<table>
<thead>
<tr>
<th>ACRONYMS</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>ARC</td>
<td>Audit Risk and Compliance</td>
</tr>
<tr>
<td>CD</td>
<td>Country Director</td>
</tr>
<tr>
<td>CFM</td>
<td>Complaint and Feedback Mechanism</td>
</tr>
<tr>
<td>CFMC</td>
<td>Complain and Feedback Mechanism Committee</td>
</tr>
<tr>
<td>DC</td>
<td>District Controller</td>
</tr>
<tr>
<td>DFC</td>
<td>Deputy Field Coordinator</td>
</tr>
<tr>
<td>DPM</td>
<td>Deputy Program Manager</td>
</tr>
<tr>
<td>FC</td>
<td>Field Coordinator</td>
</tr>
<tr>
<td>GBV</td>
<td>Gender Based Violence</td>
</tr>
<tr>
<td>GoB</td>
<td>Government of Bangladesh</td>
</tr>
<tr>
<td>HoD</td>
<td>Head of Department</td>
</tr>
<tr>
<td>MEAL</td>
<td>Monitoring Evaluation Accountability and Learning</td>
</tr>
<tr>
<td>NFI</td>
<td>Non-Food Items</td>
</tr>
<tr>
<td>HR</td>
<td>Human Resources</td>
</tr>
<tr>
<td>HQ</td>
<td>Headquarter</td>
</tr>
<tr>
<td>PNGO</td>
<td>Partner Non-Government Organization</td>
</tr>
<tr>
<td>PIR</td>
<td>Partnership and International Relations</td>
</tr>
<tr>
<td>PM</td>
<td>Program Manager</td>
</tr>
<tr>
<td>PO</td>
<td>Project Officer</td>
</tr>
<tr>
<td>PSEA</td>
<td>Protection from Sexual Abuse and Exploitation</td>
</tr>
<tr>
<td>SOP</td>
<td>Standard Operating Procedure</td>
</tr>
<tr>
<td>SPO</td>
<td>Senior Project Officer</td>
</tr>
<tr>
<td>TOR</td>
<td>Terms of References</td>
</tr>
</tbody>
</table>
1 INTRODUCTION
Receiving feedback from and responding to complaints from stakeholders is an important part of improving Action Against Hunger Bangladesh’s accountability and programming quality. Complaints and feedback can be received and processed through multiple channels but Action Against Hunger Bangladesh believes it is important to provide an objective and confidential complaints and feedback mechanism which is made available for all staff, beneficiaries and other stakeholders and has set up the Complaint & Feedback Management Committee (CFMC) to oversee this. This document outlines the objectives of the CFMC, how it is governed and the mechanism that it has designed to process complaints and feedback. It accompanied by various annexes which will be used to facilitate the effective workings of the CFMC.

1.1 Objectives of the CFMC
The CFMC has been set up to increase Accountability and Transparency of all Action Against Hunger actors engaged in serving beneficiaries (Staff of the Mission or HQ, Suppliers, Contractors, Consultants, Volunteers, Partners, etc.). More specially the CFMC aims:

✓ To ensure transparency and accountability in projects.
✓ To increase the sense of dignity & project ownership of beneficiaries and other stakeholders.
✓ To improve impact /effectiveness of projects leading to better outcomes.
✓ To reduce the opportunity/levels of corruption, nepotism and fraud.
✓ To ensure child protection & protection from sexual exploitation and abuse or any other Gender Based Violence or harassment at workplace.
✓ To increase trust between Action Against Hunger and partners, community and other stakeholders.

2 GOVERNANCE & MANAGEMENT
The CFMC is managed by a Committee which is appointed and chaired by the Country Director. Its composition will change depending on contextual circumstances and individual staff capabilities, but under normal circumstances will consist of three additional permanent members:

1) Head of Department- Audit, Risk & Compliance
2) Head of Department- Partnership & Institutional Relations
3) Manager, Complaint & Feedback Management (secretary of the committee)

Additional members may be asked to join the committee on a permanent or ad hoc basis to bring specific skills and/or viewpoints, and others may be asked to support the committee. The Committee will endeavor to have at least one female and one male representative.

