

# **SPO's**

## **COMMUNITY ACCOUNTABILITY REPORTING MECHANISM (CARM) POLICY & PROCEDURES**

**Initial Approval: June 1, 2025**

**This policy is endorsed  
by the SPO Board of Directors.**

**Approved By:**

A handwritten signature in black ink, appearing to read 'Arifa Mazhar', written over a horizontal line.

**Arifa Mazhar  
Chief Executive**

## **Introduction**

The Complaints Management Unit (CMU) was established to improve downward accountability to SPO's beneficiaries and access to critical information in emergency and non-emergency situations.

The Complaints Management Unit will be the first response unit for all complaints and feedback received by Complaint/Feedback Channels. The CMU will also provide support to all project teams in investigating and resolving the complaints that they receive.

The objective of this section is to ensure that complaints and feedback from beneficiaries are heard, recorded and resolved effectively and professionally in accordance with SPO's organizational principles.

### **1. Policy Statement**

SPO welcomes the opportunity to receive complaints and feedback to identify areas of service that need improvement, to respond to and resolve individual dissatisfaction and to strengthen the relationship between SPO and the community being served.

SPO is committed to:

- Deal with complaints and feedback in accordance with its Complaints and feedback Handling Policy, which has been laid down in the light of Humanitarian Accountability Partnership (HAP) benchmarks for upholding the elements of quality and accountability;
- Engage beneficiaries and the community on appropriate ways to handle complaints and feedback;
- Ensure that intended beneficiaries, communities and staff understand the complaints and feedback handling procedures;
- Encourage members of the community dissatisfied or want to provide feedback to the organization to lodge feedback directly to the organization and facilitate such action by making complaint and feedback forms freely available.

This policy demonstrates the following:

#### ***Commitment***

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

#### ***Procedural Fairness***

Fair complaint-handling procedures are integrated into our activities, and beneficiaries know our processes. Confidentiality is respected at all times, levels and decisions are communicated, as is the rationale for those decisions.

Complaints and feedback are to be managed openly and transparently, allowing review by all relevant parties. In doing so:

- Decision makers act fairly and provide reasons for decisions;
- The person affected is given a fair chance of hearing and an opportunity to review;
- All relevant information and arguments are considered before a conclusion is reached.

### ***Resources***

We have adequate resources for complaint and feedback handling with sufficient levels of designated authority. We further identify the need for the complaints and feedback system to be reviewed regularly.

### ***Visibility***

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

### ***Responsiveness***

Complaints and feedback shall be dealt with as quickly as possible, and the complainants shall be treated impartially.

### ***Accountability***

Our processes will take into account community members' preferred methods for making a complaint and feedback, and will be reviewed with consideration of their level of satisfaction with the system.

We have appropriate documentation and reporting of the complaints and feedback handling process against documented indicators as set out by the Humanitarian Accountability Partnership 2010 Standard in Humanitarian Accountability and Quality Management.

## **1.1 Definition of a Complaint**

- A complaint is any expression of dissatisfaction with a service SPO offers or provides. This includes matters such as:
- Unfair, inappropriate, or incorrect management;
- Improper behavior, misuse of authority, or partiality by an SPO staff member toward an individual or group of beneficiaries;
- Abrupt, rude, or aggressive behavior by an SPO staff member towards a beneficiary, either in person or via telephone;
- Breach of existing SPO policies and procedures;
- Demand for any unfair or undue favors by SPO staff or management from beneficiaries, volunteers, vendors, or any other stakeholder in the field or elsewhere;
- Sexual Exploitation, Abuse, and Harassment (SEAH) related complaints.

## 1.2 Who can make a complaint?

Any person, household, group of persons, organization or partner can provide feedback about the SPO programme, activities, staff, implementing partners, project supplies and suppliers.

## 2. Procedure

### 2.1 Reporting

The Complaints Management Unit (CMU) will ensure that all complaints and feedback received are shared with management. This unit shall comprise of the following Members:

- i. Head of Internal Auditor (CMU Convener)
- ii. Chief of Corporate Affairs & Company Secretary (Member)
- iii. Head of Programme (Member)
- iv. Manager, Human Resources (Member)
- v. Manager, Finance (Member).

Each quarter, the CMU will produce a Complaints and feedback Report that will be presented to the Chief Executive, and major findings will be shared with the senior management for them to improve learning and programming across SPO.

### 2.2 Receiving a Complaint

Complaints will be accepted verbally, in writing, in person or by telephone (voice and text).

