

Norwegian Refugee Council

Terms of Reference – Complaints and Feedback Mechanism: Institutionalisation in NRC

Introduction

The Norwegian Refugee Council (NRC) is an independent, humanitarian, non-profit, non-governmental organisation which provides assistance, protection, and durable solutions to displacement-affected persons.

NRC's 2022 – 2025 global strategy includes an objective to strengthen quality, accountability and learning in its response. This includes strengthening participation and engagement of the communities that NRC works within. A separate consultancy has been launched to provide strategic direction to NRC on community engagement and participation. Complaints and feedback, which is the focus of this consultancy is a sub-component of that work.

Complaints and Feedback Mechanisms (CFM) serves as a critical method for the communities that NRC works with (the people that NRC targets with its programmes, the wider community and suppliers) to hold NRC to account on its programme implementation and quality. Feedback refers to unsolicited opinions, criticism, praise, requests for support and/or suggestions communicated in a verbal or written form, through formal or informal channels. A complaint is a formal expression of dissatisfaction with the standards of service, actions or lack of action by NRC staff, or anyone directly involved in the delivery of NRC's work. Complaints are divided into three categories: 1) Service Complaints 2) Sensitive Complaints 3) Complaints on third parties:

The aim of this consultancy is to map the current status of implementation of the CFM policy in the organisation, identify gaps, and provide options for how to further institutionalise this work going forward.

NRC is looking for an experienced consultant with a technical background in institutionalising CFM into a large organisation to commence work in March 2022.

1. Background of CFM in NRC

In 2018, NRC approved a global policy on Complaints and Feedback Mechanisms (CFM). The main principles of the policy are Accessibility, Safety, Independent, Transparent and Responsive.

The policy sets out a number of minimum standards, including: that a CFM must be established in all COs, sufficient allocation of resources, contextually relevant feedback channels with input from the local community, accessible registration of feedback and

complaints (following data management standards), clear communication of CFM processes to communities, contextually and culturally appropriate channels, including specific child friendly and safe channels for children, staff awareness and engagement and lessons learnt and engagement.

This policy was accompanied by handbook to support its country offices to establish CFM, and some initial technical support from a roving Head Office (HO) staff member was provided to support a number of Country Offices (COs).

Since that time, a number of COs have established CFM in country. In addition, CFM has been identified as one of the minimum standards in NRC's Safe and Inclusive Programming (SIP) framework. However, there are a number of gaps in institutionalisation of the policy at all levels of the organisation:

1. Firstly, roles and responsibilities for leading on CFM is not clear/is not being implemented at all levels of the organisation.

CFM is housed between different departments, at different levels of the organisation (HO, RO and CO). The policy does set out some clear roles and responsibilities at different levels. However, there are gaps both in clarity and implementation of roles and responsibilities and across specific tasks as set out below:

CO Level

The CFM policy states that country directors are accountable for ensuring that a Complaints and Feedback Mechanism (CFM) is functional in their area. Heads of Programme (HoP) are responsible for establishing and managing the CFM at Country Office level, recruiting and appointing the staff needed to implement and maintain CFM. Responsibility for following up and utilising information for service feedback and complaints sits with teams responsible for delivering the area for which there is feedback or a complain at all levels (e.g. programme for programme complaints, or support functions when relevant). For sensitive complaints, follow up and investigation does not lie with staff or functions responsible for implementing and managing CFM, but should follow the internal reporting procedures (NRC Protect entry etc.).

The main unclarity at the CO level is around roles and responsibilities for implementation, for which there are different interpretations about where it should sit in the programme team – (programme, SIP, M&E). The policy and guidelines are flexible on this, but this is causing challenges in some Cos including in ensuring adequate resources. The current reality is that implementation at the CO level is falling onto one department: M&E in over 90% of COs. We need a better understanding of who should be leading the development and follow-up of different elements of the system and R&R across the various tasks.

HO level

HO is responsible for developing global guidelines, tools and minimum standards for all of the organisation's functions. According to the policy, at NRC Head Office, the Director of the Organisational Development Department is accountable for ensuring that a Central CFM is functional at a global level as well as being responsible for the

governance of the policy, and oversight of compliance with it. The policy states that the Strategic Planning and Development Section can offer further support to Country Offices on implementing this Policy. However, this role has fallen between the cracks in the past few years, with no HO function leading on the further development of the system.