The committee reports directly to and sends all findings and recommendations to the Country Director.
COMPLAINTS & FEEDBACK MECHANISM

3.1 Communication Channels
Complaints and feedback are processed through a variety of communication channels, which are made available to staff, beneficiaries and other stakeholders. These include via:
1. Email
2. Mobile phone
3. Letter
4. Verbal report
5. Complaints Box

Annex: Complaint Channels outlines the working of each of these channels. All communications will be processed by the CFMC Manager or another member of the CFMC Committee when the Manager is unavailable. Complaints can also be referred to the CFMC by the HR department or CD.

3.2 Categorizing Communications
When receiving such communications, the CFMC Manager is responsible for logging the communications (see MEAL section) and categorizing them into one of five categories which dictates how they will be processed.

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
<th>How Processed</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Complex complaints to be handled by CFMC</td>
<td>Complaints about staff, visitors and/or contractors of which nature represents a grave violation of Charter, abuse of power or fraud, SEA or GBV; where an investigation is likely to be required*</td>
<td>Sent to the CFMC Committee</td>
</tr>
<tr>
<td>2. Complaints that can be handled by HR</td>
<td>Complaints about staff, visitors and/or contractors of which nature represents a minor violation of Charter, abuse of power or fraud, or where is there is clarity over the culpability of the staff member in question (i.e. the staff member has confessed).</td>
<td>Sent to the Head of HR and keep the Country Director/Deputy Operations in Cc</td>
</tr>
<tr>
<td>3. Feedback</td>
<td>Information concerning the effectiveness of our programmes or ways of working</td>
<td>Sent to relevant HoD or Coordinator Keep the Program Director in Copy</td>
</tr>
<tr>
<td>4. Request for Information</td>
<td>enquiry how, when and where services are provided</td>
<td>Sent to relevant HoD, Coordinator or DFC</td>
</tr>
<tr>
<td>5. Not valid</td>
<td>No valid communications are those that do not fall into any of the above</td>
<td>Standard response provided (see annex)</td>
</tr>
</tbody>
</table>

3.3 Processing by Complaints
Once a complaint is passed to the CFMC or HR, an initial report is composed within 24 hours of receiving it which lays out whether or not the complaint is deemed serious enough to merit the CFMC process (HR can decide that the complaint merits a CFMC investigation and vice versa) and where any initial actions are required to ensure that an investigation can be carried out in an efficient and effective manner. This then protects the security and welfare of those involved and the integrity of any possible investigation. Action Against Hunger has the right to ask staff to go on administrative leave during an investigation. However, the Administrative leave should not exceed more than 7 workings days. For additional days of administrative leave, authorization from the Country Director would be required. During this time, they
receive full pay and benefits but must be available to speak to an Action Against Hunger staff in person or on the phone if needed.

If any GBV related complaints come, then the CFMC or HR will take action for necessary referral (psychosocial support, health or other necessary support) with the consent of staff.

As soon as the CFMC or HR initiates an investigation they must put together an investigation team and HR is responsible for informing the staff member that they are under investigation. From the moment that the staff member is informed, the investigation team has 7 days to complete its activities and makes its recommendations.

The CD may approve extensions to this investigation period, but they must be updated every 7 days on the investigations progress. The staff member under investigation should be informed in writing before each extension.

3.4 CDs Decisions & Show Cause

The results of an investigation are sent to the CD who makes the final decision on whether or what disciplinary action is appropriate. Once their decision is made, this is communicated first to the head of base to consider the programmatic and security impacts of such a decision. The decision is then presented to the staff member in the form of a Show Cause letter presented by HR.

The staff member has three calendar days to respond to the show cause. The response will then be sent to the CD who will make their final decision on disciplinary action. This will be communicated first to the head of base and then to staff member through HR.

