



Programme Feedback and Complaints Policy



Cover: Members of a self-help group in Zambia at their weekly meeting © CBM/Hayduk
Above: Disabled People's Organisation (DPO) group meeting – India
© CBM/argum/Einberger

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Introduction

CBM is an international Christian development organisation, committed to improving the quality of life of people with disabilities in the poorest communities of the world. CBM envisages an inclusive world in which all persons enjoy their human rights and achieve their full potential. An open attitude to feedback and complaints on our work is paramount to CBM's ability to improve as an organisation, to facilitate learning, and to break down donor - recipient power dynamics when working with others.

This policy demonstrates CBM's openness and responsiveness to any type of feedback including suggestions and complaints, in order to be accountable to all we work with and who may be affected by our work, most importantly people with disabilities and their communities as well as our partners. We want this policy to foster collaboration towards development outcomes that are owned by the people and communities we work with, and to give confidence and clarity on complaints handling.

This policy replaces the previous "Feedback and Complaints Handling Position Paper" from 2015 and aligns with CBM's:

- a) Programme Quality Framework (2018) supporting CBM's efforts to maintain and improve effective accountability to all stakeholders as stated in the related commitment: "Create awareness on and maintain a well-functioning, accessible feedback and complaints mechanism that is actively used by partners and communities, and review action taken in response to feedback and complaints received".¹
- b) Partnership Principles (2019) where we state under 'Mutual Accountability and Responsibility': "We recognise that we can always improve and therefore aim to create an environment which encourages partners and their stakeholders to give feedback and to clearly communicate their expectations and hopes. Providing

1. https://www.cbm.org/fileadmin/user_upload/Publications/CBM_Programme_Quality_Framework_2019.pdf
2. https://www.cbm.org/fileadmin/user_upload/CBM_Safeguarding_Policy_2018.pdf

feedback mechanisms for decision making, complaints and conflict resolution – including mechanisms for reporting serious incidents anonymously - is an important way to encourage this.”

- c) Safeguarding Policy² where we state under ‘Preventive Actions’: “All partners and sub-partners should develop inclusive and child-friendly (if working with children) approaches to programming for all stakeholders. This includes development of feedback mechanisms that are child friendly (if working with children) and accessible.”



‘Bridge the Gap’ community worker Zebenay Gebre Hiwot speaks during an awareness raising event in Woreta, Ethiopia © CBM/Hayduk

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Definitions

Feedback is an opinion about CBM's development or humanitarian work which may be positive (a compliment), neutral (such as a suggestion for improvement), or negative (a complaint). Feedback is an instrument of accountability, because it enables a dialogue. Being accountable to the people we seek to assist requires that CBM takes into account their opinions, concerns, suggestions and complaints.

A **complaint** is feedback expressing dissatisfaction about the standards of service, systems and processes, actions or lack of action by CBM or its staff, volunteers or anybody directly involved in the delivery of our programme work. It is a criticism that expects a reply and would like things to be changed. Complaints could, for example, include a concern from someone we work with about the quality of programme delivery, concern from a member of the community where we implement our projects, poor compliance with our policies and procedures, or a concern about the behaviour of our staff, volunteers or contractors in correspondence with our Code of Conduct.

3. https://www.cbm.org/fileadmin/user_upload/CBM_Code_of_Conduct_December_2018V2.pdf
4. https://www.cbm.org/fileadmin/user_upload/CBM_Safeguarding_Policy_2018.pdf

CBM's **Code of Conduct**³ defines behaviour, which is ethical, legal, and consistent with the organisation's Values, Mission and professional standards. It serves as reference and its breach can result in disciplinary action.

CBM's **Safeguarding Behaviour Code** as part of our Safeguarding Policy gives additional guidance. Safeguarding children and adults-at-risk, notably including those at risk of sexual exploitation or harassment, is a core policy⁴ commitment of CBM.

Stakeholders: this policy defines a feedback process which is open to all stakeholders impacted by CBM's programme work including CBM staff, partner staff, community members and target groups of CBM's work, and requires to be visible and known to all stakeholders.

CBM **programme work** encompasses all aspects related to project implementation including strategy, systems and processes, advocacy and technical advisory work as well as safeguarding including prevention of any sexual exploitation, abuse or harassment.

2 / Scope

CBM is committed to being fully accountable to persons with disabilities, their families and representative organisations, the wider communities or the sector or area we work in or other stakeholders that we impact with our work. The CBM Programme Feedback and Complaints Policy applies for all feedback relating to CBM's programme work, and CBM supports feedback mechanisms with our partner organisations.

