March 2022



MAP's Community Feedback & Complaints Mechanism policy

Date of latest review: March 2022

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Definitions

Beneficiaries: The individuals, groups, or organisations that directly or indirectly benefit from and engage with an intervention, project, or programme.

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

Complainant: The person who initially notifies MAP or its partners of a complaint/allegation.

Complaint: An expression of dissatisfaction about the standards of service, actions or lack of action by MAP or its staff. It is a criticism that expects a reply and would like things to improve.

Feedback an opinion about MAP's work which may be positive (a compliment), neutral (suggestion for improvement), or negative (a complaint). Being accountable to the people we seek to assist requires MAP to take into account their opinions, concerns, suggestions and complaints.

SEA Sexual Exploitation and Abuse. Sexual exploitation is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. Sexual abuse is the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. This includes non-contact and online sexual exploitation and abuse.

PSEA - Protection against Sexual Exploitation & Abuse (see above)

Safeguarding the health, safety and wellbeing of children and adults, whether direct or indirect beneficiaries, including those at risk of sexual exploitation or abuse, is a core policy commitment of MAP.



March 2022 1. Introduction

Medical Aid for Palestinians (MAP) believes that the communities we work with have the right hold us to account. True accountability to our beneficiaries and communities means they have the opportunity to influence relevant decisions affecting how we work with them. It involves giving communities the power to hold MAP to account in ways that influence the organisation's policies, priorities, and actions at local, national and global levels.

This policy aims to ensure that effective feedback and complaint response mechanisms are established and improved across all our interventions, to strengthen the voice of our communities and beneficiaries and ensure that their views, rights and dignity remain in the frontline of our work.

2. Why feedback is important

For MAP, generating greater accountability allows beneficiaries to hold MAP, its staff, volunteers and partners to account. Accountability processes that are managed effectively help to assess and improve the quality of work, which benefits both MAP and the people we reach. Open channels of feedback and complaints are vital to MAP to improve our work, to learn, and to break down traditional power dynamics when working with communities. As a member of the Core Humanitarian Standard (CHS) Alliance, MAP commits to having an effective feedback and complaints mechanism (CHS commitment 5).

An effective feedback and complaints mechanism gives opportunities to beneficiaries (of all ages, genders and abilities) and partners to influence MAP's programmes and decision making. It enables them to report mistakes or inappropriate behaviours. It promotes community engagement and empowerment and is valued by community members as a platform through which they can exercise voice. Confidence to give feedback increases over time; beneficiaries are then empowered to claim their entitlements and know their rights.

For MAP, feedback and complaints are a source of information that improves our understanding of the contexts in which we work and the complexities, diverse needs and priorities of communities. It helps ensure our interventions are implemented in a way which respects communities and protects their wellbeing and safety. It is a way of engaging, building and maintaining trust with target groups we serve.

Furthermore, it helps us to:

- Detect fraud, corruption, misconduct or sexual harassment, exploitation or abuse early allowing MAP to respond quickly to prevent further instances.
- Support programme monitoring and evaluation
- Detect if a programme is overlooking a specific issue such as gender or disability inclusion
- Avoid waste and duplication of resources.



March 2022 **3. Scope of policy**

This policy covers feedback on MAP's projects and programmes implemented directly and through our local partners. We welcome feedback, whether positive or negative, on MAP's programmes and on our staff, volunteers, contractors providing a service on behalf of MAP, and on our local partners.

MAP staff commit to always operating to a high level of respect, treating all community members with dignity and doing no harm. See MAP's Code of Conduct, annexed at the end of this policy.

3.1 Types of feedback MAP welcomes:

- Community/individual-led feedback individuals decide when and how they give feedback/make a complaint. This may include anonymous feedback.
- Targeted feedback MAP staff and partners will periodically seek feedback on specific project components, services, or issues to improve our programming.

3.2 Who can give feedback?

- A person or community engaged directly or indirectly in a project activity or receiving a service which MAP supports or involved in delivering an activity/service.
- Someone on behalf of a person engaged in a project/receiving a service (friend, family member).

