

# Community Feedback Mechanism

Guidance and Toolkit



The Danish Refugee Council (DRC) is a leading, international humanitarian displacement organisation, supporting refugees and internally displaced people across the globe. We work in conflict-affected areas, along the displacement routes, and in the countries where refugees settle.

We provide protection and life-saving humanitarian assistance and development and peacebuilding activities to ensure a dignified life for refugees, the displaced and displacement-affected people.

DRC was founded in Denmark in 1956.  
Our vision is a dignified life for all displaced.



# Community Feedback Mechanism

## Guidance and Toolkit

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**Version notes:** This first version is released for general use from March 2022. This document was developed in response to requests of many DRC field practitioners for clearer guidance and practical resources in all aspects of establishing and maintaining Community Feedback Mechanisms (CFMs). Based on user feedback, the guidance will be updated in the future as required. While in circulation, it should be referenced as v1.0.



## Foreword

There is immense value in listening to the people we serve. They know best what they need, and once they receive assistance, they are best placed to let us know how relevant and appropriate it is. Without such feedback we would be operating in the dark, without really providing assistance based on need or knowing whether our response achieved what it intended to.

At the same time, giving people an opportunity and channels to provide such feedback is not only good for the quality of our programmes. It is, very importantly, a basic human right for people to participate in the assistance that they receive, and while the ability to have a say is only the first step for people in such participation, it is a crucial foundation for other ways to participate and be heard. It creates, most importantly, a culture with a willingness to listen, to improve and work together in solving problems. It makes us accountable.

At DRC, we are committed to realising full accountability towards people affected by displacement and conflict: the people we serve. We strive to be accountable by using power responsibly, to ensure the rights and voices of affected people are valued and heard, and to give the opportunity for people to participate in and influence relevant decisions affecting them. We must also ensure that we create a culture where feedback is always welcome and sought after, so we can understand people's perspectives and ensure responsiveness to their needs.

We have come a long way in getting better at this. We have just entered the second cycle of certification against the Core Humanitarian Standard (CHS), and the regular audits we undergo as part of remaining certified tell us that while there is still a lot of improvement needed, we have made a lot of progress in being more accountable to people.

This guidance is part of this progress and a crucial building block in our accountability framework. It provides a thorough, comprehensive, yet very accessible reference for planning, designing, implementing and assessing Community Feedback Mechanisms (CFMs). Written internally by Joanna Nevill, our global Accountability Advisor, it is an impressive piece of work that is grounded in DRC field reality and current best practices on how such mechanisms operate. Many DRC colleagues in different parts of the organisation were consulted and provided feedback and input to the document. On behalf of DRC, I am immensely grateful for the hard work and long hours that have gone into producing this guidance.

With the guidance in place, we must now commit to making accountability a reality. It is my hope that this manual will be central to this endeavour, and widely used in DRC country offices as a key reference for implementing our programmes.

Copenhagen, March 2022

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**Design:** Sophie Combette.

# Abbreviations and Acronyms

<b>AAP</b>	Accountability to Affected Populations
<b>AGD</b>	Age, gender and diversity
<b>AO</b>	Authorising Officer
<b>CBO</b>	Community-based Organisation
<b>CCCM</b>	Camp Coordination and Camp Management
<b>CFM</b>	Community Feedback Mechanism
<b>CHS</b>	Core Humanitarian Standard
<b>CoC</b>	Code of Conduct
<b>CoCRM</b>	Code of Conduct Reporting Mechanism
<b>CP</b>	Child Protection
<b>CwC</b>	Communicating with Communities
<b>DNH</b>	Do-no-harm
<b>DRC</b>	The Danish Refugee Council
<b>FAQ</b>	Frequently Asked Question
<b>FGD</b>	Focus-group Discussion
<b>FRRM</b>	Feedback Referrals and Resolution Mechanism
<b>GBV</b>	Gender-based violence
<b>GP</b>	General Protection
<b>HDP</b>	Humanitarian Disarmament and Peacebuilding
<b>HLP</b>	Housing, Land and Property
<b>HQ</b>	Headquarters
<b>HR</b>	Human Resources
<b>HRP</b>	Humanitarian Response Plan
<b>IASC</b>	Inter-agency Standing Committee
<b>ICRC</b>	The International Committee of the Red Cross
<b>ICT</b>	Information and Communications Technology
<b>IDP</b>	Internally Displaced Person
<b>IEC</b>	Information, Education and Communication
<b>IHL</b>	International Humanitarian Law
<b>IMS</b>	Information Management System
<b>INGO</b>	International Non-governmental Organisation
<b>KII</b>	Key Informant Interview
<b>LGBTIQ+</b>	Lesbian, gay, bisexual, pansexual, transgender, genderqueer, queer, intersex, agender, asexual or other queer-identifying people

<b>LLH</b>	Livelihoods
<b>M&amp;E</b>	Monitoring and Evaluation
<b>MEAL</b>	Monitoring, Evaluation, Accountability and Learning
<b>MoU</b>	Memorandum of Understanding
<b>NFI</b>	Non-food item
<b>NGO</b>	Non-governmental organisation
<b>NSA</b>	Non-state actor
<b>OHCHR</b>	United Nations Human Rights Office of the High Commissioner
<b>PDM</b>	Post-Distribution Monitoring
<b>PIM</b>	Protection Information Management Framework
<b>PoC</b>	Person (or People) of Concern
<b>PSEAH</b>	Protection from Sexual Exploitation, Abuse and Harassment
<b>PWD</b>	People with a Disability
<b>RBA</b>	Rights-based Approach
<b>RP</b>	Complainant or reporting person
<b>RSM</b>	Report of Suspected Misconduct
<b>SEAH</b>	Sexual Exploitation, Abuse and Harassment
<b>SGA</b>	Sub-grant agreement
<b>SMT</b>	Senior Management Team
<b>SOP</b>	Standard Operating Procedure
<b>ToR</b>	Terms of Reference
<b>UN</b>	United Nations
<b>UNHCR</b>	United Nations High Commissioner for Refugees
<b>UNICEF</b>	United Nations Children's Fund
<b>WASH</b>	Water, Sanitation and Hygiene

# Glossary

<b>Accountability to Affected Populations (AAP)</b>	An active commitment and process of humanitarian actors to use power responsibly by giving account to, taking account of and being held to account by different stakeholders, and primarily those who are affected by the exercise of such power. <sup>1</sup>	<b>Community Feedback Mechanism (CFM)</b>	A formal system established to allow crisis-affected populations to communicate information on their views, concerns and experiences of a humanitarian agency or of the wider humanitarian system. A CFM systematically captures, records, tracks and follows up on the feedback it receives to improve elements of a response. <sup>7</sup>
<b>Associated personnel (and/or representatives)</b>	Personnel also engaged with work or visits related to an organisation, including but not limited to: consultants, volunteers, incentive workers, contractors and programme visitors.	<b>Communities and people affected by crisis (or crisis-affected populations)</b>	The totality of all people regardless of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status or other diversity characteristics with different needs, vulnerabilities and capacities who are affected by disaster, conflict, poverty, or other crises at a specific location. <sup>8</sup>
<b>Code of Conduct (CoC)</b>	The set of standards about the behaviour that staff and volunteers of an organisation are obliged to adhere to.	<b>Confidentiality</b>	The principle of not disclosing information or personal details that should be kept private or secret unless a person has provided informed consent for disclosure. <sup>9</sup>
<b>Code of Conduct Reporting Mechanism (CoCRM)</b>	The mechanism that allows any person to report a suspicion of a breach of DRC's Code of Conduct committed by one or more DRC staff. The CoCRM concerns the behaviour of DRC staff. <sup>2</sup>	<b>Consent</b>	Permission or voluntary approval from a data subject to process or use their information or personal data as explained to them. <sup>10</sup>
<b>Civil society</b>	Citizens who are linked by common interests and collective activity but excluding for-profit and private sector organisations. It can be informal or organised into non-government organisations (NGOs) or associations. <sup>3</sup> In civil society, people meet, debate, organise, and take collective action. This can be to claim their own rights as legitimate representatives and rights-holders, or to support others and thereby promote larger societal change. <sup>4</sup>	<b>Core Humanitarian Standard (CHS)</b>	A voluntary code that describes the essential elements of principled, accountable and quality humanitarian action based on nine core commitments to measure and improve assistance by placing communities and people affected by crisis at the centre of interventions. <sup>11</sup>
<b>Coercion</b>	Forcing someone to do something against their will. <sup>5</sup>	<b>Corruption</b>	The abuse of entrusted power for private gain, including financial corruption such as fraud (see below), bribery, extortion and receiving kickbacks (illicit payments in return for facilitating transactions or contacts with influential people). Exchanging relief goods in return for sexual favours, preferential treatment of friends or relatives when recruiting or providing assistance, and the manipulation of distribution lists and diversion of resources are also forms of corruption. <sup>12</sup>
<b>Complaint</b>	A specific grievance, negative reaction or viewpoint communicated by anyone who has been negatively affected by an organisation's actions or who believes that an organisation has failed to meet a stated commitment. <sup>6</sup> A complaint is an official notification of dissatisfaction (verbal or written) about an organisation's performance that may require corrective action, response or investigation.	<b>Data protection</b>	The systematic application of a set of institutional, technical and physical safeguards that preserve the right to privacy with respect to the collection, storage, use and disclosure of personal data. <sup>13</sup>
<b>Complaint's procedure</b>	A specified series of actions through which an organisation deals with complaints and ensures that complaints are reviewed and acted upon.	<b>Data security</b>	Includes the physical, technological or procedural measures that safeguard the confidentiality, integrity and availability of data and prevent its accidental or intentional, unlawful or otherwise unauthorised loss, destruction, alteration, acquisition or disclosure. Examples include restricting users and limiting access to data, password-protections, encrypting data, and measures to protect the network. <sup>14</sup>
<b>Complainant or Reporting Person (RP)</b>	A person reporting through any feedback or complaints mechanism, either via community modalities of the Community Feedback Mechanism (CFM), or the CoCRM.		
<b>Community-based organisations (CBOs)</b>	Non-profit groups that work at a local level to generate improvements within a community to enhance life for residents, such as their social health, wellbeing, or natural environment.		

1 Inter-agency Standing Committee, *Five Commitments to Accountability to Affected Populations*, (IASC n.d.), retrieved from here, p1 (accessed December 2021)

2 Danish Refugee Council, Operations Handbook. *'Accountability: Code of Conduct Reporting Mechanism (CoCRM)'*. Danish Refugee Council, Denmark, 2018 (version 3.1)

3 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p37

4 Danish Refugee Council, *Global Civil Society and Engagement Strategy*, (DRC 2020), p3

5 Inter-agency Standing Committee, *Policy: Protection in Humanitarian Action*, (IASC 2016), p13

6 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p37

7 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p37

8 Ibid., p38

9 United Nations, *Glossary on Sexual Exploitation and Abuse*, (UN 2017), retrieved from this link, p1 (accessed December 2021)

10 Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved from here, p11 (accessed December 2021)

11 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p2

12 Ibid., p37

13 Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p29

14 Ibid., p30

<b>Deprivation</b>	Preventing people from accessing basic necessities, such as goods and services they need. This can be deliberate or unintended, direct or indirect and may include discrimination. <sup>15</sup>	<b>Employee</b>	A person employed directly by DRC assigned to perform tasks on behalf of DRC, in return for financial compensation and usually on a fixed term of employment as outlined under a contract of services (employment agreement).
<b>Diversity</b>	Refers to the full range of different socio-demographic backgrounds and identities that make up populations. This includes, but is not limited to, gender identity and expression, sexual orientation, age, disability, health, socio-economic status, religion, nationality, race, and ethnic origin (including minority and migrant groups). <sup>16</sup>	<b>Evaluation</b>	A process that attempts to determine as systematically and objectively as possible the relevance, effectiveness and impact of activities in light of their objectives. Evaluations can provide assessments of what works and why, and highlight intended and unintended results for accountability and learning purposes. <sup>21</sup>
<b>Duty-bearers</b>	State or non-state actors with obligations towards rights-holders. <sup>17</sup> The state holds the primary responsibility to respect, protect and fulfil the rights of rights-holders. In the case of armed conflict, armed non-state actors taking part in hostilities also have obligations and responsibilities under International Humanitarian Law (IHL) for the protection of civilians. Certain UN bodies – the United Nations Human Rights Office (OHCHR), the United Nations High Commissioner for Refugees (UNHCR) and the United Nations Children’s Fund (UNICEF) – are mandated agencies by the UN General Assembly, a convention, or the Security Council (peace-keeping missions) to protect a particular group of people, e.g., UNHCR in the case of refugees, and/or in a particular situation. The International Committee of the Red Cross (ICRC) has a particular role and responsibility to promote IHL and to hold states and armed non-state actors to account for the protection of civilians in situations of armed conflict. <sup>18</sup>	<b>Evidence</b>	Information on which a judgment or conclusion can be based. In humanitarian work, different evidence can be used including observations, quantitative and qualitative information. <sup>22</sup>
<b>Do-no-harm (DNH)</b>	Often used in a broad sense to refer to the key humanitarian principle that seeks to prevent exposing communities to additional risks through our actions or inactions in the provision of assistance. However, DNH is also an approach and one of several tools that enable organisations to base their programming on an adequate conflict sensitivity assessment. The DNH framework helps organisations understand the complex relationships among groups in their context of operation by using Dividers and Connectors as an analytical method; assists in understanding how programmes and policies will interact with the specificities of their operational context; and offers practitioners a starting place for adapting their interventions to minimise negative impacts of programming and operations and build upon their positive impacts. <sup>19</sup>	<b>Feedback</b>	The general term used for any information or viewpoint shared by a community member with an organisation. Feedback can be positive, negative, or neutral and is either non-sensitive or sensitive in nature.
<b>Duty of care</b>	A moral or legal obligation to ensure the safety of others. Duty of care entails meeting recognised minimum standards for the well-being of crisis-affected people and paying proper attention to their safety and the safety of staff. <sup>20</sup>	<b>Feedback channel</b>	Also referred to as modalities, or entry points (used interchangeably), feedback channels are the means through which an organisation decides how to formally collect feedback managed by dedicated staff operating the CFM.
		<b>Feedback loop</b>	The cycle of gathering feedback from crisis-affected populations, acknowledging this feedback, using this information to improve an organisation’s work and then communicating a response back to communities about the actions taken to address it, which forms a ‘feedback loop’, or circle back to the complainant.
		<b>Fraud</b>	The act of intentionally deceiving someone to gain an unfair or illegal advantage (financial, political or otherwise). <sup>23</sup>
		<b>Gate A</b>	The term used to refer to DRC’s CoCRM field mechanism established by the country operation.
		<b>Gate A+</b>	The term used to refer to DRC’s CoCRM mechanism established by a regional office.
		<b>Gate B</b>	The term used to refer to DRC’s CoCRM mechanism operating at the Headquarters (HQ) level.

15 Inter-agency Standing Committee, *Policy: Protection in Humanitarian Action*, (IASC 2016), p13

16 Danish Refugee Council, *Age, Gender and Diversity Mainstreaming Policy*, (DRC 2020), p13

17 International Organisation for Migration, *Rights-based approach to programming*, (IOM 2015), retrieved from here, p17 (accessed December 2021)

18 Danish Refugee Council, *Programme Handbook*, (DRC 2013), pp52-51

19 Danish Refugee Council, *Conflict Analysis Guidelines (Glossary)*, (DRC 2020), p2

20 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p37

21 Ibid., p38

22 Ibid.

23 Ibid.

<b>Gender</b>	The social, cultural and psychological qualities that are associated with being a woman, man, girl or boy. This can also encompass personal identity and expression as well as societal, structural and cultural norms. Gender roles are learned, changeable over time, and variable within and between cultures. Gender often defines the duties, responsibilities, constraints, opportunities and privileges of being a woman, man, girl or boy in any context. DRC recognises that gender is not binary, and that terms and definitions related to gender are diverse and continue to evolve. While acknowledging that worldwide gender discrimination particularly affects women and girls, DRC supports a broad understanding of gender, which does not only focus on women and girls but also takes into account the different needs of men and boys and other gender identities. <sup>24</sup>
<b>Gender equality</b>	Refers to the equal enjoyment by persons of all genders, of rights, opportunities, resources and rewards. Equality does not mean that persons of different genders are the same, but that their enjoyment of rights, opportunities and life chances are not governed or limited by their gender. <sup>25</sup>
<b>Gender-based violence (GBV)</b>	Umbrella term for any harmful act directed towards or disproportionately affecting a person because of their actual or perceived gender identity. The term ‘gender-based violence’ is used to emphasise that structural, gender-based power differentials around the world place women and girls at risk of multiple forms of violence. While women and girls suffer disproportionately from GBV, men and boys can also be targeted. It can include sexual, physical, mental and economic harm inflicted in public or in private. It also includes threats of violence, coercion and manipulation taking many forms such as intimate partner violence, sexual violence, child marriage, female genital mutilation and so-called honour killings. GBV can also be used to describe targeted violence against LGBTIQ+ populations, in these cases when referencing violence related to norms of masculinity, femininity and/or gender norms. <sup>26</sup>
<b>Hotline</b>	A direct phone line set up for a specific purpose; for example, a telephone number that allows people wishing to raise queries, report feedback or complaints to do so. A hotline may be complemented with other technological-based feedback channels, such as social media messaging, online forms, or an email address.
<b>Host community</b>	Refers to local communities hosting refugees, internally displaced people, or other conflict-affected populations.
<b>Humanitarian action</b>	Action taken with the objective of saving lives, alleviating suffering and maintaining human dignity during and after human-induced crises and natural disasters, as well as action taken to prevent and prepare for them. <sup>27</sup>

24 Danish Refugee Council, *Age, Gender and Diversity Mainstreaming Policy*, (DRC 2020), p14

25 Ibid.

26 United Nations, *Glossary on Sexual Exploitation and Abuse*, (UN 2017), retrieved from this link, p9 (accessed December 2021)

27 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p38

<b>Human rights</b>	The universal basic rights and freedoms belonging to and inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion or any other status. Human rights are founded on the respect for the dignity and worth of each person and include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, and the right to work and education. Everyone is entitled to these rights, without discrimination. International human rights law outlines the obligations of governments to act in certain ways or to refrain from certain acts in order to promote and protect human rights and fundamental freedoms of individuals or groups. <sup>28</sup>
<b>Human rights violations</b>	Acts and omissions attributable to the state involving the failure to implement legal obligations deriving from human rights standards thus denying individuals their fundamental freedoms and entitlements.
<b>Incentive worker</b>	A person who works for compensation or an incentive for work that is done on communal projects to improve, preserve or rehabilitate community services, resources or infrastructure.
<b>Information and communications technology (ICT)</b>	Technologies that provide access to information through telecommunications such as the internet, wireless networks, cell phones, computers, software, video-conferencing, social networking, and other media applications and services enabling users to access, retrieve, store, transmit and manipulate information in a digital form. <sup>29</sup>
<b>Informed consent</b>	A person who agrees to an interaction or action based on a clear understanding of the facts and implications or any available alternatives. <sup>30</sup>
<b>Internally displaced person (IDP)</b>	Refers to a person who has been forced or obliged to flee or leave their home of habitual residence, in particular as a result of or in order to avoid the effects of armed conflict, situations of generalised violence, violations of human rights or natural or human-made disasters, and who have not crossed an internationally recognised state border. <sup>31</sup>
<b>International Humanitarian Law (IHL)</b>	Also referred to as the laws of armed conflict, IHL regulates the conduct of war. IHL is a branch of international law that seeks to limit the effects of armed conflict by protecting persons who are not participating in hostilities, and by restricting and regulating the means and methods of warfare available to combatants. <sup>32</sup>

28 United Nations, *Global Issues: Human Rights*, (UN 2021), retrieved from this link (accessed December 2021)

29 Food and Agriculture Organisation of the United Nations, *Information and Communication Technologies (ICT)*, (FAO 2021), retrieved from this link (accessed December 2021)

30 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p38

31 United Nations High Commissioner for Refugees, *Emergency Handbook: IDP definition*, (UNHCR 2021), retrieved from this link (accessed December 2021)

32 IPU and ICRC, *International Humanitarian Law Handbook*, (IPU, ICRC 2016), p8

<b>International Human Rights Law</b>	International human rights law lays down obligations that states are bound to respect. By becoming parties to international treaties, states assume obligations and duties under international law to respect, protect and fulfil human rights. The obligation to respect means that states must refrain from interfering with or curtailing the enjoyment of human rights. The obligation to protect requires states to protect individuals and groups against human rights abuses. The obligation to fulfil means that states must take positive action to facilitate the enjoyment of basic human rights. Through ratification of international human rights treaties, governments undertake to put into place domestic measures and legislation compatible with their treaty obligations and duties. <sup>33</sup>	<b>Non-state actor (NSA)</b>	Organisations and/or individuals that are not affiliated with, directed by, or funded by any government. The interests, structure and influence of NSAs vary widely. For example, NSAs include non-governmental organisations (NGOs), corporations, media organisations, people's liberation movements, lobby groups, religious groups, aid agencies, and violent non-state actors such as paramilitary forces. <sup>34</sup>
<b>Investigator</b>	A person who is assigned to carry out an investigation under clear Terms of Reference and, as a rule, trained in using the DRC Investigation Guidelines under the CoCRM.	<b>Participation</b>	Establishing and maintaining a relevant representative dialogue with crisis-affected populations and key stakeholders at every opportunity throughout the humanitarian programme to enable those affected populations to play an active role in the decision-making processes that affect them. <sup>35</sup> Participation is the voluntary and meaningful engagement of crisis-affected people in different processes and activities that affect them throughout the humanitarian response. It entails the notion that all people, especially the most at-risk and disadvantaged, have the right to express their views and be involved in all matters affecting them or their communities. It is achieved through the establishment of clear guidelines and practices to engage them appropriately and ensure that the most marginalised and worst affected are also represented and have influence. <sup>36</sup>
<b>LGBTIQ+</b>	A common and evolving umbrella acronym for people who identify as lesbian, gay, bisexual, pansexual, transgender, genderqueer, queer, intersex, agender, asexual and other queer-identifying people.	<b>Partners</b>	Organisations working jointly within a formal arrangement to achieve a specific goal, with clear and agreed roles and responsibilities. <sup>37</sup>
<b>Misconduct</b>	A breach of DRC's Code of Conduct or another obligation under DRC's regulations. Under the CoCRM, the term misconduct is used to refer to DRC's Code of Conduct only. Misconduct may include, but is not limited to: harassment, violence, sexual abuse, staff taking money for assistance, favouring family and friends for assistance or during recruitments, exertion of pressure on People of Concern or staff, corruption, theft, falsification of records, disregard of health and safety standards and unauthorised disclosure of confidential information.	<b>Perpetrator</b>	A person who carries out a harmful, illegal or immoral act such as sexual exploitation, abuse and harassment (SEAH) or other type of crime or offence. It can also refer to state institutions, entities or agencies that have failed to meet their human rights obligations. <sup>38</sup>
<b>Monitoring, Evaluation, Accountability and Learning (MEAL)</b>	MEAL is a core and constitutive part of the project management cycle that includes tracking the progress of programmes, making adjustments and assessing the results. It is about applying the knowledge gained from evidence and analysis to improve humanitarian responses, and ensuring accountability for actions and decisions taken, as well as the resources used to achieve them. It focuses on learning to foster change and influence decision-making and course corrections.	<b>Person/People of Concern (PoC)</b>	DRC's target group in accordance with DRC's mandate (refugees, IDPs and other people affected by displacement or conflict).
<b>Non-sensitive complaint</b>	Non-sensitive complaints relate to the shortcomings in the performance of DRC's work and/or other humanitarian actors, and usually involve expressed dissatisfaction with the quantity or quality, processes, decisions or actions of humanitarian assistance provided.	<b>Personal data</b>	Personal data is any information that relates to an identified or identifiable living individual. <sup>39</sup> For example, different pieces of information that collected together, can lead to the direct or indirect identification of a particular person, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person. <sup>40</sup>
<b>Non-sensitive feedback</b>	Feedback that relates to the operational or programmatic undertakings of the organisation, e.g., opinions, questions, requests, suggestions, reports or complaints regarding the activities, services, processes or actions (or lack of action) of DRC and/or other humanitarian actors.		

33 United Nations, *The Foundation of International Human Rights Law*, (UN 2021), retrieved from this link (accessed December 2021)

34 Chickering, Lawrence A., et al. *Strategic Foreign Assistance: Civil Society in International Security*, (Hoover Institution Press 2006)

35 Barry et al, *Review of Existing Practices to ensure Participation of Disaster-affected Communities in Humanitarian Aid Organisations*, (European Commission 2012), retrieved from this link, pp10-11 (accessed December 2021)

36 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39

37 Ibid.

38 United Nations, *Glossary on Sexual Exploitation and Abuse*, (UN 2017), retrieved from this link, p12 (accessed December 2021)

39 European Commission, *Data Protection: what is personal data?* (European Union 2021), retrieved from this link (accessed December 2021)

40 Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p7

<b>Project focal point</b>	A person within sector teams designated to promote and mainstream the CFM, receive and follow up non-sensitive feedback, and report outcomes back to the CFM/Accountability team.
<b>Protection</b>	All activities aimed at ensuring the full and equal respect for the rights of all individuals, regardless of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status or other background. Protection goes beyond the immediate life-saving activities that are often the focus during an emergency. <sup>41</sup> Protection aims to prevent, reduce and respond to the risks and consequences of violence, coercion, deliberate deprivation and abuse in humanitarian settings, in compliance with the humanitarian principles and within the framework of international law. <sup>42</sup>
<b>Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)</b>	PSEAH refers to measures taken to protect people from sexual exploitation, abuse and harassment, by their own staff and associated personnel, in the provision of aid. <sup>43</sup>
<b>Quality</b>	The totality of features and characteristics of humanitarian assistance that support its ability to, in time, satisfy stated or implied needs and expectations, and respect the dignity of the people it aims to assist. <sup>44</sup>
<b>Query (or request for information)</b>	Asking a question or for information about a particular matter. This may be in relation to the services, activities or other actions of DRC, and/or the wider humanitarian system.
<b>Referral</b>	The process of directing a complainant to another service provider or actor because they require assistance that is outside the expertise or scope of DRC's work and direct influence to handle. The concerns raised may be of a sensitive or non-sensitive nature.
<b>Refugee</b>	Refers to a person who, because of a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group or political opinion, is outside the country of their nationality and is unable or, because of such fear, is unwilling to avail themselves of the protection of that country. <sup>45</sup>
<b>Report of Suspected Misconduct (RSM)</b>	A report submitted by a complainant or reporting person about a suspicion that misconduct has happened or will happen.
<b>Request for assistance</b>	Asking for support or specific humanitarian assistance, including financial, material, psychosocial, medical and protection.

41 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39

42 European Commission, *DG ECHO Thematic Policy Document Humanitarian Protection*, (ECHO 2016), p6

43 CHS Alliance, *PSEAH Implementation Quick Reference Handbook*, (CHS Alliance 2020), p2

44 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39

45 United Nations High Commissioner for Refugees, *Emergency Handbook: Refugee definition*, (UNHCR 2021), retrieved from this link (accessed December 2021)

<b>Rights-based approach (RBA)</b>	A normative, analytical and programming framework that focuses on rights and responsibilities. <i>Rights</i> : Identification of the human rights that are being violated, those that are not being protected, respected and fulfilled, and a recognition that humanitarian needs to a large extent arise from the violation of rights. <i>Responsibility</i> : Clarification of roles and responsibilities. Recognition that someone, by commission or omission, is responsible for the right(s) being violated, for the rights not being respected, protected and/or fulfilled. A RBA focuses on the relationships between the rights-holders and duty-bearers. This includes the ability of rights-holders to claim their rights from the duty-bearers and the ability and willingness of duty-bearers, on their part, to respect, protect and fulfil the rights of the rights-holders. <sup>46</sup> In short, a RBA is about empowering people to know and claim their rights and increasing the ability and accountability of individuals and institutions who are responsible for respecting, protecting and fulfilling rights. <sup>47</sup>
<b>Rights-holders</b>	Every human being is a rights-holder, and every right has a corresponding duty-bearer. <sup>48</sup> Given the universal nature of human rights, every individual is a rights-holder and entitled to the same rights without distinction based on race, gender, age, language, religion, political or other opinion, national or social origin, disability, property, birth or other status, such as LGBTIQ+ and marital status. Every rights-holder has the responsibility to respect the rights of others. <sup>49</sup>
<b>Safeguarding</b>	Protecting people's health, well-being, and human rights, and enabling them to live free from harm, abuse and neglect. Safeguarding is about DRC's responsibilities, preventative, responsive and referral measures to protect people, including children and at-risk adults, from harm as a result of coming into contact with our staff, associated personnel or programmes. DRC's Global Policies on Safeguarding, Child Safeguarding and Safeguarding throughout the Employment Cycle set out the expected behaviour of all staff and DRC representatives within and outside office hours. <sup>50</sup>
<b>Sensitive feedback</b>	Any allegation related to serious violations of national or international law pertaining to the rights of the individual; any breach of the DRC Code of Conduct or Safeguarding policies; and/or safety and security threats targeting the humanitarian community.

46 Danish Refugee Council, *Programme Handbook*, (DRC 2013), pp 51-53

47 International Organisation for Migration, *Rights-based approach to programming*, (IOM 2015), retrieved from this link, p123 (accessed December 2021)

48 Danish Refugee Council, *Programme Handbook*, (DRC 2013), p51

49 International Organisation for Migration, *Rights-based approach to programming*, (IOM 2015), retrieved from this link, p123 (accessed December 2021)

50 Danish Refugee Council, *Global Safeguarding Policy*, (DRC 2020), p1

<b>Sexual Exploitation, Abuse and Harassment (SEAH)</b>	<p>SEAH is the term used to refer to sexual exploitation, abuse and sexual harassment.</p> <ul style="list-style-type: none"> <li>• <i>Sexual exploitation</i> refers to any actual or attempted abuse of 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. This includes acts such as transactional sex, solicitation of transactional sex, and exploitative relationships.</li> <li>• <i>Sexual abuse</i> is actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a minor (a person under the age of 18) is considered sexual abuse.<sup>51</sup></li> <li>• <i>Sexual harassment</i> is 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 our staff, be it in the workplace or with affected populations.<sup>52</sup></li> </ul>
<b>Staff</b>	A group of people who work for, are employed by or who represent DRC and are tasked with carrying out the work of the organisation. This may include national, international, and permanent or short-term employees, as well as volunteers and consultants. <sup>53</sup>
<b>Stakeholders</b>	People and institutions who can affect or are affected by DRC's actions, strategy or projects. For example, Persons of Concern, DRC staff and volunteers, UN agencies, NGOs, government authorities, partners, contractors, and staff of these institutions.
<b>State actor</b>	A state-based actor refers to a person or group acting on behalf of a government or government body.
<b>Subject</b>	The person or people suspected of misconduct.
<b>Survivor</b>	The person who it is alleged has been the subject of sexual harassment, abuse or exploitation. This term is generally preferred to 'victim' because it implies resilience. <sup>54</sup>

<b>Survivor-centred approach</b>	A survivor-centred approach seeks to empower the survivor by prioritising their rights, needs and wishes. It means ensuring that survivors have access to appropriate, accessible and good quality services including health care, psychological and social support, security and/or legal services. This approach aims to create a supportive environment where the survivors' rights are respected, and they are treated with dignity and respect. It helps promote a survivor's recovery and reinforce their capacity to make decisions about possible interventions. <sup>55</sup>
<b>Transparency</b>	Refers to openness, honesty and communication. An activity, project or organisation is transparent if information about it is open and freely available to the public. <sup>56</sup>
<b>Victim</b>	A person who claims to have been harmed, exploited, or abused by humanitarian staff and/or related personnel. If the claim relates to sexual exploitation, abuse, and harassment, the term 'survivor' is preferred.
<b>Violence</b>	The act or threat of physical or psychological abuse intended to injure, abuse, damage or destroy. <sup>57</sup>
<b>Volunteer</b>	A person who freely offers to undertake or expresses a willingness to undertake a service, task or activity in an organisation without being paid.
<b>Whistle-blower</b>	Any staff member who reports suspected misconduct at work. This includes the suspicion of fraud, misuse of resources, neglect of duties or when someone's health and safety is in danger. <sup>58</sup>
<b>Witness</b>	A person who has observed, experienced or has direct or indirect knowledge and information about something under investigation.

51 United Nations, *Glossary on Sexual Exploitation and Abuse*, (UN 2017), retrieved from this link, pp 5-6 (accessed December 2021)

52 CHS Alliance, *PSEAH Implementation Quick Reference Handbook*, (CHS Alliance 2020), p2

53 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39

54 United Nations, *Glossary on Sexual Exploitation and Abuse*, (UN 2017), retrieved from this link, p11 (accessed December 2021)

55 UN Women, *Programming Guidance: Conflict/Post-conflict – Survivor-centred approach*, (UN Women 2013), retrieved from this link (accessed December 2021)

56 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39

57 Inter-agency Standing Committee, *Policy: Protection in Humanitarian Action*, (IASC 2016), p15

58 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p39



## Introduction

Engagement with communities provides a basis for dialogue with people affected by a crisis not only on what is needed but also on how what is needed might best be provided. Engagement can help improve the appropriateness of a humanitarian response by, for example, identifying priority needs and preferences and by ensuring that local capacities are taken into account. It can strengthen the quality of assistance by facilitating dialogue and meaningful exchange between aid agencies and affected people at all stages of a humanitarian response and result in the empowerment of those involved.<sup>59</sup>

Participation in humanitarian action is understood as the engagement of affected populations in one or more phases of the project cycle: assessment, design, implementation, and monitoring, evaluation and learning. It can take a variety of forms whereby affected people have the power to influence their situation, decisions and humanitarian activities affecting them.<sup>60</sup> Participation is an operational approach that field staff must practise in their everyday work and needs to become a custom that is as routine as other project management actions. It means that at every opportunity, people affected by crisis are valued as dynamic social actors with insights on their situation, capacities, energy and ideas of their own that enable them to play an active role in decisions affecting their lives.<sup>61</sup>

The Core Humanitarian Standard (CHS) on Quality and Accountability is a global voluntary and measurable standard outlining the essential elements of principled, accountable and quality action.<sup>62</sup> The CHS places communities and people affected by crisis at the centre of humanitarian action and promotes respect for their fundamental human rights, including their right to be informed, provide feedback,

participate and hold organisations to account. A core part of the CHS concerns the obligation of humanitarian organisations to use power and resources responsibly, to understand how we should work with and actively engage affected people, and demonstrate accountability for our actions, decisions and results.

Community Feedback Mechanisms (CFMs) are key to ensuring that people affected by crisis have access to avenues to hold humanitarian actors to account. While the Danish Refugee Council (DRC) recognises that participation is much more than a CFM, they do offer affected people a formalised structure for raising concerns if they feel their needs are not being met, or if the assistance provided is having any unintended and harmful consequences. CFMs are fundamentally about engagement with crisis-affected populations to understand and solicit information on their experience of a humanitarian agency or response; and must be seen as part of a broader commitment to quality and accountability that genuinely enables organisations to recognise and respond to any failures in a response.<sup>63</sup>

Including people affected by crisis in everything we do may seem obvious; however, it remains a significant area of weakness for DRC and the humanitarian system at large.<sup>64</sup> Despite DRC's strong ambitions, recent CHS external certification compliance audits have documented that DRC achieves very low scores on indicators relating to the need for humanitarian responses to be based on community feedback and the establishment of safe and responsive mechanisms to handle complaints.<sup>65</sup> These weaknesses are centred around Commitments 4 and 5 of the CHS, which independent accredited auditors have repeatedly highlighted as significant areas of non-conformity.

59 ALNAP, *Participation Handbook for Field Workers: Section 1.2. Why 'do' participation*, (ALNAP 2009), retrieved from this link, pp 25-26 (accessed December 2021)

60 Ibid., p8

61 Ibid.

62 CHS Alliance et al, *Core Humanitarian Standard*, (CHS Alliance, The Sphere Project, Group URD 2021), retrievable here (accessed December 2021)

63 Ibid.

64 ALNAP, *State of the World Humanitarian System Report: Accountability & Participation*, (ALNAP, ODI 2018), p156

65 Humanitarian Quality Assurance Initiative, *DRC CHS Certification Reports*, (HQAI 2017-2021), retrievable here (accessed December 2021)

At the time of writing, DRC has learned that across many country operations, DRC does not systematically consult with communities and other stakeholders on the design, implementation and monitoring of feedback or complaints systems and does not ensure that information on how to access them is consistently available.<sup>66</sup> More alarmingly, CHS audits have also found that DRC does not ensure that communities are aware of the expected behaviours of staff, including commitments on the prevention of sexual exploitation, abuse and harassment.<sup>67</sup>

DRC’s weaknesses in this area are a sector-wide failure, and whilst there have been some limited improvements in the areas of accountability and participation generally, there is still a long way to go.<sup>68</sup> These guidelines and corresponding toolkit aim to improve DRC country operations overall compliance with both Commitment 4 and Commitment 5 of the CHS:

Commitment 4:  
Humanitarian response is based on communication, participation and feedback.

Commitment 5:  
Complaints are welcomed and addressed.<sup>69</sup>



### Purpose of this guidance

The purpose of this guidance is to:

- Provide DRC and partner staff with a **common approach** for establishing, implementing, and maintaining CFMs within DRC country operations. DRC staff can also draw on this document when supporting local partners without such guidelines.
- Enable our stakeholders, especially people and communities affected by crisis, to **raise feedback in a safe, confidential and accessible way** through mechanisms that are inclusive of everyone regardless of their diverse backgrounds, identities or attributes.
- Assist DRC and partners in **designing and strengthening their feedback mechanisms to promote the voices and influence of people affected by crisis and displacement** so their perspectives, rights and priorities remain at the forefront of our work.
- Offer an **accompanying practical toolkit** for DRC and partner staff to utilise in designing, implementing, monitoring, evaluating and learning from feedback mechanisms.

