

How to establish a complaint and response mechanism



**Center for Church-
Based Development**

TOGETHER WE CREATE HOPE

Introduction

This guide describes how to set up a complaint and response mechanism as part of your organisation's safeguarding system including steps to be taken and important principles to consider. The guide aligns with [CKU's Safeguarding Policy](#) which was adopted in January 2024.

One of the goals of the policy is to “foster accountability towards participants through a complaint and response mechanism”. Effective complaint and response mechanisms are a key tool to identify and prevent malpractice, power abuse and sexual exploitation. By providing project participants with channels to report their concerns, complaint and response mechanisms allow disclosure of exploitation and abuse which ultimately fosters accountability and protection.

Grant recipients of the CKU Fund and the FoRB-Window, who receive a grant higher than 500.000 DKK must have a complaint and response system in place. The obligation to comply to this standard is an integral part of [CKUs Grant Management Guide](#) and is included in all agreements with grant recipients of the CKU Fund and the FoRB-Window.

This guide describes how to establish a complaint and response mechanism at project level.

Who needs protection from abuse and exploitation?

All persons can be exposed to abuse and exploitation, but vulnerable groups are at a higher risk than others. According to the Core Humanitarian Standards, people may be vulnerable because of individual factors such as age, disability or illness, or because they are caring for others who are vulnerable. Social and contextual factors also contribute to people's vulnerability. These include discrimination and marginalization because of low status, gender, ethnicity, class, caste, sexual orientation and religious or political affiliations.

Particular attention should be given to protecting individuals that belong to a combination of these vulnerable groups, for example children with disability or female religious minorities as these will be even more at risk.

The first step when establishing a complaint and response mechanism is to identify the vulnerable groups who are at risk of exploitation and abuse in the project.

When vulnerable groups have been identified the second step is to carry out a risk assessment to help understand where and how vulnerable groups may be placed at risk. The risk assessment should identify times, places and occasions, where project staff or project representatives come into contact with vulnerable groups.



A risk assessment should list WHERE your organization comes into contact with communities and the public. Identify WHO is making contact and WHOM is the contact established with.

For an example of a comprehensive risk assessment see [Organizational safeguarding risk assessment \(live.com\)](#)

What should project recipients be protected from?

Vulnerable groups should be protected from exploitation and abusive behavior. Safeguarding is broader than only encompassing a focus on sexual abuse and exploitation. Safeguarding also includes power abuse in relation to physical violence, discrimination, threats and emotional harm.

The second step is to identify abusive behavior in the organization and projects. After defining abusive behavior, the organization can frame the organization's ethical codex in a code of conduct that all employees are obliged to comply with.

Examples of abusive behavior can be found here:

[IASC Six Core Principles Relating to Sexual Exploitation and Abuse, 2019](#)

[CKU Safeguarding Policy](#)

Who does the code of conduct apply to?

The code of conduct should apply to anyone who is directly working or volunteering with your organization i. e. people who are paid staff members, field staff as well as volunteers. The component should also apply to persons representing the project such as board members, consultants, journalists and sub-contractors who participate in the project.

See examples of a code of conduct:

[CKU - Code of Conduct](#)

[Bond - Safeguarding Code of Conduct](#)

How to file a complaint?

A complaint and response mechanism is a formalized mechanism that provides safe, accessible and effective channels for individuals and the wider community to file a complaint in the event of abuse and exploitation. When setting up channels for complaining it is of vital importance that the mechanism is accessible by all people despite barriers such as language, literacy, awareness of the mechanism, poverty, distance, or fear of reprisal. Channels can include online and offline reporting tools, email addresses, hot-lines, personal conversations and SMS reporting. The third step is to tailor the reporting mechanism to the needs of the potential users and in this regard special attention should be given to children who might not be able to report for themselves but rely on others to disclose the abuse.

The reporting mechanism should be free of charge and provide a range of contact options. The mechanism should also allow for complaints to be submitted anonymously.

Project recipients and partners should be well informed of channels for filing a complaint. They must know how and where to file a complaint and be informed of who and how the complaint is handled.

Learn more on what to consider when working with children in the below resource:

[Course: Child Safe Organisations - Policies and Practices, Section: Reporting and responding to child safeguarding concerns \(fabo.org\)](#)

How to handle a complaint?

The fourth step is to design the process for handling incoming complaints. The design should consist of the following elements:



Reception

On reception of a complaint, a complaint committee consisting of a Safeguarding officer, person of trust from the board and a designated employee outside of management should initially assess whether the case does or does not require further action. The complaint committee dismisses the case if warranted. If the case requires further action, it must be recorded with a case number and date of complaint and stored in a place that is only accessible for persons within the complaint committee in accordance with GDPR rules.

A focal point - a Safeguarding officer - should be identified in the organization. The Safeguarding officer is leading the complaint committee and taking responsibility in implementation, monitoring and communication of the complaint mechanism.

