

ACCOUNTABILITY, FEEDBACK & COMPLAINTS MECHANISMS IN HUMANITARIAN RESPONSES TO MIGRATION

Clea Kahn / June 2020



THE MIGRATION EMERGENCY RESPONSE FUND (MERF)

The MERF is a context-specific contingency fund operated and managed by the Start Network and its 24 member NGOs, with the support of the Department for International Development (DFID). The MERF operates in 11 countries in North, West, and Central Africa: Algeria, Burkina Faso, Cameroon, Chad, Egypt, Libya, Mali, Morocco, Niger, Sudan, and Tunisia.

The MERF's purpose is to address needs not covered under ongoing mixed migration responses through short-term humanitarian interventions. It aims to rapidly respond to acute or emerging gaps and changes in need or vulnerable groups along the migration route in Africa, while the overall response system adjusts and adapts to new needs. It also aims to improve understanding of migration trends.

This piece of work was commissioned by the MERF in response to a challenge in adapting feedback and complaints mechanisms to mixed migration contexts, which was identified by members of the MERF as well as of the wider Start Network in the course of their operational work.

The author would like to thank everyone who gave generously of their time to contribute to this document, often during very difficult and stressful circumstances. Particular thanks are due to those whose lived experience of migration has helped inform this guidance.

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| INTRODUCTION

WHY THIS GUIDANCE?

Accountability to affected people is at the heart of humanitarian action. Accountability cannot exist unless organisations create the space and opportunity for people to provide feedback about programmes and services, or to complain about its quality, relevance, and timeliness, or the respect and dignity shown in its delivery.

As obvious as this may seem, it is not always easy to deliver. The often chaotic character of humanitarian contexts and the profound power disparities between service providers and affected people means that extra efforts must often be made to ensure people feel safe and empowered to specify what they need, and to demand better if it is not delivered.

This can be particularly challenging when people are moving rapidly from one region or country to another. In recent years humanitarian actors have been increasingly called upon to provide assistance in contexts of mixed migration, notably in West Africa, in the Americas, and in Europe. They have seen that needs and vulnerabilities of people on the move are different from people in more static contexts like camps for refugees or internally displaced people (IDPs), and also change more frequently and substantially. This can create additional challenges in engaging people in initial discussions or to follow up with them after they have used services.

Unless otherwise identified, all quotes and examples in this document come from interviews with the humanitarian organisations mentioned above.

Excellent guidance (see page 31) already exists on how to implement feedback and complaint mechanisms in humanitarian contexts, and this is not intended to replace or duplicate those. It should be read as a supplement, to provide additional reflection for humanitarian actors working in migration contexts.

STRUCTURE OF THE GUIDANCE

The first part of the guidance provides an overview of accountability to affected people and where feedback and complaints mechanisms fit. It outlines some of the challenges of migration contexts.

The second part of the guidance highlights the lessons learned by organisations implementing feedback and complaints mechanisms in migration contexts and some of the best practice identified.

METHODOLOGY

The development of this guidance was based on a review of existing literature, including research studies, guidelines and training materials. More than 30 interviews were conducted with representatives of more than 20 organisations working in Africa, the Americas, the Middle East and Europe. Particular support was received from Start Network's MERF member organisations.

SECTION 1

UNDERSTANDING FEEDBACK AND COMPLAINTS IN MIGRATION CONTEXTS



II UNDERSTANDING FEEDBACK AND COMPLAINTS MECHANISMS

CORE HUMANITARIAN STANDARD 4:

Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.

CORE HUMANITARIAN STANDARD 5:

Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.

ACCOUNTABILITY TO AFFECTED PEOPLE

This guidance focuses on the challenges of implementing feedback and complaints mechanisms in migration contexts. However, this technical issue is part of a bigger humanitarian commitment to accountability to people in crisis.

In 2016 at the World Humanitarian Summit humanitarian actors committed to a 'Participation Revolution', putting the needs and interests of people affected by humanitarian crises at the core of humanitarian decision-making.¹ This commitment is also articulated in the Core Humanitarian Standard.

While this guidance focuses on the details of implementation, this should be put in the context of the broader principle of accountability to affected people, which should permeate organisational culture and approach.

FEEDBACK, COMPLAINTS AND SERIOUS COMPLAINTS

Feedback and complaints are critical in ensuring an organisation and its programmes are accountable to the people they assist, the communities around them, and their own staff and volunteers. They serve different purposes, with feedback giving more general information about how people have experienced services, staff or systems, and complaints systems allowing for the expression and follow up of specific grievances. These can be about the quality, quantity or delivery of services, but can also be about more sensitive issues, including inappropriate, unethical or illegal activities.

Many countries and societies simply have no culture of complaint, and migrants may be particularly reticent to complain, often not perceiving themselves as having a right to the assistance they receive. Many organisations

ACCOUNTABILITY MECHANISMS AIM TO:

● TAKE ACCOUNT

Ensure that both migrants and the communities they travel through have meaningful influence over programme decision-making in a way that is inclusive and non-discriminatory and allows for the voices of the most vulnerable to be included.

● GIVE ACCOUNT

Ensure that crisis-affected people are aware of their rights and entitlements, and that agencies are transparent and clear about who they are, how they work, and what they can and cannot do.

● BE HELD TO ACCOUNT

Affected people should have the opportunity to assess what agencies are doing and how they are providing assistance, to provide feedback that is meaningfully considered and incorporated, and to sanction abuses and poorly delivered assistance, wherever possible. This means that people should also be informed about how agencies have responded to their feedback.

¹ IASC, *Recommendations that promote effective participation of people affected by crisis in humanitarian decisions and incentivise participation as a way of working for GB signatories, January 2017* interagencystandingcommittee.org/system/files/final_participation_revolution_workstream_recommmendations.pdf

avoid the word ‘complaint’, and recommend consultation to identify the word that resonates most with the affected group(s). Organisations in West Africa and Central America stressed that even with this approach it is often difficult to get the constructive criticism they require to adapt their programmes to migrants’ needs.

Both feedback and complaints must be acknowledged and responded to, but complaints require a more formal response.

Feedback can be collected in a variety of ways. It can be actively solicited through interviews, focus groups and surveys, or reactively collected using tools such as physical or electronic (email) suggestion boxes and hotlines. It is important to use a combination of active and reactive tools. Some advantages and examples of each type are included in Figure 1.

Feedback may be collected formally face-to-face, by telephone or email, or using tools such as suggestion boxes. Feedback can and should also be collected informally. This might be conveyed directly through comments made at the point of service delivery, or indirectly, e.g. through word of mouth or by uptake/lack of uptake of services. Either way, it should be recorded and actioned.

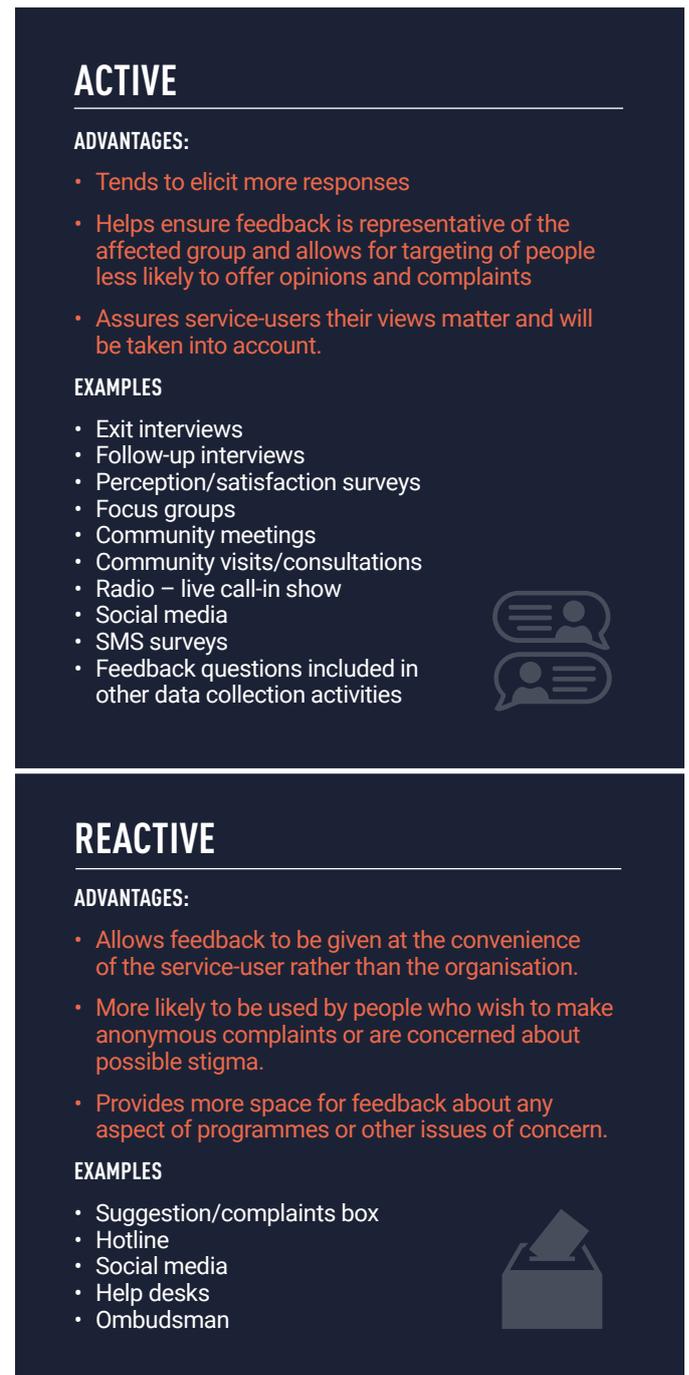
It is important to make a distinction between sensitive and non-sensitive complaints:

- *Non-sensitive complaints typically relate to programmes, and often capture concerns about who is targeted and why, or quality of products and services, for example.*
- *Sensitive complaints relate to issues such as exploitation, abuse or harassment, including sexual exploitation and abuse, discrimination, corruption, and fraud, among others.*

Feedback, non-sensitive complaints and sensitive complaints may arrive through the same channels, but must be processed differently. Programme staff must not act as gatekeepers for complaints, and complainants’ concerns and information must be handled sensitively and confidentially. This is particularly true for sensitive complaints about the conduct of staff or volunteers.

