

THE ACCOUNTABILITY TO AFFECTED POPULATIONS (AAP)

MANIFESTO

*Strengthening Accountability through
Communication and Community Engagement*



Communication with Communities Working Group

Cox's Bazar, Bangladesh

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*This Manifesto outlines the **Communication with Communities Working Group's (CwC WG)** broad strategy and operational directions towards promoting and strengthening Accountability to Affected Population in the Rohingya Refugee Response, Cox's Bazar, Bangladesh.*

It is drawn up within the Accountability sub-group¹ under CwC Working Group and with further consultation with members of the group as well as with a range of other stakeholders including sectors, working groups, UN, INGO, NGOs etc. As an operational guideline, it is a living document, intended to be regularly updated as the situation evolves.

¹ The Accountability sub-Group within the CwC WG was established to respond to the gaps and challenges of achieving mandated accountability standards. It first met in mid-February 2018 and led by Internews; where this 'Accountability Manifesto' was drafted in late February 2018.

BACKGROUND

Since August 2017, an estimated 738,196 Rohingya refugees have arrived in Bangladesh's Cox's Bazar District from Myanmar, fleeing a military crackdown in Myanmar's Rakhine state that has been characterised by widespread reports of violence against civilians and crimes against humanity. The most recent influx of refugees follows earlier waves of displacement of Rohingya refugees from Myanmar in October 2016, 1991-1992, and 1978, and brings the total number of Rohingya refugees in Bangladesh to 906,572².

Most of the newly-arrived refugees rely on humanitarian assistance, having fled with few possessions and exhausted their financial resources during the journey. Moreover, refugees are fleeing a context of long-term social and economic marginalisation in their areas of origin in northern Rakhine state, where, stripped of citizenship, they have been denied freedom of movement and systematically excluded from access to education, healthcare and livelihood opportunities. Many new arrivals have settled in hilly, formerly forested areas that are highly vulnerable to landslides and flash-flooding in monsoon season, while the entirety of Cox's Bazar District is exposed to frequent and sometimes severe cyclones. The rapid speed and enormous scale of the refugee influx have also placed a significant strain on resources, infrastructure, public services and the local economy in what is already one of the more socially deprived areas of Bangladesh.

NEEDS ANALYSIS

In the first quarter of 2018, the Rohingya response in Bangladesh was generally failing to achieve mandated accountability standards (Christian Aid 2018³ and Internews 2018⁴). According to the Christian Aid (CAID) survey, only 16% of women and 25% of men were aware of accountability mechanisms, while only 27% of women and 17% of men report understanding their rights related to humanitarian assistance. In the early days of the emergency, organisations tended to rely on complaints boxes and telephone Hotlines as standard complaint and feedback mechanisms organisations; due to low literacy levels and phone access restrictions, accessibility was low.

Over time, amongst agencies, there is an increasing sense of the importance of accountability, with different approaches emerging. Static and mobile Information Hubs, Information Desks and Help Desks were being established and increasing in number, placed in strategic locations across the camps in efforts to ensure coverage⁵. Despite a high number of agencies collecting feedback (Internews 2018), meta-data is not systematically collected on complaints received. It was also observed that despite the high percentage of agencies that say they are collecting feedback, this is mostly being done on an individual agency-basis and there is little shared analysis.

This highlights the need for improved coordination, such as establishing referral pathways for individual case-based complaints and ensuring data feeds into meta-analysis that informs response-wide interventions and advocacy. Moreover, not all recipients of feedback and complaints have staff trained in handling and referral of sensitive complaints including gender-based violence (GBV) and protection against sexual exploitation and abuse (PSEA). Complaints data stored by a variety of humanitarian actors has varying levels of data protection, with unencrypted emails and storage devices. Formal and systematised referral mechanisms for individual case-based complaints between project or agency-specific complaints mechanisms and multi-sectoral mechanisms are not in place.

² UNHCR. Bangladesh Refugee Emergency Population Factsheet, Cox's Bazar, 31 December 2018.