Investigation

Complaints that are within the scope of the organization's safeguarding policy require a detailed investigation. This includes fact-finding and gathering sufficient information for all involved parties to constitute the best possible decision-making basis. The purpose is to substantiate the complaint. It is important to avoid causing damage to evidence or influencing witnesses in the fact-finding process. The investigation should be done independently, objectively and impartially. During the fact-finding, keep a log of activities and findings in chronological order and store the data securely.

CKU should be notified of all relevant incoming complaints. If the complaint is of a flagrant character or systemic in nature, the complaint should be directed to CKU.



Learn more on how to make an investigation of a complaint through free of charge, online self-paced courses: Investigator Qualification [Traning Scheme - CHS Alliance](#)

INVESTIGATION PRINCIPLES

Confidentiality

Confidentiality is an ethical principle that restricts access to and dissemination of any information. In investigations, it requires that information is available only to a limited number of authorised people for the purpose of conducting the investigation.

Independence

Investigations must be conducted in a fair and equitable fashion. Evidence must be gathered and reported in an unbiased and independent manner to determine the validity of an allegation. The investigator must be free, both in fact and in appearance, from any influence that could impair their judgement. Investigators should make their manager aware of any potential conflicts or influence in order to take action to resolve these issues before commencing the investigation.

An investigation is into an allegation, not a person

The subject of complaint must be treated with respect and afforded the right of response. Investigators must not pass judgment on the behaviour of the victims, witnesses or subject of complaint throughout the investigation. Investigation should be conducted with due consideration and sensitivity to the culture and customs of the local population when interacting with local members.

Respect (for all concerned)

Investigators must be seen to be respectful of all parties to an investigation.

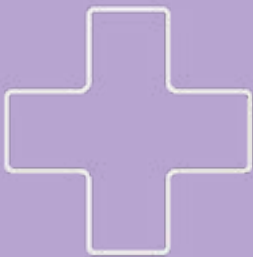
See all Core Humanitarian Standard Alliance's principles [here](#).

SURVIVOR CENTERED APPROACH

It is important to conduct the investigation from a survivor-centered approach where survivors experiences, rights and needs are at the center, and supported throughout the process. The approach helps promote the survivor's recovery and their ability to identify and express needs and wishes, as well as reinforce their capacity to make decisions about possible interventions (UNICEF).

A survivor-centered approach entails:

- » To be treated with dignity and respect instead of being exposed to victim-blaming attitudes.
- » **Non-discrimination** based on gender, age, race, religion, ethnicity, ability, sexual orientation, HIV status and any other characteristics.
- » Receive comprehensive information and involve the survivor in decision-making.
- » **Safety:** in some situations, witnesses are in risk of reprisals, including physical attacks. While an organization may not be in a position to guarantee the safety of a witness, it is essential that a plan is developed and reviewed throughout the investigation for how best to keep witnesses safe. Witnesses must be honestly apprised of the limits of the organization's capacity to protect them.
- » **Health:** In some situation witnesses are in need of medical support to e.g prevent a pregnancy or transfer of HIV or cover other health concerns. The witnesses may also be in need of psycho-social support.
- » **Legal support:** When the complaint falls under criminal law the witness should be offered legal support.



Reporting

Based on the fact-finding process the complaint committee drafts an anonymous report that presents the scope of the complaint and the evidence found during the fact-finding process. The report can entail recommendations for further actions including decisions and sanctions.



See an example of an Incident Report Form:

[Safeguarding Children Incident report](#)

Disciplinary sanctions

The final report is shared with either the director of the organization or the board depending on whom the complaint regards. If the complaint is directed towards the directors of the organization, the report is shared with the board. Either the director or the board takes the final decision on the outcome of the complaint.



See an example of a reporting process:

[Reporting process](#)

LEGALITY

Investigations should be initiated, conducted, and reported in accordance with all applicable rules, regulations, and guidelines including due respect for the rights and privacy of those involved.

If a complaint falls under criminal law, it should be reported to the relevant authorities. It is however recommended to make a risk assessment prior to the reporting in order to assess risks related to corruption and patriarchal cultural perception that may ultimately cause more harm to the witness than already being subjugated to.

How to prevent power abuse?

A complaint and response mechanism is useful in addressing power abuse when incidents happen. However, prevention is key to avoiding power abuse and exploitation. Prevention can be done through the following elements:

Recruitment

Collection of references and police records provides important information when recruiting new staff. Global references can be collected in Inter-Agency Misconduct relocation scheme.

Code of conduct

Develop a code of conduct for the organization and designate all personnel to sign the code of conduct.

Training

Ensure that personnel are aware of the principles and processes of safeguarding and make them familiar with the organization's complaint mechanism and code of conduct.

Monitoring

Quarterly or yearly status of incoming complaints and handling of complaints by the Safeguarding officer. On completion of a CKU funded project, the partner organization will report on the number and nature of complaints and how the organization has responded to the complaints in the completion report. CKU will pay special attention to handling of complaints locally in the event of project monitoring visits.