

GUIDANCE

MANAGING COMPLAINTS: A BEST-PRACTICE GUIDE FOR AID ORGANISATIONS

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01

INTRODUCTION

In an organisational setting, managing complaints requires a careful, systematic, and compassionate approach, particularly when dealing with complaints of sensitive nature. Such complaints can have significant personal, legal, and reputational implications, and the way they are handled can be testament to an organisation's values and commitment to its staff and stakeholders.

In this guide, we outline key steps and considerations for effectively recognising and managing a complaint, particularly sensitive ones, while ensuring fairness, transparency, and care throughout the process.

The following have been developed to support organisations in navigating these sensitive matters with the highest level of professionalism and empathy. This guide is complemented by:

- A toolkit, which includes tools, templates, and other resources to support the complaint management process.
- An eLearning module, with five short sections exploring the fundamentals underpinning all complaint management systems pre- and post-investigation; the different aspects of receiving, classifying, and channelling complaints, and the process for managing complaints that are sensitive, non-sensitive, and those related to sexual exploitation, abuse, and harassment (SEAH).



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PURPOSE OF THIS GUIDE

Commitment 5 of the Core Humanitarian Standard on Quality & Accountability¹ (CHS) establishes that people and communities in situations of crisis and vulnerability should have access to safe, inclusive, and responsive means to report misconduct and complaints.² The CHS's objective is to ensure that everyone knows and meets the behavioural expectations for an organisation's staff, volunteers, and partners, especially regarding inappropriate behaviours and abuse.

Commitment 5 also asks organisations to implement secure channels for reporting misconduct, managing complaints promptly and fairly, prioritising victim-centred approaches, and redirecting issues beyond the organisation's scope to appropriate parties, in line with good practice.

However, evidence repeatedly shows that aid organisations universally struggle the most with Commitment 5.

The purpose of this guide is therefore to help organisations meet this commitment and provide them with advice for managing a complaint, with a focus on sensitive ones, from the moment it arrives within the organisation to the point where it is referred to an investigation process (the pre-investigation phase of case management).

The primary objectives are to:

1 Support organisations in developing effective complaint management systems that ensure protection of concerned parties, timely responses, early detection of harm, and preventative measures for future incidents.

2 Regardless of the size or resources of an organisation, support them to uphold and apply consistent principles of practice across various contexts to ensure complaints are handled uniformly, to help foster a sense of fairness and trust.

3 Increase awareness about an organisation's commitment to managing complaints appropriately, and ensure entities or individuals are held accountable for their actions, especially when they breach laws or ethical standards.

¹ Core Humanitarian Standard (CHS), <https://corehumanitarianstandard.org/the-standard>

² The term complaint is used throughout this document to mean an expression of dissatisfaction about standards of service, actions, or lack of action by an organisation or its staff, volunteers, or anybody directly involved in the delivery of its work. It is a criticism that expects a reply and would like things to be changed. Some organisations may prefer the term concern or report, depending on organisational culture or context.

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SCOPE OF THIS GUIDE

The guide focuses on the initial steps of the complaint management process, starting from when a complaint is received and concluding when an investigation commences, with an additional section on how to manage sensitive complaints after an investigation is complete.

Initial complaint management process



The guide covers the receipt, acknowledgement, classification, and proper channelling of a complaint, with a dedicated section on SEAH complaints, given their specific nature and the requirements necessary to manage them. It explains the importance of each role in the complaint management process and ways to manage the process, no matter the size or nature of an organisation.

This guide is part of a collection of CHS Alliance resources aimed at facilitating an efficient complaint mechanism and complaint management process. This guide does not outline how to set up a complaint mechanism, methods for receiving a complaint (such as digital or mailbox channels for reporting), or how to conduct detailed investigation procedures or resolution processes. However, the table on the next page outlines the key resources that may help you in these specific areas, and how this guide sits alongside these existing resources.

STAGE IN COMPLAINT MANAGEMENT PROCESS	AVAILABLE RESOURCES
1: Effective complaint mechanism system in place	<ul style="list-style-type: none"> • CHS Alliance, 2015, Effective Complaint Mechanism (https://www.chsalliance.org/get-support/resource/effective-complaints-mechanisms/)
2: Complaint received and reviewed (pre-investigation)	<ul style="list-style-type: none"> • CHS Alliance, 2023, Managing complaints: A best-practice guide for aid organisations, (https://www.chsalliance.org/get-support/resource/A-best-practice-guide-for-aid-organisations/) • CHS Alliance, 2023, Managing complaints: A best-practice toolkit for aid organisations (https://www.chsalliance.org/get-support/resource/A-best-practice-toolkit-for-aid-organisations/) • CHS Alliance, 2023, Managing complaints: eLearning modules for aid organisations (https://www.chsalliance.org/get-support/resource/eLearning-modules-for-aid-organisations/)
3: Investigation takes place	<ul style="list-style-type: none"> • CHS Alliance, 2022, Sexual Exploitation, Abuse and Harassment (SEAH) Investigation Guide, (https://www.chsalliance.org/get-support/resource/sexual-exploitation-abuse-and-harassment-seah-investigation-guide/) • CHS Alliance, 2015, Guidelines for investigations, A guide for humanitarian organisations on receiving and investigating allegations of abuse, exploitation, fraud or corruption by their own staff (https://www.chsalliance.org/get-support/resource/guidelines-for-investigations/)
4: Case management post-investigation	<ul style="list-style-type: none"> • Section 8.6 of this guide

3.1 MANAGING SENSITIVE COMPLAINTS

This guide focuses on the management of sensitive complaints, rather than non-sensitive complaints or feedback.

Sensitive complaints encompass breaches of an organisation’s ethical standards and code of conduct, and include complaints of sexual exploitation, abuse and harassment, corruption, and/or fraud.

Although non-sensitive complaints are not specifically addressed, [Section 7](#) of this guide is dedicated to differentiating between non-sensitive and sensitive complaints.

3.2 TARGET AUDIENCES

This guide is targeted at organisations working in development or humanitarian action in any location or context, regardless of size. Organisations can mean international, national, local, non-governmental and community-based organisations, charities, government, donors, United Nations agencies, academic groups, inter-agency groups, or companies.

The guidance is also applicable to any complaint mechanism that an organisation may already have in place, whether it be used by those they seek to serve (i.e. crisis-affected people and community members), or by those who represent or collaborate with the organisation (i.e. staff, directors, consultants, volunteers, interns, incentive workers, trustees, suppliers, donors, partner workers, or a spokesperson for the organisation).

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STRUCTURE AND METHODOLOGY

4.1 STRUCTURE OF THE GUIDE

The guide is set out in six key areas:

- **Sections 1-4:** introduction, purpose, scope, and structure.
- **Sections 5 & 6:** core principles to integrate systematically with your process, with supporting policy and practice.
- **Section 7:** different types of complaints an organisation may receive.
- **Section 8:** the complaint management process, setting out how to receive, acknowledge, classify, and channel a complaint pre-investigation, and the steps to take post-investigation.
- **Sections 9 & 10:** guidance for managing different types of complaints, including SEAH complaints, the different roles and responsibilities organisations may use, and guidance for different sized organisations.
- **Section 11:** a glossary of terms used.

4.2 METHODOLOGY

This guide is based on extensive consultations with staff and experts dealing with complaint management across a variety of organisations, including safeguarding investigators, fraud and corruption investigators, internal audit, and board members. In addition, over 80 CHS Alliance members' complaint policies were reviewed, as well as recent writings and documents in the field.

