

CBM Global Policy: Programme Feedback and Complaints

May 2021



Policy and Statements

An open attitude to feedback and complaints on our work is paramount to CBM Global's ability to improve as an organisation, to facilitate learning, and to break down donor - recipient power dynamics when working with others.

This policy relates to formal and informal feedback and complaints related to our projects and programmes. It reflects CBM Global's openness and responsiveness to any type of feedback including suggestions and complaints, in order to be accountable to all we work with and who may be affected by our work, most importantly people with disabilities and their communities as well as our partners.

The purpose of this policy is to:

1. Comply with accountability standards and recognised rights:
 - a. Internal or external requirements and standards (including the Core Humanitarian Standard)
 - b. Peoples' rights to have their voices heard; and
 - c. For CBM Global to be held to account by programme participants and their communities, our partners and any other actor we collaborate with on the commitments we make.
2. Foster empowerment: the feedback mechanism can contribute towards a process of empowering the communities we serve through participation and dialogue.
3. Create trust and transparency by demonstrating active listening and being responsive.
4. Promote prevention of abuse as people gain confidence and trust to report.
5. Enable early warning: help identify risks and issues that can be remedied at an early stage.
6. Support monitoring and evaluation and continual improvement: feedback as a way of improving programme quality through addressing concerns and issues raised by all relevant stakeholders.

Definitions

Feedback is an opinion about CBM Global's work which may be positive (a compliment), neutral, helpful (such as a suggestion for improvement), or negative (a complaint).

A **complaint** is a specific grievance of anyone who considers that they or others have been negatively affected by CBM Global's action or who believes that CBM Global has failed to meet a stated commitment.

CBM Global's Code of Conduct describes the objectives and rules that reflect our commitment to responsible, ethically irreproachable and legally compliant behaviour, that is consistent with the organisation's values, mission and professional standards.

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

Scope

This policy relates specifically to programme feedback and complaints. Annex 1 details the mechanisms in place for feedback and complaints relating to whistleblowing, safeguarding and SEAH. If a complaint is submitted through the programme feedback mechanism and relates to one of the above, it will be referred on to the correct channel.

CBM Global encourage both informal and formal feedback, the mechanisms for both are outlined below. CBM Global also supports partners in strengthening their community and programme participant feedback mechanisms.

The scope is confined to activities for which CBM Global is responsible or is within our sphere of influence. The Programme Feedback and Complaints Policy creates no legal obligations for and no legal recourse against CBM Global.

The scope does not cover general queries about CBM Global's work; requests for information; requests for additional budget; contractual disputes; or requests to amend records, postpone deadlines, transfer funds or goods, as these are addressed through regular communication and business as usual.

The scope of this policy does not cover feedback to individual CBM Global Member Associations from donors or supporters on their domestic practices/activities. Individuals wishing to provide feedback or a complaint to a specific CBM Global Member Association can do so through that Member Association's specific feedback mechanism.

Whom is this for?

The CBM Global Programme Feedback and Complaints Policy applies to all feedback from external stakeholders relating to CBM Global's programme work and should be used by partners, contractors, clients, programme participants and community members.

In support of our commitment to accountability, CBM Global seeks to ensure all stakeholders including partners are aware of our programme feedback and complaints mechanism and that in CBM Global supported projects, regular information is provided on its existence.

We expect and actively support our partners to have (or be in the process of developing) their own feedback and complaints system adapted to the local culture which enables them to deal appropriately with feedback received from community members and programme participants regarding work the partner undertakes which is supported by CBM Global. Such accessible and contextualized feedback mechanisms and their set up need to be agreed on during participatory and inclusive project planning processes, detailing how feedback will be received and applied throughout the course of project implementation.

Outline of the policy

CBM Global's 6 principles for handling of feedback and complaints:

1) Timeliness

CBM Global aims to respond to all feedback expeditiously. All complaints will be attended to within two working days of receipt. This response includes seeking to make contact with the complainant, to acknowledge receipt and inform on the follow-up.

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

2) Confidentiality

CBM Global encourages open and transparent feedback. For example, at community meetings or meetings with stakeholders about a project, feedback is welcomed. We also understand that in some instances the person providing feedback may wish to do so confidentially and that the ability to provide confidential feedback is essential to the viability of any feedback system.