3.5 Closing the Feedback Loop

Once any communication has been processed the CFMC is responsible for inputting all relevant information in to the CFMC database and then to provide feedback to the person that made the initial complaint.
Manager Complaints & Feedback Management

Submission Logged

HR Team
FOD is informed
Does the issue require investigation?
YES
Who is the appropriate body to investigate?
HR
CMU
HR Team informs staff
Investigation takes place & Report sent to CD
Does the CD support disciplinary action?
YES
HR Issues Show Cause
NO
YES
NO
Does the CD support disciplinary action?
YES
NO
HR Team informs staff
HR Team informs staff

PM Provides Written Response
Standard Response

Request send to PM & MEAL Team

Feedback of request for info
Not Permitted

Outcome Logged

BENEFICIARIES  STAKEHOLDERS  ACF STAFF

20 day to complete
4 KEY PRINCIPLES

4.1 MEAL & Quality Insurance

The CFMC Manager logs all communications that are received and is responsible for reminding the CFMC of the investigation time limits, as well as logging the results of all complaints (see Annex: CFMC Complaint Log). When a communication is categorized as a complaint a case folder is opened in the CFMC Folder on the NAS (confidential) and the file is saved with a new case number.

All complaints received by the HR department are similarly logged. Once a month these logs are sent to the CFMC to be complied and analyzed. This allows for the CFMC to report back to the CD and HR on trends in complaints and to assure that the CFMC is categorizing communications and that HR is referring complaints in an appropriate manner.

The resolution of any complaint should be reached within 20 days. This can only be extended if there is clear justification which has been approved by the CD.

4.2 Confidentiality and Protection

In a bid to respect the law on the protection of computerized personal data, the incident reports should not use the names of individuals involved in an incident but only their staff ID#. These recommendations are based on the French regulations aiming at the protection of personal, confidential and sensitive data and the supervision of their collection.

- No identification of individuals in Incident report Names and first names of the persons involved in an incident must not be indicated (victims, authors, witnesses...).
- The status (international, national, delocalized) and the gender can be specified.
- All complaints must be dealt with in confidence.
- Complaints records should be treated as confidential to safeguard sensitive information, upholding the principle of confidentiality.
- The complainant should be assured of not disclosing his/her information (Identity will remain anonymous) to any other person not involved in the feedback process.
- If the complainant is not willing to provide further info or if the issues can’t be moved forward without the complainant revealing themselves, the case can be closed with proper notice sent to the complainant.
- The name and personal details of the complainant should not be disclosed while sharing the complaint database with other departments.
- To address any complaint against CFMC, please complain direct to CD.

4.3 Gender, Gender Based Violence & PSEA (Protection from Sexual Abuse and Exploitation)

All staff working on the CFMC should receive specific training on how to deal with Sexual Abuse & Exploitation or other Gender/GBV related incidents. The investigators need to be more careful and sensitive to work with any GBV survivors. GBV guiding principles (Safety, Confidentiality, Respect and Non-discrimination) and referral for essential services (Health, Psychosocial, Legal/Justice and Safety-Security) of GBV survivors are to be remembered to deal with any GBV or SEA related cases.
For more information on core principles related to PSEA, please refer to the following links:

- https://interagencystandingcommittee.org/system/files/iasc_six_core_principles_rela
ting_to_sexual_exploitation_and_abuse_sept_2019.pdf

Refer to the following link for information on the IASC Best Practice Guide for Inter-Agency Community-Based Complaint Mechanisms:

https://interagencystandingcommittee.org/system/files/best_practice_guide_inter_agency_c
ommunity_based_complaint_mechanisms_1.pdf

Note that GBV survivors face some challenges when it comes to reporting sexual violence. Those challenges can be:

- Reporting systems which are not adapted to the different needs of men, women, children, people with disabilities particularly those who are visually impaired, etc. (e.g. suggestion boxes only available in crowded places like water points)
- Only written ways of reporting are available;
- Legal social status of group they belong to

Because of that, the CFM need to be adapted to each context after conducting a context analysis so that men, boys, women, girls, people living with disabilities, and members of the LGTBQI community in these contexts can share feedback and complain in cases of abuse.

