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About Catholic Relief Services

Catholic Relief Services is the official international humanitarian agency of the Catholic community in the United States. CRS saves, protects and transforms lives in more than 100 countries, without regard to race, religion or nationality. Our relief and development work is accomplished through programs of emergency response, HIV, health, agriculture, education, microfinance and peacebuilding.

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Acronyms

AAR after action review

CHS Core Humanitarian Standard

CP country program

CRS country representative
CRS Catholic Relief Services

EFOM Emergency Field Operations Manual

FAQ frequently asked question

FCRM feedback, complaints and response mechanism

FGD focus group discussionGBV gender-based violenceHoP head of programmingHoOps head of operations

HQ headquarters

IASC Inter-Agency Standing Committee

ICT4D information and communications technologies for developmentIFRC International Federation of Red Cross and Red Crescent Societies

KII key informant interview

MEAL monitoring, evaluation, accountability and learning

MoU memorandum of understanding

OGC Office of General Counsel
PIA privacy impact assessment

PM program manager

PII personally identifiable information

PMF Protection Mainstreaming Framework

PMWG Protection Mainstreaming Working Group

PSEA protection against sexual exploitation and abuse

SEA sexual exploitation and abuse

SMILER+ Simple Measurement of Indicators for Learning and Evidence-based Reporting

SOPs standard operating procedures

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Roadmap to the Guide

The Feedback, Complaints and Response Mechanism Guide includes these sections:



INTRODUCTION presents the role of FCRMs in upholding CRS' organizational values, principles and commitments related to accountability, safeguarding and adaptive management.



SECTION I provides an overview of the FCRMs and is relevant to all CRS staff and partners, including senior leadership. This section presents steps and quality standards for FCRM design, start-up, implementation and close-out.



SECTION II explains the FCRM quality standards in each FCRM step, as well as practices for requesting and responding to feedback and complaints, both sensitive and programmatic. This section is for project managers, program staff, MEAL staff, emergency program staff in protracted or long-term responses, and any other staff who oversee FCRM design, start-up, implementation and close-out. The chapters in this section outline the four steps of the project cycle.



FCRM IN EMERGENCIES outlines key actions for applying the FCRM quality standards in rapid-onset emergency responses, the early stages of emergency responses, and early recovery. This guide is relevant to emergency response and early recovery teams, both programming and MEAL, and country program operations teams supporting these responses. The *FCRM in emergencies guide* is attached to this PDF, or visit the <u>EFOM site</u> to access it.



COMPENDIUM OF FCRM TOOLS consists of 12 hands-on tools for teams to use and adapt in FCRM practice. These tools are attached to this PDF, and editable versions can be downloaded from the <u>EFOM FCRM</u> website.



GLOSSARY of key terms related to feedback, complaints and response mechanisms.

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Introduction

Catholic Relief Services developed this guide to strengthen feedback, complaints and response mechanisms, or FCRMs, across all programs, responses and contexts in which it operates. FCRMs help ensure programmatic and operational decisions are informed by local perspectives and priorities, and contribute to the protection of program participants from harmful impacts and conduct. These mechanisms are successful when supported by sufficient financial and human resources, and linked to institutional systems and incentives for upholding accountability, safeguarding and continual improvement of services and programs.

"Feedback, complaints and response mechanism" is often abbreviated to "feedback and complaints mechanism" or "feedback mechanism." "Feedback" can encompass both feedback and complaints.

FCRMs
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Requesting and responding to feedback and complaints is linked to organizational values such as placing the rights, dignity, priorities and needs of people affected by crisis, poverty and injustice at the center of everything CRS does. CRS' contributions to social change and development rest on the quality and authenticity of relationships, partnerships and solidarity and, thus, this guide is designed to reinforce practices that support CRS' <u>Guiding Principles</u>, ethical practices, integral human development approach and Catholic social teaching.¹

This guide builds on agency learning and industry good practice, and aligns with the CRS Safeguarding and MEAL Policies. Further, the guide reinforces the role that FCRMs play in equity and inclusion, local leadership and safeguarding, as articulated in the CRS 2021 Program Quality Standards.² FCRMs support these core competencies central to the <u>CRS 2030 strategy</u> implementation:

- Monitoring, evaluation, accountability and learning: Consistently high-quality monitoring, evaluation, accountability and learning contribute to superior program performance and quality assurance that over time enrich integral human development. CRS invests accordingly to actively and openly document and share our successes, failures and learning with both internal and external audiences for the ultimate betterment of the lives of the people we serve.
- Safeguarding vulnerable people: CRS is committed to holding itself to the highest standards of safeguarding of the people we serve. CRS will continuously strengthen its policies, practices and procedures to ensure that staff, operations and programs do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse.³

^{1.} Integral Human Development (IHD) is central to CRS agency strategy and the work CRS does with partners.

The concept, based on Catholic social teaching, affirms that human development cannot be reduced or separated into component parts.

^{2.} The CRS 2021 Program Quality Standards reference FCRMs in Benchmarks 2.5 (Equity and Inclusion), 6.2 (Local Leadership), and 10.5 (Safeguarding). The PQ Standards 0—— are available on the CRS SharePoint site.

^{3.} In Their Own Hands: CRS 2030 Strategy (CRS) p.25.

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This guide reflects CRS' work as part of the Protection Mainstreaming Working Group, or PMWG, and should be used alongside the <u>Protection Mainstreaming Framework</u> to enhance the safety, dignity and meaningful access of all program participants to essential support and services.

This guide's development was informed by relevant guidance documents and the practices of many peer organizations, as well as industry-wide standards, such as the Core Humanitarian Standard (CHS) and guidance produced by IASC Results Group 2 on Accountability and Inclusion. FCRM practice at CRS is integrated with the Compass Project Management Standards and with the SMILER+ approach to MEAL system development.

Complaints are welcomed and addressed

As a member of the CHS Alliance, CRS is committed to applying and promoting the Core Humanitarian Standard across development and emergency programming. CRS will conduct biannual self-assessments against all CHS commitments, to improve performance and enhance the quality and accountability of programming and operation. The CHS Alliance quality criterion related to FCRMs states that complaints are welcomed and addressed (CHS Commitment 5). To self-assess against CHS Commitment 5, Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints, CRS will seek partner and community member perspectives and opinions on existing FCRMs and develop an action plan to strengthen these as a result of each assessment cycle.

The guide is also informed by the CRS principle of subsidiarity,⁴ and encourages codesign and co-implementation of FCRMs to foster local leadership. National and local organizations are on the ground before, during and long after a crisis is over, and have longstanding relationships with communities supported by CRS. These partner organizations play a key role in ensuring accountability and adaptive program management that strengthen trust and relationships, and center on community members' rights, voices and choices. In recognition of these primary relationships, it is recommended that partners continue to operate FCRMs after project close for continuity of accountability and safeguarding. In all partnerships, existing partner policies on accountability to communities should be understood and respected, and any partner FCRMs integrated into the new FCRM.

Accountability

The process of using power responsibly, and taking account of and being held accountable by stakeholders, primarily those who are affected by the exercise of such power.

Subsidiarity is the understanding that communities, who are the closest to challenges, are the artisans of their own development.

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Who is this guide for?

The guide is a technical resource for CRS teams and partner organizations who design and implement FCRMs at the country program, project and response levels. The guide identifies key roles for program and MEAL staff throughout the FCRM process and is also relevant for senior leadership in creating a strong enabling environment for FCRMs.

The guide is designed to meet the capacity levels and needs of teams, while considering the distinct local context and community needs. The steps and quality standards in this guide are relevant for teams beginning FCRM design as well as those seeking to improve upon existing FCRMs.

The guide is designed to meet the capacity levels and needs of teams, while considering the distinct local context and community needs.

Section I: Overview of Feedback, Complaints and Response Mechanisms

Purpose and utility

Experience from CRS and our partners shows that well-designed FCRMs support the consistent practice of listening to and using local input in decisions that affect people's safety, lives and livelihoods. The benefits of FCRMs are interconnected and support the needs of CRS, our partners and the communities we serve:

- Program relevance and quality FCRMs support an ongoing practice of listening, requesting feedback and complaints about CRS-supported services, and using this information in decision-making. Program teams can also use feedback to test assumptions, theories of change and contextual understanding. Acting on this feedback in a timely manner improves programs by making them relevant, context appropriate, better targeted, conflict sensitive and adaptive.⁵
- Accountability FCRMs are one means by which people can claim their rights and entitlements. CRS demonstrates its accountability, responsiveness and respect by valuing community input, working hard to maintain open communication and trust, and taking responsibility for decisions and actions taken in partnerships and projects. When staff and partners actively seek and prioritize community feedback, this helps right power imbalances by enabling local input to shape programs and operations.
- Protection and safeguarding FCRMs enable CRS to learn about and respond in real time to protection and safeguarding concerns—such as misconduct by CRS or partner staff or other organizations operating in the local context—as well as to changes to security or risks to people's safety. This information is critical to ensure that CRS and our partners provide safe and dignified programming, identify and address potential risks created or increased by programming, and report allegations of abuse, exploitation and corruption.

FCRMs support the consistent practice of listening to and using local input in decisions that affect people's safety, lives and livelihoods.

Allegation

An assertion of facts that are intended to be proved or during an internal investigation procedure.

Enabling environment

Effective feedback processes require a culture of listening, reflection, analysis and adaptiveness. Thus, well-functioning FCRMs require an enabling environment, technical skills, and changes in program teams' and partners' behaviors. Senior leadership have a direct responsibility to create an environment conducive to accountability, and to foster an organizational culture of openness to receiving and responding to feedback and complaints internally and externally.

^{5. &}lt;u>The State of the Humanitarian System 2018</u> (ALNAP 2018) references a statistically significant correlation between feedback and consultations with increased program relevance and quality.

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There are various strategies available to enable such an environment, and the best way is to lead by example:



Culture of feedback Senior leadership demonstrate the importance of accountability when they routinely model attitudes and behaviors in which feedback is seen not as a threat but as an opportunity to respond or improve, and where clear, transparent and responsive two-way communication is seen as essential for working effectively and for adaptive management. This includes ensuring a safe environment for staff and community members to report safeguarding issues.



Responsiveness to staff Senior leadership demonstrate their full commitment to accountability by being responsive to staff feedback. Staff have valuable perspectives that can improve the relevance and quality of services and projects. By modeling the process of feedback and response internally, senior managers help set the tone for all staff to be accountable to communities, program participants and partners.



Review FCRM data Senior leadership should regularly check on the responsiveness of the FCRM, request feedback trends to inform program and operational decisions, and update program staff and participants on decisions taken in response to wider feedback trends.

Collective accountability

Senior leadership should share relevant trends in community feedback with peer organizations at cluster- or country-level coordination meetings to inform collective accountability across the overall response, consortia and partnerships.



FCRM in partnership Initial discussions between senior leaders can clarify expectations related to FCRMs and risk management to ensure the systems established are respectful and include existing policies and procedures, and contribute to the sustainability of FCRMs as feasible.



Resources for FCRM Senior leadership can ensure FCRM effectiveness by allocating sufficient human and financial resources to FCRMs, and clarifying roles and responsibilities related to FCRM functions and decision-making processes in response to feedback.



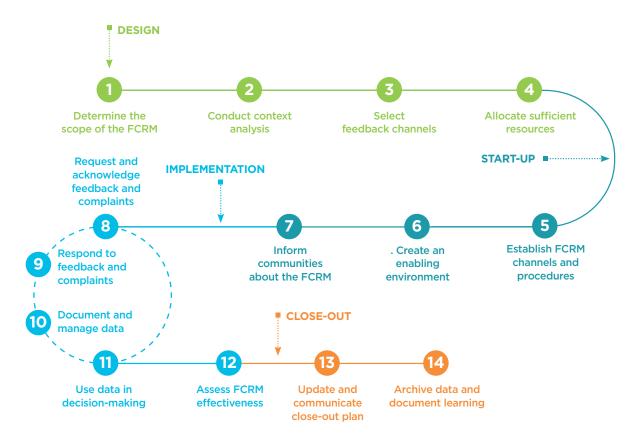
Institutional mainstreaming Senior leadership can demonstrate their commitment to accountability and the values underpinning FCRM by ensuring that community feedback, and a commitment to protection and safeguarding, are integrated into:

- Country or response strategies
- Recruitment processes
- Staff onboarding
- Professional development plans
- Performance management processes
- Partnership agreements or memorandums of understanding
- Internal and external reporting

FCRM steps

The FCRM steps in this guide are organized by project cycle phases of design, start-up, implementation and close-out. These steps may also be applied outside of the project cycle when developing a country-program-level FCRM or when improving existing FCRMs. The steps in each phase are described below.

Figure 1: FCRM steps



Introducing Compass

The FCRM steps are organized by CRS' four phases of project management, which support high-quality management of emergency and development projects across the agency. Teams are encouraged to integrate FCRM activities into the 18 project management standards and associated key actions as presented on the Compass website. Key opportunities for integration with Compass are denoted throughout the guide with the Compass icon.

■ **Design** Key steps focus on analyzing the local context, the selection of FCRM channels based on community communication preferences and sufficient budget, and staffing to support quality start-up, implementation and close-out.

- **Start-up** Project and MEAL staff develop standard operating procedures for FCRMs, collaborate to establish the appropriate FCRM channels and protocols, train staff, and provide communication and orientation about the FCRM to communities.
- Implementation Feedback and complaints are documented, acknowledged, analyzed and shared with relevant staff for timely response and action, or referred outside of the organization. Action includes real-time program adaptations and reflection to inform future improvements. The FCRM is updated as needed during implementation to optimize effectiveness and utility.
- Close-out FCRM data are de-identified and archived. The FCRM is integrated into larger organizational systems, handed over to partners or closed. Evaluation results related to the FCRM, including larger feedback trends and the contribution of the FCRM to larger program quality and impact, are shared with project design teams to inform future proposals and design processes.

Think accountability

Commitment to accountability and safeguarding should be uppermost in the minds of staff as they implement FCRMs. To be effective, FCRMs should never be seen as a tick-the-box exercise by staff or community members.

Quality standards

The FCRM quality standards ensure the effectiveness of the mechanism, increase its utility and enhance communities' trust in the process. The quality standards below are linked to each step in the process, and further explained and supported in the guidance narrative. While the quality standards are applicable across programming, teams may need to adapt the guidance to implement each standard in a way that is appropriate to the local context, builds upon teams' capacities and existing FCRM systems, and addresses any current gaps.

Partnership approach

The FCRM steps and quality standards are informed by the CRS partnership approach. Partner involvement and joint management of the FCRM processes are part of each step and quality standard. Specifically, FCRM design and implementation seeks to identify, build on and integrate existing partner policies on accountability, safeguarding, feedback and complaints. The quality standards and recommended practices in this guide can also be used to support the capacity strengthening, process improvement and sustainability of partner-led FCRMs. Thus, the term "staff" refers to both CRS and partner organization staff.