For formal complaints, the complainant's identity will be kept confidential by the CBM Global investigation team, when this is requested by the complainant. No identifiable information will be shared beyond the investigation team, without the informed consent of the complainant. CBM Global will ensure the complainant details (specifically any identifying information) are securely filed and only accessible to the CBM Global personnel handling feedback. The complainant details will be used to make contact with the complainant to gather further information or update on the progress of feedback.

The Safeguarding feedback mechanism (see Annex 1) is there to be used in the instance of a safeguarding complaint or complaint related to SEAH. Any cases involving SEAH will be handled with a survivor centered approach. CBM Global is committed to providing appropriate assistance and referrals to survivors including for example medical, social, legal and financial assistance, or referrals to such services. Please refer to CBM Global's Children and Adults-at-risk Safeguarding Policy and PSEAH Policy for further details.

In case a complainant wishes to file a complaint anonymously there is the possibility to use the Whistle-blowing mechanism (see Annex 1).

3) Mutual Respect

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

4) Participation and Accessibility

CBM Global is committed to promoting equal access and participation of all women, men, girls and boys with disabilities in the countries in which we work. It is CBM Global's responsibility, in line with the Convention on the Rights of Persons with Disabilities, to

ensure and promote accessibility based on the Principles of Universal Design in all spheres of our work. Participation of the programme participants and their community during project planning and implementation will ensure that we jointly create, implement and support the development of feedback and complaints mechanisms which are made available to all stakeholders considering location, gender, age, ethnicity, disability and language. Reasonable accommodation will facilitate access and use at the community level.

In the case of the CBM Global Programme Feedback and Complaints Policy, it is a minimum requirement that the feedback mechanism is shared in the main local language at the country level including the different modalities of providing the feedback. In addition to the feedback email, postal address and WhatsApp number, the 'Contact Us' form on the CBM Global website allows for initial contact to be made without immediately disclosing a complaint. The data form can be accessed by mobile phones requiring minimum bandwidth and enables the complainant to then be contacted in their preferred mode of communication, in their language and with any reasonable accommodations.

5) Commitment to Learning

CBM Global will log and monitor all feedback that meets CBM Global's definitions as outlined in this policy. Acknowledging that learning outcomes are derived from both positive and negative experiences, both positive and negative forms of feedback (including complaints) will be incorporated into CBM Global's procedures for monitoring feedback, including formal and informal. The outcomes will be reported and analyzed to assist in the identification of systemic and recurring problems and inform improvements to service delivery. CBM Global will feedback to affected communities, partners and staff on how we are improving/adapting our practices as a result of the learning.

Feedback can also be gathered proactively whether during monitoring visits or regular conversations. Country Teams and Partners alike are encouraged to capture and log informal feedback.

6) Resources

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

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

Providing Informal Feedback to CBM Global

CBM Global strongly encourages that informal comments and concerns about our work are raised with our staff or partner organisations as close to the activity as possible. This allows for immediate response and responders know the context. Informal feedback can be provided through meetings, discussions, monitoring visits, emails or any other interactions with CBM Global staff.

All CBM Global staff are expected to proactively encourage feedback and log it on behalf of any stakeholder from the community, our programme participants, the staff of our partner

organisations or from any organisation of persons with disabilities (OPDs) or other (international) organisations in the countries where we work. Country Teams and other CBM Global entities should capture and record informal feedback in Global Online. The 'CBM Global Process Guide: Feedback and Complaints', details how this should be done.

Any material informal feedback that requires further follow up can be logged officially using the mechanisms outlined in this policy. Alternatively, any of the complementary mechanisms can be used as appropriate.

Providing Formal Feedback to CBM Global

CBM Feedback including compliments, suggestions or complaints can be lodged in the following ways:

- **E-mail:** feedback@cbm-global.org
- **Post:** Dr.-Werner-Freyberg-Str. 7, 69514 Laudenbach, Germany
- **Contact Us form:** www.cbm-global.org

Anyone who wishes to provide feedback or lodge a complaint is requested to indicate his/her full name, relationship to CBM Global and contact information. If an individual wants to provide feedback or a complaint, they should include as much information as possible (who, where, when, what). We do not recommend to send anonymous complaints, because it makes it more difficult for CBM Global to assess the case, to find an effective resolution and record it. In case a complainant wants to send concerns anonymously, please consider using CBM's Whistle-blower mechanism as outlined in Annex 1.

