



POLICY ON COMMUNITY FEEDBACK MECHANISMS (CFM)

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1. Introduction, purpose, and scope

This policy sets out principles and minimum standards to establish and run formal community feedback mechanisms to allow communities we work with and relevant stakeholders, both local and national, to provide feedback and issue complaints about Oxfam and partner projects and performance, and for Oxfam and partners to address such feedback and complaints in a safe and responsive manner.

Oxfam is committed to accountability and transparency in all activities. This Policy is framed within that commitment along with internal and external quality and accountability approaches and initiatives, like Oxfam's feminist, safe programming, and community engagement approaches¹. This Policy is complementary to other Oxfam Governing Documents. It is to be read jointly with Oxfam's *Code of Conduct, Safeguarding policies - Protection from Sexual Exploitation, Abuse & Harassment, and Child Safeguarding, Responsible Program Data Policy, and Anti-Corruption Policy*.

Policy Statement

Oxfam considers Community Feedback Mechanisms (CFM) to be a key element for effective programming and accountability. All programs, development, humanitarian, and influencing, with direct contact with communities, must set up and manage a CFM that is in line with the principles and minimum standards indicated in this policy. CFMs will be seen as effective if, at minimum, they meet the following: they support the collection, acknowledgement, analysis and response to the feedback received, thus forming a closed feedback loop.

Purpose

Receiving feedback/complaints and responding to them is a fundamental part of improving Oxfam's accountability. Oxfam establishes effective feedback mechanism to:

- create trust between Oxfam and its stakeholders and fulfil Oxfam's responsibilities toward project participants, donors, the NGO sector, and society at large
- constitute an early warning mechanism to uncover hidden patterns
- give a voice to communities Oxfam serves
- protect Oxfam's reputation
- save money by detecting gaps in programming and misappropriation of inefficient systems

Scope

Any communities we work with, and other relevant stakeholders, local or national, as a group or an individual, can give feedback or make a complaint using the Community Feedback Mechanism.

What is covered by this Policy? Programme/Project related concerns about what we do and how we do our work, e.g., quality or quantity of deliverables, safety, and security of communities to participate in programming, or how participants are selected. Feedback and complaints are welcomed on the actions and decisions taken by Oxfam staff, its partners, contractors, interns, enumerators, volunteers, and suppliers in relation to Oxfam target communities (in particular, but not exclusively, people directly participating in Oxfam's programming.)

What is not covered by this policy? Complaints from or about Oxfam staff are not covered by the CFM; they are governed by Oxfam's procedures for dealing with issues in the workplace. Complaints relating to serious incidents such as fraud and corruption or safeguarding concerns will be dealt with through the relevant policy and procedures, i.e. Anti-corruption Policy, Safeguarding policies - Protection from Sexual Exploitation, Abuse & Harassment, and Child Safeguarding. Oxfam has SOPs for Reporting Misconduct which outlines how any of the above should be reported, which can be found on Compass.

¹ Oxfam is certified against the Core Humanitarian Standard and its Nine Commitments and Quality Criteria, particularly commitments and criteria numbers four and five:

Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decision that affect them – humanitarian response is based on communication, participation and feedback.
Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints – Complaints are welcomed and addressed.

Implementing partners: Oxfam and partners must work together to ensure there is a CFM that adheres to the principles indicated in this policy, and to ensure that partners have CFM guidelines that provide more detailed, context specific, procedures that incorporate the principles outlined in this policy. The minimum standards for CFM in this document are applicable to Oxfam only, though partners are encouraged to work towards them.

Consortia/Joint Mechanisms: Where Oxfam works with other agencies in consortia, joint mechanisms should be considered by the lead agency, which Oxfam should participate in, while still meeting the minimum standards outlined in this policy. If Oxfam is the lead agency, we should expect the principles of this policy to be adhered to by the other consortium members, within the scope of their own policies/standards/practices. How a joint mechanism, or individual agency mechanisms work within a consortium must be discussed and agreed by the members.

