

COMPLAINTS HANDLING POLICY

FEBRUARY 2021

SUBJECT: COMPLAINT HANDLING POLICY

1.0 OBJECTIVE: To provide a reliable mechanism for addressing employee, beneficiary Community and stakeholder complaints and feedback for effective program implementation and human resource management within INGH.

1.1 POLICY STATEMENT: The policy is to provide a transparent and fair mechanism by which complaints, grievances and feedback from employees, project beneficiary communities and stakeholders of INGH operations can be promptly responded to without intimidation and discrimination against the complainant.

2.0 DEFINITION OF TERMS

- **A complaint** is defined as a formal expression of dissatisfaction or discontent, and/or misconduct, about someone or something” Examples include, misbehavior by an organization’s staff member or partners, breaches of INGH’s Child Protection Code of Conduct and other policies such as the Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH), anti-fraud policies. Others include dissatisfaction with the standard or quality of service provided or the quality of program delivery.
- **A sensitive complaint** is typically a complaint about corruption, sexual exploitation, abuse or harassment, gross misconduct or malpractice.
- **A non-sensitive complaint** concerns the implementation of activities, decision (s) taken, or advocacy / policy position held by INGH or its assigns.
- **Feedback** is any positive or negative informal statement of opinion about someone or something – an opinion shared for information but not with the intention of lodging a formal complaint. A complaint requires a response whereas feedback does not require a formal response.

3.0 POLICY PRINCIPLES

- **Safety**

INGH is committed to ensuring the safety and protection of all complainants.

- **Confidentiality**

Sensitive complaints will be handled confidentially without any retaliation from INGH. Information will not be shared outside of the Complaint Handling Committee unless it is necessary.

- **Transparency**

INGH will ensure that all project communities, staff, volunteers, contractors, agents and partners will be clearly informed on how they can access the Complaint Handling Mechanism (CHM) and the necessary procedures to follow when they have complaints, grievances and feedbacks.

- **Accessibility**

INGH is committed to ensuring that the CHM is accessible to all its project communities, staff, volunteers, contractors, agents and partners.

- **Impartiality**

INGH is committed to justice. Decisions would be based on an objective criterion in line with the rules of natural justice and INGH's policies, practices, rules, regulations, and procedures.

- **Swiftness**

INGH will ensure investigations are conducted efficiently and comprehensively in a timely manner.

4.0 GUIDELINES:

- a) All new employees, project communities, interns, volunteers and consultants shall be orientated on the Complaint Handling Mechanism (CHM) and the processes by the People and Culture Manager (PCM) or Program Manager (PM) as the case may be.
- b) Complaints, grievances and feedback from employees, project beneficiary communities, interns, volunteers and stakeholders shall be made through the following media: phone calls, suggestion boxes to be placed at all project centers, emails, verbal reports, written correspondence and text messages.
- c) INGH shall make available in all project beneficiary communities, information on how complaints can be made, with contact details to facilitate the reporting of all complaints, grievances and feedbacks.
- d) All investigations and resolution of complaints/ grievances shall be recorded and documented for reference. They shall be treated as confidential records.

- e) The identity i.e., names, pictures, addresses and other details of complainants shall be protected throughout the investigation.
- f) Any complainant who is unsatisfied with the resolution of his/her complaint or grievance shall have a recourse to an appeal to a higher authority; e.g.; after the immediate supervisor appeal to the Head of Department/Program Manager, after Head of Department/Program Manager, appeal to Head of Programs (HOP) and after HOP appeal to Executive Director and after the Executive Director appeal to the Board Chair.
- g) Both PCM and HOP shall conduct a Monitoring & Evaluation exercise to check the effectiveness of the CHM annually and submit a report to management for study.
- h) Investigations by the committee shall be based on the principles of Impartiality, Swiftness, Dignity and Separation of investigation and disciplinary decision making.