The term "staff" refers to both CRS and partner organization staff. DESIGN START-UP IMPLEMENTATION CLOSE-OUT

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM COMMUNITIES RESOURCES CHANNELS RESOURCES CHANNELS ENVIRONMENT COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

Table 1: FCRM steps and quality standards

FCRM STEPS	QUALITY STANDARDS			
FCRM design				
Step 1. Determine the scope of the FCRM	■ Ensure efficiency, collaboration, participation, local leadership and sustainability in FCRM design.			
Step 2. Conduct context analysis	Design FCRMs to be responsive to community communication needs, barriers, perceived risks and preferences by reviewing existing data and conducting staff interviews and inclusive community consultations.			
Step 3. Select feedback channels	 Select feedback, complaints and response channels that provide meaningful, dignified and safe access for community members. Include static and active FCRM channels that support face-to-face and anonymous communication. 			
Step 4. Allocate sufficient resources	Equip the FCRM with robust staffing structures. Integrate FCRM costs into country program and project budgets.			
FCRM start-up				
Step 5. Establish FCRM channels and procedures	 Embed FCRMs in MEAL and project management processes. Map external service providers and establish a referral process for protection concerns and out-of-scope issues. Develop FCRM data management systems and protocols to protect the dignity and confidentiality of people who provide feedback and complaints. 			
Step 6. Create an enabling environment	 Clarify roles and responsibilities for FCRM implementation among program and MEAL staff. Communicate and demonstrate to all staff the purpose of the FCRM and CRS commitments to accountability, program quality and safeguarding. Cultivate listening and facilitation skills among staff to support effective FCRMs. 			
Step 7. Inform communities about the FCRM	 Communicate to diverse community members the role of the FCRM in upholding accountability and safeguarding principles in practice. Inform community members of the code of conduct, their rights and entitlements, and how to report concerns about misconduct or harm. 			
FCRM implementation				
Step 8. Request and acknowledge feedback and complaints	 Demonstrate the value of feedback and complaints in communication with community members. Actively request feedback and complaints during project implementation to complement passive FCRM channel communication. 			
Step 9. Respond to feedback and complaints	 Respond promptly to programmatic feedback and complaints using appropriate channels. Complaints related to safeguarding are confidentially and safely escalated to support response and action. Use referral pathways to support program participants and communities in accessing available protection services. Monitor levels of satisfaction with the FCRM to enhance accountability to the communities we serve. 			
Step 10. Document and manage data	Apply good practices for data management and data protection to FCRM data.			
Step 11. Use data in decision-making	 Regularly analyze FCRM data to provide timely and user-friendly feedback and complaints trend reports for review, decision-making and action. Triangulate feedback and complaints with MEAL data to inform ongoing decision-making and adaptive management. 			
Step 12. Assess FCRM effectiveness	 Conduct FCRM effectiveness checks to ensure channels are safe, accessible and trusted by community members for programmatic and sensitive feedback and complaints. Use evaluations to contribute to project and agency learning about effective FCRMs. 			
FCRM close-out				
Step 13. Update and communicate close-out plan	Integrate FCRM close-out into wider project close-out decisions and activities. Communicate the close-out plan to communities and other stakeholders.			
Step 14. Archive data and document learning	 Apply responsible data values and principles when archiving FCRM datasets. Communicate the learning from FCRM design, implementation and close-out with programming and MEAL communities and other stakeholders. 			

Feedback and complaints categories

FCRM categories help staff to determine the appropriate actions to document, refer, escalate and respond to each type of feedback and complaint, and are an essential resource in designing and implementing an FCRM. A brief description of each category is presented in Table 2 below, and the full resource with examples and key actions is presented in Tool 1: Feedback and complaints categories.

Tool 1: Feedback and complaints categories Describes the key feedback and complaints categories and key actions to

manage and respond to each type.

USE DATA IN

Table 2: Feedback and complaints categories

Table 2. Feedback and Complaints Categories						
CATEGORY		DESCRIPTION				
Programmatic	1. Request for information	Questions about current project activities, services and eligibility, or about the organization.				
	2. Request for individual project support	A request by an individual to receive project services that have not been supplied due to a potential targeting error or larger access issue.				
	3. General suggestions for service and program improvements	Feedback on relevance, quality and appropriateness of services and programming. A request to change how support is provided in current or future projects.				
	Appreciation of services or support	Appreciation of current activities or support provided.				
	5. Complaint about services or support	A complaint or expression of dissatisfaction about timeliness, appropriateness or quality of services or support.				
	6. Any alleged violation of the CRS Code of Conduct and Ethics or Safeguarding Policy	An allegation of misconduct involving CRS staff (including interns, volunteers, partners, vendors and suppliers, or other aid workers). Includes: safeguarding issues, harassment, abuse or exploitation, fraud or misuse of project resources, and unprofessional behavior.				
Sensitive	7. Other protection issues	An allegation of exploitation or abuse that <i>does not</i> involve CRS staff, partners or other aid workers, or an allegation of protection concerns ⁶ affecting the communities we support. This includes any reference to exploitation or abuse committed by, for example, a government official, schoolteacher, community member or family member.				
	8. Safety and security concerns	Information related to the safety or security of CRS staff, offices or goods; of partners or any humanitarian organization; or of the communities we serve.				
Other	9. Out-of-scope feedback	A request for support not provided by the project, or programmatic feedback on support provided by another actor. No safeguarding violations or issues of protection from abuse or fraud are included in this category.				

^{6.} Protection concerns refer to situations of violence, discrimination or human rights violations that may affect members of a community. They can be facts or just rumors. For instance, a report that refugees are increasingly being denied access to health facilities in one area, or that children are dropping out of school to participate in cash-for-work activities by other NGOs, or that women and girls have been attacked on a certain road.

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Section II. FCRM and the Project Cycle

CHAPTER 1: DESIGN



FCRM design may take place within the broader project design process or it may take place at an organizational level, across multiple projects. Based on the local context, FCRMs may be shared across projects in a country program, operated jointly with consortium partners, or built on existing structures at the community level. Regardless of FCRM scope, community input should be at the heart of its design. Community input will help determine which channels will build trust in the FCRM and ensure safe access for all community members. Consider how teams already gather community input through participatory needs assessments and community consultations as these provide an early opportunity to ask community members about communication preferences, to better understand barriers to people's engagement in and access to different channels, and about any perceived risks around raising concerns to CRS and its partners.

Community input should be at the heart of FCRM design.

Fostering local leadership and sustainability

Design the FCRM to fit operational and programmatic needs, and to contribute to longer-term local leadership and sustainability aims.

Initial FCRM design decisions are largely a programmatic responsibility, and staff should include safeguarding and protection focal points in the design decisions to ensure protection mainstreaming and safeguarding considerations are addressed in the selection of individual feedback, complaints and response channels. MEAL staff can coordinate the needs assessments and community consultations that inform design decisions, while senior leadership can engage with organizations, as needed, to finalize FCRM design. In ① emergency contexts, the emergency coordinator may assume many of these roles.

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By the end of the design phase, teams should have:

- Determined the scope of the FCRM.
- Discussed sustainability, handover and/or close-out with partners, where relevant, and documented decisions in a memorandum of understanding (MOU) or sustainability plan.
- Analyzed the local communication landscape through existing knowledge, secondary sources and previous project data.
- Consulted diverse community members on their preferred channels for feedback, complaints and response.
- Selected relevant and appropriate channels, and ensured that at least one is suitable for sensitive complaints.
- ✓ Developed a budget and staffing plan for the FCRM.
- Referenced organizational roles and responsibilities for the FCRM in partnership agreements or MOUs.
- ✓ Documented the FCRM design decisions in the **SMILER+ FCRM** workshop planning template.

Foster participatory processes

Participatory processes ground program choices in evolving local priorities, and lead to relevant and effective programs and better outcomes. Feedback and complaints are just one type of information that CRS and our partners collect to understand the many ways that assistance and operational decisions are impacting communities. Feedback and complaints complement other data gathered by project and MEAL teams, and can triangulate and validate other data to improve an understanding of people's experience of activities and services provided by CRS.

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Example of an integrated FCRM in Haiti

In 2013, CRS Haiti implemented a community resettlement and rehabilitation program integrating emergency and recovery with multiple components, including livelihood support, and water, sanitation and hygiene. The team put in place a feedback mechanism called *Tandem* (translated as "we are listening to you"). The following elements made this FCRM highly effective:

- Proximity to program participants. CRS operated sub-offices in five neighborhoods in Port-au-Prince and had a designated accountability team and community liaison officers based in most sub-offices.
- Regular in-person communication with communities. Part of the community liaison officers' role was to collect feedback and complaints during weekly neighborhood and household visits.
- An open community meeting was held every two months by CRS and attended by representatives of each neighborhood, partners, program staff and community liaison officers. Teams shared information about program objectives and activities, and promoted Tandem channels.
- Multiple communication channels. CRS established and maintained the following CP-level and project-level channels for participants and partners to be in touch with feedback and complaints:



Hotline (toll-free number):
People submitted feedback and complaints or inquired about the status of previous requests and complaints. CRS spent less than \$50 a month to rent the line, which operated daily from 8.30 am to 12.30 pm. The accountability officers rotated on a weekly basis to answer calls.

SMS messages were accepted on the Tandem hotline.



Community meetings enabled the sharing of information and reporting on adaptations based on feedback.



Complaint forms carried by staff during project monitoring visits enabled them to receive and record complaints on the spot. The form had a detachable coupon that was given as a receipt to the complainants for tracking and follow-up purposes.



Email was used mainly by partners, particularly at the start of the project.



Drop-in visits at CRS sub-offices enabled program participants to speak to staff in person.



Suggestion boxes at sub-offices and the main office enabled anonymous and out-of-hours complaints.



Letters could be mailed or dropped in at sub-offices or the main office.

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Step 1. Determine the scope of the FCRM

The scope of an FCRM has multiple dimensions that should be considered during design. Here, scope refers to how an FCRM will function to support the responsiveness of the overall country program team and individual projects, as well as to potential joint management of FCRM channels with other organizations. FCRM scope may be at the project or country program level. In addition, when defining FCRM scope, the team should seek to complement existing traditional or community-level mechanisms and partner-led mechanisms. When determining whether to build on these existing systems, the team should consider the accessibility of the channels to all community members. Within consortia, program teams may choose to set up an FCRM that is shared between members.

Ensure efficiency, collaboration, participation, local leadership and sustainability in FCRM design.

In the design of an FCRM, consider the country program's operational context, project-specific needs, the effectiveness of existing mechanisms, opportunities for complementary and joint mechanisms, and relevant donor and agency requirements. Use Tool 2: Context analysis checklist to integrate considerations of efficiency, collaboration, local leadership and sustainability in determining the scope of the FCRM.

Increasingly, CRS is investing in FCRMs at the country program level that are applicable across all projects and responses in the CP and that are sustained after the close of individual projects and activities. These CP-level FCRMs can offer greater efficiency in the use of budget and staff resources, and contribute to greater learning from the trends in programmatic feedback and complaints received. These mechanisms are often based on information and communications technologies for development (ICT4D), e.g., toll-free hotlines, but may also rely on more traditional channels, such as suggestion boxes or help desks open during office hours.

These CP-level FCRMs must be complemented by project-level channels appropriate to the context and the target population, such as listening sessions or help desks at distribution sites, to ensure that diverse members of the target community can access them. Consider the communication barriers that may be faced by specific groups (for example, women may have limited access to mobile phones, or minority groups may have lower literacy). Project-level channels should also build on the face-to-face communication opportunities present in project implementation.

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Tool 2: Context analysis checklist

Designed to assist teams to consider factors that may influence communication and engagement with program participants, such as local power dynamics, access to communication technology, and the experience and resources of CRS and our partners for community engagement or FCRMs.

CP-level
FCRMs must be
complemented
by project-level
channels
appropriate
to the context
and the target
population.

When in consortiums or partnerships, seek opportunities to establish joint FCRMs in which channels are shared by organizations, and the FCRM programmatic data are managed centrally or by different organizations. In joint FCRMs, clarify how data will be shared among organizations in a way that adheres to responsible data principles, confidentiality and organizational policies on safeguarding, as well as contributing to program quality and improvements. These need to be documented in agreements or MoUs, and updated if challenges or opportunities for greater efficiency arise.

In many contexts, there is an opportunity to build the FCRM on existing community structures managed by a local leader, community structure, or advisory group that has been trained to collect, document and respond to feedback and complaints. Community members may only want to give feedback to a trusted elder, priest, village chief or community-based organization. Such an existing and trusted channel can complement other FCRMs. When incorporating these structures into the FCRM, teams must be sure to maintain close communication with the community. If there is a concern that not all community members will be able to access the existing mechanisms, complement these with other project-level channels. Table 3 below offers key considerations and features of CP- and project-level FCRM channels, and what to consider when determining the scope of the FCRM.

If there is a concern that not all community members will be able to access the existing mechanisms, complement these with other project-level channels.

Confidentiality

An ethical principle that restricts access to and dissemination of information. It helps create an environment in which witnesses are more willing to recount their versions of events, and builds trust in the system and the organization.

^{7.} See <u>IASC Best Practice Guide Inter-Agency Community-Based Complaints Mechanisms</u>, <u>2016</u> for examples and guidance on shared feedback and complaints mechanisms.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVEN SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS ENVIRONMENT COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

Table 3. Scope of FCRM and comparative advantages

Country program FCRMs

Shared by projects and responses within the CP and exist beyond the project cycle.

Advantages

- Support CRS Safeguarding Policy by ensuring a channel is available beyond the life of any individual project.
 Program participants can face risks and barriers to reporting issues with staff and programs, and may feel safer complaining when a project has ended.
- Provide an opportunity to gather and identify broad feedback trends across projects that can be used for future program and strategy review and development.
- In the event of a prapid-onset emergency in the country, an existing CP-level FCRM can provide immediate access to a channel and guarantee some level of accountability early in the response before project-specific channels are in place.
- Can build on successes and address challenges with project-level FCRMs if expanding existing mechanisms for wider scope.

Disadvantages

- May not be equally accessible in all communities due to geographic or technological barriers or diverse communication needs, barriers and preferences in different areas of the country.
- Requires additional staff outside of project teams.
- May require significant financial investment if a call center model is used.

Project FCRMs

Used by individual projects and tied to project timelines.

Advantages

- Can be based on the local communication preferences of diverse groups within the target community to facilitate feedback and complaints, and overcome communication barriers (e.g., literacy level, language, lack of mobile phone coverage).
- Can be embedded into project activities, such as help desks at distributions and suggestion boxes at community meetings.
- Face-to-face channels are more easily applied at the project level and are often preferred by community members.

Disadvantages

- Without a well-integrated data management system, may not contribute to an understanding of wider trends in feedback.
- Does not provide opportunity for sensitive complaints and feedback outside of the project timeframe
- May lead to duplication of FCRM activities across projects and miss opportunities for greater efficiency and consolidation within the country program.

Partner-led FCRMs

May build on existing partner FCRMs or be created from scratch with the intention that partner organizations will sustain them beyond the life of a project.

Advantages

- Contribute to local leadership and sustainability commitments when handed over after project close-out.
- Prioritize and invest in strengthening institutional and individual capacity in FCRMs.
- Provide greater efficiency in building on existing structures and systems.

