Protection from Sexual Exploitation and Abuse

Compendium of Practices on Community-Based Complaints Mechanisms

Interagency Standing Committee (IASC) Task Force on Protection from Sexual Exploitation and Abuse by our own staff

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Acronyms

ADRA	Adventist Development and Relief Agency
ARC	American Refugee Committee
BPRM	Bureau of Population, Refugees and Migration
BSO	Building Safe Organizations
CBCM	Community Based Complaint Mechanism
CBO	Community Based Organization
CCSDPT	Committee for the Coordination of Services to Displaced Persons in Thailand
CoC	Codes of Conduct
COERR	Catholic Office for Emergency Relief and Refugees
FGD	Focus group discussions
FP	Focal Points
GARR	Groupe d'Appui aux Repatriés et Réfugiés
GBV	Gender-based violence
HAP	Humanitarian Accountability Partnership
IASC	Inter-Agency Standing Committee
INGO	International non-governmental organization
IOM	International Organization for Migration
IRC	International Rescue Committee
JCRM	Joint Complaint and Response Mechanism
JRS	Jesuit Refugee Service
KAP&B	Knowledge, Attitude, Practice and Behavior
LWF	Lutheran World Federation
LWF/DWS	Lutheran World Federation/Department for World Service
LNGOs	Local Non-governmental Organizations
MINUSTAH	United Nations Stabilization Mission in Haiti
NGO	Non-governmental organization
OCHA	Office for the Coordination of Humanitarian Affairs
PSEA	Protection from sexual exploitation and abuse
PU-AMI	Première Urgence - Aide Médicale Internationale
SEA	Sexual Exploitation and Abuse
TBBC	Thailand Burma Border Consortium
ToT	Training of Trainers
UN	United Nations
UNHCR	United Nations High Commissioner for Refugees
WASH	Water, Sanitation, and Hygiene.
WEAVE	Women's Education for Advancement and Empowerment

I.   Introduction

Background

In 2010, the Inter-Agency Standing Committee (IASC) conducted a Global Review on the state of Protection from Sexual Exploitation and Abuse (PSEA) by the UN, NGO, IOM, and IFRC personnel,[1] which concluded that with the exception of 3 out of 14 agencies, agency Headquarters were not giving clear directives on the prevention of Sexual Exploitation and Abuse (PSEA) to the field. The Review also concluded that awareness raising and complaint mechanisms are not in place as well as monitoring of activity or sharing of good practices among agencies. Without the implementation of these mechanisms, vulnerable population will not know how to file complaints or report them in the first place.

As a result of the Review, the IASC Task Force on Protection from Sexual Exploitation and Abuse by our own staff was established with one of its objectives being to support field offices in implementing inter-agency joint community based complaints mechanisms (CBCMs). Furthermore, at the most senior level of humanitarian organizations, the IASC Principals has taken a pro-active approach requesting that PSEA and accountability to affected populations be a priority of assistance delivery systems.

Purpose

The purpose of the present compendium is to *reference practices which have been applied during the implementation of community-based complaints mechanisms, particularly those established with the explicit objective of addressing sexual exploitation and abuse of beneficiaries by humanitarian or development personnel.* The purpose is also to highlight practices used when operating CBCMs in a broader range of issues. These include protection issues (including physical violence, discrimination, threats, not necessarily by agency personnel) and general feedback on assistance programming, which may offer learning for operating CBCMs designed specifically to address sexual exploitation and abuse of beneficiaries or other forms of staff misconduct. The purpose is *not* to offer a definitive evaluation of practices employed by agencies - clearly, some practices work better in some contexts than others, the use of complaints boxes is a good example. Nor is the purpose of the compendium to describe investigative procedures, disciplinary processes against subjects of complaints, or even overall numbers relating to the incidence of sexual exploitation and abuse across humanitarian or development settings, as important as these things may be. The purpose is to describe procedures/methods which seem to be meeting with success, those which aren't or need to be adjusted, and practices which may have value for CBCMs but have not been employed as such or infrequently so.

Methodology

A call was issued to persons, agencies, membership organizations, and platforms known to or likely to have been involved in operating CBCMs in the past. We asked them to submit practices deemed good, worthwhile, or simply informative in terms of addressing the issue of sexual exploitation and abuse by

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[1] Global Review of Protection from Sexual Exploitation and Abuse by UN, NGO, IOM and IFRC Personnel. http://www.humanitarianinfo.org/iasc/pageloader.aspx?page=content-products-products&sel=14.

agency staff.[2] This included the members of the IASC Task Force on Protection from Sexual Exploitation and Abuse, Interaction, other IASC subsidiary bodies, Humanitarian Accountability Partnership (HAP), and persons known to have conducted evaluations of CBCMs in the past. Based on information received as well as on general knowledge of CBCM implementation, the compilers contacted persons and organizations for sharing of specific practices, verification of information already received, opinions on what has worked and what hasn't, and what recommendations would be made for improvement if any. For agencies or persons known to have been involved in a PSEA CBCM or clearly relevant CBCM, the compilers requested information using the format provided in Annex A. Emphasis, however, was more on simply sharing the practice so that it could be included in the compendium and shared with the wider agency community. Existing repositories, namely the PSEA Task Force website, were also consulted for practices relating to CBCMs and included here. After calls for information on practices, it was rapidly evident that the number of specifically PSEA-focused CBCMs that have been implemented is fairly small and that full evaluations of these (and other CBCMs) is even smaller. Thus, it is important to note that the compendium - and any analyses of the practices –is not based on comprehensive data and therefore may not present a full picture of all the practices out there nor what the experience has been in implementing them.

> **IMPORTANT!** This compendium is organized into two distinct parts. The first references practices collected into three categories, *Practices to Keep, Practices to Change,* and *Practices to Consider*. For each practice described in these sections, specific examples representing a success or the possibility of improvement are listed. For the purposes of keeping this compendium readable and succinct, these examples are hyperlinked to the full description, document, or sample as submitted by organizations or identified in the course of researching practices.
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> In the second section, CBCMs focusing on PSEA as well as other CBCMs are described according to information submitted and collected. We have organized this information into specific categories: project design; interagency complaint referrals; beneficiary awareness of complaint mechanism; beneficiary satisfaction levels; incident reporting type, channels, and levels; training of participating agency staff; notable project outcomes; sustainability factors; transferable project outputs; and project gaps. Here again, where possible, practices have been hyperlinked. In many cases, we have listed these as well in the *Practices to Keep, Practices to Change,* and *Practices to Consider* sections. As a result, some practices are listed twice.

Additional Notes

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[2] The terms staff and personnel are used interchangeably in this compendium and refer to persons who have a contractual employment, even if it is not remunerated (volunteer or intern for example) with agency, whether it is a UN agency, a Community-based organization, an NGO or an International NGO.

In compiling the practices, the compendium takes careful account of the *Guidelines on Setting up a Community Based Complaints Mechanism Regarding Sexual Exploitation and Abuse by UN and non-UN Personnel* developed by UNHCR and the IASC Task force on PSEA. These guidelines offer a clear description of the main components of a PSEA-focused CBCM, allowing for differences or adjustments according to context. Consequently, we have organized many of the practices in accordance with guidance offered in these guidelines.

Finally, kindly note the present compendium does not constitute a finished product by any means. It is anticipated that practices will be added to the ones described here as they are discovered, submitted, or even created and implemented.

II.   Executive Summary

The exercise of compiling practices related to the community-based complaints mechanisms (CBCM) focused on sexual exploitation and abuse (SEA) by humanitarian or development workers confirms what many agencies have already observed as a weakness: CBCM, particularly those of an interagency nature, are rare. Indeed, despite the momentum created by the issuance of the UN Secretary General's Special Bulletin on Sexual Exploitation and Abuse in the wake of the West Africa scandals, relatively few collective endeavors to create safe and accessible interagency avenues for beneficiaries to raise a concern or lodge a complaint regarding staff involvement in abuse of beneficiaries have been established. This is in part due to the fact that the humanitarian and development sectors recognized quickly that establishing CBCMs focused exclusively on preventing sexual exploitation or abuse, and advertizing them as such, seems to dissuade rather than encourage reporting by beneficiaries. Nevertheless, despite a sector-wide focus on the issue, increased donor scrutiny, incidents dissected in the media, and repeated calls for improvements, interagency CBCMs remain few. As a consequence, there is little experience and data to draw upon in the analysis of what does and doesn't work in terms of CBCMs, which seek to root out the problem of sexual exploitation or abuse by staff members.

Inter-Agency and Internal Complaints' Procedures

Fortunately, individual agencies have sought to implement complaint mechanisms as part of their programming. Coupled with growing knowledge and interest in the field of accountability to affected populations, the small number of PSEA-focused CBCM initiatives has generated at least some instruction on how complaint mechanisms can be effective and sustainable. For instance, opting for interagency complaints mechanisms rather than relying on individual agencies to operate their own, is a tremendously important lesson learnt. The experience of certain CBCMS suggests that their interagency aspect is precisely what facilitates and encourages reporting by beneficiaries, or even whistle blowing by agency personnel. This in no way dilutes another extremely important lesson, namely that clear internal complaints procedures are just as important as having interagency systems for receiving such complaints. Indeed, the lack of an understood or functional internal system for managing complaints in just one agency can jeopardize the credibility for multiple agencies, all the more so if that agency is participating in an interagency community-based complaints mechanism. Thus, and somewhat ironically, individual agency complaints management systems are just as important as interagency CBCMs; the former being fundamental to the success of the latter.

Practices to Keep

Positive practices include the adoption of common codes of conduct by participating agencies in a specific operational setting. This has helped hold a wider number of staff accountable in a specific location while projecting a common set of standards to the beneficiaries being served. Having such common codes or standards in place renders training of staff from multiple agencies that much easier and consistent, reinforcing understanding as well as a sense of ownership. Another good practice is the use of knowledge attitude and practice (KAP) surveys before, during, and after an initiative to address

SEA. While such surveying permeates the humanitarian sector, notably in health and WASH sectors, it has been rarely used for examining the reporting (or non-reporting) of staff misconduct. This is unfortunate given how informative this is in understanding local handling or processing of sensitive information. Similarly, surveying of beneficiary satisfaction before or after a CBCM project has rarely been carried out but can yield precious information for refining, improving or sustaining a complaints mechanism. Both KAP and beneficiary satisfaction surveying also have the added benefit of allowing beneficiaries additional opportunities for disclosing situations or incidents.

Another strong practice, which must be considered for any future CBCM project, is the practice whereby independent complaint handling committees or clearinghouses form an integral part of the complaints mechanism itself. An independent clearinghouse entity, not affiliated with a single agency, tasked with the responsibility of receiving and referring reports to the appropriate agencies helps reduce the time and even subjectivity with which agencies may process incoming reports. It can reinforce the neutrality and the all-important perception of independence or objectivity of the complaints mechanism.

