

COMPLAINT MECHANISMS REFERENCE GUIDE FOR GOOD PRACTICE

Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

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Author: Transparency International

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INTRODUCTION

BACKGROUND

Effective complaint mechanisms are a key tool to identify and prevent corruption and other malpractice. By providing citizens with channels to report any incidence or suspicion of corruption or other malpractice, complaint mechanisms allow for the identification of problems which might otherwise not surface, and for subsequent corrective action to be taken. Therefore, credible and functioning complaint mechanisms constitute a key tool for public institutions, companies and not-for-profit organisations to manage corruption risk and potential reputational damage.

A properly functioning corruption complaint mechanism requires that citizens are able to make complaints in an easy and straight forward manner and that reported cases are handled efficiently and effectively. The mechanism also needs to provide an adequate and timely response to the issues raised, as otherwise grievances can fester. Moreover, it requires an open attitude, which recognises the important role that complaints from members of the public and affected businesses, organisations or communities play within society.

An effective complaint mechanism has the potential to strengthen the organisation's credibility and reputation. Eventually, it will lead to a win-win situation for both parties and strengthen trust of citizens and communities in the relevant institution, organisation or project.

SCOPE OF THE DOCUMENT

Complaint mechanisms can serve a range of purposes: They can offer channels to provide feedback on the quality of a service provided, alert of health or environmental risks and provide information about irregularities and corruption. Whether complaint mechanisms are limited to corruption complaints or offer citizens the opportunity to alert about other types of concerns as well will depend on the size of the organisation national regulations and other requirements.

The purpose of this document is to set out guiding principles and good practices for establishing and implementing complaint mechanisms which provide safe channels for citizens to alert a public or private institution about any corruption risks or incidences. It draws on Transparency International's experience in this field and makes reference to a wide range of relevant mechanisms and literature to illustrate the generic elements of effective complaint mechanisms.

It aims at being a reference for good practice in designing complaint mechanisms for governments, civil society organisations, businesses and any other institution.

KEY DEFINITIONS

Corruption

The abuse of entrusted power for private gain.

Corruption complaint

A report about a perceived or real incident of corruption or the risk thereof raised by an individual, group of individuals or community.

Complaint mechanism

A mechanism through which citizens are enabled to address complaints related to a particular institution or organisation and through which it is ensured these complaints are properly reviewed and responded to.

GUIDING PRINCIPLES

TRANSPARENCY, INTEGRITY AND ACCOUNTABILITY

Transparency, integrity and accountability are interconnected principles and constitute elements of any anti-corruption work, hence their importance for complaint mechanisms providing channels in order to report the misuse of entrusted power for private gain and other malpractice.

Transparency

In general, transparency is defined as the characteristic of governments, companies, organisations and individuals of being open in the disclosure of information, rules, plans, processes and actions.

A complaint mechanism is transparent when members of the affected community know what entity in the organisation is in charge of the mechanism and possess sufficient information on how to access it.

Communication between the parties should be open and timely, unless information must be limited for confidentiality, privacy or other reasons.

Integrity

Integrity is defined as behaviours and actions consistent with a set of ethical principles and standards, embraced by individuals and institutions that create a barrier to corruption.¹ A complaint mechanism should inhere this principle in design and implementation.

Accountability

Accountability is the concept that individuals, agencies and organisations (public, private and civil society) are held responsible for executing their powers properly. For a complaint mechanism this requires i) compliance with all relevant legislation, regulatory requirements, professional standards and guidelines; ii) the possibility for all parties to a complaint to have decisions reviewed; iii) a complainant who launched a well-founded complaint has a right to appeal and after the appeal, there is no further process; iv) zero tolerance approach against conflict of interest and misuse of the complaint mechanism by people involved in the process of handling it.

ADAPTING AND RESPONDING TO PEOPLE'S NEEDS

The needs of the users and their rights should be at the center of the mechanism, which should be accessible and sensitive to particular cultural elements that may affect the complaint process. An efficient process, proportionate to the complexity of complaints, also helps increase responsiveness.

Accessibility

The mechanism should be easily accessible by people, and should be set up so as to prevent barriers to access, including language, literacy, awareness of the mechanism, poverty, distance, or fear of reprisal.