Disadvantages

- May require the merging of different organizational requirements and safeguarding policies.
- May depend on an assessment of the effectiveness of existing FCRMs and a commitment to address any gaps in the current systems.

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Joint FCRMs

Can be set up with consortia members and peer organizations to share roles and responsibilities for feedback and complaints collection, analysis, response, and agency-specific or collective action.

Advantages

- Community members have fewer channels to navigate when communicating with aid providers.
- Can promote cost sharing and greater resource efficiency.
- Offer the opportunity to gather broader feedback trends, determine further support needs outside of existing program/response and enhance greater coordination among organizations.

Disadvantages

- Require strong partnerships and coordination.
- Require initial and ongoing resource investment and management, which need to be articulated in budgets and work plans.
- Require clear data management and data-sharing protocols to ensure timely referrals of all relevant feedback and complaints to each organization.
- Require assurances of confidentiality in handling sensitive complaints.
- May need to be complemented by CRS-specific channels to ensure access for all community members.

Community-based FCRMs

Existing local mechanisms that communities or authorities establish and maintain to gather and refer questions, feedback and complaints to international and local humanitarian and development organizations.

Advantages

- Can reduce duplication and make the feedback and complaints process easier for community members, especially when there are multiple organizations and service providers.
- Support, respect and invest in locally led systems, communal governance and FCRM sustainability.
- Do not require substantial financial investment on the part of CRS or our partners.

Disadvantages

- Community members may fear providing feedback through channels managed by local authorities.
- Require a careful analysis of power dynamics, i.e. who is already using the mechanism, local perceptions of it, trust in the system, and how CRS can best support this local process.
- May mean little control over information-sharing and response timeframes.
- May not be sufficient to meet CRS' accountability, safeguarding and protection mainstreaming commitments.
- FCRM staff need to remain in regular communication with representatives of this complementary local mechanism to ensure a regular flow of information and accurate information sharing.

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Step 2. Conduct context analysis

Local context should always be considered in FCRM design decisions even when adopting or adapting existing systems. People are more likely to use some channels than others, and thus teams need to understand the communication barriers and preferences across different groups, for safely sharing types of feedback and complaints. Preferences and barriers may differ for rural and urban settings, in emergencies and protracted displacement, and across cultures, ages and genders. Barriers to communication and participation can be logistical, financial, technological, physical, psychological or cultural. Common barriers include language, literacy level, limited or no digital literacy or access, and perceived lack of trust and safety of the selected communication channels. Channels that are grounded in the local communication landscape and preferences will be more accessible and relevant to program participants and the wider community.

Barriers to communication and participation can be logistical, financial, technological, physical, psychological or cultural.

To understand local preferences and barriers, teams should conduct analyses of the communication context using primary data, as well as secondary data on literacy levels, power dynamics and digital access found in reports from peer organizations, data collected by previous programs, and local knowledge of staff and partners. Existing information should always be complemented with primary data collection during community consultations to ensure vulnerable groups are represented in FCRM design and that the selected FCRM channels will be appropriate, safe and accessible for all program participants and the wider community, regardless of gender, age or other relevant diversity factors.⁸



Design FCRMs to be responsive to community communication needs, barriers, perceived risks and preferences by reviewing existing data and conducting staff interviews and inclusive community consultations.

Community communication preferences and potential barriers and risks to communication channels are particularly important because, due to power dynamics, marginalized and vulnerable groups may have significant barriers to accessing information about services, providing feedback or making complaints. The mapping of power dynamics during project design (i.e., access to resources and decision-making in the community and household) which can include questions about safety, dignity and access for different groups—disaggregated by sex, age, disability and any other relevant diversity factor—will be directly relevant to FCRM design decisions.

^{8.} For example, certain marginalized groups may face additional barriers to accessing feedback channels, such as lower literacy or economic barriers to mobile phone ownership.

To determine communication needs, preferences and barriers, begin by reviewing existing data and FCRMs and talking to staff with local experience. The community consultation will complement these steps by filling in any gaps in understanding and include the voices of different community groups in FCRM design. Use — Tool 2: Context analysis checklist to structure data review, staff interviews and community consultations, and to document communication preferences and risks for key groups within the community.

Community consultation tips

CHANNELS

- Add questions on community preferences and barriers into needs assessment tools or integrate the consultation with other existing data collection processes.
- Always ask diverse groups about their preferred communication channels for programmatic issues and for issues on staff conduct.
- If previous programs have been implemented in the same area, ask about the effectiveness and appropriateness of existing or recently used channels in the FCRM.
- Remember to check assumptions: communication barriers are highly context-dependent, will be different for different groups within the target community, and can change over time.

Step 3. Select feedback channels

The selection of feedback, complaints and response channels should optimize access and use, and be based on the initial scoping decisions for the FCRM and the community consultation findings. FCRM channels are one means by which local people can raise issues important to them and communicate suggestions, appreciation, questions, concerns and grievances that may not be documented through other MEAL methods. Therefore, it is critical to select channels that are accessible to different groups, safe to use, and capable of providing a timely response. Work with protection and safeguarding colleagues to ensure that program participants and community members, especially the most vulnerable, are able to provide feedback and make complaints in a safe, dignified and confidential manner.

In most contexts, multiple channels will be required to effectively request and respond to the range of potential feedback and complaints (see Tool 1: Feedback and complaints categories). To be safe and accessible for all community members, it is recommended that FCRMs have these three types of feedback and complaints channels in place: Face-to-face, static and active channels.

Ensure that program participants and community members, especially the most vulnerable, are able to provide feedback and make complaints in a safe, dignified and confidential manner.

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Three essential feedback channels



A face-to-face channel

Uses planned project activities and interactions to support regular, intentional and meaningful communication between program staff and diverse community members. These channels may be help desks, community meetings or simply additional time dedicated to communication during field visits.



A static channel

(such as a hotline or suggestion box) Enables anonymous submission of feedback and complaints.

An active channel

Seeks feedback and complaints from community members during MEAL activities, such post-distribution monitoring, focus groups or household surveys.

FCRMs should also include multiple response channels to respond to a range of feedback and complaints, and meet commitments to confidentiality and anonymity, when needed. While the response channels should primarily reflect community needs, barriers and preferences, it is recommended that FCRMs also incorporate:

- An individual response channel to respond to both programmatic and sensitive complaints. Individual responses may be made using the same feedback or complaint channel, e.g. hotlines, based on the individual's preferred contact preferences and availability of contact information.
- A community response channel to respond to programmatic feedback and complaints, particularly when speaking to larger trends in feedback or planned actions to address the feedback received. These are usually community meetings, radio announcements and signboards.

Once channels have been selected, document the selection in the SMILER+ FCRM planning worksheet template along with subsequent decisions on staffing and resource allocation (see Step 4). In addition to a short description of the channel, the worksheet captures channel access and availability, anticipated access limitations and how they may be addressed, linkages to other channels or projects, and ICT4D needs. Teams should also include initial plans for FCRM close-out, handover or other sustainability planning in the template.

SELECT CHANNELS

Select feedback, complaints and response channels that provide meaningful, dignified and safe access for community members.

Using the findings from Tool 2: Context analysis checklist, teams should select channels that are safe and accessible for all program participants, with particular emphasis on the safety and access of women, girls, people with disabilities and any other marginalized group, particularly in reporting sensitive complaints and safeguarding allegations. Multiple channels are needed as community members may choose face-to-face channels to provide feedback and complaints to staff about ongoing projects activities, while also having the option to raise sensitive concerns anonymously. ICT4D channels should be considered, but they may give preferential access to men and boys in some contexts. Women and girls often have less access to technology, such as mobile phones and internet-based applications, and would thus require an additional channel, such as a female community representative, for safe and confidential reporting.

Response channels should also be varied and consider the communication preferences, needs and barriers of different program participants. Some responses can be integrated into existing communication plans and efforts, and shared broadly with all program participants when issues raised relate to targeting criteria, the scope and scale of the program, and the mission of the organization. Other responses will be made individually, for example, when an individual requests specific support or makes a complaint. Use

Tool 3: FCRM channels pros and cons to inform the selection of channels based on the local context and target audience.



Presents the advantages and disadvantages of common channels for FCRMs and is intended to support teams in the initial selection of FCRM channels during design, and then to tailor these channels to the local context and target audience during start-up and implementation.

^{9.} The CRS SMILER+ approach for MEAL system development includes a session on operationalizing initial FCRM design decisions during project start-up. The SMILER+ workshop planning tool documents these initial design decisions. See the <u>SMILER+ Guide</u> and <u>SMILER+ Process Map</u> for more information.

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Assessing the appropriateness of ICT4D channels

In most contexts, the use of ICT4D in FCRMs will enhance efficiency in communications for certain groups within the population. Where ICT is not accessible by all groups within target communities, these channels must be complemented by accessible and appropriate alternatives. When selecting among ICT4D options, the cost analysis should include both initial setup and routine maintenance costs as well as fees charged by telecommunications providers. Teams should look at whether they can rely on in-house expertise or need to outsource the design and management of channels to local technology and communication firms, e.g., a privately run call center. Decisions on ICT4D channels managed in-house or outsourced should consider costs, data protection, privacy and confidentiality. Also, it is important to understand host country regulations and requirements for telecommunication use for public messaging and data collection as these may be restrictive legally and financially.

Include static and active FCRM channels that support face-to-face and anonymous communication.

Industry experience has shown that both *active* and *static* channels are needed in an FCRM to ensure equal contribution to safeguarding and adaptive program management practices. CRS and our peer organizations' experience has found active channels to be a prime source of feedback on how programming can be improved and to inform adaptive management. Static channels support safeguarding commitments by offering anonymous and confidential complaint submission options, and are therefore essential. To balance static and active channels, teams can build active feedback collection into ongoing project monitoring processes by including questions on satisfaction levels and feedback in post-distribution monitoring, and planning for brief listening and feedback sessions at the end of structured data collection visits. Some channels can be both active and static depending on how they are set up. For example, a hotline or call center can receive calls, and can also call program participants to ask for feedback and suggestions for improvement.

Hold discussions with project and MEAL staff to review the gathered data on communication preferences and to assess all available options for balancing both static and active channels in the FCRM.

Include active FCRM channels in data flow map

When integrating FCRMs into existing monitoring tools and processes, include the active FCRM channels in the MEAL system's data flow map to support appropriate planning for data analysis and use.

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Table 4: Active and static channels

Active channels solicit feedback and complaints from a selection of program participants and other community members by using surveys, focus group discussions, listening sessions, community meetings, and interviews with individuals, etc.

Static channels are made available so that **all** community members and program participants can communicate at a time that suits them and on the subject they choose.

In active channels, teams choose the people from whom to gather feedback, determine the timing of information collection, and often determine the questions to ask. Active channels—such as focus group discussions, post-distribution monitoring and listening sessionsoffer an opportunity for listening and constructive dialogue. Many active channels are, by design, face-to-face channels, which allow staff to provide immediate responses to questions when possible. Open-ended questions added to monitoring surveys are also helpful because they encourage unstructured conversation and invite respondents to share ideas on what is important to them.

Examples of static channels include suggestion boxes, hotlines, dedicated email addresses, text messages and scheduled help desks. Some of these channels are face-to-face (e.g., help desks) and some can be set up to ensure confidentiality and anonymity (e.g., hotlines and suggestion boxes), which is important for raising sensitive complaints. While an ICT4D channel is often an appropriate option for anonymous complaints, no FCRM should rely solely on digital options as these often exclude already-marginalized people due to lack of literacy, limited digital literacy, or limited access to technology.

Step 4. Allocate sufficient resources

Effective FCRMs require adequate staff time and resources as well as strong communication with communities and other stakeholders. The cost of implementing an effective FCRM includes hardware and software for the chosen channels, transportation for community engagement visits, and communication materials. Given the time required to collect, analyze and respond to feedback and complaints efficiently and to the satisfaction of community members, staff time is often the most significant cost. Overall, FCRM costs will depend on the channels selected, the scope and scale of the FCRM, and the level of collaboration with other organizations and stakeholders in FCRM processes.

Staff time is often the most significant cost.

DETERMINE CONTEXT SELECT

Support responsible close-out

Planning for the close-out of an FCRM during the design phase is important in order to facilitate handover to partners, local government or community committees. To support a responsible close-out:

- Develop resource-sharing agreements and plans for institutional and individual capacity strengthening throughout FCRM implementation.
- Allocate the necessary resources—budgetary and human—for institutional systems strengthening throughout the project.
- Create a timeline of key handover or close-out steps, to be reviewed and adapted as needed as close-out approaches.

Equip the FCRM with robust staffing structures.

To ensure sufficient allocation of resources and staff for FCRMs, teams should integrate FCRM design, start-up and implementation costs into project proposals (See Tool 4: Boilerplate language for FCRM in program proposals) • At this stage, teams will determine what staffing is required to implement the FCRM and consider any budgetary implications. Document key roles for MEAL and program staff for each FCRM channel in the SMILER+ FCRM planning worksheet template • R.

Ensuring sufficient budget

For CP-level FCRMs, a key part of the budgeting process is to secure leadership sign-off for sufficient FCRM budget to cover FCRM implementation, staffing and training needs, by ensuring sufficient donor and CP funds are available and allocated.



Tool 4: Boilerplate language for FCRM in program proposals 0—n

Click here to use Tool 4 to inform your FCRM proposal narrative/ annexes. This tool is framed around BHA guidance (April 2021) so is particularly useful for BHA applications. It should be adapted to specific project contexts and aligned with other donor requirements as needed.

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FCRMs require dedicated project management support and oversight to ensure an efficient flow of information, coordination between MEAL and program teams, and the accessibility and effectiveness of the system over time. Senior leadership create an enabling environment for FCRMs by resourcing a strong FCRM team, spanning MEAL and project teams. Experience from across the sector demonstrates that dedicated FCRM roles lead to a more effective and accountable system. As an FCRM operates across departments within the CP, it is recommended that one staff member be hired to oversee the FCRM and manage coordination between the program, MEAL and operations staff. See Table 5 below, for common responsibilities of this position. Should hiring a staff member not be possible due to limited resources, appoint an FCRM focal point to take on this role, ensuring at least a 50% level of effort in their job description.

Should hiring a staff member not be possible due to limited resources, appoint an FCRM focal point to take on this role, ensuring at least a 50% level of effort in their job description.

FCRM staffing tips

- Consider the diversity of staff collecting and receiving feedback and complaints. Ideally they should mirror the target community across age, ethnicity, religious and language groups, etc., to encourage trust and increase the likelihood participants will feel comfortable approaching the team with their concerns.
- ♦ Consider the complexity and number of the selected FCRM channels and the overall scope of the project (e.g., geographic coverage and population size) when determining the number of staff needed to receive, acknowledge, document and respond to feedback and complaints. Where ICT is not suitable or accessible, increase staffing numbers to facilitate sufficient face-to-face channels.
- Consider where a staff member may be able to hold several responsibilities, across channels, for example, recording and analyzing feedback may be managed by one MEAL officer across all channels for a project or several projects, depending on their scope and scale.
- ◆ Consider the skills, attitudes, competencies and behaviors required for all stages of FCRM implementation when selecting staff and positions. Use → Tool 5: FCRM skills and competencies list to reflect on the gaps in the CP's existing staffing structure and where capacity may need to be invested in or augmented.
- ◆ Document key roles for MEAL and program staff for each FCRM channel in the ◆ SMILER+ FCRM planning worksheet template ■.

