



Annex 4

Feedback, Complaints & Whistle Blowing Procedure

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1. Introduction of the procedure

This Feedback, Complaints and Whistle Blowing Procedure constitutes annex 4 of the Help a Child Integrity Policy and is put in place to allow the beneficiaries, partners, staff and other stakeholders of Help a Child to share feedback, concerns and complaints on communications, actions and behavior related to our work, have them heard and properly addressed.

Guiding principles, in line with the Core Humanitarian Standard to which Help a Child adheres:

- Help a Child takes feedback and complaints seriously and perceives it positively. It shall address all issues of (sexual) exploitation, abuse of power, corruption, illegal activities and breach of our policies and standards.
- Help a Child is committed to have an effective procedure for handling and responding to feedback and complaints. Procedures should be understandable and accessible.
- Help a Child strives to protect the complainant, and the suspect. When necessary, adequate support will be made available to them.
- Appropriate cultural and local practices should be respected in the development of complaints mechanisms.
- Both complainants and accused have a right to challenge decisions and to be properly informed about the basis on which decisions have been made. At any point the confidentiality aspect shall be maintained.
- The procedure for complaints will be reviewed regularly to ensure and incorporate learning and improvement towards Help a Child's accountability.

Definitions:

- **Feedback:** information about reactions to a service, a person's performance, etc., which can be something to improve, an advice to repeat an activity, or a tip, etc.
- **Complaint:** is an expression of dissatisfaction or something that is unacceptable. This can be dissatisfaction with program activities, behavior of staff, etc. about which someone raises a complaint.
- **Whistleblowing:** the term used when someone passes on information concerning wrongdoing; "making a disclosure". In this context, whistleblowing means the disclosure by an employee/representative of information related to a breach of code of conduct by another employee/representative.

This policy deals with feedback, and complaints related to the organization's Integrity Policy and raised in response to certain program activities or possible misconduct of any representative of Help a Child (e.g. staff, consultants, volunteers, trainees, interns, and group travel guides and participants). Also, it addresses concerns and complaints about possible misconduct by a partner of Help a Child.



2. Sharing feedback, concerns and complaints

2.1 Conducive environment

Help a Child is committed to protect its beneficiaries and staff from any abuse and to provide an effective procedure for handling and responding to and addressing complaints, and feedback. Also, all people working on behalf of Help a Child its programs should respond positively to any complaints made to them and feel confident to do so. The organization (senior management) should ensure an atmosphere of trust, confidence, and value orientation for this purpose. Guidance and procedures are provided for staff and communities supported by Help a Child, to avoid ad hoc, defensive, negative responses and uncertainty about what is expected of staff in responding to complaints.

All concerns and complaints shared are confidential. All records/reports are kept in a secured folder with limited access. Disclosure of information only can be made to relevant parties on need to know basis.

In each country with a Help a Child Country Office a focal person from among Help a Child country staff is selected: the Integrity Focal Point. This person is responsible for ensuring that:

- staff is aware of and has good knowledge of the Integrity Policy, and the Feedback, Complaints and Whistle Blowing Procedure in particular;
- a context-appropriate response mechanism is put in place, where possible in close collaboration with the staff of the involved partner organizations and the target communities;
- target communities know how to share feedback, concerns and complaints;
- the Feedback, Complaints and Whistle Blowing Procedure is adhered to in the particular country.

Part of this conducive environment is **raising awareness** about the existence of community-based complaints and feedback mechanisms as well as the internal reporting mechanisms. In a Help a Child program country without Help a Child country office agreements should be made with the organization's partners to ensure the staff of these partners are made aware of Help a Child's Feedback, Complaints and Whistle Blowing Procedure; a context-appropriate response mechanism is put in place, where possible in close collaboration with the target communities; target communities know how to share feedback, concerns or complaints; the procedure is adhered to in the country.

Awareness could be raised by distributing posters, flyers, organizing workshops or meetings with communities.

2.2 Confidential counselling and reporting mechanisms

Help a Child assigned an Confidential Counselor to support people experiencing or witnessing misconduct by Help a Child's representatives and/or in our programs.

Conversations between the Confidential Counselor and the person asking for advise are strictly confidential. The support includes: a listening ear; support in the clarification of the



type of misconduct experienced (e.g. moral protest, violation of integrity); advise on possible steps to be taken; support in making a decision related to this.

The Confidential Counselor is not the one to report to. The Counselor can refer to the reporting channels for violations of integrity; HR for employment issues, care referral and coaching; the organizational moral committee to discuss moral protests and doubts. The person asking for advice from the Counselor can still choose not to report the issue.