Feedback has to be about an activity for which CBM is responsible or is within our sphere of influence. However, the Feedback and Complaints Policy creates no independent legal obligations and no legal recourse in any court against a decision or activity taken by CBM.

Feedback and complaints are not:

- general queries about CBM's work;
- requests for information;
- requests for additional budget;
- contractual disputes;
- requests to amend records, postpone deadlines, transfer funds or goods.

The scope of this policy does not cover feedback to individual CBM Member Associations from donors or supporters on their domestic practices.



Shalom plays with her friends during play time, Uganda © CBM

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Purpose



CBM fieldworker talks with villagers in India © CBM

By maintaining a trusted and responsive feedback and complaints system, CBM seeks to integrate continuous learning and improvement into our organisational striving for excellence. This policy is a reflection of CBM's value of professionalism and represents an important point of contact between our stakeholders and organisational operations. The main purpose of this policy is to

- 1.** Comply with accountability and rights:
 - a) internal or external requirements and standards;
 - b) peoples' rights to have their voices heard; and
 - c) for CBM to be held to account by communities, partners and any other actor we collaborate with on the promises we make.
- 2.** Foster empowerment: the feedback mechanism as a way of empowering the communities we serve through participation and dialogue.
- 3.** Create trust and transparency by listening and being responsive.
- 4.** Serve prevention of abuse as people gain confidence and trust to report.
- 5.** Enable early warning: help identify risks and issues that can be remedied at an early stage.
- 6.** Support monitoring and evaluation: feedback as a way of improving programme quality through addressing concerns and issues raised by all relevant stakeholders.

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Working with Partners



Two CBR workers sit and converse using sign language with Sajud Daimari at his bicycle repair shop in Assam, India © CBM

In support to our commitment to accountability, CBM accelerates efforts to ensure awareness amongst all stakeholders on the existence of our confidential global programme feedback/complaints mechanism. In CBM supported projects regular information is provided on its existence and all partner staff should be made aware.

As outlined in CBM's Partnership Principles⁵ effective partnership also involves recognising that power imbalances exist, and we seek to demonstrate and encourage in our partners the attitudes and styles of working to change this dynamic. In this context, active listening and respectful but honest and timely communication plays a key role in demonstrating our commitment to genuine partnership, ownership, mutual accountability and learning.

It is important to clarify mutual expectations, purpose of partnership, standards and compliance requirements at an early stage. CBM encourages the use of our programme feedback mechanism for positive, negative or neutral feedback (compliments, complaints, or suggestions for improvement). Thereby, we hope to grow trust and respect as well as a culture of joint learning.

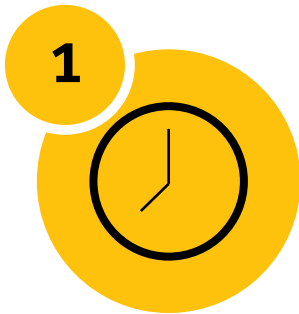
We likewise expect and actively support our partners to have (or be in the process of developing) their own feedback and complaints system adapted to the local culture which enables them to deal appropriately with feedback received from community members and target groups regarding work supported by CBM. Such accessible and contextualized feedback mechanisms and their set up need to be agreed on during participatory and inclusive project planning processes and laid down in the "Project Plan".⁶

5. https://www.cbm.org/fileadmin/user_upload/Publications/CBM_Partnership_Principles_2019.pdf

6. CBM Guidance Note on Project Design Form requests information on the envisaged set up of a Feedback system in the framework of project planning

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CBM's **six Principles** for Handling of Feedback and Complaints



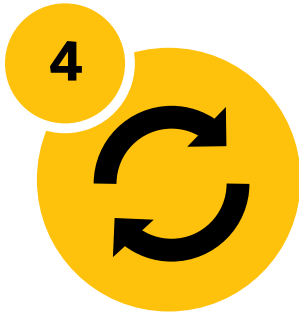
Timeliness



Confidentiality



Mutual respect



Participation & Accessibility



Commitment to learning



Resources

1. Timeliness

While CBM aims to respond to all feedback, complaints need to be attended within three (3) working days upon receipt. This response includes seeking to make contact with the complainant, to acknowledge receipt and inform on the follow-up.

CBM aims to resolve all complaints within one (1) month of receipt. If a complaint cannot be resolved within this timeframe, the complainant will be kept informed monthly about the progress made to date and when they can expect to receive further updates.

2. Confidentiality

CBM understands that confidentiality is essential to the viability of any feedback system.

For complaints, the complainant's identity will be kept confidential to any organisation or individual outside of the investigation team. The details of the complaint will only be shared on a need to know basis. CBM will ensure the complainant details (specifically any identifying information) are securely filed and only accessible to the trained CBM personnel handling feedback. The complainant details will be used to make contact with the complainant to gather further information or update on the progress of feedback.

