



COMPLAINTS POLICY

Redrafted: October 2021

Date Approved by Vita Board: 08 December 2021

Signed: _____

Céline Reilly
Chair of Vita Board

Signed: _____

John Weakliam
Vita CEO

Date: _____

Date: _____

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Vita Complaints Policy

Purpose

At Vita (RTI), otherwise known as Vita, we conduct our work in an honest, open, and ethical manner, and in compliance with the law. This policy sets out steps to enable people to safely raise a concern or make a complaint in respect of our work and to be assured that appropriate action will be taken.

This policy describes how Vita receives, deals with and responds to complaints. The policy sets out the scope and parameters of the complaints that Vita responds to and the complaints handling process. The policy provides practical guidance in implementing basic mechanisms for handling and responding to complaints.

Vita's Board(s) and Senior Management Teams are committed to the implementation of this policy across the organisation and in our programmes and projects. Accordingly, they will ensure that:

- Sufficient resources and expertise are provided to handle complaints.
- Staff are briefed on the nature and purpose of this policy and designated staff and senior managers dealing with complaints are trained in their handling.

Complaints: Scope and Parameters

A **valid complaint** is a complaint about actions for which Vita is responsible and is both relevant and within the control of Vita. Vita can only accept complaints about matters that are within our power to respond to, answer or solve. Valid complaints are about:

- Vita (as an organisation)
- Vita's programmes/projects and activities
- Behaviour of Vita staff, volunteers, Board members, guests and affiliates i.e. external consultants/contractors hired by Vita
- Vita's partner organisations and the behaviour of their staff¹

Vita is accountable for the promises and the commitments we make, what we do and how we do it.

Vita responds to complaints regarding:

- Vita programme decisions such as targeting of the goods/service and programme participant selection criteria;
- Quality and quantity of the goods/services provided by Vita;
- Appropriateness of the goods/services received from Vita;
- Behaviour of Vita staff, or anyone associated with our programmes;

¹ Where it is included or referenced in relevant bid or tender documents, agreements, memorandums, purchase orders or contracts. *Complaints about the behaviour of government employees, who in their professional capacities and regular duties participate in actions supported by Vita, should be made through existing official channels and institutions which have the formal mandate to take appropriate action and provide accountability to the complainant.*

- Misuse of Vita's funds;
- Adequacy/accuracy of information provided by the organisation.

Definition of terms and concepts

A **Complaint** is a grievance made against Vita or more specifically against one of its employees, who has allegedly failed to meet a commitment. That commitment might be related to our activities, our use of resources, our mission and values, staff conduct / behaviour or a legal requirement. It is a criticism that expects a reply and would like things to be changed.

Feedback is a positive or negative informal statement of opinion which is shared for information only but not with the intention of lodging a formal complaint. Feedback is all about provision of information either positive or negative. Feedback can inform changes in how the organisation functions and/or programme/project implementation.

NOTE: Vita will ensure that community feedback about how our programmes are viewed and experienced is fully integrated into Vita's standard participatory programme design, monitoring and evaluation processes. However, we acknowledge that community feedback may come through other channels and we welcome feedback no matter how it arises. Accordingly, Vita will be ready to respond to community feedback if received outside of our routine programme design, monitoring and evaluation processes.

Programme participants include programme beneficiaries and community members that we work with or come into contact with through our programmes/operations.

Internal complaints are valid complaints made by a person involved in, benefitting from or affected by Vita's operations.

