



Complaint and Feedback Mechanism Policy
CO «CF «ADRA Ukraine »

Complaint and Feedback Mechanism: Definition, Purpose, Key Concepts, Classification

The Complaint and Feedback Mechanism is a set of procedures and tools that provides stakeholders, primarily beneficiaries and people who have sought assistance from ADRA Ukraine programs, with the opportunity to freely express their complaints or concerns that will be impartially reviewed based on the established rules and principles. This mechanism provides a secure, accessible, efficient, and, if necessary, anonymous communication channel between communities and ADRA Ukraine. Through this channel, ADRA Ukraine can collect data, receive feedback and complaints, provide the community with information support, implement protection measures, and share comprehensive reports on the resolution of incidents.

The purpose of the Complaint and Feedback Mechanism is to ensure that the organization is fully accountable to all stakeholders by allowing them to share suggestions, positive feedback, complaints and concerns about the organization's activities. A well-designed and functioning complaints mechanism contributes to building trust to the organization from communities, donors and other NGOs, and serves to collect additional data to evaluate the performance, identify weaknesses and potential improvements.

- **Feedback** is an appeal, statement or concern which is related to the actions of the organization or its partners, the behaviour of its employees or the staff of its partners.
- **Complaint** is a message from any person who believes they have been negatively affected by the actions of an organization or that the organization has failed to fulfil a stated obligation. Complaints can relate to insensitive issues (such as dissatisfaction with the organization's assistance distribution) or sensitive issues (such as fraud, corruption, abusive behaviour or sexual exploitation).
- **Suggestion** is a communication from any person that contains a recommendation or advice aimed at improving the organization's activities.

Any member of the community where the organization operates can share their feedback, complaints and suggestions. Therefore, it is important that all members of the community are aware of existence of the organization's CFM and possible channels for communicating their feedback, complaints and suggestions, and have access to the feedback mechanism, regardless of age, gender and abilities, including the most marginalized populations.

The table below outlines the categorization of feedback and complaint types.

Type	Category	Description	Example
Feedback	0	Informative interaction	• Requesting information about ADRA Ukraine's activities and services offered in various components • Updates about the situation in the country, new emerging needs, etc • Expressing appreciation
	1	Assistance request	• Requesting assistance or the extra assistance related to ADRA Ukraine's activities
	2	Dissatisfaction with provided services	• Poor quality, poor communication or delays in provision of services
Complaint	3	Minor violation	• Minor physical and/or psychological effect on employees, beneficiaries, community members and third parties
	4	Moderate violation	• Limited physical and/or psychological effect on employees, beneficiaries, community members and third parties (minor psychological trauma) • Minor implications for the current project implementation • Low legal risks for the organization
	5	Serious Violation	• Significant legal risks faced by the offender • The incident may create a threat for the organization
	6	Critical Violation	• Critical physical and/or psychological effect (death, abduction, sexual assault, sexual exploitation, etc) • High legal and/or reputational risks for the organization

Guiding Principles of Feedback Mechanism Use

Availability

The feedback process should be an effective mechanism that is accessible to all stakeholders in the areas, where the organization operates, regardless of their age, gender, or abilities. In order to comply with this principle, all stakeholders should be sufficiently informed about the possibility of providing feedback regarding the organization's work. The feedback channels should be convenient and readily accessible for any populations.

“Do No Harm” Principle

When providing the assistance, the organization must avoid any harm that potentially may result from its actions or a failure to act. For the purpose hereof, the harm shall mean any physical or psychological damage caused to a person or a group of persons, as well as any damage caused to the environment (economic, social, political, climatic, etc.) that could affect such persons or groups. ADRA Ukraine's feedback mechanism is an integral part of ongoing monitoring and analysis to track potential risks arising in the organization's area of operation.

Personal Data Protection and Confidentiality

Confidentiality helps to create a safe space in which people are more likely to express their opinions, concerns and report cases of abuse or misconduct. People cannot raise concerns or complaints if they fear retaliation from the organization, partner staff or any other stakeholder. The personal data protection process ensures that any data collected by the organization are accessible to a limited number of employees responsible for reviewing and resolving the complaint or concern, and the fact that the complaint or concern was submitted through the feedback mechanism will not in any way affect the attitude towards the person who submitted the complaint or suggestion and will not prevent such person from receiving assistance from ADRA Ukraine in the future. The organization guarantees anonymity, protection and security to everyone who submits a

complaint or expresses a concern. ADRA Ukraine's CFM-mechanism provides for the possibility of anonymous communications, and the procedure for processing, escalation and resolution of incidents includes all appropriate data security steps and access to personal data by the minimum required number of staff members.

Transparency

Each person who files a concern or complaint is guaranteed attentive and respectful treatment. Each appeal must be recorded and processed within a specified timeframe, and the person who submitted the appeal has the right to receive updates regarding the review progress and the results.