Practices to Change

The practices that have not been successful in the implementation of PSEA-focused CBCMs do not come as a surprise. The first lesson is that there is still insufficient consultation with the beneficiary community in the establishment of CBCMs, especially in the early stages of such an initiative. While there has been some consultation in certain projects, it seems insufficient in terms of designing the CBCM to the needs to the community using it and to the trust necessary for operating it. This, however, seems to apply almost exclusively to interagency CBCMs and not to individually operated complaints mechanisms, which are more often based on a consultative processes with the community served. Closely related to this poor practice, is the absence of better or closer relations with community-based organizations (CBO) in the design on the CBCM as well as its operation. Though they vary in size, mandate and structure, CBOs often enjoy greater trust within communities and can provide the bridge that agencies, especially larger organizations, need to deliver aid or assistance. Neglecting to involve them in the design of a mechanism means losing opportunities to develop relevant complaints mechanism as well as evaluating them as they evolve. Crucially, CBOs may bolster the sustainability of a CBCM and should therefore be more intimately involved in the development and operation of CBCMs by NGOs, INGOs or UN agencies.

Another weakness in addressing SEA is the lack of a strategy for tackling rumors or hearsay within communities and the workplace. This lack of strategy stands in contrast to the clarity with which many agencies will approach official complaints or concerns. Though not a practice per se, this pattern of negligence towards rumors is unfortunate because SEA, like other types of staff misconduct, usually surfaces first as rumors before being reported by way of an official channel. Given the sensitive nature of SEA, it stands to reason that agencies and interagency CBCMs should adopt a more proactive approach to rumors, rather than wait for the rumors to reach them or be captured in an official incident report. There are, of course, challenges to such a proactive approach, namely that pursuing rumors may generate a false impression of guilt or have unintended consequences. Still, however, the current of practice of waiting until a rumor is brought to a complaint mechanism by an actual person hampers

successfully addressing SEA. There is a sector responsibility to more actively assess or tackle rumors as opposed to letting them fester and jeopardize the CBCM.

Certain practices may be fundamentally sound but require change or simply better implementation if CBCMs are to be used effectively for reporting SEA. The use of complaints boxes, in particular, illustrates this point. By general agreement, complaints boxes established for reporting SEA or other forms of misconduct, or even general protection issues, do not function well and increase protection risks instead of reducing them. Furthermore, feedback from some beneficiary populations is that complaints boxes constitute a "black hole" into which complaints or feedback disappears forever without getting proper attention. The improvements therefore are at the level of how the boxes are advertized and, perhaps more importantly, how they are managed. What clearly must be avoided is that boxes are used in isolation without any indication to the community of when they will be opened and the complaints processed. Without a clear management plan for the boxes, the complaints boxes may falsely raise hopes and jeopardize beneficiaries' willingness to report exploitation or abuse by a staff member. As such, complaints boxes are a practice that requires improvement.

Practices to Consider

Finally, the field of community-based complaints mechanisms remains a new one in which agencies and workers alike are still learning what works best and what lessons from other fields can be applied to CBCMs focusing on PSEA or staff misconduct. In this spirit, it is worth considering what practices should be used in the future. Here, we point to basic technological solutions already applied in protection programming such as texting reports of protection-related incidents or using web-based reporting channels. Obvious limitations in terms of accessibility to phones or the Internet exist but as this accessibility increases, the humanitarian sector would do well to consider their use closely, particularly on an issue which can require anonymity or heightened confidentiality.

III.   Practices to Keep

Clear internal complaints and management system

Before agencies seek to jointly establish community-based complaints mechanisms, it is fundamental that they have an internal complaints reporting and management system already in place. Internal channels for escalating a complaint or a concern must be established, accessible, consistent, and most importantly understood by all levels of staff. While many agencies may already have a code of conduct describing allowable and prohibited behavior, it remains unclear to many staff what the internal processes for lodging a complaint may be or what steps should be taken if information is received by an outside source (whether from the beneficiary community, partner organization, concerned individual or any other external entity) regarding staff misconduct. Such internal mechanisms may vary from agency to agency, depending on size, structure, mandate, and other organizational aspects, but generally must feature several core elements. First, multiple channels for signaling a complaint or concern must be in place – internal mechanisms must never offer only one avenue or channel to a staff member for reporting a concern. One of these channels should offer anonymity. Second, such internal mechanisms should always clearly identify the roles of the persons involved in the complaints management process. Again, these roles may vary enormously from organization to organization but must be made abundantly clear to those who are meant to assume them. Usually, this means guidance for supervisors receiving concerns or persons identified as focal points for receiving such concerns or complaints, responsibilities for managers when a complaint has been lodged, the duties of any person involved in an investigation of a complaint. Third, internal complaints management systems should have clear communication strategies for the management of complaints, i.e. what information will be shared with the complainant, witnesses, and subject of complaint. This also includes strategies for sharing information with other staff or personnel. Finally, whatever the internal mechanism may be, it is absolutely essential that it is understandable and accessible at the local or field levels.

Without a clearly defined and functional internal system for handling complaints internally, an agency may not be able to effectively

participate in a joint community-based mechanism with other agencies as it will be unable to process complaints received, whether they concern their own staff, that of others or beneficiaries. Furthermore, an agency lacking clearly defined internal mechanisms or steps may place in jeopardy the entire joint initiative as poorly or inconsistently handled complaints will harm the credibility of the joint complaints mechanism in the eyes of beneficiaries and other agencies.

Joint or Interagency Complaint Mechanisms

Generally speaking, any mechanism that seeks to be based at the community-level should involve the participation of all agencies present in that location, even if interaction between those agencies is rare. Agencies and previous CBCM experience indicate that the interagency nature of a complaint mechanism can offer advantages over individually operated ones. The first advantage is that a joint mechanism offers the beneficiary complainant (or even a complainant staff member) the option of complaining to an agency which does not itself employ the alleged perpetrator of the misconduct. In this way, a joint mechanism can reduce fear of reprisal and offer more comfortable options for a complaint to be made. Another advantage is that, as beneficiaries cannot or do not necessarily distinguish between humanitarian workers employing agencies and therefore may not distinguish which agency misconduct of a staff member should be reported, a joint mechanism allows reports made to any of the participating agencies to reach the appropriate agency. This is ensured usually through the adoption of interagency protocols which govern how these referrals should be made; the modalities of such a system may vary according to the number, type, and size of the agencies participating as well as the nature of the assistance being delivered/context in which the CBCM is operating. Some CBCMs have opted for a referral system **between** the agencies while others relied on a clearinghouse system and/or established complaints committees, which receive and refer reports **to** agencies. Related to this, interagency protocols also offer a practical accountability tool. Indeed, the referring agency and/or clearing house entity which has processed a report is in position to follow up on the complaint with the agency which employs the subject of complaint; encouraging or requiring action if none is being taken to stop the exploitation or the abuse which is occurring. This peer review element has been noted in at least one project but may not be applicable or achievable in all CBCMs. Yet another advantage offered by a joint CBCM is that it actively builds on the strengths and sector focus of the agencies participating. For instance, if a humanitarian context dictates that reporting instances of sexual exploitation and abuse is best done through existing gender-based violence reporting channels, then an interagency reporting mechanism can be designed to this effect; if, conversely, such reports are made more safely or effectively through a general protection concern reporting mechanism or even a quality of service feedback mechanism, then an interagency CBCM can build itself accordingly.

Overall it is a fundamental practice in relation to CBCMs is that they should be interagency in nature in order to facilitate reporting of allegations of sexual exploitation and abuse or other forms of staff

Examples of joint or interagency complaint mechanisms and protocols

- *Kenya - [Standard Operating Procedures for PSEA](#)*

- *Thailand - [CCSDPT Interagency PSEA Protocols](#)*

- *Haiti - [Description of a proposed joint mechanism in Haiti](#)*

- *Haiti - [Setting up a Joint Mechanism in Haiti](#)*

- *See Set Up a Complaints Mechanism in [ECB The Good Enough Guide](#)*

misconduct. An interagency mechanism combines the strengths of individual or internal agency complaint management systems and offers beneficiaries a more accessible and complete system for raising concerns.

Common agency code of conducts in specific settings

Almost all agencies delivering humanitarian assistance or working in development have codes of conduct to which personnel/staff must adhere to as part of their contractual obligations. Many of these are based directly on the UN Secretary General's Special Bulletin on Sexual Exploitation and Abuse. Despite the commonalities of agencies' codes of conduct, the discrepancies that persist between agencies in terms of their codes of conduct can hamper a collective effort to implement a CBCM. While it is unrealistic to expect large and small agencies to all have the same code of conduct, it is possible to develop a common code of conduct for agencies delivering assistance or operating in a specific location. Such a common code reinforces, rather than supplants, an agency's existing code of conduct.   A common code of conduct achieves multiple objectives related to CBCMs.

Sample Interagency Codes

- *Code of Conduct for Humanitarian Workers in the Kenya Refugee Program (2008)*

- *CCSDPT Interagency Code of Conduct (2007)*

- *Joint Operating Principles for Somalia (2008)*

- First, it offers a shared framework for the staff to operate in and a shared set of values that staff can identify with.
- Secondly, it is an effective response to the dynamic whereby beneficiaries do not distinguish between the agencies that humanitarian or development personnel work for.
- Thirdly, a common code of conduct means that any awareness-raising activities both amongst staff and beneficiaries on what standards agency personnel must abide can be done in a more time and cost-effective manner.

For example, a community meeting convened to inform beneficiaries on what types of behavior are explicitly prohibited by workers of 12 different agencies present in that community can eliminate the need for individual agencies to carry out the same discussion with the same group of people in the future. Finally, common codes of conduct help establish the behaviors which will or will not be investigated by agencies. While disciplinary measures may vary from one organization to the next, having such agreed standards increases the consistency with which agencies address this issue and therefore the perception amongst staff members and beneficiaries of agencies' objectivity or independence in their service delivery.

Beneficiary Satisfaction Surveys

As a key component of accountability in the humanitarian and development sectors, the measurement of beneficiary satisfaction surveys significantly help organizations adjust and perfect their programming. CBCMs, especially ones that are focused on PSEA, are no exception to this. Beneficiary satisfaction surveys have been conducted in very few CBCM projects but are useful exercises in observing how accessible and responsive a CBCM may be. Satisfaction surveys can also be used to measure the knowledge or awareness of a CBCM and by such also offer the implementing agencies an opportunity to refine or tweak the CBCM itself. They also enable agencies to better demonstrate their commitment to genuinely accountable programming in the eyes of donors, partners and the beneficiaries they serve.