In case a complainant wishes to file a complaint anonymously there is the possibility to use the Whistle-blowing System for providing complaints or feedback on programme work (see Annex II).

7. Extract from CBM Accessibility Policy available at: <https://www.cbm.org/in-action/disability-inclusive-development-did/disability-inclusive-development-publications/>

3. Mutual respect

All feedback is to be addressed in an equitable, objective and unbiased manner. Everyone who makes a complaint to CBM will be treated with courtesy and respect. In return, CBM expects people who lodge a complaint to communicate their concerns fairly and appropriately. Where complainants harass staff, behave abusively, or unreasonably pursue complaints, CBM reserves the right to withdraw or modify its complaints process and not to investigate feedback that it judges as unfounded or frivolous.

4. Participation & Accessibility

CBM is committed to promoting equal access and participation of all women, men, girls and boys with disabilities in the countries in which we work. It is CBM's responsibility, in line with the Convention on the Rights of Persons with Disabilities, to ensure and promote accessibility based on the Principles of Universal Design in all spheres of our work.⁷ Participation of the target group and their community during project planning and implementation will ensure that we jointly create, implement and support the development of feedback and complaints mechanisms which are made available to all stakeholders considering location, gender, age, ethnicity, disability and language. Reasonable accommodation will facilitate access and use at the community level.

5. Commitment to learning

CBM will log and monitor all feedback that meets CBM's definitions as outlined in this policy. Acknowledging that learning outcomes are derived from both positive and negative experiences, both positive and negative forms of feedback (including complaints) will be incorporated into CBM's procedures for monitoring feedback. The outcomes will be reported and analysed to assist in the identification of systemic and recurring problems and inform improvements to service delivery.

6. Resources

CBM is committed to allocating resources to ensure CBM management, staff, volunteers and partners are aware of CBM's commitment to receiving, responding to and learning from feedback. CBM resources are also allocated for the training of specific staff to respond to feedback, lead effective case management and provide appropriate follow up to feedback and complaints received. Staff trained accordingly will form a complaints committee who will manage any investigation that might be needed and jointly take decisions and find a resolution.

Our partners are supported at reasonable levels through our joint project plans for the set-up of accessible and culturally adapted feedback system by their own organisations.

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Providing Feedback to CBM

Feedback including compliments, suggestions or complaints can be sent to:

E-mail: feedbackprogramme@cbm.org

Or a letter to:

**CBM International
Programme Support
Attn: Feedback Manager
Stubenwald - Allee 5
64625 Bensheim,
Germany**



Anyone who wishes to provide feedback or lodge a complaint is requested to indicate his/her full name, relationship to CBM and contact information. If you want to provide a complaint, please include as much information as possible (who, where, when, what). We do not recommend to send anonymous complaints, because it makes it more difficult for CBM to assess the case, to find an effective resolution and record it. In case a complainant wants to send concerns anonymously, please consider using CBM's Whistle-blower System as outlined in Annex II.

Complaints should be provided within three months of the relevant incident. In exceptional circumstances CBM may be able to respond to a complaint that refers to a matter that occurred more than three months ago, but it will likely make it more difficult to resolve the complaint satisfactorily.

For further information on the internal process for handling the feedback or complaint please refer to Annex I.

Details of how this Policy works alongside other CBM feedback and reporting mechanisms can be found in Annex II.

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Dealing with Informal Feedback in CBM

CBM strongly encourages that informal comments and concerns about CBM's work are raised with our staff or partner organisations as close to the activity as possible. This allows for immediate response and responders know the context.

All CBM staff are expected to actively encourage feedback and complaints and log it on behalf of any stakeholder from the community, our target groups, the staff of our partner organisation or from any Disabled People Organisation (DPO) or other (international) organisation in the countries where we work.

Any material feedback received in this form that requires further follow up can be logged officially using the mechanisms outlined in this policy. Alternatively, any of the complementary mechanisms can be used as appropriate (see Annex II for details).

In CBM any feedback received which may constitute a suspicion or evidence of a safeguarding or criminal incident is taken seriously and will be reported and investigated through established procedures. Under no circumstance should an individual undertake an incident investigation outside of the formal CBM mechanisms.