HO M&E has not been responsible for CFM at any point since the unit was established. The global programme unit is responsible for safe and inclusive programming and programme development, quality and learning.

In addition, a Risk and Compliance Function has been established in NRC since the policy was developed. They play an important oversight role for all NRC risks and compliance to policies. The function is also responsible for investigating misconduct and receiver of related complaints (corruption, SEA, etc.: managing the anti-corruption e-mail and the PSEA e-mail, and from March 1st the Whistleblowing e-mail). Potential link to sensitive complaints.

Currently no function at HO is taking responsibility for the further development, implementation and technical support of the system.

RO level

Regional offices provide technical oversight, control and support to COs. However, for CFM, it is not clear who is supposed to provide technical support v. oversight to COs, and in general support sits between programme (including sometimes safe and inclusive programme staff), M&E and risk and compliance, with no current main focal point or clarity on who is supposed to do what. NRC currently has SIP advisors in three of four regions, but some of these are temporary positions for the next two years.

In summary, at all levels, there is a need to clarify:

- Who should be responsible for developing and leading the guidelines, establishing organisational standards, establishment and implementation of CMF systems at different levels?
- Who is responsible for rolling out and supporting on the guidelines - providing technical assistance and training to COs on CFM – which team and at which level of the organisation?
- Who is responsible for the supervision the implementation of CFM at CO level, and who should have regional oversight?
- Who should be responsible to periodically analyse/review CFM data at CO/RO/HO?
- Who should be establishing a centralised function?
- Should different functions be more/less involved for different types of complaints (e.g. service vs. serious – ref. also “speak up system” recommended by IA).

2. Secondly, there are a number of gaps in institutionalisation and development of guidelines

The policy remains partially rolled out. Right now it is not clear what is in place at CO levels, which of the minimum standards are being implemented and what is needed

from COs to achieve minimum standards, nor is there clarity on where we are with the global CFM system.

It is not clear what that should be/what the need is globally nor how it should link with other systems (e.g. whistleblowing system). Note that IA has recommended a “Speak up system” that could include the “complaints part involving staff misconduct” and whistleblowing as one system (ref. IA report on Whistleblowing and Investigations). Suggest maybe to rephrase this. It is about what a global system should be and how it will interlink with other reporting mechanisms.

Some gaps identified are:

- There is a weak system for analysing and reporting up data (currently limited to a tri-annual compliance questionnaire), NRC has no regional or global overview of the types of complaints or number of complaints we are receiving. Reporting requirements and definitions are not clearly defined.
- Limited system for monitoring the implementation of the policy’s minimum standards (NRC’s tri annual compliance questionnaire)
- Technical support and training for COs is missing
- Additional guidelines and standards (such as child/youth friendly CFM which was a recommendation from an internal audit) are missing
- Guidance on data sharing and management is not clear

Broadly speaking, it is fed back by RO and CO M&E staff that the guidelines mostly outline the what but not the how to of developing a CFM. This means that COs develop these things independently, but without organisational standards or oversight.

3. Thirdly, organisational ambition to institutionalise this policy and correspondingly the resources required to achieve this has been unclear/ or not a priority in recent years

NRC is committed to quality, accountability and learning. In its new global strategy, this is a main strategic priority, and includes the need to institutionalise and support better systems for CFM. However, it is not clear what is needed to implement and achieve those standards and objectives, and resources required. This is required to map out what resources/ positions are needed at all levels, how much time should be allocated at different levels.

2. Scope of work

Over 15 days’ work, the consultant is expected to accomplish the following objectives:

2.1. Mapping of CFM status in NRC today

The consultant will provide a mapping of CFM practices in COs

- How is it being implemented – what is working well and challenges. This will not include a detailed review of practices at the CO level, but broad overview of which Cos have systems, what they have in place, what they are doing well, what they are struggling with.
- A breakdown of tasks at the CO level and who is doing what
 - Setting up the system
 - Administering/implementing the system
 - Following up on feedback/complaints
 - Technical support on CFM
 - Accountable for overall implementation
 - Compliance checks for CFM
- Resources for CFM at the CO level, against the key tasks:
- Support needs for COs

And a mapping of institutional investment, support and implementation from HO and RO

- What do we have in place (organisational guidelines and tools)
- What are we doing to institutionalise the policy at HO and RO level?
- What technical support is being provided to COs
- Gaps in policy expectations at HO and RO levels

2.2. Case studies of similar organisations (size, purpose etc)

- How is this managed and arranged in two other similar humanitarian organisations, in line with the questions set out in this TOR – R&R for CFM, resources invested at different levels etc.