While the channelling and processing of feedback and complaints is very important, it is also very well covered in other pieces of guidance (see page 31) and the principles in migration contexts are not fundamentally different from other, more static, crises.

FIGURE 1:
ACTIVE AND REACTIVE MECHANISMS



SERIOUS COMPLAINTS AND INTERAGENCY MECHANISMS

Addressing exploitative and abusive behaviour has long been neglected in the humanitarian sector. There remains a great deal to do, but there has been an encouraging increase in efforts to provide service users with the opportunity to raise concerns, and to address these concerns in a timely and appropriate way. Feedback and complaint mechanisms are key to this process.

One innovation has been the arrival of interagency reporting mechanisms,

which channel and follow up complaints on behalf of a number of organisations and agencies. These mechanisms are systems, rather than specific tools, serving to channel feedback from a variety of sources, including feedback channels 'owned' by different organisations. However, sometimes a shared tool will be established in locations where multiple organisations are working – a hotline, for example, or a suggestion box in a camp, asylum centre, or at a humanitarian service point.

In 2019 such a mechanism was trialled for the first time across borders. The regional project in the Americas was launched in six pilot countries: Guatemala, El Salvador, Costa Rica, Ecuador, Venezuela and Brazil. The aim is to link standardised and contextualised procedures to prevent sexual exploitation, abuse and harassment, and to provide safe and confidential interagency community-based complaint and response mechanisms.

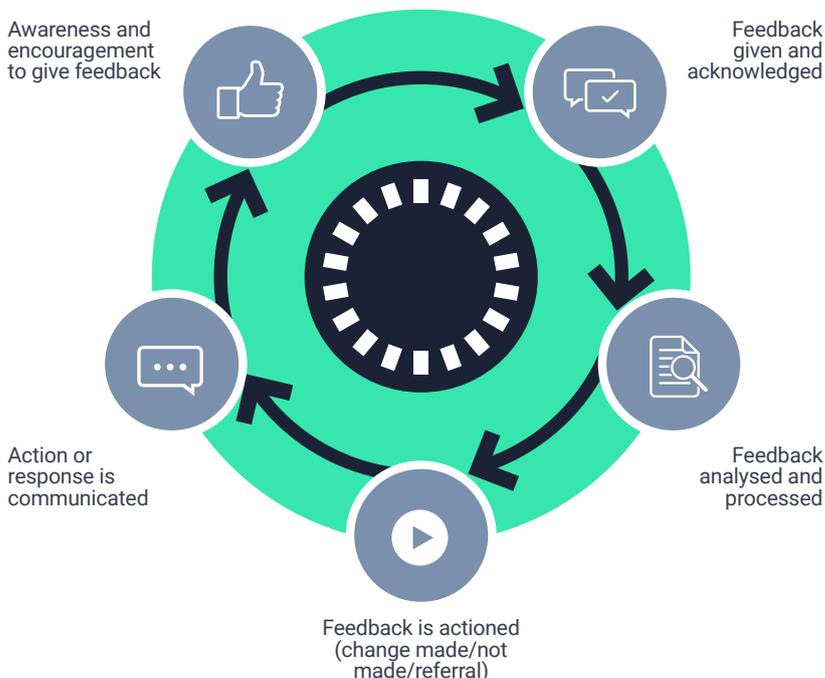
THE FEEDBACK LOOP

Incorporating and managing feedback is a cycle. As illustrated in Figure 2, input is:

- Received from a programme's stakeholders and acknowledged;
- Referred for action and deliberated by the appropriate persons or department;
- Actioned, and action communicated to the stakeholder.

This cycle is standard in humanitarian contexts, but in migration contexts some parts become more challenging. For example, since undocumented migrants may feel unsafe accessing services, this has an impact on how outreach is done, what mechanisms for collecting data are effective and what kind of information may be collected by them. By contrast, the organisational structures that are used for processing feedback and complaints will remain largely similar. These specific issues will be discussed in later chapters.

**FIGURE 2:
THE FEEDBACK LOOP**



LEARNING FROM FEEDBACK

An important part of the feedback cycle is channelling input into changes and innovations that improve the quality, relevance and effectiveness of programmes.

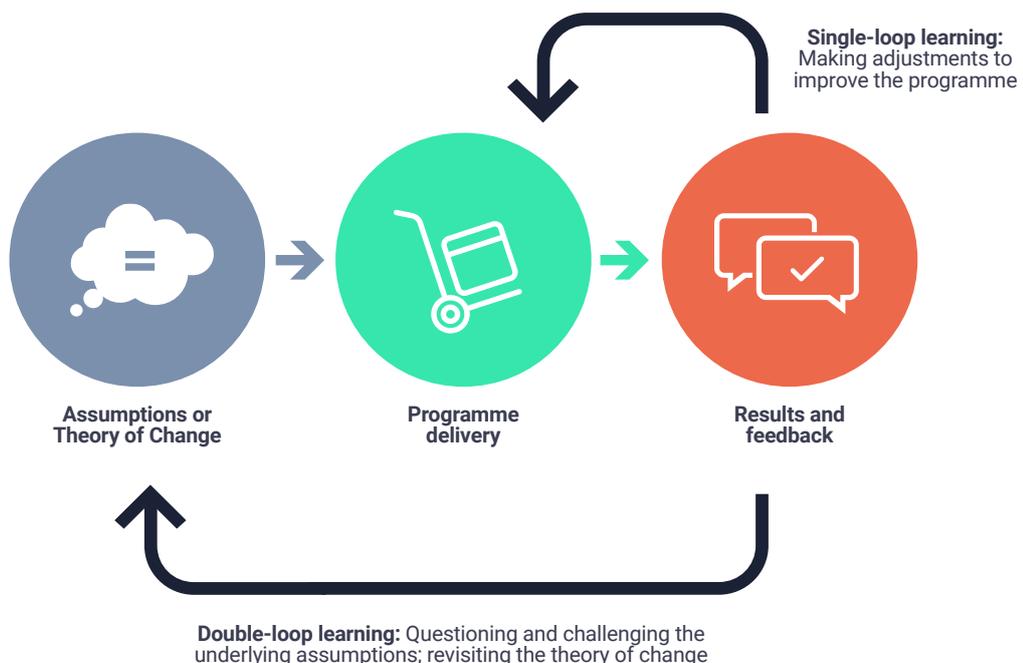
It is important to think about this not just in terms of how it affects current programming, but also how it can orient the overall approach. Humanitarians should be constantly looking for ways to make their interventions more rapid, effective, safe and dignified. Sometimes this is about making changes to programmes, but sometimes it requires a radical re-imagining. This can be described as double-loop learning, as illustrated in Figure 3.

Some recent examples of double-loop thinking at work include things like cash programming, approaches to

urban contexts, or innovations in communication in crises, which will be discussed later. These show how experience in different contexts and situations has been channelled not only into better programme delivery, but into entirely new approaches. Embedding this kind of approach into humanitarian processes can ensure that organisations leave space not only for necessary programmatic 'tweaks', but also for the big innovations that can be transformational.

It is in the spirit of this kind of transformation that this guidance was created, and it is hoped that it will help service providers working with migrants to reimagine their programming.

FIGURE 3:
DOUBLING THE LOOP



III MIGRATION AND MIXED MIGRATION²

A ROUTE-BASED APPROACH TO FEEDBACK AND COMPLAINTS IN MIGRATION

Migrants often travel established routes. These may be defined by geographical or security factors or by smugglers, friends, family or people they meet on the way. Migrants may get information about risks, opportunities and services from people who have already travelled the route.

The mobility of people on these routes poses particular challenges in involving affected people in programme design, and in finding ways to receive feedback and complaints and to follow them up. Organisations have addressed this by working along multiple points in a migration route or by working or communicating with others providing services along the same route. Collaboration can make it possible to get information on one side of a border that can be responded to on the other. Similarly, observational feedback later on the route can help organisations modify their approach: E.g. “They arrived without the sleeping bags you gave them, but everyone was using the hygiene kits.”

Logo recognition is also an advantage of working along the same route, and allows people who have appreciated and benefited from programmes or services to orient themselves toward similar assistance later on. Since migrants tend to have more choice about where and how they seek help than static populations, repeat visits can be taken as, at a minimum, an indication of trust. Simple questions such as, “how did you hear about the services” can help identify these people, and this can also provide an opportunity to ask a few questions about the relevance and quality of the other services they used.

Organisations working in a consortium might consider adopting a route-specific common logo and adopting common standards and consistent services to support such an approach. This was a particularly useful approach for the Signpost programme, which provides information to migrants.

The report from the *Action for Migrants: Routes Based Assistance (AMiRA) programme* in West Africa provides an example of a route-based feedback mechanism, developed by the British Red Cross and Ground Truth Solutions. An example of a route-based interagency complaints mechanism can be found at <https://rssn-america.org/themes/psea-sexual-harassment>.

Mixed migration consists of “complex migratory population movements that include refugees, asylum-seekers, economic migrants and other migrants, as opposed to migratory population movements that consist entirely of one category of migrants.”

IOM Glossary on Migration

Forced displacement has always been a focus for humanitarian agencies, but for much of the past thirty years this has been focused on relatively static situations, such as refugee or IDP camps. It is only relatively recently that the needs of migrants have come more often to the attention of humanitarian actors.

As of early 2020, an estimated 25.9 million people were refugees, with half under the age of 18. Three-and-a-half million people were asylum-seekers and another 3.9 million were stateless people.³ The number of forcibly displaced was dwarfed by the estimated 272 million migrants, two-thirds of them labour migrants.⁴ The motivations for movement continue to evolve, notably including people fleeing the impact of climate change.

The journeys migrants take can be extremely dangerous, with risks of hunger, exposure and exploitation, as well as xenophobic violence, abduction, and lawful or unlawful detention. Migrants may be exposed to risk by smugglers, or fall into the hands of traffickers. Increasingly robust migration management and border protections by governments also drives migrants underground, making it more difficult for them to seek and receive assistance and support, even emergency situations.

