

## 1. Introduction

## 1.1 Purpose

This policy is intended to ensure that we handle complaints fairly, efficiently and effectively.

Our complaint management system is intended to:

- Enable us to respond to issues raised by people making complaints in a timely and costeffective way
- Boost public confidence in our administrative process, and
- Provide information that can be used by us to deliver quality improvements in Proud Lebanon's services, staff and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

## 1.2 Scope

This policy applies to all staff receiving or managing complaints from the public made to or about us, regarding Proud Lebanon's services, staff and complaint handling.

## 1.3 Organisational commitment

This organisation expects staff at all levels to be committed to fair, effective and efficient complaint handling. The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.



| Who                                                                                                                                                                                        | Commitment                                                              | How                                                                                                                                             |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| Head of Proud<br>Lebanon                                                                                                                                                                   | Promote a culture that values complaints and their effective resolution | Report publicly on Proud Lebanon's complaint handling.                                                                                          |
|                                                                                                                                                                                            |                                                                         | Provide adequate support and direction to key staff responsible for handling complaints.                                                        |
|                                                                                                                                                                                            |                                                                         | Regularly review reports about complaint trends and issues arising from complaints.                                                             |
|                                                                                                                                                                                            |                                                                         | Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.                       |
|                                                                                                                                                                                            |                                                                         | Encourage staff to make recommendations for system improvements.                                                                                |
|                                                                                                                                                                                            |                                                                         | Recognise and reward good complaint handling by staff.                                                                                          |
|                                                                                                                                                                                            |                                                                         | Support recommendations for Proud Lebanon's service, staff and complaint handling improvements arising from the analysis of complaint data.     |
|                                                                                                                                                                                            |                                                                         | In case complaints are about the head of Proud Lebanon, Director will step out during investigation.                                            |
| Committee in charge of the complaints consisted of 1 Executive Board member & 1 Advisory board member that will be nominated by the Advisory board committee when complaints are received. | Establish and manage our complaint management system.                   | Provide regular reports to both boards (advisory & Executive) on issues arising from complaint handling work.                                   |
|                                                                                                                                                                                            |                                                                         | Ensure recommendations arising out of complaint data analysis are canvassed with [the head of Proud Lebanon] and implemented where appropriate. |
|                                                                                                                                                                                            |                                                                         | Ensure that all complaints are handled and investigated seriously; adapted actions are taken for each complaint.                                |
|                                                                                                                                                                                            |                                                                         | Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system.                   |
|                                                                                                                                                                                            |                                                                         | Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.                       |
|                                                                                                                                                                                            |                                                                         | Recognise and reward good complaint handling by staff.                                                                                          |



| Staff whose duties include complaint handling | Demonstrate<br>exemplary<br>complaint<br>handling<br>practices           | Treat all people with respect, including people who make complaints.                                                                   |
|-----------------------------------------------|--------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|
|                                               |                                                                          | Assist people make a complaint, if needed.                                                                                             |
|                                               |                                                                          | Comply with this policy and its associated procedures.                                                                                 |
|                                               |                                                                          | Keep informed about best practice in complaint handling.                                                                               |
|                                               |                                                                          | Provide feedback to management on issues arising from complaints.                                                                      |
|                                               |                                                                          | Provide suggestions to management on ways to improve the organisation's complaints management system.                                  |
|                                               |                                                                          | Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.                |
| All staff                                     | Understand and comply with Proud Lebanon's complaint handling practices. | Treat all people with respect, including people who make complaints.                                                                   |
|                                               |                                                                          | Be aware of Proud Lebanon's complaint handling policies and procedures.                                                                |
|                                               |                                                                          | Assist people who wish to make complaints access the Proud Lebanon's complaints process.                                               |
|                                               |                                                                          | Be alert to complaints and assist staff handling complaints resolve matters promptly.                                                  |
|                                               |                                                                          | Provide feedback to management on issues arising from complaints.                                                                      |
|                                               |                                                                          | Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management. |
|                                               |                                                                          |                                                                                                                                        |



### 2. Terms and Definitions

### Complaint

Expression of dissatisfaction made to or about Proud Lebanon or its services, staff or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

A complaint covered by this Policy can be distinguished from:

- Staff grievances [see our grievance policy]
- Public interest disclosures made by our staff [see our internal policy]
- Code of conduct complaints [see Proud Lebanon's code of conduct]
- Responses to requests for feedback about the standard of our service provision [see the definition of 'feedback' below]
- Reports of problems or wrongdoing merely intended to bring a problem to our notice with no expectation of a response [see definition of 'feedback]
- · Service requests [see definition of 'service request' below], and
- · Requests for information [see our access to information policy].

