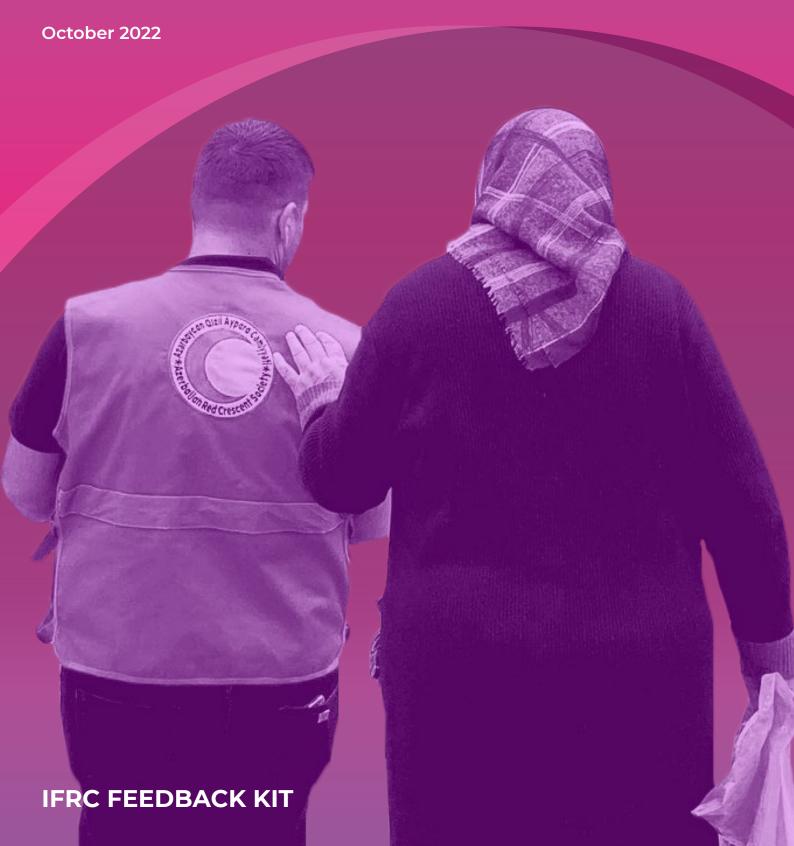


MODULE 5

HOW TO HANDLE SENSITIVE FEEDBACK

A quick guide to identifying and referring sensitive feedback in a safe and efficient way





Navigating this guide At a glance: How to handle sensitive feeback 6 What is sensitive feedback? 8 How to prepare for sensitive feedback 10 Raise awareness and build trust in the system 15 Investigating and responding to concerns 16 Additional resources 17 Glossary of terms 18 Acknowledgements 19

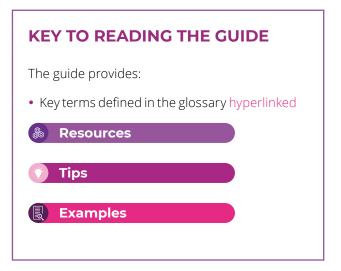
Libya 2022 — A survivor onboard the Ocean Viking, a humanitarian search-and-rescue ship, the day after being rescued by SOS Mediterranee and IFRC teams. © Annalisa Ausilio/IFRC



NAVIGATING THIS GUIDE

What is this document?

This module of the IFRC Feedback Kit provides guidance on how to ensure a community feedback mechanism can safely and appropriately handle sensitive feedback. The module should be used together with the other modules of the Feedback Kit. An overview of the kit can be found here. This document does not cover any sort of incident monitoring or measurement of the incidence of events. However, incidents may be reported through a feedback mechanism and should be linked to such efforts.



Who is this document for?

This document is for anyone involved in managing a feedback mechanism, no matter how the feedback data is collected and no matter how big or small the scale of the mechanism is.

How to read this document?

