

# **POLICY DOCUMENT**

## **‘COMPLAINT HANDLING’**

### **POLICY AND PROCEDURES**

**Date of Implementation: January 2017**

**Date of Revision: January 2018**



**Caritas Sri Lanka**

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# POLICY

## 1. Introduction

Caritas Sri Lanka as the social arm of the Catholic Church in Sri Lanka focus its vision and mission to promote Justice, Peace and Human development among all communities. Based on the experiences gained through the community development involvements for about 48 years, Caritas Sri Lanka applies the right based approach to secure the dignity of person/community and ensure minimum standard of living for the marginalized.

Through the enormous services and programmes Caritas Sri Lanka addressed the burning issues of infringement of Fundamental Rights; economic liberty; cultural autonomies of different races respecting pluralism of people. CSL and its network staff's initiatives were such they lived the word of God in their very deep sense and witnessed the power of the HOLY SPIRIT in animating and empowering every stakeholder involved.

Therefore, at Caritas, as a Church based humanitarian organization, stakeholder service and satisfaction will be the prime concern. Stakeholder complaints are part of our strategic concerns that we pay utmost attention.

Caritas perceives complaints as an important way for the management of this organization to be accountable to the public, as well as providing **valuable prompts to review organizational performance and the conduct of people that work within and for it.**

This **Working Draft** once approved will be **valid only for a period of one year.** (*From the learning of first year and stakeholders' feedback this policy document could be revised during the second year in order to make it more effective*).

## 2. Objective

The objective of this policy document is to reach the extra mile of our understanding and bringing solutions to the unknown side of our activities through the eyes of our beneficiaries and stakeholders.

The realization of this policy will strengthen the right-based approach of '*Learning by Doing*' of Caritas Sri Lanka to enhance the community ownership of projects/programmes. It will in return, reduce the valuable administrative and community cost, which may occur due to the error of repetition and other reasons, in the future project implementation.

This policy document intends to stop and minimize mishandling of any resources and materials etc., at Caritas and to streamline the working conditions to create better ethical environment. Further, it will also pave the way to accomplish a more effective and result based restructuring of the organization.

### 3. Complaint Definition

**Complaint Handling Box** is a sealed physical wooden box with an opening to slip through written complaints.

A **complaint** is a written communication received by Caritas through its Complaint Handling Box (CHB) which expresses a certain degree of dissatisfaction or any other about any aspect of Caritas' activities, services, programmes, etc.

The complaint should have indicated a clear source of origin, so as to receive a notification with regard to the action taken by Caritas. (Source of Origin – **Name, Address**, telephone no, email etc.)

No anonymous written complains will be accepted by the Complaint Handling Box but would be read to attain the general view and perception of the direction indicated.

No oral complaints will be accepted at all.

### 4. Policy Statement

The complaints which Caritas receive through the mechanism of Complaint Handling Box would be addressed professionally, competently and in a timely manner with the application of the **principles of natural justice** while assuring the confidentiality.

At all instances the complaint handling mechanism will ensure and maintain a high dignity and respect for the people involved.

### 5. Scope and Application

This policy is implemented by using the complaint handling procedures. The complaint handling policy and procedures would be accessible to anyone interested and known to all staff, parish priests, government officers, stakeholders, donors and beneficiaries etc.

The policy applies to all activities which come under the Caritas National Centre and the network of 13 Diocesan Centres. Any complaint which has no relevance to Caritas activities or programmes will be discarded by Complaint Handling Committee (CHC).

#### 1. Awareness Building on 'Complaint Handling Box'

As soon as the working draft of the Complaint Handling Box is approved by Board of Management, a dynamic Awareness-Building Campaign will begin.

- 1) All Diocesan Directors will sign the contract and will be liable to implement the Complaint Handling Policy and Procedures in their respective dioceses henceforth.
- 2) All Dioceses will conduct a full scale orientation programme for Diocesan Director and staff on Complaint Handling Box and its Policy and Procedures.
- 3) Caritas National Centre through its Diocesan network will notify all their stakeholders.
- 4) Brochures with the details of Complaint Handling Policy and Procedures will be sent to parishes to be distributed among the public.
- 5) All community institutions such as CBO/SHG and their leaders who were/are under Caritas' Programmes will be made aware of the Complaint Handling Box and how to access it.
- 6) It would be made mandatory that all the programme stakeholders of any future programme, implemented by Caritas, will have thorough 'what and how' of policy and procedures of Complaint Handling Box.

## **2. Location for 'Complaint Handling Box'**

Complaint Handling Box will be available **24 hours a day, 7 days a week** at all the 13 Caritas Diocesan Centres. Diocesan Directors will use his discretion where to install the CHB to achieve its ultimate objectives better.

Caritas National Centre in Colombo will also have a Complaint Handling Box at an appropriate place.

Dioceses will be encouraged to install Complaint Handling Box at parishes or religious institutions where there is/was a localized programme of Caritas, since 2013.

# PROCEDURES

## 1. Making and Receiving Complaints

This section would explain the procedural process how a complaint would be addressed step by step.

### a. Opening the '*Complaint Handling Box*'

- **Who?**

The foremost responsibility and sole authority to open the CHB shall lie with the below designated persons.

At National level Complaint **Handling Committee (CHC) will be** a panel of 3 persons comprising National Director, Senior Executive Manager, and a member from the Advisory Board or Finance Advisory Committee

Diocesan Caritas Centres may also form their particular Complaint Handling Committee (CHC) in line with the above National Complaint Handling Committee. (**Guide:** Diocesan Director, One Senior Manager, Community Leader or Religious Representative.)