Responsiveness

All complaints and constructive feedback should be taken seriously and handled swiftly. The complaint mechanism should be responsive to the needs of all citizens who may wish to file a complaint, including vulnerable people or those with particular needs. Feedback from people

¹ Transparency International, *The Anti-Corruption Plain Language Guide* (2009), p, 24.

affected by corruption should be sought and listened to, and be taken into account in the work of the organization and in the way complaints are handled.

Cultural appropriateness

The complaint mechanism should be designed to take into account specific cultural attributes as well as traditional mechanisms for raising and resolving issues, to ensure that the concerns of significantly different groups and subgroups are received and addressed.

Efficiency and proportionality

The complaint mechanism should be efficient and use appropriate methods to handle complaints, according to their level of complexity or sensitivity.

PROTECTING THE COMPLAINANTS AND SAFEGUARDING THEIR RIGHTS

Staff receiving complaints should be aware of risks linked to the act of complaining and to subsequent fact-finding, especially for corruption-related issues. Confidentiality, anonymity and other rights of the complainants should be respected.

Protection

Potential dangers and risks to all parties to a complaint should be carefully considered. Ways to prevent injury and harm, as well as assistance to complainants, should be incorporated into the complaint mechanism. This includes witness protection, personal safety and also data protection and consideration of cyber risks.

Confidentiality and anonymity

Officers should comply with privacy requirements when collecting, using, disclosing and storing information, and will treat all complaints confidentially. They will ensure that any request for confidentiality is complied with unless doing so would pose a risk to the safety, health and well-being of any person. Complainants need to be advised of the possibility of lodging a complaint anonymously, and of the implications of such a procedure, including the consequences for follow up of the complaint. Ideally, at least one channel of the complaint mechanism allows communication with a complainant even when the complaint was filed anonymously.

Rights-compatibility

The mechanism should ensure that its outcomes and remedies accord with internationally recognized human rights standards, and that it does not restrict access to other redress mechanisms.

Impartiality and independence

Decisions made should be impartial. A complaint should be treated on its merits, with an open mind and without prejudice arising from any previous contact between the complainant and the agency. There should be a full and objective evaluation of the facts or evidence provided in support of a complaint. Issues of conflict of interest should be identified and declared to ensure objectivity.

The governance structure of the mechanism should be widely perceived as independent from the parties to a complaint.

All people should be treated equally regardless of a person's age, disability, culture, ethnicity, gender, gender identity, religion or sexual preference.

GOOD PRACTICES FOR IMPLEMENTATION

COMPLAINT HANDLING PROCESS

Implementing a proper complaint handling mechanism requires a step-by step process, ensuring that it is undertaken in time and is of good quality. A proper implementation of a complaint mechanism also necessitates providing sufficient human and financial resources, in addition to applying assigned roles and responsibilities defined during the set-up of the complaint mechanism.

Channels to report complaints

Channels to report complaints should allow all potential complainants to report their grievances. They include email addresses, online and offline reporting tools, helplines, personal conversations, SMS reporting and mobile applications. Nowadays, online reporting tools such as email, online submission forms or online platforms are widely accepted. The reporting mechanisms should be tailored to the needs of the potential users. For example, a walk-in office or a phone message service might be more accessible for some communities. Particular efforts should be made to build trust in the various channels. Anonymous reporting should be possible and accessible.

THE REPORTING MECHANISM SHOULD

- Be free of charge.
- Be easily accessible to communities and seek to reduce the barriers for persons in fear or people with a special need to access the mechanism.
- Provide a range of contact options. All methods should be carefully considered, depending on availability of appropriate infrastructure among communities.
- Allow for the submission of complaints anonyomously.
- Be auditable and transparent.

Publicising complaint handling procedures

In line with the principles of transparency and accountability and in order to build trust in the mechanism, the complaint handling procedure should be publicised. The way it is publicised should take into consideration cultural characteristics and accessibility needs of the respective location or country.