Additional input was received from multiple experts and CHS Alliance members participating in a lively Community of Practice session on the topic. All efforts were made to consider a broad and diverse range of actors and viewpoints from small and big organisations alike, and to distil what amounts to good practice.



05

CORE PRINCIPLES FOR A COMPLAINT PROCESS

The following set of core principles will help you establish an internal process for managing complaints in a safe, fair, timely, and appropriate manner.



Each principle should be:

1. Written in your organisation's policy.
2. Included in your organisation's process.
3. Applied in practice when staff manage complaints.

Each principle has key sub-elements and applies equally across your organisational system, regardless of the size of your organisation. Below, we explore each principle in turn.

5.1 CONFIDENTIALITY

Confidentiality is crucial when handling complaints to protect the privacy, safety, and well-being of the individuals involved.

To ensure your system is confidential:

- ✓ Share complaint details strictly on a "need-to-know" basis and uphold robust standards for data protection in compliance with regulations such as General Data Protection Regulation (GDPR).
- ✓ Establish secure data management practices, including what, when, and why information is shared, while particularly limiting access to sensitive complaint data.
- ✓ Utilise secure storage methods, anonymise data where applicable, and offer anonymous complaint avenues to protect identities.



5.2 ACCOUNTABILITY

Accountability and transparency are essential when handling complaints to ensure trust and fairness, and to demonstrate the organisation's commitment to addressing issues responsibly.

To ensure your system is accountable:

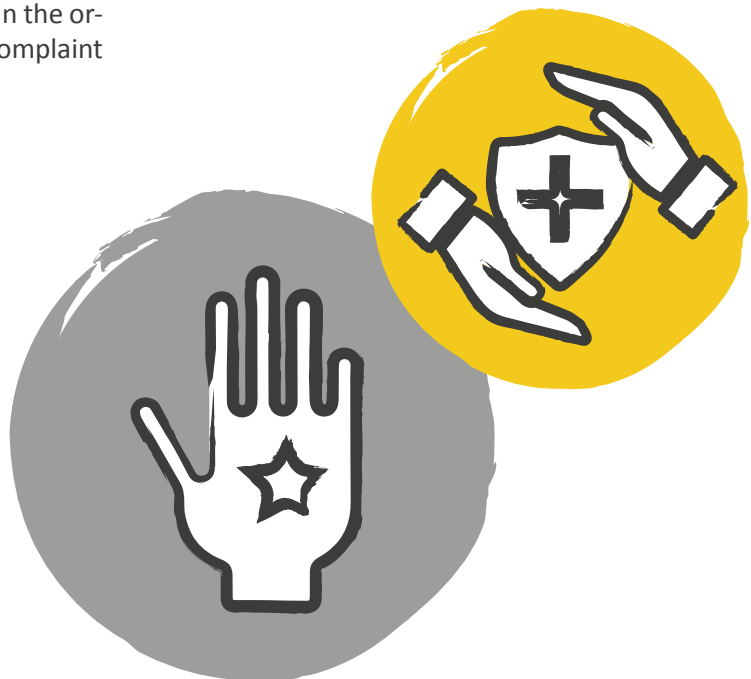
- ✔ Ensure strong commitment from senior leadership to promoting accountability, by, for example, endorsing timely and a repercussion-free process, and ensuring the establishment of policies and resources for ethical conduct and effective complaint management.
- ✔ Assume responsibility for work outcomes and cultivate a culture of honesty and open dialogue.
- ✔ Clearly communicate to all involved parties the organisation's dedication to resolving the issue, explain the steps in the complaint process, provide available resources, and update everyone on the outcomes.
- ✔ Listen and respond to stakeholder feedback, assigning specific roles within the organisation for effective and fair complaint management.
- ✔ Treat each complaint seriously, be transparent about the complaint process, and know when to escalate high-risk issues.
- ✔ Share complaint statistics with appropriate bodies and regulators. Ensure no individual can be identified when sharing information.

5.3 SAFETY AND WELL-BEING OF INDIVIDUALS

Ensuring the safety and well-being of individuals is paramount when handling complaints, to prevent harm and uphold trust.

To ensure your system is safe:

- ✔ Make the complaint process widely available to everyone and encourage an organisational culture where complaints can be raised without fear.
- ✔ Identify and mitigate risks to shield all involved parties from harm and retaliation.
- ✔ Eliminate any form of bias or discrimination based on factors such as gender, ethnicity, or rank by fostering an inclusive environment, implementing comprehensive training programmes, and ensuring regular reviews of policies and practices.
- ✔ Provide appropriate well-being interventions to all parties and ensure specialised support for victims/survivors of SEAH.



5.4 A PREVENTATIVE AND RESPONSIVE PROCESS

A fully functioning system for managing complaints may prevent further abuses and misconduct but also enable to respond to complaints. It creates and enables a safe and supportive workplace culture.

To make your complaint management process preventative and responsive:

- ✔ Ensure leadership and senior management support the process, and thoroughly train all involved staff in effective complaint management technique.
- ✔ Quickly acknowledge complaints and maintain open lines of communication to assure complainants and minimise harm.
- ✔ Record all complaints and analyse trends to enable early detection of systemic issues, helping in prevention.
- ✔ Increase awareness of complaint policies and display clear reporting pathways to demonstrate organisational commitment.
- ✔ Take appropriate disciplinary actions for verified complaints and keep all relevant parties informed.
- ✔ Maintain meticulous records, ensure compliance with relevant laws, and seek legal advice for issues.
- ✔ After resolving each complaint, review the process for improvements and allocate resources for future investigations and implementations.

5.5 CONTEXTUALISATION

Contextualisation is crucial when addressing complaints, to ensure a tailored and culturally appropriate response.

To ensure the context is being considered:

- ✔ Be sensitive to local customs and legal regulations that impact how complaints are made and managed.
- ✔ Consider the size and resource constraints of your organisation when shaping your complaint process.
- ✔ Understand key stakeholder relationships and align your complaint process with internal policies and goals.
- ✔ Evaluate the urgency, scope, and risk level of each complaint to tailor your response appropriately.
- ✔ Meet context-specific norms for privacy and choose the most effective communication channels.
- ✔ Establish metrics for evaluating the process and allow for ongoing stakeholder input as contexts evolve.

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POLICY AND PRACTICE SUPPORTING THE COMPLAINT PROCESS

To ensure your staff or any people associated with your organisation, communities, and stakeholders know about your core principles, you need to arrange them into a set of policies or policy statements.

These policy-level commitments will not change, regardless of the size, sector, or resource levels of your organisation, and form an overarching ‘accountability policy framework’.

A complaint management system is most effective when implemented as part of this framework. Whether they are included in two or three key documents (i.e., a code of conduct, a complaint policy and a finance policy), detailed in separate policy documents for each subject, or drafted as a policy and procedure in one document (i.e., a complaint manual), each of these commitments remains largely the same across organisations.

Below are six policies that your organisation might find useful to have in place as the basis of their complaint management process.

Complaint management policy³

A complaint management policy guides staff when they establish the procedures for a complaint management system:

- Setting the culture of understanding why complaints are important (organisational values).
- Documenting the principles that guide how the complaint process will function.
- Confirming what is covered by the complaint management process (scope and definitions).
- Defining who can use the complaint management system.

Whistle-blower protection policy⁴

A whistle-blower protection policy (also known as a disclosure of malpractice in the workplace policy) encourages staff members to report concerns, most typically about a criminal offence, health and safety, damage to the environment, or miscarriage of justice. Reporting on SEAH can fall within an organisation’s whistle-blower protection policy. Whistle-blowers are often protected by law and cannot be treated unfairly or lose their job because they report these concerns.

