FEEDBACK AND COMPLAINTS HANDLING

INTERNATIONAL POLICY SUPPORT DOCUMENT

WORKING PAPER
Only for implementation in specified pilots

PUTTING POLICIES AND QUALITY STANDARDS INTO PRACTICE
KEY USERS
Mandatory for: Member associations piloting the Feedback and Complaints Handling mechanism

RELATED POLICIES
Basic policy: Who We Are
Core policy: Child Protection Policy
Quality standard: Good Management and Accountability Quality Standards

RELATED DOCUMENTS, TOOLS, SYSTEMS
Core policies and quality standards
Human Resources Manual (available on intranet for co-workers)

Policy support documents
Anti-Fraud and Anti-Corruption Guideline
Working together to protect children: GSC roles and responsibilities in child protection reporting and responding (available on intranet for co-workers)
Child safety is everybody’s business: Child safeguarding reporting and responding procedures in member associations (available on intranet for co-workers)
Code of conduct
Crisis Communication Policy Support Document (available on intranet for co-workers)

DEVELOPMENT PROCESS
Approved by: Management Team (MT)
Original language: English

CHANGE HISTORY
<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Changes</th>
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<tbody>
<tr>
<td>1.0</td>
<td>May 2016</td>
<td>Six member associations (MAs) and the General Secretariat (GSC)</td>
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1 OBJECTIVE AND PURPOSE

SOS Children’s Villages works with children, families, local communities, governments, donors, and other relevant stakeholders to prevent family breakdown and ensure that every child’s right to family, protection, education and health care is fulfilled. We always strive to provide the highest quality care and support. In this regard, we recognise the importance of learning from the people, communities and partners with whom we work, so we can continually improve the quality of our work. Thus, we welcome feedback and complaints regarding our work, and we use these inputs to foster organisational learning. This approach is embedded in our overall results-based management concept, which stresses our obligation towards the children, families and communities with whom we work, as well as our donors and other stakeholders, to continually improve the way we work and demonstrate what we are doing to achieve the intended results.

The SOS Children’s Villages document ‘Who We Are’, which articulates our values of courage, commitment, accountability and trust, provides the foundation for our approach to dealing with feedback and complaints.

This international policy support document provides a framework for global implementation, and is linked to the application of our Good Management and Accountability Quality Standards. The procedures defined in this policy support document represent the minimum requirements that are mandatory for the General Secretariat (GSC) of SOS Children’s Villages and all SOS Children’s Villages member associations (MAs). In addition to mandatory requirements, some recommendations for further actions are made, which could be useful for MAs when implementing the framework according to their specific national context.

This policy support document defines the principles, standards and procedures that enable external stakeholders to submit their feedback and complaints and how SOS Children’s Villages responds to these. Regulations in this document exclude topics such as as child safeguarding, fraud and corruption, and international sponsorships, which have their own dedicated policies and processes. (See section 2 for scope.)

As external stakeholders we consider children, young people and families participating in SOS programmes, community members, non-governmental organisations, governmental organisations, donors and supporters, media and other partners such as suppliers or alliance partners.

Internal stakeholders, specifically staff of SOS Children’s Villages, can raise their feedback and complaints through regular processes established by Human Resources. More information can be found in our Code of Conduct.
2 SCOPE

SOS Children’s Villages welcomes any feedback or complaint related to services, actions and policies for which the organisation is responsible or which are within our sphere of influence (e.g. face-to-face suppliers).

Complaints concerning child safeguarding, fraud and corruption, as well as international sponsorships are not in the scope of this policy support document. These topics require very specific attention and procedures, which are defined in the following independent, special processes:

- Child safeguarding concerns and allegations: Please see our website for further details. (Co-workers can also consult the intranet pages for details.)
- Fraud and corruption allegations: Steps to be taken concerning reporting, investigation and responding are stated in our Anti-Fraud & Anti-Corruption Guideline, which is available on our website.
- Complaints related to international child and village sponsorships can be sent to donor.services@sos-kd.org. (Co-workers can also find detailed instructions on the intranet.)

This policy support document focuses on types of feedback and complaints not covered by the above mentioned processes. Examples include feedback and complaints on:

- Overall programme quality, including emergency programmes
- Advocacy
- Fundraising
- Other topics

This document focuses on a process that gives all external stakeholders an easy-to-use format to share their feedback and complaints. In addition to the channels and entry points described in this document, we also have other mechanisms, e.g. regular evaluations, through which we encourage stakeholders to share their feedback and complaints. However, these mechanisms are not in the scope of this document.
3 PRINCIPLES

SOS Children’s Villages’ values of trust, accountability, commitment and courage, as described in ‘Who We Are’, build the foundation for interacting with people, providing feedback or raising a complaint, as well as for taking action and learning from the feedback received.

3.1 TRUST

We are committed to living up to the trust put in us, treating every person who shares feedback or complaints with the highest respect and appreciation. In the same way, we also appreciate that people share their concerns fairly and appropriately.