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Tool 5: FCRM skills and competencies list

Articulates the key competencies, behaviors, attitudes and skills that support an effective FCRM. It can be adapted for recruitment interviews and performance reviews.

USE DATA IN DECISIONS

ASSESS EFFECTIVENESS

Table 5 below summarizes the roles and responsibilities across functions needed for an effective FCRM. Use it to reflect on current staffing levels and identify the skills, competencies and positions needed to manage the FCRM.

ENABLING INFORM ENVIRONMENT COMMUNITIES

Table 5. Designated FCRM roles and responsibilities

CONTEXT ANALYSIS SELECT CHANNELS

Program manager	MEAL staff	FCRM manager/ officer	Field and outreach teams
 Reviews secondary data to determine communication landscape Consults with communities on preferred channels 	Support data collection and analysis for community consultations	Oversees the FCRM process	Communicate the purpose of FCRMs to communities
 Selects appropriate FCRM channels Budgets for FCRM Allocates clear FCRM roles and responsibilities across team 	Establish data management platform	 Coordinates between program, MEAL, field teams, protection/ safeguarding/ accountability staff and leadership 	 Receive feedback Acknowledge feedback Document feedback Respond to feedback via individual and community channels
 Shares information on feedback channels and process with communities Receives feedback, particularly via face-to-face channels 	Receive feedback, particularly via active channels	 Develops the SOPs and updates them as needed Creates communication materials for FCRM 	
 Acknowledges feedback Responds to feedback, particularly via community channels 	 Acknowledge feedback Respond to feedback via individual channels Escalate sensitive complaints according to Safeguarding Policy 	Develops and conducts trainings on FCRMs	
Escalates sensitive complaints according to Safeguarding Policy	Enter and clean FCRM data as needed	Leads effectiveness checks and improvements of the system	
Checks that feedback channels are safe, accessible and being used across gender, age, disability and other diversity criteria	Manage FCRM data	Facilitates reflection on FCRM effectiveness checks and leads action planning	
 Facilitates reflection on FCRM data with stakeholders Adapts programs based on feedback and complaints received Integrates FCRM close-out or handover into larger project close-out phase 	 Analyze FCRM data Create visuals for FCRM data 		

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Increase transparency and trust by using staff outside the project

Consider assigning FCRM-handling responsibilities to staff outside of the project teams to increase transparency and trust in the system. This is increasingly important in high-risk contexts where community members may be more willing to report incidences of fraud or safeguarding to staff not directly associated with project implementation.

Integrate FCRM costs into country program and project budgets.

Effective FCRMs require investment beyond staffing. Some additional costs for FCRMs are direct line items related to the selected channels, data management processes, and costs for communication on FCRM (e.g., hardware, software, other technology, supplies, travel). See <u>Feedback</u> Starter Kit (IFRC 2019), Tool 15 for useful guidance on costs associated with feedback, complaints and response.

Common costs to consider include:11



Where feasible and appropriate, FCRM channels and systems can support multiple projects, and costs can be integrated across projects. For CP-level systems, costs can be integrated into the program support pooled costs. If donor restrictions or funding shortages remain, request use of unrestricted or discretionary and pooled funds, especially to cover ineligible costs.¹²

^{10.} Scroll down to "Toolkit Documents" and select Tool 15.

^{11.} Feedback Starter Kit (IFRC 2019).

^{12.} Given the increased focus on PSEA and safeguarding, some donors are more likely to allow for expanded FCRM practices that clearly meet these new requirements.

For project-level channels, embed feedback collection and response steps into project activity budgets, including costs of communication and community visits. Plan for sufficient resources for staff to appropriately follow up on programmatic feedback and complaints (e.g., facilitating group and individual interactions to better understand the nature and potential implications of issues raised through the FCRM). Where teams are new to FCRMs or are building on an existing system, include capacity development and technical assistance for FCRMs into MEAL and program budgets, including partner capacity strengthening needs as needed.

Tools to support key decisions at the project design stage:

- Tool 1: Feedback and complaints categories
- Tool 2: Context analysis checklist
- Tool 3: FCRM channels pros and cons
- Tool 4: Boilerplate language for FCRM in program proposals 0—
- Tool 5: FCRM skills and competencies list

Key resources

- Feedback Starter Kit (IFRC 2019), Tool 15
- SMILER+ FCRM planning worksheet template O-

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CHAPTER 2: START-UP



During start-up, teams operationalize key decisions that were made at the design stage through detailed planning, the development of FCRM materials, and orienting and training staff and communities. Teams should clarify the roles and responsibilities of FCRM implementation teams, map external service providers, develop referral pathways for feedback and complaints, and determine data management systems and protocols. These processes are often conducted in parallel and may be iterative.

The FCRM start-up process is supported by mapping FCRM flow during SMILER+ workshops and the development of standard operating procedures that document the protocol and processes associated with each phase of FCRM implementation.

By the end of the start-up phase, teams should have:

- Completed a SMILER+ FCRM flowchart to map the flow of data and communication through the system.
- ✓ Developed SOPs for the FCRM protocols and processes.
- Clarified roles and responsibilities for the FCRM among MEAL and program staff and senior leadership.
- Mapped external service providers and developed a referral pathway.
- ✓ Communicated to communities the scope and purpose of and access to the FCRM.
- Trained staff and volunteers on their roles and responsibilities in FCRM implementation.

ESTABLISH

Step 5. Establish FCRM channels and procedures

During start-up, program staff will establish FCRMs and document in the standard operating procedures the protocols and procedures associated with each channel and overall processes, such as collection, acknowledgement, data management, response and referral (see === 6: FCRM standard operating procedures template). The SOPs will also include a range of templates and tools for documenting and processing feedback, such as the FCRM registry and templates for submitting feedback or complaints via each channel (see Tool 7: Establishing a feedback and complaints registry). It is important that the SOPs capture specific FCRM roles and responsibilities and data management decisions, and are kept up to date as the FCRM evolves and improves. Refer to Tool 3: FCRM channel pros and cons for key considerations when tailoring selected channels to the local context and target audience.

Feedback and complaints registry

A feedback and complaints registry documents, stores and tracks feedback data by:

- Categorizing and analyzing incoming FCRM data
- Sorting feedback data
- Tracking progress and changes in feedback, complaints and information needs
- Tracking responses to feedback
- Tracking satisfaction with the FCRM and perceptions of CRS and partner responsiveness, etc.



Tool 6: FCRM standard operating procedures template

Supports teams to develop standard operating procedures for FCRM implementation in their operating context.



Tool 7: Establishing a feedback and complaints registry

Identifies the data fields needed in a registry for an FCRM and should be used during the development of the FCRM data management system.



Quality standard: Embed FCRMs in MEAL and project management processes.

An effective FCRM requires integration with strong project management practices and quality MEAL systems. Project management practices will ensure the FCRM is implemented as planned and that any gaps or challenges are addressed as they arise. Integration with MEAL processes will make programmatic FCRM data accessible to project management teams during ongoing data use and adaptive management opportunities. Teams can articulate these linkages in the SMILER+ FCRM flowchart and SOPs.

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SMILER+ and FCRM

The SMILER+ workshop operationalizes initial FCRM design decisions as documented in the SMILER+ FCRM planning worksheet template O—I. During the workshop, project teams refer to initial design decisions to map the flow of feedback, complaints and required actions, ensuring that these adhere to the Safeguarding Policy and support adaptive management practices.

SMILER+

The CRS SMILER+ approach to MEAL system development includes the operationalization of FCRM design decisions during project start-up. SMILER+ provides tools and templates to document design decisions and map the flow of data and communication through the FCRM. For more information on SMILER+, refer to the SMILER+ process map and the SMILER+ guide.

The SMILER+ FCRM flowchart documents the frequency and timing of information flow as well as persons responsible for each step. The flowchart provides an opportunity for staff, including field staff, to ensure the process will meet timeline commitments for response, escalation and referral, as well as to reallocate roles for greater efficiency if needed. The specifics of the FCRM can then be included in the project's detailed implementation plan (DIP) to garner strong project management support. During the SMILER+ workshop, teams will also identify support and resources needed to fulfill FCRM roles and responsibilities.

Following the flowchart session, teams draft the tools for documenting feedback and complaints in both static and active channels. Tool 8: Feedback and complaints collection form provides an example that teams can adapt to a given channel and context. These tools should include a script for seeking consent, and feedback and complaints, as well as capture the key demographics needed to track trends in FCRM usage. Teams should plan to field test and translate tools after the workshop.



Tool 8: Feedback and complaints collection form

Identifies key information to be documented through a face-to-face FCRM channel and should be adapted to the project context as needed.

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Suggested content for collecting consent

This form collects personal information that can identify you, including your name, age, location, and phone number. This information allows us to reach you for further clarifications and to resolve the issue. Your personal information will remain confidential and will only be shared if it is absolutely necessary. You do not need to provide this information if you do not wish to, and you will still be able to give us your feedback. However, if you choose not to share your personal information, we will not have any way to contact you directly for further clarification on your feedback. Do you agree to share your personal information with the appropriate CRS or partner team member to help us better resolve your feedback?¹³

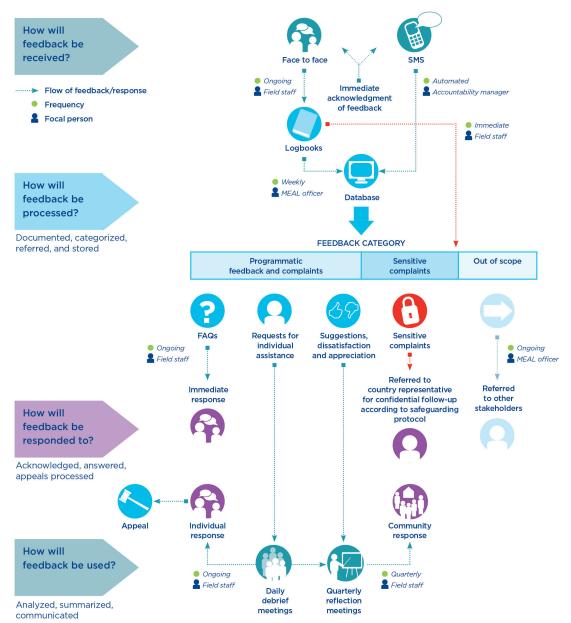
FCRM as part of a stakeholder communication plan

The SMILER+ workshop also includes development of a SMILER+ stakeholder communication plan that identifies key information needs, including those associated with FCRMs, and approaches to meet them (see Tool 9: Checklist of information to share with communities for a list of common FCRM information needs for community members and other stakeholders).

^{13.} This language for seeking consent was used by the CRS Nepal team, and teams can adapt it to the local context.

DETERMINE CONTEXT SELECT ALLOCATE **ESTABLISH** ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

FCRM flowchart



Standard operating procedures

Following the SMILER+ workshop, project teams develop standard operating procedures with detailed protocols to guide the operation of the FCRM and serve as a reference point for all staff supporting FCRM functions. When developing the SOPs, teams should refer to Tool 1: Feedback and complaints categories, completed SMILER+ FCRM planning worksheet template and SMILER+ FCRM flowchart, donor and agency policies and the proposal narrative related to the FCRM. The key SOP content is described below. It is important that the SOPs are updated as the FCRM evolves during implementation and upon close-out so they serve as a reference during implementation and close-out as well as for other teams in the FCRM design phase. An SOPs template is included in Tool 6.

Key standard operating procedures content:

- Project background
- FCRM requirements overview
- FCRM staffing structure and roles and responsibilities
- Description of each feedback, complaints and response channel
- Sensitive complaints escalation protocol
- Appeals process
- Communication plan for FCRM information
- FCRM data management plan and data registry
- Plans for data analysis and use
- Plans for FCRM effectiveness checks
- Plans for FCRM close-out
- Data collection form(s)

Tools

- Tool 1: Feedback and complaints categories
- Tool 6: FCRM standard operating procedures template
- 📜 Tool 8: Feedback and complaints collection form
- Tool 10: FCRM roles and responsibilities table

Appeals process

Program participants who have expressed dissatisfaction through one of the FCRM channels can escalate their concerns if they deem the response unsatisfactory. The appeals process checks whether the initial decision or response was appropriate and re-examines the process already followed to determine whether the original decision should be upheld or escalated to designated staff (e.g., head of programming, country representative, accountability manager etc.). The appeals process should be led by staff who were not involved in responding to the original complaint.



Map external service providers and establish a referral process for protection concerns and out-of-scope issues.

The FCRM may receive feedback and complaints related to other actors or organizations or to protection concerns (see FCRM *Category 7: Other protection issues* for a full description). These complaints may require protection services, such as support for survivors of gender-based violence or unaccompanied children. In programs where CRS is not a specialist protection actor, our role should be limited to providing information on how to access appropriate services to anyone disclosing a protection need.

In programs
where CRS is
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anyone disclosing
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need.

Teams should immediately refer individuals to other actors providing protection services, if available. In the absence of information on available services, teams should request individual contact information for follow up, and request consent to contact the individual later on available services. Team members can then forward the issues to the program manager (copying the HoP/emergency coordinator), requesting their support to access referral information, maintaining strict confidentiality in documentation and communications. To facilitate this process, it is important that teams know what services are provided by other actors in their area of operation, so that people with protection issues can be given accurate and up-to-date information on available services, and out-of-scope issues can be passed on to the relevant actor. Teams should map protection service providers in the local area to respond to protection needs that are encountered through the FCRM system. Teams should also be aware of and document all other relevant service providers, to refer out-of-scope issues, as needed.

It is important that teams know what protection services are provided by other actors in their area of operation.

Developing a referral pathway

Mapping protection actors and services: This is a process in which all relevant protection actors—government, NGOs and community-based and other civil society organizations—in a given area are identified, and the protection services they provide are documented to provide a clear picture of the protection environment. In some humanitarian contexts, this mapping is done through the Protection Cluster and can include service providers across sectors. In development contexts, the government may conduct this exercise. Where up-to-date mapping already exists, program teams can use it to inform a referrals procedure. Where mapping does not already exist, teams are advised to gather this information, ideally with the support of a protection actor in the local context.

Documenting a referral pathway: After mapping protection actors, teams can use the information gathered to develop and document a referral pathway. This is a document that guides NGOs and program participants on how to access essential protection services, i.e., where to go and who to contact to seek assistance for a specific protection need, such as legal assistance, healthcare and child protection services. This information can then be shared widely and as needed with program participants as protection needs arise or come to staff's attention through more general programming. See here for an example of a referral pathway for the Rohingya response in Cox's Bazar, Bangladesh.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIV

First assess whether there is an existing pathway that can be used in our programming. If one does not exist, or does not exist in the area of operation, follow the steps for <u>Developing a referral path for essential protection services</u>. This resource includes guidance on how to map protection actors and document a referral pathway. Remember to update or add to the mapping and pathway over time. Include the referral pathway as an annex to the SOPs, and ensure a copy is shared with each staff member who may receive feedback or engage with program participants in the course of their work.