Accountability

The availability of objective and accurate documentation is of critical importance for the organization. Any communication (e.g. feedback, complaint or suggestion) must be stored in a secure database. Any information regarding decisions made following the review process must be stored in the same database and can be used for accountability purpose to report to communities, donors and other stakeholders in the form of non-personalized statistical data.

Implementation of ADRA Ukraine's Complaint and Feedback Mechanism

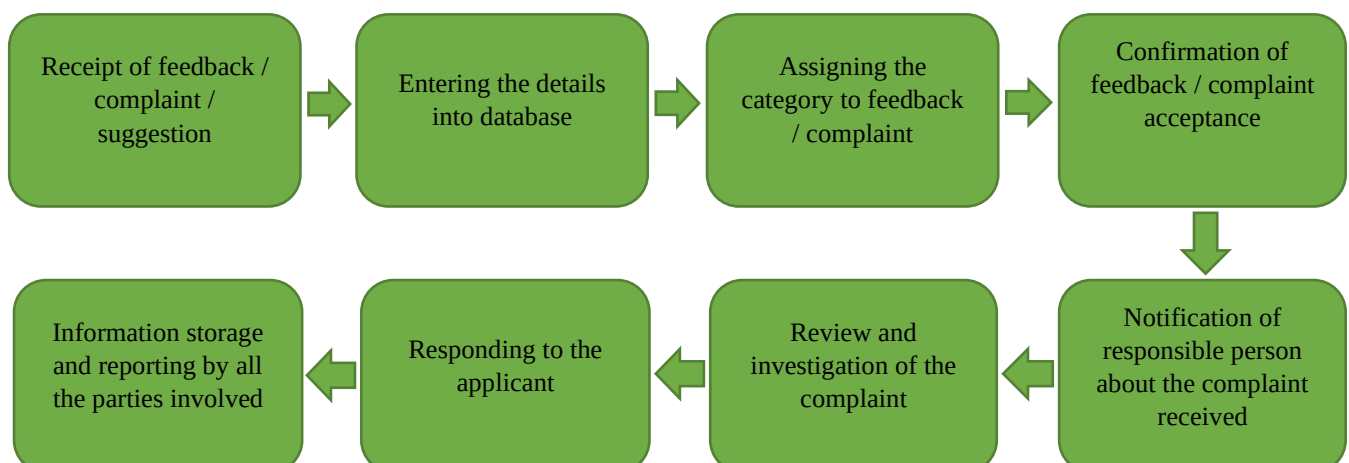
ADRA Ukraine collects feedback and complaints at all stages of the project implementation. Stakeholder feedback collection starts from the moment the direction of activity is determined and continues during the preparation of the potential beneficiaries list, the assistance distribution, and after completion of the activities. Such comprehensive approach provides the opportunity to identify and address any issues and violations throughout the entire life cycle of the project.

Complaint and Feedback Filing Process

ADRA Ukraine accepts feedback, complaints and suggestions through three channels, the use of which ensures the availability of the feedback mechanism to all stakeholders, namely:

- Hotline phone number
- Online feedback collection using the Microsoft forms
- Email for complaints and feedback

Each received complaint is processed according to the workflow shown on the diagram below:



1. Receipt of feedback/complaints: any stakeholder can submit a complaint by calling the ADRA Ukraine's hotline at +380731707271, by filling out the Microsoft form available at <https://forms.office.com/e/ubQAiA5wAR> or send an email with the description of the appeal at feedback@adra.ua. If a complaint is received through any other channel (a comment on social media, oral communications with ADRA Ukraine's representatives or partner organizations, etc.), a person submitting the complaint should be offered to use one of the above-mentioned feedback channels.
2. Entering into the database: each feedback/complaint should be recorded in the approved database. If a complaint is received through the hotline, the responsible employee of the MEAL Department's call center should enter all the information received from the applicant into the database. The responsible employee of the MEAL Department's call center should upload the received feedback/complaints to the approved database for further processing on a daily basis.
3. Setting the category to feedback / complaint: each feedback is analyzed and, based on the information received, a relevant category is assigned to it according to the above classification system.
4. Confirmation of feedback/complaint acceptance: if a complaint is received through the hotline, an applicant should verbally consent to recording of the complaint by the responsible employee of the MEAL Department's call center and commit to cooperate in case if any additional data or clarifications are needed during the investigation of the complaint. If a complaint is received through online form, an applicant should agree and acknowledge that the responsible employee of the MEAL Department may contact him/her for additional data or clarifications, where applicable.
5. Notification of a responsible person about a complaint received: if resolution of the complaint received requires involvement of a responsible employee who is not a member of the MEAL Department (e.g. Program Director, Project Manager, Project Coordinator, PR department employee, etc.), such person shall be notified, and the information about the complaint should be provided to him/her without specifying the personal data of the applicant. The information about the ADRA Ukraine employee to whom the complaint was escalated, as well as the date of escalation, is recorded in the CFM-database.
6. Review and investigation of a complaint: if communication is classified as feedback (i.e. falls under the category 0-2 according to the feedback type categorization), the decision on the feedback may be made without any further investigation. Feedback that is classified as a complaint (i.e. falls under the category 3-6 according to the feedback type categorization) requires additional investigation and monitoring by ADRA Ukraine's management. In order to resolve the problem, the MEAL Department employees may take a number of steps leading to the complaint resolution. Since the MEAL Department employees have access to all information regarding the activities of ADRA Ukraine, the MEAL Department can resolve the majority of complaints independently. If necessary, a responsible person who is not an employee of the MEAL Department may be involved in the review process. In case the complaint requires resolution at the highest level of the organization, the Program Director of ADRA Ukraine is involved in the complaint review and decision-making process. The complaint review process should not take longer than 7 business days after the date of the feedback registration. If the complaint review deadline is exceeded, a justification for the increased time for decision-making must be provided.
7. Responding to the applicant: upon completion of the investigation into the complaint received, a responsible employee of the MEAL Department's call center shall notify the applicant regarding the decision made. In doing so, the employee of the MEAL Department's call center must also inform the applicant that he/she has the right to appeal against the decision made. If the applicant contests decision, the investigation must be resumed, and the validity of the complaint and the decisions made must be reviewed by the ADRA Ukraine's Program Director. If the applicant does not contest the decision, the investigation is considered to be completed and the issue is deemed resolved. The status of the issue recorded in the CFM-database is changed to "resolved", and the number of days it took to resolve the issue is automatically calculated based on the feedback receipt date and the issue resolution date. The resulting statistics may be further used for internal process evaluation at ADRA Ukraine.
8. Information storage and reporting: each feedback must be registered in the feedback database and analyzed by the MEAL Department staff. Feedback, suggestions, and insensitive complaints may be shared at various

levels of the organization to ensure continuous learning, improvement of the ongoing projects, and flexible adaptation of projects to the current needs of the community.

Referral Mechanism for Complaints and Feedback to Clusters

This section of the Complaint and Feedback Mechanism (CFM) Policy of ADRA Ukraine outlines the procedure for referring feedback and complaints, which are not related to operation of ADRA Ukraine's projects/programs; particularly those of a sensitive nature, including Sexual Exploitation and Abuse (SEA), based on the Inter-Agency Standing Committee (IASC) guidance, particularly *Humanitarian Country Team (HCT) Inter-Agency Referral Mechanism for Allegations of Sexual Exploitation and Abuse in Ukraine*, to the appropriate humanitarian coordination bodies (e.g. humanitarian actors) and clusters.

- ADRA Ukraine maintains diverse, safe, and accessible channels for collecting feedback and complaints as it was mentioned in the section *Implementation of ADRA Ukraine's Complaint and Feedback Mechanism* of this Complaint and Feedback Mechanism (CFM) Policy of ADRA Ukraine.
- Sensitive complaints (Categories 5 and 6 of the Complaint and Feedback Mechanism (CFM) Policy of ADRA Ukraine) that are not related to ADRA Ukraine's operations but involve protection or SEA concerns are handled with strict confidentiality and in accordance with a victim/survivor-centered approach, as outlined in ADRA Ukraine's Safeguarding and Protection Strategy.
- Complaints related to SEA or serious protection concerns, which are not related to operation of ADRA Ukraine's projects/programs, must be referred to the Inter-Agency Protection from Sexual Exploitation and Abuse (PSEA) Network via the referral email: seareferral@un.org.
- ADRA Ukraine staff responsible for receiving and processing complaints and feedback are trained in complaint handling, confidentiality, and the referral process, ensuring that procedures are carried out safely and appropriately. These staff are also trained to act in accordance with the victim/survivor-centered approach, as defined by the Safeguarding and Protection Strategy.
- If the complaint, which is not related to operation of ADRA Ukraine's projects/programs, relates to a different sector (e.g. GBV, child protection etc.), it should be referred to the relevant cluster or sub-cluster via established coordination channels.
- Beneficiaries are informed about available feedback channels, including the nature of each and their right to report sensitive cases anonymously via all the official and non-official channels.
- Referral complaints, which are not related to operation of ADRA Ukraine's projects/programs, to clusters to the extent possible must avoid any actions that could jeopardize the safety or dignity of the complainant.
- All referral complaints, which are not related to operation of ADRA Ukraine's projects/programs, must be documented (non-personalized, anonymized where necessary) and tracked to ensure response and accountability.
- The data of the referral complaints, which are not related to operation of ADRA Ukraine's projects/programs on other humanitarian actors, received via ADRA Ukraine's CFM channels will be transferred to the relevant parties (humanitarian coordination bodies (e.g. humanitarian actors) and clusters according to ADRA Ukraine Data Protection Policy.

