



# BENEFICIARY COMPLAINTS AND RESPONSE MECHANISM (BCRM) POLICY

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## Beneficiary Complaints Response Mechanism Policy

### 1. Introduction

Human Appeal is a humanitarian and development iNGO working across the globe to strengthen humanity's fight against poverty, social injustice and natural disaster through the provision of immediate relief and establishment of self-sustaining development programmes. Our vision is to contribute to a just, caring and sustainable world free of poverty. Human Appeal does this by raising money to fund immediate and long-term sustainable solutions and empower local communities.

While pursuing its above-stated vision and mission, especially in humanitarian disaster areas, Human Appeal strives to work in a way that is accountable to its beneficiaries. Human Appeal believes being accountable to beneficiaries is essential to adhering to the Core Humanitarian Standard (CHS) for improving the Quality and Accountability of humanitarian programmes.

To this end of improving accountability, Human Appeal has developed a Beneficiary Complaints and Response Mechanism (BCRM) Policy, which applies to all Human Appeal programmes at all, stages (from inception to conclusion including design stage ideally).

### 2. Definition of BCRM

We define a BCRM as a two-way channel established in each programme that gives beneficiaries a means of voicing complaints, concerns and feedback to Human Appeal. The guidelines (in a separate document) lay out the framework of how a response is provided with regards to Human Appeal's programmes within the control of the agency.

### 3. Policy Objective: improve our programmes by being open to beneficiary input

Human Appeal is striving to meet the highest quality in its humanitarian and development projects and seeks to work with the affected populations in the best way possible in an open and responsible way that builds trust and respect.

To improve our work, we are interested in what the beneficiaries have to say, whether this comes in the form of a comment, a compliment or a complaint. Human Appeal is committed to establishing a system that gives individuals and groups the possibility to report complaints or suggestions to Human Appeal securely and receive a response in a timely manner.

We recognise that having a well-designed and managed mechanism for dealing with beneficiary complaints can improve the quality of our work<sup>1</sup>, specifically:

- Effectiveness (i.e. is the intervention achieving its objectives?)
- Relevance (i.e. is the intervention aligned with the needs of beneficiaries.)
- Sustainability (i.e. will the benefits last?)
- Enhance the trust and confidence of our beneficiaries
- Empower the community by giving them a voice in programming
- Help us recognise areas of our work that need to be improved
- Ensure that Human Appeal learns from the feedback provided through this process

- There is evidence that BCRM can improve programme quality see p23 from <http://feedbackmechanisms.org/public/files/Christianaid.pdf>
- Ensure transparency which decreases the risks of corruption and safeguards the beneficiaries
- Enhance accountability and reduce the risk that one of our staff becomes the perpetrator of misconduct or sexual exploitation or violates any other issue for which Human Appeal has a zero-tolerance policy

The objective of this policy and guidelines is to ensure that beneficiaries are able to complain at all stages of programme implementation. The process enables beneficiaries (should they wish) to lodge complaints in a fair, consistent and accessible means. It also provides a platform to give feedback to Human Appeal regarding its programmes. This includes reporting sensitive allegations such as corruption, misconduct, sexual exploitation and/or abuse by any staff member of Human Appeal. This policy and its guidelines are developed to ensure an organisational culture in which complaints are both welcomed and addressed.

#### 4. Policy Statement

Thus, as a matter of policy at Human Appeal, we consider that:

1. **We are responsible for incorporating a BCRM (Beneficiary Complaints and Response Mechanism)** in all of our programmes, which is well documented, systematically passes information to project staff and provides a confidential pathway for beneficiaries to complain and/or provide negative or positive feedback.
2. **We are responsible for ensuring that beneficiaries consider our BCRM visible, accessible, safe and convenient** especially vulnerable and marginalised groups.
3. **We are responsible for making our beneficiaries aware of our BCRM.**
4. **We are responsible for listening** to the complaints, needs, concerns and feedback of our beneficiaries, the communities that we serve and other stakeholders (supporters, partners etc.).
5. **We are responsible for taking appropriate actions based on what they are telling us**, resolving issues and maintaining a culture in which beneficiary complaints are taken seriously and acted upon. If a complaint cannot be addressed by Human Appeal, we will refer those complaints to a relevant service provider.
6. **We are responsible for ensuring results are fed back to the complainants** within the stated period based on the severity of the complaint.
7. **We are responsible for being open to appeal** in case of dissatisfaction with the outcome.

Human Appeal will work to ensure that we are meeting these seven responsibilities in each one of our programmes. Complaints should be logged in a centralised database and analysed for trends to inform Human Appeal about the efficacy of internal controls and how to improve them.