3.3 Categories of feedback:

MAP welcomes feedback on our projects, programmes, services, as well as on our staff, volunteers, contractors, and our work with partners. We encourage feedback on the following categories:

	Category	Example
1	Appreciation/gratitude	
2	Suggestions for improvement/minor dissatisfaction with services/activities	Long waiting times for services, activity cancelled at short notice, missing items in kits/procurement, poor quality items distributed etc
3	Complaint: Major dissatisfaction with services/activities provided by MAP or partner	Discrimination of beneficiaries based on age, religion, gender, disability. Service/activity that has a negative impact on the physical or mental health of beneficiaries.
4	Theft, fraud, corruption, conflict of interest	Misuse of project funds or resources,
5	Breach of MAP's Safeguarding Policy or Code of Conduct, or other misconduct by MAP staff or representatives. Protection issues.	Inappropriate behaviour, abuse, bullying, exploitation, neglect, verbal, physical, emotional or sexual abuse, sexual exploitation of beneficiaries
6	Allegations of misconduct by non-MAP staff/partners/consultants/volunteers	Abuse by other agency staff or community member not linked to a MAP supported project



March 2022 **3.4 What is not covered by this policy:**

This policy does not cover feedback/complaints from suppliers, contractors, staff or volunteers. Concerns from MAP staff and volunteers are dealt with under separate internal policies (Whistleblowing Policy). For information on how to give feedback or make a complaint on MAP's fundraising, communications or campaigns see https://www.map.org.uk/column-3/feedback-and-complaints.

- Feedback/complaints about an organisation which is not a MAP partner, unless there is a safeguarding concern (category 6). Safeguarding breaches by an external organisation/community member will be referred to the local/national safeguarding focal point and resolved according to local guidelines.

- General requests for information

- Requests for additional budget: Unfortunately, there are limits to the services and support MAP can provide. MAP is not able to respond to all requests for additional services and activities.

- Requests for services which are beyond MAP's priority areas:

- Women & child health
- Emergencies and Complex Hospital Care
- Disability
- Mental Health & Psychosocial Support

Requests for information and services which are outside these priority programme areas may need to referral/signposting to other organisations.

4. How to give programme feedback or make a complaint to MAP

It is hoped that most complaints or concerns about MAP's work or behaviour can and will be dealt with informally by our staff. However, we recognise that not all issues can be resolved in this way and that a formal complaints mechanism is required for when an individual or organisation wishes to make their complaint a matter of record and to receive a formal response.

4.1 Direct feedback to MAP

There are several channels through which feedback can be given or complaints made to MAP:

- Email info@map.org.uk in English or Arabic. Mark your email 'programme feedback/ complaint'
- Write to us at:

Gaza: 6th floor, Dream building 1, Al Rashid Street, Gaza

West Bank: 5th floor, Elite Shaltaf Commercial Building, Khalil Abu Raya Street, Al Masyoun, Ramallah Lebanon: 2nd floor Al Salam Building, Adnan el Hakim Street, Jnah, Beirut UK: 33a Islington Park Street, London, N1 1QB

- Each local MAP office has a range of additional channels through which feedback can be given (such as feedback boxes, local phone lines, feedback email accounts, WhatsApp/mobile services). These are communicated to relevant local communities. In addition, MAP staff are available during project activities and services, and encourage community members to speak to them directly.
- See the feedback and complaints page on MAP's website: <u>https://www.map.org.uk/column-3/feedback-and-complaints</u>



March 2022 4.2 Project specific feedback channels through MAP and/or local partners

In addition to MAP's direct Feedback and Complaints channels above, there are project-specific feedback channels. These are developed by MAP and/or our local partners, in consultation with communities and are communicated to the relevant community members, using appropriate methods. Obtaining targeted feedback on a particular service/activity allows us to improve our programming.

5. MAP's approach to handling and responding to feedback and complaints

5.1 Community participation in feedback mechanisms

MAP will ensure equal access and participation of all target community groups including women, men, girls and boys with and without disabilities in the areas where we work; Gaza, West Bank, East Jerusalem, Lebanon.

Participation of community members in the feedback process will ensure that MAP's feedback and complaints mechanisms are made available to all groups considering location, gender, age and disability. Participation is only possible if community members are properly informed.