### Who is this guidance for?

This guidance aims to support Monitoring, Evaluation, Accountability and Learning (MEAL), programme and accountability teams, partners, or any staff member responsible for setting up or revising their country or regional CFM system. It should also be used to familiarise senior management with the requirements, resources and time needed to successfully implement quality CFMs and their role in maintaining these. Lastly, DRC regional offices can use this guidance for their own programming and/or to support country operations in adhering to the approach and core principles presented.

### Who is responsible for setting up Community Feedback Mechanisms at DRC?

It is the responsibility of the Country Director and Head of Programmes to secure both the human and financial resources needed to establish CFM systems across DRC’s interventions. This is in line with DRC’s 2025 Strategy and obligations as part of DRC’s global commitment to the CHS. When committing to CFM systems, senior leadership teams will have access to a consistent, structured and predictable means of dialogue throughout the project management cycle to better mitigate risk, adapt and improve our work.

It is acknowledged that all DRC country operations vary slightly in terms of their programming, structures, staffing and resources. Where DRC directly self-implements, the primary responsibility for the set-up and day-to-day management of the CFM should ideally sit within a separate unit unconnected to programme teams. This will provide staff overseeing the CFM with more independence and they can then report directly to senior management such as the MEAL Manager, Head of Programmes or Country Director.

The discussions and decision-making relating to who is responsible for what needs to take place at the country-office level. In some country offices with well-established and distinct MEAL teams, it is good practice for the CFM to be managed by dedicated accountability specialists within MEAL. However, in others where this is not the case, the CFM may sit with other sectoral or support services. This will depend largely on the size and overall set-up of the operation and availability of resources. What is crucial is that the CFM has dedicated staff members well trained in confidentiality, protection and safeguarding who can oversee the mechanism independently.

66 Ibid.  
67 Danish Refugee Council, *Learning Brief: Obstacles and Opportunities for DRC to address Commitment 5 of the Core Humanitarian Standard*, (DRC 2020), p3  
68 ALNAP, *State of the World Humanitarian System Report*, (ALNAP, ODI 2018), p24  
69 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), pp15 and 19



CFM systems should be established for the country operation as a whole, rather than for each project separately. Their success will depend on everyone within the operation being able to successfully embed feedback to be a fundamental part of our everyday actions, procedures and systems. This necessitates appropriate organisational-wide guidance, onboarding, training, and support to management and staff throughout DRC at all levels to develop, strengthen and reinforce the skills needed to facilitate DRC's commitments to accountability.

In programme work that is carried out by partners, the primary responsibility for the management of a CFM system will need to sit with them as they will be closest to the people we support. Where partners do not have the resources or appropriate CFM guidelines in place, DRC should always make sure that they are committed to supporting the establishment of such a system, either within their organisation or by utilising existing systems already developed by DRC. Where existing CFM systems are in place, these may look different depending on the nature, size and capacity of the partner.

## How to use this guidance

DRC and partner staff are encouraged to follow the approaches in this guidance as relevant for their country context, apply the principles outlined, and use the accompanying tools to plan, design, implement, analyse, utilise and learn from CFM systems.

When working in countries that are as diverse and wide-ranging as the country operations where DRC has a presence, it is vital that CFM systems are co-designed and led with communities to incorporate their experiences, diversity, knowledge and reality to ensure that mechanisms are relevant, utilised and ultimately effective. Therefore, DRC field operations have a high level of flexibility in applying both the ideals and practices recommended in this guidance. DRC encourages staff on the ground to make decisions based on their expertise and knowledge of their communities, with communities and partners, to embed a truly context-specific – rather than a ‘one-size-fits-all’ – approach to setting up CFMs.

Understanding that country operations will be at different stages of setting up CFMs, staff are encouraged to go to the sections that are of most relevance to them. Users of this guidance are expected to adapt it with the tools provided to suit their context, needs, resources and country-office structure. This guidance is divided into four main parts:

### PART 1

Introduces key terminology and the rationale for CFMs within DRC to communicate and promote understanding of key concepts.

### PART 2

Provides guidance on DRC's approach to design, implement and maintain a community feedback mechanism.

### PART 3

Summarises all accompanying practical tools throughout this guidance.

### PART 4

Provides an overview of the references and resources drawn on to develop this guidance.



# Part 1: The fundamentals of feedback

## The What: what is a Community Feedback Mechanism?

### «Community Feedback Mechanism»

A Community Feedback Mechanism (CFM) is a formal system established to allow crisis-affected populations to communicate information on their views, concerns and experiences of a humanitarian agency or of the wider humanitarian system. It systematically captures, records, tracks and follows up on the feedback it receives to improve elements of a response.<sup>70</sup>

CFMs play an important role in surfacing suggestions, ideas and concerns in regard to the delivery of DRC services and programming. They should be built on engagement with communities to ensure that the mechanisms are safe, appropriate and accessible to all by allowing feedback to be provided and responded to in a variety of formats. This

encourages individuals to contact DRC safely with their feedback about our activities or services in their area.

The information CFMs collect is systematically documented and then referred to appropriate entities for follow-up. Periodically, the feedback received should be analysed and reported on so that DRC can act to integrate and adapt programmes and strategy to improve the impact and relevancy of humanitarian assistance. CFMs are not a one-off activity and should enable a continuous dialogue between communities who share information they want to share, and DRC, who has a responsibility to act on the feedback received and respond to affected people.<sup>71</sup> Accordingly, CFM reports and outcomes can be shared for the purposes of learning and transparency within DRC and crucially also with communities. This will garner much trust and confidence in the system as efforts are made to ‘close the loop’ of the CFM apparatus.

CFMs should be designed to receive broad feedback from communities about their experiences with DRC or the humanitarian system at large. Such feedback includes opinions, questions, requests for assistance, suggestions, observations, beliefs/perceptions, rumours, myths or misconceptions.

«Important» **Complaints are also a type of feedback and CFMs are not designed to handle sensitive complaints directly, especially complaints relating to protection concerns or the misconduct of DRC staff, such as suspected sexual exploitation, abuse and harassment (SEAH), fraud or corruption.** However, CFMs do play a role in ensuring that affected people are provided with timely and appropriate referral pathways as per their wishes to relevant entities for response.

**The CFM is separate from DRC’s official complaints mechanism to address breaches of practice or behaviour. Any reports of suspected misconduct should be reported directly to DRC’s Code of Conduct Reporting Mechanism (CoCRM), which is DRC’s formal complaints mechanism allowing recipients to confidentially report abuses of power and to seek redress.** With recognition that safeguarding and other forms of misconduct may be shared through CFMs, they must be well linked to DRC’s official CoCRM channels to be processed differently. All sensitive feedback must be handled separately, carefully and confidentially.

<sup>70</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p38

<sup>71</sup> IFRC, *Feedback Starter Kit*, (IFRC 2019), retrieved from this link, p1 (accessed December 2021)

**«Feedback»** the general term used for **any information or viewpoint shared by a community member with an organisation.** It can be positive, negative or neutral and is either non-sensitive or sensitive in nature.

Feedback can include:

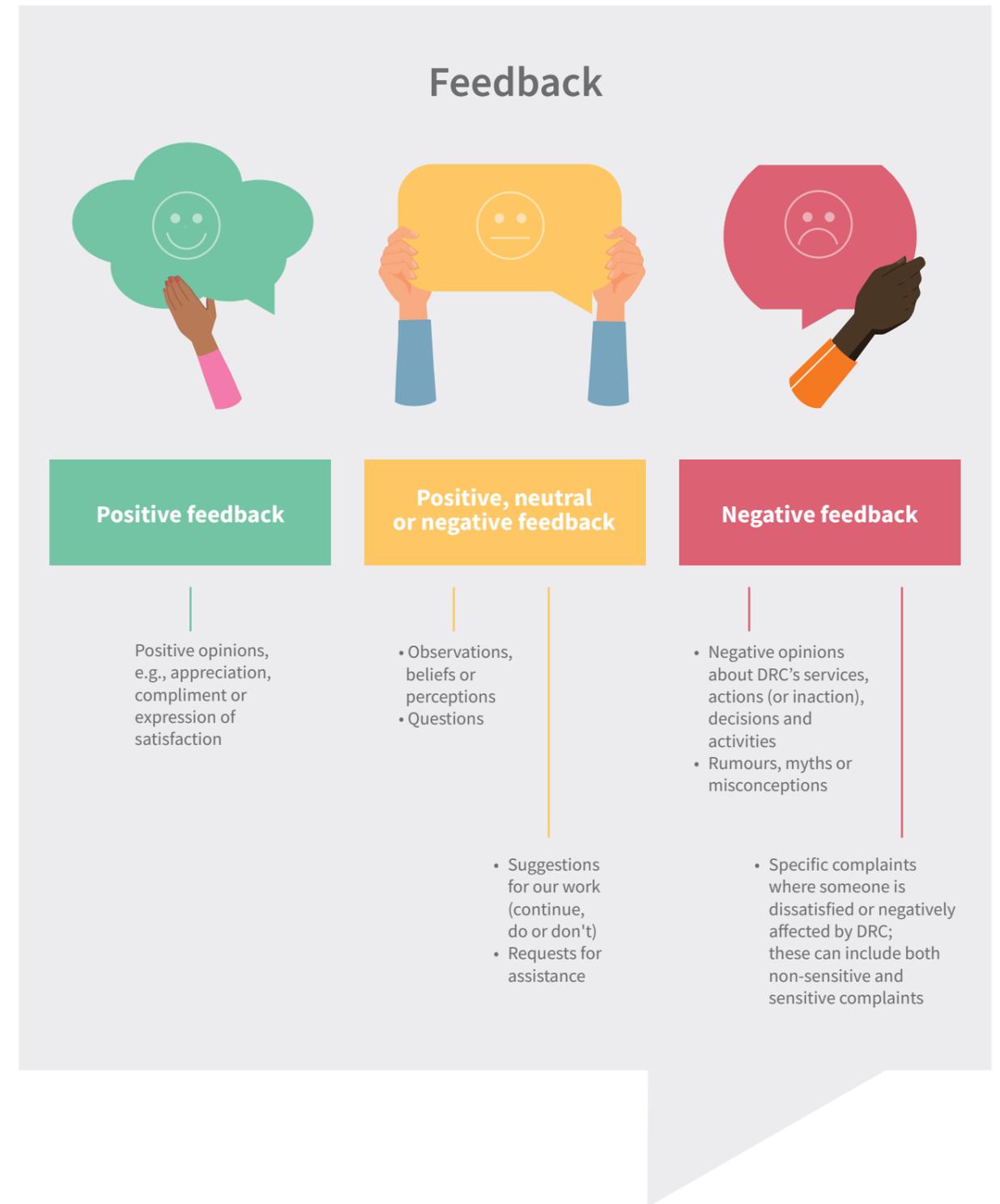
- Statements of **opinion** about our programming or the behaviour of DRC staff and representatives. An opinion is a judgement, viewpoint or statement based on one's understanding, experience, feelings, beliefs or desires. This can include expressing satisfaction, such as appreciation or a compliment, or negative views about a product, service or activity.
- Specific **complaints** of anyone dissatisfied or negatively affected by DRC's actions or who believes that DRC has failed to meet a stated commitment
- **Questions** about DRC, our services or other requests for information
- **Requests** for assistance
- **Suggestions** on how to conduct our work, these can be positive, neutral or negative (e.g., continue, do or don't)
- **Observations** reported to DRC about what one has seen, heard or noticed
- **Beliefs or perceptions** of affected people based on one's convictions and cultural or personal values
- **Rumours, myths and/or misconceptions** that may be circulating in communities that can be harmful to DRC and others.

Feedback can come from different sources, both informally through interacting with project participants, or more formally through official CFM channels such as an information help desk or a phone hotline.<sup>72</sup>

Most feedback types, except for those pertaining to DRC's CoCRM, can be recorded and processed following established data protection practices. Overtime, this data can be extremely useful to the organisation, and can be utilised for operational or strategic changes or even advocacy purposes. Feedback can assist DRC in understanding community engagement and information gaps, assistance needs, programme deficiencies, protection issues, perceptions of DRC and/or other concerns arising within the community.

Positive feedback can be a compliment, appreciation or expression of satisfaction from communities. Neutral feedback may include questions, requests for assistance or general suggestions to incorporate into our work. Negative feedback may constitute negative rumours circulating within a community about DRC or other matters, or negative opinions about the services provided by DRC. It also encompasses more serious complaints where someone is dissatisfied or negatively affected by DRC. Complaints are specific grievances officially communicated that require a more formalised response and follow-up through a set of procedures as outlined in a CFM policy or framework.

**«Important» Feedback is a broader term also incorporating complaints and this overarching expression is used throughout this guidance document to refer to positive, neutral or negative feedback.**



72 Ibid., p4

## DRC distinguishes between non-sensitive and sensitive feedback

«**Non-sensitive feedback**» typically relates to the operational or programmatic undertakings of the organisation, e.g., opinions, questions, requests, suggestions, reports or complaints regarding the activities, services, processes or actions (or lack of action) of DRC and/or other humanitarian actors.

Non-sensitive feedback often captures concerns about the quality of programme delivery, the decisions taken or the policy and advocacy aspects of a project. It can usually be resolved with better information dissemination, community participation, staff training on protocols, minor administrative measures, programmatic changes, procurement revisions, additional resources, ongoing monitoring and/or knowledge of the programme, context, existing services or local actors.

«**Sensitive feedback**» any allegation related to serious violations of national or international law pertaining to the rights of the individual; any breach of the DRC Code of Conduct or Safeguarding policies; and/or safety and security threats targeting the humanitarian community.

## Sensitive feedback can be divided into the following

- **Protection concerns** – e.g., forced, denied or restricted movement, denial of liberty, denial of justice, denial of land and property, physical violence, sexual and gender-based violence (GBV), denial of civil and political rights, or any other form of violence, coercion, deliberate deprivation and abuse perpetrated by an authority, state actor or NSA, or another member of the community within a community.
- **Violations of DRC's Code of Conduct or Safeguarding Policies** by DRC staff or representatives as outlined on the previous page.
- **Allegations of serious misconduct by other humanitarian actors (non-DRC staff)** – e.g., United Nations (UN), international non-governmental organizations (INGOs), non-governmental organisations (NGOs) or other local humanitarian actors (breaches as per CoC bullet points outlined on the previous page).
- **Safety and security threats** either indirectly or directly targeting DRC and/or the humanitarian community.

Sensitive feedback involving complaints of misconduct of DRC staff will need to be handled according to relevant DRC CoCRM operational procedures, principles and minimum standards as well as corresponding internal policies such as DRC's Anti-Corruption, Safeguarding and Child Safeguarding policies. The DRC CoCRM functions internally within DRC to provide a safe, trusted, robust and confidential reporting mechanism for all DRC stakeholders, including staff, to report suspected misconduct.

«**Complaint**» is a specific grievance, negative reaction or viewpoint communicated by **anyone who has been negatively affected by an organisation's actions** or who believes that an organisation has failed to meet a stated commitment. It entails **an official notification of dissatisfaction** (verbal or written) about an organisation's performance that may require corrective action, response or investigation.<sup>73</sup>

Both feedback and complaints must be acknowledged and responded to, but complaints warrant a more formal response. A complaint is a form of feedback and may relate to the standards of DRC activities, services and actions (or lack of action) of its staff and representatives which also includes partner staff, volunteers, incentive workers, contractors, consultants, community committee members or anybody directly involved in the delivery of our work. A commitment should be made to pass on complaint outcomes and the person raising the complaint should be asked if they would like a direct follow-up. When there is a high volume of similar complaints being received, DRC may opt for a more targeted way of closing the loop with affected people via community meetings, social media, bulk SMS or email communications etc (where the matter is non-sensitive). DRC should be open and honest about what is possible and inform PoC about the means of communication to get back to them, where relevant.

### Sensitive feedback involving...

... **allegations of serious violations of national or international law pertaining to the rights of the individual may include any form of violence, coercion, deliberate deprivation and abuse** against girls, boys, women, men and people of all genders. It can be perpetrated by an authority, state actor or non-state actor (NSA), or another member of the community.

#### ... breaches of the DRC's CoC, or Safeguarding policies can include:

- Any form of exploitation, abuse or harassment (including sexual, physical, psychological and verbal) of communities by DRC staff or representatives
- Fraud, corruption, extortion and the misuse of project funds or materials
- Discrimination of community members on the basis of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status, or other diversity characteristics
- Lack of honesty and respectful professional and personal conduct (including not observing local laws, respecting confidentiality and/or safeguarding DRC resources)
- Failure of DRC to promote and protect people's safety, health, well-being and human rights.

**Any suspected misconduct involving a DRC staff member or representative must be immediately and directly reported to DRC's CoCRM.**

«**Important**» **All reports of suspected misconduct received through any community CFM channel must be immediately escalated to the CoCRM to allow the relevant intake committee to make a rapid determination of the matter.** The CoCRM is responsible for deciding whether to authorise investigations, and ensuring independent, thorough and impartial examining of allegations.

<sup>73</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p37

**Non-sensitive complaints may relate to the shortcomings in the performance of DRC's work and/or other humanitarian actors, examples that may be raised include:**

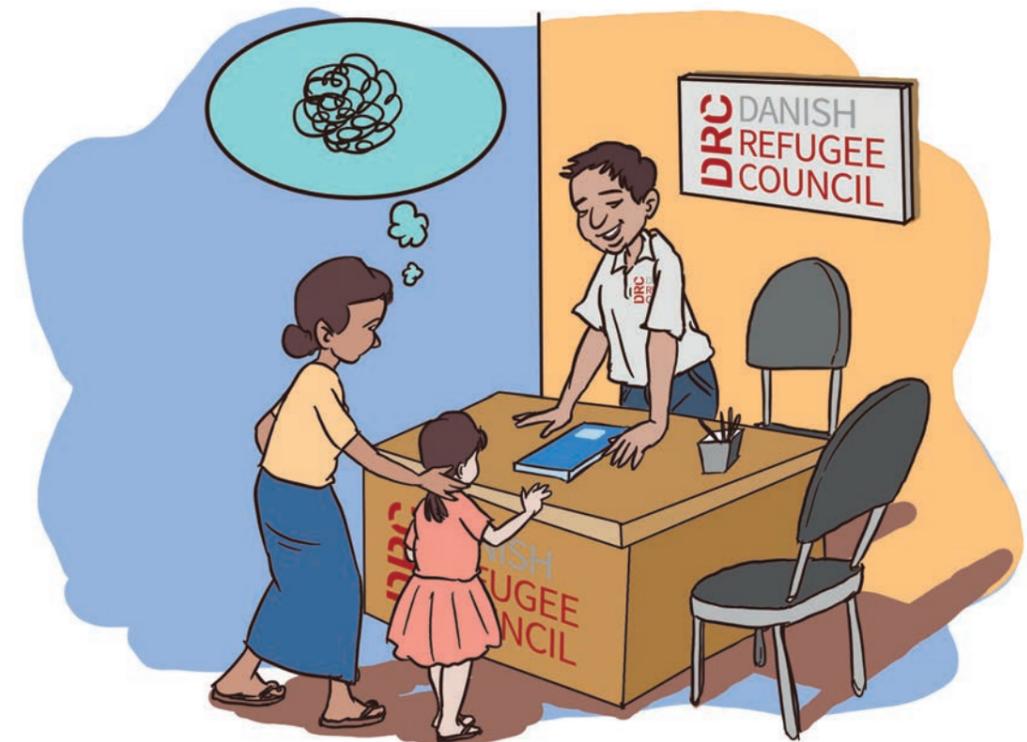
- Dissatisfaction with the quantity or quality of humanitarian assistance provided. This may relate to:
  - timeliness, accessibility, reliability, appropriateness, cleanliness, privacy, availability or overall non-fulfilment of DRC commitments
  - errors or drastic changes to the quantity or quality of assistance received
  - poor organisation, communication or planning of activities
  - concerns regarding selection criteria, registration, distributions, cash transfers or vouchers, and/or assessment findings
  - lack of information about services, upcoming activities or participation eligibility
  - absence of DRC personnel, or feedback and complaint channels during programme interventions
  - errors relating to the personal information of People of Concern.
- Issues in relation to DRC potentially doing harm e.g., resulting from the introduction of resources and transfer effects of assistance on conflict: such as changes to the local market, increased competition and prices, or reports of aid inadvertently strengthening armed actors.
- Partner or contractor dissatisfaction with agreements, general cooperation or communication with DRC.
- DRC staff attitudes or behaviour not classified as a sensitive complaint.
- Complaints about advocacy, DRC strategy or policy statements.

For complaints regarding the activities, actions and decisions of other humanitarian actors, DRC can only fully respond to the actions for which DRC is responsible, or to complaints within the control of the organisation. At the same time, DRC has a broader collective responsibility within the humanitarian community to ensure appropriate and timely referrals of non-DRC-related feedback raised in relation to other actors and agencies.<sup>74</sup> This must be done in accordance with a do-no-harm (DNH) and survivor-centred approach. This includes ensuring the well-being and wishes of the survivor of an incident are put at the centre of all actions taken with staff prioritising safe and confidential referrals and the protection of reporting persons from any potential risk of harm, abuse or stigma.

**«Consider»** using alternative and appropriate terminology for translations of the word 'complaint' to encourage other types of feedback. This might include using the broader term of 'feedback' only, or suggestions, concerns, community insights or ideas instead.

The use of the word 'complaint' may be extremely sensitive in some cultural contexts where it may be perceived as negative, or even unsafe to raise serious feedback, especially where there may already be very little trust in aid agencies, authorities, individuals and/or between different community groups. When translated into local languages a complaint may be understood in a confrontational way, which could jeopardise relations with authorities, communities, different actors and parties to a conflict. People may also fear that raising concerns will have negative repercussions on the provision of aid.

DRC has chosen to move away from the title of 'Feedback and Complaints Response Mechanism' to not deter people from coming forward, and to encourage affected people to share other types of feedback, beyond complaints. Think carefully about what to call the CFM and identify an appropriate term in the local language and context to account for the different attitudes and connotations related to sharing complaints or other types of feedback.



<sup>74</sup> Bond, *Eight Principles for Building trust through Feedback*, (Bond 2016), p7

«**Feedback channel**» also referred to as modalities or entry points (used interchangeably) are **the means through which an organisation decides how to formally collect feedback** managed by dedicated staff operating the CFM.

«**Feedback loop**» the cycle of **gathering feedback from crisis-affected populations, acknowledging this feedback, using this information to improve an organisation's work and then communicating a response back to communities about the actions taken to address it, which forms a 'loop' back to the complainant.**

Feedback channels should always be **context-specific** and selected based on the **appropriateness** for each project location, activity and the preferences and language of the target population. Examples of feedback channels include: feedback or information help desks, suggestion boxes, social media messaging, community committees, phone or text hotlines, and voice recorders. See more on **Page 70** which outlines the strengths and limitations of different feedback channels.

It is considered a feedback 'loop' because feedback collected from communities (considered as the outputs from the CFM system) about DRC's services or activities is used as constructive input for future operations and strategy.<sup>75</sup> The feedback loop benefits both people and communities affected by crisis and DRC. When the feedback loop is closed and affected people hear back from DRC, they have an opportunity to express whether they are satisfied with the actions taken and they can feel valued and respected. They will also be more likely to have increased confidence, trust and overall satisfaction with our work. Closing the feedback loop is essential to ensuring that DRC's work remains responsive, relevant and accountable.



<sup>75</sup> Adapted from: Bonino F., with Jean, I. and Knox Clarke, P. (2014) "Closing the Loop - Practitioner guidance on effective feedback mechanisms in humanitarian contexts." ALNAP-CDA Guidance. London: ALNAP/ODI



## The Why: why establish a Community Feedback Mechanism?

Establishing a CFM is a positive undertaking because when community feedback is used to inform our actions and decisions, it is a concrete way to be accountable to the people and communities we aim to assist. Managers and senior staff, in particular, should promote a culture where feedback and complaints are welcomed and addressed. Their support for the implementation of CFM systems is vital.

Providing a formalised structure to take into account the views, opinions, concerns, suggestions and complaints of affected populations is fundamentally about basic respect: providing an avenue for dialogue, participation and prioritising our duty to honour and be held accountable for stated commitments and basic humanitarian principles.

When effectively implemented, CFM systems can act as a marker as to how well DRC is faring in meeting other commitments of the CHS. They can indicate the impact and appropriateness of an intervention, potential risks, vulnerabilities and opportunities, as well as the degree to which a response is well-coordinated, and the satisfaction levels of the services provided.<sup>76</sup> Below is a summary of the main reasons why DRC encourages all country operations to set up CFM systems and many overlap to varying degrees.

### Protection and human rights

CFMs assist in promoting the well-being, rights and protection of people affected by crisis by offering people a platform to have a voice and be heard so that communities can hold organisations to account for any potential unintended harmful consequences. Our interventions may amplify existing unequal power relations or inequalities between different groups and/or between people of all genders, ages and abilities or other diversity factors. This may undermine fundamental human rights such as the right to life with dignity, and the right to protection and security as enshrined in International Human Rights Law and International Humanitarian Law (IHL). CFM systems can serve as a tool for people to report any rights abuses occurring within a community.

**«Important» Whilst their primary purpose is not to systematically collect instances of rights violations and protection risks within communities, these may be received through CFM systems, and they do play a role in identifying these and referring them as appropriate.**

The very nature of setting up and promoting CFM systems can significantly improve the general rights awareness and knowledge of the expected behaviour of DRC and partner staff amongst affected populations. This can increase their capacity to identify potential safety risks and enhance their understanding of the importance of reporting as well as where and how to safely report breaches of rights and safeguarding.<sup>77</sup>

**«Query (request for information)» asking a question or for information about a particular matter. This may be in relation to the services, activities or other actions of DRC, and/or the wider humanitarian system.**

Prior to proceeding with any referral process, DRC staff must seek informed consent from the complainant to be able to connect them to a relevant service. This requires gaining their permission to share their contact details and conducting the referral based on explaining as much information as possible about the service, any limitations, risks and benefits.

**«Referral» the process of directing a complainant to another service provider or actor because they require assistance that is outside the expertise or scope of DRC's work and direct influence to handle. The concerns raised may be of a sensitive or non-sensitive nature.**

DRC has a responsibility to manage referrals safely and confidentially and should utilise and maintain up-to-date service mapping lists in coordination with other actors. A referral can be made to a variety of services e.g., health; protection; nutrition; education; water, sanitation and hygiene (WASH); shelter or livelihoods. DRC staff should follow standardised inter-agency referral mechanisms, protocols and tools, where available, to adhere to consistent guidelines and agreed upon minimum standards.

**«Request for assistance» asking for support or specific humanitarian assistance, including financial, material, psychosocial, medical and protection.**

<sup>76</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p21

<sup>77</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), pxiii

### Participation, transparency and trust

If people are engaged from the outset through formalised feedback and complaint procedures, they have the opportunity to raise ideas, priorities, queries, needs, programming gaps, protection issues or other concerns arising within the community, which are systematically recorded, tracked, responded to and integrated into the response. CFMs can increase the influence of people affected by crisis and displacement by placing their views, needs and rights at the centre of our interventions, which can be an empowering exercise.

Participation should always be voluntary, representative, relevant and safe. It should also be meaningful, enabling affected people to decide whether, how and on which decisions they want to engage. As such, CFM systems should enable people's active involvement and influence in the CFM design, implementation, monitoring and evaluation processes. CFMs built on participatory methods can elicit important perceptions, experiences and ideas that are essential to generate effective and sustainable feedback mechanisms. They must also serve as an inclusive two-way continuous dialogue and not an extractive or one-off consultation or activity.

CFMs offer an opportunity for DRC to communicate more transparently and to be more responsive to the priorities of affected people. If we regularly create a space to openly share learning, mistakes, decisions and adjustments and close the feedback loop in a timely manner, we can increase the overall credibility of the CFM. This will mean that it is also more likely to be trusted and used, and therefore effective.

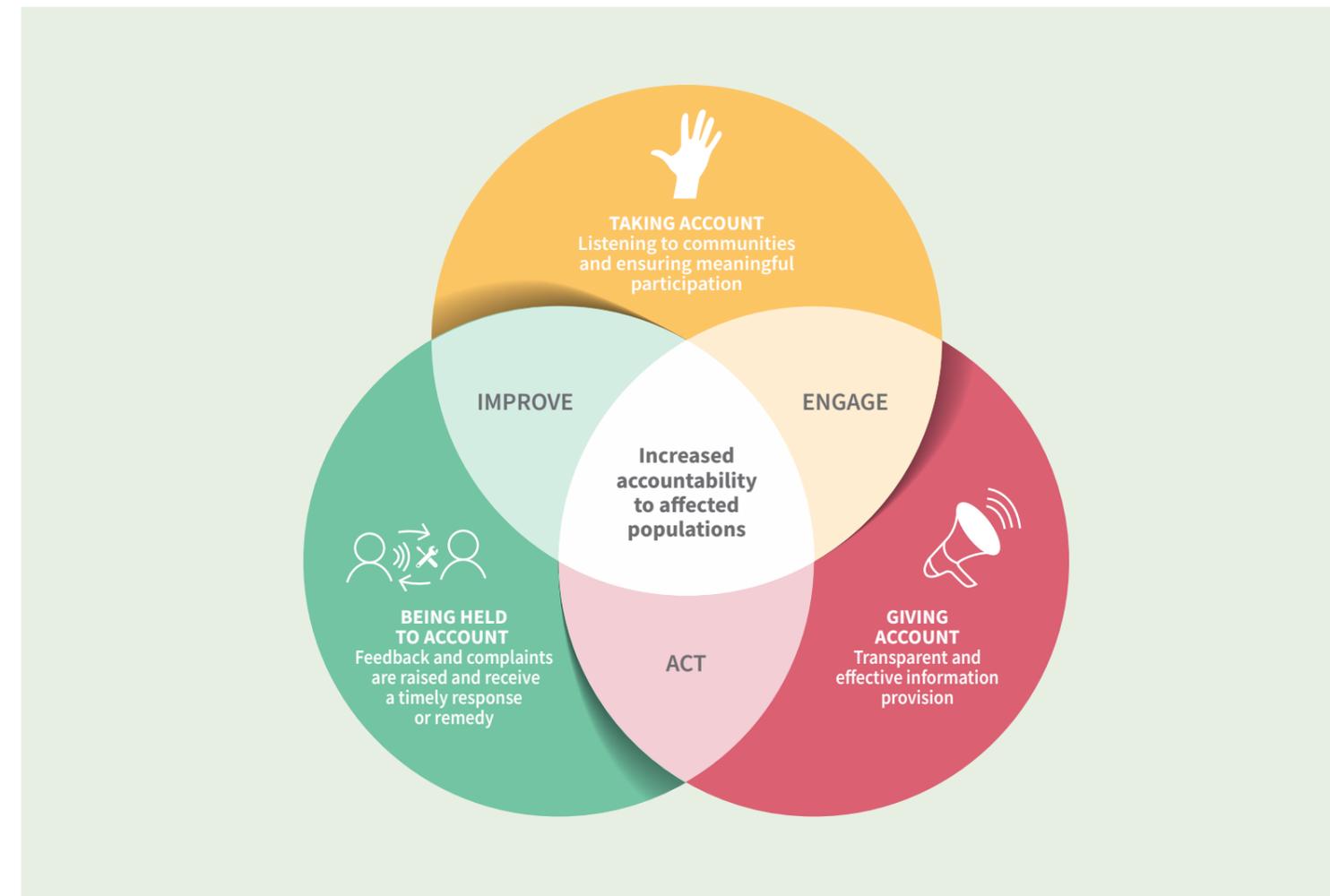
Additionally, an active commitment to transparency of all CFM processes and outcomes can enhance DRC's standing in the community, not only with PoC but with other stakeholders, including local authorities, donors and other actors.

### Accountability to Affected Populations

Ensuring operations are accountable to affected populations is a priority and an essential part of DRC humanitarian responses. DRC assists refugees and the displaced and works to protect and safeguard their rights and empower them towards a better future to realise our vision for a dignified life for all displaced. DRC is entrusted with power and resources to achieve this; therefore, **we are responsible** for our individual conduct, how we manage people, projects and resources, the decisions we make and the results of what we do. We must also **be answerable** for the impact of our decisions and actions and have a duty to explain, respond and remedy where stated promises or commitments are not met. At DRC, this is the core essence and idea of accountability: to take responsibility for, transparently explain and own our actions, decisions and conduct.

Accountability to Affected Populations (AAP) is also about the relationship between aid organisations and the people and communities we serve and the power dynamic that exists between them. Crisis-affected communities are rarely in a position to have control over the organisations that support them, nor the type of assistance they receive, at least initially. The Inter-agency Standing Committee (IASC) definition of AAP states that it is an active commitment of humanitarian actors to use power responsibly by:

- **Giving account to the community:** transparently and effectively sharing information with communities
- **Taking account of the community:** ensuring the rights and voices of affected people are valued, heard and that they have an opportunity to meaningfully participate in and influence relevant decisions affecting whether and how we work with them.
- **Being held to account by the community:** providing communities with the opportunity to assess the actions of humanitarian organisations, offer feedback and formally raise complaints.<sup>78</sup>



<sup>78</sup> Inter-agency Standing Committee, *Five Commitments to Accountability to Affected Populations*, (IASC n.d.), retrieved from this link (accessed December 2021)

As per the IASC definition, in the endeavour to support crisis-affected populations, DRC has a basic duty to share information about our work, our organisational commitments, project targets and progress, expected behaviour of staff and how to contact DRC if communities wish to share feedback or complaints. Sharing this information should go hand in hand with mainstreaming and promoting any CFM system, which, when done effectively, also allows DRC to listen to and respond to expressed needs or more serious grievances. However, AAP is more than just listening – it is also about the next step of humanitarian actors incorporating feedback into their programmes, strategies and the broader response – and continuously seeking the active participation of communities to empower them, whilst also improving interventions.

AAP is also about guaranteeing that populations have access to mechanisms to formally raise feedback and complaints, especially in relation to sexual exploitation, abuse and harassment by anyone associated with the provision of aid, which constitutes the most serious breach of accountability.<sup>79</sup>

**Therefore, an essential component of being accountable to affected populations is through the set-up of CFM systems as they encourage aid organisations to be transparent, responsive, rights-based and to take responsibility to remedy any shortcomings where stated promises or commitments are not met.**

### Programmatic learning and adaptive programming

Another key benefit of establishing CFM systems is the invaluable source of information they elicit directly from communities, which offers insight into the quality, relevance and appropriateness of assistance being provided as well as any potential effects of assistance on social and political dynamics, including conflict if it exists in the community. This can be used to learn and improve project management and outcomes, and to ensure conflict sensitivity.<sup>80</sup> The information shared may help identify programmatic mistakes or shortcomings, tensions or harm resulting from humanitarian interventions, and/or issues of serious misconduct of aid agency staff and representatives. They assist in creating a culture of ongoing learning to improve programming as an active process, instead of merely *after* the delivery of services and activities, and therefore strengthen the quality of our programming, including value for money.

When feedback is formally captured, considered and integrated into a response, e.g., through adaptive programming, it can dramatically improve overall acceptance and quality and increase impact within a community. For example, selection criteria can be improved through the identification of inclusion and exclusion errors; factors limiting access to services can be raised and minimised; agencies can be informed about any unintended harm or safety implications resulting from their actions and can adjust and mitigate these accordingly. CFMs can notify management of further resources required in the field, community engagement gaps, attitudes and behaviours of staff and/or general satisfaction levels, which, when appropriately addressed, can lead to improved services, sustainability and collaboration with people and communities affected by crisis.<sup>81</sup> DRC allows for adaptive programming in its project cycle management guidance.



### Risk management and early warning systems

CFMs can alert an organisation to existing tensions, indirect or direct threats, unsafe programming concerns or other safety and security issues surfacing within a community. With such knowledge, humanitarian agencies can act swiftly to protect PoC, staff and other stakeholders. In this way, they serve as an early warning mechanism revealing imminent risks before they escalate, become too large or unmanageable.

### Do-no-harm and conflict-sensitive programming

Feedback gathered through CFMs can inform about unintended negative effects of assistance, including the role of humanitarian assistance on conflict dynamics. Especially in politically difficult or conflict situations, the potential harm caused by insensitive operations or programming can be severe. When DRC establishes a presence in and introduces resources to a resource-scarce context, we may affect the power relations between groups in conflict, and CFMs can play a role in understanding our impact on the political or conflict context.

<sup>79</sup> Inter-agency Standing Committee, *Five Commitments to Accountability to Affected Populations*, (IASC n.d.), retrievable here (accessed December 2021)

<sup>80</sup> Bonino, F. and Warner, A., What makes humanitarian feedback mechanisms work? Literature review to support an ALNAP–CDA action research into humanitarian feedback mechanisms, (ALNAP/ODI 2014), p8

<sup>81</sup> Ibid.

DRC must therefore maintain a conflict sensitive approach and continuously seek to understand the interaction between the conflict context, our presence and our actions. This entails monitoring the impact of our behaviour (including recruitment and procurement practices) on relationships between local actors, what resources are provided, who is benefiting and whether aid is worsening inter-group divisions or reducing them.<sup>82</sup>

CFMs may elicit some of these effects, related to either implicit ethical messages (from staff communication and behaviour) or resource transfers. The latter include theft and diversion, where aid can be stolen or taxed by official or informal authorities or groups locally in positions of power, targeting and distribution concerns, negative impacts on local markets, or legitimisation and substitution impacts where INGO or NGO efforts may be exploited to legitimise conflict actors or free up duty bearers' resources for engaging in conflict.<sup>83</sup>

### Identification of staff misconduct

DRC believes that everyone we come into contact with regardless of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status or other attribute(s), has the right to be protected from all forms of harm, abuse, neglect and exploitation. DRC will not tolerate any abuse or exploitation by staff or associated personnel. DRC's commitment to safeguarding, which means protecting people's health, well-being and human rights, is enshrined in DRC's Global Policy on Safeguarding and Child Safeguarding as well as our CoCRM.

Whilst CFMs do not have the remit to directly address serious abuses of staff misconduct and should be set up separately to DRC's CoCRM complaint mechanism, they can help in identifying safeguarding breaches and facilitate the fast-tracking of referrals when alleged misconduct is disclosed. When promoted, CFMs act as a deterrent for any intentional misuse of power, as DRC staff and representatives know that anyone can identify misconduct and complain about them.