Questions included in beneficiary satisfaction surveys range from how appropriate a person feels the complaint mechanism is to their own personal situation to whether they feel the implementing agencies provided sufficient feedback on complaints; to satisfaction with how cases of SEA were handled by the humanitarian sector. While such questions give rise to sensitive opinions, answers provided can be tremendously informative. When implementing or carrying out such surveying, agencies must offer the option of anonymous responses and explain carefully that honest opinions will be valued and will not result in the agency ceasing to obtain feedback on their services nor result in any aid being withheld. When surveying beneficiaries, agencies should also prepare for disclosures of staff misconduct and be ready to receive complaints.

Example of surveys of beneficiary satisfaction relating to CBCM or PSEA projects

- *See Survey on Satisfaction of CCSDPT Management of PSAE Services in CCSDPT Surveying of Beneficiaries*

Related:

- *Muslim Aid Bangladesh Community Meeting Report*

- *The Fritz Institute – The Immediate Response to the Java Tsunami: Perceptions of the Affected.*

> **INTERESTING**
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> Another form of assessing beneficiary satisfaction is through a system called Community Score Card (CSC). A Community Score Card is a participatory, community-based monitoring and evaluation tool that is used to inform community members about available services and their entitlements and invite them to give their opinion on the accessibility and quality of services such as a health centre, school, public transport, water and waste disposal system. By providing an opportunity for direct dialogue between service providers and the community, the CSC process empowers the public to voice their opinion and demand improved service delivery. The value of CSCs is that it promotes dialogue and consensus building and can strengthen citizen voice and community empowerment. Although not related to PSEA, an example of a Community Score Card in practice is CARE Malawi.

KAP surveying

Much like Beneficiary Satisfaction Surveys, Knowledge Attitude and Practice (KAP) Surveys help agencies design and/or adjust their assistance programming so as to be more effective. Again, the area of CBCMs is not an exception and KAP surveying is a practice which should be a feature as part of CBCM endeavors. KAP surveying allows agencies to better understand how a beneficiary population deals with sensitive issues, reveals which segments of the community may be at more risk than others, and enables agency personnel to better target specific persons in any awareness-raising activities. KAP surveying has been featured in several PSEA projects and numerous health and protection-focused programs, including KAP in relation to HIV/AIDS and other sexually transmitted infections. Questions can include understanding of the CBCM reporting channels, perceptions of the most likely perpetrators of SEA, and attitudes towards survivors of SEA. Responses to such questions are critical in designing a CBCM but also in refining and improving a CBCM over time. Thus, it is important to conduct KAP surveys at regular intervals when operating a CBCM.

Sample KAP Surveys and Methodologies

- *CCSDPT PSAE KAP Survey (2008-2009)*

- *CCSDPT PSAE KAP Survey Methodology (2008-2009)*

- *Final Evaluation of Prevention of Sexual Exploitation and Abuse Project in Kenya (2007)*

Complaints handling committees and/or clearing houses

Nearly all the PSEA CBCM projects have contained agreements relating to how agencies will report and refer incidents to each other as well as how to follow-up with support services. However, above and beyond the system for referring complaints to the appropriate agency when received by another there, several projects have operated using a central clearing house system or committee, which receives and redirects complaints to appropriate agencies as necessary. Using the clearing house system or enabling an independent committee to receive and refer complaints bolsters a community-based complaints mechanism in several ways.

- First, it can reinforce the perceived neutrality and independence of the complaints system in the eyes of both beneficiaries and staff, thereby encouraging further reporting.
- Secondly, such a clearing house can enable complaints to be evaluated by a single set of standards as opposed to agencies applying individual criteria to the receipt and analysis of a complaint.
- Thirdly, a clearing house, with well defined criteria and referral protocols in place, can reduce the time by an individual agency spends in analyzing a report or referring it to another as they might in a system where initial management response or management of a complaint is the responsibility of the receiving agency.
- Fourthly, record keeping or documentation of complaints can be more consistent if undertaken by a central entity on behalf of the others and is more likely to identify commonalities in exploitation and abuse across organizations/area of joint operations.

Though there is hard not evidence to support it, an interagency clearing-house system for managing complaints seems to be a more effective - and even preferred – method for complaints to be processed.

Using broadened complaints mechanisms

As suggested under the practices to change section, keeping complaints mechanism focused on a single specific issue, particularly one as sensitive and even dangerous as sexual exploitation and abuse, can be counter-productive. Beneficiaries are less inclined to make a complaint through such a reporting channel out of fear of social stigma, safety concerns, the general awkwardness of reporting about individual persons, and a host of other barriers. Thus, organizations and industry groups have been increasingly promoting the integration of PSEA complaints channels into broader complaints mechanism as this is more likely to result in actual complaints about PSEA. For the most part, agencies recognize that this is so and this is accepted as a good industry practice and no-longer frame a PSEA complaints mechanism in such narrow terms. Instead, a complaints mechanism seeking to protect beneficiaries from exploitation and abuse will be framed as one, which is part of a larger feedback mechanism on the overall humanitarian assistance (including distribution of aid) or one relating to protection in general but not SEA specifically. Though data on wanting to state firmly whether this is so, it seems that the limiting a complaints mechanism to employee or staff misconduct is also to be avoided and again that mechanism should be broader to maximize comfort or trust in accessing the mechanism.

Training of Stakeholders

It is important that all stakeholders know and understand the principles that underpin a complaints mechanism in addition to understanding how it works practically. It is not just agency staff and beneficiaries who should know how a CBCM works but agency partners, national authorities, and host populations. Particularly in an effort that is interagency, the training of partners and stakeholders on what the mechanism is, what types of behavior it seeks to isolate, and how is it is accessible, is critical. Training partners on what the mechanism is, what their role in it involves, and how to present the mechanism to the people (beneficiaries who are meant to access it) is therefore an important aspect of CBCMs and one which should be considered a best, or at least standard practice. Indeed, it is not only the beneficiaries who need to be made aware of the mechanism and how to access it but the staff of all partners involved. This enables beneficiaries or staff members who have specific questions about the mechanism to access a wider number of people for answers as well as present a more unified front to the issue. Training of partners also instills within a greater number of people the need for such a mechanism and ensures that the desire to have it in place does not rest on a single agency or set of persons. Diversifying the number and type of partners who understand and are able to promote the mechanism also contributes to the sustainability of the mechanism, especially when there is a tendency for staff to work for multiple agencies over time even in a single humanitarian or development setting.

Training and Information Tools

- *CCSDPT Staff Training Materials*

- *PSEA training manual for humanitarian workers*

- *The Kenya Refugee Program. PSEA police training module - trainer's guide*

- *PSEA Film facilitator's guide film facilitator's guide*

- *Oxfam Public Information Boards Notes*

- *Concern Pakistan Accountability Brochure*

- *The IRC Way Brochure*

- *WFP Training Module*

- *Prevention of SEA in Humanitarian Crises in Southern Africa*

- *Facilitators Notes DPI*

IV.   Practices to Change

Absence of meaningful and targeted consultation with beneficiaries

A recurrent theme in multiple CBCM projects, which focus on sexual exploitation and abuse, is the lack of meaningful or sufficient consultation with the beneficiary community at the start of the project. More specifically, consultation with the targeted beneficiary community does not occur with regard to how the community prefers to lodge complaints or even the need for such a project. Furthermore, while there has been some consultation for some projects, the consultation in question has not targeted segments of the community most relevant to the issue or who hold positions that are key to implementing an effective and sustainable CBCM. For instance, consultation with groups working with vulnerable women and girls can enable implementing agencies to devise or build-on appropriate channels for reporting but this has not happened sufficiently or systematically. In other cases, other groups, such as surrounding or hosting communities have not been involved in the design of the project, resulting in unanticipated resistance and tension towards the project or other obstacles jeopardizing the initiative entirely. There can also be targeted consultation, which hinders rather than helps an attempt at implementing complaints mechanisms, particularly ones focused on sensitive issues like sexual exploitation or abuse. Indeed, while consulting with the beneficiary leadership is critical to obtaining buy-in, it is in itself insufficient and may result in consultation with persons or groups themselves involved in exploitative practices. In this way, trust in any complaints mechanism is endangered from the start of the project. Recognizing that consultation with the appropriate segments of the beneficiary community can be constrained by project deadlines, time and can be difficult to do without upsetting community power dynamics, it is crucial that implementing agencies design a consultation schedule and tactics which will result in useful feedback and managed expectations.

It is also important to underline here that the process of consultation and the process of designing or establishing a CBCM may have unexpected consequences. The process of consultation with vulnerable groups, such as children, can always result in unwarranted attention, suspicions, even threats or worse from other segments of the community or agency personnel themselves. Agencies intending to implement a CBCM should take such risks into consideration and carefully enumerate the risks posed to different segments of the community before initiating the process.

Helpful Practices

- HAP/World Vision Complaints and Response Mechanism Questionnaire
- See Consultation Process in Worldwide West Darfur Programme, Sudan, Paper on Complaint and Response Mechanism Pilot, Mornei, West Darfur
- CWWD CRM Fact Sheet for explaining complaints mechanism to partners, staff, and community.
- See Focus Group Discussion Questionnaire on Concern CRM Evaluation Report
- See Part 3 in DCA Complaints Report 2011

Non-inclusion of community-based organizations in design of complaint mechanism

Community-based organizations, by virtue of having grown or emerged from beneficiary communities themselves, often enjoy more trust by the vulnerable members of those communities than do NGOs, INGOs, or UN agencies. This is particularly true of groups assisting vulnerable women and children who understand how, when, and where victims of abuse are likely to disclose the abuse. Unfortunately, however, multiple CBCM projects have not consulted such groups in the design of the complaints mechanism or verified the appropriateness of any mechanisms developed with such groups. This has been a lost opportunity as not only may proposed mechanisms be inappropriate to the needs of survivors, but a strong relationship between such CBOs and implementing agencies can help the speed with which complaints are received by NGOs or UN agencies. Furthermore, the non-inclusion or insufficient involvement of community-based organizations in the design of the mechanism itself reduces the sense of community ownership of such mechanisms and increases the perception that NGOs or UN agencies are afraid, unwilling or unable to receive complaints from the organized segments of the community, such as CBOs.

Finally, neglecting to include CBOs in the design of the CBCMs jeopardizes the sustainability of any CBCM because without the sense of community ownership by CBOs and the more vulnerable persons of the community, the CBCM is fundamentally dependent on the implementing agency's funding stream and/or desire to maintain a CBCM. Future efforts to implement CBCMs will need to involve close consultation with CBOs so as to build appropriate and relevant CBCMs as well as instigate trust between the entities which, after all, will be referring sensitive cases to each other.

