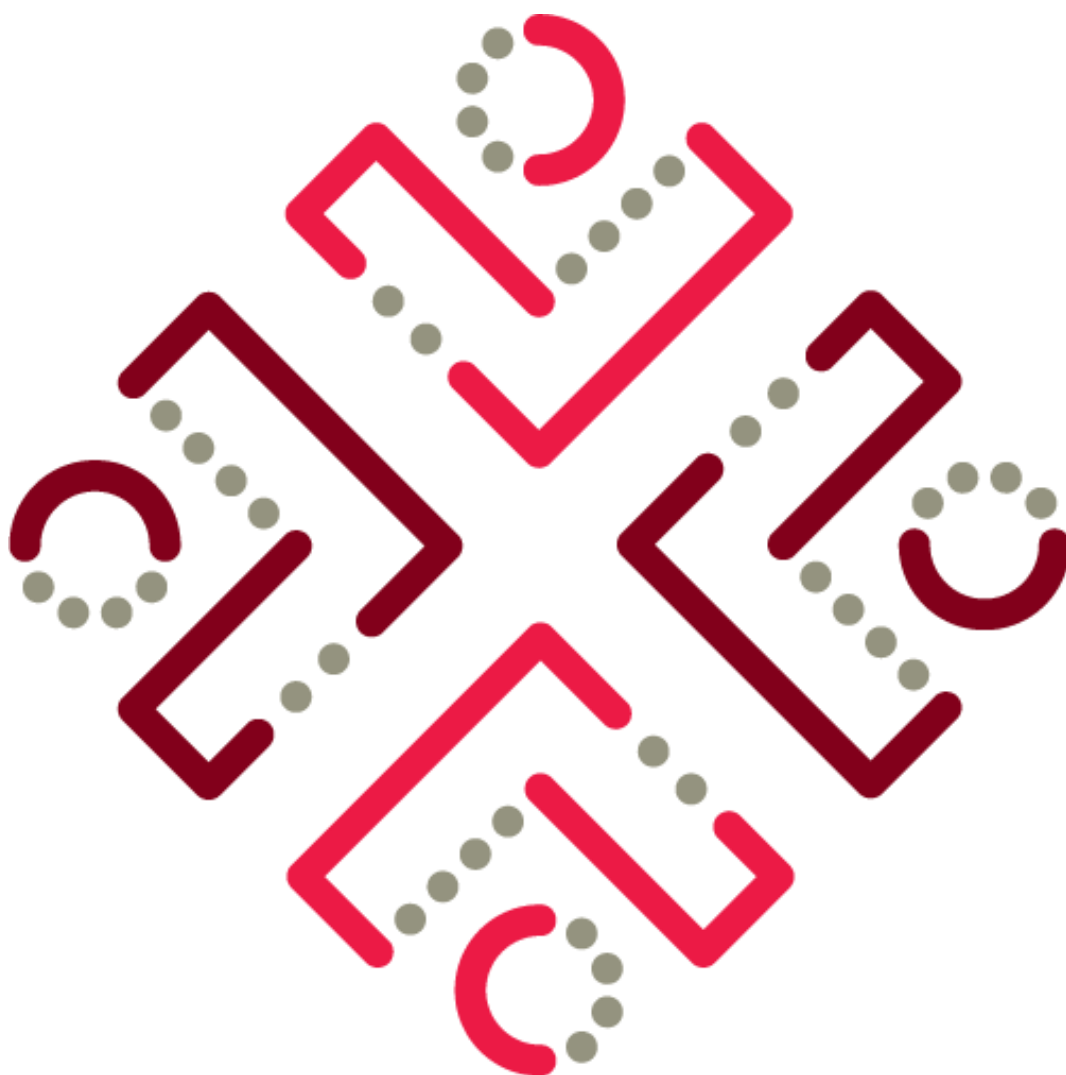


Eight principles for building trust through feedback

Key principles for designing and running accountable feedback mechanisms that can surface safeguarding concerns



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About Bond

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This report was written by Catherine Skehan (Christian Aid) and Laura Hughston (CARE) on behalf of the Bond Feedback and Accountability Learning Group (FALG).

The FALG has been operating since 2013, and as of 2018 it has over 170 members from international development and humanitarian organisations of all sizes. Its members have expertise in establishing and learning from feedback and safeguarding mechanisms in a range of contexts.



Introduction

This paper has been put together by the **Bond Feedback and Accountability Learning Group (FALG)**¹ and sets out best practice principles for developing an accountable feedback mechanism capable of building a safe environment in which safeguarding concerns, within the context of programme work, can be raised. Within the development and humanitarian section, issues of abuse, exploitation and sexual harassment have been identified as a major issue. Action is urgently needed to better safeguard community members and staff from abuse, exploitation and sexual harassment of any kind. For safeguarding to be successful it must take place on multiple levels and be built on the foundations of accountability, transparency and respect – organisational culture and norm change is also necessary to address the root causes of abuse.