The leaflet in annex 5 of the Integrity policy contains more information on Help a Child's confidential counselling.

Reporting channels for Help a Child staff and partner staff

Help a Child staff or partner staff can choose from several channels to report their concern or complaint:

The management

- Filling out the below incident reporting form and sending it to their line manager.
- If line manager is involved, or if there is a need to escalate the complaint, contact Integrity Team.

The Integrity Team

- Filling out the below incident reporting form and sending it to the country office Integrity Focal Point.
- Filling out the below incident reporting form and sending it to the Integrity Coordinator (integrity@helpachild.org, or integritycoordinator@redeenkind.nl).
- Calling the Integrity Coordinator (+31(0)38-4680869) or the country Integrity Focal Point.
- Download the reporting form on the Help a Child website; then send it to the Integrity Coordinator.
- Additionally, if needed, and especially in cases of SEA, the Referral Form could be used to refer the complainant or survivor to the appropriate service providers.

Community Based Feedback and Complaints Mechanism (CBCFM)

At the start of every new project the type of reporting mechanisms used by the target community will be agreed upon together with these communities. Examples of possible complaints mechanisms are:

- A concerns & complaints box;
- E-mail;
- Phone;
- In person;
- Through a trusted intermediary.

The CBCFM approach is fully described in a separate document, including a community consultation guide to define which channels are appropriate and preferred.



Channel for anybody who wants to share feedback or a complaint

Both our Dutch and international website mention the organization's address, telephone number and email address and include a feedback and complaint form that can be used by anybody to share feedback, concerns or complaints. This form will be received by the reception, but not by the Integrity Coordinator directly, although it will be forwarded to the relevant staff member(s).

- feedback and Link to the complaint form on the Dutch website:
<https://www.redeekind.nl/contact>
- Link to the feedback and complaint form on the Dutch website:
<https://helpachild.org/contact-us>

Complaints about partner organizations of help a child

When the concern or complaint concerns a partner organization which is implementing a project on behalf of Help a Child, the complaint should in the first instance be addressed to the partner organization. To ensure that these concerns and complaints are dealt with well, having an Integrity Focal Person and a complaint handling mechanism in place is a condition for contracting. Concerns and complaints received by partner organizations always have to be reported to Help a Child who will review and assess whether complaints have been accurately handled.

2.3 Timeframe

Any concern or complaint should be reported as soon as possible, preferable no later than one week from the date when the incident happened, but in cases of breach of Integrity Policy, preferably as soon as possible as it is crucial to follow up immediately. This gives Help a Child the ability to respond adequately and timely and to ensure evidence is not getting lost and the complainant is referred to the available (protection) services.

Complaints received by partner organizations always have to be reported to Help a Child within one week. In case a complaint is raised about (staff of) Help a Child, the country office always has to report the complaint to the Coordinator Integrity within 72 hours after receiving the complaint.



3. Handling feedback, concerns and complaints

This sections describes the procedure to be followed in case a complaint is received. Wherever a “complaint” is mentioned, this refers to both a concern and a complaint.

3.1 Communication of Complaint

A concern or complaint may be brought directly to the attention of a staff person. In cases the person receiving the complaint is not the designated focal point, the staff shall forward the complaint to a member of the Integrity Team or the Line Manager using the abovementioned reporting channels.¹ This person will acknowledge receipt of the complaint and inform the complainant about the procedure. All concerns and complaints reported will be filed in a complaints register or database, to facilitate monitoring and adequate follow-up.

As said before, concerns and complaints received by partner organizations always have to be reported to Help a Child using the abovementioned reporting channels. Concerns or complaints about (staff of) Help a Child need to be reported to the Integrity Focal point of the Country or if that is not possible the international Integrity Coordinator.

It is possible to raise a complaint anonymously, however it is advisable there is always a way to contact the complainant, or a proxy: someone that can be contacted on behalf of the complainant.

3.2 Analysis of situation

Within 1 week after a concern or complaint has been received by Help a Child a case description is made by the Line Manager, Integrity Focal Point or a person assigned by the Integrity Coordinator. In case of suspected fraud or corruption, this case description will be made by the Finance Manager as described by the Anti-Fraud and Corruption Policy. In case of suspected related to child safeguarding, this case description will be made by the Child Protection Advisor. For a case description all related and relevant information is included in order to be able to make a well-informed decision whether to investigate the allegation. This will be done by (at least) addressing the following questions:

- Is there a complaint? The complaint must be a genuine concern of the complainant, raised in good faith, and is not motivated with the intent for personal gain, personal interest or a grudge. If it is determined that the complaint was not made in good faith, disciplinary measures can be taken.

