. However, IFRC developed open source Excel templates for feedback, given that it is widely available software, which can visualise the data.

Even once feedback can be visualised, some interviewees felt there were still gaps in how to get senior managers to act on the feedback. Highlighting what kinds of information senior managers need around feedback and complaints to enable their decision-making would be helpful. As one person put it: it's hard to get senior managers to respond to feedback from 0.1% of a population and to get them to make changes. It was suggested that guidance from the CHS Alliance on what constitutes a critical mass of feedback could be useful in influencing senior managers. The potential associated risks with such guidance then hampering decisions without a certain amount of feedback was also recognised.

Recommendations for the CHS Alliance:

- 10) *To help get the buy-in and engagement of senior managers/decision-makers, identify what critical information would best influence them and how it could best be shared/visualised.*
- 11) *Consider developing a resource for (senior) managers focused on the implications of feedback to help them understand the need to ensure the necessary course correction of programmes.*

More Structured Learning

While sharing tools and resources is one concrete way to promote feedback and complaints mechanisms, interviewees suggested that the CHS Alliance could provide more learning events. They

could be done on a regional basis so that common issues and challenges could be addressed. E-learning could be another approach.

Organising learning events around specific topics to make the events more useful and targeted to different types of staff within organisations was suggested. For example, an event could be focused on the role of human resources in feedback and complaints mechanisms: from induction to performance reviews to professional development to following up on complaints.

It is clear that feedback and complaints should ideally be received through a variety of means. Face-to-face feedback – when trust is established – as well as hotlines were viewed by many as being amongst the most effective means of receiving (serious) complaints. However, not all organisations have the resources (staff or financial) to put into place such mechanisms. Some interviewees noted that complaints boxes – while still used widely – were among the worst ways to gather complaints and feedback. While complaints – or “suggestion boxes” (viewed as being more culturally acceptable in some places) – can play an important role, they cannot be the only way for complaints to be received. A learning event could bring together programme staff who have set up feedback and complaints mechanisms to share lessons and good/bad practice.

One interviewee pointed out that there seems to be a ‘black hole’ around how organisations learn. Given that organisations are supposed to continually learn as part of the CHS, the CHS Alliance could usefully help organise learning events/workshops around how to facilitate organisational learning, particularly given that feedback should influence such learning. One respondent questioned whether organisational culture may, in fact, be the weakest spot in the implementation of the CHS.

Another area where the CHS Alliance was called on to do more systematic analysis was with regards to the NGO self-assessments, peer reviews, and Humanitarian Quality Assurance Initiative (HQAI) audit reports. Pulling out elements related to feedback and complaints mechanisms could highlight the various challenges, learning, and progress faced by organisations to help others.

Recommendations for the CHS Alliance:

- 12) Ensure that learning events and webinars are focused on particular topics and targeted at different types of staff members within organisations and targeting different regions.*
- 13) Consider developing e-learning courses on feedback and complaints mechanisms.*
- 14) Undertake systematic analysis from the verification processes to highlight challenges, learning, and progress around feedback and complaints mechanisms.*
- 15) Continue to provide training on codes of conduct and complaints mechanisms, but update and adapt these based on the more systematic analysis of verification findings.*
- 16) Systematically explore with members good (and bad) examples of setting up complaints and feedback mechanisms.*

The Shifting Environment

With the scandals of 2018 related to SEA in the humanitarian community, a number of developments have taken place that could be potential game changers for NGOs. While many are specifically related to PSEA, they could have broader potential implications.

Regulators and Donors

Charity commissions or national NGO regulators could increasingly play a significant role when it comes to the oversight of serious complaints. The UK Charity Commission, for example, already requires NGOs to report serious incidents. The CHS Alliance could play an important role in helping members understand the latest regulations of NGO regulators and donors when it comes to matters related to sensitive complaints: SEA cases, fraud, corruption, and counter-terrorism legislation. Some of the legal liability issues that NGOs have faced – and could face in future – with regards to the links between (serious) complaints and the duty of care of staff should be considered.

Data Protection and Associated Risks

There are concerns that the data collected through feedback could potentially put organisations at risk of being in violation of counter-terrorism legislation and related donor requirements. Additionally, there seem to be increasing concerns around “confidentiality,” particularly since the European Union General Data Protection Regulation (GDPR) came into effect, which risks undermining opportunities for organisations to work together when it comes to developing joint feedback and complaints mechanisms. One interviewee noted that confidentiality is sometimes “working against us.” In one setting, concerns over who would open a complaints box led to three organisations each setting up their own complaints box to avoid staff from other organisations seeing any potential complaints.