Since investigations on GBV/SEA cases might cause threat to survivors and their families or even to investigators, a separate SOP needs to be developed for these cases in line with the ACF SEA policy.

Furthermore, a distinction should be made when recording complaints as to whether there is a sexist or sexual component to any violation of the code of conduct.

In case of assistance needed for the survivor, please use the GBV pocket guide (https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/docum
ents/files/gbv_pocket_guide.pdf) or Bangladesh GBV referral guidance to ensure that all relevant support and assistance have been provided to the person.
## 5 ANNEXES

### 5.1 Annex: Complaint Channels

<table>
<thead>
<tr>
<th>Method to Raise Complaint</th>
<th>Details</th>
</tr>
</thead>
</table>
| Mobile No.:               | • Sunday to Thursday from 9.00 AM to 4.00 PM  
• Mobile Phone will remain switched off in the weekend and any government holiday.  
• Process will start within 24 hours of the reception of the complaint.  
• To facilitate the process, CFMC will reply to missed calls.  
• SMS is also accepted and registered properly. |
| Complaint box:            | • Available 24/7, opened once in a week (Sunday).  
• Boxes will be installed in an easily accessible places in all offices, as well as other premises (e.g. EMoP, Reg. Camp office, Action Against Hunger-PNGO collaborated office)  
• In Dhaka office Manager CFM will open the box.  
• Cox's Bazar: Respective DFC will open the box in presence of a DPM/PM of the program. They will hand over the complaints to Manager, Audit Risk & Compliance (ARC). The Manager, ARC will send those complaints directly to CFMC Manager in Dhaka.  
• Other base: Person equivalent to the DFC will open the boxes in presence of a DPM/PM of the program. In absence of any Manager (ARC), the person will send the complaints directly to CFM Manager.  
• Management & Confidentiality:  
  o In all cases, only the CFM Manager can open the complaint envelopes.  
  o Anyone from the base is not allowed to scan or copy those complaints in no circumstances to ensure the confidentiality of the complaint, complainant, and alleged/indict person. |
| Air-mail / Postal / Courier: | • Address: XXXX |
| Email:                    | • Address to: XXXX |
5.2 Annex: Guidelines to How to Manage Complaints

A. Complaint received in person (verbal complaint).
   It may be that the complainant may share his/her complaint with any other person apart from the CFMC members, such as with his/her supervisor/ line manager/ colleagues/ peers/ FC/ PM/ DPM/ SPO/ PO/ etc. In such scenario the complaint receiver should notice the following points:
   • Do not create false expectations.
   • Do not make any promises.
   • Do not be rude.
   • Do not discourage.
   • Do not entertain complaints on issues which are not related to Action Against Hunger.
   • Do not argue.
   • Do not ask for any story apart from the facts/information linked to the complaint.
   • Advise to approach through CFMC

Note: The complainant should ensure the person whom s/he is reporting to is not the person they are making a complaint against.

B. Communication Means: information related to the complaint mechanism procedure will be shared with all Action Against Hunger staffs and beneficiaries in a routine manner. Additionally the mobile contact number and email address for complaints will be displayed in the following places/media:
   ✓ Project billboards
   ✓ Office notice board
   ✓ Vendors/suppliers contracts
   ✓ Website of District NGO Portal (GoB DC office).
   ✓ Project proposal/concepts note to Donors.
   ✓ Partnership agreement and contract.
   ✓ Project inception events, courtyard meetings - FGDs with beneficiaries.

Note: The Complaint Box will be placed in Action Against Hunger offices/workspaces.

2. Access Confidentiality:
   a) mobile and laptop will remain with the Manager Complaint & Feedback Management.
   b) Password of mobile, laptop and email are known to the Manager CFM.

