ACCOUNTABLE NOW
Feedback and Complaints Policy

This policy outlines how Accountable Now handles feedback and complaints about the work of Accountable Now, its staff or other affiliated persons. If you have feedback or complaints about the work of Accountable Now’s member organisations please see this statement.

1. Purpose

Accountable Now strives to operate in line with the 12 Accountability Commitments it promotes, our Code of Conduct, and values. If there are any concerns relating to the actions of Accountable Now or its staff, we offer a mechanism to address these concerns.

This document outlines what can be expected from Accountable Now’s Secretariat and Board when we receive complaints, and the process and timelines for responding to the complainant.

Although this policy does not go into detail on receiving neutral or positive feedback, Accountable Now welcomes all kinds of feedback about our work, and encourages people to submit this to us via feedback@accountablenow.org

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. If we need to share the complaint we receive with our Board, 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 Board 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. As such, we will work to address any weaknesses or deficiencies that may be brought to light by the complaints we receive, and aim to communicate transparently about our 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.

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

**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.

**Accountable Now Board:** The Board guides the development of Accountable Now, makes all decisions regarding membership and oversees the work of the Secretariat.

**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 the work carried out by Accountable Now, its staff, Board, and the IRP and may relate to:

- Accountable Now’s compliance with the 12 Accountability Commitments
- Accountable Now’s compliance with our own policies, particularly our Code of Conduct
- The functioning of this feedback and complaints mechanism

Complaints not addressed by this policy

Accountable Now is not able to accept or look into:

- 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’s member organisations. For any concerns relating to our members, please see this statement.

5. Who may submit a complaint?

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

Complaints may be submitted anonymously. This may limit the extent to which we are able to respond to the complainant, particularly if contact details are not provided. However, we will make sure in all cases to take the information we receive into consideration and follow up internally as far as possible.

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

All complaints submitted via email will be received and reviewed by Accountable Now’s Programme Manager and will be shared with Accountable Now’s Executive Director.

Where there are potential conflicts of interest within the Accountable Now Secretariat or Board, an alternative staff or Board member will be appointed to deal with the matter.
On a monthly basis, the Secretariat will share information with the Board Chair on complaints received and actions taken to address them.

A summary of the complaint – without any information that could disclose the complainant’s identity – may also be shared with other Accountable Now staff and Board members for learning purposes.

7. Process for submitting complaints about Accountable Now

Submitting a complaint

Complaints may be submitted via email sent to feedback@accountablenow.org or by post addressed to:

The Membership and Reporting Manager
Accountable Now
Agricolastrasse 26
10555 Berlin, Germany

Submissions to the above email and postal address are received by the Programme Manager.

If the feedback or complaint relates to Accountable Now Secretariat activities or personnel, it should be submitted directly to Accountable Now’s Executive Director: rmlopez@accountablenow.org

If there is a serious complaint to make in regards Accountable Now Secretariat staff, it should be submitted directly to the Board Chair: ccuanachain@accountablenow.org

If the complaint relates to the Accountable Now Board, it should be submitted directly to the Chair of the Independent Review Panel: john.d.clark333@gmail.com.

When submitting a complaint, please provide the following information:

1. An explanation of the issue. If your concern relates to a specific Accountability Commitment, Accountable Now policy, or mechanism, please mention which one.
2. If your complaint relates to a specific member of staff, the Board, IRP, or other person affiliated with Accountable Now, it would be helpful for you to specify the person concerned; however, this is not mandatory.
3. Any steps you may have already taken in this regard, including previous correspondence with Accountable Now or any affiliated persons on this matter.

4. Whether you would like us to disclose your identity to those directly involved/mentioned in your concern when we are looking into the matter. If you do not specify, we will by default keep your identity confidential.

You may also submit a complaint in person directly to any member of Accountable Now’s staff. The staff member will record your complaint and share it with the Programme manager, who will take the matter further in line with the steps below.

**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:** We 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.

**Investigation and response:** We will investigate the complaint to assess whether it is well-founded, speak to any staff or other affiliated persons involved in the issue, and agree on a plan to respond to the issue.

During this period, we may reach out to the complainant (if contact information was provided) to request further information or clarification.

**Following up with the complainant:** We will share in writing with the complainant the outcome of the investigation of the complaint, including any actions we are planning to take in response, within a month after receiving the complaint.

**Appeals:** We take seriously the proper and fair functioning of our complaints handling process, and will look into any issues raised in this regard. Appeals will not necessarily result in a different decision, but if the complainant believes the complaint has not been handled fairly, they may take the issue to the Chair of Accountable Now’s Board: pmeier@accountablenow.org.

If the Chair of the Board was the one handling the original complaint, the complainant should contact the Vice-Chair.
Sharing information about complaints

**Informing the Accountable Now Board:** The Secretariat will provide the Board with a summary of complaints received, and the outcomes and actions taken in response, at each Board meeting.

**External transparency and learning:** We will publish annually on the Accountable Now website an overview of the number of complaints we have received, the broad category they related to, how many of these have been resolved, and what we have learned. We will not include specific information about individual complaints to ensure confidentiality for all parties involved.

**8. Review of this policy**

This policy was last reviewed and approved by the Board in November 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.