### The Scope: who do Community Feedback Mechanisms serve, where and what is their coverage?

A CFM system must have a clear purpose and scope in terms of who the mechanism serves, the types of feedback it will collect and respond to and in which locations, programmes or settings. It must take into account the staffing and overall resources available, safety of staff and communities, and logistical and access considerations.

In some contexts, or during certain stages of a response, DRC and other humanitarian actors may not have sufficient access to PoC to adequately set up a CFM mechanism. Certain situations may be temporarily too volatile or remote for DRC staff and partners to engage communities which present challenges to fully manage a responsive mechanism.

For example:

- there are ongoing security concerns, or no access, limiting DRC's ability to adequately follow up on feedback, or to thoroughly investigate reports of misconduct.
- the area is too remote with no other actors or available services to fulfil DRC's collective responsibility to refer complainants to access needed support.

**DRC staff are therefore encouraged to adopt a context-specific and conflict-sensitive approach and to only roll out formal CFM systems based on the DNH principle, prioritising safety, our ability to be fully accountable, and the appropriateness as per every single location, target population and project activity.**

Overall, DRC must make a deliberate effort to understand contextual challenges, safety risks, conflict dynamics or other political sensitivities to select where and how to roll-out CFM systems. DRC should also be honest and transparent about the feedback we can handle, services we can and cannot provide and/or refer as this will help manage community expectations and build trust.

### Who do Community Feedback Mechanisms serve (and where)?

Any person or community affected by DRC, or DRC partners' actions, decisions or policies can submit feedback and complaints through DRC's CFM systems. These might include:

- People of Concern: people and communities affected by crisis who directly or indirectly benefit and receive support or services from DRC or its partners
- DRC suppliers, contractors or sub-contractors
- Other institutions or their staff (authorities, other INGO, NGO or UN agencies, donors)
- DRC or partner staff and their representatives, including consultants, volunteers and incentive workers
- Other members of the general public.

Anyone living in an area where DRC is working can provide feedback and share concerns. The reporting person may not necessarily be subject to wrongdoing themselves but may simply wish to assist by bringing a matter to DRC's attention. DRC must therefore also welcome feedback from the broader community, as well as the people it directly assists, which will help us understand general community needs and concerns.

### What types of feedback should they cover?

The scope of a CFM is a decision for the country office to make, ideally by an internal Steering Committee (see **Step 2.2** Appoint a CFM Steering Committee) in line with available resources and with consideration to other pre-existing feedback and reporting mechanisms already established. A CFM should always be designed based on engagement with communities at the field level, so that it is adequately tailored to the local context for raising and managing grievances.<sup>84</sup>

As a general rule, CFMs should solicit and facilitate non-sensitive feedback, and should only ever refer, not directly handle sensitive feedback such as protection issues or reports of misconduct. Protection teams and services should handle all protection cases, and any reports of suspected misconduct should be managed directly by DRC's CoCRM, the formal complaints mechanism that allows recipients to confidentially report abuses of power.

**«Important» It is acknowledged that when promoting any CFM modality, regardless of the agreed-upon scope or setting, all types of feedback will inevitably be raised with DRC because communities will try to contact us about a variety of concerns where CFM mechanisms are present.**

<sup>82</sup> Danish Refugee Council, *Conflict Analysis Guidelines*, (DRC 2020), pp39-40

<sup>83</sup> Ibid.

<sup>84</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms* (PSEA), (IASC 2016), p36

DRC accepts that regardless of the intended scope of the mechanism, we must always prepare to adequately address all types of feedback, drawing on robust and effective referral procedures and be ready to adapt programming as needed.<sup>85</sup>

Examples of the scope of feedback that may be received through CFMs include:

- **Non-sensitive feedback** about the satisfaction levels, standards or impact of activities, services or actions (or lack of action) of DRC, partner staff, volunteers, contractors, consultants, community committee members or anyone directly involved in the delivery of our work.
- **Protection concerns** including reports of violence, coercion, deliberate deprivation and abuse against persons, groups and communities in the context of humanitarian crises.
- **Staff misconduct and safeguarding breaches** pertaining to DRC staff and representatives.
- Non-sensitive feedback (regarding programmatic activities), and/or sensitive feedback (such as staff misconduct and safeguarding breaches), **in relation to other humanitarian actors.**
- **Safety and security threats** either indirectly or directly targeting DRC and/or the humanitarian community.

DRC should therefore prepare the CFM to adequately deal with non-sensitive and sensitive feedback (related to DRC as well as other actors) to be truly accountable to affected populations and build trust and confidence in DRC, the broader humanitarian system and the CFM itself. CFMs must be designed to fast-track the referral of any incoming

sensitive feedback, including protection issues and reports of SEAH and other forms of staff misconduct, to the appropriate identified entities responsible for follow-up. All staff need to be trained on how to deal with sensitive complaints in line with established CFM procedures and existing internal and external referral pathways and protocols.

**«DRC's Code of Conduct Reporting Mechanism»** *Within DRC, the CoCRM is the dedicated separate, confidential and safe mechanism for receiving and handling sensitive complaints pertaining to SEAH and/or other forms of serious staff misconduct. All reports of suspected misconduct received through any formal community CFM channel (or informally to any staff member) must be immediately referred to the CoCRM.*

DRC MEAL/Accountability teams, Protection and Code of Conduct staff must work together to agree on which feedback channels they will promote to the community as the most appropriate for that context, as not all channels will be accessible by community members. They must also outline procedures to ensure that any serious reports of misconduct shared via the CFM can be immediately and confidentially referred to the CoCRM for appropriate action. It is possible to concurrently promote the CoCRM channels to report serious abuses of misconduct directly there using the same sensitisation materials of the CFM.

If there is an existing inter-agency CFM in place, DRC should try to align and integrate its CFM mechanism with the inter-agency system where resources permit and it is deemed safe and more efficient by the country operation to do so. All principles and suggested procedures for managing non-sensitive and sensitive feedback outlined in these guidelines still apply and must be considered when deciding to harmonise efforts as part of a pre-existing inter-agency mechanism. DRC will officially only be able to handle and resolve matters under DRC's direct influence.

#### Issues not covered by DRC and partner CFMs

- **Feedback or complaints about matters unrelated to DRC.** Any feedback received via the CFM about matters unrelated to DRC must be safely and confidentially referred (only when consent is provided) via established in-country referral pathways. The CFM cannot directly resolve issues pertaining to local authorities, NSAs, other humanitarian agencies or stakeholders.
- **Feedback or complaints regarding the interpretation of DRC's terms of employment.** All internal employment conditions like the salary level, performance evaluations and assigned duty station will not be handled within the CFM system but should be addressed in a dialogue between staff and their immediate superior and/or the respective Human Resources (HR) department.
- **Feedback or complaints regarding performance management or minor disagreements between staff.** This guidance does not cover grievances relating to staff performance and/or non-sensitive interpersonal conflict between staff. Staff are encouraged to raise such matters informally (face-to-face) directly with the person(s) involved. If this is not possible, or the person is not comfortable doing so, the staff member shall seek support from their line manager or the HR Department to resolve minor disputes.

#### Considerations to guide incoming feedback

- **Anonymous feedback is accepted, however, DRC may be limited in our ability to respond.** DRC recognises that, at times, people affected by crisis and displacement choose not to, or cannot, report concerns for a myriad of reasons and may wish to lodge feedback without revealing their identity. Anonymous reporting can encourage individuals to report at a time and place they feel comfortable and safe with, which allows DRC to record incidents that may otherwise not be reported. This can help identify specific issues and bring about targeted responses. However, it also limits DRC's ability to respond to the complainant directly to clarify information and communicate progress, support options and outcomes. For this reason, DRC encourages reporting persons to identify themselves as far as the situation allows.
- **DRC will not approve of feedback that is directly harmful.** This includes threats, violence, offensive language, or accusations inflicting emotional harm or distress on a specific individual, or group of people. Whilst DRC encourages freedom of speech and the right of staff and communities to express unpopular points of view, CFMs must also never accept hate speech. Hate speech refers to content that promotes violence against or has the primary purpose of inciting hatred against individuals or groups, based on certain attributes.

<sup>85</sup> Bonino, F. and Warner, A., What makes humanitarian feedback mechanisms work? Literature review to support an ALNAP-CDA action research into humanitarian feedback mechanisms, (ALNAP/ODI 2014), p11

## A practical framework: best practice principles to guide your set-up

### Commitment 5 of the Core Humanitarian Standard

Any feedback and complaint response mechanism developed by DRC should adhere to the framework and associated indicators of Commitment 5 of the Core Humanitarian Standard (CHS), which states: “**Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints**”. DRC’s approach to setting up CFM systems in this guidance is underpinned by the Key Actions and Organisational Responsibilities as outlined within the CHS, the humanitarian sector’s common reference for describing the essential elements of principled, accountable and high-quality humanitarian action.<sup>86</sup>

The performance indicators under Commitment 5 of the CHS are relevant to all sectors and contexts.<sup>87</sup> They enable the measurement of progress towards meeting the standard (or comparison across time) and aim to drive continuous learning and improvement in the quality and overall accountability of CFM systems. For CFM systems to be genuine and effective, the intended users must know about the system, be able to access it in a variety of modalities safely and easily, trust in the confidentiality of procedures and receive timely responses. DRC encourages staff to incorporate the below criterion and indicators, as per Commitment 5 of the CHS, within the design and monitoring and evaluation strategy of any CFM, namely:

**Quality criterion: Complaints are welcome and addressed.**

**Performance indicator 1:** Communities and people affected by crisis, including vulnerable and marginalised groups, **are aware** of complaints mechanisms established for their use.

**Performance indicator 2:** Communities and people affected by crisis, consider the complaints mechanisms **accessible, effective, confidential and safe**.

**Performance indicator 3:** Complaints are **investigated, resolved and results fed back** to the complainant **within the stated time frame**.

The geographical, social, political and cultural contexts within which DRC operates are vast and varied. It is critical that DRC establishes CFMs with consideration to this contextual diversity and according to community needs and preferences or the CFM may be ineffective and at worst do harm to individuals using the system, not least to DRC’s reputation and acceptance within communities. However, regardless of the context, there are key principles DRC staff need to follow when setting up CFM systems in order to guarantee that they are accessible, safe, meaningful and effective.

The principles outlined below draw on the guidance notes of Commitment 5 of the CHS and may overlap; however, they are all equally important. The principles aim to provide a practical framework for the establishment of people-centred, rights-based and accountable community feedback mechanisms to be applied in any context, capable of building a safe environment where safeguarding concerns, within the context of programme work, can also be raised.<sup>88</sup>

### Human rights-based approach

DRC believes in the equal rights of all human beings and adopts a rights-based approach (RBA) to its work, which means that humanitarian assistance is based on internationally recognised human rights standards to promote and protect the inherent equal worth of all human beings.<sup>89</sup> DRC therefore aims to provide assistance without discrimination of any kind, promotes opportunities for the full and meaningful participation of the people we serve and works to reduce any barriers and disparities where identified groups of people may be left behind.<sup>90</sup>

When establishing CFMs, DRC can empower PoC (**rights-holders**) to know about and claim their rights; and increase the ability and accountability of individuals and institutions (**duty-bearers**) who are responsible for respecting (not violating), protecting (preventing violations) and fulfilling (instituting laws, policies and measures) rights. In addition to the elements described in the CHS, the principles below draw on fundamental rights-based principles, and all are critical elements to setting up effective, people-centred and robust feedback and complaints handling systems.<sup>91</sup>



<sup>86</sup> CHS Alliance et al, Core Humanitarian Standard, (CHS Alliance, The Sphere Project, Group URD 2021), retrieved here, p2 (accessed December 2021)

<sup>87</sup> The indicators and requirements outlined within Commitment 4 of the CHS is also equally relevant here, however Commitment 5 is the major area of weakness for DRC, and thus highlighted.

<sup>88</sup> Bond, *Eight Principles for Building trust through Feedback*, (Bond 2016), p3

<sup>89</sup> United Nations Sustainable Development Group, *Chronology of UN Milestones for Human Rights and Development*, (UNSDG 2021), retrieved from this link (accessed December 2021)

<sup>90</sup> United Nations Sustainable Development Group, *Human Rights-Based Approach*, (UNSDG 2021), retrieved from this link (accessed December 2021)

<sup>91</sup> International Organisation for Migration, *Rights-based approach to programming*, (IOM 2015), retrieved here, p19 (accessed December 2021)

## Principles for setting up effective, people-centred and robust CFMs



«**Accessible and inclusive**» the CFM system is available to be used by as many people as possible, having proactively incorporated access measures for vulnerable groups and diversity within communities, thus accounting for everyone regardless of age, gender, race, ability or other diversity characteristics. This will ensure that everyone within a community has an equal opportunity and ability to raise feedback and complaints and seek a response or redress.

Further, feedback channels are offered in a variety of locally preferred modalities that prioritise safety and confidentiality. Information on how to access the CFM is provided in a variety of formats, and the purpose, scope, procedures and response processes are transparent.<sup>92</sup>

«**Appropriately resourced**» in order to successfully design, implement and manage a CFM, DRC country operations need to invest appropriate resources. Resources both in terms of physical infrastructure (phone hotlines, information and communications technology (ICT), printing materials, etc), but also significant investments in staffing and training across all field locations to be able to adequately manage and oversee the roll-out of the mechanism.

DRC country offices can put aside a proportion of project budget lines specifically for CFM mechanisms.<sup>94</sup> Depending on the availability of resources, more extensive feedback mechanisms may not be feasible.

«**Age, gender and diversity appropriate**» crisis-affected populations served by DRC are numerous and diverse. Within a population, affected people experience displacement differently. The CFM should identify and address the different experiences of diverse groups that make up an affected population in order to maximise participation for everyone equally.<sup>93</sup>

The CFM should adequately serve and account for the diversity of needs, risks, vulnerabilities, preferences and capacities of different groups, which include people regardless of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status or other diversity characteristics.

DRC must also acknowledge that in each specific context, patterns of discrimination, power and exclusion are dynamic and the experiences of people across diversity factors is not uniform and may intersect and change, causing some individuals to face even more risks at different times.

«**Collective responsibility**» as a humanitarian sector, we share similar values, principles, and objectives, as well as a reputation. AAP is also about going 'beyond' the individual brand of the organisation and recognising that our position of power obliges us to share responsibility for creating safe, respectful and responsive interventions collectively.

Accordingly, establishing referral systems to appropriately and timely refer feedback not only within DRC, but with other humanitarian actors, is critical to giving a voice to those with less power than our own, or those negatively affected by our actions. Where formalised referral pathways and coordination mechanisms are not in place, DRC should prepare the CFM to adequately deal with all types of feedback based on our knowledge of existing services and the expertise of other actors.<sup>95</sup> The best interests of communities are served when agencies and service providers work together to provide holistic care.

<sup>92</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p29

<sup>93</sup> Danish Refugee Council, *Age, Gender and Diversity Mainstreaming Policy*, (DRC 2020), p3

<sup>94</sup> Bond, *Eight Principles for Building trust through Feedback*, (Bond 2016), p9

<sup>95</sup> Ibid., p7

<p><b>«Confidential»</b> the CFM must restrict access to the data it collects and limit sharing of such data. The CFM aims to protect the complainant and their personal information and create a safe environment to submit feedback.</p>	<p><b>«Conflict-sensitive»</b> the way the CFM is established and implemented should not contribute to or exacerbate conflict. It should draw on an understanding of the causes, actors and existing dynamics of a conflict in the specific area (i.e., conflict analysis) and utilise this in the design of the mechanism in order to minimise negative impacts and maximise opportunities for positive impact.<sup>96</sup></p>	<p><b>«Responsive (closing the loop)»</b> any CFM mechanism is more likely to be successful and trusted if it has well-established procedures for closing the feedback loop on concerns raised, within agreed time frames. This requires a commitment to transparency and fair and frequent communication about processes, decisions and outcomes. The credibility of CFM systems is reinforced by people's consistent experience of confidentiality being maintained, a timely response and an effective and transparent follow-up process respecting the rights, needs and wishes of the complainant at all stages.</p>	<p><b>«Safe»</b> the CFM considers potential dangers and risks to communities and incorporates measures to reduce injury and harm. It offers physical protection, privacy and safe options and processes for reporting concerns. Communities understand how to safely access CFM systems, their scope and the procedures required to respond to issues raised. DRC must also guarantee how it will close the loop and report back to complainants on actions taken. It is critical to respect complainants' wishes and to protect their privacy so that information is not disclosed without informed consent or the risk of identifying reporting individuals, thereby minimising the risk of retaliation.<sup>100</sup></p>
<p><b>«Context-specific»</b> the CFM must be designed as appropriate to the local context, with consideration given to social, cultural and gender norms that may affect reporting. All feedback channels, information, education and communication (IEC) materials and the overall design of the CFM should be chosen based on consultations with the intended users.</p> <p>Any CFM must acknowledge that communities are not identical, and that diversity and power disparities exist within any cultural group. Our CFM systems should take this into account in the planning and execution to minimise harm and maximise participation of everyone equally.<sup>97</sup></p>	<p><b>«Do-no-harm»</b> mechanisms for receiving feedback are an intervention in themselves that can elicit highly sensitive information. DRC must aim to avoid exposing communities to any harm throughout the process of establishing CFM systems by thoroughly understanding the conflict dynamics, risks, vulnerabilities, needs and preferences of communities. DRC can design mechanisms based on this knowledge to prioritise data protection, safety, confidentiality, non-discrimination and responsiveness.<sup>98</sup></p>	<p><b>«Survivor-centred»</b> the CFM must be designed to prioritise the well-being, rights and wishes of the survivor of an incident, ensuring that these are respected and placed at the centre of all actions taken. This approach helps create a supportive environment to promote a survivor's recovery, and their ability to express their needs, as well as to reinforce their capacity to make decisions about possible interventions. All CFM systems need to ensure that staff are trained to treat survivors with the utmost empathy, dignity, honesty and respect.<sup>101</sup></p>	<p><b>«Transparent»</b> members of the affected population are informed about what a CFM is, how it can be used and how feedback raised will be managed and followed up and within which time frames. Information about the mechanism should be easily visible, accessible, available in multiple formats and frequently communicated. DRC must always strive to be open and honest about what we do, the choices we make and the results of our work.</p>
<p><b>«Impartial»</b> CFM systems need to provide assurances that the issues raised are reviewed thoroughly and with impartiality, meaning that decisions made to resolve feedback and complaints are not compromised by bias, prejudice, conflict of interest or the undue influence of others. This requires effort to earn the trust in the mechanism by transparently explaining how the system works, procedures for handling non-sensitive and sensitive complaints, how confidentiality is ensured and how complainants can expect to hear back about the actions taken by DRC.<sup>99</sup></p>	<p><b>«Participatory»</b> the first step to creating an effective, trusted and usable CFM system is by promoting the meaningful and representative participation of the affected communities the system is being designed for.</p> <p>Approaches to setting up CFM mechanisms should be assessed, designed and decided upon in consultation with the communities that make up an affected population. How and whether they participate should be decided upon with them. The level and extent of their participation may vary, but DRC should always aim to go beyond consultation exercises to seek people's active involvement in CFM processes and decision-making throughout all stages of the project cycle. Participation should always be voluntary, inclusive, relevant, confidential, safe and continuous.</p>		

96 Danish Refugee Council, *Conflict Analysis Guidelines* (Glossary), (DRC 2020), p7

97 Bond, *Eight Principles for Building trust through Feedback*, (Bond 2016), p4

98 Ibid., p8

99 Ibid.

100 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms* (PSEA), (IASC 2016), p29

101 Bond, 2018. Safeguarding Policy [word] Bond, United Kingdom, available here.



## Part 2: DRC's approach to designing and managing community feedback mechanisms

This section outlines all the necessary steps to consider when establishing a CFM system. The approach outlined is not meant to be a timeline, as many steps will continuously overlap throughout the lifetime of the mechanism. Users are encouraged to go straight to the sections that are the most relevant for them. The same guidelines and steps are applicable to partner organisations and may be used to support their work with feedback and complaints handling. All the tools referenced are summarised in **Part 3** of this guidance.

### PHASE

### 1

### DESIGNING A COMMUNITY FEEDBACK MECHANISM

#### Step 1 Listen first to understand: know your community and context

*The design: develop (and adapt) your  
Community Feedback Mechanism  
based on community preferences and  
contextual considerations*

The first step to creating an effective and context-specific CFM is through thorough and meaningful consultation of affected populations that the system is being designed for. This will help to improve people's ability to access the mechanism as it will be more in line with community needs.<sup>102</sup> Participation should also go beyond merely consultation activities and seek people's active involvement in all CFM processes as feasible throughout the entire project cycle. Corresponding policies and action plans on community engagement should also be in place, monitored and updated on a regular basis.

*Core Humanitarian Standard Key Action 5.1:  
Consult with communities and people affected  
by crisis on the design, implementation and  
monitoring of complaints-handling processes.*

*Core Humanitarian Standard Key Action 4.3:  
Ensure representation is inclusive, involving the  
participation and engagement of communities and  
people affected by crisis at all stages of the work.*

*Core Humanitarian Standard Key Action 4.6:  
Policies are in place for engaging communities and  
people affected by crisis, reflecting the priorities  
and risks they identify in all stages of the work.*

<sup>102</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p19



Consultations should target people who are directly and indirectly affected by a crisis, e.g., internally displaced people (IDPs) and host communities. They can also include a cross-section of current DRC staff members, especially those responsible for daily interaction with communities, who will understand the breadth of current projects, challenges and contextually appropriate approaches for the roll-out of the CFM. Stakeholder mapping and engagement with existing actors, especially national NGOs, community-based organisations (CBOs) and community structures is also critical to understanding current practices, lessons learned and opportunities for collaboration to limit duplication. It will also go a long way toward garnering the support and buy-in of local stakeholders for the implementation of the CFM.<sup>103</sup>

**«Important» Never operate or implement a CFM system without the approval of local authorities.<sup>104</sup>**

Approvals may be required from different levels of the host government, authorities, security actors (e.g., police or military), local leaders and other community structures, camp managers or committees, private business and civil society. Depending on the context, the CFM will have to work with the host government and authorities throughout the life of the mechanism, whether it be for permission to operate the CFM, security clearances or other official declarations so that staff may travel, or when the CFM receives an allegation against government staff. DRC staff must consider who in the community they require buy-in from and ensure that they are informed, and permission to operate the CFM is sought accordingly.

Where safe and appropriate to do so, authorities should be briefed and provided with information about why the CFM is needed. Regular meetings or awareness-raising activities with authorities to increase understanding of the CFM is important, especially as they may be naturally hesitant to embrace the CFM if it is considered to expose their staff to potential breaches of human rights and misconduct. The key to overcoming this is to establish a good working relationship and to be transparent about the CFM purpose, parameters, feedback channels, investigative procedures and promotion of the CFM within their territory. This will help convey the benefits of the system. Without an ongoing dialogue, DRC may receive ongoing resistance and pushback from local authorities. Establishing early buy-in from local actors and authorities is critical for the everyday smooth operation of the CFM and long-term sustainability of the system. As the CFM continues, government support can mean the difference between programmes being suspended or continuing during volatile security contexts, e.g., elections, protests, conflict or other.<sup>105</sup>

At the very least, identifying and then informing these stakeholders about the primary purpose of the CFM, namely, to continuously improve services and assistance provided by DRC and/or its partners, will assist DRC and partners to increase the overall acceptance of the mechanism and minimise the likelihood of doing harm. An example of a basic script to brief local authorities (and other actors) can be found in **Tool 1**.

**Tool 1 – Script to brief local authorities or other actors** provides an example of a script to sensitively brief and inform local authorities (or other relevant actors) about the purpose, scope, modalities and promotional activities of the CFM.

### Step 1.1 Plan for participation

It is crucial before setting up any feedback system to actively seek out opportunities for participation. DRC country offices must choose the level of participation that they can commit to within their existing structures, resources, staffing and current capacity. DRC should commit to the elements of participation below only as appropriate and where there is corresponding interest and uptake from communities. Participation, not just consultation with community members, is critical to ensure buy-in from affected people at the outset of the CFM establishment. The below spectrum outlines examples of participation and can be used as a basis to form a participation or community engagement plan within DRC CFM country operation guidelines and frameworks.<sup>106</sup>

<sup>103</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p12

<sup>104</sup> Ibid., p16

<sup>105</sup> Ibid.

<sup>106</sup> IAP2, *Spectrum of Public Participation*, (IAP2 2019), retrieved from this link (accessed December 2021)



**Participation spectrum to increase impact on Community Feedback Mechanism decision-making**

	<b>INFORM</b> 	<b>CONSULT</b> 	<b>INVOLVE</b> 	<b>COLLABORATE</b> 	<b>EMPOWER</b> 
<b>Participation goal</b>	<p><b>Provide accurate and timely information</b> to assist communities about the CFM purpose, scope, modalities, procedures and outcomes or solutions to concerns raised.</p>	<p><b>Obtain information from the community</b> to inform the design of the CFM, e.g., local comfort levels, existing structures and cultures for managing feedback and complaints, preferred feedback modalities and potential barriers for at-risk or marginalised groups to equally and safely access a CFM.</p>	<p><b>Work directly with the community throughout the project cycle</b> to ensure that communities can take part in all aspects of a CFM and that their concerns, needs and preferences are consistently understood and considered.</p>	<p><b>Partner with communities in all aspects of decision-making processes</b> including the CFM design, development of preferred solutions, and relevant actions for course correction.</p>	<p><b>Place decision-making and CFM strategy in the hands of people and communities affected by crisis.</b></p>
<b>Commitment to communities</b>	<p>We will inform you about what you can expect from DRC in terms of services, staff attitudes and behaviour, as well as what to do and where to go if you would like to raise feedback and complaints if we have failed to meet our stated commitments.<sup>107</sup></p>	<p>We will listen to and acknowledge community concerns, knowledge and preferences and utilise this input to influence the design of the CFM.</p>	<p>We will involve you in assessments, implementation and ongoing monitoring and evaluations of the CFM.</p> <p>We will work with you to ensure that your ongoing feedback is directly reflected in our work. We will transparently close the loop on how community feedback influenced course corrections and decision-making.</p>	<p>We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.</p>	<p>We will enable you to implement how and what you decide.</p>
<b>Example tools</b>	<ul style="list-style-type: none"> <li>• CFM information campaigns, e.g., walk-throughs, movies</li> <li>• Leaflets</li> <li>• Factsheets</li> <li>• Business cards</li> <li>• Websites and social media</li> <li>• SMS, Viber or WhatsApp messaging</li> <li>• Posters and noticeboards</li> <li>• Radio</li> <li>• Audio or video clips</li> <li>• Drama performances</li> <li>• Community information briefing sessions</li> </ul>	<ul style="list-style-type: none"> <li>• Focus group discussions (FGDs)</li> <li>• Key Informant Interviews (KIIs)</li> <li>• Consultation surveys</li> <li>• Community meetings</li> <li>• Meetings with local partners and specialised local humanitarian actors, e.g. People with a Disability (PWD)</li> </ul>	<ul style="list-style-type: none"> <li>• Set-up of context-specific feedback modalities, e.g., phone hotlines, help-desks, community meetings, SMS, email, complaints boxes, online forms, etc.</li> <li>• Invite and train People of Concern to conduct CFM participatory assessments, monitoring and evaluation exercises</li> <li>• Conduct CFM monthly community meetings (co-led with communities) to share feedback trends, analysis, actions taken and any pending issues</li> </ul>	<ul style="list-style-type: none"> <li>• Community advisory or steering committees</li> <li>• Monthly CFM meetings to facilitate participatory decision-making</li> <li>• Involvement of local leaders and/or other community representatives</li> </ul>	<ul style="list-style-type: none"> <li>• Community-driven CFM committees</li> <li>• Delegated decisions via local representatives or other respected community leaders or partners</li> </ul>

<sup>107</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p20

DRC staff should include a section devoted to community participation in standard operating procedures (SOPs), action plans and CFM guidelines drawing on the participation spectrum and tools presented. As is relevant, safe and feasible for the context, DRC should always encourage people's active involvement in CFM processes and decision-making. The primary way of finding out the most appropriate modalities and preferred design of the system is to prioritise spending time with communities, building trust and relationships and embedding opportunities in the project cycle to routinely listen and promote participation.

DRC must be cautious about being too dependent on one or two community leaders who may not necessarily share, advocate or be aware of the unique perspectives, priorities and diversity that exists within the whole population across age, gender and diversity factors. However, they are still important to engage and failing to do so may result in a lack of acceptance of the CFM system.

**«Important» Where community-driven CFM committees are set up, DRC must take extra care to mitigate the risk of confidentiality breaches and harm to complainants. Such committees can present risks if sensitive information is exposed to multiple community members, and this is of particular concern where cases of misconduct may be reported.**

The number of committee members should therefore be limited and they should sign privacy statements and be extremely well trained on safeguarding, protection, Protection from Sexual Exploitation, Abuse and Harassment (PSEAH), basic CFM principles and confidentiality. This model may work more effectively if implemented by local partners.

### Step 1.2 Understand your context: know community preferences, needs, risks and sensitivities

#### Rapid Needs Assessment

DRC staff must seek to understand and document community preferences, needs, risks, information ecosystems and other contextual sensitivities. Affected communities and other stakeholders (including staff and groups who might be particularly at-risk) should be consulted about:

- Traditional methods and the local culture for dealing with feedback and complaints
- How they view feedback and complaint mechanisms
- The preferred ways in which they would like to submit feedback to DRC and any perceived risks or dangers in doing so
- What might potentially prevent them from complaining or accessing the CFM (the barriers also especially for any identified vulnerable groups)
- How they would like to be involved in the CFM process throughout the project cycle
- How they wish to receive feedback about the outcomes and actions taken about issues raised.<sup>108</sup>

This information can be obtained by conducting FGDs, KIIs, community meetings and or consultation surveys with communities – including with CBOs who might be specialised in working with more at-risk community members. DRC staff should be aware that there are differences in these methods and their use should be considered to best fit the context. FGDs and community meetings are a better opportunity for us to listen, while KIIs and surveys narrow our perspective through the questions we ask. As an example, see **Tool 2** which offers a template for conducting a CFM rapid assessment.



**Tool 2 – Rapid Assessment Feedback Questionnaire** provides an example template for how to conduct a CFM consultation with communities.

Instructions and training should be provided to staff conducting consultation activities to make sure questions asked are done so in a sensitive manner respecting local customs (e.g., appropriate phrasing of questions and/or separate FGDs for different genders and age groups). Staff must always gain informed consent before collecting such data. The information collected should be used to select the feedback channels relevant for that specific location and project activity, with documentation in CFM guidelines as to why they were chosen, and whom they are intended to serve.

108 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p19

## EXAMPLE FROM THE FIELD



### DRC Sudan: always test your assumptions in the design phase

A rapid CFM community-needs assessment was undertaken in an internally displaced persons (IDP) camp in Zalingei, central Darfur, Sudan, hosting around 50,000 people. DRC staff facilitated separate FGDs with both women and men. Despite the staff's many assumptions about the preferred feedback channel of communities located in these camps, the majority of people surveyed shared how they preferred a complaints box over a phone hotline. Respondents stated that whilst phones are useful in that issues can be raised immediately, they would not be appropriate because most people in the camp did not own or have access to them. They were also not connected to electricity to be able to charge them and lacked available funds to recharge the credit. Some consulted also indicated that they would not feel safe using a phone in a camp because of fear of government surveillance, which could put them at risk. The previous INGO present in the camp had set up a phone hotline but it did not work as communities were not able to access it. It was also difficult to close the loop with those who did utilise this modality as phones were often shared, so there was little to no trust in the overall mechanism.

Complaint boxes were reported as the preferred feedback modality in this location. Communities by and large stated that they felt more satisfied by being able to physically lodge a complaint into a complaints box in person and by witnessing this being continually checked by dedicated DRC or partner staff. The CFM would not work if the community did not see that adequate efforts were being made to consistently monitor, respond to and act on issues raised.

If DRC were to adopt complaint boxes as a primary modality, communities requested DRC to demonstrate that the feedback received could be followed up on a regular basis and that the complaints boxes could be secured overnight. It was important to them that they were placed in a safe and private location to limit any potential barriers to providing feedback. Participants shared that the preferred way for DRC to contact them about the outcome of feedback would be in-person and/or via community meetings, and for sensitive issues to be shared via community groups or committees, or directly with the individuals involved. A phone would be more private for getting back to people on sensitive concerns raised, but this would be problematic given the lack of access to phones. Gender considerations were also important as females stated their preference to have females communicating with them on issues raised, and men to have male staff.

The community stated that they would welcome DRC reactivating a CFM in the camp and asked when they would hear from DRC again. Communities would be less likely to share sensitive issues, but more likely to if DRC could demonstrate a fair, safe and responsive system was in place.

### Information Needs Assessment

Understanding communication needs will require DRC to conduct a separate information needs assessment, if not already completed, to ascertain how people access information and prefer to communicate. This will help generate a picture of the local information ecosystem. DRC must be extremely cautious with the modalities it chooses to communicate with as well as the messaging of the CFM itself. Understanding local information ecosystems will require DRC to actively and continuously seek to understand:<sup>109</sup>

- The types of information people want to receive
- The currently known and trusted communication channels (how they are used and how information flows), literacy and languages to account for
- Identification of local media and reliability of telecommunications infrastructure
- How women, children, the elderly and identified marginalised and at-risk groups access information
- Level of technological literacy and access within communities
- What communication channels local actors and parties to a conflict own and use
- Any rumours, misinformation and propaganda circulating within communities.

**Tool 3 – Information Needs Assessment** provides an example questionnaire on how to conduct a community information needs assessment.

### Context Analyses

Before deciding on the design of the CFM, DRC should also assess the operational context to fully understand local actors, local capacities and approaches, as well as the political, economic, social and community dynamics. Ongoing analysis of the context and stakeholders is critical to adapt the CFM to changing needs, capacities, risks and situations.<sup>110</sup> A context analysis should always be completed within our country operations to understand the broader setting in which DRC is working. Usually, this information can already be obtained. Examples of common types of humanitarian context analyses CFM systems can draw on include stakeholder analyses and conflict analyses, joint needs assessments, situation analyses and data obtained as part of the DRC Core Analysis Framework.

Context analysis will assist in avoiding doing unintentional harm or exacerbating social tensions and identifying stakeholders in terms of their capacity, interests and influence as well as the relationships between them.<sup>111</sup> DRC country offices are therefore encouraged to discuss and consider the following questions to guide decisions about where and how to implement a CFM mechanism:

- What are the causes, actors and dynamics of a conflict in a given setting – and between which different groups?<sup>112</sup>
- Who are the current stakeholders in each location, their role, capacity and what is the interplay between them?
- Is there an existing CFM system, how is this operated and by whom?
- What are the potential risks, barriers and constraints in setting up CFM systems, e.g., level of access to the affected population, security issues or other risks associated with engaging with communities?

<sup>109</sup> Quintanilla, J., *Ten lessons on communicating with communities in complex emergencies*, (HPN 2015), retrieved via this link (accessed December 2021)

<sup>110</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p5

<sup>111</sup> International Rescue Committee, *Urban context analysis toolkit. Guidance Note for humanitarian practitioners*, (IIED 2017), p8, retrieved here

<sup>112</sup> Danish Refugee Council, *Conflict Analysis Guidelines (Glossary)*, (DRC 2020), p1

### CFMs in hard-to-reach areas

Active hostilities, violence and targeting of humanitarian personnel and restriction of movement can make it incredibly challenging to reach people affected by crisis in some settings. Some areas are completely inaccessible and the risks and security considerations of setting up a CFM must be understood. DRC can approach this by negotiating access and gaining acceptance. Affected people in volatile and dangerous environments have equal rights to accountable assistance and to provide feedback as those living in more stable areas; however, safety should never be jeopardised for anyone.<sup>113</sup>

**«Important» If a project is conducted in an insecure or hard-to-reach area, some feedback channels may not be appropriate and special consideration must always be given to ensure the safety of community members, particularly women and children, volunteers, partners and staff.**

Access constraints may present difficulties in promoting the CFM, safely receiving feedback and being able to adequately follow up to maintain responsiveness and trust. In these circumstances, DRC staff shall consider remote management and technological-based solutions as well as potential implementation through partners, or other local organisations or structures within civil society who may already have access (if not engaged already).

Trust and acceptance can be built through careful negotiations, delivering timely and quality aid and being able to effectively close the loop with communities. DRC's approach should be tailored to the context and evaluated on the basis of risks for the organisation, staff, partners and the population. Decisions on implementing a CFM should be made in-country and strongly consider DRC's ability to handle and respond to feedback adequately and safely.<sup>114</sup> Staff should also consult with separate and specific guidance on remote monitoring, accountability and evaluation practices for working in volatile environments, which is not within the scope of this CFM guidance.

### Step 1.3 Consider diversity and intersectionality: recognise diverse needs and capacities

Within a population in any given humanitarian crisis, not everyone will experience displacement in the same way, to the extent that people or groups of people may effectively be invisible to outside actors such as DRC.

**«Important» The needs of affected people should not be assumed but identified through assessments that engage communities in an ongoing discussion to draw out all perspectives, identify invisible people or groups to enable appropriate and inclusive responses.**

These assessment and analyses should be a process, and not a one-off. In this way, over time in-depth analysis can be undertaken.<sup>115</sup> CFM systems should be designed to be accessible and inclusive of the diversity within the target populations they seek to serve. They must take account of the needs, risks, vulnerabilities, preferences, opportunities and capacities of different groups. Consideration should be given to how barriers to raising feedback can be overcome, whether these are physical, cultural, rooted in fear or a lack of awareness regarding the mechanism, confidentiality processes and the right to use it.<sup>116</sup>

Community consultations should be held separately with different groups where possible, e.g., with men and women, and PWD as per their preferences. It is important for DRC to identify specific at-risk groups who cannot easily participate and ensure that consultations are fully representative of the communities the mechanism covers. For example, particular attention should be given to alternative access modalities for people living with a disability. DRC should always consider all people equally regardless of race, ethnicity, gender, religion, age, ability, nationality, LGBTIQ+ status or other attributes.