³ Christian Aid (CAID) Accountability Assessment Rohingya Response Bangladesh: data collection for this report was conducted in January, 2018, and the report was written in February, 2018 where the report is a joint production by Christian Aid and Gana Unnayan Kendra (GUK)

⁴ Humanitarian Feedback Mechanisms in the Rohingya Response: Cox's Bazar, Bangladesh, June 2018

⁵ The CwC WG through 4W reporting and mapping exercise have compiled a list and locations of Information Points and Hubs managed by CwC WG member agencies

Focus Group Discussions (FGDs) and surveys have been conducted, but more tailored toward needs assessment and Monitoring and Evaluation (M&E)-hence a need to utilize these platforms for accountability activities such as information dissemination and feedback sharing. In the meantime, community committees including sectoral committees are being established across locations, with efforts underway to improve community participation and establish more representative governance mechanisms, to facilitate feedback and response to community concerns.

According to a survey conducted by Ground Truth Solutions (GTS) published in December 2018⁶, 52 % of the respondent indicated that they knew how to make suggestions and complaints. Nevertheless, only 46% have actually filed a complaint, with some 77% expressing satisfaction with the response they received. While most respondents feel informed about the kind of aid available to them, one third of the responders were either unsure or do not believe that their opinions are taken into account by aid providers. Among those who do not feel listened to, there is a general sense that they are either not asked for their opinion, or that aid providers only solicit the opinions of Majhis. Given this perception, findings suggest that the preferred channels for both men and women are community representatives (Imam, Majhi, or religious leader) with 73% believing that Majhis represented the views of everyone the community equally.

Priority Needs

Humanitarian actors should strengthen mechanisms and avenues to informing affected populations of their rights related to humanitarian assistance, which is an essential precursor to improving accountability. There are distinct gender differences in attitudes and practices related to accountability that must also be understood and addressed; although there appeared to be no major difference in responses between men and women in the latest round of data collected by GTS in October 2018, there are concerns about how the most marginalised women feel, notably those who may not even leave their shelters. Thus, top priority in complaints and feedback is raising the awareness of the community on the available feedback mechanisms and linking the community to the mechanisms. Preference remains overwhelmingly for vocal and face-to-face mechanisms that reduce barriers, such as illiteracy.

In addition, complaints and feedback should not only be collected, but responded to in the least possible time. Strengthening referral pathways and effective coordination ensure reasonable turnaround time for feedback received. Communities in turn develop confidence in the systems and uptake of the mechanisms is anticipated to increase. Having multiple complaints and feedback systems ensures that a wider population is reached including the woman, girls, the aged and those living with disability. These vulnerable groups should be considered in the design of a complaints and feedback system and consulted so that the systems are tailored to meet their needs.

Rolling out comprehensive complaints and feedback system can only be effective if the capacity of humanitarian staff is built to ensure that there is a common understanding on the Core Humanitarian Standards. Along with improving access to information and accountability mechanisms, attention must also be paid towards facilitation of more equitable community participation and governance mechanisms.

⁶ Ground Truth Solutions Cox's Bazar Bulletin, Feedback and Relationships. The survey was carried out in October 2018.

CORE ACCOUNTABILITY STANDARDS

The importance of accountability is articulated and agreed upon in the Transformative Agenda⁷, Grand Bargain⁸ and Core Humanitarian Standards (CHS)⁹ amongst other documents. Specifically, the standards express the following key accountability “commitments and quality criteria:

- **CHS Four:** Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them;
- **CHS Five:** Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints;
- **CHS Seven:** Communities and people affected by crisis can expect delivery of improved assistance as organisations learn from experience and reflection.

ACCOUNTABILITY VISIONS

Based on the above core humanitarian standards and guideline on accountability, the Accountability Manifesto envisages the following Outcomes:

1. ***Affected populations have a clear understanding of their rights related to humanitarian assistance, and accessible mechanisms in their own language, through which they provide feedback and/or complaints.***
2. ***Humanitarian actors coordinate to ensure that feedback and/or complaints are responded to and complainants are informed of action/response taken.***
3. ***The feedback and trends underpin evidence-based advocacy that puts the voices of affected populations in the foreground of the humanitarian response and programme design.***

STRATEGY TOWARDS A COMMON ACCOUNTABILITY MECHANISM

As an overarching strategy, the 2019 Joint Response Plan (JRP) of the Inter-sector Coordination Group (ISCG) incorporates a **Protection Framework** as the core of this response and emphasized on need to involve the community in all stages of response. The **Strategic Objectives (SO)** of the JRP 2019 are as follows:

SO1	Collectively deliver protection to refugee women, men, girls and boys. <i>Empower individuals and communities, and ensure that all aspects of the response contribute to an enabling environment for the rights and well-being of affected populations.</i>
SO2	Provide life-saving assistance to affected populations. <i>Improve quality and rationalize services to ensure equal access for women, men, boys and girls, mainstream disaster risk reduction and ensure preparedness for natural disaster.</i>
SO3	Foster social cohesion. <i>Stabilize and sustain the response in close collaboration with the Government of Bangladesh, by ensuring equitable access to quality services for affected populations, building resilience and strengthening capacities, and rehabilitating the environment and eco-systems.</i>

⁷ The “**Transformative Agenda**” (TA) is an initiative undertaken within the Inter-Agency Standing Committee (IASC) since December 2010 to improve the humanitarian reform process, which in 2005 introduced the clusters, established new financing mechanisms, and made an attempt to strengthen humanitarian

⁸ The ‘Grand Bargain’ is an agreement between the biggest donors and humanitarian aid organizations. It aims to get more means into the hands of people in need and to improve the effectiveness and efficiency of humanitarian action. To that end, it sets out 51 commitments distilled in 10 thematic work streams

⁹ The Core Humanitarian Standard on Quality and Accountability sets out nine commitments for humanitarian and development actors to measure and improve the quality and effectiveness of their assistance. The CHS places communities and people affected by crisis at the centre of humanitarian action.

The JRP 2019 Strategy of ISCG and CwC WG:

The JRP 2019 of Communication with Communities Working Group (CwC WG) places further emphasis on accountability by strengthening Feedback and Accountability Systems.

The three objectives as set out in the CwC WG's JRP 2019 are:

- 1. Strengthen coordination and advocacy towards the integration and reinforcement of Communication with Communities capacities and community engagement to ensure comprehensive¹ accessibility to life-saving information and knowledge on rights and available resources by affected populations, across sectors.*
- 2. Establish and reinforce needs-based, actionable, two-way and culturally appropriate multi-sectoral communication resources and strengthen dissemination and access to information.*
- 3. Strengthen participation of, and accountability to affected populations through effective community engagement, participatory approaches and functional feedback and complaint response mechanisms.**

Building on existing capacity on feedback and accountability mechanisms, CwC WG will focus on establishing a standardized process by operationalizing CwC Accountability Manifesto, a guiding document outlining CwC approach and action plans towards accountability. The main objective will remain to ensure accurate and timely information is provided to and feedback collected from both refugee and local communities using multiple channels and subsequently effective resolution of the received feedback/complaints by the respective agencies. Ensuring an effective feedback and accountability system is a shared responsibility of all stakeholders. Each individual entity has their own stake as well as responsibility:

- Each humanitarian agency has a responsibility to ensure its programming is accountable to the communities it serves; in that the affected population has **equitable access to clear and accurate information**; is able to **safely raise concerns, make complaints, give feedback, and receive responses**; and **meaningfully participate in the full programme cycle from design to implementation**;*
- Each humanitarian agency has a responsibility to refer, with complainant consent, complaints they receive that relate to other actors, and to receive from other actors the complaints relating to their operations; and*
- In a response setting with many service providers, multi-sectoral mechanisms should be established in which community members can raise concerns and receive responses on an individual basis and/or through community representatives. These responsibilities cover all members of affected populations, including those of varying voice and visibility due to differences in age, sex, gender, ethnicity, disability, religion and other diversity.*

Accountability to affected populations must therefore be ensured through a variety of mechanisms. These range from the regular, informal face-to-face interactions of staff with affected populations through outreach workers or community mobilisers, to the establishment and use of community participation and governance structures, including sectoral committees and community leadership, and to the establishment of dedicated complaints and feedback mechanisms. Apart from a focus on women, **specialised and adapted tools¹⁰ should be utilised when addressing accountability to children, to ensure humanitarian programming reflects the feedback, experiences and views of children as well as address child-safeguarding and other serious issues in a timely and effective manner.**

¹⁰ Save the Children have piloted adapted versions of existing child participatory tools that have been used widely across the organisation to solicit feedback from children of varying age groups.