Suman, who has bilateral clubfoot and is a client of CBM partner in Nepal is chatting with his sister Puja at their home

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Governance and Accountability

Governance and management policy implementation actions:

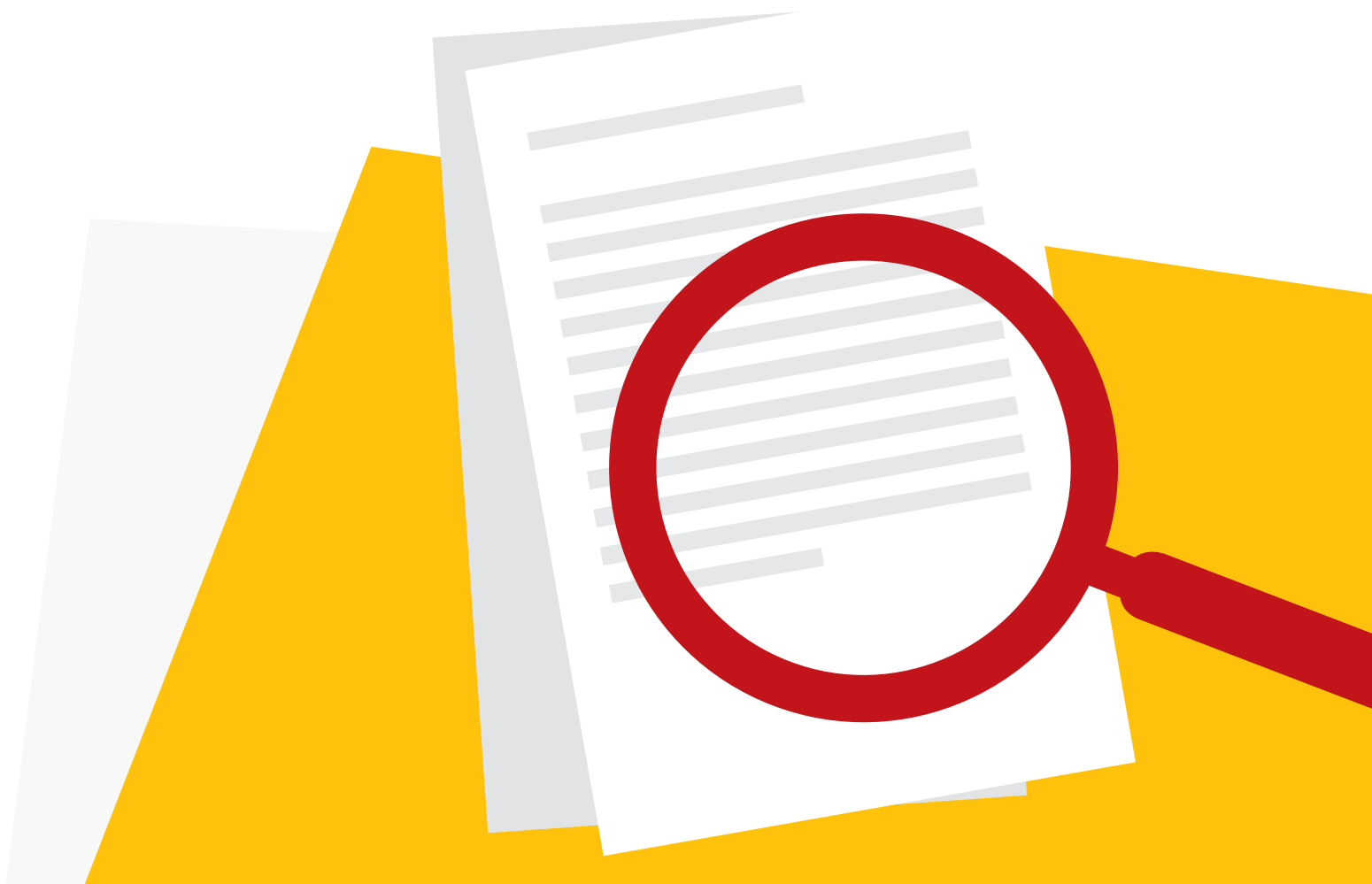
1. CBM will integrate feedback and complaints handling mechanisms into relevant core programming processes.
2. Regional Hub Directors and Country Directors will ensure local implementation of the provisions of this policy in the following ways:
 - a. Ensure that all staff, representatives and partners are informed about this policy and their responsibility to take in feedback and complaints from all stakeholders.
 - b. Provide information on CBM's Feedback and Complaints mechanism in CBM offices
 - c. Support partners to develop and apply contextualised feedback/complaints mechanisms, ideally in relation to and aligned with safeguarding mechanisms and staff competencies.

Monitoring and review of Policy:

The Feedback and Complaints Policy replaces the 2015 Feedback/Complaints Handling Position Paper and is based on previous CBM frameworks, lessons learnt and consultations with staff and partners globally.

