



Refugee 4 Refugees Complaints and Feedback Mechanism

Introduction

Refugee 4 Refugees (R4R) aims to be a transparent and result-oriented organisation accountable for its actions.

While receiving a complaint or negative feedback can be an unwelcome experience for the alleged staff, it is essentially important for R4R and its staff because it helps initiate appropriate actions and protect those who wish to raise a complaint, improving our accountability and the quality of our work.

The purpose of a complaints and feedback mechanism is to provide a safe, fair and consistent means of addressing concerns about the following;

- Breaches of R4R's policies, including our [Code of Conduct](#)
- Operating procedures by R4R's staff, and volunteers.

R4R welcomes feedback from any beneficiaries and all stakeholders including other NGOs, official counterparts etc. Anyone can make a complaint or provide feedback to R4R and complaints channels are shared widely through a range of platforms to make the process accessible to different types of individuals.

Complaints Feedback Mechanism (CFM) Principles:

Right to Complain: R4R will take all complaints seriously and treat all complainants with respect.

Timely Response: Complaints will be fully investigated and responded to in a timely manner. R4R will keep complainants informed of their progress.

Open and Transparent: R4R will make sure making a complaint is an accessible and easy process.

Fair: Each complaint will be addressed in an equitable, objective and unbiased manner through R4R's CFM process.

Privacy: R4R will limit the circulation of the specific details of the complainant, only revealing to those who need to know in order for a proper investigation to be conducted.

Feedback: Complainants are encouraged to provide feedback on R4R's response and will be informed of the process for doing this. Feedback provides an important and constructive learning opportunity for R4R.

Confidentiality: Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. Third parties will only be included in the resolution of a confidential complaint if the law requires it and with the agreement of the complainant.

Accessibility: We will make all communication as easy as possible.

Standard Operating Procedures

R4R's complaints and feedback mechanism is active throughout R4R's work in Greece and consists of;

- Complaints channels and how complaints can be made
- Complaints management and how follow up is conducted

a) Complaints Mechanism Focal Point

A Board Member who is located outside of R4R operational procedures is the focal point for the Complaints and Feedback Mechanism. The focal point is responsible for;

1. Complaints hotline management
2. Complaints email management
3. Complaints form management
4. Complaints processing and overall process management
5. Complaints database management and confidentiality
6. Staff training
7. Generation of FAQ documents to properly equip staff
8. Complaint channel publicity
9. Chair of Complaints Handling Committee

b) Complaints Channels

There are several active complaints channels, over all of which the complaints focal point is responsible;

1. Email; safeguarding@refugee4refugees.gr
2. [Online complaints form](#)
3. Verbal complaint to an R4R staff member. Each staff member is trained to;
 - a. Gather the necessary information
 - b. Record the necessary information through the [online complaints form](#)
 - c. Confidentiality when dealing with complaints
 - d. Referral procedures

Information on the complaints channels that exist and how to make use of them are made public and in a range of languages. The information is present;

- R4R's website
- In the email signature of all staff members
- On R4R's social media pages
- Signboards are present at R4R operational locations

Due to resource limitations, only complaints in English can be accepted through the complaints hotline. However, email and online complaints can be accepted in different languages and will be reviewed and responded to either with the support of online translation tools, such as google translate.

R4R can only accept anonymous complaints through a third person intermediary with whom we can follow up. We strongly encourage individuals to disclose their identity to ensure the complaint can be addressed properly. Though we do understand that, sometimes, people cannot speak out because of special circumstances, and may wish to make a complaint without revealing their identity, we must be clear that anonymous complaints may be difficult or impossible to deal with and, thus, we can only accept complaints like these through a third person intermediary.

c) Information collected;

Regardless of the complaints channel used, the following information will be collected. None of the below fields are mandatory, but the complainant will have the opportunity to provide the below information voluntarily

- Full Name
- Location
- Contact number/ contact email
- Type of complaint (feedback, non-sensitive, sensitive (see info on types below)
- What happened / what's the issue
- Where did it happen
- When did it happen
- Who is involved – name and contact details of accused person(s)

Other information/evidence/information on witnesses and willingness to make formal statements

d) Resolving Complaints

At each stage of our Complaints Feedback Mechanism, R4R wants to resolve the complaint in an equitable, objective and unbiased manner. Upon conclusion, the Complaints Focal Point will communicate the outcome to the complainant and explain the steps that were taken as part of the investigation process. At this point, the complainant will also be informed that there is a Complaints Appeal Process.

e) Withdrawal of a Complaint

If a complainant wants to withdraw their complaint, we will ask them to confirm this in writing. If a complaint is withdrawn, it cannot be reopened.

d) Complaint Management

All complaints are stored in a password protected database. This document is only to be edited by the complaints focal point and is password protected. Complaints are ranked according to the ranking system set out in Annex 4 by the Complaints Focal Point.