**«Important» DRC must also acknowledge that in each specific context, patterns of discrimination, power and exclusion are dynamic and the experiences of people across diversity factors is not the same and may intersect, causing some individuals to be even more at risk.**

DRC can conduct consultations through ongoing programme activities and local structures, for example through local community centres, youth groups, women's committees or with case management clients (if appropriate). Once the dynamics of an affected population are understood, the full design of the CFM system and modalities can be decided upon. DRC staff have a responsibility to document and outline the modalities chosen for where, which activity, when and for whom. This will ensure a tailored approach for the CFM system, which is especially needed in contexts with significant cultural and linguistic diversity.

To apply the core principles of CFMs, e.g., safety, transparency, age, gender and diversity appropriateness, and accessibility, DRC staff should ensure that a full analysis of vulnerability is undertaken to identify avenues through which people of all genders, ages and diversity factors can safely share feedback. This may have already been undertaken as part of DRC's ongoing programming and the results should also inform the CFM. Such an assessment will assist in identifying the different and intersecting needs, vulnerabilities, capacities and coping strategies of diverse individuals and groups to address their current situation.

**Tool 4 – Rapid Gender and Intersectionality Analysis** is an example tool to understand the impact of conflict on power relations and norms in target populations and identify how programming (and the CFM) can better meet the needs of different (and/or invisible) groups.

<sup>113</sup> Danish Refugee Council, *Complaints Mechanism Handbook*, (DRC 2008), p17

<sup>114</sup> Persiani, M., *Accountability to Affected Populations in Limited to No-Access Zones*, (TECER, FAO 2021), p12

<sup>115</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p5

<sup>116</sup> *Ibid.*, p19



### Step 1.4 Context matters in the design: a road map to relevancy

The CFM procedures and feedback modalities should be designed to fit the requirements of each context, the different needs and preferences of communities, and consider the feasibility of joint feedback or complaints mechanisms with other agencies.<sup>117</sup> In some cases, the often utilised countrywide approach of a phone hotline, social media or email address may not be suitable for some locations, communities and projects where there is no access to phones, internet or mobile connectivity, low digital literacy and/or potential mass government surveillance. This is the case for many DRC country offices. Therefore, DRC must make a deliberate effort to design the CFM system based on the most appropriate communication modalities to meet the diverse needs of different groups and/or other conflict or political sensitivities.

Selecting and deciding on feedback channels should ideally always be undertaken by communities themselves, or at least in collaboration with them. Once information has been generated and verified as to what works for people of different ages, abilities and backgrounds, this should be documented in CFM SOPs and guidelines. Each feedback modality can be described as can why it was selected and whom it serves. This will demonstrate the contextual appropriateness and assist with the continual development of the system, allowing for reference back to original decisions made, what remains relevant and what does not.

**«Important» DRC should always aim to establish a variety of different feedback channels to increase the accessibility and inclusiveness of the mechanism. The channels should always incorporate face-to-face modalities, as regardless of the context, this is usually always the most preferred method of providing feedback. Hotlines alone are not the answer to ensuring that community voices and priorities are heard and incorporated.<sup>118</sup>**

DRC country offices should identify modalities that reflect the consultations, context analysis and feasibility of the local context. Feedback channels should be able to accommodate both individual and communal feedback. Examples of some groups that DRC will need to carefully consider are provided below.

#### Children and young people

To make the CFM accessible and safe for children and young people, DRC will need to design feedback channels based on their preferences. CFMs are often underutilised by children and young people because they are not intentionally designed with and for them; they are not adequately informed about their existence or how to use them; or the entry-points are not located in areas where they live or access services. Children and young people may also fear not being believed and/or that they may get into trouble if they speak up.<sup>119</sup> As a starting point, DRC should discuss CFM options with children and young people which will elicit ideas, inspiration and a better understanding of how to increase the proportion of feedback received from this target group.



Some general tips to create child and youth-friendly CFM systems are to:

- **Diversify your feedback channels:** adapt these after consulting with children and young people and carefully consider the needs of children with a disability and/or those with low literacy levels.
- **Utilise proactive feedback methods:** such as FGDs where DRC actively goes to children and young people to understand their perspectives. Hosting dedicated feedback sessions with carefully formulated questions and sitting with children and/or young people to discuss issues will help them to feel respected, heard and dignified.
- **Develop participatory feedback games:** this may include H-assessments, dot voting or dice question games such as 'dice-breaker' (example provided).<sup>120</sup>

The above sessions may focus solely on the programmatic aspects of DRC's work or more sensitive child safeguarding issues. If sensitive issues are to be discussed this should

always be led by a Child Protection or Safeguarding expert to minimise the risk of doing harm. All facilitators must be trained to observe and pick up on comments and behaviour of children and young people so that sensitive matters can be followed up during or after feedback sessions in a safe and confidential manner. All feedback received should be appropriately documented and addressed as per the guidance of the Child Protection specialists and in line with CFM procedures. For further advice on setting up CFMs with children and young people, including children with disabilities, staff are encouraged to consult stand-alone guidelines from Plan, Save the Children and UNICEF who offer a number of dedicated resources on the topic.

**Tool 5 – Dice-breaker Child Feedback Game SOP** is an example of a participatory game with questions to encourage children and/or young people to share feedback about their experiences, satisfaction levels and safety when engaging in DRC activities and services.

117 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p19

118 Van Praag, N., Ground Truth Solutions, 'Time to act on what affected people tell us about humanitarian hotlines', (GTS 2019), retrieved from this link (accessed December 2021)

119 Save the Children International, *Creating an Inclusive and Accessible Feedback and Reporting Mechanism Module 1*, (SCI 2020), p7

120 Ibid.



### People with a Disability

People with disability (PWD) already face many barriers to enjoying equal access and inclusion in society. Such barriers may be obvious such as physical ones – like objects or structures that prevent or block mobility and access, e.g., stairs that someone in a wheelchair cannot use. Communication is another one: anything that involves reading, writing, hearing, speaking and understanding. There are also less obvious barriers like societal attitudes and policies that lack awareness about PWD. When disaster strikes, PWD are especially vulnerable. DRC should always consult, consider and advocate for disability rights and needs in the design and implementation of CFMs.

### People on the move

DRC's Mixed Migration Centre (MMC) is a leading source for independent and high-quality data, research, analysis and expertise on mixed migration. Through a network of more than 120 monitors in over 20 countries, 4Mi – Mixed Migration Monitoring Mechanism Initiative – collects in-depth information directly from refugees and migrants on the move on a daily basis.<sup>121</sup> 4Mi has been developing a unique network of field monitors situated along frequently used routes and in major migratory hubs. These monitors conduct in-depth interviews with adult migrants and refugees on a continuous basis and are trained and closely supervised.<sup>122</sup>

121 The Mixed Migration Centre, *What is the Mixed Migration Centre*, (MMC 2021), retrievable via this link (accessed December 2021)

122 The Mixed Migration Centre, *What is 4mi*, (MMC 2021), retrievable via this link (accessed December 2021)

Data collectors send regular reports and interviews through remote mobile survey technology. This ongoing data collection is based on the actual, reported experiences of migrants. The journeys migrants take can be extremely dangerous, with risks of hunger, exploitation as well as potential exposure to smugglers or traffickers. The mobility of people on these routes presents challenges to effectively engage affected people in programme design and feedback mechanisms. Despite this, below are some ideas for how to increase engagement in CFMs with people on the move, especially those who agree to anonymously take part in interviews with data monitors:

- **Explain the purpose, scope and modalities of your CFM:** train data monitors to always brief and inform interviewees about their right to offer feedback and/or complaints about the interview process and how to do so
- **Develop scripts for data monitors:** add a mandatory briefing component about the feedback or complaint mechanism within the introduction section of the core survey (before seeking consent to continue)
- **IEC materials:** provide data monitors with IEC materials and information on the relevant feedback or complaints system and train them to hand these out to all interviewees whilst conducting surveys (where relevant and safe to do so)
- **Code of Conduct:** ask data monitors to sign the relevant Code of Conduct and also ensure they are aware of how to raise concerns themselves
- **Develop a services information sheet:** ask data monitors to share a services information sheet or online link so that migrants on the move have access to accurate information and assistance in their immediate locality or across neighbouring borders
- **Training:** train data monitors to identify needs and communicate cases that need to be referred for migrants to access needed services; additionally, ensure that they have access to the most updated referral mechanisms within their region.

## EXAMPLE FROM THE FIELD



### DRC Myanmar: the importance of taking your time to tailor your approach

In their preparations to set up a countrywide CFM system, DRC Myanmar conducted a pilot phase in several villages of Rakhine state. All villages for the pilot were selected based on agreed criteria, including where community consultations had previously been undertaken. In this way, the system could be adapted to the established information needs, preferences and other identified key contextual considerations. In all roll-out locations, government officials were informed about and provided approval for CFM activities.

Staff had to carefully develop a tailored roll-out plan given the breadth of programming, vast ethnically and linguistically diverse population within Rakhine state and the unique situation of each location, including whether there was active fighting, trust established with local authorities and whether DRC staff could obtain travel approvals. This was time and labour intensive, but the overall purpose was to minimise the risk of doing harm and to prioritise the appropriateness, accessibility and effectiveness of the CFM across the diversity within each location.

The roll-out plan was designed in collaboration with each sector team. The feedback modalities and IEC materials were tailored according to the appropriateness for every single location, language and corresponding project activity. For example, for locations where child protection activities were conducted, feedback games were developed with relevant staff to ensure that feedback from this age group was elicited in a safe manner. Corresponding SOPs were established so that all staff knew what to do if sensitive issues were raised. In some villages without connectivity or access to mobile phones, low literacy levels and where DRC did not have the linguistic capacity of staff to receive feedback via the phone hotline, DRC prioritised more face-to-face entry points such as help-desks and FGDs.

Verbal scripts using simple language were also used to disseminate key messages as oral communication was the identified most-trusted information source and some languages had no written form. This was done together with piloted visual aids such as cartoons to reinforce key message, designed by a local cartoonist. The field office decided to delay the CFM roll-out entirely in some locations until access could be granted, adequate bilingual staff could be found and/or other interim modalities explored to prioritise the integrity of the mechanism as a whole.

The table below offers a summary of some feedback channels that can be used as part of a CFM system. It is important that modalities are chosen based on the information obtained during consultations to ensure suitability to the local context. These can be presented and further discussed with communities in follow-up discussions.

If DRC decides to use channels that are dependent on the use of ICT approaches, whilst they are potentially useful in accessing hard-to-reach and remote communities, collecting real-time feedback and analysing large data sets, DRC must also carefully consider the risks. Some technologies may not be feasible or effective in each location and may also do harm and exclude those without access.

### Examples of feedback channels

MODALITY 	STRENGTHS 	LIMITATIONS 
<p><b>Face-to-face</b> <i>Tell it in person to a DRC staff member</i></p> <ul style="list-style-type: none"> <li>• <b>Suggestions or feedback ‘help desk’</b> to be operated by MEAL/CFM staff during key DRC activities, such as registrations, distributions and training</li> <li>• During DRC <b>community meetings and activities</b></li> <li>• <b>To any DRC staff member</b> when present within the community</li> </ul>	<ul style="list-style-type: none"> <li>• Data demonstrates that affected people significantly prefer face-to-face communication instead of other entry points<sup>123</sup></li> <li>• Can be mainstreamed into all DRC activities and public meetings</li> <li>• Communities can receive immediate responses regarding their concerns</li> <li>• People are assured that their concerns have been received</li> </ul>	<ul style="list-style-type: none"> <li>• Privacy may not be adequate for people to express their concerns during community meetings, or if the help desk is roving and public during implementation activities</li> <li>• Reluctance to criticise if People of Concern (PoC) are about to receive assistance</li> <li>• Relies on dedicated MEAL/CFM staff to record concerns and conduct referrals – there may not be enough dedicated (trained) accountability staff to manage help desks for the coverage needed</li> <li>• Location may be crowded and tensions high, thus reducing people’s desire to speak to DRC</li> <li>• Where sensitive concerns are disclosed to any DRC staff member in the field, they may not yet be equipped to safely and securely report Code of Conduct (CoC) or protection cases</li> </ul>
<p><b>Email</b> <i>Write an online mail</i></p>	<ul style="list-style-type: none"> <li>• Quick and easy to set up</li> <li>• Free</li> <li>• Allows staff to consolidate and rapidly refer concerns raised daily</li> </ul>	<ul style="list-style-type: none"> <li>• Not everyone has access to email, or can read or write</li> <li>• Language barriers</li> <li>• Connectivity issues</li> <li>• Perception that email may not be confidential or safe if government surveillance</li> <li>• CoCRM email may have to refer non-sensitive (programmatic) feedback and vice-versa if there is a MEAL/CFM email set up</li> </ul>
<p><b>Phone hotline, including WhatsApp or Viber</b> <i>Call or SMS an independent number</i></p> <ul style="list-style-type: none"> <li>• <b>Including combined</b> phone service, mobile SMS, WhatsApp or Viber text/voice messaging and calls</li> </ul>	<ul style="list-style-type: none"> <li>• PoC assured that their concerns have been received via an immediate verbal receipt of acknowledgement</li> <li>• PoC receive immediate information in relation to their feedback</li> <li>• WhatsApp or Viber is effective for engaging more young people if they have access to the application and internet</li> <li>• PoC can provide their contact information and request to be called back or have the choice to remain anonymous</li> <li>• Hotline is helpful for people who cannot or have difficulty to read or write</li> <li>• Text can be end to end encrypted to ensure confidentiality and anonymity</li> </ul>	<ul style="list-style-type: none"> <li>• A toll-free number is required and not always possible to set up in the country operation</li> <li>• May not be easy or comfortable for children to access</li> <li>• DRC must ensure that the hotline is adequately staffed at agreed times in multiple languages</li> <li>• If it is not a free service, costs may deter some users</li> <li>• It can exclude people without access to phones</li> </ul>

<sup>123</sup> Van Praag, N., Ground Truth Solutions, ‘Time to act on what affected people tell us about humanitarian hotlines’, (GTS 2019), retrieved from this link (accessed December 2021)

<p><b>Community committee</b> <i>Tell a representative</i></p>	<ul style="list-style-type: none"> <li>• Can be closer to different sections of the community</li> <li>• Encourages communication through local representatives</li> <li>• Promotes community ownership of the CFM</li> </ul>	<ul style="list-style-type: none"> <li>• Representatives may not consult thoroughly, which may create or contribute to disagreements or existing tensions</li> <li>• Representatives may take advantage of their power</li> <li>• Representatives may only represent one gender or group</li> <li>• Some community members may not trust the elected representatives and thus resist using the CFM; as a result, their voices may not be heard or considered</li> <li>• If there are many members on a community CFM committee, this raises confidentiality concerns if sensitive feedback is raised</li> </ul>
<p><b>Voice recorder or recording service</b> <i>Leave us a message</i></p>	<ul style="list-style-type: none"> <li>• Useful where many people cannot or have difficulty to read or write and there is a more oral culture of communication or languages have no written form</li> <li>• Helpful to reach remote areas or areas with little access</li> <li>• People can provide feedback 24 hours of the day – and communities feel satisfaction knowing they have been able to reach DRC</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic if there is little to no connectivity</li> <li>• Supply (of devices) may be insufficient and difficult to pass on to PoC if there are access constraints</li> <li>• Potential risks and exposure of sensitive cases if device is lost</li> <li>• Challenging if there are multiple languages to account for</li> <li>• Requires adequate human resources to manage incoming feedback: listening, transcribing, translating, entering data, referring concerns etc. (response rates may be slow)</li> <li>• Laborious process to download feedback can result in slow prioritisation of feedback</li> </ul>
<p><b>Feedback or complaints and suggestion box</b> <i>Write to DRC</i></p>	<ul style="list-style-type: none"> <li>• Complaints can be put in the box at any time (however, not overnight if secured location)</li> <li>• Enables children and women to make anonymous complaints</li> <li>• Because it is in writing, there can be less room for misinterpretation if enough detail is provided</li> <li>• If located in an indiscrete and secured space, this can provide PoC with a sense of privacy and safety</li> <li>• Sense of satisfaction and trust in being able to physically submit feedback</li> </ul>	<ul style="list-style-type: none"> <li>• Limited in confidentiality (even if people do not record their names with the feedback, they could be identified when submitting them)</li> <li>• Potential risk of vandalism</li> <li>• Inappropriate if most people cannot read or write</li> <li>• Users may not be provided with guidance on follow-up procedures while writing complaints</li> <li>• Requires regular collection and responses and this should be done by an independent department or entity when managing feedback</li> <li>• Details provided or handwriting may be indecipherable</li> </ul>
<p><b>QR code or online feedback form</b> <i>Complete an online form</i></p>	<ul style="list-style-type: none"> <li>• Effective to engage young people</li> <li>• Can be completed in private on individual devices with a sense of anonymity</li> <li>• PoC can provide their contact information if they wish and request to be contacted about their feedback</li> </ul>	<ul style="list-style-type: none"> <li>• Not all PoC have access to the internet</li> <li>• Language, digital access and literacy barriers</li> <li>• Perception that an online form may not be confidential</li> <li>• Inappropriate if most people cannot read or write</li> <li>• Data security concerns if utilising feedback forms with sources outside of DRC; and/or mass government surveillance.</li> </ul>

Where possible, multiple modalities should be selected to maximise accessibility and the inclusion of everyone within targeted populations so that people can reach the CFM equally. It is crucial for DRC to be creative and proactively think of new ways to 'go to' communities to be able to receive and record feedback, especially if usual

methods are not available or possible. Feedback collection methods can be **proactively** solicited using focus groups, community meetings, ongoing data collection activities, or **reactively** collected using suggestion boxes and hotlines. DRC staff should use a combination of both approaches and a summary of each type is outlined below.

### Reactive feedback channels

Reactive feedback is usually part of a formally managed CFM system that is mainstreamed across programmes. The feedback channels are promoted to communities during the provision of services to encourage feedback which is usually provided after one's experience with DRC.

- Allows people to raise feedback on their terms, when convenient for them, and through modalities of their choice. However, they are dependent on people feeling comfortable enough to come forward to raise concerns.
- Encourages people to raise feedback anonymously if they are concerned about their privacy, possible stigma or retribution.
- Provides an opportunity to raise broad feedback (both non-sensitive and sensitive) in a more direct and less public way.

**Examples:** suggestion/complaint boxes, hotlines, help desks during service provision e.g., at distributions, social media.

### Proactive feedback channels

Proactive feedback is actively solicited from communities, where DRC proactively goes to people affected by crisis, especially socially invisible people or groups, to document and consider their perspectives.

- Useful to reach more people and elicit more feedback when more passive channels such as a hotline or suggestion box are not appropriate. e.g., where people do not own phones, there is no connectivity or where there is no written form of communication.
- Helpful in targeting people less able or likely to offer feedback, such as children and young people or people with a disability, to help improve representation.
- Sends a message that the views of and needs of PoC matter and will be considered.<sup>124</sup>
- A culture of welcoming feedback is established if perception and other AAP questions form part of standardised ongoing data collection or Monitoring and Evaluation (M&E) efforts.

**Examples:** FGDs, community meetings, interviews, community visits/consultations, perception or satisfaction surveys, and any feedback collected through ongoing data collection or M&E activities.



### Step 1.5 Actively adapt: continue to listen and adapt the Community Feedback Mechanism to changing needs and circumstances

DRC country offices must continuously evaluate, reflect and actively adjust the set-up of the CFM. It is important to review the system in place by conducting regular monitoring of the mechanism and modalities. A CFM system is not and should not be stagnant, and the system, or parts of the system, should be updated and evaluated on a regular basis.

It is important to identify opportunities for community members to lead monitoring and evaluation activities and to also share results of evaluation findings during community meetings. Assessments of the CFM can be a stand-alone activity and embedded into the design of ongoing monitoring surveys as relevant, for example during

Post-Distribution Monitoring (PDM) questionnaires which enquire about the community's awareness of and trust in the CFM, accessibility and appropriateness of the modalities selected, as well as their overall satisfaction with the system if they have used it.

**«Important» We must try to understand if the mechanism is working, just like a programme or project, a feedback mechanism should be periodically reviewed and modified if necessary. It is a project in and of itself where regular monitoring and evaluations should take place.<sup>125</sup> More information on this is provided in Phase 3: Monitoring, evaluation and learning from feedback.**

<sup>124</sup> Start Network (Kahn, C), *Accountability, Feedback & Complaints Mechanisms: In Humanitarian Responses to Migration*, (Start Network 2020), p7

<sup>125</sup> Bonino, F. and Warner, A., *What makes humanitarian feedback mechanisms work? Literature review to support an ALNAP-CDA action research into humanitarian feedback mechanisms*, (ALNAP/ODI 2014), p20

## Step 2 Details matter: document and plan your structure, systems and staffing

**The framework: organisational planning, policy development and resources**

*Core Humanitarian Standard Organisational Responsibility 5.4: the complaints-handling process for communities and people affected by crisis is documented and in place. The process should cover programming, sexual exploitation and abuse, and other abuses of power.*

After consultations and context analyses are finalised, DRC will have a better understanding of what is required to set up the CFM, including: participation opportunities, the most appropriate feedback channels, staffing needs and other resources, contextual sensitivities and knowledge on the existing CFM systems of other actors. The next step is to plan and document what is feasible within existing (or planned) resources, staffing, access and other identified constraints.

From the outset, CFM systems must have detailed, thorough and unambiguous overarching procedures, SOPs, feedback loops and workflows. The entire system, roles, responsibilities and time frames for each category of feedback must be clearly indicated. Guidelines should also state which feedback type falls within DRC's own remit, and how and when to refer to other service providers. The commitment to resourcing dedicated staffing and CFM teams, as well as documenting

the structure for how different feedback categories should be managed is crucial for the ongoing success of the mechanism. Details matter: staff at all levels need to know how feedback should be handled, by whom, through agreed-upon processes that are clearly and simply documented. If DRC staff are unaware or unsure of internal procedures, then affected populations will be confused, ill-informed and likely not to trust in the mechanism.

### Step 2.1 Secure staffing, resources and management buy-in

When effectively implemented, CFM systems can form an integral part of the humanitarian system's accountability to people, and the sudden end of such a system can affect the community's relationship with the whole aid community. Embedding sustainability into a CFM system is critical to maintain the trust it builds with the community, and to ensure that this trust is not destroyed if the mechanism suddenly ceases. One way for DRC to ensure sustainability is to ensure that there is support for the mechanism at all levels, particularly senior management, and that there is sufficient allocation of both financial and human resources to oversee the CFM.<sup>126</sup>

In order to secure the necessary staffing and resources required to successfully manage a CFM, it is important to get buy-in from leaders. Furthermore, staff at all levels will need to be onboard at an early stage to understand what a CFM is, its benefits, why it is needed and how they can contribute. Consulting with and informing all staff as much as possible about the CFM and its ongoing development is important to obtain the necessary support and collective ownership for its successful implementation. This will help create a culture of support for the CFM and build relationships with key programme staff who will be essential in helping to respond to and close the feedback loop.

DRC country offices must identify the necessary resources for establishing and maintaining a CFM during the design, pre-implementation and during the programme. Resources for the CFM can be included in funding proposals, portions of these costs in budget lines of each individual project, or DRC can jointly seek funding and allocation of resources for an inter-agency CFM (where applicable) to encourage ongoing sustainability.

The financial costs for a CFM should be shared across all humanitarian projects. It is recommended to develop a master budget with an overview of all costs associated with the setting up of the CFM across all locations. The total cost will vary, dependent on the size of the country office and the size of the humanitarian response programme. Thinking ahead is important, and **below are some key questions to help guide staff in the budget development process.**

- **Scope:** across how many locations and field offices will the CFM be implemented? And for how many projects is the CFM needed and across how many different sectors?
- **Design phase:** what meetings and workshops with staff, partners or other agencies will be held, as well as consultation sessions with communities – where, how and how many?
- **Implementation costs:** what type of feedback modalities will be used, based on the preferences and appropriateness of each location and activity? For example, phone hotlines, SMS, WhatsApp, chatbots, face-to-face, FGDs. What types of IEC materials (verbal and written) will be required to promote the CFM? How will communication with communities take place during all phases of the project cycle? Is there a need for translation or interpretation support?

- **Technological costs:** what hardware and software systems will be required to roll out the CFM, including laptops, tablets, online feedback platforms, phones and software to run an Information Management System (IMS)
- **Staffing:** how many staff will be required at the field level and country office level realistically to manage and close all incoming feedback?
- **Travel costs:** how often will dedicated CFM staff be required to travel and how far?
- **Staff training:** what training materials and equipment or office space may be needed? Costs may involve venue, materials, refreshments or transportation costs.
- **Consultant fees:** will there be a consultant needed at any stage of the CFM process – in the CFM consultation phase or in the overall evaluation of the mechanism?

**Tool 6 – CFM budget** is an example of a master budget to plan for all potential running costs of the CFM.

It will also be important to consider the frequency of access to the internet, otherwise it will be hard to input feedback into one main IMS and other procedures for logging complaints will need to be considered and budgeted for. As a prerequisite for operating an efficient, confidential and accountable CFM system, trained staff must be responsible for implementing and safeguarding the procedure within an appropriate number of allocated hours.

<sup>126</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p77

«Important» **Managing a responsive feedback mechanism requires enough MEAL/Accountability staff who can consistently consult, promote, collect, document, refer, follow up, analyse and close all feedback in a safe and timely manner.**

DRC will need to carefully plan who will be responsible for what – because if feedback is not acted on, people will lose trust. DRC country offices will therefore need to decide on a structure for all roles required to oversee the CFM. DRC will also need to determine the corresponding CFM project focal points from different departments and programme teams who agree to take responsibility to help answer and act on incoming feedback within their team. See more in **Step 3.1. Define and divide roles and responsibilities to close the feedback loop.**

## Step 2.2 Appoint a Community Feedback Mechanism Steering Committee

To oversee the initial set-up of the CFM, as well as the ongoing implementation of the system, it is important for key staff, especially at the management level, to meet regularly. The establishment of an internal steering committee, particularly at the beginning is one important step to encourage collective ownership and support of the mechanism. Members will not be responsible for responding to feedback but rather will provide guidance and advice on contextual challenges to the CFM team. They contribute to jointly making decisions about the structure, resources and other components of the countrywide CFM, so this is not done in isolation. The appointed CFM staff can report back to this committee on a regular basis, on the progress, challenges, needs and suggested next steps – this will also help embed accountability during the pilot phase process.

Such a committee might be set up at the country-office level, or field level (or both) and members of this committee could include the Protection Manager, Camp Coordination and Camp Management (CCCM) Manager, Head of Programmes, MEAL Manager and Head of Support Services. DRC should also invite affected people to take part in these meetings as their input will be critical to shaping a relevant and effective CFM. The committee will play a role in overseeing all the preparatory work, action plan and offering feedback and practical insight into the development of the system and corresponding procedures.

## Step 2.3 Develop a Community Feedback Mechanism implementation action plan

Developing an action plan will help responsible staff understand what needs to be done and when. DRC staff are encouraged to develop a detailed CFM action plan to assist in outlining the actions and next steps for the country office to prepare and effectively oversee a robust CFM system. The plan should outline key phases and steps of the set-up as well as responsibilities and a timeline.

Overall, an action plan will help clarify the objectives and resources required and will bring relevant internal stakeholders together to reflect and build consensus. All parties involved can contribute to the planning process and this involvement will create ownership. The action plan in and of itself provides a means to measure success and progress. All actions should be as realistic and achievable as possible so as not to overextend the primary staff responsible.

**Tool 7 – CFM implementation action plan** offers a step-by-step overview of the different phases (with an emphasis on PSEAH) and example actions required in designing, implementing, monitoring and evaluating a CFM.

## Step 2.4 Identification of feedback scope: categorising feedback

«Important» **The creation of clear and concise categories for the types of feedback received is one of the most important parts of an effective CFM. Without explicit criteria outlining the specifics of each category, the system will likely be inefficient, and the resolution of cases will be slowed, which ultimately undermines the entire system and has the potential to cause harm to affected populations.**

Descriptions of each category scope should be included in CFM guidelines and SOPs to avoid confusion and provide clarity; if they are not, it will be incredibly challenging for staff implementing the system to fully understand the nature and severity of different complaints and thus act on them appropriately. Each category should be consistent, precise, and outline a specific time period for response with the most serious complaints escalated and handled as quickly as possible.

The immediate categorisation of feedback once it has been recorded triggers the next steps required for timely resolution. Clear and concise categories allow for easier identification of the feedback. Once the scope of the CFM has been agreed upon, DRC staff need to define the feedback

categories that the system will capture and respond to. The CFM will inevitably also receive feedback in relation to other agencies, as well as reports of protection incidents from within the community. These can also be dealt through the referral component of the CFM: it is only the role of DRC CFM staff to refer these issues to the respective agency, and/or incidents of violence perpetrated between community members through the humanitarian response directly to relevant protection actors, for example. These cases must be closed outside of DRC's CFM system.

What follows in the main table below is an example of the main feedback categories DRC staff can use. Enough detail must be captured so that the feedback can be referred to the relevant internal or external responsible person so that the issue can be followed up adequately. For sensitive feedback, as a general rule, details should not be recorded and less is more.

Staff may also like to add sub-categories to tag and improve the analysis of non-sensitive feedback increasing our ability to better track what people are telling us. For example, if there are repeated complaints about the quality of items provided, this can be followed up with the relevant logistics staff and programme managers to consider different suppliers. Feedback may also offer insight into other minor tweaks projects can make to improve overall satisfaction, such as improving communication with communities' efforts. **The sub-categories listed below may be included in your categories SOP tool for non-sensitive feedback:**<sup>127</sup>

Appreciation	Information request	Praise	Satisfaction
Appropriateness	Interference	Privacy	Selection criteria
Authorities	Lack of age/gender/diversity sensitivity	Quality	Sense of safety
Availability	Observation	Quantity	Suggestion
Cleanliness	Organisation	Registration	Staff
Communication	Participation	Relevancy	Strategy or policy
Complaint	Perceptions	Reliability	Tardiness
Contracts	Personal details	Responsiveness	Technology
Distribution		Rumours	

<sup>127</sup> Oxfam (Sheehan et al), *Setting up Community Feedback Systems in Oxfam Programmes*, (Oxfam 2018), p7

## Overview of DRC Feedback Categories

Feedback category #	Category type	Examples	Time frame for resolution (maximum time taken to follow up issue and get back to Person of Concern)
0	Appreciation or compliments	<p>This relates to positive feedback, including:</p> <ul style="list-style-type: none"> <li>Feedback messages to praise or thank DRC for assistance provided</li> <li>Explicit statements or expressions of satisfaction from communities about DRC's work</li> </ul>	N/A
<p>Recording positive feedback is useful for teams to have an evidence base to draw on in terms of what activities and services are being well received by communities. Sharing this regularly with programme teams may also be encouraging to them and managers can use this as an opportunity to thank staff for their good work.</p>			
1	Request for information	<ul style="list-style-type: none"> <li>Information about DRC as an organisation</li> <li>Information about current services or activities of DRC and its partners</li> <li>Location or time of the next registration, distribution or training</li> <li>Information regarding future projects</li> <li>Information about project methodologies (targeting, referral process, etc)</li> <li>Activities or services conducted by other agencies</li> </ul>	<p>If the request for information is to do with DRC's general programming and services, depending on the number of incoming feedback, staff should attempt to reply <b>within 7 to 10 days.</b></p>
<p>Recording and monitoring requests for information will assist DRC to understand gaps in our communication and community engagement and help us learn more about current community information needs and preferences. The types of requests can be shared with programme teams for them to adjust their information dissemination activities and improve their overall presence within the community as relevant.</p>			
2	Request for support or assistance	<p>This refers to non-sensitive requests for assistance, and does not include requests for protection support, which should be recorded in Category 4 (Protection).</p> <ul style="list-style-type: none"> <li>Request for assistance related to food, shelter, non-food items (NFIs), cash and voucher assistance, WASH, livelihoods, education, etc.</li> <li>Request for other types of support than the one proposed (needs, modalities, etc.)</li> <li>Request for help with identification (ID) cards</li> <li>Request to be registered, take part in trainings or to be included on distribution lists</li> <li>Request for relocation</li> <li>Changes in the household situation (number of household members, emerging vulnerabilities etc.)</li> <li>Request for activities to be conducted by DRC in a particular location</li> <li>Changes of personal information (name, location, address, phone, status)</li> </ul>	<p>If the request calls for urgent action (meaning the matter is time-sensitive) it needs to be flagged as urgent so that those responsible for following it up can treat it as a priority.</p> <p>For other general non-sensitive requests not considered urgent, depending on the amount of incoming feedback, staff should attempt to reply <b>within 7 to 10 days.</b></p>
<p>Tracking requests for support or assistance helps identify community needs and gaps. It might inform DRC of certain individuals or communities who are not yet receiving services where DRC has a presence. It can also alert DRC to areas of particular need and assist in decision-making on whether to expand into new areas or seek funding for more activities.</p>			

## 3

### Non-sensitive programmatic feedback

This includes neutral or negative opinions, suggestions, reports or complaints regarding the programmatic activities, services, processes or actions (or lack of action) of DRC and/or other humanitarian actors.

- Dissatisfaction with the quality of items received and shared examples of what is preferred (**complaint/quality/suggestion**)
- Insufficient tools available at cash for work site (**observation/quality**)
- Problems with ATM card/e-wallet/iris scan (**technology**)
- Poorly organised project registrations, distributions, or other activities (**organisation**)
- Errors or drastic changes with the quantity or quality of assistance received (**quantity/quality**)
- Lack of information about upcoming activities, selection criteria or targeting lists (**communication**)
- Delay in response – long gap between assessment and response (**responsiveness**)
- Attempted (non-threatening) influence or involvement of authorities or individuals in a position of power (**authorities/interference**)
- Assistance received was not enough to meet needs or does not meet the needs of at-risk groups, e.g. People with a Disability (**relevancy/lack of age, gender or diversity sensitivity**)
- The distribution point or location of services provided was too far away, too crowded, or felt unsafe (**appropriateness/sense of safety**)
- Waiting time to receive services or assistance was too long (**responsiveness/ tardiness**)
- Doubts about the selection criteria compliance and/or assessment results (**selection criteria**)
- Delays in referrals and response or promised follow-up on cases (**tardiness**)
- Lack of age, gender, diversity balanced team or appropriate interventions (**lack of age, gender or diversity sensitivity**)
- Incorrect information on identity or distribution cards (**personal details**)
- Unavailable or unresponsive staff during project activities (**availability/staff**)
- Sudden elimination or modification of distribution lists (**distribution**)
- Inaccurate understanding or expectations of services or assistance provided by DRC (**communication**)
- Person of Concern absent when outreach team surveyed their home; or some households or locations not included by DRC (**registration**)
- Unable to take part in DRC activities because of the time frame they are being held (**appropriateness**)
- Not included/invited to take part in a tendering process (**communication/contracts**)
- Language used in DRC's information campaigns and materials inappropriate and/or offensive (**communication**)

Depending on the urgency assessed by CFM and programme staff, and the amount of incoming feedback, staff should attempt to reply **within 7 to a maximum of 14 days.**

The time frame for resolution should consider the feedback channels decided upon, as well as the frequency with which the feedback can be collected by the CFM team and formally documented. E.g., if feedback boxes are only able to be checked by independent CFM teams every two weeks, then the time frame should incorporate this and, most importantly, be communicated to communities.

The distinction between non-sensitive feedback of DRC and its partners, and other actors can be made with the actions-taken section within the feedback form or IMS. E.g., referred internally or externally.

To ease the categorisation process and minimise confusion, DRC does not distinguish between minor and major dissatisfaction with non-sensitive feedback. **Once received, both the CFM team and the programme team responsible for follow-up will be able to discern the urgency and seriousness of the particular issue raised.** E.g., if there are no separate latrine facilities for men, women, boys, girls and people of all genders, the responsible team may want to make immediate changes to resolve this so that services are culturally appropriate and accepted by the community. DRC may need to organise meetings with the wider community to consult further, explain what actions can or cannot be taken, and close the loop on the issue, especially if it has been a reoccurring complaint within the community.

## 4

**SENSITIVE – Protection issue reported**

Reports of any form of violence, coercion, deliberate deprivation or abuse perpetrated by an authority, state actor or NSA, or another member of the community within a community. These reports usually necessitate a request for support, which should be facilitated by protection staff only. Examples may include:

- Violations to physical safety and security
- Housing, land and property issue (HLP)
- Restrictions to freedom of movement
- Victim of human trafficking
- Victim of smuggling
- Victim of torture
- Victim of physical assault
- Denied access to justice
- Unlawful detention
- Civil registration and documentation
- Gender-based violence (GBV)
- Child protection (CP)
- General protection concerns, including reports of civil unrest, crossfire, direct or indiscriminate attacks against civilians or property, forced recruitment into armed groups

**Immediately and within 24 hours.**

**Refer to designated protection service (if available) internally, or externally only with the consent of the complainant.**

Protection issues may be perpetrated by an authority, state actor or NSA, or another member of the community within a community. If it involves violations of rights by local authorities or parties to a conflict, the handling of these cases is at the discretion of DRC Protection Managers and/or the Country Director. CFM staff should only ever refer these when informed consent of the complainant is provided.