Out-of-scope issues: Include a mapping of other humanitarian and development actors, their services and contact details in the SOPs. Where feedback or complaints relate to the work of another organization (see FCRM *Category 9: Out-of-scope feedback* for a full description), teams can refer this information to the relevant actor, only providing identifiable information with the informed consent of the person providing the feedback or complaint. Where referral is not possible, inform the feedback provider that the request falls outside of the project's scope. Teams should refer to the actions in the FCRM categories table to determine appropriate referral steps in the project context.

Protection referral

A protection referral involves referring at-risk or vulnerable individuals to the appropriate protection actors identified during the protection mapping. This is done either by forwarding basic information on specific incidents with the informed consent of the person affected or directing the affected person to available services. In humanitarian contexts, the referral process is often limited to provision of information on available protection and basic needs services. In some development contexts, where CRS has the relevant protection and case management expertise, a more formal referral process may be undertaken, where trained staff accompany people with protection needs throughout the referrals process, ensuring that they receive the required service and can access any further recommended services. This approach should not be taken without specific case management and protection expertise.

The safest response when someone discloses a protection incident is to listen non-judgmentally and provide information on available services. This will ensure survivor-centered support is prioritized, as well as support for staff to maintain professional boundaries to keep themselves safe.

^{14.} Protection Guidance Manual (World Food Programme 2016).

DESIGN START-OP IMPLEMENTATION CLOSE-001

When referring protection concerns, remember to:

- Let the survivor choose whether they wish to access these services or not.
- Provide a listening ear, free of judgment.
- Treat any information shared with confidentiality.
- If you need to seek advice and guidance on how to best support a survivor, ask for the survivor's permission to talk to a specialist or colleague. Then do so without revealing the personal identifiers of the survivor.¹⁵



Develop FCRM data management systems and protocols to protect the dignity and confidentiality of people who provide feedback and complaints.

Good FCRM data management practices will ensure that feedback and complaints are categorized, managed and responded to in an appropriate and timely manner. The data management system will denote which feedback and complaints are *open* and which are *closed* so that program managers can follow up on any outstanding cases. FCRM data management practices must respect the confidentiality of community members and ensure that only appropriate staff have access to personally identifiable information related to sensitive complaints or protection issues. Emphasize data protection and confidentiality in training for all staff who interact with sensitive and programmatic data within the system.

Open feedback

A question, feedback or complaint that has not yet been responded to or resolved. Acknowledging it but not providing a full response means it is still open.

Closed feedback

A question, feedback or complaint to which a response has been provided (the response does not have to be satisfactory to the provider) or referred and/or action taken to resolve the complaint.

^{15.} Humanitarian protection handbook (Trocaire 2014) and GBV pocket guide (IASC 2015).

Software can greatly improve our efficiency in handling and responding to feedback and complaints. Below is an overview of key considerations associated with common software options.

- Microsoft Excel This is an easily accessible spreadsheet that most staff and partners will have experience using for other project management activities. However, it offers little data protection as staff may share files, and requires manual data entry for updating and cleaning.
- CommCare This data collection tool can be used online and offline. It integrates with YouTrack, Power BI and other case management and/or reporting software.
- YouTrack This case management tool is particularly advantageous for CP-level FCRMs, allowing teams to tailor staff access and views depending on their needs (e.g., sensitive versus non-sensitive, vulnerability, project type, etc.). YouTrack automation will help ensure that feedback and complaints are within the teams' response timeline by sending alerts of any delays.

When selecting tools and software for the FCRM data management system, teams should consider the budget, available human resources and staff capacity, as well as previous experience in the management of sensitive and personally identifiable information. Contact the project's ICT4D focal point to determine the most appropriate technologies to support FCRM data management systems.¹⁶

Anonymous feedback and complaints are welcomed

Inform community members that sharing personally identifiable information is optional and that anonymous feedback and complaints are also welcomed. Explain that the benefit of sharing PII is that it will allow staff to follow up directly with the individual. Also outline the practices in place to protect the confidentiality of all data to ensure the individual makes an informed decision. Refer to the <u>CRS Guidelines for De-identifying Data</u> O-a for additional information.

Personally identifiable information

Personal information, written or recorded, that singly or in combination could be used to identify a specific individual.

^{16.} If the ICT4D focal point is not available, please submit a support ticket to GKIM for assistance here.

Good practices for FCRM data management



Set up consolidated data management system

For CP-level FCRM, establish a consolidated data management system to document and track the feedback and complaints received by all projects while ensuring FCRM data can easily be summarized and accessed by individual projects as needed.

Tips for data management system

- Build the FCRM categories 1 to 9 into the structure of the data management system (Tool 1: Feedback and complaints categories).
- Develop an unique identifier in the system for each feedback item or complaint received. This is a series of digits, or letters and digits, that follow a defined sequence that can be generated automatically by the system. It allows staff to identify and manage a case using the identifier, which does not reveal personally identifiable information.
- Create fields to:
 - Track the status of each feedback item or complaint as "open" or "closed."
 - Denote referral of protection issues or out-of-scope feedback and complaints.
 - Document that consent or assent was given when sharing any PII as part of the feedback process.



Explain confidential versus anonymous feedback

Communicate the difference between confidential and anonymous feedback and complaints to communities so they can make informed decisions about sharing personally identifiable information to enable follow-up as needed.



Seek consent

Collect consent or assent* from community members who chose to share PII when providing feedback or complaints.



Ensure escalation procedure

Ensure the system (and associated protocols) appropriately escalate sensitive complaints to the CR or designate in line with the CRS Safeguarding Policy



Limit access to information

Limit access to personally identifiable information in the data management systems and specify roles associated with access among CRS and partner organizations.



Never store in hard copy

Never store PII associated with feedback or complaints in hard copy or divulge PII in emails.

^{*}Assent is given by children under 18 years (or legal age).

ESIGN START-UP IMPLEMENTATION CLOSE-OUT

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH **ENABLING** INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS **ENVIRONMENT** COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

Step 6. Create an enabling environment

An effective FCRM requires the clear and appropriate allocation of roles and responsibilities as well as a generous investment of time and resources to cultivate an organizational culture that fosters the necessary behaviors, attitudes and competencies of staff and senior leadership. Without this level of organizational support, FCRMs can be negatively impacted by inefficiency, a lack of trust, or risks to staff or to community members sharing feedback and complaints.

Clarify roles and responsibilities for FCRM implementation among program and MEAL staff.

Teams can clarify FCRM roles and responsibilities across project and MEAL teams by determining how feedback and complaints will be requested, acknowledged, documented, referred, escalated, used in decision-making and responded to. Teams should refer to the Safeguarding Policy to determine steps for handling sensitive feedback and adhering to CRS confidentiality commitments. Refer to the guidance in the box below when allocating FCRM roles and responsibilities among project and MEAL teams, technical advisors and senior leadership.

Although an FCRM is a cross-operational endeavor, ultimately, it is a programmatic responsibility, and a means to enhance the safety, access and dignity of program participants. While senior leadership, MEAL staff and FCRM managers have important roles to play, program managers are responsible for ensuring that:

- FCRMs are safe and appropriate in the context and for target audience.
- Diverse program participants are aware of how to give feedback and complain.
- Feedback is responded to and used to adapt programs accordingly.

Refer to the roles and responsibilities in the SMILER+ FCRM planning worksheet template — developed during design and the SMILER+ FCRM flowchart developed during SMILER+ to identify the key roles associated with the FCRM channels and protocols. Complete — Tool 10: FCRM roles and responsibilities table and include this as an annex in the SOPs.



Tool 10: FCRM roles and responsibilities

Documents the key tasks and sub-tasks for MEAL and program staff associated with implementation of an FCRM.

Cultivate an

organizational

CONTEXT SELECT ALLOCATE ESTABLISH **ENABLING** INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE ANALYSIS CHANNELS RESOURCES CHANNELS **ENVIRONMENT** COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

Roles and responsibilities

Country representatives (CRs) have the overall responsibility of ensuring the FCRM is in place and functional for all programming needs. They are also responsible for handling sensitive complaints in line with the Safeguarding Policy. They can champion the use of FCRM data by requesting trends in feedback and complaints and response rates on an ongoing basis, supporting adaptive management based on programmatic feedback received.

Heads of programming (HoPs) support quality FCRMs by allocating sufficient staff time for FCRM implementation, ensuring staff have appropriate training and competencies for FCRMs, including FCRM responsibilities in staff job descriptions and performance planning, and requesting trends in feedback and complaints and response rates. In addition, HoPs foster an environment in which staff are encouraged to speak openly, question assumptions, and use data in ongoing decisions and adaptive management practices.

Program managers (PMs) are responsible for ensuring that diverse community members have access to and trust FCRM channels by consulting individuals and communities on their preferred channels, and setting up and managing the implementation of the FCRM. They ensure responsiveness to feedback and complaints received, the use of feedback and complaints in ongoing decisions, and regular checks on the effectiveness of the FCRM. PMs may also directly receive, acknowledge, document and respond to feedback, particularly via community-level response channels. In addition, PMs should integrate key messages on the FCRM into ongoing project communication activities.

FCRM manager (or focal point) provides oversight of the whole FCRM process. They assume the wider responsibility for coordinating FCRMs within and across CP projects, and supporting individual project teams to operate and improve their FCRMs. They lead the development of SOPs, and develop and conduct trainings. They also lead the annual effectiveness check to learn about and improve the safety, accessibility, efficiency and impact of the FCRM.

Safeguarding focal points serve as a trusted channel for staff safeguarding reports and concerns. They receive, triage and escalate these, and can also help establish other channels to ensure confidentiality in reporting.

CONTEXT SELECT ALLOCATE ESTABLISH **ENABLING** INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

MEAL staff are responsible for operationalizing the initial FCRM design decisions, ensuring flow of programmatic feedback and complaints through the system, and analyzing and summarizing them. MEAL staff may also directly receive, acknowledge, document and respond to feedback, particular via active FCRM channels. MEAL staff participate in the annual FCRM effectiveness check and facilitate reflection on the findings to generate key recommendations for improvement.

ENVIRONMENT

Accountability/protection mainstreaming focal points, where they exist, support program managers to ensure channels are accessible, safe and used by all program participants, regardless of sex, gender, age, disability or other relevant diversity factor.

Field staff and outreach teams are primarily responsible for acknowledging, documenting and responding to feedback and complaints received through various channels as soon as possible. It is important that field staff and outreach teams demonstrate value by employing active listening skills and being open to various opinions, ideas and even criticisms of project activities. Field staff will need to recognize feedback or complaints shared as part of ongoing community engagement efforts and include these in the FCRM system.

ESIGN START-UP IMPLEMENTATION CLOSE-OUT

Communicate and demonstrate to all staff the purpose of the FCRM, and CRS commitments to accountability, program quality and safeguarding.

ENABLING ENVIRONMENT

Managers and leadership who support and model transparency and accountability principles will communicate to staff the value, purpose and function of FCRMs. These are the principles that staff are expected to uphold with community members. It is particularly important for program managers and leadership to demonstrate how feedback and complaints are used in decision-making and program improvement, because this fosters a culture of feedback and encourages staff to propose solutions to recurring programmatic challenges and engage in adaptive management. Here is a list of recommended practices to support a strong enabling environment for FCRMs:

- Refer to the FCRM information needs for program staff in the SMILER+ stakeholder communication plan to inform communication messages and activities. Integrate these into larger project launch approaches as feasible.
- Senior leadership regularly reaffirm the importance of FCRMs in communication with staff, partner organizations and program participants. This includes reminding staff about the value and purpose of the FCRM, and communicating highlights of programmatic feedback trends.
- Senior leadership demonstrate a culture of feedback and responsiveness by themselves requesting and responding to staff feedback. This can take the form of periodic staff surveys, office suggestion boxes, or open reflection and problem-solving sessions with staff and leadership engagement.
- Program managers regularly access feedback data and engage relevant program teams in discussions about necessary course corrections, programming adaptations and other changes that can improve programming based on feedback.
- Senior leadership determine and communicate to all staff, affiliates and partners the process for safely and confidentially escalating sensitive complaints involving alleged staff misconduct.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH **ENABLING** INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS **ENVIRONMENT** COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

To address or mitigate negative staff perceptions of FCRM, senior leadership can:

- Communicate clearly that feedback and complaints are welcome and are a key tool in doing our jobs well. Receiving reports of multiple issues means that the FCRM system is functioning and effective, and assists us in identifying and addressing the weaker aspects of our program, to improve program outcomes for participants.
- Ensure that staff know that negative feedback does not necessarily reflect badly on them individually; it is usually related to a broader issue. Acknowledge that it can nevertheless be difficult not to take negative feedback personally. Reassure staff that this is a normal reaction and give them time to process and reflect on the issue.
- Ensure staff managing and receiving feedback have sufficient support. Defensiveness to feedback may indicate issues around work-life balance or well-being. Ensure breaks and leave are being taken, and rotate roles across the team, as needed.

When training staff on FCRMs, illustrate how it integrates with concepts of accountability, safeguarding, protection mainstreaming and adaptive management, and orient them to the specific functions of the FCRM and their associated roles. Integrate the following recommendations in developing the training plan:

- Present the SMILER+ FCRM flowchart developed during SMILER+, highlighting the roles and responsibilities associated with each step in the FCRM process.
- Include an exercise in which each training participant is assigned an item of feedback or a complaint, and must navigate the channels as if they were a project participant or other community member. This will illustrate the likely challenges and barriers faced, especially by the most vulnerable.
- Integrate the FCRM training with a larger overview of safeguarding if participants have not recently had an orientation (or refresher) on safeguarding.
- Organize an exercise in which participants must sort examples of feedback and complaints into the standard CRS categories so they become familiar with the range of examples in each.
- Emphasize that staff should maintain confidentiality of all sensitive feedback and complaints, defaulting to sensitive categories if they are unsure where to place them.
- Reinforce the importance of data protection and how it applies to FCRM data
- Explain the process for escalating sensitive complaints in the country program according to the Safeguarding Policy.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH **ENABLING** INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVIS SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS **ENVIRONMENT** COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA



In successful FCRMs, roles and responsibilities are included in job descriptions and supported in development and performance plans. Teams should seek and hire new staff with strong listening and facilitation skills, and cultivate these skills among existing staff (refer to Tool 5: FCRM skills and competencies list). To identify and foster these skills and competencies, it is recommended to:

- Use the scenario-based interview questions in ☐ Tool 11: Interview questions for FCRM positions during the hiring process to identify staff that prioritize a range of voices and perspectives, and are committed to accountability to affected people in programming.
- To identify gaps, reflect on existing staff capacities as listed in Tool 5: FCRM skills and competencies list. Develop plans to improve capacities and skills among staff and partners as part of ongoing staff development.
- Offer trainings or refreshers on safeguarding and protection mainstreaming to MEAL and program teams, and senior leadership.
- Offer trainings or refreshers on CRS Responsible Data Values and Principles to MEAL and program teams, as well as to senior leadership.