³ CHS Alliance’s Members Complaints Mechanism Policy, 2020, <https://www.chsalliance.org/get-support/resource/chs-alliance-complaints-policy/>. The CHS Alliance encourages its members to have their own complaint mechanism in place. However, the CHS Alliance offers a complaint mechanism if its members have concerns, complaints, feedback on how this has been handled, or in cases where they don’t believe a member organisation has a complaint mechanism in place. For further details, see <https://www.chsalliance.org/complaints/>.

⁴ See the CHS Alliance Whistleblower Protection Guidance, 2022, for more information, recommendations, and details: <https://www.chsalliance.org/get-support/resource/whistleblower-protection-guidance/>.

Code of conduct⁵

A code of conduct is a formal document that details the behavioural standards that all individuals in, or associated with, an organisation are required to uphold. It reflects an organisation's vision, core values, and culture.

The code of conduct applies to staff, volunteers, and anyone associated with the organisation (such as suppliers), detailing the consequences of breaching required behaviours.

Safeguarding and protection from sexual exploitation, abuse, and sexual harassment policy

A statement of the organisation's zero tolerance for any form of sexual exploitation, abuse, or sexual harassment, emphasising that SEAH is contrary to the organisation's key values. The policy commits to developing a safeguarding culture among staff and partners.

Anti-fraud and anti-corruption policy

A policy against fraud and corruption contributes to organisational accountability and supports an organisational culture of ethical behaviour. By establishing an organisation's commitments to zero tolerance for fraud and corruption, an anti-fraud and anti-corruption policy helps minimise and manage risk.

Conflict of interest policy

This is a message or policy conveying the explicit requirement for staff and governance level individuals to avoid or declare conflicts of interest, because this is a major step to preventing corruption.

A conflict-of-interest policy protects an organisation's interests in situations where these may come into competition with an individual's interests, be they staff, management or governance/board level.

⁵ See the CHS Alliance Code of Conduct Toolkit, 2021, for more guidance on how to develop or update a code of conduct: <https://www.chsalliance.org/get-support/resource/code-of-conduct-toolkit/>

07

TYPES OF COMPLAINTS

To manage complaints effectively and consistently, it is crucial to understand and distinguish between the different types of complaints received, to ensure appropriate and efficient responses.

Complaints can be classified into:

Feedback: information that reflects on the results or effects of an activity or process. Feedback can be positive, negative, or neutral, and serves as a vital tool for continuous organisational learning and quality enhancement. Feedback provides insights for improvement, validation, or alteration, helping organisations adapt and refine their service and operations.



Non-sensitive complaints: legitimate concerns that do not encompass immediate threats or major legal or ethical repercussions. Examples might include concerns about service quality, minor operational inefficiencies, or aspects of an organisation's services that do not meet expectations. Such complaints are typically addressed through standard procedures, without the need for specialised intervention.



Sensitive complaints (non-SEAH): involve issues with potential legal, ethical, or safety ramifications. These complaints can stem from concerns about fraud, allegations against staff or volunteers for various misconducts, or matters that could negatively impact crisis-affected people. Handling these requires heightened confidentiality, urgency, and a particular set of procedures to ensure the welfare of all involved.



Sensitive complaints (SEAH)⁶ are those specific to allegations of sexual exploitation, abuse, or harassment by individuals affiliated with an organisation. These are of highest concern, especially when related to people in positions of trust, such as humanitarian workers. Addressing such complaints requires immediate attention, strict confidentiality, and a victim/survivor-centric approach, prioritising the safety and well-being of affected individuals.



Out of scope: feedback or complaints referring to issues that do not align with an organisation's remit or the specific process's objectives. Even though they might be valid observations or concerns, they are not directly actionable within the existing framework or department. Addressing these typically involves guiding the complainant to a more appropriate channel or offering clarification.



⁶For a specific SEAH definition, refer to the CHS PSEAH Implementation Quick Reference Handbook, p.2-3, <https://www.chsalliance.org/get-support/resource/pseah-implementation-quick-reference-handbook/>

7.1 KEY POINTS FOR MANAGING DIFFERENT TYPES OF COMPLAINTS

Organisations must have clear procedures that distinguish between and effectively address complaints that are non-sensitive and sensitive, including complaints of a sexual nature (SEAH).

The table below illustrates a summary of the key points to consider. This list is not exhaustive.

KEY STEPS: How to treat sensitive and non-sensitive complaints

PROCESS	NON-SENSITIVE COMPLAINT	SENSITIVE COMPLAINT (NON-SEAH)	SENSITIVE COMPLAINT (SEAH)
How the complaint is treated	<ul style="list-style-type: none"> The complainant is treated with respect and their grievance acknowledged. There may not be a need for additional protective measures or resources. 	<ul style="list-style-type: none"> The complainant is treated with respect and assured of highest confidentiality. Special measures are taken to ensure their safety and well-being. They are provided with immediate support and resources, such as counselling, if required. 	<ul style="list-style-type: none"> The complainant may be a victim/survivor of abuse and so is treated with highest sensitivity. Immediate protective and support measures are implemented. Confidentiality is of the highest priority
How the complaint is recorded and tracked	<ul style="list-style-type: none"> Recorded in the general complaint or feedback database. Standard tracking mechanisms in place. 	<ul style="list-style-type: none"> Recorded in a secure, restricted-access database. Detailed logs are maintained with limited access to protect confidentiality. 	<ul style="list-style-type: none"> Stored with the strictest confidentiality in a specialised, secure system. Tracking ensures the anonymity of the victim/survivor.
Who deals with the complaint and how it is channelled	<ul style="list-style-type: none"> Typically addressed by the project manager or a customer service or feedback team. May not require escalation unless unresolved at primary levels. 	<ul style="list-style-type: none"> Specialised personnel or teams, trained in handling sensitive issues, address the complaint. The complaint is often escalated to senior management or specialised departments. 	<ul style="list-style-type: none"> Managed by specially trained personnel familiar with SEAH issues. Involves senior management, and possibly external entities, from the outset.

PROCESS	NON-SENSITIVE COMPLAINT	SENSITIVE COMPLAINT (NON-SEAH)	SENSITIVE COMPLAINT (SEAH)
How the complaint is managed	<ul style="list-style-type: none"> • Managed using standard organisational procedures. • Typically resolved by the department related to the complaint. 	<ul style="list-style-type: none"> • Managed with a high degree of confidentiality, urgency, and care. • May require a multi-departmental approach, including legal and HR teams. 	<ul style="list-style-type: none"> • Managed with the utmost sensitivity and urgency. • Victim/survivor-centred approach is employed throughout. • External entities or oversight bodies may be involved.
How response, follow-up, and closing the loop takes place	<ul style="list-style-type: none"> • Standard response, follow-up, and resolution processes apply. 	<ul style="list-style-type: none"> • Regular updates may be provided to the complainant. • Special care is taken during follow-ups. 	<ul style="list-style-type: none"> • Response and follow-up prioritise the victim/survivor's safety and psychological well-being. • Closing the loop ensures the victim/survivor is informed, supported, and protected.

08

THE PROCESS: RECEIVING, CLASSIFYING, AND CHANNELLING COMPLAINTS

This section is divided into three parts, focusing on the effective management of receiving and acknowledging, classifying, and channelling complaints within an organisation, with a specific focus on sensitive complaints.

By following and adhering to a structured approach, organisations can navigate the complexities of managing complaints in a safe, fair, timely, and appropriate manner⁷, maintaining trust, confidentiality, and integrity throughout the process.