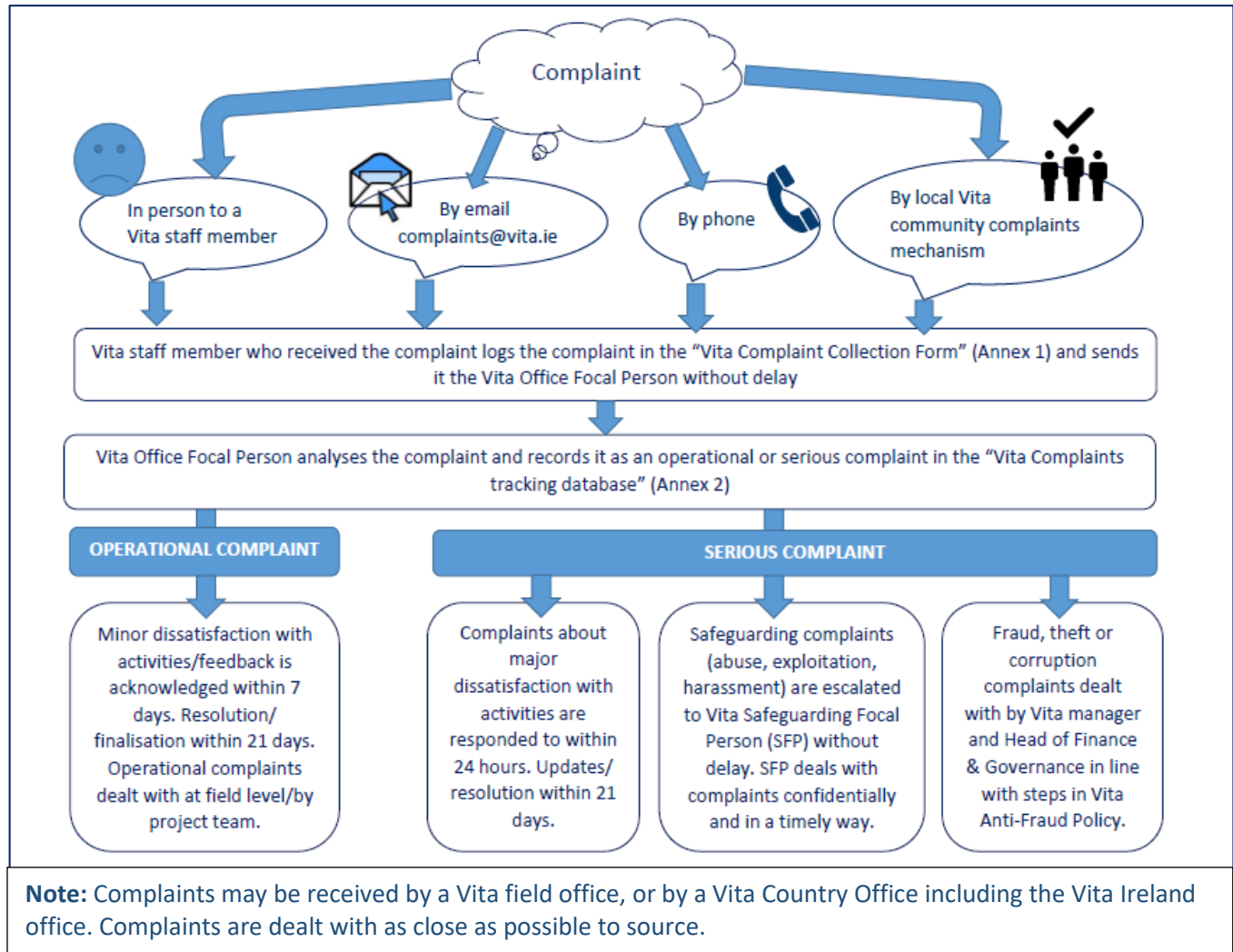
External complaints are valid complaints made by a member of the public not involved in or benefitting from Vita's operations.

Who can make a complaint?

- Vita programme participants
- Non-programme participants within the area where Vita works
- Vita staff, affiliates, and partners
- Other individuals and stakeholders affected by Vita's work
- Disclosures can also be received from internal audits or external audits

How to make a complaint?

Complaints can be made directly to Vita through the following channels:



- All complaints and constructive feedback will be **taken seriously** whether submitted by a named source or anonymously.
- All complaints will be **handled swiftly** so far as reasonably practicable depending on the nature and complexity of the matter.
- Vita will ensure that **confidentiality** is maintained when handling complaints. Vita will protect the personal information of the complainant, the party accused and the victim/survivor (if any) as appropriate. Complaint information will only be shared on a "need to know" basis. The best interests of the survivor (if any) will be prioritised.
- Issues of conflict of interest will be identified to ensure **objectivity**.
- Complaints will be handled in accordance with Vita policies and procedures and in accordance with local laws and regulations.

How Vita deals with complaints – see Table 1

Vita deals with operational complaints and serious complaints in different ways. Please see Table 1 below for the seven categories of complaints and the Vita staff member responsible for dealing with complaints, and the timeframe in which Vita will respond to complaints and take appropriate action.

Table 1: The type of complaints, and timeframe to provide the responses

Categories	Category of complaint	Vita staff handling complaint should refer to	Vita staff member who deals with complaint and complaint response	Duration or timeframe to provide responses
1. Request for information	Operational complaints	Complaints Policy	Vita Office Focal Person and relevant manager*	Acknowledgement within 7 days, with resolution/ finalisation within 21 days
2. Request for assistance				
3. Feedback				
4. Minor dissatisfaction with activities				
5. Major dissatisfaction with activities	Serious complaints	Complaints Policy	Vita Office Focal Person, Vita CEO, Vita Country Director	Response within 24 hours of being aware of event, with updates/resolution within 21 days
6. Abuse, exploitation and/or harm including sexual abuse, sexual exploitation, physical abuse, emotional/psychological abuse or harassment		Safeguarding and Dignity at Work Policies	Safeguarding Focal Person, Vita CEO, Vita Country Director	
7. Fraud, theft, corruption		Anti-Fraud and Anti-Corruption Policy	Head of Finance, Vita CEO, Vita Country Director	
* Manager is assigned by the Vita Office Focal Person				
The difference between major and minor dissatisfaction is that major dissatisfaction causes immediate harm to the beneficiary and needs urgent attention. Minor dissatisfaction is also important but not seriously damaging to the person/persons affected.				