The result is an increasing need for humanitarian response in mixed migration contexts. However, this comes with challenges. It can be difficult to locate or identify the target group if they are in hiding or dispersed. People from political, religious or social minorities, notably sexual and gender minorities, in particular may keep themselves apart

² For the purposes of this document, we use the term ‘migration’ for simplicity but acknowledging that the Migration Emergency Response Fund projects focused on mixed migration, which is more complex

³ UNHCR Figures at a Glance, <https://www.unhcr.org/figures-at-a-glance.html>

⁴ International Organization for Migration, World Migration Report 2020, p. 21.

from people from their own country or culture. Migrants are also often important commodities for smugglers and traffickers, creating increased barriers and risks for humanitarian service providers. With migration an increasingly controversial and politicised issue, local communities may be hostile to humanitarians and governments sometimes impose restrictions on the assistance humanitarians can provide.

Humanitarian actors can learn lessons about what works from other similar contexts. For example, ideas about how to engage dispersed communities accessing services at service points spread over a large distance can be drawn from learning from urban environments. Similarly, negotiating access to affected people with smugglers and even traffickers shares some similarities with negotiating access with armed groups, and humanitarians can draw learning about what works in advocating with governments around criminalisation of assistance to migrants from some of the argumentation around counter-terrorism legislation. More information can be found in Figure 5.

In establishing feedback and complaints mechanisms, it is important to recognise that migrants are not a homogenous group. While people with common characteristics – nationality, culture, faith, language or age group – may travel or gather together, humanitarian programmes for migrants should anticipate a multiplicity of countries, cultures and language groups. This brings challenges in understanding and addressing a range of needs and expectations and, importantly, in building trust.

Moreover, a person’s needs and expectations will change, depending on where they are in their journey and what their objectives are. These are not fixed, but fluid. When putting engagement and accountability mechanisms in place, humanitarians should ask about where people are in their journey, how this is affected by changes around them, and how their needs, expectations and objectives are adapting. This can be a particular challenge given migrants are often too busy figuring out their next step to give input and feedback – for people on the move, time is often at a premium.

FIGURE 4:
DIFFERENT STAGES OF THE MIGRANT JOURNEY

CONTEXT	CHARACTERISTICS	EXAMPLE
On the move	People are moving rapidly from one place to another. They are pre-occupied with planning their next step and in a hurry to get there. They may be fearful of apprehension and/or deportation or may be dependent on people smugglers or under the control of human traffickers.	Central American migration route (migrant caravans), migration routes through West Africa or, in 2015/2016 through Europe.
Stable	People are encamped or settled legally, with no concerns about apprehension. They may be easy to identify, depending on whether they are encamped or in an urban area, but generally willing to make themselves visible and available for services. They may expect to remain for some time, may have an interest in investing in engaging to improve services or access to services.	Established camps, refugee reception centres, or settled in host communities
Stalled	Migrants are still eager to continue on the way to their desired destination, but border closures and political barriers have left them stranded	Camps in Greece, Mexico
Settling	Migrants have given up on the hope of moving on to their desired destination and have decided to try to stay where they are.	Migrants in border towns in North Africa (e.g. Morocco), the Balkans.
Returning	Migrants have given up on the hope of moving on to their desired destination and have decided to return home, either assisted or unassisted.	IOM Assisted Voluntary Return and Reintegration programme

CASE STUDY



Los caminantes, or 'the walkers' describes the thousands of Venezuelans who have been leaving the country on foot for more than two years. Without money for accommodation or transportation and often without identity or travel documents, they walk for days seeking better conditions in Colombia, Ecuador or Peru. A survey conducted by the United Nations in 2018 found that many walked up to 16 hours a day and expected to be walking for about 13 days.

Humanitarian organisations provide assistance at borders and along the route, but walkers do not stay for long, pausing only to eat, drink and perhaps rest. Exhausted and entirely absorbed by the journey, they do not have the energy or interest to give input or feedback and are unlikely to complain. There is little time to assess what needs they might have before they have gone.

Organisations have coped by using a variety of strategies:

- Working with people from the same community and with small local organisations that know and are trusted by the group they are targeting (e.g. women's organisations);
- Working along the migration route, identifying two or more locations along the way so they can anticipate the needs and are recognised by the people on the move.

FIGURE 5: HUMAN SMUGGLERS AND TRAFFICKERS

People smugglers work along all of the world's main migration routes, and most migrants who travel some distance will eventually make use of one. For a fee, they serve as guides, provide transportation, and help ease migrants' way through use of bribes and facilitation payments. They make it possible for migrants to find ways across dangerous areas like the Sahara desert or the Mediterranean Sea, and often start out as migrants themselves. However, they are also often exploitative, abusive and/or indifferent to migrants' safety or well-being. One study showed that, "...on all routes, smugglers are responsible for 50 percent of all incidents of sexual violence, physical violence, robbery and kidnapping reported by respondents."

Humanitarian organisations working with migrants sometimes have to negotiate their access to migrants with smugglers, which severely limits their capacity to communicate effectively with them. Since their income relies on providing passage to migrants, smugglers will have little interest in allowing humanitarian organisations to provide independent information about risks and barriers they might face. They may control the spaces that migrants inhabit and act as gatekeepers to humanitarians in discussing needs or experience of services provided.

There is often confusion – sometimes deliberately created – between smugglers and Human traffickers. While smugglers facilitate the journey, typically their involvement ends there. Traffickers, by contrast, use coercion or deception to exploit people and entrap them into forced labour, sexual exploitation or prostitution, slavery or even organ harvesting. There can be a thin line between trafficking and smuggling, and often victims may not even be aware they are being trafficked.

This is relevant to the issue of feedback and complaints because efforts to engage migrants are likely to bring humanitarians into contact with smugglers. Navigating this and negotiating access to migrants can incur risks, both for humanitarian organisations and for the people they aim to help. The following are some experiences and tips from humanitarian organisations working with migrants:

- **ASSESS RISK.** Do a good risk assessment in advance, identifying possible risks and mitigation measures with local staff, partners and members of the community.
- **BE TRANSPARENT.** Explain clearly who you are and why you are there. Be honest about your principles and how you engage with authorities and law enforcement.
- **DO NO HARM.** Be aware of and alert to indicators that your presence or engagement might be putting migrants more at risk, and identify any possible avenues that can be used to increase their safety.
- **DON'T OVERREACH.** Engage in anti-trafficking activities only if you have the skills and capacity. Provide training to field workers on possible avenues to help people, but also limitations, and ensure these are respected for the safety of all staff and volunteers.

While there is no specific guidance on negotiating access with humanitarians smugglers, many of the principles that apply to working in areas controlled by non-state armed actors apply similarly in these circumstances. This includes developing relationships, understanding motivations and adhering to humanitarian principles. Resources on humanitarian negotiations can be found at <http://www.humanitariannegotiations.org/resource-database/>

THE CHALLENGE OF A CHANGING CONTEXT

TOP TIPS

- Ensure you are systematically collecting and analysing disaggregating data so you can spot changes in the target population earlier and adapt programmes faster. Think about gender and gender identity, age, and disability, as well as language and culture.
- Invest in information management tools and share information with partners working locally and those farther along the migration route.
- Anticipate changes that might be needed if there are demographic changes and be prepared. Can women and children's clothing and menstrual hygiene products be readily procured? What special training and/or security checks might staff and volunteers need if they are working with children?
- Track emerging rumours and have a transparent process ready to investigate or otherwise follow up reports of exploitation, abuse or breaches of confidentiality among your staff or those of referral partners.

Contexts change as migration progresses, sometimes fundamentally. These changes can be caused by socio-political, economic or other factors, as the coronavirus pandemic has highlighted. Some of these changes are unexpected, but there are also often patterns that may be anticipated and planned for.

For example, at the beginning of large-scale movement of migrants into Europe, the Americas and West Africa, countries in all of these regions were initially welcoming and relatively permissive environments for groups of migrants largely in transit. In each region, however, attitudes started to harden as borders farther down the migration route closed and local people – often suffering from poverty and other difficulties themselves – became frustrated. Governments strengthened border controls, cracking down on undocumented migrants and sometimes also on people assisting them. This makes it difficult to identify needs and provide assistance, let alone encourage participation, or respond to feedback and complaints.

Another pattern seems to be an initial arrival of mostly young male migrants, followed by women, children, and sometimes older people. For example, in June 2015 men made up 75% of arrivals from Turkey, but by January 2016, accounted for only 45%, with women and children making up the balance. This was attributed to men travelling first to assess the route, and families following behind.⁵

A similar dynamic was noted on the route from the Northern Triangle, though in that case the demographic shift was attributed to the causes of movement. Previously migrants were mainly young men seeking opportunity, but increasing numbers of young women were on the move, with numbers nearly doubling from 2012 to 2017 as women and girls fled widespread gender-based violence.⁶

“The context completely changed with the law. Before, Agadez was a big transit area. Migrants lived in a relatively organised way, with decent lodging and so forth. Now it is more clandestine, in the periphery of the city with little security. They hide and are reticent about coming out, even for mobile clinics or to collect water. They are very wary now. The result has been a deterioration of their condition.

Alternative migration routes are now being taken by migrants, and as a result there are more deaths and people lost in the desert. The smugglers have also become more expensive. So [our services] are not their first priority.”

⁵ Duncan Robinson, Women and children refugee numbers crossing into Europe surge, Financial Times, 20 January 2016. <https://www.ft.com/content/dff3b5ea-bf99-11e5-9fdb-87b8d15baec2>
⁶ Teresa Welsh, NGOs grapple with shifting demographics of Central America's migrants and refugees, Devex, 16 August 2018. [devex.com/news/ngos-grapple-with-shifting-demographics-of-central-america-s-migrants-and-refugees-93291](https://www.devex.com/news/ngos-grapple-with-shifting-demographics-of-central-america-s-migrants-and-refugees-93291) Jeffrey Hallock, Ariel G. Ruiz Soto, Michael Fix: In Search of Safety, Growing Numbers of Women Flee Central America, Migration Policy Institute, 30 May 2018. [migrationpolicy.org/article/search-safety-growing-numbers-women-flee-central-america](https://www.migrationpolicy.org/article/search-safety-growing-numbers-women-flee-central-america).