RECOMMENDED INFORMATION TO BE PUBLICISED

- Who can submit a complaint.
- Where, how and when can a complaint be submitted.
- Limitations to the scope of the mechanism (what can be complained about, any limitations to the process etc.) if applicable
- What outcomes can be expected from the handling of the complaint, and what not.
- Which department and senior management function are accountable for the proper handling of the complaint

- What are the timelines and steps for the handling of the complaint.
- What rights and protection are guaranteed, including confidentiality and anonymity.
- Where and how can the complainant follow up (including appeal process).
- How the organisation handles disclosure of information and reporting on complaints.
- What other bodies can receive a complaint (e.g. supreme audit institution).
- Statistics on complaint submissions and resolution: number of complaints received, handled or rejected; potentially issues that are most frequently complained about
- Contact details.

Handling incoming complaints

Incoming complaints handling should be done with care, in line with processes established, in time and should be well recorded in order for the responsible staff to be able to follow up appropriately. The process for handling incoming complaints includes i) receiving and recording complaints and ii) initial screening of complaints and handling of out-of-scope complaints.

HANDLING INCOMING COMPLAINTS

- Record all complaints with an identifier (e.g. complaint number), date of complaint, first actions to be considered and a timeline for response.
- Acknowledge receipt of the complaint as soon as possible, and inform the complainant on potential follow-up and timeline
- Identify complaints that are out of the scope of the complaint mechanism, based on clear pre-defined criteria.
- Apply the principle that two staff conduct independent reviews of the complaints ("foureyes principle") for decision-making.
- If necessary, inform complainants when their request is out of scope, provide them with
- reasons necessary for this decision and possible alternative channels to pursue their grievance.
- Prevent that the complaint be referred or disclosed to any person accused or potentially
- involved in the alleged malpractice without the explicit consent of the complainant, unless required by law.

Processing complaints: analysis and fact-finding

Complaints that are in-scope with the complaint mechanism require a detailed review and analysis, including fact-finding, to have a sound basis for the decision on how to proceed with the complaint. This review should be independent, objective and impartial.

ANALYSIS AND FACT-FINDING

- Focus on finding facts²; avoiding causing damage to evidence or influence witnesses and considering the views and rights of defendants
- Collaborate, where applicable, with law enforcement bodies or other competent institutions or interested parties.
- Record and log activities and findings chronologically and establish a chain of custody for potential later criminal trials.

² Fact-finding differs from investigations: while collecting evidence for criminal investigation is the responsibility of relevant authorities (e.g. police and prosecutors), fact-finding supports in collecting relevant information, mapping patterns and presenting documents obtained to relevant authorities.

Set a reasonable time limit until a decision is taken on whether the case will be referred or handled internally.

Developing a resolution

Option I: Complaints handled by the organisation itself

When possible and appropriate, the complaint should be handled directly by the receiving organisation which has the duty to find the best possible approach towards solving the complaint. This process requires flexibility as there is no "one size fits all" solution. It also requires detailed knowledge of the relevant legal framework, the social, political and economic environment and the characteristics of corruption.

COMPLAINTS HANDLED BY THE ORGANISATION

- Consider resolution options that are adapted to the social, political and economic environment, the subject and nature of the complaint and the person who lodged it.
- Consider data protection and data security issues.
- Collaborate, where applicable, with law enforcement bodies or other competent institutions or interested parties.
- If applicable, take corrective actions to address the matter of the complaint.
 - Regularly discuss progress with the complainant, inform about envisaged corrective
- actions and advise on further possible actions, consultations, mediation and follow up options with relevant stakeholders.

Option II: Referral

When the conclusion of the review and analysis is that a complaint cannot be handled by the organisation or is considered to be optimally handled by another organisation, the complaint should be referred to the appropriate entity or person.

REFERRAL

- Discuss with the referral partner whether and how they will take up the complaint and
- ensure compliance with principles such as confidentiality and protection against retaliation.
- Inform the complainant and seeking his/her consent for the referral, including explaining the referral decision and providing new points of contact.
- Follow up regularly with the complainant and the referral partner on the progress of the complaint handling.
- Provide support to the referral partner to overcome any challenge in the resolution of the complaints.
- Build constructive relationships with relevant referral partners. If possible, a memorandum of understanding should be concluded for future similar cases.
- Advise and exchange with referral partners on good practice for complaint mechanisms to report corruption.

Closing a complaint

Once a complaint is solved and/or the corrective actions are completed and communicated to the complainant, a case can be closed.