¹ A concern or complaint about the Line Manager can be directed to the Coordinator Integrity or CEO, a complaint about the Coordinator Integrity can be directed to the Line Manager or CEO, and a complaint about the CEO can be directed to the Coordinator Integrity or the Supervisory Board (except for the Confidential Counselor).

- Does the complaint relate to a breach of Help a Child's Integrity Policy, a violation of any of the Help a Child's policies and guidelines, or a violation of law?
- Is the complainant or anyone else immediately or potentially at risk?
- Is there sufficient information and evidence or is there a need to further investigate?
- At this point, is the allegation conclusive enough to take management action?

The person analyzing the case has the option to request advice from the Finance Manager, (Child) Safeguarding Expert and/or the Coordinator Integrity. For issues at country level it is the Integrity Focal Point of the Country with the Coordinator Integrity who decides on the basis of the case description whether 1) an investigation is justified, 2) suspension of work of any of the staff is necessary (e.g. for safety and protection reasons); and 3) reporting to donor and/or authorities is needed. For issues at international level, it is the CEO together with the Coordinator Integrity who decides on these three factors. Suspension will always be done in a respectful and confidential way. The Integrity Focal Point will share the case report and his/her decision on an investigation with the CEO.

In case a child is involved in the allegation the *Child Safeguarding Policy* needs to be adhered to, in case of suspected fraud the *Fraud and Anti-Corruption Policy* needs to be followed. Furthermore, if the complainant or anyone else involved is at immediate or potential risk, adequate action should be taken to ensure that he/she is protected from any possible (future) harm.

In case a complaint is about a breach of the *Code of Conduct* or *Child Safeguarding Policy* the complaint should always be investigated and the management of Help a Child International should be informed.

Operational complaints (related to program activities) not needing a formal investigation will go through the normal process of action and decision-making of the program implementation team.

The complainant will be informed by the line manager or integrity focal point about the result of the analysis and the way forward. In such a case staff of Help a Child is involved, the person(s) concerned will be informed beforehand about the allegation and the decision to perform an investigation.

3.3 Investigation

If Help a Child decides to perform an investigation this investigation will start as soon as possible. The Coordinator Integrity, CEO and Integrity Focal Point of the Country will appoint a team to be responsible for the investigation. The composition of the investigation team will vary in different situations and depends on the nature of the complaint and the people involved. The team generally consists of an Integrity Team member and the HR Manager. If a child is involved, the Help a Child International Child Protection Expert will be part of the team. In case of suspected fraud or corruption, the Help a Child International Finance Manager will be part of the team. When the incident reported is related to SEA, additional guidance can be found in the UNICEF Section 7.2.



The investigation is guided by the following principles:

- *Protection & Confidentiality:* Investigation of reported incidents always prioritize the protection and interests of the victims, complainants and the accused. When necessary, adequate support will be made available to them. All matters related to complaints are confidential.
- *Impartiality:* the investigation must be conducted in an unbiased, fair and respectful manner.
- *Accountability:* Those who conduct the investigation must adhere to these guidelines and must record accurately and comprehensively the steps which are employed in conducting an investigation. The methods and techniques employed in the investigation must be appropriate for the circumstances and proportional to the objectives of the investigation.
- *Transparency:* Help a Child staff, partner staff and persons of the affected community know that this procedure exists and know how to access those involved in conducting the investigation procedure.

3.4 Follow-up

The investigation team must write an investigation report. This is a summary that should address all aspects of the investigation including how the alleged misconduct was discovered, the steps taken to gather the evidence, the investigators conclusions and the evidence supporting those conclusions. The conclusion of the investigation must be clearly stated in the investigation report. The investigation team will submit the investigation report to the Help a Child Management Team (MT) for consideration and approval. This should demonstrate and document that the complaint has been well investigated, relevant authorities have been informed (if appropriate) and interest and rights of the victim, complainant as well as alleged perpetrators have been respected during the entire investigation process.

Based upon the investigation report, and within one week of receiving the report, the MT will decide upon the appropriate action. The complainant will be informed about the result of the investigation.

3.5 Sanctioning

Appropriate action will be taken if staff is found guilty. Depending on the severity appropriate actions might include termination of contract and legal action if required, as described in the HR Policies. Help a Child has a zero tolerance against physical sexual exploitation and abuse. Any substantiated and proven case of physical sexual exploitation and abuse will always lead to direct termination of employment.