- [CWWD CRM Fact Sheet for explaining complaints mechanism to partners, staff, and community.](#)
- Outcome of working with CBOs: [Karen Refugee Committee Code of Conduct](#)
- Outcome of working with CBOs: [Karenni Refugee Committee Code of Conduct](#)

No set standards or practice for following up on rumors or hearsay of abuse and exploitation

CBCMs are meant by definition to capture and document complaints or concerns and trigger a response process to address the concern. However, it has been unclear how CBCMs should capture rumors other than encouraging beneficiaries and agency personnel/staff to report rumors as well as firm complaints. Rumors are less likely to be reported precisely because they are rumors and individuals fear making serious allegations about another person or agency without concrete information. Moreover, rumors of sexual activity, particularly abusive or exploitative sexual contact, may circulate in a more hushed manner than other rumors or may be treated with a greater sense of "that's not my business" by beneficiaries and staff alike. At present, no PSEA-focused CBCM has adopted a pro-active approach towards rumors; this may be out of fear that investigating rumors will cast doubts over someone's reputation or place a beneficiary at risk. These are legitimate concerns. Nevertheless, ignoring rumors of staff misconduct or exploitation/abuse actively allows these practices to continue and mitigates trust that implementing agencies are trying to build in the system. Furthermore, closely documenting rumors

of staff misconduct can help detect larger patterns of abuse, especially if this is done in a central location or through a clearing-house system. Thus, it is important for future CBCM initiatives to define an exact strategy of if and how rumors will be captured, whether this will be done proactively and how and what measures can be taken to ensure that following up on a rumor does not place any stakeholder at risk.

Advertizing the CBCM as PSEA-specific

Experience from multiple organizations and interagency initiatives convincingly suggest that it is better not to advertize a complaint mechanism, especially one that is embedded in the community, as one which specifically addresses SEA complaints. There are multiple reasons for this. Firstly, anyone seen accessing the complaint mechanism, whether this is a focal point person, quiet location, or complaints box is associated with the issue and therefore at risk of reprisal from aid workers or the community itself, social stigma, or community disapproval. Visibly accessing such a mechanism in itself jeopardizes the much-needed confidentiality or discretion when disclosing such abuses. Furthermore, it can be unclear to beneficiaries how an agency or agencies will handle SEA complaints through a mechanism that is exclusive to that problem. PSEA-specific CBCMs may offer little complaint or feedback "management history" and therefore is that much more difficult to trust. Importantly, communities, staff, and other stakeholders can have difficulty understanding the purpose of a PSEA-specific, possibly viewing it as a channel for reporting socially controversial issues occurring in the community such as adultery or sexually inappropriate behavior instead of instances of misconduct by staff.

Complaint boxes

The effectiveness of complaint boxes as a tool for lodging and receiving complaints has been debated frequently. There are some obvious drawbacks to complaints boxes such as geographic accessibility or the need to be literate for lodging complaint letters. Many aid or humanitarian workers also correctly point out that complaint boxes, if poorly located, require beneficiaries to expose themselves publically when depositing a complaint and that this is itself can be a disincentive. Moreover, a complaints box system requires agency staff to regularly collect the contents of the box and if this is not done at frequent intervals a complaint may not be received by an agency in time to address a situation of abuse. Conversely, there are multiple advantages to the complaints box system. A complaints box meant to receive complaints of all types (related to food or non-food items for instance) can be a good cover for those who would need to lodge an SEA complaint and would not look out of place placing a complaint into a box. It can, if accessed discretely, help preserve anonymity and/or render beneficiaries more comfortable in lodging a complaint. PSEA-specific CBCMs report having mixed success using complaints boxes and this underscores that the utility of complaints boxes is tied directly to if and how the complaints are managed by the agency or agencies using them to receive complaints. What is clear is that while it is not likely that many or most SEA complaints will be lodged through a complaints box, it is

better to have a complaints box as part of a CBCM than not as this offers another option to the complaint-channel menu that beneficiaries can choose from.

Suggested Practices

- LWF Complaint Boxes in Nepal
- Complaint Box in Worldwide West Darfur Programme, Sudan, Paper on Complaint and Response Mechanism Pilot, Mornei, West Darfur
- Procedures for Dealing with Complaints and Suggestions Submitted by Palestine Refugees at RSSP's Areas Offices in the Gaza Strip
- Tearfund North Kenya Programme Suggestion boxes for community feedback

Insufficient Complaints Metrics

A recurrent obstacle in successfully addressing sexual exploitation and abuse by personnel or other instances of staff misconduct is that there is little understanding of the scope or extent of the problem. Individual agencies may have internal complaints mechanisms or may document beneficiary complaints against staff but rarely is such information shared or collated with the data of other agencies. It is difficult to know if the type of data that is collected is consistent across humanitarian or development agencies. This applies to data regarding beneficiary survivors or complainants, data pertaining to agency personnel/staff, and information regarding the location or modalities of the exploitation or the abuse. At present, the only report which attempts to capture the scope of the problem is the annual *Special Measures for the Protection of Sexual Exploitation and Sexual Abuse – Report of the Secretary General.* However, this report describes incidents and investigations relating to persons employed in the United Nations system and does not cover staff or personnel of humanitarian or development NGOs or those of other IGOs. Without more comprehensive data it is simply not possible to paint a full picture of the problem, nor establish a baseline from which to measure impact of different types of interventions to address the issue. As a result, agencies seeking to tackle the issue together in specific humanitarian settings must design reporting mechanisms, awareness-raising activities, and other aspects of their joint work, based on anecdotal evidence. A deliberate effort to create and include metrics relating to who engages in exploitation and abuse of beneficiaries and how (as well as the simple frequency of the issue) will enable agencies to better target awareness-raising activities amongst staff and beneficiaries and generally monitor the impact of their efforts to reduce the problem in a more effective manner., particularly if this is done as part of an interagency agreement covering multiple actors in a given humanitarian or development setting.

Suggested Practices

- Concern CCWWD Complaint Form

- Concern CRM Database Template Masisi DRC

- [IRC Allegation Report and Tracking Form](#)

- [Model Complaints Referral Form (Sexual Exploitation and Abuse)](#)

V.   Practices to Consider

Complaints Mechanisms and Technology

As connectivity and access to technology increases in the remote places of the world, it is important for agencies wishing to implement complaints mechanisms, including community-based or interagency mechanisms, to examine the opportunities afforded by new technologies to improve such mechanisms. An obvious example is mobile phone technology that has enabled some beneficiaries to access agency focal points without having to travel to an agency office, which has been at issue. In remote programming locations, this also has obvious benefits. With the number of beneficiaries who have access to mobile phones, this is something that merits being examined at the beginning of any CBCM project. Similarly, access to the Internet can bolster the options that beneficiaries have for lodging complaints, either by sending complaints to agencies directly through their websites or through email addresses that have been provided to them. Not long ago, this method would have been inconvenient or simply impossible; now, however, connectivity means that beneficiaries in some humanitarian settings can access complaints mechanisms to ensure a complaint reaches the highest levels of an organization. Some mobile technologies have been used already to track protection incidents. FrontlineSMS, a free downloadable software application that turns any laptop into a messaging centre by connecting it by cable to a mobile handset, has been used for wide-scale tracking of protection indents but also for responding to cases of violence affecting specific vulnerable populations, such as children. [3] Agencies working collectively to solicit reports of staff misconduct need to consider what technology beneficiary populations have access to (if any) and how this can be harnessed while applying the same principles (such as confidentiality, anonymity, or independence) of any "traditional" complaints mechanisms based on boxes, focal point persons, or walk-in centers.

Hotlines and Helplines

Hotlines are free phone numbers or e-mail addresses available every day and all day to allow the complainant to make direct contact with a trained personnel employed by an independent third party. Call takers create a record of all calls and report them promptly to a designated person within the agency for further review and handling as appropriate. In many cases the complaint can be made in a range of languages and can be made anonymously.

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[3] http://www.frontlinesms.com/2011/06/07/can-you-future-proof-an-ict4d-project-update-from-sms-reporting-system-in-benin/

Because hotlines are intended for anonymous callers, it is sometimes very difficult to verify the information received. The number of people who call is still very small as a percentage of the aid-recipient population. The line provides a direct line to a responsible agent, but may be at some cost to complainant if it is not a toll free number. [Oxfam Great Britain experience of using a hotline in Haiti](#) taught them that hotlines are not an appropriate means of detecting cases of exploitation and sexual abuse. It should be used in conjunction with other sources of information. Additionally, World Vision maintains an [Integrity and Protection Hotline](#) accessible 24 hours a day, confidential, and available in 180 languages and operated by a neutral third party.

Short Text Messaging (SMS)

Community members and beneficiaries are on the front line of aid and are the ones who have most at stake if programs fail to achieve their objectives. Being able to use a free SMS service provides a rapid and direct link between beneficiaries and agency staff or intermediaries and allows cases of abuse, corruption and malpractice to be reported.

VI. Joint Community-Based Complaints Mechanisms Focusing on Sexual Exploitation and Abuse

Haiti

Project Title		
Preventing Sexual Exploitation and Abuse in Internally Displaced People Camps in Post-Earthquake Haiti		
Location	**Duration**	**Geographic area covered**
HAITI	April 2010 to November 2010 (6 months)	Port-au-Prince: 8 camps Leogane: 2 camps
Implementing Agencies	**Number of Project Staff**	**Number of beneficiaries reached**
United Nations Stabilization Mission in Haiti (MINUSTAH), OCHA, Haiti Response Coalition, Lutheran World Federation, World Vision, International Organization for Migration (IOM), Groupe d'Appui aux Repatriés et Réfugiés (GARR), RACAVIL (Haiti), Save the Children UK, and other organizations	One full-time PSEA Coordinator	Port-au-Prince: Leogane:
General Project Summary		
Over 1000 camps were established since the January 2010 earthquake that left 6.1 million people homeless in Haiti. Implementation of the project followed after rumors of sexual exploitation and abuse (SEA) by humanitarian aid workers immediately after the earthquake. Prevention from sexual		

exploitation and abuse initiatives began quickly in the aftermath of the earthquake, with the appointment of a PSEA Coordinator. Unfortunately, the PSEA Coordinator role was terminated 6 months after the initiative got underway. Beneficiary profile consisted of internally displaced people living in numerous refugee camps in Port-au-Prince and surrounding areas. [4]

Most camps had Camp Committees who managed camps and were formed through self-nomination or set up by humanitarian organizations. Implementation of the project was done by NGOs and through Camp Committees. A few organizations introduced a protection officer, who regularly monitored the camp, or discussed the issue of SEA in regular meetings with camp committees or residents.