**Key of the box** will be properly sealed and kept with the particular CHC at relevant location.

- **When?**

The proposed time schedule for opening the Complaint Handling Box would be once in two weeks, at a precise time set by the Caritas Management.

There must be **not less than 3 persons** from CHC at a time of opening the Complaint Handling Box.

### b. Categorizing Complaints

Complaint Handling Committee will open the Complaint Handling Box and will take out the written complaints for review. They will categorize the complaints according to their content and would enter them into an official **Complaint Register**. All complaints shall be logged in the register by the end of the same day.

Complaint Handling Committee shall assign a unique **Complaint Tracking Number (CTN)** to each and every complaint.

All the CHC members present at the time of the opening of the CHB will sign on the Complaint Register. Hereafter the categorized complaints will be officially handed over to the relevant department for further review and resolution.

If the complaint is about a person who is on the list of Complaint Handling Committee membership, Director with the management will decide upon a transparent resolution framework, considering the ground situation. In such instance, Director may use his discretion accordingly.

#### **c. Acknowledging and Recording**

The complaints will go through a process of verification in the relevant departments/units for the initial acknowledgement. Departments/units will inquire the complaint, in line with **the principals of Gospel Values, Human Dignity and Rules of Natural Justice**, to reach a resolution. *(This will be a dynamic process which would take considerable time as required by the process.)*

The committee will record all the findings, the process of inquiry, procedures and recommendations proposed. Special cases will be used for **“Lessons Learnt”** but strictly ensuring confidentiality of persons involved.

#### **d. Assessing and Referring Complaints**

The departments/units will be allowed by Complaint Handling Committee to respond to the complaints only after the due initial inquiry/investigation for the purpose of verification of content of the complaint. The department must conduct the verification and the authenticity of facts forwarded through the complaint.

The observations and conclusions made over the findings need to be agreed by majority of the bench.

If the department committee, at the end of all the procedural process cannot reach a consensus, they will inform the matter to the relevant Diocesan Director and sought the support of the outside resource personnel at the discretion of the Diocesan Director.

#### **e. Access to Support**

The person who made the complaint and the person responding may access support. If meetings with the parties are held, the parties may have a support person present.

It is the duty and responsibility of the CHC and department committee to resolve the matter in an equitable, objective and unbiased manner.

They must ensure that any **conflicts of interests** are declared.

#### **f. Final State of the Complaint**

All the registered complaints must be resolved using the maximum resources available. CHC will have the authority to monitor each registered complaint using the CTN till the end.

CHC will decide on all occasions whether to correspond with the complainant.

## **2. Confidentiality**

The privacy of the complainant, complainee and the evaluating process should be attended on all occasions.

The personal information of the complainant and any people who are the subject of the complaint should be kept confidential and only used for the purposes of addressing the complaint and any follow up actions.

## **3. Record Keeping**

CHC and each department/unit will keep written records of the complaint resolution process and outcomes.

Complaint records will be filed and stored appropriately. NC or DC may opt to their best systems in ensuring confidentiality of the details of the complaints.

## **4. Reviews / Appeals**

There are opportunities for the internal and external review on the Complaint Handling Committee and Department Committee's responses or actions taken.

However, it should be requested with reason and in writing by complainant, complainee or any other interested party.

There is no option of review if the matter has been resolved by agreement of the parties.

National or relevant Diocesan Director will form an emergency review team, in case of a review/appeal being requested.

The reviewer will record action taken.

The reviewer's decision is final.



## 5. Conclusion

Complaint Handling Committee and the department shall hold the accountability for overall compliant handling mechanism.

All the Diocesan level CHCs shall submit their **Quarterly Report** on 'Complaints and Action Taken' to Caritas National Centre CHC **on a set date**.

After compiling the Diocesan reports, National CHC will present *Final Quarterly Report on CHB* to BoM on a set date.

This will act as a valuable data base for future reference and a guideline for the organizational restructuring.


## ABBREVIATIONS

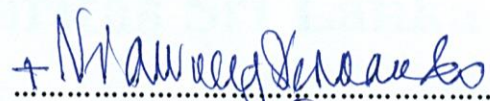
1. CSL	Caritas Sri Lanka
2. NC	National Centre
3. DC	Diocesan Centre
4. DD	Diocesan Director
5. CBO	Community Based Organizations
6. SHG	Self Help Groups
7. CHB	Complaint Handling Box
8. CHC	Complaint Handling Committee
9. CTN	Complaint Tracking Number

## DEFINITION OF KEY TERMS

- **Complainant** is the person who makes the complaint.
- **Complaine** is the person the complaint is made about; the subject of a complaint.
- **Complaint Handling Committee** is the formal group made up of not less than five persons, comprised of Director, Manager, programme coordinator, community leader and a religious representative.
- **Conflict of Interest** means a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.
- **Dissatisfaction** means the attitude of lack of satisfaction, discontent or displeasure one displays.
- **'Community Cost'** means the lost, difficulties, time-waste to the community lack of opportunities incurred due mishandling of projects/programmes.
- **Natural Justice** is technical terminology for the rule against bias and the right to a fair hearing.
- **Support Person** When the complainant or complaine cannot defend or justify the case individually due to lack of knowledge about the case or its findings, he/she may access support of an external/ internal adult person.
- **Review** a formal assessment of the response and 'actions taken' in order to verify its authenticity.

Approved.

  
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