Feedback and complaints not concerning Oxfam or partners: Oxfam and partners staff must attempt to refer any feedback or complaints on actions reportedly undertaken by other stakeholders to those stakeholders, as long as there is consent from the complainant and/or there is no risk to the complainant in doing so. If a coordinated referral mechanism is not in place and Oxfam or partners receive a sensitive complaint (e.g., SEAH or corruption case), a senior staff member (e.g., Safeguarding or Fraud) should be consulted regarding further steps.

Term	Definition		
Accountability	The process of using power responsibly, taking account of, and being held accountable by, different stakeholders, and primarily those who are affected by the exercise of such power ² .		
Feedback	Feedback is a comment or concern that can be positive or negative but does not always require a formal response. Feedback provides useful insights into how projects are implemented. Feedback can be addressed informally during programme monitoring visits or can be referred to management staff if relevant/necessary.		
Complainant	This Policy refers to a complainant as the individual, group, or legal entity, external to Oxfam, that has issued a complaint to Oxfam. A complainant can act on its own behalf or on behalf of a third person or party.		
Complaint	A complaint is an expression of dissatisfaction or unacceptability about the standards of service, actions, or lack of action, by Oxfam or Partner staff and associated personnel. It is a criticism that expects a reply and would like changes to be made.		
Community Feedback Mechanism	A Community Feedback Mechanism (CFM) is the established process through which Oxfam and/or its partners receives, addresses, and responds to feedback and complaints provided by any external stakeholder.		
Acronyms			
CFM	Community Feedback Mechanisms	PQ	Program Quality
MEAL	Monitoring, Evaluation, Accountability and Learning	PSEA	Protection from Sexual Exploitation and Abuse
SEAH	Sexual Exploitation, Abuse, Harassment	SOPs	Standard Operating Procedures.

2. Policy rules

2.1. Principles for an effective Community Feedback Mechanism

Oxfam and partners must establish a CFM which incorporates the following principles:

2.1.1 Context-specific: The CFM must be appropriate to the local context, with consideration given to social, cultural and gender norms that may affect reporting of feedback and complaints. It is vital to select the channels³ for accepting and responding to feedback in consultation with the people

² Core Humanitarian Standard

³ CFM channels are the ways people can give their feedback. E.g. hotlines, suggestion boxes, community meetings, email, help desks etc

who will use them, in the languages that they use. This will increase the community ownership of the CFM, which is essential to ensure its practicality and use.

2.1.2 Accessible: The CFM must be safe, easy-to-use, respectful, and reachable for all concerned people, i.e., regardless of gender, age, disability, poverty level, or any other intersectionality of diversity that may temporarily or structurally diminish a person's ability to raise complaints and seek redress. Barriers to raising concerns - whether these are physical, cultural, rooted in fear, or a lack of awareness regarding the mechanism and the right to use it - must be identified and mitigated. The CFM must include both collective (e.g., community meetings) and confidential channels (e.g., phone line).

2.1.3 Confidential: To ensure confidentiality, we must restrict access to, and dissemination of, personal identifying information connected with a complaint or feedback. This requires information to be available only to a limited number of authorised people for performing the necessary steps resulting from the complaint. Information must be recorded and stored responsibly or in line with any data protection obligations or laws which apply⁴.

2.1.4 Safe: The CFM must not inadvertently expose people giving feedback/complaints to protection threats or exacerbate vulnerabilities to those threats. When necessary, people must be given the chance to make an informed decision on whether to continue or discontinue the feedback/complaints process. This must be based on sufficient information regarding potential risks associated with the process.

2.1.5 Independent: The CFM must ensure that channels to collect feedback and complaints, as well as the process to address them, effectively avoid real or perceived conflicts of interest. In the event of a complainant being dissatisfied with the way their feedback is handled, or if the complaint is about the person receiving feedback/managing the CFM a more senior member of staff should take over the management of the issue.

