Mitigating risks of abuse of power in cash assistance

TOOLS: Tips to set up a functional complaints and feedback mechanism and referrals

KEY ACTION
Ensures Complaints and feedback mechanisms are designed in consultation with affected people to adhere to their preferences; are accessible to diverse groups of men, women, boys and girls; are confidential and well-functioning. Ensure cash recipients trust to make a complaint or provide feedback without fear of retaliation or of losing their entitlement. Ensure Complaints and feedback mechanisms include a range of communication channels to match people’s preferences: a toll-free hotline may be one channel but not the only one. All the channels must be integrated and clear SOPs should outline the responsibilities of each stakeholder and referral pathways. Ensure that issues are resolved timely and feedback analysis translates into operational changes.

GUIDANCE: WFP Minimum Requirements Checklist for a Functioning CFM

What is in this tool?
The checklist introduces the minimum requirements for a Complaints and Feedback Mechanism to be considered functional.

How?
You can use this simple checklist to review the structure and processes of your Complaints and Feedback Mechanism.

When?
At the project inception stage. This document will help guide the design and planning of the CFM.

WFP Complaints and Feedback Mechanism (CFM)
Minimum Requirements Checklist

Why Complaints and Feedback?
In 2017, WFP re-committed to ensuring accountability to affected people through the adoption of the updated Inter-Agency Standing Committee (IASC) Commitments to Accountability to Affected People (IACP).

Complaints and Feedback Mechanisms (CFMs) are one of the main elements and represent a participatory approach to the humanitarian response and a rights-based approach to development work, and to grounded in the principles of accountability, transparency, equality and non-discrimination.

WFP applies these approaches to its work because they are fundamental to achieving a world of zero hunger for all women, men, girls and boys with or without disability.

What is the concept?
Operational, WFP’s CFM commitment is put into practice by providing two-way communication avenues that allow:

1. Community to express concerns, lodge complaints, ask questions, and provide feedback on WFP programmes through formalised complaints and feedback mechanisms (CFMs), and;
2. WFP to close the loop on feedback and complaints and to achieve a high first-time resolution (FTR) through the CFM.

What do I need to do?
For your CFM to be functional, it must:
1. Be supported by senior leadership and staff,
2. Be designed, implemented and evaluated in consultation with affected people, and other stakeholders,
3. Be accessible, known and trusted, with the aim of closing the feedback loop on all actionable cases,
4. Have a defined purpose, be sustainable and include an exit plan,
5. Ensure confidentiality and data protection policies are applied and understood, conducting a Privacy Impact Assessment (PIA) as part of this process,
6. Have an information management system in place to support the functioning of the Customer Relationship Management (CRM) tool(s),
7. Tap into existing or, in their absence, establish referral pathways (both internally within WFP and externally with partners), including for the management of high priority cases,
8. Have a dedicated and appropriate staffing structure,
9. Enable documented informed decision-making and programme adjustments, and avoid conflict of interest,
10. Ensure functionality of the CFM is regulated by standard operating procedures (SOPs), including monitoring, quality assurance and consistency.
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WFP Complaints and Feedback Mechanism (CFM)
Tips & Tricks for a Functional CFM

**BUY IN IS ESSENTIAL**
Give a short presentation to all staff to highlight why community data is important and that it is part of our mandate. Involve everyone from the beginning, so that they will take time to answer community feedback later.

**DO YOUR HOMEWORK**
Implement focus group discussions (FGDs) and conduct surveys to set a baseline to inform your efforts in the communication ecosystem in local society; do not exclude vulnerable groups and ensure your mechanism is equipped for various protection issues such as sexual exploitation and abuse (SEA).

**TEAM UP AND PLAN**
Get a minimum number of people dedicated to the CFM and try to lobby for support from other units/sections. Ensure an easy way to present your SDP and workplan ready.

**H ave A FOOL-PROOF SYSTEM**
Support your feedback cycle with a robust software solution (or package) that will facilitate how information flows within the team and to external partners (e.g., WFP/IRC).

**CHECK YOURSELF**
Make a list of performance indicators you wish to evaluate the mechanism against. Ensure the evolution of your CM is sustainable, and that you have a plan to handover to a local custodian when the response winds down.

**RAISE AWARENESS**
If you involve the community from the start, reinforcement of your presence should be less challenging. Regularly touch base with target population groups to build trust and ensure access to the CFM. stupid rumors or negative sentiment by passing false information.