Moreover, stakeholders can trust that we treat the personal information of complainants confidentially. We also understand that in some cases complainants want to share their feedback and complaints anonymously.

3.2 ACCOUNTABILITY

We put in place fair, secure and transparent reporting channels at all levels of the organisation to allow stakeholders to be heard. Moreover, we are transparent and ensure that the process for bringing up feedback or complaints is known to external stakeholders.

Feedback and complaints are handled as closely as possible to the programme or relevant office to which they refer, involving the next level of supervision in cases where a conflict of interest may arise.

3.3 COMMITMENT

We are committed to reviewing every single feedback or complaint carefully and to resolving it in a timely manner. All feedback and complaints are acknowledged promptly (within seven days) and responded to as quickly as possible (within 30 days).

3.4 COURAGE

We are determined to courageously question our ways of working, so we can learn and continuously improve.
4 PROCESS FOR HANDLING FEEDBACK AND COMPLAINTS AT SOS CHILDREN’S VILLAGES

EXTERNAL FEEDBACK OR COMPLAINT

1 RECEIVE FEEDBACK OR COMPLAINT
MA: feedback.country@sos-kd.org (or similar e-mail addresses) + other national/programme channels
SOS Children’s Villages International / GSC: reporting form on website

2 REGISTER FEEDBACK OR COMPLAINT
Using the standard register

3 ACKNOWLEDGE RECEIPT OF FEEDBACK OR COMPLAINT
Within seven days

4 FORWARD FEEDBACK OR COMPLAINT
Input is forwarded to relevant unit (MA, GSC office, etc.)

5 CONSIDER FEEDBACK OR RESOLVE COMPLAINT
Each feedback/complaint is processed in the relevant unit

6 RESPOND TO COMPLAINANT
Within 30 days, informing on course of action to resolve issue, result of action, or ongoing status; option given to appeal response

7 RECEIVE APPEAL OF COMPLAINANT

8 CLOSE MATTER
Recorded as closed in the register

9 IMPLEMENT IMPROVEMENTS AND FOLLOW-UP ACTIONS
(e.g., input into planning)
4.1 RECEIVE A FEEDBACK OR COMPLAINT

On federation level, feedback and complaints can be addressed through the reporting form on the SOS Children's Villages International website and through the e-mail address info@sos-childrensvillages.org. During the piloting phase, the responsibility for receiving, recording, acknowledging receipt, monitoring and responding to feedback and complaints coming in via the international website or e-mail address lies with the Digital Fundraising unit of the International Competence Centre (ICC) Fund Development and Communications (FDC) in the International Office (IO).

Each MA is required to define clear contact points for stakeholders to provide feedback or raise complaints regarding the areas in scope (see section 2) and ensure proper communication of their channels to their stakeholders, e.g. through publication on the website, distribution of information leaflets, etc.

As a minimum requirement, MAs establish a dedicated e-mail address for external stakeholders to provide feedback and complaints in scope (see section 2 for details). The e-mail address can have the following format: feedback.country@sos-kd.org. This e-mail address can be complemented by a reporting form on the national website (similar to the form on the international website), or by other channels as relevant.

The national/managing director of the MA assigns the responsibility for receiving feedback and complaints coming in via the e-mail address and the sequential steps of recording, acknowledging receipt, forwarding and responding to a specific unit in the national office. (At programme level, responsibilities can also be assigned, in addition.) The MA shall also refer to the international website entry point, to provide an international escalation option.

When setting up their national feedback and complaints handling mechanisms, MAs must carefully consider national data protection laws.

Feedback and complaints concerning areas that are out of scope (i.e., child protection, corruption, sponsorship; see section 2 for details) are forwarded directly and dealt with within the special processes.

Additional recommendations:

According to the local context, additional contact points might be established by the MA. These could be a telephone number, suggestion boxes, a help desk, face-to-face meetings, etc. Special consideration should be put on developing mechanisms that are child- and young people-friendly to gather feedback and complaints at programme level, as well as other ways that enable all programme participants to provide feedback or complaints (e.g. people without reading or writing skills).
4.2 REGISTER FEEDBACK OR COMPLAINT

All available information is recorded, also for anonymous feedback and complaints. Such feedback and complaints are handled according to the same process (acknowledging and responding only if communication with the anonymous complainant is possible).

Feedback and complaints concerning areas that are out of scope (i.e., child protection, corruption, sponsorship; see section 2 for details) are forwarded without recording. Information is recorded within the special processes only.

Any recorded information must not violate anyone’s right to privacy. Personal data shall be recorded in fully anonymised form only. Possible further requirements under applicable national data protection laws must be observed.

4.3 ACKNOWLEDGE RECEIPT OF FEEDBACK OR COMPLAINT

All feedback and complaints addressed to SOS Children’s Villages should be acknowledged as soon as possible, and at the latest within seven days. Acknowledgement can be done immediately via an auto-reply, or via a personalised message. This applies also to feedback and complaints received via other channels than the e-mail address or reporting form, e.g., written or oral reports, social media, etc.