The implementation of the policy will be monitored through standard tools and processes related to capacity assessment of partners and CBM Country Offices.

The policy will be reviewed and, if necessary, revised every three years, or earlier if needed.



Annex I: Feedback Handling Procedure

Stage 1: Receiving the complaint

- 1) Activity or behaviour related to CBM programme prompts feedback
 - The feedback may come from an internal or external stakeholder e.g. CBM staff, volunteer, partner, community member.
 - Feedback may be positive or negative.
- 2) The individual may provide feedback through the appropriate feedback mechanism from the list provided in Section 5, or the feedback is provided to a CBM staff member (in verbal or written form).
 - Safeguarding concerns are handled in alignment with the CBM Safeguarding Policy.
 - Confidential/anonymous feedback submitted through the whistle-blowing mechanism will be handled in line with the CBM Whistle-blowing Policy.
 - All other feedback will be dealt with in line with the following procedure.
 - Informal or verbal feedback is submitted to the Programme Feedback and Complaints Mechanism at feedbackprogramme@cbm.org.

Stage 2: Acknowledging, assessing and investigating

- 3) The feedback is categorised as positive or negative.
 - Positive feedback is recorded and shared with the appropriate CBM team members for learning purposes. The provider of feedback will receive an acknowledgement of receipt.
 - Negative feedback (i.e. complaints) will follow the below procedure (steps 4-7).

4) The responsible staff confirms to complainant that the complaint has been registered within 3 working days and requests further information as required. The staff member will verify the complaint is indeed related to CBM/partners' activity. Identify complaint (where, what, etc.).

5) The complaints committee (trained responsible staff and senior members of staff) will discuss the case and undertake an investigation as necessary, applying appropriate case management.

- Confidentiality of the complainant will be maintained, and stakeholders only involved on a need to know basis. If necessary, external investigators may be used to support interviews and fact finding.

Stage 3: Resolving the complaint

6) If the complaint is deemed to be legitimate, a solution will be found (in agreement with the complainant, if appropriate).

- If the complaint is deemed to be unfounded or not solved in a satisfactory way, the complainant will be informed, including the possibility of appeal.
- Until the complaint is closed, the complainant will be kept updated monthly.

Stage 4: Documenting and learning

7) The details of the complaint and documentation of the handling process are recorded in the CBM feedback register. The complaints register will be used to inform organization-wide learning processes. A report with anonymised information and learnings will be produced annually and submitted to Executive Management.

Annex 2 : Overview of available CBM feedback and complaints mechanisms

Apart from CBM's Programme Feedback and Complaints Mechanism there are a number of complaints and feedback entry points available for different purposes. They include mechanisms where incidents of abuse can be reported. The table below summarises the range of mechanisms available to both external and internal stakeholders.

Programme Feedback and Complaints Mechanism

Available for concerns, complaints, compliments or suggestions about the nature or quality of programme delivery, poor compliance with our policies, systems, processes and procedures, CBM's lack of action, or concern the behaviour of CBM staff, volunteers or contractors. This system is not anonymous about, but all complaints are treated as highly confidential.

Contact: **feedbackprogramme@cbm.org**

or send a regular letter to:

CBM International

Programme Support

Attn: Feedback Manager

Stubenwald-Allee 5

64625 Bensheim, Germany

For whom: External and internal: Open to anyone affected by CBM's work, including partner organisations and target group/community

Link: <https://www.cbm.org/about-cbm/reporting-channels-and-safeguarding/>

Whistle-blower System

A protected area on our international website allows everybody to anonymously report irregularities, risks, safeguarding incidents or violation of CBM's Code of Conduct by completing a structured report format.

For whom: External and internal: Open to anyone affected by CBM's work, including partner organisations and target group/community

Link: <https://www.cbm.org/about-cbm/reporting-channels-and-safeguarding/>

Safeguarding Incidents

(suspected, witnessed or disclosed to you) can be reported through the following mechanisms:

- To the safeguarding focal person in CBM's local office via phone, email, text, skype, face-to-face. If the safeguarding focal person is not available, report to either the Country Director or Regional Hub Director.
- To the CBM Global Safeguarding Manager: safeguarding@cbm.org

For further information please refer to CBM Safeguarding Policy, 2018.

For whom: External and internal: Open to anyone affected by CBM's work, including partner organisations and target group/community

Link: https://www.cbm.org/fileadmin/user_upload/Publications/cbm_child_safeguarding_policy_2018_accessible.pdf

General questions about CBM's Programme work can be provided through our general 'Enquiries contact form' on our international website www.cbm.org/contact/

CBM International
contact@cbm.org
Stubenwald-Allee 5
64625 Bensheim
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www.cbm.org