

Feedback and Complaints Policy (Program Partners and People we work with and for)			
Type	Program Policy	Effective	November 2018
Author	Analysis, Accountability and Business Development (AABD) Team	Supersedes	NEW
Scope	OAU funded Programs	Review	November 2021
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## Purpose

This policy aims to ensure that Oxfam Australia (OAU) recognises the value of listening to and responding to feedback and complaints, as a key component of ensuring that our programs accomplish minimum quality standards and accountability to partners and people we work with and for. This policy defines the key principles, minimum requirements, responsibilities and approach of OAU to fulfil our mandatory and ethical commitments to accountability, and managing feedback and complaints relating to our program work from program partners and people we work with and for to a high standard.

## Scope

This policy applies to the handling of feedback and complaints from program partners and people we work with and for (to deliver OAU's programs) including staff, partners, volunteers, people we work with and for or anybody directly involved in the delivery of our programs. This policy applies to all program activities, including long term development programs, humanitarian responses, advocacy and campaign activities, whether implemented in Australia or internationally. The policy applies equally to programs directly implemented by OAU or those implemented through partners or other Oxfam country teams and affiliates.

## Related Documents

- *Oxfam International Partnership Principles*
- *OAU's Board Policy BRD005: Complaints and Whistleblowing* outlines OAU's approach to handling complaints and whistleblowing, including through maintaining processes to respond to complaints, and protecting those who report wrongdoing.
- The reporting and management of compliments and complaints from OAU supporters is covered under Oxfam's "*Supporter Compliments and Complaints Handling Procedure*".
- Complaints handling in relation to safeguarding, including child safeguarding is covered by *OAU Child safeguarding Policy* and *Oxfam International Reporting Misconduct Standard Operating Procedures (SOP)*

## Rationale

OAU aspires to make a sustained and significant positive impact on poverty and injustice, and believes it is only through collaboration and the collective effort of many actors that this goal can be achieved. As such, partnership is a critical foundation of our work articulated through the "*Oxfam Partnership Principles*". Accountability to partners and people we work with is part of that commitment and Oxfam has a long history of seeking input and feedback from partners and people we work with and for on our performance through a range of formal and informal mechanisms.

An important aspect of accountability is the ability for stakeholders to report or lodge a complaint about conduct that breaches OAU's commitments and guiding principles. Oxfam recognises the importance and value of listening and responding to complaints. This enables program partners and people we work with and for to hold OAU to account for our actions and decisions by providing a process where these can be queried and a response obtained. This policy ensures that partners and people we work with and for who identify or suspect the existence of inappropriate behaviour or incorrect practices on the part of OAU are able to communicate these concerns without this having any negative consequences.

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## Approach

This policy aligns OAU's approach with the *Oxfam International Partnership Principles*, Oxfam International (OI) *Guide to Policy on Whistleblower and Complaints* and the OI *Common Approach to MEL and Social Accountability*.

Within the framework of this policy, it is acknowledged that Oxfam has diverse (formal and informal) approaches to seeking feedback, complaints handling and accountability at the level of partners and people we work with and for. These different mechanisms exist and are managed where programs are implemented, both in Australia and overseas through Oxfam Country Offices. Oxfam ensures that different and flexible approaches for feedback and complaints handling are used based on specific cultural and country contexts.