This kind of radical shift in the identity of the target population makes a profound difference in the kind of assistance needed and how it should be provided, including who should provide it. In addition, special protections and spaces are needed for unaccompanied minors, women and families, as well as other vulnerable groups. NGOs need to be prepared to respond to the needs of survivors of gender-based violence (GBV) perpetrated both at home and along the route, including reliable referral pathways with trusted partners. Figure 6 suggests a few things to think about.

In thinking about how to engage with challenge and change in migration contexts, it is worth referring to learning from urban environments. Indeed, migrants often find themselves in urban environments, looking for accommodation, opportunity and transportation. And many of the challenges of working with resident or displaced populations in urban communities hold true for migrants as well: they are often impoverished and have limited access to safe accommodation, food or goods; and they are often dispersed area and therefore require more sophisticated communication means. Often, service providers maintain versatility by working in partnership with local actors supporting the urban poor and by facilitating access to existing services rather than establish services of their own.

FIGURE 6: ADAPTING TO CHANGES IN THE TARGET POPULATION

Feedback and complaints mechanisms must adapt and adjust in a variety of ways when there is a substantial demographic shift in a migration flow:

- Adjust the staffing model, as women may be less likely to give feedback or complain compared to men, particularly if the subject is sensitive.
- Increase capacity for observational feedback, so that adaptations can be rapidly made. For example, as the number of women increases, physical changes may be needed to on-site facilities (e.g. separate, safe toilets and bathing areas) and to services, including more female first aid and medical staff, women and children's clothing, and menstrual supplies.
- Reassess how people want to communicate and what their information needs are.
- Be aware of rumours and gossip, particularly when they concern emerging risks or misconduct of humanitarian or other service providers. Pay particular attention to those involving partners, especially those in your referral pathways.

MIGRATION POLITICS AND HUMANITARIAN PRINCIPLES

TOP TIPS

- Consider conducting a perception survey to determine how you your activities are viewed by migrants. Do they consider you neutral, impartial and independent? Does this affect uptake of services and willingness of to engage?
- Think about all of the possible stakeholders, and not just the ones directly receiving assistance. How can you get feedback from the wider community about how they feel about what, where and how you are providing assistance to migrants?
- Review mechanisms to ensure that they allow migrants to share information or make complaints without putting themselves at risk of detection or retribution from authorities or other people who hold power over them, e.g. armed groups or smugglers/traffickers).
- Conduct a risk assessment of whether data collected by feedback and complaints mechanisms can be used for political purposes, including against the best interests or wishes of affected people, and identify mitigating actions.
- If working with migrants who are living with restrictions of their freedom – in detention or under the control of smugglers/traffickers, for example, try to find ways to frame questions that capture concerns about other subjects than just immediate services.

“There are many programmes funded to discourage migration - we don't do that. That helps to create a stronger sense of confidence. For example we had someone who needed help but had trouble getting it because of legal status, but we don't care about legal status, and everyone knows that, so they came to us and we were able to help.”

Migration is a deeply political issue, creating rifts and divides in society, which are often manipulated by political parties and organisations. Governments can make it difficult for humanitarians to provide assistance to migrants by manipulating the physical and legal space. As always, humanitarian principles are a critical tool for gaining and maintaining access.

NEUTRALITY AND INDEPENDENCE – As noted above, when large arrivals of migration take place, governments often seek to slow or stop cross-border movement. Reducing negative factors that force people to migrate, such as poverty and lack of opportunity, can have a positive impact on people's lives, but motivation matters. Migrants will not trust organisations if they perceive they

In the UK, a civil society organisation has taken legal action to challenge charging for access to maternity care. Their research, they said, showed women are “commencing care late, skipping appointments and in some cases giving birth at home unattended”, adding there is a “real fear of having the [government] informed of their insecure immigration status if they do seek care.”⁷

are seeking to promote or discourage their movement, rather than being motivated by a desire to promote migrants' wellbeing. Organisations should take measures to avoid the perception that their work is politically influenced or directed.

IMPARTIALITY – To ensure humanitarians are reaching those most in need, they need access to the population. If people are in hiding because they fear detection and possible detention or deportation by government actors, this becomes impossible. Humanitarians should advocate for migrants – including undocumented migrants – to have unconditional access to life-saving assistance. Fees and ID checks should be waived to ensure the most vulnerable are able to safely access assistance.

A humanitarian organisation working in a government-run reception centre in Europe was not permitted to speak to the residents about anything other than the service they were providing. They were allowed to hold focus groups about beneficiary satisfaction, but these were attended and monitored by government representatives, and any issue that came up that did not concern the services was immediately shut down. It was impossible to speak openly with migrants about their concerns, or even to ask open-ended questions. For the organisation, this raised serious questions about the humanitarian nature of their response.

SOME RESOURCES FOR REFLECTION:

[*UNHCR says won't work in Greek 'detention centers' in swipe at EU-Turkey deal, Reuters, March 2016.*](#)

[*Press Release: Don't build new detention centers for asylum seekers in Europe, Oxfam says, September 2018*](#)

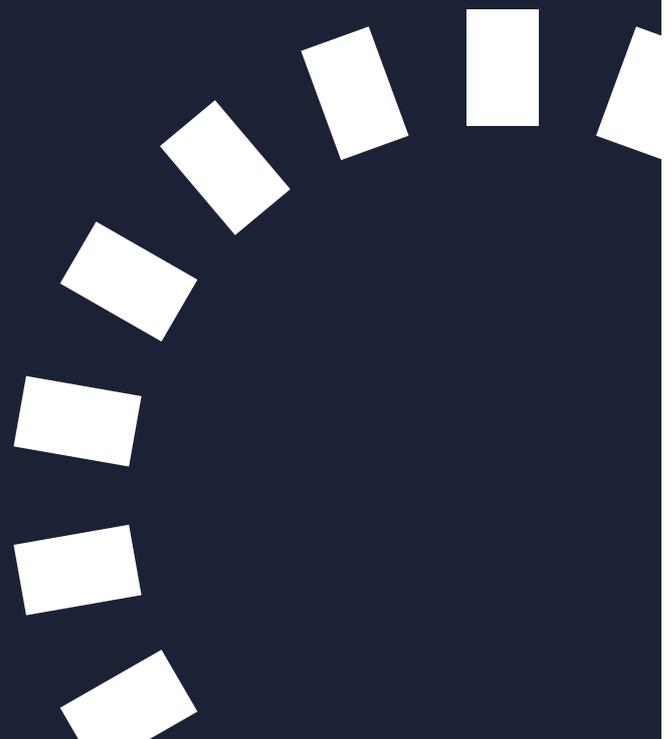
[*IFRC: New Walled Order: How barriers to basic services turn migration into a humanitarian crisis, July 2018.*](#)

[*ICRC Policy Paper on Immigration Detention, April 2018*](#)

7 Aamna Modin, *Charity launches legal action against NHS fees for pregnant migrants, The Guardian, 16 October 2019*

SECTION 2

IMPLEMENTATION



V PLANNING

TOP TIPS

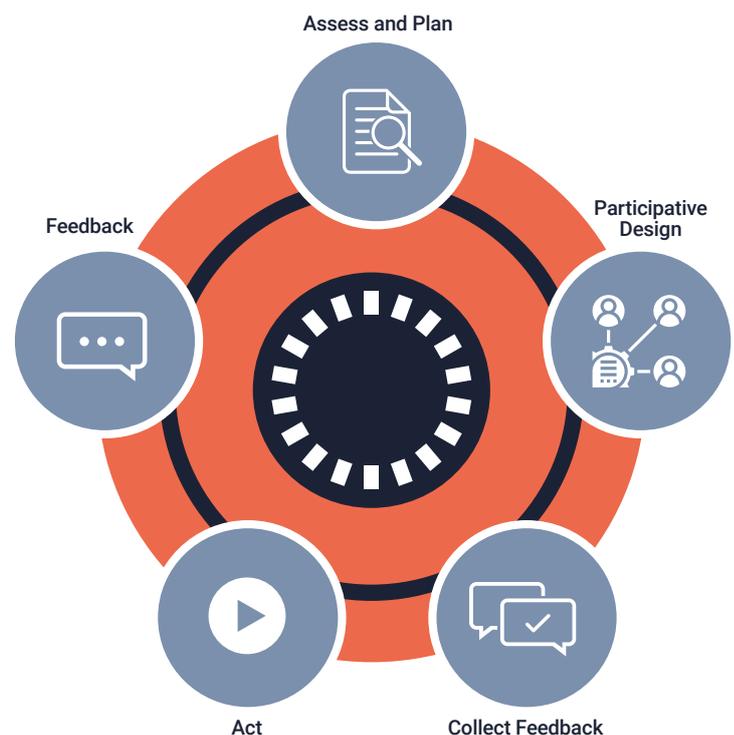
- Accountability isn't an activity, it is a culture. Make sure its importance is reinforced by leadership at all levels, and that it informs everything you do.
- Take the time you need to recruit and train staff, including interpreters. Don't forget to support and protect staff – the more they are trusted by migrants, the more distressing tales they may be exposed to.
- Building trust takes time. If you can't stay present in the long-term, can you partner with someone who will?
- Build feedback and complaints mechanisms into your design, right from the start. If mechanisms are not implemented immediately, plan for ways of capturing and responding to feedback and complaints conveyed informally.
- Budget for all the resources you need, including technical and physical resources, but also people's time, training and support. Don't assume it can be covered by existing resources.
- Anticipate you may receive complaints, including sensitive complaints, through any channel, about anybody. Be prepared to manage these sensitively and confidentially, but also transparently.

BUILDING AN ACCOUNTABLE ORGANISATIONAL

CULTURE: In any emergency, effective planning and preparedness is the key to delivering well, and migration is no different. The bedrock of effective feedback and complaints systems is a strong organisational culture of accountability to affected people, committed leadership and established systems to draw on. When these are in place, collecting and responding to feedback becomes a reflex, even when programmes start at short notice and formal mechanisms were not established.