Furthermore, Human Appeal recognises that for complaints to be effective, the beneficiaries need to be aware of their rights and the behaviour that they can expect from Human Appeal staff. This includes

our organisational commitment to treat them with dignity and prevent abuse and exploitation in any form.

For this to be possible, Human Appeal recognises that making the community aware of what it can expect from us must be part of our initial consultations with them during project design and inception. In these consultations, which include participation from different groups, we will take the community's input on:

- What is the best method for submitting complaints?
- The needs of people of different groups (age, sex, disability, marginalised groups, people in poverty etc) to access BCRM
- Decide what is the best method for the community to receive a response to their complaints
- What factors may deter individuals from making a complaint (especially around corruption, sexual abuse or other misconduct) and how they may be mitigated?

Internally, Human Appeal will ensure that its staff are trained on the BCRM and have a formal system in place with clear roles and responsibilities about how complaints are to be routed and addressed, in what timeframe and with what action dependant on the severity of a complaint.

## 5. Fostering a conducive culture – safe to report

Fostering a culture where staff, partners and beneficiaries all feel safe to report and complain without hesitation or fear or retaliation. HA aspires to have a culture where complaints from beneficiaries in particular are both welcomed and addressed.

Human Appeal will seek to protect the complainants from breaches of privacy. This includes protecting whistle-blowers, people making allegations of sexual misconduct, corruption, abuse, exploitation or other misconduct.

All complaints will be treated with strict confidentiality. However, there are specific circumstances under which information may need to be disclosed to a third party. These include, but are not limited to, instances of criminal activity, violations of international law, and incidents of Sexual Exploitation and Abuse (SEA), Sexual and Gender-Based Violence (SGBV), or fraud. In such cases, we may have a legal obligation to share information with relevant authorities.

Disclosure of personal data to third parties will only occur if there is a legal basis for doing so, as outlined by the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

In addition, while complaint and feedback handling procedures are decentralised within our various country offices, regular monitoring and spot-checks of these is undertaken by the UK office.

*Please refer to Human Appeal's Beneficiary Complaints Response Mechanism (BCRM) Guidelines for more information and guidance on implementation as well roles and responsibilities.*

## 6. Policy Scope

- This policy applies to all Human Appeal’s project/programmes and country operations.
- This policy will cover complaints, feedback, comments, etc. from all project beneficiaries.
- This policy is applicable to complaints and feedback only on areas relevant to Human Appeal’s programmes and within the control of the agency.
- Should a complaint be reported that falls outside the scope of HA, HA works closely with other relevant organisations and actors to ensure that complaints are referred appropriately and safely for all parties involved in a complaint. BCRM Guideline outlines step-by-step guidance to develop a referral mechanism, taking into consideration of local contexts in country.
- This policy will apply to whole project life cycle. It will cover the duration of project implementation as well as project design phase where applicable (for instance, during community consultations as mentioned in the policy). Even after project completion, HA will continue to welcome and respond to feedback and complaints from beneficiaries over the long term. For this purpose, HA will maintain a channel of communication such as email, phone or mail for beneficiaries to reach out.
- If you are unhappy with how we have dealt with your request, please note the support provided by the following external bodies:
  - If you have a complaint about fundraising, the Fundraising Regulator can help. As the regulatory body of fundraising in the UK, they can investigate potential breaches of the standards outlined in the Fundraising Code (<https://www.fundraisingregulator.org.uk>)
  - CHS Alliance accepts complaints against its member organisations who fail to apply their own commitments and/or the principles and commitments of the Core Humanitarian Standard ([complaints@chsalliance.org](mailto:complaints@chsalliance.org))
  - For any other serious concerns please contact the Charity Commission (<https://www.gov.uk/government/organisations/charity-commission>)
- Complaints about HA staff members will only be dealt with under this policy if the complaints concern staff who are carrying out their working duties of HA. HA will not be responsible for conduct or behaviour by its staff outside of their working duties, for example in the course of their private lives, or in employment outside of HA. Staff on overseas missions may be representing HA outside of normal working hours.
- HA is not an independent authority of investigations. Where a complaint is made in respect of an HA employee that relates to activity outside of their HA working duties and responsibilities but does raise a concern in respect of that employee which is relevant to their role/duties, then HA will consider taking appropriate action and making appropriate referrals to relevant social or law enforcement agencies as may be necessary.

## 7. Policy Review

This policy will be reviewed on a bi-annual basis to ensure continuing appropriateness.