Complaint/Feedback channels are essential communication tools that allow individuals or groups to provide feedback, opinions, or suggestions to the organization. This policy aims to outline the four commonly used feedback channels: Hotline number, Email Address, In-person and Postal Address. Complaint/Feedback Channels that are in place are:

Complaint/Feedback Channels	Description
Hotline Number	The hotline number (0331-2123477) is the number that individuals can call to provide feedback, report issues or concerns, or seek assistance.
Email Address	Beneficiaries and community members can send their complaints or feedback directly to our dedicated email address at <a href="mailto:complaints@spopk.org">complaints@spopk.org</a> . All submissions will be handled confidentially and in accordance with our complaints handling procedure.
In Person	Complaints can be submitted in person at the SPO Offices, during office hours (0900 to 1700 hrs.). A designated staff member will be available to listen to and record your concerns confidentially.
Postal Address	Complaints can be sent in writing to the Complaints Focal Person (HR Associate at NC) at the following address:  Building No. 1-B, Street No. 26, Sector G-9/1, Islamabad.

As a general rule, all complaints/grievances shall be dealt with using the following:

acronym 'ELERE':

- Endeavor to answer each complaint positively,
- Listen to what the beneficiary is saying,
- Empathize with what they are saying,
- Repeat/reinforce your understanding of the situation,
- End the call or meeting in a positive manner.

### **2.3 Receiving Complaints and feedback: Verbal**

It is the responsibility of all SPO staff to receive complaints and feedback from beneficiaries and send it to the Complaints Focal Person (HR Associate at NC) immediately. Where possible, complaints and feedback should be submitted in writing by the complainant. Should the complainant be unable to do this, the following process shall be followed:

- i. Identify yourself as an SPO staff member, listen, record details, and determine what is the complaint or question.
- ii. Explain the SPO's confidentiality policy.
- iii. The complainant must be advised that they have a right to be heard and provide evidence in support of their complaint if they desire.
- iv. Speak with the complainant courteously.
- v. Explain the complaint handling process and the steps that will be followed once the complaint is submitted.
- vi. Do not attempt to lay blame or be defensive; seek first to understand.
- vii. If possible, resolve the complaint immediately or commit to a timeframe for investigating the complaint further. Don't promise things you cannot deliver or create false expectations.
- viii. Introduce and explain the Complaints and Feedback Form, and fill it out with the complainant.
- ix. Check whether the complainant is satisfied with the proposed action, and if not, consider an alternate course of action.
- x. Upon completion of the conversation with the complainant, the staff member will complete a file note for the complainant to sign.
- xi. Complete the Complaints and Feedback Form. Retain a copy and return the original immediately to the Regional Manager or the Complaints Focal Person (HR Associate at NC) in Islamabad. Both the Regional Manager and the Complaints Focal Person will keep the original documentation on file.
- xii. Advise the complainant that the complaint will be forwarded to the Management, who will contact them within 7 days or sooner, depending on the nature of the complaint.
- xiii. Confirm the details received with the complainant.
- xiv. Provide details of the Management and the Complaints Focal Person for their future reference, and thank the complainant for their time.

## **2.4 Receiving Complaints: Written**

The written complaint should clearly state:

- The exact dissatisfaction or problem.
- The complainant's contact details. However, if there are protection concerns, these details may not be provided.
- Date of the alleged incident.
- Details of the issue or problem.

Complaint and Feedback forms will be available in the local language and accessible to the community and beneficiaries.

Written complaints can be:

- Sent to the Complaints Focal Person (HR Associate at NC), Islamabad
- Given to an SPO staff member
- Sent to the Email Address.

All complaints and Feedback will be given to the Regional Manager and later to the Complaints Focal Person (HR Associate at NC) in Islamabad for recording and processing.

## **2.5 Receiving Complaints: Mobile**

- i. Identify yourself as an SPO staff member, listen, record details and determine what the complaint or question is.
- ii. Explain the SPO confidentiality policy.
- iii. The complainant must be advised that they have a right to be heard and supply material in support of their complaint if they desire.
- iv. Complete the Complaints and Feedback Form and confirm the details received with the complainant.
- v. Advise the complainant that the complaint will be forwarded to the Management, who will contact them within 7 days, depending on the nature of the complaint.
- vi. Provide details of the Complaints Focal Person for their future reference, and thank the complainant for their time.

## **2.6 Receiving Complaints: Mobile (SMS / WhatsApp)**

- i. The designated number to which complaints can be sent is 0331-2123477.
- ii. Call back the complainant and advise them that they have a right to be heard and provide evidence in support of their complaint if they desire.
- iii. Complete the Complaint and Feedback Form and confirm the details received with the complainant.
- iv. Advise the complainant that the complaint will be forwarded to the Management, who will contact them within 7 days or sooner, depending on the nature of the complaint.
- v. Provide the name and contact details of the Complaints Focal Person for their future reference, and thank the complainant for their time.