The overview on the next pages helps you to quickly identify what part of this guidance might be most relevant to your situation. It lays out each section of the module, what is included in that section, who should prioritise reading it, and an overview of the different resources provided (with embedded links to the sections and resources). The resources are distinguished between:



Guidance documents text that outlines advice, key concepts,

and best practices



Toolsresources that you can fill out to help you make decisions



Templates samples of tools that you can use in a real-life implementation of a feedback mechanism, all of which can be modified to fit your organisation's specific context and needs

ABBREVIATIONS AND ACRONYMS

CEA Community Engagement and Accountability¹

IFRC International Federation of the Red Cross and Red Crescent

IBV Identity-based violence

GBV Gender-based Violence

OIAI IFRC Office of Internal Audit and Investigations

PGI Protection, Gender and Inclusion

PSEA Prevention of Sexual Exploitation and Abuse

RCRC Red Cross Red Crescent

SDC Statistical Disclosure Control

SEA Sexual Exploitation and Abuse

SGBV Sexual and Gender-Based Violence

SOP Standard Operating Procedures

Community Engagement and Accountability (CEA) describes the process of working in a transparent and participatory way with communities that improves the quality of programmes and operations. It can be used interchangeably with Accountability of Affected People or Populations (AAP).

AT A GLANCE: HOW TO HANDLE SENSITIVE FEEBACK

Overview of content and resources

WHAT IS SENSITIVE FEEDBACK?		
Content includes	Who should read this?	
Overview of what we mean by sensitive feedback and the different types of it	Anyone who is involved in feedback mechanisms and needs to be able to identify sensitive feedback to ensure it is handled appropriately	
HOW TO PREPARE FOR SENSITIVE FEEDBACK		
Steps to take:	Who should read this?	
 Ensure there are safe and trusted channels for sharing sensitive feedback Map out focal points and services Ensure safe and efficient referral pathways Set up safe systems Train the feedback team Ensure sufficient support for staff and volunteers receiving sensitive feedback 	Anyone who is involved in setting up or strengthening a feedback mechanism	
Resources include:	What is this resource for?	
Feedback tool 33: Steps to take when receiving sensitive feedback	This short step-by-step document guides anyone in contact with community members to safely and appropriately identify and refer sensitive community feedback	
Feedback tool 34: Template for mapping out focal points and services	This table can be used as a template for mapping out all contacts for your referral pathways	

RAISE AWARENESS AND BUILD TRUST IN THE SYSTEM		
Steps to take:	Who should read this?	
 Build trust in the system Train all staff and volunteers on sensitive feedback Raise awareness of sensitive issues within communities Normalise and support a culture of accountability 	Anyone who is supporting the set-up of the feedback mechanism, as well as management and leadership	

INVESTIGATING AND RESPONDING TO CONCERNS		
Content includes	Who should read this?	
An overview of who is expected to investigate a sensitive concern and where to get help to do so	Anyone who is involved in addressing community feedback	
ADDITIONAL RESOURCES		

ADDITIONAL RESOURCES	
Content includes	Who should read this?
Links to related additional resources	Anyone who needs additional references and resources

WHAT IS SENSITIVE FEEDBACK?

Sensitive feedback is any information shared by community members that can put them or other people linked to it at-risk and needs to be handled with care. It can relate to any breaches of national or international law concerning communities' safety, dignity and rights, or any violation of our own code of conduct or safeguarding policies.



Sensitivity is contextual

It is always the person sharing feedback who decides if an issue is sensitive or not. Though seemingly nonsensitive to the receiving organisation, individual or personal circumstances may make the case sensitive. For instance, in some societies, the mere fact that a woman voices a complaint could jeopardise the honour of her family or her safety, even though the issue does not appear to be sensitive from the agency's perspective.