Complaints should be lodged as soon as possible and preferably no later than three months after the relevant incident as the longer time passes between a grievance and lodging a complaint, the more difficult it can be to resolve the complaint satisfactorily.

Staff, volunteers, contractors and partners who are aware of possible wrongdoing (including an issue related to a breach in code of conduct or staff handbook) have a responsibility to disclose information with the assurance that by in good faith disclosing perceived wrongdoing they will be protected from adverse employment consequences.

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

Complaints that do not fall within the scope of CBM Global will be referred to the relevant party in a manner consistent with good practice.

For further information on the internal process for handling the feedback or complaint please refer to CBM Global Process Guide: Feedback and Complaints. Details of how this policy works alongside other CBM Global feedback and reporting mechanisms can be found in Annex 1.

How to implement?

Governance and management policy implementation actions:

1. CBM Global will integrate feedback and complaints handling mechanisms into relevant core programming processes.
2. Country Directors (or those responsible for areas of work/projects in instances where work is taking place where we do not have Country Offices) will ensure implementation of the provisions of this policy in the following ways:
 - a. Ensure that all staff, representatives and partners are informed about this policy and their responsibility to take in feedback and complaints from all stakeholders.
 - b. Support partners to develop and apply contextualized feedback/complaints mechanisms, ideally in relation to and aligned with safeguarding mechanisms and staff competencies.
 - c. The CBM Global Code of Conduct and CBM Global's Children and Adults-at-risk Safeguarding policy are to be made publicly available with communities and local stakeholders.
3. CBM Global will provide information on its Feedback and Complaints mechanism in CBM Global offices and on CBM Global websites.
4. The implementation of the policy will be monitored through standard tools and processes related to capacity assessment of partners and CBM Global Country Offices. The policy will be reviewed and, if necessary, revised annually, or earlier if needed

Key references and supporting documents

- CBM Global Process Guide: Programme Feedback and Complaints
- CBM Global Programme Quality Framework
- CBM Global Approach to Partnership
- CBM Global Children and Adults-at-risk Safeguarding policy
- CBM Global Inclusion and Diversity policy
- [Core Humanitarian Standard](#)
- CBM Global Code of Conduct (2021)
- CBM Global Policy on Sexual Exploitation, Abuse or Harassment
- CBM Global Accessibility Policy
- CBM Global Whistleblower Policy

Annex 1: CBM Global's feedback and complaints mechanisms

Programme Feedback and Complaints Mechanism

- Available for concerns, complaints, compliments or suggestions about the nature or quality of programme delivery, compliance with our policies, systems, processes and procedures, CBM Global's lack of action, or behaviour of CBM Global staff, volunteers or contractors. This system is not anonymous, but all complaints are treated as highly confidential.
- For use by anyone affected by CBM Global's work including partner organisations, programme participants and community members.
- Email: feedback@cbm-global.org
- Post: Dr.-Werner-Freyberg-Str. 7, 69514 Laudendach, Germany
- Contact Us form: www.cbm-global.org

Whistleblowing Mechanism

- Available for anyone to anonymously report irregularities, risks, safeguarding or SEAH incidents or violation of CBM Global's Code of Conduct.
- For use by anyone affected by CBM Global's work, including partner organisations, programme participants and community members.
- Please refer to CBM Global Whistleblowing Policy

Safeguarding and SEAH Mechanism

- A safeguarding or SEAH incident suspected, witnessed or disclosed to you can be reported through the following methods:
- To the safeguarding focal person in CBM Global's local office via phone, email, text, skype or face-to-face. If the safeguarding focal person is not available, report to the Country Director.
- To the CBM Global Safeguarding Manager: safeguarding@cbm-global.org
- For use by anyone affected by CBM Global's work, including partner organisations, programme participants and community members.
- Please refer to [CBM Global's Children and Adults-at-risk Safeguarding Policy](#) and [CBM Global PSEAH Policy](#)

CBM Global Disability Inclusion

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