



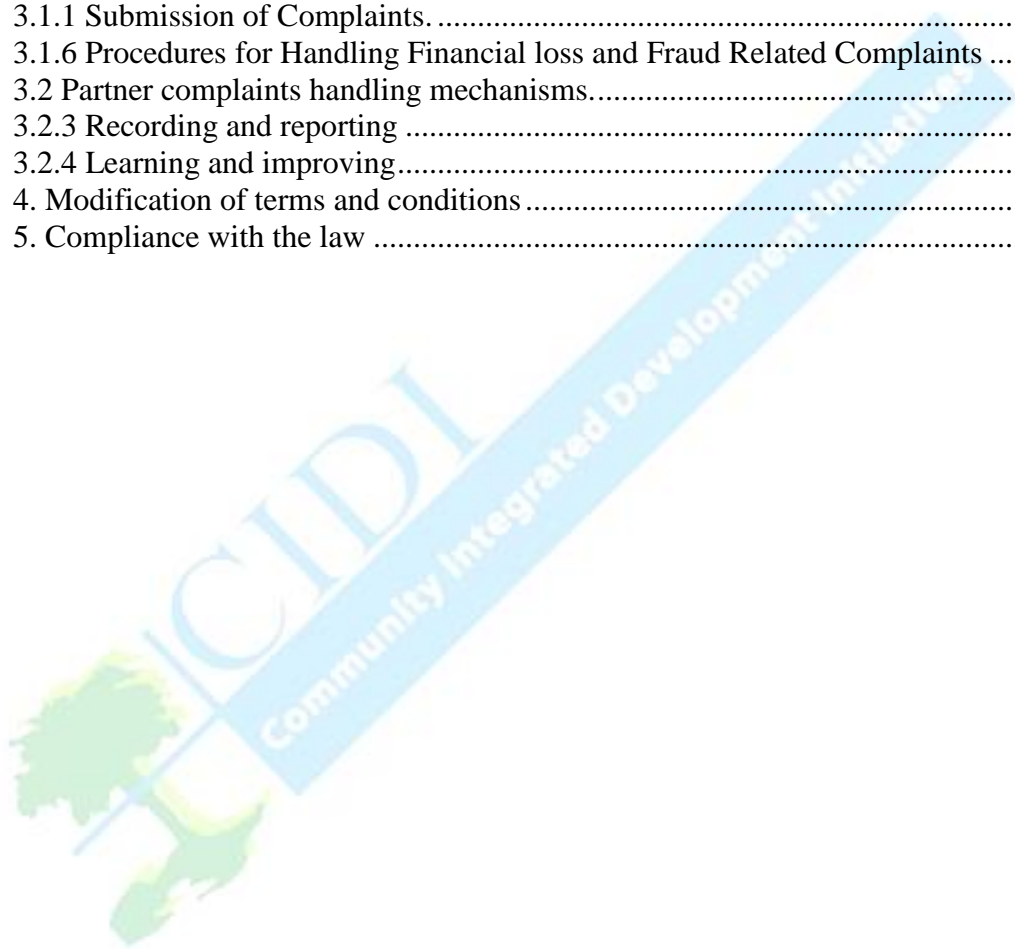
CIDI COMPLAINTS HANDLING POLICY (WHISTLE BLOWERS)

July 2018

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Acknowledgement:

In coming up with CIDI Complaint Handling Policy, a number of consultations were made. CIDI wishes to especially acknowledge the contribution from her Partner Caritas Denmark that provided guidance and some material that have been of much relevance in coming up with the CIDI Complaint Handling Policy.

ABBREVIATIONS

ED	-Executive Director
DED	- Deputy Executive Director
PC	- Programmes Coordinator
HRM & ADMIN	-Human Resource and Administration Manager
HOF	- Head of Finance
CCHC	-CIDI Complaints Handling Committee
SPM	- Senior Programme Managers
SMT	- Senior Management Team
CHP	- Complaints Handling Policy
CHM	- Complaints handling mechanism
GSM	- General staff meetings

SECTION ONE

CIDI COMPLAINTS HANDLING POLICY

1 Introduction

A complaint is a consequence of customer dissatisfaction, it has long been considered an important form of feedback. On the other hand Customer Complaints Management is becoming a critical key success factor in today's working environment.