Where a complaint is ranked as requiring follow up, the complainant will receive a response from the R4R Complaints Focal Point within two working days of registering the complaint. This is the beginning of a two-way dialogue that is led by the Complaints Focal Point. The complaint can be closed with written confirmation from the complainant that the complaint has been addressed. The whole process, including the length of time that a complaint takes to be addressed, is recorded in line with confidentiality standards. A complaint cannot be closed due to no response, but will be recorded as 'pending' if no response is received within 30 days from the R4R complaints focal follow up.

A Complaints Handling Committee is established as an oversight mechanism of the whole process (see Annex 2 for full terms of Reference). ***Complaints that are ranked as 'serious complaints' by the Complaints Focal Point will be referred to the 'Complaints Handling Committee' (see Annex 4).*** This process is an automatic escalation. The committee will meet within 24 hours of a complaint being received and the complainant will be contacted within 48 hours of making the complaint. Written minutes will be recorded from the complaints committee meetings to track decision making processes and tangible action taken. The complaint can be closed with written confirmation from the complainant that the complaint has been addressed. The whole process, including the length of time that a complaint takes to be addressed, is recorded in line with

confidentiality standards. A complaint cannot be closed due to no response, but will be recorded as 'pending' if no response is received within 30 days from the R4R complaints focal follow up.

In cases where a complaint is made against a member of the Complaints Management Committee, that person is automatically excluded from the process. If the complaint is specifically against the Complaints Focal Person, then one committee member steps into that role and the committee operates with one less member.

There is no time limit for a complaint to be made, responded to, managed and investigated, however, the complainant should be aware that it might not always be possible to investigate a complaint in full if we have been informed a long time after the incident. This will be reviewed on a case by case basis.

e) Complaints Monitoring

A monthly overview of complaints received is generated by the complaints focal point and are presented to the 'Complaints Handling Committee' in a monthly 'Complaints and Lessons Learned' meeting. The objective of this monthly meeting is as follows;

Overview of complaints received (non-confidential information only)

Overview of complaints status; Open/Closed/Pending

Overview of actions taken and the length of time for complaints to be addressed

Trends in complaints and action taken. This information will be made into a publicly available report

Any other Business

f) Complaints Appeal Process

The complainant, as well as the subject of the complaint, have the right to make an appeal in writing, providing a justification and within 14 days of the outcome. Any appeal made after a well-founded complaint must be respected and managed by an independent person or panel that is elected by the Complaints Handling Committee; this person/panel will review the complaint and investigation process undertaken and then take the decision to either 1) uphold the complaint in full, or in part, or 2) dismiss the complaint. During an Appeals process, no new complaint can be submitted, nor any evidence unrelated to the initial complaint. After the appeal, there is no further process and the result will be communicated to all involved parties by this independent person/panel.

Adhering to Confidentiality:

All complaints will be handled with absolute confidentiality to protect the identity of the complainant(s). Any breach of confidentiality is regarded as major misconduct and will lead to disciplinary action.

Complaints that cannot be dealt with by this mechanism

All internal employment conditions like salary level, performance evaluations, working area etc. will not be handled within this system but are referred to the Head of Communications.

The complaints mechanism and procedures do not apply to complaints that are subject to current investigation by any regulatory body or legal or official authorities. These complaints include the following:

- Events requiring an independent inquiry into a serious incident involving national government authorities
- Events requiring investigation of a potential criminal offence within R4R
- Legal action - the complaints procedure will cease immediately if the complainant explicitly takes legal action in respect of the complaints

If the complaint is not within the scope of R4R, the complainant will be informed about this situation and, if possible, referred to the correct organisation/service provider/official for further action. In cases where the complaint contains issues that R4R is unable to deal with, R4R will work to offer the complainant contact with a qualified third party who could receive the complaint. In sensitive cases R4R has a responsibility to act for those requiring support after an investigation has been conducted, when and if possible.