## Relevant Standards, Codes and Obligations

<p><b>Australian Council for International Development (ACFID)</b> <b>Code of Conduct - effective June 2017</b></p>	<p>The Code is underpinned by a set of values which inform the behaviours of all Members all the time. The values are translated into high-level Quality Principles that are then translated into specific Commitments and associated Compliance Indicators.</p> <p>Quality Principle 2 – Participation, Empowerment &amp; Local Ownership 2.2 We promote the empowerment of primary stakeholders.</p> <p>Quality Assurance Framework – Compliance Indicators 2.2.1 Members have formal mechanisms for primary stakeholders to contribute their ideas, feedback and complaints so that they have a voice in and ownership of their own development and humanitarian initiatives.</p> <p>Good Practice Indicators (Members to demonstrate progressive compliance)</p> <ul style="list-style-type: none"> <li>• Members periodically evaluate and reflect on their approaches and mechanisms designed to empower primary stakeholders e.g. in design appraisal tools or in terms of reference in evaluations.</li> </ul> <p>Quality Principle 4 – Quality and Effectiveness 4.4. We reflect on, share and apply results and lessons with stakeholders.</p> <ul style="list-style-type: none"> <li>• Members have mechanisms to ensure results, lessons and findings of work are shared with and feedback is sought from primary stakeholders in accessible and appropriate ways.</li> </ul> <p>Quality Principle 5 – Collaboration 5.1 We respect and understand those with whom we collaborate.</p> <ul style="list-style-type: none"> <li>• Members have regular meetings with partners and/or collaborators where open feedback and dialogue is facilitated.</li> </ul> <p>5.2 We have a shared understanding of respective contributions, expectations, responsibilities and accountabilities of all parties.</p> <p>Members periodically review formal agreements with partners through a process which encourages mutual discussion and feedback.</p> <p>Quality Principle 7 – Governance</p>
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	<p>7.3 We are accountable to our stakeholders.</p> <p>7.3.3 Members enable stakeholders to make complaints to the organisation in a safe and confidential manner.</p> <p>7.3.5 Members seek input and feedback from all stakeholders.</p> <ul style="list-style-type: none"> <li>Complaints mechanisms are adapted to local contexts and provided in accessible formats and languages.</li> </ul>
<b>Oxfam International Program Standards</b>	<p><i>These minimum standards apply to all Oxfam programs around the globe.</i></p> <p>Program Standard 11: Programs are accountable to stakeholders</p>
<b>Other Oxfam International requirements</b>	<p>This policy aligns OAU's approach with the Oxfam International (OI) <i>Complaints Policy</i> (in draft), <i>OI Accountability Framework</i> (in draft), and the <i>OI Common Approach to MEL and Social Accountability</i>.</p>
<b>INGO Accountability Charter (2006)</b>	<p>This charter sets out core values and operating principles for international agencies, against which Oxfam gauges and reports publicly on our economic, environmental and social performance.</p>
<b>The Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief (1994)</b>	<p>The Red Cross Code of Conduct is a voluntary code outlining key standards for international development and humanitarian programming. Oxfam is a signatory to the code.</p> <p><u>Principle 9</u>: We hold ourselves accountable to both those we seek to assist and those from whom we accept resources.</p>
<b>The Sphere Handbook – Humanitarian Charter and Minimum Standards for Disaster Response (2011)</b>	<p>Sphere standards apply to humanitarian responses, providing minimum standards of performance and operation.</p> <p><u>Core Standard 1</u>: People-centred humanitarian response: <i>People's capacity and strategies to survive with dignity are integral to the design and approach of humanitarian response</i>. Key action: Enable people to lodge complaints about the programme easily and safely and establish transparent, timely procedures for response and remedial actions.</p>
<b>Core Humanitarian Standard on Quality and Accountability (CHS) (2014)</b>	<p>As a core standard, the CHS describes the essential elements of principled, accountable and high-quality humanitarian action.</p> <p><u>Standard 5</u>: Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.</p>

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## Definitions

For the purposes of this policy and OAU's approach to feedback and complaints handling for programs, the following definitions apply:

*Accountability:* Processes through which an organisation makes a commitment to respond to and balance the needs of stakeholders in its decision making processes and activities, and delivers against this commitment.

*People we work with and for<sup>1</sup> :* People who are either directly or indirectly engaged in an Oxfam program and who benefit from the activities of the program. For example, they may receive or benefit from a product or service.

*Complainant:* Person or organisation making the complaint.

*Partners:* Individuals, groups of people or organisations that collaborate with Oxfam to achieve mutually agreed objectives in aid and development activities. This may include affiliates.

*Feedback:* The systems, processes, attitudes and behaviours by which an organisation can really listen to their stakeholders, to find out if it is meeting their needs, desires, and agreed requirements or standards, which includes:

- Opinions and suggestions
- Complaints

*Complaint:* An expression of dissatisfaction made by an individual or organization external to Oxfam about the standards of service, actions or lack of action by Oxfam or its staff, volunteers or anybody directly involved in the delivery of our work. It is a criticism that expects a reply and would like things to be changed. A complaint has to be about an action for which Oxfam is responsible for or is within our sphere of influence. Complaints could include:

- Concern from someone we work with about the quality of program delivery.
- Concern from someone we have criticised in a policy paper because he/she feels it is unfair
- Concern about the behavior of staff, volunteers or contractors including abuse of power and exploitation, felonies such as theft or fraud, endangering the environment, etc.