Our collective experience accumulated over many years and across different contexts and operating environments has taught us that serious concerns will only be raised when trust in our ability to listen and respond appropriately has been established. This can only happen through a practice that is consistently respectful, accountable and transparent.

Mechanisms for hearing safeguarding concerns on their own and in isolation from our programmatic practice will not be sufficient in creating safe channels for issues to surface. Accountability and feedback mechanisms on the other hand are often not designed with safeguarding at their forefront, but when they are effective, they can create the necessary trust and can become an additional, or even preferred, channel for these concerns. **In this respect, effective accountability mechanisms are a necessary, yet not sufficient, condition for allegations of misconduct and endangerment of vulnerable people to emerge and be acted upon.**

This paper is not intended as a “how-to guide”, as we recognise that the way in which these principles are put into practice will depend on each agency’s mode of operating, procedures, context and resourcing. Instead it aims to put forward a set of universal principles to ensure accountability mechanisms are accessible, meaningful and effective and can be applied across the full range of our organisations, operations and programmes.

Safeguarding, feedback and accountability are intrinsically linked. A key part of any safeguarding process is having processes for people affected by development and humanitarian projects to raise concerns and complaints or give feedback about how they have been harmed by those projects or personnel. It involves people holding development and humanitarian organisations accountable for their commitments to do no harm and act with integrity. This process can only take place when we acknowledge the power imbalance between our organisations and staff, and the communities we work with, and consciously take steps to honour our shared responsibility for our values. This means safeguarding, like accountability, is fundamentally a political process. It requires negotiating power at different levels, creating spaces for traditionally disadvantaged voices to be heard, and establishing trust in order to guarantee that the process is meaningful.

For the purposes of this paper, safeguarding is understood as referring to frameworks or measures that are intended to safeguard everyone who comes into contact with, or works in the organisation, whether they are intended beneficiaries or not. The scope of safeguarding includes the responsibility of organisations to make sure their staff, operations and programmes do no harm to children and

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vulnerable adults or expose them to abuse or exploitation. This must include the full range of individuals and groups we come in contact with, like partners, volunteers, suppliers, contractors etc.²

Eight universal best practice principles

The principles below are intrinsically linked – they build on and support one another and share several areas of overlap. Whilst we chose to arrange them in this order, this is not a reflection of any hierarchy among them nor the belief that a different way of grouping elements under each principle by each agency in each context or language would not be equally valid. These principles provide a practical framework for the establishment of people-centred, accountable feedback and reporting mechanisms for safeguarding and beyond, and can be applied by any agency in any context.

1. Context-specific

Any credible accountability mechanism must be appropriate to the local context, with consideration given to social, cultural and gender norms that may affect reporting. In particular, it is vital to select the channels and modalities for accepting and responding to feedback in consultation with the people who will use them. Community ownership of feedback mechanisms is essential to ensure they are practical and utilised. It is paramount to recognise that communities are not homogenous and that power disparities exist even within households; and our consultations should take this into account.

Meaningful consultations with individuals and groups should:

- Make efforts to fully include all groups and sub-groups, especially the most vulnerable and marginalised. Marginalised groups, especially those who face additional risks, should be consulted separately from other groups.
- Explore barriers to reporting and raising complaints including how complaining about abuses of power is perceived, and resulting stigma or backlash.
- Allow for separate voices to emerge, where appropriate, shielded from influences that can silence diversity of opinion.
- Allowing for different preferences for how complaints are raised, dealt with and responded to, by different groups with consideration given to confidentiality.
- Cover a range of possible channels for sensitive and non-sensitive feedback and explore risks that might arise as a result of reporting (including risks associated with referrals and reprisals, for example, to the local justice or police system and their handling of confidential information and victim protection).
- Throughout the life cycle of an intervention, continue to ensure it remains appropriate to the context and community and to identify any barriers that may have emerged.
- Make efforts to build relationships with a range of organisations representing marginalised people and those facing additional barriers including women's rights organisations, LGBT groups and

² However, in this paper, we are not referring to protecting staff from inappropriate behaviour such as bullying and harassment as that is typically covered by each organisation's procedures.

specialist response services to better understand how to build mechanism that will support reporting of issues of concern.

Literacy rates, access to digital means, mobile phone ownership and native language are some examples of the consideration that can help contextualise different mechanisms. Pre-existing channels that communities are already comfortable using should be considered.

The context also refers to other issues, including the development/humanitarian landscape in the location where the programme is being implemented, and which other organisations are present (see Principle 5: Collective Responsibility); and the legal landscape and relevant laws. Many organisations use frameworks like STEEP or PESTLE to guide their context analysis.