2.1.6 Transparent: Communities and stakeholders must know that the CFM exists and have sufficient information on how to access it, how their issue will be managed, and how their information will be used. The people whom it concerns should be able to speak to Oxfam and partner staff regularly about the operation of the feedback mechanism. If requested, the feedback provider can know who is responsible for handling their issue and communicating outcomes back from Oxfam or partners

2.1.7 Timely: Complaints/feedback must be handled swiftly. Concrete classification of timely action depends upon the nature and complexity of the matter, and local conditions. Oxfam and partners must decide these timeframes when establishing the CFM, paying specific attention to issues categorised as major dissatisfaction.

2.1.8 Closing the feedback loop: Measures taken because of the feedback being raised must be communicated back to those who shared the feedback/complaint in the first instance. Though it is difficult to provide responses back to anonymous complainants, attempts should be made to do so. Providing fair and consistent communication will help strengthen the credibility of the CFM.

2.2. Minimum Standards in Oxfam programmes for a Community Feedback Mechanism

Oxfam programmes must have a Community Feedback Mechanisms which meets the principles outlined in section 2.1 as well as meeting the following minimum standards:

2.2.1 Existence of a CFM, Clarity of Purpose and Process: All programmes, including those implemented remotely or by partners, must have a functioning CFM with clear guidelines designed to comply with this Policy, set up jointly within our partnerships where relevant. Based on the nature of the programming, the CFM must be established as quickly as possible, and its closure should be incorporated into exit planning.

2.2.2. Allocation of Resources: All offices must allocate sufficient financial and human resources to meet the requirements of this policy in a timely manner, or to support partners to achieve the principles. There must be at least one staff member in every Oxfam Country Office responsible for supporting the implementation of a CFM.

2.2.3. Context Driven and Collaborative Design: Communities we work with must have input into the design of the CFM to ensure it is appropriate and effective at all stages of its operation, for all

⁴ E.g. Oxfam's responsible data protection policy and information security policy, or GDPR

members of communities regardless of sex, age, ability etc.⁵. A risk assessment, including power dynamics within communities, must be conducted on the CFM.

2.2.4. Staff awareness and engagement: All Oxfam and partner staff, regardless of role or seniority, must be aware of the existence and purpose of the CFM and can pass on information about the CFM process and channels when required. All Oxfam staff understand that welcoming and handling feedback and complaints is part of Oxfam’s core business.

2.2.5. Information Provision and Expectation Setting: Accurate and clear messages about this policy and the CFM (instructions for using feedback channels, including child-friendly channels and description of the feedback/complaints handling process), are disseminated among all relevant stakeholders particularly targeting the communities Oxfam and partners work with. Community preferences for receiving information are identified to ensure messages are understood, and that community expectations of what the CFM can achieve are managed.

2.2.6. Appropriate CFM channels: Channels to capture both solicited and unsolicited feedback/complaints must be designed in a contextually and culturally appropriate manner. Country Programs must maintain accessible and confidential feedback and complaints channels which include at least one written and one verbal channel of communication to ensure all levels of literacy are catered for. Women must have a suitable channel to reach a female staff member.

2.2.7. Feedback is acknowledged, registered, and responded to: All complaints and feedback received must be acknowledged, registered, and categorised according to the four global categories in a feedback/complaint register, along with actions taken to address them. The four global categories for feedback/complaints are Positive Feedback, Requests for Assistance, Minor Dissatisfaction, Major Dissatisfaction. Data in this register must be disaggregated by age, gender, and other relevant categories. The principle of confidentiality (section 2.1.3) must be applied when receiving and handling complaints and their related data.

2.2.8. Child-friendly: Projects which specifically target children must establish child-friendly channels for children to provide feedback/complaints about the programme. Information about the CFM must be tailored for children and their guardians. The CFM must ensure that children are not exposed to further violence, harm, or exploitation because they provide complaints and/or feedback.

2.2.9. Analysis and reporting: Feedback must be disaggregated and analysed regularly, considering intersectionality, to identify positive and negative trends and provided to management to inform decision making. Programme teams must create space to reflect and decide how to respond to programme feedback and analyse feedback/complaint trends, involving partners where relevant. A summary of feedback received (and answers given/changes made) should be included in relevant programme/donor reports.