Community participation can happen at different levels:

- 1. **Consultative:** seeking the views of community groups to increase understanding of their lives and the issues affecting them. It is led and managed by MAP or MAP partners.
- 2. **Collaborative:** community groups working with MAP or partners to make decisions and implement projects. They may collaborate during project implementation in initiatives.
- 3. **Community-led:** community groups are empowered to lead their own projects/initiatives, either individually or as part of their own forums, committees or CBOs. In this case, MAP's role is to facilitate, offer advice and support.

In developing this mechanism, we will adopt at least a consultative or collaborative participatory approach and aim to make elements of the mechanism community-led, where possible.

5.2 Publicizing MAP's Feedback & Complaints mechanism

It is essential that community members and beneficiaries know what MAP stands for and what we can be held account for. MAP programme staff will regularly and systematically provide accessible information on who we are, our projects and achievements, what behaviour people can expect of MAP staff and representatives, and the standards we aim to meet in our programmes. This information might be given through verbal communication, such as speaking to a group at the start of a training or activity, or through written communication such as posters, leaflets, banners and MAP's website.

Armed with this knowledge, it is vital that communities understand how they can provide feedback and complaints if these standards are not being met. MAP will use different methods to regularly communicate our feedback and complaints mechanism, both verbal and written. These communication channels will be developed in consultation with communities and target groups about the most appropriate communication methods for them.

The ways in which MAP communicates our Feedback & Complaints Mechanisms will vary, depending on the nature of the projects/services, and the community members we reach. MAP will ensure communication about our feedback and complaints mechanism is clear, simple and accessible to all the communities we support. MAP staff will regularly attend community activities, services and events to communicate our feedback & complaints mechanism, using sign language when necessary.



March 2022 5.3 An Inclusive & Accessible feedback & complaint mechanism

Through this policy, MAP aims to ensure inclusive and accessible channels of communication with different community groups, including people with different disabilities, vulnerable groups, children and the elderly. Steps should be taken to fulfill this requirement:

- Maintain a diverse set of communication channels that are accessible to different community groups and are gender and age sensitive.
- Refer to a project's needs assessment and gender analysis for in-depth information on genderrelated barriers to engaging with the programme.
- Consider illiterate/low literacy populations when designing BFM, providing visual instructions and use of simple language in communications.
- Prioritise free feedback channels as financial inaccessibility are often exacerbated by gender and disability disparities.
- Have a positive attitude regarding the participation of people with disability including people with intellectual disability, not assuming that they will not participate.
- Ensure consultation with disability organisations during developing the feedback channels.
- Where possible, analyse feedback disaggregated by age, gender and disability and location, to reveal the effectiveness of the BFM and identify potential disparities in accessing/using it.
- Consider the safety and security of all vulnerable groups. Maintain absolute confidentiality of complainants unless agreed otherwise.
- To include a budget in MAP programme for accessibility and inclusion.
- MAP staff should be knowledgeable on MAP's Code of Conduct, Gender, GBV, safeguarding and related policies, and the humanitarian referral system through the protection cluster.
- MAP's BFM teams will include female and male members. This is especially important for staff receiving, investigating and responding to complaints.

Definitions of each group:

- **Minorities**: people who experience relative disadvantage as compared to members of a dominant social group. Minorities have observable differences/characteristics based on ethnicity, race, religion, sexual orientation or disability.
- Young people: adolescents and young people aged from 10 to 24 years of age (WHO).
- **People with disabilities**: those with long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others (CRPD).
- **People with low literacy**: people aged 15 and over who can both read and write a short, simple statement on their everyday life. They require things to be expressed very simply and clearly.

5.4 Safe & confidential

Safety and confidentiality are core to MAP's complaints and feedback handling processes. Complainants can choose to file a complaint anonymously or chose not to provide contact details for follow-up. The complainant's identity will be kept confidential and shared only with the investigation team. Information related to complaints will only be shared on a need-to-know basis. Information related to the complainant will be filed securely in line with MAP's data protection policy. MAP's

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feedback and complaints database will be access restricted. Complainant contact details will not be used for purposes other than providing updates on progress of the complaint and the outcome.