National Human Rights Institutions (NHRIs)

Past discussions around accountability have explored NHRIs, but the potential role of NHRIs in feedback and complaints remains to be fully explored. The Office of the High Commissioner for Human Rights supports the establishment and strengthening of NHRIs. The [Global Alliance of National Human Rights Institutions](#) reviews and accredits NHRIs. NHRIs contribute to “strong and dynamic civil society organizations”⁶ and, as such, could play a significant role in supporting feedback and complaints within NGOs. They could receive complaints and feedback from individuals.

Recommendations for the CHS Alliance:

- 17) *Given the shifting legal and regulatory environment in many countries, help members navigate the changes through research and analysis.*
- 18) *Consider advocacy vis-à-vis national regulatory bodies to ensure legislation/rules are in line with the CHS and ensure that members are able to comply with such requirements.*
- 19) *Continue work previously started under HAP International with national verification bodies as a way to further promote the CHS and CHS certification at national levels, which could make certification more accessible for local/national organisations.*
- 20) *Given the risks associated with data and confidentiality, support CHS members to better mitigate risks and understand how to balance confidentiality with inter-agency/joint feedback and complaints mechanisms.*
- 21) *Explore the potential role of NHRIs with regards to feedback and complaints mechanisms, both in terms of supporting NGOs and potentially receiving feedback and complaints.*

Preventing Sexual Exploitation and Abuse

(NB: This section complements the findings of the scoping study done for the CHS Alliance in 2018.⁷)

Investigations and Certification

Handling complaints related to SEA is an area where the CHS Alliance has significant expertise and potential, thanks in large part to the work done by its predecessor: the Building Safer Organisations Project (originally hosted by the International Council of Voluntary Agencies (ICVA) and then moved to HAP International). The investigations trainings are widely appreciated, but the pool of investigators that can be called upon needs to be expanded to be able to support organisations that may not have their own internal investigations capacity.

There is also a need to look at the CHS certification process and how organisations are ensuring PSEA. While the CHS Alliance PSEA Index was cited as being helpful, it was also felt by many that PSEA is not adequately addressed in the CHS. One suggestion was that the revised CHS should have a separate Commitment on PSEA. In order not to create duplicate systems, the CHS Alliance should consider engaging with HumanitarianHR, which is, “developing a certification process for

⁶ See webpage on OHCHR and NHRIs: <https://www.ohchr.org/en/countries/nhri/pages/nhrimain.aspx>

⁷ Naik, Asmita, *PSEA: Enhancing CHS Alliance’s Support to Members: Scoping Study Summary*, CHS Alliance, December 2018.

organizations to demonstrate that they meet the highest standards in protecting vulnerable populations from sexual exploitation and abuse.”⁸

Recommendations for the CHS Alliance:

- 22) *Expand the pool of investigators through trainings and trainings of trainers.*
- 23) *Develop a pool of (CHS Alliance certified) investigators that have proven investigations experience and which can be called upon by organisations to carry out investigations.*
 - *Work with the OCHA Fund for Investigations into SEA and Sexual Harassment to promote the CHS Alliance’s pool of (certified) investigators, as the Fund currently will not maintain a roster, train investigators, nor build investigative capacity.⁹*
 - *Make links with other organisations offering SEA-specific investigators, such as [HumanitarianHR](#), or that have investigative capacities and which might potentially move into SEA investigations, such as [Justice Rapid Response](#).*
- 24) *Consider engaging with [HumanitarianHR](#) to ensure that any certification system around PSEA does not duplicate (or conflict) with the CHS assessment process.*

Advocacy on PSEA

While NGOs were under considerable pressure in the lead-up to the 2018 Safeguarding Summit, the CHS Alliance and its members may have missed some strategic opportunities. However, the CHS Alliance is still seen by many as being well positioned to be a strong voice on behalf of NGOs on PSEA, while pushing for better responses to SEA by its members.

A concern pointed out by many interviewed was that with the recent changes in the IASC’s structure, the space for discussion on PSEA between the UN and NGOs has been reduced. Since 2017, the UN has been working on PSEA and releasing policies (some of which impact NGOs), but with limited engagement or discussions with NGOs.¹⁰ The CHS Alliance could be a strong advocate for a forum for the UN and NGOs to discuss and collectively tackle PSEA.