Complaint Management System is a system that can survey Staff /customer / beneficiary /stakeholder feedback about any organizations performance. Best-practice organizations consider complaints as opportunities for improvement. CIDI as an organization understands the link between complaint resolution and customer loyalty and work hard to act immediately on problems that can be easily resolved. In addition, CIDI needs a user feedback to find out the challenges before or after implementing a project.

CIDI realizes that in order to effectively and efficiently maintain good service delivery, all employees, stakeholders, beneficiaries and partners must be in the know of how issues relating to their work challenges are managed. It's part of CIDI's culture to have issues settled amicably for smooth running of work thus society's progress to development without any feared negative consequences by the beneficiaries.

1.2 Purpose

1. The purpose of Community Integrated Development Initiatives (CIDI)'s Complaints handling Policy (CHP) is to ensure that complaints from beneficiaries are heard, recorded and resolved in an effective and professional manner. It is intended to ensure that all beneficiaries, staff and other key stakeholders are handled fairly, consistently and wherever possible, complaints resolved to the complainant's satisfaction. CIDI's responsibility will be to deal reasonably, appropriately and sensitively with the complaint and take action appropriately.

Therefore CIDI's CHP is intended to;

1. Show staff, beneficiaries and other stake holders the steps that one takes when dealing with complaints.

2. Ensure complaints are dealt with uniformly each time they occur in accordance with the CIDI's organizational principles.

It is our policy to promote the highest standard of service to the communities we serve. We endeavor to ensure that all complaints are, wherever possible, resolved in a satisfactory and timely manner. Hence this policy has been developed to provide clear and consistent guidelines and procedures for handling complaints in a manner that promotes transparent dialogue, clear communication and encourages community feedback.

This policy demonstrates:

a. Commitment

We are committed to efficient and fair resolution of complaints by beneficiaries and stakeholders. We acknowledge their right to complain and actively solicit feedback from them.

b. Procedural Fairness

Fair complaints handling procedures are integrated into our activities and beneficiaries and stakeholders know the processes. Confidentiality is respected at all times and decisions are communicated, as well as the rationale for those decisions. Complaints are to be managed in an open and transparent manner that is open for review whereby:

- Decision makers act fairly and provide reasons for decisions .The person affected is given a fair hearing and opportunity to review or appeal.
- All relevant information and arguments are considered.

c. Resources

Adequate resources in terms of personnel are committed for complaints handling with sufficient levels of delegated authority. Also there is provision for the complaints policy to be reviewed regularly.

d. Visibility and Usability

Our complaints handling processes are available to beneficiaries and stakeholders in their local language and cater to the needs of women, children and people with disabilities.

e. Responsiveness

Complaints shall be dealt with as quickly as possible and the complainants shall be treated courteously.

f. Accountability

Our processes will take account of community members' preferred methods for making a complaint, and will be reviewed with consideration to their level of satisfaction with the system. All reported cases will be recorded and fully accounted for.

SECTION TWO

2.1 Scope of complaints handling policy

A complaint is an expression of dissatisfaction about the standard or quality of our work, or is related to the actions or lack of actions taken by CIDI or partner staff that directly or indirectly causes distress to the affected party.

2.1.1 Who can make a complaint under this policy?

CIDI Complaints Handling Policy encourages two levels of complaints handling mechanism: (1) complaints filed directly with CIDI and (2) complaints filed with donors.

1 Complaints filed directly to CIDI by:

- Staff of CIDI
- Beneficiaries /Individuals from operational areas, Networks, consultants, auditors, contractors, visitors, government representatives, NGOs and other stakeholders

2. Complaints Filed to donors by:

- staff of CIDI
- Partners or Stake holders
- Donors to Donors

2.1.2 Types of complaints

Complaints may vary in severity, complexity and whether any allegations are admitted or denied, so CIDI gives staff or stakeholders the option of an informal or formal procedure.