### **Complaint management system**

All policies, procedures, practices, staff, hardware and software used by us in the management of complaints.

#### **Dispute**

An unresolved complaint escalated either within or outside of our organisation.

#### **Feedback**

Opinions, comments and expressions of interest or concern, made directly or indirectly, explicitly or implicitly, to or about us, about Proud Lebanon, its services or complaint handling where a response is not explicitly or implicitly expected or legally required.

#### **Service request**

The definition of a service request will vary depending on the organisation's core business. However, it is likely to include:

- · Requests for approval
- · Requests for action
- Routine inquiries about the organisation's business
- · Requests for the provision of services and assistance
- · Reports of failure to comply with laws regulated by the organisation
- · Requests for explanation of policies, procedures and decisions.



#### **Grievance**

A clear, formal written statement by an individual staff member about another staff member or a work related problem.

### **Policy**

A statement of instruction that sets out how we should fulfil our vision, mission and goals.

#### **Procedure**

A statement or instruction that sets out how our policies will be implemented and by whom.

## 3. Guiding principles



## 3.1 Facilitate complaints

#### **People focus**

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within the following time frame:

- 1. We will send you a letter acknowledging receipt of your complaint within three days of receiving it, enclosing a copy of this procedure.
- 2. We will then investigate your complaint. This will normally involve the complaint handling committee consisted of 1 Executive Board member and 1 Advisory board member, who will review your matter file and speak to the member of staff who acted for you.
- 3. Proud Lebanon's complaints' handling committee will then invite you to a meeting to discuss and hopefully resolve your complaint. S/he will do this within 14 days of sending you the acknowledgement letter.



- 4. Within three days of the meeting, Proud Lebanon's complaints' handling committee will write to you to confirm what took place and any solutions s/he has agreed with you.
- 5. If you do not want a meeting or it is not possible, Proud Lebanon's complaints' handling committee will send you a detailed written reply to your complaint, including his/her suggestions for resolving the matter, within 21 days of sending you the acknowledgement letter.
- 6. At this stage, if you are still not satisfied, you should contact us again and we will arrange for an Advisory board member to review Proud Lebanon's complaints' handling committee decision.
- 7. We will write to you within 14 days of receiving your request for a review, confirming our final position on your complaint and explaining our reasons.

### No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

#### **Anonymous complaints**

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

#### **Accessibility**

We will ensure that information about how and where complaints may be made to or about us is well publicised. We will ensure that our systems to manage complaints are easily understood and accessible to everyone, particularly people who may require assistance.

If a person prefers or needs another person or organisation to assist or represent them in the making and/ or resolution of their complaint, we will communicate with them through their representative if this is their wish. Anyone may represent a person wishing to make a complaint with their written consent (e.g. advocate, family member, legal or community representative or another organisation).

#### No charge

Complaining to us is free.

### 3.2 Respond to complaints

#### **Early resolution**

Where possible, complaints will be resolved at first contact with Proud Lebanon.



### Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

- The complaints process
- · The expected time frames for our actions
- · The progress of the complaint and reasons for any delay
- · Their likely involvement in the process, and
- The possible or likely outcome of their complaint.

We will advise people as soon as possible when we are unable to deal with any part of their complaint and provide advice about where such issues and/or complaints may be directed (if known and appropriate).

We will also advise people as soon as possible when we are unable to meet our time frames for responding to their complaint and the reason for our delay.

### **Objectivity and fairness**

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

#### Responding flexibly

Our staff members are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

#### Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by Proud Lebanon as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.



### **Complaints concerning Sexual abuses**

In case of proven sexual abuses or misconduct committed by any of Proud Lebanon's staff, including management members and volunteers, Proud Lebanon will offer legal support if the complainer intend to pursue the perpetrator in addition to all the support needed in his legal process.

The working agreement will be suspended during the lawsuit process and will terminate it if sentenced.

## 3.3 Manage the parties to a complaint

### Complaints involving multiple agencies

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible; to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

#### Complaints involving multiple parties

When related parties make similar complaints we will try to arrange to communicate with a single representative of the group.

#### **Empowerment of staff**

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Staff members are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

#### Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in



accordance with this policy.

## 4. Complaint management system



### 4. 1 Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints. Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

## 4.2 Receipt of complaints

Unless the complaint has been resolved at the outset, we will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making a complaint
- Issues raised by the person making a complaint and the outcome/s they want
- · Any other relevant and
- Any additional support the person making a complaint requires.

## 4.3 Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within (specify number) of working days.

Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.

## 4.4 Initial assessment and addressing of complaints

#### **Initial assessment**

After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control. We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to



be separately addressed.