Distinctions should be made between dedicated complaint and feedback mechanisms, and the differences clearly communicated to the community, including on mechanisms set up for project-specific, agency-specific, and multi-sectoral accountability, and the intended functions and limitations of each mechanism.

When feedback is received directly from individuals, every effort must be made to ensure complainants are not exposed to safety risks and retaliation. **Confidentiality and data protection must be ensured and communicated to the individual making a complaint or giving feedback.**

It is of utmost importance that agencies establish formalised referral pathways and give responses to community feedback in a timely manner to close the feedback loop.

Prevention of Sexual Exploitation and Abuse (PSEA)

The Accountability Manifesto is aligned as well with the PSEA Network strategy, Objective 3: *Response to Sexual Exploitation and Abuse (SEA) survivors, and reporting systems*

SEA survivors are provided with effective and timely support, as well as multi-sectoral service provision to address their needs. Refugees, host communities and all UN, their partners and contractors are able to report SEA incidents to available channels. Prompt action is taken to refer allegations to appropriate investigation units for follow-up, including possible disciplinary action.

Feedback and complaint mechanisms are accessible channels for women, girls, boys, and men to communicate with UN Agencies, International and National NGOs, and all partners and contractors and receive response in a timely manner. These mechanisms enable both personnel and refugees to make SEA complaints and to seek redress in a safe and confidential environment.

A. Establishing Improved Accountability Mechanisms and Orientation**Core Messages**

- Accountability orientation is essential for all frontline staff, mobilisers, community leaders, committees and others.
- Mechanisms must be harmonised with assessments to avoid over-surveying of populations.
- A diversity of mechanisms is required.
- Primacy must be given to face-to-face and oral mechanisms.
- Location of mechanisms is important, such as prioritising access for women, children¹¹ and persons with disabilities, and ensuring mechanisms are easily available throughout camps.
- Complaint boxes and hotlines should be minimised or used with multiple mechanisms
- Rohingya language should be prioritised (orally as there is no written language), with both Bangla and Burmese for text.

Accountability Orientation

Orientation on accountability must be provided to all actors engaging with affected populations, particularly those with regular direct communication, such as community leaders, camp/block committees, sectoral committees, community mobilisers, volunteers and humanitarian staff.

This is particularly critical for members of affected populations because they often know the situation best, but may not otherwise relay information for several reasons, such as not knowing how, or for fear of losing assistance. Accountability orientation must:

- Explain the importance of accountability and everyone's right to receive accurate information in their (affected community) and provide feedback/complaints without fear of reprisal.
- Explain the code of conduct of humanitarian workers highlighting the obligation of staff not to exploit, abuse or otherwise discriminate against people.
- Be localised, to introduce the different mechanisms available to the community in their area
- Explain the different options for complaints and feedback: making a complaint to a specific agency or program (e.g. on food distribution), raising protection sensitive complaints, vs. making a general complaint, anonymous or otherwise, etc.
- Explain the importance of confidentiality and voluntary participation.
- Outline processes for closing the feedback loop.
- Ensure clarity on setting reasonable expectations for affected populations, such as challenges of responding quickly.

Diversified and Prioritised Accountability Mechanisms**(i) Face-to-face Interaction: High Priority**

Specific actors (such as community mobilisers) should be designated for face-to-face interaction, such as collecting feedback and complaints from individuals and households through door-to-door visits, and group discussions with people who share characteristics such as gender and age.

¹¹ Save the Children have launched a pilot to test (i) the use of child-friendly Complaints Feedback and Response Mechanisms (CfCFRMs) for collecting feedback and complaints from children, (ii) the adaptation of our existing mechanisms for processing, analysing and reporting on feedback and complaints to reflect the new data collection approach, and (iii) the use of child-friendly methods for closing the feedback loop at individual and community level. The pilot will run from October-December 2018; after which, Save will look to scale up the approach based on lessons learned during the piloting process.

This is important for reaching adolescent girls, women, older people and people with disabilities, injuries and chronic illnesses, and other homebound community members.