HUMAN RESOURCES: Reinforcing the culture of accountability is therefore a core part of the planning process. This means having policies in place, and providing training, guidance and support. Most organisations working on migration routes say that the key to building trust is having the right people in place. It is worth taking the time to prepare and support them.

This includes people recruited from the migrant community. Often these people are recruited because they bring knowledge and understanding of the affected people and are trusted by them. You are borrowing their good name, and they are borrowing yours. Make sure they understand what you stand for and how you work.



MAXIMISING COORDINATION AND REDUCING DUPLICATION



Migration responses are often established in countries or regions where humanitarian responses are already in progress. There may be a temptation to remain siloed when the target populations are different, but it may be useful and appropriate to join coordination and interagency complaints mechanisms, where they exist. This can reduce confusion for service-users about who to call if they have questions or concerns and can ensure that complaints disappear in a gap between systems.

It is important to consider, when connecting with government-run hotlines or complaints mechanisms, that these may be problematic for undocumented migrants to access, particularly if they are concerned about detection. Being perceived as connected with government systems may also affect the perception of your neutrality.

It may also be worth considering whether third-party or independent collection of feedback can be conducted by external actors: peer organisations or private sector. If this service is visibly independent, it can help avoid 'courtesy bias, which occurs when users feel obliged to be positive about services in the face of those that provided them.

Since undocumented migrants may be vulnerable to arrest and/or deportation, it is important to agree with any third party on what information can and cannot be shared, and how data is managed.

Plan resources for processing feedback and information management: It is not enough to collect data if you don't use it effectively. This requires both technical and human resources, and these should be planned and budgeted from the start. Do not forget that these are ongoing costs as, too, are those related to translation and interpretation

CONTEXT AND STAKEHOLDER ANALYSIS: Good planning also means having a good context and stakeholder analysis. What are the migration trends? If there is a crisis today, is it likely to go away quickly or to continue in the longer term? Word-of-mouth and long-term reputation is critical when trust is at a premium, even in highly mobile and transient environments. If you are not going to stay, are you better off to work in partnership?

RISK ASSESSMENT AND PREPAREDNESS: Are you anticipating patterns and preparing for changes in demographics? How might the next 'arrival' of migrants' communication needs be different from the ones you are dealing with today? Are you anticipating risks in the legal and political environment and how you and partners can maintain engagement with migrants in a more constrained scenario? Think not just about the context overall, but also how each feedback or complaints mechanism or tool could potentially expose migrants to risk, particularly if they are raising sensitive issues.

PLANNING FOR PARTNERSHIP: Partnerships with local organisations and, often, government organisations can be crucial in migration contexts, where service provision is often as much about facilitating access to existing services as it is about putting new ones in place. How will you assess the accountability frameworks partners have in place and ensure they collect and monitor feedback and complaints in a way that is compatible with your values and requirements?

PUT MECHANISMS IN PLACE FROM THE START: Feedback and complaints mechanisms are often not designed early enough to embed them in the programme. This should be avoided wherever possible, as it takes more work to put them in later, and often far more time. Questions about how people want to receive information and give you feedback should be part of the initial assessment.

PLAN FOR HOW YOU WILL COLLECT AND MANAGE INFORMAL FEEDBACK: The majority of information and feedback comes from informal exchanges or observations at the point of service delivery. Too often this is not captured and only acted on in an ad hoc manner. Design simple tools for tracking informal input and your responses to it.

"Typically what happens is that the activities come first and then we patch the MEAL systems in later because the donors want it. We need to be more proactive and put it in place right in the design phase, recruit the right people, and allocate the right amount of money to personnel, training, and systems."

VI DESIGN

TOP TIPS

- Consult with migrants and other stakeholders to identify how they want to communicate with you. Don't forget to consult with a variety of people, including men, women, younger and older people, people with disabilities, and people from groups that are often discriminated against, such as sexual and gender minorities.
- Have more than one mechanism for receiving feedback and complaints. Each of them should be tailored to the needs, and capacities of the target groups.
- Ensure you have both active and reactive mechanisms in place, and that at least some mechanisms provide the space for people to raise issues you may not have thought of.
- Meet people where they are – use systems with which service-users are familiar and comfortable.
- Don't overstretch – Don't design a system you can't maintain or keep up-to-date.
- Be aware of the importance of both informal and mobile feedback in migration settings

POINT 1: THINK ABOUT WHAT YOU ARE TRYING TO ACHIEVE

When you proactively engage migrants, what do you want to know about your programme and its stakeholders? Who should you ask? Do you have specific questions about how a service was experienced, or are you trying to understand more broadly what people need? Be as precise as possible, and bear in mind that in fast-moving migration contexts, when trust is low and people have a lot of decisions to make, you may have few opportunities to ask questions or to follow up.

Seek out information actively, but also provide opportunities for people to find you. This may yield more and broader information and concerns, including about issues you may not have thought of. Migration contexts are fast-moving, often changing in ways that you are unable to predict.

Consider also how to receive feedback and complaints from other stakeholders. Members of the host population are particularly important in migration contexts. People living close to where you are providing services may be frustrated when unwanted food or non-food items are thrown in their gardens or streets, for example. Or you may be inadvertently creating protection risks by providing vocational skills classes for young men around the same time young girls are going to and from school.

POINT 2: IDENTIFY THE RIGHT TOOLS

Numerous mechanisms can be used to collect feedback and complaints. Each has its strengths and weaknesses, and only consultation with affected people will determine what will be most effective in your context. Consult with a variety of people, including men, women, younger and older people, people with disabilities, and people from marginalised groups such as sexual and gender minorities.

Use several different ways to collect information. Not only do people have different ways of communicating, they also use different tools for different purposes. For example, they may prefer to give programmatic feedback face-to-face or informally, but make a complaint more formally or anonymously. In addition, people's perception of services will evolve with time, so it is useful to get their views not just at the moment they are receiving assistance, but also later on.

Think about how and how much you use technology. Technology can be an extraordinarily valuable tool in migration contexts, allowing feedback to be collected even after people have moved on, but it can also be alienating. Experience shows people prefer face-to-face, two-way communication, and are more likely to give feedback that way. People on the move use mobile technologies

largely for peer-to-peer exchange of information and to keep in touch with family and friends,⁸ so it is important to capitalise on familiarity with different tools, but not to make assumptions about how they want to communicate with service-providers.

Don't forget to keep on top of changes in context and the demographics of the people you are working with. Consult with people regularly to ensure your mix of tools and mechanisms is still right.

POINT 3: INTRODUCE YOURSELF

Don't forget that engagement is a two-way process. In line with Core Humanitarian Standard 4, organisations should, "Provide information to communities and people affected by crisis about the organisation, the principles it adheres to, how it expects its staff to behave, the programmes it is implementing and what they intend to deliver." This should include information about the organisation's commitment to accountability and what that means in practice. It should emphasise why their feedback is valued, how it is used, and what you can and cannot promise in terms anonymity, confidentiality and follow up.

POINT 4: DON'T NEGLECT INFORMAL FEEDBACK

"It is difficult to break the barrier, to gain confidence of migrants. We have information informally, but migrants avoid formal systems. So it is important to ensure that it is separate from bureaucratic or authority systems. It's a marathon, not a sprint."

Informal feedback is a vital part of any humanitarian response, but may be particularly key in migration contexts, where it can be more difficult to follow up with service users or have them give more formal feedback or complaints. Humanitarian agencies working on routes where migrants are moving rapidly make constant adjustments to programmes based on comments overheard or made directly to staff or observations on the job.

THINKING ABOUT MOBILE TECHNOLOGIES

The mass movement of migrants and refugees into and across Europe in 2015 made it clear "that refugees regard connectivity as a basic necessity".^a While the importance of smartphones and mobile technologies and the way they are used will vary from one place to another, charging stations and Wifi access are now as fundamental a part of a migration response as food, shelter or clothing.

Humanitarians have embraced mobile technologies as a tool for communicating to and with migrants, and for good reason: they are widely accessible, travel with the user, and are available whenever people need them. But mobile technologies don't

meet every need. They require compatible technology and access to the internet, literacy, and language skills. Also, although smartphones seem ubiquitous, it is important to remember that not everyone has one. A survey of refugees and migrants from Venezuela conducted in 2020 found 30% of respondents did not have access to a mobile phone.^b

Every tool is different, and people respond and behave differently when using them. They must be individually assessed to identify the best fit for the organisation and the needs of the programme in terms of resource intensiveness and data protection, among other considerations.

It is important to be organised before going live. Consider:

- *What is the volume of response you might receive?*
- *Do you have enough staff?*
- *Are staff prepared with answers to the most likely questions?*
- *Have you tested scripts and trained staff on language and terminology use?*
- *How can you facilitate access? Assess barriers to people using mobile technologies to reach you and other humanitarian organisations and think about how you can remove them.*

^a GSMA, The Importance of Mobile for Refugees: A Landscape of New Services and Approaches

^b IFRC, Only half of refugees and migrants from Venezuela feel informed, survey finds, 30 January 2020. media.ifrc.org/ifrc/2020/01/30/half-refugees-migrants-venezuela-feel-informed-survey-finds/



CASE STUDY

MIGRANT INFORMATION WEBSITES



A number of organisations have established information websites for migrants. Typically these tools provide guidance about access to state services, assistance provided by civil society organisations, and basic information about legal rights and requirements.

One example is Refugee.info, established by the International Rescue Committee (IRC) and Mercy Corps along the Mediterranean migration route in 2015. While pages covering the Balkans were handed over to local partners, Refugee.info still provides information for migrants in Greece and Italy as part of the broader Signpost programme, which also encompasses khabrona.info for Syrian refugees in Jordan, and cuéntanos.org, providing information about services in El Salvador, Honduras and soon Guatemala.

The Red Cross and Red Crescent Movement developed a similar tool, the Virtual Volunteer (<https://virtualvolunteer.org/>), which provides information for migrants and refugees in four countries, as well as to Filipino nationals.

Another interesting tool, no longer active, was News That Moves – Mediterranean Rumour Tracker, established by Internews with support from Translators Without Borders, and which debunked misinformation and hearsay.