Sensitive feedback can be divided into two categories:

1. Protection concerns in the community, including but not limited to:

- Identity-based violence (IBV)² Any act of violence by individuals, groups, or societies based on actual, perceived, or ascribed aspects of an individual's identity such as gender, ethnic origin, nationality or citizenship, age, disability, language, political opinions, religious beliefs, social background, sexual orientation, physical appearance and colour. It can also occur due to unsafe programming, e.g., by not providing lights and inside locks of toilets and bathrooms.
- Corruption by community members or leaders when members of the community abuse their position of power for their personal gain. For example, when a community leader asks for a bribe from community members for them to be able to access a service or assistance, or when they do not pass on feedback from the community to aid organisations.
- Security threats either alerts of security threats in the community or direct threats made to the Red Crescent and Red Crescent and its staff and volunteers.

^{2.} Identity-based violence includes sexual and gender-based violence (SGBV)

2. Concerns about the behaviour of Red Cross and Red Crescent staff and volunteers, or persons associated with other humanitarian organisations, including:

- Sexual Exploitation and Abuse (SEA) a form of IBV where staff or volunteers take advantage of somebody's vulnerable position, for example, by asking for sexual favours in exchange for aid, buying sexual services, or engaging in other exploitative sexual behaviour.
- Breaches of child safeguarding policies situations where children are exposed to adverse impacts, including the risk of violence, abuse, exploitation, or neglect. For example, when they are not separated from men they are not related to in shelters, exposed to humiliating and degrading
- treatment, or forced to work instead of going to school.
- Corruption staff or volunteers are abusing their position of power for their personal gains, for example, by asking someone for a bribe (often money) before letting somebody access a service or aid, using aid goods for their private use, or adding family members to the list of aid recipients.
- Any other serious breach of our Code of Conduct, such as discrimination on the basis of race, gender, religion, sexual orientation, disability, age.

Safeguarding, feedback, and accountability are intrinsically linked. It involves people holding organisations accountable for their commitments to do no harm and act with integrity. This includes the behaviour of personnel but also failing to ensure the safety of the people aimed to serve (i.e., failing to build awareness, reduce the risks, or provide support to

survivors). A vital part of any safeguarding process is having processes for affected people to raise concerns and complaints or give feedback about how those projects or personnel have harmed them.



HOW TO PREPARE FOR SENSITIVE FEEDBACK

Sensitive feedback could be shared through any channel, no matter if the channel was set up to handle this kind of information or not. It can be received through a formal feedback mechanism such as a hotline, but might as well be shared with a driver or a volunteer during a household visit. It is vital to ensure that there are systems in place to share sensitive feedback with those in the position to handle it, to keep the information safe, and to provide staff and volunteers with knowledge about what is expected from them. IFRC is required to receive and refer any

sensitive feedback. It is not an option to not record it or not tell someone with responsibility to act. Inaction can cause or perpetuate harm, which is our core humanitarian mandate to avoid.

The steps for setting up a feedback mechanism are described in the <u>Module 2 - Feedback Essentials</u> of the IFRC Feedback Kit and refer to both sensitive and nonsensitive feedback. Below are the key considerations to ensure systems are ready to handle sensitive feedback.



Important

Handling and investigating sensitive feedback require specialized training and skills. It is not the job of the staff or volunteers to search for evidence or find solutions on their own when they receive sensitive feedback. Their only responsibility is to report the concern. Procedures need to be developed for each National Society or office, which describe how to escalate

sensitive feedback to the designated focal points with the necessary background and authority to decide on the next steps. Separation of duties and complete confidentiality must be observed at all steps of the process, and the protection of the person sharing the sensitive feedback and other people involved must have the highest priority.

Ensuring a survivor-centred approach

A survivor-centered approach must be followed at all times. This means upholding the following principles, which can guide the actions of any staff and volunteers when being confronted with such cases:

Confidentiality: People have the right to choose to whom they will or will not tell their story. No information is shared with anyone without the informed consent of the person concerned.

Safety: The safety and security of the survivor must be the number one priority for all actors.

Respect: The survivor is the primary actor, and the role of helpers is to facilitate recovery and provide resources for problem-solving.

Non-discrimination: Survivors of violence should receive equal and fair treatment, regardless of their age, gender, race, sexual orientation, religion, nationality, ethnicity or any other characteristic.