3. Types of Complaints
   Different complaints can be categorized as follows:
   a) General Complaint
   b) Serious Complaint
   c) Threat Call/Obnoxious Calls

4. Complaints reception and management Procedure:
   • Verify if the complaint is about Action Against Hunger’s interventions. If the complaint is not linked to Action Against Hunger, then complaint receiver must inform this to the complainant.
   • Record the problem (according to the complaint record form) and categorize them.
### General

<table>
<thead>
<tr>
<th>Category</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program issues:</td>
<td>• Change in timings of food/NFIs distribution or quality,</td>
</tr>
<tr>
<td></td>
<td>• Change in location of child friendly space,</td>
</tr>
<tr>
<td></td>
<td>• Discrimination in selection of beneficiaries (race, sex, gender, creed or religion)</td>
</tr>
<tr>
<td>Safety &amp; Security issues:</td>
<td>• Mismanagement/ lack of transparency in procurement</td>
</tr>
<tr>
<td></td>
<td>• Negligence or mismanagement or Theft,</td>
</tr>
<tr>
<td></td>
<td>• Misuse of assets (office equipment, files /vehicles),</td>
</tr>
<tr>
<td>Management Issues:</td>
<td>• Breach of confidentiality,</td>
</tr>
<tr>
<td></td>
<td>• Conflict of interest,</td>
</tr>
<tr>
<td></td>
<td>• Violations of principles and terms of any Agreement between Action Against Hunger and that party.</td>
</tr>
</tbody>
</table>

### Serious

<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Fraud (or entitlement fraud)</td>
</tr>
<tr>
<td>• Financial Corruption, Misuse of Money</td>
</tr>
<tr>
<td>• Derogatory/Immoral behavior with beneficiaries involving verbal/physical abuse</td>
</tr>
<tr>
<td>• Harassment of beneficiary/ Or any act that might harm Action Against Hunger's Reputation</td>
</tr>
<tr>
<td>• Assault or threats</td>
</tr>
<tr>
<td>• Non-compliance with local laws</td>
</tr>
<tr>
<td>• Sexual/GBV or moral exploitation / abuse</td>
</tr>
<tr>
<td>• Misrepresentation or false certification on claims or benefits</td>
</tr>
<tr>
<td>• Risk of life to staff or others</td>
</tr>
<tr>
<td>• Abuse Power or privileges and immunities</td>
</tr>
<tr>
<td>• Act discrediting the Action Against Hunger, or that could affect severely on Action Against Hunger’s reputation.</td>
</tr>
</tbody>
</table>

### Threats

If the Complainant receives any call /statement by any means from anyone, who attempts to threat person/organization or try to influence on any program interventions through unfair means.

- The focal person will take necessary actions/initiatives to investigate the matter for resolution.
  - Discussion with the CFMC members
  - Develop the TOR
  - Conduct Investigation if necessary
  - Review the findings of the actions taken
  - Define the resolution
- Regardless of the subject and nature of the complaint the investigation procedure and report will remain under the custody of CFMC members only.
- The findings will be shared with concerned officials/Authority as per necessary.
- Otherwise, the entire process will remain confidential.
- Implement the resolution
- Record and share learnings
- Close the complaint.

### 5. Closing Complaints

The resolution of any complaint should be reached within 20 days. This can only be extended if there is clear justification which has been approved by the CD.

- In unavoidable circumstances if the decision has not been reached within the above-mentioned days, then the complainant needs to be informed on the process.

---

1 Description: this is not an exclusive list. Examples can be added over time.
• If the resolution of the complaint is not achieved within the above-mentioned period, then the CFMC may extend the period up to 30 workings days upon written notification and permission to CD/head of mission.

6. Confidentiality and Protection

In a bid to respect the law on the protection of computerized personal data, the incident reports should not use the names of individuals involved in an incident but only their staff ID#. These recommendations are based on the French regulations aiming at the protection of personal, confidential and sensitive data and the supervision of their collection.