Formal Procedures are to substantiate a complaint with evidence or at least bringing those involved together to try to reach a satisfactory outcome for all. **Informal Procedures** are for quick problem solving rather than investigating and substantiating claims. **CIDI categorizes complaints in three major ways: Operational/ implementation complaints, Financial loss and fraud related complaints and Human Resource complaints.**

Operational complaints relates to the implementation of CIDI programmes and activities in all the thematic areas or partner organization with whom CIDI relates in terms of work. For instance a farmer complaining about seeds delivered by CIDI that did not germinate.

Financial Loss and Fraud related complaints can involve any type of irregularity such as corruption, misuse of project resources, bribery, nepotism and embezzlement etc.

Human Resource complaints includes sensitive complaints such as sexual exploitation and other abuse of people or power, or other gross misconduct or malpractice involving CIDI staff or partner staff. This includes both staff violation of protection policies, organizational code of conduct and/or ethical codes, as well as threats and assaults made against CIDI or partners.

Due to their different nature, these three types of complaints are handled in different ways taking specific requirements and any risks to parties involved into consideration. Any complaints that indicate a possible criminal offence has been committed should be referred, either by CIDI or its partner, to the statutory authorities responsible for investigating such matters.

SECTION THREE

3. Complaints handling procedures

3.1 CIDI complaints handling mechanism.

CIDI Complaints Handling Policy is described in section one and two of this document. Here complaints handling procedures and guidelines are explained as well as improvement in complaints handling mechanisms described.

3.1.1 Submission of Complaints.

A complainant/ whistle blower can file a complaint to CIDI through email (cidi@cidiuganda.org), website (www.cidiuganda.org), letter to CIDI, Suggestion box ,verbally, meetings or through staff or authorized representatives.

It is the ambition of CIDI to continuously explore new options for improving complaints pathways in order to ease the burden of filing a complaint for any potential complainant. Therefore CIDI will be always interested in receiving suggestions for new complaints pathways and will bring forward such request regularly when appropriate occasions arise.

The submission of complaints is however only a small part of the complaints handling mechanism design. The larger part is the complaints handling procedure after submission. Hence, to ensure a participatory design the potential users of the mechanism should have the possibility to provide inputs on the policy and procedures. For this reason, all CIDI partner organizations and other selected stakeholders representing the main potential users are invited to feed into this policy.

3.1.2 Updates of CHM handling.

This policy is considered a “living” document and will be updated continuously as we learn and improve our complaints handling procedures. Whenever the document is revised it will be shared amongst all partners, highlighting whenever changes added.

CIDI will make an effort to share or orient her new beneficiaries/stakeholders/donors on her CHM and other documents on ethical code of conduct eg Anticorruption, Zero Tolerance etc.

The presumption is that with this information, the complainant would find it easy to ascribe a complaint. Also the complaints handling policy shall be made available on our website (www.cidiuganda.org).

3.1.3 Receiving and Classifying Complaints Procedures

When a complaint is received, whether through the website mechanism, by mail, or by verbal or written communication it is forwarded to the CIDI Complaints Handling Committee (CCHC). The CCHC comprises of five members appointed by **CIDI Board of Governors** and consists of the Executive Director (ED) because of Governance and administration issues, Deputy Executive Director (DED) for Gender issues, Programme Coordinator (PC) for program related issues, Human Resource and Administration Manager (HR & ADMIN) for HR issues, Head Of Finance (HOF) for finance related issues.

The Executive Director is the CCHC Chairman and the HR & ADMIN Manager acts as Secretary for the committee.

Complaints received through the website will be downloaded and a reply sent explaining the process of complaints handling and sharing information on when feedback can be expected. For complaints received through email, either to cidi@cidiuganda.org or to an individual member of staff, the reply will be given by the CCHC Secretary within 14 days. For complaints received verbally, this communication is delivered by the individual receiving the complaint. All CIDI staff will be able to explain the complaints handling process.

When receiving a complaint, the CCHC convenes as soon as possible to classify the complaint. In case of absence of a member, communication can be by email or phone. The members present can decide to prepare a proposal for handling of the case to the absent member for his or her approval.