4. Monitoring & Evaluation of the complaints mechanism

The use of the complaints mechanism will be monitored by the Coordinator Integrity in coordination with the country Integrity Focal Points. The Coordinator Integrity together with the country focal points will promote the philosophy behind the procedure through training programs for Help a Child staff and partner staff on integrity related topics and by contributing to various means of quality assurance and accountability.

The Feedback, Complaints and Whistle Blowing Procedure can be updated and reviewed whenever there is a need to upgrade the system. A standard review will be done bi-annually, based on the complaint database – including issues of moral protest or doubt – and policy implementation monitoring results and lessons learned. All Integrity Focal Points share their observations during a bi-annual evaluation Teams-meeting of the Integrity Team. Besides policy revisions, an annual report will be made by the Integrity Coordinator to be shared with the MT.

The complaints database and subsequent lessons learned will be evaluated twice a year during the Strategic Consultation Meeting, which is a meeting with the MT of Help a Child International and the CPDs.



5. Incident Reporting Form

CONFIDENTIAL: Please restrict access to this document and keep it stored safely (e.g. using passwords or encryptions for computers and lock offices when unattended). For SEA cases; always use code names when referring to individuals involved in the case, omit information that could reveal identities (e.g. date of birth, address, phone number, description of unique physical traits) and keep information on the identity and personal details of persons involved separate from incident and related reports.

Name of person reporting

Name	
Age	
Gender	
Specific needs	
Contact details	
Date of reporting	
Reporting channel	
Date of incident	

Description of the complaint/concern

What happened?	
<i>Where did it happen?</i>	<i>Exact location</i>
<i>When?</i>	<i>Date and time</i>
Who was involved as alleged staff/trainee /intern/consultant/ volunteer of HAC?	<i>Description of alleged or suspected perpetrator(s) (e.g. name, age, gender, nationality, organizational affiliation/position, previous record of misconduct)</i>
If any, what are details of the child involved?	
Any other witnesses?	

Intervention so far

What was done so far?	<i>(e.g. referral for assistance, referral to local authorities, investigations, notification of UN/Host Government):</i>
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Action taken by Help a Child (Country director and Management Team)

Case report built	<i>Name, title, contact details</i>			
Investigation of the situation				
Support for victim arranged				
Accused staff member heard	<i>If yes, add date and names of involved staff.</i>			
Support from partners requested	<i>(e.g. support for SEA survivors, investigations)</i>			
Action taken				
Status of allegation	Not valid, dropped	Internally referred	Under investigation	Referred to legal authorities



6. Referral form

CONFIDENTIAL: Please restrict access to this document and keep it stored safely.

Note: Please share copies of filled out referral forms with the survivor and receiving agency and keep a copy for the organization's internal records and follow-up.

Referring agency

Agency/org: Contact:

Phone: Email:

Location

Receiving agency

Agency/org: Contact:

Phone: Email:

Location

Survivor information

Name: Phone:

Address: Age:

Sex Nationality:

Language: ID number

If survivor is a minor (under 18)

Name of primary caregiver: Relationship to child:

Contact information for caregiver: Is child separated or unaccompanied? Yes
 No

Caregiver is informed about referral? Yes No (If no, explain)

Background Information/Reason for referral and services already provided

Has the survivor been informed of the referral?

Yes No (If no, explain below)

Has the survivor been referred to any other organization?

Yes No (If yes, explain below)



Services requested

- | | | |
|---|--|---|
| <input type="checkbox"/> Mental Health Services | <input type="checkbox"/> Protection Services | <input type="checkbox"/> Shelter |
| <input type="checkbox"/> Psychosocial Support | <input type="checkbox"/> Legal Assistance | <input type="checkbox"/> Material Assistance |
| <input type="checkbox"/> Social Services | <input type="checkbox"/> Education | <input type="checkbox"/> Nutrition |
| <input type="checkbox"/> Medical Care | <input type="checkbox"/> Livelihood Support | <input type="checkbox"/> Support for children born as a result of SEA |

Please explain any requested services:

Consent to release information. (Read with survivor/ caregiver and answer any questions before s/he signs below. Sign on behalf of survivor/caregiver if consent is given verbally and survivor/caregiver cannot sign.)

I, _____ **(survivor name)**, understand that the purpose of the referral and of disclosing this information to _____ **(name of receiving agency)** is to ensure the safety and continuity of care among service providers seeking to serve the client. The service provider, _____ **(name of referring agency)**, has clearly explained the procedure of the referral to me and has listed the exact information that is to be disclosed. By signing this form, I authorize this exchange of information.