Humanitarian actors need clear guidelines beyond orientation to ensure accountability is voluntary, confidential and sensitively handled. Setting reasonable expectations and providing effective referral pathways is also important. Data must be systematically documented to effectively feed into analysis and inform the response.

(ii) Strategically Located Information Hubs, Information Points and Help Desks: High Priority

Information Hubs, Information Points and Help Desks should be rolled out more broadly as hubs not just for information sharing, but also for formally receiving feedback/complaints. Help desks should be operated by people trained on accountability, protection, PSEA, and confidentiality, and have regular and well-publicised opening hours.

The modality of closing the feedback loop should be made clear to the community in general and to anyone who makes a complaint or gives feedback. Orientation for people staffing the help desks is critical. Help desks should be clearly visible, accessible and located throughout camps.

(iii) Tablet/Electronic Mechanisms: Encouraged, High Priority

Electronic mechanisms such as tablet-based apps are encouraged as part of the broader accountability ecosystem. They can link with door-to-door efforts as a way of capturing the data in real-time and off-line rather than taking hard copy notes to type into a spreadsheet or similar.

It is critical that accountability is harmonised with other assessment and M&E mechanisms to avoid overburdening affected populations with information collection.

(iv) Voice Recorders at Strategic Locations: Medium Priority

Considering low levels of literacy and poor phone access, voice recorders with play/listening functionality could be an important mechanism to enable confidential and anonymous feedback, if guidance is given on the sort of information that is needed for the listener to be able to respond to it, and the importance of speaking slowly and clearly. Recorders need to be situated in strategic locations, such as Information Hubs, Information Points, Help Desks, women/child-friendly spaces, cooking spaces, with easy and confidential access.

Recorders need to be maintained by trained volunteers or similar and expectations for response need to be managed with appropriate guidance. The voice recorder use should be guided by Standard Operating Procedures that ensures confidentiality from the staff collecting feedback using this method. Data safeguarding is critical. The potential to roll out voice recorders involving site management actors should also be explored.

Regular data collection and closing the feedback loop is important, such as reporting back on issues through volunteers or recordings that are played at each location. Whilst no research has been conducted on the use of the voice recorders, it has been observed that the voice recorders offer a platform where communities can provide feedback whilst also choosing to remain anonymous. The staff handling the voice recorders should be adequately trained to ensure that they maintain confidentiality in handling feedback and complaints.

(v) *Feedback/Complaint Boxes and Hotlines: Minimise Dependency, Low Priority*

Complaint boxes and hotlines are not highly trusted or preferred accountability tools for the Rohingya population (Internews 2017, CAID 2018) and have not generally proven accessible for people with low levels of literacy, who depend on oral language and who have faced barriers to the right to education for many years. Moreover, as men are more likely to own phones, Hotlines may be comparatively even less accessible to women. Hotlines and feedback/complaint boxes can play a limited role as mechanisms that are part of a broader system, but should not be relied upon as only or primary tools.

Community orientation about feedback boxes via community mobilisers, volunteers and other frontline staff is critical, as is the strategic location so that these feedback channels are at once public (so people know where they are) and private (so people can put their feedback in without being noticed). Boxes need to be locked and cleared regularly for data entry, referral and response.

B. Improving Community Awareness on Humanitarian Rights and Transparency of the Humanitarian system

The Rohingya community's low exposure to the humanitarian-system before coming to Bangladesh reduces uptake of services and makes them more vulnerable to abuse of power. It also poses a significant barrier to holding the humanitarian community to account.

A full accountability framework should include communicating with communities on what they can expect from humanitarian assistance, humanitarian organisations and staff, what are the rules, procedures and services, including the decision-making processes behind them. This includes how projects are designed; how participants selected (targeting); as well as the outcomes and impact (whether they were achieved or not achieved). This also includes, in addition to the Code of Conduct of humanitarian workers, the impact of sexual exploitation and abuse on the refugee's life and on the broader humanitarian response, and the existence of available community based complaints mechanisms, the process of reporting SEA to Focal Points or investigation units, and where to go to for help.