• No identification of individuals in Incident report Names and first names of the persons involved in an incident must not be informed (victims, authors, witnesses...).
• The status (international, national, delocalized) and the gender can be specified.
• All complaints must be dealt with in confidence.
• Complaints records should be treated as confidential to safeguard sensitive information, upholding the principle of confidentiality.
• The complainant should be assured of not disclosing his/her information (Identity will remain anonymous) to any other person not involved in the feedback process.
• If the complainant is not willing to provide further information or if the issues can’t be moved forward without the complainant revealing themselves, the case can be closed with proper notice sent to the complainant.
• The name and personal details of the complainant should not be disclosed while sharing the complaint database with other departments.
• To address any complaint against CFMC, please complain direct to CD.

7. What not to DO:

• Do not communicate or create false expectations.
• Do not make any promises.
• Do not behave rudely with the complainant.
• Do not ask people not to call again.
• Do not entertain complaints on issues, which are not related to our programs.
• Do not turn off your phone or move your phone to any inaccessible location ensuring that the hotline is open from 9.00 am to 4.00 pm.
• Do not argue in such complaints and politely refuse to entertain such responses.
• Do not follow this mechanism for reporting emergency situations/events & accidents.
# 5.3 ANNEX: COMPLAINT RECORD FORM

**COMPLAINT RECORD FORM**

Complaint & Feedback Management Committee (CFMC),
Action Against Hunger / Action Contre la Faim, Bangladesh Mission

1. Serial No: COMP  
2. Time of call/complaint:  
3. Date: day/month/year

<table>
<thead>
<tr>
<th>4. Name</th>
<th>□ Anonymous</th>
</tr>
</thead>
<tbody>
<tr>
<td>5. Location:</td>
<td></td>
</tr>
<tr>
<td>(a) District:</td>
<td>(b) Upazila:</td>
</tr>
<tr>
<td>(c) Union:</td>
<td>(d) Village:</td>
</tr>
<tr>
<td>6. Mobile Number</td>
<td></td>
</tr>
<tr>
<td>7. Gender:</td>
<td></td>
</tr>
<tr>
<td>□ Female</td>
<td>□ Male</td>
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</tbody>
</table>

| 8. Complainant |
| □ Beneficiary | □ Suppliers | □ Volunteers | □ ACTION AGAINST HUNGER Staff | □ PNGO staff | □ Others: |

| 9. Nature |
| □ General Complaint | □ Serious Complaint | □ Threat Call | □ Other |

| 10. Department |
| □ Management | □ Finance | □ HR | □ Logistics | □ Program: |
| ... |

| 11. Complained Before? | (Whom/When): |
|  |

| 12. Details Complaint: |

<table>
<thead>
<tr>
<th>Questions hints:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) What is the complaint?</td>
</tr>
<tr>
<td>b) Whom against you are complaining?</td>
</tr>
<tr>
<td>c) What are the reasons of complaining?</td>
</tr>
<tr>
<td>d) When you observed that?</td>
</tr>
<tr>
<td>e) How you came to know the fact?</td>
</tr>
<tr>
<td>f) What is his expectation?</td>
</tr>
<tr>
<td>g) Anything else ..(extra notes):</td>
</tr>
</tbody>
</table>

CFMC USE ONLY

<table>
<thead>
<tr>
<th>13. Action Taken by ACTION AGAINST HUNGER:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Inform the CD/Equivalent</td>
</tr>
<tr>
<td>b) Discussion of the CM Committee (CFMC+CD+FC/concerned HoD according to the nature of the complaint)</td>
</tr>
<tr>
<td>c) Action points: meeting / Investigation: details + report / referral for services/ anything ...</td>
</tr>
<tr>
<td>d) Review the findings of the actions taken</td>
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<tr>
<td>e) Defining the Resolution</td>
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<tr>
<td>f) Implement the resolution</td>
</tr>
<tr>
<td>g) Reply back to the complainant.</td>
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<tr>
<td>h) Record and share learnings</td>
</tr>
<tr>
<td>i) Close the complaint.</td>
</tr>
</tbody>
</table>

| Status |
| □ Resolved | □ Pending | □ Discarded |

<table>
<thead>
<tr>
<th>14. Compiled by:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Designation:</td>
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<td>Date:</td>
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<tr>
<th>15. Reviewed by:</th>
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<tbody>
<tr>
<td>Signature:</td>
</tr>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Designation:</td>
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<tr>
<td>Date:</td>
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</tbody>
</table>
## 5.4 Annex: CFSM Database