Prepare staff to foster feedback process

All field-based staff should understand how to gain and maintain people's trust, welcome their suggestions and comments, know how to respond to both positive and negative feedback, and observe how different community members react to the way services are provided.

CHS Guidance notes and indicators (CHS Alliance 2015).



Tool 11: Interview questions for FCRM positions

Contains examples of scenario-based and technical interview questions that can be used when recruiting for FCRM-related positions.

DESIGN START-UP IMPLEMENTATION CLOSE-OUT

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING **INFORM** REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVISCOPE ANALYSIS CHANNELS RESOURCES CHANNELS ENVIRONMENT **COMMUNITIES** FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

Step 7: Inform communities about the FCRM

For an FCRM to be successful, community members and other stakeholders must understand its purpose and processes as well as trust staff to listen and appropriately respond to their feedback and complaints. Without this, community members may choose not to use the FCRM or have unrealistic expectations about how feedback and complaints will be used and responded to. A list of key topics to communicate on FCRM, alongside the Code of Conduct and project information, is included in <u>Communicating with communities on PSEA</u>.

Code of conduct

A set of behavioral standards that staff and volunteers of an organization are obliged to adhere to.

Manage expectations

Managing expectations is important as communities may believe that the complaints process can solve all their problems. This can generate frustration and disappointment if the expected changes are outside the control of the agency. CHS Guidance notes and indicators (CHS Alliance 2015).



Communicate to diverse community members the role of the FCRM in upholding accountability and safeguarding principles in practice.

To support accountability to communities, communicate to all community members the purpose of the FCRM and how to access its channels during project start-up. Emphasize that the purpose of FCRMs is to uphold safeguarding commitments and to include community voices in project implementation decisions. Tool 9: Checklist of information to share with communities provides a complete list of communication messages, including those specific to FCRMs. Remember that all key messages on FCRM should be reinforced with frequent reminders during implementation, particularly when there are updates or changes in FCRM channel access or plans for response. In communication, highlight:

- The purpose of FCRMs
- The process for accessing all FCRM channels
- Distinctions between types of feedback and complaints
- The response timeline and process for feedback and complaints

Ensure that the communication methods are appropriate for the full range of community members, including those who may experience communication barriers, for example women and girls, people with disabilities, or other marginalized groups. Use a variety of methods to share information, to ensure wider reach.



Tool 9: Checklist of information to share with communities

Includes commonly requested information that can be shared with program participants and other community members on the organization, the project and FCRMs.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARC

Integrate FCRM messages into wider project communication

Communication about FCRM can be integrated into wider project communication activities for greater efficiency and clarity for community members.

While the access to FCRM channels and other details will vary by context, all projects should include a core set of information related to the FCRM. Refer to the SMILER+ stakeholder communication plan in developing FCRM communication messages and materials, and plan to include the FCRM communication materials as annexes in the SOPs. Messages and materials should be tested with diverse members of the community, and adapted and updated based on feedback to increase comprehension and trust in the information shared as well as in the feedback process more broadly.



Inform community members of the code of conduct, their rights and entitlements, and how to report concerns about misconduct or harm.

As part of the overall project communication activities and key messages about FCRM, it is important for community members to be aware of their rights and entitlements, and to understand the expected and prohibited conduct of CRS staff, affiliates and partners, as well as how to report any concerns about misconduct or harm. As noted in Tool 9: Checklist of information to share with communities, plan for frequent reminders to the community on the FCRM as part of larger project communication activities.

DESIGN START-UP IMPLEMENTATION CLOSE-OUT

RESPOND TO DOCUMENT USE DATA IN ASSESS FEEDBACK DATA DECISIONS EFFECTIVENESS

Table 6: Key information to share with communities to enhance safety, dignity, access to services, and accountability

ENABLING INFORM COMMUNITIES

SELECT CHANNELS

Key topics	Content of key messages to share with community members
Project	 The participants' right to receive free assistance based on need. Assistance should never be given in exchange for sexual, financial, social or political gain. The rights of women, men, boys and girls of all ages, ethnicities, abilities and orientations to have a say in how assistance is provided, and to be informed on the services available and the performance of the project. Project details (objectives, activities, timeline) and targeting, both at the geographic and household/individual levels. Names and roles of those working directly with the program participants. Significant changes to the program(s). The program's exit strategy.
Staff conduct	 The right to be treated with respect by staff, partners and volunteers, and to make a complaint or report any inappropriate behavior. The responsibility of organizations to prevent and address any issues of misconduct, and to protect witnesses, victims and survivors. The dos and don'ts of staff conduct,¹⁷ with examples understood in the local context.¹⁸ Information on how CRS conducts investigations of serious violations such as safeguarding and fraud. Explain that CRS' verification and investigation of sensitive allegations may be limited when complaints are submitted anonymously.
Community engagement	 The project team values community voices in project decisions and welcomes feedback on the quality, appropriateness and timeliness of support and activities provided. Community members who are not participating in project activities can share feedback and complaints as needed.

^{17.} See CRS Ethical Do's and Don'ts.

^{18.} See Communicating with Communities on PSEA.

COMMUNITIES

FCRM

- The right of community members to give feedback or complaints, and that doing so will not negatively affect their access to assistance, services or project participation, or have other negative consequences.
- The feedback channels available and how to access them (e.g., the placement of signs and suggestion boxes, the location and times of face-to-face feedback meetings, the number for the hotline.) Remind communities that talking to staff directly is always welcomed.
- Timeframes for response for each FCRM channel and category as outlined in the SOPs.
- The distinction between sensitive and programmatic complaints and feedback, the channels for submitting each type, and the expected follow-up.
- The distinction between anonymous and confidential feedback, and implications on teams' ability to respond.
- For sensitive complaints, the steps that the organization will take to ensure the safety, confidentiality and dignity of complainants, including how complaints will be handled, the roles and responsibilities of those involved, and potential limitations, such as limits to confidentiality.
- The approach for seeking and documenting consent as part of the FCRM process.
- What FCRM data will be collected and why, and how this information will be used, secured and protected throughout the data life cycle.
- Rights around personally identifiable information, how it will be used and with whom it will be shared, as well as the right to have it destroyed.
- What type of feedback teams can respond do (e.g., targeting issues, product or service quality, inappropriate staff conduct, timeliness of delivery, any other dissatisfaction or satisfaction with project activities or staff), and what is beyond their ability to respond to. This will help manage expectations.

Tools to support FCRM start-up

- Tool 1: Feedback and complaints categories
- 💳 Tool 6: FCRM standard operating procedures template
- Tool 7: Establishing a feedback and complaints registry
- Tool 9: Checklist of information to share with communities
- **Tool 10: FCRM roles and responsibilities table**
- **Tool 11: Interview questions for FCRM positions**

Key resources

- CRS Responsible Data Values & Principles 0—
- Best Practices for Data Sharing O—
- Safeguarding Sharepoint page 0—
- Privacy Risk Mitigation Tool

CHAPTER 3: IMPLEMENTATION



During implementation, staff request and manage feedback and complaints, use feedback in ongoing project decisions, and demonstrate that they value this communication through appropriate and timely response. Effective FCRMs will build and maintain trust with community members through responsiveness and open communication as well as by bringing community voices into adaptive management practices, and safely handling safeguarding and protection issues. Providing strong project management support will ensure that FCRM protocols are implemented as planned in the SOPs. In addition, it is important to review FCRM data on an ongoing basis, check on the effectiveness of the FCRM annually to ensure it is trusted and accessible to all community members, and improve the efficiency of FCRM processes as needed.

Effective FCRMs will build and maintain trust with community members.

By the end of the implementation phase, teams should have:

- Requested and acknowledged all feedback and complaints.
- Referred protection issues and out-of-scope feedback and complaints.
- ✓ Escalated sensitive complaints.
- ☑ Responded to all feedback and complaints.
- ✓ Used programmatic feedback and complaints as part of adaptive management practices.
- ✓ Monitored levels of community satisfaction with the FCRM process.
- Conducted an annual FCRM effectiveness check and made all necessary improvements.
- Determined the quality and appropriateness of the FCRM as part of project evaluations.

E CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Step 8. Request and acknowledge feedback and complaints

As part of FCRM implementation, staff will carry out their assigned roles and responsibilities to request and acknowledge feedback and complaints received via each FCRM channel. For some channels—such as a hotline—feedback and complaints will be automatically acknowledged, while for other channels, staff will need to acknowledge them in a separate step. In these cases, staff will contact individuals to let them know their feedback or complaint has been received and documented, and to clarify how long the response will take.



Demonstrate the value of feedback and complaints in communication with community members.

The attitude that staff bring to the FCRM process will greatly influence the trust and value that community members place in the system. It is important that staff practice active listening and good communication skills in all interactions related to the FCRM, and that all communication is appropriate and respectful in the local context. See the box below on Feedback collector dos and don'ts.

Always acknowledge feedback and complaints, and thank people for providing them. This demonstrates that staff are listening to feedback and that the organization is taking people's concerns and suggestions seriously. The type of FCRM channel used and whether the individual has chosen to provide personal contact information will often determine how feedback and complaints are acknowledged.

Use the following good practices to support effective FCRM communication with communities:

- Acknowledge feedback and complaints at the time of receipt, whenever possible. This can be done verbally during face-to-face conversations, electronically and automatically (SMS, phone call, interactive voice response, email or social media).
- Develop and use a scripted message that acknowledges receipt and states the designated timeline and process for response.
- Include a tear-off slip and a case number on the feedback form that is given to the individual in case they wish to follow up with staff or have further questions.
- Communicate the purpose of collecting individual contact information for follow-up, and the practices for maintaining confidentiality in the FCRM process.
- Seek and document consent from individuals providing feedback and complaints. Consent may be documented on the feedback form or directly into the FCRM database during a hotline call.
- Use individual contact information to acknowledge feedback, and communicate the response timeline and process if immediate acknowledgement was not feasible.
- Consider using community meetings, signboards or radio messages to acknowledge anonymous programmatic feedback and complaints if individual follow-up is not feasible. This is particuarly helpful if many individuals have provided feedback on a similar issue.

Acknowledgement

Initial communication with a person providing feedback or complaints, to confirm receipt and that a further response will be provided by the team.

Feedback collector dos and don'ts

The following tips for feedback and complaints collection are from the <u>Feedback</u> <u>Starter Kit</u> (IFRC 2019, p14) and can be adapted by program teams to local culture and context.

DOS

- Do clearly explain to the community member what happens with the feedback that is collected.
- ♦ **Do** ask for consent to take the person's details (People don't have to give personal details such as names. If they prefer to remain anonymous, they need to be informed that this means we cannot get back in touch with them directly).
- ♦ **Do** listen carefully to what the person has to say.
- ♦ **Do** empathize with the person.
- **Do** document the feedback thoroughly (think of the questions: What happened? Who was involved? Where and when did it happen?).
- ♦ **Do** repeat the feedback back to the person to ensure you understand the situation.

DON'TS

- ♦ **Don't** become defensive.
- ♦ **Don't** push people to give you details they don't want to share.
- ♦ **Don't** argue with the person.
- **Don't** be dismissive.
- ♦ **Don't** blame others.
- ♦ **Don't** make assumptions without knowing the facts.
- ♦ **Don't** make promises you can't keep.
- ♦ **Don't** ignore the problem.



Actively request feedback and complaints during project implementation to complement passive FCRM channel communication.

In addition to the formal FCRM channels, staff will have the opportunity to solicit feedback and complaints through ongoing project activities and interactions. In fact, many teams have found that these interactions provide valuable input on program quality improvements and communicate directly with more vulnerable community members who may face barriers to formal channels. In these active channels, it is essential that staff intentionally include vulnerable individuals to ensure their voices are heard. Staff can actively request feedback as part of post-distribution monitoring by adding questions to an existing data collection tool or during community visits by holding an open feedback session at the end of a training or workshop, for example. Create questions in monitoring tools that can quickly capture quantitative data (i.e., yes/no questions) but are also able to document narrative responses if the respondent has additional ideas (or feedback or complaints) to share.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS ENVIRONMENT COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS EFFECTIVENESS PLAN DATA

These questions are useful for actively soliciting feedback and complaints:19

- Is there anything else you would like to share about the project or service received?
- What has been your experience of program staff and volunteers?
- Do you have suggestions for improving the project?
- If you have a question or want to provide feedback or file a complaint with CRS, are you familiar with any ways in which to contact us? Please name the channels you are aware of.
- Are these ways of contacting us easy and safe for you to use?
- Are you facing any staff-related problems or issues that you would like to share with us?

Follow these recommendations to increase the value of these active feedback sessions:

- Ask probing questions to explore the feedback or complaint, and ensure enough information is shared to make it useful during adaptive management discussions.
- Manage expectations during these feedback sessions by stating that all feedback and complaints will be heard but not all can be acted upon. Staff may prepare a statement to share during these interactions, such as "We are always working to improve our projects and services, and will consider your feedback seriously, but we cannot guarantee any changes."
- Refer to previous feedback or complaints and explain how they have been addressed (or if not, why not) to demonstrate this is part of ongoing communication and maintaining trust in the system.
- Prepare an updated FAQs sheet to respond to common information requests, and plan to add new questions as they arise.
- Ensure proper documentation of the feedback and complaints received and responses provided so that this information can be included in the larger FCRM data analysis trends.

^{19.} To expand the active feedback questions to include safeguarding concerns, consider adding the following:

Is it clear how and why you were selected to receive this assistance?

Did you have to or were you asked to do or give anything in exchange for registration or to participate or receive your items? [Note: exclude program conditionalities]

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Step 9. Respond to feedback and complaints

Response can take many forms depending on the type of feedback or complaint shared, ranging from a simple answer to an information request or a referral of a protection issue, to a statement on why a change in project activities is not feasible at the time. It is critical that teams respond to all feedback and complaints in a way that is respectful and will encourage further communication. Even when an issue cannot be resolved as requested, a response and explanation should always be provided. When staff fail to respond appropriately, community members will lose trust and interest in the FCRM and even the best-prepared FCRMs may go unused.

It is critical that teams respond to all feedback and complaints in a way that is respectful and will encourage further communication.

Ignoring complaints can compromise safety

When complaints, especially serious ones, are ignored, it can result in potential safety and security risks to community members, staff and partners, or impact the quality of programming. When in doubt about the sensitive nature of information received, default to protocols for safeguarding or fraud escalation procedures relevant to the nature of the complaint.



Respond promptly to programmatic feedback and complaints using appropriate channels.

Responses to programmatic feedback and complaints should be communicated to community members using methods appropriate to the type of feedback or complaint, the channel used and local communication preferences. Teams will be ready to respond when they have had a chance to consider options for changes or actions, and reviewed trends in feedback received to determine whether it links to a larger structural issue. Clear explanations should be provided when, due to constraints, a course correction is not possible and hence no satisfactory action can be taken. The response to issues that can't be resolved should always be given directly to the individual who submitted the feedback, but it may also be useful to communicate through collective channels—such as noticeboards, community meeting announcements—if this information may be relevant to others.

A summary of the key actions to take in response to each category of programmatic feedback and complaints is provided below. Refer to **Tool 1 for a full description of feedback and complaints categories.