**FORGE PATHWAYS**
Get in touch with key partners, working groups, and coordination bodies and find a point who can help gather feedback on referred cases. Make sure all of your Protection issues are covered and that these cases are responded to with extra efficiency and care.

**STAY CONFIDENTIAL**
Educate CM partners: staff and users about their rights to confidentiality in participating in the CFM process. Stand your ground in managing the expectations of communities for cases where identity needs to be protected.

**GATHER FEEDBACK ON YOUR FEEDBACK MECHANISM**
Send out perception surveys to your key stakeholders (and the includes your teams). Aim to gauge user satisfaction on at least ten percent of all cases received by your CFM.

**GET BACK TO BASE**
Let communities know how their feedback has impacted the programme. Inform them of relevant changes; adjustments and keep discussion ongoing through participatory approaches. Remember to pay extra attention to those more vulnerable.

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**Do You Have a Complaint? Seek Redress**

Call the toll free help line
0800 210 210 (WFP)
0800 323 232 (UNHCR)
or Visit the Litigation Desk

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**Para reportar abusos na ajuda humanitária, ligue para a Linha Verde 1458**

Não se paga a chamada
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GUIDANCE: WFP CFM Guidance: Tips for Designing, Planning, Implementing and Evaluating your CFM

What is in this tool?

This document provides a comprehensive guide to conceptualising, planning for and implementing your complaints and feedback mechanism at the country level. The guide includes key definitions and concepts, outlines the minimum requirements for operationalising a functional CFM as well as recommendations for streamlining complaints and feedback into the country operational and programme cycle.

How?

This guidance will help you ensure the effectiveness of the CFM that you’re setting up or already have in place and maximise the opportunity to build trust with affected populations through the CFM.

When?

At the project planning and design stage.

Key points to keep in mind when setting up a CFM:

- An effective CFM will contribute to improved decision making and programming, which in turn will build greater trust between an organisation and its stakeholders.
- The design of a CFM should reflect a range of communication channels depending on the preferences of the crisis-affected people.
- While a CFM should be established as early as possible in the programme cycle, it is important that it is operational before targeting begins so as to offer an avenue for complaints around any exclusion and inclusion errors.
- The complaints and feedback data that is collected should be consolidated and anonymised and shared regularly with key stakeholders including senior management, FSPs and cash recipients in order to adapt and improve ongoing assistance and build trust in the CFM.

TOOL: UNHCR’s Operational Guidance on Accountability to Affected People (AAP)

What is in this tool?

The Operational Guidance on AAP includes a section on feedback and response mechanisms (see pp. 24-37) that helps you establish systems to hear directly from persons of concern, have a real-time understanding of the protection risks they face, and gauge the impact of protection, assistance, and solutions programmes.

How?

This guidance details how to establish and promote feedback and response mechanisms, offers recommended implementation steps, and lists tools that can be contextually adapted to implement what is introduced in this guidance.

When?

At the project planning and design stage.

The Feedback & Response section of the Operational Guidance focuses on:

- Establishing multiple communication channels tailored to the different needs and capacities of persons of concern, including for example, children, older persons, and persons with disabilities;
- Using confidentiality safeguards to ensure that matters such as sexual exploitation and abuse (SEA) are handled in a protection-sensitive manner;
- Having standard operating procedures (SOPs) for the collection, acknowledgement, assessment and referral of feedback, and for the operational response to it, setting out roles and responsibilities.
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**TOOL: WFP CFM SOP Template**

<table>
<thead>
<tr>
<th>What is in this tool?</th>
<th>This tool is designed to support a country office design SOPs for a CFM.</th>
</tr>
</thead>
<tbody>
<tr>
<td>How?</td>
<td>The SOP template can be used as a guide to develop comprehensive and detailed SOPs for your Complaints and Feedback Mechanism.</td>
</tr>
<tr>
<td>When?</td>
<td>At the project planning and design stage.</td>
</tr>
</tbody>
</table>

**TOOL: WFP Privacy Impact Assessment Template**

<table>
<thead>
<tr>
<th>What is in this tool?</th>
<th>This tool supports country offices with the implementation of a privacy impact assessment (PIA) in order to map data flows, access and associated risks. Before a CFM is set up, it is mandatory for WFP country offices to carry out a PIA.</th>
</tr>
</thead>
<tbody>
<tr>
<td>How?</td>
<td>It is recommended to carry out this assessment before establishing a CFM or prior to linking a CFM to a cash programme.</td>
</tr>
<tr>
<td>When?</td>
<td>At the project planning and design stage.</td>
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**What’s a PIA?**

- A Privacy Impact Assessment (PIA) identifies data protection risks and mitigations measures, and, for WFP country offices, forms the basis for legal agreements such as data sharing agreements.