<table>
<thead>
<tr>
<th>BC. Sn.</th>
<th>Received (day/month/year)</th>
<th>Gender</th>
<th>Channel</th>
<th>Category</th>
<th>Nature of Communication</th>
<th>Date Resolved: (day/month/year)</th>
<th>Result</th>
<th>Resolve Time</th>
<th>Comments</th>
</tr>
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<tr>
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</table>
5.5 ANNEX: FREQUENTLY ASKED QUESTIONS

   a) HR Policy/manual related to Complaint response and management will remain applicable only for Action Against Hunger staffs.
   b) This guideline will be applicable for both Action Against Hunger staffs and stakeholders (beneficiaries, suppliers, partners, etc.) compliant.
   c) Action Against Hunger staffs can complain either to HR department or to CFMC. For example, if a person finds him/herself in a position where complaining through his/her line manager would be a risk/security-safety threat – then s/he may complain to CFMC to remain anonymous or bypass the line management.
   d) In general, the complainant may complain either to HR Department or to CFMC; it will remain his/her discretion.
   e) If CFMC receives any complaints linked to HR Management, then that will be shared with HR department, considering the complexity and coherence of the complaint.
   f) The new recruits will be briefed on both HR policy and CFMC guidelines regarding complaint management.

2. Relations with Donors Complaint Guidelines: it will be settled upon discussion with the donor.

3. What is the Punishment Procedure?
   a) If the alleged person proved guilty, then the punishment procedure mentioned in the HR policy will be followed.
   b) Considering the complexity of the situation and findings of the investigation/ investigating committee - CFMC may recommend possible punishment.
   c) For criminal offence, organization may launch official report to the Law enforcement agency, if the management failed to reach to plausible solution.

4. How to communicate during weekend?
   a) Complaints sent during weekend and government holidays will be answered, during the first working day after the break.
   b) Emergency incidents/situations are not the subject to be addressed to CFMC. In that case the proper communication channel of the office/base will be followed (security Focal/Base Focal/Mission focal).

5. Is it possible to remain ANONYMOUS?
   a) If the complainant wants to remain anonymous, the identity will remain confidential.
   b) CFMC will request for a contact id (mobile number /email id or Postal address) to communication and feedback to the complainant.

6. How to minimize the risks of misusing of this mechanism?
   a) If the complaint proved false, then the complainant will be penalized according to the Punishment policy mentioned in the HR policy.
   b) If the complaint proved true, the action will be taken against the offender.

7. Is CFMC enough gender sensitive?
   a) The Secretary of the committee is a female person – and aware about gender sensitive issues.
   b) A member of the committee is also female and similarly aware/expertise in gender sensitive issues

8. How to forward complaints to Head of Base / Head of departments.
   a) The complaint will be forwarded to the concerned Field Coordinator or Head of department considering the complexity and coherence of the complaint
   b) Apparently the CFMC is not obliged to share Base/department related complaints with the FC/Head of Dept.

9. Complaint against CFMC: for any complaint against CFMC, complain directly to the Country Director.
5.6 ANNEX: Terms of Reference of an Investigation (template)

Terms of Reference for (title of the complaint)

Date: ---/---/---

1. Introduction:

These are the terms of reference to investigate the complaint lodged by Position & Organization against Position & Organization to Position & Organization, on Date. According to the complaint (Brief description). In response, Position & Organization has shared the matter with Position & Organization of, who has forwarded the complaint to CFMC on Date to investigate the matter in detail. The TOR is developed based on the primary information collected by the CFMC.

2. Background:

3. Purpose of the investigation: To establish the full facts review and verify: Interact/interview with the complainant and other concerned / Look for / Verify evidence / what happened.