## 5

**SENSITIVE – CoC violation by DRC staff and representatives**

- SEAH – sexual exploitation, abuse and harassment by DRC staff or representatives, incentive workers and volunteers
- Verbal, physical or psychological abuse
- Corruption – such as bribes, or favours being asked (often money) of PoC to access assistance provided by DRC
- Fraud – such as the falsification or misrepresentation of any information e.g., the amount of assistance to be received for personal gain, political or otherwise
- Extortion – a person threatening violence in order to receive money
- Safety negligence by DRC putting communities or staff at risk by DRC staff or on DRC premises (unsafe programming)
- Theft or disappearance of assets, goods or cash meant for PoC by DRC staff
- Disciplinary issues related to DRC staff, such as bullying, discrimination or harassment
- Threats, blackmail, or intimidation by DRC staff
- Other inappropriate behaviour or other situations of abuse of power by DRC
- Questions regarding breaches of confidentiality of personal or sensitive data
- Favouritism towards a person or a category of people, including selection biases

**Immediately and within 24 hours.**

**Ensure issue is reported immediately to the Gate A country office CoCRM via the local CoC email:**  
drc\_country\_office@drc.ngo

**or to Gate B headquarters (HQ) for all SEAH and substantial fraud and corruption cases:**  
c.o.conduct@drc.ngo

All persons signing DRC's CoC, such as all DRC staff and representatives, incentive workers and volunteers have a mandatory obligation to report any suspected cases of misconduct. Staff may overhear conversations, be told directly, or have someone confide in them that they suspect misconduct is occurring. Suspicion is enough to report and, in all circumstances, all staff must report this immediately and directly to the CoCRM – and only to the CoCRM – to maintain confidentiality.

## 6

**SENSITIVE – Serious violation by other humanitarian actor (non-DRC staff)**

As outlined in Category 5 but involving other humanitarian actors such as UN, INGO, local NGO or CBOs.

**Immediately and within 24 hours where possible.**

If the issue involves allegations of abuse or exploitation by representatives of other humanitarian actors, this should be reported to those agencies' respective ethics or code of conduct reporting system, or the local inter-agency PSEAH network reporting mechanism, as relevant, only with the consent of the complainant.

## 7

**SENSITIVE – Safety and security threats**

The examples below refer to threats indirectly or directly targeting DRC and/or the humanitarian community:

- Theft, robbery, loss or damage to DRC's property, assets or programmes
- Indirect threats (affecting anyone and part and parcel of working in a particular setting) including vehicle accidents, natural hazards and disasters, disease outbreaks
- Direct threats or warnings that target multiple humanitarian agencies, DRC or an individual staff member, these include: harassment, acts of violence, armed robbery, detention, abduction, kidnapping or arrest of DRC or other aid agency staff
- Any near-miss incident where, either through chance or appropriate actions, an incident was narrowly avoided (not caused by DRC)
- Serious injury or illness to DRC staff who may need immediate medical or hospital treatment

It is not always relevant to report back to the complainant here. However, it is crucial that this is immediately reported to DRC's security or safety focal point as well as the Country Director.

**Please note that direct threats targeting specific individuals within a community should be reported as a protection issue.**

Immediately refer and assign to the relevant security or safety advisor and include the Country Director.

### Step 2.5 Define clear policies, procedures and processes

The process and procedures for handling feedback need to be clearly documented concisely and clearly on paper for staff to consistently follow for the benefit of the communities we serve. DRC country offices are expected to develop a clear overarching CFM policy (framework), guidelines and any relevant SOPs to map out all procedures involved in the set-up and handling of feedback. These documents will need to outline the detailed steps and processes for managing of sensitive (i.e., relating to protection concerns, sexual exploitation, abuse and harassment, or other gross misconduct or malpractice) and non-sensitive information (e.g., dissatisfaction raised regarding selection criteria).

Once a structure for handling feedback is agreed upon, relevant staff will be designated to recording, documenting, following up and answering feedback to adequately respond to the needs, concerns and views of affected populations.<sup>128</sup> It is important that the titles of the staff members responsible for different aspects of the CFM processing cycle are referred to consistently throughout the CFM policy or guidelines. This will avoid confusion and offer much needed clarity on the roles and responsibilities of the identified staff overseeing the CFM. A response should always be provided within a specified time frame appropriate for that context and chosen feedback modality, and the complainant should be made aware of when they should expect a response, if a response is needed or requested.<sup>129</sup>

CFM procedures should be clearly and simply laid out, leaving no room for ambiguity about what happens once feedback is received. All parts of the feedback loop cycle should be straightforward in terms of instruction and actions. The CFM policy and guidelines should concisely explain the:

- **Purpose and scope** of the CFM (the what, why, for whom and where) and **guiding principles**
- **Consultation and participation plan** to involve communities in the CFM process
- **Feedback modalities** outlining how feedback will be received, and rationale
- **Procedures** for how feedback will be processed outlining all the steps of the feedback loop (receiving, acknowledging, categorising, recording and closing feedback)
- **Information management system** to record, track and analyse feedback safely, confidentially and thoroughly
- **Protection from Sexual Exploitation, Abuse and Harassment (PSEAH)** measures and systematic efforts to address this throughout the CFM set-up
- **Referrals** mapping out clear roles and responsibilities for how feedback should be handled (both internally and externally) for non-sensitive and sensitive complaints, with ideal time frames for resolution
- **Information dissemination** and communicating with communities plans and approach
- **Resource requirements**, including corresponding annexes with a master budget and an organogram clearly outlining the structure, management lines, staffing and teams responsible for the CFM
- **Monitoring and evaluation strategy** for how feedback will be periodically analysed, reported and shared for ongoing programmatic and strategic learning; as well as how the CFM itself will be evaluated.

**Tool 8 – CFM Feedback Categories SOP** presents a detailed step-by-step example of how to close and act upon each feedback category.



It is important to identify other DRC organisational policies that link to the CFM within the policy framework and guidelines, as it will need to be well-connected to these to adequately prevent and respond to staff misconduct and ensure that existing reporting mechanisms are being followed, such as the CoCRM. Reviewing and identifying relevant policies that may connect to the CFM implementation can be conducted with the Steering Committee, and may include:

- DRC's Global Code of Conduct and CoCRM
- DRC's Global Policy on Safeguarding and Global Child Safeguarding Policy
- Global Anti-corruption Policy
- DRC's Leadership Concept
- DRC's Background Check Policy
- DRC's Compliance Tool: Safeguarding Through the Employment Cycle
- DRC's Global Age, Gender and Diversity policy.

#### Tool 9 – CFM Policy Framework and Guidelines

is a template for country offices to commence defining their CFM systems, processes, structure and staffing.

<sup>128</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p51

<sup>129</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), pp20-21

## PHASE

## 2

IMPLEMENTING AND MANAGING  
A COMMUNITY FEEDBACK MECHANISM**Step 3 Embed  
responsiveness:  
effective feedback and  
complaints handling***The response: processing, managing  
and addressing feedback**Core Humanitarian Standard Key Action**5.3: Manage complaints in a timely, fair and  
appropriate manner that prioritises the safety of  
the complainant and those affected at all stages.**Core Humanitarian Standard Organisational**Responsibility 5.5: An organisational culture in  
which complaints are taken seriously and acted  
upon according to defined policies and processes  
has been established.*

Once the practicalities and all features of the CFM system are agreed upon, documented and adequate resources and staffing allocated to implement the approach as feasible for the context, all phases of the feedback loop and processing cycle must be given extra attention to ensure they are clearly defined and understood. This section moves from the documentation and planning phase to zoom in on the actual feedback processing cycle to review how non-sensitive and sensitive feedback should be handled and acted upon.

The feedback loop for handling non-sensitive vis-à-vis sensitive feedback is different. Typically, non-sensitive feedback can be managed via appointed internal CFM project focal points and outcomes can be shared in a more public manner. However, sensitive feedback should never be shared publicly, and requires a higher level of confidentiality and data protection efforts.

As previously outlined, any sensitive feedback disclosed by community members involving the misconduct of DRC staff should immediately and directly be reported to the DRC CoCRM by that staff member without delay. To maintain confidentiality, the priority should be for it to reach the CoCRM only – it should not be shared with anyone else. It will not require additional reporting to the CFM team as double handling of any sensitive feedback should always be avoided. Further, the reporting system for dealing with sensitive complaints involving misconduct of DRC staff operates independently from the CFM staff overseeing non-sensitive feedback. Occasionally CFM staff are also appointed CoCRM intake committee members, and this is preferred to minimise data protection risks. When complaints are submitted to the CoCRM, they will be processed by a separate Code of Conduct team guided by principles of transparency, confidentiality and impartiality.

When feedback falls outside the control and responsibility of DRC, referral mechanisms and service mapping will be required to facilitate referrals to other agencies, but only where this has been explained clearly and consent provided by the complainant. Any sensitive feedback involving the suspected misconduct of other agencies should be reported to their respective ethics or code of conduct reporting system, but only when this is in line with the wishes of the affected person.



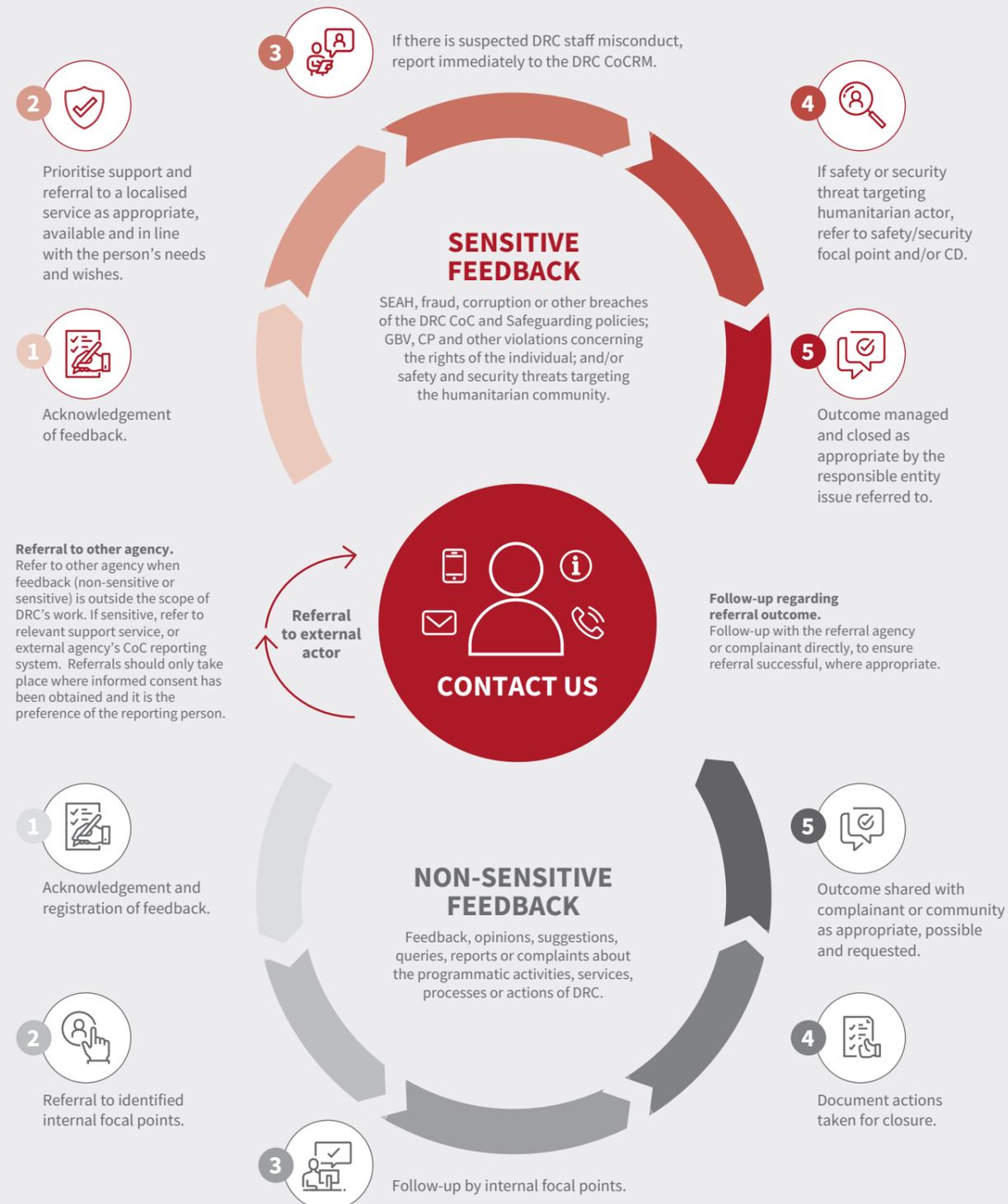
The feedback loop will always require consideration of the local context and local actors. A universal example of a processing cycle for how DRC should generally approach handling non-sensitive and sensitive feedback as well as referrals is provided below. More detailed steps are also outlined in this section. This approach was designed to prioritise a survivor-centred approach and immediate protection assistance. The well-being and wishes of the complainant or survivor (of SEAH) of any incident must be put at the centre of all actions taken and staff must only act in line with the person's stated preferences.

All CFM staff need to be trained to prioritise support services as an immediate action for the affected person upon receiving sensitive cases. This will be through established referral pathways and ongoing programmes offered by community-based actors or other agencies providing GBV, CP or other needed protection support available within the broader humanitarian response. Referrals to competent support services as appropriate and available (within DRC if available, or to other relevant external protection actors) must only be conducted when informed consent is obtained.

Sensitive feedback should be closed by the relevant entity responsible for the issue raised, e.g., by the DRC CoCRM if it involves a DRC staff member, or by the relevant specialised support service where referrals have been made.

## Designing feedback loops

DRC adopts a survivor-centred approach to managing all feedback, which prioritises the affected person's wishes, safety and well-being at all times.



### Step 3.1 Define and divide roles and responsibilities to close the feedback loop

Only trained CFM staff should be responsible for the overall management and handling of feedback received through the selected feedback modalities. Ideally, CFM staff should be trained on confidentiality, protection, the CHS, PSEAH, psychological first aid, how to manage disclosures and how to adequately deal with people presenting with mental health challenges, e.g., suicide response management, so they are adequately equipped to handle the breadth of feedback that may present. DRC has a duty of care and must maintain safe systems of work for CFM staff. DRC must ensure that staff have the necessary training, supervision, debriefing and mental well-being support available.

To manage feedback in a timely, fair and appropriate manner, it is important to identify who does what and when, and how various feedback categories will be handled. The CFM should ideally have dedicated Accountability staff members across the operation to oversee the mechanism. These staff members should operate as a separate unit, independent of programme teams. Sometimes they are placed within MEAL teams but may also be independent of MEAL, depending on the set-up of the operation.

The CFM team will be responsible for ensuring that adequate community participation underpins the design of the mechanism and key modalities are promoted through a variety of formats. They will ensure that feedback is routinely collected through all relevant entry-points and filed into a secure IMS. They also play a role in mainstreaming the CFM to be a core part of all project activities and oversee the ongoing day-to-day running of the CFM to ensure that all feedback is properly referred, acted upon and closed within communicated time frames. CFM staff will also analyse, report on and share learning as appropriate internally and externally and make recommendations to improve

programme implementation and broader strategies. Finally, CFM staff may be responsible for providing technical support to DRC's partners in the development of their CFM procedures and implementation.

For each stage and related steps defined in corresponding guidelines, specific roles and responsibilities need to be clearly assigned. Roles and responsibilities should be assigned to appropriate staff members working in the following types of functions, for example:

- **Senior Management Team:** ultimately accountable for the set-up and performance of the CFM, as well as providing the organisational commitment, and encouraging a culture supportive of welcoming and addressing feedback and complaints.
- **Country Director and Head of Programmes:** act as champions of accountability to affected people and hold all programme teams to account for effectively mainstreaming the CFM and using relevant data and reporting in decision-making. They are responsible for the effectiveness of the CFM as well as converting learning into broader organisational changes.
- **Project Managers:** provide programmatic-level support for the implementation and operation of the CFM. They should create a demand for feedback data and use it for ongoing programme adjustments and decision-making.
- **MEAL Manager:** has oversight of the running of the CFM across all areas on a day-to-day basis, including coordinating with field offices and partner staff to ensure consistent understanding, capacity, tools and guidance to mainstream the CFM. The CFM team/system may sit as a sub-unit within MEAL, and/or within another department.



- Accountability/CFM staff at the field office:** responsible for the day-to-day operation of the feedback channels, including directly receiving and processing feedback, leading on quality control, data analysis and reporting, and staff and community sensitisation. It is good practice for the most senior Accountability/CFM staff member to also be appointed as the Registrar of the CoC team so that sensitive feedback involving the misconduct of staff can be entered directly into the separate CoCRM system.

All staff members responsible for the CFM management need to be identifiable in relevant policies and procedures. There must be a clear outline of the respective roles and departments in the operation of the CFM system in SOPs and guidelines. A flow chart or workflow can often be useful in this circumstance to illustrate the direct lines of reporting and communication throughout the CFM process. Below is an example of an organogram outlining the interlinkages and different roles and responsibilities needed to implement a CFM system. This can be adapted across DRC country offices.





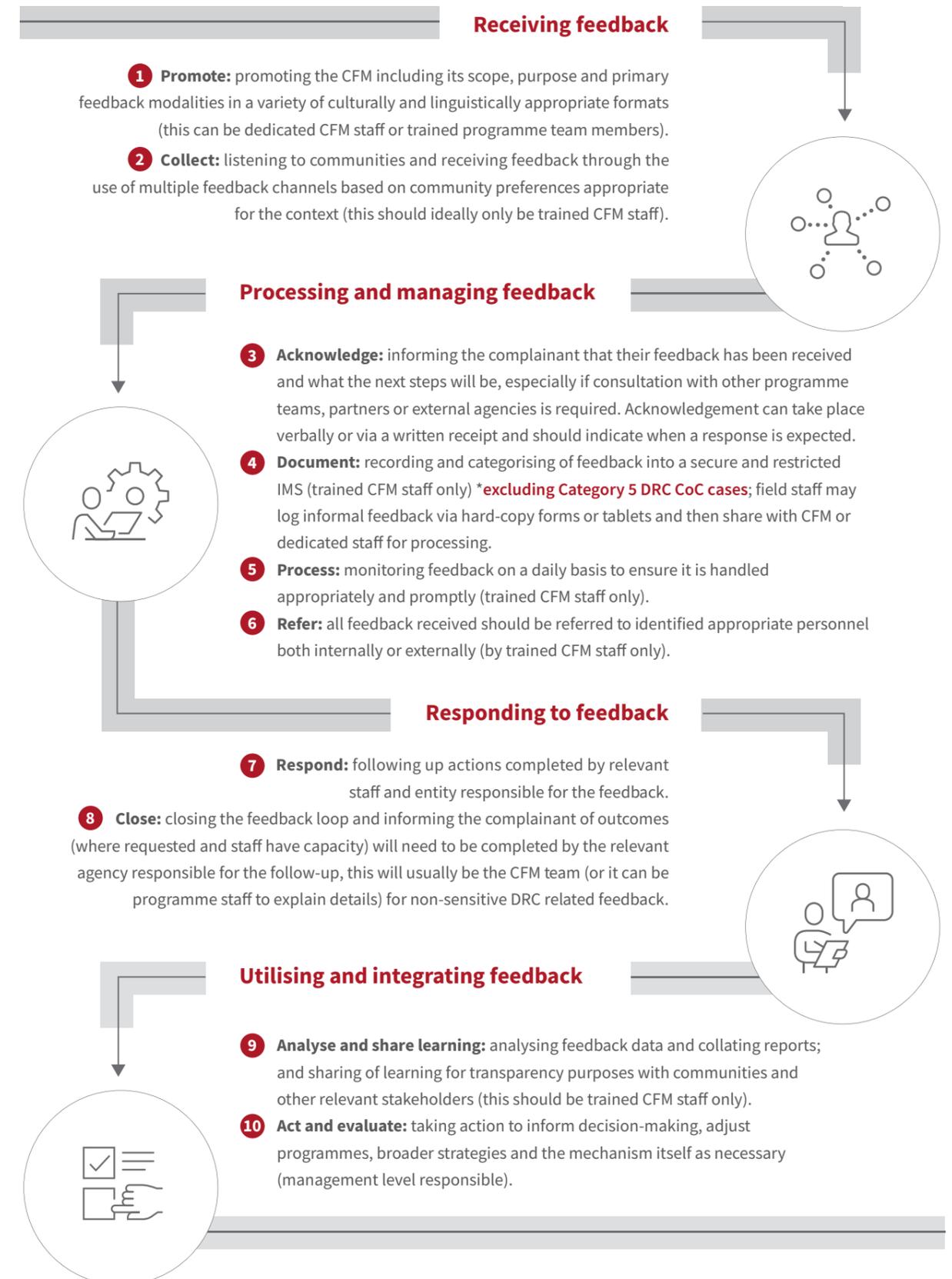
**Tool 10 – CFM Workflow Template** is an example workflow outlining who is responsible for what, when, and within which time frames for managing non-sensitive and sensitive feedback.

Developing clear Terms of Reference (ToR) for CFM Officers to encapsulate their responsibilities expected in the overall management of a CFM system is also a useful planning and communication tool when first setting up the CFM system.

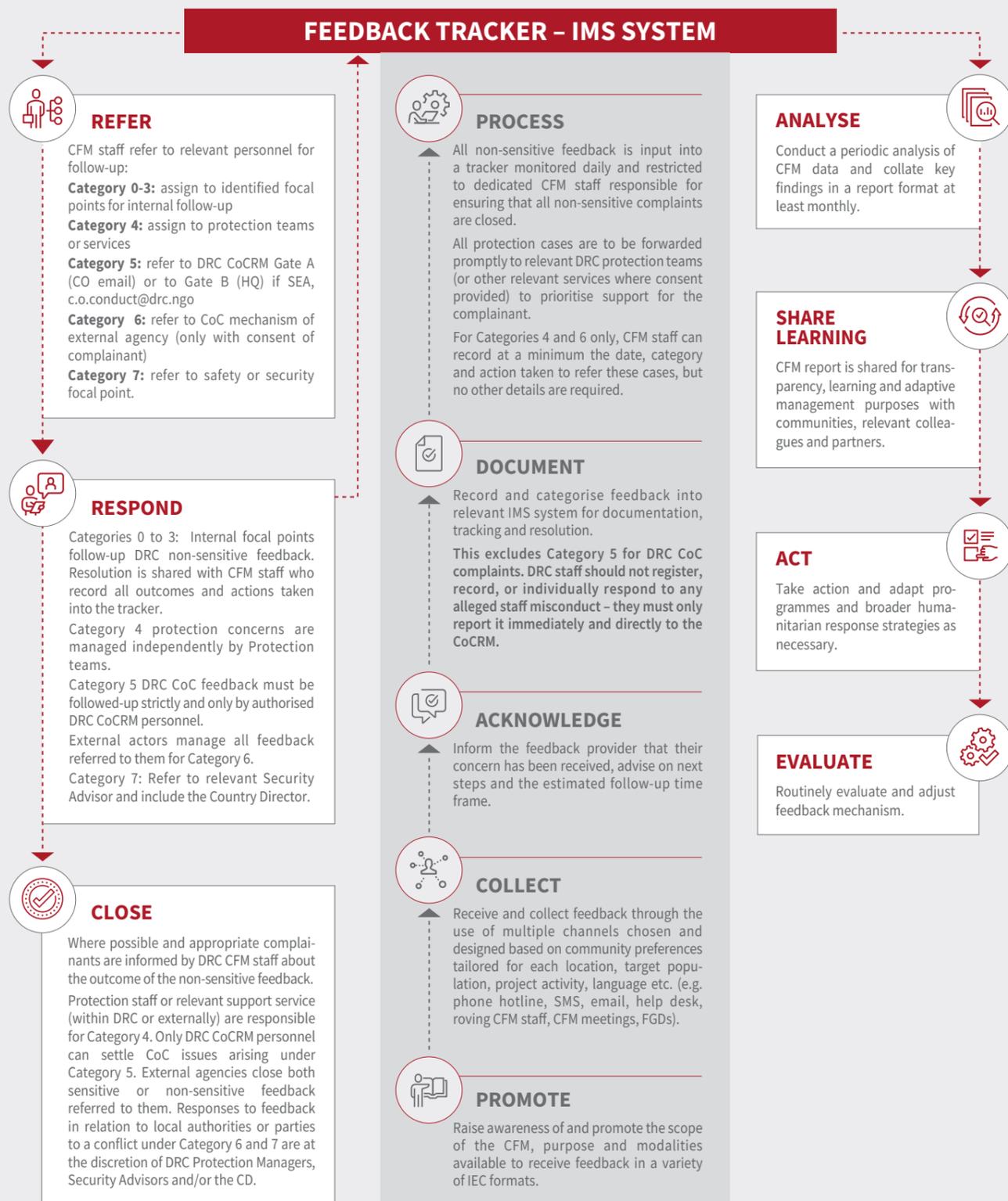
**Tool 11 – CFM Officer ToR** offers an example of the typical roles and responsibilities of staff involved in the day-to-day running of a CFM system.

### Step 3.2 Processing feedback

All DRC staff will need training to distinguish between the management of non-sensitive and sensitive feedback as these will have different referral and follow-up pathways. The overall process should be simply and clearly explained to all staff and communities so there is full transparency in terms of how feedback is handled throughout the entire feedback processing cycle. As an example, see the **Feedback Processing Flowchart**, which outlines the stages involved in processing feedback and complaints handling.



## Example of Feedback Processing Flowchart



### Step 3.3 Responding to non-sensitive feedback

It is recommended that DRC teams nominate **CFM project focal points** in each department or sector team (e.g., GBV, CP, General Protection (GP), CCCM, Shelter, Livelihoods (LLH), WASH, Humanitarian Disarmament and Peacebuilding (HDP), logistics, HR, administration, security, etc) who will work closely with CFM staff, especially at the initial stages of the set-up of the system. This person should be selected by the project manager and should be a more senior member of staff, e.g., team leader. Over time, CFM staff will build relationships with and become acquainted with those responsible for different aspects of a project within each team, and they can eventually approach these staff members directly as issues arise. However, the project focal point ultimately has the primary responsibility for ensuring that any non-sensitive feedback raised can be resolved adequately and in a timely manner. This person will receive non-sensitive feedback or complaints referred by the CFM team and they will also play a role in ensuring that the CFM is promoted (where possible) in all ongoing project activities of their team. In summary, the specific functions of their role can include:

- **Resolution:** receiving non-sensitive feedback from CFM staff and delegating issues within their teams to relevant staff for follow-up; and communicating back outcomes to the CFM team for logging.
- **Promotion:** advising on the most appropriate modalities, IEC materials and approach to community sensitisation of the CFM; organising and supporting community meetings to promote the CFM; and supporting CFM staff to report back to communities on feedback received, actions taken and issues still pending.
- **Mainstreaming of the CFM:** ensuring the CFM is promoted as much as possible and integrated into in all current and future ongoing activities of their team.
- **Encouraging all staff to report directly to DRC's CoCRM:** regularly discussing and educating staff about what CoC issues are and staff's responsibility to maintain confidentiality and to report cases of suspected misconduct to the CoCRM only, immediately and directly.

**Tool 12 – CFM Project Focal Point ToR** provides an overview of the key roles and responsibilities of nominated department or sector CFM project focal points.

All sector teams and identified project focal points should also work with CFM staff to ensure that a Frequently Asked Questions (FAQ) document is developed to guide CFM teams in being able to promptly answer commonly asked questions that might come through about their projects via primary feedback channels, such as a phone hotline or SMS service. Having this prepared will assist CFM staff to be able to provide immediate answers and information to communities, which will contribute to building trust and acceptance and alleviate any fears, concerns or uncertainties they may have.

**Tool 13 – Frequently Asked Questions (FAQ) template** is an example tool to document commonly asked queries or requests for different projects.

Regardless of the modality used to collect feedback, people and communities affected by crisis should always be informed about how they can expect answers to be given. This may be in the form of a direct phone call back to the complainant, messaging through community meetings (where the issue is non-sensitive) or household visits. The response back to the complainant is critical to be able to fully close the feedback loop and maintain trust with PoC. It should also always be decided upon considering the local context and in line with community preferences.

#### **Resolving non-sensitive feedback pointers**

When responding to **non-sensitive feedback**, DRC CFM staff should aim to:

- Capture basic contact details of the complainant, only when this is required for a response to be provided directly back to that individual, otherwise the matter will be difficult to follow up. Personal information for non-sensitive feedback should only be recorded when there is agreement from the complainant to do so and it should always and only be entered into a secure and restricted log form or database. Only record data that is necessary, for example, consider documenting that person's location only, rather than a detailed address. Consider routinely deleting all personal data at an agreed period after the matter has been closed.
- Only commit to following up individually if the matter requires an individualised response and the CFM team has the capacity to do so. It is good practice to ask the reporting person whether they would like a follow-up. Decide who will be responsible for closing the feedback loop; depending on the nature of the feedback raised, this may need to be programme teams

so they can explain any progress or hindrances in more detail. There will need to be frequent and strong communication between CFM staff and nominated CFM project focal points to facilitate this. Always seek consent before sharing any feedback with staff, and ideally only anonymised data should be shared, unless it is needed for focal points to close the loop.

- Where feedback is not urgent, try to collate it during the week, and then share it with CFM project focal points in one communication, instead of sending multiple emails a day.
- Encourage sector teams and CFM focal points to make obvious changes or improvements as soon as possible as this will show that DRC has listened. Staff can further discuss and explain that certain actions were taken because of community feedback received, which will demonstrate that concerns are taken seriously, and the CFM is therefore a worthwhile mechanism.<sup>130</sup>
- Always be honest, especially when questions cannot be answered. DRC must be transparent with communities about what is and what is not currently possible in resolving a matter.
- Check in and meet with CFM project focal points and sector teams on a regular basis to discuss any informal feedback that might have been shared with them recently and discuss how to jointly respond to topical issues raised. A lot of informal feedback may be able to be resolved quickly and on the spot with common sense and knowledge of the programme. Encourage programme teams to do this wherever possible. Even if the issue is resolved immediately, it is still good practice to record the issue via a feedback form (online or hard copy) so it reaches the CFM team, who can capture the issue and note the outcome taken.<sup>131</sup>

<sup>130</sup> IFRC, *Feedback Starter Kit*, (IFRC 2019), p13, retrieved from this link (accessed December 2021)

<sup>131</sup> SCI, *Programme Accountability Guidance Pack*, (SCI 2013), p30



- Work with project teams to validate feedback when required to verify the accuracy of the information provided by the complainant, e.g., by confirming that the person meets the vulnerability criteria or by checking that maintenance work undertaken requires further attention. A two-person team to verify non-sensitive feedback received will be important, and at least one of these should be a CFM staff member, so they are independent from the issue being reviewed.
- CFM teams should work with Monitoring and Evaluation (M&E) colleagues to integrate AAP questions into their ongoing monitoring processes so that DRC can routinely assess satisfaction levels of using the CFM as well as any changes made as a result of receiving feedback. Further, the overall CFM can be evaluated with communities as a stand-alone exercise that can be coordinated with M&E staff.
- Develop scripts to guide CFM staff and corresponding SOPs for all of the chosen feedback modalities to ensure that there is always clear guidance on minimum steps and consistency on how to operate all entry points. Examples are provided in **Tool 14** below.

**Tool 14 – Helpdesk and Hotline SOP** offers a documented process for staff managing help desks who are responsible for receiving and recording feedback where DRC has an active presence in communities, e.g., during registrations or distributions. It also includes an example of detailed instructions for how to manage a hotline service.

### Step 3.4 Responding to sensitive feedback

All DRC staff, from senior management right through to frontline staff, including drivers and cleaners should be trained on and understand what sensitive feedback is and how to deal with it. As previously emphasised, regardless of the intended scope of a CFM system of a country operation, there will be no control over the types of feedback that PoC submit, and therefore CFM systems must have the capacity to refer a broad spectrum of feedback and complaints.<sup>132</sup> Failure to anticipate and respond to all feedback types may have a negative impact on the credibility of the CFM, DRC and the humanitarian community in general.

At DRC, as explored in **Part 1: The Fundamentals of Feedback**, sensitive feedback broadly relates to:

- Allegations of serious violations of national or international law pertaining to the rights of the individual. This may include reports of violence, coercion, deliberate deprivation or abuse perpetrated by an authority, state actor or NSA, or another member of the community within a community
- Breaches of DRC's Code of Conduct or Safeguarding policies by DRC staff or representatives, such as sexual exploitation, abuse and harassment, discrimination, fraud or corruption
- Serious breaches of misconduct, as per the above, perpetrated by other humanitarian actors
- Safety and security threats either indirectly or directly targeting DRC or the humanitarian community.

### Resolving sensitive feedback pointers

What follows is a general guide for how to manage sensitive feedback received through a CFM, or informally through frontline staff. All sensitive feedback will need to be escalated so it can be managed by appropriate support services or DRC's Code of Conduct representatives.

**«Important» Staff members should never attempt to investigate sensitive cases on their own. Investigation of sensitive cases entails searching for evidence or a solution and discussing it further with other people. It is the duty of all staff to report sensitive cases immediately and to keep all information confidential.**

If a staff member begins to notice that receiving any sensitive information has affected their mental well-being in some way, they are welcome to approach their manager, local CoC Registrar or HR manager to discuss support options available. They should also report the issue to them directly if for some reason they cannot access the DRC CoCRM, and they can then report it on their behalf. As part of our duty of care to staff, managers should routinely check in and provide opportunities for debriefing and professional supervision, especially for CFM staff who are at the receiving end of feedback.



<sup>132</sup> Inter-agency Standing Committee, *Global Standard Operating Procedures on Inter-Agency Cooperation in Community-Based Complaint Mechanisms*, (IASC 2016), p21

**All DRC staff and representatives, must know how to report, and must prioritise their obligation to report sensitive feedback promptly according to the suggested responses outlined below:**

Sensitive feedback category	Suggested response
<p><b>Category 4</b></p> <p>Any <b>protection issue reported within the community</b> – e.g., forced, denied or restricted movement, denial of liberty, denial of justice, denial of land and property, physical violence, sexual violence and GBV, denial of civil and political rights, or any other form of violence, coercion, deliberate deprivation and abuse perpetrated by an authority, state actor or NSA, or another member of the community.</p>	<ul style="list-style-type: none"> <li>• <b>Prioritise support</b> and immediate localised protection assistance for the complainant as appropriate and available, and in line with the person's needs and wishes</li> <li>• <b>Conduct referral</b> to competent support service (within DRC if available, or to other relevant external protection actor through established inter-agency pathways). Referrals should only take place where informed consent has been obtained and where this is the preference of the reporting person. Alternatively, DRC can also provide the referral information of relevant services directly to the complainant if that is their preference. <ul style="list-style-type: none"> <li>- If DRC provides the service, and they would like to be referred to support offered by DRC, refer it to the field-level Protection Manager or focal point of that area for follow-up.</li> <li>- If there is no service available, seek advice from the field-level Protection focal point in that area to handle the issue. They may support the complainant/survivor to reach a service in a different region and must prioritise the safety and consent of the person at all times.</li> </ul> </li> <li>• If it involves violations of rights by authorities or parties to a conflict, the handling of these cases is at the discretion of DRC Protection Managers and/or the Country Director.</li> <li>• CFM staff can record at a minimum the date, time, feedback category and action taken to refer these cases, e.g., referred to internal Protection specialist. Avoid recording details of the incident or personal identifiable information into the CFM database. Where details need to be passed on to external agencies or specialists, the reporting person should always be asked for permission, and this should be done in line with internal referral procedures.</li> </ul>

#### Category 5

Any **breach of the DRC CoC or Global Safeguarding Policies by DRC staff or representatives** including, for example, fraud, corruption, any form of sexual exploitation abuse or harassment, discrimination, or not observing local laws.

- **Prioritise support** and immediate localised protection assistance to an external support service as appropriate and available, and in line with the person's needs and wishes. If DRC is the only actor providing the necessary support service in the area, refer within DRC. However, prioritise external agencies first to manage any conflict of interest. Facilitating immediate support for the person based on their consent and wishes is part of the survivor-centred approach and referrals should be managed by trained staff only.
- **Immediately and within 24 hours** ensure issue is reported to the Gate A country office CoCRM or to Gate B HQ for all SEAH and substantial fraud and corruption cases: [c.o.conduct@drc.ngo](mailto:c.o.conduct@drc.ngo)
- CFM staff should not record these cases into the CFM database at all – and instead prioritise reporting these immediately and directly to the CoCRM.

#### Category 6

Allegations of **serious violations by other humanitarian actors (non-DRC staff)** – this includes staff misconduct and safeguarding breaches of other UN, INGO, NGO and CBO agencies.

- **Prioritise support** and immediate localised protection assistance as appropriate and available, and in line with the person's needs and wishes.
- Consider reporting the issue to those agencies' respective ethics or Code of Conduct reporting system, as well as the local inter-agency PSEAH network reporting mechanism, as relevant, and only as per the stated preferences and informed consent of the complainant at all times.
- CFM staff can record at a minimum the date, time, feedback category and action taken to refer these cases, e.g., referred to CP service or CD/CoCRM of another actor. Avoid recording details of the incident or personal identifiable information into the CFM database. Where details need to be passed on to external agencies or specialists, the reporting person should always be asked for permission, and this should be done in line with internal referral procedures.

#### Category 7

**Safety or security threats** that either indirectly or directly target DRC or other humanitarian actors.

- Immediately refer and assign to the relevant security advisor or focal point and include the Country Director.
- CFM staff can record at a minimum the date, time, feedback category and action taken to refer these cases. Avoid recording details of the incident or personal identifiable information into the CFM database.



Responses in relation to reports of rights violations perpetrated by authorities, state actors or NSAs, or other members of the community or other parties to a conflict under **Category 4** are at the discretion of DRC Protection Managers and/or the Country Director. Sometimes there cannot be any specific follow up directly to the individual; however, DRC can play a role in carefully alerting others to protection concerns raised through its advocacy work and participation in Protection working groups.

«Important» The details and personal information of reporting persons for **Category 4** (protection concerns), **Category 6** (violations by other humanitarian actors) and **Category 7** (safety and security threats) should not be recorded by CFM staff inputting them into the IMS. At a minimum, they can record the date, time and feedback category of the complaint for tracking and analysis purposes, and the action taken to 'refer' the case (where relevant), but no other details should be recorded. It is suggested that the description of the feedback or complaint be left blank. If the case needs to be referenced later at any stage, it should be referred to by CFM staff by the case number only. CFM staff should be trained on filling out referral forms to Protection teams and other support services, and these should be at their disposal as per internal and inter-agency procedures and standards of that operation.