Vita Complaints Procedure

1. Upon receipt of a complaint, it will be recorded on the appropriate form by the relevant Vita staff member.
2. The form with the complaint/s will be sent to the Vita Office Focal Person
3. The Vita Office Focal Person will enter the complaint in the Complaints database – Annex 2 - and will classify it as Serious or Operational.
4. All complaints and disclosures related to a safeguarding incident (Category 6) are considered serious. Any suspicion, concern, allegation or disclosure of any form of abuse must be highlighted in case they are indicators of a wider systemic risk. Any complaint about abuse/exploitation will be dealt with through procedures in the Vita Child and Vulnerable Adult Safeguarding Policy. Complaints about abuse, exploitation or any form of sexual misconduct will be escalated immediately to the Vita Safeguarding Focal Person at national level (Country Head Office and then to Dublin Office).
5. If the complaint is of a serious nature, and not covered under the Safeguarding Policy, Vita will follow the Serious Wrongdoing Reporting steps outlined in the [Anti-Fraud and Anti-Corruption Policy](#)². This includes ANY allegation of fraud, theft, or corruption, irrespective of its scale.
6. The Vita CEO and/or the relevant Country Director are informed of all serious complaints and updated about the complaint response taken.
7. Country Directors, Dublin management, Directors and the Chair of the Board at the governance level, depending upon the nature and level of complaints will be the key people to receive external complaints.
8. Operational Complaints will be dealt with as close as possible to their source.
9. **Category 5** major dissatisfaction complaints are also considered important, but should be dealt with in the first instance by complaints handling procedures of the Vita national office where the major dissatisfaction complaint is made i.e. the relevant Vita Country Office or the Vita Ireland office. During an investigation, it may be necessary to re-categorise a complaint to a Category 6 or 7. If this happens, the complaint is re-classified and should be escalated to the Dublin Office as per Vita's complaints procedure.

Vita has a duty to report any suspected criminal activity to the relevant legal authorities, including if a person/persons has been harmed or are at continued risk of harm or abuse.

All complaints will be recorded on a centralized database held in the Dublin office. The database is managed by the Vita Office Focal Person in the Dublin office. This includes strict management of access to the details of complaints held in the database and analysis of complaints.

A report will be available each quarter to advise management and the Board of the status of complaints, the turnaround, outstanding complaints at end of each quarter and the lessons learned/amendments to procedures recommended and effected because of a complaint – see Annex 2.

² <https://vitaimpact.org/wp-content/uploads/2022/04/Vita-Fraud-Policy-July-2021-Approved.pdf>

Developing Community Complaints Response Mechanisms in Vita

Accountability and **Community-Centred Development** are two of Vita's guiding principles (Vita Strategy 2021 – 2025). Having an accessible, effective community complaints response mechanism (CRM) is a key part of putting these principles into practice.

Pillars of Vita Community Complaints Response Mechanism (CRM)

For a community CRM to be effective it must incorporate the following principles (CAST):

- **Confidentiality:** Community members and all other potential complainants have a right to expect that their privacy will be respected, and that their complaint will be investigated in a confidential manner.
- **Accessibility:** Community members will be given a range of CRM contact options which may include a complaints box, a dedicated phone line, email address, face to face meetings, or community meetings as appropriate to the local context.
- **Safety:** It is crucial to look at the local context (general safety, political, cultural aspects) and conduct a risk assessment. The safety of the specific person who complains is an essential component in the mechanism.
- **Transparency:** Details on how the complaint will be handled, by whom, who it may be referred to and the response timeframe should be given to the complainant.

Mechanisms for feedback and complaints

Any CRM must be tailored to the local context, the organisational structure in-country and be suitable for the Vita programme country/location and the programme participants. Mechanisms should be designed and implemented in consultation with communities. Following this, the process for making a complaint must be made clear to programme participants and other programme stakeholders.

When designing and implementing the CRM, Vita will inform programme participants/community stakeholders of the high standard of behaviour that is expected of Vita staff and all other Vita representatives at work and when interacting with community members.