Core Processes

- Delivery of humanitarian rights awareness to affected populations, with focus on Core Humanitarian Standards, SPHERE standards, PSEA and gender mainstreaming.
- Ensure linkages between humanitarian rights awareness and the right to provide feedback/complaints and be involved in decision-making.
- Accountability processes should include community-based communication on the decision-making process to increase transparency and encourage the community to provide feedback, considering gender and protection dimensions to ensure inclusion.
- Communication should primarily be organised through face-to-face and visual and oral mechanisms. Text-based mechanisms should be minimised.

Understanding one's rights related to humanitarian assistance is a precursor to being able to effectively hold humanitarian actors to account and engage with accountability mechanisms.

Considering the generally low understanding of humanitarian-related rights of affected populations in Cox's Bazar, significant attention must be paid to improving awareness and understanding of these rights.

This should be framed around sector-wide and agreed upon standards, such as CHS and SPHERE¹², but also PSEA, gender and other cross-cutting rights. Once again, the delivery of initiatives should be based upon findings of various assessments already enumerated in this Manifesto and other research that may be forthcoming, with priority given to face-to-face and verbal communication methods.

Rights should be communicated in clear and practical terms rather than abstract concepts, including tailored communications for all groups, taking into account gender, age (e.g. children) and diversity (e.g. persons with hearing or sight impairment).

C. Systematic Camp-level Information Documentation and Referral Processes

Core Processes

- Camp-wide, multi-sector accountability systems should be in place to complement organisation-centric mechanisms.
- The system at camp level will be a complex matrix of inter-relationship. The government Camp in Charge (CIC), Site Management agency, Info hubs/Information centres and all other implementing agencies to play critical interconnected role.¹³
- While the feedback and complaints specifically related to particular agency to be dealt with by the respective agency, any issue beyond individual agencies prerogative, may be taken up to the Site Management forum or Camp Coordination Committee where the CIC and Site Management agency plays key role. Here the focal from each sector also has a role to play as they connects the issues on the ground with sector level initiatives to resolve them.
- Protection and GBV/PSEA Focal Points should be approached where sensitive, individual protection referrals are concerned, in line with the Protection Sector and PSEA Referral Pathways.
- Other anonymous and non-sensitive data to be referred to and dealt by respective camp-based humanitarian actors. If the feedback received directly by the concerning agency it will be directly acted upon. On the other hand, if the feedback is concerning other agency, it will be referred/shared with respective agency who then can take appropriate action and report back to the first point of receiving the information to close the loop.
- Regarding the issues relevant for overall response in the camp, collected feedback/complaints needs to be efficiently and properly processed by site management actors **or protection actors when circumstances require so**, and fed back to camp-based humanitarian actors. This is best done through camp-level sector focal and with individual organisations on a regular and timely basis.

At site level, project-based or agency-based complaints and feedback mechanisms should incorporate referral of complaints and feedback received outside the agency's mandate or capacity for response to a relevant service provider or a multi-sectoral mechanism. This would enable following up on either an individual case basis or to inform overall community feedback and information processes.

¹² Broader human rights and durable solutions concepts are intentionally omitted. Despite their importance, focusing on such rights is a sensitive issue with some actors, and has thus not been included here.

¹³ Refer to the Accountability Diagram at the last page.

Proliferation of different agencies running multi-sectoral complaints and feedback mechanisms covering the same geographic areas should be avoided. Multi-sectoral mechanisms should be linked with Site Management Support to ensure consistency of information provision and response, and to ensure feedback and complaints are effectively informing camp-level decision making and to facilitate closing the accountability loop. This includes systematic and timely documentation, analysis of trends, and consistency of information and responses being shared back with the population.

A camp-wide accountability system is beneficial to improve accountability and to increase the likelihood that complaints/feedback feed into the broader response. Considering the high volume of humanitarian actors in each camp, it is unreasonable to ask affected community members to seek out specific actors if they want to give feedback or complaints. It is also common that community members are unaware of who they should be contacting. Therefore, a multi-sectoral system independent of any organisation is critical. Effective cooperation from humanitarian actors is important to the success of such a system.