Ensure there are safe and trusted channels for sharing sensitive feedback

Make sure to discuss with people of all genders, ages, and abilities, if they understand what sensitive feedback is, if they know how to report it and which channels are available to do so, if they feel safe to report and use these channels, and if there are better ways to share these concerns. Channels for putting feedback, including sensitive feedback, forward should extend beyond those directly targeted by our activity to include other community members, partners, suppliers, institutions etc.

Whenever possible, feedback mechanisms should be set up to handle both sensitive and non-sensitive data. This avoids confusion about channels, increases accessibility and avoids stigma linked to the use of specific channels. Community members should be able to use at least one channel that allows them to share their feedback in a confidential way (without other people listening in on the conversation, for example, via phone call or text message). As soon as something is flagged or reported as sensitive, it needs to be filtered out of the general data pool and stored separately and made available to only those with the training and responsibility to act. A safeguarding mechanism is far more likely to be successful if placed against the backdrop of a broader feedback mechanisms as this help to establish the trust needed for safeguarding concerns to be raised.

Clarify responsibilities

The roles and responsibilities for handling the different types of sensitive feedback need to be clear to everyone and should be included in the document

outlining roles and responsibilities. See more on this in Stage 1 in Module 2 - Feedback Essentials.

The role of general staff and volunteers receiving sensitive feedback is strictly limited to:



The role of general staff and volunteers receiving sensitive feedback is NOT to:



- Identify sensitive feedback and listen and provide psychological first aid when needed
- Ask for consent to record the information and explain what will happen next and that the information will be treated confidentially
- Ask for consent to refer the person for services, share clear, up-to-date information on available services, and the survivor make their own choices
- Record and acknowledge
 Sharing information on the next steps and the expected timeframe for hearing back (if the feedback was received in person)
- Escalate and refer

 Sharing the information with the right focal point through a safe channel

- Actively seek SGBV survivors as is only the survivors who can decide when, how and to whom they disclose their experience
- Understand the details as the investigation will be led by trained experts who will clarify the details and check the facts
- **Provide counselling** as this needs to be handled by those with the right training
- **Give their own opinion**, they should provide a listening ear without judgement
- Make false promises as the next steps will be taken over by those familiar with the process.



Feedback shared by a third person

If a case of identity-based violence (such as sexual and gender-based violence) is shared by someone other than the survivor, or if there are rumours in the community, make sure to share up-to-date and accurate information about any available services

and support. Encourage the individual who shared the feedback to share this information safely and confidentially with the survivor. BUT DO NOT SEEK **OUT THE SURVIVOR**

The relevant focal points are responsible for:

- Acknowledging feedback: notifying the feedback provider that their sensitive feedback was received (if not taken in person).
- Holding an in-person complaint intake where possible (e.g., in-person interview with the child or adult).
- Undertaking appropriate follow-up actions, including external referral for reporting if the feedback relates to another organisation, and external referral for services, If the survivor agreed to that.

Map out focal points and services

When setting up any feedback mechanism, it is essential to know the assigned focal points to deal with the different types of sensitive feedback. You might have different focal points responsible for issues related to IBV, SEA, other code of conduct breaches, or security, or your leadership will take on this responsibility.

If there is unclarity on who the focal point for a specific type of sensitive feedback is, support the process of assigning one. In the absence of a focal point, the sensitive feedback can always be shared with the line manager, senior leadership, an HR representative, IFRC's whistle-blower system (currently known as "Integrity Line"), or the IFRC Office of Internal Audit and Investigations (OIAI).

In case of violence or other specific needs, there can be the need to refer the affected person to specialised services. This can include medical, psychological, or legal support, specialised support for LGBTQI+, persons with disabilities, and more. There might also be other feedback mechanisms you should be aware of to be able to refer feedback cases. When mapping the relevant services and feedback mechanisms, do a background check before referring any cases to ensure they are functioning and it is safe to refer information and people³.