Referral is not the responsibility of staff members and instead will be dealt with by the complaints focal point.

Staffs' obligation

- It is the responsibility of each member of staff in R4R to make sure that any complaints they hear about will be formalised. There is no such thing as an informal complaint so in the case a member of staff is confronted with an issue that is a complaint (either sensitive or non-sensitive), he/she must seek acceptance from the source to formalise the complaint and bring it to the complaints system in R4R.
- All R4R staff members and volunteers have an obligation to report sexual exploitation, sexual abuse, and abuse of power, fraud, corruption, failure to protect and safeguard children or breaches of conducts if they believe that it has occurred from anyone associated with the programme. If staff develops a concern or suspicion regarding PSEA, fraud, abuse of power, corruption, or any breaches of R4R policies by a fellow worker, s/he must report such concern to the R4R complaints focal point through the complaints channel.
- Apart from 'sensitive' complaints, all staff should respond positively to any complaints made to them and feel confident to do so. R4R management should ensure an atmosphere of trust, confidence and value orientation for this purpose. Guidance and procedures are provided for staff to avoid ad hoc, defensive, negative responses and uncertainty about what is expected of staff in responding to complaints. Staff needs to know what the steps are regarding dealing with complaints, who the specific focal point person is and the corresponding timelines to deal with complaints.

List of Annexures

Annex 1; Frequently Asked Questions (FAQs)

Annex 2; Complaints Handling Committee Terms of Reference and Membership

Annex 3; Complaints and Feedback; A statement on definitions

Annex 4; Types of Complaints; Complaints Ranking System

Annex 1; Frequently Asked Questions (FAQs)

1. Is there a time limit from when an incident happened to when I can make a complaint?

No, there is no time limit for a complaint to be made; when a complaint is made we will endeavour to investigate it comprehensively no matter when it occurred. It is important to note however that the closer to the incident that a complaint is made, the easier it will be for us to investigate in full.

2. How long will it take for a complaint to be investigated?

It is impossible for us to give a definitive answer to this. We can commit to responding to your complaint within two working days however the time taken for the investigation will depend on the type of complaint and the depth of the investigation needed. We will not rush through an investigation process as this will not produce the most reliable outcome, which is our main priority.

3. What if I don't agree with the outcome of the investigation?

Though we will endeavour to conduct a thorough investigation, which is objective and fair in nature and enquiry, leading to a valid outcome, we understand that a complainant may not be satisfied by the investigative process and this is something we will address. As part of our CFM, we have a Complaints Appeals Process which will be explained to the complainant when the outcome of the investigation is communicated to them. If a complainant wants to lodge an appeal, they must do so within 14 days of the investigation conclusion.

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Annex 2; Complaints Handling Committee Terms of Reference and Membership

Endorsed by the members of the Complaints Handling Committee on 24th March 2021. Further amendments require endorsement in the form of an addendum signed by all members.

Purpose

The complaints and feedback mechanism established by R4R to manage complaints is managed by a complaints focal person. Complaints ranked as 'sensitive' according to the policy's ranking system are referred to a committee. This Complaints Handling Committee has the following objectives;

1. Manage 'sensitive' complaints, including identifying necessary follow up actions and documents required, actions that are recommended to be taken, and summarize recommendations in the format of a report.
2. Participate in a meeting once a month to review complaints received and flag trends in complaints and if management procedures are being followed.
3. Strengthen safeguarding mechanisms in the organisation and provide advice on where policies can be strengthened.

Membership

There are four members of the Complaints Management Committee. The committee is chaired by the complaints focal person who fulfills all administrative responsibilities. This person is not a voting member. This person must be a member of R4R in a management or Board capacity to have access to the necessary internal documentation required to manage complaints.

There are a further three voluntary members who hold the position for a period of six-months only. In the first iteration of the committee, members are selected based on head hunting by the Complaints Focal Person. In following rotations this will be based on applications. Applications will be judged based on an individual's experience, their ability to meet time commitments, and their willingness to participate. If three volunteer members cannot be identified the committee can function with two volunteer members.