«Remember» All incidents involving alleged sexual exploitation, abuse and harassment perpetrated by DRC staff or representatives must be reported immediately and directly to the Gate B level, at the headquarters of DRC. Reports can be made in any language. Reports of SEAH can be made to: [c.o.conduct@drc.ngo](mailto:c.o.conduct@drc.ngo) or via [drc.ngo/report](http://drc.ngo/report)

Only trained staff should investigate allegations of SEAH – and this is only at the discretion of the global HQ Code of Conduct unit.<sup>133</sup>

«Important» Failing to report allegations of misconduct is considered to be a violation of DRC's Code of Conduct.

All DRC staff and representatives need to be made aware of how to deal with reports of misconduct safely, appropriately, immediately and confidentially. They should know their responsibility is to report directly to the CoCRM platform, including for volunteers, incentive workers, cleaners and/or drivers, who are often at the coalface of project implementation.

Matters received via the CFM involving the misconduct of staff of another agency can be reported to that agency's own complaints system. However, this should only be done if it is in line with the wishes of the complainant/survivor. Some actors involved in the response may not have fully established CFM handling systems, or these may only be partially set up with little clarity on how or to whom to safely submit allegations of misconduct, especially SEAH. In these circumstances, if the matter involves SEAH of another agency without a well-

established reporting system, DRC staff can consider reporting the allegation to the relevant inter-agency PSEAH network reporting system, which may have the dedicated resources for independent investigators and established pathways for quality survivor support services. The stated preferences of the survivor must be respected at all times.<sup>134</sup>

### Step 3.5 Protection from Sexual Exploitation, Abuse and Harassment and the survivor-centred approach

*Core Humanitarian Standard Organisational Responsibility 5.4: The complaints handling process for communities and people affected by crisis is documented and in place. The process should cover programming, sexual exploitation and abuse, and other abuses of power.*

*Core Humanitarian Standard Organisational Responsibility 5.6: Communities and people affected by crisis are fully aware of the expected behaviour of humanitarian staff, including organisational commitments on the prevention of sexual exploitation and abuse.*

At DRC, PSEAH is enshrined in DRC's global Code of Conduct and Safeguarding policies. DRC has a zero-tolerance policy for any act of sexual misconduct – including sexual exploitation, abuse and harassment. These violations constitute acts of serious misconduct and are therefore grounds for disciplinary measures up to and including summary dismissal.<sup>135</sup> SEAH constitutes the most egregious breach of accountability to those whom organisations aim to assist and protect.<sup>136</sup>

<sup>133</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p20

<sup>134</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p44

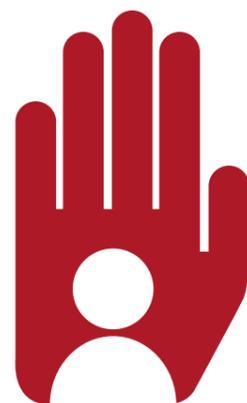
<sup>135</sup> This includes instant dismissal or dismissal without notice.

<sup>136</sup> Inter-agency Standing Committee, *Confused about AAP and PSEAH? Inter-Agency Task Team on Accountability to Affected Populations and Protection from Sexual Exploitation and Abuse (AAP/PSEAH)*, (IASC 2017)

## ZERO TOLERANCE NO EXCUSE

# STOP

SEXUAL  
EXPLOITATION  
ABUSE AND  
HARRASSMENT



In both HQ and field operations, DRC management is responsible for creating and maintaining an environment that prevents sexual misconduct. Management shall take appropriate measures for this purpose, including training regarding the Code of Conduct and combatting SEAH, and the establishment of a localised Code of Conduct Reporting Mechanism in all operations.

### **PSEAH-ready Community Feedback Mechanisms**

Whilst CFM systems are designed to alert DRC to any shortcomings in programming and the provision of aid, they may also receive disclosures of SEAH and must be ready to respond appropriately. Raising concerns of SEAH can be distressing for the survivor and the staff member receiving such disclosures. Across the many diverse populations with whom DRC works, SEAH issues may also be considered a taboo topic and thus not raised or reported. DRC must prioritise preventative measures to reduce the likelihood of SEAH incidents occurring. Therefore, clear guidelines and messaging about the expected behaviours of staff, the CoCRM procedures and how and where to report are crucial,

as is ensuring that staff, and communities, are aware of these and their obligation to report SEAH incidents.

Failing to follow up such serious breaches of misconduct could affect the trust and acceptance of DRC within a community. Investigations will not always go ahead without the wishes of the survivor and will only ever be conducted by experienced and qualified CoCRM investigators. All substantiated complaints will result in disciplinary action or contractual consequences.<sup>137</sup> DRC should always direct staff and affected people to report serious abuse and misconduct, especially regarding SEAH, straight to the HQ Gate B CoCRM channels.

### **The survivor-centred approach**

DRC staff must ensure that a survivor-centred approach is embedded when establishing CFM systems across all programmes.<sup>138</sup> This includes prioritising the survivors' experiences, rights, needs and wants at the centre of reporting, investigative and response systems including referral processes. A survivor-centred approach should be grounded in respect for human rights, as well as respect,

confidentiality, safety and non-discrimination; this should be explained to all staff, especially those operating the CFM.<sup>139</sup> Support services should be made available to the survivor, or DRC can assist in referring the person to a requested service, if in line with their wishes.

Survivors may need urgent, medium and long-term medical, legal, psychosocial or other types of assistance. Service providers must be mapped out to support access to services, based on the survivor's wishes. The mapping of available local services should include information on those that can support vulnerable target groups; for example, children, women, people with a disability or who identify as LGBTIQ+. The development of localised service mapping lists must be included in the CFM action plan and may build on pre-existing inter-agency referral pathways.<sup>140</sup>

Staff are obligated to report all suspected serious misconduct, and especially SEAH, directly to the global (Gate B) CoCRM. This may present a dilemma for staff following the survivor-centred approach if survivors have raised concerns about the obligation of a staff member to report. Staff should make note of this if this is the case so that the CoCRM is aware. When in doubt, reach out to your local CoCRM focal point for further advice.

### **Code of Conduct and SEAH training**

It is essential that all staff receive training on their roles and responsibilities regarding the Code of Conduct as well as SEAH. Staff awareness raising and ongoing capacity building are effective cultural change tools and promote a safe and mutually respectful working environment.

Training should reinforce the obligation to report SEAH/misconduct directly to the CoCRM. Staff members should understand the rationale for the CoCRM and the importance of maintaining confidentiality.<sup>141</sup> Training should inform staff at all levels about safeguarding policies, codes of conduct and the global CoCRM to report misconduct, as well as the implications of breaching these standards.<sup>142</sup> DRC can use various communication methods to remind staff of these commitments and reinforce training content, such as displaying the Code of Conduct and related SEAH information prominently in offices and community centres and by inviting expert speakers or organising discussions on the topic.

Engaging affected communities on SEAH is also critical to raise awareness on the issue and enable people to utilise available reporting channels to report abuses. For SEAH to be reported, complaints handling systems must be widely known, which requires targeted information campaigns in a variety of formats to meet the needs of people from different cultural and linguistic backgrounds, ages, genders, abilities, literacy levels and locations. Communities must be made aware of what behaviour they can expect from DRC's staff and representatives, organisational commitments made on SEAH and how to complain if these commitments are not met.<sup>143</sup> They must understand how they can raise a complaint and what they can complain about (the scope).

**Tool 15 – DRC SEAH training** offers a standardised DRC training session on PSEAH to be tailored for staff, partners or communities.

<sup>137</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p31

<sup>138</sup> Development Co-operation Directorate, *DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response*, (DAC 2019), p3

<sup>139</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), pxi

<sup>140</sup> Bond, *Core elements: a toolkit to strengthen safeguarding report-handling*, (Bond 2019), p39

<sup>141</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p27

<sup>142</sup> Development Co-operation Directorate, *DAC Recommendation on Ending Sexual Exploitation, Abuse, and Harassment in Development Co-operation and Humanitarian Assistance: Key Pillars of Prevention and Response*, (DAC 2019), p11

<sup>143</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p27

**Tool 16 – DRC CoC Training Package** summarises all in-person and online courses, training materials and resources on the CoC designed for employees, managers, People of Concern and volunteers.

### Coordination

DRC should identify and join inter-agency efforts to harmonise standards and practices in relation to the handling of safeguarding reports in the locations of operation. This is particularly important in the area of assistance to survivors, where organisations can collaborate by linking organisational referral pathways to those of other organisations operating in the area. Inter-agency efforts must respect confidentiality standards and the survivor-centred approach for SEAH report handling.

DRC will always need to coordinate with pre-existing feedback and complaint structures of the community and other agencies in order to prevent duplication of efforts and better meet the needs of the community.<sup>144</sup> To avoid creating parallel processes, DRC staff are encouraged to:

- Identify, map and document existing local and national feedback or complaint mechanisms and related support services for referral.



**Safety & Security**



**Self-determination**



**Well-being**



**Privacy & Confidentiality**

- Ascertain if there is a dedicated inter-agency feedback and or complaints system (dedicated to SEAH and/ or GBV) and consider if it is appropriate for DRC to participate, which will mean agreeing to common standards and procedures.

### DRC's 3 Step SEAH Response

**Survivor-centred assistance promotes respect, safety and security, self-determination, well-being, non-discrimination, privacy and confidentiality to ensure holistic care and support according to the needs and wishes of survivors.**<sup>145</sup>

DRC adopts a survivor-centred approach to managing all feedback, which prioritises the affected person's wishes, safety and well-being at all times. To encourage consistent messaging to prioritise support for the survivor in line with their stated preferences and needs, the below three-step summary has been developed to guide staff receiving disclosures of SEAH to follow correct procedures. All components should happen simultaneously and be coordinated.

<sup>144</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p29  
<sup>145</sup> IFRC, *Manual on Prevention and Response to Sexual Exploitation and Abuse (PSEA)*, (DFID et al), p30

### 1. Prioritise support for the survivor

- Offer protection assistance if this is in line with the wishes and needs of the affected person. Referrals to services must only be undertaken with the person's informed consent.
- If report involves alleged conduct of DRC staff, prioritise referral to external organisations outside of DRC to limit conflict of interest. If DRC is the only actor providing the necessary support service in the area, refer within DRC.

### 2. Report immediately and directly to DRC's HQ Code of Conduct Reporting Mechanism

- Everyone has a duty to report internal suspicions of misconduct and the survivor should be informed of this obligation. SEAH must be reported immediately and directly to the CoC Reporting Mechanism at the HQ Gate B level.
- If this is not possible, you can report it to your manager or HR representative for appropriate action on their behalf, or to the local Gate A CoC Registrar/team.
- The CoC team will prioritise the safety, well-being and wishes of the survivor before taking any action. Submitting a complaint does not guarantee that a formal investigation will take place.

### 3. Reports to the Code of Conduct reporting system of external agencies

- If the report involves suspicion of a CoC violation by another humanitarian actor, e.g., a UN agency, INGO or NGO, the obligation to report only applies in relation to the alleged misconduct of DRC staff.
- If the report involves another organisation, staff must obtain the survivor's consent to report this to the reporting mechanism of that organisation or, in the absence of an official reporting system, to the local PSEAH network.

### Tips for managing sensitive disclosures

DRC staff receiving any type of sensitive feedback should listen carefully to the reporting person, showing that they take what has been shared seriously. It is good practice to provide field staff with tip-sheets so that they can easily report through the correct procedures during the intake of a sensitive complaint.<sup>146</sup> This can be further reinforced during

CoC or PSEAH training. The goal should be for staff to make the reporting person feel listened to, respected and understood; they should also know that they should not discuss the case with colleagues, back at home, or within their community. Below is a summary of tips for staff to keep in mind when receiving sensitive feedback.

<sup>146</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p43

### «Important tips for managing disclosures of sensitive cases»

- Ensure that you are in a safe place to discuss the report
- Listen without judgement or questioning their account
- Believe and validate their experiences
- Be considerate and sensitive
- Do not offer a timeline
- Keep it confidential
- Do not ask for additional evidence
- Do not investigate
- Report it directly to the CoCRM.

**Tool 17 – Tips for managing disclosures** is a standardised DRC tip-sheet for all staff to reference if they ever encounter or receive sensitive feedback.

#### Process for reporting suspected misconduct and SEAH to donors

Confidentiality is a key principle of the survivor-centred approach, and informed consent is a crucial element to ensure that survivors can decide in an equal power relation what information is shared, and with whom, in order to support their well-being and requests.<sup>147</sup>

Some donors have their own misconduct forms or templates to follow, and DRC staff must use these as per the requests of the respective donor. When completing donor reports, staff must be mindful to respect confidentiality as well as the European Union's (EU) General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) on personal data and privacy. This means the donor report must not contain any personal data or information that will divulge the identities of

any complainants, survivors, witnesses or anyone (staff and non-staff). Some donors may be persistent in their efforts to request this, but this must be resisted as DRC has a solid legal basis to do so, and most importantly does not want to be at odds with the survivor-centred approach. Donor forms should only be handled by dedicated CoC staff to further uphold confidentiality. Therefore, staff should request support from their local CoC team members to manage this.

**«Important» Avoid sharing personal identifiable information with donors who are not directly providing support to the survivor, or addressing the case, to ensure a survivor-centred approach and confidentiality.<sup>148</sup> Personal identifiable data contains explicit information about a person's name, age, gender, ethnicity, sexual orientation, biometrics or other personal details. Even referring to a staff member's specific job title or position can be seen as personal data and should be avoided.**

Where there are no unique templates from donors, and instances of reported suspected misconduct like SEAH have been made, DRC's standard reporting donor template should be completed and shared with the relevant affected donor. The design of this donor template inherently discourages the recording of personal data. DRC uses this form for reporting any misconduct or suspicion thereof involving DRC staff or representatives (e.g., implementing partners) subject to the standards of DRC's Code of Conduct, Safeguarding and Anti-Corruption Policies. When it is completed, the following must be adhered to:

- Donor reports should only be completed by the Authorising Officer (AO) who is part of the CoC Intake Committee.
- The donor report should be reviewed and signed off by the relevant management, usually this is the Country or Regional Director. This should not be shared with the broader Senior Management Team (SMT) unless they hold CoC responsibilities.
- Grants management teams should not be responsible for submitting and completing this donor report due to reasons of confidentiality. Instead, a member of the grants team might train a member of the CoC team on how to do this. If this is not possible, the Grants Manager should complete this task only after signing a declaration of confidentiality (see **Tool 21**).
- Where there is pressure from the donor to provide more explicit information in the donor report, only the relevant management, e.g., Country, Regional or relevant Directors at HQ have the authority to authorise this – not the Gate A or Gate A+ CoC staff members.

**Tool 18 – DRC Code of Conduct Standard Donor Reporting Form** is a standardised tool to report misconduct, including SEAH, to relevant donors as appropriate.

#### Engagement in PSEAH Networks

PSEAH Networks are the inter-agency body in humanitarian contexts tasked with coordinating across organisations in-country on PSEAH prevention and response. They also play a role in building the capacity of PSEAH within organisations. Most of their efforts focus on advocating for agencies to fulfil their prevention duties, aiding them to do so and coordinating these efforts so that messages are consistent. PSEAH networks work towards a measurable work plan, with agreed goals and measurement of indicators informed by identified contextual risks and considerations. A robust PSEAH network is essential to support strong organisational structures for PSEAH. They consist of member organisations to encourage collaboration on PSEAH and exchange of current practices and learning. They are a forum to ensure buy-in of all stakeholders in-country to agree on appropriate PSEAH mitigation, reporting measures as well as referral pathways for survivor assistance services.<sup>149</sup>

DRC should coordinate with PSEAH networks and other agencies on designing and promoting prevention measures. It is important for DRC to join inter-agency efforts to harmonise standards and practices in relation to the handling of PSEAH reports in specific locations. Inter-agency referral mechanisms linking survivors to services of other organisations must respect confidentiality and be underpinned by a survivor-centred approach.

<sup>147</sup> Danish Refugee Council (Arnau de Frutos, C.), *The Survivor-centred Approach in the Response to Reports of Sexual Exploitation and Abuse*, (DRC 2020), p13

<sup>148</sup> Bond, *Core elements: a toolkit to strengthen safeguarding report-handling*, (Bond 2019), p45

<sup>149</sup> International Organisation for Migration, *FAQ on inter-agency PSEA: IOM's lessons learned from PSEA implementation in-country*, (IOM 2020), p8



«Important» PSEAH networks in-country should work with GBV coordination mechanisms to ensure that SEAH survivors have access to services. They have a responsibility to ensure that SEAH survivor assistance mechanisms are in place, which ideally should build upon existing GBV services and referral pathways to harmonise service provision and avoid creating parallel SEAH-specific service structures.<sup>150</sup>

Inter-agency PSEAH networks do not create separate services for survivors, nor are they responsible for providing assistance directly to survivors. PSEAH stakeholders do need to make sure that survivors of SEAH have access to services that already exist. In most contexts, members of a GBV sub-cluster will provide direct assistance to survivors of SEAH as they offer the specialised services that SEAH survivors often require, with due consideration for confidentiality and the survivor's safety.<sup>151</sup> This is as per the IASC GBV Guidelines, which state:

“PSEAH is an important aspect of preventing GBV and PSEAH efforts should therefore link to GBV expertise and programming – especially to ensure survivors' rights and other guiding principles are respected.”<sup>152</sup>

«Important» Suspicions of SEAH misconduct involving a DRC staff member, shall reach the DRC CoCRM directly. Once reported to DRC CoCRM, the suspicions shall not further be reported to any external complaint mechanism. If such networks are persistent, staff should reach out to the global CoC team for further advice and support. DRC can refer an allegation regarding a perpetrator of another organisation to a PSEAH reporting mechanism and/or the equivalent Code of Conduct reporting mechanism of that agency, but only with the informed consent of the survivor.

150 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p30

151 International Organisation for Migration, *FAQ on inter-agency PSEA: IOM's lessons learned from PSEA implementation in-country*, (IOM 2020), p9

152 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p62

### Step 3.6 Referral processes to external agencies and service mapping

*Core Humanitarian Standard Organisational Responsibility 5.7: Complaints that do not fall within the scope of the organisation are referred to a relevant party in a manner consistent with good practice.*

A CFM relies on an internal and external referral system to function effectively and close the loop. Accordingly, if not already in place, it is critical within the CFM set-up that an internal system for referring complaints is established. This can also be obtained by reaching out to inter-agency cluster systems across different sectors for current service mapping lists. Mishandling feedback will reflect poorly on the credibility of the CFM, as well as other humanitarian actors and our collective reputation.<sup>153</sup> The establishment of referral systems and ensuring staff have the internal capacity to do so in line with local inter-agency standards and protocols will contribute to creating respectful and responsive interventions collectively.

#### «Important» if a referral system is not in place:<sup>154</sup>

- The affected population may lose trust in the CFM and/or the work of DRC and other agencies
- Reported cases will remain unaddressed without the necessary support provided to the complainant and or disciplinary/prevention action taken
- DRC cannot be accountable to affected populations.

153 Ibid.

154 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p62

155 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p20

156 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p62

«Important» referrals (for both non-sensitive or sensitive feedback) should only take place with the informed consent of the affected person, which requires a thorough explanation of how and to whom their details will be shared, the service they are being connected to and why, and the known advantages and limitations of this service.

When DRC receives feedback outside the control of its ability to influence or ability to handle, this should be explained clearly to the complainant and, where possible and in agreement with the complainant, referred on to the appropriate service provider or actor. Coordination with other agencies and sectors will be required if this is to function effectively.<sup>155</sup>

Regular mapping exercises will need to be carried out in each location on the availability of local response services to establish referral pathways. Up-to-date service mapping lists can usually be obtained by the cluster/sector leads coordinating that response in a specific area (e.g. shelter, CCCM, WASH) so that feedback can be forwarded to the relevant agency.<sup>156</sup> DRC staff conducting referrals will need to follow all corresponding inter-agency referral protocols and tools, and these will need to be conducted mostly by trained CFM who are at the receiving end of the majority of formalised feedback channels.

**Referring non-sensitive feedback**

A response that relates to a broader humanitarian assistance provision issue (non-sensitive feedback) should be recorded and transferred directly to the relevant organisation, service provider or the cluster/sector coordinating the response so that it can be forwarded to the appropriate agency. Referrals to other agencies need to take place in a timely manner, which will preserve the credibility, and thus the usage, of the CFM. DRC can also offer the reporting person the contact information of the appropriate agency and encourage them to contact the respective organisation directly to share their feedback. However, if they ask to be referred, DRC should oblige and request permission from that person to share their feedback and contact information with the relevant stakeholder.

It is possible for CFM staff to maintain records of the non-sensitive feedback and referrals made. Once referrals are made to relevant service providers, they can be marked as 'closed' and all actions taken including what, how, where and when it was referred and to whom should be recorded. Whilst the CFM cannot address all concerns, it should note trends in feedback and use the documentation of these to work with other actors to advocate for additional services where gaps emerge. Therefore, recording referrals, in addition to other types of feedback, is important.<sup>157</sup>

It is also good practice for DRC CFM staff to track and ensure that non-sensitive referrals are being followed up with the agency or the PoC directly (where consent is obtained), to contribute to a more comprehensive system of accountability. DRC can also record the status of referrals undertaken; this ensures the person's needs were adequately handled, which will help staff to have sufficient oversight of referrals.<sup>158</sup>

<sup>157</sup> Ibid., p100

<sup>158</sup> Ibid., p62

<sup>159</sup> IFRC, *Survivor-centred approach in prevention and response to sexual exploitation and abuse* [ppt] Tina Tinde, PSEAH Advisor, (IFRC 2018), retrieved from this link (accessed December 2021)

<sup>160</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), pp62-64

**Referring sensitive feedback**

Where sensitive feedback involves the alleged misconduct of a DRC staff member or representative (**Category 5**), these should not be recorded at all within CFM systems but should be referred immediately and directly to the global CoCRM. In order to avoid a conflict of interest, referrals to support services involving any misconduct of DRC staff should prioritise external existing support services or other relevant actors operating within the response.<sup>159</sup>

Where DRC receives allegations of misconduct or SEAH in regard to another humanitarian actor (**Category 6**), it should be reported to that agency's equivalent Code of Conduct reporting system or to the unit directly responsible for investigations within the agency. If there is no such unit, it can be referred to their management or appointed focal person for receiving feedback and complaints. DRC can identify this information through local PSEAH networks or GBV coordination mechanisms. Reporting to these mechanisms should only be conducted when it is in line with the needs and wishes of the survivor and informed consent is provided.<sup>160</sup>

For protection issues reported through the CFM (**Category 4**), it is important to prioritise support and immediate localised protection assistance for the affected person. This should be done through established referral pathways and ongoing programmes offering the needed support within the broader humanitarian response.



If DRC provides the service, it can be referred to the field-level Protection Manager or team leader of that area. CFM staff or the field-level Protection teams can conduct external referrals themselves; this will depend on the resources available, set-up and context. A list of primary Protection focal points across all sites should be developed, and updated by the Protection Manager, for CFM staff so they know who to refer the matter to for appropriate follow-up. This will also ensure that support for the complainant is prioritised. CFM staff can record at a minimum the date, time, feedback category and action taken to refer these cases, but no details of the incident or personal information should be recorded into the CFM database.

**Complaints received in relation to local authorities or parties to a conflict**

Feedback received in relation to authorities and or parties to a conflict is extremely sensitive and again, as per **Category 4**, no exact details of such cases other than category and date should be recorded via the CFM. They should be shared with Protection Managers and or the Country Director, and responses to such feedback will be at their discretion. This will allow the CFM, Protection Managers and SMT to observe trends and patterns within a location, and make targeted adjustments based on the needs of the affected community.<sup>161</sup>

<sup>161</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p129

## EXAMPLE FROM THE FIELD



### DRC Greece: navigating negative feedback about authorities

DRC has been active in Greece since November 2015. DRC entered Greece as a part of a joint emergency response to the influx of refugees and migrants reaching the Greek islands via the Eastern Mediterranean Migration Route.<sup>162</sup> The CFM was designed and implemented in 2019, starting with pilot projects that were then rolled out across the country. Greece houses many contextual challenges, which make CFM implementation difficult. The displaced population is transient, Greece being a transit country for many displaced persons to move elsewhere within Europe, and there are more than 18 languages to support, which creates significant obstacles in access and resourcing of the Greece CFM.

At the time of writing, DRC's primary role is to assist the Greek government in providing basic services to PoC. Because the government has not always had a presence in the sites hosting refugees, DRC's role as the provider of Site Management Support (SMS) increases complexity in owning systems, authority in making camp-related decisions and dealing with complaints that are often about the Greek authorities rather than DRC. The perception of DRC's role amongst affected populations is often blurred as they are often unaware of the scope and limitations of DRC's work and perceive DRC as the official site manager. This can reflect poorly on DRC.

In this context, DRC is extremely constrained in its ability to respond to feedback from communities in need of a range of essential services that are ultimately the responsibility of government agencies. The CFM has been an opportunity for the country office to explain the scope and responsibilities of DRC and those of other actors.

Previously, feedback about the authorities and other actors was usually passed onto the site managers to respond to in a targeted and politically sensitive manner. There was no official recording and collation of the concerns raised or internal accountability to follow up. DRC Greece is now attempting to systematically compile and secure such feedback via an appropriate CFM information management system which will strengthen the ability of DRC Greece to advocate to the relevant authorities to address the gaps in services and consider more people-centred solutions to displacement.

Other humanitarian actors have been phasing out activities in sites because of a lack of available funding to continue operations. Hence, many sites are in the process of being handed over to the Greek authorities to provide the required services to affected people. It is critical that a CFM system is in place during this transition period to offer data-driven evidence and insights (as appropriate) on the vast and diverse needs, gaps and priorities of the communities we aim to serve.

<sup>162</sup> Danish Refugee Council, *Where we work*, (DRC 2021), retrievable from this link (accessed December 2021)



### Options for when services are not available

DRC may operate in areas where formalised referral pathways and coordination mechanisms are not in place. Where this is the case, DRC should prepare the CFM to adequately deal with all types of feedback based on our knowledge of existing services and the expertise of other actors.<sup>163</sup> The country operation must also make a decision based on principles of DNH and whether it is appropriate to roll out the CFM in areas where we may only have a short-term presence and/or where we know there are limited services to refer people to - for example in extremely remote locations or areas with limited access. The best interests of communities are served when agencies and service providers work together to provide holistic care. If this is not possible, it may better to limit the CFM modalities offered to communities, for example by only offering face-to-face modalities during distributions to serve communities in

<sup>163</sup> Bond, *Eight Principles for Building trust through Feedback*, (Bond 2016), p7

contexts where we may only have a short-term operation. If DRC decides on a limited number of short-term modalities in a location, such as help-desks, it is important that DRC remain honest about the scope of feedback it can handle. We must also ensure that there are enough staff to manage and answer the potential quantity of feedback received.

CFMs still serve a purpose in areas where there are limited services and it is important that DRC remain transparent about what it can and cannot provide, including its own services and ability to refer feedback. CFM staff receiving requests for assistance where relevant services are not available can monitor these and any gaps in assistance coverage. This information can also be shared with relevant sectoral teams, who can decide when and how to coordinate with appropriate clusters, working groups and other actors to mobilise resources to address them.

## EXAMPLE FROM THE FIELD



### DRC South Sudan: always be guided by do-no-harm

At the beginning of its CFM pilot roll-out, DRC South Sudan moved swiftly to ensure that its newly set up phone hotline was communicated to communities in as many locations and projects as possible. DRC was engaged in mobile emergency assessments and responses with newly internally displaced people. These responses, being of short-term nature, required the provision of rapid and immediate emergency assistance in extremely hard-to-reach locations. There were not always other local services or partners present in these locations, and where they were, they were hard to reach to conduct timely referrals because of the remoteness of these locations.

Initially the phone hotline was used as a blanket modality and shared with all affected communities across all DRC's selected pilot locations and programming. For the mobile response teams, this meant that people were contacting DRC well after DRC had left that community, which resulted in staff operating the phone hotline receiving a number of requests, some of an extremely sensitive nature. DRC's absence and limited ability to act may have had a negative impact on DRC's credibility, trust and acceptance amongst people affected by crisis. It was also not ideal for the mental well-being of staff on the receiving end of such distressing calls. While the CFM and programme teams made sure that the feedback received was referred to relevant partners still present in these locations, the additional time and resources required to work on these cases was not anticipated and was unsustainable.

The country office soon decided that it was not appropriate to roll out the phone hotline within the mobile response teams because DRC was not present for long enough in these areas. Instead, they considered adapting their approach for these projects to boost the number of staff present at help desks during project activities to be able to resolve any feedback instantaneously with an in-person presence. They discontinued disseminating IEC materials promoting the phone hotline, which were circulating in communities long after DRC had left.

Mobile response teams then worked to improve their ongoing assessments and service mapping lists so that local referrals could be strengthened. Additionally, when carrying out CFM help desk activities, the purpose and scope of the system was clearly explained so that false promises about assistance needs were not made. Staff aimed to be transparent about their mandate, short-term presence and support capacity, so what DRC could and could not deliver was clear to affected populations. Any request needs outside the scope of the services provided by DRC were also noted by relevant protection staff, who could raise these issues with relevant coordination networks when safe and appropriate to share for advocacy purposes.

In summary, the team learned the importance of appropriately assessing the context, availability and reliability of existing support services and the risks of not being able to close the loop adequately and promptly before rolling out the phone hotline. CFM teams also needed to consult more with communities, programme teams and local staff to develop more contextually appropriate feedback modalities for each unique location and implementation activity.

### Obligations to report instances of misconduct within national legal frameworks

In some contexts, when incidents of misconduct such as theft, fraud, corruption or SEAH constitute a criminal offence, it will be the decision of the investigating agency (DRC's CoCRM Intake Committee) together with the Country, Regional or relevant Directors at HQ to refer cases to the relevant law enforcement authorities in line with internal procedures appropriate for the country context.

«**Important**» The decision of DRC to refer a case to the national authorities must take into account the consent of the survivor/complainant, who may not wish to do so. This may be in conflict with the mandatory reporting laws, especially laws related to SEAH incidents, and DRC should prioritise principles of the survivor-centred approach at all times to minimise harm to the affected person.<sup>164</sup>

It is the responsibility of the Safety or Security focal point, CFM and Protection Managers to be up to date on relevant national laws and to incorporate them into referral procedures and information packages for survivors/complainants, as appropriate.<sup>165</sup> DRC must be extremely careful before reporting anything to national authorities, as their sanctions may be disproportionate or take action against survivors themselves.

### Step 3.7 Closing the feedback loop with individuals and communities

DRC has a responsibility to close the loop and notify the complainant in a safe and timely manner about the outcome of their feedback. DRC must make sure that the response is not just communicated but also understood by the complainant.<sup>166</sup> **Closing the feedback loop is vital for:**

- Maintaining trust and acceptance with communities and in the CFM mechanism itself
- Demonstrating transparency with actions taken by DRC to resolve shortcomings or safeguarding breaches
- Avoiding any misunderstandings and providing an honest explanation as to why a specific decision or action was taken<sup>167</sup>
- Facilitating participation of communities as active agents in reshaping the strategies and approach of how humanitarian assistance is provided.

As a general rule, all non-sensitive feedback should be responded to and followed-up within 7 to 14 working days of receiving the feedback. This will depend on the urgency of the matter raised and amount of incoming feedback. If this time frame is not possible, CFM staff should let complainants know when they can expect a response and maintain oversight of how the issue is progressing within programme teams.

«**Important**» Time frames will vary in different responses and at different stages of a response, thus time frames should be reassessed.

164 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p69

165 Ibid., p68

166 Danish Refugee Council, *Complaints Mechanism Handbook*, (DRC 2008), p7

167 Ibid., p44

The time frame for resolution should consider the location (remoteness), connectivity and realistically how long it will take to obtain feedback, take action and share outcomes with communities in hard-to-reach areas; and/or the time required to reach other agencies for follow-up. Staff should also take into account the feedback modality and frequency at which feedback can be collected, processed and then resolved (e.g., complaints and suggestion boxes), so time frames will need to align in order to be able to adequately close the loop.

Depending on the setting, DRC CFM teams will need to work with communities and programme staff to ascertain the most appropriate way to close the feedback loop; this can be done in different ways for non-sensitive feedback. CFM staff are primarily responsible for informing the complainant about the outcome of the issue raised where this is received through formal feedback channels. Wherever possible, the complainant should be informed of the outcome individually. Other programme teams or CFM project focal points may also be responsible for explaining the actions taken and status of the feedback raised if the matter is more nuanced and requires more detailed explanations by responsible personnel directly.

Responses back to the complainant can be provided directly in person (e.g., via help desks or household visits), by phone or in writing – this will only be possible where there is capacity of the CFM staff to do so, and the feedback provider has consented to share their contact details. There are alternative ways to close the loop if there is limited staff capacity, no requests for and/or no need to provide individual feedback about recurrent and common feedback queries. Some examples include:

- **Mass communication:** via information boards, radio, video, social media, SMS/other messaging distribution services. This method would be appropriate for concerns repeatedly raised through CFM systems that affect the community at large and can be easily addressed through the most contextually appropriate communication mediums. All communication with communities must be offered in a variety of formats (e.g., verbal and written) to account for varying literacy levels, languages and the most trusted and preferred communication channels of that community. Communication must consider age, gender and diversity and be adapted accordingly for the target audience. Dissemination of sensitive information through these channels should be avoided.
- **Community meetings or consultations:** can be used to directly respond to feedback from a specific target population to transparently offer information about actions taken by DRC to address concerns. Such avenues are also useful when further consultation or dialogue is required to be able to collectively decide on solutions. Individuals who shared their personal information should never be referred to in such public forums.

For all sensitive complaints responses will need to be handled by the specialised agency directly involved in the follow-up.

«Important» All sensitive feedback will need to be acknowledged and referred immediately to the responsible entity – within 24 hours as is possible. Further, all sensitive feedback must only be closed, and outcomes communicated back to the complainant, by the relevant entity responsible to assure it is handled with specialist expertise and with the uttermost care and confidentiality.

In summary, CFM (or relevant programme staff) can close the loop and get back to all complainants in regard to all non-sensitive feedback pertaining to DRC's programmes, actions or decisions. However, they or other DRC staff should never close the loop with complainants in relation to protection issues or complaints involving the misconduct of DRC or other agency staff. All CoC matters raised should remain within the DRC CoC Intake Committee, and likewise protection cases, management and outcomes must remain within protection teams or other appropriate support services.

«Important» The CFM team primarily play a role in ensuring sensitive feedback categories are triaged appropriately and successfully referred to the appropriate entity for follow-up. They, and other DRC staff members, should never intervene in the resolution of sensitive feedback.

## Step 4 Protect and respect: build trust and confidence in your feedback mechanism infrastructure

*The system: data responsibility, confidentiality and informed consent*

When defined policies and processes have been established to respond to feedback in an effective, safe and timely manner, care must be taken to ensure that how information from communities is collected, processed, analysed, stored, shared and used respects confidentiality and protects data that might directly, or indirectly, identify an individual.

Data responsibility, defined as the safe, ethical and effective management of personal and non-personal data should be a major focus in the design of any CFM information management system (IMS).<sup>168</sup> This section explores the importance of data responsibility, confidentiality and informed consent in order to protect and respect information received from communities as a fundamental element of DRC's duty of care to people affected by crisis, and an essential part of upholding the CHS.<sup>169</sup> Information that is gathered at any part of the project cycle should be handled with care and this is equally important when collecting and documenting feedback.<sup>170</sup>

Part of an effective CFM is an appropriately safeguarded IMS with informed consent, safe and ethical sharing practices and data security measures built in. These must also be considered when working with other actors, partners or civil society organisations who have a responsibility to respond to issues raised, or when deciding to take part in an inter-agency CFM mechanism.

168 Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p30

169 CHS Alliance, *CHS Guidance Notes and Indicators*, CHS Alliance; The Sphere Project; Groupe URD, 2015, p20

170 Ibid.



#### Step 4.1 Design your feedback form

Once received, CFM teams will record feedback on a feedback form (hard copy or online), in a logbook, or directly into a database. If feedback is received offline, it should be recorded into the same IMS for CFM staff to monitor, refer and respond to as appropriate.

DRC has an opportunity to embed informed consent and transparency into the design of a feedback form by prompting the staff member receiving and recording the feedback to:

- i. Request consent to **record the feedback** (and contact information where needed)
- ii. Seek consent from the complainant to **share and refer their feedback** and/or contact information to relevant internal programme staff, or external agencies as required
- iii. Inform the complainant of the staff member's **obligation to report the issue to the CoCRM** if it involves the misconduct of a DRC staff member, partner or representative.

Where feedback is entered using online digital data collection methods, this paperless format can limit the risk of data being misplaced. Online forms may also contribute to greater efficiency and thoroughness in the data collection process by significantly cutting down on human error and improving quality control. Whilst they can also enable data collection offline, data cannot be shared with CFM teams until the device

has access to an internet connection to synchronise data. Where trained staff are responsible for receiving feedback in a hard-copy format (via help desks, community meetings or other face-to-face formats), this should be entered at least daily into the IMS for records management purposes. The paper copies should be destroyed soon afterwards to protect personal data of affected people.

The feedback form should be developed in line with DRC's feedback categories and **exclude Category 5** for reports of suspected DRC misconduct to avoid any potential double-handling and processing. It is good practice to record categories consistently, so they are easy to track and analyse afterwards. As the system becomes operational and patterns start to emerge about the most common types of feedback, this information can inform the revision of the feedback form. The system will then be more effective by continuously considering which questions to ask and how to better formulate and structure them.

Feedback forms should be designed to link to the broader CFM IMS. Note that when referencing the term IMS, this is not always a software solution. An IMS will be in place regardless of whether you are using paper, Excel or custom CFM software, as it encompasses any kind of data collection, storage, processing, analysis, sharing, use, retention and/or destruction. The IMS should be overseen and updated by trained CFM staff or CFM project focal points. Access should always be restricted to a limited number of authorised staff for the purposes of resolving non-sensitive feedback.

Below is some general advice for the core content that should be included in feedback forms.