These tools provide an interesting illustration of how technology can be used to engage migrants over the course of their journeys. Never intended to receive and respond to feedback and complaints, they are nonetheless responsive, constantly adapting to changes in context and information needs. They can create useful dialogue between an organisation and the people it is seeking to help.

However, the organisations that have established them caution that it is extremely resource intensive to collect, collate and fact-check information and turn it into usable content in a timely way, in a number of languages. To respond to requests and concerns is still more labour-intensive, and all of this work requires specific skills. Moreover, it is important to manage people's expectations of the sites, as they will never be able to meet every information need.

It is important to remember that "social media is the most used channel, but not the most trusted channel." People are increasingly alert to 'fake news' and aware of the internet as a possible place of risk. It can be difficult for them to differentiate between humanitarians' 'good' information and all the other information out there.

One way that some humanitarian organisations have found to bridge this trust gap is to work through social media influencers. Collaborations of these kind can allow organisations to take advantage of the trust that influential people have already established with a large group of followers on platforms like Instagram, for example. In order for this to work, however, organisations must be sure they are reaching the right group of people, and be careful not to partner inappropriately, potentially putting the reputation of the organisation at risk.

"There is a lot of information on social media but it is incorrect or inaccurate. We would like to receive information through social networks but from trusted sources; true and accurate information." *

* IFRC, Only half of refugees and migrants from Venezuela feel informed, survey finds, 30 January 2020. media.ifrc.org/ifrc/2020/01/30/half-refugees-migrants-venezuela-feel-informed-survey-finds/



“Feedback that allows us to modify our programme comes largely from the response itself. We see that people turn things down or don’t take things, or take more of something else or ask for things we are not giving them. Or we notice that the children need more care or attention, so we provide childcare.”

“We have made changes based on feedback, so for example, we noticed in giving prescriptions that people were not taking the medications properly because they were not eating properly, so we brought in supplemental food.”

Ironically, considering migrants themselves are so transient, research for this guidance note indicated that longevity is important in providing support to migrants. While individuals may not stay and become frequent or recurrent users of programmes, they may pass information through word of mouth, often to the people that follow them. Interviews and studies show that information from trusted friends and acquaintances is among the most important.⁹ Migrants will pass information between them as they travel, and will also convey information to friends at home, preparing to make the same journey. This critical word of mouth relies on consistency and continuity, adherence to principles, and respect for migrants and their rights. Importantly, this kind of trust and word of mouth is itself a form of feedback about the quality of the services and how they are appreciated – or not – by migrants.

Unfortunately, informal feedback is often not – or not consistently – collected, analysed or acted on. The first step is to make sure that there is a time and space for capturing informal feedback. Some organisations use tools like a shared spreadsheet or log. These may be hard or soft copy, local or online, so long as the whole team can access it. Data collection tools such as ODK or Kobo

that are used by field workers for other work can be used to collect informal feedback as well. Another method used by some organisations is to hold a meeting at the end of every shift or workday to exchange information or feedback that staff and volunteers have received, and brainstorm about how to incorporate it. The important thing is to use something light touch, with which the team is comfortable and familiar, or it will not be maintained.

Having captured informal feedback, it is also important to track how it has been actioned and report this back to service-users. This is worth doing even if the person that shared their concerns has moved on, as will be discussed in section VIII. Information about how humanitarian organisations have taken action on the basis of this kind of feedback is also useful for internal monitoring and evaluation purposes, and to illustrate to donors and other partners how beneficiary input is taken on board.

RUMOURS AS INFORMAL FEEDBACK

Rumours provide important and valuable insight into what the community thinks of the humanitarian response, what they do not understand, and what information gaps exist.¹⁰

People on the move have extremely high information needs about everything from where to get assistance to how to get a visa. Because people’s information needs are

“We don’t really do surveys face-to-face, because we don’t want them to be made uncomfortable or feel like they are being examined. We are trying to be human and have a friendly conversation with dignity – not turning them into a subject, but relating to them as people. We do some one-to-one interviews and slip in some questions about whether they think what they are getting is helping. We have an internal document we put the feedback in.”

⁹ Interviews with humanitarian organisations in Niger, Europe. Also see MMC West Africa 4Mi Snapshot March 2019, http://www.mixedmigration.org/wp-content/uploads/2019/06/062_snapshot_wa_en.pdf.
¹⁰ *Managing Misinformation In A Humanitarian Context* ☒ *Internews Rumour Tracking Methodology*, p. 10 <https://internews.org/resource/managing-misinformation-humanitarian-context>

TOP TIPS FOR COLLECTING AND USING INFORMAL FEEDBACK

- Train and support staff in collecting informal feedback. Ensure there is extra capacity to be available to migrants and hear what they have to say.
- Create a space for sharing and recording informal feedback, and routinely review and action it.
Ensure action taken in reaction to informal feedback is reported alongside responses to formal feedback.
- Track rumours about context and maintain channels to address information gaps and dispel risky or dangerous misinformation.
- Track rumours about fraud, corruption, exploitation and harassment, including sexual misconduct, and investigate.

to make rapid choices and act on misinformation.

The CDAC publication, *Rumour Has It* distinguishes between wish rumours rooted in people's hopes, fear rumours, rooted in anxieties, and hostility rumours, rooted in threats or prejudices.¹¹ While fear rumours are said to be the most prevalent in general, those working in migration contexts should be alert to wish rumours and their potential risks. In the migration crisis in Greece in 2015 and 2016, for example, rumours included "After having an appointment, you have the right to demand an apartment" and "When you register via Skype, you immediately get housing and money card".¹² Rumours about borders opening have resulted in armed clashes between border guards and migrants.

Not tracking and responding to rumours can also lead people to assume that humanitarian organisations don't have the most current information and, as a result, increasingly rely on information that may be false or biased, coming from sources with their own interests, like smugglers.

Rumours may also be the main or only source of information about problems in behaviour of staff, volunteers or authorities. People may hesitate to make formal complaints if they feel they have been treated incorrectly or have become aware of fraud, corruption or (sexual) exploitation, but often this will surface in the form

"The majority of respondents depended on their social network for information. Almost every respondent described having at least one friend or family member in another country."

However sometimes such information was not reliable:

"Our respondents asked friends and family members prior to their journey about the best ways to travel, including which trochas* were safer, what they needed to bring, and how much the journey would cost... Respondents were, overall, primarily unhappy about most of the information they received from friends and family, reporting that it was often unreliable."

of rumours. Organisations should be aware of rumours like these and ensure that they are investigated. This must be carefully managed to avoid fostering a culture of gossip, but it is important to remember that allowing rumours to circulate will do more damage to the reputation of staff and/or the organisation as addressing them openly and transparently.

¹¹ John Bugge, *Rumour Has It: A Practice Guide to Working with Rumours*, CDAC Network, 2017, p.

¹² Carlson, M, Jakli, L, and Linos, K, *Rumors and Refugees: How Government-Created Information Vacuums Undermine Effective Crisis Management*, *International Studies Quarterly*, Volume 62, Issue 3, September 2018, Pages 671–685, <https://doi.org/10.1093/isq/sqy018>

POINT 5: THINK ABOUT LANGUAGE AND COMMUNICATION

Mechanisms in any humanitarian setting will need to be adapted to cope with a range of levels of literacy and technical literacy. This complexity can be amplified in contexts of migration in which people may be travelling from multiple countries and speak different languages. An initiative in the UK to translate government guidance on COVID-19 for migrants started small and expanded to 60 languages. Some of these were quite limited dialects, but were added in reaction to feedback that there was a particular need.

It is also important to test communications and ensure that language is being used appropriately. Humanitarian agencies in virtually every region found that migrants were uncomfortable with the word 'complaint' and that it took considerable effort to encourage them even to be a critical friend. Organisations tend to use words like 'feedback' or 'input', but emphasise that this is highly contextual, and that the right terms need to be identified in consultation with people themselves.

POINT 6: BE REALISTIC IN YOUR EXPECTATIONS

Accept that the systems will not be perfect. For example, in static contexts a variety of sampling techniques are used to ensure that surveys and similar beneficiary feedback tools reach a sufficient number and diversity of people to be representative and reliable. In contexts where people are on the move, sampling simply cannot be as robust. Follow up will also be more difficult given the importance of anonymity to people who may not want to be detected. Accept that there will be an impact on the efficacy of feedback and complaint mechanisms, but also that this does not cancel out the benefit.

It may not always be possible to engage people directly. Often time is short and people have other priorities. Sometimes migrants are only accessible through intermediaries such as smugglers. In these cases partners or trusted members of your network may be able to fill a feedback gap.

POINT 7: DON'T LOSE SIGHT OF THE INVISIBLE

In camps or other static situations, vulnerable people may be initially overlooked but, once identified, can be supported. In contexts of migration, they may be even more difficult to detect. They may also feel threatened by an environment often dominated by young men, and make themselves even more invisible. Women, young people, older people, and people from sexual and gender minorities feel intimidated to participate in focus groups or interviews, making it difficult for them to input into programme design, give feedback, or make a complaint.

Moreover, since the first arrival of migrants is often made up largely of men, humanitarian organisations will not capture these voices if they neglect to reassess communication needs and adapt programmes to changing demographics. Constant analysis is required to ensure mechanisms and tools are still fit for purpose.

POINT 8: MAKE YOUR FEEDBACK LOOP AS SHORT AS POSSIBLE

Migration contexts change with great rapidity, so it is vital to be constantly collecting and processing data, and to keep the time between receiving feedback and adapting programmes as short as possible. There are numerous ways to do this. For example:

- *Monitor and react continuously to information as it arrives. This can be supported by good information management, as discussed in the next chapter.*
- *Empower staff and volunteers to make simple changes without extensive consultations*
- *Provide field staff with the necessary tools (e.g. smartphones or tablets with Kobo or ODK technology) to digitise feedback immediately so that it can be referred and followed up*
- *Ensure that each stage in the feedback cycle has a maximum time limit*

“We had made toilets for women and men, but after a few days we noticed that men had moved into the women’s and were even sleeping there. Women were having difficulty getting in. We set up separate toilets for women and controlled access to keep them clean and safe. That’s when LGBT and especially transsexual people came. They were afraid to go to the men’s because they were being harassed, but were being rejected in the women’s. Discussions made it clear that we were not addressing the needs of this particular community.”