For complaints related to safeguarding or criminal incidents, the complaint handling and investigation may include confidential reporting routes outside MAP, according to local policies and procedures.

5.5 Responding to feedback and complaints – A timely response

Complaints and feedback received will be acknowledged within 3 working days, addressed promptly and in according to MAP's policies and procedures. Depending on the classification, the maximum time limit for responding to feedback or a complaint complies with the terms set out in the SoPs. The complainant will be kept informed on progress (unless it was given anonymously).

MAP aims to resolve the complaint and inform the complainant of the outcome within one month; however, if the issue cannot be resolved in this timeframe, the complainant will be kept informed about progress made. Complainants can provide feedback related to satisfaction with the process and the outcome, and suggestions for improvement. m

Complainants have the right of appeal to the country office Director if they are not satisfied with the outcome of the handling of the complaint/feedback.

Safeguarding complaints

Allegations of a breach of MAP's Safeguarding Policy or Code of Conduct by MAP staff, representatives or partners will be reported immediately to the local safeguarding focal point (Director of local MAP office) and investigation initiated according to MAP's Safeguarding Policy and organisational/local procedures. This may include use of confidential routes of reporting concerns outside MAP (for example, to established PSEA hotline and website in oPt).

6. Resourcing the feedback and complaints mechanism

6.1 Roles & Responsibilities

To ensure MAP's Feedback & Complaints mechanism is responsive, efficient and community centered, it is important it is well staffed, resourced and continuously monitored. Roles and responsibilities related to the construction and implementation of the mechanism will be clarified in the SOPs.

A **Feedback Focal Point** will be identified in each MAP office. This senior member of the Programmes Team will support the local office Director in tracking the feedback and complaints system within the local office, analyzing the data and supporting the Director in reporting.

Data entry: Within each office, staff will be allocated responsibility for entering the feedback/complaint onto the centralised excel database saved on SharePoint.

Follow up and investigation: The relevant programme staff responsible for the project will respond to the feedback/complaint and will support further investigation where required. If the feedback/complaint relates directly to that staff member, an alternative programme staff member will be appointed to investigate. In the case of a safeguarding of PSEA report, all reports will be made to the local Safeguarding Focal Point (Director) who is responsible for investigation.

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Reporting: The Director within each office will be responsible for quarterly summary reports of the feedback and complaints as part of the quarterly programmes report. This will report on agreed MAP-wide indicators to measure the effectiveness and accessibility of the BFM mechanism.

UK Programmes Team: Provide support to the regional offices in monitoring and tracking the BFM mechanism and in responding to feedback, where needed. They will compile regular reports to the Senior Management Team and the quarterly Projects Advisory Panel (PAP) meeting of the Board.

6.2 Staff training

A session will be run for all MAP staff, and regularly run for new starters, to familiarise all staff with the feedback and complaints policy. To foster an organisational culture where feedback is encouraged, it is important that all staff are aware of this policy, even if it does not relate directly to their work.

All field office programme staff, including the Feedback Focal Point in each office, will receive more detailed training on the Standard Operating Procedures for handling feedback. This will cover the processes for recording, storage, analysis of feedback and complaints, and internal MAP reporting, as well as reporting back to communities/complainants. The training will be developed by the Accountability Group and approved by the Senior Management Team.

6.3 Budgeting

Annual operational budgets will include resources required by each MAP office to staff and manage the feedback and complaints mechanism. Operational budget will include the costs associated with various feedback channels, with communicating MAP's BFM to communities and beneficiaries, and the human resources required to maintain the feedback mechanism.

