Gorta Group Complaints and Response to Complaints Mechanisms

The purpose of this policy is to set out steps to deal with, receive and respond to complaints from the people we work with.

This policy applies to the Gorta Group (GG) Board, United Purpose Board, all Gorta Group (and subsidiary companies) employees including affiliate organisations and to all paid and unpaid consultants, contractors, interns, secondees, visitors and volunteers that provide supplies, services or support to Gorta or promote its work at any of its locations. All such parties are referred to 'employee' in this document.

Hereafter "Board" is employed as a collective term and refers to the GG Board as well as the boards of Self Help Africa UK, Self Help Africa NI, United Purpose, Concern Universal, Partner Africa, TruTrade and the boards of any entities that may form part of the group in the future. The Gorta Group is employed as a collective term and refers to Self Help Africa, United Purpose, Concern Universal, Partner Africa, TruTrade or other entities that may form part of the group in the future.

The policy also applies to Gorta Group partners, vendors and other third parties where it is included or referenced in a relevant bid or tender documents, agreements, memorandums, purchase orders or contracts.

Version Control

Version No.	Date	By (Name, Position)	Details of changes	Reviewed and approved by (Name, Position)
1	24.5.2018	**David Dalton, Executive Director**	**N/A**	**SHA Board on 24.5.2018**
2.	22.10.2022	**David Dalton, Executive Director**	**Rebrand**	

David Dalton
Executive Director

Peter McDevitt
Chief Finance and Operations Officer

PURPOSE
It is the policy of GG to conduct our work in an honest, open, and ethical a manner and in compliance with the law.

This document focuses on the complaints handling elements, definition of concepts on complaints and feedback, core principles, parameters, and scope of the GG, and provides practical guidance in implementing basic mechanisms for handling complaints and feedback.

CATEGORIES
The Gorta Group has six categories of issues received through our Complaints and Complaints Response Mechanism (CRM). These include:
1. Request for information
2. Request for assistance
3. Feedback
4. Minor dissatisfaction with activities
5. Major dissatisfaction with activities
6. Fraud, theft, corruption, verbal/physical/sexual abuse and/or exploitation

In addition, disclosures can be received from Internal Audit, staff or other parties (such as suppliers or partners) that fit the Category 6 description. All complaints and disclosures, irrespective of their scale, that fit the description of Category 6 must be escalated to Head Quarter's in Dublin. Even small-scale cases of fraud or any form of abuse must be highlighted, in case they are indicators of a wider systemic risk.

Category 5 major dissatisfaction complaints are also considered important, but should be dealt with in the first instance by in-country complaints handling procedures. During the course of an investigation, the country programme management may find it necessary to re-categorise a complaint to a Category 6. In such an instant, this Policy will apply in respect of escalating the issue to HQ.

WHAT TO REPORT
If related to the groups or a group entity implemented programme, ANY allegation of fraud, corruption, physical or sexual abuse/exploitation - irrespective of scale or about whom it is raised - should be reported as per the Initial Serious Wrongdoing Report within 24 hours to Dublin.

DEVELOPING THE COMPLAINTS AND COMPLAINTS REPONSE MECHANISM
Beneficiary/community stakeholder consultations will be held to inform the design of both the Complaints and Complaints Response and Information Sharing mechanisms, as well as media – posters, awareness raising campaigns, etc.

DEFINITION OF TERMS AND CONCEPTS
A Complaint is a grievance made against a Gorta Group entity or more specifically against one of its employees, associated "consultants" or partners where the organisation has allegedly failed to meet a commitment. That commitment might be related to our activities, our use of resources, our mission and values, staff conduct / behaviour or a legal requirement. It is a criticism that expects a reply and would like things to be changed.

Feedback is a positive or negative informal statement of opinion which is shared for information only but not with the intention of lodging a formal complaint. Feedback is all about provision of information

either positive or negative to make changes in programme/project implementation. Feedback may not always require response; it is general and can be used as learning purpose.