A complaint does NOT include where partners or people we work with and for disagree with our policy/ approach. Moreover, a complaint is not:

- A general query about Oxfam's work
- A request for information
- A contractual dispute

<sup>1</sup> For the purpose of this Policy, the definition has to this term combine the standard OI definitions for 'people we work with' -previously called (Direct Beneficiaries) - and indirect reach –previously called 'indirect beneficiaries'.

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## Key Principles

This Policy is guided by the following principles:

1. OAU is committed to upholding the highest possible standards of behaviour and minimum quality standards across all programs, and therefore recognises the importance and value of listening to feedback and complaints.
2. OAU will ensure that partners and people we work with and for have accessible, safe and discreet points of contact through which to raise concerns or complaints.
3. OAU is committed to ensuring that feedback and complaints handling processes are effective, safe, confidential and accessible to all, irrespective of age, gender identity, status, disability, or background and without prejudice to future participation.
4. OAU will proactively provide clear, easily understandable information to partners and people we work with and for about our complaints handling procedures.
5. OAU recognises the importance of equipping staff, volunteers and consultants with an understanding of OAU's commitment to accountability and approach to feedback and complaints and will support them to effectively implement the relevant policies.
6. OAU will ensure that all complaints handling processes and decisions are responsive, fair and reflect OAU's principles and guiding values.

## Minimum Requirements for Implementation in all Oxfam Australia Programs

In addition to upholding the above-mentioned principles, all OAU funded programs/projects will ensure:

- a) Right to provide feedback and make a complaint (including a complaint to ACFID): Proactively inform stakeholders of this right in an appropriate manner. Where relevant, Oxfam will also advise complainants of their ability to make a complaint regarding an alleged breach of the ACFID Code of Conduct to the ACFID Code of Conduct Committee.

In the case that Oxfam is working through partners, all Partner Working Agreements or equivalent must include clauses which outline:

- safe, accessible and discreet mechanisms for partners and people we work with and for to submit feedback and complaints to Oxfam, and Oxfam's process for handling feedback and resolution of complaints. This clause will be adapted by each country office and programming unit to list the specific feedback and complaints mechanisms appropriate to that context (for example - a local phone number, email address, individual point of contact and mailing address).
- the partner's responsibility for communicating these Oxfam feedback and complaints mechanisms to program/project participants and ensuring that they are aware of how their feedback and complaints will be received, handled and resolved by Oxfam (in line with this policy).
- the partner's responsibility for establishing and communicating safe, accessible and discreet feedback and complaints mechanisms for program/project participants (for the receipt and response to direct feedback and complaints from program/project participants).

Where Oxfam is directly implementing programs/projects, safe, accessible and discreet feedback and complaints mechanisms must be established and communicated by Oxfam staff directly to people we work with and for (as above, in relation to the setup, handling and resolution of feedback and complaints).

- b) Participation in how complaints are managed: Give complainants the opportunity to be consulted in the handling of their complaint.

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- c) Accessibility: Partners and people we work with and for should be able to provide feedback and make a complaint as easily as possible.
- Complaints can be received through written correspondence, e-mail, telephone, verbally or through other communication mechanisms depending on the context (as outlined in *OAU Disability Inclusion Policy*).
  - Special attention must be paid to ensure the most vulnerable and disadvantaged stakeholders are able to make a complaint.
  - Where formal complaints are received through non-written forms, Oxfam teams should take the responsibility to document this appropriately.
  - Where relevant, all feedback and complaints mechanisms should be child friendly and cater to the needs of people with all abilities.
- d) Professionally handled: Appropriate investigation, timely, written response and confidential handling:
- In case of a complaint, an initial acknowledgement and response must be provided to the complainant within 48 hours of receiving the complaint. This initial response will acknowledge the receipt of the complaint and briefly outline how Oxfam will handle and resolve the complaint.
  - The relevant Oxfam delegate or Manager will determine if and how to investigate the complaint.
  - Formal response must be given (and explained/communicated as necessary) within 15 working days of receiving complaint.
  - Where a complaint resolution takes longer than 15 days, the complainant must be provided periodic updates on the progress made.
  - Oxfam definition of confidential is 'need to know' - this will be explained to complainant at time of making complaint.
- e) Learning and accountability: All complaints must be documented, monitored and reported to in line with Oxfam and contractual requirements.
- At a minimum, complaints need to be reported quarterly to Oxfam International and Oxfam Australia through Country Quarterly Monitoring Reports (CQMRs).
  - At the project level, all complaints received should be reported through 6 monthly progress reports.
  - Undertake more frequent monitoring and reporting on serious complaints from, or disputes with, partners and people we work with and for which indicate non-compliance with this policy, are a risk to Oxfam, or otherwise require a significant response.
  - Undertake a trends analysis and a learning activity across all received complaints at least once a year.
- f) Non-discrimination: Nobody making a complaint against OAU will be discriminated against in any way.