CLOSURE OF THE COMPLAINT

- Where applicable, provide complainants with information that their complaint helped to
- identify a problem with larger impact on society and/or development and therefore actions could be taken up to achieve lasting change of relevant policies and practices.
 - Collect evidence that the corrective actions have been taken (e.g. photos or documents,
- a record of resolution, an agreement with the complainant, a confirmation from the complainant).

Handling appeals

There should be an appeal process whereby a review by an independent panel can verify the result of a complaint or of a decision on a complaint being out of the scope of the complaint mechanism.

HANDLING APPEALS

- Establish an independent appeal panel and criteria on its independence and operations.
- Inform complainants on the option to submit an appeal.
- Handle the appeal timely and objectively based on a set of pre-defined criteria and procedures
- Respect the result of an appeal and follow up accordingly.

Recording complaints

All complaints, follow-up actions and contacts with complainants should be recorded. This allows good management of the relationship with the complainant. It also helps effective management of the complaint itself: following up on time, tracing at any time the status of the complaint, providing reliable information to the referral partners, etc.

Recording complaints and related data also provides the necessary basis for reporting about progress and results and compliance monitoring (see below). On an aggregated level, statistics can be obtained, which can be utilised to advocate for change in policies and practice to effectively address the issues raised by complainants.

RECORDING COMPLAINTS

- Set up an appropriate recording mechanism. This should be a complaints database, although a simple log may be sufficient for small-scale, short-term operations.
- Ensure all complaints, results of fact-finding operations and investigations, follow-up
- actions and contacts with complainants and referral partners are recorded in the database.
- Consider anonymization and archiving all records related to a complaint after a certain period of time after closure of cases.

Compliance monitoring

Compliance monitoring is vital to determine whether the mechanism is in line with the principles defined, and assesses the level of effectiveness and efficiency of the complaint mechanism. It is a constant process of proper reviews and amendments and offers an opportunity to discover deficiencies in a timely manner and correct them accordingly. Reports provide valuable information for feedback reports to the organisation's management, communities and other stakeholders.

COMPLIANCE MONITORING

- Establish and implement a compliance monitoring schedule and related requirements.

 This includes quarterly or yearly reporting.
- Share the reports and findings with main stakeholders.
 - Conduct an impact assessment before setting up the complaint mechanism in order to
- ensure that the process and resources put in place are adequate to deal with the volume and types of grievances anticipated.

RFSOURCES

A complaint mechanism is an essential work unit of an organisation. In order to be effectively implemented, objectives, responsibilities, budget, timelines and oversight should be clearly defined, in addition to regular monitoring and reporting being undertaken. This includes a sufficient amount of staffing, clearly assigned responsibilities, utilisation of appropriate technologies and availability of required funding. The resourcing of a complaints mechanism should not be used to interfere in the outcome of complaints.

System set-up, staffing and responsibilities

SYSTEM SET-UP, STAFFING AND RESPONSIBILITIES

- Assign clear roles for strategic oversight of the mechanism and define the role and responsibilities of senior management.
- Clarify cooperation and roles and responsibilities with units working on other areas of resolving corruption cases.
- Define clear timelines for handling complaints and providing responses.
- Develop, implement, and monitor a code of conduct for all staff working on complaints; continuously strengthen the code of conduct through training.
- Ensure the mechanism is appropriately staffed, and staff have the right skills to deal with the complaints. Assign clear roles and responsibilities.
- Train staff on adequate treatment of complainants, including equal treatment, being sensitive to issues that may be critical for safety and security, being responsive, etc.

Technology and data management

TECHNOLOGY AND DATA MANAGEMENT INCLUDE

- Define technology needs in line with strategic decisions on accessibility and target audience. Factor in data protection needs and consider mitigation of cyber risks.
- Consider longer-term requirements for technology and database use and factor these into the strategy.
- Consider human resources required to establish and maintain technology and database solutions.

Funding

Ensure funding for the complaint mechanism for planning, setting up, maintaining and further developing it according to the needs.

ANNEX

ANNEX I: COMPLAINT MECHANISMS: SELECTED EXAMPLES

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Transparency International International Secretariat Alt-Moabit 96 10559 Berlin Germany

Phone: +49 - 30 - 34 38 200 Fax: +49 - 30 - 34 70 39 12

ti@transparency.org www.transparency.org

blog.transparency.org facebook.com/transparencyinternational twitter.com/anticorruption