## 2.7 Complaints Procedures When Working with Downstream Partner Organizations

- i. SPO will work with downstream partners to agree on how they will raise and handle complaints against each other in a safe and accessible way.
- ii. SPO will provide a copy of this policy to partners so that partner organizations are made aware of the relevant policies and procedures adhered to by SPO.
- iii. SPO will sign an MOU with Downstream Partner Organizations, having a declaration that both parties will follow the complaints procedures. This Policy can be annexed to any partner organization's Agreement.

## 3. Complaints Handling - Responsibilities

### 3.1 Complaints Management Unit Responsibilities

The responsibilities of the Complaints Management Unit (CMU) include:

- i. Management of the Complaints Management System.
- ii. Ensure that the complaint is resolved within the fastest possible timeframe. If a timely resolution is not possible, the complainant should be notified and the reasons for the delay explained.
- iii. Ensure that beneficiaries, affected communities and staff understand the complaints handling procedures.
- iv. Monitor that a complaints file is opened for each complaint received and contains at least the following information:
  - The Complaints Entry Form;
  - Copies of background data (i.e., files, notes, etc.);
  - File notes of interviews with relevant staff;
  - Copies of all correspondence sent to the complainant in relation to the complaint;
  - Action plan to resolve the complaint.
- v. Discuss the number of complaints received and develop an action plan to resolve them.

Table outlining the category and grade of complaint/feedback, type of feedback, forward to whom, and response time:

Category and Grade of Complaint/Feedback	Type of Complaint/Feedback	Forward to Whom	Response Time
High Priority – Grade A	Urgent and critical feedback that requires immediate action (Related to Fraud, Forgery, Sexual Harassment, Exploitation, Abuse, Safeguarding, and Safe programming)	Senior Management/ Department Head/ Regional Manager/ Mercy Corps' CARM team via <a href="mailto:pk-carm@mercycorps.org">pk-carm@mercycorps.org</a> or reach to the Integrity hotline via <a href="mailto:integrityhotline@mercycorps.org">integrityhotline@mercycorps.org</a> (For TB Program-related Complaints Only)	Within 24 hours

Medium Priority – Grade B	Important feedback that needs attention but is not urgent	Regional Manager/ Team Leader	Within 48 hours
Low Priority – Grade C	General feedback or suggestions for improvement	Relevant Department or Regional Team	Within 7 days

*Note: Response time may vary based on the complexity and nature of the complaint/feedback.*

- vi. When responding to the complainant, ensure the following information is provided:
  - Address the issue raised in the initial complaint;
  - Who to appeal to if they are not satisfied with the resolution of the complaint.
- vii. The Complaints Focal Person will produce a quarterly Complaints Analysis and Feedback Report for dissemination to the senior management.

The additional steps for ensuring that complaint and feedback is received, verified, logged, graded, acted upon, and closed:

Step	Process
1.	Complaint and Feedback is received by the organization through various channels such as hotline numbers, emails, In-person or through postal address.
2.	The complaint and feedback is verified by the Complaint Focal Person or designated team member, or department to ensure that it is authentic and relevant.
3.	The feedback is logged in the CARM feedback database by the CARM focal point. The feedback is recorded along with relevant details such as the category, grade, date and time, and the contact information of the feedback provider.
4.	The complaint and feedback is graded based on its severity, impact, and other relevant criteria by the CARM partner focal point. The grading helps to prioritize the feedback and determine the appropriate response time.
5.	The complaint and feedback is forwarded to the relevant department or team based on the regional head on its category and grade. The department or team takes action to address the feedback within the designated response time.
6.	Once the action has been taken, the complaint and feedback is closed by the department or team. The CARM partner focal point updates the feedback status in the CARM feedback database, and the feedback provider is notified of the action taken.

By following these steps, the organization can ensure that feedback is received, verified, logged, graded, acted upon, and closed in a systematic and efficient manner. The CARM feedback database helps to keep track of the feedback status and facilitates communication with the feedback provider, ensuring that their concerns and suggestions are addressed in a timely and effective manner.

### ***Initial Response***

The Complaints Management Unit is the initial point of contact for anyone (beneficiary or not) who has registered a complaint, asked a question, or made a suggestion. It is the responsibility of the Complaints Focal Person to contact the complainant and collect the details of the complaint and the complainant. This will be done confidentially, neutrally and impartially.

### ***Addressing Complaints***

Depending on the severity or complexity of the complaint, the Complaints Focal Person may resolve some categories of complaints over the phone. If the query concerns processes, the Complaints Focal Person will explain SPO's approach and attempt to satisfy the complainant without requiring a field visit. If this is not possible, the Complaints Focal Person will refer the complaint to the CMU. The CMU will ensure sensitivity to cultural barriers and norms and will provide female staff to engage with community women at all levels complaints.

### ***Referring Complaints***

The Complaint Focal Person has collated the relevant details of the complaint. S/he will either resolve the complaint over the phone or refer the complaint to the relevant party. Depending on the severity of the complaint, this will be sent to the Management.