2. Inclusive and accessible

Effective feedback mechanisms must be inclusive for all regardless of gender, age, disability or any other dimension of diversity that may temporarily or structurally diminish a person's power, and specifically their ability to raise complaints and seek redress. Mechanisms must be designed to take account of the needs, risks, vulnerabilities and capacities of specific groups.

Consideration should be given to how barriers to raising concerns can be overcome - whether these are physical, cultural, rooted in fear, or a lack of awareness regarding the mechanism and the right to use it.

Economic considerations including opportunity costs must also be examined.

Recognising the diversity of the people and contexts that we work with, multiple input mechanisms are required to ensure that feedback is heard from a diverse range of stakeholders including the most vulnerable. Multiple channels allow for people with different abilities, language and constraints to come forward and are therefore essential to ensure accountability and that we are able to hear the full breadth of opinions. This principle also applies to the channels used to provide information to communities about the feedback mechanism and how to use it: if these are not chosen well then marginalised individuals may not know how to give feedback in the first place.

Women and girls, as well as people who do not identify as one gender, are often the most at risk of abuse and it is of vital importance that any safeguarding mechanism is responsive to the specific challenges and realities they present. However, it must be remembered that men and boys are also victims and they may face different barriers to reporting which should be considered and explored during the participatory design of the mechanism.

Mechanisms should be accessible, safe, easy-to-use and ensure respect of everyone involved and must include both collective and confidential channels. Both pro-active channels where feedback is directly solicited during the course of activities, and reactive channels for individuals to raise any concerns at a time or place of their choosing are necessary.

These different approaches may all have benefits and drawbacks which should be assessed in consultation with the community and specialist groups. It is important to recognise that accountability mechanisms initiated and owned by an organisation delivering assistance are only one possible avenue for communities to provide feedback and raise concerns. Often people will feel more comfortable accessing informal and/or traditional mechanisms based on personal relationships. All credible feedback mechanisms must have provisions for accepting safeguarding concerns raised in this way.

3. Empowering

Credible feedback mechanisms capable of building trust must be people-centred – or in the case of safeguarding concerns, survivor-centred. To the greatest extent possible they should enhance the individual's sense of agency, as well as their ownership of the issues raised, and the solutions found. This is in recognition of:

- The stark power dynamics that exist between a development or humanitarian organisation on the one hand, and a community member on the other, and how this must be overcome if safeguarding concerns are to be raised; and
- The power dynamics within communities, which prevent some people or groups from being able to raise their voice. For accountability mechanisms to be effective, they must consider these power dynamics and potentially address them.

Establishing a people-centred feedback mechanism means consulting with a cross section of the community during the design phase - channels that have been established through consultation and participation are much more likely to be used and become effective. It also means respecting people's rights to report outside of predefined channels or predetermined opportunities, or to not report at all (and decide when, where and how much they report). In addition, regularly and consistently informing communities and programme participants of our remit, the expected and accepted behaviour of our staff and volunteers, and the limitations of what we are able and not able to do will go a long way towards fostering agency and will also result in more specific and targeted feedback over time.

4. Consistently closing the loop

A safeguarding mechanism is far more likely to be successful if placed against the backdrop of existing broader feedback and complaints mechanisms as these help to establish the trust needed for safeguarding concerns to be raised. Developing relationships with communities, respecting confidentiality, and responding to feedback and complaints within agreed timeframes helps to develop trust and confidence in the mechanism. This requires a commitment to transparency and accountability that must find its root in our policies and procedures and be promoted by the highest levels of leadership through practice and adequate resourcing. Our procedures should also be regularly monitored and reviewed to ensure they remain relevant.

The credibility of our processes and procedures for dealing with feedback and complaints are reinforced by people's consistent experience of confidentiality being maintained, a timely response, an effective and transparent investigation process, and fair and consistent communication.

Experience has shown that there are some simple but effective ways to ensure trust around accountability mechanisms is built and maintained:

- Regular, systematic and predictable closing of the feedback loop³. Any feedback raised must be acknowledged and answered systematically.

³ By closing the feedback loop we mean the action whereby any measures taken as a result of the feedback being raised is communicated back to those who provided the feedback in the first instance.

- Transparency over feedback raised is also important to build confidence in the system and may assist in eliciting further feedback from less-confident and more marginalised groups as it reiterates the right to be heard.
- Even where feedback of a confidential nature is raised, it is important that it is transparently and appropriately acknowledged and addressed with the broader community.
- Investigation procedures are clearly documented, shared and understood by those likely to raise concerns to build trust in the investigation process – this is especially important since it is often during this stage that trust is lost.
- Regular awareness raising about the mechanisms available, established timelines and procedures for responding is crucial in ensuring feedback will continue to be put forward.
- Channels for putting feedback forward should extend beyond those directly targeted by our activity to include other community members, partners, suppliers, institutions etc.
- Regular reporting of changes made as a result of feedback not only strengthens our interventions but further reinforces trust in the value of the mechanism itself.