- Unique number/serial number
- Time stamp/date
- Position/department or name of the staff member receiving feedback
- Consent to record feedback and contact information
- Location where feedback is recorded
- Type of feedback modality
- Basic complainant personal contact information (e.g., name, age, gender, phone number) - *only record if the person requested to be contacted and consented to sharing this*
- DRC feedback categorisation
- Breakdown of sectors
- Breakdown of common non-sensitive feedback raised within each sector
- An open comments section for further elaboration
- Consent to refer the feedback to internal personnel or external support service
- Prompt to inform the complainant that if feedback involves a report of suspected misconduct of DRC staff, this must be reported to the CoCRM, with reassurance that this does not mean that an investigation will necessarily proceed.

**Tool 19 – Formalised feedback form** is a standardised DRC feedback registration form covering a range of sectors. This can be used as a basis for the design of how feedback is recorded. Such a form should be connected to the corresponding IMS in place and will be useful for staff receiving feedback through more formalised feedback channels.

#### Everyday informal feedback

The relationships between humanitarian staff and communities are often the preconditions for understanding the local context and community perspectives.<sup>171</sup> When DRC staff successfully build relationships with affected people, they also build trust. Trust is the central prerequisite for a CFM mechanism to work. When people trust our staff,

they are more likely to be forthcoming with feedback, especially feedback that is unsolicited and unexpected. CFM teams should encourage and support field colleagues to consistently document the informal feedback they receive from communities. All too often informal feedback is often left unanswered and it is rarely recorded in a systematic way. This can be overcome by providing simplified feedback forms that allow field staff to concisely capture informal feedback on a regular basis for subsequent processing by CFM teams.

Forms for internal feedback should be kept to a minimum number of pages. All staff will need to be trained and frequently reminded to return these 'everyday' feedback forms in a safe manner to CFM teams so they can include them in their feedback analyses and reporting. With more consistent and comprehensive feedback data, including informal feedback, it will be easier to understand the types of concerns surfacing within communities and ensure responsiveness to needs.

171 Degett, A., *Preliminary Assessment Findings: Participation of Persons of Concern in Humanitarian Action*, (DRC 2018), p9

**«Important» Where informal sensitive feedback is received, all DRC staff including partners, volunteers and incentive workers should be trained to report any suspected misconduct directly to the CoCRM. Where they may not have access to the digital means required to do this, the contact details of the CoCRM focal points, or field office HR manager should be readily available for frontline staff to safely and directly report suspected misconduct. At the very least they should inform their manager, who can then escalate it to the official CoCRM complaints channels.**

DRC has an opportunity to cultivate a culture of valuing and respecting informal feedback. If this is overlooked, DRC risks not being able to capture community perspectives that would otherwise remain unknown and unresolved. This can lead to gaps in feedback data, trend analysis and reporting, which can affect communities affected by crisis and DRC because the delivery of assistance may continue without the necessary adjustments. This means that DRC may be less able to adequately address emerging needs. To avoid this, field staff, from managers right through to volunteers, incentive workers and drivers, are encouraged to always have access to a means to record feedback (either hard-copy or online format) to assist in proactively, rather than reactively, collecting the more daily informally expressed needs, queries, concerns, preferences and challenges facing the communities we serve. See **Tool 20** as an example of a simplified feedback form that can be integrated and used across all programmes and activities of DRC.

**Tool 20 – Everyday Informal Feedback Form** is a simplified form to guide staff to record the informal feedback received in their daily interactions with communities. These forms must be kept in a secure place and not shared with anyone except the CFM teams for official processing.

#### Step 4.2 Safe, ethical and effective data management<sup>172</sup>

Poor data management and any disclosure of data (intentional or not) can cause harm. There are always risks that data collected by DRC may be accessed by other parties and used for harmful purposes, such as surveillance, repression or targeting.<sup>173</sup> How we manage data must also consider how to ensure equal reach when access to devices and network connectivity is limited, as well as alternative ways to continue monitoring feedback if and when technology fails. Any IMS should be tested and adapted in response to user feedback and the operational context. A weak IMS can increase the risk of failing to respect users' privacy or increase frustration in communities when feedback is not adequately acknowledged or responded to as a result of poor data management.<sup>174</sup>

**«Important» It is of paramount importance for DRC to handle data responsibly when managing, producing or sharing data – doing so will build the trust of communities and respect the rights, safety, dignity and privacy of People of Concern providing feedback.<sup>175</sup>**



CFM teams should record, process, analyse, store, share and use feedback in a centralised database. Records should be made of what feedback was received, when, where and by whom as well as all actions taken by programme and CFM staff to resolve it. Personal data should be kept to a minimum based on need, necessity and consent and may include: an individual's name, relevant registration number, email address, contact phone number, location or another identifier that can be looked up in a database to identify an individual for the purposes of resolving their feedback.<sup>176</sup>

**«Important» Personal data relates to an identified or identifiable person (data subject).** Personal data is not just a name or phone number, it can include separate qualitative or quantitative data sets disaggregated to a specific location or demographic, which may identify certain individuals or groups.<sup>177</sup> For example, in some rural communities, the location data alone may be enough to identify someone. Additionally, in small towns where qualitative feedback is collected, although it may be anonymised, there is a high risk that a particular person can still be recognised in the data.

<sup>172</sup> Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p30

<sup>173</sup> UNICEF, *Accountability to Affected Populations: A handbook for UNICEF and partners*, (UNICEF 2020), p88

<sup>174</sup> Plan International, *Child-Friendly Feedback Mechanisms: Guide and Toolkit*, (Plan International 2018), p32

<sup>175</sup> IFRC, *Feedback Starter Kit*, (IFRC 2019), p7, retrieved from this link (accessed December 2021)

<sup>176</sup> Ibid.

<sup>177</sup> Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p30

DRC must prioritise data responsibility, by ensuring the **safe, ethical and effective management of personal and non-personal data**. This includes ensuring that data practices are:

- **Safe:** Data management activities ensure the security of data at all times, respect and uphold human rights and other legal obligations, and do not cause harm
- **Ethical:** Data management activities are aligned with the established frameworks and standards for humanitarian ethics and data ethics, e.g., the Protection Information Management (PIM) framework
- **Effective:** Data management activities achieve the purpose(s) for which they were carried out.<sup>178</sup>

«Important» **Any data collected that is linked to a person requires special protection and measures that must be reviewed frequently to account for rapidly changing environments.** DRC must future-proof policies and procedures to protect against unforeseen risks, including the need to immediately evacuate a country or location. DRC must never overlook such dangers and ensure that any data that is collected can be safely stored and periodically deleted and is not traceable or accessible by third parties after agreed periods of time, e.g., banks or mobile phone operators who facilitate cash transfers.

The IMS should be able to ensure that all data remains in a system using the highest security standards. DRC country offices are encouraged to invest in an IMS that can set limits on the amount and type of information users can gather, access, edit and delete, so that staff in different locations, and across different roles, will have different permissions. This will help ensure that access is contained. Even when paper-based systems are being utilised, in part or in full, data security still needs to be maintained in the form of locked filing cabinets, rooms and offices. This can also include regulated access to offices and structured archiving systems. For online systems, useful IMS features to consider for the management of a CFM system include:

- **Centralised** databases
- **Data security** functions offering internal controls, passwords, permissions and encryption
- **Automation of actions and alerts** to be informed about different feedback categories, actions required or unresolved feedback that has exceeded standard response times
- **Real-time data and analysis** enabling access to key information and reporting instantaneously
- **Continuous data protection or real-time back-up** capabilities to ensure that versions of the data are automatically saved and retrievable during specific time periods
- **Cloud storage** ensuring that data is only accessible to limited and authorised users (and not stored directly onto laptops in the event that equipment is stolen or lost)
- **Compliance** with GDPR or other compliance requirements to ensure the highest level of protection
- **Adherence to industry accepted best practices** and standards as emerging in data security.

The hardware used to run the IMS (e.g., laptop, phone, tablet, server, etc) must also be adequately protected. Staff should ensure that they lock equipment when not in use with password-protected devices.

«Important» **Some communities not exposed to information technology may find the use and display of hardware devices to collect feedback suspicious or intimidating. Therefore, DRC should always assess and utilise the technologies communities are familiar with and trust or explain their usage when collecting feedback.**

#### Data protection

Working in insecure and conflict-affected areas presents a range of risks associated with the collection, processing, analysis, storage, sharing and usage of feedback data and information. DRC must, at all times, prioritise the protection of personal data collected through CFM systems to protect the privacy (of the complainant) and confidentiality of the issue being raised. Databases and any digital storage system should be appropriately encrypted and password protected as a minimum. Where necessary, any hard copies of feedback forms or feedback logbooks must adhere to internal data protection policies and procedures.

#### A note on terminology

**Data protection:** the systematic application of institutional, technical or physical safeguards that preserve the right to privacy with respect to the processing of personal data.<sup>179</sup>

**Data security:** can be seen as a key element in achieving data protection and includes the physical, technological or procedural measures that safeguard the confidentiality, integrity and availability of data and prevent its accidental or intentional, unlawful or otherwise unauthorised loss, destruction, alteration, acquisition or disclosure. Examples include restricting users and limiting access to data, password-protection, encrypting data, and measures to protect the network.<sup>180</sup>

**Informed consent:** informed implies that the data subjects should receive explanations, in simple language, on the identity of the data collector or other actor and the purpose, scope, method, intended use and potential risks of the data provision as well as the meaning of confidentiality. 'Consent' signifies the data subject's voluntary approval for the information to be used or shared as explained.

**Therefore, informed consent is voluntarily and freely given based upon a clear understanding of the facts, implications and future consequences of an action.**<sup>181</sup>

<sup>178</sup> Ibid., p7

<sup>179</sup> Inter-agency Standing Committee, *Operational Guidance: Data Responsibility in Humanitarian Action*, (IASC 2021), p29

<sup>180</sup> Ibid., p30

<sup>181</sup> Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved from this link, p11 (accessed December 2021)



Data protection procedures must be clearly outlined in a dedicated information management section in CFM guidelines and SOPs that specify how information should be collected, processed, analysed, stored, shared and used and how this data is protected and who has access. Only designated staff should be able to access and use the data collected for processing, tracking and closing of all feedback. Staff should only have access to information they require to do their job. Data protection policies and procedures should document and ensure oversight of this.<sup>182</sup> A breach in privacy or confidentiality cannot be undone and could adversely affect individuals and put their lives in danger. The below pointers are a starting point for you to think about how to better manage the risks of collecting data:

#### Data protection pointers

- Decide on and train a limited number of dedicated staff who have access to the CFM IMS and feedback files. Work with an IMS specialist to ensure that data is restricted amongst these users based on feedback categories, their respective roles and location. Ensure that they only have access to what they need to do their job and only for as long as required.<sup>183</sup>
- Understand risks by conducting a data protection impact assessment and data flow to identify and minimise data protection risks and develop risk mitigation strategies.<sup>184</sup> DRC should plan measures to protect data during all stages of data management activities, such as the collection, storage, processing, analysis, sharing, use, retention and/or destruction of data and information. Also ensure that you revise and update your IMS procedures on a regular basis to account for any emerging risks.

182 World Food Programme, *WFP Guide to Personal Data Protection and Privacy*, (WFP 2016), p5

183 Creative Commons Attribution-ShareAlike et al, *Ways to practise responsible development data*, (Creative Commons Attribution-ShareAlike 2014), p56, retrievable via this link (accessed December 2021)

184 Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved from this link, p5 (accessed December 2021)

- Only collect the data that you need, where need is described in relation to a defined purpose, and make sure you use the data you already have.<sup>185</sup> CFM and programme teams need to make sure that they balance the information they collect and do not collect more than they can handle. They will need to carefully monitor a community sensitisation plan and ensure that the CFM is promoted only as relevant and to the extent of available staff capacity to manage potential incoming feedback.
- Always seek and embed informed consent and transparency into data collection tools for affected populations about the data purpose, scope, potential benefits and risks.<sup>186</sup> Think about how you will be able to get informed consent as relevant and safe for your context.
- Reduce or eliminate the amount of sensitive data recorded, e.g., by routinely training and reinforcing the message to all staff on how to directly report suspected misconduct of staff to the DRC CoCRM.<sup>187</sup> There should always be separate storage for sensitive data that is accessible to and only managed by responsible entities, e.g., the CoCRM and protection teams.
- Consider assigning a coding system to the incoming feedback categories (and sub-categories) received (e.g., 0 to 7 for DRC); and a unique identifier for each individual feedback received so the names of individuals are not referred to in case notes for tracking purposes (this can be automatic depending on the IMS you are using).<sup>188</sup>
- Where physical data is kept via the use of written forms or logbooks in line with contextually appropriate approaches, these should always be stored in a secure location and locked at all times to protect it from

accidental disclosures such as theft, damage or loss.<sup>189</sup> Only a small number of authorised staff should have access to these records and should track when and if these are removed, where and why. Consider installing CCTV, high-grade locks and/or fences to mitigate risks.

- Consider offsite data storage, where possible, so that data can be shifted off-site physically or electronically so it is recoverable in the event of a disaster, accidental error or system crash.
- Establish formal agreements with partners and third parties on how data will be protected and review relevant legal frameworks.<sup>190</sup> Always ensure that referrals made between organisations are secure and you only provide the basic information that is needed.
- Review the PIM framework to ensure key data protection principles and best practice processes are incorporated into your IMS design, procedures and SOPs.<sup>191</sup>
- Train staff, partners and communities on their right to privacy, personal data protection and informed consent.
- When feedback data is shared publicly, it should not be traceable to a specific individual (or group of people who may be marginalised, at-risk and the target of discrimination or violence).<sup>192</sup>
- Consider how you will retain, archive and/or dispose of the data and within which time frames. This should be completed in line with GDPR or other compliance protocols based on the relevant national legislation, or audit requirements of a donor. Retention periods may vary and should be considered as appropriate for the context.<sup>193</sup>
- Dedicate separate office space for CFM teams to be able to answer feedback privately via incoming feedback channels, especially phone hotline services.

185 UNHCR, *Key Messages on Information Management in UNHCR*, p1, retrieved from this link (accessed December 2021)

186 Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved here, p5

187 Ibid.

188 IFRC, *Manual on Prevention and Response to Sexual Exploitation and Abuse (PSEA)*, (DFID et al), p29

189 Creative Commons Attribution-ShareAlike et al, *Ways to practise responsible development data*, (Creative Commons Attribution-ShareAlike 2014), p53, retrievable via this link (accessed December 2021)

190 Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved here, p5

191 Ibid.

192 IFRC, *Feedback Starter Kit*, (IFRC 2019), retrieved here, p7 (accessed December 2021)

193 Gazi, T. *Data to the rescue: how humanitarian aid NGOs should collect information based on the GDPR*, (Journal of International Humanitarian Action #5, Article No 9, (Springer Open 2020), retrievable here (accessed December 2021)

### Step 4.3 Confidentiality and informed consent

**«Important» Confidentiality is about DRC's duty to ensure that any information collected remains private, protected and hidden from others. This must be clearly explained to the individual before the information is collected.**

Personal information should only ever be collected after informed consent has been provided by the individual in question. This is also the case for referrals, both with DRC and/or to external organisations.<sup>194</sup> Where the person provides such consent, only pertinent and relevant information shall be shared with others for the purpose of resolving the feedback and assisting the individual.

**«Important» Consent may sometimes be provided because people may feel that they have to provide it, or they may be afraid of not receiving assistance if they do not provide it. Therefore, it is important that we take the time to make sure that every person clearly understands why we are requesting their consent. We must also address any concerns that arise and be as open and honest as possible. People must feel that they can trust us, it must be earned, and it can be if we make a conscious effort to manage data responsibly.**

All humanitarian actors who are part of a response should adhere to their own data protection procedures if they collect, store, process, analyse, share or use any personal data of a complainant. However, all staff, regardless of agency, are bound by strict confidentiality, which in some cases shall continue beyond the end of their employment.<sup>195</sup> Any staff member with access to sensitive information is bound by the principle of confidentiality and DRC must ensure that all CFM staff managing data sign a confidentiality agreement before they perform their duties.<sup>196</sup> Failure to uphold confidentiality and safeguard personal information of PoC or any party with whom DRC has a relationship is a breach of the CoC.

**Tool 21 – Declaration of Confidentiality and Integrity** is an example agreement for CFM staff, or any colleague who has access to confidential information related to the work of the CoCRM. It can also be adapted for any other sensitive information handling, including referral management to protection agencies.

### Sharing data

Data collected through CFMs can be useful for other colleagues, project managers and senior management, who may be addressing similar issues. Sharing of data will need to take place within DRC, and potentially with other relevant coordination fora. Where DRC is engaged in consortiums or partnerships with other actors and/or working through local partners, data sharing may be necessary as part of these joint projects for monitoring and evaluation purposes, adaptive management or donor reporting.

In cases where DRC is requested to share data with other actors as part of joint projects and/or where DRC is supporting local actors to deliver, data may need to be shared by DRC and also with DRC. In both circumstances, data sharing shall be governed by explicit data sharing agreements via a Memorandum of Understanding (MoUs) or contracts. These should articulate the relationship and mutual responsibilities of all consortium members in relation to the project, especially with regard to data responsibility.

**«Important» No data should be shared with another agency without the informed consent of the concerned individual. At the point of data capture, people should be informed of why the data is being collected, with whom it will be shared, how it will be used and how long it will be kept with DRC or its partners.**

Data sharing agreements have limitations because enforcing them is rarely simple. However, they do provide advantages in outlining the conditions, limitations and ethical guidelines that govern data sharing, which can impose some measure of control. Highly explicit data sharing agreements can also establish a shared set of expectations and surface previously unforeseen risks; they can also act to reinforce awareness about responsible data processes throughout the entire project cycle.<sup>197</sup> Each party may receive confidential information about the other and shall not disclose any confidential information about them to any person or make use of such confidential information for their own purposes at any time. Each party shall also be liable for the breach of these obligations by its current or former employees, partners, subcontractors, etc.

**Tool 22 – Data Sharing Agreement** is a data sharing template example for country offices to consider when working as part of a consortium.

Data collected through CFMs will need to be shared internally at least monthly for transparency, learning and adaptive management purposes with relevant colleagues and/or partners utilising DRC's CFM. This is important to provide project managers, programme teams and senior management with updates as to the types of feedback received, programme gaps and community needs. Access to information highlighted within internal CFM reports should only be disseminated to a select few individual staff on a need-to-know basis. Senior management can be included to provide some level of accountability to programme teams to ensure that feedback is continuously integrated into the response and acted upon.

<sup>194</sup> Protection Information Management (PIM) Initiative, *Framework for Data Sharing in Practice*, (PIM 2015), retrieved from here, p2 (accessed December 2021)

<sup>195</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p51

<sup>196</sup> Ibid.

<sup>197</sup> Creative Commons Attribution-ShareAlike et al, *Ways to practise responsible development data*, (Creative Commons Attribution-ShareAlike 2014), p114, retrievable via this link (accessed December 2021)



### Partnerships

Local and national ownership and capacities are critical within any humanitarian intervention to ensure relevancy and sustainable solutions. DRC can play a role in developing a partnership approach that reinforces and supports local capacities and opportunities encouraging humanitarian principles and values to always be at the fore of response efforts.<sup>198</sup> Examples of partnerships with other actors may include the following organisations:

- Local NGOs
- Local authorities/government
- Formal institutions, such as public educational institutions
- Not-for-profit private institutions, such as private research institutes
- Registered community-based organisations
- Local and international NGOs
- UN organisations.

In order to uphold confidentiality and protection of People of Concern as much as possible when working with other agencies, the following approach, as outlined below, is encouraged.

### Partners and Community Feedback Mechanisms

Partners should use their own CFM system, where it is in place, as they are the closest to the people we aim to serve. This will assist in faster response times because existing internal pathways and available knowledge about project objectives and/or bottlenecks will enable information to flow more efficiently back to complainants. DRC must play a role in ensuring that partners are aware of this CFM guidance and key principles. If an assessment indicates a partner does not have a CFM system in place, DRC can provide technical support, capacity building, resources and tools as required (e.g., training on CFM mechanisms, CoC and PSEAH).

Some partners may choose not to have a CFM for a variety of reasons, chief of which is the underfunding of NGOs/CBOs.<sup>199</sup> Smaller organisations may not feel they have the staff or resources to adequately oversee a CFM system, which is in and of itself an entire project requiring dedicated resourcing. Where they do not have a CFM in place, they can use DRC's CFM, in which case they must also develop corresponding FAQs and assign project focal points so that feedback can be adequately followed up and timely information provided back to affected people. DRC CFM staff will need to liaise

with partners on a regular basis to ensure that non-sensitive feedback is adequately addressed. Where sensitive feedback is received, the partner has an obligation to report this to DRC through the CoCRM or management (CDs).

### Partners and the Code of Conduct

Before DRC commits to working with a partner, the partner assessment phase and dialogue with the partner will need to determine if the partner has a functional CoC and complaints mechanism. If not, it must be determined whether they can develop one (with support from DRC) or if they prefer to abide by DRC's CoC. This must be arranged to DRC's and the partner's satisfaction before signing and executing a sub-grant agreement (SGA).

**Tool 23 – Partner Assessment Tool** can be used to assess partners' quality and level of accountability to affected populations.

Where DRC creates a SGA involving the transfer of funds from DRC to an external organisation or institution for purposes of implementing a set of activities under DRC's programme and budget, there a number of options for these organisations to comply with principles of confidentiality and DRC's Code of Conduct.

Such partners have the option to:

- Use their own Code of Conduct and complaints system** where it is substantially equivalent to the principles listed in DRC's Code of Conduct, meaning that the partner has a code that regulates employees behaviour reflecting the same commitments as DRC. The sub-grantee agrees to inform DRC about any suspicion or information it receives from any source alleging misconduct directly to the DRC CoCRM.

In regard to investigations under the sub-grantee's Code of Conduct:

- The sub-grantee shall receive and process complaints under its internal procedures.
- Wherever the sub-grantee conducts investigations into allegations of a breach of the CoC it will inform DRC at the conclusion and DRC will have the right to request the closure report.
- DRC may directly receive complaints related to staff or management of the sub-grantee.

- Adopt and comply with DRC's Code of Conduct** and DRC's Code of Conduct Reporting Mechanism. The sub-grantee agrees to ensure that all employees sign and are properly trained on DRC's CoC and CoCRM; and as they adopt this as their official mechanism DRC will have the mandate to investigate any suspected misconduct.

**Tool 24 – Global Sub-grant Agreement** provides an example partner agreement template and further details in relation to the CoCRM when working with partners.

### Step 4.4 Pros and cons of participating in inter-agency mechanisms

The possibility of working with other agencies on feedback or complaint mechanisms in specific locations, consortia or sectors should also be considered as having one main system will be less confusing for communities and staff.<sup>200</sup> In some contexts, depending on the donor and project, this may in fact be mandatory by the donor. Given the varying and dissimilar policies and procedures of agencies operating in any one response site, as well as data protection and confidentiality principles that might impede cross-institutional information sharing, implementing inter-agency feedback and complaint handling mechanisms can be understandably fraught with

<sup>198</sup> Danish Refugee Council, *Policy Statement on Partnerships*, (DRC 2019), p3

<sup>199</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p15

<sup>200</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p21

## EXAMPLE FROM THE FIELD

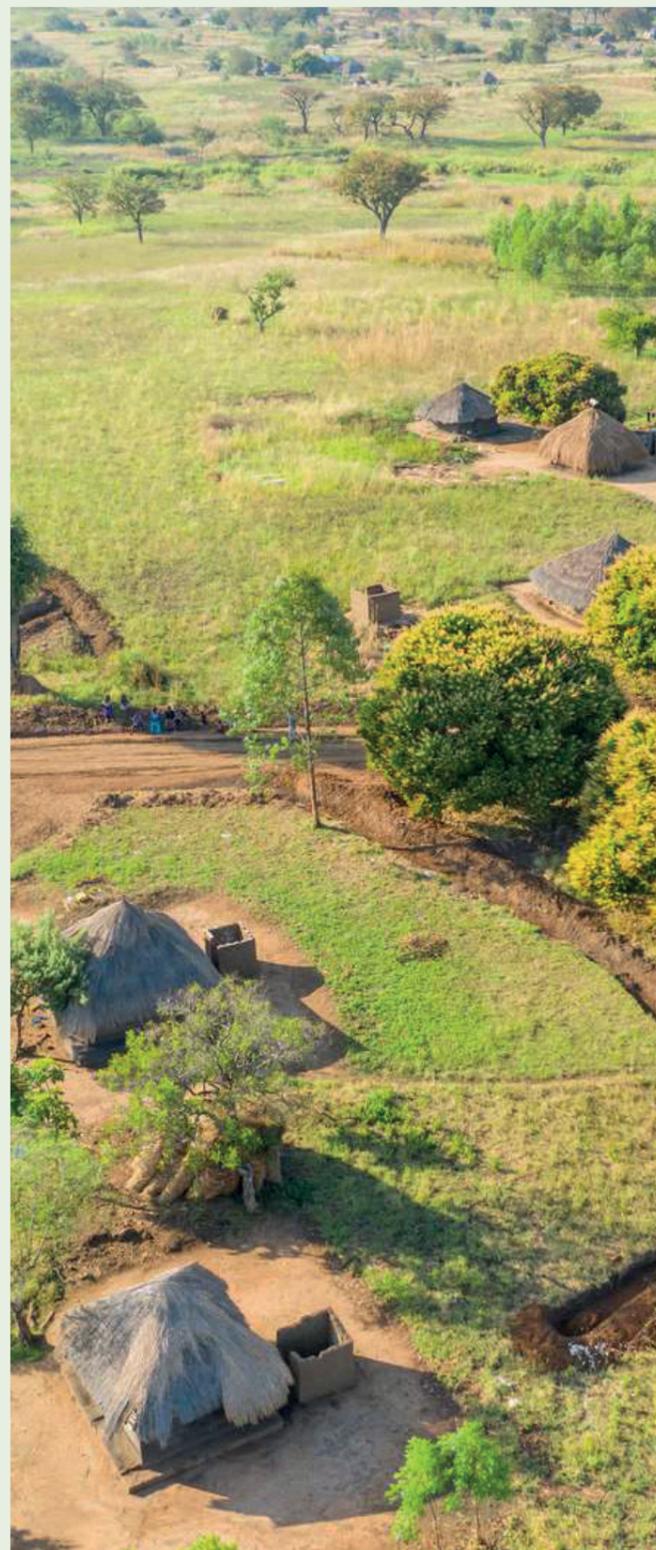
difficulties and must be carefully considered.<sup>201</sup> However, inter-agency CFM systems also assist in avoiding parallel mechanisms and offer effective use of staff time and engagement (where jointly and deliberately resourced). Other potential benefits include:<sup>202</sup>

- **Strengthening of our collective accountability:** through less duplicative modalities, e.g., by having one primary phone hotline rather than multiple, and one cohesive inbuilt referral system to guarantee that feedback will promptly get to the responsible agency via the appropriate pathway.
- **Cost-effectiveness:** the CFM will have combined resources and staffing of other agencies and therefore dedicated teams to set up and manage the agreed-upon community feedback mechanism infrastructure as outlined in agreed SOPs.
- **Improved ability of PoC to submit feedback:** due to eliminating the need for complainants to determine which agency the subject of their complaint works for, as quite often communities do not distinguish between the names and logos of aid organisations.

**«Important» DRC country offices should only take part in inter-agency mechanisms if procedures can be aligned with the principles and approach outlined in this guidance.** It must be explicit in all SOPs and agreements that when there is any alleged misconduct of DRC staff, this must be immediately and directly forwarded to DRC's CoCRM. There should be no follow-up of such cases by inter-agency staff and their role is only to ensure the fast-tracking of the complaint to DRC's global misconduct reporting platform.

201 Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p.xvi

202 Ibid., p30



### DRC Uganda: take care and caution in inter-agency collaborations

Uganda is a country hosting one of the highest numbers of displaced people in the world.<sup>203</sup> It is a relatively stable nation surrounded by a number of countries with histories of civil disturbance, war and violence.<sup>204</sup> With such a high number of refugees living in what is still a relatively poor country, an extensive joint needs assessment was necessary to understand the complex and changing dynamics of displaced communities.<sup>205</sup> The joint needs assessment coincided with and informed the design of an inter-agency phone helpline. The helpline served as DRC's major feedback mechanism and was led by the United Nations High Commissioner for Refugees (UNHCR). The assessment and helpline engaged numerous humanitarian actors, which provided the necessary resources for the ongoing management of a joint CFM system.

The inter-agency helpline was set up to overcome scattered siloes in feedback mechanisms in common areas of operation. It aimed to provide a more coordinated and effective response to refugees' needs by establishing an enhanced, robust and comprehensive inter-agency Feedback Referrals and Resolution Mechanism (FRRM).<sup>206</sup> The approach is a strong example of multiple humanitarian actors successfully cooperating to improve their reach and responsiveness within communities. It also highlights how pooled resources can strengthen the quality of assessments and community consultation.

Another strength of the inter-agency helpline was the policy documentation, feedback categorisation and handling procedures. A lot of effort went into developing clear, accessible and detailed CFM SOPs and referral pathways and protocols. There are scripts for the helpline workers outlining how and where different feedback should be directed. Further, training is something that is stressed and highlighted numerous times throughout the inter-agency SOPs. Training is critical for all staff to be able to successfully manage any CFM system.

The inter-agency helpline started as a six-month pilot and despite the hotline being popular, one of the main challenges during the roll-out was not being able to respond to the high number of calls received. This was due to the limited capacity of some partners and human resources at their disposal to adequately and promptly follow up incoming feedback referred to them. The helpline was also not available to everyone equally. In some locations there was limited to no network coverage and people without access to phones were further excluded. DRC learned that there was too much emphasis placed on implementing one blanket modality of the phone hotline and there was a need to plan for different feedback channels to cater to the varying needs of each community.

Additionally, many calls received were unrelated to the mechanism's overall purpose and there was expressed dissatisfaction with the service (and thus a potential loss of trust in the mechanism) when people were advised that they could not be assisted. There was also a lesson here in improving the messaging and community sensitisation to better explain the scope of the helpline to manage community expectations. Considering the multiple agency buy-in for this endeavour, the resourcing for community sensitisation should have been more easily achieved.

Inter-agency CFMs present opportunities to streamline processes, procedures and resources resulting in more simplicity by not promoting separate, and potentially duplicative, concurrent mechanisms. This will mean that affected people will be less confused about where to lodge feedback. At the same time, care and caution is needed to manage any potential differences in available resources of agencies to manage incoming feedback. Entry-points should also be expanded to include more proactive approaches to account for people who may be at risk of being excluded across different contexts.

203 REACH, *Joint multi-sector needs assessment: Identifying humanitarian needs among refugee and host community populations in Uganda*, (UNHCR 2018), p3

204 Ibid.

205 Ibid.

206 UNHCR, *Uganda Comprehensive Refugee Response: Refugee feedback, resolution and referral mechanism: Inter-agency helpline SOPs - version 1.4*, (UNHCR 2018), p4



## Step 5 Be ready to roll out: communication is key to successful implementation

### Raise awareness: community and staff sensitisation

#### Core Humanitarian Standard Key Action 4.1:

**Provide information to communities and people affected by crisis about the organisation, the principles it adheres to, how it expects its staff to behave, the programmes it is implementing and what they intend to deliver.**

#### Core Humanitarian Standard Key Action 4.2:

**Communicate in languages, formats and media that are easily understood, respectful and culturally appropriate for different members of the community, especially vulnerable and marginalised groups.**

#### Core Humanitarian Standard Key Action 5.2:

**Welcome and accept complaints and communicate how the mechanism can be accessed and the scope of issues it can address.**

After country offices have been through the steps already outlined, there will be a documented understanding of community needs, preferences and mitigation measures to be able to overcome any identified contextual constraints. Modalities should be chosen based on the most contextually appropriate design for each project location, activity and target population. Additionally, clear procedures, staffing and systems outlining the feedback loops to adequately address feedback will be in place – together with corresponding secure and confidential information management systems and processes to record, store and manage incoming data. Once the nuts and bolts of the CFM procedures and infrastructure are finalised and efforts have been made to ensure the entire CFM mechanism is relevant and appropriate for the context, DRC can 'roll out'. This entails beginning to promote the CFM so that all staff and communities know how the mechanism operates and how to access it to safely and effectively raise feedback.

This section outlines the key steps to ensure effective community and staff sensitisation about the CFM. Raising awareness about the CFM is critical for DRC to be able to inform the affected population about what they can expect from DRC and its partners in terms of services, staff attitudes and behaviour; and how to contact us if they wish to offer feedback, especially if we have failed to meet stated commitments or standards.<sup>207</sup>

Communicating with Communities (CwC) is a cross-cutting component of DRC programming based on access to information being a human right and the principle that information is a critical form of assistance, without which affected communities cannot access services, make informed decisions, hold organisations to account and protect themselves. CwC is an essential element in ensuring accountability and transparency, which requires the effective exchange of information between affected people and responders.

### Step 5.1 Staff training and induction

Staff members will need training to understand the rationale behind the feedback mechanism and the procedures for operating it. Competent staff are an essential component to managing an effective CFM system, and training sessions should be provided to all staff on a regular basis. Where CFM policies, procedures and workflows are in place, if staff are not adequately trained on different parts of the mechanism and do not understand all relevant terminology and processes, the system will be ineffectual and may cause harm. An effective CFM relies on investing in appropriate training from the beginning of the design and implementation.<sup>208</sup> It is integral for any system that key staff who are involved in the running of the mechanism, at all levels, are well trained and their duties are clearly identified

in system documents so that everyone knows who to go to at each stage of the feedback process.

Specialised training for identified project CFM focal points who have a specific role in the feedback loop and any identified CFM community mobilisers responsible for promoting the mechanism and facilitating feedback sessions will also require additional and separate training according to their specific role and required competencies.

**«Important» Training about CFM procedures is also important for staff who are 'outside' the system. All staff who deal with affected populations are likely to receive some form of feedback and they must know what to do with this information and communicate it to the right people or department through the correct channels.**

Training should only take place once the country office has clear processes and procedures in place outlining the corresponding CFM policy, structure, systems and staffing. Training should form part of the country office's mandatory onboarding procedures for all new employees. Regular refresher courses need to be made available and compulsory at appropriate intervals (at least annually).<sup>209</sup> Resources to encourage ongoing learning about the CHS, PSEAH or AAP should be offered to encourage continuous self-learning via e-Learning, online networks or discussion forums. The content of the CFM training for all staff should cover at least some of the following:

<sup>207</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p20

<sup>208</sup> Ammerschuber & Schenk, *Complaint Mechanisms for Non-Governmental Organisations: A practitioner's guide*, (The Community of Cooperation of Bread for all & its partner organizations 2017), p4

<sup>209</sup> Ibid., p41

- Brief overview of the CHS (especially relevant Commitments, e.g., 4 and 5)
- Purpose, scope, structure and rationale for the CFM system
- Review of terminology: feedback versus complaints, and referrals
- Overview of feedback categories
- Distinction between non-sensitive and sensitive feedback and corresponding feedback loops
- Linkages between the CFM and the CoCRM
- How to adequately respond to SEAH and any sensitive disclosures
- Role of CFM project focal points (within programme teams) versus CFM/Accountability or MEAL staff who manage the CFM system
- Country office CFM modalities, IEC materials and community sensitisation plans
- Importance of CFM mainstreaming.

**Tool 25 – CFM Staff Training Tool and Tracker Template** is a basic example of a CFM all-staff training presentation and training plan template.

Staff must also be made aware of their expected behaviour as per DRC's Code of Conduct, which reflects the values and commitments of the organisation as well as basic humanitarian principles. DRC's Code of Conduct focal point is responsible for organising such training for all new staff and for organising refresher sessions. These can be done in partnership with the HR teams in-country.

«**Important**» Training about the CFM system should be separate and in addition to the training for staff about the CoC, however, they are linked. The CoCRM must always be referenced within CFM presentations in terms of staff's obligation to always report any suspicion of misconduct directly there.

#### Key tips for approaching staff sensitisation about the CFM

- Develop an all-staff CFM training plan, for DRC staff and representatives at all levels, from senior management through to drivers, cleaners and incentive workers. Adapt the material using a variety of formats according to the audience: and always include how staff can safely, appropriately and confidentially manage sensitive feedback, including SEAH. Translate all materials and key messages into relevant languages.
- Staff training about the CFM should take place on a regular basis to ensure staff are aware of any changes to processes or procedures within the mechanism. Training attendance should also be tracked, with alert notifications set for when staff require refresher training.
- Encourage staff to always share informal feedback when received outside formal feedback reporting channels. Encourage project managers and CFM focal points to mainstream the CFM into all activities in partnership with dedicated MEAL/accountability staff and jointly decide on contextually appropriate modalities, key messages and IEC materials.
- Work with HR and Protection teams to ensure that all staff separately receive CoC, safeguarding/PSEAH and general protection training for staff to be able to identify sensitive feedback and deal with this in a consistent, safe and confidential manner.



- Ensure that dedicated CFM teams receive additional training, for example in psychological first aid, IMS software, or other identified needed training. Ensure CFM staff are briefed by all chosen project focal points so that they have an overview of all project activities, and the corresponding challenges of each individual team.
- Internally communicate the existence of the CFM, clearly outlining its purpose and its functioning through regular staff meetings, training or inductions, website, social media, posters, flyers or appraisal meetings to continuously raise awareness.<sup>210</sup>
- Incorporate activities into your training sessions with staff to familiarise them with feedback categories and how to respond. Draw on existing case examples of the types of feedback CFM staff have received and ask staff to discuss which category they are and how it should be resolved. See **Tool 26** as an example.

**Tool 26 – Feedback Categories Activity** is a training tool offering different examples of feedback received via CFMs for staff to reflect on the category and how to resolve it.