What does "safe" mean?

Ensuring that the complaint process protects the complainant and any other concerned parties from any form of retaliation, harm, or undue exposure. This includes maintaining confidentiality, protecting personal data, and providing security to involved parties if necessary.

What does "fair" mean?

Treating every complaint with impartiality, ensuring that no party is prejudiced or favoured during the process. This means that every stage of the process is conducted without bias, ensuring equal treatment and consistency.

What does "timely" mean?

Addressing and resolving complaints within a reasonable and established timeframe. Delays can increase anxieties and reduce trust in the process. A timely response shows the complainant that their concerns are taken seriously.

What does "appropriate" mean?

Ensuring that the methods, responses, and resolutions used in managing the complaint are suitable to the specific nature and gravity of the complaint. This might involve tailoring procedures based on the cultural, social, or age-specific sensitivities related to the complaint.

⁷ Core Humanitarian Standard (CHS), commitment 5, <https://corehumanitarianstandard.org/the-standard>

8.1 RECEIVING AND ACKNOWLEDGING A COMPLAINT

This section outlines the immediate steps to be taken on receiving a complaint. From acknowledging its receipt to ensuring confidentiality and outlining next steps, this phase sets the stage for how the rest of the complaint process will unfold. Additional concerns such as anonymous complaints and challenges of missing details are also addressed.



Receipt and immediate acknowledgment

As soon as a complaint is received, the focal point (trained person for receiving complaints) acknowledges receipt to the complainant, even if the complaint is unsubstantiated or incomplete. This will assure the person that their concerns are being taken seriously.



For complex or sensitive complaints, promptly acknowledge their receipt and seriousness.



Challenges and Solutions

Promptly acknowledging the complaint can be challenging, especially if there are missing details, or the complaint is received by someone who is not sure what to do with it, or for organisations with fewer resources.

Some possible solutions:

- Consider using [standardised response templates](#) ([add URL here](#)) for immediate acknowledgment, even in uncertain scenarios.
- Train staff on complaint management, together with designating specific complaint handlers.
- Promote clear communication channels so complaints are directed to the right place.
- Conduct regular reviews of the complaint process to ensure it remains effective and responsive.

Link to toolkit to be added once complete

Important to know



The perception of truth. When someone confides in you with a sensitive concern, whether it's about another organisation or personal abuse, recognise it as an act of trust. It's crucial to support the individual and validate their courage in sharing. Ensure the complaint is escalated and handled with the utmost care and urgency. The perception of truth is an important part of a victim/survivor-centred approach.

The complaint concerns another organisation.⁸ Where the complaint concerns another organisation, it is good practice to log this complaint internally and refer the complaint to the complaint handling team in that organisation, with informed consent from the alleged victim/survivor. The concerned organisation should then follow the steps set out in this guide and fully manage the complaint.

⁸Practice taken from the Inter Agency Standing Committee Sexual Exploitation and Abuse Referral Procedures_FINAL V6, September 2023, available soon on <https://psea.interagencystandingcommittee.org/>



Remind and ensure confidentiality

Emphasise the organisation's commitment to maintaining the confidentiality of the complaint process. This helps build trust, particularly if the complainant is worried about potential retaliation or exposure. Ensure that the details of the complaint and the identity of the complainant are kept confidential and only shared on a need-to-know basis and with informed consent.



Challenges and Solutions

Building trust through maintaining confidentiality may be difficult, particularly when the complainant fears retaliation.

Some possible solutions:

- Set clear confidentiality protocols and rigorously communicate them to all staff and those managing the process.
- Implement protective measures to shield the complainant's identity throughout the process.
- Foster trust with regular and transparent communication with the complainant about their complaint's status, without compromising confidential details.
- Allowing for complainants to give feedback on the process demonstrates a commitment to transparency and improvement.



Missing details

When the complaint is not anonymous, contact the complainant to ask for additional details or clarification, if safe to do so. If it is an anonymous complaint and there is a mechanism to communicate without compromising anonymity, use it to request more information.

When asking for more information, especially in sensitive situations, ensure that you are not pressuring the complainant. Phrase your requests in a way that makes clear you are looking to support the complainant and address the issue fully.



Important to know

The identity of the impacted individual or the complainant is unknown: when the alleged victim/survivor's identity is unknown (i.e. the complaint is reported by a third party who does not know the identity of the victim), or the complaint is made anonymously, but the alleged perpetrator and their organisation is known, the complaint should be followed up in the same way as any other sensitive complaint ([see Section 7.1](#) for steps to follow) and managed by the complaint handling team.



Be transparent about next steps and process

Briefly explain the steps the organisation will take in response to the complaint. This provides clarity and sets expectations about what comes next. Do not guarantee outcomes or specific actions, especially at this early stage.



Challenges and Solutions

Clearly explaining what will happen next without making promises can be tricky but remains crucial for setting realistic expectations.

Some possible solutions:

- Develop guidance that outlines the general complaint handling process – be transparent about the typical procedure while emphasising that each case’s outcome may vary.
- Train staff to avoid speculating on outcomes and instead focus on communicating the process consistently.
- Regularly update the complainant, even if just to indicate ongoing work.
- Open channels for feedback and questions from complainants – this can further clarify the process and manage expectations.



Documentation




Record all details of the complaint accurately. This includes dates, times, nature of the complaint, individuals involved, and any other relevant details. Maintain a clear record of any follow-ups, and any additional information received. Ensure that access to that documentation remains confidential and strictly on a need-to-know basis. Establish organisational rules on how long these records should be kept, in accordance with applicable data protection laws in your country.

8.2 CLASSIFYING A COMPLAINT

This section provides a simple approach for categorising a complaint, based on factors such as the nature, type, severity, and source.

This classification is crucial for shaping the subsequent action plan, maintaining a secure record for future reference, and preserving the confidentiality and trust of those involved.

KEY STEPS: Classifying a complaint



STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
 <p>Nature of the complaint</p>	<p>➔ Determine the fundamental nature of the complaint.</p> <p>Is it related to harassment, sexual abuse, discrimination, fraud, or another serious matter?</p>	<ul style="list-style-type: none"> • A single complaint can touch on several issues. • People might see issues such as harassment differently, and complainants might not be clear due to worries about backlash or privacy. • Staff might not have the know-how to spot nuances, and without a good recording method, essential complaint details could get lost or misunderstood.
 <p>Type of complaint</p>	<p>➔ Determine the type of complaint.</p> <p>Is it <i>feedback</i>, <i>non-sensitive complaint</i>, <i>sensitive complaint (non-SEAH)</i>, <i>sensitive complaint (SEAH)</i> or <i>out of scope</i>? See Section 7 to help you decide.</p>	<ul style="list-style-type: none"> • What's sensitive in one culture or to one person might not be to another, leading to misunderstandings or misjudgements. • Lack of full information, or the complainant holding back, can mask the real sensitivity. Emotional reactions can also vary widely, making classification challenging.
 <p>Organisational jurisdiction</p>	<p>➔ Assess whether the complaint falls under the organisation's remit.</p> <p>Is it directly related to an action, policy, individual, or event within the organisation? If it is outside the organisation's scope or better addressed by another entity, it might need redirection or collaboration with external bodies.</p> <p>Section 7 provides more detail for the term 'out of scope'.</p>	<ul style="list-style-type: none"> • If an organisation's policy is too vague or complex, it may be hard to determine if the organisation should handle the complaint. • With multiple offices or when external parties are involved, it may be difficult to work out who should oversee the complaint. • Some issues might have happened under old policy or leaders, making it difficult to decide who is responsible.