Following resource can help you to map out the focal points, services, and relevant mechanisms:



Resource

Feedback tool 34: Template for mapping out focal points and services



Ensure safe and efficient referral pathways

A referral pathway is a flexible mechanism that safely links those sharing community feedback to supportive and competent services in a timely way. It needs to be developed jointly between CEA and PGI colleagues as it essentially connects these areas of responsibility. Feedback cases might be referred to other mechanisms better equipped to address the feedback, or to internal and external focal points responsible for addressing the specific type of feedback.

The SOPs of the feedback mechanism need to describe under which circumstances a feedback case may require a referral, in addition to when and to whom it is referred, and the commitment to respond to this

^{3.} This background check will be done by your protection, gender and inclusion colleagues or in coordination with them.

referral within the desired time frame (even if that response is, "we're working on it!"). The feedback case is transferred in a way that only the pre-identified focal point can have access to the information.

When sensitive data is shared outside the organization, a data-sharing agreement must be in place. This can be ad hoc bilateral agreements with other organisations

on how to share and handle the specific case, as well as pre-emptive agreements on sharing and referring feedback relating to the concerned organisations. Sharing is limited to the minimum necessary to fulfil the specified, legitimate purpose(s) and is done only with the informed consent of the person concerned.

Set up safe systems

Feedback processes and tools are set up in a way to ensure that

- sensitive data will be transferred and stored in a manner that renders it accessible only to persons with the required access authorisation, in line with the relevant information-sharing protocols and SOP.4 Sensitive data will only be received through secure and encrypted file transfer services or shared directly with the relevant focal points in a way with the lowest risk of exposure tailored to the specific context.
- no more than the minimum necessary information to refer the feedback to the responsible focal point is recorded.
- for sensitive feedback or upon request, a confirmation of receipt is provided, including how much time it will take to hear back and a focal point for follow-up.
- whenever data are shared publicly, ensure there is no personal information and other sensitive information included, and statistical disclosure control (SDC) was applied.⁵

Train the feedback team

Only trained staff should be responsible for the overall management and handling of feedback received through formal feedback mechanisms. The feedback team needs to be trained on identifying, recording, and referring sensitive feedback, PSEA, IBV, and broader protection concerns, data protection, privacy and informed consent, referral procedures,

how to adequately deal with people presenting with mental health challenges, and psychosocial first aid. These trainings need to be organised in conjunction with your PGI colleagues (who may or not be present where you work) and PSEA focal point (which should be mandatory in all IFRC offices).

Ensure sufficient support for staff and volunteers receiving sensitive feedback

Adequate support must be provided to the team managing a feedback mechanism and regularly receiving sensitive feedback. They must be able to influence their working environment and evaluations of the feedback mechanism as key operational

stakeholders and individuals with their own rights to feedback. It needs to be ensured they have the necessary training, supervision, debriefing, and mental wellbeing support available.

^{4.} See more on protection of personal data here: IFRC (2020) Data Protection policy https://www.ifrc.org/document/IFRC-Data-Protection-Policy

^{5.} See more on SDC here: The Centre for Humanitarian Data (2019) *Guidance Note on Statistical Disclosure Control*. https://centre.humdata.org/guidance-note-statistical-disclosure-control/

The following resource helps you to train your staff and volunteers on handling sensitive feedback and can serve as a reference document:

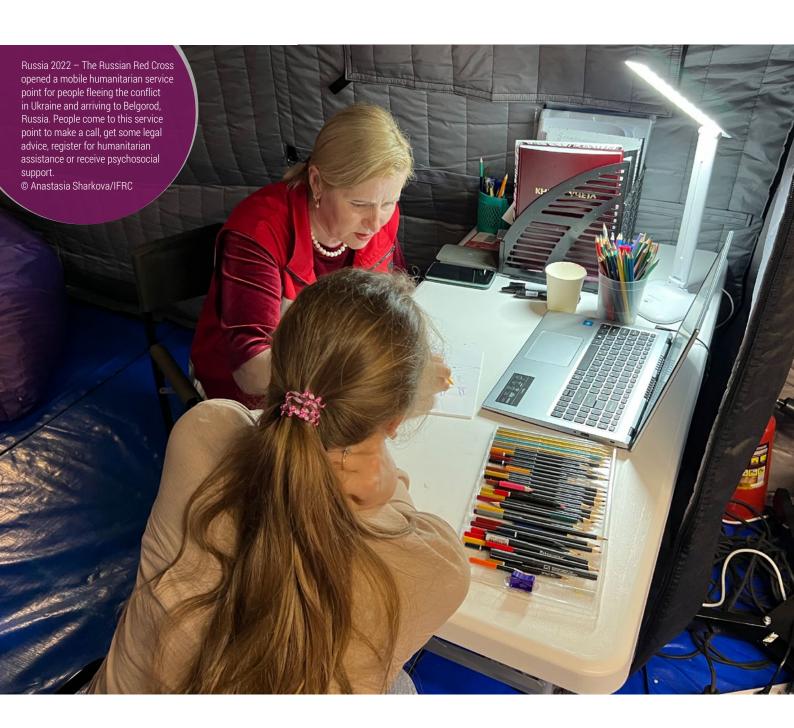


Resource

► Feedback tool 33: Steps to take when receiving sensitive feedback







RAISE AWARENESS AND BUILD TRUST IN THE SYSTEM

Build trust in the system

For community members to share sensitive feedback through a feedback channel, they need to trust the process and its people. Trust in the feedback mechanism can be gained by being transparent about the process and showcasing how both sensitive and non-sensitive feedback is managed efficiently. Communicate how feedback is discussed and

addressed, how community members are involved in the process and hear back on the outcomes of the feedback process. Investigation procedures are clearly documented, shared, and understood by those likely to raise concerns to build trust in the investigation process – this is especially important since it is often during this stage that trust is lost.

Train all staff and volunteers on sensitive feedback

All volunteers and staff need to be trained to identify sensitive feedback comments and take the necessary next steps. This applies to all staff and volunteers, not only those involved explicitly in feedback mechanisms, and should be part of the Code of Conduct briefing. Everyone needs to be aware that it is not up to them to investigate the case, understand the details of the situation or provide counselling. Be mindful of staff turnover over time and ensure trainings and briefings are repeated regularly.

Raise awareness of sensitive issues within communities

The terms we use to describe sensitive issues, such as sexual exploitation and abuse, sexual and gender-based violence, or corruption, are often not adequately translated into local languages. They are therefore often not fully understood by staff and volunteers and hence even less by community members. An effort

must be made to develop appropriate translations for local languages and to discuss these terms and their meaning with staff, volunteers, and community members. Everyone needs to be clear on what kind of behaviour is expected from RCRC staff and volunteers and how concerns can be reported.

Normalise and support a culture of accountability

There needs to be open communication about the process of handling sensitive issues. While protecting any information about people affected, it is still essential to communicate about steps and the process transparently. It needs to be showcased that the system is working. This can for example be done by reporting

how many sensitive cases were handled, referred and what consequences this had. Communication about incidents should not be characterised by shame, as it shows the system is working and equipped to handle cases.

INVESTIGATING AND RESPONDING TO CONCERNS

Investigations need to be carried out by qualified, objective investigators with professional training and experience conducting such inquiries. IFRC can provide support investigations and response on a case-by-case basis when:

- a clear policy or procedure is lacking;
- a conflict of interest has been identified;
- or a survivor is deemed to be at risk, including the risk of harassment or threats because of the report.

Partner National Societies may also be able to provide guidance and support for this step, for example, via a PSEA or HR adviser.⁶

In some contexts, when incidents of misconduct such as theft, fraud, corruption or SEA constitute a criminal offence, it will be the decision of the national society or office's leadership to refer cases to the relevant law enforcement authorities in line with internal procedures appropriate for the country context. The decision to refer a case to the national authorities must consider the consent of the survivor/complainant, who may not wish to do so. It is the responsibility of the feedback manager and focal points to be up to date on relevant national laws and to incorporate them into referral procedures and information packages for survivors/complainants as appropriate.