5.0 PROCEDURES:

5.1 Aggrieved Employee/stakeholder/community member or beneficiary shall

- a. Inform immediate supervisor, field officer, management staff of his/her grievance/complaint.
- b. Request a meeting with his/her immediate supervisor/field officer/management staff.
- c. Present the grievance/complaint in writing or any other acceptable means, identifying the Article/Section of conditions of service, project specification or outcome allegedly violated by management or staff to the Head of Department if the grievance is not resolved by filling the Complaint Resolution Form.

5.2 Recipient of complaint/grievance

- a. The officer receiving the complaint can handle the matter immediately in case of non-sensitive cases and report to the HOP /PCM as the case may be.
- b. Sensitive cases shall be reported to HOP/PCM with acknowledgement of receipt given to the complainant, assuring him/her of fair investigation.
- c. PCM/HOP shall select a committee of 3 persons (including staff of People and Culture Unit & Senior Project Staff) to look into the matter and report within 3 working days. An extension of 1 week shall be considered in matters that relate to persons outside the organization.

5.3 Complaint/Grievance Committee

- a. A CHM committee shall be set up upon receipt of a complaint/ grievance or feedback from any complainant within the stakeholder community. This committee shall not comprise the employee or staff of his/her department if the complaint is about them.
- b. The Committee shall give fair hearing to all parties to the complaint and establish the point of error/fault/infraction/violation of INGH policy, procedure, mandate or project outcome as far as possible and advice applicable sanctions or remedy where necessary.
- c. The committee shall, in cases of fraud, financial malfeasance or misappropriation conduct a forensic investigation into the matter establishing the validity of the complaint. This shall be done under the principle of “a suspect being innocent until proven otherwise”.
- d. The committee shall submit a report on its findings to the ED or his assigns.

5.4 Executive Director

- a. ED receives committee report and expedites action on the recommendations.
- b. ED or his assign writes to the complainant on the outcomes of the investigations.

5.5 The Board

The Board Chair of International Needs Ghana shall be copied on all complaints. Upon Receipt, he/she shall designate a member of the Board to follow up on the complaint (s).

APPENDICES



GUIDANCE SHEET FOR COMPLAINT HANDLING

International Needs Ghana seeks to provide a reliable mechanism for addressing employee, beneficiary Community and stakeholder complaints and feedback for effective program implementation and human resource management within INGH.

INGH therefore encourages these stakeholders to provide any complaints and or suggestions about its programmes, commitments or staff conduct. INGH believes that it is the right of all its stakeholders to make complaints.

Complaints shall be communicated through the Program Manager. If it involves the Program Manager, the complaint shall be communicated to the Head of Programs or the Executive Director at the head Office in Accra. All complaints will receive a response within two weeks.

INGH is also open to receiving anonymous complaints. It must be noted however that, such complaints are difficult to investigate without direct contact with the complainant.

The Board Chair of International Needs Ghana shall be copied on all complaints. Upon receipt, he/she shall designate a member of the Board to follow up on the complaint (s).

Executive Director

INGH COMPLAINT HANDLING FORM

CONFIDENTIAL

This form should be completed by the person wishing to lodge a complaint or documented by a third party. All information must be held securely and confidentiality must be maintained at all times

A: General data

1. Name (if willing) _____
2. Sex : Male () Female () Age: _____
3. Address: _____
4. Tel: _____ Email: _____
5. Name of the person you wish to lodge a complaint against (if known):

6. Date of Incident _____ Time of incident _____
7. Place of Incident _____
8. Date of reporting _____ Time of reporting _____

B: State the nature and key issue of the Complaint

C: Brief description of the incident or concern (State what exactly happened, trying to follow the sequence of events from start to finish; If the incident location is not well known, describe the location based on your memory of it; Give a description of the 'subject of complaint' if you do not know her/his name.

D: Name of witnesses (if any): _____

Location of Witness (if known): _____

E: Kindly attach any other evidence

F: Name and Signature of Complainant: _____

Date: _____

G: Name and Signature of Third Party documenting the Complaint:

Date: _____

H: Case referred to: _____

Date referred: _____