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
<p>Severity of the complaint</p>	<ul style="list-style-type: none"> ➔ Work out the potential impact. • High: issues that might lead to severe legal, reputational, or safety consequences. • Medium or low: determine if the matter, despite being sensitive, does not carry immediate high-risk implications. 	<ul style="list-style-type: none"> • Without clear guidance, people might see the impact of a complaint differently, leading to uneven responses. • Complainants might not show the real depth of their hurt, or some impacts might not show up right away. • While some impacts can be quantified, others, such as damage to reputation or emotional harm, are harder to measure.
<p>Source of the complaint</p>	<ul style="list-style-type: none"> • Internal: from staff or other organisational representatives. • External: from community members, partners, or others outside the organisation. 	<ul style="list-style-type: none"> • Some systems might let people complain without naming themselves (anonymity), but if they provide their identity, complainants might hold back details due to worries about retaliation. • The person speaking up might not be the one directly affected, making it harder to figure out the real source. • Many people might report similar issues; or complaints might come through various informal channels, causing confusion about the original source.
<p>Time sensitivity (urgency)</p>	<ul style="list-style-type: none"> • Immediate: requires prompt attention due to the need to prevent potential negative outcomes and harm, especially for concerned individuals (victim/survivor). • Urgent: Needs swift action because of a time-sensitive nature or the importance of the matter at hand. • Ordinary: standard or typical, without any special or distinguishing features. • Short-term: pertains to actions, goals, or tasks that have a relatively brief duration and should be addressed or completed within a pre-defined timeframe. 	<ul style="list-style-type: none"> • Without clear guidance, people might rate urgency differently, causing mixed priorities. • A flood of complaints can slow things down, and urgent complaints may get overlooked. • Some complaints can escalate if not tackled, and external factors such as media spotlight can push issues up the priority ladder unexpectedly.

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
	<ul style="list-style-type: none"> • Simple: can be resolved or addressed with minimal steps. • Complex: requires a multi-faceted process or multiple parties' input. 	<ul style="list-style-type: none"> • Early complaint descriptions might miss details, making it hard to judge how deep or serious the issue might be. • What seems like one issue can lead to bigger problems; if the organisation hasn't seen the complexity of the complaint on time, it might be challenging to figure out next steps. • When many people or groups are involved, or there are potential legal or cultural issues, even straightforward complaints can quickly get complicated, especially considering the potential impact on individuals and the organisation's reputation and finances. • Complex complaints may require some additional support or resources from within or outside an organisation.
	<ul style="list-style-type: none"> ➔ Determine if there are potential legal or regulatory consequences. 	<ul style="list-style-type: none"> • Organisations operating across multiple regions face the complex task of determining which jurisdiction's rules apply, especially when a single complaint implicates multiple regulatory areas. • Ambiguous regulations, coupled with the potential absence of clear organisational policy or expertise, can lead to misinterpretation, risking significant penalties.

Complexity of the complaint

Regulatory implications

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
	<p> Determine if the complaint may involve a crime. Talk to legal experts to understand the seriousness and what the implications may be.</p> <ul style="list-style-type: none"> • Assess risks involved in reporting to the police/law enforcement. If the risk of harm is high, consider mitigation measures and providing additional support to the victim/survivor. Communicate your decision in advance to everyone involved. • Report potential criminal behaviour to law enforcement. Give them all the information you have, to help with their investigation. • Keep all possible evidence such as documents or electronic records safe and untouched. • Find out if your organisation can investigate the matter internally without getting in the way of the official police investigation. 	<ul style="list-style-type: none"> • Protecting the safety and wellbeing of those involved in the allegations may be challenging, especially if the accused is a part of the organisation. • Concerns about damage to the organisation’s reputation and potential legal consequences may hinder timely reporting to law enforcement. • Conducting an internal investigation without impeding the official police inquiry demands delicate handling and clear communication.
	<p> Once classified, log the classification details securely.</p> <p>This record should include:</p> <ul style="list-style-type: none"> • Date of receipt and classification. • Nature and summary of the complaint (assign severity, source, and complexity levels). • Any additional notes or observations (name of the individual or team responsible for classification). • Ensure that this log is stored securely, maintaining confidentiality, especially for highly sensitive complaints. 	<ul style="list-style-type: none"> • Keeping the complaint storage system safe is vital; any flaw in the system or slip up by an operator could expose personal details. • Information logged in a system may accidentally hint at who’s involved in a complaint. • In smaller organisations, people often have many roles, making it difficult to keep complaints confidential when everyone knows each other well.

Criminal implications

Securely logging the classification






Given the sensitive nature of some complaints, it is crucial that classification is followed by quick action – while ensuring the utmost discretion, respect for the complainant, and compliance with relevant organisational policies and legal regulations (including applicable data protection laws).

8.3 CHANNELLING A COMPLAINT

Channelling a complaint correctly is crucial for ensuring the safety of those involved, maintaining organisational integrity, and fostering trust. It not only prevents further harm to individuals and risk to the process, but also safeguards the reputation and values of the organisation.

By following these steps and always keeping the complainant’s well-being at the forefront, organisations can effectively address sensitive complaints with the care and attention they warrant.

KEY STEPS: Channelling a complaint

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
 <p>Determination of policy</p>	<ul style="list-style-type: none"> ➔ Identify the most relevant organisational policy that corresponds to the complaint. This could range from a code of conduct to harassment, fraud, or grievance policies. ➔ Understand the specific process that needs to be followed for highly sensitive complaints, such as those related to sexual exploitation, abuse, or harassment. 	<ul style="list-style-type: none"> • Organisations can have various policies, some possibly outdated, making it difficult to identify the most relevant one for the complaint. • Vague policy wording and the presence of both internal and external policy or regulation can cause confusion in determining the best course of action.
 <p>Determination of legal jurisdiction</p>	<ul style="list-style-type: none"> ➔ Establish where the alleged complaint took place and consider the laws of that jurisdiction. ➔ Understand the contractual agreement of the alleged perpetrator(s) and the jurisdiction that governs it. If multiple jurisdictions apply, it is crucial to seek legal counsel. 	<ul style="list-style-type: none"> • For entities in multiple regions, determining the applicable jurisdiction can be challenging, especially when incidents span different locations or involve online activities. • Jurisdictional laws can be open to interpretation, and discrepancies between regions can complicate the handling of complaints.
 <p>Identify roles to manage the complaint</p>	<ul style="list-style-type: none"> ➔ Delegate and clearly specify roles and responsibilities for handling the complaint. This could be done by the focal point or a case lead. <p>This can help in efficient and transparent management of the issue.</p>	<ul style="list-style-type: none"> • Lack of clear role definitions or responsibilities can lead to confusion over who should handle the complaint and potential conflict of interest due to personal relationships, hierarchical dynamics, or vested interests. • Not all roles or individuals might have the required skillset or training to handle sensitive complaints, leading to potential mishandling or escalation. • In smaller organisations, there might be limited personnel with the expertise to manage sensitive complaints. However, to the extent possible, try to avoid potential conflict of interests.