4. Scope of the investigation:

The scope of the investigation should examine and interact with the complainant, and any other person, if deemed necessary for appropriate testimony. The investigation team may seek help from translator to ensure nothing is lost in translation. The timeframe of this review may cover the period from Dates to Dates.

The investigation will be undertaken by following staff:
- Position & Organization

The investigation findings will be shared and submitted only to CFMC for analysis and recommendation. The report will be published to concerned stakeholders only.

5. Confidentiality:

Investigation committee must maintain full confidentiality of all information received, collected and all facts identifies. All communication on this matter should be through CFMC alone.

6. Reporting line-up: Investigation committee will be reportable to the CFMC for the specific assignment.

7. Briefing/Communication:

- CFMC will brief Investigation team about their responsibility
- During the process Investigation team can communicate with CFMC for any advice
- Before circulation of report Investigation team will sit with CFMC for a wrap-up meeting.

8. Close of business:

The investigation team will submit their report along with all supporting documents to the CFMC within 10 working days from the date of delegation.
5.7 ANNEX: Investigation Methodology

A. Incident:
B. Purpose: Copy from TOR
C. Methodology:

1. Collection of information
      i. Reports, guidelines, memo, SOPs/directives, agreements.
      ii. Provided by CFMC and collected by the investigation team.
   b. Collection of information through Interview & interaction with stakeholders:
      i. Beneficiaries (Sample basis) (victim)
      ii. Alleged perpetrators
      iii. responsible officials of Partner (if applicable)
      iv. responsible officials of the organization (program Officials / Management / support dept. officials)
      v. Responsible officials of Capital office in Dhaka.
2. Cross matching between the information received through Interview and Document review.
3. Identify the Causes (Factor /actor responsible for the incident):
   a. Human Error (Negligence or ignorance of individual)
   b. Process Error (communication not done / booth not time installed / affiliated parties’ coordination not harmonized etc.)
   c. Material Error (system inadequacies: communication with the communities was not done due to the absence of the comm-tool)
4. Presentation of the Fact & initial recommendation to CFMC
5. Role of CFMC:
   a. Coordinate the investigation process in base level.
   b. Conclude the final recommendation of the investigation.
6. Attention:
   - "Right" and "wrong" answers may not be clear.
   - Each investigator may have completely different opinion, no need to strive for consensus, present individual opinion in separate section of the report.
   - Think about how you are looking at or investigating a question. Is there a better way? Can you look at the same question from another point of view? This may help you find what you are looking for.
   - Disagreement in senior management regarding the question: Who is responsible?
5.8 ANNEX: INVESTIGATION REPORT

CFMC Report

1. Background
2. Process of Investigation:
   2.1. Interview with the complainant.
   2.2. Interview with alleged perpetrator (suspected person).
   2.3. Interview with the individual related to the complaint (observer, colleagues).
   2.4. Collection of Evidence (any format) and statement from the interviewees.
   2.5. Analysis of the interview and evidence - considering the objective of investigation.
3. Key areas of Investigation:
   3.1. Points 1
   3.2. Points 2
4. Investigation team:
5. Report Preparation: This report is jointly prepared by the investigation team.
6. List of the interviewees:
7. Highlights of the Report:
8. Findings of the Investigation:
   • Remarks:
   • Evidence:
   • Notes of Evidences:
9. Recommendation:
10. I agree with the above report: name & signature of the investigation team members

5.9 ANNEX: Beneficiary selection related complaints management:

A Complaint Response Mechanism will be set up with a complaint box. The phone number will be also clearly indicated. This will allow people with limited access to email or phone to write their complaint. Pen and form will be available. Action Against Hunger and partner NGO Staff will be around to provide any support needed. Each complaint will be surveyed. For the coordination of the Beneficiary selection complaint Mechanism the following steps will be ensured:

Step 1: Community consultations & primary list
Step 2: Door to door survey
Step 3: Data entry and database development
Step 4: Draft list established
Step 5: Draft list display and complaint mechanism
Step 6: Re-survey & Investigation
Step 7: Develop final beneficiary list
Step 8: Beneficiary list validation by UP & UNO