Signature of responsible party (survivor or caregiver if a child):

Date (DD/MM/YY):

Details of Referral

Any contact or other restrictions? Yes No (If yes, please explain below)

Referral delivered via: Phone (emergency only) E-mail Electronically (e.g., App or database) In Person

Follow-up expected via: Phone E-mail In Person. By date (DD/MM/YY):

Information agencies agree to exchange in follow up:

Name and signature of recipient:
(DD/MM/YY):

Date received

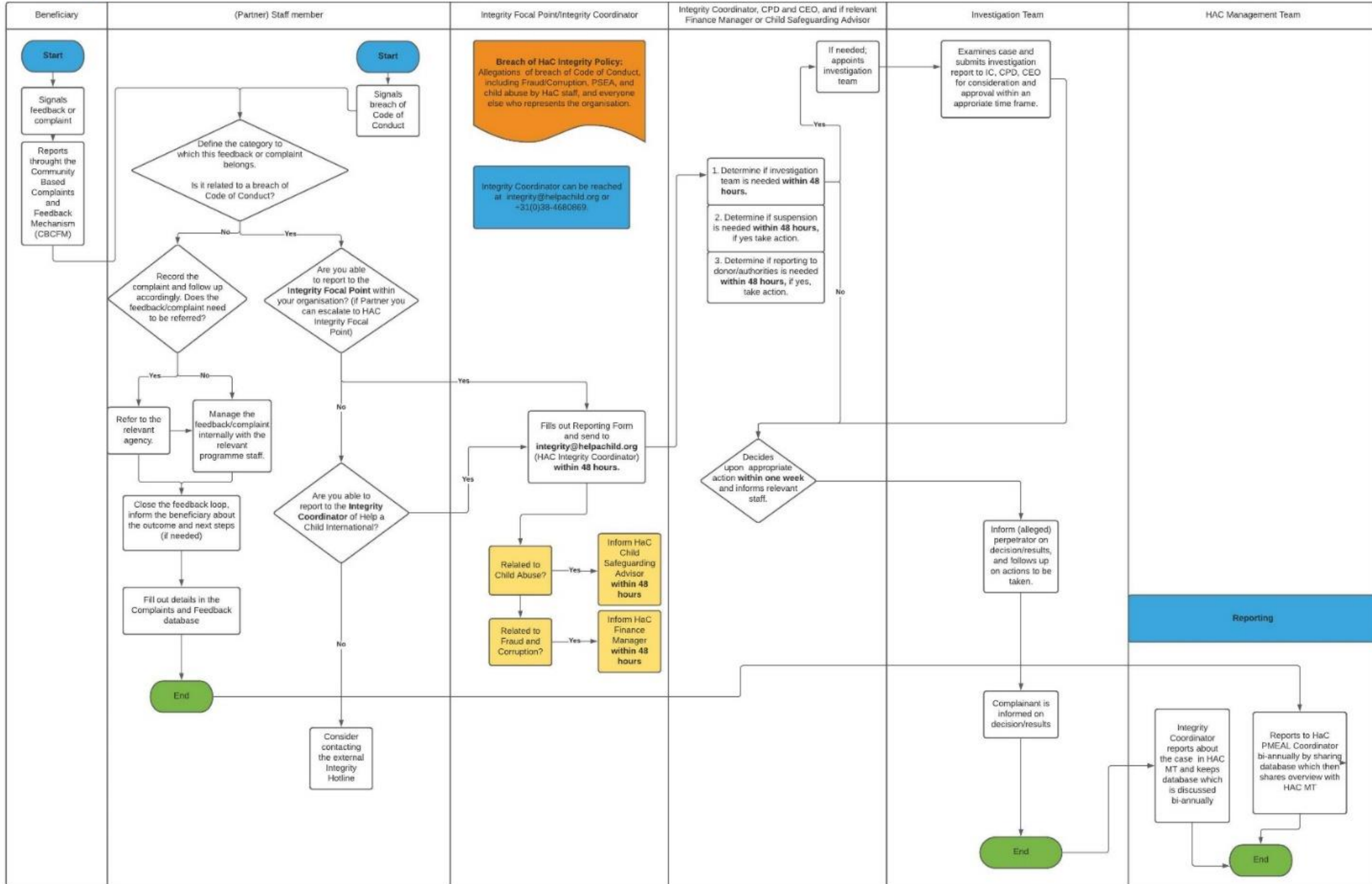


7. Reporting and response flowchart

On the next page you can find the reporting and response flowchart.



Integrity Flow Chart



Help  a
CHILD