Category 1: Request for information

- Provide immediate answers using FAQs, if feasible.
- If the answer cannot be given immediately, request individual contact information (if not already provided) and communicate timeline for response.
- Transfer to team for follow-up as soon as possible, ideally within one week.

Category 2: Request for individual project support

- To allow for follow-up, request individual contact information if not already provided.
- Transfer to relevant team for inquiry and action as soon as possible, ideally within two weeks.

Category 3: General suggestions for service and program improvements

To allow for follow-up, request individual contact information if not already provided. Transfer to relevant team for additional follow-up, inquiry and action, ideally within two weeks.

Category 4: Appreciation of services or support

- Thank the respondent for providing the feedback, if possible.
- If possible, confirm with the individual that no response is needed.

Category 5: Complaint about services or support

- To allow for follow-up, request individual contact information if not already provided.
- Transfer to relevant team for additional follow-up, inquiry and action within two weeks.

Don't overlook vital feedback

Community members may provide feedback that questions project design decisions or challenges the assumptions embedded in the theory of change. The feedback may question the relevance and context appropriateness of services or point out the unintended impacts of CRS' presence and projects, for example, "Your assistance is undermining local capacity," "Assistance is causing tensions in the community" (i.e., is doing harm), or "We need livelihoods not handouts." When feedback cites issues beyond the scope of a single project or organization, it may be overlooked by busy project teams. However, this type of feedback is integral to reflection, learning and improvement for CRS and our peer organizations. Ensure this feedback is shared with senior leadership, sectoral team leads and other stakeholders so it can be used in strategic discussions.

Out-of-scope feedback includes requests for assistance that CRS does not provide or feedback on other service providers outside of CRS partnerships. Referral of out-of-scope feedback often requires a consultation with CP staff who may be able to recommend service providers among peer organizations or government authorities that are best placed to provide a response or the required assistance. If community members are using FCRMs to request services not provided by CRS and our partners, teams should respond with information on available services provided by other actors.

Category 9: Out-of-scope feedback

- Record and acknowledge the request.
- Refer it to other actors if feasible.
- State that the request falls outside of the project's scope if no referral is possible
- Remind the provider of the purpose and value of the FCRM for future use.

Complaints related to safeguarding are confidentially and safely escalated to support response and action.

Escalation of all sensitive complaints related to misconduct (*FCRM Category 6*) should be aligned with the SOPs and the Safeguarding Policy by following these steps:

Category 6: Any alleged violation of the CRS Code of Conduct and Ethics or Safeguarding Policy

- To allow for follow-up, request individual contact information, if not yet provided and if person wants to be contacted. Inform the individual that someone will be in touch within three working days to follow up, or sooner, depending on the gravity of the situation.
- Escalate to the EthicsPoint / country representative (or designate) or staff safeguarding focal point immediately (within 24 hours). Ensure confidentiality by limiting access to or removing PII and details of the alleged incident from the FCRM data management system.
- Appropriate referral for follow-up and support will be determined by the CR or designate. The timeframe for action should reflect the gravity of the case.

Prioritize survivor's safety and immediate needs

For safeguarding complaints, particularly those related to sexual abuse and exploitation, an essential first step is to consider the safety of the survivor or person disclosing the incident. Let the survivor tell you how they feel about their personal safety and security. Take care to not make assumptions based on what you are seeing. Where possible, address basic needs in the moment. Each person will have different basic needs, which may include urgent medical care, water, finding a loved one, or a blanket or clothing.

After ensuring the survivor's basic needs are met, and that they are not in immediate danger, listen to their concerns and complaint. The survivor may be very upset and confused, and it is important to stay as calm as possible. Allow the individual to share as much or as little information as they would like. Avoid questions that begin with 'why' as these can appear to place blame on the survivor. Instead, listen actively and with empathy, and share information on the complaints-handling process.

It is essential to maintain confidentiality at this point and immediately escalate (within 24 hours) the complaint to EthicsPoint or the CR (or designate) or staff safeguarding focal point. The sooner this can be reported, the better CRS can mitigate some of the negative consequences of incidents of abuse and exploitation. For example, sexual assault survivors often need to receive critical medical care within 72 hours of the assault, to reduce the likelihood of potential lifelong adverse consequences. Similarly, evidence indicates that, following a critical incident, expeditious access to psychosocial support can reduce the long-term impact of the event on a survivor's day-to-day functioning and well-being.²⁰

Following a critical incident, expeditious access to psychosocial support can reduce the long-term impact of the event.



Use referral pathways to support program participants and communities in accessing available protection services.

The appropriate response to protection issues will require referral to services available from external service providers. Use the mapping of service providers and referral pathways created during start-up to determine appropriate referrals. In these cases, the team will inform the community member of services available and the next steps in the referral process, while maintaining the confidentiality of personally identifiable information and any other information related to the incident.

Category 7: Other protection issues

- Where possible, using the referral pathway, provide **immediate** information on available protection services relevant to the protection concern raised.
- If immediate referral is not possible, request individual contact information, if not yet provided and if the person wants to be contacted.
- Immediately forward to the PM with a copy to the HoP/emergency coordinator.
- To maintain confidentiality, no information about this issue should be shared with other staff.
- Ensure confidentiality by limiting access to or removing personally identifiable information and details of the alleged incident from the FCRM data management system.

^{20.} Adapted from *GBV Pocket Guide* (IASC 2015). See survivor-centered communication under Look-Listen-Link framework.

To address and mitigate this issue within the program, the following actions are recommended:

- Immediately share the issue with the HoP and program manager to consider any actions needed at the program level to reduce or mitigate this risk. Only share personally identifiable information when necessary.
- The HoP, in consultation with the CR, can decide on any additional action required, e.g., reporting to the protection cluster or government.
- Where possible, the HoP can maintain a log of protection incidents to track trends to inform future programming decisions and actions to enhance the safety and dignity of program participants. For example, if incidents of intimate partner violence are being reported across multiple programs, further investment may be needed at the CP level to enhance mitigation measures for this risk.
- Regularly update maps of external service providers and how to contact them.
- Train staff on whether, when and how to refer cases safely, using a survivor-centered approach.²¹

Monitor levels of satisfaction with the FCRM to enhance accountability to the communities we serve.

To enhance accountability to the communities we serve, ask community members about their level of satisfaction with the FCRM process after a response is given. Teams may reach individuals using the contact information they have shared. Use a simple rating scale and provide an opportunity for them to give suggestions on FCRM improvement. If feasible, these satisfaction levels can be sought and documented as part of the response process or as part of ongoing project monitoring or evaluation data collection activities.

Monitoring satisfaction

Teams may monitor FCRMs by developing indicators and targets related to satisfaction levels. For example, a project's MEAL system may include an indicator for "Percentage of program participants reporting high or very high satisfaction with the FCRM process" or "Average satisfaction rating for FCRM among program participants." These indicators demonstrate a commitment to satisfaction with the FCRM, and ensure that MEAL systems track satisfaction and that teams consistently reflect on FCRM satisfaction levels and targets.

^{21.} See the *GBV Pocket Guide* (IASC 2015) for useful guidance on a survivor-centered approach, available in multiple languages here.

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Step 10. Document and manage data

Good practice for FCRM documentation and data management requires tracking all steps in the FCRM process (i.e., acknowledgement and referral, if applicable) before closure or response. In addition, teams should apply data protection practices to FCRM data to maintain confidentiality and uphold responsible data principles. The roles and responsibilities for active management of FCRM data will be outlined in Tool 10: FCRM roles and responsibilities table in the SOPs and should be updated as needed during implementation.

Teams should apply data protection practices to FCRM data.



Apply good practices for data management and data protection to FCRM data.

FCRMs are designed to ensure confidentiality, a timely response and attention to urgent matters. To achieve these goals, the data management, documentation and information-sharing processes need to be regularly assessed to identify and resolve challenges with responsible data management, gaps in internal information sharing between teams, and delays in response caused by inefficiencies in FCRM data storage and reporting.

Key recommendations for FCRM data management practices:

- Password protect or encrypt FCRM data management systems and all associated files.
- Document the names, contact information (email), and role of CRS and partner staff who will have access to feedback and sensitive complaints. Do quarterly, biannual or annual reviews of the list of staff who have access to these systems and confirm it with the project or country management. Remove access for staff who have changed roles or are no longer involved in the project or CP FCRM.
- Avoid emailing FCRM data files.
- Store hard copies (logbooks, feedback forms) in locked filing cabinets with clear protocols for access and destruction.
- Destroy hard copy files once digitally documented in the electronic data management system.
- Determine the length of storage and steps for de-identification and archiving of the FCRM data after project close-out by considering donor and agency requirements.

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Step 11. Use data in decision-making

Internal demand for feedback in making ongoing project management and strategy decisions signifies a healthy enabling environment for FCRM. Programmatic feedback and complaints can inform program quality improvements when strong adaptive management practices are in place. Senior leadership can support FCRM data use by engaging with program and MEAL staff to seek their interpretation of what feedback means for current and future projects and operations. At the project level, quarterly and annual review meetings offer an opportunity for teams to reflect on and interpret the trends and content of FCRM data. These reflection opportunities contribute to adaptive management processes because they offer a broader view of how the programs are perceived and experienced by diverse participants and other community members.

Reflection opportunities contribute to adaptive management processes.



Regularly analyze FCRM data to provide timely and user-friendly feedback and complaints trend reports for review, decision-making and action.

FCRM data is a relevant and valuable addition to the range of information used for program-level and strategy-level decisions and adaptive management. Regular analysis of FCRM data and presentation of the trends in complaints and feedback is important to supporting FCRM data use in adaptive management and the responsiveness of program teams. FCRM data should be made available to program managers and decision-makers in accessible formats, such as data summaries, visuals and dashboards.

Refer to
Compass
Standard 11,
Key Action 3
for more
guidance on
analysis of
MEAL data
to inform
quarterly
reflection
meetings.

Tips for FCRM data analysis:

- Regularly analyze FCRM quantitative and qualitative data to identify larger trends and how those change by month or by quarter.
- Summarize the key points in feedback received, noting the key characteristics of individuals sharing feedback, such sex, age, disability and geographic area.
- Remember that individual perspectives are as important as larger trends in informing data use.
- Triangulate perspectives within feedback received and against monitoring results as part of FCRM data interpretation.
- Analyze FCRM data by each channel (active and static), sex, age and other key characteristics, FCRM category and geographic area.
- Check the satisfaction levels with the FCRM, and determine whether and why these may vary by community group.
- Track the response rate to feedback and complaints, calculating the percentage of responses that meet the project's commitment for response time, and the average response time for each category and channel.
- Explore new comparisons and trends as initial ideas and findings emerge during preliminary analysis.
- Identify any errors in the completion of the FCRM registry or concerns of FCRM data quality and data protection.

DETERMINE CONTEXT SELECT

Raise concerns

If FCRM data analysis reveals that some channels are not used, or not used by certain community groups, or that the response rate or time is inadequate for some feedback or complaints, raise these concerns directly with the program teams so that they can further investigate and address gaps in the FCRM as needed.

Triangulate feedback and complaints with MEAL data to inform ongoing decision-making and adaptive management.

Feedback, when used alongside monitoring and evaluation data, offers additional voices and suggestions that can help teams interpret and understand program participants' experience and perception of services and program staff. Project teams should analyze FCRM data along with monitoring data during quarterly and annual project review meetings to understand different community perspectives and reflect those in ongoing decision-making. Further, these reflection opportunities may identify ways to improve the FCRM if gaps appear in the use of FCRM channels by specific groups, or response rates do not meet project commitments.

These practices are suggested to enhance data use in project decision-making:

- Prior to a review meeting, share visuals of FCRM data trends and summaries of data received.
- To accompany data visuals, prepare reflection questions seeking to understand trends and content by asking who these data do and don't represent, what we know and what else we need to know to make project decisions.
- Triangulate FCRM data with monitoring data and staff observations.
- Include field staff and other stakeholders in interpretation, as feasible, to ensure a range of viewpoints are represented and common biases are more easily challenged.
- Seek what is consistent and what is different in feedback provided by different community groups.
- Determine whether additional perspectives or data may be needed to help understand feedback or determine an appropriate response.
- Interpret FCRM trends within the project context and timeline to determine how the implementation of various activities influences the type and number of feedback and complaints received.

Refer to
Compass
Standard 11,
Key Action 4
for more
guidance on the
interpretation
and use of
feedback
during quarterly
reflection
meetings.

ESIGN START-UP IMPLEMENTATION CLOSE-OUT

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN **ASSESS** CLOSE-OUT ARCHIV SCOPE ANALYSIS CHANNELS RESOURCES CHANNELS ENVIRONMENT COMMUNITIES FEEDBACK FEEDBACK DATA DECISIONS **EFFECTIVENESS** PLAN DATA

Step 12. Assess FCRM effectiveness

Effectiveness checks help improve FCRMs during implementation as the context evolves, and as expectations and preferences for communication change over time. While ongoing use of FCRM data will often identify gaps in the system and areas for improvement, annual effectiveness checks are intended to look in-depth at longer-term trends in FCRM data, and solicit perspectives and experiences of FCRM from communities and staff to generate recommendations for improvement. In contrast, evaluations provide an opportunity to understand the quality and appropriateness of FCRM design and how feedback was used in programming decisions to contribute to larger project and agency learning needs.

Effectiveness checks help improve FCRMs during implementation.



Conduct FCRM effectiveness checks to ensure channels are safe, accessible and trusted by community members for programmatic and sensitive feedback and complaints.

Effectiveness checks use existing FCRM data and conduct staff interviews and community consultations to reflect on the FCRM and develop priority recommendations for improvement. These checks can explore questions raised by ongoing data use during quarterly review meetings and may be combined with annual review meetings or larger MEAL system reflection events, if appropriate. In development programs, it is recommended that these checks are conducted annually during implementation to improve responsiveness, the utility of FCRM data in adaptive management practices, adherence to policies and requirements, and community and staff value of FCRM.

In planning an annual FCRM effectiveness check, refer to Tool 12: FCRM effectiveness check and follow these key steps:

- Review the FCRM database to identify trends in feedback and complaints, use of different channels by various community groups, and the completeness of the FCRM registry.
- 2. Interview staff to determine their clarity on FCRM roles and responsibilities, understand their experiences of FCRM, and identify opportunities to better support them in implementing an effective FCRM.
- 3. Consult different community groups, including men and women and those *most* and *least likely* to use the FCRM, to understand their access to, use of and trust in the FCRM.
- 4. Reflect with MEAL, program and field staff on initial findings to generate key recommendations and an appropriate action plan.
- 5. Document and communicate changes to the FCRM with stakeholders, including donors and communities.



Tool 12: FCRM effectiveness check

Presents key steps, guidance and reflection questions for use in interviews and focus groups associated with the annual FCRM effectiveness checks.

What makes an effective FCRM?

Teams may see increased or reduced use of FCRM channels during implementation and wonder what this means for overall FCRM effectiveness. Here, the key characteristics of an effective FCRM are summarized so that teams can reflect on this point when seeing critical changes in use.