Core Responsibilities

1. Participate in monthly meetings where an overview of complaints received are presented by the Complaints Focal Person. Input into a subsequent report that provides an external overview on complaints received and how they are managed.
2. If a 'severe complaint' is received, commit to two meetings per week with the purpose to manage the complaint. Actions include;
 - a. Agree on what follow up documents are required and make formal requests channeled through the Complaints Focal Person. The Complaints Focal Person then gathers these and presents these back to the committee.
 - b. Make recommendations for outcomes of the complaint.
 - c. Where appropriate, communicate with the complainant.
 - d. Input into a report on the complaint process and the final recommendations of the committee and share this with R4R.
3. Maintain confidentiality of all information
4. Make recommendations to R4R on how processes can be improved to promote safeguarding.

Annex 3; Complaints and Feedback; A statement on definitions

R4R defines a 'complaint' as a formal expression of dissatisfaction or discontent, and/or misconduct, about someone or someone's work.

R4R distinguishes the term 'complaint' from 'feedback'. Feedback is any positive or negative informal statement of opinion about someone or some work. A complaint requires a formal response as described in the procedures below, whereas feedback is an ongoing dialogue on activities. Both types can be recorded to formalise the feedback to R4R for better programming.

Having a complaint handling system that is confidential, safe and accessible is only one way of raising concerns with R4R. R4R also welcomes ongoing communication and dialogue between staff members, volunteers, stakeholders, and the communities we work with so we can continually improve our services.

Annex 4; Types of Complaints; Complaints Ranking System

R4R categorizes complaints into 3 categories. The system is designed to handle both operational complaints and sensitive complaints. The system ensures that all information about sensitive complaints is handled confidentially, and all members of staff and management have a duty to respect and uphold high standards of confidentiality.

a. Non-sensitive requests for information, problem solving or follow-up

These may involve issues such as information about the support, activities or problems with the required documents needed to receive assistance (ID).

The Complaints Focal Point is responsible for the management of such complaints and with the permission of the complainant can refer the complaint to the correct operational staff member.

b. Non-sensitive Complaints

Possible non-sensitive complaints can be about (but not limited to): Issues of entitlements and commitments not met

- The quality and relevance of the service or response, timeliness, security, non-fulfillment of promises or expectations, and lack of information
- Dissatisfaction about the response activities
- R4R staff/volunteer behaviour not classified as a sensitive complaint
- How a service has been managed, which has a direct impact on the refugees and the affected population

Specific program related non-sensitive complaints and concerns are dealt with by the R4R Complaints Focal Point and with the permission of the complainant can refer the complaint to the correct operational staff member.

c. Sensitive complaints

A sensitive complaint is typically a complaint about suspected corruption, sexual exploitation or another gross violation of our staff rules.

Possible sensitive complaints can be (but not limited to):

- Complaints about misbehaviour, misuse of position or gross misconduct by a R4R staff
- Complaints about violation of R4R's Code of Conduct and related policies, such as the policy to prevent sexual exploitation or safeguarding of children
- Conduct that compromises security or poses other risk to the activities or staff
- Criminal offence
- Abuse of power manifested against those with less social power and how they are treated physically and or psychologically
- Staff members involved in corruption or abuse of one's position for private gain, such as misusing the financial and other resources of the organization
- Sexual harassment or unwelcome sexual advance, comment, expressed or implied sexual demand, touch, joke, gesture, or any other communication or conduct of a sexual nature, whether verbal, written or visual by any person to another individual within the scope of work
- Behaviour or activities that fails to safeguard children or that puts children at risk

Sensitive complaints should be investigated as formal complaints. In a situation where a person discloses such allegations to any staff of R4R, it must be reported with the consent of the complainant.

The R4R staff either file the complaint on their behalf (most likely situation in the context) or help them file the complaint. R4R will not investigate a complaint against the will of the affected person.

All sensitive complains must be reported to the Complaints Focal Point through the above mentioned channel and will be immediately referred to the Complaints Handling Committee. No action can be taken before this referral has happened, and all follow up action is based on documented agreement of the Complaints Handling Committee. This Committee is external to all R4R operations to ensure arms-length, consistency and compliance.

Anonymous complaints: An anonymous complaint refers to a complaint that is lodged without revealing the identity of the complainant. R4R does not accept entirely anonymous complaints if they require follow up. However, R4R accepts an anonymous complaint through an R4R employee who knows the identity of the complainant and can obtain follow-up information from the complainant.

False Accusations: If an investigation into a complaint results in a recognition that a staff member has purposely made a false accusation against another staff member, the staff will be subject to disciplinary action (warning/dismissal).