In case of disqualification of a member of the complaints committee in relation to a specific complaint, the committee can decide: to process the complaint without participation of the disqualified member, to call upon a third person as ad hoc member, or to submit the complaint to the Board. In all cases of disqualification, the Board Chairman will be notified. The Board chair of CIDI will always process complaints concerning the Executive Director. Complaints against the Board of CIDI or individual Board Members will be processed by the Board Complaints Handling Committee. After receiving the complaints the following steps will be taken in processing it:

- a. The CCHC will classify the complaint by defining the type of complaint as Operational, Financial loss and Fraud related, or Human Resource and Administration, which will guide the processing of the complaint.
- b. Once a complaint is classified the next step will be for the CCHC to consider the need for the involvement of the staff responsible for where the complaint lies.
- c. CCHC will determine whether the complaint is relevant to CIDI and not suitable for referral as well as whether the complainant is known or anonymous.
- d. Subsequently, the CCHC develops a complaints handling action plan and appoints a task force for its implementation. When applicable, local authorities or other stake holders like the LCs will be consulted in the development of the action plan, and can be part of the task force to resolve community based complaints.
- e. All complaints received by CIDI will be given a case or reference number in order to ensure a more systematic recording and documentation. A case number will be reflected in the register.
- f. The task force reports verbally the outcome to the CCHC, who assesses whether the case can be closed or whether further action is needed. The action plan might consequently need revision during its implementation depending on the outcome of its related investigation, negotiation, mediation etc.
- g. The complaints committee will inform the complainant of the outcome not later than one month from reception, if this person is accessible. In case an outcome is not reached within one month, the complainant will instead receive an update from the CCHC. If needed, the CCHC can request further information or documentation from the complainant.

CIDI has regional offices and some complaints may be handled at these offices. In this case the CCHC will comprise of the Team Leader, M&E and Accountant. A similar procedure shall be followed as listed above. If the regional CCHC should have any resolved cases can be referred to the CCHC of head office. Similarly if the complainant is not satisfied at the region, they can appeal their complaints to CIDI head office.

CIDI encourages its beneficiaries, staff and other stakeholders to resolve issues that affect them through normal community structures and feedback systems set up by CIDI such as community advocacy structures, Food Management Committees, Health Promoters, Volunteer groups among others. The Complaints Handling Mechanism therefore is not a substitute for regular feedback mechanisms such as dialogue, review and other feedback meetings. Serious issues that are relevant and under the control of CIDI can be raised by writing a simple letter in English or any other local language and addressed to CCHC. Illiterate members of the community shall be encouraged to identify among the communities a person they trust to help them write where they may be unable to write. The letters shall be dropped at the CIDI office nearest to them. A complaints register shall be kept at the offices where all complaints and action taken shall be documented. All Complaints received by letter must be signed for by the officer receiving them. Complaints that have been received in writing must have the settlement written out and shall be signed for by the complaint as well as the Chairperson of the CCHC. Where the community structures have been availed Mobile Phones, complaints may also be raised through a call and documented in the complaints register indicating the date and nature of complaint.

3.1.4 Referral of Complaints Procedures

When CIDI receives a complaint that is related to the activities or staff of a programme or organization, the complaint will be referred directly to the concerned party or Head of department to mediate and manage the complaint, where possible. Where necessary, CIDI would support the complainant to seek justice or feedback on services as appropriate and where safe to do so. Any action taken by CIDI in relation to referral of a complaint will be recorded.

3.1.5 Procedures for Handling Anonymous Complaints (Whistle Blowers)

Anonymous complaints should be treated with due respect, consciousness and seriousness. It may be possible to investigate anonymous complaints if there is sufficient background information given and/or possible witnesses. However, in case of anonymous complaints, the CCHC shall make an assessment of the extent to which it is filed in good faith.

Anonymous complaints that appear as deliberate false accusations with the intent to harm the implicated individual or organization are rejected and the complainant is - if possible – informed accordingly, and hence provided the opportunity to appeal. In case of doubt as to the nature of the complaint, it will always be processed. The CCHC will consider if a complaint identified as malicious is indicating an obstacle to implementation and if any action is necessary to redeem such situation. Even if not processed, the complaint shall be given a case or reference number and put on record for future reference.