Feedback provides a powerful learning opportunity to strengthen our practice. To ensure we consistently learn and improve, appropriately anonymised feedback should:

- Be regularly consolidated, including with statistics and shared across relevant stakeholders, to incorporate changes into project design or implementation
- Used to inform further programming and practice, therefore made safely accessible to headquarter staff, donors, technical advisors and relevant others able to shape future interventions

5. Collective responsibility

The success of our interventions as a sector is intrinsically linked to the professionalism with which we approach and work alongside communities and partners. But communities affected by poverty, marginalisation and disasters are often unable to distinguish between the different actors who aim to support them, and nor should they be. These actors may be development or humanitarian organisations, local civil society, and potentially also local/national government depending on the context. As a sector we share common values and objectives and frequently share methods and approaches. We also share a reputation.

Our systems for feedback and accountability need to take this into account and **go beyond the individual brands to recognise that our position of power obliges us to share responsibility for creating safe, respectful and empowering environments for our interventions collectively.**

Effective systems to ensure appropriate and timely referral of complaints and issues raised not only within our agencies but across them should be explored. We should recognise that as employees we often have access to significant resources, information and connections that we should put to the service of giving a voice to those with less power than our own or who are negatively affected by our actions. Where coordination mechanisms are not established, like cluster or sector coordination, we should consider the possibility of creating and utilising a coordination and referral system, even if informal, based on our knowledge and experience of others' expertise.

The absence of an official coordination mechanism should never be used as an excuse for sending community members from pillar to post in search of a response or redress, nor for discharging our collective responsibility.

Our analysis of the operating context should include the presence of other state and non-state actors present, their capacity to respond and risks associated with referring sensitive cases to institutions often with limited capacity to protect vulnerable community members from abuse and stigma.

6. Impartial

No accountability and feedback system could ever be credible and sustained unless there is assurance that the issues raised are looked into thoroughly and with impartiality. This requires exploring the power and incentive systems that affect our staff to enable them to form judgments that are as unbiased as possible. It requires a clear and transparent process for the investigation of safeguarding concerns. It may also require creating or allowing for fall-back or parallel channels where the designated person for reporting has a perceived conflict of interest. An organisational culture that encourages the disclosure of conflicts of interest, and is able to devise alternatives in response, will go a long way towards fostering the required impartiality. The creation of multiple channels also supports this principle allowing feedback to be raised in different modalities (see Principle 2: Inclusive and accessible).

The systematic gathering and review of feedback (see Principle 4: Consistently closing the feedback loop) will contribute to ensuring oversight of the impartiality applied in each case.

7. Do no harm

It is of paramount importance that our mechanisms for receiving feedback – just like our actual interventions – do not negatively impact the people they are designed to support. This is relevant to various elements of a feedback mechanism. Instead of fostering agency (Principle 3) it is possible that the reporting channels chosen could reinforce or exacerbate existing power dynamics. Reporting channels must also be designed so that vulnerable people can report safeguarding concerns without presenting any immediate risk to themselves from doing so.

Once feedback has been given, it is then critical to handle it in a way that does no harm so as not to expose survivors to stigma, retribution and/or retaliation. Confidentiality must be respected and, even if safeguarding concerns are discussed or acknowledged with the community in an anonymous way, consideration must be given to how survivors could still be identified from the information available.

As with all due process, when allegations of misconduct are raised, protection and respect of confidentiality and anonymity, if requested, should be afforded to all parties at the risk of discrediting the system and discouraging further reports.

8. Appropriately resourced

All of the points above have resourcing implications, including consultations with the community and setting up multilingual channels. This is an area where donors should play an important part in ensuring the transparency and accountability of our programmes as well as our collective responsibility.

Effective accountability mechanisms need to be resourced both in terms of the physical infrastructure (such as telephones for a hotline or a computer to access a database) as well as investment in staff training and awareness-raising. Staff will need to gain soft skills such as receiving and referring complaints, detecting safeguarding issues even when no complaint is raised, or acting with confidentiality. Meanwhile dedicated safeguarding staff will need training and support to ensure they are able to manage safeguarding incidents. We must remain mindful of staff turnover over time and ensure our resources are able to ensure good practice is followed throughout the life cycle of our projects. Indeed, sufficient resources are needed to implement effective feedback systems on an ongoing basis even when no cases are identified. Resources should also be directed to help create sustainability so that local communities can continue to have a voice after individual agencies have left.

The level of resourcing necessary will depend on circumstances. Some organisations may choose to set aside a proportion of project budget specifically for feedback and accountability mechanisms, while others may vary this in each intervention. The FALG group does not recommend always having a budget allocation, but believes that there are resource implications for each of these eight principles and for ensuring adequate capacity is in place and maintained.

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