2.3. What do we need to do to further institutionalise this work going forward? Provide options for senior management decision making round:

- Who is responsible for leading the development on CFM at all levels, who is responsible for the technical support as well as other R&R for implementing at HO, RO and CO levels? Please note that NRC is also doing a broader consultancy to establish a framework for community engagement, which will also look at options for R&R. This should build on that thinking as much as possible.
- What should the organisation prioritise in the next four years in terms of institutionalising the CFM policy and handbook – offering a phased approach
- What resources are needed at all three levels to achieve this?

3. Suggested methodology

- Desk review of key documents, guidance and tools related to CFM
- A simple survey to gather 'broad, overview data'
- Case studies of two similar organisations and how they have structured CFM

- Remote workshops with a sample of implementers of CFM at the CO level to address each of the questions outlined above
- Interviews with key informants from NRC Country Offices, Regional Offices and Head Office.
 - Group interview with regional M&E staff
 - Interview with Head of Risk and Compliance and Global Risk Advisor
 - Group interview with regional SIP advisors
 - Further interviewees to be identified
- The consultant will work closely with NRC Global Programme Strategy and Innovation Director and the Global Head of Monitoring and Evaluation, who will convene a small NRC reference group for the consultancy

4. Deliverables

- Brief inception report, following on from desk review
- A report, with executive summary, that covers the topics outlined in section 2, with findings and clear recommendations and the key decisions to be taken by senior management.
- A PowerPoint presentation, to be used in a meeting with the commissioning managers and Global Programmes Section, risk and compliance and directors of OD and FO, summarizing the main findings and recommendations, and available for additional presentations as needed.
- Travel is not expected and the entirety of the consultancy can be conducted remotely from the consultant's residence.
- A workshop to discuss findings and recommendations with key decision makers

5. Required Skill Set

An experienced humanitarian practitioner with a demonstrated expertise institutionalising, implementing and developing CFM in humanitarian settings, with a minimum of ten years of relevant work experience.

A clear understanding and appreciation of the specific organizational mandate, context and scope of NRC, as a leading humanitarian INGO working with people affected by displacement and, as such, not in a public health or natural disaster context. This does not preclude consultants from having a background in public health or natural disaster response, but it does mean that they need to be able to adapt their thinking in line with NRC's mandate and strategy.

The expected start date for the consultancy is Mid-March 2022, with all work to be completed by Mid-April, 2022.

In addition to the above, the following skills and qualifications are required:

- Experience in developing, institutionalising and implementing CFM within a humanitarian organisation
- Experience with humanitarian organisational change & strategy development processes

- Strong written and verbal presentation skills in English, French and Spanish an advantage
- Ability to articulate technical complexities to senior decision makers
- Experience reviewing complex institutional arrangements and understanding avenues for systems change
- Comfortable operating in the initial phases of a project, where objectives and deliverables are iterative
- Experience working remotely with minimal supervision, but with strong personal drive and communication skills needed for coordinating multiple moving pieces of work
- Strong understanding of the humanitarian INGO context. Prior knowledge of NRC desirable but not required
- At least ten years of experience implementing humanitarian programmes, five years of which should have been working directly with displacement-affected people.

6. EXPRESSION OF INTEREST

Expressions of interest are requested with the following information:

- Cover letter elaborating competency against expected qualifications and scope of work (where multiple team members, please elaborate on who will be involved/leading each piece)
- Background of individual (s) proposed for project
- Proposed number of days work and daily rate

Expressions of interest should be e-mailed to tariq.riebl@nrc.no, lian.bradley@nrc.no and giovanna.federici@nrc.no by 7th March 2022.