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
<p>Identify systems for recording the complaint's journey</p>	<ul style="list-style-type: none"> ➔ Determine which systems will be used to track the progress and resolution of the complaint, ensuring that all stages of the process are carefully recorded. 	<ul style="list-style-type: none"> • Ensuring that the system can maintain the confidentiality of the complaint, with appropriate access controls, encryption, and security measures, is paramount. • The system should be able to provide a comprehensive log of all actions and updates related to the complaint. • With all complaints, there might be legal or regulatory requirements on how long data should be retained or when it should be deleted.
<p>Risk assessment</p>	<ul style="list-style-type: none"> ➔ Identify all parties connected to the complaint, from the main individuals involved to any potential witnesses. ➔ Assess if any parties are at immediate risk, ensuring they receive the necessary support and advice. Take steps to lower these risks, such as getting professional support for the complainant or moving someone who may be in danger. ➔ Guarantee the safe and confidential management of personal data and case information. ➔ Continuously evaluate the risks associated with the complaint management process and make necessary adjustments. 	<ul style="list-style-type: none"> • Proper risk assessment requires expertise and resources, which might be scarce in some organisations, affecting the depth and impartiality of the analysis. • Ensuring a transparent process while safeguarding the confidentiality and privacy of those involved can be a delicate task. • Personal relationships and organisational structures can introduce biases, potentially affecting an objective evaluation of risks. • As new details emerge, the risk profile can evolve, requiring continuous reassessment, coupled with the unpredictability of all possible outcomes.
<p>Initial interview (optional)</p>	<ul style="list-style-type: none"> ➔ Depending on the sensitivity of the complaint and the policy being used, interview the complainant to delve deeper into the issue before it is determined whether an investigation is needed. ➔ Conduct any interview with utmost empathy, especially in alleged SEAH cases. 	<ul style="list-style-type: none"> • The complainant's distress can affect accurate recall, and discussing the incident can be re-traumatising, necessitating a sensitive approach. • Building trust is essential, especially if there's a power differential between the complainant and the alleged perpetrator. Ensuring confidentiality is crucial to obtaining complete information. • The interviewer must remain unbiased and supportive, and cultural or linguistic nuances can pose challenges, making proper training crucial.

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
<p>Decision on investigation</p>	<p>➔ Determine if a formal investigation is required. If not, provide the rationale to the complainant. If an investigation is initiated, keep all concerned parties informed. See also Section 8.4 below.</p>	<ul style="list-style-type: none"> • Investigations demand significant resources, including time, personnel, and occasionally external expertise. • The investigation process can be bound by existing laws and regulations, while also needing to navigate the emotional ramifications for all involved. • Balancing transparency with privacy is challenging, and communicating decisions, especially if no investigation is pursued, can be delicate and has the potential to erode trust.
STEPS	PREVENTATIVE ACTIONS TO FOLLOW	
<p>Timeframes for response and investigations</p>	<ul style="list-style-type: none"> ➔ Establish clear timelines for the process and responding to the complainant, adapting these according to the specific case. ➔ Agree a communication plan with the complainant and ensure any changes are communicated in advance and acted on. It's important to quickly inform both the complainant and other concerned parties and stakeholders how you have addressed concerns, as it promotes respect and transparency. 	
<p>Closing the loop</p>	<ul style="list-style-type: none"> ➔ As part of the agreed communication plan, keep all parties informed about the complaint's status. ➔ Ensure any changes to this plan are communicated in advance and acted upon. ➔ Ask for feedback from the complainant to understand whether the issue has been resolved satisfactorily. ➔ If the complainant is not satisfied with the resolution, ensure they are aware of their right to appeal, especially in SEAH cases. 	
<p>Appeals process for the complainant</p>	<ul style="list-style-type: none"> ➔ Establish a clear and fair process for complainants to appeal decisions. ➔ Ensure that if a complaint was made in good faith, there is no sanction or retaliation against the complainant. 	
<p>Documentation</p>	<ul style="list-style-type: none"> ➔ Document all stages, decisions, and actions in the complaint management process, including any informal or casual feedback. ➔ Control access to this documentation to preserve confidentiality. 	
<p>Challenges and lessons learned</p>	<ul style="list-style-type: none"> ➔ Following resolution of the process, reflect on the challenges faced during the complaint handling process and document lessons learned to improve future procedures. ➔ Ask for feedback from the complainant to understand whether the issue has been resolved satisfactorily. If an investigation has taken place, this step could take place post-investigation (see Section 8.6 below). 	

8.4 SENSITIVE COMPLAINTS AND INVESTIGATION

Sensitive complaints, by their very nature, hold immense significance for both the complainant and the organisation. The act of raising such complaints can be emotionally charged and have profound implications. Addressing them promptly and correctly isn't just a matter of protocol; it's about safeguarding the well-being of staff, victims/survivors, and the integrity of the organisation.

In this light, sensitive complaints warrant investigation when:

1. The content of the complaint suggests there might have been a violation of organisational policy or rules, or even legal regulations. Ignoring these signs can place individuals at risk, jeopardise the organisation's reputation, and may even lead to legal repercussions.
2. The complaint outlines a distinct dynamic between an alleged victim/survivor and a perpetrator. Understanding and addressing this dynamic is central to maintaining a safe and respectful organisational environment, and investigating might then become crucial to ensuring justice and fairness.
3. The initial complaint is ambiguous or lacks conclusive evidence. Gathering additional evidence can help determine the accuracy of the claims and ensure decisions are made based on a complete understanding of the situation.

A successful investigation often hinges on the clarity and completeness of the initial information provided. If the complaint offers detailed insights into the event or subject at hand, it provides a strong foundation for an effective probe, ensuring that investigators have a clear direction and focus.

8.5 THE IMPORTANCE OF A SPECIFIC APPROACH FOR SEAH COMPLAINTS

SEAH complaints are distinct from other sensitive complaints not of a sexual nature (such as fraud or corruption), due to the personal, direct, and often traumatic nature of an SEAH incident for the victim.

SEAH is a direct violation of an individual's rights, dignity, and body, which involves personal trauma and can have lasting physical, emotional, and psychological impacts. Victims/survivors might face retaliation from perpetrators or be excluded by their community, further increasing their vulnerability; they may also be more susceptible to further exploitation and abuse, mental health issues, and societal stigma.

The harm inflicted on the individual mandates a more holistic, adaptable, and compassionate approach.

Consequently, complaints of SEAH also require a specific approach, attention, and actions, setting them apart from any other sensitive issues.

Organisations committed to addressing complaints about SEAH should adhere to and integrate the following critical principles and good practices, as this can ensure that complaints are managed with even more sensitivity, fairness, and effectiveness.

Zero tolerance for inaction: organisations must remain steadfast in their commitment to addressing all SEAH complaints promptly. The aid sector, especially donors, no longer tolerate inaction against such complaints.

Contextual response:⁹ all country-level offices should take responsibility for managing a complaint, even if it is against another entity, adhering to established referral guidelines and procedures.

Victim/survivor-centred approach: a victim/survivor-centred approach prioritises the needs, rights, wishes, safety, and well-being of the victim/survivor of SEAH at all stages and in all matters and procedures, from the violation's occurrence to the final redress and compensation.¹⁰ It is therefore essential that victims/survivors:

- Feel safe, heard, and respected.
- Are guaranteed security and safety, considering their unique familial, cultural, and social contexts.
- Are not subjected to further harm by the organisation or exposed to risks such as stigmatisation, discrimination, or retaliation.
- Have their confidentiality respected and identity protected, understanding all mandatory reporting procedures and implications of their choices.
- Are provided with comprehensive support, encompassing medical care, psychological counselling, and legal guidance. It's important to recognise the emotional and psychological dimensions of SEAH, necessitating regular reassessments to cater to the evolving needs and states of the victims/survivors.