PSEA initiatives took place in various forms but all aimed at education, safety, and prevention. PSEA efforts were not intergraded within the GBV prevention initiatives already in place (please refer to the Project notable outcomes section).

Project Design

Consultation and awareness raising initiatives on GBV, SEA, violence, and safety issues took place within many of the camp communities by international and local NGOs. However, there was lack of involvement by the beneficiary community on the design of the reporting mechanisms. By the end of the project many camps did not have formal reporting channels for sexual exploitation by humanitarian aid workers.

Interagency Complaint Referrals

Save the Children, Lutheran World Federation (LWF), and World Vision, with the support of the Humanitarian Accountability Partnership (HAP), initiated a process for developing a Joint Complaint and Response Mechanism (JCRM) on quality of services delivered by aid agencies, staff, and volunteer behavior (including allegations of corruption, misconduct and sexual abuse and exploitation).[5] To be piloted in the St. Therese camp,[6] the initiative was not launched because the land owners evicted all camp residents. Nonetheless, the agencies planned to adapt and apply the process, tools, and learning to other camps where they were working.

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[4] http://www.un.org/en/pseataskforce/documents/interaction_adressing_psea_haiti.pdf
[5] http://www.hapinternational.org/pool/files/collaboration-and-innovation-developing-a-joint-complaint-and-response-mechanism.pdf
[6] http://www.hapinternational.org/projects/field/hap-in-haiti.aspx

Beneficiary Awareness of Complaint Mechanism
Little consultation and awareness raising took place by organizations on safety issues and sexual exploitation. It is not clear that they also raised awareness on the complaint process. One international and two local NGOs involved in the case study stated they had conducted awareness raising activities on GBV and on all forms of abuse and exploitation. Additionally, at one camp three organizations collaborated together on protection efforts and organizing focus group discussions (FGDs). Such FGDs focused on safety issues, including sexual exploitation. Around 40% of beneficiaries consulted received information or were involved in SEA discussions by five organizations. Roughly, 70% of beneficiaries consulted have heard about the risk of SEA from humanitarian aid workers on radio broadcasts or through camp gossip. No measurements on beneficiary understanding of CBCM were assessed. No beneficiary understanding of reporting channels was assessed.

Beneficiary Satisfaction Levels
Measurements on the satisfaction or positive outcomes for beneficiaries as expressed by beneficiaries were not assessed.

Incident Reporting Type, Channels, and Levels
The case study highlights 5 incidents that took place in the immediate aftermath of the earthquake before PSEA initiatives were implemented: - Offer of a replacement tent for sex - Sex for work - Consensual sex between a resident and UN soldiers - Rape of a young girl who asked a staff for a lift back to her camp Through the inter-agency JCRM, complaints could be submitted via three channels: a complaints box, via the camp committee who would capture them in a log book, or via agency staff visiting the camp.[7] Please refer to Annex 1 for more information.

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[7] http://www.hapinternational.org/pool/files/collaboration-and-innovation-developing-a-joint-complaint-and-response-mechanism.pdf

The Haiti Response Coalition designed a hotline for reports that would refer callers to the appropriate services and NGOs if the reports were incidents concerning their staff. No details on number of incidents reported through the hotline.

One local NGO setup monitoring committees in 10 camps, which assessed (no figures provided) that the overwhelming majority of sexual and abuse cases were perpetrated by other camp residents, secondly UN personnel, and thirdly NGO staff.

Training of Participating Agency Staff

A PSEA Coordinator was assigned under the auspices of OCHA to assist in Protection from Sexual Exploitation and Abuse efforts by the UN and NGO actors. Set up the In-Country Network, conducted trainings for the agencies' focal points, and developed a common action plan. Specific numbers of trained staff not assessed.

Children focused NGOs had measures in place to tackle SEA of children by personnel or the wider community. The measures included codes of conduct, induction, and training for all staff and volunteers. International organizations had codes of conduct for expatriate personnel but not for local personnel. Training and induction limited. One UN body involved in case study provides induction on PSEA to all staff arriving in Haiti.

Focal points received one day training on focal point responsibilities and stronger accountability in reducing the risks of corruption and sexual exploitation and abuse by HAP.

Notable Project Outcomes

Positive:

- The placing of protection officers in their camps by an INGO worked well for raising the awareness of SEA and GBV, as well as providing a platform for discussion.
- Speed of adding a PSEA coordinator.
- Organizations focused work on vulnerable populations, such as women and children.
- UN body involved in case study provides induction on PSEA to all staff arriving in Haiti.

Negative:

- Separation of initiatives on GBV and PSEA left SEA perpetrated by others than humanitarian workers without organizational responsibility.
- Beneficiaries were not consulted on project planning and risks.
- The lack of a formal reporting mechanism in many of the camps resulted in ambiguity on actual incidences of SEA by humanitarian workers.
- Insufficient consultation with beneficiaries, which resulted in for example: misunderstanding of definition of humanitarian worker. Beneficiary defined humanitarian worker as a paid national or international staff rather than the IASC's broader definition.[8]

Sustainability Factors

Sustainability was not achieved due to the following factors:

- Sustainability was insured by placing the PSEA Coordinator soon but jeopardized when the position was terminated too quickly.
- Many organizations had been conducting SEA and GBV awareness before the earthquake emergency. It still remains unclear whether the efforts and learning on GBV and SEA conducted before the earthquake helped SEA efforts after the earthquake.
- Because the Haiti Response Coalition used community mobilizes to visit camp communities to discuss concerns and specific cases on violence and abuse did not go ahead sustainability was jeopardize.
- Violence and abuse monitoring committees proved to be ineffective when working through the camp committees because some camp committee staff were perpetrators of abuse and exploitation and rarely reported SEA.

Transferable Project Outputs

- The creation of a joint complaint and response mechanism that promoted interagency collaboration and beneficiary accountability.
- Key points to communicate with staff, community, and committee including a flow chart diagram on how to report complaints.
- Induction on PSEA to all staff arriving in emergency zone by UN agencies. This allowed for staff to have a common understanding of the norms and behaviors expected by those workers.

Project Gaps

Project felt short on:

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[8] The IASC Task Force on PSEA reporting in 2002 defined 'humanitarian workers' as including 'all workers engaged by humanitarian agencies, whether internationally or nationally recruited, or formally or informally retained from the beneficiary community, to conduct the activities of that agency.'

- Beneficiary involvement on project activities, planning, and risks.
- A formal reporting complaint mechanism in many of the camps, which resulted in ambiguity on actual incidences of SEA by humanitarian workers.
- Exit strategy or project sustainability plan when PSEA coordinator was removed.

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HAP 2010. Collaboration and innovation-developing a joint complaint and response mechanism in Haiti. http://www.hapinternational.org/pool/files/collaboration-and-innovation-developing-a-joint-complaint-and-response-mechanism.pdf.

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InterAction 2010. Addressing Sexual Exploitation and Abuse within the Humanitarian Community in Haiti: Statement by the InterAction Sub-Working Group on Sexual Exploitation and Abuse. http://www.un.org/en/pseataskforce/documents/interaction_adressing_psea_haiti.pdf.

Kenya

Project Title
Prevention of Sexual Exploitation and Abuse in Kenya Refugee Camps

Location	Duration	Geographic area covered
KENYA Dadaab and Kakuma refugee camps and refugees in Nairobi	2004 – 2006 (three years) Funded by BPRM (US) Bureau of Population, Refugees and Migration	Kakuma - sprawling camp in four different sites Dadaab Refugee Camp = 3 sites - Dagahaley, Ifo and Hagadera

Implementing Agencies	Number of Project Staff	Number of beneficiaries reached
15 agency signatories of the Kenya Code led by a Consortium of 4 agencies: IRC, CARE International, FilmAid and UNHCR.	Information not provided but as indication of number of staff – one agency LWF/DWS alone has 184 national Kakuma-based staff and 1,619 refugee incentive workers & temporary employees on short-term contracts.	Kakuma = 61,708 registered refugees in June 2007 Dadaab Refugee Camp = 173,409 refugees in June 2007

General Project Summary
Preventing Sexual Exploitation and Abuse in the Kenya Refugee Program was designed to support implementation of the *Code of Conduct for Humanitarian Workers in the Kenya Refugee Program* (Kenya Code). The Kenya Code to strengthen complementary programmatic and operational initiatives to prevent and respond to cases of sexual exploitation and abuse of beneficiaries perpetrated by members of staff. Anticipated project outputs included: enhanced interagency partnership and coordination on PSEA, agency focal points equipped with skills for PSEA, improved accessibility of SEA complaint avenues at camp level, PSEA awareness raised in schools, consensus among community leaders about their role in

PSEA, Survey tool available for assessing community awareness of their entitlement and protection, enhanced participation of community and provincial administration in PSEA, agency mainstreaming PSEA plans in place.

Aim of project included to share lessons with partners within region by providing technical support (DVDs, manuals).

PSEA awareness raising with the police force and mainstreaming protection into police training curriculum all levels.

Project Design
Project written by an international agency without or with little consultation with refugee community or wider NGO community operating in the camps.

Interagency Complaint Referrals
No information on interagency referrals. Reports state that there is some confusion over agency internal reporting mechanisms. Referral and other coordination of complaints was not covered in the agreement between project consortium members.

Beneficiary Awareness of Complaint Mechanism

Awareness-raising of SEA and reporting mechanisms was through several means – via orientation of teachers and teaching in school, ToT to community leaders, community meetings and a film shown in local languages.

Knowledge, Attitude, Practice and Behavior (KAP&B) survey was undertaken (2007) with 1,000 camp members including incentive workers in the two camps – showed little awareness of available NGO complaint mechanisms.

Complaint mechanisms used by community in Kakuma are: 1) social service NGO refugee staff within communities; 2) community leaders; 3) the police; and 4) the NGO which employs the alleged perpetrator. Although 10 complaints boxes were erected– 6 in Kakuma and 4 in Dadaab they are not

used for SEA (in Kakuma)[9]

Beneficiary Satisfaction Levels
A detailed KAP&B survey was undertaken in 2005 and 2007 (Xefina consulting, Nairobi) results showed a general lack of trust and confidence in the reporting system due to fear of retaliation and lack of trust in level confidentiality. 72.7% of nationals and 73.5% of incentive workers knew about a system of reporting. When questioned as to whether the complaint mechanism was effective, 54.6% and 53.1% respectively admitted that it was useful (Kakuma).

Incident Reporting Type, Channels, and Levels
No records of reports made and referrals.

Training of Participating Agency Staff
Focal points were trained (A total of 15 members in Kakuma and 12 in Dadaab received training in the final year 2006), but no mention of investigators being trained. National aid workers and incentive received training on SEA. All humanitarian aid workers considered the training to be useful.