3.1.6 Procedures for Handling Financial loss and Fraud Related Complaints

With financial loss and fraud related complaints, a task force is appointed and it can be relevant to consider participation of staff responsible for the specific operation, if no suspicion exists against this or these individual employees. It will rarely be appropriate though to involve the implicated staff or partner sub grantee organization in the task force. Instead, there will be close consultation with CIDI compliance officer, external auditor and in some cases the CIDI Board.

Ministry of Finance, Economic Planning and Development (MoFEPD) requires full transparency in the handling of financial loss and fraud related complaints and regularly publishes the details. This information is provided to the public, case files can be kept accessible to all staff. However in handling finance/fraud allegations CIDI will act as discretely as possible while investigations are ongoing and make a point of emphasis that no one is considered guilty until proven so.

At the regular SMT and General Staff meetings (GSM), the Executive Director informs the staff of new financial loss and fraud related complaints and of progress on the ongoing cases. The same information is shared with the CIDI Auditor when doing the annual audit

of CIDI. Once the case is closed, the complainant will be informed of the outcome, if the person is known.

3.1.7 Procedures for handling Human Resource /sensitive cases e.g Sexual Harassment, Child Molestation.

These complaints will be handled in strict confidentiality in order to protect all parties involved. Therefore these case files will only be handled by the secretary to the CCHC though in some cases in consultation with the Board, If not consulted in the handling, the CCHC Chairman will immediately inform the Board of the reception of a sensitive complaint. Of the steps described in the action plan by the CCHC and the sub-subsequent outcome.

Reference will be made to National legislation that relate to this clause and each case will be considered individually and expert advice when appropriate. CIDI will seek to follow best practice as it has been documented and agreed for each of the partners, beneficiaries etc. in all the CIDI areas of operation. For complaints involving children, the investigation will be undertaken in accordance with the Ugandan policy on Child Protection.

CIDI has zero-tolerance in cases of any sexual exploitation or abuse or other abuse of people, whether children or adults. In such cases, validation of a complaint concerning a CIDI staff will lead to immediate termination of employment and legal actions will be considered. If the offending person is an employee of a Stakeholders or communities we work with, which is not supporting termination of the employment, the continuation of the partnership shall be evaluated. In cases of abuse of power, or other gross misconduct or malpractice, termination of the employment must be considered. If the employment is not terminated, any disciplinary action will be treated with confidentiality in order to protect the staff in question. In that situation, the complainant would merely be informed whether or not the complaint was substantiated and whether disciplinary action was taken, but not of the details of the disciplinary action.

3.1.8 Resolution and Right to Appeal

It is in the interests of both the complainant and CIDI to ensure that any complaint is resolved in a satisfactory manner. Should the complainant not feel satisfied with the outcome despite having had the opportunity to request further clarification or feedback, they can submit a formal appeal directly to CIDI Board Chairman/Executive Director. This can be done in writing, by letter or e-mail, to the following addresses:

Org: CIDI (Community integrated Development Initiatives)
Attn. Executive Director
Plot 2809, Tank Hill Road
Muyenga
Mark: Confidential
cidi@cidiuganda.org

The Executive Director will then assess if the CCHC has abided to the policy and procedures outlined in this document, and if the complaint has been treated fairly. Furthermore, the Executive Director has the mandate to assess the level of insight into the complaint handling circumstances that a complainant wishing to appeal can be granted.

3.1.9 Sanctions for False Accusations

False accusations against an individual or organization can have severe implications for those involved. The accused might have been humiliated, have had their reputation tarnished, a project might have been suspended, activities delayed etc. Hence, in case of deliberate false accusations, sanctioning of the complainant would be the fair consequence.

In practice, this might be difficult to implement depending on the specific situation. The accused can consider resorting to court, in which case CIDI will NOT consider financial support, depending on the specific case in question.

If the complainant is a staff member of CIDI, the management will decide an appropriate reprimand towards the complainant and assess the need for compensation to the falsely accused individual or organization.

Nevertheless, most likely a deliberate false accusation will be made by an anonymous complainant, fearing repercussions. In such cases, sanctioning is not possible. This fact is taken into consideration when processing anonymous complaints.