Once the referral has been sent to the Management, they will be responsible for investigating the complaint and resolving the issue as per the procedures.

### ***Closing Resolved Complaints***

Once a complaint has been addressed and a resolution has been agreed upon, the following steps should be taken to formally close the matter:

- i. Verify Resolution**  
Confirm with all relevant parties that the issue has been resolved to their satisfaction and that no further action is required.
- ii. Document Outcome**  
Record the details of the resolution, including actions taken, agreements made, and any supporting evidence or communication.
- iii. Final Communication**  
Provide a written summary of the resolution to the complainant and any other involved stakeholders, outlining the outcome and confirming closure.
- iv. Update Complaint Log**  
Mark the complaint as "Closed" in the official complaint register or tracking system, including the closure date and the responsible officer.
- v. Review and Reflect**  
If applicable, conduct an internal review to identify any systemic issues or opportunities for improvement revealed by the complaint.
- vi. Archive Records**  
Ensure all documentation related to the complaint is securely stored in accordance with recordkeeping and archiving SOPs. Confidentiality of the complaint record will be ensured, and access will be given only to the Inquiry Committee and the Chief Executive.

### **3.2 Document Retention and Weeding Out Policy**

SPO has a written, mandatory document retention and periodic weeding out policy that will be complied with in this case also.

## **4 Outreach Guidelines**

### **4.1 Outreach plan design**

At the beginning of each outreach plan, the project teams must create a plan for the outreach campaign. This campaign must reach all of the beneficiary villages and involve as many beneficiaries as is feasible.

### **4.2 Design of Posters, Banners and Leaflets**

Following the design of the outreach plan, the materials will be designed. These should be in local languages with clear messages. These should also be designed with illiterate community members in mind, so they should contain pictorial representations of how to engage with SPO's Complaints Management System.

### **4.3 Distribution of Posters, Banners and Leaflets**

Posters and banners shall be distributed in each community, in addition to leaflets that can be handed out directly to community members.

### **4.4 In-person demonstrations**

At the same time as the posters, banners and leaflets are distributed, the project teams will conduct corner meetings with beneficiaries and community members in order to provide in-person explanations and demonstrations of how to use the system. During these meetings, the project teams shall explain why SPO wants to hear feedback and complaints from the community and assure the beneficiaries that there will be no negative impact as a result of their feedback. Practical demonstrations shall be provided on speakerphone so that community members understand how the system works.

### **4.5 Sustained refreshers during field visits**

In all subsequent meetings with beneficiaries, the field staff will refresh their knowledge about the system, how it can be useful to them, and how it works. They will continue to distribute IEC material in the villages during meetings.

## **5. File storage and Data Management**

The complaints record, including all beneficiary information, will be stored on a designated official system and will be password protected to keep unauthorized computers from gaining access.

No records or complaint archives are to be loaned to parties outside the organization.

To preserve the integrity of information contained in the original complaint, no additions or alterations of any kind are to be made to any record. This includes purging, adding or removing papers or annotating papers. If there is a need to record future developments or a change in circumstances, or otherwise reflect inaccurate information or deficiencies, a further document can be generated and attached to the file.

# ANNEXES

**COMMUNITY COMPLAINT & FEEDBACK FORM**  
(RECEIVED THROUGH STAFF)



SPO STAFF DETAIL:	
NAME:	
DESIGNATION:	
PURPOSE OF VISIT:	
DATE OF VISIT:	

COMPLAINT DETAIL:	
COMPLAINANT NAME:	
CNIC NUMBER:	
MOBILE/PHONE NUMBER:	
UC NAME:	
VILLAGE NAME:	
COMPLAINT DETAILS:	

Complainant Signature:

SPO Staff Member Signature:

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## BENEFICIARY COMPLAINT & FEEDBACK FORM



COMPLAINT DETAIL:	
COMPLAINANT NAME:	
CNIC NUMBER:	
MOBILE/PHONE NUMBER:	
UC NAME:	
VILLAGE NAME:	
COMPLAINT DETAILS:	

Complainant Signature: \_\_\_\_\_

Date Submitted: \_\_\_\_\_

For more information, complaints or feedback, please  
dial the SPO hotline number: 0331-2123477

**UNDERTAKING**  
***COMPLAINT HANDLING***



SPO sees complaints as opportunities to improve our service. We welcome complaints as they help us identify areas of our program or internal processes that might need to be changed to help us improve quality and accountability.

SPO values that all staff and those it works with should be accountable for what is done, and that conduct should be in a manner that is professionally and financially sound, efficient and effective. As an employee of an office with a community complaint handling system, you are required to adhere to the CARM Policy and Procedures.

I acknowledge and agree that I have read, understood and will adhere to the policy and procedures outlined in the CARM Policy and Procedures.

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_