<sup>210</sup> Ammerschuber & Schenk, *Complaint Mechanisms for Non-Governmental Organisations: A practitioner's guide*, (The Community of Cooperation of Bread for all & its partner organizations 2017), p40

### Step 5.2 Community awareness raising

Effective communication with communities is vital to creating an efficient feedback system. The CFM should be promoted to a range of relevant stakeholders and especially PoC directly taking part in DRC's interventions. As highlighted in **Step 1**, DRC should seek permission and ensure that local authorities, camp management or other relevant humanitarian actors are informed about the CFM. This will assist in increasing the acceptance of the mechanism, avoid potential resistance, pushback and duplication, and minimise the overall risk of doing harm.

Information about the CFM system should be easily visible, accessible and frequently communicated.

The promotion and awareness raising of the CFM system with communities across DRC offices is crucial to ensuring that they are aware of its existence. It will likely be underutilised and thus ineffective if community awareness efforts are not adequately addressed. All DRC field offices must prioritise and boost their sensitisation activities about the CFM, which is also a core part of our broader accountability to affected populations, namely that:



#### Communication with communities

- People have the right to timely, accurate, and relevant information about:
  - Their rights and entitlements
  - DRC and its programmes, commitments and expected behaviour of staff.
- Communities must be made aware of safe and reliable avenues to raise feedback; and for concerns to be responded to in a timely and transparent manner, where stated promises or commitments are not met, especially in relation to SEAH, to protect and safeguard those we seek to serve.
- Communities should know about the implications and changes to DRC's ongoing programming and CFM mechanism, including opportunities to participate.

#### Development of key messages for information dissemination

Whilst communication is one of the most important aspects of creating an efficient CFM, it is also one of the most underestimated and neglected parts. It is not merely about setting up the structure, policy and procedures but crucially, it is also about communicating its existence.<sup>211</sup> Communication works when we make a concerted effort to do it well and quite often it is assumed that it has already taken place.

Without consideration and a dedicated approach to promote the CFM, its purpose and scope to relevant stakeholders, it will not be used effectively. Communication with communities should be ongoing, and not just as a one-off throughout the project cycle, to elicit the most recent feedback in relation to ongoing activities. Information provision should be prioritised and carefully planned and structured. **When promoting a CFM system, DRC must communicate the content as outlined in the following table:**

Overview of key content to include when preparing messages for CFM awareness raising	
<b>Basic introduction</b>	Information about DRC (and/or its partners), who we are, activities we are conducting and their purpose, as well as the behaviour affected communities can expect from our staff and representatives.
<b>Purpose and rationale of the CFM system</b>	What a feedback mechanism is and why it is important.
<b>Scope: who it serves and the types of feedback</b>	The CFM scope, clearly outlines who can utilise the mechanism and the coverage of issues it covers (and cannot) with local examples.
<b>Feedback channels and information dissemination methods</b>	Where and how the CFM can be accessed, the frequency, times and availability of feedback modalities (e.g., when people can access phone hotlines, help desks, etc); and how it will be promoted throughout the community.
<b>The feedback loop systems and processes</b>	How feedback raised will be managed, followed up and within which feasible time frames.
<b>Data protection and security of information</b>	Informed consent, data storage and protection measures, confidentiality assurances and the right to raise anonymous complaints.

Clear and frequent communication with communities about the CFM will limit the number of misunderstandings and build trust with affected people. Information provision and transparency about DRC's intentions, processes and opportunities to input should be a priority from the start, even before the feedback mechanism is rolled out. **Below are some further considerations for when you raise awareness of the CFM with communities:**

- **Emphasise data protection and confidentiality measures:** It is important that staff share how DRC is committed to keeping people and their information safe during the feedback process. Information may

need to be shared internally with project teams to ensure issues can be promptly followed up so we can improve our work. Where sensitive information is received, this will only be shared with people who need to know, which may include DRC's HQ if gross breaches of misconduct are reported. People using the CFM system must be aware of where and how their personal details and feedback will be recorded.

- **The principle of non-retaliation:** People of Concern must be assured that they can provide feedback confidentially and without fear of retaliation, meaning there will be no negative consequences for them, or their communities, if they want to provide

<sup>211</sup> Ammerschuber & Schenk, *Complaint Mechanisms for Non-Governmental Organisations: A practitioner's guide*, (The Community of Cooperation of Bread for all & its partner organizations 2017), p40



negative feedback about DRC's performance, e.g., they will not stop receiving assistance if they offer feedback or complain. Feedback handling processes and procedures must be transparently shared so communities can be assured that the overarching purpose of the CFM is for DRC to improve.<sup>212</sup>

- **Provide concrete examples of the CFM scope:** DRC must manage expectations and clearly explain what the CFM system is for and what it is not for, so that communities do not get the false impression that a CFM can solve all of their problems. Offer concrete examples of what it can be used for (current areas of concern that DRC can handle) and examples of what we cannot do. For example, we can aim to improve the quality of items provided and the selection criteria processes; however, it may be difficult for DRC to directly address feedback about local authorities or other humanitarian actors.

- **Public messaging about the CFM should announce that services provided are free:** Staff must communicate that the provision of aid is free, and no one is expected to give anything in return. DRC staff must never ask for or accept money, goods, services, sexual or other favours in return for humanitarian assistance.
- **Be clear on the fact that it is not possible for DRC to meet all requests:** There may be frustration and disappointment if changes expected are outside the control of DRC, and so repeated, continuous and frequent communication about the CFM purpose, scope and modalities is critical.<sup>213</sup> The main purpose of the CFM is to receive ideas, suggestions, concerns or opinions about us – DRC – and the activities and services we deliver, so that we can make them better.
- **Anonymous feedback is welcome:** Explaining that feedback can be provided anonymously is important. DRC must also highlight the limitations of this, including our inability to respond directly back to that individual.

212 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p20  
213 Ibid.

«**Important**» DRC must communicate that whilst anonymous feedback is welcome, it will be difficult for DRC to directly follow up with the reporting person to close the loop. However, DRC assures that regardless of the anonymity of the feedback, it takes all matters seriously, and will do its best to target actions and responses as required.

- **Managing feedback from DRC staff:** DRC staff themselves may also choose to raise feedback about their own programmes anonymously, especially if they feel uncomfortable doing so with their line manager. If a staff member has shared their personal information, it will be important to speak to them first to see what specific details they would be comfortable to have referred to the relevant team or project manager in order to protect them from any potential reprisals from senior staff.
- **The messaging and information shared with communities should be concise and in simple and plain language of the local language of the target audience:** This will help decrease the risk of misunderstandings. Where languages are not written, oral communication methods must be prioritised in line with community needs and preferences. Examples of content to include and prepared scripts for DRC staff to promote the CFM can be found in **Tool 27**.
- **Staff should frequently update the content of core CFM messages:** These should always be in line with changes made to the broader CFM policy and framework. This is vital to ensuring that materials and messaging remain up to date.

214 Danish Refugee Council, *Age, Gender and Diversity Mainstreaming Policy*, (DRC 2020), p2

215 CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p16

**Tool 27 – Script for DRC staff to promote the CFM** offers an overview of structured content for DRC staff to simply and succinctly promote all elements of a CFM system with communities.

#### **Adapt your communication channels and approach**

It is important for DRC to communicate key messages about the CFM effectively and clearly in a variety of contextually appropriate and accessible formats across age, gender and diversity factors.<sup>214</sup> This will help ensure that all community members, especially those who face additional risks, can be supported and prioritised during community sensitisation activities. Communication methods need to be adapted to the local context and DRC must target different groups separately, for example by ensuring simple and clear methods of conveying information to children. This will ensure messaging is inclusive of and does not limit people's participation or ability to receive information.

«**Important**» Each country operation will need to find out the best way to communicate with the required stakeholders within a community – namely, the most preferred, safest and most appropriate communication channels, language and format. Different groups (e.g., mothers with young children, older men or women, people with a disability, etc) will have different communication needs and trusted sources of communication, which DRC must consider for successful roll-out efforts. This information can easily be obtained by reviewing findings of the Information Needs Assessment.<sup>215</sup>

Messages will need to be disseminated carefully and creatively to prioritise the diversity of needs in any one community. In some contexts, languages will have no formal written form and literacy levels may be extremely low. In these cases, posters and other printed written materials should not be used as stand-alone tools. Oral communication may be the most trusted and common information source and visual pictorial aids can be used to reinforce key verbal messages. DRC encourages staff to communicate through multiple channels, and to repeat core messages.

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**Examples of communication channels include:**

- Mobile walk-through campaigns via community mobilisers
  - Audio or voice recordings
  - Video clips
  - Displaying large posters and IEC materials in service locations, DRC-supported facilities such as community centres, common community spaces, or noticeboards (including cartoons or other pictorial visual aids)
  - Distribution of IEC materials, e.g., pamphlets to households
  - Mass SMS, Viber or WhatsApp campaigns
  - Direct phone calls
  - Local newspaper or radio messaging
  - Drama or songs (music) or other creative outlets
  - Social media messaging
  - Door-to-door household visits
  - Community sensitisation sessions via public meetings or other events
  - Hosting of separate community meetings targeting representatives from at-risk and/or marginalised groups, e.g., ethnic or linguistic minorities, or people with a disability etc.
- 

**Importance of coordinating key messages**

Where DRC is active in CwC Working Groups and/or inter-agency feedback mechanisms, where there are multiple actors present in our areas of operation, staff should attempt to organise and harmonise joint awareness raising activities and messages (where relevant) to avoid duplication. Ideally, this would be led and supported by relevant local or inter-agency actors. Any potential conflicting messages risks creating uncertainty and mistrust and may also do harm.

**Information Education and Communication materials**

Regular information and communication is essential for affected populations to be able to access services, make informed decisions and hold aid agencies to account. DRC staff and representatives are responsible for timely and accurate information dissemination to communities about the CFM prior to, and during, any programme implementation. The team responsible for the management of the CFM system will take a lead role in planning the information dissemination about the CFM. Trained designated project CFM focal points also need to lead the promotion of the CFM in their ongoing sector activities. This task may be delegated to community mobilisers or incentive workers, in which case, they must have received all of the appropriate training first on feedback loops, procedures and corresponding scripts before commencing any community sensitisation activities. DRC may select a pool of community mobilisers from within existing groups and community structures, e.g., youth groups, organisations supporting people with a disability, and various committees.

The CFM will not work if the targeted community is not adequately made aware of the CFM. DRC must ensure that information is readily available on where and how to provide feedback with efforts made to support more at-risk or marginalised community members to understand and access it. DRC can also engage with communities on the design of CFM IEC awareness raising campaign materials; this is especially important to increase accessibility for all community members. Once developed, DRC can consult and pilot these materials within the broader community for further feedback and modifications before rolling out more widely.

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CFM information dissemination materials accompanying DRC projects should be created in the planning and design phase of the project cycle. **Ideas for IEC materials might include:**

- Information boards
  - Project posters
  - Banners
  - Leaflets or flyers
  - Stickers
  - Scripts with verbal messaging
  - Business cards
  - Printing on goods delivered to communities
  - Printing on existing project-related IEC materials
  - Voice and video recordings
  - Focus group or structured discussions
  - Verbal messaging for community campaigns, events or ongoing project activities.
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**Tool 28 – Accountability Awareness Raising Posters**

offers a standardised series of Code of Conduct awareness raising material pertaining to sexual exploitation, abuse and harassment, fraud and corruption, and equality in the workplace. The posters are available in multiple languages and offer a number of images for staff to choose from to ensure they are accessible and culturally acceptable for a range of contexts.



### Step 5.3 Community sensitisation plans

To start the official roll-out of the CFM and plan the promotion of the feedback channels relevant for each location and target audience, it is important to develop a community sensitisation plan to organise and oversee awareness raising activities. This will ensure that everyone has the opportunity to provide feedback in the communities where DRC operates as per the local preferences and needs as they vary across locations and groups. The plan should include at least some of the following in a detailed matrix:

- **Sector**
- **Project**
- **Planned project activity**
- **Date**
- **Field office**
- **Location**
- **Type of site** (camp/ village)
- **Modalities** (feedback channels to be promoted, e.g., main package of phone hotline, SMS, email, help desk or FGD)
- **Target group** (who the session will reach)
- **Promotion method** (how to promote, e.g., IEC materials, or verbal messaging via community meetings)
- **Status of service mapping or other actors present**
- **Nominated project CFM focal point**
- **Responsibility** (persons responsible for CFM promotion)
- **Outcome** (remarks on what was completed or improvements to be made)
- **Timeline** (overview of upcoming monthly project activities where CFM promotion is required).

**Tool 29 – CFM community sensitisation plan** provides an example of a community awareness raising plan to inform communities about the CFM highlighting who to reach, where, when and how.

The development of a roll-out or community sensitisation plan will help to target which projects, localities and groups should know about the feedback mechanism. Each target group within a community may require different ways of being informed and not all of DRC's chosen modalities will be relevant for them. The roll-out plan assists in organising the way forward for CFM implementation and mitigates the risk of excluding specific groups, whilst also assigning the staffing responsible for disseminating the information. It will also help DRC CFM teams to coordinate better with sector teams delivering ongoing project activities, by mapping out where and when awareness activities will take place; for example, during registrations or distributions, case management sessions, community meetings or other recreational activities provided by DRC.

It is important to start small and trial rolling out in a small area in the initial stages to pilot and improve community engagement and CFM modalities along the way. The system may also be overrun with large volumes of feedback if we promote it too widely too soon.

### Step 5.4 Mainstreaming of the CFM system

Once the CFM has been piloted in a number of areas and needed adjustments made to the broader CFM policy and procedures, work can commence on mainstreaming it into every aspect of DRC's humanitarian assistance programming. Integrating the CFM is the practice of bringing accountability into the 'mainstream' or norm of DRC's organisational culture, operations, policies and way of working. **The CFM should be incorporated into the management and programmatic systems of their entire organisation and some examples include:**<sup>216</sup>

- Programme staff and project managers design and implement new programmes to include CFM systems and ensure that project proposals demonstrate how they will be implemented in a context-specific way across each technical sector.
- Country offices plan for and identify resources they can provide to promote CFM efforts at the field level, and Country Directors and all managers support an environment where feedback is prioritised and welcome.
- CFM monthly reports are discussed as a standing agenda item at SMT meetings. SMT members ensure that project managers use the data and analyses of the CFM system and convert the learning into action.
- AAP and/or the CHS is broadly included in job descriptions and job evaluation criteria, particularly for project managers.
- Messages about the CFM are shared at the start of every activity with communities – for example, during a registration or distribution, evaluation, community meeting or before a training session.

- The CFM forms part of existing monitoring tools – for example, asking enumerators to explain what the CFM is and offering business cards for them to use; and/ or incorporating satisfaction, awareness and access questions about the CFM system within all surveys.
- CFM policies and activities are included in regular field audits and staff inductions.

One common risk with mainstreaming is that activities and responsibilities are not based in any one department – e.g., if one person or team is not specifically designated to focus on the CFM, it will most likely not be implemented successfully or consistently. This is why having a dedicated CFM/Accountability team and CFM project focal points across sector teams is key, and why these positions must be sufficiently senior, to ensure that policies are up to date, that mechanisms are functioning, and that all staff know their CFM responsibilities.

At the same time, the onus for using feedback should not lie solely with CFM/Accountability staff, it is a collective endeavour and should include everyone, especially staff in positions of leadership who manage resources and oversee programmatic adjustments.<sup>217</sup> The next section of this guidance is focused on how to monitor, learn and act on incoming feedback.

<sup>216</sup> Inter-agency Standing Committee et al, *Best Practice Guide Inter-Agency Community-Based Complaint Mechanisms (PSEA)*, (IASC 2016), p50

<sup>217</sup> Van Praag, N., *Ground Truth Solutions, 'Accountability to affected people is not a solo act'*, (GTS 2020), retrieved from this link (accessed December 2021)

## PHASE 3 MONITORING, EVALUATION AND LEARNING FROM FEEDBACK

### Step 6 Act on knowledge and learning: understand and utilise your feedback

#### *Monitor and evaluate: continuous learning and adaptation*

After you have adequately trained relevant staff about the CFM, especially those responsible for its promotion, and completed community awareness raising sessions in line with your roll-out strategy targeting specific areas and groups, it is important to check in with the community to monitor effectiveness and understand where changes may need to be made.

What follows is an overview of how to ensure that the information collected from feedback mechanisms is appropriately monitored, analysed, shared and acted upon. It also outlines how the broader CFM should be routinely evaluated and adjusted to reduce barriers to reporting, build trust and confidence with communities, and ensure systematic improvements over time. As previously highlighted, before rolling out countrywide, it is important to draw on the lessons learned from a pilot scheme or any prior experience of CFM implementation within your country office or context. Learning, innovating and implementing changes on the basis of monitoring and evaluating the CFM are crucial to its success.

#### **Step 6.1 Learn from a phased pilot approach**

DRC country offices are encouraged to start small and implement the CFM using a phased pilot approach. Covering a small area initially is helpful to identify the strengths and weaknesses of the designed system. It allows for a concentrated effort in one area to understand what is feasible and thus allow

room for improvements before countrywide roll-out. This approach will also help you to better understand the uptake of the CFM in the community, the volume of feedback and the time and resources required to adequately respond to be able to extrapolate future human resource needs, although this will vary slightly from location to location.

Staff must be careful not to over-extend themselves in the initial stages. DRC should not promote the CFM in too many locations or projects and then not have the capacity to be able to respond as this will affect our ability to be accountable. Therefore, a phased approach to roll out the CFM across DRC localities and projects is recommended.

#### **Step 6.2 Monitoring, analysis and reporting**

For feedback to have an impact and improve our work, it must be appropriately documented, processed, monitored, analysed, reported on and shared periodically with identified stakeholders, especially managers and leaders within DRC responsible for decision-making. Frequent analysis and collation of results will assist DRC to incorporate the learning from feedback into our ongoing work.

#### ***Linkages to existing M&E processes***

M&E processes aim to measure programme effectiveness and progress against set objectives, activities and indicators. The knowledge generated becomes learning and once verified, can be used as an evidence base to adapt and improve programmes over time. M&E guides project adjustments and informs on the suitability of the assistance provided as well as whether it is reaching the people it is intended for. An organisation compliant with the CHS should be able to demonstrate how data from M&E is used to adapt programmes, policies and strategies to improve performance.<sup>218</sup>



M&E and CFM systems are closely linked and complement each other. Both are important sources of data to inform adaptive programming. CFM systems can also measure programme performance by systematically recording community awareness, priorities and satisfaction levels – and/or through monitoring the success of programme adaptations based on continuous feedback received throughout a project. Feedback mechanisms provide an active M&E function in the background of the delivery of existing services and assistance and therefore add value to any ongoing stand-alone scheduled M&E activities. Feedback mechanisms can also assist M&E and programme staff in understanding why a programme is not achieving its intended results, serve as a source of data triangulation and offer immediate suggestions for ongoing improvement.

Additionally, through existing M&E project monitoring, feedback can also be collected from the community about the effectiveness and impact of the CFM system, which can be used to adapt and strengthen the entry points, accessibility, community acceptance and overall frequency of reporting. Questions to assess the quality of the CFM system and adherence to CFM policies and practices can be easily integrated into ongoing M&E efforts. This will ensure that the CFM is routinely monitored and that information about its performance is readily available so that it can be adjusted, as necessary. However, ongoing M&E processes do not constitute a formal evaluation of the CFM system as a whole and should be conducted separately, at least biannually.

<sup>218</sup> CHS Alliance et al, *CHS Guidance Notes and Indicators*, (CHS Alliance, The Sphere Project, Group URD 2015), p10

### Monitoring methods

**Integrating CFM questions into M&E tools:** DRC can continuously monitor the CFM to assess its success and intentional and unintentional impact. Embedding CFM monitoring efforts into ongoing M&E planning with project and MEAL teams will help you to understand whether the intended objectives of the mechanism have been met. CFM feedback questions can be integrated into all M&E tools such as PDMs or end-line questionnaires. This will help you to gain an understanding of the knowledge and effectiveness of community sensitisation activities, trust and satisfaction levels of the CFM.

**Stand-alone CFM monitoring:** Staff can conduct stand-alone periodic monitoring of the CFM system on a regular basis to better understand the mechanism's quality and effectiveness. This would ideally be conducted by M&E staff outside of the CFM implementation team to ensure independence.

**Sample checking:** Sample checking can also be undertaken to follow up on the satisfaction levels with affected people (for non-sensitive cases) and to ensure that cases have been closed and resolved to the extent feasible. Sometimes, programme teams may communicate that feedback has been addressed and advise CFM staff to close it. This additional step will assure DRC CFM staff that cases are consistently being adequately addressed.

**Accountability observational checklist:** Developing an observational checklist can ensure that CFM procedures are being implemented at the field level. Examples include that IEC materials are in place, information sessions are occurring, and help desks are visible and in safe and secure locations. Such a checklist should be updated if, and when, new feedback channels are introduced, or where processes change. Results can be incorporated into CFM reports and additional field support planned where gaps are identified.

An example monitoring tool for conducting stand-alone monitoring with communities as well as key questions to incorporate into other existing project monitoring surveys can be found in **Tool 30**.

**Tool 30 – CFM monitoring tools** offers a range of CFM monitoring tools to be used throughout ongoing programme implementation either as a stand-alone activity, and/or integrated into existing monitoring exercises of M&E teams. There is a template for a CFM observational checklist as well as one for when working with or through partners.

### Development of feedback indicators

Trust and access to CFM systems can change, so DRC will need to ask questions on a regular basis. Monitoring systems should be reviewed regularly to ensure that only useful information is being collected. In order to understand what to monitor, it is important to develop indicators and corresponding monitoring tools to assess CFM practices. A range of indicators can be incorporated into funding proposals and log frames to measure the CFM effectiveness, which should also incorporate age-, gender- and diversity-sensitive components, examples include:

Indicator category	Example feedback indicators
<b>Community engagement</b>	<ul style="list-style-type: none"> <li>Number of affected people (across age, gender and diversity factors) consulted about the CFM design</li> <li>Number of separate groups and/or local civil society actors consulted about the CFM design, e.g., organisations working with or for children, people with a disability, older persons, LGBTIQ+ identified individuals</li> <li>Number of indicators discussed with communities and based on community perceptions of success</li> <li>Number of CFM sensitisation sessions conducted with people across age, gender and diversity factors</li> <li>Number of CFM steering committees established to support CFM activities and decision-making</li> </ul>
<b>Awareness, information and communication</b>	<ul style="list-style-type: none"> <li>% of affected people reporting that they feel informed about the CFM</li> <li>% of affected people who declare that they know how to raise feedback about the aid they receive</li> <li>% of affected people who declare they are aware of the expected behaviour of DRC staff, especially DRC's commitments to prevent SEAH</li> </ul>
<b>Access and safety</b>	<ul style="list-style-type: none"> <li>Number of separate FGDs organised with affected people across age, gender and diversity factors about the quality of the CFM system</li> <li>% of affected people reporting that they have access to CFM information and feedback channels</li> <li>% of affected people who report feeling safe when they use the CFM</li> <li>% of affected people who feel comfortable reporting cases of abuse, mistreatment, or harassment by humanitarian staff</li> </ul>
<b>Systems</b>	<ul style="list-style-type: none"> <li>Average proportion of budget allocation to resource the implementation of the CFM system</li> <li>Number of DRC staff provided with an induction training on the CFM</li> <li>Number of refresher training conducted on the CFM</li> <li>CFM project focal points trained on their roles and responsibilities</li> </ul>
<b>Volume</b>	<ul style="list-style-type: none"> <li>% of feedback received across different localities on a weekly, fortnightly or monthly basis (disaggregated by age, gender or other diversity characteristics)</li> <li>Number of feedback received on a weekly, fortnightly or monthly basis across different feedback channels</li> <li>% of feedback received by category in total per week, fortnight or month</li> </ul>
<b>Satisfaction</b>	<ul style="list-style-type: none"> <li>% of affected people who think that CFM feedback channels are relevant to their needs</li> <li>% of affected people who report that they are satisfied with their experience when accessing the CFM</li> <li>% of affected people satisfied with the response they received to address their feedback</li> <li>% of CFM users who declare their feedback was addressed in a timely manner</li> <li>% of CFM users who report improvements in their lives</li> </ul>
<b>Responsiveness</b>	<ul style="list-style-type: none"> <li>Number of days average response time per month</li> <li>Number of feedback items resolved per month</li> <li>Number of feedback items still outstanding (to be resolved) per month</li> <li>Number of feedback successfully referred externally (via local referral pathways in a timely manner with the consent of the complainant)</li> <li>% of affected people who believe they will get a response to their feedback</li> <li>% of affected people who think their views will be taken into account by DRC in decisions made about the support they receive</li> </ul>

### Analysing feedback

As outlined in **Step 3**, all incoming feedback should be systematically recorded and categorised into the relevant IMS for documentation, tracking and resolution (except for Category 5 CoC feedback). Once it is processed and responded to by relevant personnel for follow up either within DRC, or externally, feedback is considered closed. Only where CFM staff have the capacity, and/or it was requested by the complainant, DRC CFM or programme staff should inform them about the outcome of their non-sensitive feedback. For sensitive feedback, it is considered closed once it is referred to the relevant support service or agency successfully.

All non-sensitive feedback should be input into a tracker monitored daily with access restricted to dedicated CFM staff responsible for ensuring that it is closed. Over time, this data can be analysed, and staff can utilise the statistics, begin to track trends and review response times. Trends can help to inform decision-making, organisational strategies and improve programme quality. Feedback data should be analysed at least monthly and compiled into a corresponding report. It should be analysed using qualitative and quantitative approaches through the main feedback database as well as incorporating findings from other monitoring exercises. **Examples of common trends to be analysed include:**

- Total feedback received during the reporting period
- Overall status of feedback: proportion resolved, referred, or still pending action
- Age, gender, and diversity disaggregation (as relevant by location and project)
- Feedback received per location (area)
- Breakdown of feedback channels accessed (by location and/or by specific groups)
- Breakdown of the type of feedback categories received (excluding Category 5)
- Breakdown of feedback received per sector

- Breakdown of the type of referral or requests for assistance (e.g., cash, food assistance, medical, protection, shelter, WASH)
- Average response time
- Overview of the amount of feedback received over time (monthly comparison).

Staff can add other types of trends as required by the country office, donor or community suggestions. However, the analysis will influence the reporting and staff should think carefully about what to include so that it is more likely to influence operational staff responsible for programme, strategy or other organisational adjustments.

Feedback data should be recorded in a consistent manner and staff should have a thorough understanding of feedback categories and programme activities. This will assist in improving the quality of the data entered into the CFM system. Staff recording feedback must be adequately trained on how to use the feedback form and tools used to enter data. Feedback forms should align as much as possible to the IMS (or main database or tracker) used to record feedback. Feedback questions received through other monitoring exercises, for example, PDMs, should also be harmonised with questions in the main feedback form and IMS. However, including data from these sources outside official CFM channels is optional and will depend on staff capacity.

If minimal to no feedback is received through a particular modality, this should be analysed further with MEAL and programme teams to better understand why people are not using it. **If a feedback channel is not utilised, it can mean that:**

- Affected communities lack **awareness** about it: suggesting weak or inaccessible IEC materials and community sensitisation – they must be provided in a variety of formats and languages and be continuously promoted.

- People do not **trust** in the CFM or feel comfortable using the modality: the procedures and outcomes are not transparent, DRC has not been responsive or the feedback channels are not appropriate.
- People may face **barriers** in accessing it: hence the need for ongoing dialogue and engagement with communities.

It is also important to consider the types of feedback received, and why, as well as who is predominantly using the mechanism and why. All analysis and trends can be verified with communities where needed and follow-up may be required with specific groups that the mechanism is not reaching. Staff must continue to adapt or redesign, based on need as verified with affected populations.

### Validating feedback

People's ability to access feedback channels will vary according to the context and immediate environment. Despite efforts made by DRC to prevent barriers to reporting, the feedback received could be from a small cross-section of the community (or individuals) and may not be representative of all voices, needs and concerns. Feedback data may present a distorted or incomplete picture and DRC has a responsibility to quality-assure the incoming feedback. The triangulation of analysis findings and trends can take place in a number of ways, for example consideration of:

- Feedback received from different entry points (e.g., comparing feedback received via hotlines with that from help desks)
- Other monitoring and assessment data (e.g., PDM surveys, ongoing M&E activities or real-time reviews)
- External sources and channels (implementing partners, coordination structures or local authorities)
- Information from programme staff or communities (technical teams or community-based groups, etc).

DRC can also facilitate routine validation workshops to verify feedback. Validation workshops provide DRC with an opportunity to publicly close the loop on a regular basis with communities, and to consult with communities in more depth on issues raised and their preferred solutions. At no point should DRC ever share who the individual feedback is from and efforts need to be made to ensure that people will not be identified. **Validation workshops will allow DRC to:**

- Share the types of incoming feedback received with community stakeholders and create a forum for open discussion to clarify and verify key issues of importance
- Demonstrate that we take all feedback received seriously, thus increasing trust and confidence in the mechanism
- Consult and collaborate on finding local solutions to concerns raised through the CFM
- Raise awareness of the CFM, and reinforce the purpose, scope, available entry points, procedures, people's rights and entitlements
- Close the feedback loop, share analyses and actions taken to respond to feedback.

Validation meetings or workshops can take place fortnightly or monthly in line with the CFM reporting schedule. They can be hosted in areas chosen at random and/or deliberately selected by project teams at the same time and place for consistency – for example, in camp settings. Country offices should develop criteria for whom to consult, where and how often, which will likely depend on the human resources available within the CFM team.

**Failing to adequately address and clarify feedback can lead to a loss of legitimacy, loss of trust, anger and even security incidents. DRC must prioritise a participatory approach for ensuring that the community can take responsibility for, and play its part in, solving problems that arise through CFM systems.<sup>219</sup>**

219 ALNAP, *Participation Handbook for Field Workers: Section 1.2. Why 'do' participation*, (ALNAP 2009), retrieved from this link, p201 (accessed December 2021)

### Feedback reporting and sharing of learning

Once the analysis is undertaken, the next stage is for DRC CFM teams to compile a report based on the findings and present these findings in a narrative with charts, graphs or tabular formats. This should be conducted at least monthly to share the identified trends, structural issues or concerns surfacing within communities that need to be addressed. The results presented should therefore be conducted within a consistent time frame with clear, concise and concrete recommendations for decision-makers.

The report should be circulated in time so that issues requiring corrective action can be accommodated within that month and decisive adjustments can be made. Reports offer project managers and leaders a snapshot of overall trends and performance in projects over time. They are shared for transparency, learning and adaptive management purposes and provide insight into community satisfaction levels, appropriateness and effectiveness, with progress documented throughout the project cycle. They can also be used as an accountability tool to see what action has been taken to address concerns raised and to monitor whether changes to project implementation have an impact. They can be prepared for each area individually with more contextual detail or compiled into one main aggregated report with a broader analysis for senior managers.

CFM teams together with the CFM Steering Committee can decide whom to share this report with. It should be at least shared with Project Managers, Heads of Programme, Team Leaders and the SMT. It may also be shared with all team members to promote a collective responsibility to address improvements. The content reported on should not be identifiable to any individual, and all content and recommendations should be constructive without singling out staff members. Whilst Categories 4, 6 and 7 can be reflected numerically, no details of these sensitive categories should be documented. Category 5 complaints should never be recorded

on or reported on through the CFM – as they are processed separately and managed through the global CoCRM.

To build collaboration and buy-in from programme teams, CFM staff can prepare concise feedback summaries and host monthly meetings with them to review the feedback and ideas for course correction. They should acknowledge that sometimes feedback can be hard to hear as it may reveal shortcomings. However, feedback is positive as it is all part of a process to be more responsive, relevant and to improve, and we are all always learning. DRC staff should avoid finger-pointing and placing blame, and instead focus on how to work together and the next steps to improve outcomes for the people we serve. CFM staff should also be open to improvements to make feedback processes more efficient and should also consult with programme teams on how they would like feedback reports to be presented. These preferences should be balanced to help support feedback utilisation.

In the interests of transparency, information from CFMs and the actions taken to address feedback should also be shared with communities and partners (for non-sensitive data only).

**Whilst people are increasingly consulted, they rarely receive updates about the results of the mechanism and how their inputs will be used to inform decision-making.**<sup>220</sup>

This will help improve confidence in the system and encourage people to continue providing feedback because they understand how it is collated and the actions considered or taken to address it. This can take place via monthly CFM meetings where the mechanism is promoted, or feedback validated. **Engagement with communities is critical to close the loop and to demonstrate that DRC not only listens, but actively attempts to rectify concerns raised and utilises community feedback to influence decisions.**

**Tool 31 – CFM Reporting Template** offers a standardised example of a CFM monthly report to be adapted for DRC operations.

### Step 6.3 Adaptive management (learn and act)

All too often, humanitarian actors set out to receive feedback, analyses are conducted and even reports generated, but immediate changes based on the learning generated from CFMs are not always incorporated into the humanitarian response or strategy. Project managers have a particular responsibility to ensure that they utilise learning and adjust programmes to act on incoming feedback. Follow-up of recommendations made to project teams can occur on a regular basis through consistent meetings held with CFM staff and programme teams, or as a set agenda item at SMT meetings.

Where possible, feedback from communities should also be considered during annual review processes and guide the design of new strategies, as well as the broader country Humanitarian Response Plan (HRP). Eliciting feedback is a senseless exercise if DRC does not take action to ensure it is incorporated into existing projects, processes, strategies and decisions.

**All staff need to adopt the mindset that feedback is about improving our projects, work, relationships and lives of the people we work with and for. We must strive to continuously improve instead of waiting until the end of an intervention to find out that we were ineffective or caused harm. We must create a culture where feedback is always welcome and understood as a positive opportunity to constantly learn, adapt and act.**

### Step 6.4 Evaluating the CFM

After the mechanism has been implemented for at least one to three months as part of a pilot, DRC will need to evaluate with the community whether there is a need to change the approach, channels or availability (days and times) of the feedback modalities adopted. Stand-alone evaluations should in any case be carried out regularly (at least biannually) to assess the overall efficiency and effectiveness of the CFM.

DRC is encouraged to involve crisis-affected in ongoing monitoring and evaluation processes of the CFM. People (and partners) can be trained to conduct real-time evaluation exercises that will further enhance transparency and quality and encourage their ownership of the mechanism. Evaluations should cover questions similar to ongoing monitoring and should capture more qualitative information about the impact and sustainability of the CFM and not just satisfaction levels. **Examples of areas to evaluate include:**

- Perceptions about the usefulness of the CFM
- Acceptance levels, sense of safety, trust and confidence in the mechanism
- Appropriateness of feedback modalities
- Accessibility and barriers to reporting (especially for any minority or at-risk groups)
- General awareness about the purpose and scope of the CFM
- How well programmes are promoting the CFM
- Satisfaction levels and perceptions of responsiveness
- Sense of community ownership and people's ability to influence decisions and processes.

**Tool 32 – Evaluation questionnaire** is a stand-alone evaluation tool to measure the overall effectiveness of the CFM.

Information collected through evaluation processes should be conducted, analysed and presented by an independent team, ideally other MEAL or Protection staff, or relevant community members/partners assigned with responsibility for conducting this. It should be in a brief and accessible format that encourages sharing of learning and decision-making on needed adjustments to improve the CFM. Key findings and actions required can be incorporated into existing CFM action plans to ensure that the recommendations from the review are followed up.

<sup>220</sup> ALNAP, *Participation Handbook for Field Workers: Section 1.2. Why 'do' participation*, (ALNAP 2009), retrieved from this link, p41 (accessed December 2021)

## Part 3: Tools summary

The following tools are a combination of materials developed at both the HQ and country office levels. We acknowledge and thank all DRC country offices for sharing their CFM policies, SOPs, IEC materials and resources as part of an internal review. CFM documentation collated across all DRC operations can be accessed via our internal **CFM Repository of Tools**. We encourage colleagues to continuously share resources so this repository can remain current and continue to benefit our hardworking colleagues based directly in the field.

Tool 1 – Script to brief local authorities or other actors  
 Tool 2 – Rapid Assessment Feedback Questionnaire  
 Tool 3 – Information Needs Assessment  
 Tool 4 – Rapid Gender and Intersectionality Analysis  
 Tool 5 – Dice-breaker Child Feedback Game SOP  
 Tool 6 – CFM budget  
 Tool 7 – CFM Implementation Action Plan  
 Tool 8 – CFM Feedback Categories SOP  
 Tool 9 – CFM Policy Framework and Guidelines  
 Tool 10 – CFM Workflow Template  
 Tool 11 – CFM Officer ToR  
 Tool 12 – CFM Project Focal Point ToR  
 Tool 13 – Frequently Asked Questions (FAQ) template  
 Tool 14 – Helpdesk and Hotline SOP  
 Tool 15 – DRC SEAH training  
 Tool 16 – DRC CoC Training Package  
 Tool 17 – Tips for managing disclosures template

Tool 18 – DRC Code of Conduct Standard Donor Reporting Form  
 Tool 19 – Formalised Feedback Form  
 Tool 20 – Everyday Informal Feedback Form  
 Tool 21 – Declaration of Confidentiality and Integrity  
 Tool 22 – Data Sharing Agreement  
 Tool 23 – Partner Assessment Tool  
 Tool 24 – Global Sub-Grant Agreement  
 Tool 25 – CFM Staff Training Tool and Tracker Template  
 Tool 26 – Feedback Categories Activity  
 Tool 27 – Script for DRC staff to promote the CFM  
 Tool 28 – Accountability Awareness Raising Posters  
 Tool 29 – CFM community sensitisation plan  
 Tool 30 – CFM monitoring tools  
 Tool 31 – CFM Reporting Template  
 Tool 32 – Evaluation questionnaire



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DRC advocates for the rights of and solutions for displacement-affected communities, and provides assistance during all stages of displacement: In acute crisis, in exile, when settling and integrating in a new place, or upon return. DRC supports displaced persons in becoming self-reliant and included in host communities. DRC works with civil society and responsible authorities to promote protection of rights and inclusion.

Our 7,500 volunteers in Denmark make an invaluable difference in integration activities throughout the country.

DRC's code of conduct sits at the core of our organizational mission, and DRC aims at the highest ethical and professional standards. DRC has been certified as meeting the highest quality standards according to the Core Humanitarian Standard on Quality and Accountability.

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