**Who should carry out a PIA?**

- Ideally, a PIA should be carried out by the data protection focal point.
- In the absence of a data protection focal point, it should be conducted by someone who is familiar with the CFM and its data flows.
- They should be able to identify data risks, mitigation measures, roles and responsibilities for every stage of the data flow process.

**The CFM PIA will focus on the following:**

- CFM Communication Channels
- CFM Structure
- Data and information management flows
- Roles and Responsibilities of the three core stakeholders: WFP, partner agency, and CFM user
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GUIDANCE: ALNAP & CDA: Closing the Loop – Effective Feedback in Humanitarian Contexts

What is in this tool? This guidance document explains how to design and implement an effective complaints and feedback mechanism.

How? Your organisation can follow the proposed steps to determine the best communication approach with crisis-affected communities and set up a robust complaints and response mechanism.

When? Set the complaints and feedback mechanism up as early as possible in your response and review its effectiveness throughout the programme lifecycle.

- The document presents 15 guidance points to ensure an effective mechanism.
- The process of setting up a mechanism begins with identifying which communication tools and channels are most appropriate for the complaints and feedback mechanism (p. 14-17).
- Guidance on sorting, analysing, verifying and sharing feedback (p. 18-22), responding to and using feedback (p. 23-24) and perceptions and expectations (p. 25) will also be highly valuable in the context of mitigating risks of abuse of power in cash assistance.

TOOL: IFRC/ICRC Feedback and complaint form template

What is in this tool? This template is a log sheet for complaints with built-in basic analytics. Using a feedback/complaint form will ensure that all feedback and complaints are tracked and that adequate follow-up actions are taken.

How? You can use this simple template to log feedback received face to face or through any other communication channel.

When? Throughout implementation.

The Excel sheet comprises four tabs:
1. **Instructions**: This first tab explains what the tool and the different tabs are about.
2. **Print**: This is a template that can be printed before a distribution.
3. **Data**: The data tab allows you to record and code the received feedback and complaints.
4. **Report**: In this tab the built-in analytics will provide you with statistics on recurring issues. It is recommended to regularly analyse the received feedback and complaints to make sure you stay on top of any evolving trends.

Further reading:

GUIDANCE: IASC Best Practice Guide – Inter-agency Community-Based Complaint Mechanisms

This very comprehensive document provides guidance on how to set up and run an inter-agency community-based complaint mechanism to handle reports of sexual exploitation and abuse by humanitarian workers. A Community-Based Complaint Mechanism (CBCM) is a system rooted in community input so that the structure is both culturally and gender-sensitive, maximising its safety and effectiveness. The primary concern of such a mechanism is to help known and potential SEA survivors, facilitate SEA reporting and allegation referrals, and to fulfil a prevention function through training and awareness-raising.
GUIDANCE: IASC Collective Accountability to Affected People (AAP)

Collective AAP approaches have a broad focus on the views, feedback and complaints of crisis-affected people across the entire response, including those who may not be receiving assistance or protection. This note sets out some practical steps that humanitarian coordinators and country teams can take to ensure that collective AAP guides the humanitarian response.

CASE STUDY: Collective Accountability to Affected People (AAP): The Iraq Information Call Centre (P2P Support learning mission)

This case study reviews the practical steps senior humanitarian leaders took to put collective AAP in practice in Iraq in 2015 when they established an Information Call Centre to improve two-way communication between displaced people and aid agencies. An interagency approach was deemed vital to improve the response and ensure that limited resources were used in the most efficient way.

INTER-AGENCY HOTLINE: Awaaz Afghanistan

Awaaz Afghanistan is a humanitarian helpline connecting Afghans (IDPs and returnees) and refugees affected by conflict and natural disaster with information on assistance. It’s a toll-free, confidential hotline that anyone with access to a mobile phone can call for free to access information and share feedback and complaints about the humanitarian response.