Child victims/survivors: children require special attention. It's imperative to:

- Adhere to the Convention on the Rights of the Child, prioritising the child's best interests.
- Respect their right to voice their views, considering their age and maturity.
- Consult with experts understanding the unique needs of child survivors when designing referral pathways.
- Obtain their informed assent, considering their evolving capacity.

Informed consent: keep the victim/survivor updated about any actions that might be taken based on the information they provide. They should be kept aware of their choices, and their consent must be obtained before using their information, upholding their right to opt-out at any stage.

Trained personnel on SEAH complaint management: SEAH complaints can come from various sources and be received by anyone. Organisations have a duty to train their staff in safe disclosure, make them understand institutional procedures for immediate SEAH reporting, and increase the number of staff trained to receive sensitive complaints.

⁹ A summary of the principles for SEAH response, taken from the Inter Agency Standing Committee's Sexual Exploitation and Abuse Referrals Procedures v6_FINAL, 2023 – available soon on the IASC website dedicated to SEAH, <https://psea.interagencystandingcommittee.org/>

¹⁰ CHS Alliance's foundational paper, Victim/Survivor-Centred Approach to Protection from Sexual Exploitation, Abuse and Harassment in the Aid Sector, 2023, p.12-13, <https://www.chsalliance.org/get-support/resource/victim-survivor-centred-approach-pseah/>

8.6 MANAGING A SENSITIVE COMPLAINT (INCLUDING SEAH) POST-INVESTIGATION

By effectively managing complaints post-investigation, organisations not only address the immediate concerns but also improve the safety, overall responsiveness, transparency, and credibility of the complaint mechanism.

KEY STEPS: Managing a sensitive complaint post-investigation

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
<p>Actionable outcomes from the investigation</p>	<p>➔ Upon completion of the investigation, take the following steps. These can include disciplinary measures or changes to practice within the organisation.</p> <ul style="list-style-type: none"> • If the investigation finds evidence of misconduct, apply the appropriate disciplinary measures outlined in organisational policy. • Address any operational or procedural gaps discovered during the investigation. • Utilise findings to inform training and improve existing guidelines. 	<ul style="list-style-type: none"> • Maintaining the privacy of all parties involved in a sensitive disciplinary matter is not always easy. • Handling the strong emotions and potential biases associated with sensitive issues can complicate the disciplinary process. • Properly addressing operational gaps and updating training can require substantial resources, both in terms of time and finances, which may be limited.
	<p>➔ Keep involved parties informed about the investigation's progress and findings, ensuring clarity and seeking their understanding.</p> <p>➔ Ask for feedback from the complainant to understand whether the issue has been resolved satisfactorily.</p> <p>➔ Share the results from the investigation, actions implemented, and potential preventative strategies with concerned stakeholders, but pay attention to maintaining confidentiality and respecting the privacy of individuals.</p>	<ul style="list-style-type: none"> • Striking the right balance between keeping involved parties informed while maintaining the privacy of sensitive information might be challenging. • Aligning the perspectives of the complainant, stakeholders, and the organisation on what constitutes a satisfactory resolution might prove difficult.

Actionable outcomes from the investigation

Communication and feedback loop

Reporting obligations and transparency

Sharing personal data and privacy

Organisational learning from complaints

STEPS	ACTIONS TO FOLLOW	POTENTIAL CHALLENGES
	<ul style="list-style-type: none"> ➔ Regularly update key internal stakeholders, such as the Board, about the complaint’s status and findings. ➔ In line with organisational commitments and regulations, share non-sensitive findings with external entities such as charity regulators, donors, and other pertinent bodies. ➔ Prioritise transparency when sharing SEAH cases and consider using the Inter-agency Misconduct Disclosure Scheme.¹¹ ➔ Identify critical reporting moments for SEAH and other sensitive matters, focusing on the safety and well-being of affected individuals. 	<ul style="list-style-type: none"> • Navigating the different reporting requirements for internal stakeholders and external entities can lead to potential oversights or miscommunications. • Ensuring that the details of SEAH and other sensitive cases are shared with transparency, while respecting confidentiality and anonymity – and safeguarding the dignity and privacy of affected individuals – is crucial, despite almost certain difficulties in implementation.
	<ul style="list-style-type: none"> ➔ Carefully evaluate the potential benefits and risks of involving national or international authorities, always prioritising the safety of those involved and the integrity of the investigation. ➔ When sharing personal information becomes necessary, make sure to follow data protection norms, privacy regulations, and internal protocols. 	<ul style="list-style-type: none"> • Determining when and how to involve national or international authorities can likely result in legal and procedural intricacies. • Ensuring the complete protection of personal data during transfers or disclosures, especially in a varied regulatory landscape, can pose potential security and compliance challenges.
	<ul style="list-style-type: none"> ➔ Address pressing concerns about the complaints process immediately. For example, lapses or breaches of confidentiality should be addressed without delay. ➔ Gather broader insights that can benefit the organisation. Such insights could lead to refining the way complaints are taken, enhancing training sessions, or introducing better practices. ➔ Seek feedback from those who raised concerns. Understand their perspective on the process and consider their suggestions for a more effective and safe approach. 	<ul style="list-style-type: none"> • Swiftly addressing concerns can sometimes lead to hurried solutions that might not be comprehensive or long-lasting. • Navigating and integrating varied feedback from different stakeholders into cohesive improvements can be complex and sometimes conflicting.

¹¹For more information on the Misconduct Disclosure Scheme, see: <https://misconduct-disclosure-scheme.org> The Scheme facilitates sharing of misconduct data between employers. It aims at stopping perpetrators of sexual misconduct moving between organisations. In 2023, it is implemented by over 220 organisations. Up to date, more than 86,000 checks have been conducted, resulting in 230 applications being rejected at recruitment stage.

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ROLES AND RESPONSIBILITIES IN THE COMPLAINT PROCESS

For effective complaint resolution in an organisation, roles must be clearly defined. The complaint management process is a team effort, with various roles operating at the same time. Depending on the organisation's size and nature, responsibilities can range from receiving complaints to training and communication.

Proper training for these roles is vital, ensuring swift and efficient handling of issues while minimising confusion. Examples of roles and responsibilities an organisation could use in the complaint process are outlined in below.

WHO DOES WHAT? Defining roles and responsibilities

ROLE	RESPONSIBILITIES
Complaints focal point, officer, or coordinator	<ul style="list-style-type: none"> <input type="radio"/> Receive and log incoming complaints. <input type="radio"/> Acknowledge receipt of the complaint. <input type="radio"/> Ensure complaints are directed to the appropriate department or personnel. <input type="radio"/> Maintain the confidentiality and integrity of the complaint data.
Case manager	<ul style="list-style-type: none"> <input type="radio"/> Oversee the complaint from receipt to resolution. <input type="radio"/> Conduct and monitor a risk assessment for the process, including risk mitigations for the safety of those impacted by the complaint. <input type="radio"/> Ensure timely and appropriate responses to the complainant. <input type="radio"/> Coordinate between different roles and teams involved in the process.
Senior management or decision-maker	<ul style="list-style-type: none"> <input type="radio"/> Make decisions on complex or high-risk complaints. <input type="radio"/> Ensure organisational principles, policies and procedures are upheld. <input type="radio"/> Conduct risk assessments and put in place mitigation measures for those involved or impacted by the complaint and for the complaint process. <input type="radio"/> Be a dedicated support to case managers if assigned to do so. <input type="radio"/> Review investigation findings and recommendations.