^{6.} To request support in this area, reach out to your IFRC PGI focal point who will assist you in getting the support you need.

ADDITIONAL RESOURCES

- IFRC PGI minimum standards in emergencies guide and toolkit
- IFRC Protection, gender and inclusion policy
- IFRC Safeguarding resources, including:
 - **凶** IFRC Global Safeguarding Action Plan
 - IFRC PSEA Policy
 - **☑** IFRC PSEA Manual
 - ☑ IFRC Staff Code of Conduct
 - **Y** IFRC Child Safeguarding Policy
- IFRC Policy on the Protection of Personal Data
- IFRC video on safe referrals of SGBV cases
- IFRC CEA Toolkit Tool 10: Code of Conduct briefing
- IASC Best Practice Guide on Inter-Agency Community-Based Complaints Mechanisms
- <u>IASC GBV Pocketguide</u> How to support survivors of gender-based violence when a GBV actor is not available in your area



GLOSSARY OF TERMS

Below are the definitions for critical terms used throughout this document.

Identity-based violence

Is any act of violence by individuals, groups or societies based on actual, perceived or ascribed aspects of an individuals' identity. Identity-based violence is facilitated and exacerbated by structures, norms, and laws that condone or promote (explicitly or tacitly) discriminatory attitudes and practices.⁷

Prevention and response to sexual exploitation and abuse (PSEA)

Policy, rules and actions intended to prevent IFRC Personnel from engaging in any form of sexual exploitation and abuse and to respond where it has occurred.8

Protection

Refers to keeping people safe from harm. It aims to ensure that the rights of individuals are upheld by preserving the physical, psychological, and emotional safety, integrity, and dignity of those at risk of, or affected, by violence, discrimination, and exclusion.⁹

Safeguarding

For the IFRC network refers to our responsibility in acting to keep people safe from any form of harm caused by the misuse of power by making sure that our staff, volunteers, programmes, and communications do no harm to children and adults, nor expose them to abuse or exploitation. Safeguarding also includes protecting staff from harm and inappropriate behaviour such as sexual harassment.¹⁰

Sensitive feedback

Any information that can put the person sharing it or other people linked to it at risk and needs to be handled with care. 11 This involves any allegation related to serious violations of national or international law pertaining to the rights of the individual; any breach of the code of conduct or safeguarding policies; and/or safety and security threats targeting the humanitarian community. 12 Sensitive feedback can be received as any type of feedback, such as a complaint, a question, or a suggestion as it depends on the specific situation if it puts a person at risk if shared with others.

Sexual and gender-based violence (SGBV)

Categories that include, but are not limited to, sexual violence, intimate partner violence, trafficking, forced/early marriage, sexual harassment, forced prostitution, femicide, female genital mutilation, sexual exploitation and abuse, and denial of resources, opportunities and services.¹³

Violence

The use of force or power, either as an action or omission in any setting, threatened, perceived or actual against oneself, another person, a group, a community that either results in or has a high likelihood of resulting in death, physical injury, psychological or emotional harm, maldevelopment or deprivation.¹⁴

- 7. IFRC (2022): Protection, Gender and Inclusion Policy. https://www.ifrc.org/document/protection-gender-and-inclusion-policy
- 8. ibid
- 9. ibid
- **10.** ibid
- 11. Inter-Agency Standing Committee (2021). Data Responsibility in Humanitarian Contexts. Operational Guidance, p.30.
- https://interagencystandingcommittee.org/operational-response/iasc-operational-guidance-data-responsibility-humanitarian-action
- 12. Danish Refugee Council (2022): Community Feedback Mechanism. Guidance and Toolkit., p.8. https://www.drc.ngo/media/vzlhxkea/drc_glo-bal-cfm-guidance_web_low-res.pdf.
- 13. IFRC (2022): Protection, Gender and Inclusion Policy. https://www.ifrc.org/document/protection-gender-and-inclusion-policy
- **14.** ibid

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