

ACCOUNTABLE NOW

Complaints handling procedure for Accountable Now Members

This policy outlines how Accountable Now handles feedback and complaints about its [member organisations](#). For feedback or complaints about the work of Accountable Now, its staff or other affiliated persons, including the Independent Review Panel, or Board, please use our [Accountable Now Feedback and Complaints Policy](#).

1. Purpose

Accountable Now is committed to supporting our [members](#) be transparent, responsive to their stakeholders, and focused on delivering impact. Our members endorse our [12 Accountability Commitments](#) when they join us, and report to us annually on how they are implementing and upholding these commitments. Members' accountability reports, together with feedback from our Independent Review Panel, can be found [here](#).

We expect our members to share with us in these reports any challenges or setbacks they may experience, so that we can advise and assist them in improving their accountability practices.

If you have any concerns about our members' accountability practices – internal or external –we encourage you to share this information with us. This will help us hold our members to account and provide feedback that can help them strengthen their accountability mechanisms.

In this document we outline what can be expected from Accountable Now when we receive complaints about members, and the process and timelines for responding to the complainant.

2. Our approach to handling complaints

Accountable Now will uphold the following principles when handling complaints:

Confidentiality: We are committed to protecting the privacy and safety of those who submit feedback to us, as well as anyone else named or otherwise involved in the issue. All information received will be treated in confidence, and will not be shared with anyone who is not directly involved in the processing of the



complaint. When sharing the complaint we receive with the relevant member organisation and with our Independent Review Panel, we will remove all identifying information relating to the complainant, including names, contact information, and information about the complainant's position – unless the complainant requests otherwise.

Objectivity: Complaints are addressed in an impartial and objective manner. Any potential conflicts of interest on the part of the Secretariat or Independent Review Panel will be declared, and the person with a conflict of interest will be excused from the complaint review and response process.

Timeliness: Complaints that fall within the scope of this policy, as defined above, will be processed in accordance with the timeframes outlined below in Section 7, Process. Any delays to the process will be communicated to the parties involved as soon as possible, with an estimated new timeline.

Learning-oriented approach: It is Accountable Now's aim that all complaints received lead to learning and improvement, both for our members and for us. As such, we will work with our members to address any weaknesses or deficiencies that may be brought to light by the complaints we receive, and encourage them to communicate transparently about their learnings and progress.

3. Key terms and concepts

The following terms are defined for the purpose of this policy:

Feedback: Any positive or negative statement of opinion. It may be expressed formally or informally, and may or may not require a response.

Complaint: A complaint is a sub-set of feedback, and expresses a negative opinion or dissatisfaction. It is expressed formally and a response and/or resolution is expected. In the context of this policy, complaints cannot be investigated by Accountable Now. They will be used to foster discussions with Accountable Now members as to how they can improve their processes.

Serious/sensitive complaint: These are complaints relating to gross misconduct, such as sexual exploitation and abuse, fraud, corruption, or other illegal actions.

Accountable Now members (members, member organisations): The civil society organisations that have joined Accountable Now, have signed on to the 12 Accountability Commitments, and submit annual accountability reports.



Accountable Now Secretariat (Secretariat): The Secretariat develops Accountable Now's strategy, implements work plans and programmes, and coordinates other bodies such as the Independent Review Panel.

Independent Review Panel (IRP): A body of independent accountability experts who review and provide feedback on Accountable Now member's annual accountability reports.

4. Scope

Complaints addressed by this policy

This policy applies to all [Accountable Now members](#) and may relate to:

- Members' compliance with our 12 Accountability Commitments
- Members' compliance with their own policies
- The functioning of members' own feedback and complaints mechanisms

Please be aware that in each of these cases, Accountable Now is not in the position to investigate, mediate, or take any other (sanctioning) action towards resolving individual cases. What we can and will do is to use the information we receive when reviewing the members' accountability reports to assess their approach and processes more broadly. Furthermore, the information will allow us to provide tailored feedback on members' approaches to strengthen their practices.

Members' own feedback and complaints mechanisms

Having a functioning feedback and complaints mechanism is a key requirement for Accountable Now members, as mentioned in our [membership criteria](#). Our minimum expectations and some examples of strong complaints mechanisms can be found in our [reporting guidance document](#), points J3 and J4.

Accountable Now's members are responsible for developing and maintaining their own feedback and complaints mechanisms, and responding to any feedback or complaints received in line with their own policies. Accountable Now is not able to investigate complaints against members or mediate in their resolution.

If, however, you believe one of our members' feedback or complaints mechanisms is not functioning, please bring this to our attention as outlined below in Section 7.



Members' compliance with our 12 Accountability Commitments or with their own policies

Accountable Now members report on their efforts to uphold our 12 Accountability Commitments in their [annual accountability reports](#), and our Independent Review Panel provides feedback. Members also have their own organisational policies guiding their work and processes. These can, in most cases, be found on the member's website.