Implementation Form

ADRA Ukraine's complaint and feedback storage mechanism is implemented in the form of a database. The database template can be found [here](#). The information contained in the database includes:

- Unique appeal number, which is generated automatically and used to protect the personal data of an applicant;
- Feedback/complaint receipt date;
- A channel through which the appeal is received;
- Data of a responsible employee registering the appeal;
- Last name, first name and patronymic of the applicant;
- Year of birth and age of the applicant;
- Gender of the applicant;
- Contact phone number of the applicant;
- Category of the applicant (i.e. beneficiary – if the applicant has ever received the assistance from ADRA Ukraine. Non-beneficiary – if the applicant has never received the assistance from ADRA Ukraine)
- Type of the appeal (feedback, complaint, suggestion);
- Type of assistance concerned (cash assistance, food kits, hygiene kits, transportation services, etc.)
- Additional information about the assistance concerned;
- Oblast and settlement where the applicant is located or assistance is provided;
- Date of occurrence of the issue described in the communication;
- Detailed description of the communication contents;
- Name of the project concerned;
- Feedback category according to the above categorization;
- Date of the feedback acceptance or forwarding to a responsible ADRA Ukraine's employee who is not a member of the MEAL Department;
- Data of responsible ADRA Ukraine's employee who is not a member of the MEAL Department;
- Current status of the feedback review (in progress - if no decision has been made; resolved - if the issue has been resolved)
- Issue resolution date;
- Number of days spent on the feedback review process;
- Description of the actions taken to resolve the issue;
- Any additional information or comments.

The database allows ADRA Ukraine to implement the feedback registration process ensuring that the data are complete, adequate, relevant, not excessive and fully consistent with the purposes for which they are collected. In addition, the developed database allows to structure the information received, which facilitates its classification, processing and analysis for further use.

Access to the complaints and feedback database is restricted and is granted only to employees of the ADRA Ukraine's MEAL Department or the Program Director in order to ensure the data security.

CFM Team Employee Standards

Employees responsible for working with persons submitting feedback or complaints to ADRA Ukraine must undergo preliminary training facilitated by ADRA Ukraine's MEAL Department Coordinator. The training includes communication skills to be used when interacting with applicants in line with the basic humanitarian principles, as well as algorithm for processing feedback and complaints in compliance with all applicable requirements, including confidentiality and data privacy requirements. Such employees also must be familiar with ADRA Ukraine's policies governing the organization's interaction with all stakeholders, in particular, the ADRA Information Disclosure Policy, ADRA Ukraine Communication Guidelines, Anti-Fraud and Corruption Policy, etc.

In addition, competencies of personnel recruited for this task must meet the key competency requirements for employees engaged in operation of feedback collection and processing process, namely:

1. Excellent active listening skills:
 - 1.1. Ability to actively listen to ideas and opinions of others;
 - 1.2. Facilitation skills: ability to lead discussions and encourage others to share their thoughts and express their ideas clearly;
 - 1.3. Inclusiveness: ability to work with colleagues, partners and beneficiaries with different backgrounds and skill levels; ensure fair and unbiased treatment of different people's points of view;
 - 1.4. Gender sensitivity: understanding of inadmissibility of biased attitudes and their impact on stakeholder engagement; ability to take into account and respect differences in gender and social background;
 - 1.5. Ability to recognize and manage or mitigate one's own bias.
2. Ability to respond to feedback in the most appropriate and sensitive manner:
 - 1.1. Empathy: willingness to accept a point of view that differs from one's own; ability to communicate openly; ability to perceive and understand emotions, feelings and experiences of other people; ability to put oneself in another person's shoes, empathize and show understanding of their state;
 - 1.2. Optimism and stress resistance: ability to maintain a positive attitude in the face of criticism and unreasonable or unrealistic demands;
 - 1.3. Humility: ability to objectively assess one's capabilities and actions; willingness to admit one's mistakes or limitations;
3. Ability to quickly make decisions and respond flexibly to changes in communication:
 - 3.1. Learning and adaptation: willingness to improve own skills; perceiving own mistakes as an opportunity to address weaknesses and improve; willingness to learn and openness to new knowledge;
 - 3.2. Accountability: understanding responsibility for own decisions and actions; openness and willingness to explain own actions to others, especially in situations where it is important for the interests or trust of the parties;
4. Confidentiality:
 - 4.1 Adherence to the strict principles of protecting confidential information and treating others with a sense of trust and responsibility; understanding the importance of preserving and protecting stakeholders' personal data; adherence to strict ethical standards in communication and decision-making.

Approved by the Minutes № 33
of ADRA Ukraine ADCOM Meeting
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President of CO "CF "ADRA Ukraine"



Leonid Rutkovskyi