Sustainability Factors
Sustainability was not achieved due to the following factors: - Staff turnover resulted in some activities left 'hanging.' Organizations must to remedy this issue. - Camp structures and refugee community such as youth and women groups need to have

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[9] Complaints boxes might one day be a fifth option. At present they are not often used and certainly *not* for reporting sexual exploitation and abuse.

ownership of the PSEA project.

Involving teachers was one method to improve sustainability – in total in 2007, 60% of all teachers have received PSEA training and PSEA campaign materials are being integrated into the teaching curricula (in Kakuma). An evaluation report highlighted need to include a national organization in the project to support sustainability.

Transferable Project Outputs

Materials

- Training manual on SEA for humanitarian workers and focal points (can be adapted) PSEA training manual
- The Kenya Refugee Program. Prevention of Sexual Exploitation and Abuse Police training module– a trainer's guide police module - trainers guide
- 'No Excuses' video series (FilmAid) on PSEA - Film facilitator's guide film facilitator's guide
- Standard Operating Procedures for PSEA SOPs Kakuma

Innovative ideas: the individual salary sheets of local staff included information urging employees to report all cases of suspected sexual exploitation and abuse in the workplace (LWF, Kakuma 2006).

Project Gaps

Project fell short on:

- Clear defined objectives, baselines, performance indicators and standardized monitoring and evaluation tools.
- Involvement of national organizations in the project management as well as Government.
- Ensuring consistent information dissemination across agencies and camps especially on reporting mechanisms.
- Inclusion of the elderly and children (less than 12yrs).

References:

Final Evaluation - Preventing Sexual Exploitation and Abuse (PSEA) Project. Report to International Rescue Committee Revised September 2007, Xefina Consulting, Nairobi, Kenya.

Preventing Sexual Exploitation and Abuse (PSEA) Project: KAPB Survey Results. Report to International Rescue Committee, Revised September 2007 Xefina Consulting, Nairobi, Kenya.

HAP 2007. To complain or not to complain: still the question Consultations with humanitarian aid beneficiaries on their perceptions of efforts to prevent and respond to sexual exploitation and abuse. Principal author: Kirsti Lattu.

HAP 2010. Change starts with us, talk to us! Beneficiary perceptions regarding the effectiveness of measures to prevent sexual exploitation and abuse by humanitarian aid workers: a HAP commissioned study. Authors Corinne Davey, Paul Nolan, Dr. Patricia Ray.

Liberia

Project Title		
Prevention and Response to Sexual Exploitation and Abuse in Liberia		
Location	**Duration**	**Geographic area covered**
LIBERIA	September 2006-Present (?)	Lofa County- 9,982 km^2 Nimba County- 11,551 km^2 Montserrado County- 1,909 km^2
Implementing Agencies	**Number of Project Staff**	**Number of beneficiaries reached**
Countering Sexual Exploitation and Abuse in Liberia (CiSEAL), a collaborative initiative of the International Rescue Committee (IRC), the American Refugee Committee (ARC), Christian Children's Fund (CCF), and Save the Children-UK (SCUK); Government of Liberia (GoL); In-Country Network (ICN), a network of UN representatives and INGOs)	UN Prevention of Sexual Abuse and Exploitation Coordination Officer CiSEAL Project Coordinator 15 County Gender Coordinators	
General Project Summary		
The prevention and response to sexual exploitation and abuse in Liberia aims to reduce sexual and gender based violence (SGBV) including sexual exploitation and abuse (SEA) among young girls and women. It uses a multi-sector and multi-agency framework with intervention in the areas of economic empowerment, medical, legal, security and protection, and coordination. Awareness and prevention efforts began in December 2006 with the launch of a National SEA Awareness campaign led by the		

Government of Liberia (GoL).

The *Countering Sexual Exploitation and Abuse in Liberia (CiSEAL)* is a collaborative initiative that aims to raise awareness among the INGOs and local NGOs about SEA from September 2006 to December 2007. CiSEAL established a coordination unit and resource center providing technical support, educational material, and training to INGOs and the GoL in an effort to promote common definitions, development of Codes of Conduct (CoC), protocols, and procedures, including mutually accepted mechanisms for the investigation, reporting, and referral of SEA violations. The initiative also helped facilitate liaison, coordination, and collaboration with the UN and its agencies. [10]

The community based complaint mechanisms are set up within the broader framework of government SGBV awareness-raising within communities. The Government of Liberia, the UN, and INGOs agreed on incorporating SEA and GBV in order to avoid varying entry points into the issue of SEA. Such incorporation resulted in greater effort and coordination among agencies.

Project Design

The CBCMs are set up at county level. [i] Although most counties have similar problems, complaints are channeled differently in various counties.

Beneficiary community involvement in the development of CBCMs has been insufficient to date. Community engagement has been isolated with the majority consisting of consultation rather than participation.

Interagency Complaint Referrals

The CiSEAL initiatives attempted to establish common protocols for cross agency reports to be used by UN agencies, GoL, INGOs, and LNGOs however, it was not followed through due to concerns among organizations. Information of further interagency complaints not found, however the In-County Network developed a referral toolkit containing county specific support services, for use by FPs. The toolkit contained a mapping of referral systems (psychological, legal, protection, medical) and a common referral form.

In a cross-county study, over 65% of 324 beneficiaries surveyed had limited knowledge of the referral

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[10] IRC CiSEAL report.

pathway to report SEA.

Beneficiary Awareness of Complaint Mechanism
The GoL assumed responsibility and leadership to launch a long-term National SEA Awareness campaign. The national SEA campaign aimed to improve knowledge on SEA prevention and response through the training of civil society organizations, the education, law enforcement and the justice sectors. Used various media outlets to raise SEA awareness, including radio and newspaper messaging, and mass awareness activities in communities.   CiSEAL conducted 48 Focus Group Discussions (FGDs) that reached 677 participants in the Lofa, Nimba and Montserrado counties on complaint mechanisms. The first round of FGDs was a 3 month effort through a Survey on Knowledge and Attitudes on SEA. The second round was a one month effort to assess community perceptions on SEA and ways to establish reporting mechanisms in the counties.   However, despite the existence of proper reporting mechanisms in the counties, many did not understand how to report SEA cases.

Beneficiary Satisfaction Levels
The CiSEAL Survey on Knowledge and Attitudes Survey revealed that there are many reasons people do not report, including: -Fear of stigma that would come if they report an incident -Fear of losing benefits because perpetrator will lose their job -Lack of confidentiality in the complaint mechanism -Fear of nothing coming out of reporting a case -Communities felt no action would be taken, which decreased desire to report.

Incident Reporting Type, Channels, and Levels
No information was found on the kind of reports made (sexual, service-related, etc) and whether or not there was an actual increase in number of reports received for participating agencies.   Reporting channels vary from county to county. To varying degrees, complaints channels consisted of boxes, contact numbers, and email complaint mechanisms. Survivors have various entry points for reporting SEA cases through which most cases might be resolved without police or judicial involvement. Some of these entry points could be human rights institutions,

women organizations, medical personnel, and clearing houses. If the stakeholders prove that a crime was committed, the police and the court will be brought in. The clearing houses in various counties gather complaints and coordinate activities of the different channels and provide feedback to the survivor. Clearing houses consist of GoL County Gender Coordinators and lead GBV organizations.

Training of Participating Agency Staff
The CiSEAL project conducted 9 trainings for over 300 participants from local NGOs and INGOs on investigation procedures, Focal Points (FP), and Senior Management training. With the help of Building Safer Organizations (BSO), CiSEAL investigation procedures training incorporated the minimum standards of the SGB and the procedures outlined in the *Model Complaints and Investigation Protocols*. Aimed to equip staff to conduct investigations into allegations of staff misconduct related to SEA. Seventy-nine (79) representatives from GoL, LNGOs, and INGO community were trained as FPs. Focal Point training aimed to train focal points to conduct PSEA trainings; explain and describe power differentials, deal with SEA cases, etc. Twenty (20) managers were trained, 9 from INGOs and 11 from LNGOs. Training goals were to train managers on how to manage investigations into allegations of staff misconduct, particularly involving SEA and to identify safeguarding strategies to implement in their organizations.

Additionally, government representatives from the Ministries of Agriculture, Public Works, Internal Affairs, Rural Development, Commerce, Industry, Transport, Justice, Education, Planning and Economic Affairs, Finance, Labor, Health and Social Welfare, and Gender were also trained.

From 2005-2008, a total of 1627 UN staff members and representatives of implementing partners have been trained on SEA under the Conflict And Discipline Unit. |

Notable Project Outcomes
Positive

- Regular SEA training sessions conducted for UN agency staff, contractors, NGOs, and INGOs
- Enhanced information sharing between UNMIL Focal Point Network, ICN, and government coordination mechanisms such as GBV Task Force and the Protection Core Group (PCG)
- Development of common reporting templates and ensuring that members have functioning reporting systems

Negative

- Despite the numerous training sessions, awareness raising activities and outreach efforts, the |

level of SEA reporting remains low
- Low response rate and follow up of non-SEA reported cases among members. Only 30% of cases reported in 2007 received follow up and response
- Weak law enforcement and judicial sectors are unable to adequately play their role in protection
- SEA campaign survey found that many community members still do not know or understand how to report SEA

Sustainability Factors

Sustainability of project has been enhanced because:

- The coordination and collaboration between agencies provided for an institutionalized SEA framework within GBV.
- Activities were jointly developed and led by national authorities, who used existing government structures for PSEA awareness, coordination, monitoring and reporting.

Transferable Project Outputs

Training Materials:

- *SEA: Sexual Exploitation & Abuse-CiSEAL Training Video and Manual* – 4 short films for participatory training that targets agencies with little information on SEA
  -Educators Module Packet from UNICEF and CFF – used to community awareness, training packet for schools/students, and trainer's packet for focal points in schools and NGO community

Awareness Tools:

- Bumper sticker – *No Sex for Help, No Help for Sex.*
- T-shirt– *No Sex for Help, No Help for Sex.*
- Orange Wrist Band – *No Sex for Help, No Help for Sex*
- Poster – *Stop Sexual Exploitation and Abuse: No Sex for Help, No Help for Sex*

The surveying of beneficiaries and staff to access awareness and understanding of PSEA.

Project Gaps

- Lack of funding for PSEA Coordination Officer Position or related PSEA activities

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International Rescue Committee Liberia 2008. Countering Sexual Exploitation and Abuse in Liberia (CiSEAL) Final Report.