Complaints only:

- **Face to face:** Reporting to a Vita office, staff member, etc.
- **Email:** Where possible, Vita will assign a dedicated email address for receiving complaints.
- **Functional Traditional and Community-Based Feedback and Complaints Response Mechanisms:** Traditional feedback and conflict resolution mechanisms can be assessed and used as part of complaints response mechanisms.
- **Dedicated Phone Line Number:** Where possible, Vita will assign a dedicated mobile phone line number for receiving complaints. Ideally this dedicated mobile phone number should be free to call so a phone charge does not act as a barrier making a valid complaint. This phone number will be actively promoted and made publicly available at all offices and operational sites. An SMS option should be considered as part of dedicated phone line.

- **Complaints boxes for community complaints:** Complaint boxes should be in a place that is accessible to all community members but also allows for complaints to be made and collected discreetly. The box should be locked to maintain confidentiality of complainants and build trust in the mechanism. The location of the complaints box should be advertised to community members. The community complaints boxes should be checked regularly so that complaints can be collected and processed in a timely manner.
- **Field-level collection of community complaints:** Complaints may arise in the course of Vita's routine operations in the field. Vita field staff should record any complaints they receive in the Vita Complaints Collection Format (Annex 1). Vita Country Offices may wish to appoint a designated Vita field staff member that communities can make verbal complaints to. Ideally, this designated staff member should be known and trusted by Vita programme participants and should be located close to Vita programme/project operations. They would also use the Vita Complaints Collection Format (Annex 1) to record all complaints. Field staff who receive and log a complaint should send the complaint details to Vita Office Focal Person as per the Vita Complaints Procedure Steps. Responses that can be addressed at field level will be taken as soon as possible.

Feedback:

Vita has established robust participatory monitoring and evaluation processes within all of its operations where feedback on the performance and quality of our work is systematically sought and internalized. These include:

- **Community meetings:** Feedback from stakeholders can be collected during needs assessments, community sensitisation, trainings, workshops, during distribution of inputs (crop seeds, farm tools, hygiene, and sanitation products etc.), monitoring of interventions, quarterly and bi-annual review meetings, closure session and evaluation through wider community meetings.
- **Focus Group Discussion with programme participants**
- **Individual house to house visits**
- **Monitoring visits:** Vita's staff regular monitoring field visits are used to collect feedback.
- **Field monitoring after distribution of goods or delivery of services**
- **External evaluations** of Vita programmes are an opportunity for collecting objective feedback

Annex 1: Vita Complaints Collection Format

S/N	Location	Date	Name of participant	Complaint received	Action taken at field level (Y/N)	Date of action taken	By whom	Summary of action taken *

*This action could be referral to Country Head Office or Dublin Office, or a description of the action taken at field level if handled at field level.

Annex 2: Vita Complaints Tracking Database

Date	Location	Ref. to personal details of complainant	Summary detail and file name of the detailed complaint	Category (1-7)	Who received the complaint	Summary of action taken	Outcome	Follow up required: Yes/No & by Whom	Feedback given – Yes/no & by whom & when	Appeal Yes/No	Feedback given	Change in processes required	Case closed Yes/No Date

Note: Category 6 – re Safeguarding issues tracked separately under the Safeguarding Policy reporting framework.

Annex 3: Cover letter for Vita Board (not part of the policy text)

Date: October 2021
Subject: Vita Complaints Policy
Purpose: Submitted for approval
Submitted by: Neil Munday

Vita Complaints Policy and Procedures

The purpose of this document is to set out steps to be implemented in receiving and responding to feedback and complaints from the people we work with.

This Policy outlines the type of complaints that Vita responds to, including misconduct of:

- Vita Board member/s;
- all Vita employees, including affiliate organisations;
- all paid and unpaid consultants, contractors, interns, secondees and volunteers who provide supplies, services, or support to Vita or promote its work at any location in or outside of Ireland;
- Vita's partners, vendors and other third parties, who are included or referenced in relevant bid or tender documents, agreements, memoranda, purchase orders or contracts.

Associated policies and procedures

The Vita Complaints Policy is linked to and must be read in conjunction with:

- Protected Disclosures (Whistleblowing) Policy
- Child and Vulnerable Adult Safeguarding Policy and Vita Behaviour Code contained within the Safeguarding Policy
- Conflict of Interest Policy
- Anti-Fraud and Anti-Corruption Policy
- Human Resources Manual.

Vita reserves the right to report any suspected criminal activity to the relevant legal authorities.
Version Control.

Version no.:	Date	By (Name, Position)	Details of changes	Reviewed and approved by: (name and position)
1	Jan 2018	Kevin Gregory, Head of Finance	n/a	
2	Oct 2021	Emily Hosford (Programme Officer), Neil Munday (HoF&G)	Redrafted	PC Nov 2021 Board 08/12/2021