ROLE	RESPONSIBILITIES
Support and welfare team	<ul style="list-style-type: none"> <input type="radio"/> Provide counselling or support services to affected parties, especially in sensitive or SEAH complaints. <input type="radio"/> Offer guidance on additional support services, such as legal or medical assistance.
Human resources team	<ul style="list-style-type: none"> <input type="radio"/> Guide the case management team on adhering to relevant policy and practice. <input type="radio"/> Advise case managers on how to handle difficult cases. <input type="radio"/> Be dedicated support to case managers and involved parties if assigned to do so.
Legal counsel	<ul style="list-style-type: none"> <input type="radio"/> Guide the organisation on adhering to relevant laws and regulations. <input type="radio"/> Provide legal advice during investigations, especially when potential legal implications are involved.
Quality assurance or review team	<ul style="list-style-type: none"> <input type="radio"/> Monitor the effectiveness of the complaint handling process. <input type="radio"/> Propose improvements or changes to enhance the process.
Data protection officer	<ul style="list-style-type: none"> <input type="radio"/> Ensure that personal data related to complaints is handled according to data protection laws. <input type="radio"/> Advise on data storage, access, and deletion procedures.
Communications team or public relations	<ul style="list-style-type: none"> <input type="radio"/> Handle external communications related to complaints, especially if they have public or media attention. <input type="radio"/> Draft statements or responses that maintain the organisation's reputation.
Training and development team	<ul style="list-style-type: none"> <input type="radio"/> Provide regular training on complaint handling procedures. <input type="radio"/> Ensure all staff are aware of the importance of proper complaint management.
Feedback coordinator	<ul style="list-style-type: none"> <input type="radio"/> Process feedback that is not a complaint but can help in improving services or operations. <input type="radio"/> Coordinate with relevant teams to implement changes based on feedback.
Investigation team or investigator	<ul style="list-style-type: none"> <input type="radio"/> Conduct detailed investigations into valid complaints. <input type="radio"/> Gather evidence, interview involved parties, and ensure a fair and unbiased investigation process. <input type="radio"/> Document findings and recommend appropriate action.
All staff	<ul style="list-style-type: none"> <input type="radio"/> Uphold the principles of the organisation's complaints process. <input type="radio"/> Accept complaints in person if approached and respond or escalate appropriately.

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MANAGING COMPLAINTS IN DIFFERENT-SIZED ORGANISATIONS

Managing complaints in different-sized organisations can lead to varied challenges.

In organisations with limited resources, there may not always be a specialised team dedicated solely to managing these concerns, which can result in staff members from various departments or even volunteers shouldering the responsibility. Such overlaps can obscure clear lines of accountability and professionalism, especially when clear distinctions between roles – such as staff, volunteers, crisis-affected people, and donors – become blurred.

Organisations closely integrated within their communities, regardless of size, can offer a profound understanding of local dynamics. This intimacy, while valuable, can sometimes challenge impartiality, particularly if a complaint is about a prominent or influential community figure.

Where larger organisations have the capacity to develop and maintain formalised processes, their smaller counterparts might operate on more adaptive measures. This lack of strict protocols can be both a strength, providing flexibility, and a vulnerability, leading to potential oversights when addressing delicate issues.

Regardless of the organisation's size, maintaining **impartiality** is crucial. With a more limited staff and stakeholder pool in smaller entities, avoiding biases and conflicts of interest can be more challenging. On the other hand, in larger organisations, the challenge might lie in navigating through bureaucratic layers.

The foundational principles of handling complaints – such as **transparency, fairness, confidentiality, and respect for the wronged person** – remain consistent across all sizes of organisations.

By acknowledging their specific context, being proactive in staff training, and seeking external expertise, when necessary, organisations can navigate their unique challenges. The goal is to balance adaptability with the unwavering commitment to a **just and fair** complaint resolution process.

If you do not have all the answers, do not hesitate to seek advice from a larger or more experienced partner organisation or network.

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CONCLUSION

All organisations working in the humanitarian and development sector have a responsibility to ensure a secure and accountable environment for their staff, partners, and – perhaps most importantly – the crisis-affected people they work for.

- Complaints should be acknowledged and managed in a safe, fair, timely, and appropriate manner, as detailed in CHS Commitment 5.
- Uncompromised procedures and core principles including confidentiality, accountability, safety, and well-being of all individuals should be respected and implemented during the entire complaint management process.
- Every complaint should be handled and managed with the seriousness and sensitivity it requires, ensuring that each step, from receipt to post-investigation, is dealt with consideration and due care.

Following and adhering to the principles, structures, and processes laid out in this guide will help any organisation build a solid foundation for a comprehensive and transparent complaint management system. Such a system will not only build a culture of trust, safety, and respect, but will also enhance the overall effectiveness and reputation of the organisation, making it an inclusive and supportive environment for all.

12

GLOSSARY OF TERMS¹²

1. **Child protection:** preventing and responding to violence, exploitation, and abuse against children – including (but not limited to) commercial sexual exploitation, trafficking, child labour and harmful traditional practices.
2. **Complainant:** the person making the complaint, including the alleged victim/survivor of sexual exploitation, abuse, or harassment, or another person who becomes aware of the wrongdoing.
3. **Complaint mechanism or procedure:** processes that allow individuals to report concerns such as breaches of organisational policies or codes of conduct.
4. **Complaint:** specific grievance of anyone who has been negatively affected by an organisation or individual's action or who believes that an organisation or an individual has failed to meet a stated commitment.
5. **Feedback mechanism:** a formal system established and used to allow and enable recipients of humanitarian action (and in some cases, other crisis-affected people) 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.
6. **Focal point:** a person or team designated and trained to receive complaints and support the complaints process.
7. **Investigation:** an internal administrative procedure, in which an organisation attempts to establish whether there has been a breach of organisational policy by a staff member or members.
8. **Referral pathway:** the various support and referral services available to individuals impacted by a sensitive complaint e.g., victims/survivors of SEAH.
9. **Safeguarding:** the responsibility of organisations to make sure their staff, operations, and programmes do no harm to at-risk children and adults, nor expose them to abuse or exploitation. This term covers physical, emotional, and sexual harassment, exploitation and abuse by staff and associated personnel, as well as safeguarding risks caused by programme design and implementation. Many organisations now also use this term to cover harm caused to staff in the workplace.
10. **Sexual abuse:** an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
11. **Sexual exploitation:** any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another.
12. **Sexual harassment:** a continuum of unacceptable and unwelcome behaviours and practices of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for sexual favours and sexual, verbal, or physical conduct or gestures, that are or might reasonably be perceived as offensive or humiliating. Sexual harassment has widely been understood to relate to the workplace but is also included in the spectrum of behaviours that are not acceptable conduct by staff, be it in the workplace or with crisis-affected people.
13. **Victim or survivor:** the person who is, or has been, sexually exploited, abused, or harassed. The term “survivor” implies strength, resilience, and the capacity to survive. The term “victim” has protective implications, as it implies the victim of an injustice which we should seek to redress. Therefore, this resource uses both terms. People who have experienced SEAH may choose different terms to describe their experience.
14. **Victim/survivor-centred approach:** an approach in which the victim/survivor's wishes, safety, and well-being remain a priority in all matters and procedures.

¹² Most definitions are taken from the CHS Alliance: PSEAH Implementation Quick Reference Handbook, 2020, <https://www.chsalliance.org/get-support/resource/pseah-implementation-quick-reference-handbook/>. The term for “feedback mechanisms” has been taken from the Core Humanitarian Standard, CHS Guidance Notes and Indicators, <https://www.chsalliance.org/get-support/resource/chs-guidance-notes-and-indicators/> and <https://corehumanitarianstandard.org/>



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