Receipt of anonymous complaints can only be acknowledged if a communication channel is provided (e.g. anonymous e-mail address).

4.4 FORWARD FEEDBACK OR COMPLAINT

Feedback and complaints are handled as closely as possible to the programme or relevant office to which they refer, and thus, are forwarded to the appropriate unit or office. Forwarding shall happen on the same day as the acknowledgement.

Feedback and complaints concerning areas that are out of scope (i.e., child protection, corruption, sponsorship; see section 2 for details) are forwarded to the respective units without registering or acknowledging.

When forwarding feedback or complaints, confidentiality of sensitive data needs to be considered. Generally, personal data shared shall be adequate, relevant and not excessive in relation to the purpose. Appropriate technical and organisational measures (implementing a strict need-to-know principle regarding recipients; where applicable, encryption of email/attachments; confidentiality reminders) shall be taken against unauthorised access, loss, destruction or damage of the personal data.

Conflict of interest

When a complaint about the leader of a specific unit is raised, the complaint is forwarded to the immediate next level of supervision, to avoid a conflict of interest.
4.5 CONSIDER FEEDBACK OR RESOLVE COMPLAINT

All feedback and complaints are considered and resolved by the respective expert unit in the MA or GSC (e.g., international offices in the regions (IORs), ICCs, etc.), or if escalated, by the respective next level. Here, the respective unit leader decides how to address the matter (e.g., assign responsibility to gather information, run an investigation, etc.).

If the assessment leads to the conclusion that allegations in a feedback or complaint are justified, appropriate actions, including disciplinary actions if necessary, are taken according to organisational policies and procedures.

If warranted, SOS Children’s Villages will also initiate civil and/or criminal proceedings against individuals involved in inappropriate conduct.

4.6 RESPOND TO FEEDBACK OR COMPLAINT

SOS Children’s Villages provides a response to complainants explaining the outcome of the feedback or complaint as quickly as possible, but at the latest within 30 days. If it takes longer than 30 days to resolve the complaint or provide relevant information, the complainant is informed within 30 days that additional time is needed and – if known – when they can expect an answer. After the first 30 days until the final answer is provided, an e-mail informing the complainant that we are working on the issue is sent at least every 30 working days.

With the final response we provide information on which steps can be taken. If the complainant is not satisfied with the response, an appeal is possible (options for appealing are described in section 4.7).

4.7 RECEIVE APPEAL

If complainants are not satisfied with the response received by SOS Children’s Villages, or if they believe the corrective action is not appropriate, they can always appeal to the next level.

If complaints referring to an MA are not resolved satisfactorily, the complainant can refer their feedback or complaint to the GSC, using the entry points highlighted in 4.1. If the GSC does not resolve the feedback or complaint satisfactorily, the complainant can refer to the President of SOS Children’s Villages International, using the GSC entry point (e-mail address provided in 4.1). The Digital Fundraising unit of ICC FDC will then forward the complaint to the President.

SOS Children’s Villages is a member of the INGO Accountability Charter. Thus, if complainants are unhappy with the response after appealing to the next level within SOS Children’s Villages, they can also refer their feedback or complaint to the INGO Accountability Charter. The full details of the Charter’s complaints handling process are available on their website at www.ingoaccountabilitycharter.org.
4.8 CLOSE THE MATTER

When the responsible unit in the GSC or within the MA has communicated the outcome of the complaint or feedback, the case is closed.

4.9 IMPROVEMENTS AND FOLLOW-UP ACTIONS

Implementing improvements based on feedback and complaints helps us to continually improve the quality of our work as a learning organisation.

Immediate improvements
Certain feedback or complaints call for immediate action and improvements. The respective unit in the MA or in the GSC is responsible for implementing the improvements in line with management decisions.

Improvements that enter the planning process
On an annual basis, MAs are required to provide an overview of feedback and complaints they received from January through December to the Digital Fundraising unit of ICC FDC.

National management teams should review their feedback and complaints reports annually and consider them as input into the annual planning process.

On federation level, the Digital Fundraising unit of ICC FDC prepares an annual overview of feedback and complaints received by the GSC. Additionally, a consolidated report (consisting of the GSC overview and national overviews) is prepared by Digital Fundraising for the MT and external reporting. This information is also used as input for planning and improving our work.

Within the GSC, IDR s and IDCCs annually review feedback and complaints received in their areas and consider them as input into the annual planning process.

5 APPENDIX:
ABBREVIATIONS USED IN THE DOCUMENT

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<th>FDC</th>
<th>Fund Development and Communications</th>
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<tr>
<td>GSC</td>
<td>General Secretariat</td>
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<tr>
<td>IDCC</td>
<td>International Director Competence Centre</td>
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<td>IDR</td>
<td>International Director Region</td>
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<td>INGO</td>
<td>International Non-Governmental Organisation</td>
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<td>IO</td>
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<td>IOR</td>
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<td>MA</td>
<td>Member Association</td>
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