COMPLAINT AND COMPLAINTS RESPONSE MECHANISM IN THE GORTA GROUP

The Gorta Group recognises the fact that for a Complaint and Response Mechanism (CRM) to be effective it has to incorporate the following principles:

- o **Confidentiality**: Community members have a right to expect that their privacy will be respected, and their complaint will be investigated in a confidential manner
- o **Accessibility**: Community members will be given a range of contact options. Including a dedicated phone line, email address, face to face meetings, community meetings
- o **Safety**: It is crucial to look at the local context (general safety, political, cultural aspect) and conduct possible Risk-assessment. The safety of specific person who complains and provide feedback is an essential component in the mechanism.
- o **Transparency**: Details on how the complaint will be handled, by whom and the response time frame should be given to the complainant

The following are the core principles of the groups CRM:

- o All complaints and constructive feedback will be taken seriously whether submitted from a named source or anonymously.
- o All complaints will be handled swiftly so far as reasonably practicable depending on the nature and complexity of the matter, ensuring that they are dealt in a timely manner.
- o The process for making a complaint will be made clear to stakeholders.
- o All complaints will be recorded on a centralized database held at HO.
- o Complaints will be addressed at national level (field and Head Office), using the agreed complaint procedure and only escalated to management or Head Quarters if they are of a serious nature.
- o Sufficient resources and expertise will be provided to handle complaints.
- o Staff will be briefed on the nature and purpose of the policy and senior managers dealing with the complaints will be given training in handling complaints.
- o Confidentiality relating to the complaint will be safe guarded so far as reasonably practicable including the person(s) to whom the complaint is addressed.
- o Issues of conflict of interest will be identified to ensure objectivity.
- o Complaints will be handled in accordance with the groups policies and procedures and in accordance with local laws and regulations.
- o Country Directors, International Directors, Affiliate Executive Directors and the Chair of the Board at the governance level depending upon the nature and level of complaints will be the key people to receive external complaints.

Who is the CRM designed for?

- o Gorta group's direct and indirect target beneficiaries.
- o Individuals, organised community groups, structures and institutions.
- o Local government structure.
- o Government offices at national, regional and local level.
- o Development agencies and institutions.
- o Private sector.
- o Gorta Group staff and partners.

PARAMETERS AND SCOPE OF THE GORTA GROUPS COMPLAINTS RESPONSE MECHANISM

The Gorta Group can only accept feedback and complaints which are about matters that are within our power to respond/answer or solve:

- o Gorta Group entities individually as an organisation.
- o The Group's programmes/projects and activities.
- o Behaviour of Gorta Group staff.
- o Gorta Group's partner organisation's and the behaviour of their staff

MECHANISMS FOR CAPTURING FEEDBACK AND COMPLAINTS

In consultation with communities the following systems to explain how GG deals with complaints and to capture complaints will be designed and implemented:

- o **Community meetings**: Feedback from stakeholders can be collected during needs assessments, community sensitisation, trainings, workshops, during distribution of inputs (NFIs, chemical product for water treatment, food etc.), monitoring of interventions, quarterly and bi-annual review meetings, closure session and evaluation through wider community meetings.
- o **Face to face**: Reporting to the office, staff, etc.
- o **Individual house to house visit** and **collecting feedback** during monitoring visit especially for a person with disability - see Annex 2
- o **Dedicated Phone Line Number**: Where possible, GG will capture any feedback or a grievance on programme /project related and staff behaviour through assigning dedicated Mobile Phone line number ***********. It is possible to use the "call me back" service by dialling ********* This phone number for feedback and complaints is published GG's Whistleblowing posters located at field and HO levels.
- o **Feedback Community Members**: GG will be using "Feedback Community Members" (FCMs) to collect and address feedback and complaints from communities we work with. These members are selected by the community and comprise of a male and a female. These selected members will be present during all the key meetings in order to collect feedback or complaints from beneficiaries. One of the main criteria of the FCMs is that they should be literate. The FCMs will be given a registration book (with pre-set columns to be filled please see Annex 1) to record all feedback and complaints. Registration books will be regularly be checked by the foca GG member of staff who will in turn collate the feedback/complaints and send it on a calendar quarterly basis to the Focal Person at HO using a pre-defined template please see Annex I. Responses that can be addressed at field level will be addressed as soon as possible. Complaints/Feedback that need HO involvement will be addressed within the pre-defined time frame as set out on Table 1, Page 5.
- o **Functional Traditional and Community Based Feedback and Complaints Response Mechanisms**: Traditional feedback and conflict resolution mechanisms can be assessed and used as feedback for complaints.
- o **Monitoring visits**: GG's staff regular monitoring field visits can be used to collect feedback and handle complaints. A dedicated form that can be found as Annex 2 will be used to collect accountability related information during Monitoring Visits