Thailand

Project Title		
Preventing Sexual Abuse and Exploitation in the Thai/Burma Border Refugee Camps		
Location	**Duration**	**Geographic area covered**
THAILAND	September 2007 to October 2010	800 km of Thai-Burma Border: Refugee camps: Ban Mae Surin, Ban Mai Nai Soi, Mae Ra Ma Luang, Mae La Oon, Mae La, Umpiem Mai, Nu Po, Tham Hin, Ban Don Yang.
Implementing Agencies	**Number of Project Staff**	**Number of beneficiaries reached**
Committee for the Coordination of Services to Displaced Persons in Thailand (CCSDPT) includes 18 NGOs (TBBC, IRC, JRS, Solidarites, WEAVE, World Education, ARC, Right to Play, Malteser International, COERR, Handicap International, DARE, PU-AMI, TOPS, ADRA, SVA, ZOA) Other implementers are the 12 camp-based Community CBO partners.	One full-time Project Coordinator and up to four field support staff (trainers). Staff within the individual CCSDPT agencies and CBOs.	Total indirect approx. 148,000 Total direct: 4,695 beneficiaries, camp-based staff, camp leadership
General Project Summary		
The goal of this project was to provide an environment where refugees, particularly those most vulnerable in their communities, know they are able to access services free of abuse and exploitation. The project supported the implementing agencies of the CCSDPT and CBO partners to strengthen programmatic and operational initiatives to prevent and respond to cases of sexual abuse and exploitation of beneficiaries.		

This included developing an interagency PSEA protocol and staff Code of Conduct (CoC) for CCSDPT members and a CoC for CBOs, establishing a PSEA reporting and investigation mechanism that meets international standards, raising awareness among beneficiaries about their rights, entitlements and knowledge of the CCSDPT and CBO SEA CoC. Mechanisms were also put in place to prevent and respond to SEA, including PSEA induction procedures for staff and training for investigators.

Project Design

No involvement of beneficiary community in design of project activities or in monitoring. Beneficiaries were involved later in the design of awareness raising materials and in design of the CBO CoCs.

Interagency Complaint Referrals

Inter-agency Protocol set up - Protocol V covers Inter-agency coordination in situations when an agency receives a complaint about another CCSDPT Member. Referral depends on beneficiary wishes. The protocols were endorsed by all CCSDPT agencies, in collaboration with UNHCR, IOM.

Beneficiary Awareness of Complaint Mechanism

Project activities during the second year included formal awareness-raising of camp CBO representatives, but not with the wider camp population. CBOs including youth groups, media groups were involved in the design of messaging for PSEA – including zero tolerance messages in local language on caps and bags and through theatre and radio broadcasts. Full day of training provided on preventing and responding to SEA for 342 persons from key organizations and in-camp administration/governance bodies.
Awareness was assessed through two large-scale knowledge, attitude and practice (KAP) surveys carried out involving interviews with over 600 camp residents across several camps.

Beneficiary Satisfaction Levels

Survey led by the Project Coordinator in 2010 of community satisfaction with CCSDPT Management of PSEA Services and the Project. Results show that 73% of the 438 camp residents were satisfied with the level of project consultation with beneficiaries. There was also Community perception that SEA now significantly reduced.

Incident Reporting Type, Channels, and Levels

Compilation of incidents not available for all years.

Twelve (12) cases were reported within the CCSDPT between Oct 2009 and Feb 2010. Allegations reported and investigated have mostly been rape and sexual exploitation. Almost 50% subjects of complaint are camp-based staff, almost 50% of victims under 18 years-old. Twenty five (25%) of subjects of complaint are drivers.

Training of Participating Agency Staff

Eighty (80) staff of CBOs and NGOs were trained as PSEA focal points. Three hundred and 50 (350) staff were trained on PSEA. Forty six (46) staff were trained on conducting investigations; some in this group were trained on preliminary investigations.

Notable Project Outcomes

Positive:

- CCSDPT interagency PSEA protocol has been agreed by all members
- CCSDPT Code of Conduct and CBO CoCs are available in local languages
- Some integration of PSEA CoC and Protocols into individual agency policies & procedures - staff recruitment and induction
- Awareness raising activities carried out and material produced
- Community perception that SEA now significantly reduced

Sustainability Factors

Factors which contribute to the sustainability:

- Leadership and mission
- PSEA protocols and CoCs embedded in structures and processes at every level
- Staff induction on PSEA on-going
- Mainstreaming PSEA into protection activities - sustainable and cost-efficient esp. when resources limited.
- Active and engaged PSEA focal points or 'champions'

Factors that could be implemented to better improve chances of sustainability in this context:

- Communities involved in design, implementation or monitoring of project
- Active involvement of children - project needs to be tailored to suit their needs
- Beneficiaries' own indicators for success of PSEA are taken into account
- Camp languages and customs considered from start
- Regular reference by agencies to the inter agency PSEA protocols, CoC and PSEA checklist
- Adherence to Protocols and CoC included in an agency audit

- Embed PSEA into each agency's annual plan
- Inter-agency support – for joint training
- Open and effective communication between operational agencies

Transferable Project Outputs

- Preventing Sexual Abuse and Exploitation in the Thai-Burma Refugee Program Mainstreaming Checklist – February 2008
- CCSDPT Interagency PSEA protocols and CoC
- Example of CoC developed by CBOs in Thai/Burma context
    - o Karen Refugee Committee (KRC)-Code of Conduct
    - o The Karenni's (KnRC)-Code of Conduct
- Description of Sexual Abuse and Exploitation (SAE) Reporting Mechanism
- KAP survey methodology for PSEA and questionnaire

Project Gaps

The PSEA project on the Thai-Burma border contained the following gaps:

- Consultation with community-based organizations and beneficiaries at the start of the project was insufficient and damaged the impact and sustainability of the project.

- By project's end, there remained confusion amongst beneficiaries and agency staff on how to bring a concern forward.

- There was insufficient consultation with vulnerable groups, such as single women, and children, and new arrivals, on design of project and its implementation.

- General PSEA-awareness and use of the reporting channels waned once dedicated resources for the project were no longer there.

References:

HAP 2010. Change starts with us, talk to us! Beneficiary perceptions regarding the effectiveness of measures to prevent sexual exploitation and abuse by humanitarian aid workers: a HAP commissioned study. Authors Corinne Davey, Paul Nolan, Dr. Patricia Ray.

South Sudan

Project Title		
Pilot Complaints and Response Mechanism (CRM) in Mornei		
Location	**Duration**	**Geographic area covered**
Mornei , West Darfur	Sept 2011 -	Five camps in Mornei (Amtidat East, Amtidat West, Elgabal, Elwadi and Elsalaam)
Implementing Agencies	**Number of Project Staff**	**Number of beneficiaries reached**
Concern Worldwide	Concern Programme Coordinator, Assistant Country Director- West Darfur , Program Support Officer, Assistant Area Coordinator- Mornei, Community Services Officer, Support provided by Concern's Global Humanitarian Protection Advisor and 32 field level staff in Mornei	Total of 60,000 – 70,000 camp residents
General Project Summary		
Mornei includes 68,000 IDPs from 170 villages in the Zalingei, El Geneina, and Wadi Salih localities and representatives from Fur, Maasalit, Zaghawa, Tama, Gimir, Dagu, and Tawara ethnic groups. Concern and other NGOs and agencies provide humanitarian relief including food assistance, water and sanitation, non-food items and protection to camp residents. Accountability to beneficiaries and stakeholders is an integral part of Concern's Global Strategic Plan 2011-2015. The establishment of the CRM pilot initiative began with the training of a number of key staff members in August 2011 and led in September 2011 to an internal paper detailing the objectives, design, implementation and monitoring and evaluation of the proposed Complaint and Response Mechanism Pilot in Mornei, West Darfur.		

Project Design

The CRM pilot design was based on information gathered from 3 focus group discussions with humanitarian actors, 8 community meetings and a meeting with 15 community leaders in Mornei and Rongataz. Concern's staff in Mornei also conducted a total of 18 community consultations involving Concern beneficiaries and non-beneficiaries, community leaders, community/special interest groups and key humanitarian agencies, including government authorities. The consultations evaluated the community's engagement with existing complaint mechanisms and examined opportunities available to Concern's CRM.

Following consultation with community members and other stakeholders, the project identified and included 3 main complaint channels:1) complaint box 2) via Concern staff or community volunteers, or 3) via community leader (Sheiks) who then share complaint with Concern staff

Complaints boxes were then placed in Rongataz camp, and each of the five camps in Mornei (Amtidat East, Amtidat West, Elgabal, Elwadi and Elsalaam). Boxes are locked with two padlocks and opened jointly by a Concern staff member and a community representative.

On receipt of a complaint, a form is completed by the Community Services Officer (CSO) and a receipt issued to the complainant, where possible. Each complaint form contains a unique reference code which matches to the code used in the database. Each complaint is then added by the CSO into the CRM database (Microsoft Excel sheet) developed to track all complaints received from the community and responses provided by the agency. Lodged complaints are then reviewed twice a month by a Complaints Committee consisting of three Concern staff members from the Mornei office.

Interagency Complaint Referrals

In light of the absence of a formalized CRM among humanitarian agencies in Mornei and Rongataz and given the highly politicized nature of humanitarian assistance in Mornei, Concern has taken the decision not to engage in the referral of complaints related to the decisions or actions of another organization. Instead, the complainant will be advised to direct their complaint to the relevant organization.

Beneficiary Awareness of Complaint Mechanism

Sensitization of the community took place during a week of house to house campaigning.

Beneficiary Satisfaction Levels

Findings from an evaluation which included gathering information from focus groups discussions with 20 women and men, and 12 community leaders revealed that the community's preferred method of lodging a complaint was through the complaint boxes, as they felt this was a 'safer' method than raising complaints in person with Concern staff. However, while communities were appreciative of the objective of the CRM, many knew very little about the CRM and were distrustful of the process. Also there was lack of satisfaction with the level of response (*Concern Worldwide Sudan, Internal Evaluation of CRM, West Darfur, March 2011)* it was also noted that high levels of illiteracy was a significant barrier to the use of the

complaint box by women.

- 60% of the complaints concerned quantity and quality of services provided, 38% concerned with beneficiary selection process, and 2% were regarding Concern staff.

- 90% complaints concerned the NFI sector, 10% nutrition sector - mainly requests for help and support, with most of the complaints regarding the beneficiary selection criteria for the NFI program.

- 84% of complaints were from females, with 16% lodged by males.

- 85% of the complaints were considered to be valid, and 15% invalid because they did not relate to Concerns programming.

- Source of complaints were Complaint boxes (98%), via CRM focal point in the Concern office, and finally through Concern field staff.

- 92% of complaints received were resolved within two weeks, 8% were not resolved because they were recently received.