- Staff (MEAL and program) have clear roles related to FCRM implementation and have the necessary capacity to fulfill those roles.
- Community members are aware of the purpose of the FCRM, how to access individual channels and what to expect regarding response.
- All FCRM channels are in use.
- ♦ Individuals from diverse community groups are using the FCRM.
- ♦ The response timeline meets or surpasses the commitment that teams have made.
- Satisfaction with the FCRM is high among individuals who have submitted feedback or complaints.
- Sensitive complaints are escalated immediately as per local and agency protocol.
- Feedback and complaints are used in ongoing project decisions.

Use evaluations to contribute to project and agency learning about effective FCRMs.

Evaluations offer an opportunity to assess the quality and appropriateness of initial FCRM design, the responsiveness of the mechanism, adherence to policies and requirements, and its contribution to program quality and impact. FCRM evaluation should be responsive to context by building on earlier findings from ongoing data use and effectiveness checks, and also address how the FCRM has contributed to adaptive management and overall program quality.

To include FCRM in evaluation events, FCRM managers should review the initial context analysis and community consultation for FCRM, FCRM design documents, the SMILER+ FCRM flowchart and SOPs, the FCRM database and prior annual effectiveness check findings, to identify key information needs to reflect in evaluation questions.

EFFECTIVENESS

Suggested evaluation questions related to FCRM include:

- Did the initial context analysis and community consultation result in an FCRM appropriate to the local context? If so, how? If not, why not?
- Are community members satisfied with FCRM accessibility and responsiveness? Why or why not? Which community members are most satisfied and which community members are least satisfied and why?
- Do some community members face barriers to accessing the FCRM? If so, who, and how can these barriers be addressed?
- Do community members trust the FCRM? Why or why not? Which community members are most likely to trust the FCRM and which are least likely to trust the FCRM and why?
- Did the FCRM contribute to community ownership and engagement in project activities? If so, how? If not, why not?
- Has the FCRM contributed to adaptive management practices and larger improvements in program quality and impact? If so, how? If not, why not?
- Were recommendations from annual FCRM effectiveness checks successful in improving the quality and value of FCRM? If so, how? If not, why not?
- Are staffing structures and support among CRS and partner organizations appropriate to design, implement and use the FCRM? If so, why? If not, why not?
- How and why did the FCRM evolve during project implementation and what difference did this make for overall program quality and impact?

Evaluate to evolve

In ① emergency responses, real-time evaluations can include questions about FCRM channels in place with a view to gathering additional input to inform the design or addition of new channels as the context stabilizes and the response evolves.

Tools to support FCRM implementation

- Tool 6: FCRM standard operating procedures template
- Tool 12: FCRM effectiveness check

Key resources

- Compass Standard 11, Key Action 3
- Compass Standard 11, Key Action 4
- Community consultations on FCRM, SPSEA Toolkit, Handout 5.2, page 92
- Community dialogue on PSEA, SPSEA Toolkit, Tool 6, page 226

CHAPTER 4: CLOSE-OUT



FCRM close-out should be largely integrated with overall project close-out and communication; however, the specific steps depend on the scope of the FCRM and the channels used. The close-out phase provides an opportunity to support partner organizations to sustain the FCRM and to contribute to a larger organizational learning process about effective FCRM practices.

FCRM close-out decisions made during design should be revisited to reflect new opportunities and constraints related to FCRM sustainability. Update these plans based on changes in context, and communicate the final steps for FCRM close-out to community members and other stakeholders. Here are several common scenarios for FCRM close-out:

- While project-level channels close at project completion, CP-level channels remain available, and communities are encouraged to continue using these to submit feedback and complaints.
- The FCRM is fully closed upon project completion and the team communicates the timeline and process for close well in advance so that community members are able to share feedback and complaints prior as needed.
- The FCRM is handed over to partner organizations upon project close through the transition of staff roles and responsibilities and capacity support as needed.

During close-out, teams should archive FCRM data according to donor, government and agency requirements as they apply to all MEAL data. Teams will, at minimum, de-identify all personal information in the FCRM dataset before it is archived, but additional data protection practices may be required within the operating context (refer to *CRS Guidelines for De-Identifying Data* or additional information). Additionally, teams have an opportunity during close-out to reflect on FCRM implementation through a light after action review (AAR) and thus contribute to learning and FCRM quality.

The close-out phase provides an opportunity to support partner organizations to sustain the FCRM.

DESIGN START-UP IMPLEMENTATION CLOSE-OUT

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

By the end of the close-out phase, teams should have:

- ✓ Updated an FCRM close-out plan with clear responsibilities for all stakeholders.
- ✓ Communicated the FCRM close-out plan to community members and stakeholders.
- Archived de-identified FCRM data according to requirements and data protection practices.
- ✓ Conducted an after action review on the FCRM.
- ✓ Disseminated the AAR findings to other teams.
- Consolidated all FCRM documentation, including the SOPs, for future reference.

Step 13. Update and communicate close-out plan

Close-out, like start-up, is a demanding process requiring careful planning. Besides cross-disciplinary planning, the Compass close-out standards highlight the need for appropriate staffing, efforts to promote sustainability, and learning and reflection as part of handover and close-out project activities. Transparency with community members and other stakeholders about both project closure and changes related to FCRM supports accountability, maintains trust and ensures a smooth close-out and handover process.

Refer to the Compass Standards and Key Actions related to close-out for more information.

Integrate FCRM close-out into wider project close-out decisions and activities.

The feasibility of sustaining an FCRM in its full or partial scope should be assessed with senior leadership, partners and peer organizations when in consortia arrangements. CRS principles of subsidiarity and commitment to locally led processes mean that teams should seek to continue FCRMs through CP-level support or handover to partner organizations as feasible even after project close, if possible. When handover is planned, the close-out phase should address any identified capacity strengthening needs related to FCRM implementation and management.

Communicate the close-out plan to communities and other stakeholders.

Timely and open communication with community members and other stakeholders is an important part of accountability that can be further supported by FCRM practices during close-out. During project closure, program staff need to provide clear information about FCRM closure plans to partners, consortium members, community members and other stakeholders, explaining the timeline and steps that will be followed. Many FCRM channels can themselves be used to provide information about close-out or handover, and to respond to any questions, concerns and suggestions related to this process. It is important to begin this communication early to allow for several exchanges with community members and stakeholders on FCRM during close-out as needed.

Communication efforts should follow the initial planning in the SMILER+ stakeholder communication plan in terms of which stakeholders, including key community groups, should be included and what means of communication are most appropriate. This will require the updating of existing materials or the development of new communication materials (e.g., posters and flyers) and messages, which should be translated into local languages and tested with community members for clarity and completeness before they are finalized.

Reinforce the value of FCRM

As part of good communication practice, teams can report to communities what type of feedback was most useful for program improvement and what feedback trends will be shared with other teams to act on in future program design. This is particularly helpful when channels will be sustained or handed over to partners as this is an opportunity to reinforce the value of FCRM communication between communities and staff.

Step 14. Archive data and document learning

After communication on FCRM handover or close-out has been initiated, teams should focus on archiving FCRM data and documenting learning from the FCRM through an after action review. These processes will support continued improvement in FCRM quality, allowing other teams to benefit from the general trends in feedback received, and the challenges and successes with the FCRM, and to draw from materials developed for the FCRM during design, start-up, implementation and close-out.

Apply responsible data values and principles when archiving FCRM datasets.

When archiving FCRM data, follow responsible data management principles and protocols on all feedback and complaints received. While donor expectations for the sharing and archiving of data sets are determined during proposal development, teams should consult the data protection team, MEAL, and national data-sharing regulations, as appropriate, to finalize key steps related to FCRM data as part of the close-out plan. In the absence of donor or national requirements or regulations, teams should archive or retain de-identified FCRM data for two years before destruction or deletion.²²

^{22.} The recommendation to retain de-identified FCRM dataset for two years is based on the CRS Document and Records Retention Schedule requirement for M&E data, which states: Retain as active records for a minimum of 2 years or until no longer needed or required for use in daily work activities.

DETERMINE CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE SCOPE ANALYSIS CHANNELS RESOLUTES PLAN DATA DECISIONS EFFECTIVENESS PLAN DATA

At minimum, teams should de-identify data by removing all personally identifiable information and follow any national, donor or local regulations on MEAL data archives and all local data storage (laptops, servers). In FCRMs, PII generally consists of name, date of birth (or age), location and phone number. At minimum, de-identification would require removing the name, phone number and date of birth (age can be kept), whereas the need to de-identify location data will be determined by the local context. Some feedback or complaints may include names or specific locations or activities and, in these cases, teams would need to de-identify references within the documented narrative of the feedback or complaint. After FCRM data have been de-identified, teams can still use datasets to view overall trends or stratify trends by age, sex and general location. See the CRS Guidelines for De-Identifying Data O—n for additional information.

At minimum, teams should de-identify data by removing all personally identifiable information and follow any national, donor or local regulations.

Country programs de-identify data on a rolling basis

CP-level FCRMs will use a different approach to archiving FCRM data as they don't follow the project cycle. Instead of archiving data, it is recommended that CP-level FCRMs de-identify data on a rolling basis, two years after the feedback or complaint was received. In many cases, teams may design their FCRM data management systems to automate this process. With rolling de-identification practices in place, CP teams can continue to use their growing FCRM datasets to identify general and specific trends, and understand the overall effectiveness of the system.



Communicate the learning from FCRM design, implementation and close-out with programming and MEAL communities and other stakeholders.

To support knowledge management for institutional learning and future program improvement, teams should reflect, document and share key lessons from the FCRM to inform the practices of other teams. While it is recommended to include questions on the FCRM—and its larger contribution to program quality—in evaluation events, an after action review is a sound and simple approach for reflecting on the FCRM design and implementation upon close-out. This review can be combined with a larger reflection on the MEAL system, or included in a final evaluation or other reflection opportunity. In addition, including questions about the FCRM in final surveys and focus group discussions helps to assess community members' level of satisfaction with the responsiveness of the FCRM and to what extent the FCRM met their information and communication needs.

CONTEXT SELECT ALLOCATE ESTABLISH ENABLING INFORM REQUEST RESPOND TO DOCUMENT USE DATA IN ASSESS CLOSE-OUT ARCHIVE

Plan for an after action review

Plan for a half-day session and include CRS and partner MEAL and program staff in the reflection. The facilitation approach should encourage participation and openness to ideas and constructive criticism.

Ask the following questions:

- ♦ What did we intend to do with our FCRM?
- Did we achieve what we intended to? Why or why not?
- What would we do differently next time?
- Who needs to learn from our experience?

Document and disseminate results

Consider producing a report or an infographic of the top 5 learning points from the review. Plan to share a summary with relevant CRS and partner teams and communities of practice, along with the FCRM SOPs and other documentation.

Key resources

- CRS Guidelines for De-identifying Data 0—
- <u>After Action Review Guidance</u> (Better Evaluation 2019)



Accountability The process of using power responsibly, and taking account of and being held accountable by stakeholders, primarily those who are affected by the exercise of such power.

Acknowledgement Initial communication with a person providing feedback or complaints, to confirm receipt and that a further response will be provided by the team.

Active feedback channels These solicit feedback from program participants by using a range of methods, such as surveys, focus group discussions, listening sessions, unstructured interviews with individuals, and open community discussions and meetings during which group feedback is solicited.

Allegation An assertion of facts that are intended to be proved at trial or during an internal investigation procedure.

Code of conduct A set of behavioral standards that staff and volunteers of an organization are obliged to adhere to.

Complainant The person making a complaint, including the alleged victim/survivor of sexual exploitation, abuse or harassment, or another person who becomes aware of the wrongdoing.

Complaint A specific grievance by anyone who has been negatively affected by an organization's action or who believes that an organization has failed to meet a stated commitment.

Confidentiality An ethical principle that restricts access to and dissemination of information. In investigations on sexual exploitation, abuse, fraud and corruption, it requires that information is available only to a limited number of authorized people for the purpose of concluding the investigation. Confidentiality helps create an environment in which witnesses are more willing to recount their versions of events, and builds trust in the system and in the organization.

FCRM channel A channel through which feedback and complaints are conveyed from program participants and their communities to program staff, such as a hotline, suggestion box or help desk. Channels may be static or active and should support face-to-face, confidential and anonymous communication.

Adapted from: CHS guidance notes and indicators (CHS Alliance 2018); PSEAH implementation quick reference handbook (CHS Alliance 2020); Guidelines for integrating gender-based violence interventions in humanitarian action: Reducing risk, promoting resilience and aiding recovery (IASC 2015).

FCRM data management system One or more tools—paper and/or digital—that follow a case from the initial uptake of the feedback or complaint to the point of case closure.

Feedback Information used by aid organizations about people's perceptions, opinions, concerns and suggestions on behaviors, activities, projects, priorities and strategies. Feedback includes positive statements as well as critiques and suggestions for improvement.

Open feedback Questions, feedback and complaints that have not yet been responded to or resolved. When feedback is acknowledged but the participant has not yet received a full response, the feedback is still open.

Closed feedback Questions, feedback and complaints to which a response has been provided (the response does not have to be satisfactory to the program participant) or referred and/or action taken to resolve the complaint.

Feedback, complaints and response mechanism A formal system established and used to allow program participants, community members, partners and any stakeholders to provide information on their experience of an organization, response or program. Such information is then used to take corrective action to improve an element of the organization's work.

Out-of-scope referral A request for support not provided by the project, or programmatic feedback on support provided by another actor.

Personally identifiable information Personal information, written or recorded, that can be linked to a specific individual and that alone or in combination can be used to identify the individual (Source: CRS Guidelines for De-identifying Data).

Protection All activities aimed at obtaining full respect for the rights of the individual in accordance with the letter and spirit of the relevant bodies of law, namely human rights law, international humanitarian law and refugee law.¹

Protection against sexual exploitation and abuse A term used by the United Nations and NGO community to refer to the measures taken to protect vulnerable people from sexual exploitation and abuse by their own staff and associated personnel.

Protection mainstreaming Protection mainstreaming, or safe and dignified programming, is the process of incorporating protection principles and promoting meaningful access, safety and dignity in humanitarian aid and/or development programming.

Response Communication to address feedback or complaints which may or may not include actions to address the issues raised. Also referred to as "closing the feedback loop," response should be provided in a way that encourages continued communication between the community and project team.

^{1.} Policy paper: Protection of internally displaced persons (IASC 1999).

Safeguarding The responsibility that all organizations have to ensure that their programs and staff, and those engaged by or in service to the organization, honor and protect the rights and dignity of all people—especially children and vulnerable adults—to live free from abuse and harm.²

Static feedback channel A means by which community members and program participants can communicate with staff at the time and on the subject they choose. Examples include suggestion boxes, hotlines, email addresses, SMS lines, and office walk-ins.

Survivor or victim A person who is, or has been, sexually exploited or abused. The term "survivor" implies strength, resilience and the capacity to survive. The term "victim" has protective implications, as it implies the victim of an injustice that should be redressed.

Victim/survivor-centered approach An approach in which the victim/survivor's wishes, safety and well-being remain a priority in all matters and procedures.

^{2.} CRS Policy on Safeguarding (CRS 2019).