When determining how a complaint will be managed, we will consider:

- · How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- · How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

### **Addressing complaints**

After assessing the complaint, we will consider how to manage it. To manage a complaint we may:

- Give the person making a complaint information or an explanation
- · Gather information from the person or area that the complaint is about, or
- Investigate the claims made in the complaint.
- · Check the proofs and other related documents provided.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

## 4.5 Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place, and
- Any options for review that may be available to the complainant, such as an internal review, external review or appeal.

## 4.6 Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- · How we managed the complaint
- The outcome/s of the complaint (including whether it or any aspect of it was substantiated, any recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.

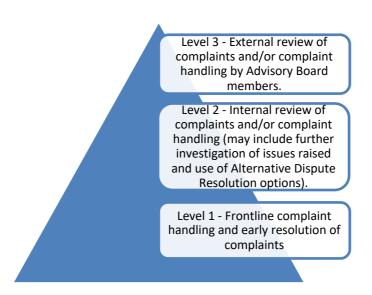
We will ensure that outcomes are properly implemented, monitored and reported to the complaint-handling manager and/or senior management and Executive Board.



## 4.7 Alternative avenues for dealing with complaints

We will inform people who make complaints to or about us about any internal or external review options available to them.

## 4.8 The three levels of complaint handling



## 5. Accountability and learning

## 5.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- · Issues arising from complaints
- · Systemic issues identified, and
- The number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

Both reports and their analysis will be provided to Proud Lebanon's Boards for review.



## 5.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- · Ensure its effectiveness in responding to and resolving complaints, and
- Identify and correct deficiencies in the operation of the system.
- Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

## 5.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- · Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- · Recognise and reward exemplary complaint handling by staff
- · Regularly review the complaints management system and complaint data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.



# Proud Lebanon's Complaint Form Please let us know what you think.

## Information privacy

When handling your complaint Proud Lebanon's complaints handling committee (consisted of 1 Executive board member and 1 Advisory board member) will:

- Only collect, use and disclose personal information where it is necessary to do so
- Secure any personal information we collect to prevent loss, misuse, unauthorized access or disclosure.

### Confidentiality

The Proud Lebanon's complaints handling committee treats all complaints as confidential. Unless you give us permission to do so, we will not disclose the details of your complaint, or your identity as the complainant, to:

- The staff or personnel you are complaining about
- Other agencies.

When Proud Lebanon's complaints handling committee investigates a complaint, however, it may be necessary for us to reveal certain details to give the management, advisory board or executive board so they can respond.

If your complaint is about an issue that only affects you, it may not be possible for the Proud Lebanon's complaints handling committee to fully investigate without identifying you as the complainant.

When you make a complaint, the Proud Lebanon's complaints handling committee will work with you to understand which details of your complaint you permit being released. You can talk to our complaints committee at any time about privacy issues.

#### **Anonymous complaints**

The Proud Lebanon's complaints handling committee accepts anonymous complaints. However, if you do not identify yourself as the complainant the Proud Lebanon's complaints handling committee may be limited in our ability to investigate your complaint. We need as much information and proofs as possible.

The Proud Lebanon's complaints handling committee will generally investigate anonymous complaints only if enough information and proofs are provided to make an investigation feasible and the issues warrant an investigation.

You can talk to our committee without identifying your details to discuss the situation you are concerned about



| Overview                                                                     | This is the official Complaint Handling Procedure across Proud Lebanon                                                                                                               |
|------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| What service or department you wish to complain about?                       | <ul> <li>Management</li> <li>Medical support</li> <li>Psychological support</li> <li>Legal support</li> <li>Awareness raising sessions</li> <li>Workshops</li> <li>Others</li> </ul> |
| Have you benefitted from any of these services? And When?                    | <ul><li>Yes</li><li>No</li><li>Date:</li></ul>                                                                                                                                       |
| Staff involved?                                                              |                                                                                                                                                                                      |
| Nature of the complaint                                                      |                                                                                                                                                                                      |
| Documents / proofs provided                                                  |                                                                                                                                                                                      |
| Enough information and proofs are provided to make an investigation feasible |                                                                                                                                                                                      |
| Detail of Complaint: (A detailed description of the complaint)               |                                                                                                                                                                                      |
| Date                                                                         |                                                                                                                                                                                      |
| Complainer contact details                                                   | Name: Phone number: E-mail:                                                                                                                                                          |
| (Confidential)                                                               |                                                                                                                                                                                      |
| Reviewed by                                                                  |                                                                                                                                                                                      |
| Outcomes Follow up if required                                               |                                                                                                                                                                                      |