If you have reason to believe that one of our members has failed to uphold the Accountability Commitments or to abide by their own policies, we would request that you first contact the member in question to discuss the issue with them directly through their own complaints mechanism, which every Accountable Now member is expected to have. If you are unable to find a member's complaints mechanism we are happy to point you to the relevant channel.

If, after getting in touch with the member, you still have concerns or believe the issue is not being responded to appropriately, you may get in touch with the Accountable Now Secretariat as outlined below in Section 7.

In cases of major incidents or public accusations of non-compliance with the set of values that Accountable Now stands for (such as safeguarding issues, fraud or corruption accusations, etc.), members are expected to swiftly inform the Secretariat, in addition to the appropriate authorities. A critical incident report should be submitted to explain the accusation as well as provide an initial assessment and contact person. Members are also expected to inform the relevant regulatory commission so that they can undertake their own process and refer to this in the critical incident report.

Complaints not addressed by this policy

Accountable Now is not able to accept or look into complaints outside the above scope, including, but not limited to:

- Issues that are currently being dealt with through internal procedures within the member organisation
- Issues that are, or could be, the subject of legal proceedings e.g. relating to contractual matters or criminal activities. These should be dealt with under the appropriate legal jurisdiction.
- Complaints about Accountable Now staff or other affiliated persons, including the Secretariat, Independent Review Panel, or Board. For any



concerns related to Accountable Now and its staff, please use our [Accountable Now Feedback and Complaints Policy](#).

- Issues relating to organisations that are not Accountable Now members – including former members

5. Who may submit a complaint?

Any person or entity may submit a complaint about our members to Accountable Now, as long as it is in line with the points laid out in Section 4, Scope.

Complaints may be submitted anonymously. However, this may limit the extent to which we are able to respond to the complainant, particularly if contact details are not provided.

6. Who will be involved in reviewing the complaints we receive?

All complaints submitted via email will be received by Accountable Now's Programme Manager. The information may be shared with Accountable Now's Executive Director as necessary.

A summary of the complaint – without any information that could disclose the complainant's identity – will then be shared with Accountable Now's key contact person at the relevant member organisation.

The information will also be shared with the members of Accountable Now's Independent Review Panel who review the member organisation's next accountability report, as well as the IRP Chair.

On a monthly basis, the Secretariat will share information with the Board Chair on complaints received and actions taken to address them.

Where there are potential conflicts of interest within the Accountable Now Secretariat or Independent Review Panel, an alternative staff member or Panel member will be appointed to deal with the matter.

7. Process for submitting complaints about an Accountable Now member

Submitting a complaint

If you have reason to believe one of our members has failed to uphold their 12 Accountability Commitments, to abide by their own organisational policies, or to



properly respond to feedback or complaints they have received under their own mechanisms (as outlined above in Section 4, Scope) we would request that you first contact the member in question to try to resolve the issue with them directly.

If, after getting in touch with the member, you still have concerns or believe the issue is not being responded to appropriately, you may get in touch with the Accountable Now Secretariat at: feedback@accountablenow.org or by post addressed to:

The Programme Manager

Accountable Now

Agricolastrasse 26

10555 Berlin, Germany

Please provide the following information:

1. Which Accountable Now member your complaint relates to
2. An explanation of the issue, including which of the 12 Accountability Commitments, member policies, practices or mechanisms the complaint relates to
3. Any steps you have already taken in this regard, including previous correspondence with the member in question
4. Whether you wish to keep your identity confidential

How we will process complaints

Recording the complaint: The complaint, once received, will be recorded by the Accountable Now Secretariat in a secure password protected online folder. All communication and documents relating to the issue will be saved in the folder.

Acknowledgement of receipt: The Accountable Now Secretariat will acknowledge receipt of the complaint within five working days, explaining the Secretariat's mandate, next steps, and scope/limits of actions. This information will be communicated to the complainant via email, as far as this is possible.

Communication with the member: The Accountable Now Secretariat will share a summary of the complaint (removing any identifying information) to the relevant member within ten working days of receipt, and agree on a plan for the member to address the issue.



Response from the member: Within 15 working days after communicating with the Secretariat, the member will respond to the Secretariat in writing, explaining the process they will undertake to deal with the issue.

Following up with the complainant: The Secretariat will share the member's response, as well as any additional response or action to be taken by Accountable Now, with the complainant within five working days of the member's response. The Secretariat will monitor the implementation of the member's response plan and share relevant updates with the complainant.

Sharing information about complaints

Informing the Independent Review Panel: When the member involved submits their next accountability report, the Secretariat will share a summary of the complaint received, the member's response, and any other relevant communication to the Chair of the Panel and the Panel members reviewing the member's report. This will serve as extra information for them to consider when providing their feedback.

Informing the Accountable Now Board: The Secretariat will provide the Board with a summary of complaints received against members, and the outcomes, at each Board meeting.

8. Review of this policy

This policy was last reviewed and approved by the Board in May 2019. The policy will be periodically reviewed to assess whether it is still effective and fit for purpose. Updates may be made as frequently as needed, subject to approval by the Board.