Female beneficiaries are reluctant to report inappropriate behavior from the staff (although none was recorded) - effectiveness of reporting and responding to sensitive complaints through the CRM is problematic, due to widespread existing social barriers.

Training of Participating Agency Staff

In April, 2011, the Assistant Area Coordinator- Mornei, Systems Manager for West Darfur and Assistant Country Director for South Kordofan attended a four day CRM workshop, facilitated by the Humanitarian Accountability Partnership.

Prior to conducting community consultations, the Assistant Area Coordinator- Mornei delivered a one day training on purpose and scope of a CRM to program and systems staff in Mornei.

Training in August 2011 was provided to key staff including Mornei's Assistant Area Coordinator and 32 other staff members.

The project includes identifying and sensitizing focal points in other organizations to safely refer complaints to Concern.

Transferable Project Outputs

- Concern Worldwide West Darfur Program, Sudan, Paper on Complaint and Response Mechanism Pilot, Mornei, West Darfur, September, 2011
- CWWD Mornei Complaint Form v5
- CWWD CRM Fact Sheet v1 to be used by Concern staff and volunteers when engaging in

community sensitization sessions

- Complaint mechanism FGD Questionnaire
- information on Complaint Boxes
- Information Sharing – explaining type of project information to share with camp residents, including their right to complain
- CRM flow chart – describing the CRM process

Project Gaps

- Low level of staff awareness of the CRM or aware but unclear of process
- Low beneficiary awareness of the complaint process and understanding of what constitutes a valid or invalid complaint and dissatisfaction with level of feedback to complaints lodged
- Most vulnerable groups - female headed households (especially widows), orphan headed households, and the elderly had little information about the CRM
- Resources including staff time- leading to some delays in responding to complaints

For further Project information Contact:

Laura Cometta, Concern Worldwide

Sources:
- Concern Worldwide West Darfur Programme, Sudan, Paper on Complaint and Response Mechanism Pilot, Mornei, West Darfur, September, 2011

- Internal Evaluation of Pilot Complaints and Response Mechanism (CRM), Mornei and Rongataz IDP Camps, West Darfur, Sudan. March 2012. Concern Worldwide

VII. Individual Integrated Community-Based Complaints Mechanisms, PSEA Specific

Democratic Republic of Congo

Project Title		
Complaint Mechanisms Guide in the Democratic Republic of Congo		
Location	**Duration**	**Geographic area covered**
Democratic Republic of Congo	Information not found	Masisi, North Kivu
Implementing Agencies	**Number of Project Staff**	**Number of beneficiaries reached**
Concern Worldwide	Information not found	Information not found
General Project Summary		
This complaint mechanism is equipped to deal with corruption, power abuses and exploitation of vulnerable groups (such as unaccompanied or single women) allegations brought forth by Concern's staff and beneficiaries. Concern enumerates accountability to beneficiaries and quality assurance of programs as two main goals for the establishment of a complaint mechanism in Masisi. The CBCM is also equipped to deal with non-PSEA related concerns, such as quantity and quality of service. The guide strongly suggests building upon existing methods such as participation of beneficiaries and communications strategies to enhance the establishment of the complaint mechanism. The guide lays down key principles, types of complaints to be received, and means of complaining, ways to collect verbal complaints and to ensure confidentiality. The guide also includes internal mechanisms to address complaints, responsibility of partner agencies and Concern's senior management.		

Project Design
The Masisi complaint mechanism guide was informed by a pilot conducted in 2010 in seven villages in Dubie (Katanga) for a period of 8 months. An evaluation was conducted in May 2011, the lessons learned and recommendations informed the creation of the complaints mechanism in Masisi.
Beneficiary Awareness of Complaint Mechanism
Consultations and discussions with the community were conducted. These consultations lead to the establishment of the complaint mechanism tailored to the community of Masisi centered on feedback.
Incident Reporting Type, Channels, and Levels
This guide identifies two types of complaints. All complaints are registered, classed, and conserved with confidentiality.

Valid/delicates: violation of Concern's code of conduct, discrimination, fraud, corruption, violation of confidentiality, mingle in the politics of programs, complaints that put in danger reputation of Concern, security of staff and beneficiaries, and any criminal acts.

Non-valid/non-delicates: target and selection of beneficiaries, quality and quantity of services, lack of information, ways of working, level of presence of Concern's staff or partners in the community, access to services.

Complaint Channels (chosen by beneficiaries)

1) Telephonic contact with Concern
2) Staff visit in site/village
3) Point person/Focal Point in the community
4) Going to Concern's office
5) Via the village chef
6) Voice (message) recording
7) Complaints box in the village
8) Complaint box in Concern's office

Oral complaints

These types of complaints are dealt with meticulously by Concern, see annex for form used.

Levels of reporting

A 'Complaints Committee' is designated to receive, sort out, and address allegations. Delicate complaints are transmitted to the Country Director and non-delicates complaints are dealt with by the committee following Concern's guidance.

Notable Project Outcomes

Concern's institutionalization of the complaint mechanism in Masisi is commendable for the following reasons:

- On a monthly basis, a report on allegations received through the various channels is presented to the Area Manager
- All complaints are given a '*Reference Number*' to ensure follow up by both Concern and the complainant
- The guide offers guidance on communication to beneficiaries on the complaint mechanisms but also about their expectations from Concern
- Steps to follow by staff once a report is received are clearly described within the guide

This guide offers resources applicable for other agencies.

Transferable Project Outputs

Various resources at offered in this guide:

- Steps on how to step up a complaint mechanism
- Sample of questions for consultation with the community
- Log frame for complaint suggestion box
- Form – How to receive a complaint
- Form – How to register an oral complaint
- Terms of Reference for " Complaint Committee"
- Monthly report on allegations

Project Gaps
The guide does not mention how Concern staff and partners were trained, lessons learned after the implementation of the complaint mechanism, or referral path ways for beneficiaries.

Sources:

Concern Worldwide

Guide pour le Mécanisme de Traitement des Plaintes

VIII.   Integrated Joint Community-Based Complaints Mechanisms, Non-PSEA Specific

Study on Community-Based child protection mechanisms in Uganda and the Democratic Republic of Congo (DRC)

War Child began working in eastern DRC in 2010. In such, the organization commissioned this study as a way to investigate existing community-based structures, get a fresh prospective, and explore lessons learned by child protection actors active in Goma. The research focused primarily on reporting mechanisms for children.

Valuable Lessons learned:

Existing formal mechanisms

Child protection referrals and response developed by protection actors have contributed toward a strong functional child protection system in Goma. For example, the community-based approach *Réseaux Communautaires pour la Protection de l'Enfant (*RECOPEs) established by Save the Children prioritizes the promotion and defense of child rights, raising child protection awareness at the community level, and prevention, reporting, and advocating against abuses of children with partnership of local NGOs. [11]

Paying community members lessens chances of sustainability

Such practices by child protection actors can lead community-members to be less likely to participate if or when compensation is not offered and challenges long-term sustainable involvement. Agencies can instead offer access to literacy programs and income generating activities, and training opportunities to community members.

Engaging key community leaders and actors

Congolese religious networks and health centers in Goma are extremely knowledgeable of the protection needs of children, which could multiply protection efforts, direct response at the community-level, and reports of abuses.[12] Confidence in religious actors, by individuals and families, makes them crucial partners for any attempt to strengthen protective responses. Working with these groups can ensure change in attitudes and behaviors in communities.

Externally imposed protection structures can weaken local capacity

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[11] RECOP included representatives of partners associations, health workers, churches and women, comprising a committee of 40 individuals. The members of RECOPE were provided small operational materials such as papers, pencils as well as transportation money.
[12] According to the participants in the study, they prefer religious actors to solve family and community conflicts rather than local authorities who demand payment for their work.

War Child's research shows that imposing child protection structures risks setting up parallel systems and may not contribute to sustainable, locally-driven child protection mechanisms. Formal indigenous mechanisms[13], where they exist, should complement NGOs' complaint mechanisms.

While this study offers lessons learned on reporting mechanisms it doesn't offer a perspective on how national and international protection NGOs can build on each others' work to prevent and response to child protection needs in Goma.

Sources:

Final Report
Study of community-based child protection mechanisms in Uganda and the Democratic Republic of Congo

Prepared by War Child UK, September 2010
http://www.warchild.org.uk/sites/default/files/Community-based-child-protection-mechanisms.pdf

Complaint Handling in the Rehabilitation of Aceh and Nias

The non-governmental organizations and UN agencies response to the earthquake and tsunami in the Aceh and Nias communities in Indonesia offers valuable recommendations and lessons for the purpose of this compendium. The study, commissioned by the Asian Development Bank, evaluates non-PSEA specific projects, mostly shelter and infrastructure building activities. The examples provided offer valuable knowledge to organizations interested in designing and implementing systems to identify complaints and grievances during natural disasters.

Agencies working in Aceh and Nias communities offered various channels to report incident: Short messages services (SMS), walk-ins, monitoring field visits, mail, facsimile, and telephones. Incident reporting types were as follows: housing – delay and quality of construction; land administration problems – concerns over rehabilitation grants; land acquisition problems; corruption; prioritization of beneficiaries; and lack of supervision and control of consultants and contractors.

Recommendations and Lessons Learned:

Training of staff

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[13] Important lessons from the North Kivu experience of RECOPEs. Although this body was a representative sample of community leaders, members of the group viewed RECOPE as an *external structure* forced upon them by a foreign entity. Community members considered that they were doing the work on behalf of an internationally-supported NGO, which reportedly generated resentment of its voluntary nature when national NGO staff were paid.

Trainings must be conducted with all staff. These can be designed, adapted, and tailored as staff provides feedback. Trainings should clarify the roles and responsibilities of partner agencies and they need to inform communities on the mechanism. It is best to equip field staff with training on communication skills at the start and at regular intervals during the course of a project.

Senior management's commitment

Clear support and direction from senior management will ensure that the complaint mechanism is accepted and supported by consultants and project staff. The management must identify which units will take the lead, be responsible for monitoring and troubleshoot when the system is faced with constraints.

An understanding of social interactions in communities

Helps an agency understand how a complaint mechanism can empower a community and give people the courage to bring forth grievances and share feedback. It is important to clarify roles in the terms of reference, if a joint mechanism is being considered.

Community meetings

To manage gender and cultural issues, separate meetings should be held for men, women, and other vulnerable groups. This ensures for women and other vulnerable groups to develop and identify their own priorities. This study suggests that joint meetings involving men and women should be held whenever agencies and beneficiaries need to reach a final decision on community priorities.

Sources:
Complaint Handling in the Rehabilitation of Aceh and Nias

By Robert C. May
http://www.adb.org/sites/default/files/Complaint-Handling-Rehabilitation.pdf