2.2.10. Learning and adaptation: CFM guidelines, channels, and Standard Operating Procedures (SOPs) must be reviewed after 18 months to adapt to lessons learned and best practices collected during its implementation and in line with strategy development process. Oxfam and partner staff must be involved in the learning and adaptation of the CFM.

2.3. Oversight

Governance over this policy, and oversight of compliance with it, will be exercised by Regional Directors who are expected to hold Country Directors accountable for the existence and effectiveness of a CFM in all Country Offices.

3. Roles and responsibilities

Role	Responsibility
Senior management / Country Director	Management are responsible for ensuring procedures resulting from this policy are established in accordance with the principles and minimum standards outlined. Managers must promote the CFM and show ownership of the principles stated in this policy. The CD has the ultimate responsibility for the proper functionality of the CFM.

⁵ In situations of remote management or in hard-to-reach areas, community participation can be sought through Community Based Organisations, local NGOs or other representatives of the communities, on Oxfam’s behalf.

Program Quality/MEAL staff:	PQ/MEAL staff coordinate monitoring and technical support to ensure that the CFM is functioning, program staff are regularly communicating about the CFM and closing the feedback loop, and regular analysis is undertaken and shared.
CFM focal point/s:	Staff designated to receive, record, and forward or handle feedback and complaints. A CFM focal point will manage the feedback and complaints register, ensure that programme teams receive the feedback/complaints relevant to them, and that the feedback loop is closed in their agreed timeframes. The CFM focal point will lead analysis of feedback data and provide reports to management on this data. The CFM focal point/s role may either be a dedicated position, or form part of a staff member's responsibilities (depending on the size of the programme/funding availability) and should ideally be situated in the Program Quality/MEAL team.
Programme / staff:	Programme staff (with support of MEAL and Safeguarding staff) are responsible for sharing information with communities about what and how they can give feedback or make complaints. All staff who come into contact with communities we work with are responsible for collecting and documenting any feedback they receive (whether it relates to their own work or another team's), share the feedback to the CFM focal point, provide the timely response to any feedback forwarded on by the CFM focal point, as well as adjusting programme activities based on feedback where appropriate.
Safeguarding Staff/Focal Points:	It is the responsibility of Safeguarding staff or Safeguarding focal points to ensure staff responsible for the CFM understand what to do with sensitive disclosures they may receive through the CFM, regularly coordinate with PQ/MEAL and program staff to ensure information is appropriately shared with communities about the CFM and safeguarding reporting systems.
Oxfam Partnership staff/focal point and Partners:	All Oxfam programs work jointly with partners to establish robust CFMs and report to Oxfam regularly on complaints statistics (if linked to Oxfam-funded project activities) and other relevant information. Oxfam also expects that, where Oxfam is the grant holder, partners have the capacity to implement CFM and report to Oxfam regularly. Oxfam offices should implement capacity building initiatives to assist implementing partners to meet the CFM principles. Partnership staff/focal points are responsible for working with partners to form the most appropriate connections between Oxfam staff and partners to ensure CFMs are established and operated in line with this Policy, whether that is done jointly or individually. If the partner is unable to have CFM in place, Oxfam will strive to ensure that the communities with whom the partner comes into contact with during implementation of the project will have access to the Oxfam CFM or to an alternative system for reporting. Oxfam and the partner must decide how they will discuss and manage feedback received by either party.

4. Related documents

This Policy is complementary to other Oxfam Governing Documents. It is to be read jointly with Oxfam's Code of Conduct, Safeguarding policies - Protection from Sexual Exploitation, Abuse & Harassment, and Child Safeguarding, Responsible Program Data Policy, and Anti-Corruption Policy.

5. Version control

This policy will be reviewed and updated every 4 years or earlier as required to comply with legislation or external and internal changes. Existing policies that need to be reviewed, must comply with this Policy on Organisational Policies.

Version	Approved by	Approval date	What has changed
1	Executive Leadership Team	[25/05/2022]	N/A