VII DATA COLLECTION AND PROCESSING

BUILDING CONFIDENCE AND INSPIRING TRUST

“The [informal] migrant camps in Morocco, both rural and urban, have an internal organisation system where several communities cohabit in the same space but in separate zones and a board of community leaders speak on behalf of and represent their entire community. The project involved community leaders from the beginning so that they could give voice to the population’s needs...their involvement played a key role in promoting acceptance of [our] work.”

It is often said that trust is a form of currency, and this is particularly true in migration contexts, where people routinely put their lives at risk, and in someone else’s hands. A variety of factors affect how willing migrants are to trust humanitarian actors, including some issues that have been discussed in the sections above. Examples include whether or not someone has a legal right to be on the territory, how rigid the government of the country is, and how accepting the local population is.

Trust takes time to build, and although this is feasible in static or stalled situations, it is harder in situations in which people are on the move. The following are a few tips offered by organisations working in migration contexts.

WORK WITH AND THROUGH MEMBERS OF MIGRANT GROUPS. Humanitarian organisations say bringing representatives of migrant groups into the response as staff, volunteers, or as trusted interlocutors is the most important factor in developing trust, though it can be challenging to locate and retain the right people, especially if they are on the move themselves. In recruitment, it is important to consider national, cultural, linguistic and religious background, but also lived experience of migration.

HAVE SOMETHING TO OFFER. The best way to engage people in dialogue is to show you care about what they need. Quality service provision can be the most effective

way of building trust. This can backfire, however, if what you offer is not perceived to have value, or if you are not clear from the outset about any limits of your support. Information – a valuable and valued commodity in itself – is often an excellent way to establish a rapport, but it must be relevant, up-to-date and, above all, must not increase risk.

BUILD TRUST WITH ALL STAKEHOLDERS. In some countries or regions migrants may only be accessible through smugglers or other intermediaries. In these cases it is necessary to develop a trust relationship not only with the migrant but also with the gatekeeper. Trust is also a key component of relationships with local communities.

DON’T COLLECT DATA YOU DON’T NEED. Allow people to remain anonymous if they wish. Data that is collected should be responsibly managed, according to both law (e.g. GDPR regulations) and the do no harm principle.

“PROVIDE INFORMATION TO COMMUNITIES AND PEOPLE AFFECTED BY CRISIS ABOUT THE ORGANISATION, THE PRINCIPLES IT ADHERES TO, HOW IT EXPECTS ITS STAFF TO BEHAVE, THE PROGRAMMES IT IS IMPLEMENTING AND WHAT THEY INTEND TO DELIVER.”¹³ In migration contexts, fear of detection can be profound. Migrants fear being returned home or charged with a crime, such as human smuggling. They may be sceptical of organisations’ independence of government, especially if they seem to be encouraging them to go home.

“These systems are about trust, so there has to be continuity. They come with a first test, and then decide if they will come back. If you fail, people won’t come back with more feedback, and that will also carry on through word of mouth. And that again rebounds on the programme. If they are treated badly on the phone/WhatsApp, then the loss of trust extends to other parts of the programme as well.”

¹³ Core Humanitarian Standard, 4.1

TRUST AND ORGANISATIONAL IDENTITY

Some organisations working with migrants find that logo visibility is invaluable, allowing migrants who have received assistance from them earlier in their journey to readily identify them as a trustworthy partner. The emblem of the Red Cross and Red Crescent Movement is readily identifiable to people around the world, for example, and some National Societies have found that the good reputation of others in earlier countries on the route has helped build trust. In other contexts, organisations have found it more helpful to emphasise the project's identity, particularly when several organisations are working together and across a number of borders. This was the experience of the Signpost project of Mercy Corps and IRC, for example, which is known as Refugee.info in Europe, as Cuéntanos in El Salvador and as Khabrona in Jordan.

“We look at age and nationality, but not ID or anything, so they can't be traced. It not only reassures them, but it also means that they can't be traced through our system. They get a number and that entitles them to something, but it is not linked to their name or their presence on-site.”

MANAGING INFORMATION

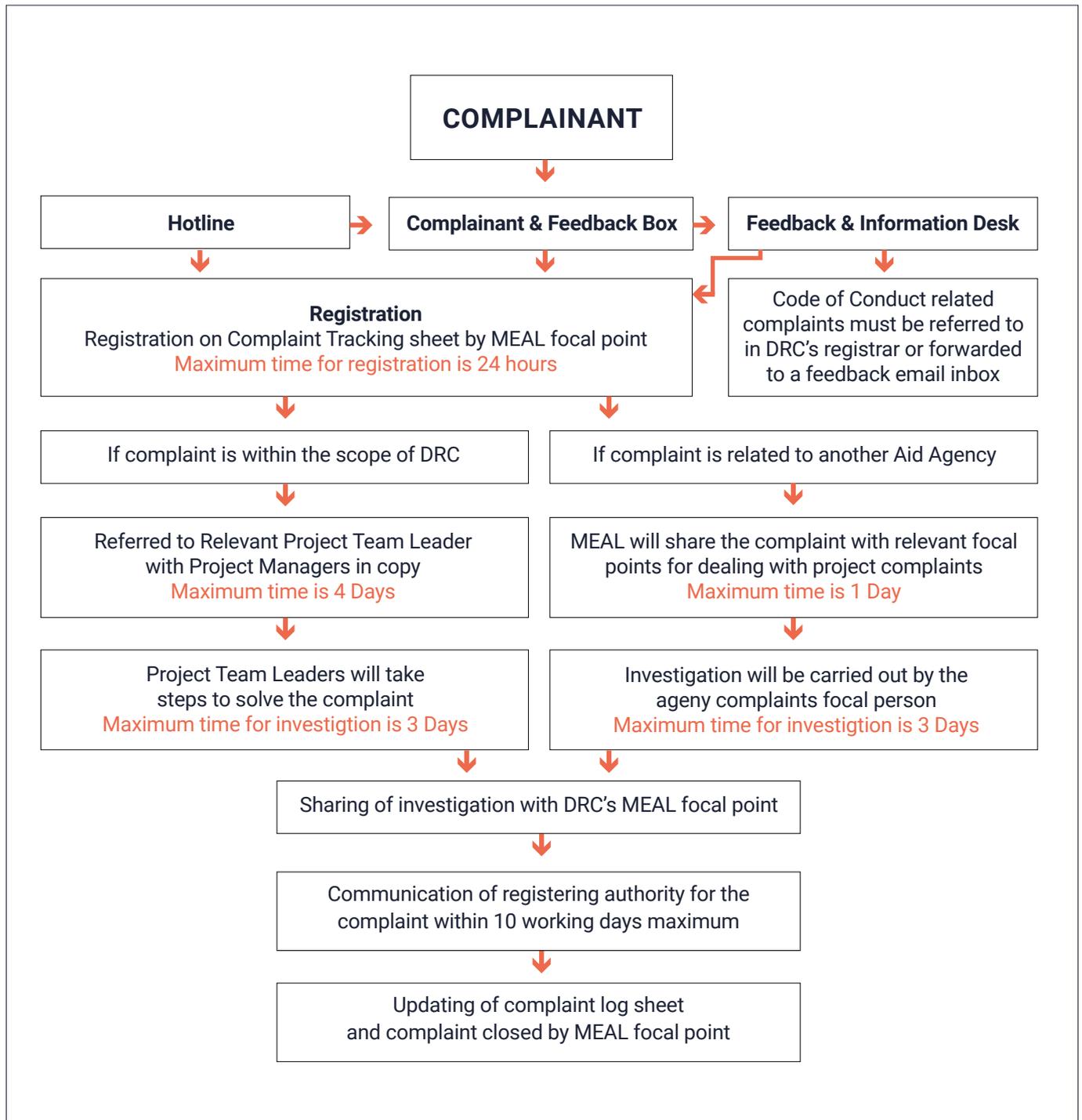
Feedback and particularly complaints can be incredibly sensitive and even political information. It is vital information is managed well at each stage of the process. This means it must be:

- *Channelled to the right people, ideally collected independently from programme staff, and with sensitive complaints handled entirely separately by an individual or team that is independent of the country hierarchy.*
- *Time bound, with maximum response times built into the processes.*
- *Anonymised and/or encoded as needed.*
- *Protected with adequate safeguards against hacking and data theft.*
- *Verified to ensure that it does not put undocumented migrants at risk, particularly if there is any legal way that authorities can force agencies to hand it over.*

Flow charts showing how mechanisms work are useful tools in developing systems – to ensure that there are no missing links – and for ensuring staff at various levels of an organisation and in different locations understand who is involved and how. These will differ from one context to another, but should include processes and timeframes for receiving information and processing it, with separate channels for sensitive complaints, as well as for closing the feedback loop, by communicating to the complainants, affected individuals and/or other service users how the organisation has responded.