## Supporting Documents for Implementation

The following guidance documents provide practical guidance on setting up feedback and complaints mechanisms.

- [Guidance for Setting Up Feedback Systems for Oxfam and Partners](#)
- [Oxfam TEN TOP TIPS for Humanitarian Accountability](#)
- [OAU Child Safeguarding Toolkit](#) (See section 12) for guidance on setting up child friendly feedback and complaints mechanisms

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## Responsibility and Authority

<b>Accountable</b>	<b>Activity</b>
<b>Program Manager/ Coordinator</b>	<p>Responsible for ensuring that these policy guidelines and minimum requirements for implementation are adhered to through OAU funded programs, and that the required capacity to implement is built into the program.</p> <p>Responsible for sharing this Policy and minimum requirements for implementation with relevant implementing partners</p>
<b>Line Manager</b>	Responsible for ensuring all program staff read this policy and understand how it relates to their areas of work.
<b>Country Director</b>	<p>Responsible for ensuring relevant program staff have adequate awareness, capacity, and support to effectively implement this policy.</p> <p>Responsible for incorporating consideration of this policy in country level planning, budgeting and resource allocation.</p> <p>Responsible for ensuring all feedback and complaints received relating to the country program/partners are resolved appropriately</p> <p>Escalating complaints to Oxfam Australia as required, and reporting on all serious complaints</p>
<b>Portfolio Managers</b>	<p>Ensure that all program designs adhere to this policy and that implementing program staff are aware of the policy implications and incorporate this into their work.</p> <p>Ensure all program/project appraisals and risk assessments adequately consider the minimum requirements for implementation outlined in this Policy.</p> <p>Ensure that any recommendations that are made in the context of this Policy during a program/project appraisal and monitoring are followed up and addressed by the relevant teams during implementation.</p>
<b>Contract Management Coordinators</b>	<p>Ensure that contracts entered into with Oxfam affiliates and other partners ensure compliance with this policy, including reporting on identified risks, issues and processes.</p> <p>Appropriately communicate this policy and minimum requirements to Oxfam country teams.</p>
<b>ATSIPP Manager</b>	<p>Ensuring relevant program staff have adequate awareness, capacity, and support to effectively implement this policy (including trend analysis of all complaints and related reporting to OI and/or OAU)</p> <p>Ensuring all complaints received relating to the ATSIP program/partners are resolved appropriately</p>

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	Incorporating consideration of this policy into planning, budgeting and resource allocation
<b>Public Policy and Advocacy (PPA) Managers/ Campaigns Managers</b>	<p>Ensuring relevant staff have adequate awareness and capacity, and support to effectively implement this policy</p> <p>Ensuring that public policies and statements, where relevant, reflect the commitment to accountability and handling complaints to a high standard</p> <p>Ensuring all complaints received relating to PPA/campaigns work/partners are resolved appropriately</p> <p>Incorporating consideration of this policy into planning, budgeting and resource allocation</p>
<b>Program Director and Public Engagement Director</b>	Responsible for ensuring that all programs, and public policies and statements meet the principles and expectations outlined in this policy.
<b>Chief Executive</b>	Responsible for holding Section Directors accountable to implement this policy and promoting policy principles, as appropriate, in the Oxfam International Confederation.



# Annex: Feedback and Complaints Procedure Flowchart