Resources will be included in each project budget to develop and improve project-level feedback channels, including regular face-to-face contact with MAP staff (focus groups, talks at activities etc). Project budget may cover hardware required (mobiles, tablets), printed materials for communicating feedback mechanisms, training for partner staff

7. Learning - How feedback and complaints will be used to improve MAP's work

7.1 Improving MAP's programmes

MAP will use the information provided in the feedback and complaints we receive to make improvements to our programmes, ensuring they continue to meet the needs of the communities we work with. We will do this using a number of different learning mechanisms:

- Regular review meetings by MAP staff in each local office
- Regular review meetings with local partners
- End of project/phase reviews and external evaluations to inform the design of programming
- Discussed at quarterly Programme Advisory Panel (PAP) meetings

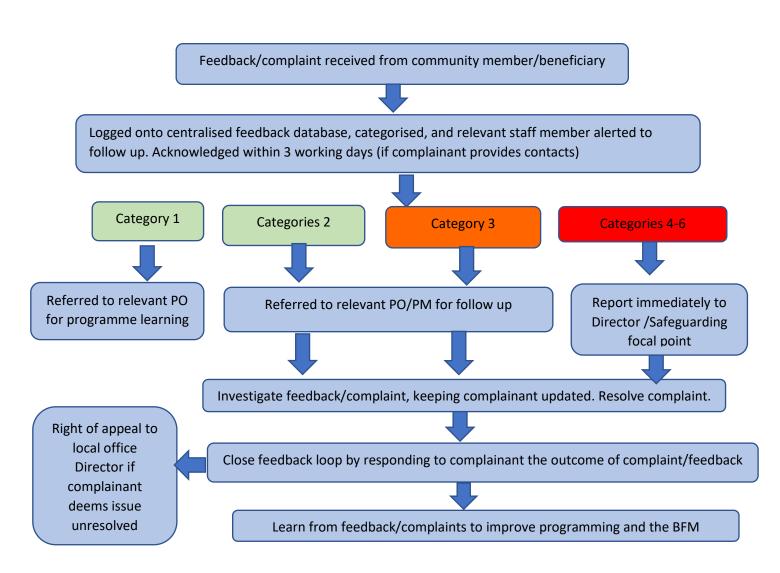


March 2022 7.2 Improving the feedback and complaints mechanism

MAP is committed to monitoring our feedback and complaints mechanism, ensuring it is accessible and effective. We will make improvements as we learn more about how it is being used, through tracking key indicators. Where possible, MAP will capture and report on feedback/complaints disaggregated by location, age, disability status, gender of respondents, to support monitoring of the feedback complaints system. We will monitor that different feedback channels are being used.

8. MAP's process for handling feedback & complaints

The below outlines the process for handling feedback and complaints, detailed in the SoPs.





March 2022 9. Review of MAP's Feedback & Complaints Policy

MAP's feedback and complaints policy and Standard Operating Procedures will be reviewed annually, and adjustments made to ensure they meet the needs of the different communities we serve. The date of the next review is <u>March 2023</u>.

10. Working with partners on their feedback and complaints mechanism

In addition to MAP's own direct feedback and complaints mechanism, we support our local partners to develop and improve their own feedback mechanisms.

MAP is committed to building the capacity of our local partner organisations, this is the second of our three organisational objectives in our strategy (2020-2022): *Enhanced professional, technical and/or organisational capacity of our local programme partners.* This includes supporting our partners to become more accountable to the communities they work with.

MAP conducts a robust Due Diligence process with all new partners and regularly reviews existing partners' capacity assessments. These include reviewing their monitoring and evaluation processes and systems, feedback and complaints procedures including their safeguarding policies and processes. MAP staff work with partners to agree a capacity building plan, based on these capacity assessments. These are routinely tracked in project level log frames, monitoring and action plans, and reported on in quarterly programme reports.

All MAP's partners are required to work towards developing their own inclusive and effective feedback and complaints mechanism, with MAP's support. They are required (through partnership agreements) to report serious complaints, including safeguarding concerns, to MAP immediately. MAP monitors partners' complaints handling processes as part of routine project monitoring.

12. Annexes to this policy

MAP's Safeguarding Policy https://www.map.org.uk/downloads/map-safeguarding-policy-(jan21).pdf

MAP Code of Conduct <u>https://www.map.org.uk/downloads/map-safeguarding-code-of-conduct-(jan21).pdf</u>

Core Humanitarian Standards on Quality & Accountability: <u>https://corehumanitarianstandard.org/the-standard</u>

CIRCULAR PSEA Network oPt: Actions required according to Minimum Operation Standards on PSEA in an Emergency Response

MAP's Feedback & Complaint Mechanism - Standard Operating Procedures (SoPs) (forthcoming)