3.2 Partner complaints handling mechanisms.

The role of CIDI is to accompany and support the donors or partners to implement high quality interventions in line with national standards and general good practice in order for them to deliver the best possible service to the people in need. This entails ensuring that partners have appropriate policies, systems and procedures in place to enable such intervention, bringing their attention to weaknesses and guiding them towards improvements.

3.2.1 Awareness and Acknowledgement

CIDI SMT is to ensure that staff, stakeholders and partner organizations have a culture in which complaints are taken seriously, mapping the systems in place is critical because it gives a guide.

Raising awareness with Stake holders or partner organization to fully understand the need to develop or improve their complaints handling mechanism and acknowledge their obligation to manage complaints in a timely, fair and appropriate manner.

3.2.2 Mentoring and Monitoring

All CIDI staffs are expected to be knowing the principles of CIDI Complaints Handling Policy described in this document.

It is the responsibility of CCHC to guide the staff towards this achievement. Foras' like staff meetings, emails and all other communication avenues as guided by the communication policy for CIDI will be used to make sure staff get this information and are guided well.

During monitoring visits, the SPMs will monitor the application of procedures. This includes ensuring that all procedures are adhered to.

During CIDI's Annual Review and planning workshop held in December a review will be made by all departments to check the extent to which complaints were handled or managed in line with the procedures described in the complaints handling policy.

3.2.3 Recording and reporting

The Secretary of CCHC will ensure that a section in the CIDI quarterly progress reports has a provision for reporting on complaints handled by CIDI or her partner.

In December each year before the Annual Review and Planning exercise, CCHC will compile a list of all complaints received and reported from stakeholders, staff during the previous year. The CCHC will meet and go through this list for their information. Subsequently, the CCHC Secretary will consolidate this compilation with the complaints submitted during the year directly to CIDI and assess what can and should be discussed with all staff

This will serve as information on CCHC for all interested stakeholders and as a summary record for CIDI's own use and reflection. The level of information disclosed will depend upon the nature of the individual complaints and protection of the implicated parties.

3.2.4 Learning and improving

The Annual Complaints Record Report will be utilized internally as the basis for discussion during monthly staff meetings every month. The staff will go through the complaints one by one and reflect upon what we have learned from this particular complaint and how we can improve our work based on this lesson.

Like mentioned earlier, learning from complaints received by the CCHC might also have identified weaknesses and inspired change during the year. Nevertheless, the staff meeting learning discussion provides systematic means for making sure that all learning is extracted from the complaints and all possible improvements are implemented.

It is CIDI's aspiration to learn from our complaints handling mechanism that, each complaint we receive we learn to constantly improve our policy and procedures to live up to our responsibility to be answerable and protect all involved work staff or stakeholders. Also to be able to provide our partners the best possible service and care to all beneficiaries and communities we serve.

4. Modification of terms and conditions

CIDI reserves the right to modify these conditions at any time. The staff or customer (s) will be notified of any such changes by circular letter and other appropriate means including notice displayed at the CIDI's Head Office and all Field Offices

5. Compliance with the law

The terms and conditions are subject to applicable provisions in Uganda, regulating NGOs as maybe amended from time to time. In the event of any inconsistency between such statutory provisions and these terms and conditions the Statutory provisions shall prevail over and override these terms and conditions in the absence of any exempting provision of law and these terms and conditions shall be deemed to be amended as necessary so as to be in conformity with such legislation.

This **CIDI COMPLAINTS MANAGEMENT AND HANDLING POLICY** was reviewed and approved by Community Integrated Development Initiatives on-----
30/July/2018 And signed on its behalf by:

Anthony Chairperson

[Signature] Secretary

COMPLAINTS TEMPLATE FOR CIDI STAFF AND OTHERS

CIDI Complaints Template			
Name of the Organization			
Name of Employee/ customer			
Job Title			
Date of Complaint			
Explain the nature of your complaint, naming individuals involved, witness of the incident and provide proof you have about the complaint			
How has the incident affected your ability to work effectively			
Suggest actions that CIDI would take in order to effectively deal with your complaint			
Please any other comments that would be helpful in dealing with your complaint			
SIGNATURE		DATE	