In many cases, informal engagement may be sufficient to close the feedback loop, but formalised data-sharing is essential to analyse and visualize short briefs on camp-level trends and qualitative information. Such documentation can then assist in monitoring and analysing trends over time and be utilised when designing new programming. To establish an automated process for this a central and common data platform (a common server accessible to all camp level actors for data input) to be established. Based on data input the software based application will immediately produce an analysis (like-showing sector-wise, block/sub-block wise, agency wise or type wise number of feedback received, resolved or pending etc.). This will help to ensure better accountability of agencies in the camps and thus will strengthen the site management/coordination.

D. Closing the Feedback Loop: putting community at the center

Core Processes

- Answers and information are regularly provided back to affected populations in direct response to issues raised through the accountability system at the first place. This occurs at both the individual complainant level (with their consent) and at the community level.
- Feedback and information is shared through a variety of channels according to the preferred means to consume information by various groups within the affected populations.
- Humanitarians must seek to maintain realistic expectations amongst affected populations.

Ensuring information/response is provided back about issues raised through the accountability system is a fundamental matter of human dignity – the respect and recognition of equality between those assisted and those engaged for assisting them.

It is important for affected populations to know what has been or is being done about the issues they raise or what options are available to them. This return of information not only can maintain trust in an accountability system, it ideally also increases trust in general and, therefore, participation.

In case of issues that concerns a group of people/ community, the answers/ response/ solution/ information should be compiled and returned to affected populations, particularly through the locations where feedback and complaints were received at the first place. For example, responses

should be at Women and Child Friendly Spaces and cooking areas where voice recorders are located, at help/info desks, and at spaces where people regularly congregate such as distribution points.

Information dissemination should adhere with affected populations' information consumption preferences, as outlined in Internews' Information Needs Assessment, Ground Truth Solutions' Feedback and Trust Survey, where face-to-face and aural mechanisms, like radio are said to be preferred by refugees. Consistent messaging informed by sectors/actors is also essential.

E. Response-Wide Aggregation of Data and Meta-Analysis

Complementing camp-level data processing and analysis, information must be fed to and be analysed by CwC analysis actors i.e. agencies who work on analysis of feedback, complaints, and rumours etc. and share the findings with wider humanitarian audiences. Data sharing should be done in a disaggregated and anonymised manner following data protection agreements between the individual agency at camp level and the CwC analysis actors. Data analysis will be done both at camp and sector level to inform and influence the broader response. This forms a key component of evidence-based advocacy, while the data and analysis can also inform broader advocacy efforts.

Core Processes

- The process of aggregation of data at central level is not necessarily separate from common data platform for the camp level. All actors in the camps (including site management agency, info hubs, and individual implementing agencies) should feed camp-level data into a common data platform for response-wide data analysis.
- The central data platform will be maintained by the CwC Analysis Actors for example- the Common Service Consortium comprising BBC Media Action/Internews/Translators without Borders, as well as other relevant partners and service providers. The Common Service Consortium currently provides a meta-analysis of response-wide trends, which is disseminated back to camp-based actors and use for response-wide evidence-based advocacy and adaptive programming.
- Even if individual humanitarian actors have not shared data with site management actors or camp level actors, they should directly share it with the common data platform in an anonymised and disaggregated way on a regular basis.
- Commonly agreed upon data points are important for improving efficiency and ease of analysis.

Accountability is a crucial component of any humanitarian response, thus all humanitarian actors should take responsibility to mainstream it. The Accountability Manifesto serves to support all agencies, partners and Sectors in strengthening language, cultural and diversity appropriate multi-channel feedback and complaints mechanisms on the ground; promote harmonised complaints and feedback mechanism tool to facilitate safe referrals, timely response and comprehensive analysis of trends; and ensure coordinated involvement of actors of all level in order that refugee concerns and voices resonate in all manner of advocacy and programming.

The Accountability Coordination and Camp Referral Pathways Diagrams, as well as the various Standard Operating Procedures (SOP) and Guidance- with further plans to establish a common feedback and complaints mechanisms-is hoped to provide concrete action plans and ways forward for all agencies to strengthen project/programme level feedback mechanisms, as well as inter and intra Sector accountability.

Reference and Further Reading:

1. *A Red Cross Red Crescent Guide to Community Engagement and Accountability (CEA)*
2. *Core Humanitarian Standard on Quality and Accountability*

COMPLAINT & FEEDBACK MECHANISM: Information Flow Chart (updated on 01.08.2019)