Recommendation for the CHS Alliance:

- 25) *Act as a strong advocate for PSEA on behalf of NGOs and find ways to engage with UN agencies and with the UN Special Coordinator to Improve the UN Response to SEA to ensure complementarity and to bring the CHS Alliance’s expertise to the UN’s work on PSEA, including their development of a system-wide UN Manual on PSEA.*

Inter-Agency Complaints Mechanisms

There are numerous good practices around PSEA and inter-agency complaints mechanisms that are identified and showcased in the [IASC Best Practice Guide: Inter-Agency Community Based Complaint Mechanisms](#) (CBCMs) and the training on inter-agency CBCMs. Some interviewees thought the Guide, while impressive, was too long for most to effectively use. The CHS Alliance could pull out various good practice elements to promote the best practices with members, including for example: the three good practices in designing inter-agency complaints channels; explaining a PSEA policy in a trifold leaflet like UNHCR has done; promoting a simplified version of the 6 PSEA principles; and promoting links with local actors, such as legal organisations or women’s groups to support survivors and to seek justice.

While the positive elements of inter-agency CBCMs have been well acknowledged over the years, they are still not common practice. The CHS Alliance could find ways to further promote the uptake and acceptance of inter-agency CBCMs, given that they make it easier for affected people to provide feedback and complaints.

⁸ Colleen Striegel, HumanitarianHR: <https://humanitarianhr.org/call-to-action>

⁹ See OCHA Fund flyer: https://www.unocha.org/sites/unocha/files/OCHA_SEA_Fund_flyer.pdf

¹⁰ See *Fact sheet on the Secretary-General’s initiatives to prevent and respond to sexual exploitation and abuse*, January 2019.

There are concerns that when inter-agency PSEA networks are set up, they do not always consider the perspective of NGOs – and they are not consistently set up in countries. It was suggested that the CHS Alliance could advocate for having NGO co-chairs for in-country PSEA networks, as well as to work with IOM to develop training for inter-agency PSEA focal points. Promoting the set-up of inter-agency PSEA networks in all countries where there is a humanitarian response was also suggested.

Recommendation for the CHS Alliance:

- 26) *Work with CHS Alliance members to build the trust necessary to develop and support inter-agency complaints mechanisms.*
- 27) *Ensure CHS Alliance members are aware of inter-agency PSEA networks in countries, promote the set-up of such networks, encourage NGOs to be part of such networks, and advocate for NGOs to co-chair these networks (and for the necessary resourcing).*
- 28) *Promote and advocate for the minimum requirements to handle sensitive complaints received through inter-agency complaints and feedback mechanisms.*

Justice and Potential Compensation

The whole area of seeking justice for survivors – and even potential compensation – of SEA is an area that requires much further exploration and work. In addition to looking at “whistle-blower” protections, there is a need to ensure that survivors are protected, receive the care they need, and are supported through the process of investigations and seeking justice. Too often, organisations focus on their internal systems and processes without adequately considering how to make the response more survivor-centred.

Recommendations for the CHS Alliance:

- 29) *Explore the value of partnerships among CHS Alliance members with local women’s groups and legal aid groups to support survivors to seek services and justice, where possible.*
- 30) *Explore possible ways for survivors of SEA to seek justice and potentially compensation.*

The Ombudsperson Function

In the lead-up to the 2018 Safeguarding Summit, numerous commitments were made to address SEA. Some of these are quite UK focused, such as the humanitarian passport. With the discussions around an Ombudsperson function for SEA cases, which was tabled by The Netherlands at the Summit, there is an opportunity to look at ways in which such a function could potentially link with, and support, NHRIs. The UN General Assembly has also passed several resolutions around “the role of the Ombudsman, mediator and other national human rights institutions in the promotion and protection of human rights.”¹¹

Most interviewees felt that the CHS Alliance should play an active role in engaging with the PSEA Ombudsperson initiative and pilots, while some felt that there might be a conflict of interest if not managed carefully.