DEALING WITH COMPLAINTS

1. Upon receipt of a complaint it will be recorded on the appropriate form by the GG focal person.
2. The form with the complaint/s will be sent to the HO focal person.
3. The HO focal person will enter the complaint in the Complaints and Feedback database - Annex 3 - and will classify it as Serious or Operational.

4. Should the complaint be of a Serious then the Serious Wrongdoing steps are to be followed.
5. Operational Complaints are to be dealt as much as possible at field level.

Table 1: The type of feedback and complaints, and timeframe to provide the responses

Categories	Example	Category of the Type of the Complaint	Duration or timeframe to provide responses for the complaints (Within)
1. Request for information	*How did you select the participants of this project?*	Operational Complaints	7-14 days
2. Request for assistance	*Can the Gorta Group support my son with Educational Materials?*		
3. Feedback	*We want to thank GG for the great support you've given our community*		
4. Minor dissatisfaction with activities *	*The food oil received is not enough* *It would be better to provide cassava cuttings instead of maize seed* *I was not selected to receive assistance but I am more in need than my neighbour who received assistance.*		
5. Major dissatisfaction with activities*	*There were weevils in the flour provided by GG last month* *My neighbour has been stealing from me since I received GG assistance*	Serious Complaints	24 hours
6. Fraud, theft, corruption, verbal/physical/sexual abuse or sexual exploitation	*Fraud: GG staff asked us for money in return of the water chemicals.* *Physical Abuse: One of GG staff hit my child.* *Verbal Abuse: An GG representative made offensive comments* *Psychological Abuse: A community facilitator is bullying my daughter* *Sexual Abuse: I have heard rumours that a project staff member is buying gifts for a 14-year-old girl and has asked to marry her* *Exploitation: A member of your staff is giving additional commodities to female beneficiaries in exchange of favours*		

* The difference between major and minor dissatisfaction is that major dissatisfaction causes immediate harm to the beneficiary and needs urgent attention. Minor dissatisfaction is also important but not life threatening.

Annex 1: GG - Feedback and Complaints from Feedback Community Members (FCMs) Collection Format

S/N	Location	Date	Name of the Participant	Complaint Received	Action taken at field level (Y/N)	Date of action taken	By whom	Type of Action taken*

*This action could be (referral to HO) or if handled at field level description of the action taken at field level

Annex 2: Gorta Group accountability field monitoring tool

Date   _____

Name of Respondent

_____

Location

_____

Project Name

_____

Project Sector

_____

1. Are you a participant in this project?   Yes   No

2. Do you know the selection criteria for this project? (regardless of the answer to question 1)

Yes   No
If yes, please elaborate

_____

If project participant, please go to question 3.

3. What are your entitlements under this project?

_____

4. [1]Do you know who the donor of this project is?   If Yes (please elaborate)   No

_____

5. Do you know the duration of the project? (or when it will end)   if Yes (please elaborate) No

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[1] Please note the answer should be the official donor, so not the Gorta Group

Annex 3: GG Target Beneficiary Feedback and Complaints Tracking Database

DATE	LOCATION	PERSONAL DETAILS OF COMPLAINANT **Name** **Telephone number** **Address**	DETAIL OF THE COMPLAINT (a detailed description of the complaint the person has made)	Category (1-6)	WHO RECEIVED THE COMPLAINT	OUTCOME (explain what has happened as a result of the complaint)	FOLLOW UP REQUIRED Yes/No & by Whom	FEEDBACK GIVEN Yes/No & by Whom and When	APPEAL Yes/No	Feedback given	Case closed Yes/N Date