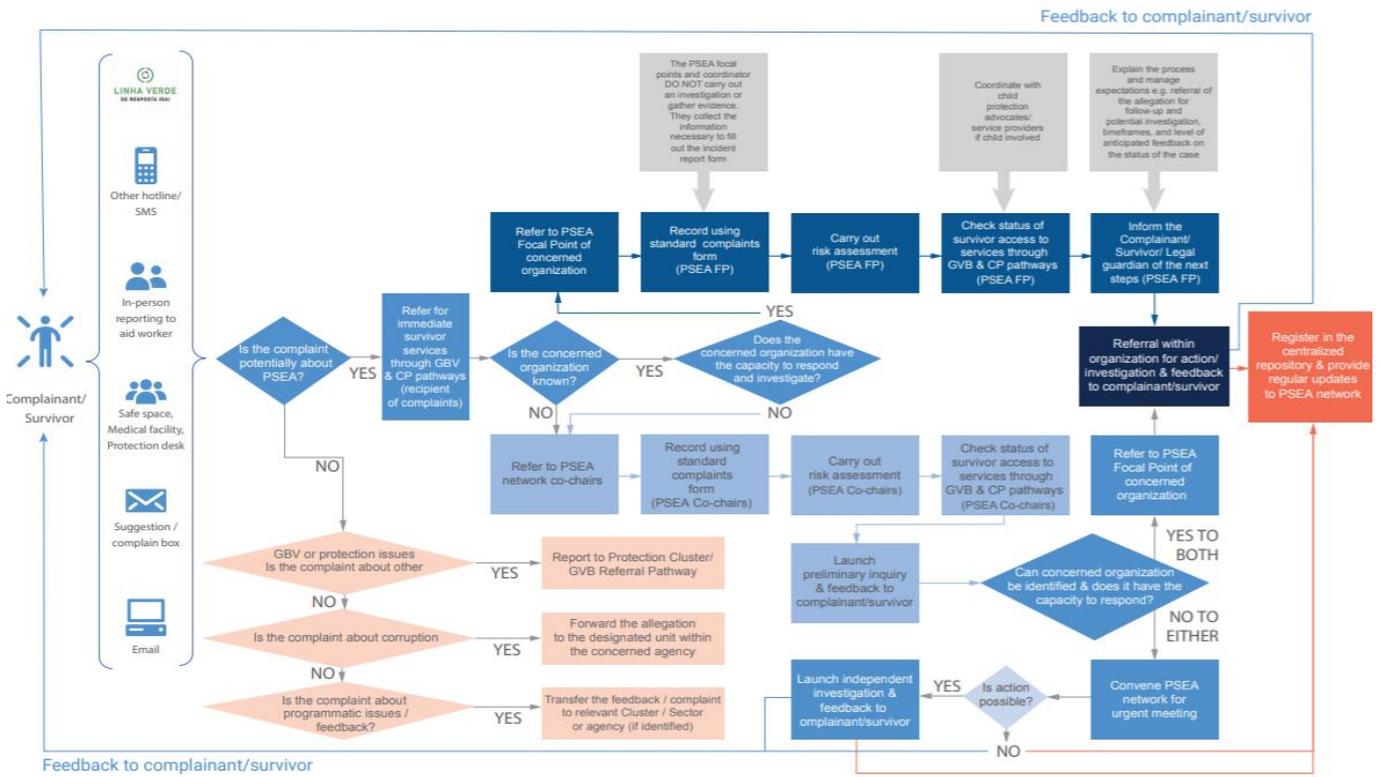
Figure 7 shows a beneficiary complaints and feedback mechanism process developed in Tunisia, and figure 8 is an example of a referral pathway for sensitive complaints that was developed in Mozambique in 2019.

FIGURE 7:
EXAMPLE OF A COMPLAINTS AND FEEDBACK MECHANISM PROCESS FLOW CHART¹⁴



14 Courtesy of Danish Refugee Council, Tunisia

FIGURE 8:
EXAMPLE OF A COMPLAINTS AND FEEDBACK MECHANISM PROCESS FLOW CHART¹⁵



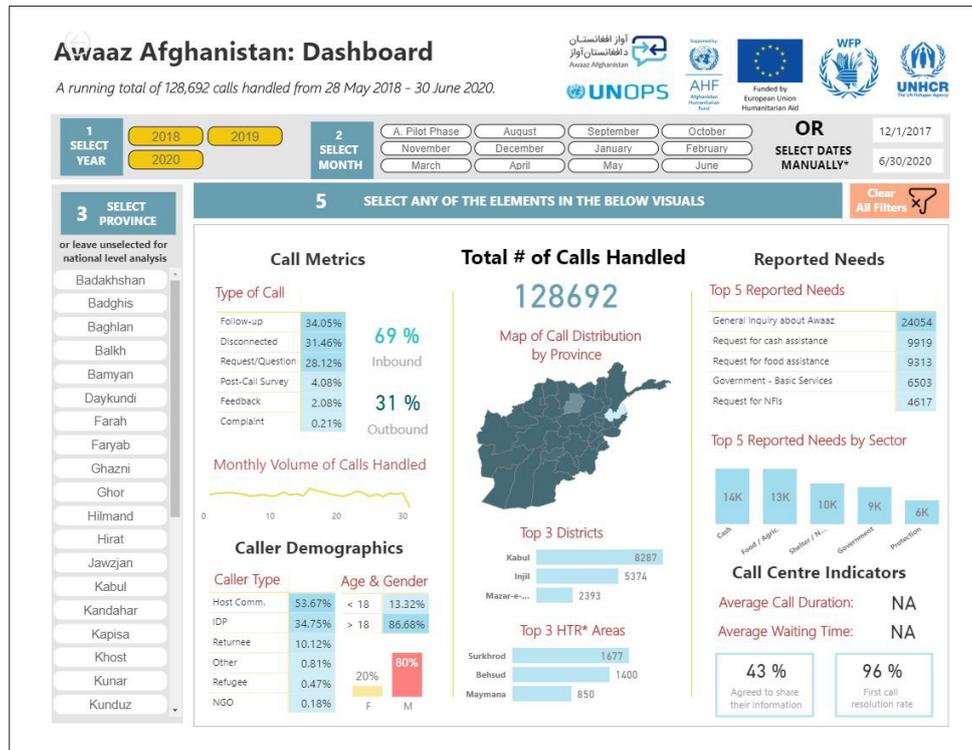
ENSURING TIMELY AND APPROPRIATE REFERRAL

It is too late once someone has raised a complaint to start thinking about how to follow up. Put processes in place **before you set up your system** for timely and appropriate referral of people who have experienced sexual exploitation, abuse or harassment.

- Consult with community members and service users about what systems exist, what they are willing to use, and who they trust for referrals of sensitive issues.
- Identify and document expert GBV service providers, existing local and national child protection mechanisms and related support services.
- Make a clear agreement about processes and procedures with any agency to which you plan to refer. Identify named individuals and know how to contact them.
- Have a back-up in case they are not available.
- Ensure you have a safe way of transferring information to referral agencies, and that their systems for ensuring confidentiality and data protection are consistent with yours.
- Investigate whether there are mandatory reporting systems for forms of violence or abuse that might be reported to you. Consider how you will manage this while taking a victim-centred approach. Discuss your position with relevant authorities before any complaints are received, and ensure staff, volunteers and potential complainants know what this is.
- You may receive sensitive complaints relating to other organisations, government structures, community or family. Each of these will require a specific approach. Think about how you will follow them up.
- Consider how your organisation can continue to follow up with the complainant over the longer-term, particularly if the person is on the move.

¹⁵ OCHA Mozambique, Mozambique PSEA Referral Pathway, April 2019. humanitarianresponse.info/en/operations/mozambique/infographic/mozambique-psea-referral-pathway

FIGURE 9:
USING INFORMATION MANAGEMENT TO ANALYSE DATA



INTERPRETING INFORMATION

Principles for management of data for static humanitarian contexts also hold true for contexts of migration. These include collecting only the information you need, maintaining confidentiality and ensuring that data is protected, for example.

In migration contexts, organisations should use the same systems for channelling data as they use elsewhere. This includes having feedback and complaints managed by staff outside of the programme hierarchy. Importantly, sensitive complaints should always be handled separately by safeguarding focal points most often entirely outside of the country team. This can also be outsourced to external agencies, if resourcing permits.

Principles of and systems for information management also remain the same, though they arguably take on even more importance in migration contexts. This is because of the great demographic variety in migration contexts, and the fact that it is often shifting and changing. Several organisations working in migration contexts recommended the use of dashboards to support in this work. However, it is important to remember that setting up these systems is only a first step. These should

not be treated as static repositories for data, but as dynamic tools which, when constantly used to inform programming, can transform its responsiveness.

As in other contexts, it is also important to interrogate the feedback that is received. It is easy to make assumptions about cause and effect that can lead to tweaking something that was working well, while neglecting something else that needed attention. Disrespectful or rude behaviour of staff toward migrants, for example, may be indicative of problems with organisational culture, but it could also mean that they are overworked and not getting enough support.

“The main complaints we get are because people feel that they have been unfairly excluded from the programme, but we also received information that people felt they were not treated well by staff. This is high-pressure, stressful work, and we didn't realise how much pressure our staff was under. The complaints were a tip-off that we needed to support them better, maybe bring in more people if we could afford it.”

VIII CLOSING THE LOOP

TOP TIPS

- As much thought should be given to how you communicate when closing the feedback loop as when you collected the input in the first place.
- It is important not just to adapt, but to be seen to be adapting. This helps build trust.
- Close the loop on the loop – don't just tell people what you have done – get their feedback on whether they feel you answered their concern. Ensure your responsive action does not inadvertently create an additional risk or harm.
- Capture the changes you have made in response to informal feedback, and include those in feedback to service users and other stakeholders.
- Give an update as quickly as possible about how you have addressed feedback or a complaint both to the individual that made it and to the people using services more generally. Even if the individual has moved on, it sends a message of respect, responsibility, and transparency.
- It may take longer to address some kinds of complaints, particularly those that are complex or sensitive, but it is important to immediately acknowledge its receipt and its seriousness, and to provide information about how it is being followed up.

The feedback loop may be considered closed when the input has been processed, action has been taken, and the person or community has had a response, as illustrated in figure 2. While this kind of action-reaction seems self-evident, there is often a gap between soliciting and receiving information and taking the necessary steps to turn this into programme changes or learning.

In static contexts, the person who gave the feedback is likely to be present to see its outcome. When people are on the move, however, it is far less likely that they will be around when the loop is closed. Yet we know people are more likely to trust an organisation and its mechanisms and are more likely to contribute when they see feedback taken on board. The question is how to make this happen in programmes for people on the move?

KEEP THE FEEDBACK LOOP SHORT. Some responses or adaptations can take place very quickly, even immediately.

WHERE APPROPRIATE, FOLLOW UP INDIVIDUALLY. This can be particularly difficult when people are on the move and may hesitate to leave contact information. Ask at the point of receiving feedback if they are happy to be contacted about it, and how they would like that to happen.

PAY IT FORWARD. People in transit may not feel a sense of ownership in the programme or see a value to contributing. Explaining how others' input has improved the situation for them may help. This can be as simple as putting a sign on the wall that outlines the suggestions that have been made and how they have been responded to.

“People don't get fed up with answering questions – they get fed up with processes that they feel are not resulting in change.”

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