Recommendation for the CHS Alliance:

- 31) *Continue to engage with the Dutch initiated Ombudsperson initiative to ensure experiences are taken on board and encourage links with existing mechanisms in-country.*

Misconduct Disclosure Scheme

The voluntary [Misconduct Disclosure Scheme](#), initiated by the Steering Committee for Humanitarian Response (SCHR) is an important step in sharing information between organisations during recruitment processes “about people who have been found to have committed sexual abuse, sexual exploitation or sexual harassment “Misconduct” during employment.” The scheme, while relatively new, could be an important contribution towards PSEA.

¹¹ See webpage on OHCHR and NHRIs: <https://www.ohchr.org/en/countries/nhri/pages/nhrimain.aspx>

Recommendation for the CHS Alliance:

32) *Promote awareness of the Misconduct Disclosure Scheme amongst CHS Alliance members and encourage them to join.*

Navigating the Plethora of Networks

In recent years, there have been an increasing number of networks and forums focused on accountability; communicating or engaging with communities, feedback, and participation, including – *inter alia* – ALNAP; Communicating with Disaster Affected Communities (CDAC); Communication and Community Engagement Initiative (under the auspices of CDAC); Feedback Labs; the IASC’s Results Group (formerly Task Team) on AAP/PSEA; the Grand Bargain Localisation work stream; and RefLECTION. In the lead-up to the 2018 Safeguarding Summit, different NGOs, such as ICVA, carried out work around PSEA. In the UK, as part of its efforts to ensure better safeguarding practice, BOND members with DIFD and the UK Charity Commission have four working groups on 1) Accountability to people we work with; 2) Organisational culture; 3) The employment cycle; and 4) Reports and complaints mechanisms.¹²

With so many different initiatives – all contributing potentially important and useful work – it becomes increasingly difficult for NGOs (including members of the CHS Alliance) and others to navigate which are the most important initiatives with which to engage. The proliferation of such networks and initiatives is not necessarily helping staff to clarify how to be better at Q&A. Bringing these initiatives together to see where they can join forces would be useful and would help to ensure that efforts are not being diluted, duplicated, or damaging to each others’ work.

Recommendation for the CHS Alliance:

33) *Work with other networks to help clarify how different elements contribute to Q&A generally, as well as to the implementation of the CHS.*

Moving Ahead

Organisations see a clear role for leadership and support from the CHS Alliance when it comes to complaints and feedback mechanisms. While there are numerous recommendations of what the CHS Alliance could do, moving forward, some can be put in place more easily than others. There is a need to consider which of the recommendations to prioritise in order to best support the CHS Alliance’s members and the broader sector.

As a network, the CHS Alliance is well-placed to advocate around issues related to feedback and complaints mechanisms that its individual members may not feel comfortable doing. While many related policies – and the CHS itself – can look good on paper, putting that policy into practice still requires a great deal of work. Unpacking and tackling the different elements related to the concepts of feedback and complaints and making the links to broader Q&A will be an important step forward.

¹² See https://www.bond.org.uk/ngo-support/safeguarding#sector_safeguarding_working_groups

Annex 1: Interview List

In addition to those who participated in the webinar on 8 May 2019, the following were interviewed:

ActionAid Kenya, Makena Mwobobia
BOND, Franzisca Schwarz
CDAC Network, Marian Casey
ChristianAid, Catherine Skehan
CHS Alliance, Karen Glisson
CHS Alliance, Miranda Brown
Church of Sweden, Coleen Heemskerk
Coast Trust, Sanat Bhowmik
Coast Trust, Iqbal Uddin
Consultant, Asmita Naik
Groupe URD, Lisa Daoud
Groupe URD, Veronique de Geoffroy
GUK, Abdus Salam
HQAI, Claire Goudmit
ICRC, David Loquercio
IFRC, Alexandra Sicotte Levesque
IMC, Michael Gall
IOM, Mariska De Keersmaecker
IOM, Alexandra Hileman
IOM, Anna Reichenberg
IRC, Farida Bena
IRC, Chloe Whitley
LWF, Allan Calma
Medical Aid for Palestinians, Melanie Coyne
Nabaa, Yasser Dawoud
Netherlands, Doris Voorbraak
OFADEC, Mamadou Ndiaye
Oxfam, Marta Valdes Garcia
Oxfam, Carly Sheehan
Save the Children, Cat Carter
Save the Children, Eline Severijen
SCHR, Kate Half
Sphere, Christine Knudsen
Switzerland, Anne de Riedmatten
UNICEF, Charles-Antoine Hofman

Annex 2: Selected List of Resources

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